

**MEMORANDUM**

TO: Knoxville Transportation Authority

FROM: Doug Burton, TPO  
Melissa Roberson, KAT  
Belinda Woodiel-Brill, KAT  
Jacob Wright, KAT

DATE: November 14, 2019

SUBJECT: KAT Title VI Report (to be approved at KTA November meeting)

Title VI is part of the Civil Rights Act of 1964 that requires agencies that receive federal funding to not discriminate. In particular, the Federal Transit Administration (FTA) wants to be sure that the level and quality of transit services being provided is done so in a nondiscriminatory manner and that the public has a fair chance to participate in the public transportation decision-making process.

To help prove that KAT is in compliance with Title VI, a report must be prepared every three years. KAT and the Knoxville Regional Transportation Planning Organization (TPO) have a long history of working on Title VI issues together, including preparing the required Reports. In October of 2012, the FTA updated the Title VI Requirements Circular. The level of documentation increased dramatically and the FTA started requiring that the local transit oversight board endorse the Report. The last report was approved by the KTA in December of 2016. This Report is the required three-year update and must be approved by the KTA. The approval of the draft KAT Title VI Report is on the KTA's November meeting agenda.

The Report itself is an assemblage of various documents, excerpts, tables, and maps that help show KAT is in compliance. The FTA in their Circular provides a specific checklist of the types of documents they want to review. It has been our previous experience that the FTA prefers that the Report follow that checklist.

The Report itself is close to 300 pages. A good portion of the Report you have already reviewed. The Monitoring Report section was approved by the KTA in October.

I have included a Summary of the Title VI Report for your review. You can review the entire draft Report at the following link: <https://knoxtpo.org/home/titlevi/2020/draft.pdf>. You must use the link to see the Report. If the link does not work paste it into your browser.

If you have any questions on the Report please feel free to contact Doug Burton at 865-215-3824 or at [doug.burton@knoxtpo.org](mailto:doug.burton@knoxtpo.org).

**CITY OF KNOXVILLE  
&  
KNOXVILLE AREA TRANSIT**

**FEDERAL TRANSIT ADMINISTRATION**

**TITLE VI REPORT**

**2020**

**DRAFT**

## **Knoxville Area Transit**

301 Church Avenue

Knoxville, TN 37915

865-215-7800 (Phone)

865-215-7820 (Fax)

[www.katbus.com](http://www.katbus.com)

FTA Recipient Grantee I.D. #1124

Melissa Roberson – Interim Director of Transit (Title VI Coordinator)

Belinda Woodiel-Brill – Chief Planning & Public Information Officer

Jacob Wright – Financial Analyst

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Knoxville Area Transit (KAT) is the public transit provider for the City of Knoxville, Tennessee. KAT is operated by a non-profit organization called K-Trans Management, Inc. Federal grant funding is managed by the City of Knoxville, who is the direct recipient of Federal Transit Administration (FTA) Section 5307 and Section 5339 funding. In most instances the terms: Knoxville Area Transit, KAT, and the City of Knoxville refer to the staff of KAT who are charged with the responsibility of meeting all Federal requirements, including those under Title VI and FTA Circular 4702.1B.

KAT also receives Federal funding through the Tennessee Department of Transportation (TDOT). As a recipient of these funds, KAT must comply with both Federal Title VI regulations and TDOT requirements. In some instances, KAT has selected to use TDOT's Title VI procedures. TDOT's Title VI Program has been certified by FTA.

KAT coordinates regional planning activities, including those under Title VI, with the Knoxville Regional Transportation Planning Organization (TPO), the local Metropolitan Planning Organization (MPO) for the Knoxville urban area.

This report was prepared in cooperation with the U.S. Department of Transportation, Federal Highway Administration, Federal Transit Administration, and the Tennessee Department of Transportation.

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### **Title VI Nondiscrimination Statement**

The City of Knoxville/Knoxville Area Transit operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. To request additional information on the civil rights program, or to request a form to file a complaint under this program, persons may submit a "contact" form at [www.katbus.com](http://www.katbus.com) or call 865-637-3000. Or, a complaint may be filed directly with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

For additional Title VI information contact:

Knoxville Area Transit

Attention: Melissa Roberson, Title VI Coordinator

301 Church Avenue

Knoxville, TN 37915

865-215-7800 (Phone)

**City of Knoxville & Knoxville Area Transit  
Federal Transit Administration  
Title VI Report**

**Introduction**

Knoxville Area Transit (KAT) ensures compliance with Title VI of the Civil Rights Act of 1964; 49 CFR, part 21; related statutes and regulations to the end that no person shall be excluded from participation in or be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance from the U.S. Department of Transportation on the grounds of race, color, sex, or national origin.

