



WELCOME!

To MCTS' Public Meeting
to Seek Feedback on Title VI Equity
Standards and Guidelines.

Thank you for attending this MCTS public meeting. We appreciate your feedback on setting up our guidelines for transit service and fare changes. Your feedback will help us in answering questions like, "If MCTS had to make changes to bus service, what would be fair to all individuals?"

As a recipient of federal funds, MCTS complies with Title VI of the Civil Rights Act of 1964, Presidential Executive Order 12898, and Federal Transit Administration (FTA) Circular 4702.1B. This is designed to ensure that changes to transit service and changes to transit fares are not discriminatory to minorities or low-income individuals.

As part of this process, MCTS develops internal policies that guide us when fare or service changes are proposed. Those policies are:

- **Major Service Change:** the policy that defines the level at which MCTS, the public and its riders consider a major service change.
- **Disparate (Unequal) Impact:** the policy that defines when a change in MCTS service or a fare change unfairly (disproportionately) affects members of a group identified by race, color or national origin.
- **Disproportionate (Unequal) Burden:** the policy that defines when a low-income population is affected more by service or fare changes than a non-low-income population and how MCTS will evaluate alternatives and ease burdens when possible.

Comments will be accepted at this public information meeting, as well as online at RideMCTS.com or via mail. Comments will be accepted through October 15th, 2013. MCTS will then take the comments received into consideration when drafting the final policy definitions. Details on where comments can be submitted can be found on the handout you received when you arrived at the welcome desk.

About This Meeting

There are four stations, each with different information:

- 1) Introduction to Title VI and the process**
- 2) Major Service Change**
- 3) Disparate Impact & Disproportional Burden**
- 4) Conclusion**



Please explore each station and offer your comments. This meeting is designed to collect your comments on MCTS' definition of a Major Service Change, as well as MCTS' Disparate Impact & Disproportional Burden Policies. At each of these stations, MCTS staff will be available to answer any questions you may have about the information presented.

There are various ways that you may share your comments with us:

- Share your comments with our staff members, who will officially record them
- Write down your comments on the survey forms that you received when you arrived
- Visit our website RideMCTS.com and submit comments online
- Mail your comments to us by addressing them to:

