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Title VI Compliance in Transit Planning

PRESENTED BY:

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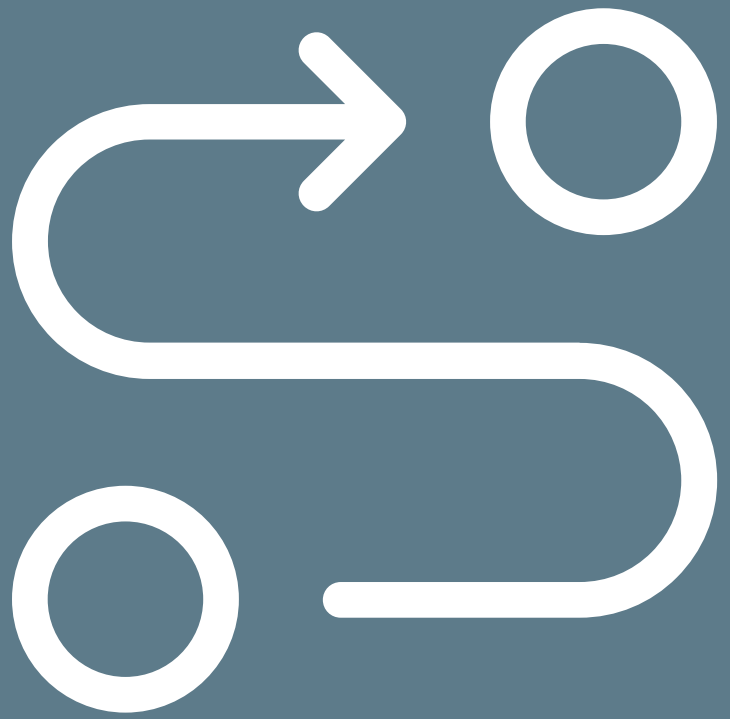
Agenda

1. Title VI in the Service Planning Process
2. Title VI and Emerging Mobility & Technology
3. Best Practices for Title VI Analyses in the Planning Process
4. Case Studies
5. Q&A

Title VI in the Service Planning Process



About TMD

- Our **core practice** is helping transit systems undertake operational analysis and network optimization
- **TMD actively uses Title VI** as part of our comprehensive approach to service planning:
  - Transit system reimagining
  - Operations reviews
  - Fleet/facility planning
  - Fare policy studies (pricing, media, access)
  - Public engagement

Our Planning Experience

Title VI in the Service Planning Context

- Title VI analyses evaluate whether proposed changes comply with Title VI of the Civil Rights Act of 1964
- Agencies receiving federal funds are required to comply with Title VI
- Service and fare analyses are only required for agencies with more than 50 peak buses/trains
- Agencies with less than 50 peak vehicles have reduced requirements

Requirement	Transit Providers that operate fixed route service	Transit Providers operating 50+ peak vehicles and located in a UZA of 200,000+
Set system-wide standards and policies	Required	Required
Collect and report data	Not required	Required: ▪ Demographic and service profile maps and charts ▪ Survey data regarding customer demographic and travel patterns
Evaluate service and fare equity changes	Not required	Required
Monitor transit service	Not required	Required

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The Path to Today's Title VI Requirements

2008

- Widespread service reductions in response to recession
- Service frequency and span reductions were common
- Riders and civil rights advocates questioned how service reductions were distributed

2012

- FTA responded with "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" circular (4702.1B)

Today

- Title VI analyses need to continue to evolve as transportation technology evolves

Key Questions Circular 4702.1B Sought to Answer

- "Who bears the burden when transit services are changed?"
- "Was there an unintended impact on low-income or minority communities?"

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Title VI and Emerging Mobility & Technology

Title VI & Emerging Mobility & Technology

- Emerging mobility options, such as microtransit, are increasingly popular for public transit agencies for various use cases:
    - Replacing low-performing fixed routes
    - Extending coverage in low-demand areas
    - First/Last mile connections
    - Providing service when demand is lower (i.e. late night/early morning, weekends)
- These new service models are often paired with complementary technologies such as mobile payments, app-based booking, and real-time trip planning that further reshape how riders access transit.

