



**Customer Service and Operations Committee**

**Board Information Item III-B**

**September 12, 2013**

**Title VI Required Service Standards, Policies and Definitions**

Washington Metropolitan Area Transit Authority  
**Board Action/Information Summary**

Action  Information

MEAD Number:  
200293

Resolution:  
 Yes  No

**TITLE:**

Title VI Required Service Standards

**PRESENTATION SUMMARY:**

WMATA's Service Standards, Policies, and Definitions developed and communicated as required by the Federal Transit Administration (FTA) Title VI Circular 2012 update.

**PURPOSE:**

To communicate to the Board of Directors WMATA's actions to meet the Service Standards, Policies, and Definitions requirements of Title VI, as published in the FTA Title VI Circular, October 2012 revision (FTA C 4702.1B).

**DESCRIPTION:**

FTA's Title VI Circular requires WMATA to monitor four service standards and two service policies for its fixed-route modes (Metrorail and Metrobus). The required service standards are Vehicle Load, Vehicle Headway, On Time Performance (OTP), and Service Availability. The two service policies required pertain to Distribution of Transit Amenities and Vehicle Assignment. FTA requires that these policies and standards can be monitored for disparate-impact and disproportionate-burden effects; the results of this monitoring are to be reported to the Board for its consideration, awareness, and approval of the monitoring results. To meet these requirements, WMATA staff has reviewed the requirements of the FTA Title VI Circular, WMATA's existing standards and policies, and existing monitoring tools to identify the service standards, policies, and monitoring efforts that will be used going forward.

**Key Highlights:**

- WMATA must take certain actions to meet updated FTA requirements for the September 2014 Title VI filing
- Cross-departmental working group formed; taking action to meet these requirements
- Changes include :
  - Adoption of mode-specific service standards and policies
  - Definition of what constitutes a disparate impact and disproportionate burden
  - Development of a monitoring plan, reporting of monitoring results to the Board
  - Development of an organization-wide Public Participation Plan

**Background and History:**

Title VI of the Civil Rights Act of 1964, as amended, as well as subsequent legislation and regulation, seeks to ensure that no person in the United States shall, on the ground 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. The FTA is the agency that provides oversight to WMATA's Title VI program.

WMATA has a depth of institutional experience with Title VI. In the history of WMATA's filings, the FTA has never rejected, or found substantial fault with our Title VI filings. The only requests from FTA have been for minor editing changes and clarifications. Other transit agencies have contacted WMATA for peer sharing based on a suggestion from FTA.

In October of 2012, the FTA released the most recent update to its Title VI Circular. This circular presents guidance and instructions for recipients of Federal financial assistance to comply with current U.S.

Department of Transportation (DOT) Title VI regulations. Changes made in this revision include the addition of several requirements, including the adoption of specific service standards and policies for providers of fixed-route public transportation services, and the policy definitions of what constitutes a major service change, disproportionate burden and disparate impact. Moreover, the updates require the monitoring of these service standards and policies for compliance with Title VI provisions, including disparate-impact and disproportionate-burden effects, and require Board consideration, awareness, and approval of the monitoring results.

It is important to note that prior Board and staff actions have already satisfied a significant portion of these updated requirements. Particularly, Board actions over the past several years that have adopted service standards for bus and rail, as well as established policies relating to transit amenities and transit vehicle assignment place the agency in a favorable position. (These Board and staff actions are listed in the footnotes of Tables I through IV).

Aside from these actions, further efforts have been underway to meet these enhanced requirements. For example, in June of 2013, WMATA staff released a memorandum to the Board, which presented a schedule of specific actions that WMATA would need to take in order to prepare for the upcoming 2014 Title VI filing. To ensure the success of these efforts, a Title VI working group, made up of senior management from several departments, has been formed to focus the overall execution of the Title VI effort. This informational briefing to present WMATA's current Service Standards and Policies, the definitions WMATA will use to monitor and comply with Title VI, as well as the planned and existing methods to monitor these standards and policies for compliance and reporting purposes, is one of several pending Board presentations that are sourced from this working group.

Going forward, WMATA's staff will work to continue its supportive partnership with the Board in the development of standards and policies in fulfillment of the Authority's Title VI obligations, as well as the execution of sound management practice.