TITLE VI
MILWAUKEE COUNTY TRANSIT SYSTEM
1942 N 17TH STREET
MILWAUKEE WI 53205

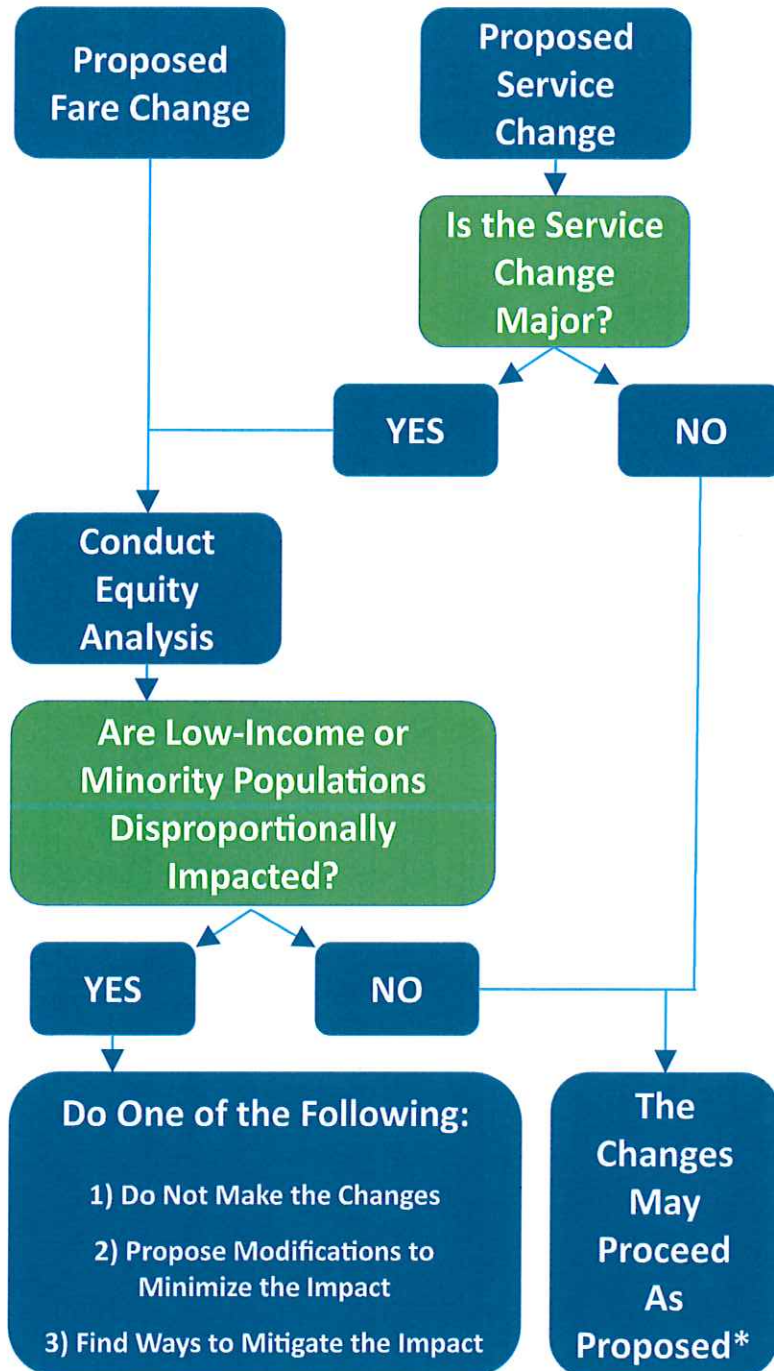
Your feedback will be accepted until October 15th, 2013. Using public feedback as guidance, MCTS will then formulate final policies which will be presented to the Milwaukee County Board for formal adoption.

What this meeting is not about:

No specific service or fare changes are being proposed at this time. The goal of this meeting is to set equity policies that relate to future fare and service proposals. Unfortunately, due to limited time, only comments relating to these policies will be recorded as part of the official record; however, if you wish to comment about other transit concerns please see a staff member in the center of the room.

Fare and Service Equity Analysis Process

The following flowchart illustrates the steps that MCTS must follow when proposing a fare or service change based on the guidelines from Title VI of the Civil Rights Act of 1964. The questions below in green ("Is the service change major?" and "Are low-income or minority populations disproportionately impacted?") are the focus of this meeting. MCTS is seeking your input about what should constitute a "Major Service Change" and input on the policies that determine when low-income or minority populations are disproportionately impacted by such changes.



Whether a service change is considered "major" is determined by MCTS' Major Service Change Policy. If the proposed changes do not meet the policy thresholds then the changes are not considered major may occur as planned.

All proposed fare changes must be analyzed, regardless of how minor the proposed changes are.

MCTS' Disparate Impact Policy is the threshold that determines if minority populations are disproportionately impacted by the changes.

MCTS' Disproportionate Burden Policy is the threshold that determines if low-income populations are disproportionately impacted by the changes.

Each policy can use the same thresholds, or they can differ. MCTS currently uses the same threshold for both.

If a proposed change result in a disproportionate impact, MCTS will consider modifying the proposed change to avoid, minimize or mitigate the disproportionate burden of the change. Any modifications to the original proposal wil then be re-evaluated.

If MCTS chooses not to alter the proposed changes, the agency may still implement the change if there is substantial legitimate justification for the change and the agency can show that there are no alternatives that would have less on an impact and would still accomplish the agency's legitimate program goals.

*-See "MCTS fare and service change approval process" board for more information.

MCTS Major Service Change Policy

MCTS defined a major service change in June of 2009 as a change that meets at least one of the following conditions (these guidelines were chosen based on information provided in Federal Transit Administration (FTA) Circular 4702.1A):



- 1) affects 25% of the bus hours on a route or group of routes**
- 2) affects 25% of the one-way mileage of a route or group of routes**
- 3) affects 25% of the service span**
- 4) reduces the frequency of service by 50%**
- 5) creates a gap of greater than one-half mile from the nearest alternative service**

The following are not considered “major service changes”: short-term seasonal changes, temporary changes resulting from construction activity, changing a route number or other designation, change or discontinuation of demonstration or experimental service within the first year, service changes on special service routes, or changes resulting from an emergency situation.

