



Title VI Service Equity Analysis for November 2024 Service Changes

Prepared September 2024

Purpose

In compliance with Title VI of the Civil Rights Act of 1964, the Federal Transit Administration (FTA) requires all transit agencies receiving federal funding to monitor the performance of their systems, ensuring services are made available and/or distributed equitably. Each transit agency must develop a Title VI Program to document its policies and procedures for meeting FTA requirements. The DART Title VI Program (last updated in May 2019) stipulates that any major service change must be evaluated to determine its impact on minority (race, ethnicity or national origin) and low-income populations.

The Des Moines Area Regional Transit Authority (DART) is the primary fixed-route transit operator serving the Des Moines Metropolitan Area and the largest public transit agency in Iowa. The agency serves 11 cities and other parts of Polk County. Member communities include: Altoona, Ankeny, Bondurant, Clive, Des Moines, Grimes, Johnston, Pleasant Hill, Urbandale, West Des Moines, and Windsor Heights.

This Title VI analysis will perform the following functions:

- Describe the November 2024 service changes that continue to be in effect
- Determine whether the changes constitute a “major service change” or not,
- Evaluate how the changes may impact low-income and minority populations, and
- Identify strategies to avoid, minimize, or mitigate any disproportionate burdens, disparate impacts or any potentially negative outcomes.

Relevant Policies

DART's Service and Fare Equity Policy (approved by the Commission in March 2019 and included in DART's 2022 Title VI Program Update) outlines how Title VI analysis should be performed for any major service change. The following definitions apply to this service change Title VI analysis:

- *Major Service Change*: A major service change is when 25 percent or more of a route's revenue hours or revenue miles is added or reduced, or when the total revenue hours for the system are expanded or reduced by 10 or more percent. (DART 2019 Title VI Program Update, Service and Fare Equity Policy)
- *Disparate Impact*: DART will consider a proposed major service change to have a disparate impact if the affected route's minority population is more than 5 percentage points greater than the system average.
- *Disproportionate Burden*: DART will consider a proposed major service change to have a disproportionate burden if the affected route has a low-income population more than 5 percentage points greater than the system average.

Proposed Route Changes for November 2024

The scope of the November 2024 service changes are to scale services to the approved FY 2025 budget and improve reliability. Table 1 lists the changes in service levels proposed for November 2024.

Table 1 Service Changes for November 2024

Route	Proposed Service Changes
D-Line	<ul style="list-style-type: none"> Eliminate
15 – 6 th Av	<ul style="list-style-type: none"> Extend weekend headways from 30-minutes to 60-minutes
17 – Hubbell Av	<ul style="list-style-type: none"> Realign a portion of the route from 36th Avenue SW to 34th Avenue SW in the City of Altoona, located one block east of the existing route.
52 – Jordan Creek	<ul style="list-style-type: none"> Extend weekday headways from 30-minutes to 40-minutes
74 – NW Urbandale	<ul style="list-style-type: none"> Realign a portion of the route from 114th Street to 112th Street in the City of Urbandale, located one block east of the existing route.

Impact of Service Changes

DART policy requires that all major service changes be evaluated for any potential disproportionate burden or disparate impact. The impacts of proposed changes must be calculated to determine whether or not the change is a “major service change.” Route-by-route changes in revenue hours and miles is summarized in Table 3 located in the appendix.

Result: DART defines a “major service change” as when 25 percent or more of a route's revenue hours or revenue miles is added or reduced, or when the total revenue hours for the system are expanded or reduced by 10 percent”. Analysis found the following changes meet the criteria of a major service change: D-Line (See Appendix Table 3). Thus, changes to these routes will be the focus for the remainder of the report. Changes to remaining impacted routes are not considered a major service change by DART's policy.

Table 2 Major Service Changes for November 2024

Route	Major Service Change
D-Line	<ul style="list-style-type: none"> Eliminate

The Elimination of the D-Line Downtown Shuttle is determined to be a major service change due to the total elimination in revenue miles and revenue hours.

DART considers this major service change to pose both a disparate impact and disproportionate burden because the populations that live in the vicinity of the D-Line are disproportionately higher percentage of minority and low-income residents compared to the system as a whole (See Appendix Table 4 and Table 5).

