

# 2018 Title VI Plan Triennial Report

## **Orange County Transportation Authority**

**Recipient Number 1682**

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**ORANGE COUNTY TRANSPORTATION AUTHORITY DOES NOT DISCRIMINATE ON THE BASIS OF RACE, COLOR, OR NATIONAL ORIGIN OR ANY OTHER MANDATE PROHIBITED BY LAW.**

## OCTA Title VI Report | **2018**

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### Part I

## INTRODUCTION

Title VI of the Civil Rights Act of 1964 provides that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” To fulfill this basic civil rights mandate, each federal agency that provides financial assistance for any program is authorized and directed by the United States Department of Justice to apply provisions of Title VI to each program by issuing generally applicable rules, regulations, or requirements.

Since 1972, the Federal Transit Administration (FTA) has required recipients of federal assistance to certify compliance with the requirements of Title VI as part of the funding eligibility process.

### Purpose of the Title VI Report

The purpose of this report is to document the practices and operations of the Orange County Transportation Authority (OCTA) for compliance with Title VI. This report's intent is to document the steps OCTA has taken and will take to ensure that all services, programs, and activities supported by federal financial assistance are implemented without regard to race, color, or national origin and eliminate any additional barriers such as language or low-income status that may inhibit the use of the OCTA transit system.

Consistent with its commitment to meet FTA regulatory requirements, OCTA updates and submits a Title VI report on a triennial basis to the FTA Region XI office via the Transit Award Management (TrAMS) portal.

OCTA is submitting this report as of the published due date of October 1, 2018 in accordance with FTA Circular 4702.1B guidance.

The Title VI reporting requirements as they relate to specific sections in this report are prepared in five main sections:

**Section 1: General Reporting** addresses the general reporting requirements that apply to all recipients of federal funds. These requirements include procedures for filing civil rights complaints, a list of Title VI investigations, complaints, and lawsuits, plans for providing meaningful access to persons with limited English proficiency; notification regarding protection under Title VI, means by which the public is involved in decision making processes, and provides documentation the governing Board has been provided an opportunity to review and approve the Title VI Plan document prior to submitting the triennial report to the FTA.

**Section 2: System-Wide Service Standards & Policies** describes the OCTA system-wide service standards and policies for vehicle load, vehicle headway, on-time performance, service availability, and vehicle assignment to ensure high-quality and safe levels of service to the public.

**Section 3: Demographics & Service Profile Maps** provides demographic and service profile maps, charts, and travel patterns which include minorities and low-income in the context of the programs and services that OCTA provides.

**Section 4: Transit Service Monitoring** evaluates the extent to which OCTA has met its service standards and the levels of service provided to the various communities served by OCTA.

**Section 5: Evaluation of Service and Fare Changes** describes the service change process and summarizes the major service changes and/or fare increases/decreases during the triennial reporting cycle.

## **Title VI Certifications and Assurances**

At the start of each federal fiscal Year, OCTA executes and submits the FTA Certifications and Assurances within 90 days of the date a notice of availability is published by FTA in the Federal Register. OCTA submits these assurances to FTA to convey intent and ability to comply with all applicable provisions, including those of Title VI. A copy of the 2018 FTA Certifications and Assurances is provided in **Attachment A**.

## **SECTION 1: GENERAL REPORTING REQUIREMENTS**

The general reporting requirements apply to all recipients of federal funds regardless of the size of its urban area population. These general reporting requirements include: procedures for notifications regarding protection under Title VI; methods for filing civil rights complaints; a list of Title VI investigations, complaints, and lawsuits; distribution of information and outreach efforts for programs and services plans; means for providing meaningful access to persons with limited English proficiency; the racial composition of the membership of non-elected boards; and a summary of the monitoring policies utilized to ensure all sub-recipients are in compliance with Title VI regulations.

### **Notification of Protection Under Title VI**

As required by Title VI circular guidance, OCTA has developed various media to notify its beneficiaries of their rights and protections under Title VI. The OCTA Title VI protection notification and multi-language permanent bus placards are on all revenue vehicles. Brochures are available on all revenue vehicles and in the OCTA lobbies in English and Spanish. The OCTA store has brochures as well as Title VI electronic signage in English, Spanish, and Vietnamese. Title VI information is also available in English, Spanish, and Vietnamese and can also be translated into all identified Safe Harbor provision languages at OCTA.net. The OCTA bus book also includes notification protection information in English and Spanish. OCTA bus stop and transportation center informational kiosks include Title VI protection information in English and Spanish. Examples of the protection notice media are provided in **Attachment B**.