These guidelines apply to any service addition, expansion, reduction, adjustment, or reallocation. It is important to remember that the definition should truly reflect what is considered a major change that has the potential to affect many people, rather than minor changes which may only impact a limited number of people.

This policy does not determine what kinds of service changes that MCTS can, or cannot, engage in. This policy simply determines when proposed changes require MCTS to conduct an equity analysis. If an equity analysis is conducted, and the results show that there are no disproportionately negative impacts to minority or low-income populations, then MCTS can proceed with the changes. Similarly, if a proposed change is not considered “major” then MCTS may also proceed with the changes.

Examples of Service Changes (1 of 2)



Affects 25% of the bus hours on a route or a group of routes:

What are "Bus Hours"?

A bus route has multiple buses going back and forth along the route all day.

A route's total "bus hours" is the total of the time that each vehicle is on the road.

For the following examples, suppose a bus route has 3 buses going back and forth all day (see right).

Bus Number	Time the bus leaves the garage to the time it returns	Bus Hours
1	6am to 6pm	12
2	6am to 7pm	13
3	7am to 7pm	12

The total bus hours for the route is 37 (12+13+12). In order for a major service change to occur, the bus hours would have to increase or decrease by more than 9.25 hours (25% of 37 hours).

Based on this policy, would a major service change equity evaluation be needed if...

- another bus was added to this route from 7am to 7pm (12 more hours)? **Yes**
- bus number 3 was removed from this route (12 less hours)? **Yes,**
- another bus is added to this route from 7am to 11am (4 more hours)? **No**

Affects 25% of the one-way mileage of a route or a group of routes:

What is "One-Way Mileage"?

One-way mileage is the distance in miles from one end of a route to the other.

For the following examples, if a route was 10 miles long, a major change would occur if more than 2.5 miles of the route were added, removed, or changed (25% of 10 miles is 2.5 miles).



Based on this policy, would a major service change equity evaluation be needed if...

- the route was shortened by 2 miles? **No**



- the route was shortened by 4 miles? **Yes**



- the route remains 10 miles; however, 4 miles of the route are diverted to a different street? **Yes** (more than 2.5 miles of the route are "affected" (changed) in this situation)



Examples of Service Changes (2 of 2)



Affects 25% of the service span:

What is the "Service Span" of a route?

The service span is the time of the first bus of the day on a route until the time of the last bus of the day on the route. For example, if the first bus on a route left at 5am and the last bus on the same route was at 11pm then the service span of that route would be 18 hours (5am to 11pm).

For the following examples, if the service span of a route was 18 hours (from 5am to 11pm), then an increase, or a decrease, of 4.5 hours would be considered a major service change (25% of 18 hours is 4.5 hours).

Based on this policy, would a major service change equity evaluation be needed if the route is modified to operate from...

- 5am to 7pm (14 hours, a span reduction of 4 hours)? **No**
- 5am to 6pm (13 hours, a span reduction of 5 hours)? **Yes**
- 4am to 1am (21 hours, a span increase of 3 hours)? **No**
- 4am to 3am (23 hours, a span increase of 5 hours)? **Yes**

Reduces the frequency of service by 50%:

What is a route's "Frequency of Service"?

At any location, a route's frequency of service is the number of minutes it takes after one bus leaves until the next bus leaves. This is also known as a route's headway.

For example, if a route has a 20-minute frequency of service (a bus shows up every 20 minutes), it would be considered a major service change if the frequency of service was reduced to every 30 minutes or greater (50% of 20 minutes is 10 minutes. If the frequency is already 20 minutes then reducing it an additional 10 minutes between buses would become 30 minutes).

