

OCTA Title VI Report | **2018**

Part IV

OCTA
Subrecipient Monitoring Plan
5307 & Bus Transit Discretionary Grants



2015-2016 Subrecipient Monitoring Plan

5307 & Bus Transit Discretionary Grants

Transit Division



I. Introduction

The Orange County Transportation Authority (OCTA) is the designated recipient of Federal Transit Administration (FTA) 5307 Urbanized Area Formula funds, as well as various discretionary grants, for Orange County, California. OCTA is responsible for the administration and management of these grants and for assuring that its subrecipients comply with FTA regulations.

II. Process to Ensure Subrecipient Compliance

1. Cooperative Agreements

All subrecipients of FTA funding are required to enter into cooperative agreements with OCTA which sets forth the funding source and amount, responsibilities of OCTA, and the responsibilities of the subrecipient, including compliance with all FTA laws, regulations, and guidelines. Agreements must be executed prior to reimbursement of any funding.

2. Assistance with Compliance of Federal Requirements

To effectuate compliance, OCTA will provide consultation to the subrecipients in the development of required FTA policies and procedures. OCTA staff will meet with subrecipients at least quarterly to discuss compliance with the terms of the cooperative agreement. Each subrecipient will be provided a copy of this monitoring plan along with copies of or web links to relevant documents including, but not limited to, FTA master agreement, circulars, and guidance, and sample policies and procedures.

To ensure procurements are handled in accordance with federal requirements, subrecipients are encouraged to forward draft procurement documents to OCTA for comment prior to release of a solicitation. OCTA will ensure that appropriate language/requirements are included within the solicitation and sample agreement.

OCTA will assist with the preparation of the subrecipient's Title VI program and necessary demographic information needed for equity analyses associated with fare increases, major service changes, and facility relocations. OCTA staff will attend public outreach events and public hearings associated with the Title VI program.

3. Reimbursement of Federal Funds

Federal funds shall be disbursed in accordance with the cooperative agreement. As a general rule, federal funds will be reimbursed in arrears upon proof of payment to the vendor from whom the federally funded service,

equipment, or asset was purchased. Under special circumstances, such as bus purchases, a subrecipient may request advancement of funds provided that payment is issued within federally prescribed time limits.

4. Compliance Reviews

Subrecipients shall have a formal review every 18 months. OCTA may retain a consultant with experience in performing compliance reviews for this review. Each subrecipient's initial review will look at each grant management area to identify deficiencies or areas for improvement. Additionally, documents related to any federally funded procurement will also be reviewed. Reviews will include a desk review of applicable policies and procedures and other relevant documents, and an onsite review with interviews of staff.

Completed reviews will be presented to the OCTA Board of Directors. OCTA will follow-up on recommendations to correct deficiencies. Subsequent compliance reviews will concentrate on changes in policies and procedures, risk based assessment of grant areas, and federally funded procurements.

5. Plan Updates

This plan will be reviewed at least annually and updated as federal laws, regulations, and guidance changes. Upon review and update, this plan will be distributed to each subrecipient.

III. Grant Management Areas to be Reviewed

The grant areas to be reviewed will be based upon the most recent edition of the FTA Triennial Review Workshop Workbook, which will be distributed to subrecipients following publication. The Workbook is also available on the FTA website: <http://www.fta.dot.gov>. Subrecipients are encouraged to attend the triennial review workshop conducted by FTA.

Board of Directors Meeting Minutes

Title VI Plan approved on: TBD

This page is a place marker for the meeting minutes from the Board of Director's meeting for which the Title VI Plan was approved.

