Embracing Your Title VI Program

Updating and Implementing your Title VI Program for Transit Providers
What Are We Talking About Today?

- Title VI Purposes and Authorization
- Updating Your Title VI Program
- Title VI Triggers
- Implementation Guidance
- Q&A

Carrots and Sticks of your Title VI Program!
Title VI Authorization and Purposes

CIRCULAR

U.S. Department of Transportation
Federal Transit Administration

FTA C 4702.1B

October 1, 2012

Subject: TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS

1. PURPOSE. The purpose of this Circular is to provide recipients of Federal Transit Administration (FTA) financial assistance with guidance and instructions necessary to carry out U.S. Department of Transportation ("DOT" or "the Department") Title VI regulations (49 CFR part 21) and to integrate into their programs and activities considerations expressed in the Department’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient ("LEP") Persons (70 FR 74087, December 14, 2005).

2. CANCELLATION. This Circular supersedes FTA Circular 4702.1A “Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients,” dated May 13, 2007.

3. AUTHORITY

Title VI vs. Environmental Justice

Title VI of the Civil Rights Act of 1964 - FTA C. 4702.1B

- Prohibits discrimination on the basis of race, color or national origin
- Broad in scope:
  - All activities
  - Requires remediation

Environmental Justice Executive Order - EO 12898

- Mission focused
- Identifying and addressing disproportionately high and adverse health and environmental impacts of policies, programs and activities on low-income and minority populations

- Narrow in Scope
  - Is Executive Branch policy
  - Not enforceable in courts
  - Does not create any rights or remediations
Title VI Protections
FTA Circular 4702.1B

DISPARATE IMPACT:
“facially neutral policy” or practice that disproportionately affects members of a group identified by race, color, or national origin.

DISPORPORTIONATE BURDEN:
A neutral policy or practice that disproportionately affects low-income/minority populations more than other populations.

Are we unfairly distributing transit resources throughout the community?
Are we unfairly burdening a minority/low-income community over others?
TITLE VI FOCUS:
- Service Area
- LEP Population
- Minority Population

ORGANIZATIONAL ISSUES
- Title VI Administrator
  - Title VI Notice
  - Complaint Form
  - Complaint Procedures
  - Complaint Record
Non-Elected Committee Composition

PUBLIC PARTICIPATION PLAN
1. Demographic Analysis
2. Project type
3. Proactive Participation Strategies

LANGUAGE ASSISTANCE PLAN
1. Four Factor Analysis
2. Implementation Plan
3. Monitoring & Evaluation, Updating LAP
4. Staff Training

DEVELOP SYSTEM-WIDE SERVICE STANDARDS & POLICIES

SUB-RECIPIENT ASSISTANCE & MONITORING

SITE EQUITY ANALYSIS

BOARD/COUNCIL RESOLUTION

COMPLETED PLAN
Title VI Program Components

**TITLE VI FOCUS:**
- Service Area
- LEP Population
- Minority Population

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**Title VI Focus:**
- Service Area
- LEP Population
- Minority Population

**Organizational Issues**
- Title VI Administrator
- Title VI Notice
- Complaint Form
- Complaint Procedures
- Complaint Record
- Non-Elected Committee Composition

**Public Participation Plan**
1. Demographic Analysis
2. Project type
3. Proactive Participation Strategies

**Language Assistance Plan**
1. Four Factor Analysis
2. Implementation Plan
3. Monitoring & Evaluation, Updating LAP
4. Staff Training

**Board/Council Resolution**

**Completed Plan**

**Develop System-Wide Service Standards & Policies**

**Sub-Recipient Assistance & Monitoring**

**Site Equity Analysis**
**Title VI Program Components**

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- Title VI Administrator
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**SITE EQUITY ANALYSIS**

**BOARD/COUNCIL RESOLUTION**

**COMPLETED PLAN**
Title VI Resources

RESOURCES
www.calact.org/titlevi

- Sample Plans
- Title VI Program Template
- Language Assistance Plan development tool
- PowerPoints from past trainings, etc.

