

Washington Metropolitan Area Transit Authority
Board Action/Information Summary

Action Information

MEAD Number:
202206

Resolution:
 Yes No

TITLE:

2020 Title VI Program Update

PRESENTATION SUMMARY:

Metro's Title VI Program is being updated to meet the requirements of FTA Circular C 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

PURPOSE:

To request Board approval of the 2020 Title VI Program, as required by the FTA Title VI Circular.-

DESCRIPTION:

FTA requires Metro to prepare and submit a Title VI Program update every three years to demonstrate Metro is complying with Title VI requirements. The Title VI Program must meet the requirements outlined in FTA Title VI Circular 4702.1B, effective October 1, 2012. The 2020 Title VI Program Update reports on Metro's activities from January 1, 2017 to June 30, 2020 and must be approved by Metro's Board of Directors prior to submission to FTA.

Key Highlights:

Metro's Board has already reviewed and approved several Title VI components, including service and fare equity analyses completed during the reporting period.

The 2020 Title VI Program update is mainly comprised of updates reflecting new data, documenting progress during the reporting period and enhancements made to existing processes. The following components have been incorporated into the Title VI Program:

- Title VI complaint procedures have been updated to improve handling, resolution, and documentation.
- The Public Participation Plan has been updated including documentation of public engagement activities.
- The LEP Language Assistance Plan including reevaluation of the Four-Factor Analysis with updated demographic data for the service area.
- Review of minority representation on Metro's advisory entities, including the results of

recent recruitment activities.

- Staff has engaged in monitoring and analyzing Metro's service delivery, which showed no discrimination against minority or low-income populations.

Background and History:

Title VI of the Civil Rights Act of 1964 provides that 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.

Under the requirements established in the FTA Title VI Circular, agencies must submit the following elements as part of its program to the FTA:

- Title VI Assurances
- Title VI notices to the public of their rights
- Title VI complaint form and procedures
- List of Title VI investigations, complaints, and lawsuits
- Public Participation Plan and summary of public outreach
- Language Assistance Plan
- Racial composition of non-elected committees and councils
- Description of how the agency monitors its sub-recipients (not applicable to Metro)
- Title VI equity analyses for construction of new facilities
- Board approval of Title VI Program prior to submission to FTA

As a large fixed route transit provider, Metro must also submit:

- Demographic data, service profiles, and rider survey data
- Description of public engagement process to define major service change, disparate impact, and disproportionate burden policies, including Board approval of major service change, disparate impact, and disproportionate burden policies
- Title VI equity analyses of major service changes and fare changes, including Board approval of equity analyses results
- Title VI system-wide service standards and service policies for each fixed route mode

- Service standards for vehicle load, vehicle headway, on time performance, and service availability
- Service policies for transit amenities and vehicle assignment

• Results of monitoring of transit service, including Board approval of monitoring results
Staff from several departments, have been working to update the Title VI Program since 2019. This group reviewed:

- Title VI system-wide service standards and policies – No changes
- Major service change, disparate impact, and disproportionate burden policies – No changes
- Results of monitoring transit service

Discussion:

Metro's 2020 Title VI Program Update addresses numerous requirements, as published in FTA Circular C 4702.1B. Metro's work to comply with each requirement is described

below. Many components in this Title VI Program Update were approved by the Board during this reporting period or in the prior Title VI Update, while others were updated in 2020.

Updates in 2020 Title VI Program

Update of tracking and documenting for Title VI complaints filed against the agency.
Update of recording and reporting of transit-related Title VI investigations, complaints, and lawsuits.

Metro has developed enhanced procedures for investigating and tracking Title VI complaints and Title VI customer complaints. Metro's Title VI complaint form has also been updated and made available on its website. Metro has improved oversight of the investigation of, documentation of, and the resolution of customer complaints.

There has been updating of creation and maintenance of files of customer service complaints implicating discrimination. There have been five formal Title VI complaints investigated and no Title VI lawsuits filed during the review period. Metro's improved documentation includes a list of all customer complaints received since implementation of the enhanced procedures. The list of customer complaints will be submitted as part of the Title VI Program Update, including the status of the complaint, and the findings of the investigations conducted.

Metro uses the information gathered from complaints to examine policies and practices of the organization and implement operational changes as appropriate; to detect misconduct in its earliest stages; to improve the customer service skills of frontline employees; and identify areas that should be emphasized in future training. In addition, Metro's Title VI rights brochure has been made available on-line, disseminated to Community-Based Organizations that serve minority, low-income, and LEP populations and is provided to patrons who lodge a complaint that may be related to Title VI. Additionally, "Take-One" notices in Metrorail stations via fixed durable placards as well as placards on Metrobuses provide contact information to obtain further information concerning complaint procedures.

Update of the collected demographic data analysis for minority groups in the service area and travel patterns

Metro has collected and analyzed socioeconomic data from the U.S. Census Bureau showing the extent to which members of minority groups and low-income persons are beneficiaries of its programs. Based on the 2014-2018 American Community Survey 5-Year, the total population of the service area is 4.2 million people. Minorities represent 60% of the area population, and persons living below the poverty level represent 9%.

Update of Metro's the Four-Factor Analysis to ensure Metro is providing meaningful access for LEP individuals by updating the Language Assistance Plan to address the identified needs of the LEP population.

The Language Assistance Plan provides updated information on the four-factor analysis, illustrated some of the language assistance measures employed by Metro as they were implemented, reported on efforts to implement its 2017 Language Assistance

Plan, and proposed language access initiatives planned for the next three years.

The Language Assistance Plan outlined in that document provides directions and goals for compliance and service regarding limited and non-English proficient population needs. This presupposes a multi-step process, moving into the future, of implementation, assessment of results, continued monitoring of the population and its needs, periodic adjustment based upon assessment of outcomes, and direct engagement and feedback from various involved populations. This is a model not only of compliance, but also of continuous improvement of service and provision of meaningful access to information.

The Language Assistance Plan also highlighted new institutional practices of engagement and communication that were implemented due to adoption of new approaches, or through refining previously instituted processes.

The three-year Language Assistance Plan addresses five major actions: 1) identify LEP individuals in your service area, 2) identify ways to provide assistance, 3) train staff, 4) provide notice to LEP persons, and 5) continuously monitor and update the plan. Metro focused its language services to address the needs of the LEP population in the region, including the following examples:

- Translating vital documents into the top six LEP languages in the region
- Providing a language interpretation line that is available through the Metro Service Call Center and used by various departments that serve customers
- Training frontline staff about Metro's Title VI and language access policies and procedures, cultural sensitivity, assistance available to LEP persons, and Title VI complaint procedures
- Targeting public outreach to areas where LEP populations reside and tend to travel
- Working with Community-Based Organizations (CBOs) that serve LEP, minority, and low-income populations to disseminate multilingual information and obtain feedback on language assistance needs and resources
- Providing translation of information on Metro's website into various languages

Update of the Public Participation Plan (PPP) that outlines strategies to engage minority and LEP populations and other constituencies that are traditionally underserved.

- Provides framework for Metro's communications and outreach activities to ensure equitable outreach, gain community feedback, and inform customers about projects and policies.
- Incorporates changes to communications planning to follow recognized project management processes (PMI)
- Documents 60 projects that have followed the PPP in the previous three years, including 26 projects that incorporated in-person outreach methods

Service monitoring of fixed route transit services to ensure that its service design and operational practices do not result in discrimination to minority and low-income populations.

Metro evaluated the service standards for vehicle load, vehicle headway, and on-time performance at the line level for both Metrorail and Metrobus, using the Disparate Impact/Disproportionate Burden (DI/DB) threshold applicable to the number of impacted riders (i.e., those experiencing service not meeting the standard). Metro evaluated the service availability standard by determining the percentage of minority and low-income persons within walking distance of Metro services compared to the non-minority and non-low-income persons within walking distance.

The results of the 2020 analysis revealed no significant difference in service provided to minority and low-income passengers versus other passengers vis-à-vis the Board-approved standards and policies established for Title VI service monitoring. Metro provides an equitable level of service to all its customers on Metrobus and Metrorail during peak and off-peak service periods. For some service standards, minority and low-income riders tended to experience service that is better than the systemwide average. For cases where more minority and low-income riders experienced service that failed to meet a given standard more than the system-level ridership, the results fell within the DI/DB threshold.

Other Requirements

Provide annual Title VI certifications and assurances to FTA.

Metro's Federal Fiscal Year 2017 FTA Certification and Assurances were executed on March 2, 2017. The Certification and Assurances for FY2018 were executed April 27, 2018 and for FY2019 were executed on May 20, 2019. Metro's General Manager and CEO, Paul Wiedefeld, acted as the Official Certifying Officer for Metro in each instance.

Provide notice to the public regarding the agency's Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

The Title VI notice to the public is provided through several formats and venues, including posting and distributing notice of Title VI rights brochures on its website; disseminating notice of Title VI rights brochures to CBOs that serve low-income, minority, and LEP populations and at public meetings sponsored by Metro; distributing Take-One notices on MetroAccess vehicles and in Metrorail Stations; and notice of Title VI rights displayed as placards inside Metrobuses and available in the headquarters building lobby. Title VI notice brochures and Take-One notices are translated into the top six languages spoken by LEP individuals in the service area: Spanish, Chinese, Korean, Amharic, Vietnamese, and French.

Evaluate service and fare changes to determine whether those changes will have a discriminatory impact on minority and low-income persons.

Metro conducted 13 equity analyses between 2017 and 2020 using policies and procedures consistent with FTA Circular C 4702.1B. Service equity analyses were

completed for each of Metro's state of good operations Metrobus service changes in 2017 and 2019, for four Metro bus service changes and for one Metrorail service change. Equity analyses were completed for service and fare changes as part of the FY2018, FY2020, and FY2021 Operating Budgets. Fare equity analyses were completed for two parking rate changes and for one Metrorail fare change. For each service and fare proposal, staff developed the equity analysis and presented the findings to the Metro Board. The Board approved all the equity analyses conducted during the reporting period.

Provide minority representation on non-elected committees and councils.

The Riders' Advisory Council (RAC) is an all-volunteer group that obtains input from a broad range of riders and advises Metro's Board of Directors on ways to improve the system. The RAC is currently comprised of 11 members. The demographics of the current 11 members on the RAC include Male-64%, Female-36%, Caucasian-45%, African-American-36%, Hispanic-9%, and Asian-9%. Overall, minority representation on the RAC is 55%.

The Accessibility Advisory Committee (AAC) consists of 18 volunteers committed to helping Metro enhance the travel experience of people with disabilities and senior citizens. The AAC membership is diverse to reflect geographical areas, various types of disabilities, race, color, and national origin. The current AAC members include Male-50%, Female-50%, Caucasian-44%, African-American-44%, Hispanic-6%, and Asian-6%. Overall, minority representation on the AAC is 56%.

Complete a Title VI equity analysis when determining the site or location of facilities.

Facilities included, but not limited to, are storage facilities, maintenance facilities, operations centers, etc. Metro has six (6) different projects that are scheduled to be constructed or leased in the upcoming three (3) Federal fiscal years.

Provide Title VI assistance to sub-recipients of Federal financial assistance.