**Fleet Assignments for Minority
And Non-Minority Routes**

February 2017 Service Change

ATTACHMENT J: VEHICLE ASSIGNMENT ANALYSIS

Average Vehicle Age for Local, Community, and Limited-Stop Routes (Jun-18 Service Change)							
Route	Type	Route Description	Total Route Length (miles)	Route Length (miles) within Minority Area	Percent of Route within Minority Area	Average Vehicle Age (Years)	Number of Buses
1	Non-Minority	Long Beach - San Clemente	48.19	0.09	0.2%	8.2	10
21	Minority	Buena Park - Huntington Beach	17.08	7.50	43.9%	9.7	2
24	Minority	Buena Park - Orange	13.95	8.04	57.6%	9.6	3
25	Minority	Fullerton - Huntington Beach	19.98	10.24	51.3%	9.6	37
26	Minority	Fullerton - Yorba Linda	11.62	6.47	55.7%	9.4	5
29	Minority	La Habra - Huntington Beach	25.64	17.60	68.6%	3.3	15
30	Minority	Cerritos - Anaheim	20.33	11.92	58.6%	9.4	7
33	Minority	Fullerton - Huntington Beach	15.72	10.52	66.9%	9.4	3
35	Minority	Fullerton - Costa Mesa	21.51	13.31	61.9%	9.5	12
37	Minority	La Habra - Fountain Valley	21.75	15.03	69.1%	5.5	12
38	Minority	Lakewood - Anaheim Hills	24.53	16.83	68.6%	9.5	12
42	Minority	Seal Beach - Orange	24.75	13.59	54.9%	9.7	12
43	Minority	Fullerton - Costa Mesa	17.76	13.39	75.4%	6.8	16
46	Minority	Los Alamitos - Orange	16.80	9.51	56.6%	9.7	7
47	Minority	Fullerton - Balboa	24.90	17.61	70.7%	3.9	20
50	Minority	Long Beach - Orange	21.49	9.21	42.9%	2.7	13
53	Minority	Orange - Irvine	13.84	9.42	68.1%	4.7	15
54	Minority	Garden Grove - Orange	18.26	11.01	60.3%	3.1	17
55	Minority	Santa Ana - Newport Beach	20.61	11.22	54.4%	3.1	15
56	Minority	Garden Grove - Orange	15.49	11.52	74.4%	1.5	3
57	Minority	Brea - Newport Beach	25.18	15.28	60.7%	3.5	20
59	Minority	Anaheim - Irvine	20.38	11.32	55.5%	9.6	10
60	Minority	Long Beach - Tustin	23.41	13.08	55.9%	2.8	14
64	Minority	Huntington Beach - Tustin	14.61	11.62	79.5%	4.0	10
66	Minority	Huntington Beach - Irvine	20.07	14.92	74.3%	2.8	13
70	Minority	Sunset Beach - Tustin	17.22	10.92	63.4%	10.0	12
71	Minority	Yorba Linda - Newport Beach	23.93	9.34	39.0%	10.0	8
72	Minority	Sunset Beach - Tustin	16.11	10.54	65.4%	1.3	6
76	Minority	Huntington Beach - JWA via Talbert/MacArthur	12.08	6.33	52.4%	9.9	2
79	Minority	Tustin - Newport Beach	19.17	10.06	52.5%	10.0	6
82	Non-Minority	Foothill Ranch - Rancho Santa Margarita	8.28	2.17	26.2%	10.0	3
83	Minority	Anaheim - Laguna Hills	27.69	21.81	78.8%	5.4	10
85	Non-Minority	Mission Viejo - Laguna Niguel	12.74	1.34	10.5%	10.0	2
86	Non-Minority	Costa Mesa - Mission Viejo	19.82	6.04	30.5%	10.0	3
87	Non-Minority	Rancho Santa Margarita - Laguna Niguel	14.85	3.12	21.0%	3.5	2
89	Non-Minority	Mission Viejo - Laguna Beach	13.99	4.61	32.9%	10.0	5
90	Non-Minority	Tustin - Dana Point	21.56	2.27	10.5%	10.0	8
91	Non-Minority	Laguna Hills - San Clemente	20.94	5.94	28.4%	10.0	7
129	Minority	La Habra - Anaheim	13.71	6.04	44.0%	9.7	14
143	Minority	La Habra - Brea	13.29	7.33	55.2%	9.9	2
150	Minority	Santa Ana - Costa Mesa	12.25	10.97	89.6%	9.4	14
153	Minority	Brea - Anaheim	12.41	7.02	56.6%	9.4	12
167	Minority	Orange - Irvine	23.56	8.63	36.6%	10.0	14
177	Minority	Foothill Ranch - Laguna Hills	10.70	5.53	51.7%	3.5	2
178	Non-Minority	Huntington Beach - Irvine	16.29	2.79	17.1%	10.0	2
543	Minority	Fullerton - Santa Ana	12.80	12.25	95.7%	5.3	10
560	Minority	Santa Ana - Long Beach	18.78	11.34	60.4%	5.6	13

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.

