

# Title VI Program Plan Update Report

Milwaukee County Board of Supervisors  
Transportation and Transit Committee



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# 1964 Civil Rights Act - Title VI



- Title VI of the Civil Rights Act of 1964 states:

“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.”
- As a recipient of funds from the Federal Transit Administration (FTA), MCTS must comply with Title VI of the Civil Rights Act of 1964, the U.S. Department of Transportation’s implementing regulations at 49 CFR Part 21, and FTA’s Title VI Circular 4702.18.

# Federal Transit Administration and Title VI



- The FTA requires transit systems prepare a “Title VI Program Plan Update” every three years to document compliance.
- As a recipient of FTA funds, MCTS must **document** the Plan Update has been **approved by the County Executive and the County Board of Supervisors** before it is submitted to the FTA.
- The deadline for submittal is **October 1<sup>st</sup>, 2026.**

# Federal Transit Administration and Title VI



- MCTS has previously submitted Plan Updates to the County Board in 2014, 2017, 2020 and 2023
- The 2023 Plan Update was approved by the County Board in July 2023 (File #23-700)
- The 2023 Plan Update is available at [ridemcts.com](https://ridemcts.com)



Milwaukee County Transit System  
2023 Title VI Program



# Title VI Program Plan Update - Purpose



- Ensure that transit services are provided in a non-discriminatory manner
- Promote full and fair participation in transit decision-making without regard to race, color, or national origin
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

# Title VI Program Plan Update - Overview



FTA Circular 4702.1B sets the guidelines for providing information on the non-discriminatory provision of transit services as required by Title VI of the Civil Rights Act of 1964.

The Update includes ten general requirements and five additional requirements that are specifically mandated for transit systems.

# Title VI Program Plan Update – Ten General Requirements



1. Title VI Notice to the Public
2. Title VI Complaint Procedures / Form
3. Summary of Title VI Complaints
4. Public Participation Plan
5. Public Outreach and Involvement Activities
6. Limited English Proficiency Plan
7. Minority Representation on Planning and Advisory Bodies
8. Monitoring of Sub Recipient Title VI programs
9. Approval of the Title VI Program Update by the governing entity
10. Definitions of a Major Service Change, Disparate Impact, and Disproportionate Burden

# Title VI Program Plan Update – Specific Requirements



The Title VI Program Plan Update also includes specific requirements for transit providers:

- Service standards and policies
- Demographic data on the minority and low-income populations served
- Title VI Monitoring program
- Description of the engagement process regarding the creation of policies on major service changes, disparate impact and disproportionate burden
- Recent examples of Service and Fare Equity Analyses

# Service and Fare Equity Analyses



- The FTA requires transit systems perform equity analyses under the following situations:
  - A *Service Equity Analysis* is done prior to a major service change to a route / routes.
  - A *Fare Equity Analysis* is done prior to any change in fares or to the fare system.
- The purpose is to proactively assess the impacts of such changes upon the minority and low-income population relative to the non-minority and non-low-income population.

# Service and Fare Equity Analyses



- Any changes that do not have a similar impact on both population groups are considered to have a “disparate impact” or a “disproportionate burden”:
  - A disparate impact is when a practice disproportionately affects members of a group identified by race, color, or national origin.
  - A disproportionate burden is when a practice disproportionately affects low-income populations more than non-low-income populations.

# Service and Fare Equity Analyses



- MCTS uses the “four-fifths rule” as the threshold for determining if a disparate impact or disproportionate burden would exist with a proposed change in service or fares:
  - *If the impact requires the minority population to receive benefits 20% less or to bear adverse effects 20% more than those benefits / adverse effects received by the non-minority population, the impact will be considered a disparate / disproportionate.*
- If an impact or burden would exist, the transit system must take steps to avoid, minimize, or mitigate the impacts where practical.

# Service Equity Analysis - Process



- The first step in a service equity analysis is to determine if a proposed change meets the definition of a “major service change”:
  - Does the change affect 25% of the route’s bus hours?
  - Does the change affect 25% of the route’s one-way mileage?
  - Does the change affect 25% of the service span?
  - Does the change reduce the frequency of service by 50%?
  - Does the change create a gap in service greater than a half mile?
- If the proposed service change does not meet any of these definitions, then the transit system does not need to prepare the analysis.

# Service and Fare Equity Analyses – 2026 Plan Update



The 2026 Program Plan Update includes the following service and/or fare equity analyses:

## Service Equity Analyses

- 2024 - SAFE Analyses for school tripper service.
- 2025 - MOVE 2025 Service Changes, 2026 Budget Routing & Service Changes.

## Fare Equity Analyses

- 2024 - Fare Cap increases in 2025 fiscal year.
- 2025 – Fare & Fare Capping Increases in 2026 fiscal year and contactless payment integration.

Thank You!

Questions?