Creates a gap of greater than one-half mile from the nearest alternative service:

If service is eliminated, it is important that customers have alternative services that they can use. If none are available, it creates a significant hardship on the customer's ability to get where they need to go. For example:

- If two routes are operating on the same street, and one of them is eliminated, passengers may still be able to use the other route that would still be operating on that street. This would not be considered a major service change because **the affected people would still have transportation.**
- If only one route operated on a street, and it was a **one-mile walk to the next closest route**, then it would be a major service change for passengers to no longer serve this street. In this situation, the affected customers could find themselves without access to transportation.

MCTS Disparate Impact Policy



What is “Disparate Impact”?

It is unintentional discrimination. For MCTS, it is when a fare or service change negatively affects minority populations more than non-minority populations.

MCTS proposes to establish this Disparate Impact policy in compliance with applicable federal requirements (Executive Order 12898 and FTA Circular 4702.1B).

MCTS uses the four-fifths rule (also known as the 80% rule) as the threshold for its Disparate Impact policy.

Please see the special display board for an understanding of how the four-fifths rule is calculated.

If a proposed change results in exceeding this threshold, MCTS will attempt to minimize or mitigate the impact that the changes have on minority populations. MCTS can also decide to no longer proceed with the change. Please see the Fare and Service Equity Process board for more information.

MCTS Disproportionate Burden Policy



What is “Disproportionate Burden”?

It is when a fare or service change negatively affects low-income populations more than non-low-income populations. MCTS defines low income as being below the US poverty guidelines.

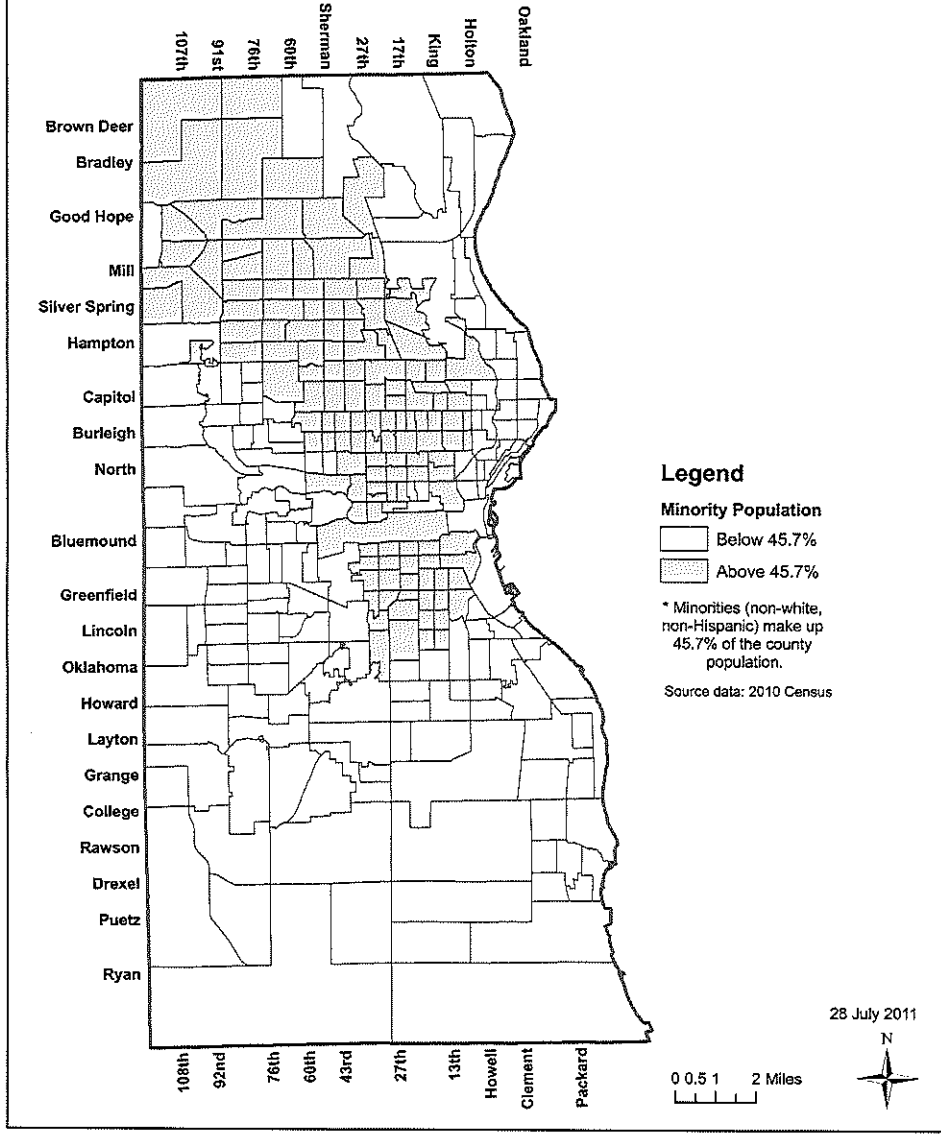
MCTS proposes to establish this Disproportionate Burden policy in compliance with applicable federal requirements (Executive Order 12898 and FTA Circular 4702.1B).