Average Vehicle Age for Express and Rail Feeder Routes (June-18 Service Change)						
Route	Type	Description	Minority Riders	Non-Minority Riders	Percent of Minority Riders	Average Vehicle Age (Years)
206	Minority	Santa Ana - Lake Forest Express	24	3	88.9%	3.5
211	Non-Minority	Huntington Beach - Irvine Express	20	6	76.9%	3.5
213	Non-Minority	Brea - Irvine Express	17	10	63.0%	3.5
453	Non-Minority	Orange Transportation Center - St. Joseph's Hospital	16	10	61.5%	9.9
462	Non-Minority	The Depot at Santa Ana - Civic Center	26	24	52.0%	10.0
463	Non-Minority	The Depot at Santa Ana - Hutton Center	17	7	70.8%	10.0
472	Non-Minority	Tustin Station - Irvine Business Complex	28	22	56.0%	9.2
473	Non-Minority	Tustin Station - UCI	22	15	59.5%	9.2
480	Non-Minority	Irvine Station - Lake Forest	30	17	63.8%	10.0
701	Non-Minority	Huntington Beach - Los Angeles Express	2	8	20.0%	9.3
721	Minority	Fullerton - Los Angeles Express	40	6	87.0%	9.3
794	Non-Minority	Riverside - South Coast Metro Express	30	13	69.8%	9.2

Minority bus passengers account for 79.0% of all systemwide ridership. Express and feeder routes with 79% or more minority riders are considered minority bus routes.

Average Vehicle Age Title VI Comparison		
Type	Average Vehicle Age (Years)	Number of Buses
Minority	6.0	354
Non-Minority	8.7	72
Systemwide	6.4	426

Vehicle Assignment Policy – August 15, 2017



Transit Division

General Manager, Transit

Deputy CEO

VEHICLE ASSIGNMENT POLICY

Policy#: TRANSIT-510.16VEHICLE

Origination Date: 02/24/2014

Revised Date: 08/15/2017

I. PURPOSE

The purpose of this policy is to document and guide fleet deployment practices to ensure that impacts associated with age and state-of-good repair (condition) are shared equitably throughout the Orange County Transportation Authority (OCTA) service area, and that deployment practices are consistent with the Federal Transit Administration's (FTA) guidance documented in Title VI Circular 4702.1B: Vehicle Assignment Policy.

II. ORGANIZATIONAL UNITS AFFECTED

The execution and support for the Vehicle Assignment Policy is a joint responsibility of the departments identified in Section V of this document.

III. POLICY

Vehicle assignment takes into consideration variables such as service type, operating environment constraints and limitations, passenger demand, and local community needs. Buses vary in terms of type, age, and condition (or state-of-good repair) since bus procurements are spread over multiple years. Consequently, included in the Vehicle Assignment Policy, is the FTA requirement to assess deployment practices and associated impacts on specific segments of the community from both a Title VI and Environmental Justice perspective.

The pertinent section of the FTA's Title VI Circular 4702.1B states:

"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."

Transit Division
VEHICLE ASSIGNMENT POLICY

Policy#: TRANSIT-510.16VEHICLE

Origination Date: 02/24/2014

Revised Date: 08/15/2017

Through this policy, transit bus assignment will carefully consider such impacts and implement mitigation measures to avoid potential disparate community impacts to the extent possible.

IV. DEFINITIONS

- A. Transit Bus** – A multi-passenger vehicle designed for passenger pick-up and discharge at bus stops established at fixed locations on streets and at terminals. The transit buses are scheduled to operate along a fixed-route within and/or between communities within the OCTA service area. All transit buses are designed to accommodate passengers using wheelchairs.
- B. Transit bus types** – Transit bus types vary to accommodate local roadway constraints and community preferences. Typically, transit buses vary in length and seating capacity. Longer buses generally offer more seats and standee area. Transit bus types in the current OCTA fleet include:
1. Standard size transit buses (40-foot) are the most common transit bus in the OCTA fleet and generally seat from 34 to 38 passengers and will accommodate standees. Most standard size buses are powered by compressed natural gas (CNG) although a small number of diesel powered buses are maintained for temporary use should either additional capacity be required immediately or a significant segment of the alternative powered fleet becomes unavailable for service. Future bus purchases are planned to be CNG or other clean fuel technologies.
 2. Large articulated transit buses (60-foot) are specialized transit buses seating in excess of 56 passengers. They are used on routes where peak passenger loads are highest and where bus stops can accommodate the additional bus length. OCTA's articulated transit buses are CNG powered. A few diesel articulated buses are in the contingency fleet.
 3. Medium size transit buses (25 to 35-foot) are specialized buses used in applications where passenger demand may be lower than average and/or operating conditions require the use of smaller vehicles. These vehicles are all currently CNG powered. Standees are not permitted on these vehicles.

