

## BOARD APPROVED POLICY

Version: 3

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Next Review: Triennially or Substantive Change  
Owner: Not Assigned

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### 1.0 Title VI Program Policies

In accordance with the Federal Transit Administration's ("FTA") Title VI Circular 4702.1B effective October 1, 2012, Rochester Genesee Regional Transportation Authority ("RGRTA" or "the Authority") sets forth the following policies for RTS fixed routes to demonstrate compliance under Title VI of the Civil Rights Act of 1964:

- Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy
- Monitoring Criteria for the Level of Service and Quality of Service

### 2.0 Definitions

- **Adverse Effect** shall be related to changes in transit service and shall be measured by the changes between the existing and proposed service levels that are deemed significant. Both reductions and additions in service levels may be deemed adverse depending on the degree of "disparate impact."
- **Authority** and **RGRTA** each mean the Rochester Genesee Regional Transportation Authority and its wholly controlled subsidiaries (RTS, RTS Access, RTS Genesee, RTS Livingston, RTS Ontario, RTS Orleans, RTS Seneca, RTS Wayne, and RTS Wyoming).
- **Disparate Impact** shall mean a facially neutral policy or practice that disproportionately affects members of a group identified by race, color or national origin, where (i) the recipient's policy or practice lacks a substantial legitimate justification; and where (ii) there exists one or more alternatives that would service the same legitimate objectives, but with less disproportionate effect on the basis of race color or national origin.
- **Disproportionate Burden** shall mean an adverse effect that places greater burden on a Low-Income Population versus other economic population groups.
- **Low-Income Customer** shall mean an individual whose family income falls within the poverty guidelines, which are a simplified version of the federal poverty thresholds issued each year by the Department of Health and Human Services (HHS).
- **Low-Income Population** shall mean any readily identifiable group of Low-Income Customers who live in geographic proximity.
- **Major Service Change** shall mean a change or changes in any route other than a subsidized route extension, an experimental route, or an express transfer service route that either changes the number of service hours operated on a route by 25% or more; OR changes the length of the route structure by 25% or more. Route structure refers to the length of a route based on map coverage rather than based on vehicle miles.
- **Minority Customers** shall mean RTS customers identifying as any of the groups identified through the RTS fixed route customer surveys or citing a place other than the United States as nation of origin. The groups include: Black or African American, Asian, American Indian/Alaskan Native, Hispanic or Latino or Spanish, or Middle Eastern.
- **Minority Customer Routes** shall mean those RTS routes that have at least one-third of the revenue miles located in Census block groups where the minority population percentage exceeds the average minority population percentage in the service area. RGRTA may adjust this classification if route-specific ridership data shows that ridership characteristics do not reflect the characteristics of the census blocks through which the route travels.
- **Minority Population** shall mean any readily identifiable group of "minority customers" who live in geographic proximity.

## BOARD APPROVED POLICY

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- **Route Extension** shall mean a spur off the trunk line of a route designed to transport customers to a specific location not serviced by the trunk line. A route extension may or may not be created through a subsidy agreement with a strategic business partner.
- **RTS Connect:** shall mean the customer facing brand name for the fixed route bus service RTS provides in Monroe County.
- **RTS On Demand:** shall mean the customer facing brand name for the demand responsive transit service RTS provides in Monroe County in specific geographic locations designated as On Demand Zones.

### 3.0 Major Service Change Policy

Major Service Change shall mean a change or changes in any RTS fixed route other than a subsidized route extension, an experimental route, or an express transfer service route that either changes the number of service hours operated on a route by 25% or more; OR changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

1. The Title VI Equity Analysis shall evaluate Disparate Impact, Disproportionate Burden, Level of Service, and Quality of Service for affected RTS fixed routes.
2. The Title VI Equity Analysis completed for a Major Service Change or fare change must be presented to the RGRTA Board of Commissioners and included in the RGRTA Title VI Program Plan with a record of action taken by the Board.