As required, KAT is submitting a Title VI Report to the Federal Transit Administration (FTA). This Report follows the requirements of FTA Circular 4702.1B – Title VI Requirements and Guidelines for FTA Recipients (October 1, 2012).

KAT is a public transit provider located in the City of Knoxville, Tennessee. KAT offers a variety of transit services, including fixed route bus, a downtown trolley circulator, and a demand response service called The Lift for persons with disabilities. KAT has a fleet of 69 fixed-route buses and 24 paratransit vans. KAT provides approximately three million trips a year.

KAT's annual operating budget for FY 2020 is approximately \$23.0 million. KAT is officially operated by a non-profit titled, K-Trans Management, Inc. KAT has a financial operating arrangement with the City of Knoxville who is the official grantee for the Section 5307 Urban Area and Section 5339 Bus & Bus Facilities funds. Routing and fare decisions are made by the Knoxville Transportation Authority (KTA), a board established by the City of Knoxville and made up of eight citizens and one City Council member.

The Metropolitan Planning Organization (MPO) for the Knoxville urban area is called the Knoxville Regional Transportation Planning Organization (TPO). KAT and the City of Knoxville are both partners in the TPO coordinated planning process. The Knoxville urban area population as defined by the 2010 U.S. Census is 558,696. The TPO defines its Planning Area as all of Knox County and all other areas within the Knoxville urban area. This would include most of Blount County and parts of Anderson, Loudon and Sevier Counties.

The City of Knoxville is located within the Knoxville urban area. The City of Knoxville population as defined by the U.S. Census for 2017 is 187,347. KAT defines its general service area as ½ mile to either side of a fixed-route. The KAT service area does extend into Knox County proper in a few instances. The population of the KAT service area is estimated at 159,234.

The FTA documents its reporting requirements in Circular – C 4792.1B. The Circular provides recipients of FTA financial assistance guidance and instructions on how to carry out the U.S. Department of Transportation Title VI regulations (49 CFR part 21) and how to integrate into their programs and activities considerations expressed in the

department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005). The Circular's guidance helps to:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation 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.

FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Program to their FTA regional civil rights officer once every three years. The Title VI Program must be approved by the recipient's board of directors (KTA) prior to submission to FTA. The Title VI reporting requirements are broken down into General Requirements and Guidelines and Requirements and Guidelines for Fixed Route Transit Providers. All FTA recipients must follow General Requirements and Guidelines. The Guidelines for Fixed Route Transit Providers are divided into two categories. There are those requirements that all providers that operate fixed route services must complete and then there are additional requirements for those transit providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area of 200,000 or more in population. KAT, as provider who has more than 50 fixed route vehicles in peak service and is located in the Knoxville Urban Area, which has a population of more than 200,000, must meet all of the requirements.

The Title VI Circular in its Appendix A provides a Title VI Program Checklist to assist the recipient to include all of the required documentation (a copy is included with this Introduction). The KAT Title VI Report is organized in the same order as suggested in the Title VI Program Checklist.

The FTA Title VI Circular underwent significant revisions and was updated on October 1, 2012. The KAT staff first implemented the required changes in the Title VI Report submitted in 2013. As required, new Title VI service standards and policies were developed with public input and approved by the KTA. Also, in 2013, a Major Service Change Policy, a Disparate Impact Policy, and a Disproportionate Burden Policy were developed with public input and adopted by the KTA. KAT staff also updated many of their data sources and Title VI maps and had a consultant prepare an On-Board Survey and Title VI Data Collection Report (one in 2013 and an update in 2018). The survey data and report are valuable resources in helping to evaluate routing decisions and the possible impacts on minority or low-income populations. The KAT staff and the KTA have been following the adopted 2013 standards and policies and using the new data and resources when evaluating the possible Title VI impacts when making routing decisions. Examples of the reports given to the KTA are included in this Report. To date both staff and the KTA are happy with the process put in place and no changes occurred with this Report for 2020.

**Title VI Program Checklist**  
**From APPENDIX A of FTA C 4702.1B**

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program.

**General Requirements (Chapter III from FTA Circular)**

*All recipients must submit:*

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

**Requirements of Transit Providers (Chapter IV from FTA Circular)**

*All Fixed Route Transit Providers must submit:*

- All requirements set out in Chapter III (General Requirements)
- Service standards

- Vehicle load for each mode
- Vehicle headway for each mode
- On time performance for each mode
- Service availability for each mode
- Service policies
  - Transit Amenities for each mode
  - Vehicle Assignment for each mode

*Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:*

- Demographic and service profile maps and charts
- Demographic ridership and travel patterns, collected by surveys
- Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis

# SUMMARY

## TITLE VI REPORT 2020

### Explanation of Sections and Exhibits Included in Report This Summary Follows the Table of Contents

#### **Introduction & Title VI Program Checklist**

A brief introduction is provided. As part of the FTA Title VI Requirements Circular a checklist of what should be included in each agency's Title VI Report is provided. FTA highly encourages agencies to stick to the checklist. This Report follows that checklist.

