

STARTRAN ADVISORY BOARD

Date: May 26, 2016
Time: 8:00 A.M.
Location: 710 J Street
TOPIC: Public Input on Title VI Policies

At this meeting StarTran will present Title VI policies that are required by the Federal Transit Administration (FTA).

FTA requires transit providers to conduct Title VI equity analyses whenever they plan a fare change and/or a major service change. The major purpose of conducting service and fare equity analyses prior to implementing service and/or fare changes is to determine whether the planned changes will have a disparate impact on the basis of race or income. By conducting equity analyses, StarTran intends to ensure that the impacts of service and fare changes are distributed equitably to minority and low-income populations and are not discriminatory. The following policies have been reviewed by the StarTran Advisory Board and require public input before adoption of policies.

1. Major Service Change and Fare Change Policy.

Under the FTA Title VI guidelines, transit providers are required to define their own thresholds to determine when a change in service qualifies as a major service change.

Proposed Major Service Change Policy:

A major service change is defined as 25% or greater non-seasoned addition or reduction of vehicle revenue hours, miles or passengers on either a route or systemwide basis. The StarTran Advisory Board may, however, conduct a public hearing on a non-major service reduction change if special circumstances are deemed to exist.

Proposed Fare Change Policy:

A major fare change is made when there is a change in any cash fare or in the cost of any passes, tickets, transfers, or other means by which transit riders pay for their trips.

2. Disparate Impact and Disproportionate Burden Policy

Under the FTA Title VI guidelines, transit providers are required to establish their own thresholds to determine when disparate impacts and disproportionate burdens exist as a result of a major service change or fare change.

Disparate Impact Policy:

“Disparate impact” refers to a facially neutral policy or practices that disproportionately impacts members of a group identified by race, color, or national origin.

The transit provider shall develop a policy for measuring disparate impacts. The policy shall establish a threshold for determining when adverse effects of 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.

Proposed Disparate Impact Policy:

In accordance with Federal Transit Administration (FTA) regulations, should the impact of any major service change require a minority population to bear adverse effects greater than 20% than those adverse effects borne by the non-minority population, that impact will be considered disparate impact.

Disproportionate Burden Policy:

“Disproportionate burden” refers to a neutral policy or practice that disproportionately impacts low-income populations compared to non-low-income populations.

The transit provider shall develop a policy for measuring disproportionate burdens on low-income populations. The policy shall establish a threshold for determining when adverse effects of 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 borne by non-low-income populations. The disproportionate burden threshold must be applied uniformly, regardless of mode.

In other words these policies involve the comparison between the proportion of the protected class population in the area to be affected, and the proportion of the protected class population in the StarTran service area. Essentially, if the affected area has significantly more minority and low-income populations as compared to the StarTran service area, then the service/fare change may constitute disparate impact and/or pose disproportionate burden.

Proposed Disproportionate Burden Policy:

In accordance with FTA regulations, should the impact of any major service change require low-income populations to bear adverse effects greater than 20% than those adverse effects borne by the rest of the population, that impact will be considered disproportionate burden.

Once adopted these policies will be used by StarTran to conduct Title VI equity analyses. For more information about the requirements, see FTA Circular 4702. 1B

Any comments related to these policies can be submitted in writing to:

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