MEMORANDUM

To: TARC Board of Directors

From: Ozzy Gibson, Executive Director

Date: May 28, 2025

Re: Resolution 2025-15 Title VI Service Equity Analysis Policy Amendment

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TARC is in the process of developing TARC 2025 Draft Plans for network restructuring and efficiency improvements to be implemented in the Summer of 2026. Along with this process, TARC reviewed and evaluated our current Title VI Policies for Service Equity Analysis (SEA) to ensure these policies are updated and can be applied for service equity analysis for the entire systemwide network.

Why Amend the Title VI Policy

TARC's 2013 Title VI Service Equity Policies were written over 10 years ago and needed a minor update to be applicable to future systemwide service changes and the upcoming network restructuring process.

Minimal Amendments

The most significant parts of the TARC Title VI Service Equity Policy are its thresholds that trigger a Service Equity Analysis: (1) the degree of change in service that triggers an equity analysis (25%), and (2) the degree of difference that is considered acceptable between protected and non-protected populations' experiences of a change (10%). We recommend leaving those thresholds as they are.

Some minimal amendments would make this policy usable for the network redesign, while also clarifying some terms. The amendments are as follows:

1. Clarifying that the change in service that is considered "major", triggering an equity analysis, would be a change that increases either the revenue hours or revenue miles on a route in a typical weekly schedule.

2. Clarifying that the degree of acceptable difference between populations is 10 percentage points.

The above clarifications are consistent with the usual interpretation of those terms, both within TARC and among peer agencies. However, the existing policy leaves it vague, and thus a clarification is recommended.

3. Allowing the measurement of equity impacts on routes individually or cumulatively.

   This is the norm among peer agencies. An equity analysis must be performed for a Major Service Change; however, the analysis can be performed either on an individual route analysis (old-route-compared-to-new-route) or on a cumulative analysis (old group of routes compared to new group of routes) basis.

TARC has a longstanding commitment to meet both, the spirit and letter of Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin in programs or activities that receive federal financial assistance.

Public Participation Process

In accordance with the TARC's Public Participation Policy, TARC has solicited public comments on the proposed SEA Policy Amendment through various channels of communication, and through the three open-house public meetings held on April 22nd, 23rd, and 24th, 2025.

Additionally, TARC invited a group of the community representatives to participate in a focus group discussion led by TARC staff and the JWA consultant. The focus group participants did not express any concerns with the proposed Policy amendment.

While the public had questions and discussed the policy amendment with TARC team, we did not receive any comments nor concerns specific to the policy amendment itself.

The public has been solicited to comment through a news release widely distributed through the TARC website, media, local elected officials, and social media. TARC solicited comments through the ridetarc.org website, phone line, and social media outlets Twitter and Facebook. The public can provide comments to TARC at any time via phone, email, letters and social media.

Attached to this Memo is the final language of the SEA Policy Amendment, and the Major Service Change Policy as adopted in Title VI Program from 2013.

The attached resolution seeks the TARC's Board of Directors approval of the Title VI Service Equity Analysis Policy Amendment.

If you have any questions, please contact me at 502-561-5100.

Resolution 2025-15 - Title VI Service Equity Analysis Policy Amendment

WHEREAS, TARC is in the process of developing TARC 2025 Draft Plans for network restructuring and efficiency improvements to be implemented in the Summer of 2026; and

WHEREAS, along with this process, TARC reviewed and evaluated its current Title VI Policies for Service Equity Analysis (SEA) to ensure these policies are updated and applicable for service equity analysis for the entire systemwide network; and

WHEREAS, TARC's 2013 Title VI Service Equity Policies were written over 10 years ago and need a minor update to be applicable to future systemwide service changes and the network restructuring process; and

WHEREAS, the most significant parts of the TARC Title VI Service Equity Policy are its thresholds that trigger the Equity Analysis Review: (1) the degree of change in service that triggers an equity analysis (25%), and (2) the degree of difference that is considered acceptable between protected and non-protected populations' experiences of a change (10%); and

WHEREAS, those thresholds are not subject to this Policy Amendment and remain as they are; and

WHEREAS, amendments will make this policy usable for the network redesign, while also clarifying some terms; and

WHEREAS, the minimal amendments are as follows:

- clarifying that the change in service that is considered "major", triggering an equity analysis, would be a change that increases either the revenue hours or revenue miles on a route in a typical weekly schedule; and
- clarifying that the degree of acceptable difference between populations is 10 percentage points; and
- allowing the measurement of equity impacts to be performed on routes individually or cumulatively; and

WHEREAS, these clarifying changes are a commonly accepted interpretation, both within TARC and among peer agencies; and

WHEREAS, the purpose of the Title VI Equity Analysis and evaluation process is to address any potential impact of major service changes on TARC's passengers, minority and low-income populations; and

WHEREAS, TARC has a longstanding commitment to comply with Title VI of the Civil Rights Act of 1964 that prohibits discrimination based on race, color or national origin in programs or activities that receive federal financial assistance; and

WHEREAS, TARC's goal is to avoid, minimize, or eliminate any adverse impact of service changes that would be borne disproportionately by minority or low-income populations; and

WHEREAS, in accordance with TARC's Public Participation Policy, TARC has solicited public comments on the proposed Service Equity Analysis Policy Amendment through various channels of communication, and in person with numerous open house public meetings held in April 2025; and

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Transit Authority of River City that:

The TARC Title VI Service Equity Policy Amendment is hereby approved.

Adopted this 28th day of May 2025.

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Steve Miller, Chair of the Finance Committee