

**CapMetro**

# CapMetro Title VI Policy Update

April 10, 2024

# Why Title VI Applies to CapMetro

Title VI prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

\*Subsequent Federal regulations extended this protection to discrimination on the basis of income.



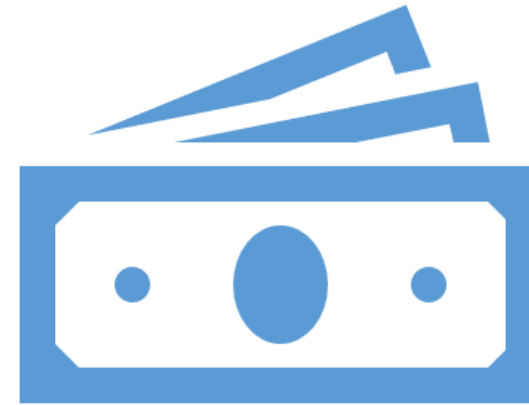
# Title VI Service Equity Analyses

Does this change unfairly impact:



Minority  
Populations?

“Disparate  
Impact”



Low Income  
Populations?

“Disproportionate  
Burden”

# CapMetro Title VI Policies

## Major Service Change Policy

When CapMetro is required to conduct service equity analyses

A service change that affects 25% of a route's annual miles or hours

## Disparate Impact/ Disproportionate Burden Policy

Determines how disproportionate impacts to minority and low-income populations are identified

When a minority or low-income population receives

- More than 2% of their share of the adverse effects of a service change, or;
- Less than 2% of the benefits of a service change

# Review of CapMetro Title VI Policies



# Summary of Updates to the Title VI Policy



Use data from our on-board survey, conducted every 5 years



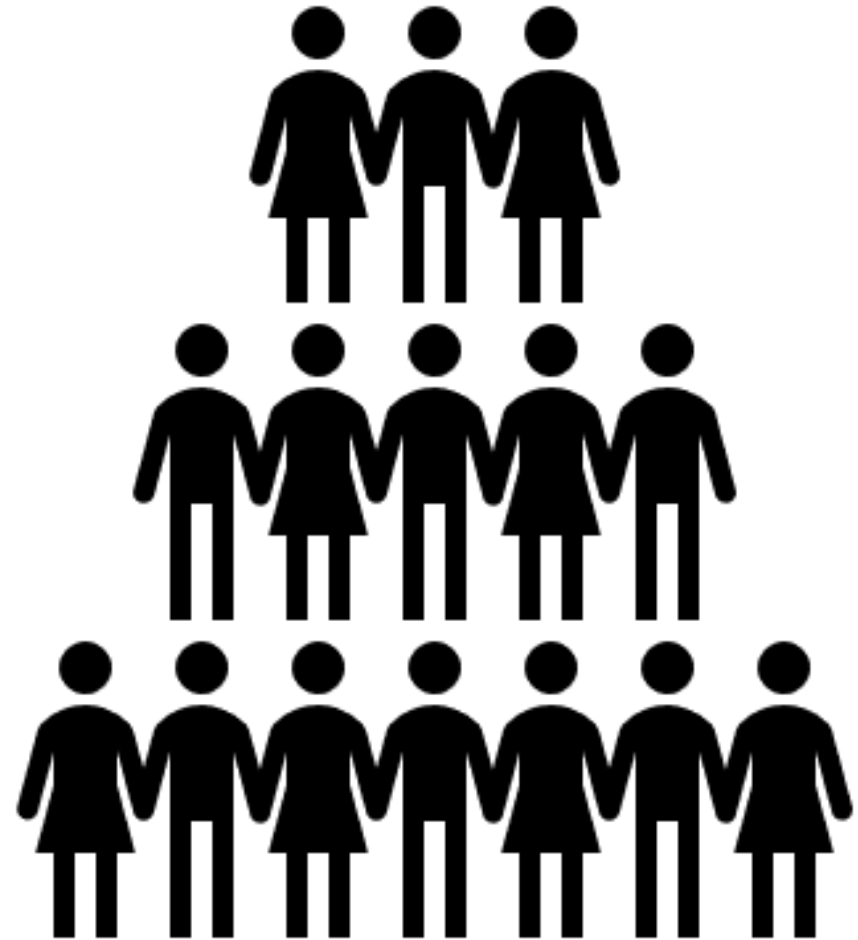
Update the analysis to include the service area average as the baseline for determining potential adverse impacts



# Updates to the Title VI Policy

Use data from our on-board survey, conducted every 5 years

- Utilizing the recent on-board survey data
- Statistically significant demographic info
- Most accurate picture of our riders
- Can vary from Census data



# Updates to the Policy - Example 1

Update the analysis to include the service area average as the baseline for determining potential adverse impacts

Hypothetical Example:

	Minority Riders on Route (On Board Survey)	Minority Riders in the Service Area (On Board Survey)	Disparate Impact Threshold	Difference	DI?
Route A	72%	69%	2%	3%	YES

$$72\% - 69\% = 3\%$$





# Updates to the Policy – Example 2

Update the analysis to include the service area average as the baseline for determining potential adverse impacts

Hypothetical Example:

	Low-Income Riders on Route (On Board Survey)	Low-Income Riders in the Service Area (On Board Survey)	Disproportionate Burden Threshold	Difference	DB?
Route B	80%	49%	2%	31%	YES

$$80\% - 49\% = 31\%$$

# Updates to the Policy – Example 3

Update the analysis to include the service area average as the baseline for determining potential adverse impacts

Hypothetical Example:

	Minority Riders on Route (On-Board Survey)	Minority Riders in Service Area (On-Board Survey)	Disparate Impact Threshold	Difference	DI?
Route C	30%	69%	2%	-39%	NO

$$30\% - 69\% = -39\%$$

# What happens when there is a finding?



**REVISIT**



**MITIGATE**



**IMPLEMENT**

# Public Engagement Efforts



**WEBPAGE**



**EMAILS**



**PRINTED FLYERS**



**TEXT ALERTS**



**AT-STOP SIGNAGE**



**OUTREACH AT  
STOPS**



**ADVISORY  
COMMITTEE  
PRESENTATIONS**



**ONLINE VIRTUAL  
OPEN HOUSE**



**PUBLIC HEARING  
(APRIL 10<sup>TH</sup>)**



**BOARD ACTION (MAY  
20<sup>TH</sup>)**



# How to Provide Feedback



- [www.capmetro.org/TitleVIcompliance](http://www.capmetro.org/TitleVIcompliance)
- Email us at [engage@capmetro.org](mailto:engage@capmetro.org)
- Join us for a public hearing at 2910 E 5<sup>th</sup> Street on April 10, 2024 @ 12:15PM



Thank you!

**CapMetro**

**Thank you!**