



**TITLE VI STANDARDS &  
PROCEDURES MANUAL**

**FOR**

**CITY OF ANDERSON  
TRANSIT SYSTEM**

**Updated April 15, 2014**

# **CITY OF ANDERSON TRANSIT SYSTEM TITLE VI STANDARDS AND POLICIES**

Federal Title VI requirements of the Civil Rights Act of 1964 were recently updated by the Federal Transit Administration (FTA) and now require each large public transportation provider's governing board to approve five standards and policies:

- Major Service Change Policy
- Disparate Impact Policy
- Disproportionate Burden Policy
- System-wide Service Standards
- System-wide Service Policies

The first policy defines "major service change" as a threshold for when an agency will conduct a thorough analysis of the potential effects of service changes on protected populations. For the second and third policies, agencies are required to define thresholds for when they will find that a fare change or major service change will result in a "disparate impact" on the minority population or a "disproportionate burden" on the low-income population. The last two policies define service standards and policies to be used when determining whether service and amenities are distributed equitably to minority and non-minority routes and facilities.

The Major Service Change Policy, Disparate Impact Policy, and Disproportionate Impact Policy are currently going through public review via a series of four public meetings held throughout the county. Information about the Title VI process, complaint procedures, and the proposed standards and policies are available via the CATS website as well by calling the customer service phone number or emailing a dedicated email address.

# **PART 1**

## **MAJOR SERVICE CHANGE POLICY**

All major increases or decreases in transit service are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis completed for a major service change must be presented to the San Mateo County Transit District Board of Directors for its consideration and included in the CATS Title VI Program with a record of action taken by the Board.

A major service change is defined as:

A reduction or increase of 25 percent or more in total vehicle revenue miles in service on any specific route over a one-week period.

The following service changes are exempted:

- Changes to a service on a route with fewer than 10 total trips in a typical service day are not considered “major” unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities), as long as the service will be/has been operated for no more than twelve months.
- CATS-operated transit service that is replaced by a different mode or operator providing a service with the same or better headways, fare, transfer options, span of service, and stops.

## **PART 2**

# **DISPARATE IMPACT POLICY**

This policy establishes a threshold for determining whether a given action has a disparate impact on minority populations. Per FTA Circular 4702.1B:

*Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin...*

*The policy shall establish a threshold for determining when adverse effects of [fare/]service changes are borne disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The disparate impact threshold must be applied uniformly... and cannot be altered until the next Title VI Program submission.*

In the course of performing a Title VI Equity Analysis, CATS must analyze how the proposed action would impact minority as compared to non-minority populations. In the event the proposed action has a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or that benefits non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, CATS must evaluate whether there is an alternative that has a more equitable impact. Otherwise, CATS must take measures to mitigate the impact of the proposed action on the affected minority population and demonstrate that a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

The Disparate Impact Threshold to determine if the adverse impacts of a major service change (as defined in the first part of this document) or a fare adjustment is established at 20 percent based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

## **PART 3**

# **DISPROPORTIONATE BURDEN POLICY**

This policy establishes a threshold for determining whether a given action has a disproportionate burden on low-income populations versus non-low-income populations. The Disproportionate Burden Policy applies only to low-income populations that are not also minority populations. Per FTA Circular 4702.1B:

*The policy shall establish a threshold for determining when adverse effects of [fare/]service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts born by non-low-income populations.... The disproportionate burden threshold must be applied uniformly... and cannot be altered until the next [Title VI] program submission.... At the conclusion of the analysis, if the transit provider finds that low-income populations will bear a disproportionate burden of the proposed fare[/service] change, the transit provider should take steps to avoid, minimize, or mitigate impacts where practicable. The transit provider should describe alternatives available to low-income populations affected by the fare[/service] changes.*

The CATS Disproportionate Burden Threshold to determine if the adverse impacts of a major service change (as defined in the first part of this document) or a fare adjustment is established at 20 percent based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

## **PART 4**

# **SYSTEMWIDE SERVICE STANDARDS**

Pursuant to requirements set forth in The Federal Transit Administration's (FTA) Circular 4702.1B CATS must establish and monitor its performance under quantitative Service Standards and qualitative Service Policies. These service standards contained herein are used to develop and maintain efficient and effective fixed-route transit service. In some cases, these standards differ from standards used by CATS for other purposes.

The FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers set these standards; therefore, these standards will apply to each individual agency rather than across the entire transit industry:

- A. Vehicle Load
- B. Vehicle Headways
- C. On-time Performance
- D. Service Availability

### **A. VEHICLE LOAD**

Vehicle Load Factor is described as follows by FTA Circular 4702.1B:

*Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times. Transit providers that operate multiple modes of transit must describe the specific vehicle load standards for peak and off-peak times for each mode of fixed-route transit service (i.e., bus, express bus, bus rapid transit, light rail, heavy rail, commuter rail, passenger ferry, etc., as applicable), as the standard may differ by mode.*

CATS calculates Vehicle Load Factor by dividing the average peak passenger load on each route by the number of seats on the type of bus typically assigned to that route. Vehicle Load Factor is monitored regularly to ensure customer comfort and to determine whether additional capacity needs to be added to specific trips or routes based on changing demand patterns. All fixed route utilize a 22 passenger bus with a vehicle load of 1.3 with would have 6 standees at full capacity.

## **B. VEHICLE HEADWAY**

Vehicle headway is described as follows by FTA Circular 4702.1B:

*Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes); service frequency is measured in vehicles per hour (e.g., four buses per hour). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. A vehicle headway standard is generally expressed for peak and off-peak service as an increment of time (e.g., peak: every 15 minutes; and off peak: every 30 minutes). Transit providers may set different vehicle headway standards for different modes of transit service. A vehicle headway standard might establish a minimum frequency of service by area based on population density. For example, service at 15-minute peak headways and 30-minute off-peak headways might be the standard for routes serving the most densely populated portions of the service area, whereas 30-minute peak headways and 45-minute off-peak headways might be the standard in less densely populated areas. Headway standards are also typically related to vehicle load. For example, a service standard might state that vehicle headways will be improved first on routes that exceed the load factor standard or on routes that have the highest load factors.*

All of CATS fixed route have headway of one hour. Each route leaves the bus terminal in downtown Anderson on the hour and returns at approximately 50 after the hour. The route repeats every hour and only one bus runs each route each hour.

## **C. ON-TIME PERFORMANCE**

On-time performance is described as follows by FTA Circular 4702.1B:

*On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system. For example, a transit provider might define on-time performance as 95 percent of all runs system-wide or on a particular route or line completed within the allowed "on-time" window.*

A bus is determined to be late if it departs its scheduled "time point" three or more minutes later than the published time. Buses are considered early if they depart from a published time point one or more minutes before prior to the scheduled departure. It is CATS' goal to be on-time at least 85 percent of the time. CATS supervisory staff regularly monitors on-time performance and counsels operators who consistently fail to meet on-time performance standards that are

within their control. Discussions with bus operators are also used to identify vehicle scheduling issues which are corrected through service changes.

## **D. SERVICE AVAILABILITY**

Service availability/transit access is described as follows by FTA Circular 4702.1B:

*Service availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density. For example, in more densely populated areas, the standard for bus stop distance might be a shorter distance than it would be in less densely populated areas, and the percentage of the total population within a one-quarter mile walk of routes or lines might be higher in more densely populated areas than it would be in less densely populated areas. Commuter rail service or passenger ferry service availability standards might include a threshold of residents within a certain driving distance as well as within walking distance of the stations or access to the terminal.*

CATS's goal is to ensure 60 percent of city residents live within one-half mile of a bus route. CATS does not have designated bus stops as passengers are picked up anywhere along the route. CAT's service is particularly strong in communities with significant minority and low-income populations. Transit access is determined by mapping all active bus routes within the system and then calculating the population within one-half mile radii of those routes. This information is then compared to the total city population.

## PART 5

### SYSTEMWIDE SERVICE POLICIES

The FTA requires fixed-route transit providers to develop a policy for each of the following service indicators. Transit providers also may opt to set policies for additional indicators. The following system-wide policies differ from service standards in that they are not necessarily based on meeting a quantitative threshold, but rather qualitative evaluation results:

- A. Vehicle Assignment
- B. Transit Amenities

#### **A. VEHICLE ASSIGNMENT**

Vehicle assignment is described as follows by FTA Circular 4702.1B:

*Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, a transit provider may set a policy to assign specific types of vehicles to express or commuter service. Transit providers deploying vehicles equipped with technology designed to reduce emissions could choose to set a policy for how these vehicles will be deployed throughout the service area.*

CATS only has one type of bus available on the fixed routes. The buses are all 32 foot medium duty cab over buses. They are all 22 passenger vehicles. All buses have the same level of amenities available to riders.

#### **B. TRANSIT AMENITIES**

Transit amenities are described as follows by FTA Circular 4702.1B:

*Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Transit providers may have different policies for the different modes of service that they provide. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This...is not intended to impact funding decisions for transit amenities. Rather, this...applies after a transit provider has decided to fund an amenity.*

Transit amenities are distributed on a system-wide basis. Transit amenities include shelters. The location of transit amenities is determined by factors such as ridership, individual requests, and staff recommendations.