

Draft

2024 – 2027 Title VI Program

Public Comment Period

Rob LaFontaine
Planning Deputy Director

Presented to the Intercity Transit Authority Board on June 19, 2024

Road to Completion

Joint presentation to the CAC/ITA on September 20, 2023

2020 Census: Olympia-Lacey [Urban Area #65242] surpassed 200k in resident population

IT has new requirements to Measure, Monitor, and Analyze service

The **2024 – 2027 Draft Title VI Program**

Heavy refresh of the prior document (2021 – 2024)

Prompts updates to, or creation of, “umbrella” policy documents (i.e. a chain reaction)

Invokes increases in ITA/CAC involvement, and overall public participation

Intercity Transit’s **2024 – 2027 Title VI Program** is due to the FTA by October 1, 2024 (3-year expiration)

June 5 – ITA presentation

June 17 – CAC presentation

June 19 – Request ITA to set a Public Hearing for July 17th

July 17 – Public Hearing, end public comment period

August – Final Adoption, FTA review

Goal #1, Submit by August

Intercity Transit's 2024 – 2027 Title VI Program

TO: The FTA
FROM: Intercity Transit
RE: 2024 – 2027 Title VI Program

- Public Notices
- How to File a Discrimination Complaint
- Listing of Title VI investigations, complaints, or lawsuits
- **IT's Public Participation Plan**
- **IT's Language Assistance Program**
- Authority Board & Community Advisory Committee
- **IT's Subrecipient Compliance**; purchasing contracts
- Adopted Equity Analyses for newly sited Facilities
- **IT's Systemwide Service Standards & Policies**

Goal #2, Receive our Approval

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Goal #3, Develop Umbrella Policies

Intercity Transit's 2024 – 2027 Title VI Program



TO: The FTA
FROM: Intercity Transit
RE: 2024 – 2027 Title VI Program

TO: Our Community
FROM: Intercity Transit
RE: Important Policy Documents

- Public Notices
- How to File a Discrimination Complaint
- Listing of Title VI investigations, complaints, or lawsuits
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- **IT's Systemwide Service Standards & Policies**

- **IT's Public Participation Plan**
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- **IT's Subrecipient Compliance**
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Goal #4, Adopt Umbrella Policies

Intercity Transit's 2024 – 2027 Title VI Program



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RE: Important Policy Documents

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New for 2024

Intercity Transit's 2024 – 2027 Title VI Program

The update of our *Title VI Program* will include important additions, specifically to our Language Assistance Program and Systemwide Service Standards & Policies

a. Contents. Every Title VI Program shall include the following information:

- Public Notices
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Language Assistance Program

Limited English Proficiency (LEP)

The Safe Harbor Provision (USDOJ & USDOT)

Written translation of vital documents for each eligible LEP language group that constitutes five percent or 1,000 persons, whichever is less.



Based on the 2022 American Community Survey (ACS) Intercity Transit intends to ensure language assistance to the following LEP populations:

Language	Population with Limited English Proficiency (2022)	Percentage of Total Population
Spanish	2,783	1.26%
Vietnamese	2,010	0.91%
Korean	1,230	0.56%



Assistance Strategies

- Publicized Translation tools (website, human translator)
- Written Translation of Vital Documents (i.e. Comment & Complaint Forms, Dial-A-Lift Application, surveys, etc.)
- Additional Staff Training

Systemwide Service Standards & Policies

Measure, Monitor, and Analyze

Principal Title VI Purpose

A collection of definitions and processes intended to aid Intercity Transit in making informed, non-discriminatory, decisions regarding the design and operation of public transit service