**Discussion:**

Service Standards and Policies:

WMATA has established the service standards and policies for its fixed-route modes, as well as the planned monitoring for these standards and policies, as shown in the Tables I through IV, below:

FTA Standard [1]	WMATA Terminology	WMATA Definition	WMATA Calculation
Vehicle Load	Passengers-per-car (PPC)	Average number of passengers in a Metrorail car at maximum load stations	Normal (rush and non-rush) weekday minimum of <b>80</b> and maximum of <b>120</b> passengers-per-car, with an optimal occupancy being <b>100</b> passengers-per-car, averaged during a weekday hour at locations in the system where the vehicle passenger loads are the greatest. [2]
Vehicle Headway	Time between trains (frequency) <sup>2</sup>	Maximum scheduled time interval between trains during normal weekday service	Normal weekday rush period maximums shall be <b>3</b> minutes on core interlined segments, <b>12</b> minutes at Arlington Cemetery, and <b>6</b> minutes on all other segments; normal weekday midday maximums shall be <b>6</b> minutes on core interlined segments, and <b>12</b> minutes on all other segments; normal weekday evening maximums shall be <b>15</b> minutes on core interlined segments, and <b>20</b> minutes on all other segments. <sup>2</sup>
OTP	Headway	Percent adherence to scheduled weekday	During weekday rush service, number of station stops delivered within the scheduled headway plus 2 minutes, divided by total station stops delivered. During weekday non-rush, number of station stops delivered up to 150% of the

	adherence	headways	scheduled headway divided by total station stops delivered. Station stops are tracked system-wide, with the exception of terminal and turn-back stations. <sup>2</sup>
Service Availability	Population served by Metrorail	Percent of a population living near a Metrorail station	Population living within ½ mile of a rail station divided by the total population living in the compact zone.

TABLE II - Rail Service Policies	
FTA Policy [3]	WMATA Policy
Distribution of Transit Amenities	WMATA will equitably provide amenities such as seating, platform canopies, system maps, information signs, elevators, escalators, and waste receptacles at rail stations across the system.
Vehicle Assignment	Railcars are assigned to a line based on ridership demand, service schedules and maintenance infrastructure restrictions (e.g., capacity and technological limitations at yards and shops) [4].

TABLE III - Bus Service Standards			
FTA Standard [5]	WMATA Terminology	WMATA Definition	WMATA Calculation
Vehicle Load	Load Factor	Average ratio of passengers per seat per bus during a service hour at the maximum load point	Peak service maximum load factors of 1.2 on radial lines, 1.1 on crosstown and 1.0 on express lines and off-peak service maximum load factors of 1.0 on all service types, averaged during a weekday service hour (peak or non-peak respectively) by line where vehicle passenger loads are the greatest. <sup>6</sup>
Vehicle Headway	Time between buses (frequency)	Maximum scheduled time interval between buses	Weekday peak-period maximums shall be 15 minutes for Urban and Radial lines, and 30 minutes for Suburban lines; Off-peak and weekend maximums shall be 30 minutes for Urban and Radial lines, and 60 minutes for Suburban lines. [6]
OTP	Schedule adherence	Percent adherence to scheduled service.	For delivered trips, difference between scheduled time and actual time arriving at a time point based on a window of no more than 2 minutes early or 7 minutes late. [7]
Service Availability	Population served by Regional and Non-Regional Metrobus	Percent of a population living near a Metrobus stop	Population living within ¼ mile of a bus stop (regional and non-regional) divided by the total population living in the Compact zone.

<b>TABLE IV - Bus Service Policies</b>	
FTA Policy [8]	WMATA Policy
Distribution of Transit Amenities	WMATA will equitably provide amenities such as shelters, system maps, schedules, and waste receptacles at bus stops where WMATA has decision-making authority.
Vehicle Assignment	Vehicles are assigned to routes based on ridership demands, road conditions, service types, maintenance garage capacity and vehicle technologies (e.g., CNG fueling only provided at two garages) [9].

It is important to note that jurisdictional actions will be required as well. For example, there are 11,800 bus stops throughout the region, many with shelters. WMATA only owns 188 of those shelters. The rest must be accounted for in the Title VI submissions from each of the local jurisdictions.

Disparate Impact / Disproportionate Burden Definition and Monitoring:

FTA’s Title VI Circular requires WMATA to prepare and submit service and fare equity analysis for major service changes and all fare changes prior to implementing service and/or fare changes. The analyses are to determine whether the planned changes will have a disparate impact on the basis of race, color, or national origin, or if low-income populations will bear a disproportionate burden of the changes. Upon completion of a service or fare equity analysis, WMATA must brief the Board of Directors of the equity impacts of the service and/or fare change. As the foundation of this process, WMATA must identify what constitutes a “major service change” for its fixed route service as only “major service changes” are subject to a service equity analysis.

