



Date of Memo: July 11, 2023  
Current Meeting: July 20, 2023  
Board Meeting: July 27, 2023

**BOARD MEMORANDUM**

**TO:** Indianapolis Public Transportation Corporation (IPTC) Board of Directors  
**THROUGH:** President/CEO Inez P. Evans  
**FROM:** Manager of Special Projects and Regional Mobility Integration Ryan Wilhite  
**SUBJECT:** Consideration and approval of revised 2027 Transit Network Service Equity Analysis

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**ACTION ITEM A – 3**

**RECOMMENDATION:**

In accordance with FTA Requirements and IPTC Board-adopted Title VI policies, IPTC staff is recommending approval of the revised analysis and its findings.

**BACKGROUND:**

The IPTC Board of Directors approved the 2027 Transit Network Service Equity Analysis on January 26, 2023. The document provided is a revision to that analysis.

A service equity analysis is required when service changes trigger IPTC’s Major Service Change policy and last longer than 12 months; these system-wide service changes meet or exceed thresholds established by the Major Service Change policy. The 2027 Transit Network alters the future transit network that IPTC was building towards. The equity analysis, however, must compare the existing network (in this case October 2021) to the future network and will not compare future to future; that work was conducted, to some degree, as part of the planning work. Equity analyses are intended to evaluate the impacts of significant policy changes upon minority and low-income populations relative to non-minority and non-low-income populations pursuant to Title VI of the 1964 Civil Rights Act and federal guidance. Any changes that do not provide similar benefits to minority or low-income populations, as defined by IPTC’s established Title VI policy,<sup>1</sup> are considered a disparate impact (DI) or disproportionate burden (DB), respectively.<sup>2</sup>

**DISCUSSION:**

The revised version corrects minor errors in the original 2027 Transit Network, which were discovered by IPTC staff after the IPTC Board of Directors approved the analysis. Prior to presenting the revised version, IPTC staff conferred with RLS and Nelson Nygaard to confirm the errors and take action to correct them. Full details on the differences between the original 2027 Transit Network SEA and the revised version can be found in a separate memorandum.

The revised 2027 Transit Network service changes resulted in a finding of no DI/DB. This service equity analysis compared the existing transit network (as of October 2021) to the proposed 2027 network, evaluating the impacts of significant policy changes upon minority and low-income populations relative to non-minority and non-low-income populations pursuant to Title VI of the 1964 Civil Rights Act and federal guidance. Full implementation of IPTC’s network redesign, as illustrated by the 2027 Transit Network map, will produce a 26 percent increase in the number of weekly

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<sup>1</sup> Available from <https://www.indygo.net/about-indygo/title-vi/>

<sup>2</sup> A finding of a potential disparate impact and/or disproportionate burden requires transit agencies to modify the original proposal and re-analyze. If the modification does not resolve the DI/DB, then alternatives must be presented to the public for comment. The original proposal (or modification) can only be implemented if there is a substantial legitimate justification made and none of the proposed alternatives would have a less disparate impact, assuming all proposed alternatives can accomplish the program’s goals.

transit trips provided to Marion County residents. Additional information about the results of the analysis can be found in the analysis itself, which is attached to the agenda.

**ALTERNATIVES:**

After reviewing, the Board of Directors could choose to not approve. Major service changes, however, cannot take effect until a service equity analysis has been reviewed and approved by the board. IPTC could continue to implement future service changes but only those as previously approved by the IPTC Board of Directors, specifically the System-wide Service Changes approved by the IPTC Board of Directors on April 23, 2020. Any major service changes differences between the 2027 Transit Network and the network adopted on April 23, 2020 may likely need to be rolled back to comply with Title VI regulations.

**FISCAL IMPACT:**

The current findings of the 2027 Transit Network Service Equity Analysis (SEA) requires no additional IPTC financial resources beyond those already committed to the system-wide service changes.

**DBE/XBE DECLARATION:**

Not applicable.

**STANDING COMMITTEE DISCUSSION/RECOMMENDATION:**

This action will be reviewed by the Service Committee on July 20, 2023.