Metro does not pass through FTA funds to any sub-recipients, and is therefore not subject to these requirements.

FUNDING IMPACT:

Metro does not pass through FTA funds to any sub-recipients, and is therefore not subject to requirements regarding sub-recipient compliance with Title VI regulations.	
Project Manager:	Jan M. Bryant
Project Department/Office:	GM/Office of Equal Employment Opportunity

TIMELINE:

Previous Actions	
	09/2020 – Board Approval of Metro's 2020 Title VI Program and

Anticipated actions after presentation	results of 2020 service monitoring under the system-wide service standards and policies 10/2020 – 2020 Title VI Program Submittal to FTA
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RECOMMENDATION:

Executive Committee concurrence and subsequent Board approval of the 2020 Title VI Program and the results of the monitoring.

2020 Title VI Program Update

Executive Committee

Jan M. Bryant, Director - OEEEO
September 10, 2020



Purpose

- Seek Board approval for the 2020 Title VI Program updates and Service Monitoring Results

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.”

--42 U.S.C. 2000d

Metro's Commitment to Title VI

Demonstrates equal access through:

- Rail & bus system-wide service standards & policies
- Policy definitions for equity analysis
 - Major service change, disparate impact (minorities) & disproportionate burden (low-income persons)
- Complaint procedures updated
- Public Participation Plan updated
- LEP Language Assistance Plan updated

Changes in 2020 Program

- No major programmatic changes since 2017
- Updates:
 - Demographic and survey data
 - Language Assistance Plan
 - Monitoring of Metro service
 - Title VI complaint procedures
 - Public Participation Plan

Customer Demographics

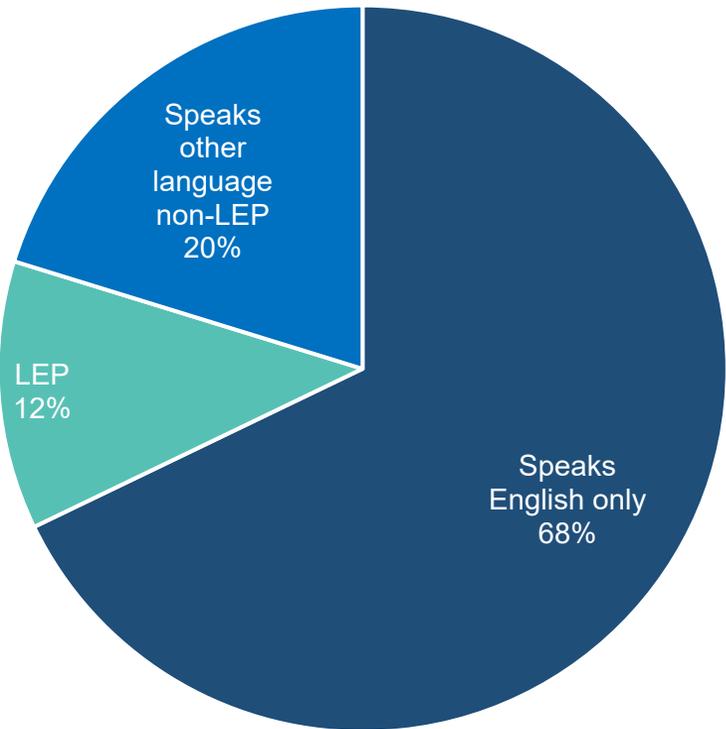
FY 2016	Annual Ridership	% Minority Ridership	% Low-Income Ridership
Rail	191,348,000	45%	13%
Bus	127,432,000	81%	52%
TOTAL	318,718,000		
System Wide Minority and Low-Income Ridership		60%	28%

FY 2019	Annual Ridership	% Minority Ridership	% Low-Income Ridership
Rail	175,255,450	45%	13%
Bus	107,258,752	81%	46%
TOTAL	282,514,202		
System Wide Minority and Low-Income Ridership		58%	25%



Limited English Proficiency (LEP) Language Assistance Plan

Languages Spoken



Total LEP Languages	% Regional LEP Pop.
Spanish	52.3%
Chinese (incl. Mandarin, Cantonese)	7.2%
Korean	6.2%
Vietnamese	4.9%
Amharic, Somali, or other Afro-Asiatic languages	4.5%
French (incl. Cajun)	2.8%
Arabic	2.6%
Persian (incl. Farsi, Dari)	2.2%
Yoruba, Twi, Igbo, or other West African languages	1.6%
Tagalog (incl. Filipino)	1.6%
Urdu	1.3%
Russian	1.2%
Others	10.1%



Limited English Proficient (LEP) Metro Customers By Jurisdiction



Metrorail

Jurisdiction	# Riders Per Day	% LEP
DC	100,073	3%
Maryland	106,316	7%
Montgomery County	59,545	7%
Prince George's County	46,771	6%
Virginia	91,497	6%
Fairfax County	39,682	8%
Arlington County	32,977	4%
City of Alexandria	16,238	6%
City of Falls Church	1,256	3%
City of Fairfax	1,344	7%
Region	298,066	5%

- Spanish (55%)
- Chinese - including Mandarin and Cantonese (7%)
- Amharic, Somali, or other Afro-Asiatic languages (6%)
- Korean (5%)
- Vietnamese (4%)
- French – including Cajun (3%)
- Arabic (2%)
- Other or Not Available (19%)



Metrobus

Jurisdiction	# Riders Per Day	% LEP
DC	86,766	18%
Maryland	51,281	38%
Montgomery County	20,582	42%
Prince George's County	30,699	36%
Virginia	25,538	35%
Fairfax County	10,221	45%
Arlington County	8,688	24%
City of Alexandria	5,330	36%
City of Falls Church	841	15%
City of Fairfax	458	39%
Region	163,583	27%

- Spanish (59%)
- Chinese - including Mandarin and Cantonese (6%)
- Amharic, Somali, or other Afro-Asiatic languages (6%)
- French – including Cajun (4%)
- Korean (3%)
- Vietnamese (3%)
- Arabic (2%)
- Other or Not Available (16%)

Title VI Complaints & Procedures

- Updated complaint procedures
- Between January 1, 2017 to June 30, 2020
no Title VI lawsuits filed and five formal Title VI complaints

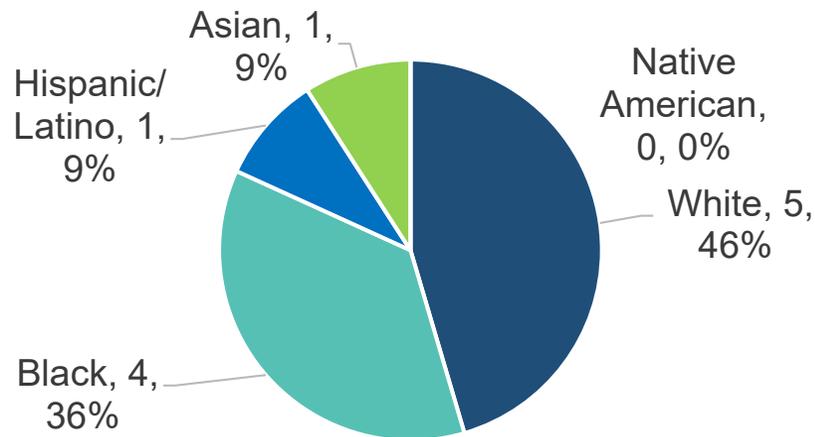


Other Requirements

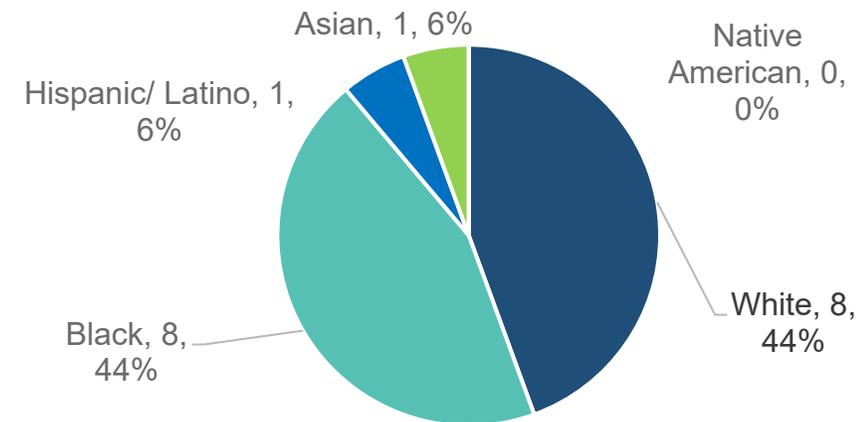
- Annual Title VI Certifications & Assurances
- Minority Representation on Advisory Boards

- Title VI Notices to the Public
- Service & Fare Change Equity Analyses 2017-2020
- Results of Service Monitoring

Riders' Advisory Council:
55% Minority



Accessibility Advisory Committee:
56% Minority



Service Monitoring

- Required to be conducted at least once every 3 years
- Service monitoring, like equity analyses utilizes Board approved bus service standards from 2013 that remained unchanged
- Similarly Board approved rail services standards from 2018 were utilized unchanged
- The results show that no significant difference exists between the service provided to Metro's minority and low-income passengers and the service provided to Metro's non-minority and non-low-income passengers

Bus Service Standards for Monitoring

FTA Standard	Metro Measure	Metro Definition
Vehicle Load	Load Factor	Average ratio of passengers per seat per bus during a service hour at the maximum load point
Vehicle Headway	Time between buses (frequency)	Maximum scheduled time interval between buses
OTP	Schedule adherence	Percent adherence to scheduled service.
Service Availability	Population served by Regional and Non-Regional Metrobus	Percent of a population living near a Metrobus stop

Rail Service Standards for Monitoring

FTA Standard	Metro Measure	Metro Definition
Vehicle Load	Passengers-per-car (PPC)	Average number of passengers in a Metrorail car at maximum load stations
Vehicle Headway	Time between trains (frequency)	Maximum scheduled time interval between trains during normal weekday service
OTP	Rail customer on-time performance	Percent of customer journeys completed on time
Service Availability	Population served by Metrorail	Percent of a population living near a Metrorail station

Disparate Impact/Disproportionate Burden

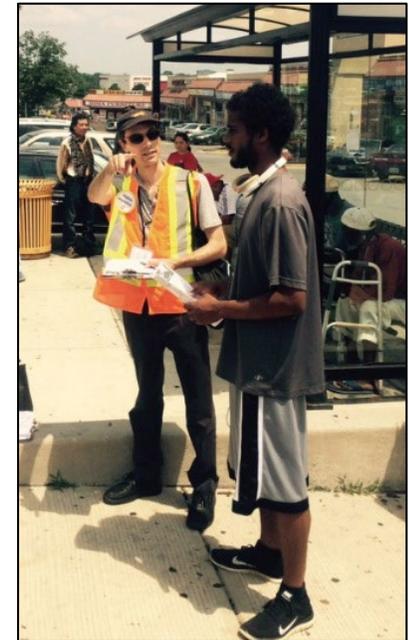
*Total Riders Affected by Service Change (per weekday)	Threshold for Significant Disparity (between % minority/low-income riders affected by service change and % of minority/low-income riders for the system or mode)
Up to 10,000	8%
10,001 to 20,000	7%
20,001 to 40,000	6%
Over 40,000	5%

**Based on natural breaks in Metro passenger survey data*

Exceptions to using the above thresholds may occur if Metro has limited survey data available and the margin of error in the data is 10% or greater. In such cases, Metro will collect new data to ensure a margin of error consistent with this definition.

