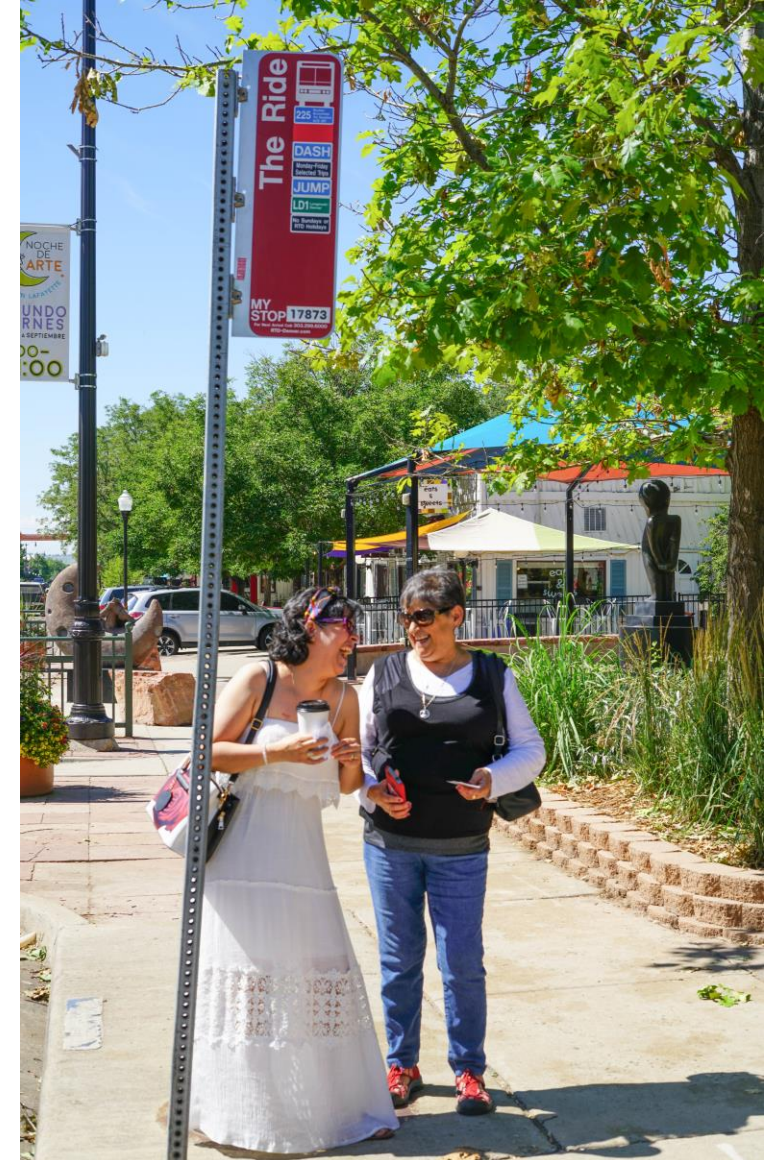




2025 Civil Rights Title VI Proposed Policy Changes

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Agenda

- Meeting objectives
- Overview of Civil Rights Act (Title VI) requirements
- Proposed policy changes
 - Major Service Change Policy
 - Low-Income Definition
 - Fare Equity Policy
- Closing Q&A

Objectives

- Understand Title VI requirements under the Civil Rights Act of 1964 and federal regulations
- Explore the Title VI Program's purpose and key parts
- Examine proposed changes to Title VI policies: Major Service Change Policy, Low-Income Definition, Fare Equity Policy
- Share feedback on proposed Title VI policy changes



Requirements Overview

Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964



“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Title VI Civil Rights/Transit Equity Goals

- Equity means fairness or justice in the way people of different races, colors, languages spoken, etc. are treated, and how benefits and burdens are distributed among them
- Fair distribution of transit services
- Full, fair participation in public transportation decision making
- Meaningful access to transit-related programs for linguistically diverse populations
- Ensure people of color and low-income customers are not unfairly affected by agency level decisions or projects

