



Date of Memo: February 08, 2023
Current Meeting: February 16, 2023
Board Meeting: February 23, 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 Resolution 2023-02 for the 2023 Title VI Program Update

ACTION ITEM A – 4

RECOMMENDATION:

Staff recommends the IPTC Board of Directors review, consider, and adopt the Title VI Program Update.

BACKGROUND:

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. To provide guidance on this issue, the Federal Transit Administration (FTA) issued Circular 4702.1B in October 2012 which outlines Title VI compliance procedures for recipients of FTA-administered transit program funds. As a recipient of FTA-administered federal funding, IPTC must meet the requirements established in this document.

DISCUSSION:

An updated Title VI Program is due to the FTA. Under the FTA guidelines, IPTC is required to seek review and approval of its Title VI Program Update. Some Title VI required documents do require approval outside the Title VI Program Update. Those documents include, but are not limited to, the service and fare equity analyses and adoption of the Service Standards.

The Title VI Program Update outlines our agency's processes and procedures for fulfilling the federal requirements for Title VI of the Civil Rights Act of 1964. We document our compliance for a variety of topics, including:

- Title VI notice
- Instructions on how to file a Title VI complaint
- List of Title VI investigations
- Public participation plan
- Language assistance plan
- Documentation of composition of voluntary boards
- Subrecipient compliance
- Facility (or Site) equity analyses
- Service standards
- Demographic maps
- On-board survey results
- Results of service monitoring
- Major Service Change policy
- Service or Fare equity analyses

Two items to highlight – service monitoring report and the site equity analyses. The service monitoring report is completed at the same time as the Title VI Program Update. The analysis is a comparison of the performance of the system over a period of time to ensure that no disparate impact (DI) or disproportionate burden (DB) is occurring as a result of the service delivered. This analysis differs from a service equity analysis because the monitoring report considers actual service provided whereas the service equity analysis is comparing existing scheduled service and proposed scheduled service. After analyzing our service over the length of a single pick (period of four months), we found no major issues; one metric was considered a disproportionate burden (vehicle assignment) but our overall average age of vehicles is low, so we consider this DB to not be a considerable concern.

Site equity analyses are conducted prior to the purchase of a facility/site that is not being purchased using federal funds; those sites are analyzed through a planned process known as NEPA – National Environmental Policy Act. We completed a number of site equity analyses since the end of 2019 and those are included, in full, in the report. In conducting these analyses, staff examines alternative sites, analyzes site-specific metrics, including demographics, and determines the impact to the community of IPTC's project purpose. None of the site equity analyses found any concern with the chosen sites.

The 2023 Title VI Program in its entirety is included in the packet.

If approved, IPTC will submit the final board adopted program and policies to the Federal Transit Administration (FTA) in late February or early March 2023.

ALTERNATIVES:

The Board could choose to delay approval, but a Title VI Program Update needs to be completed to satisfy Federal regulations.

FISCAL IMPACT:

There is no fiscal impact for this approval.

DBE/XBE DECLARATION:

This is not a procurement.

STANDING COMMITTEE DISCUSSION/RECOMMENDATION:

This action will be reviewed by the Service Committee on February 16, 2023.