V. TRANSIT BUS DEPLOYMENT PROCEDURES

- A. Equipment Assignment** – As part of the service change programs developed during the year, the Maintenance and Scheduling departments jointly develop a deployment plan that guides the assignment of specific bus types to specific bus routes operated by OCTA. Passenger demand, local community requirements, service application, bus stop length, bus garage proximity to individual bus routes, and specialized maintenance concerns are considered when developing the vehicle assignment policy.

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VEHICLE ASSIGNMENT POLICY

Policy#: TRANSIT-510.16VEHICLE

Origination Date: 02/24/2014

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- B. Fleet age – The age of the fleet can be used as an indicator for vehicle condition since newer vehicles show less wear and tear, and are usually less prone to premature service failure. OCTA fleet age varies from new to 15 years of age. The oldest vehicles are generally diesel powered and are assigned to the Contingency Fleet.
- C. Title VI/Environmental Justice Impact Assessments – As part of the vehicle assignment policy development, an assessment is conducted to measure the age of the vehicles at both the system and bus route level of detail. Minority routes, as defined in the most recent version of the Service and Fare Change Evaluation Policy, are reviewed and compared with Non-Minority routes to assess average vehicle age. Should a disparate impact or disproportionate burden be discovered, mitigation measures are used where possible to correct the imbalance. Mitigation measures may include reassignment of vehicles and/or bus routes between operating bases. Should mitigation measures not be immediately available, issues are documented and a remediation plan is developed to address the issue as new or replacement vehicles are produced.
- D. Advertisements – Using a vendor, OCTA sells exterior advertising on the revenue vehicle fleet. The majority of the advertising is randomly placed on buses that travel throughout the service area. As ads age, particularly those that advertise events on specific dates, new ads replace them. The placement of the advertising on OCTA revenue vehicles is not based on vehicle deployment; however, the Marketing Department may request that certain ads be operating in specific areas. This request is accommodated if it is operationally feasible and if the deployment supports an equitably distributed revenue vehicle fleet throughout the OCTA service area.
- E. Responsibilities – Multiple OCTA departments work together to implement this policy.
1. Maintenance Department:
 - i. Maintain and update vehicle records
 - ii. Publish updated Equipment Assignment Report each service change or when needed
 2. Scheduling Department:
 - i. Assist Maintenance Department with Equipment Assignment Report for each service change
 - ii. Assess vehicle age impacts and conformity annually with respect to Title VI and Environmental Justice communities and policies
 - iii. Assist with mitigation plan development, if necessary

Transit Division
VEHICLE ASSIGNMENT POLICY

Policy#: TRANSIT-510.16VEHICLE

Origination Date: 02/24/2014

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3. Planning Department:

- i. Identify Minority routes as required by Title VI and Environmental Justice regulations

4. Grants Department:

- i. Notify FTA of changes to the Equipment Assignment as may be required

5. Marketing Department:

- i. Oversee the placement of advertising on all revenue vehicles

VI. EXCEPTIONS

Not applicable.

VII. PROVISIONS AND CONDITIONS

Not applicable.