RTD Title VI Civil Rights Program

■ RTD's compliance approach

- Follows guidelines set by the Federal Transit Administration (FTA Circular 4702.1B)
- Includes policies, standards and analysis to prioritize equity
- Tools and plans for compliance
 - Equity analysis: evaluating impacts on different communities
 - Service monitoring: assessing equitable service delivery
 - Community engagement: incorporating public feedback (e.g., Public Participation Plan and Language Access Plan)

2022 TITLE VI Program Update

Submitted in fulfillment of Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B



Proposed Policy Changes



January 27, 2025



Major Service Change Policy

Expanding the criteria

January 27, 2025

Service Changes

- **RTD reviews, proposes, and implements changes to its service schedules three times a year**
 - Typically take effect in January, May/June, and September
- **Service changes support multiple objectives:** improve on-time performance, account for changes in ridership, advance RTD's System Optimization Plan
- **Five categories:**
 - Route adjustment
 - Seasonal adjustment
 - Service increase and service reduction
 - Schedule timing



What is a Major Service Change Policy?



- The Federal Transit Administration requires transit providers to evaluate impacts of proposed major service changes on BIPOC and low-income communities
- The transit provider must identify what count as a “major service change” for its system
- Examples: a change that affects “x” percent of a route, “x” number of route miles or hours, or the number of people affected
- **RTD’s Current Policy:** A major service change is defined as a 25% increase or decrease in service hours on a route or line lasting 12+ months

Proposed Major Service Change Policy

■ Current Policy

- A major service change is defined as a 25% increase or decrease in service hours on a route or line lasting 12+ months

■ Proposed Changes

- A major service change will include any 25% change (+/-) in service hours, route miles, service span and frequency
 - Includes changes made at one time or cumulatively over a 36-month period
 - It also applies to implementation, elimination or discontinuing a route or line
- **Goal:** Broaden the criteria for equity analyses, remove the 12-month minimum for changes, and include small changes over 36 months that may add up to 25% change

What if a Change is a “Major” Service Change?

- RTD must do an analysis to compare impacts between:
 - Black, Indigenous and People of Color (BIPOC) populations and non-BIPOC populations
 - Low-income and non-low-income populations
- If an impact is found, RTD must “avoid, minimize, or mitigate potential disparate impacts”
- RTD may only implement a major service change if:
 - There is “substantial legitimate justification”
 - There are no alternatives that would have less impact while still accomplishing RTD’s goals