Mitigation Measures

Typically, when agencies find that proposed service or fare changes cause disparate impacts or disproportionate burdens, they are required to mitigate those changes in some way. The FTA Circular provides an exception to this for legitimate planning purposes. This allows agencies to, for example, reduce service on an extremely low-performing route, even if that would otherwise cause a disparate impact or disproportionate burden.

The D-Line was identified for elimination because of low ridership and productivity, and because it overlaps significantly with other routes, including Route 1, 4, 10, 11, and 60. The D-Line is a free shuttle which operations on weekdays every 15-minutes from 6:30 am to 6:00 pm and on Saturdays from 10:00 am to 5:00 pm. The route is relatively short, about 2 miles, and is a 10-minute trip from end-to-end. Users will still have an alternative available to them of several bus routes which operate on the same streets 7-days a week. In addition, Downtown Des Moines is walkable with sidewalks (cleared of snow in the winter), 4.2 miles of skywalks, and 12 B-Cycle bike share stations within a block of the existing route.

Summary of Findings

The D-Line is designated as both a minority and low-income route, so its elimination represents a disparate impact and disproportionate burden. The D-Line is also unique in that it is a free downtown shuttle. However, any service cut to meet DART's established budget was likely to impact minority and low income routes. The D-line was identified for elimination because of low ridership and productivity, and because it overlaps significantly with other routes, including Route 1, 4, 10, 11, and 60, so riders will still have an alternative available to them.



APPENDIX

Methodology and Analysis

Assessment of Service Proposal for Major Service Change Determination

A major service change is when 25 percent or more of a route's revenue hours or revenue miles is added or reduced, or when the total revenue hours for the system are expanded or reduced by 10 or more percent."(DART 2022 Title VI Program Update, Service and Fare Equity Policy). Table 3 below shows the magnitude of the proposed change by each affected route. Highlighted routes are identified as major service changes.

Table 3 Service Change Hours and Miles Comparison

Route Name	Current		Proposed		Change	
	Revenue Hours	Revenue Miles	Revenue Hours	Revenue Miles	% change in Revenue Hours	% change in Revenue Miles
D-Line Downtown Shuttle	90.2	1,213.7	0	0	-100%	-100%
15 - 6 th Av	124.1	2,077.4	115.3	1,922.4	-7%	-7%
17 - Hubbell Av	235.4	4,452.8	233.3	4,572.2	-1%	+3%
52 - Jordan Creek	216.4	5,326.9	191.4	4,512.8	-12%	-15%
74 - NW Urbandale	24.4	475.5	21.4	466.9	-12%	-2%
FULL NETWORK	513.30	9,456.19	514.70	9,475.52	0%	0%

Geographic Concentrations of Minority and Low-Income Populations

Data Sources

Data from the 2023 American Community Survey (ACS) and the 2022 DART Customer Survey were used to perform the Title VI analysis.

American Community Survey

2023 ACS five-year estimates provide census block group-level population data for the geography-based analysis.

DART defines low-income as at or below the federal poverty line. Individuals who reported in the ACS that their income over the previous 12 months fell below the federal poverty line were defined as low-income for the geographic analysis.

For purposes of this analysis, the following origin by race categories are defined as minority:

- Black or African American alone
- American Indian or Alaska Native alone

- Asian alone
- Native Hawaiian or Other Pacific Islander alone
- Hispanic or Latino
- “Other” race alone
- Two or more races

2022 DART Customer Survey

The following questions from the 2022 DART Customer Survey were analyzed for the service equity analysis:

- **Route:** The route the survey was collected on.
- **Demographics, Ethnicity:** Which of the following best describes your race/ethnicity?
- **Demographics, Household Size:** Including yourself, how many people live in your household?
- **Demographics, Income:** Last year, what was your total household income, before taxes?

All respondents who indicated a race/ethnicity other than Non-Hispanic White/Caucasian were considered a minority for purposes of this analysis. If a respondent indicated more than one race/ethnicity, they were considered a minority. Furthermore, if a respondent indicated “other,” they were considered a minority. Records where the respondent did not answer the race/ethnicity question were excluded from the disparate impact analysis, as their minority status could not be determined.¹

Respondents were classified as low-income or non-low-income based on the number of people living in their household and reported income. Respondents whose household income fell beneath the federal poverty line at their household size were classified as low-income.