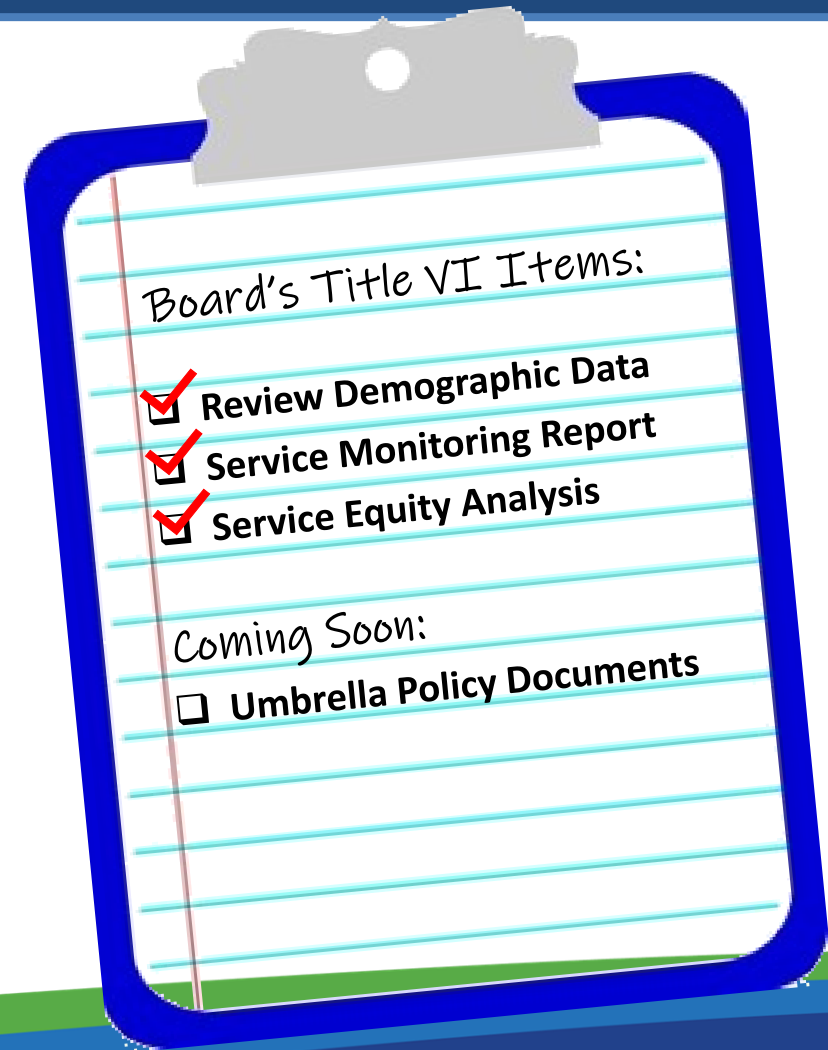
Demographic Data

- Inclusion of Populations, Maps, Charts, and Surveys

Attention Board & CAC Members

The forthcoming Title VI Program reflects the following FTA requirements:

1. Board Adoption of a Service Monitoring Report not less than every 3 years
 - Report to be included in our 2027 – 2030 Title VI Program
 - CAC Review prior to ITA acceptance
2. Board Adoption of a written Service Equity Analysis anytime there is a *major* service change
 - September 2025 – a projected Major service change
 - CAC Review prior to ITA acceptance



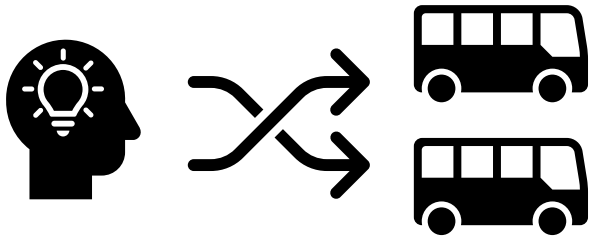
Action Item: Service Equity Analysis

IT's Systemwide Service Standards & Policies

Principal Title VI Purpose

A publicized evaluation to determine any adverse impact (i.e. a measurable action resulting altered access to transit) from a proposed Major change in service that disproportionately affects minority or low-income populations

What about this?



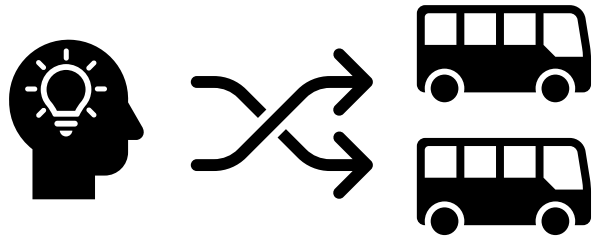
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Is it a Major change?

OOOH...THIS
CALLS FOR A
SPREADSHEET

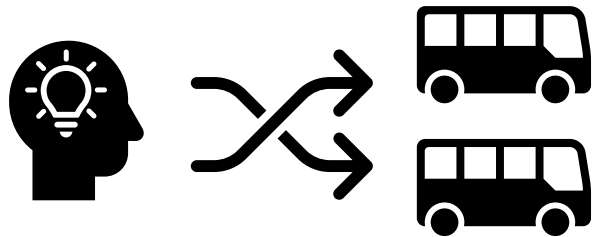
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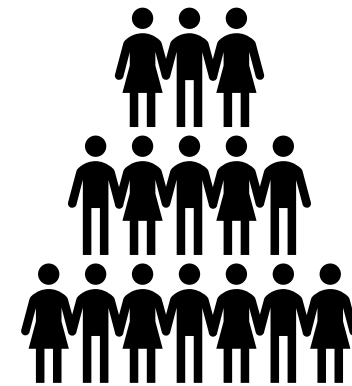
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If yes, prepare a Service Equity
Analysis for the CAC & Board



Action Item: Service Equity Analysis

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A publicized evaluation to determine any adverse impact (i.e. a measurable action resulting altered access to transit) from a proposed Major change in service that disproportionately affects minority or low-income populations

What is a Major change in service? *(updated definitions from last week)*

- A single change that reduces an individual route's revenue hours by 10% or more or increases revenue hours by 50% or more

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What is a Major change in service? *(updated definitions from last week)*

- A single change that reduces the number of consecutive bus stops on an individual route by 3 or more; or increases the number of consecutive stops by 5 or more

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What is a **Major change in service?** *(updated definitions from last week)*

- Removing or substantially relocating a single bus stop that is used by 50 or more passengers per day (combined boardings and alightings)

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- Creation, or discontinuation of a fixed route in entirety

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- Creation, or discontinuation of a fixed route in entirety

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What is significant Disparate/Disproportionate Impact?

The measured share of people in minority populations of race, color, national origin, or low-income are adversely impacted more than the measured share of people in the service area, plus 3%

With all of that said...

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Let's take this show on the road

Intercity Transit's 2024 – 2027 Title VI Program



Requested Action:

Authorize a Public Hearing for the
2024 – 2027 Draft Title VI Program
on Wednesday, July 17, 2024 at 5:30 PM