## **OCTA's Title VI Complaint Procedure & Complaint Form**

It is the policy of OCTA to employ its best efforts to ensure that all programs, services, activities, and benefits are implemented without discrimination. This section provides information on OCTA's procedure for filing a complaint alleging discrimination on the basis of race, color, or national origin.

Any person who believes that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with OCTA, the FTA, or the Secretary of Transportation. Further, OCTA prohibits intimidation, coercion, or engagement in other discriminatory conduct against an individual who has filed a complaint.

The OCTA complaint procedure and form are provided in **Attachments C and D**.

## **List of Transit-Related Title VI Investigations, Complaints and Lawsuits**

During the triennial review period, there were no transit-related Title VI complaints, investigations, or lawsuits naming OCTA, any of its seven affiliates or sub-recipients, alleging discrimination on the basis of race, color, or national origin.

## **Public Participation Plan and Summary**

### **Public Involvement Plan (PIP)**

In consideration of Title VI compliance and Executive Orders 12898 and 13166, OCTA has developed a Public Involvement Plan (PIP). The intended purpose of the PIP is to demonstrate public involvement efforts and enhance access to OCTA's transportation decision-making process for low income, minority, and limited English proficient (LEP) populations. The PIP includes public participation methods, strategies, specific project examples, and performance measures and objectives.

A copy of the revised 2016 Public Involvement Plan is provided in **Attachment E**.

## **Summary of Outreach Efforts for Title VI Projects and Programs**

In November 2015, OCTA conducted a public involvement program to inform customers/public and to gather feedback on OC Bus 360, a plan that looks at bus system improvements from all angles. As part of the initiative, OCTA proposed a service plan for 2016 to add, increase, reduce and/or eliminate services to optimize the efficiency of the overall bus system. The extensive program involved print advertising through English, Spanish, and Vietnamese newspapers; multi-lingual advertisements and collaterals on buses; digital advertising and email blasts; transit ambassadors at 12 key bus stop hubs and school/employer/senior

outreach; local jurisdiction communication; four community meetings and one public hearing. Following extensive public outreach, a total of 1,337 comments were received at community meetings and the public hearing, online, and by mail and phone.

Also as part of OC Bus 360°, OCTA evaluated its fare policy based on an independent evaluation by consultant CH2M and evaluated by OCTA staff. In August 2016, the Proposed Fare Policy Adjustments Plan was released for public review. The extensive program involved print advertising through English, Spanish, and Vietnamese newspapers; multi-lingual advertisements and collaterals on buses; digital advertising and email blasts; transit ambassadors and street team outreach; local jurisdiction communication; three community meetings and one public hearing. As a result, a total of 278 comments were received at community meetings and the public hearing, online, and by mail and phone.

On July 24, 2017, the OCTA Board of Directors received the Proposed February 2018 Bus Service Plan and directed staff to implement a public outreach program to solicit feedback. The extensive program involved print advertising through English, Spanish, and Vietnamese newspapers; multi-lingual advertisements and collaterals on buses; digital advertising and email blasts; school/employer/senior outreach; three community meetings and one public hearing. Following extensive public outreach, a total of 376 customer comments were received at community meetings and the public hearing, online, and by mail and phone.

Copies of the individual public involvement plans in conjunction with the 2016 and 2018 service and/or fare change equity analysis are provided in **Attachments N and O**.

Recruitment efforts for one of two public member Board of Directors (Board) positions began on October 10, 2016. A website notification was available on OCTA.net for interested parties to submit an application. Ads were placed in locally circulated newspapers to also notify the public of the open public member position, including the Los Angeles Times and OC Register. Ads were also placed in Spanish and Vietnamese language newspapers, including the Unidos and the Nguoi Viet Daily News. Social media posts on Facebook and Twitter highlighted the recruitment. News of the public recruitment was also posted in the OCTA Blog and emailed to subscribers.

Recruitment efforts for two public committee member began in April 2018. A copy of the open public member position recruitment press release is provided in **Attachment F**.