Route Categorization

Routes were categorized as minority routes and low-income routes based on the ACS analysis and the Customer Survey analysis. The ACS analysis looked at populations living within a half mile of DART service to categorize routes as minority and low-income. Routes were categorized as a minority route if the minority population living within a half mile of the route was five (5) percentage points higher than the system average and were categorized as low-income if the low-income population living within a half mile of the route was five (5) percentage points higher than the system average. Overall, 25% of the population living within a half mile of DART service identifies as a minority, so any route serving a minority population greater than 30% is considered a minority route. Similarly, 21% of the population is low-income, so any route serving a low-income population greater than 26% is considered a low-income route.

A similar approach was applied to the survey data, with routes being categorized as

¹ If these respondents did not answer the race/ethnicity question but did answer the questions related to household size and income, they were still included in the disproportionate burden analysis. The FTA directs recipients to analyze disparate impact and disproportionate burden separately.

minority or low-income if survey responses indicated minority or low-income ridership as five (5) percentage points higher than the system average, respectively. Table 1 shows how routes were designated as minority and non-minority, and Table 2 shows how routes were designated as low-income and non-low-income. If a route was determined to be minority or low-income based on census data or survey data, they were considered a minority or low-income route for this analysis.

Table 4: Minority Route Categorization

Table 4 Minority Route Categorization

Route	Census Minority Percentage	Census Minority Route?	Survey Minority Percentage	Survey Minority Route?	Minority Route?
1	32%	Yes	42%	No	Yes
2	31%	Yes			Yes
3	34%	Yes	40%	No	Yes
4	34%	Yes	54%	Yes	Yes
5	22%	No	59%	Yes	Yes
6	31%	Yes	44%	No	Yes
7	23%	No	49%	No	No
8	19%	No	63%	Yes	Yes
10	34%	Yes	75%	Yes	Yes
11	21%	No	60%	Yes	Yes
13	45%	Yes	0%	No	Yes
14	37%	Yes	57%	Yes	Yes
15	40%	Yes	47%	No	Yes
16	4%	No	50%	No	No
17	33%	Yes	60%	Yes	Yes
50	32%	Yes	29%	No	Yes
52	26%	No	38%	No	No
60	32%	Yes	46%	No	Yes
72	20%	No	43%	No	No
74	22%	No			No
92	25%	No	0%	No	No
93	26%	No	0%	No	No
94	27%	No	0%	No	No
95	26%	No			No
96	23%	No	67%	Yes	Yes
98	22%	No	0%	No	No
99	26%	No			No
D-LINE	34%	Yes			Yes
LINK	36%	Yes			Yes
System	25%		46.5%		

Table 5: Low-Income Route Categorization

Route	Census Low-Income Percentage	Census Low-Income Route?	Survey Low-Income Percentage	Survey Low-Income Route?	Low-Income Route?
1	29%	Yes	60%	Yes	Yes
2	27%	Yes			Yes
3	29%	Yes	47%	No	Yes
4	32%	Yes	63%	Yes	Yes
5	20%	No	63%	Yes	Yes
6	28%	Yes	60%	Yes	Yes
7	23%	No	58%	No	No
8	21%	No	33%	No	No
10	28%	Yes	0%	No	Yes
11	22%	No	33%	No	No
13	31%	Yes	0%	No	Yes
14	26%	No	57%	No	No
15	37%	Yes	60%	Yes	Yes
16	27%	Yes	68%	Yes	Yes
17	31%	Yes	48%	No	Yes
50	26%	Yes	75%	Yes	Yes
52	23%	No	36%	No	No
60	31%	Yes	60%	Yes	Yes
72	13%	No	40%	No	No
74	10%	No			No
92	21%	No	0%	No	No
93	21%	No	50%	No	No
94	24%	No	33%	No	No
95	23%	No			No
96	20%	No	0%	No	No
98	20%	No	54%	No	No
99	26%	Yes			Yes
D-LINE	30%	Yes			Yes
LINK	31%	Yes			Yes
System	21%		53%		

