Title VI Policy Update

Sound Transit Executive Committee

July 7, 2022

SOUND TRANSIT

Why we are here

Updates to key Title VI policies

- **Major Service Change Policy** (R2013-18)
- **Fare Change Policy** (R2013-19)

Request recommendation to full Board

- Adopt new Disparate Impact and Disproportionate Burden Policy

Policy Updates Necessary This Year
Responsive to FTA comments from 2019 submission

- FTA requires equity analysis of disparate impacts on **minority** and disproportionate burdens on **low-income** populations

- **Major Service Change Policy** defines when a service change requires an equity analysis and sets threshold for disparate impact or disproportionate burden (R2013-18)

- **Fare Change Policy** sets threshold for determining disparate impact or disproportionate burden in equity analysis required for all permanent fare changes (R2013-19)

- Proposed update would consolidate and replace R2013-18 and R2013-19 with new combined policy

SOUND TRANSIT

Major Service Change Definition

Proposed updates to better reflect growing system

Determine if potential service change is "Major"	
Current	**25%** change in **platform hours** and/or **½ mile** (bus) or **½ mile** (rail) change in stop location
Proposed	**25%** change in **revenue hours** and/or **¼ mile (bus)** or **½ mile** (rail) change in stop location

SOUNDTRANSIT

Title VI Protected Route Threshold

Prioritize routes serving large Title VI populations

	Compare the percentage of low-income and minority populations in the route's service area to the district average.
Current	Any numerical difference above district average, in practice **0% absolute difference,** identifies a Title VI protected route.
Proposed	**5% absolute difference for individual changes** identifies a Title VI protected route.

SOUNDTRANSIT

New Systemwide Analysis

Identify total amount of benefits and impacts over time

Compare benefits and impacts to Title VI protected & non-protected populations on all routes with changes over multiple years	
Current	No systemwide and cumulative evaluation process
Proposed	**For all changes implemented in past two years & proposed changes for next year**
	20% more negative impact or less benefit to Title VI protected populations identifies potential equity impact

Systemwide Analysis Example

Proposed service reduction on multiple routes

Example District Population:
1,000,000
Low-Income: 400,000
Non Low-Income: 600,000

Population Impacted:
250,000
Low-Income: 110,000
Non Low-Income: 140,000

Population Comparison

Low-Income:
110,000 ÷ 400,000 = 27.5%

Non Low-Income:
140,000 ÷ 600,000 = 23.3%

Threshold Test

$$\frac{27.5\%}{23.3\%} = \textbf{118\%}$$

Within 20% threshold, no finding

SOUND TRANSIT

Fare Change & Facility Site Evaluation

Compare Fare Change impacts to Title VI protected populations by comparing with census data of district average	
Current	Any numerical difference from system average, in practice **0% absolute difference,** identifies a potential equity impact
Proposed	**20% more impact** to Title VI protected populations using relative difference (ratio) identifies potential equity impact

Compare Facility Siting impacts to Title VI protected populations by comparing with census data of district average	
Current	No explicit policy in place, but any numerical difference from system average used, in practice **0% absolute difference,** to identify a potential equity impact
Proposed	**5% absolute difference** from system average identifies a potential equity impact.

SOUNDTRANSIT

Public Engagement

Stakeholder Presentations

- Transportation Access Coalition (TAC)
- Citizens Accessibility Advisory Committee (CAAC)

Public Engagement

- Dedicated website
- Press release with translated survey
- Social media

SOUND TRANSIT

Action to Be Requested

Replace R2013-18 and R2013-19 with updated policy

- Consider recommendation of R2022-19 to full Board

- Replace R2013-18 and R2013-19

- Update when equity analysis required for service changes, fare changes and facility site selection

- Add statistically significant thresholds to identify potential equity impacts

- Add a new systemwide analysis step

- Add new facility site selection criteria and threshold

SOUNDTRANSIT

Thank you.

SoundTransit

soundtransit.org