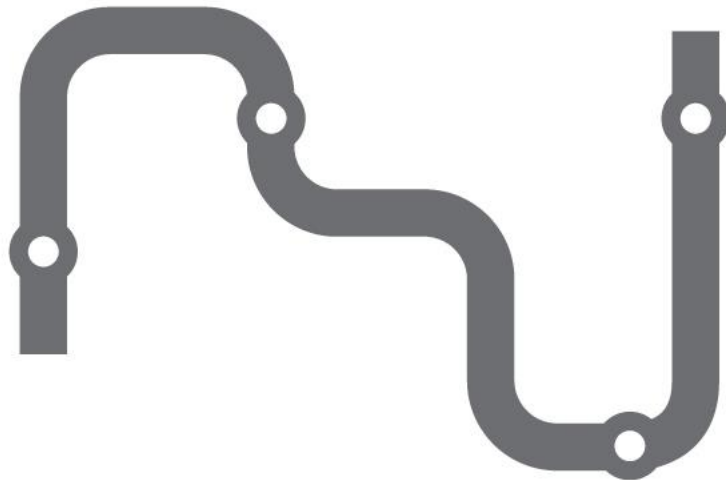


Route Adjustment: Route Decrease

Example: Route length would be reduced by 5 miles, or by 25%

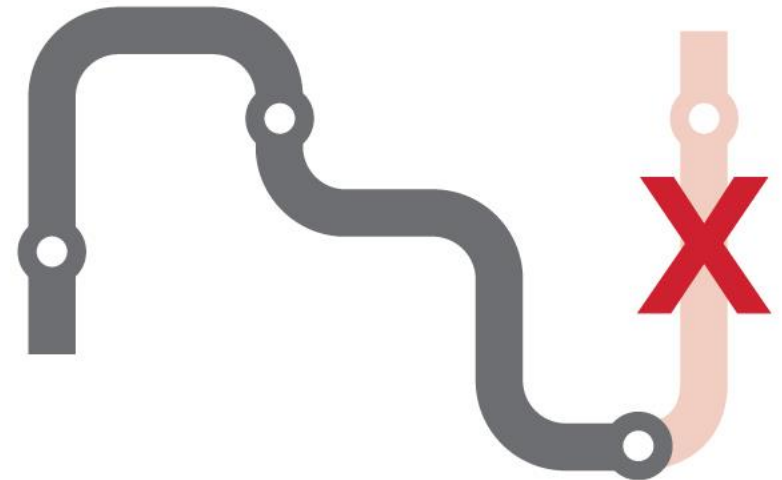
BEFORE Route Adjustment

Total length = 20 miles



AFTER Route Adjustment

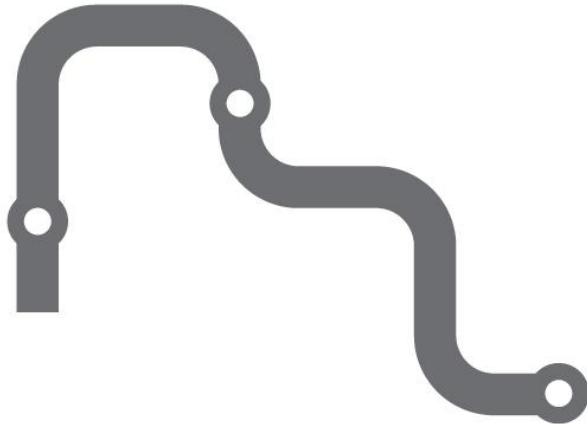
Total length = 15 miles



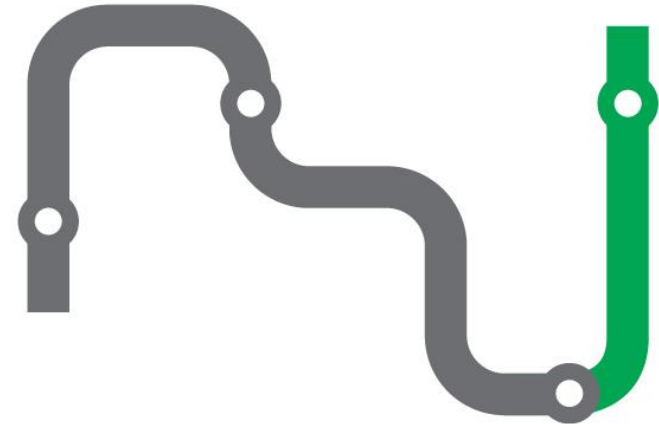
Route Adjustment: Route Increase

Example: Route length would be increased by 5 miles, or by 33%

BEFORE Route Adjustment
Total length = 15 miles



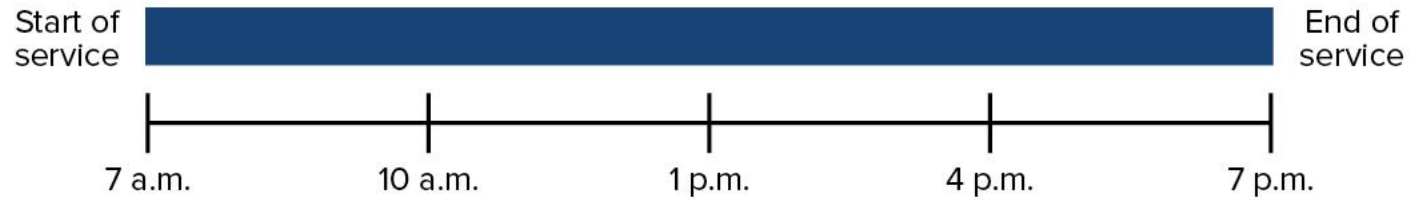
AFTER Route Adjustment
Total length = 20 miles



