



# TARC Title VI Policy Amendment



## What is a Service Equity Analysis?

When large transit agencies make major changes to their services, they are required by federal rules to do a specific type of analysis. This is called a “Service Equity Analysis” (SEA).

## When is it required?

A Service Equity Analysis (SEA) is required whenever an agency makes a “major” service change. Each agency defines for itself what types of service changes are “major.”

TARC has defined a major service change as any change to a route that causes the number of vehicle hours on the route (the working hours of all the buses that drive the route) to go up or down by more than 25%.

## How can “equity” be measured?

The federal rules that require an SEA don’t prescribe any particular method for measuring, they only give guidelines.

Whichever method TARC uses for a service change, the agency is always looking to keep negative impacts on people of color and low-income people low. Just how low isn’t set by the federal government, it is up to each agency. At TARC, the policy is that, if there is a negative impact on people of color or low-income people (which there often is not), that impact needs to be no more than 10 percentage points worse than the impact on white and higher-income people.

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## What is proposed to change now?

In Spring 2025 TARC is proposing three small amendments to its equity policies:

1. Clarifying that a major service change happens when 25% of vehicle hours or vehicle miles change on a route per typical week. This is a standard definition at other agencies and ensures that the intended types of service changes are all captured.
2. Clarifying that it isn't 10% but 10 percentage points of difference that is allowed between impacts on protected populations and non-protected populations. This is to clarify and prevent a mathematical misapplication of the number.
3. Allowing TARC to analyze changes to multiple connected routes as one multi-route change, with all of the cumulative impacts. This makes it possible to analyze equity for a complete network redesign – a possibility that wasn't thought of when the existing TARC policy was written many years ago.

None of these would affect the core of the existing TARC policy, in terms of when an SEA must be done and how “equitable” is defined.



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Title VI ~~Major Service~~ ~~Change and Impact~~ Equity Policies

## Major Service Change Policy

A “~~m~~Major” service changes are those that change revenue service more than 25% on a route, measured in terms of revenue hours or revenue miles per typical weekly schedule. In these cases, a service equity analysis will be performed and the results will be delivered to the TARC Board of Directors. The change requires approval by the Board of Directors.

TARC adopts the following for disparate impacts and disproportionate burden policies for major service and fare changes. TARC's ultimate goal is to avoid, eliminate, or minimize any disparate impacts or disproportionate burdens on Title VI populations.

Any potential adverse effects of service or fare changes on minority or low-income passengers will be mitigated with proposed alternative measures.

## Disparate Impact Policy

The TARC Disparate Impact Policy states disparate impact to be +/- 10% (percentage points) statistical difference between the effects on minority populations compared to the impacts borne by non-minority populations.

## Disproportionate Burden Policy

The TARC Disproportionate Burden Policy states disproportionate burden to be +/- 10% (percentage points) statistical difference between the effects on low-income populations compared to the impacts borne by non-low-income populations.

Each of these policies will be applied to system-wide demographics to individual routes ~~and~~ or routes cumulatively.

**Commented [MP1]:** Amending the title to a more general title that encompasses all three of the policies included below.

**Commented [MP2]:** Grammar correction (making this a plural noun to agree with the rest of the sentence).

**Commented [MP3]:** While “revenue service” earlier in the sentence implies that either revenue hours or revenue miles will be used, someone reading quickly could think that some other measure (such as linear route miles) might be used. Revenue hours and revenue miles are standard among peers as the units of measurement of change to a route.

**Commented [MP4]:** Giving this paragraph a heading, to be consistent with the next paragraph which has a heading.

**Commented [MP5]:** This could be read to mean either percentage or percentage points. Other agencies limit the percentage points of difference.

**Commented [MP6]:** As above.

**Commented [MP7]:** In a network redesign, it is often not possible to link an “old” route to an individual “new” route. Segments from an “old” route are often served by multiple “new” routes, so a “new” route may be a combination of multiple “old” routes. Measuring impacts on routes individually implies only comparing old-to-new for every individual route, which is not possible in a network redesign. Therefore when agencies prepare to for an equity analysis of a redesign, they must amend their policies like this, to allow for the cumulative analysis of groups of routes or the entire network. When TARC’s policy was first written, in 2013, network redesigns were rare and the policy therefore didn’t allow for this possibility.

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## Title VI Service Equity Policies

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