## **Title VI Equity Analysis Policies**

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File# 2025-0463

## Recommendation



Adopt the Title VI Service and Fare Equity Analysis Policies which include the following:

- Major Service Change Policy
- Disparate Impact Policy
- Disproportionate Burden Policy

The Federal Transportation Administration (FTA) requires transportation agencies to comply with Title VI by adopting policies per FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients"

 Metro Board of Directors is required to review and approve the Title VI Equity Analysis policies for service and fare changes every three years.

## Metro Title VI Equity Analysis Policies is required:

- Major Service Change Policy Establish a threshold for service changes
- Disparate Impact Policy Impact to minority riders
- Disproportionate Burden Policy Impact to low-income riders



**Major Service Change Policy** defines what constitutes a "Major Service Change" for the agency which will require a Service Equity Analysis.

- Current Metro policy states a Title VI Equity Analysis will be completed for all Major Service Changes presented to the Board
- Results will be included in the Metro Title VI Program Update with a record of action taken by the Board.
- There are no recommended changes to this Policy for 2025.



**Disparate Impact Policy** evaluates the effects on minority riders or populations as compared to non-minority riders or populations.

- Metro will analyze how the proposed service or fare change action may impact minority populations compared to non-minority populations.
- "Minority" is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.
- No recommended changes to this Policy for 2025.



**Disproportionate Burden Policy** evaluates potential effects on low-income populations, defined in the 2025 program update as \$69,350 for a four-member household.

The line and system level evaluations are identical to those used to determine potential disparate impacts

2025 policy change increases the low-income threshold from \$59,550 to \$69,350 consistent with the California Department of Housing and Community Development's (HCD) increased threshold.