Inclusive Public Outreach/ Public Participation Plan (PPP)

- Completed over 2,000 public outreach activities from 2017-2020
- Incorporates changes in public communication
- Documents outreach and communication on over 60 projects



Next Steps



- Action items
 - Request Board Approval of the 2020 Title VI Program Update & Approval of the Service Monitoring Results

Title VI Program Appendices



Equity Analysis Requirements

- Major Service Changes in Bus and Rail
- Any Fare Changes (*i.e.*, increase or decrease)

Service & Fare Equity Analyses 2017-2020

- Service and Fare Changes, FY 2018 Operating Budget.
- Service Changes – 2017 Metrobus State of Good Operations
- Service Change, Metrobus NH2
- Service Change, Metrobus G9
- Service Change, Metrobus W9
- Service Change, Metrorail Red Line
- Fare Change, Parking Rates
- Service Change, Metrobus 3T
- Fare Change, Parking Rates
- Fare Change, Metrorail fares
- Service and Fare Changes, FY 2020 Operating Budget
- Service Changes – 2019 Metrobus State of Good Operations
- Service and Fare Changes, FY 2021 Operating Budget

SUBJECT: APPROVAL OF 2020 TITLE VI PROGRAM

RESOLUTION
OF THE
BOARD OF DIRECTORS
OF THE
WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY

WHEREAS, Federal Transit Administration (FTA) Circular 4702.1B requires the Board of Directors to review and approve the Title VI Program and service monitoring results; and

WHEREAS, FTA requires grant recipients, such as WMATA, to submit a Title VI Program every three years; and

WHEREAS, The 2020 Title VI Program updates several program elements, including demographics of the Transit Zone and customers; the Language Assistance Plan; the Public Participation Plan; monitoring of service standards; and Title VI complaints received and investigated; and

WHEREAS, WMATA is committed to ensuring its programs and policies are designed to provide meaningful participation in and equal access to transit services regardless of race, color, or national origin;

NOW, THEREFORE, be it

RESOLVED, That the Board of Directors approves the 2020 Title VI Program, including the service monitoring results in Attachment A to this Resolution; and be it finally

RESOLVED, That in order to comply with the FTA submission deadline, this Resolution shall be effective immediately.

Reviewed as to form and legal sufficiency,

/s/ Patricia Y. Lee

Patricia Y. Lee

Executive Vice President and General Counsel

Attachment A: Service Monitoring Analysis

I. Overview

Staff analysis shows that no significant difference exists between the service provided to Metro’s minority and low-income passengers and the service provided to Metro’s non-minority and non-low-income passengers.

II. Background

The Title VI Circular requires that transit providers ensure that service design and operational practices do not discriminate on the basis of race, color, or national origin. To ensure that such service is non-discriminatory, transit agencies are required to monitor fixed-route service at least once every three years using Board-approved service standards and policies. Although the Title VI Circular only requires that transit agencies compare levels of service between minority and non-minority riders, Metro also evaluates its service for low-income passengers.

Transit agencies must establish four service standards: on-time performance (OTP), vehicle headways, vehicle load, and service availability; and two service policies: distribution of transit amenities and vehicle assignment for each specific fixed route mode of service they provide. The Title VI Circular requires that the monitoring results be reported to the Board for its “consideration, awareness and approval.” Appendix A describes each of the standards and policies used in the monitoring analysis.

To evaluate whether service is equitably delivered across each mode, Metro staff applied its Board-approved¹ disparate impact/disproportionate burden (DI/DB) test for those riders that experienced service that did not meet its Board-established standards or policies. As shown in Table 1, the DI/DB thresholds vary based on the number of average daily riders impacted.

Table 1: Metro’s DI/DB Thresholds

Total Daily Riders Impacted	Threshold for Significant Disparity
Up to 10,000	8%
10,001 to 20,000	7%
20,001 to 40,000	6%
Over 40,000	5%

The DI/DB service test provides the threshold for determining when adverse effects of Metrorail and Metrobus services are borne disproportionately by minority or low-income populations.

¹ Adopted October 24, 2013, Res. 2013-27

If, for example, more than 4,000 off-peak riders experience a load factor that does not meet Metro’s service standards, the DI/DB threshold would be 8 percent, because less than 10,000 riders are impacted. If the variance from the Metrorail system averages for minority and low-income riders was greater than 8 percent, Metro would consider the load standard to have a DI or DB.

III. Title VI Analysis

A. Data Sources and Methods

The monitoring analysis focuses on minority and low-income passenger trips experiencing service that does not meet WMATA’s established standards or policies, comparing the demographic make-up of those customers to that of the total ridership during the same time period.

Metro’s monitoring period corresponds to that of the FTA Triennial period, 2017 to 2019. Staff used the 2016 Metrorail Travel Trends Survey and the 2018 Metrobus Passenger Survey as its primary sources of demographic data. Operating data from fall 2019 was integrated with demographic data to assess the performance data for minority and-low income riders. To evaluate the service availability standard, staff used the American Communities Survey (2014-2018) data.

Service Standards - Load, Headways and OTP

Analysis of the first three service standards—load, headways, and OTP—is based on fall 2019 performance data. Each service standard was evaluated for both Metrorail and Metrobus using the DI/DB threshold applicable to the number of impacted riders (i.e., those experiencing service not meeting the Board-approved standard). Table 2 provides a high-level summary of the standards while Appendix A provides a more detailed summary.

Table 2: Service Standards and Measures

Standard		Measure
Vehicle Load	Rail	100 passengers per car (PPC)
	Bus	1.0 to 1.2 x Seated Load
Vehicle Headways	Rail	4 or 8 Min. Peak
		Varies. Off-Peak
	Bus	15 or 30 Min. Peak
		30 or 60 Min. Off-Peak
OTP	Rail	Expected vs. actual trip time
	Bus	Window: 2 minutes early or 7 minutes late

Metrorail:

Vehicle Load: Vehicle load is measured at 'maximum load' points on each line. Using passenger survey data, staff determined the demographic composition of riders on each line to determine whether minority and low-income riders are significantly more likely to experience crowding.

Vehicle Headways: The analysis focuses on whether minority and low-income riders are significantly more likely to experience scheduled headways that do not meet established standards. To conduct the analysis, staff reviewed the number of trains scheduled per hour to see if the corresponding standard was met.

On-Time Performance: By combining OTP data and rail survey data, staff was able to determine the number of trips that were on-time for minority and low-income customers compared to the system average.

Metrobus:

Vehicle Load: Each Metrobus route has its own maximum load point by time of day. Staff evaluated rider demographics by route/line to determine whether minority and low-income riders are significantly more likely to experience crowding.

Vehicle Headways: The analysis focuses on whether minority and low-income riders are significantly more likely to experience scheduled headways that do not meet established standards. As with rail headways, staff reviewed the number of buses scheduled per hour to see if the headway standard that corresponded to that time period was met. However, staff also took into account the type of line (urban/ suburban), as the standards vary by line category (see Attachment A).

On-Time Performance: Metrobus OTP data is collected for six daily time periods and aggregated into peak and off-peak samples. By combining the OTP data, ridership data, and bus survey data, staff calculated the number the number of minority and low-income passenger who do not experience on-time service and compared these to the system averages.

Service Standards – Service Availability

To assess how accessible Metro's service is for minority and low-income residents, Metro staff used American Community Survey (2014-2018) residency data. Using GIS tools, staff calculated a buffer of a ½ mile around Metrorail stations and a ¼ mile around Metrobus stops. Using the GIS and ACS data, staff calculated the percentage of minority and low-income persons within walking distance of Metro services compared to the non-minority and non-low income population in Metro's service area.

Service Policies – Passenger Amenities, Vehicle Assignment

Metro has set standards for the distribution of passenger amenities through the rail transit network in its station design and planning standards. Metro does not own or operate bus stops except for those located on Metrorail station property. Consistent with the Title VI

Circular, Metro therefore only assessed distribution for those bus stops on Metrorail station property.

Metro's vehicle assignment policies focus on fleet age, and whether minority and low-income riders disproportionately ride on buses or railcars that are significantly older than the system average. The following paragraphs describe the staff analysis for each policy by mode.

Metrorail:

Passenger Amenities: Staff determined that all stations met these requirements. If the amenities were not present, staff would have calculated the demographic make-up of passengers using these stations to determine whether minority and low-income customers were significantly more likely to use stations where amenities were missing.

Vehicle Assignment: By applying operations data detailing train composition by car series on an average weekday², staff calculated an average vehicle age by line. Staff then used passenger survey data collected for each line to determine whether minority or low-income riders were significantly more likely to encounter older vehicles.

Metrobus:

Passenger Amenities: Metro does not own or manage bus stops beyond its rail stations. Metro has, however, set standards for bus bays at rail stations. Bus bays were included in the Metrorail station survey and evaluated with the Metrorail station amenities.

Vehicle Assignment: By applying the average age of the Metrobus fleet by garage to the ridership of the lines served by each garage, staff calculated the average vehicle age per bus line. Staff then used passenger survey data collected for each line to determine whether minority or low-income riders were significantly more likely to encounter older vehicles.

B. Results

Staff analysis shows that for each service standard and policy, Metro provides an equitable level of service to all its customers on Metrobus and Metrorail during peak and off-peak service periods.

Service Standards - Load, Headways and OTP

As shown in Tables 3 and 4, Metrorail and Metrobus service standards do not result in a DI or DB for minority or low-income passengers. In all cases, the percentage of minority and low-income trips not meeting a certain standard did not exceed the DI/DB threshold. In Tables 3 and 4, a negative number in the difference column indicates that minority or low-income passengers experience better service than the system average, as less of them see service that does not meet the guideline.

² ROCS SPOT data, October 2019

Metrorail:

With respect to OTP, minority and low-income customers are somewhat more likely to not experience on-time service than average. However, the differences are well below the threshold for disparate treatment. With respect to vehicle load, minority and low-income customer are less likely to experience load that exceeds guideline.

Three rail service standards—Off-peak vehicle load and peak and off-peak vehicle headway—meet the corresponding service standard criteria. For example, staff reviewed scheduling of trains and determined that Metro adheres to its headway policy. As a result, Metro’s headways do not result in a DI or DB.

Table 3: Metrorail Results – Load, Headways and OTP

Service Standard	DI/ DB Threshold	Difference Minority	Difference Low Income	Pass DI/DB Test
On-Time Performance				
Peak	5.0%	2.1%	0.1%	Yes
Off-Peak	7.0%	0.7%	0.4%	Yes
Vehicle Load				
Peak	5.0%	-1.6%	-1.3%	Yes
Off-Peak	All service meets standard			Yes
Vehicle Headway				
Peak	All service meets standard			Yes
Off-Peak	All service meets standard			Yes

Metrobus:

Staff analyzed the bus service that does not meet Metro’s Board-approved standards to determine whether a DI or DB exists. Table 4 summarizes the underperforming bus service provided to minority and low-income riders compared to the underperforming service provided for all customers.