Reminder:
Requirements differ for fixed route providers with 50 or more vehicles & located in large UZA.
Updating Your Title VI Program
Updating Your Title VI Program
Approach

Guiding Questions
1. Who interacts with public?
2. Is Program being used?

Responses
1. Consult staff (that interacts with public)
   - What is/isn’t working
   - Has interaction with LEPs changed?
2. Change Program format/organization
   - PPP and LAP attached as separate documents
   - Quick Reference Sheet (handout) as first page
Updating Your Title VI Program

Handout: UPDATE APPROACH

- What needs to be updated
  1. Contact information, Notice locations, websites
  2. Demographics, especially LEP populations
  3. Public Participation Plan/Language Assistance Plan
  4. Service Standards & Policies
DISCUSSION/QUESTIONS:

• Comments about Update experiences?
• What have you CHANGED in your program?

Use Update Approach Handout to organize your agency’s update
Title VI Triggers

1. Arabic
2. Armenian
3. Bengali
4. Cambodian
5. Chamorro
6. Simplified Chinese
7. Traditional Chinese
Title VI Triggers
Specific Events with Title VI Implications

Handout: Title VI QUICK REFERENCE SHEET

A. Public Outreach

B. Determining new transit facility site
   ➢ Equity analysis required

C. Fare or Fare Media Change
   ➢ Equity analysis required
      • If more than 50 vehicles/over 200,000 population

D. Major Service Change
   ➢ Equity analysis required
      • If more than 50 vehicles/over 200,000 population

E. Agency/Population Growth
   ➢ Additional data, reporting, and monitoring required
Title VI Triggers
Specific Events with Title VI Implications

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Title VI Triggers

PUBLIC OUTREACH

A.
Public Outreach

Questions to Ask

• Staff trained
• Compliance with PPP
• Providing language assistance
• Proactive outreach strategies

Ways to Integrate Title VI

Studies and Plans
• Short Range Transit Plan
• Major service changes
• Fare changes
• Coordinated Plan Update
• Special grant outreach

Operations
• Bilingual call takers
• Venues, times, format
• Mobility manager’s outreach
• Ride Guide in Spanish
DISCUSSION/QUESTIONS:

• Integrating public participation and Title VI: Recent successful events or formats?
• Any creative strategies for reaching LEP individuals?
Title VI Triggers

DETERMINING NEW TRANSIT FACILITY SITE
Who: ALL fixed route transit providers

When:

1. Determining site of a transit-related facility (storage or maintenance facilities, operations centers)
2. During the PLANNING process

Purpose: Ensure location is selected without regard to race, color, or national origin.

FTA C 4702.1B, Chapter III-11-12
Requirements

1. Engage in outreach to persons potentially impacted
2. Compare equity impacts of sites
   – consider MULTIPLE ALTERNATIVES
3. Determine if cumulative adverse impacts might result due to similar facilities in area
4. Analysis at Census tract or block group
5. Occur BEFORE selection of preferred site

FTA C 4702.1B, Chapter III-11-12
Title VI Equity Analysis
Determining Site or Location

• What you’re looking for:

  DISPARATE IMPACT:
  Facially neutral policy or practice that disproportionately affects members
  of a group identified by race, color, or national origin

• If disparate impact exists:

  1. Analyze alternatives to determine which has less disparate impacts.
  2. Implement least discriminatory alternative.
Title VI Equity Analysis

Sample Approach

- Skagit Transit, Skagit County, WA
- Maintenance, Operations and Administration Base

[www.skagittransit.org/assets/1/7/Title_VI_Equity_Analysis_for_MOA_Siting.pdf]
B. Title VI Equity Analysis
Sample Approach