Lastly, public comments are sought at bi-monthly OCTA Board meetings. Each meeting includes a specific time for public comments. This time provides an open forum for individuals to present their concerns regarding transit operations and policies directly to OCTA Board and staff. In the event that public comments are received with reference to Title VI compliance, the OCTA would review these comments and take appropriate action to address and resolve these matters.



### Limited English Proficiency Plan (LEP)

The OCTA Limited English Proficiency Plan has been updated and is seeking Board approval. A draft version of the June 2018 updated OCTA Limited English Proficiency Plan is provided in **Attachment G**.

### Racial Composition of Membership of Non-Elected Boards

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." Depicted below is the membership of OCTA's non-elected decision-making bodies by race.

Committee	Caucasian	Hispanic	African American	Asian/ Pacific Islander American	Native American
Citizens Advisory Council	88.9%	11.1%	0.0%	0.0%	0.0%
Special Needs Advisory Committee	70.6%	23.5%	5.9%	0.0%	0.0%

OCTA efforts to encourage minority and low-income members of the population to participate in the various decision-making boards is specified in the OCTA Public Involvement Plan provided in **Attachment E**.

### Sub Recipient Title VI Programs

OCTA monitors a variety of sub-recipient programs consisting of one local transit agencies, six JARC and New Freedom projects. A copy of the 2016 OCTA Sub-Recipient Monitoring Procedure is provided in **Attachment H**.

### Sub-Recipient Monitoring Summary

#### Local Fixed-Route Transit Providers

##### Anaheim Transit Network

During the 2015 compliance review one corrective action was identified. ATN was directed to provide details of training regarding Title VI and evidence of the conduct of training by March 11, 2015. This corrective action has been subsequently closed. On January 25-26 2018, OCTA conducted a Title VI compliance review with ATN. One open action item noted pertaining to Title VI was identified with regard to an equity analysis. ATN was provided a timeframe to submit an updated procedure for the methodology used to determine whether a

fare or major service change (adding or reducing service) has a disparate impact or disproportionate burden.

On June 25, 2018, the ATN Title VI plan document utilizing FTA circular 4702.1B was electronically filed with OCTA and is available for review upon request.

### **Non Fixed-Route Transit Providers**

#### **Job Access & Reverse Commute (JARC)/New Freedom**

On-site visits were conducted from July through September 2017 for all JARC/New Freedom sub-recipients. In 2018, two on-site visits have been completed to review all compliance self-certifications including Title VI. OCTA has also conducted full compliance reviews for our two JARC/New Freedom sub-recipients, as well as one initial desk-top review. OCTA is assisting all JARC/New Freedom sub-recipients with regard to closing any corrective actions.

As of February 28, 2018, all JARC and New Freedom sub-recipients were required to electronically file a Title VI plan document with OCTA utilizing FTA circular 4702.1B. Two sub-recipients were granted an extension to obtain verification the governing bodies reviewed and approved their programs. Copies of all plans are available for review upon request.

#### **Construction of Facilities**

During the triennial reporting cycle, OCTA did not construct a storage or vehicle facility or operating center.

#### **Governing Board Review and Approval of Title VI Plan**

The meeting minutes and resolution documentation demonstrating the Board had the opportunity to review and approve the 2018 Title VI Plan and received a briefing for the outcome on the System-Wide Service Standards is provided in **Attachment I**.



## SECTION 2: SYSTEM-WIDE SERVICE STANDARDS & POLICIES

To guard against discriminatory service design or transit operations, Title VI guidelines require the adoption of System-Wide Service Standards and Policies. In keeping with these guidelines, OCTA has established criteria for its transit services to ensure fair use and equitable access to OCTA resources and services. The section that follows describes OCTA's System-Wide Service Standards for vehicle load, vehicle headway, on-time performance, service accessibility, and policies for vehicle assignment as well as the distribution of transit amenities.

