Los Angeles County
Metropolitan Transportation
Authority
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Los Angeles, CA

Metro

Board Report

File #: 2025-0622, **File Type:** Program **Agenda Number:** 28.

EXECUTIVE MANAGEMENT COMMITTEE
SEPTEMBER 18, 2025

SUBJECT: 2025 TITLE VI PROGRAM UPDATE

ACTION: APPROVE RECOMMENDATION

RECOMMENDATION

ADOPT Metro's 2025 Title VI Program Update.

ISSUE

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination based on race, color, and national origin in programs that receive federal funding. The Federal Transit Administration (FTA) requires transportation agencies to demonstrate their compliance with Title VI by submitting a triennial Title VI Program Update in compliance with Title 49 CFR Section 21.9(b) and with FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients (Attachment A)," issued October 1, 2012. FTA requires the Metro Board of Directors to review and approve the Title VI Program Update prior to its submittal.

BACKGROUND

Section 601 of Title VI of the Civil Rights Act of 1964 (Title VI) states the following: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." Title VI sets the minimum federal requirements to prevent discrimination or benefits from being denied to federally protected groups. The Title VI Program Update consists of a report with supporting documentation that provides evidence of the equitable distribution of services, promotion of full and fair participation in public transportation decision-making without regard to race, color, or national origin, and meaningful access to transit-related programs and activities by persons with limited English proficiency. The monitoring of service provides a means to measure and adjust for impacts and benefits to protected groups, which supports Metro's goal of ensuring that impacts on marginalized groups are considered in transportation decisions and service delivery. The FTA reviews and concurs with the Title VI Program Update as submitted or requests additional information.

The last Title VI Program Update was submitted on September 29, 2022. Metro's next Title VI Program Update is due on October 1, 2025.

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DISCUSSION

Metro updates the Title VI Program every three years through an agency-wide coordination effort. In 2019, Metro established its Title VI Update Planning Committee, which includes representatives from all departments responsible for items needed for the update. The Title VI requirements are incorporated into projects, service and fare changes, and Limited English Proficiency (LEP) tools, and the committee ensures that Metro's Equity Platform always remains at the forefront. Metro will submit a Title VI Program Update that incorporates the requirements set forth in the FTA Circular 4702.1B (Attachment A). Metro, as a fixed route transit provider receiving Federal financial assistance and operating 50 or more fixed route vehicles in peak service, must include in the Title VI Program Update the following thirteen requirements:

1. The Notice to Beneficiaries of their civil rights under Title VI;
2. The development of complaint procedures and a complaint form;
3. A list of all transit-related complaints, investigations, or lawsuits;
4. A Public Participation Plan;
5. Meaningful access to Limited English Proficiency (LEP) persons;
6. Language Assistance Plan;
7. Minority representation on planning and advisory committees;
8. The provision of assistance to and monitoring of subrecipients;
9. Equity evaluations relating to the site and location of facilities;
10. Service standards and system-wide service policies;
11. The collection and reporting of demographic data;
12. The requirement to monitor transit service and report results;
13. The requirement to evaluate service and fare changes following Board adopted policies.

A more detailed description of these requirements can be found in FTA Circular 4702.1B included as Attachment A of this report.

For this submission, Metro incorporated the following changes to the Title VI Program:

- An updated list of Metro's Title VI transit-related complaints, investigations and lawsuits. There were no investigations conducted by external entities during this reporting period and no lawsuits filed against Metro pertaining to Title VI violations during this reporting period.
- An updated Public Participation Plan to include current demographic data on Metro's

stakeholders, public outreach efforts, and activities since the last update of October 2022;

- An updated Language Assistance Plan to include the updated LEP Four Factor Analysis results. The Analysis identified seven languages; however, Metro's customer service integrated voice response system is programmed for ten languages, with over 200 languages available to Metro customers on a regular basis;
- Updated demographic data for participants of Metro's planning and advisory committees to help identify opportunities to include different perspectives that are not yet represented on advisory bodies;
- Updated the Title VI Program due date and status for Metro's subrecipients;
- Provided update to Metro's current Board-adopted service standards and policies;
- Updated demographic data on Metro's stakeholders and distribution of service;
- Documentation of Metro's current Board approved service monitoring program;
- An updated Title VI equity analysis policies. The change to the policies include an increase in the low-income threshold to $69,350 for a four-member household in Los Angeles County.
- Documentation of the Title VI equity analyses conducted for Metro's fare and major service changes completed since the last Title VI Program submittal.

The Title VI Program Update is presented in Attachment B.

DETERMINATION OF SAFETY IMPACT

The requested action in this report will have no direct impact on the safety of Metro's employees or customers.

FINANCIAL IMPACT

Adoption of the Title VI Program Update has no direct impact on Metro's expenditure or revenues but compliance is a requirement of federal funding. Approval is consistent with the implementation of service included in the adopted FY2026 Budget.

EQUITY PLATFORM

Metro's equity efforts go above and beyond Title VI requirements. However, the Title VI Program focuses on the Title VI protected groups as required by the FTA Title VI Circular for Compliance. The requirement of setting Service Standards, monitoring service, and the adoption of equity analysis policies provides a means to measure and adjust for impacts and benefits to protected groups, which supports Metro's goal to ensure that impacts to marginalized groups are considered in transportation decisions and service delivery. The requirement to conduct Service and Fare Equity Analyses

following Metro's Disparate Impact and Disproportionate Burden thresholds ensures that the impacts on minority and low-income populations are evaluated and align with Metro's equity policies.

VEHICLE MILES TRAVELED OUTCOME

VMT and VMT per capita in Los Angeles County are lower than national averages, the lowest in the SCAG region, and on the lower end of VMT per capita statewide, with these declining VMT trends due in part to Metro's significant investment in rail and bus transit.* Metro's Board-adopted VMT reduction targets align with California's statewide climate goals, including achieving carbon neutrality by 2045. To ensure continued progress, all Board items are assessed for their potential impact on VMT.

While this item does not directly encourage taking transit, sharing a ride, or using active transportation, it is a vital part of Metro operations, as it ensures compliance with federal requirements under Title VI of the Civil Rights Act of 1964. Because the Metro Board has adopted an agency-wide VMT Reduction Target, and this item supports the overall function of the agency, this item is consistent with the goals of reducing VMT.

**Based on population estimates from the United States Census and VMT estimates from Caltrans' Highway Performance Monitoring System (HPMS) data between 2001-2019.*

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The recommendation supports strategic plan goal # 5, "Provide responsive, accountable, and trustworthy governance within the Metro organization" by adhering to civil rights requirements mandated by Title VI of the Civil Rights Act of 1964.

ALTERNATIVES CONSIDERED

The Board could decide not to approve the updated Title VI Program but federal regulations require Board approval before submitting to FTA. Failure to include Board approval may result in non-compliance with FTA program requirements and may result in suspension of federal grants by being non-compliant with civil rights requirements.

NEXT STEPS

Once Metro's 2025 Title VI Program Update is approved by Metro's Board of Directors, documentation of the approval will be included in the Title VI Program Update along with all additional approvals and submitted to FTA before the due date of October 1, 2025.

ATTACHMENTS

Attachment A - FTA Circular 4702.1B
Attachment B - 2025 Title VI Program Update

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