



# 2023-2025 Title VI Program Update

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ADA & Title VI Administrator

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Transportation Committee



# Agenda

- Title VI overview
- Updates to the 2023-2025 Title VI Program

# What is Title VI?

## **Title VI – 1964 Civil Rights Act**

- 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?

- A reporting tool summarizing existing Council policies and operational practices
  - Compilation of our Title VI for the last three years (July 2019-June 2022)
  - 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

# Title VI Program Sections

**3 sections including tables, figures and attachments**

1. General Requirements
2. Fixed Route Provider Requirements
3. MPO Requirements

# General Requirements

- Notify customers of their rights
- Documented complaint process
- Use inclusive public participation processes, specifically for those whose first language is not English

## YOUR RIGHTS UNDER TITLE VI

The Metropolitan Council operates its services and programs without regard to race, color or national origin. Contact us to file a discrimination complaint, or to learn more about Title VI obligations.

El Metropolitan Council opera sus servicios y programas sin distinción de raza, color u origen nacional. Comuníquese con nosotros para presentar una queja por discriminación o para obtener más información sobre las obligaciones de Title VI.

Metropolitan Council (Hội Đồng Thành Phố) điều hành các dịch vụ và chương trình của mình mà không phân biệt đối xử dựa trên chủng tộc, màu da hay nguồn gốc quốc gia. Hãy liên lạc với chúng tôi để nộp khiếu nại về hành vi phân biệt đối xử hoặc để tìm hiểu thêm về các quy định của Tiêu Mục VI.

Metropolitian Council waxay adeegyadeeda iyo barnaamijyadeeda ku fulisaa iyadoo aan la eegayn jinsi, midab iyo asal qaran. Nala soo xariir si aad u xarayso cabashada la xariirta faquuqa, ama si aad wax badan uga ogaato waxyaabo ku saabsan waajibaadyada Title VI.

၀. မြို့ပြကံ ငှက်အားကရ ၂ ကရိုအိုငို ဘာတစ် ဘာမ ၂ ဘာရဲ ငှက်ကျဲ ၂ လ ၂ အဘဏ်ထံ ၊ ဘာလဲ၏ ယ ငှ သ ၊ ငှ အဲ ဆဲ ဆဲ ကာလ၂အလ ၊ ငှ ဘာလဲအလ ၂ အဲ ဆဲ ကျ ၂ ဆဲ ကျ ၂ ယ ၂ နမ ၂ အဲ ငှ အာ ၊ ဘာ ငှ အာ ငှ အာ ယ ဘာဆဲ ငှ အာကဲအာကဲလ ၂ အာမ ၂ အာမ ၂ ယ ၂ အာမ ၂ အာမ ၂ ငှ ၊ အ ၂ လီမ ၂ နမ ၂ ဘာကဲအာကဲ- နမ ၂ န ၂ လီမ ၂ အာ ယ အာလ ၂ အာလ ၂ အာမ ၂ အာမ ၂ ယ ၂ အာမ ၂ အာမ ၂ ယ ၂ .

Lub koom haum Metropolitan Council yuav khiav lawv cov kev pab cuam thiab kev pab yam tsis xam txog leej twg haiv neeg, thiab teb chaws yug. Hu cuag peb kom ua ntaub ntawv tsis txaus siab, los sis yog xav paub ntxiv txog cov tes dej num ntawm txoj cai Title VI.

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# Additional General Requirements

## Public Engagement Efforts and Language Assistance Plan

- Detailed list of transit public engagement efforts
- Inclusion of broader Council practices
  - Public Engagement Plan
  - Transportation Policy Plan
  - Regional Solicitation
  - TIP
- Language assistance plan detailing translation and interpreter efforts
  - Four-factor analysis done to determine which languages to translate
  - "Vital documents" determines what to translate

# Fixed Route Provider Requirements

## **Set systemwide standards and policies**

- Vehicle load, service frequency, service availability, on-time performance, distribution of amenities, vehicle assignment
- Standards found in TPP, Council policy and procedures, department best practices
- Used in Service Monitoring Study (updated 2021)

## **Report demographic data**

- Service data profile maps and charts
- Survey data re: customer demographic and travel patterns



# Additional Fixed Route Provider Requirements

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.

# Evaluating Service and Fare Changes

A service or fare equity analyses determines whether a service or fare change could result in a disparate impact or disproportionate burden to low-income or BIPOC communities.

Transit agencies must establish two policies:

- Major service change
- Disparate impact/disproportionate burden threshold

# Major Service Change Policy

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

# Disparate Impact and Disproportionate Burden Policy

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

# What is the Current DIDB Threshold?

**80%**

## **Disproportionate Burden**

- Benefits are being provided to low-income populations at a rate less than 80% than the benefits being provided to non-low-income populations.

## **Disparate Impact**

- Adverse effects are being borne by those who are white at a rate less than 80% the adverse effects being borne by those who are BIPOC .

# MPO Requirements

## Demographics and Fund Distribution Information

1. Planning area demographics
2. TVI principles as applied to regional planning
3. Distribution of state and federal funds, related analyses
4. Subrecipient engagement in funding process

# Updates to the 2023-2025 Title VI Program

- Updated DIDB Policy and community engagement
- Updated (2021) Service Standards and Policies Monitoring Evaluation
- Service equity analyses (no DIDB found):
  - Orange Line
  - D Line
  - Routes 63 and 323
- Adjusted poverty threshold to 185% to be consistent across Council
- More inclusive language – BIPOC instead of minority

# Action Requested

- That the Metropolitan Council shall approve the 2023-2025 Title VI Program.