

Public Comments on the Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy

The following comments were logged on the proposed Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy via email.

Comment 1

Received 8/16/18 via Doug Slaughter, PVTA Board member (emailed)

After attending the recent PVTA information sessions in Springfield, Northampton and Amherst, I have become seriously concerned about the proposed changes to the PVTA Disproportionate Burden Policy (DBP) (see http://www.pvta.com/media/pdfs/DraftServiceChange_DI_DB%20policies.pdf).

I believe that the proposed change in the way that undergraduate students are assessed for “low income” status could have major negative consequences for Amherst and other communities in the Five College area. Furthermore, I feel that the process for public notification, explanation and request for comment associated with the Title VI review that is prompting the DBP modification has been insufficient for such a significant change.

The essence of the proposed new policy is that, going forward, the low-income classification of undergraduate students will no longer be solely determined by their reported income, but, in addition, by their Pell Grant eligibility and their FAFSA status as independents. No modeling data has been provided, but with Pell Grant eligibility in the Five College area generally at 25% or less, the number of Amherst’s Disproportionate Burden routes is likely to decrease drastically. The result will be that many of the PVTA bus routes through Amherst will likely suffer much larger cuts and during system-wide service reductions than when using the past DBP formula.

Here’s a list of my questions and concerns, largely based on information I received from Price Armstrong, PVTA Senior Transit Operations Analyst, who presented at the Amherst session.

1. The new policy is described as “In accordance with FTA Circular 4702.1B, and industry standards and best practices.” FTA Circular 4702.1B makes no mention of Pell Grant eligibility in assessing low income students, and the source of the supporting industry standards and best practices has not been identified.
2. Proposal of such a significant change should be accompanied by quantitative estimates of how the DBP change will affect PVTA communities. Just how much will Amherst be hurt?
3. Approximately 10% of undergraduates enrolled at the Five Colleges are international students who are not eligible for Pell Grants.
4. The four information sessions for public “comment and consideration” that describe the DBP policy change have been scheduled during mid-August when the Five Colleges are not in full session and many students – those who will be most affected -- are away.

5. Publicity for and attendance at the information sessions reviewing such an important change have been disappointing. I understand that the main method of notification was via signs posted on the PVTA busses, and there were multiple comments from the audience that better publicity needs to be done.
6. Awareness of the impending change among municipal and Five College leaders appears largely lacking. Mr. Slaughter was the only community policymaker that I observed attending any of the information sessions in Springfield, Northampton and Amherst.
7. Finalizing of the new DBP policy by PVTA is scheduled for September 12, so there is a real urgency to raise objections.

I hope that this information is helpful and that you might make others in Amherst and the Five College area aware of the potential impacts. And, if you are concerned that the new DBP policy threatens future PVTA service levels in Amherst, I hope you will push back on the change before it is too late.