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Title VI & Emerging Mobility & Technology

- **Apply Title VI to all new technologies**
  - No prescriptive analyses are currently required for microtransit, these technologies didn't exist in 2012
  - Microtransit, TNCs and other novel transportation modes should be subject to analyses similar to traditional fixed-route services
- **Service replacement impacts**
  - When new technologies replace existing services, agencies must assess who is affected and how
- **Disproportionate benefits in new service areas**
  - When technologies are introduced in areas with no prior service, agencies should evaluate whether benefits are equitably distributed

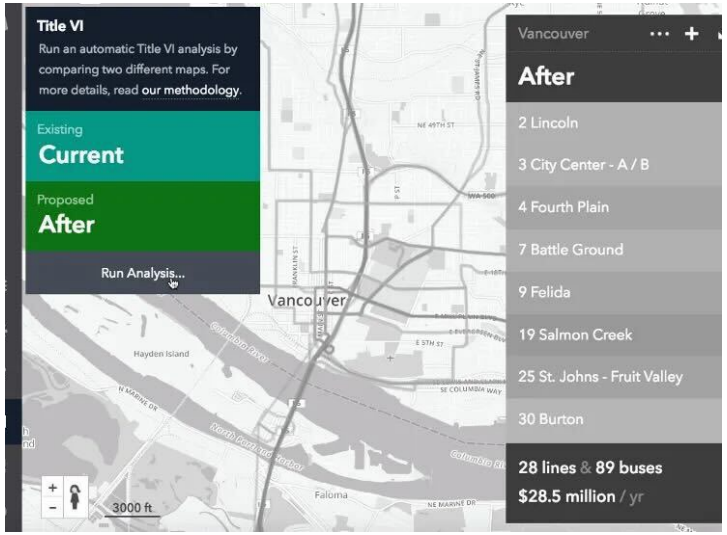
Best Practices for Title VI Analyses

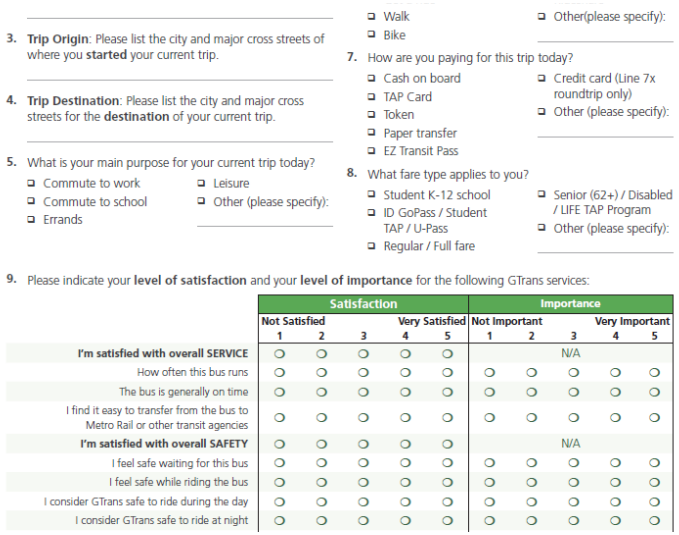
Integrate Title VI into the Planning Process

- Embed Title VI in the COA process
- Analyze during the recommendations phase
- Avoid incremental changes
- Include a public participation plan
- Share results with your board

Tools & Resources

Remix	On-Board Surveys	ArcGIS
Remix has built-in tools to conduct quick Title VI Analyses and analyze accessibility of low-income and minority populations	**On-Board Surveys** are key for understanding current rider demographics	With **ArcGIS**, Census data can be mapped to assess impacts to minority and low-income populations





3. **Trip Origin**: Please list the city and major cross streets of where you **started** your current trip.

4. **Trip Destination**: Please list the city and major cross streets for the **destination** of your current trip.