### 4.0 Title VI Equity Analyses

#### 4.1. Disparate Impact Policy

Any time a Major Service Change or fare change to one or more RTS fixed routes poses a difference in Adverse Effect on Minority Customers versus non-minority customers greater than  $\pm 20\%$  above or below the system average for Minority Customers, the change shall be deemed to have a Disparate Impact.

The 20% threshold shall be based on analyses of RTS customer demographic data and an evaluation of the standard deviation of the route level statistics as compared to the system average. RGRTA excludes subsidized routes from this policy, since RGRTA will not provide such service unless a third party will pay for the service.

In the event the proposed action has a negative impact that affects Minority Customers more than non-minority customers with a disparity that exceeds the adopted Disparate Impact Threshold, or that benefits non-minority customers more than Minority Customers with a disparity that exceeds the adopted Disparate Impact Threshold, RGRTA must evaluate whether there is an alternative that has a more equitable impact.

Otherwise, RGRTA must take measures to mitigate the impact of the proposed action on the affected Minority Customers and demonstrate that both a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

#### 4.1.A. Details about the Threshold

The threshold of 20% was arrived at by first identifying the percentage of wholly or partially minority customers utilizing each route in the system (during a one (1) year period, based on (4) quarterly surveys) and then comparing those values to the percentage of wholly or partially minority customers throughout the system. We observed the standard deviation of these variances. Statistical significance was deemed to be  $\alpha = 0.10$  for a 1-tail test (giving us a z-score of 1.282). The standard deviation of the observed variances was 15.7%, giving us a threshold percentage of +/- 20.1%. For simplicity, we have standardized this to 20%.

BOARD APPROVED POLICY

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**4.2. Disproportionate Burden Policy**

Any time a Major Service Change or fare change to one or more RTS fixed routes poses a difference in Adverse Effect on a Low-Income Population versus a non-low-income population of  $\pm 20\%$  above or below the system average for Low-Income Customers, it shall be deemed to have a Disproportionate Burden.

The 20% threshold shall be based on analyses of RTS customer demographic data and an evaluation of the standard deviation of the route level statistics as compared to the system average.

RGRTA excludes subsidized routes from this policy, since RGRTA will not provide such service unless a third party will pay for the service.

In the event the proposed action has a negative impact that affects Low-Income Customers more than non-low-income customers with a burden that exceeds the adopted Disproportionate Burden Threshold, or that benefits non-low-income customers more than Low-Income Customers with a burden that exceeds the adopted Disproportionate Burden Threshold, RGRTA must evaluate whether there is an alternative that has a more equitable impact.

Otherwise, RGRTA must take measures to mitigate the impact of the proposed action on the affected Low-Income Customers and demonstrate that a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

*4.2.A. Details about the Threshold*

The threshold of 20% was arrived at by first identifying the percentage of customers with household incomes below \$15,000 annually utilizing each route in the system (during a one (1) year period, based on (4) quarterly surveys) and then comparing those values to the percentage of customers with household incomes below \$15,000 annually throughout the system. We observed the standard deviation of these variances. Statistical significance was deemed to be  $\alpha = 0.10$  for a 1-tail test (giving us a z-score of 1.282). The standard deviation of the observed variances was 15.3%, giving us a threshold percentage of  $\pm 19.6\%$ . For simplicity, we have standardized this to 20%.

**5.0 Title VI Service Monitoring**

RGRTA shall monitor the performance of the Minority Customer routes versus non-minority customer routes within the RTS fixed route system, relative to the system-wide criteria defined for the level of service and quality of service on the fixed routes.

**5.1. Criteria for Level of Service**

This section shall set forth the criteria designed to ensure the level of service on RTS fixed routes is comparable on Minority Customer Routes and non-minority customer routes.

*5.1.A. Vehicle Load*

The load condition defines the minimum and maximum customer occupancy level for service operated by RTS. The load standard is expressed as a percentage of the number of customers compared to the vehicle seating capacity. Load conditions are defined individually for each of the route classifications in the system. Load calculations are based on aggregations of customer counts by half-hour period for Core Frequent and Local routes. Load calculations are based on the average of the maximum load for all trips in a given direction during a peak time period.