In addition, WMATA must develop policies for measuring disparate impact to minority populations and disproportionate burdens on low-income populations. These policies establish a threshold for determining when adverse effects of service changes or fare changes are disparate or disproportionate. In establishing these policies, WMATA must engage the public in the decision-making process to develop the disparate impact and disproportionate burden policy.

WMATA has established policies for major service change, disparate impact, and disproportionate burden, as shown in Tables V through VI, below:

Table V: Proposed Major Service Change for Metrobus

Parameters	Metrobus Definitions
Span	Change in span of service on a line of more than one hour in a single fiscal year.
Frequency	Change in revenue miles on a line of more than 20% in a single fiscal year.
Coverage/Availability	Change in Route miles on a line of 15% in a single fiscal year. Projected change of 10% of the riders on a line in a single fiscal year.

Table VI: Proposed Major Service Change for Metrorail

Parameters	Metrorail Definitions	Current Operations
Span	Change in span of normal operations above or below the current service levels	Normal rail service begins 5AM Monday-Friday; 7AM on weekends. Rail service ends 12AM Sunday-Thursday; 3AM Friday and Saturday.
Frequency	Change in frequency of normal operations above or below the current service levels	Normal weekday rush period maximums of 3 minutes on core interlined segments, 12 minutes at Arlington Cemetery, and 6 minutes on all other segments; normal weekday midday maximums of 6 minutes on core interlined segments, and 12 minutes on all other segments; normal weekday evening maximums of 15 minutes on core interlined segments, and 20 minutes on all other segments.
Coverage/Availability	Complete and permanent scheduled station closure for one or more days in a week; opening of a new station. Addition or abandonment of a line.	

WMATA's definition for Disparate Impact and Disproportionate Burden for Metrobus and Metrorail is under development. Because this policy impacts how the agency will make transit decisions in the future, it is very important for Metro to invest time to create a threshold definition. An interdepartmental working group was established to evaluate several approaches to create a policy definition that is supported by case law, has statistical validity, reflects peer transit agency approaches, considers the complexity of Metro services, is easy to understand and has input from the public who will be affected by it.

To assist in the development of the definition, WMATA will consult with a statistician with expertise in adverse impact analysis, and model options using previous service changes and fare increases. Moreover, as required by the updated FTA Circular, we are gathering input from the public on what an acceptable range would be in determining disparate impact. WMATA will analyze and incorporate the input from the public comment period (closing date August 30<sup>th</sup>). The threshold definition will be presented to the Board in October.

- [1] As defined in FTA C 4702.1B IV §4a
- [2] As defined in WMATA Board Resolutions 2012-29, and 2013-20
- [3] As defined in FTA C 4702.1B IV §4b
- [4] Per Metrorail Fleet Management Plan, Revision 4G
- [5] As defined in FTA C 4702.1B IV §4a
- [6] WMATA Board Resolution 2010-39
- [7] Definition from Vital Signs Report
- [8] As defined in FTA C 4702.1B IV §4b
- [9] Board Resolution 2010-39 Attachment A – 2010 Metrobus Fleet Management Plan

**FUNDING IMPACT:**

Project Manager:	Tawnya Moore-McGee
Project Department/Office:	Human Resources / Equal Opportunity and Employee Relations

**TIMELINE:**

<p><b>Previous Actions</b></p>	<p><u>03/2010</u> – WMATA Board Resolution 2010-15 (Transit Stop Guidelines), setting uniform guidelines for the design and placement of bus transit stops. These guidelines direct bus stop placement, spacing and type, elements, and amenities.</p> <p><u>07/2010</u> – WMATA Board Resolution 2010-39 (2010 Metrobus Fleet Management Plan), documents WMATA’s practices for operating and maintaining the Metrobus fleet and facilities, and documents WMATA’s planning process for projecting fleet and garage facility needs through FY 2025.</p> <p><u>08/2012</u> – WMATA publishes the latest revision to its Rail Fleet Management Plan (Rev. 4G), documenting processes and practices by which current and planned fleet size requirements, as well as operating spare ratios are set. Processes to match service goals to current and projected fleet requirements for service, and the effect of these requirements are affected by maintenance needs, system expansion, and other factors.</p> <p><u>10/2012</u> – FTA publishes Circular 4702.1B, outlining guidance and instructions for compliance with DOT Title VI regulations.</p> <p><u>10/2012</u> – WMATA Board Resolution 2012-29 (Rail Service Standards) establishing rail-system hours of service, rush-period train headway, and rush-period loading standards.</p> <p><u>07/2013</u> – WMATA Board Resolution 2013-20 (Non-rush Rail Service Standards) establishing rail-system non-rush weekday train headway and loading standards.</p>
<p><b>Anticipated actions after presentation</b></p>	<p>10/2013 – Action: Title VI Policy – Approval of Major Service Change, Disparate Impact and Disproportionate Burden Definitions</p> <p>10/2013 – Information: Public Participation Plan</p> <p>03/2014 – Action: Approval of Title VI Required Service Standards and Polices &amp; Monitoring</p> <p>05/2014 – Action: Title VI Required Public Participation Plan Approval</p> <p>06/2014 – Action: Approval of WMATA’s Title VI Program Update</p>

