

Equity Analysis Policies

FTA requires transit providers to conduct Title VI equity analyses whenever they plan a fare change and/or a major service change. The major purpose of conducting service and fare equity analyses prior to implementing service and/or fare changes is to determine whether the planned changes will have a disparate impact on the basis of race or income. By conducting equity analyses, TANK intends to ensure that the impacts of service and fare changes are distributed equitably to minority and low-income populations and are not discriminatory. The following policies define the thresholds that TANK applies for determination.

1. Major Service Change Policy

Under the FTA Title VI guidelines, transit providers are required to define their own thresholds to determine when a change in service qualifies as a major service change.

Typically, TANK implements several minor service changes, every 3 or 4 months. These bonded changes are named here "Service Change Package". TANK determination of Major Service Change applies when the proposed service change package meets one or more of the following criteria. Such a package triggers a Service Equity Analysis, which will be reviewed and approved by TANK Board of Directors.

- A. The service change package would impact 25 percent or more of the transit revenue hours allocated to any county within the TANK service area. If change in any one of the counties meet or exceed the 25 percent threshold, then the service change will be considered major within the corresponding county.
- B. The proposed service change package includes implementation of a new route that would serve a city or a regional travel pattern that is not included in the current service.
- C. The service change package includes an elimination of a route segment, where no alternative service is provided within one mile walking distance from one or more bus stops on the segment to be eliminated.

In accordance with the FTA guidance, any permanent fare change requires equity analysis. Temporary service changes lasting less than twelve (12) months and temporary fare changes lasting less than six (6) months shall be exempt from the major service change policy. For more details, see FTA Circular 4702. 1B. Chap. IV 10-21.

2. Disparate Impact and Disproportionate Burden Policy

Under the FTA Title VI guidelines, transit providers are required to establish their own thresholds to determine when disparate impacts and disproportionate burdens exist as a result of a major service change or fare change.

"Disparate impact" refers to a facially neutral policy or practices that disproportionately impacts members of a group identified by race, color, or national origin.

“Disproportionate burden” refers to a neutral policy or practice that disproportionately impacts low-income populations compared to non-low-income populations.

TANK’s measurement of disparate impact and disproportionate burden contemplates the population of the TANK service areas as the comparison groups. It involves a comparison between the proportion of the protected class population in the area to be affected, and the proportion of the protected class population in the TANK service area. Essentially, if the affected area has significantly more minority and low-income population as compared to the TANK service area, then the service/fare change may constitute disparate impact and/or pose disproportionate burden.

TANK will make the determination of disparate impact and disproportionate burden by comparing between the proportion of the protected populations in the affected area (A) and the equivalent proportion in the TANK service area (B). If A is more than 20% different when compared to B, then the change may pose disparate impact or disproportional burden. For instance, if the segments affected by a service change serve an area that is 40 percent minority in average, and the TANK service area population is 18 percent minority in average, then changes may have a disparate impact on minority population.

The determination procedure would be applied to all major service changes and permanent fare changes. It is described in-details in the TANK 2014 Title VI Plan. For more details about the requirements, see FTA Circular 4702. 1B. Chap. IV 10-12.

A copy of the 2014 TANK Title VI Compliance Program is available for inspection during normal business hours, 8:30 a.m. to 5:00 p.m., at the administrative office of the Transit Authority of Northern Kentucky (see address below).

Any comments related to this goal can be submitted in writing to the Manager of Planning at the address listed below:

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