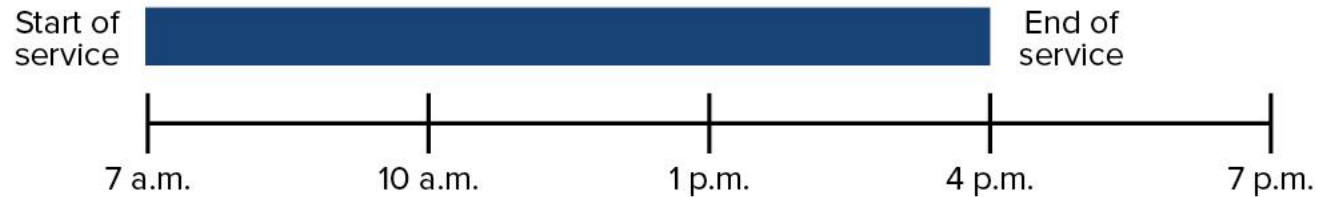
Service Reduction: Operating Hours

Example: Service would be reduced from 12 hours to 9 hours per day, or by 25%

BEFORE Service Reduction



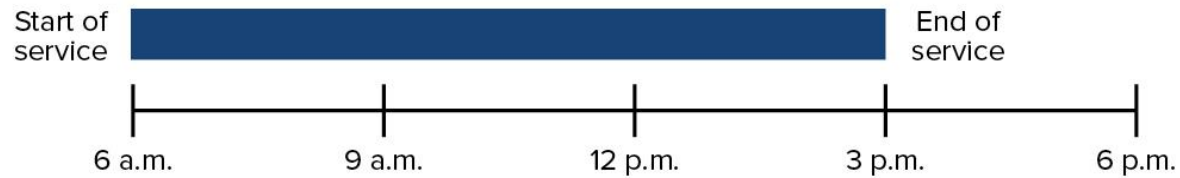
AFTER Service Reduction



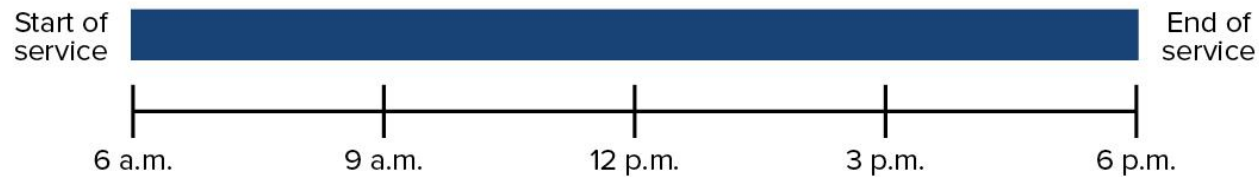
Service Increase: Operating Hours

Example: Service would be increased from 9 hours to 12 hours per day, or by 33%

BEFORE Service Increase



AFTER Service Increase



Service Reduction: Frequency

Example: Service would be reduced from 4 buses to 3 buses per hour, or by 25%

BEFORE Service Reduction

4 buses per hour = every 15 minutes



AFTER Service Reduction

3 buses per hour = every 20 minutes



Service Increase: Frequency

Example: Service would be increased from 3 buses to 4 buses per hour, or by 33%

BEFORE Service Increase

3 buses per hour = every 20 minutes



AFTER Service Increase

4 buses per hour = every 15 minutes



Questions and Providing Feedback

- **Current Policy:** A major service change is defined as a 25% increase or decrease in service hours on a route or line lasting 12+ months
- **Proposed Changes**
 - A major service change will include any 25% change (+/-) in service hours, route miles, span of hours and frequency
 - Includes changes made at one time or cumulatively over a 36-month period
 - It also applies to implementation, elimination or discontinuing a route or line
- **Questions?**
- Do you agree or disagree with this proposed policy change? **Take the survey!**





Low-Income Definition

Redefining “low income” from 150% to 200%

Proposed Low-Income Definition

■ Current Policy

- A household is considered low-income if their income is at or below 150% of the federal poverty guidelines

