



Date of Memo: January 12, 2023
Current Meeting: January 19, 2023
Board Meeting: January 26, 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 October 2021 Service Changes Service Equity Analysis

ACTION ITEM A – 3

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:

The services being analyzed are the emergency service reductions that occurred in October 2021; these were intended to be temporary service reductions. The service changes were the result of operator shortages that were causing IPTC to perform poorly in the months prior. The service change resulted in significant modifications to nearly a third of IPTC routes, while the remainder were unaffected.

The change was intended to be temporary; to continue until IPTC could increase its total operator numbers. The changes, however, lasted beyond October 2022. The FTA allows a service provider to effect temporary service modifications (that trigger the major service change) without a service equity analysis as long as the modifications do not last longer than twelve months. With the twelve months elapsed, IPTC staff analyzed the changes to understand if there was a disparate impact and/or disproportionate burden.

A service equity analysis is required when service changes trigger IPTC’s Major Service Change policy; these system-wide service changes meet or exceed thresholds established by the Major Service Change policy. 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, are considered a disparate impact (DI) or disproportionate burden (DB), respectively.

DISCUSSION:

The October 2021 changes include minor, moderate, and significant changes. No routes were eliminated or added but some routes experienced a right-sizing of their frequency. These changes are a direct result of operator shortages which negatively affected on-time performance. The major service change was considered at the time temporary but lasted longer than twelve months.

The October 2021 emergency service changes resulted in a finding of no DI/DB. The service modification was intended to be temporary but lasted longer than twelve months, which required the service equity analysis. The emergency service cuts resulted in an overall loss of trips of 9 percent, largely affected by reducing peak trips for multiple routes.

ALTERNATIVES:

After reviewing, the Board of Directors could choose to not approve. The service changes, however, cannot take effect until this analysis has been reviewed and approved by the IPTC Board of Directors.

FISCAL IMPACT:

The current findings of the October 2021 Service Equity Analysis (SEA) require 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 January 19, 2023.