**RECOMMENDATION:**

While no action is requested of the Committee at this time, a Committee Action Item is scheduled for October seeking approval of the definitions for: Major Service Change, Disparate Impact and Disproportionate Burden.



# WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY

## Title VI Required Service Standards, Policies and Definitions

Customer Service and Operations Committee

September 12, 2013



# Purpose

- Overview of new Title VI requirements
- Review Board approved and staff developed service standards and policies
- Review draft definitions for:
  - Major service change
  - Disparate impact
  - Disproportionate burden
- Outline steps to meet FTA's September 2014 deadline





## Background

- Title VI of the *Civil Rights Act of 1964*, prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal funding
- In October 2012, FTA released Circular 4702.1B that outlined new requirements
- FTA requires Metro submit a Title VI program every 3 years
- Metro's Title VI history - all past Title VI plans have been approved



# New Title VI Requirements

- Service Standards

- Vehicle load
- Vehicle headway
- On-time performance
- Service availability

## Service Policies

- Distribution of amenities
- Vehicle assignment

- Service Monitoring Report
- Definition for Major Service Change, Disparate Impact and Disproportionate Burden
- Public participation plan





# Board Role

## Approve

- Definition for Major Service Change, Disparate Impact, Disproportionate Burden
- Monitoring Plan of Service Standards and Policies
- Public Participation Plan
- Title VI Program for submission to FTA





# Title VI Service Standards:

## 1 of 4 - Vehicle Loading

FTA Standard	WMATA Terminology	WMATA Definition	
Vehicle Loading on Rail =	Passengers-per-car (PPC)	Average number of passengers in a Metrorail car at maximum load stations	80 – 120 PPC
Vehicle Loading On Bus =	Load factor	Average ratio of passengers per seat per bus during a service hour at the maximum load point	1.2 on radial lines





# Title VI Service Standards:

## 2 of 4 - Vehicle Headway

FTA Standard	WMATA Terminology	WMATA Definition	
<b>Vehicle Headway On Rail</b>	Time between trains (frequency)	Maximum scheduled time interval between trains during normal weekday service	3 minutes during rush
<b>Vehicle Headway On Bus</b>	Time between buses (frequency)	Maximum scheduled time interval between buses	15 minutes for urban peak-period





# Title VI Service Standards:

## 3 of 4 - On-Time Performance

FTA Standard	WMATA Terminology	WMATA Definition	
<b>Rail OTP</b> =	Headway adherence	Percent adherence to scheduled weekday headways	Headway + 2 min
<b>Bus OTP</b> =	Schedule adherence	Percent adherence to scheduled service	Window: 2 minutes early or 7 minutes late