■ Proposed Changes

- Increase threshold to at or below 200% of federal poverty guidelines

■ Goal: Better represent low-income households in service and fare change analyses

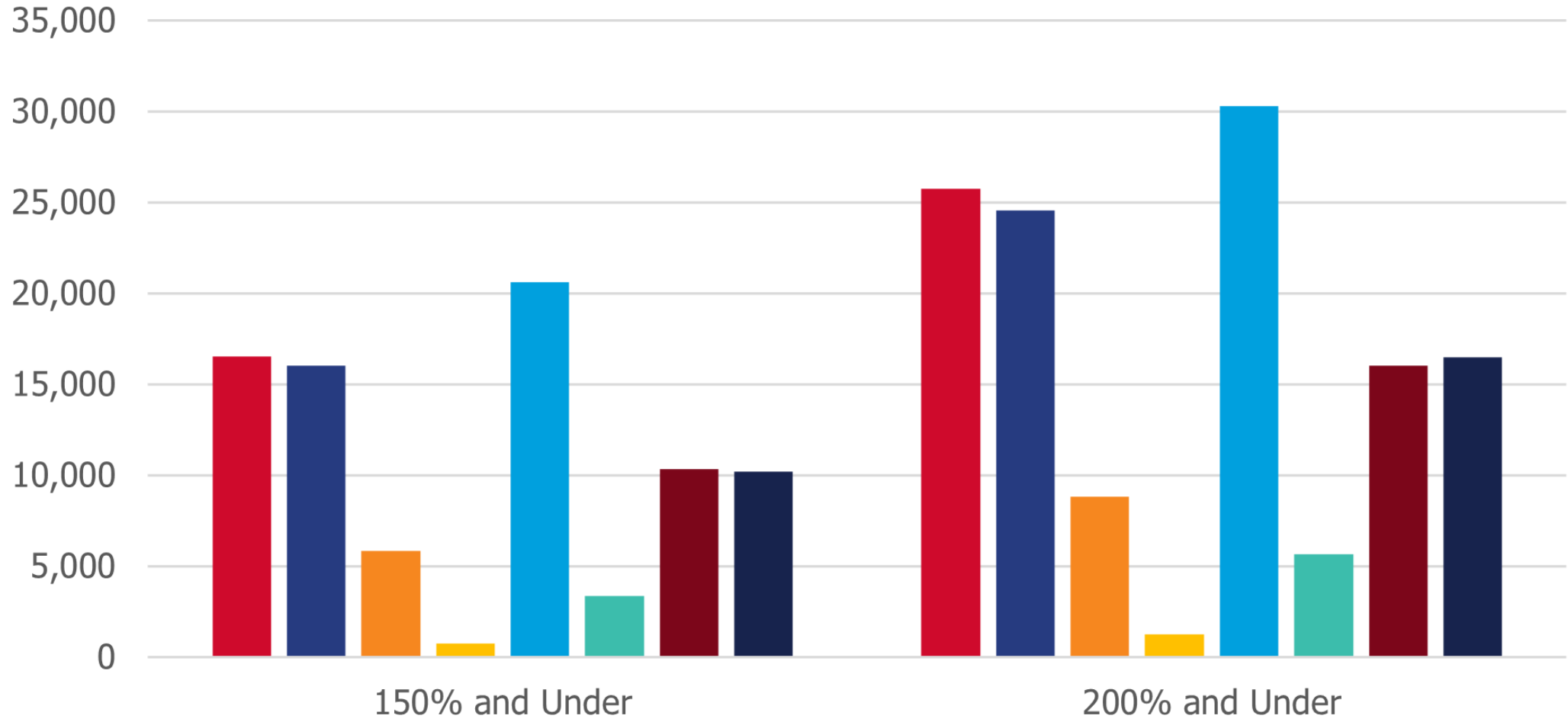
2024 Poverty Guidelines

Household Income Per Year

Household Size	150%	200%
1	\$22,590	\$30,120
2	\$30,660	\$40,880
3	\$38,730	\$51,640
4	\$46,800	\$62,400
5	\$54,870	\$73,160
6	\$62,940	\$83,920