#### **General Requirements – Section One of Report**

General Requirements are to be done by all transit agencies that utilize FTA funding.

#### **Title VI Notice & Posting Locations**

A standard Title VI notice that states KAT does not discriminate based on race, color or national origin in accordance with the Title VI Act. KAT posts this notice in a variety of locations, including on the website, Knoxville Station, driver training rooms, KAT Magnolia offices, etc.

#### **Title VI Complaint Procedures**

Each agency must provide a copy of their Title VI complaint procedures. A copy is in the Report or the procedures can be found on KAT's website at [www.katbus.com](http://www.katbus.com).

#### **Title VI Complaint Form**

Each agency must provide a copy of their Title VI complaint form. A copy is in the Report or the form can be found on KAT's website at [www.katbus.com](http://www.katbus.com).

#### **List of Transit-Related Title VI Investigations, Complaints, and Lawsuits**

Each agency must list any current Title VI investigations, complaints, and lawsuits. At this time, KAT does not have any Title VI investigations, complaints, or lawsuits.

#### **Public Participation Plan & Information on Outreach Efforts**

Each agency must describe how they seek to engage minorities and persons who are of low income. Each agency must attach their Public Participation Plan with regards to the area's regional Long-Range Transportation Plan and Transportation Improvement Plan (TIP). All federal transportation dollars, including those from FTA must be listed in the regional Long-Range Transportation Plan and TIP. Those documents are the responsibility of the Knoxville Regional Transportation Planning Organization (TPO) in which KAT works in coordination. As the TPO is responsible for the Long-Range Transportation Plan and the TIP, the TPO's public involvement Outreach Plan (2018) is included.

#### **Language Assistance Plan (Limited English Proficiency (LEP) Analysis)**

Each agency is required to develop a Language Assistance Plan to help those persons who do not speak English well. Using Census data and focusing on the KAT Title VI service area (defined as an area ½ mile to either side of a fixed route) 91.1% of the population speaks only English and 8.9% (8.0% last report) speaks "Some Other Language." Of those that speak some other language, those that speak Spanish 4.4% (4.1% last report) are the most prevalent. Of those that



speak Spanish, 51% said they speak English very well and 49% said they speak English less than very well. The Spanish speaking persons who speak English less than very well represent approximately 2.2% of the total population in the KAT Title VI service area.

KAT had an on-board survey conducted in late 2017. That survey found that 2.7% of KAT riders identified themselves as Hispanic. The survey also asked how well riders understood English. Approximately, 4.2% said they did not understand English some, not well, or not at all. The survey did not break this question down by specific language spoken by the rider.

The Language Assistance Plan explains how KAT assists those persons who do not speak English at all or very well. KAT's fixed-route timetables include information in Spanish. KAT can provide interpreter or translator services if needed. KAT works with other agencies and non-profits whose focus is providing assistance to those who may have language difficulties.

#### **Table Depicting Membership of Non-Elected Committees**

Each agency is required to list the racial composition of any non-elected Board or committees. A table for the KTA's membership is included in the Report.

#### **Primary Recipient's Description of How It Monitors Sub-Recipients**

This section is not applicable as KAT does not have any sub-recipients at this time.

#### **Title VI Equity Analysis if the Recipient has Constructed a Facility**

KAT did not have any facility construction projects during the three-year review period.

#### **Copy of Minutes and Resolution Documenting the KTA Approval of Title VI Program**

Once the KTA approves the Title VI Report a copy of the resolution will be placed in this section.

#### **Requirements of Transit Providers – Section Two**

Section Two must be completed by those transit agencies that accept FTA funding and provide fixed-route transit services. KAT meets this requirement. Section Two focuses on the development of required service standards and policies. FTA requires a standard and/or policy for Vehicle Load, Vehicle Headway, One Time Performance, Service Availability, and Transit Amenities. The KTA approved the overall standards and policies in 2013. The KTA reviewed and approved the Monitoring Report at the October 2019 meeting. The Monitoring Report is included in the Title VI Report. Key components of the Monitoring Report are included with this Summary.

#### **Requirements of Providers With 50 or More Buses in Peak Service – Section Three**

This section is required to be completed by those agencies that accept FTA funding and provide fixed-route services and have more than 50 buses in peak service and operate in an urban area of over 200,000 in population. KAT meets this requirement.