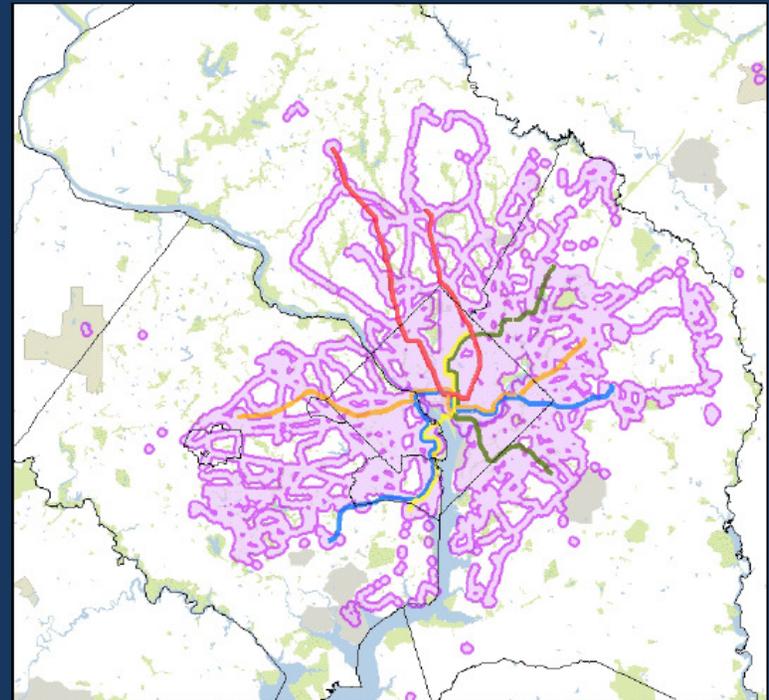




# Title VI Service Standards:

## 4 of 4 - Service Availability

FTA Standard	WMATA Terminology	WMATA Definition
Service Availability =	Population serviced by Metro	Rail – Percent of population living within 1/2 mile of a Metrorail station served
		Bus - Percent of population living within 1/4 mile of a Metrobus route served (Regional & Non-Regional Routes)



### Ex: Percent of Residents Within Walking Distance to..

	Low-Income	Non-Low-Income
Metrorail & Bus	71%	50%



# Title VI Service Policies: Amenities and Vehicles

FTA Standard	WMATA Translation
Distribution of Transit Amenities	WMATA will provide equitable distribution of amenities (e.g., shelters, system maps and waste receptacles) at rail stations and at bus stops where Metro has decision-making authority.
Vehicle Assignment	Vehicles are assigned based on ridership demand, system/road limitations and maintenance restrictions (e.g., CNG fueling only provided at two garages).





# Title VI Definition: Major Service Change - Metrobus

Amend Current Policies to Include Service Increases:

Parameters	Metrobus Definitions
Span	Change in span of service on a line of more than one hour in a single fiscal year.
Frequency	Change in revenue miles on a line of more than 20% in a single fiscal year.
Coverage / Availability	Change in route miles on a line of 15% in a single fiscal year.  Projected change of 10% of the riders on a line in a single fiscal year.



# Title VI Definition: Major Service Change – Metrorail

Parameters	Metrorail Definitions	Current Operations
<b>Span</b>	Change in span of normal operations above or below the current service levels	Start: 5AM Monday-Friday; 7AM on weekends. End: 12AM Sunday-Thursday; 3AM Friday and Saturday.
<b>Coverage / Availability</b>	Complete and permanent scheduled station closure for one or more days in a week; opening of a new station.  Addition or abandonment of a line.	



# Title VI Definition: Major Service Change – Metrorail

Parameters	Metrorail Definition		When	Core Interlined	All Others
Frequency	Change in frequency of normal operations above or below the current service levels		Weekday Rush *	3 Min.	6 Min.
			Weekday Midday	6 Min.	12 Min.
			Weekday Evening	15 Min.	20 Min.

\*12 minutes at Arlington Cemetery on Weekday Rush



# Ensuring Equity

## Policies for Disparate Impact and Disproportionate Burden

- Assess adverse impact of a major service change or fare change on protected populations
- Establish threshold to define when adverse effects borne
- Determine if change has a:
  - Disparate impact (minority population)
  - Disproportionate burden (low income population)
- Public engagement process for setting these policies





## Metro's Objectives and Approach to Defining DI/DB Policy

- Legally defensible
- Statistical validity
- Considers public comment
- Reflects equity
- Considers the complexity of Metro's system
- Considers peer transit agencies' approaches
- Easy to execute and understand



## Next Steps: Proposed DI/DB Threshold

- Consult Statistician with expertise in adverse impact analysis
- Model options using previous service changes and fare increases
- Consider public comment
- Finalize policy definition
- Present proposed disparate impact/disproportionate burden policy to the Board in October



# Public Outreach Approach

- Internal Outreach
  - JCC: 6/28/13 and 8/23/13
  - AAC: 7/1/13
  - RAC: 7/10/13
  - Title VI Advisory Group: 8/5/13
- External Outreach
  - CBO Focus Groups (weeks of 8/12 and 8/19)
  - Online Comment Survey (wmata.com) (Starting 8/14)
  - Press Release (8/14)
  - Listserv Notification (Starting 8/14)
  - Posting on PlanItMetro



# Next Steps

## October 2013:

- **Action:** Title VI Policy – Approval of Major Service Change, Disparate Impact and Disproportionate Burden
- **Board memo:** Public Participation Plan

## March 2014:

- **Action:** Approval of Title VI Required Monitoring of Service Standards and Polices

## May 2014:

- **Action:** Title VI Required Public Participation Plan Approval

## June 2014:

- **Action:** Approval of WMATA's Title VI Program Update

## Sept 2014:

- Title-VI Plan due to the FTA