In February 2012, OCTA formed a multiple departmental Title VI working group for the purpose of updating the existing System-Wide Service Standards. In order to optimize resources, an update to the fixed-route System-Wide Service Standards was scheduled to be conducted in conjunction with the public outreach and solicitation efforts for the addition of a new mode of transportation, namely the OC Streetcar. Due to the delay in the signing of the full funding grant agreement for the project, the timeline for outreach efforts to establish service standards was extended for approximately one year. In addition, Proposition 6 to repeal SB1 has been added to the November 2018 election ballot. If SB1 is repealed, OCTA will incur a funding shortfall that may result in the reduction of service requiring a full Title VI analysis and public outreach and solicitation effort. OCTA will use the existing standards if reducing service becomes necessary. OCTA anticipates to begin working on a timeline to update the System-Wide Services Standards in February or March of 2019.

The narratives below summarize the System-Wide Service Standards approved by the OCTA Board on October 5, 2012.

### System-Wide Service Standards

#### **Vehicle Load**

OCTA's Vehicle Load applies to the maximum number of passengers allowed on a revenue vehicle in order to ensure the safety and comfort of customers. The load standard is expressed as the ratio of passengers to the number of seats on the vehicle and it varies by mode and by time of day. As of October 5, 2012, the vehicle load service standard is 130 percent average to the peak one hour in each peak period, with the 125 percent average for the other two hours in each peak period.

#### **Vehicle Headway**

Vehicle Headway is the time interval between vehicles on a route that allows passengers to gauge how long they will have to wait for the next vehicle. Similar to vehicle load, vehicle headway varies by mode and time of day. Vehicle headway is primarily determined by bus ridership and is limited by the availability of resources to operate the system.

As of October 5, 2012, Vehicle Headway fixed route service standards are defined as frequencies of 30 minutes or less during the service day, which is defined as 6:00 a.m. to 6:00 p.m. Community routes service are frequencies of 60 minutes or less during the service day. Stationlink, and express buses have variable trip times linked to employment centers start and end times. These are peak hour service and only operate during commute periods. Bravo Service is a companion to local service and as such also uses the 30 minute or less standard.

### **On-Time Performance**

OCTA defines On-Time Performance as not more than five minutes late. On-Time Performance is measured at the time-points. A trip is on-time as long as it does not leave a time-point ahead of the scheduled departure time and no more than five minutes later than the scheduled departure time. As of October 5, 2012, the On-Time Performance Service Standard is measured at 85% of the line level as reliable.

Exclusions from On-Time Performance are early departure times at time-points located within Free Running time route segments and Stationlink routes are measured for trips scheduled to arrive at Metrolink stations in the evening.

### **Service Accessibility**

Service Accessibility is the percentage of population in proximity to bus service. As of October 5, 2012 the OCTA Service Accessibility Standard is 90 percent and includes the combination of residents and jobs within a half-mile of public bus routes in Orange County.

### **Policies**

#### **Vehicle Assignment**

Vehicle Assignment refers to the process by which vehicles are assigned to routes throughout the system. The policy used for vehicle assignment is governed by various operational characteristics and constraints.

At an average age of 6.4 years for the fixed route bus fleet, and average age of 3 years for the demand response bus fleet, OCTA's fleet of vehicles is beyond its mid-life. All routes are accessible to persons with disabilities. Large vehicles are scheduled for replacement after a minimum of 18 years of service and small buses are scheduled for replacement after 7 years or 200,000 miles. OCTA has replaced most of its fleet with vehicles powered by environmentally friendly fuels assigned system-wide. In 2018, OCTA's fixed route active fleet was composed of 532 Compressed Natural Gas (CNG) buses, and 20 contingency Diesel-powered buses. The demand response fleet consisted of 248 gasoline-powered buses.

OCTA currently makes use of various vehicle types. Vehicle assignments to particular routes vary due to individual characteristics of each route and assignments are based on the following criteria:

- Size of division and maintenance capabilities
- Passenger loading on the lines
- Equalizing bus series mileage
- Equalizing the percentage of spares by bus series
- Particular route operating conditions

An analysis as of the February 2018 service change for the OCTA Fleet Assignment for Minority and Non-Minority routes is provided in **Attachment J**.

A copy of the OCTA Vehicle Assignment policy is provided in **Attachment K**.

### **Distribution of Transit Services and Amenities**

OCTA does not have decision-making authority over sitting amenities such as bus benches and shelters. Transit amenities are solely installed and maintained by the local city/County of Orange jurisdiction.