As shown in Table 4, minority and low-income riders make up a slightly higher proportion of riders who experience service that is not on-time. However, there is no disparate treatment. They are less likely to experience service that exceeds the load guidelines for

that route/ time period. In terms of vehicle headways, low-income customers are less like to experience service that does not meet the guidelines for service during peak and off-peak periods. Minority customers are more likely to experience service that does not meet the guideline during off-peak periods. However, this difference is below the DI threshold, so, there is not disparate treatment.

Table 4: Metrobus Results – Load, Headways and OTP

Service Standard	DI/ DB Threshold	Difference Minority	Difference Low Income	Pass DI/DB Test
On-Time Performance				
Peak	5.0%	1.0%	1.4%	Yes
Off-Peak	6.0%	0.8%	1.1%	Yes
Vehicle Load				
Peak	8.0%	-10.7%	-10.5%	Yes
Off-Peak	8.0%	-4.7%	-7.8%	Yes
Vehicle Headway				
Peak	6.0%	0.1%	-8.2%	Yes
Off-Peak	8.0%	6.6%	-5.5%	Yes

Service Standards – Service Availability

Table 5 shows the differences in service coverage. Unlike Tables 3 and 4, a positive number means more service for minority or low-income customers while a negative number means the less service. Overall service coverage (Metrorail + Metrobus) is generally better for minorities and low-income residents. The only exception is minorities who live within a ½ mile of Metrorail. However, the difference is less than 5 percent.

Table 5: Service Availability Results

	Minority Diff.	Low-Income Diff.
Percent of residents within walking distance of:		
1/2 Mile Metrorail	-4.6%	8.2%
1/4 Mile Metrobus	3.9%	9.2%
Within Either	2.8%	8.7%

Service Policies – Passenger Amenities, Vehicle Assignment

Metrorail:

Passenger Amenities: Staff determined that all stations in the Metrorail system met the established criteria.

Vehicle Assignment: The average age of a rail vehicles across the system is 12.6 years³. For minority and low-income passengers, the average vehicle age is somewhat lower, at 12.4 years and 12.0 years, respectively. This analysis shows an equitable distribution of vehicles throughout the system.

Metrobus:

Passenger Amenities: Not applicable, other than for bus bay shelters at rail stations, which are included in the Metrorail analysis.

Vehicle Assignment: – The average age for a bus across all Metrobus lines is 7.1 years.⁴ For minority and low-income customers, the averages are virtually the same as the system average, 7.2 and 7.3 years respectively. This analysis shows an equitable distribution of vehicles throughout the system.

For the reasons listed above, staff has determined that no significant difference exists between the service provided to Metro’s minority and low-income passengers and the service provided to Metro’s non-minority and non-low-income passengers.

³ Vehicle deployment as of October of 2019, weighed by passenger trip

⁴ Ibid.

Appendix A

Table 1: Rail Service Standards			
FTA Standard ⁵	WMATA Measure	WMATA Definition	WMATA Calculation
Vehicle Load	Passengers-per-car (PPC)	Average number of passengers in a Metrorail car at maximum load stations	Normal (rush and non-rush) weekday minimum of 80 and maximum of 120 passengers-per-car, with an optimal occupancy being 100 passengers-per-car, averaged during a weekday hour at locations in the system where the vehicle passenger loads are the greatest. ⁶
Vehicle Headway	Time between trains (frequency)	Maximum scheduled time interval between trains during normal weekday service	Normal weekday rush period maximums shall be 4 minutes on core interlined segments, and 8 minutes on all other segments; normal weekday midday maximums shall be 6 minutes on core interlined segments, and 12 minutes on all other segments; for the Blue, Orange, Yellow, Green, and Silver Lines the normal weekday late night maximums shall be 10 minutes on core interlined segments, and 20 minutes on all other segments; for the Red Line the normal weekday late night maximum shall be 7.5 minutes on core segments, and 15 minutes on all other segments.
OTP	Rail customer on-time performance	Percent of customer journeys completed on time	Number of journeys completed on time divided by the total number of journeys. These standards vary by line, time of day, and day of week. ⁷
Service Availability	Population served by Metrorail	Percent of a population living near a Metrorail station	Population living within ½ mile of a rail station divided by the total population living in the compact zone.

⁵ As defined in FTA C 4702.1B IV §4a

⁶ As defined in WMATA Board Resolutions 2012-29, 2013-20, and 2017-11

⁷ As defined in Vital Signs Report

Table 2: Rail Service Policies	
FTA Policy ⁸	WMATA Policy
Distribution of Transit Amenities	WMATA will provide amenities such as seating, platform canopies, system maps, information signs, elevators, escalators, and waste receptacles at rail stations across the system.
Vehicle Assignment	Railcars are assigned to a line based on ridership demand, service schedules and maintenance infrastructure restrictions ⁹ .

Table 3: Bus Service Standards			
FTA Standard ¹⁰	WMATA Measure	WMATA Definition	WMATA Calculation
Vehicle Load	Load Factor	Average ratio of passengers per seat per bus during a service hour at the maximum load point	Peak service maximum load factors of 1.2 on radial lines, 1.1 on crosstown and 1.0 on express lines and off-peak service maximum load factors of 1.0 on all service types, averaged during a weekday service hour (peak or non-peak respectively) by line where vehicle passenger loads are the greatest. ⁶
Vehicle Headway	Time between buses (frequency)	Maximum scheduled time interval between buses	Weekday peak-period maximums shall be 15 minutes for Urban and Radial lines, and 30 minutes for Suburban lines; Off-peak and weekend maximums shall be 30 minutes for Urban and Radial lines, and 60 minutes for Suburban lines. ¹¹
OTP	Schedule adherence	Percent adherence to scheduled service.	For delivered trips, difference between scheduled time and actual time arriving at a time point based on a window of no more than 2 minutes early or 7 minutes late. ¹²
Service Availability	Population served by Regional and Non-Regional Metrobus	Percent of a population living near a Metrobus stop	Population living within ¼ mile of a bus stop (regional and non-regional) divided by the total population living in the compact zone.

⁸ As defined in FTA C 4702.1B IV §4b

⁹ Per Metrorail Fleet Management Plan, Revision 4G

¹⁰ As defined in FTA C 4702.1B IV §4a

¹¹ WMATA Board Resolution 2010-39

¹² Definition from Vital Signs Report

Table 4: Bus Service Policies	
FTA Policy ¹³	WMATA Policy
Distribution of Transit Amenities	WMATA will provide amenities such as shelters, system maps, schedules, and waste receptacles at bus stops where WMATA has decision-making authority.
Vehicle Assignment	Vehicles are assigned to routes based on ridership demands, road conditions, service types, maintenance garage capacity and vehicle technologies ¹⁴ .

¹³ As defined in FTA C 4702.1B IV §4b

¹⁴ Board Resolution 2010-39 Attachment A – 2010 Metrobus Fleet Management Plan

Washington Metropolitan Area Transit Authority

Title VI Program Update 2020 Triennial Submittal

October 2020

WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY

2020 TITLE VI PROGRAM UPDATE

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Background and Introduction

Overview and Service Area – Washington Metropolitan Transit Authority

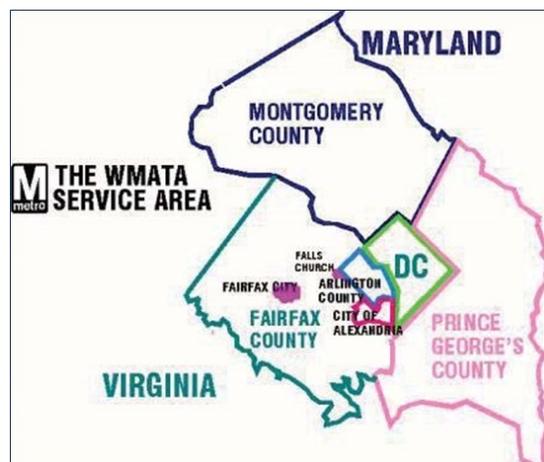
As the fifth largest transit agency in the United States, the Washington Metropolitan Area Transit Authority (WMATA or “Metro”) operates the third largest heavy rail transit system, the sixth largest bus network, and the fifth largest paratransit service in the United States. Safe, clean, and reliable, “America’s Transit System” transports more than a third of the federal government to work and millions of tourists to the landmarks in the Nation’s Capital.

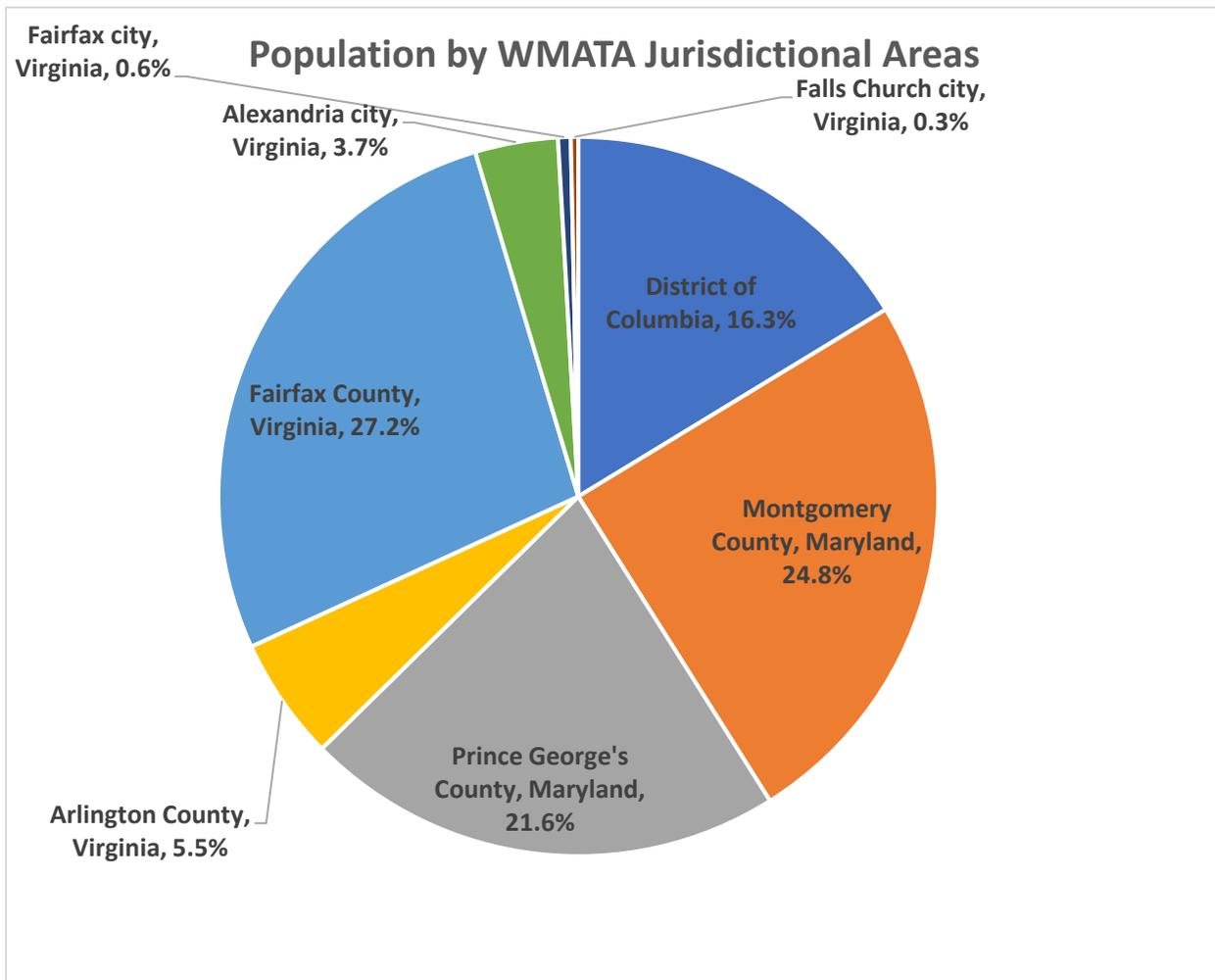
Metro was created in 1967 by an Interstate Compact to plan, develop, build, finance, and operate a balanced regional transportation system in the National Capital area. Compact members consist of eight local jurisdictions: the District of Columbia, the Maryland counties of Montgomery and Prince George’s, the Northern Virginia counties of Arlington and Fairfax, and the cities of Alexandria, Fairfax, and Falls Church. With the completion of the new Silver Line Phase 2 (anticipated 2020), Loudoun County will become the ninth member of the Compact.