MCTS uses the four-fifths rule (also known as the 80% rule) as the threshold for its Disproportionate Burden policy.

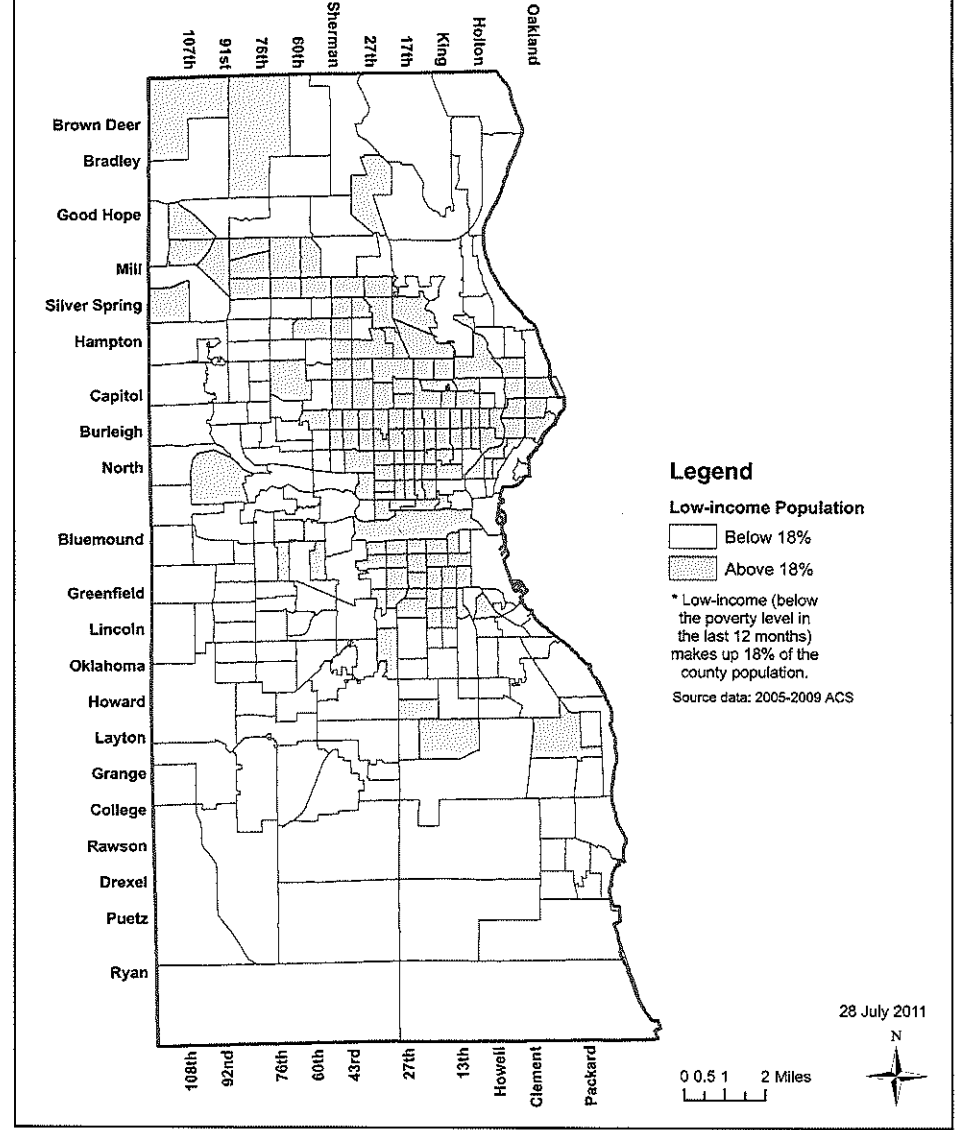
Please see the special display board for an understanding of how the four-fifths rule is calculated.