Figure 1 DART Service Area: Areas of Above Average Minority Populations

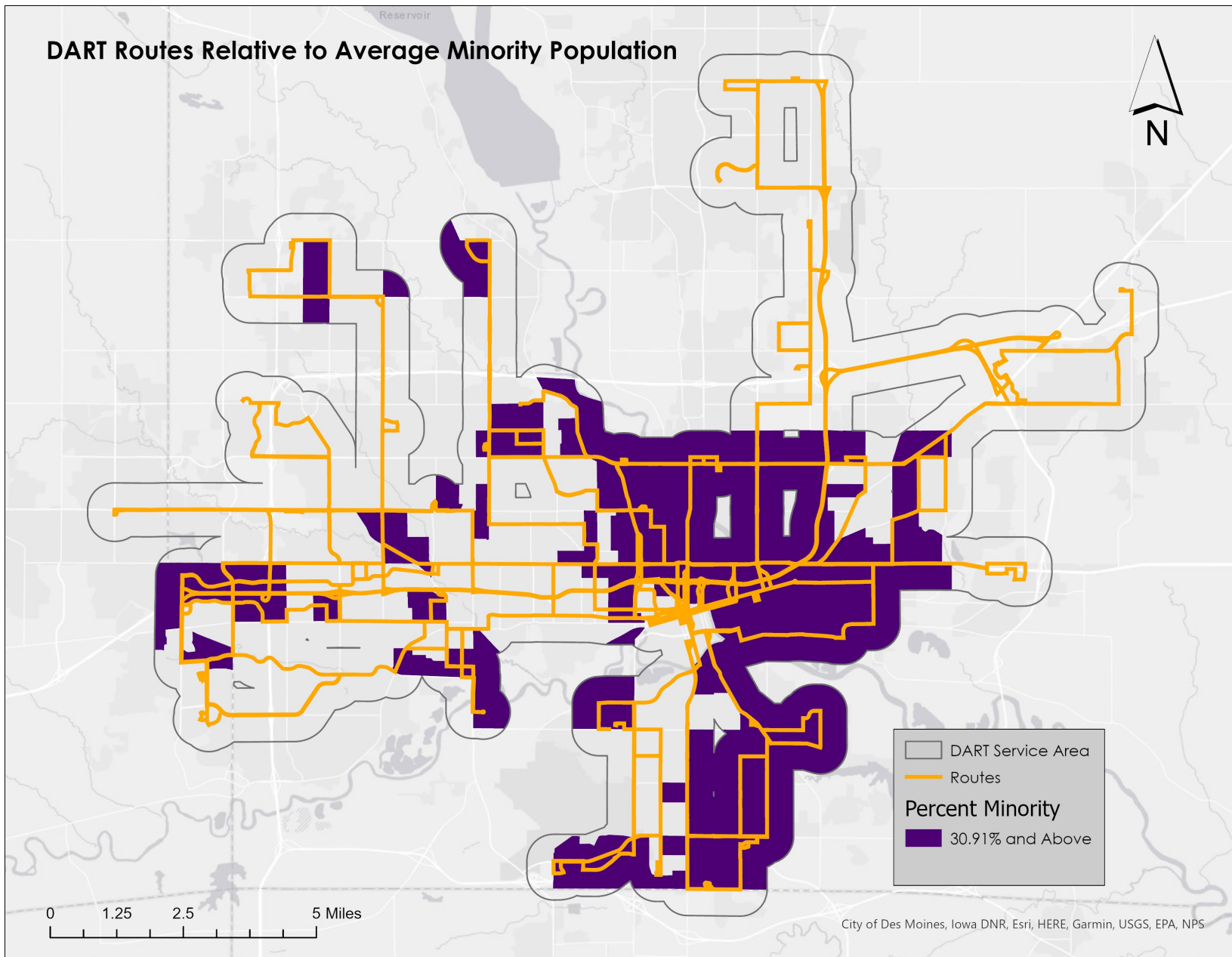


Figure 2 DART Service Area: Areas of Above Average Poverty