Metro began building its rail system in 1969, acquired four area bus systems in 1973 to form Metrobus, and began operating the first phase of Metrorail in 1976. The final leg of the original 103-mile rail network was completed in early 2001. The 2004 additions of the Blue Line extension to Largo and New York Avenue Red Line infill station, along with the 2014 addition of the Silver Line Phase 1, brought the total number of rail stations in service to 91 and total track miles to 118, crossing 6 different rail lines. The Completion of Silver Line Phase 2 will see 6 more Metrorail stations added, for a grand total of 97. Metro began its paratransit service, MetroAccess, in 1994.

Within the 1,500 square-mile Compact area, Metro serves a population of four million. Metrorail operates 7 days per week, opening at 5 a.m. on weekdays, 7 a.m. on Saturdays, and 8 a.m. on Sundays, and closing at 11:30 p.m. Monday to Thursday, 1 a.m. on Friday and Saturday, and 11 p.m. on Sunday. Metrobus serves the Nation’s Capital 24 hours a day, seven days a week with more than 1,600 buses, serving 10,687 stops. MetroAccess hours complement fixed-route service hours. In FY2019 Metrorail carried over 175 million trips; Metrobus carried about 107 million trips; and MetroAccess carried about 2.3 million trips. Metro accounted for more than 301 million trips in FY2019 and moves four times more people annually than Baltimore-Washington Airport (BWI), Ronald Reagan-Washington National Airport (DCA), and Washington Dulles International Airport (IAD) combined.

Metro Service Area





Metro's service area contains a diverse population. Based on the 2014-2018 American Community Survey, the total population of the service area is 4.2 million people, of which 60% are minorities and 9% are living in poverty (as defined by the poverty threshold set by the U.S. Department of Health and Human Services). Based on Metro rider survey data from a 2016 Rail survey, and a 2018 Bus survey, 81% of weekday MetroBus riders, and 42% of weekday MetroRail riders are minorities; while 46% of weekday MetroBus riders, and 9% of weekday MetroRail riders are considered low income.

Thirty-two percent of the region's population speaks a language other than English at home; 32% percent of which speak English less than "very well," based on the 2014-2018 American Community Survey for populations 5 years of age and older. The survey also indicates that 12% of the region's population speak English less than "very well" and would be considered as having Limited English Proficiency (LEP). Many languages are spoken in the region, with the main foreign languages including Spanish, Chinese, Korean, Vietnamese, French, and African Languages such as Amharic.

Metro's most obvious benefit to the region is providing mobility to area residents who need to travel. Metrorail, Metrobus and MetroAccess paratransit services carried more than 427 million passenger trips in the last year alone. Metro is the mode of choice to major special events

including the National Cherry Blossom Festival, July 4th ceremonies, sports events, concerts, parades, festivals and historic celebrations such as presidential inaugurations.

Metro's Title VI Update

Metro has integrated Title VI and the related requirements of Environmental Justice (EJ) and LEP into all aspects of its service planning and delivery since 2006, when it took an objective look at how it had been complying with the applicable requirements. Metro proceeded to develop a methodology and implementation plan to assure compliance with all related requirements and, since that time, has considered and implemented innovative and alternative approaches to both meet the requirements and incorporate the requirements into day-to-day decision-making to better serve the needs of Metro's diverse service area. For the period of the plan, this largely remained Metro's approach, however, with the introduction of the COVID-19 pandemic, Metro was forced to reconsider its approach and utilize alternative means to ensure its ability to meet the diverse needs of the service area. While considering this submission, Metro wishes to reiterate that Metro does not have subrecipients, and Metro does not receive operational or planning assistance for transit management/operations contractors.

I. Annual Title VI Certification and Assurance

Metro's Title VI Assurance

Metro submits its annual Title VI certification and assurance as part of its Annual Certifications and Assurances submission to FTA in the web-based TrAMS Grants Management System. Metro's Federal Fiscal Year 2017 FTA Certification and Assurances were executed on March 2, 2017. FY2018's Certification and Assurances were executed April 27, 2018, FY2019 were executed on May 20, 2019, and FY2020 were executed on May 1, 2020. Metro's General Manager and CEO, Paul Wiedefeld, acted as the Official Certifying Officer for Metro in each instance.

II. Notice to Beneficiaries of Protection under Title VI

Metro's Notice to Beneficiaries

Metro provides information to the public regarding its Title VI obligations and appraises members of the public of the protections against discrimination afforded to them by Title VI. Metro disseminates this information to the public through postings on its website and frequent distribution of the Title VI notice brochures both electronically and as paper copies.

Metro communicates and engages with Community-Based Organizations (CBOs) to identify specific language access needs and systematically informs identified linguistic minorities served by these organizations. Metro maintains communication and proactive engagement with key stakeholders and CBOs through tailored messages, and in-person site visits if additional printed information is requested. Metro also disseminates its notice of Title VI rights brochures to CBOs that serve low income, minority, and limited English proficient populations. These notices are in turn distributed by these partners at their various outreach, meetings, and other activities.

In addition to the Title VI notice brochures, Metro has created permanent plaques that are displayed at each station manager kiosk throughout the rail system. Given that distribution of the "Take-One" notices is less effective on Metrobus, Metro has similarly posted Title VI notices as placards on the inside and on the left outside, by the front door, of all Metrobuses.

Title VI notice brochures and paper copies of “Take-One” are translated into the top six languages (Spanish, Chinese, Korean, Amharic, French, and Vietnamese) spoken by LEP individuals in the service area. Metro has also translated Title VI brochures in Arabic Tagalog, Persian, and Urdu, which fall within the Safe Harbor Threshold of 1,000 individuals or 5%, whichever is less. To ensure that LEP/NEP (non-English proficient) individuals have meaningful access to WMATA’s transit related programs and activities, the Authority translates vital documents into other languages upon request. A representative sample of translated copies of the Title VI notice brochure, and an image of the permanent plaques placed at the Station Managers’ kiosks throughout the Metrorail system are included in **Appendix A**.

III. Title VI Complaint Procedures and Training

Metro’s Complaint Procedures

Metro has developed procedures for investigating and tracking Title VI complaints. The Complaint Policy and Procedures are presented in Appendix B of this submission. This information has been provided directly to the public on Metro’s Public website. The Metro Title VI Complaint Form is also attached in **Appendix B**. The Complaint Form is currently available in nine languages and is accessible to the public through a variety of media, including on Metro’s website, and via telephonic and electronic requests.

The procedures for filing a complaint have been made available to members of the public via posting on Metro’s website. Additionally, Metro has developed a brochure to provide detailed description of the complaint process which is available in thirteen different languages. This brochure is available on Metro’s public website, as well as at stations throughout the system. A copy has been attached in **Appendix B**.

Additionally, Metro has utilized smaller and more succinct notices, “Take-One” notices, that are placed on MetroAccess vehicles. and are provided online, via Metro’s website, to advise beneficiaries of their right to file a Title VI complaint and provide contact details so further information can be obtained concerning complaint procedures. This is in addition to permanent plaques placed at Station Manager’s Kiosks on the rail side, and as placards placed on Metrobuses. This information is also included on MetroAccess vehicles as a seat drop.

Metro’s Office of Equal Employment Opportunity (OEEO) meets periodically with management and staff responsible for customer services for riders of MetroBus, MetroRail, and MetroAccess. The purpose of these meetings is to confirm how service-related complaints are handled and to explain Metro’s commitment to ensuring nondiscrimination in accordance with the provisions of Title VI of the Civil Rights Act, as amended. Additionally, when necessary Metro’s OEEO staff will go out and provide education and reinstruction for employees to ensure the requirements of Title VI are carried through by all employees. Metro’s OEEO staff also works closely with management and staff to ensure that Title VI complaints are investigated, and staff is subject to corrective action, when appropriate, and to counsel employees to ensure that the mission of Title VI is carried out.

To better meet its obligations, Metro has also trained its Customer Service Representatives to ensure they understand the protections afforded to customers under Title VI. The training materials used for these sessions has been included in **Appendix C**. These employees have been trained to identify possible Title VI issues within customer complaints and to include Metro’s OEEO staff on these reports so they can be reviewed by the appropriate staff and investigated and addressed appropriately. The process has been included in **Appendix B**.

IV. List of Title VI Investigations, Complaints & Lawsuits

Metro maintains a list of all customer complaints that have identified race, color, or national origin as the basis of the complaint. During the reporting period (January 1, 2017-June 30, 2020), Metro reviewed numerous complaints that indicated a possible Title VI basis. Of those complaints implicating Title VI bases, 1 implicated color; 32 implicated national origin; and 109 implicated race. A summary list of these investigations has been provided in **Appendix D**, including the status of the complaint, and the findings of these investigations.

During FY2017, and FY 2018, Metro experienced staffing and organizational challenges in Metro's OEEO. With the advent of a new Director, it was discovered that there were significant oversights in the handling of Title VI complaints. Since October 2018, Metro's OEEO staff have been reviewing and consulting on all identified issues that implicate Title VI concerns. The monitoring of possible Title VI issues allows Metro to review policies and procedures, as well as identify any areas of concern, so operational changes can be made, as deemed appropriate. This also allows Metro to detect misconduct at its earliest stages; to improve the customer service skills of frontline employees, and to identify areas that should be emphasized in future trainings. This also permits Metro to identify issues that contribute to customer retention by addressing concerns and taking steps to alleviate similar concerns.

In FY2019, Metro received five (5) formal Title VI complaints. During the three-year period of the plan, Metro had no Title VI lawsuits. Metro's OEEO has continued with oversight of the accelerated review of complaints and Metro will continue to provide Title VI, language assistance, and cultural sensitivity training as needed.