If a proposed change results in exceeding this threshold, MCTS will attempt to minimize or mitigate the impact that the changes have on low-income populations. MCTS can also decide to no longer proceed with the change. Please see the Fare and Service Equity Process board for more information.

Minority Population by Census Tract Compared to Milwaukee County Minority Population



Low-Income Population by Census Tract Compared to Milwaukee County Low-Income Population



What is the Four-Fifths Rule?



The four-fifths rule, also known as the 80% rule, is a method of calculating how much one group is impacted when compared to another group. Specifically, when using this threshold, a disparate impact or disproportionate burden has occurred when the ratio of the reduction in service to the minority (or low-income) population compared to the non-minority (or non-low-income population) is below four-fifths (80%). The easiest way to understand this is through some examples:

Example 1:

- A low-income area has 50 buses passing through (bus trips) per day and there is a proposal to remove 5 trips. This is 90% of the level of service that originally operated. ($45 \div 50 = 90\%$)
- A non-low-income area has 20 trips per day and there is a proposal to remove 3 trips. This is 85% of the level of service that originally operated. ($17 \div 20 = 85\%$)

To determine if this example violates the four-fifths rule, take the low-income area's outcome (90%) and divide it by whichever group has the highest outcome (in this case the low-income area has the highest outcome with 90%). If the results are less than 80% then there is a violation.

In this case: $90 \div 90 = 100\%$ so there is not a violation.

Example 2:

- A minority area has service from 6am to 10pm (a service span of 16 hours) per day and there is a proposal to end service at 6pm instead (6am to 6pm is a service span of 12 hours). This is 75% of the service span that originally operated. ($12 \div 16 = 75\%$)
- A non-minority area has service from 6am to 6:30pm (a service span of 12.5 hours) per day and there is a proposal to end service at 6pm instead (6am to 6pm is a service span of 12 hours). This is 96% of the service span that originally operated. ($12 \div 12.5 = 96\%$)

To determine if this example violates the four-fifths rule, take the minority area's outcome (75%) and divide it by whichever group has the highest outcome (in this case the non-minority area has the highest outcome with 96%). If the results are less than 80% then there is a violation.

In this case: $75 \div 96 = 78\%$ so there **IS** a violation.

How is the Disparate Impact Policy calculation different from the Disproportionate Burden Policy?

The only difference is the population group that they apply to. Disparate Impact applies to minority populations while Disproportionate Burden applies to low-income populations. MCTS has chosen to use the four-fifths rule as the threshold for both of its policies; therefore, they are both calculated the same based on the population group that they represent.



THANK YOU!

**Your participation today
gave us important feedback.**

Thank you for attending this Milwaukee County Transit System public meeting. The information received will be combined with a study of MCTS' current practices to be shared with the Milwaukee County Board in the form of a policy recommendation. Upon approval from the Milwaukee County Board, MCTS will have a comprehensive, publicly evaluated Title VI policy.

Future decisions about transit service or fare changes will be evaluated using the policies that you helped form to ensure that changes are distributed equitably to minority and low-income populations and are not discriminatory.

Please place your completed survey forms in the boxes located at each station.

Questions? Ask an MCTS representative or contact us by mail:

TITLE VI
MILWAUKEE COUNTY TRANSIT SYSTEM
1942 N 17TH STREET
MILWAUKEE WI 53205

(414) 344-4550

Materials from this meeting will also be posted at RideMCTS.com

-Milwaukee County Transit System