RTS uses a service planning capacity of 120% of seated capacity on all routes while strictly abiding by the federal crush capacity of 150% of seated capacity. For routes identified as commuter service, based on the FTA definition, we strive to limit the load to 100% of seated capacity whenever it is operationally feasible. RTS will exclude vehicle loads less than 80% seated capacity because they will not trigger a disparity. In terms of

BOARD APPROVED POLICY

monitoring the level of service, there is no disparity for vehicle load when the calculated percentage is less than 20% of the system average or 20% below the system average; as this simply shows there are fewer people on the buses and more empty seats.

**5.1.B. Headway**

The frequency of service for each RTS route shall be determined by the ridership on each route, and the ability to meet other performance measures, such as on-time performance and pass-up frequency. Routes are required to meet a minimum headway in order to provide a convenient and effective service for customers.

	Weekdays		Weekends and Holidays	
	Early Morning 5 AM – 6 AM Evening 6 PM – Midnight	Daytime 6 AM – 6 PM	Early Morning 6 AM – 7 AM Evening 6 PM – Midnight	Daytime 7 AM – 6 PM
Core Frequent Network	30 minutes	15 minutes	60 minutes	30 minutes
Core Local Network	60 minutes	30 minutes	60 minutes	60 minutes
Suburban	120 minutes	120 minutes	120 minutes	120 minutes
Seasonal*	60 minutes	30 minutes	60 minutes	60 minutes
Crosstown	60 minutes	30 minutes	60 minutes	60 minutes
Commuter	1 to 2 Trips	N/A	N/A	N/A

\*The Seasonal route is a Suburban service type with the same frequency as the Core Local Network.

The minimum headways established above are the minimum service levels only. The maximum headways shall be determined by the ridership and other performance measures. Routes that do not have sufficient ridership to sustain the minimum headway will be subject to route analysis and observation by the Planning Department, Scheduling Department, and the Service Development Committee. The redesigned service does not have traditional peak and off-peak periods. The closest conceptual “peak” service time is Daytime (6:00 AM to 6:00 PM). As a result, the Early Morning (5:00 AM to 6:00 AM or 6:00 AM to 7:00 AM) and Evening (6:00 PM to Midnight) periods would be equivalent to off-peak service times. The headway for each route shall be driven by these established service times.

Weekend and Holiday service runs Saturdays, Sundays, and major holidays (New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day). All other holidays shall operate on the normal schedule for that day of the week.

In very limited instances and with as much public notice as possible, changes/additions/revisions to these headway standards may be made to accommodate temporary operational requirements or special events.

**5.1.C. Service Availability**

Access to the transit system is expressed in terms of the travel time required for a customer to get from his/her point of origin to the nearest bus stop. An individual is generally regarded to have good access to the transit system if the nearest stop is no more than 5 minutes travel time from the point of origin. RTS strives to employ a route structure such that 95% of all residents living in areas of urban density (greater than 3,600 persons per square mile) are afforded walk-on access to the bus and 95% of all residents of suburban areas are afforded automobile access to the bus.

In terms of distance, walk-on access is available to persons residing within ¼ mile of a bus route (5 minutes at 3 mph average walking speed). Auto access is available to persons living up to 2 ½ miles from a route (5 minutes at 30 mph average driving speed). In terms of bus stops, persons living in areas of urban density are afforded at least 4 bus stops per mile and persons living in suburban areas are afforded bus stops not more than 2 miles apart.

**5.1.D. On-Time Performance**

RGRTA has established standards for on-time performance that will enable the Authority to maintain a reasonable, high quality service. RGRTA's on-time performance indicator is designed to provide quality service

BOARD APPROVED POLICY

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and provides bus operators with realistic performance goals as defined in the most current Comprehensive Plan.

For the purposes of calculating on-time performance, a bus will be considered on time if the arrival time at a time point falls within a certain range of the scheduled time. RTS fixed route service currently uses the following range: *A bus will be considered on-time if it arrives at a time point between 2:00 (two minutes and zero seconds) early, and 5:00 (five minutes and zero seconds) of the scheduled arrival time.* If the arrival time at a time point falls outside of this range, the bus will then be considered late or early, depending on which side of the range it falls on.