1. Public Comments on site alternatives (3)
2. Benefits and Burdens Analysis of Alternatives
3. Description of original site ranking process based on facially neutral criteria
4. Alternatives Equity Analysis
5. Cumulative Impacts
6. Conclusion (Interpreting Analyses)
B. Title VI Equity Analysis
Sample Approach

1. Benefits and Burdens Analysis of each alternative

2. Equity Analysis of Alternatives

3. Cumulative Impacts Analysis
Census analysis at Block Group Level of minority, LEP, Poverty populations

Map of Site Alternatives

1. FedEx & Higgins Airport Way - Site Airport
   US Census Tract 951900, Block Group 2

2. South Mount Vernon Site
   Census Tract 952600, Block Group 3
<table>
<thead>
<tr>
<th>1. Port of Skagit Properties</th>
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<tbody>
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<td><strong>Potential Positive Community Impacts (Benefits)</strong></td>
<td><strong>Potential Adverse Community Impacts (Burdens)</strong></td>
</tr>
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<td>1. Absence of residential properties means unlikely that adverse impacts of noise, light and traffic will have adverse impacts.</td>
<td>2. Difficult for public to access due to weak transit service to area and longer travel times.</td>
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<td>2. Comparable, if not increased, public access to the facility based on distance from population centers and transit availability.</td>
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*Additional detail on mitigations?*

**Enhance Analysis:**
- Add data
- Current transit levels
- Distances
- Future transit levels
- Some quantitative indicators (service, distances)
- Zoning differences
Census analysis at Block Group Level of minority, LEP, Poverty populations

<table>
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<tr>
<th>Sites 1 &amp; 2</th>
<th>FedEx and Higgins Airport Way Site Census Block Group</th>
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<tbody>
<tr>
<td>Total Population</td>
<td>2,644</td>
</tr>
<tr>
<td>White</td>
<td>2,445</td>
</tr>
<tr>
<td>Minority</td>
<td>199</td>
</tr>
<tr>
<td>Percent Minority</td>
<td>7.53%</td>
</tr>
<tr>
<td>Total in Poverty</td>
<td>178</td>
</tr>
<tr>
<td>Percent in Poverty</td>
<td>6.73%</td>
</tr>
<tr>
<td>Median Income</td>
<td>$82,222</td>
</tr>
<tr>
<td>LEP (Spanish)</td>
<td>2.1%</td>
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<th>Site 3</th>
<th>South Mount Vernon Site Census Block Group</th>
</tr>
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<tbody>
<tr>
<td>Total Population</td>
<td>726</td>
</tr>
<tr>
<td>White</td>
<td>561</td>
</tr>
<tr>
<td>Minority</td>
<td>165</td>
</tr>
<tr>
<td>Percent Minority</td>
<td>22.73%</td>
</tr>
<tr>
<td>Total in Poverty</td>
<td>10</td>
</tr>
<tr>
<td>Percent in Poverty</td>
<td>1.38%</td>
</tr>
<tr>
<td>Median Income</td>
<td>$55,625</td>
</tr>
<tr>
<td>LEP (Spanish)</td>
<td>3.0%</td>
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Enhance Analysis:
- Contrast with State and County
  - % in poverty
  - % minority
  - median household income
- Consider other variables
  - Residential density
Enhance Analysis:

- List/quantify similar facilities
- Include distances
Title VI Equity Analysis
Determining Site or Location

DISCUSSION/QUESTIONS:

• Has anyone done a Title VI Equity Analysis for a facility location?
• Other approaches?