## SECTION 3: DEMOGRAPHIC DATA MAPS

This section addresses the Program Specific Requirements of Title VI and provides numerous maps, overlays and summary statistics of the OCTA service area in relation to demographic data from the 2015 American Community Survey.

### Demographics and Service Profile

For each Title VI triennial report, the OCTA provides numerous maps, overlays, and summary statistics of the OCTA service area, using demographic data from the 2015 American Community Survey. These materials are useful both for describing the current composition of neighborhoods in terms of minority and low-income residents, and for understanding the spatial relationships of these areas in the context of the services that OCTA provides.

**Exhibits 1 through 7** present a series of maps and overlays that describe these relationships as required by the Department of Justice, 28 CFR Part 42, Subpart F and the Department of Transportation, 49 CFR Part 21, Title VI of the Civil Rights Act of 1964.

For this report, census data from the 2011-2015 American Community Survey 5-year estimates for each block group within Orange County is used to determine the countywide percentage of minorities (**Attachment L**). In Orange County, minority residents comprise 57.6 percent of the total county population. This countywide average is used as the benchmark to determine whether a specific block group is considered a minority area. Block groups with minority populations that are at or exceed the 57.6 percent average are designated as a minority census block group. These minority areas are mapped and highlighted in **Exhibit 1** and **Exhibit 6** and **Attachment L** identifying minority transit routes, which are those with over one-third of its total length serving within a minority census block group.

Low-income areas are mapped and highlighted in **Exhibit 7**, which identifies low-income areas as those block groups where the percentage of persons living below 150 percent of the Federal Poverty Guidelines exceeds the countywide average of 21.5 percent.

These GIS maps profile the distribution of minority populations in relation to OCTA's bus services and reveal the extent to which members of minority groups are beneficiaries of OCTA bus services:

- **Exhibit 1: Minority and Non-Minority Populations** displays the distribution of minority and non-minority residential areas within Orange County. The minority distribution is determined by identifying census block groups where the minority population is greater than the countywide average of 57.6 percent.

- **Exhibit 2: Major Streets and Highways** map displays all major streets and highways in Orange County based on the 2017 OCTA Master Plan of Arterial Highways (MPAH). The major streets and highways are shown in relation to the minority and non-minority populations.
- **Exhibit 3: OCTA Bus Routes by Service Type** illustrates OCTA's transit system by route type. Route types include Local, Community, "Stationlink" (rail feeder), Express routes, and a proposed street car project. The different route types overlay the minority and non-minority populations to reveal their geographic relationship. The bus routes in this map are based on the February through June 2018 service change.
- **Exhibit 4: Transit-Related Facilities** identifies the locations of all key transit-related facilities in relation to the minority and non-minority populations within Orange County. Key transit-related facilities include park and rides, transportation or bus centers, OCTA bus bases, the OCTA administrative offices, Metrolink rail alignment, and Metrolink rail stations.
- **Exhibit 5: Major Activity Centers** illustrates the distribution of primary activity centers in relation to minority and non-minority populations within Orange County. Activity centers include concentrations of employment, elementary, middle and high schools, universities, colleges, and hospitals.
- **Exhibit 6: Minority Bus Routes** shows OCTA's local bus routes having 1/3 or more of their overall length within minority block groups and express or rail feeder routes having minority ridership greater than or equal to 79.0% of passengers. Based on OCTA's most recent on-board origin-destination bus survey, it is estimated that 79.0% of all riders are minority persons. The bus routes in this map are based on the February 2018 service change.
- **Exhibit 7: Low-Income Populations** displays the distribution of low-income block groups within Orange County based on the percentage of the population below 150 percent of the Federal Poverty Guidelines. The countywide average is 21.5 percent.



## **SECTION 4: SERVICE MONITORING**

OCTA is the provider of public transportation that operates 50 or more fixed route vehicles in peak service and is located in an UZA (Urbanized Areas) of 200,000 or more in population. In order to ensure compliance with Title VI regulations, the FTA requires OCTA to monitor the performance of its transit system relative to OCTA system-wide service standards and service policies with respect to minority versus non-minority areas not less than once every three years. OCTA has established internal guidelines for ensuring compliance with Title VI as part of its on-going project management and contract administration efforts.