RTS will strive to maintain reasonable on-time performance standards. The on-time performance range set forth in the Comprehensive Plan shall be considered a minimum only.

**5.2. Criteria for Quality of Service**

This section shall set forth the criteria designed to ensure the quality of service on RTS fixed routes is comparable on Minority Customer Routes and non-minority customer routes.

**Note: The Authority considers On Time Performance as a measure of service quality. However, the FTA Circular 4702.1B identifies on time performance as a Service Policy requirement. As a result, on time performance appears in this document under Service Standards rather than under the Service Policies to monitor quality of service.**

*5.2.A. Distribution of RTS Amenities*

RGRTA will allow and distribute amenities at selected bus stops and shelters throughout the RTS fixed route service area on an as-needed basis. Amenities may include ATIS signs, bus shelters, benches, trash bins, bike racks, map display, special lighting, or any items or services that would not normally be found at a typical bus stop.

ATIS signs are installed at bus stops where there is a minimum of 200 boardings per day, and shelters (including benches) are installed where there is a minimum of 50 boardings per day. Other amenities are installed on an as-needed basis and may be influenced by other factors such as business partner contributions, new development, and/or the level of other types of traffic. Existing shelters needing replacement will be replaced provided there is a minimum of 25 boardings per day and there have not been three or more incidents of vandalism with a six-month period.

RTS contracts the installation and maintenance of shelters. The Planning Department manages the location and upkeep of shelters and other amenities. This data is stored in a Bus Stop Manager Database and the Trapeze system. Amenities may be installed by entities other than RTS. In these cases, the entity that has purchased and installed those amenities shall be responsible for their upkeep and removal, should that become necessary. RTS shall assume no responsibility for such amenities.

The redesigned fixed route system places emphasis on network connections and an improvement in overall customer mobility. This includes both stronger connections between fixed routes and the integration of demand response service in the On Demand Zones with the core fixed-route transit network. To facilitate these various connections, RTS will create Connection Hubs throughout the service area at key network convergence points and outer network areas where customers may transfer between multiple fixed route routes or connect to demand responsive service to reach their destinations. Specific types of shelters and amenities are provided at the Connection Hubs.

*5.2.B. Vehicle Assignment*

RTS buses are not assigned to specific communities within the RTS service area based on vehicle age or size but

### BOARD APPROVED POLICY

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rather to serve specific blocks of work that call for them based on the needs of that block. Blocks can be associated with different routes. RTS fixed routes transfer in the RTS Transit Center, which allows the use of the same bus and/or Bus Operator on more than one route (interlining). Interlining has the effect of randomizing which bus make/year will drive the fixed routes during service. Many of the routes and runs serve multiple communities with diverse populations. Buses are distributed widely across the fixed route service area rather than assigned to specific routes. Given RTS's strict maintenance standards, age does not serve as a viable proxy for diminished quality. RTS bus assignments encompass the activities and procedures carried out in the Scheduling Department, Maintenance Department, and Operations Department.

RTS electric battery buses differ from diesel buses because they have distance/range constraints that vary according to the outside temperature and the capacity of the onboard ESS (Energy Storage System). As electric buses are added to the fleet, Scheduling and Maintenance will identify blocks that are capable of supporting battery electric buses based on the number of miles and the anticipated temperatures during the period when a schedule will be in place ("pick"). The number of blocks identified for electric bus assignments will significantly exceed the number of available electric buses to ensure electric buses are deployed as broadly as possible within their range limitations.