V. Promoting Inclusive Public Participation/Summary of Public Outreach

Metro's Public Outreach to Minorities, Low Income Individuals, and Persons with Limited English Proficiency

Metro has sought to ensure meaningful access to programs and activities for minority groups, low income individuals, and persons with limited and no-English proficiency by developing comprehensive interdepartmental initiatives aimed at engaging and recruiting members of these communities' participation related to service and fare adjustments, enhancements, or changes. Beyond merely translating information into various languages, Metro has implemented a coordinated and specialized approach by several departments to reach out to limited and non-English proficient persons to ensure that information is effectively communicated and that input and participation is received at representative levels. Since Metro's inception of its Public Participation Plan (PPP), Metro has worked to become a leader in transit public participation practices. Many of the projects and policies that Metro has advanced since the implementation of the PPP have benefited from the feedback received from diverse members of the public.

VI. Public Participation Plan

Metro continues to conduct strong, inclusive public engagement and communication activities, following the guidelines set forth in its Public Participation Plan. This plan showcases Metro's commitment to public participation by serving as a guiding tool to guarantee customers and community members receive relevant high-quality information, communication, and feedback opportunities around planned projects (those that trigger compliance of the PPP) and to fulfill federal obligations. From 2017 through 2020, Metro conducted more than 2,000 public

participation activities including pop-up events, community-based organizations (CBO) visits, surveys, open houses, ride-ons, and other engagement tactics; these events also incorporated strategies to engage limited and non-English proficient customers. Metro's Public Participation team directly managed the communications and outreach for more than 60 projects between January 2018 through March 2020.

Community Based Organization engagement has continued to be an integral part of planned projects' communication plans. These partnerships, and interactions, coordinated by the Office of Equal Employment Opportunity, have provided valuable insight into Public Participation Plan's project decisions, and Metro's engagement and collaboration with community partners have become key in large scale engagement efforts such as the Washington Area Bus Transformation Project, 2018 - 2019, Blue/Orange/Silver Line Capacity and Reliability Study, 2019 – present, and Late-Night and Early-Morning Mobility Metro Study, 2019 – present. CBOs have also participated and provided feedback on other proposed projects including bus route studies, the Bladensburg Bus Garage Reconstruction Project, the Pennsy Drive Heavy Repair and Overhaul Facility, as well as other smaller scale pilot projects including the elimination of cash on certain limited stop bus routes; routine station and entrance closures; and service, fare, and parking changes.

Metro utilizes an on-call outreach contract that provides public engagement support for various projects. The contract provides the flexibility to build professional teams of individuals based on the needs of the project, which may require specialized outreach based on gender, race, ethnicity, and languages spoken. Language needs include, but are not limited to, Amharic, Chinese, French, Korean, Spanish, Vietnamese, or American Sign Language (ASL). All outreach teams are also trained to call Metro's Office of Customer Information to get connected to the on-call language assistance line when needed. Metro has continued to follow the Language Assistance Plan in all planned project communication strategies and has implemented its recommended best practices and processes to support these efforts.

Metro first developed their Public Participation Plan (PPP) in 2013, and it was adopted by the Metro Board of Directors in 2014. The 2020 edition has been updated to reflect the evolution in public communication and outreach since the PPP's initial adoption, and includes new direction from management, successes and lessons learned, as well as changes in the organizational structure. For this reporting period, Metro had a significant increase in project and policy initiatives over the last three years, especially around capital work, construction, service and fares. The 2020-2023 PPP has been included as **Appendix E**.

VII. Metro's 2020 – 2023 Language Assistance Plan

Metro has a responsibility not only to federal regulations pertaining to non-discrimination, but also to serve its clientele, many of whom are not proficient in English, yet require vital information to navigate public transit. It is therefore necessary for Metro to be prepared to serve this population. The plan for accomplishing this is based upon a careful analysis of demographics, and utilization of Metro riders' survey information on the population's needs in the tri-jurisdictional area.

The Language Assistance Plan provides updated information on the four-factor analysis, illustrated some of the language assistance measures employed by Metro as they were implemented, reported on efforts to implement its 2017 Language Assistance Plan, and proposed language access initiatives planned for the next three years.

The Language Assistance Plan outlined in that document provides directions and goals for compliance and service regarding limited and non-English proficient population needs. This

presupposes a multi-step process, moving into the future, of implementation, assessment of results, continued monitoring of the population and its needs, periodic adjustment based upon assessment of outcomes, and direct engagement and feedback from various involved populations. This is a model not only of compliance, but also of continuous improvement of service and provision of meaningful access to information.

The Language Assistance Plan also highlighted new institutional practices of engagement and communication that were implemented due to adoption of new approaches, or through refining previously instituted processes.

This plan is developed to fulfill the requirements of the FTA Circular 4702.1B and the US DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons ("DOT LEP Guidance"). Metro first created its Title VI compliant Language Assistance Plan (LAP) in October 2007, which was approved by the FTA on November 3, 2007. Metro's 2011 LAP update was approved by the FTA on January 27, 2012, later the 2014 update was approved on February 2, 2015, and the 2017 update was approved by FTA on December 9, 2019. Metro's 2020 – 2023 Language Assistance Plan is included as **Appendix F**.

VIII. Minority Representation on Advisory Boards

Metro Advisory Boards

Metro has two advisory committees for which it recruits and selects members to represent Metro riders: Riders' Advisory Council (RAC) and the Accessibility Advisory Committee (AAC).

The RAC advises the Board on issues affecting Metrobus, Metrorail, and MetroAccess service. Throughout 2018, the Board conducted an operational review of the RAC and in November 2018, the Board of Directors approved new Bylaws for the RAC. These new Bylaws revised its membership requirements to tie them less strictly to geographic considerations to provide the Board with greater latitude to appoint members that represent the diversity of Metro's riders. The RAC previously consisted of 21 members, 18 appointed by jurisdiction of residence, two appointed at-large and the head of the Accessibility Advisory Committee. The RAC now consists of 11 members, six appointed by jurisdiction of residence (two each from the District of Columbia, Maryland and Virginia), four appointed at-large, and a representative from the AAC.

The AAC consists of 20 volunteers committed to helping Metro enhance the travel experience of people with disabilities and senior citizens on Metrobus, Metrorail, and MetroAccess. There are currently two vacancies on the AAC. The AAC includes 18 members with disabilities, representing jurisdictions and representatives from the Access for All Committee at the Council of Governments/Transportation Planning Board. The AAC reports to Metro's Board of Directors. The membership of the AAC is diverse to reflect geographical areas and various types of disabilities.

Metro recruits members of the RAC and AAC in a number of ways: advertising openings on the website, issuing press releases when members are being sought, placing flyers on buses and signs at targeted Metro stations, and sending emails to the agency's listservs and community-based organizations. Prospective applicants to the RAC apply for a position by completing and submitting an online application form or, if they prefer, they can print, complete, and mail a paper application.

RAC applications are reviewed on a 100-point scale to provide a list of finalists for further interviews with Metro staff or member of the Metro Board of Directors. The evaluation criteria include, among other criteria: 1) jurisdiction of residence, 2) participation in community groups, 3) if an individual is low-income (household income under \$30,000 annually), and 4) balancing riders on different modes (bus, rail, paratransit). While minority representation is not a specific consideration, Metro takes special care to recruit minorities to serve on the RAC.

Composition

The composition of the RAC and the AAC (as of July 2020) is presented in the following table.

Committee/Council	Number of					Percent Minority
	White	Black	Hispanic / Latino	Asian	Native American	
Riders' Advisory Council (RAC)	5	4	1	1	0	55%
Accessibility Advisory Committee (AAC)	8	8	1	1	0	56%

The RAC membership has 7 males (64%) and 4 females (36%). The RAC membership is diverse as to race with 45% Caucasian, 36% Black, 9% Asian, and 9% Hispanic. Overall minorities represent 55% of the RAC membership. The AAC membership is diverse to reflect geographical areas, various types of disabilities, race, color, and national origin. The AAC has 9 males (50%) and 9 females (50%). The entire group consists of senior citizens and/or people with disabilities who identify as White-44%, Black-44%, Hispanic-6%, and Asian-6%. Overall, minorities represent 55% of the AAC membership.

Recruitment

Metro has a long history of proactive efforts to involve minorities in decision-making processes. Metro recruits members of the RAC and AAC in a number of ways: advertise openings on the website, issue press releases when members are being sought, place flyers on buses and signs at selected Metro stations, and send email blasts to the agency's listservs. AAC is currently actively seeking to fill the two vacancies. Metro has used a recruitment table at monthly AAC meetings, and AAC members conduct outreach. AAC applications are submitted online or through Metro's Department of Access Services.

For the 2017 RAC recruitment drive, Metro also advertised openings through social media, newspapers, CBOs, and word of mouth through current members. Metro did not conduct recruitment for the RAC in 2018. The 2019 recruitment process was delayed. Metro conducted its most recent recruitment for the RAC in July 2020. Due to the ongoing COVID-19 pandemic, the recruitment outreach focused on electronic channels, including targeted social media postings and emails to community-based organizations. Approximately 80 individuals' applications were reviewed as part of the recruitment process, with interviews conducted of top-tier candidates. The Board appointed candidates on July 23, 2020. Metro will again conduct recruitment for the RAC in the fall of 2020 for Board appointment in December 2020.

IX. Determination of Site or Location of Facilities

Metro has six (6) different projects that are scheduled to be constructed or leased in the upcoming three (3) Federal fiscal years. These projects are:

- Dulles (Rail) – Reston, VA (Owner: Metropolitan Washington Airports Authority)
- Potomac Yards (Rail) – Alexandria, VA (Owner: City of Alexandria)
- Heavy Repair and Overhaul Shop – Landover, MD (Owner: WMATA)
- Purple Line (Light Rail) – New Carrollton and Silver Spring, MD (Owner: Maryland Transit Authority)
- Bladensburg Bus Garage – Washington, DC (Owner: WMATA)
- Northern Bus Garage – Washington, DC (Owner: WMATA)

The equity and environment analyses for these projects have been attached here in **Appendix G**.

It is worth noting that the Metro OEEO staff responsible for Title VI compliance also works on environmental justice. Meaningful public engagement with minorities and low-income individuals is important for both Title VI analyses of planned facilities and environmental justice analyses of joint development projects. Metro is aware that gentrification and potential displacement of these populations is occurring in the service area and will examine these issues when expanding existing facilities or building new facilities.

X. Demographic Analysis of Service Area and Customers

Metro's Demographic Analysis

Census and Place of Residence Data

Metro, the regional transit agency for the Washington, D.C. metropolitan area, is an interstate compact agency created in 1967 by the District of Columbia, the State of Maryland and the Commonwealth of Virginia. Metro's transit service area includes:

- Washington, D.C.
- Montgomery County (MD)
- Prince George's County (MD)
- City of Alexandria (VA)
- City of Fairfax (VA)
- City of Falls Church (VA)
- Arlington County (VA)
- Fairfax County (VA)

Metro owns and operates both rail and bus service in these compact jurisdictions with some jurisdictions that also operate supplementary local bus service. Metro is governed by a Board of Directors comprised of eight voting and eight alternate directors. Maryland, the District of Columbia, Virginia, and the federal government appoint two voting and two alternate directors each. **Appendix H**

In Fiscal Year 2019, Metrorail provided 175 million passenger trips and Metrobus provided 107 million passenger trips.