### **LEVEL OF SERVICE COMPLIANCE**

#### **System-Wide Service Standards**

The procedure for examining levels of service as described in the FTA Title VI Guidelines involves comparing system-wide service standards and policies for the system as a whole to individual performance of routes serving minority communities.

Minority persons account for 57.6% of the Orange County population. Minority areas are block groups where minority persons make up 57.6% or more of all persons in each block group. Local bus routes having one-third or more of their service lengths within minority block groups are considered minority bus routes.

The Route Characteristics Charts in Exhibits 8–10 show performance results for the OCTA fixed-route system including peak load factor, on-time performance, and vehicle assignment, number of vehicles and average vehicle age. Shaded regions in the chart show minority transit routes.

The discussion that follows provides a briefing of the monitoring results for how OCTA performed in comparison to the system wide service standards identified in Section 2 of this report.

#### **Vehicle Load**

The peak load factor for six routes exceeded the OCTA standard which states that peak load factors should not exceed 125 percent during the peak period and should not exceed 100 percent for other time periods. All routes currently have less than 100 percent average peak loads based on an analysis of Automatic Passenger Counter data from the February 2018 Service Change (**Exhibit 8**). Vehicle loads have decreased since 2015 because of declining systemwide ridership.

#### **On-Time Performance**

Since 2013, on-time performance is determined using the Automated Vehicle Locator (AVL) system. AVL data measures all trip times at timepoints for each bus

route and the results are compared to the service standards which state that at timepoints, a trip is on-time as long as it is no more than five minutes late. A bus route's schedule is considered to be on-time if 85-percent of the timepoints measured during the service day are no more than five minutes late.

An analysis of data for the February 2018 Service Change shows that systemwide on-time performance is at 84.9% which is very close to the 85% target (**Exhibit 9**). Minority routes had an average on-time performance of 84.7% while non-minority routes average 86.4%. Upcoming schedule adjustments should focus on improving minority route performance.

### **Vehicle Headway**

Vehicle headway is the time interval between buses on a route that helps passengers gauge the waiting time between trips. Similar to passenger loading, headways vary by mode and time of day. Vehicle headways are primarily determined by bus ridership (demand) and are constrained by the availability of resources to operate bus service.

OCTA service standards state that Local and Limited-stop service should operate at least at 30-minute intervals during the service day, and that Community services should operate at least at hourly intervals. Express and Stationlink routes vary according to demand and connections with commuter rail services. Express and Rail Feeder operate during peak commute periods only.

The average morning peak period headway for all OCTA bus routes is 29-minutes; during afternoon peak period, the interval is approximately 35-minutes. During the midday period, OCTA bus routes operate about every 35-minutes on average.

Minority routes operate more frequently than both the system and non-minority routes during all time periods. During the morning peak periods minority routes average 27-minutes between trips and 31-minutes in the afternoon peak period. During the midday, minority bus routes operate about every 32-minutes.

Non-minority routes operate every 37-minutes during the morning peak period and every 50-minutes during the afternoon peak period. Midday intervals average about 50-minutes.

Of the 38 bus routes comprising the Local service category, 30 are minority routes. Of the 38 Local service routes, 24 meet OCTA headway service standards of 30-minutes or better. Twenty-two of 30 minority routes meet the standard.

Five of seven routes comprising the Community category meet the standards calling for 60-minute frequency or better. Four of the six minority routes meet the standard. The one non-minority route in the Community category meets frequency standards.

Express bus and rail feeder services are scheduled according to demand linked with the employment centers they serve. Consequently, trips do not follow a strict frequency regime.

Limited-stop (Bravo!) service comprises the final service category. The two routes that operate in the mode are minority routes and comply with service frequency standards. The table below shows the minority and non-minority headways for time of day service.

Route Type	Weekday					Saturday	Sunday
	AM Peak	Base (Midday)	PM Peak	Early Eve	Late Eve		
Minority	26.7	32.4	31.3	38.0	47.4	44.3	44.2
Non-Minority	36.8	49.3	50.3	52.7	57.1	56.7	64.5
Systemwide	28.6	34.8	34.8	40.7	48.3	45.5	46.1

### Transit Accessibility

The table below shows the percentage of minority and non-minority area population and jobs served. OCTA's standard is that bus service should operate within ½ mile of 90% of the service area population and jobs. For the entire service area, 87% of population and jobs are currently served by a bus route. The percentage in minority areas is 95% and it is 79.5% in non-minority areas.

