


Date: September 24, 2025

To: Board of Directors

From: Sam Desue, Jr. 

Subject: **RESOLUTION NO. 25-09-47 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) APPROVING ITS UPDATED 2025 TITLE VI PROGRAM**

1. Purpose of Item

This Resolution requests that the TriMet Board of Directors (Board) approve TriMet's updated 2025 Title VI Program, attached hereto as Exhibit A, for submission to the Federal Transit Administration (FTA).

2. Type of Agenda Item

- ☐ Initial Contract
- ☐ Contract Modification
- ☒ Other: Approval of TriMet's updated 2025 Title VI Program

3. Reason for Board Action

TriMet must document the Board's review and approval of its updated 2025 Title VI Program, and submit it to the FTA by October 1, 2025.

4. Type of Action

- ☒ Resolution
- ☐ Ordinance 1st Reading
- ☐ Ordinance 2nd Reading

5. Background

Title VI was enacted as part of the landmark Civil Rights Act of 1964, and prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Pursuant to the Civil Rights Act and U.S. Department of Transportation (DOT) and FTA regulations, transit agencies must update and submit their Title VI Programs to the FTA every three years. Last September 22, 2022, pursuant to Resolution No. 22-09-51, the Board reviewed and approved TriMet's updated Title VI Program and it was timely submitted it to the FTA.

At this time, TriMet must again document the Board's review and approval of its updated 2025 Title VI Program and submit it to the FTA on or before October 1, 2025, as a condition of receiving federal funds.

In between submittals of its updated Title VI Programs, the Board regularly reviews and approves Title VI analyses accompanying any proposed Major Service Change (as defined in the Program) or fare change. All such analyses conducted since TriMet's 2022 submittal of its updated Title VI Program are included as attachments in the updated Program document.

Per FTA Circular 4702.1B, providers of fixed route public transportation must include the following in each Title VI Program:

- 1) A copy of the recipient's Title VI notice to the public that indicates the recipient complies with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI.
- 2) A copy of the recipient's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.
- 3) A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission.
- 4) A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission.
- 5) A copy of the recipient's plan for providing language assistance to persons with limited English proficiency.
- 6) A table depicting the racial breakdown of the membership of transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, and a description of efforts made to encourage the participation of minorities on such committees or councils.
- 7) A narrative or description of efforts used to ensure subrecipients are complying with Title VI, as well as a schedule of subrecipient Title VI program submissions.
- 8) If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.
- 9) System-wide service standards and system-wide service policies.
- 10) A demographic analysis of the transit provider's service area.
- 11) Data regarding customer demographics and travel patterns, collected from passenger surveys.
- 12) Results of the monitoring program of service standards and policies and any action taken, including documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the board's, governing entity's or official(s)'s consideration, awareness, and approval of the monitoring results.
- 13) A description of the public engagement process for setting the "major service change policy" and disparate impact policy.
- 14) A copy of board meeting minutes or a resolution demonstrating the board's, governing entity's or official(s)'s consideration, awareness, and approval of the major service change policy and disparate impact policy.
- 15) Results of equity analyses for any major service changes and/or fare changes implemented since the last Title VI Program submission.
- 16) A copy of board meeting minutes or a resolution demonstrating the board's, governing entity's or official(s)'s consideration, awareness, and approval of the equity analysis for any service or fare changes required by this circular.

TriMet's updated 2025 Title VI Program, provided as Exhibit A, includes all elements listed above.

6. Financial/Budget Impact

There is no financial impact associated with the updated Title VI Program.

7. Impact if Not Approved

The Board's approval and TriMet's submission of the updated 2025 Title VI Program to the FTA by October 1, 2025 is required by federal statute and regulations as a condition of receiving federal funding.

RESOLUTION NO. 25-09-47

**RESOLUTION NO. 25-09-47 OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET)
APPROVING ITS 2025 TITLE VI PROGRAM UPDATE**

WHEREAS, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d, *et seq.* (the Act), and its implementing regulations at 49 CFR Part 21, the U.S. Department of Transportation (DOT) and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color, or national origin; and

WHEREAS, as a recipient of federal funds, TriMet is required to comply with the Act and applicable DOT and FTA implementing regulations; and

WHEREAS, the Board receives periodic briefings on TriMet's Title VI Program in the course of any system service changes, fare changes, or siting of certain types of facilities, including any potential disparate impacts and/or disproportionate burdens arising from the changes; and

WHEREAS, the Board has authority under ORS Chapter 267 to approve by Resolution TriMet's updated 2025 Title VI Program; and

WHEREAS, the Board has determined that TriMet's updated 2025 Title VI Program, attached hereto as Exhibit A, should be approved and submitted to the FTA;

NOW, THEREFORE, BE IT RESOLVED:

1. That TriMet's updated 2025 Title VI Program shall conform with applicable law.
2. That the Board hereby approves TriMet's updated 2025 Title VI Program and authorizes its submission to the FTA.

Dated: September 24, 2025

Presiding Officer

Attest:

Recording Secretary

Approved as to Legal Sufficiency:



Legal Department