# **Title VI Service Monitoring**

Service monitoring is required by the Federal Transit Administration (FTA) for transit agencies to comply with Title VI of the Civil Rights Act of 1964. Every three years, CapMetro is audited by the FTA to evaluate the agency's service and determine whether service is being provided in a non-discriminatory manner or without the effect of discrimination. CapMetro uses Title VI Service Monitoring as a baseline for understanding whether or not service is being provided equitably, and other equity analyses are regularly conducted.

Service monitoring is:

- ✓ Required by law.
- ✓ A mechanism for evaluating and preventing discrimination.
- ✓ Done at least every three years.
- ✓ Completed in addition to CapMetro's other equity analyses.

### What We Monitor

The FTA requires fixed route transit providers to set standards and policies for each specific fixed route mode of service they provide. Fixed route modes of service include but are not limited to, local bus, express bus, commuter bus, bus rapid transit, light rail, subway, commuter rail, passenger ferry, etc.,

and do not include demand-response services, such as Pickup. Each of the 6 standards that FTA requires for monitoring are further detailed in the Service Standards and Guidelines.

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Standard	Vehicle Load	Vehicle Frequency	On-Time Performance	Service Availability	Transit Amenities Policy	Vehicle Assignment Policy
What We Measure	What is the ratio of passengers to total seated capacity?	How often does a bus pass by a bus stop during an hour?	Are buses departing from timepoints on time?	How much of the transit- supportive service area has bus stops within walking distance?	How are bus stop and station amenities distributed?	How are vehicles assigned to routes?
Indications of Adverse Impacts	Are buses on minority routes more crowded than on non- minority routes?	Are buses on minority routes coming less frequently than on non- minority routes?	Are buses on minority routes arriving late more often than on non- minority routes?	Within the transit- supportive service area, is service provided equally to areas of minority and non-minority populations?	Are stops in minority census tracts receiving fewer amenities?	Do minority routes receive incorrect vehicle assignments more often than non- minority routes?

Table 1: Service Monitoring Metrics

## How We Monitor

Once all service has been analyzed based on the agency's standards, CapMetro compares the above standards for minority and non-minority groups using CapMetro's board-approved Title VI policy.<sup>1</sup> A disparate impact refers to a service that results in inequitable outcomes for BIPOC populations. If service is found to have a disparate impact, CapMetro will describe the action steps needed to reduce the impact.

#### Which Routes Are Monitored

The FTA only requires analyzing a random sample. However, CapMetro voluntarily monitors all routes. This provides a greater level of precision by avoiding "luck of the draw" issues; if only good performing routes are randomly selected, the results may show a more positive performance result than the reality (and vice versa).

#### **Results of Monitoring**

Once the service monitoring results are completed, they are presented to CapMetro's Board of Directors. Once accepted by the board, the results are placed into CapMetro's Triennial Title VI submission to the Federal Transit Administration. The FTA reviews the submission and may ask follow-up questions before accepting the submittal.

<sup>i</sup>https://www.capmetro.org/titlevicompliance