VIII. RELATED DOCUMENTS

FTA Circular 4702.1B

END OF POLICY

Composition of Minority and Non-Minority Routes

February 2017 Service Change

Route	Route Description	Total Route Length (miles)	Route Length (miles) within Minority Area	Percent of Route within Minority Area
1	Pacific Coast Highway	65.29	0.09	0.1%
21	Buena Park - Huntington Beach	28.46	10.88	38.2%
24	Malvern - Chapman	16.50	9.81	59.4%
25	Fullerton PNR - Huntington Beach	25.91	13.66	52.7%
26	Fullerton PNR - Yorba Linda	14.59	7.50	51.4%
29	La Habra - Huntington Beach via Beach	47.99	30.41	63.4%
30	Orangethorpe Avenue	24.13	13.01	53.9%
33	Magnolia Street	20.34	13.18	64.8%
35	Brookhurst Street	33.08	19.50	58.9%
37	Euclid Street	28.05	19.85	70.8%
38	La Palma Avenue	33.44	21.50	64.3%
42	Seal Beach to Orange via Lincoln	40.52	22.87	56.4%
43	Harbor Boulevard	30.62	23.11	75.5%
46	Ball Road	21.75	11.43	52.6%
47	Anaheim/Haster Fairview	36.65	23.75	64.8%
50	Katella Avenue	34.43	14.02	40.7%
53	Main Street	20.14	11.26	55.9%
54	Chapman Avenue	21.92	12.93	59.0%
55	Santa Ana - Costa Mesa - Newport Beach	28.92	13.08	45.2%
56	Garden Grove Boulevard	22.62	17.13	75.7%
57	Brea Mall - Newport Transportation Center	39.59	22.21	56.1%
59	Anaheim to Irvine	24.86	13.24	53.3%
60	Long Beach-Tustin via 17th/Westminster	36.32	19.14	52.7%
64	Huntington Beach-Tustin via Bolsa/1st	21.90	16.46	75.2%
66	Huntington Beach to Irvine	26.20	17.69	67.5%
70	Sunset Beach to Tustin Station	26.17	18.11	69.2%
71	Newport Beach-Yorba Linda via Tustin/Red Hill	32.85	10.45	31.8%
72	Sunset Beach-Tustin via Warner Avenue	25.29	14.35	56.7%
76	Huntington Beach-JWA via Talbert/MacArthur	20.74	8.74	42.2%
79	Tustin - Newport Beach	33.73	15.12	44.8%
82	Foothill Ranch - Rancho Santa Margarita	15.41	2.94	19.1%
83	Anaheim - Laguna Hills	47.47	33.29	70.1%
85	Mission Viejo - Dana Point	23.80	1.64	6.9%
86	Costa Mesa - Mission Viejo	32.78	6.60	20.1%
87	Laguna Niguel - Rancho Santa Margarita	27.92	4.72	16.9%
89	Laguna Beach - Mission Viejo	23.75	6.32	26.6%
90	Tustin Station to Dana Point Harbor	39.79	3.27	8.2%
91	Laguna Hills to San Clemente	27.77	6.50	23.4%
129	La Habra - Anaheim Canyon	16.49	6.23	37.8%
143	La Habra - Brea via Fullerton	15.54	8.08	52.0%
150	Santa Ana - Costa Mesa	15.96	13.86	86.9%
153	Strickland MILZ former North end of 053	14.43	7.59	52.6%
167	Anaheim-Irvine via Santiago/Hewes/Bryan	36.06	12.93	35.8%
177	Foothill Ranch - L.H.T.C.	17.01	6.81	40.0%
178	Huntington Beach-Irvine via Adams/Birch/Campus	22.94	3.48	15.2%
543	Harbor Blvd using Limited Stops	22.14	21.45	96.9%
560	Long Beach-Tustin via 17th/Westminster	30.47	17.83	58.5%

Attachment L

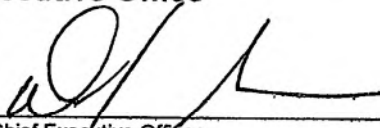
Route	Route Description	Total Route Length (miles)	Route Length (miles) within Minority Area	Percent of Route within Minority Area
206	Santa Ana - Lake Forest	37.23	22.22	59.7%
211	Seal Beach - Irvine	37.67	8.89	23.6%
213	Brea PNR - Irvine	68.62	36.75	53.6%
453	Orange Transp Center - St. Josephs' Hospital	3.48	1.02	29.4%
462	Santa Ana Regional Transp - Santa Ana Civic Center	3.23	3.23	100.0%
463	Santa Ana Regional Transp. Cntr & Harbor-Sunflower	16.42	13.29	80.9%
472	Tustin Metrolink Station -Irvine Business Complex	12.28	4.40	35.8%
473	Tustin Station -Irvine Business Complex	9.86	5.63	57.1%
480	Irvine Station - Lake Forest	12.03	3.22	26.8%
701	Huntington Beach - Los Angeles	78.37	5.52	7.0%
721	Fullerton-Los Angeles	64.43	8.76	13.6%
794	Riverside/Corona - C Mesa (via S Coast Metro)	74.33	16.21	21.8%