Compact Area Demographics

Based on the 2014-2018 American Community Survey the 1,944-square-mile Metro compact area is home to 4.2 million people, of which 60.4 % are minorities and 8.8% are living in poverty.*

**Metro's service area profile uses the household poverty thresholds set by the U.S. Department of Health and Human Services. WMATA's ridership profile defines a low-income household as one that earns \$30,000 or less as an annual household income. The market research conducted to identify low-income bus routes, bus transfer centers, Metrorail stations, and neighborhoods used \$30,000 as a low-income threshold.*

These populations are not distributed equally throughout the region.

	District of Columbia	Maryland (Compact areas)	Virginia (Compact areas)
High Minority Areas	<ul style="list-style-type: none"> Northeast quadrant Northwest quadrant east of 16th Street NW Southeast quadrant Eastern and southern portions of Southwest quadrant 	<ul style="list-style-type: none"> Northern Silver Spring Wheaton/Glenmont Aspen Hill White Oak Rockville Gaithersburg Germantown Prince George's County 	<ul style="list-style-type: none"> Herndon Chantilly Lorton Bailey's Crossroads Centreville Annandale Springfield Hybla Valley
High Low-Income Areas	<ul style="list-style-type: none"> Northeast quadrant Northwest quadrant east of 16th Street NW Southeast quadrant Eastern and southern portions of Southwest quadrant 	<ul style="list-style-type: none"> Eastern Montgomery County Gaithersburg Germantown Prince George's County inside the Beltway 	<ul style="list-style-type: none"> Herndon Chantilly Lorton Bailey's Crossroads Centreville Annandale Springfield Hybla Valley

Compact Area Limited English Proficient (LEP) Populations

Based on the 2014-2018 American Community Survey, 12% of the WMATA compact area population over five years old has limited English proficiency.

	District of Columbia	Maryland (Compact areas)	Virginia (Compact areas)
High LEP Areas	<ul style="list-style-type: none"> • Columbia Heights • Upper 16th St NW • Fort Totten 	<ul style="list-style-type: none"> • Silver Spring • Wheaton-Glenmont • Aspen Hill • Rockville • Gaithersburg • Germantown • Takoma Park • Langley Park • Hyattsville • East Riverdale • Glassmanor 	<ul style="list-style-type: none"> • South Arlington • City of Alexandria, west end • Central Fairfax County • Hybla Valley • Annandale • Vienna • Reston • Herndon

Thorough analysis was done in 2020 using the 2014-2018 American Community Survey by the Office of Planning on the LEP populations around Metrorail stations (block groups within 1/2-mile radius) and along Metrobus routes (block groups within 1/4-mile radius). Metro staff uses this information when planning service and fare changes and associated public engagement activities.

Passenger Survey Data

Metro's ridership and demographics vary by mode. The 2016 Metrorail Passenger Survey and the 2018 Metrobus Passenger Survey collected information on the minority and low-income status of Metro's ridership. The table below provides a systemwide demographic profile:

Mode	Annual Ridership (FY19)	% Minority Ridership	% Low-Income Ridership	Annual Minority Trips	Annual Low-Income Trips
Rail	175,255,450	45%	13%	78,576,706	22,024,958
Bus	107,258,752	81%	46%	86,558,458	49,764,796
TOTAL	282,514,202			165,135,164	71,789,754
		Systemwide Low-Income	Minority and Ridership	58%	25%

When compared to the demographics of the service area (Census data), the share of Metro riders that is minority is comparable, but the share of Metro riders that is low-income is notably higher.

Appendix I

Metrorail Ridership Profile

The following information was collected from the 2016 rail passenger survey: 94% of AM peak trips and 72% of midday trips are work trips; 24% of riders do not own cars; 32% are federal employees.

Metrobus Ridership Profile

The following information was collected from the 2018 bus passenger survey: 72% of Metrobus riders use the service to get to or from work; 58% reported zero vehicles at home; and 14% are federal employees.

Fare Media Demographics

The next summarizes the weekday fare usage by fare type in fall, 2019.

	Passengers	Minority	Low-Income
Metrobus			
Cash and SmarTrip Boardings	213,300	80%	46%
Passes Total	42,700	86%	50%
Weekly Passes	36,100	92%	56%
Other Passes	6,600	52%	17%
Others (Students, ADA, Employees, etc.)	112,000	varies	varies
Total	368,000	81%	46%
Metrorail			
SmartTrip Distanced Based Fares	583,100	42%	9%
Passes Total	44,800	42%	13%
Monthly Pass	29,200	38%	8%
Transit Link Card	2,500	35%	4%
Other Passes	13,100	52%	25%
Others (Students, ADA, Employees, etc.)	41,600	varies	varies
	669,400	42%	9%

XI. System-Wide Service Standards and Policies

Metro uses the standard FTA service standards and policies, and use of these standards provides for Metro to meet another Title VI requirement – to monitor transit service to ensure that its service design and operational practices do not result in discrimination on the basis of race, color, or national origin.

Metro first developed these Title VI service standards and policies in 2013 through several efforts:

- Review of existing standards and policies, available data, and monitoring tools
- Review of examples from peer multi-modal, multi-jurisdictional agencies
- Input from cross-departmental working group including review of proposed standards
- Development of a memorandum and presentation to inform the Board of the Title VI requirements including the proposed standards and policies.

In 2017 Metro's Title VI Working Group reviewed the Title VI service standards and policies. The main updates were to the Metrorail headway standard to reflect the Board approved service changes for the FY2018 budget (which took effect in June 2017), and to the Metrorail on-time performance standard to reflect a new data collection approach, adopted in 2017 to focus on customer travel time. These service standards and policies for rail and bus are included in Tables 1 and 2, and were used to conduct Metro's monitoring. The standards utilized for MetroBus and

MetroRail have been included in **Appendix I**. It should also be noted that these standards are currently being reviewed for updating and amendment to better serve the riding public.

XII. Monitoring Procedures and Results

Metro Monitoring Procedures

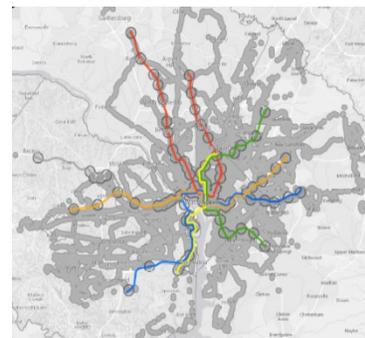
Metro monitors services periodically to compare the level or quality of service provided to minorities with service provided to others to ensure that the end result of policies and decision-making is equitable service. Similarly, even though not required under Title VI, Metro also monitors and analyzes the level or quality of service provided to low-income communities relative to other riders. Monitoring is conducted at least once every three years. Metro completed its monitoring analysis in 2020. The methodology and results are summarized below, and the report on the 2020 monitoring is included in **Appendix J**.

Results of the 2020 Title VI Monitoring Analysis

In the spring of 2020, Metro utilized the Board-approved service standards and policies established for Title VI service monitoring to compare the quality of service provided to minority and low-income populations to service provided to other riders. To evaluate whether service is equitably delivered across each mode, the monitoring analysis applied the Board-approved disparate impact/disproportionate burden (DI/DB) test of service changes. The DI/DB service test evaluated the percentage of minority and low-income riders that experienced service that failed to meet a given standard or policy versus system-level ridership for Metrorail and Metrobus.

Metro's monitoring period corresponds to that of the FTA Triennial period, 2017 to 2019. Therefore, staff used the service standards and policies that were in place as of the last submission of its Title VI Plan in 2017 and the service standards and policies have remained the same with this submission. Metro principally utilized ridership and operations data from the fall of 2019, and demographic data from the 2016 Metrorail Travel Trends Survey and the 2018 Metrobus Passenger Survey. To evaluate the service availability standard, Metro used 2014-2018 American Community Survey data for the service area.

Metro evaluated the service standards for vehicle load, vehicle headway, and on-time performance at the line level for both Metrorail and Metrobus, using the DI/DB threshold applicable to the number of impacted riders (i.e., those experiencing service not meeting the standard). Metro evaluated the service availability standard by determining the percentage of minority and low-income persons within walking distance of Metro services compared to the non-minority and non-low-income persons within walking distance.



Metro evaluated the service policy for transit amenities using its rail station design and planning standards. Since Metro does not own or operate bus stops beyond Metrorail station property, Metro only evaluated bus bays at its rail stations. Monitoring for the vehicle assignment service policies focused on evaluating fleet age, and whether minority and low-income riders disproportionately ride on buses or railcars that are significantly older than the system average.

The results of the 2020 analysis revealed no significant difference in service provided to minority and low-income passengers versus other passengers vis-à-vis the Board-approved standards and policies established for Title VI service monitoring. Metro provides an equitable level of service to all its customers on Metrobus and Metrorail during peak and off-peak service periods. For some service standards, minority and low-income riders tended to experience service that is better than the systemwide average. For cases where minority and low-income riders experienced service that failed to meet a given standard more than the system-level ridership, the results fell within the DI/DB threshold.

XIII. Major Service Change, Disproportionate Burden Policies

FTA's Title VI Circular requires Metro to conduct equity analyses for major service changes and all fare changes prior to implementation. The equity analysis determines if the planned changes are likely to result in disparate impacts on minority populations and/or disproportionate burdens on low-income populations. As the foundation of this process, Metro must develop a definition for "major service change," as only "major service changes" are subject to a service equity analysis.

Metro uses the required Disparate Impact and Disproportionate Burden (DI/DB) policies when performing equity analyses for proposed major service changes or any fare change. The DI/DB policies establish a threshold to determine when the adverse impacts of proposed changes are borne disproportionately by minority populations (disparate impact) or low-income populations (disproportionate burden). Federal requirements state that the thresholds must be applied uniformly, regardless of mode, and could not be altered until Metro's 2020 Title VI Program. The major service change policy and DI/DB policies also require Board approval and comment from the public on the proposed definitions for major service change, disparate impact, and disproportionate burden.

Metro staff completed an intensive process to first develop these Title VI definitions and policies in 2013, including:

- Review of Metro's current definitions and policies;
- Research and review of examples from peer agencies;
- Input from a broad range of staff during an agency-wide training on Title VI requirements;
- Input from a cross-departmental Title VI working group;
- Consultation with statisticians regarding the disparate impact and disproportionate burden thresholds;
- Testing of proposed thresholds on previous service and fare changes;
- Approval of proposed definitions and policies by executive leadership team and General Manager;
- Public input on the proposed definitions and policies via an online survey and focus groups; and
- Development of materials to brief the General Manager and present the proposed definitions and policies to the Board for approval.

In 2017 Metro's Title VI Working Group reviewed these equity analysis definitions and policies and determined that no changes were necessary. The current operations for Metrorail were updated to reflect the Board-approved FY2018 budget, but the major service change definitions for Metrorail remain the same for the duration of this reporting period.

Major Service Change Definition

Metro's major service change definitions for Metrobus and Metrorail are included in Tables 1 and 2, respectively.