	Population & Jobs in Service Area (Orange County)	Population & Jobs within 1/2 Mile of Bus Route	Percent
Minority Areas	2,298,427	2,184,601	95.0%
Non-Minority Areas	2,478,406	1,970,328	79.5%
Total Service Area	4,776,833	4,154,929	87.0%

### Service Policies

#### Vehicle Assignment

During the peak period, 426 buses are operated of which 354 or 83-percent are assigned to minority transit routes. The OCTA fleet average age is approximately 6.4 years. The average age of the vehicles assigned to serve minority routes is approximately 6.0 years. The average of the buses on non-minority routes is 8.7 years (**Attachment J**). The average vehicle age on minority routes had decreased from 9.6 years in 2015 to 6.0 years in 2018 because recently-acquired vehicles have been assigned almost exclusively to minority routes.

### **Customer Service Polls**

OCTA polls its customers through On-Board Surveys on demographic and service issues, including trip destination. OCTA's Bus Customer Satisfaction On-Board Survey was conducted in 2014. The survey results demonstrated approximately half of OCTA's ridership is Hispanic and half utilize the system to commute to and from work and for work related appointments. Additionally, the survey indicated the majority of passengers prefer to receive fixed-route related information in English.

## SECTION 5: SERVICE CHANGES

In accordance with FTA Circular 4702.1B, effective October 1, 2012, transit providers operating 50 or more fixed route vehicles during peak hours of service and serving a population of Urbanized Area (UZA) of 200,000 or greater must evaluate prior performance, and all proposed changes that exceed the transit provider's major service change threshold. The purpose of the evaluation is to determine whether those proposed changes will have a discriminatory impact.

To comply with this FTA requirement, transit providers must adopt the following three policies:

- ☐ Major Service Change Policy
- ☐ Disparate Impact Policy
- ☐ Disproportional Burden Policy

The OCTA Service and Fare Change Evaluation Policy (Policy) defines what actions constitute a major change and are therefore subject to a service or fare Title VI equity analysis prior to implementation. The Policy establishes a threshold for determining when proposed change(s) result in a disparate impact on minority populations and/or a threshold for determining when the proposed change(s) have a disproportional burden borne by a low-income population.

On July 20, 2017, the October 5, 2012 Board approved the Service and Fare Change Evaluation Policy was updated with the current Chief Executive Officer's name. A copy of the 2017 Service and Fare Change Evaluation Policy is provided in **Attachment M**.