5. What is your main purpose for your current trip today?
   - ❑ Commute to work
   - ❑ Commute to school
   - ❑ Errands
   - ❑ Leisure
   - ❑ Other (please specify):

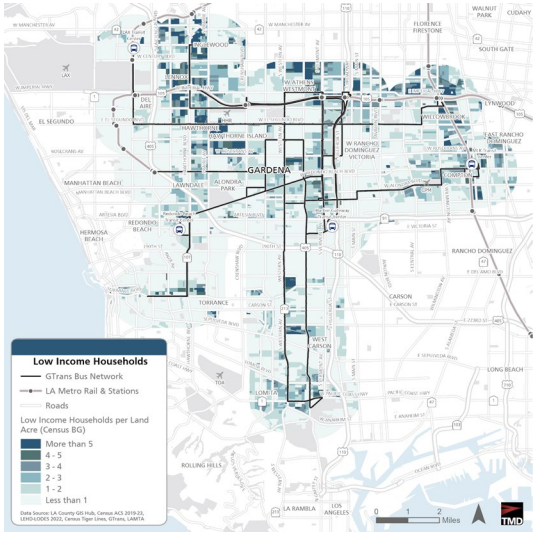
   - ❑ Walk
   - ❑ Bike
   - ❑ Other(please specify):

7. How are you paying for this trip today?
   - ❑ Cash on board
   - ❑ TAP Card
   - ❑ Token
   - ❑ Paper transfer
   - ❑ EZ Transit Pass
   - ❑ Credit card (Line 7x roundtrip only)
   - ❑ Other (please specify):

8. What fare type applies to you?
   - ❑ Student K-12 school
   - ❑ ID GoPass / Student TAP / U-Pass
   - ❑ Regular / Full fare
   - ❑ Senior (62+) / Disabled / LIFE TAP Program
   - ❑ Other (please specify):

9. Please indicate your **level of satisfaction** and your **level of importance** for the following GTrans services:

	Satisfaction					Importance				
	Not Satisfied				Very Satisfied	Not Important				Very Important
	1	2	3	4	5	1	2	3	4	5
I'm satisfied with overall SERVICE	○	○	○	○	○			N/A		
How often this bus runs	○	○	○	○	○	○	○	○	○	○
The bus is generally on time	○	○	○	○	○	○	○	○	○	○
I find it easy to transfer from the bus to Metro Rail or other transit agencies	○	○	○	○	○	○	○	○	○	○
I'm satisfied with overall SAFETY	○	○	○	○	○			N/A		
I feel safe waiting for this bus	○	○	○	○	○	○	○	○	○	○
I feel safe while riding the bus	○	○	○	○	○	○	○	○	○	○
I consider GTrans safe to ride during the day	○	○	○	○	○	○	○	○	○	○
I consider GTrans safe to ride at night	○	○	○	○	○	○	○	○	○	○



Case Studies

Case Study: OCTA Making Better Connections

- COA designed a major restructure of the OC Bus network
- Title VI analysis reviewed impacts of all proposed service changes at the system level
- Analyses based on **Annual Person-Trips**
- Results show no disparate impact or disproportionate burden from COA changes

Making Better Connections

Title VI Analysis Results		
Annual Person-Trips	**Existing**	**Proposed**
Percent of Minority Annual Person-Trips	73.4%	73.5%
Percent of Non-Minority Annual Person-Trips	26.6%	26.5%
Percent of Low-Income Annual Person-Trips	24.9%	24.9%
Percent of Non-Low-Income Annual Person-Trips	75.1%	75.1%

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Additional Case Studies

Facility Siting Analysis San Joaquin Regional Rail Commission	Agency conducted analyses of equity impacts of potential sites for rail maintenance facilities
Fare Equity Analysis METRO	Analyzed the impacts of potential changes to fare policy, including changes to points of purchase and changes to passes
Parking Policy Analysis BART	Agency analyzed whether or not changes in parking fees would pose a disparate impact or disproportionate burden

Conclusion

- **Embed Title VI throughout the planning process**, treat it as a planning tool, not a post-hoc compliance step.
- **A COA provides a greater opportunity for system-level equity analysis**, as OCTA demonstrated, evaluating all changes together can confirm equitable outcomes across an entire network restructure.
- **Present Title VI findings together** with all major planning efforts (COAs, SRTPs, and LRTPs).
- **Apply Title VI to all new modes and technologies** to ensure equitable distribution of benefits.
- **No prescriptive federal frameworks exist yet for new modes;** agencies doing rigorous analysis today can help shape federal policy tomorrow.
- **Start now!** Integrate system Title VI analysis into your next planning cycle to stay ahead of evolving requirements.

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Q&A