Table 1: Major Service Change Definitions for Metrobus	
Parameters	Metrobus Definitions
Span	Change in span of service on a line of more than one hour in a single fiscal year.
Frequency	Change in revenue miles on a line of more than 20% in a single fiscal year.
Coverage/ Availability	Change in route miles on a line of 15% in a single fiscal year. Projected change of 10% of the riders on a line in a single fiscal year.

Table 2: Major Service Change Definitions for Metrorail		
Parameters	Metrorail Definitions	Current Operations
Span	Change in span of normal operations above or below the current service levels	Normal rail service begins 5AM Monday-Friday; 7AM on Saturday; 8AM on Sunday. Rail service ends 11:30PM Monday-Thursday; 1AM Friday and Saturday; 11PM Sunday.
Frequency	Change in frequency of normal operations above or below the current service levels	Normal weekday rush period maximums shall be 4 minutes on core interlined segments, and 8 minutes on all other segments; normal weekday midday maximums shall be 6 minutes on core interlined segments, and 12 minutes on all other segments; for the Blue, Orange, Yellow, Green, and Silver Lines the normal weekday late night maximums shall be 10 minutes on core interlined segments, and 20 minutes on all other segments; for the Red Line the normal weekday late night maximum shall be 7.5 minutes on core segments, and 15 minutes on all other segments
Coverage/ Availability	Complete and permanent scheduled station closure for one or more days in a week; opening of a new station. Addition or abandonment of a line.	

Disparate Impact and Disproportionate Burden Policies

The DI/DB policies are important because they influence whether Metro may implement proposed service or fare changes. If the equity analysis finds a potential disparate impact on minority populations, then Metro must analyze alternatives in order to avoid, minimize, or mitigate the potential disparate impacts. If Metro finds that, even after revisions, the proposed changes will still result in a disparate impact on minority populations, Metro may implement the change only if:

- There is a substantial legitimate justification for the proposed change, and
- Metro can demonstrate that there are no alternatives that would have a less disparate impact on minority and low-income riders but would still accomplish the legitimate program goals.

If the equity analysis finds a potential disproportionate burden on low-income populations, then Metro should take steps to avoid, minimize, or mitigate impacts where practicable. Metro's DI/DB policies for service equity analysis and fare equity analysis are summarized below.

DI/DB Policy for Service Equity Analysis: Metro has determined that a proposed service change has a potential disparate impact/disproportionate burden when the following thresholds for statistically significant disparities are met. These thresholds capture both the margin of error of the survey data as well as the probability that riders make a given trip (a concept well accepted in many court decisions in employment discrimination). The same thresholds apply for proposed service reductions and increases.

Table 3: DI/DB Thresholds for Service Equity Analysis		
*Total Riders Affected by Service Change (per weekday)	Riders by	Threshold for Significant Disparity (between % minority/low-income riders affected by service change and % of minority/low-income riders for the system or mode)
Up to 10,000		8%
10,001 to 20,000		7%
20,001 to 40,000		6%
Over 40,000		5%

* Based on natural breaks in Metro passenger survey data

Exceptions to using the above thresholds may occur if Metro has limited survey data available and the margin of error in the data is 10% or greater. In such cases, Metro will collect new data to ensure a margin of error consistent with this definition.

DI/DB Policy for Fare Equity Analysis: A disparate impact or disproportionate burden may exist if the difference between the percent changes in average fare for minority/low-income populations and for non-minority/non-low-income populations is greater than 5% (percentage points).

Public Outreach and Comment

When first developing the equity analysis definitions and policies in 2013, Metro used a two-pronged approach to collecting and considering public input on its proposed definitions for major service change, disparate impact, and disproportionate burden including: 1) focus groups with targeted community based organizations (CBOs), and 2) an online survey, video, and blog. These efforts and the results are summarized below.

Focus Groups

Other transit agencies' experiences indicated that major service change, disparate impact, and disproportionate burden policies were difficult concepts for staff to explain and for attendees to understand at meetings of the general public. Oftentimes transit staff received little input that was meaningful for the development of the Title VI policies. Therefore, Metro decided on a targeted approach to collect more meaningful input by meeting individually with CBOs.

Staff identified CBOs that represent Metro's diverse ridership and service area, and asked the organizations to set up focus groups of staff and customers. Metro staff used this one-on-one approach to share examples of how the policies will apply in different scenarios to help the focus group participants understand the potential impacts of the proposed policies. The focus groups were also a good opportunity to share information on Metro's Title VI policies and language assistance resources.

Metro staff met with seven focus groups, including around 100 customers and staff. Focus group participants represented diverse populations including minorities, low income persons, LEP persons, veterans, individuals with disabilities, elderly individuals, and students. Metro provided participants with a \$25 SmarTrip card. The focus groups proved to be an important outreach method to collect input from minority, LEP, and low-income populations. The input from the focus groups was combined with the survey results, described below, as focus group participants were asked to complete a survey at the end of the meetings.

Online Survey and Video

Metro also used an online survey to collect input on the proposed Title VI definitions. The survey was available on wmata.com, in both English and Spanish, and was accompanied by a short introductory video. Nearly 400 survey responses were received including input from the focus groups. The main takeaways were:

1. The majority of survey participants agreed with the proposed Title VI definitions for major service changes for Metrobus and Metrorail; and
2. Respondents believed even small differences between impacts on minority and non-minority riders are considered major.

Media

The project team worked with Metro's Media Relations Office to promote the online public survey. The press release was posted on Metro's website and "tweeted" on the agency's twitter feed, which had nearly 52,000 followers at the time.

Listserv Blast

Metro's Office of Equal Employment Opportunity maintains a database of CBOs to which it sends periodic communications and updates. Staff sent a notification to the contacts in this database to promote the online survey.

Online Blog

Metro staff also posted information to promote the online survey on Metro's planning blog, "PlanItMetro." The blog included direct links to the survey and both English and Spanish versions of the introductory video.

Summary

In 2013 Metro staff devoted significant time, research, and effort to develop the major service change definition and DI/DB policies and to engage the public for input on the proposed definitions. The Title VI definitions were approved by the Board in October 2013, and staff applied

the definitions and policies in completing Title VI analyses for major service changes and any fare changes during the reporting period.

In 2017 Metro's Title VI Working Group reviewed the major service change definition and DI/DB policies and determined that no changes were needed. Staff will continue using the above policies to complete Title VI analyses for upcoming major service changes or any fare changes in compliance with FTA Circular 4702.1B.

XIV. Equity Evaluations of Major Service Changes and Fare Changes

Written Equity Analysis Procedures

Data Sources

To assess the impacts of service changes and fare increases on minority and low-income communities, Metro relies on the following data sources and tools:

- Metrorail Farebox data
- Metrobus Farebox data
- Metro Trip Planner (Trapeze scheduling and fare data)
- Metrorail Passenger Survey data
- Metrobus Passenger Survey data
- Metrobus Ridecheck data
- Metrobus Automatic Passenger Counter (APC) data

Methodology

In order to adequately assess impacts, data is analyzed at the trip-making level.

- For Metrorail, race, ethnicity and income information is derived from a 2016 passenger origin/destination survey
- For Metrobus, demographic data collected from the 2018 bus survey on minority and income status is assigned at the bus line level.

All equity analyses use an 'impacted trips' approach to assess whether minority and low-income riders would be disproportionately affected by the changes.

Fare Equity Analyses

Using annualized ridership, revenue, and survey data, an average current fare is calculated for each fare category by demographic cohort. Future fares are then calculated in the same way using the proposed fare policy changes. Average future fares for minority and low-income riders are then compared with average future fares for non-minority and non-low-income riders to determine if differences between the average fares paid between the groups are greater than Metro's established disparate impact/disproportionate burden thresholds.

Service Equity Analyses

To assess the impacts of service changes (rail or bus) on ridership, the proposal is evaluated to determine the number of trips the service change will affect, both negatively by service reductions and positively by service increases for a given mode.

The ratio of minority/low income trips affected is calculated as follows: the corresponding number of minority and low-income trips for each service change is tabulated using on-board survey data for each bus line, if a bus service change, or by origin-destination pair, if a rail service change. The cumulative number of impacted minority and low-income trips is then calculated as percentage of all impacted trips and compared to the modal average. The difference in these percentages are then compared to the corresponding disparate impact and disproportionate burden thresholds to determine compliance.

Metro Equity Evaluations

Metro's Disparate Impact and Disproportionate Burden Policies as required under FTA Circular 4702.1B are incorporated in this section. The policies include definitions of major service change, disparate impact, and disproportionate burden that are employed whenever Metro is planning a major service change or any fare change.

During the past three years, Metro staff has evaluated significant system-wide service and fare changes and proposed improvements to determine whether those changes would have a disparate impact on minority riders or disproportionate burden on low-income riders. Metro routinely conducts Title VI analyses when service or fare changes are proposed.

As described in this section for service changes this requirement applies to "major service changes" only, and Metro utilizes the thresholds established by Board Policy to determine when a service change requires an equity analysis. Any change (increase or decrease) in Metro's fare structure requires an equity analysis.

From 2017 to March of 2020, Metro conducted 13 Title VI equity analyses on proposed major service changes and/or fare changes. These analyses followed the equity analysis guidance provided in FTA Circular 4702.1B:

- Service and Fare Changes, FY 2018 Operating Budget.
- Service Changes – 2017 Metrobus State of Good Operations
- Service Change, Metrobus NH2
- Service Change, Metrobus G9
- Service Change, Metrobus W9
- Service Change, Metrorail Red Line
- Fare Change, Parking Rates
- Service Change, Metrobus 3T
- Fare Change, Parking Rates
- Fare Change, Metrorail fares
- Service and Fare Changes, FY 2020 Operating Budget
- Service Changes – 2019 Metrobus State of Good Operations
- Service and Fare Changes, FY 2021 Operating Budget

The 13 equity evaluations listed above are included in **Appendix K**. Each analysis describes the following:

- Description of the proposed service or fare change (changes in cost or changes to fare media)
- Demographic profile of the affected ridership
- Comparison of the impact of the service change on minority or low-income riders

- vs. system averages, or the impact of the fare change on minorities vs. non-minorities and on low-income individuals vs. non-low-income individuals
- Description of disparate impact or disproportionate burden, if any
- Metro's efforts to mitigate any disparate impacts or disproportionate burdens, if applicable

These analyses were presented to Metro senior management and the findings reported to the Metro Board as part of the final approval process. The Board Resolutions approving each of the service or fare changes, including consideration of the equity analyses, are included in **Appendix K**

XV. BOARD APPROVALS

Metro's Board approved this 2020 Title VI Program Update on September __, 2020. A copy of the Board resolution (2020-##), including approval of the Monitoring Procedures and Results, is in **Appendix L**.

In 2013, Metro completed an extensive process to develop policy definitions for major service change, disparate impact, and disproportionate burden to use when conducting equity analyses of major service changes and any fare change. Metro engaged the public in this process and obtained Board approval on October 24, 2013. The Board resolution approving the definitions (2013-27) is included in **Appendix L**.

The Board resolutions approving the equity analyses completed during the reporting period are included in **Appendix K**.

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