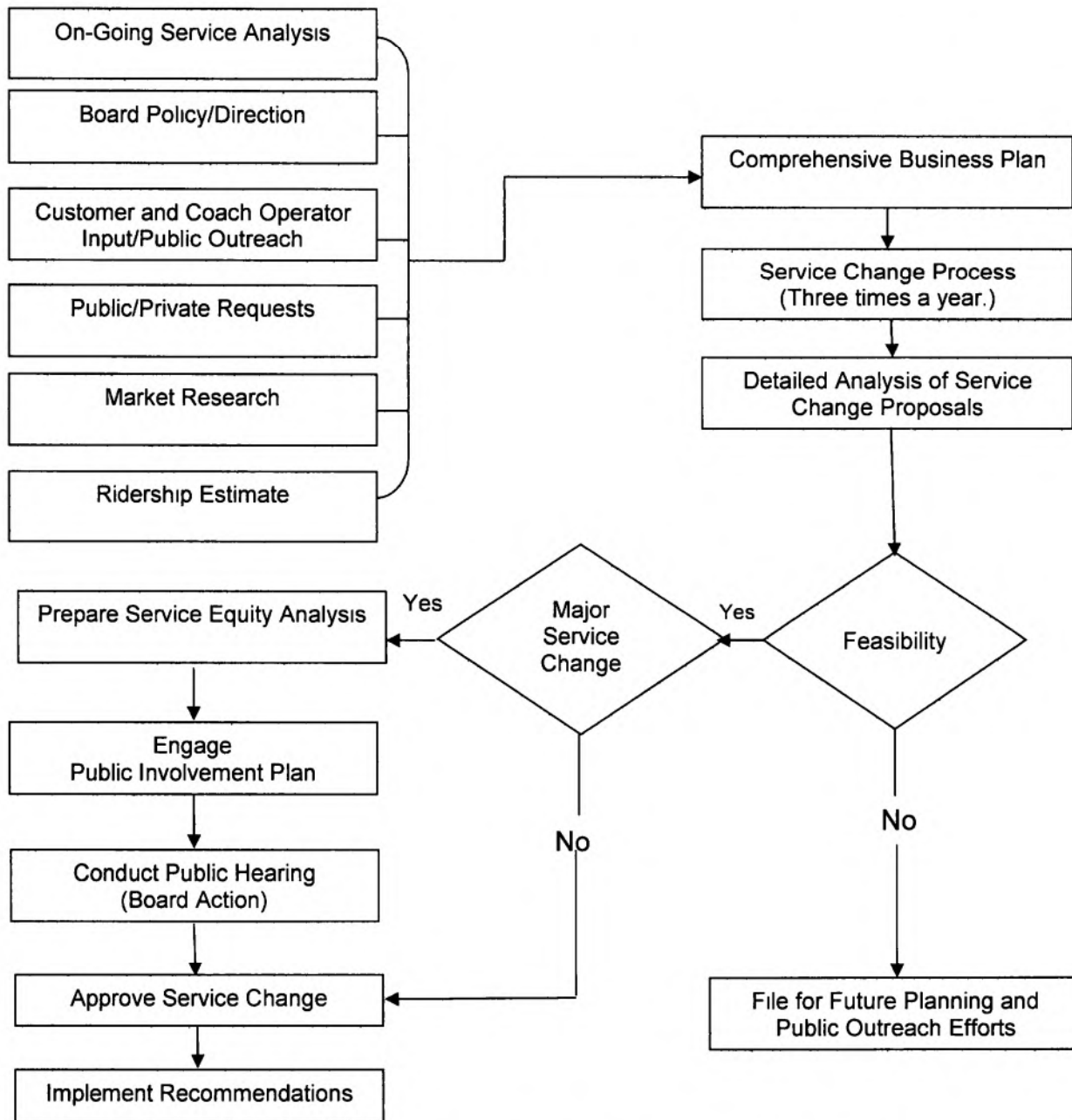
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### Changes in Service



As of July 12, 2010, annual service changes occur three times a year in February, June and October. The major elements of the decision-making process that are utilized in the development of the OCTA service change programs are illustrated below:

### Fixed-Route Service & Fare Change Evaluation Process



OCTA is committed to improving bus service for the benefit of all its customers. The chart below lists the service changes and/or fare increases/decreases since the filing of the previous Title VI report in October 2015.

**List of Service & Fare Changes  
Since June 2015**

<b>Service Change</b>	<b>Description</b>
June 2015 Service Changes	Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input, and seasonal adjustments
October 2015 Service Changes	Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input and increase efficiency
February 2016 Service Changes	Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input and increase efficiency
June 2016 Service Changes	Major Service Change – Phase 1 of the OC Bus 360° service improvement action plan
October 2016 Service Changes	Major Service Change – Phase 2 of the OC Bus 360° service improvement action plan
February 2017 Service Changes	Fare Adjustment – implementation of recategorized and increase to Express routes  Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input and increase efficiency
June 2017 Service Changes	Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input, and seasonal adjustments
October 2017 Service Changes	Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input and increase efficiency
February 2018 Service Changes	Major Service Change – improvements to system productivity and ridership
June 2018 Service Change	Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input, and seasonal adjustments

A copy of the equity analysis report, public outreach efforts and signed Board meeting minutes approving the two-phase OC Bus 360 Bus Service Plan implementation for the 2016 June and October service changes and February 2017 fare adjustment is provided in **Attachment N**.

A copy of the February 2018 Bus Service Plan equity analysis and Board meeting minutes approving the service change is provided in **Attachment O**.

### **CONCLUSION**

OCTA is committed to the enforcement of United States Department of Transportation's (DOT) Title VI regulations and will provide the most effective and efficient transit services possible, with full accountability to the constituency it serves. Through these established service standards and policies, OCTA will ensure that no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transit service on the basis of race, color, or national origin and make efforts to alleviate barriers such as language or income to OCTA services, programs, and information.