Service & Fare Change Evaluation Policy

Revised July 20, 2017



Executive Office


Chief Executive Officer


Deputy CEO

SERVICE AND FARE CHANGE EVALUATION POLICY

Policy#: EO-520.02SERVICE

Origination Date: 11/26/2012

Revised Date: 07/20/2017

I. PURPOSE

The purpose of this policy is to establish how the Orange County Transportation Authority (OCTA) evaluates major service and fare changes to determine whether they will have a discriminatory impact based on race, color, or national origin and whether they will have a disproportionately high and adverse impact on minority populations and/or low income populations.

II. ORGANIZATIONAL UNITS AFFECTED

- A. The Planning Division is responsible for determining if a particular service change meets the definition of a "Major Service Change."
- B. The Planning Division is responsible for completing service equity analysis documents as required.
- C. The Finance and Administration Division is responsible for completing fare equity analysis documents as required.
- D. The External Affairs Division is responsible for engaging the public to actively seek comments, suggestions, and input in the decision making process for both major service changes and fare changes through community outreach efforts as outlined in the Public Involvement Plan.
- E. The Human Resources & Organizational Development Division is responsible for coordinating FTA review of service and fare equity analysis documents.

III. POLICY

- A. Major Service Change – A major service change is defined as a numerical standard, as expressed by the distribution of routes as measured against the existing level of service. The following is considered a Major Service Change (unless otherwise noted in Section VI):
 - 1. Route Alignment Reduction or Elimination
 - a) Reducing an existing route by more than 50% of directional route miles or; reducing an existing route by more than 50% of bus stops.
 - 2. Route Alignment Extension or New Route
 - a) Adding a new route or a route segment that increases directional route miles of an existing route by more than 50% and; when more than 50% of the new service bus stops are along currently unserved street segments.
 - 3. Route Level Service Hour Change
 - a) Increase or decrease of the following levels of service on a route within 12 months:

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Policy#: EO-520.02SERVICE

Origination Date: 11/26/2012

Revised Date: 07/20/2017

- i. Weekday Service increase or decrease of 25% or more annualized Vehicle Revenue Hours, or Weekend Service increase or decrease of 25% or more annualized Vehicle Revenue Hours.
- 4. System-Wide Service Hour Change
 - a. Increase or decrease of 25% of annualized Vehicle Revenue Hours for all routes within 12 months
- B. Fare Change – All fare increases or reductions are considered a Fare Change unless otherwise noted in Section VI.
- C. Disparate Impact/Disproportional Burden Thresholds – When conducting a fare or service equity analysis, the following thresholds will be used to determine when a change would have a disparate impact:
 - 1. Service Changes
 - a) Route Alignment Reduction or Elimination
 - i. If the resulting alignment of a route alignment reduction serves a lower percentage of minority and/or low income population than the existing route alignment service coverage or; if an identified low income and/or minority route is eliminated.
 - b) Route Alignment Extension or New Route
 - i. If a new route alignment after the proposed alignment extension serves a lower percentage of minority and/or low income population than the average minority and/or low income population for the entire service area or; if a new route serves a lower percentage of minority and/or low income population than the average minority and/or low income population for the entire service area.
 - c) Route Level Service Hour Change
 - i. If a proposed route level headway for a minority and/or low income route is longer than the average headway for non-minority and/or non-low income routes for the same service type and time period; or if a proposed route level headway for a non-minority and/or non-low income route is shorter than the average headway for minority and/or low income routes for the same service type and time period.
 - d) System-Wide Service Hour Change
 - i. If the proposed average system-wide headways for minority and/or low income routes is longer than the average system-wide headways for non-minority and/or non-low income route for the same service type and time period; or if the proposed average system-wide headways for non-minority and/or non-low income routes is shorter than the average headway for minority and/or low income routes for the same service type and time period.
 - 2. Fare Change
 - a) Disparate impact/disproportional burden will only be considered if the increase in fare product for minority and/or low income populations is greater than 10% compared to non-minority and/or low income.