Source: U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation

Number of Low-Income Families in Relation to Low-Income Definition, per County



- Adams County
- Arapahoe County
- Boulder County
- Broomfield County
- Denver County
- Douglas County
- Jefferson County
- Weld County

Questions and Providing Feedback

- **Questions?**
- RTD is proposing to consider households as low-income if they earn 200% or less of the federal poverty level (up from 150%)
- Do you agree or disagree with this proposed policy change? **Take the survey!**





Fare Equity Policy

Clarifying when a fare equity analysis is required

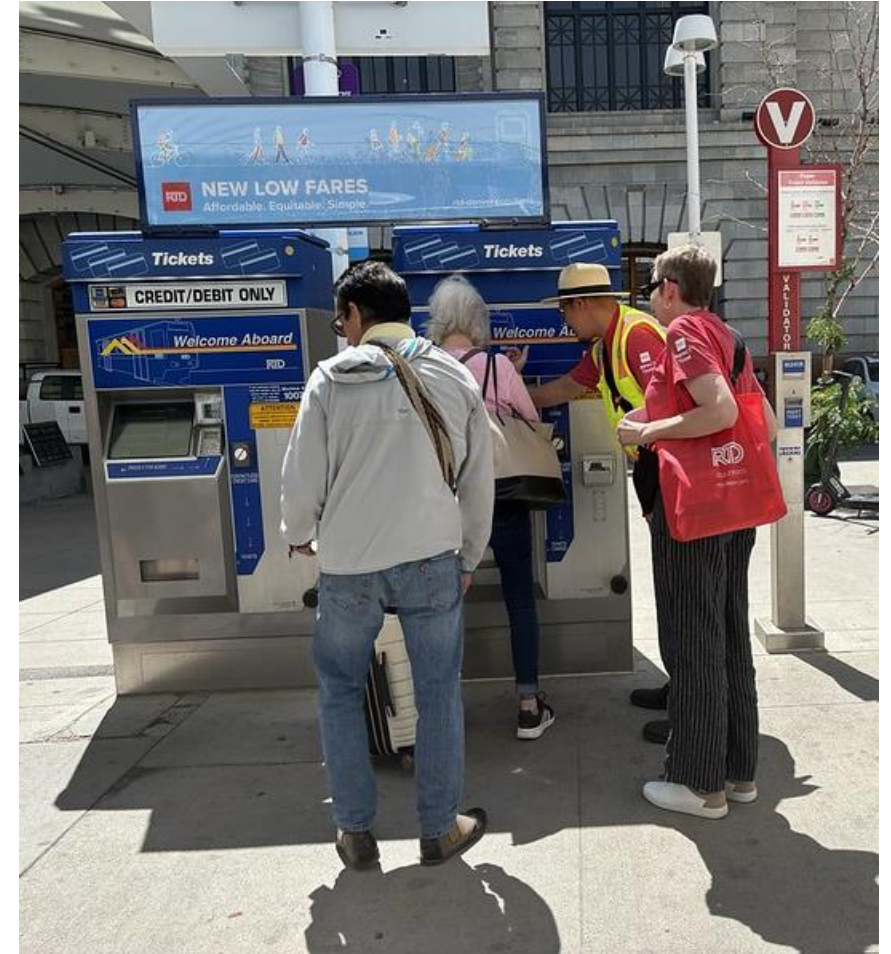
Current Fare Equity Policy

■ Current Policy

- When **fare prices change, or when several fare changes are averaged together**, they should not negatively impact BIPOC or low-income individuals by more than 5% compared to the overall ridership
- Additionally, if **fare payment methods (e.g., passes or electronic payments) are changed or discontinued**, RTD's equity analysis should include how these changes affect access to fare options, such as **vending machines or online payment methods**