Considering new storage or maintenance facility?
Conduct Equity Analysis BEFORE land purchase?
Title VI Triggers

FARE OR FARE MEDIA CHANGE
Title VI Equity Analysis  
Change to Fare/Fare Media

Who: If a transit provider of:

1. Operates 50 or more fixed route vehicles in peak service AND is located in an Urbanized Area (UZA) of 200,000 or more in population; or

2. Provider placed in this category at the discretion of the Director of Civil Rights.

When:

1. Prior to implementation

2. Increase or decrease in fares

Purpose: To determine whether changes will have a disparate impact based on race, color, or national origin.
C. Title VI Equity Analysis
Change to Fare/Fare Media

Requirements:

– Develop written policy/procedures for *measuring* fare disparate impacts
– Conduct Title VI Equity Analysis: *low-income vs. minority populations*
– Identify *alternatives* if disparate impacts identified
– Present to governing board
– Include *procedures, results, and documentation* of Title VI Program Board approval
C. Title VI Equity Analysis
Change to Fare/Fare Media

Purpose of Service/Fare Media

- Analyze how the proposed change to fare/fare media will impact low-income & minority populations.
- Identify whether there will be a disproportionate impact.
- Identify methods to avoid, minimize, and mitigate disproportionate impacts.

IMPACT is change defined as a statistical difference between low-income or minority populations and the general public.
C. Change to Fare/Fare Media

Sample Approach

- Morongo Basin Transit Authority, Joshua Tree, CA
- 2013 Fare Analysis
Title VI Equity Analysis
Changes to Fare/Fare Media

WHY:
1. Fare increase recommended
   – not analyzed by COA
2. Concern about EQUITY by fare type
   – fare increases may be unfairly distributed among MBTA's ridership groups.

Note: Equity Analysis not required under Title VI for small transit providers.

EXPLORING EQUITY:
Answer guiding questions –
1. What was the average fare revenue per trip for the various passes?
2. What was the actual percentage discount between average fare and cash fare per trip?
3. What does actual utilization by fare type suggest regarding proposed fare increases and equity issues?
FINDINGS:

• Two instances of Equity Concerns:
  – Seniors/Disabled 50% cash fare increase, twice the Adult/Student cash fare increase of 25%
  – Seniors/Disabled 50% punch pass increase vs. ReadyRide general public base fare increase by 25%

• Monthly passes are undervalued

• Recommendations of new fare alternative:
  Equitable distribution of fare increases, within fare categories and across fare types/groups
Title VI Equity Analysis
Changes to Fare/Fare Media

PUBLIC PARTICIPATION: A FAIR FARE

- Following analysis, before implementation
- Publicized proposed increases and invited input
- Comments invited by:
  - phone
  - Mail
  - Email
  - 4 open houses
  - 1 public hearing
- Events widely advertised in English and Spanish
Title VI Equity Analysis
Changes to Fare Media

METROLINK FARE MEDIA ANALYSIS

Cashless Ticketing Device, Title VI Equity Analysis

• AMMA review of Metrolink Analysis for San Bernardino County Transportation Authority (SBCTA)
• Do cashless ticketing devices presented special difficulties for persons of low-income who are “unbanked”?
• Does this present a disparate impact to cash-based households?
Cashless Ticketing Device

• Cash based:
  – 20% of collected fare revenue
  – 40% of fare transactions
  – Suggests shorter trips more likely cash-based

• Hypothesis:
  – Transit dependent riders take short trips to travel quickly between communities.
  – May have more limited use of debit or credit cards, with associated fees

• Support:
  – TRB 2017 study saw high correlation between taxi users who pay cash and “unbanked”, low-income households (King & Saldarriaga, 2016)
C. Title VI Equity Analysis
Changes to Fare Media

About the region

- San Bernardino line, 6 stations, heaviest use among all lines
- Both rail and transit ridership in region are from low-income households

About Metrolink’s analysis

- Metrolink’s outreach did not adequately reflect local demographics
  - Insufficient representation of low-income
  - No platform interviews in Spanish
Conclusion

- AMMA questioned Metrolink conclusion: “share of minority respondents adversely impacted are just 3.2% greater than the share of the non-minority respondents”
- AMMA questioned Metrolink remediation of disparate impacts
- AMMA proposed securing retail outlets for Metrolink cash ticket purchase
DISCUSSION/QUESTIONS:

• Has anyone performed a Title VI fare equity analysis?
• Lessons learned?

