

# 2020 Update to the Metropolitan Council Title VI Program

Transportation Committee

January 13, 2020

Guthrie Byard, ADA & Title VI Administrator, OEO

Cyndi Harper, Manager, Route Planning, Metro Transit



# Objectives

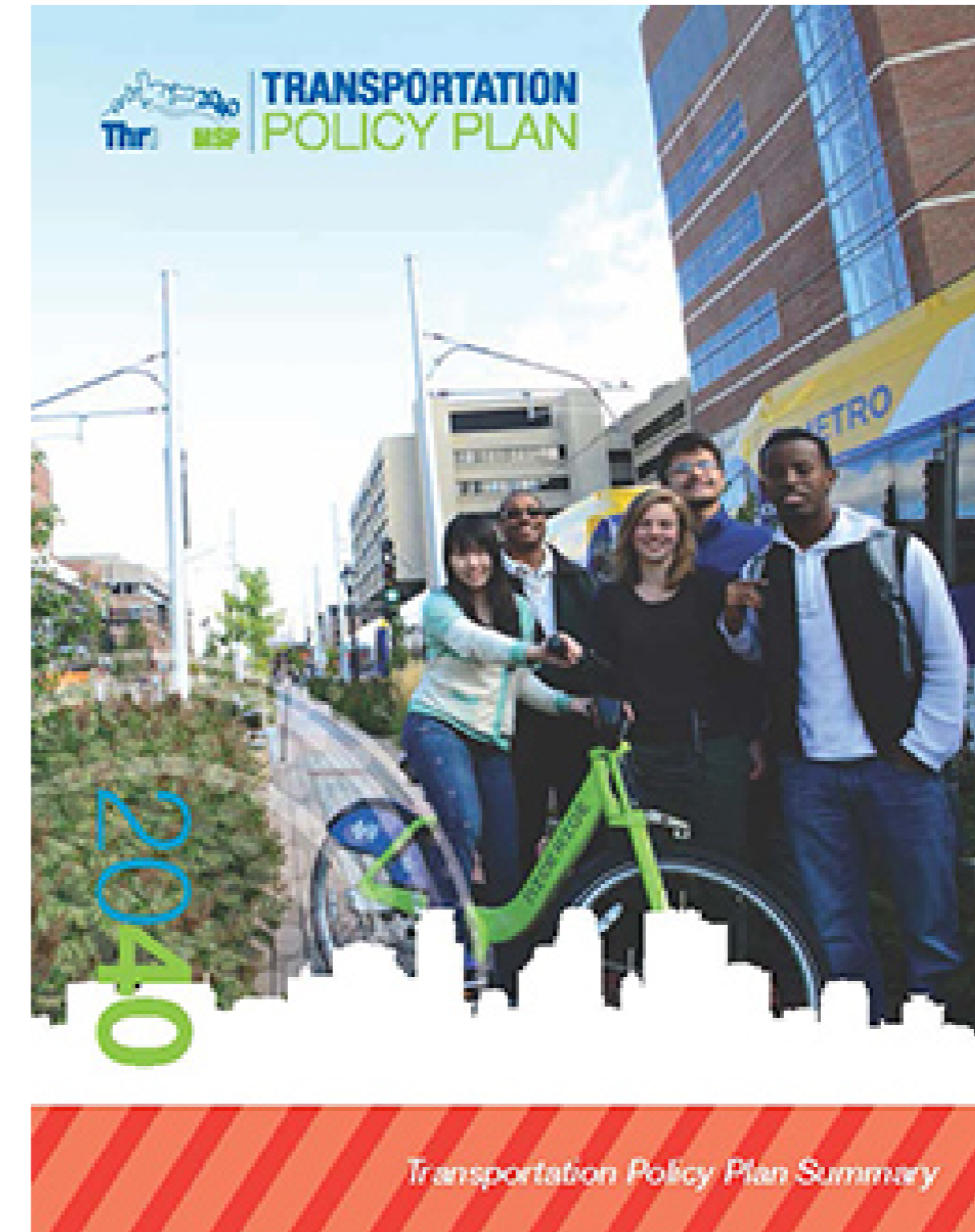
- Provide an overview of Title VI
- Explain what a Title VI Program update means
- Share what's included in a Title VI Program
- Detail requirements for fixed-route providers
- Request program update approval

