



Date: March 11, 2022
Current Meeting: March 17, 2022
Board Meeting: March 24, 2022

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 Route 901 Service Changes Service Equity Analysis

ACTION ITEM A – 5

RECOMMENDATION:

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

BACKGROUND:

In October 2020, IPTC instituted service changes in response to COVID-19. Five routes were affected: Route 8, 10, 90, 901 and 902. Reducing frequency on these routes balances the need to provide service for the network with the difficult reality of the low ridership experienced by these routes. Also, Routes 8 and 10 service frequencies were new additions in early 2020 and the productivity of the routes were significantly affected by the local adjustment to COVID-19. The reduction in frequency on the Red Line is considered to be temporary; the Red Line has experienced a significant drop in ridership, at first due to local and state mandated business closures and now continued by a significant and, for some, possible permanent move of offices to a work-from-home strategy.

Service modifications without conducting a service equity analysis (SEA) are permitted if they are considered temporary, lasting less than twelve months. If the modifications extend beyond twelve months, then an analysis may be required. An analysis is required when the changes meet the determination of a major service change. Each route was examined and only the change for Route 901 met the major service change determination.

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,¹ are considered a disparate impact (DI) or disproportionate burden (DB), respectively.²

DISCUSSION:

Staff completed a memorandum for the October 2020 changes to be confirmed on October 2021. However, staff overlooked two route changes – the 901 and 902. In reviewing these two routes, it was determined that the 901 met the major service determination, which resulted in the need to conduct a SEA. The frequency reduction for the Route 901 resulted in an 18.2 percent reduction in trips in the corridor. There was no change in alignment, however.

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

² 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.

IPTC compared the Existing 2020 network to the Proposed 2020 network, analyzing the difference through a Title VI lens. The reduction in service did not result in a Title VI finding, based on the analysis completed.

ALTERNATIVES:

After reviewing, the Board of Directors could choose to not approve; however, we would be non-compliant with Title VI regulations and would likely need to return to the Board for approval.

FISCAL IMPACT:

The current findings require no additional IPTC financial resources.

DBE/XBE DECLARATION:

Not applicable.

STANDING COMMITTEE DISCUSSION/RECOMMENDATION:

This action will be reviewed by the Service Committee on March 17, 2022.