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SERVICE AND FARE CHANGE EVALUATION POLICY

Policy#: EO-520.02SERVICE

Origination Date: 11/26/2012

Revised Date: 07/20/2017

- D. Public Involvement – The public was engaged in developing this policy as documented in the Public Involvement Plan. The public will be engaged in any changes to this policy prior to approval. The Public Involvement Plan also documents the outreach activities required prior to a major service or fare change.
- E. Board Review – Service and Fare Equity Analysis documents will be presented to the OCTA Board prior to implementation of major service or fare changes. The documents will be presented to the Transit Committee as a receive-and-file report.

IV. DEFINITIONS

- A. Disparate Impact – A facially neutral policy or practice that has a disproportionately excluding or adverse effect on the minorities or low income segments of the service area.
- B. Disparate Treatment – An action that results in a circumstance in which minority persons are treated differently than others because of their race, color, national origin, and/or low income status.
- C. Disproportional Burden – The statistical percentage of impacts borne by low income populations as compared to impacts borne by non-low income populations.
- D. Low Income persons have an income of 80% or less of the national per capita income. "Low Income Areas" are residential land use areas within census tracts where the average per capita income is 80% or less of the national per capita income.
- E. Low Income Transit Route – A route where at least 20% of the land within one-half mile of the route alignment is a "Low Income Area."
- F. Minority Persons and Areas – Minority persons include American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, and Native Hawaiian and Other Pacific Islanders as defined in the latest FTA Title VI Circular. "Minority Areas" are residential land use areas within census tracts where the percentage of minority persons is higher than the Orange County average.
- G. Minority Transit Route – A route where at least 25% of the land within one-half mile of the route alignment is a "Minority Area."
- H. Seasonal Service and Special Events – Changes to bus service levels on routes which occur because of seasonal ridership changes and event activities served by dedicated temporary bus routes. Routes which have these changes are documented in OCTA's current Title VI plan.
- I. Temporary Detours and Closures – A short-term change to a route caused by road construction and maintenance, road closures, emergency road conditions, fiscal crisis, civil (and labor) disputes, any other uncontrollable circumstance when the route will be returned to the prior state after the circumstance has been resolved.

V. PROCEDURE

- A. Each service change is evaluated to determine if it is "major" and does not meet an exception in Section VI, therefore requiring an equity analysis. If a service change is

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- not determined to be "major," it will be noted and no further analysis will be completed. All fare changes require an equity analysis unless it meets an exception in Section VI.
- B. Prepare service and fare equity documents as necessary using the current procedures on file with the Planning and/or Finance and Administration Division.
 - C. Engage in public participation efforts (see Public Involvement Plan for Service and Fare Changes.)
 - D. Submit completed Service and/or Fare Equity Analysis documents to the FTA via the TrAMS portal.
 - E. Submit Service and/or Fare Equity Analysis documents to the OCTA Office of Civil Rights.
 - F. Submit Service and/or Fare Equity Analysis documents to the OCTA Board of Directors as described in Section III.

VI. EXCEPTIONS

- A. The following are exemptions to the Major Service Change Policy and do not require an equity analysis:
 - 1. Seasonal service changes
 - 2. Temporary detours and closures
 - 3. Adjustments to lines during their first three years of service including elimination of service
 - 4. Splitting or combining routes where the changes would not otherwise constitute a major service change.
 - 5. Route being taken over by another transit provider with substantially the same headways, fare, transfer options, span of service, and stop locations. The new provider must take all valid OCTA fare media.
 - 6. Special event services operating for a limited period of time (less than seven consecutive months)
 - 7. Shuttle routes designed to act as extensions of commuter rail service, linked to specific commuter rail schedules established by the commuter rail operator
 - 8. Trial service changes instituted for 180 days or less with notification to the FTA Region 9 administrator in advance of implementation
 - 9. Service changes implemented in response to an emergency situation with notification to the FTA Region 9 administrator within five working days
- B. The following are exceptions to the Fare Change Policy and do not require an equity analysis:
 - 1. Free fare or reduced fare promotions of less than 60 days
 - 2. Seasonal passes and fares which have been reviewed for equity previously at the same proposed rate

VII. PROVISIONS AND CONDITIONS

Not applicable.

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VIII. RELATED DOCUMENTS

- A. FTA Circular 4702.1B
- B. FTA EJ Circular 4703.1
- C. OCTA Public Involvement Plan
- D. Service Change Equity Evaluation Process
- E. Fare Change Equity Evaluation Process

END OF POLICY