Proposed Addition to Fare Equity Policy

- Define "fare change" to include:
 - Any change in fare prices
 - Types of fare media (e.g., cash or electronic payments)
 - Fare products (e.g., day or monthly passes)
 - Different fare levels (e.g., standard or airport pricing)
 - Customer categories (e.g., seniors or youth)
 - Ticket Vending Machine access (e.g., payment options or fees)
- **Goal:** To clarify when a fare equity analysis is required, ensuring that fare changes do not disproportionately affect BIPOC and low-income communities

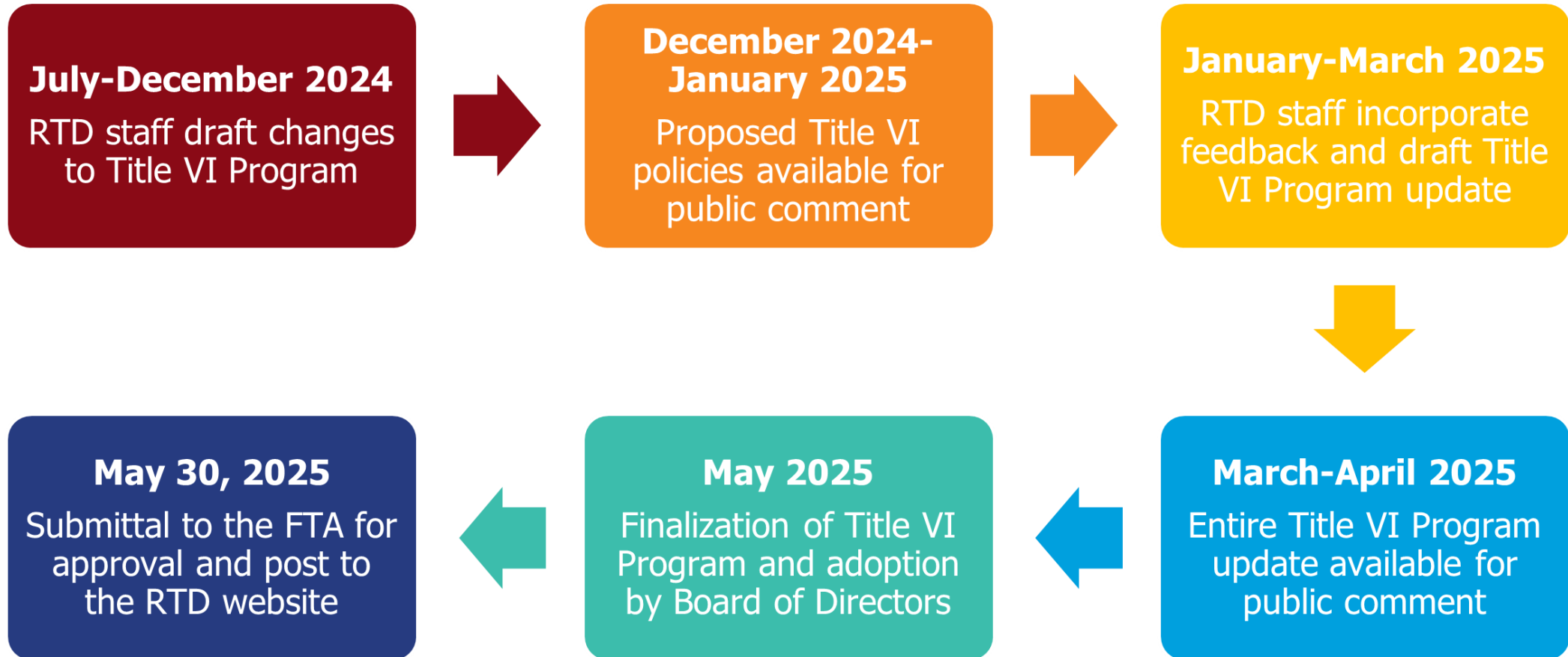


Questions and Providing Feedback

- **Questions?**
- Define “fare change” to clarify when a fare equity analysis is required
- Do you agree or disagree with this proposed policy change? **Take the survey!**



Timeline



We Make Lives Better Through Connections.