# What is Title VI?

- Part of the Civil Rights Act of 1964 - applies to race, color and national origin
- Prohibits discrimination by recipients of federal funding
- 1994 Executive Order extends protections to low-income populations
- FTA Circular 4702.1b outlines requirements
- Applies to Metropolitan Council and our subrecipients

# What is the Title VI Program Update?

- A reporting tool summarizing existing Council policies and operational practices
  - Compilation of our Title VI work between mid-2016 and mid-2019
  - This work was informed by projects and plans that were the subject of extensive public engagement
- The FTA required part of the Council equity plan
- Must be updated every three years, approved by Council





# Requirements for Fixed Route Providers

- Outline systemwide standards and policies that will be used in the Service Monitoring Study
  - Vehicle load, service frequency, service availability, on-time performance, distribution of amenities and vehicle assignment standards
  - Standards used from the Transportation Policy Plan
- Collect and report demographic data
  - Sources: US Census, American Community Survey (more current data), Travel Behavior Inventory, Metro Transit Customer Survey (2018)
  - Metro Transit Service Area is 30.5% minority, 11.8% low-income

# Additional Requirements for Fixed Route Providers

- Providers with more than 50 vehicles in peak service must do an equity analysis for all proposed fare changes, major service changes and new support facilities to determine if there is potential for disparate impact or disproportionate burden

# Major Service Change Procedure

- For an existing route(s), one or more service changes resulting in at least a 25% increase or decrease in the daily in-service hours within a 12-month period (3,500 annual in-service hours minimum)
- Restructuring of transit service throughout a sector or sub-area of the region as defined by Metro Transit
- Elimination of a transit route without alternate fixed route replacement



# Additional Requirements for Fixed Route Providers

- Providers with more than 50 vehicles in peak service must do an equity analysis for all proposed fare changes, major service changes and new support facilities to determine if there is potential for disparate impact or disproportionate burden

# Disparate Impact and Disproportionate Burden

- Policy or practice that disproportionately impacts members of a group more than the overall population.
- The term “disparate impact” is used for race, color, national origin; “disproportionate burden” is used for low-income communities



# What is that Threshold?

The Council has adopted the “four-fifths rule”:

## Disproportionate Burden

- Benefits are being provided to minority or low-income populations at a rate less than 80 percent (four-fifths) the benefits being provided to non-minority or non-low-income populations.

## Disparate Impact

- Adverse effects are being borne by non-minority or non-low-income populations at a rate less than 80 percent (four-fifths) the adverse effects being borne by minority or low-income populations.

# Four-Fifths Example

A bus route restructuring project results in an increase in the overall amount of service available. We have determined the average increase in service levels for an area. Is there a disparate impact in where service improvements are being made?

	Avg. % increase in service levels	Four-Fifths Threshold
Low-Income Population	6.8%	5.7% (7.1% x .8) = No
Non-Low-Income Population	7.1%	
Minority Population	8.1%	8.8% (11% x .8) = Yes
Non-Minority Population	11%	

# Equity Analyses Included in Program Update

- Three service equity analyses
  - West End Transit Study restructuring
  - Route 614 elimination
  - C Line/Route 19 changes
- One fare equity analysis (2017 fare increase)
- One support facility siting analysis (new Minneapolis bus garage)
- No disparate impact or disproportionate burden was found as a result of these analyses

# Proposed Action

- Approve the Metropolitan Council 2020 Title VI program update
- Adopt resolution No. 2020-02 adopting the Title VI Program Update and signing the Title VI Policy Statement and Assurances as required by USDOT