1. **Scheduling Department:** After determining the service schedule, the Scheduling Department identifies desired bus categories for each block based on trip demands and the block's travel distance from the RTS property. This assignment happens in the Trapeze FX software and is limited to a simple statement of necessity; it does not include the actual assignment of a bus category, bus series, or bus number. A secondary Scheduling Department bus assignment process happens with the distribution of a Bus Assignment document via e-mail from the Maintenance Department. The Bus Assignment document is used to coordinate daily bus/block assignments.
2. **Maintenance Department:** Buses are grouped into the same bus categories used by the Scheduling Department. Buses are assigned to blocks throughout the day. Blocks that begin before approximately 1 PM (morning blocks) are assigned buses in the Maintenance Department by the Train Out group. Train Out utilizes the directives that come from the Scheduling Department to assign buses to blocks based on desired bus categories. When there are no buses in the block's desired bus category, available buses from other categories can be used based on priority. Additionally there is an "Auto-Assign" feature in Trapeze Ops that will automatically assign buses to blocks following the same set of rules as the manual assignment process.
3. **Operations Department:** After approximately 8 AM (afternoon blocks), Dispatchers assign buses in the Operations Department using the same process as the Train Out group. Occasionally, Dispatchers and Garage Supervisors may alter the bus type assignments due to lack of availability.

#### 5.2.C. RTS Fixed Route Service Types and Allocation

Services are allocated as outlined below, with the concentration of transit service happening within the Rochester City limits. All service will be monitored at a route level for ridership, on-time performance, cost recovery, pass-ups, and maximum load. If any route does not meet standards for the particular service type, the schedule will be adjusted to improve that measure, or the route may be reworked, or as a last resort, the route may be eliminated.

1. **Core Routes:** The Core route network operates between the RTS Transit Center and one or more peripheral end points located in the City or in adjacent suburban towns having urban density characteristics (greater than 3,600 persons per square mile). Core routes are characteristically full-service routes. They operate at high frequencies, generally provide all-day service, and operate on weekends. An urban route does not operate in express mode. There will be 22 Core routes. Short Line trips provide

### BOARD APPROVED POLICY

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increased frequency for part of a route with high ridership. Long Line Trips travel longer distances. There are four routes with this combination of Short Line and Long Line trips. Routes that either include a Short Line trip or have a structure that allows high frequency are in the Frequent Network. The Frequent Network has nine routes and one corridor. Routes in the Core tier also transport students to various schools in the urban core of Rochester, such as the Rochester City School district. These routes are referred to as Neighborhood District Service routes (NDS). NDS are regularly scheduled Core routes that are available to the public but are designed or modified to accommodate the needs of school students and personnel. Factors such as student enrollment can cause the number of schools and resulting number of NDS routes to fluctuate from year to year.

2. **Crosstown/Suburban:** Crosstown routes connect communities without traveling downtown. While these routes do not serve the RTS Transit Center, they do connect with routes that go to the RTS Transit Center. The redesigned system has three Crosstown routes: the Ridge Crosstown, the Culver/Goodman Crosstown, and the Lyell/Upper Falls Crosstown. Suburban routes are fixed routes that serve a specific suburban area but do not serve the RTS Transit Center. A suburban fixed route may have reduced frequency due to lower demand than an urban fixed route. The redesigned system has two Suburban routes (50 Fairport/Penfield and 70 Seabreeze Seasonal). The 70 Seabreeze Seasonal is categorized as Suburban because it does not travel downtown; however, the 70 Seabreeze Seasonal operates at the same frequency as the routes in the Core Local Network. The route is “seasonal” because it serves the Seabreeze Amusement Park, which operates seasonally from May to September.
3. **Commuter:** Commuter service means fixed route bus service, characterized by service that runs predominantly in one direction during peak periods, limited stops, and routes of extended length, usually between the central business district and outlying suburbs. The commuter service transports customers to Connection Hubs, where they can transfer to fixed route service. The redesigned system has eight Commuter routes serving Avon/Rush, Elmwood Avenue (Brighton), Brockport, Hilton/Hamlin, Newark/Lyons, Eastview Mall, Webster, and St. John Fisher College. These routes will provide service for customers commuting to and from work during the morning and evening commute times between these suburban areas and Downtown Rochester.
4. **Subsidized:** Subsidized service is paid for by business partners with RTS to fill a specific transportation need for that particular business or institution. Subsidized service is open to the public. The total number of subsidized routes may vary over time. Two subsidized routes are planned for the redesigned system.
5. **Experimental Routes:** Experimental routes are designated by RGRTA at the time of creation as being “experimental” if they are developed to test the viability of a new route structure. In no case will an “experimental” route remain experimental for more than 12 months.