BONUS BENEFIT – effective outreach upfront generates acceptance of subsequent fare increases
Title VI Triggers
Title VI Equity Analysis
Major Service Change

Who: If a transit provider

1. Operates 50 or more fixed route vehicles in peak service
   AND is located in an Urbanized Area (UZA) of 200,000 or
   more in population; or

2. Has been placed in this category at the discretion of the
   Director of Civil Rights.

When: PRIOR to implementation

Purpose: To determine whether changes will have a disparate
impact based on race, color, or national origin.
Title VI Equity Analysis
Major Service Change

Requirements:

– Develop major service change policy
– Develop written procedures to evaluate all service changes that exceed your major service change threshold.
– Conduct Equity Analysis
  • Looking for Disparate Impacts, Adverse Effects, or Disproportionate Burdens
– Present to governing board
– Include procedures, results, and documentation of Board’s approval/awareness in Title VI Program.
Major Service Change Policy

- Examples from Washington Metropolitan Area Transit Authority

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<tr>
<th>Parameters</th>
<th>Metrobus Definitions</th>
<th>Public Hearing Required?</th>
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<tbody>
<tr>
<td><strong>Span</strong></td>
<td>Increase or decrease in span of service on a line of more than <strong>one hour</strong> in a single fiscal year.</td>
<td>Yes, if there is a <strong>reduction</strong> of more than one hour in span of service on a line.</td>
</tr>
<tr>
<td><strong>Frequency</strong></td>
<td>Increase or decrease in revenue miles on a line of more than <strong>20%</strong> in a single fiscal year.</td>
<td>Yes, if there is a <strong>reduction</strong> of more than 20% in revenue miles.</td>
</tr>
<tr>
<td><strong>Coverage/Availability</strong></td>
<td>Increase or decrease in route miles on a line of <strong>15%</strong> in a single fiscal year. Projected Increase or decrease of <strong>10%</strong> of the riders on a line in a single fiscal year.</td>
<td>Yes, if there is a <strong>reduction</strong> of 15% in route miles. Yes, if there is a <strong>reduction</strong> of 10% of riders.</td>
</tr>
</tbody>
</table>
What is a “Major Service Change” for your agency?

– BASELINE: What is the change from?
– Policy based on approaching a threshold
– Consider:
  – Hours of Service
  – Miles of Service
  – Frequency
  – Routes

“The threshold for analysis shall not be set so high so as to never require an analysis; rather, agencies shall select a threshold most likely to yield a meaningful result in light of the transit provider’s system characteristics.”
FTA C4702.1B
Developing Implementation Guidance
Title VI Implementation Guidance

1. Print a Title VI Program and ensure and other materials are available at reception
   • Ensure Language Line information and instructions are available for all staff
     (office and operators that communicate with the members of the public).
   • Keep “I speak” flashcards at reception; on buses and available at public events
     ▪ Download and print at: https://www.lep.gov/ISpeakCards2004.pdf

2. Update all posted Title VI Notices to reflect current information.

3. Determine best alternative for website translation and implement.

4. Develop staff training program and materials and implement.
Handout: IMPLEMENTATION GUIDANCE

• What’s missing?
  – Title VI Documents on website
  – Complaint forms at reception
  – Is Title VI Notice on buses/in public buildings

• Who needs to know about Title VI?
  – Develop and Implement training
  – Supporting staff
  – Remembering Title VI Triggers

• Revisiting WHY?
Implementation Guidance

RESOURCES

• CalACT’s website
  http://www.calact.org/titlevi

• “I Speak Cards”

• Language Line Solutions

• FTA resources
Q&A and Discussion
Contact

• Valerie Mackintosh: Valerie@AmmaTransitPlanning.com

• Heather Menninger: Heather@AmmaTransitPlanning.com