



BI 2025-309: 2026-2028 Title VI Program Update

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December 8, 2025 | Transportation Committee



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Title VI Overview



What is Title VI?

- A federal law—part of the 1964 Civil Rights Act
- Prohibits discrimination on the basis of race, color, and/or national origin by recipients of federal funding
- FTA Circular 4702.1B outlines federal requirements for transit operations
- Applies to the Metropolitan Council and its subrecipients

Title VI Overview



What is a Title VI Program?

- An ensemble of existing policies and operational practices that demonstrate commitment to and compliance with Title VI law
- Must include:
 - Public Engagement Plan
 - Language Assistance Plan
 - Access to complaints by the public
 - Equity Analyses
 - Public rights posting of Title VI Notice
 - Efforts to encourage broad participation and membership on committees, Boards
 - Monitoring/Assisting subrecipients to ensure compliance with Title VI law
 - Updates every three years, approved by the Board

Title VI Overview

Title VI Program Document Sections

Three main sections:

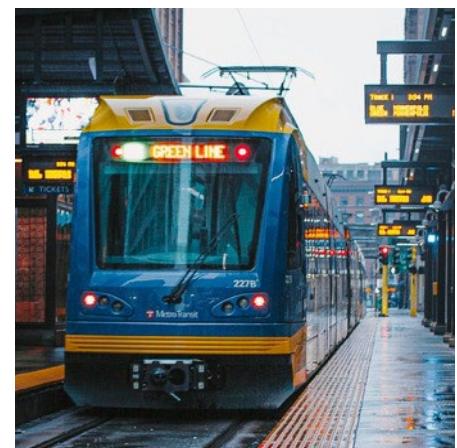
1. General Requirements
2. Fixed Route Provider Requirements
3. Metropolitan Planning Organization (MPO) Requirements



Part 1: General Requirements

The Council's role fulfilling Title VI

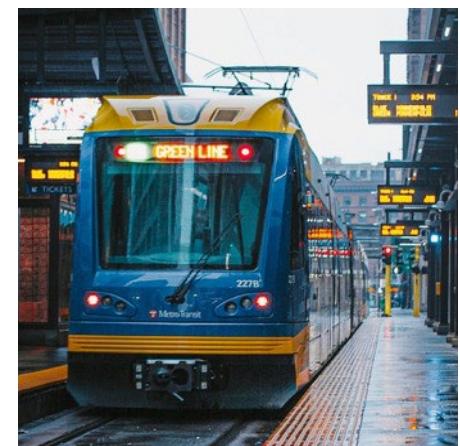
- Title VI Notice posting at public-facing locations
 - Metro Transit buses, trains
 - Metro Transit garages, lobbies, reception areas
- Complaint filing access and process
 - Complaint forms
 - Procedure (contact information)
- Public Participation Plan
 - Community-centered framework
 - Surveys, meetings, social media
- Language Assistance Plan (LAP)
 - Limited English Proficiency (LEP) Persons
 - Four-factor analysis
 - "Vital documents" samples
- Encourage Minority Participation on Boards, Committees
- Subrecipient Monitoring & Assistance
 - Monitor Title VI Plans
 - Provide assistance in preparation of Title VI Plans
- Determine Site/Location of Facilities
 - Storage, operations, maintenance centers



Part 2: Fixed Route Provider Requirements (slides 1/3)

Metro Transit's role fulfilling Title VI

- Why?
 - Prevent discrimination on the basis of race, color and national origin when routing, scheduling, or quality of service of transportation service is furnished as a part of the project on the basis of race, color, or national origin
- How?
 - Set system-wide service standards and policies
- Examples
 - Quantitative Standards for the following indicators:
 - vehicle load
 - service frequency
 - service availability
 - on-time performance
 - distribution of amenities
 - vehicle assignment



Part 2 (slides 2/3)

Major Service Change Policy

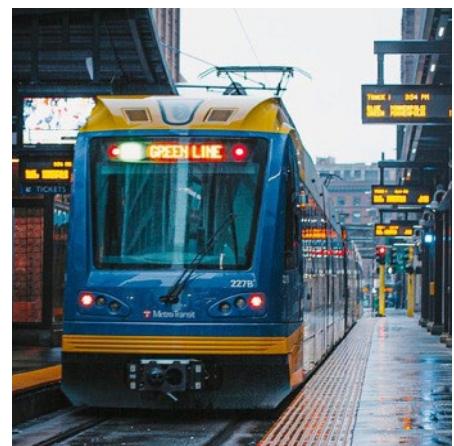
- Existing route(s)—one or more service changes resulting in at least a 25% change in the weekly in-service hours within a 12-month period (minimum of 3,500 annual in-service hours)
- A new route in a new coverage area (minimum net increase of more than 3,500 annual in-service hours)
- Restructuring of transit service throughout a sector or sub-area of the region as defined by Metro Transit
- Elimination of a transit route or branch without alternate fixed route



Part 2 (slides 3/3)

Disparate Impact / Disproportionate Burden Policy

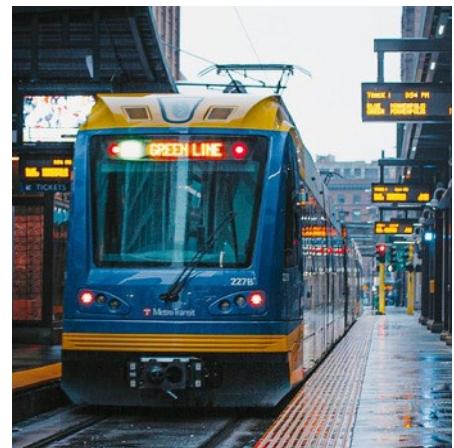
- Policy or practice that disproportionately impacts members of a group more than the overall population
- “Disparate impact” is used for race, color, national origin
- “Disproportionate burden” is used for low-income communities
- **Current Threshold = 90%**
 - Benefits are being provided to low-income populations at less than 90% than the benefits being provided to non-low-income populations.



Part 3: MPO Requirements

MTS's role fulfilling Title VI

- Planning area demographic profile
 - Maps
 - Procedures for engaging mobility needs of minority populations
 - Imagine 2050 – [Transportation Policy Plan](#)
- Investments
 - Analyze potential impacts of distribution of state and federal funds
 - [Transportation Improvement Program \(TIP\)](#)
 - Subrecipient engagement in funding process



Updates to the 2026-2028 Title VI Program

Updated Items

- Community Engagement
- Updated 2024 Service Standards and Policies Monitoring Evaluation
- Several completed service, fare, and facility siting equity analyses

Service Equity Analysis	DI	DB
2022 annual system review	No	No
2023 annual system review	No	No
2024 annual system review	No	No
2025 METRO Gold Line	No	No
2025 Network Now	No	No
2025 Northstar Commuter Rail Suspension and Replacement Service Plan	Potential DI	Potential DB
Fare Equity Analysis	DI	DB
2024 Fare Changes	No	No
2025 Northstar Commuter Rail Suspension and Replacement Service Plan	No	Potential DB
Facility Siting Equity Analysis	DI	DB
2025 Shop & Warehouse	TBD	TBD

Action Requested

That the Metropolitan Council shall approve the 2026-2028 Title VI Program.