- Demographic and Service Profile Maps and Charts
- Map 1 – Base Map of KAT Services
- Map 2 – Demographic Map of KAT Service Area
- Map 3 – KAT Service Area – Low Income Population

Please note: only Maps 1 & 2 are included with this Summary. The other maps can be seen in the full Report online.

Demographic maps and data are included. For KAT's Title VI service area (1/2 mile to either side of a fixed-route), minorities represent approximately 30.3% of the population. For KAT's Title VI service area, approximately 29% of the population is of low income. KAT utilizes these maps when evaluating possible Title VI impacts. The maps show the KAT service area, broken down by Census block groups. Any block group that exceeds the percent Minority (30.3%) or low income (29%) is considered a Title VI area of concern. KAT pays close attention to possible impacts of any proposed service change or fare increase in the identified Title VI areas.

#### **Demographic Ridership and Travel Patterns, Collected by Surveys**

The Title VI regulations now require each transit agency to conduct a Title VI survey of its passengers every five years. KAT had a Title VI survey completed (2017) by a consulting firm. A copy of the survey report and the data are included in the Title VI Report online. KAT staff utilizes this data along with the other demographic maps and tables. KAT staff also utilizes the computer software Remix when analyzing route changes. Remix, has many uses, including allowing easier use of evaluating Census data in areas where potential route changes are being considered.

Each agency is required to utilize the demographic data available to determine which of its fixed-routes are considered Minority routes. A Minority (or low-income) fixed-route is one in which more than 1/3 of its route travels through a Title VI area (block groups). For KAT's service area, Minority block groups are defined as those that exceed the service area's percent Minority population (30.3%). When making route changes or fare increases, KAT must take extra diligence to be sure Minority routes do not unfairly suffer an un-proportionate impact. Included in the Title VI Report is a description of KAT's Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy. The KTA has already approved these policies in 2013. The policies are included with this packet as a review.

#### **Results of Service and/or Fare Equity Analysis Conducted Since Last Title VI Program**

Agencies must provide examples of recent service changes or fare increases and the Title VI considerations that were included in the deliberations. KAT had five service changes (August 2016, January 2017, August 2017, August 2018, January 2019) that required a Title VI analysis. Those Title VI analysis are included in the Report.

MADELINE ROGERO  
MAYOR  
(865)215-2040



CITY OF KNOXVILLE  
KNOXVILLE TRANSPORTATION AUTHORITY

RESOLUTION  
KNOXVILLE TRANSPORTATION AUTHORITY

A Resolution of the Knoxville Transportation Authority  
Verifying consideration, awareness and approval of the  
Results of the KAT Title VI Monitoring Program for 2019.

DOUGLAS LAWYER  
CHAIR  
CHRIS CROUCH  
VICE-CHAIR  
WHITNEY CROWE  
RECORDING SECRETARY  
SANDY BOOHER  
LILIANA BURBANO BONILLA  
MARK HAIRR  
GWEN MCKENZIE  
JIM RICHARDS  
KIMBERLY WATKINS  
DR. WALTER WILLIAMS  
JOHN LAWHORN  
ATTORNEY TO K.T.A.

WHEREAS, Knoxville Area Transit (KAT) is the provider of public transportation in the Knoxville Urbanized Area;  
and

WHEREAS, KAT operates 50 or more fixed route vehicles in peak service and is located in a UZA of 200,000 or  
more in population; and

WHEREAS, FTA Circular 4702.1B requires public transportation providers who meet this threshold to monitor  
their system against certain standards and policies; and

WHEREAS, FTA Circular 4702.1B further requires that the governing board of said public transportation  
provider consider the results of the monitoring program and formally approve them; and

WHEREAS, KAT and TPO staff have developed the required standards and policies and monitored the KAT  
system against them;

NOW, THEREFORE, BE IT RESOLVED BY THE KNOXVILLE TRANSPORTATION AUTHORITY (KTA):

Section 1: The KTA hereby acknowledges its receipt, consideration and approval of the results of the Title VI  
monitoring program

SECTION 2: This resolution shall take effect from and after its passage.

  
\_\_\_\_\_  
Chair, Knoxville Transportation Authority

10/29/19  
\_\_\_\_\_  
Date

# Title VI Service Standards and Service Policies For Knoxville Area Transit (KAT)

## Monitoring Report

October 2019

Vehicle Load Standard: 90% or more of all vehicle loads during any service period should not exceed the assigned vehicle's seated capacity by design.

*Monitoring Report: The attached chart shows that all routes in the KAT system meet the Vehicle Load Standard.*

2) Vehicle Headways Standard: Headways will be broken down by service types as follows, with system-wide average at less than or equal to 40 minutes:

1. Core Route Headways (major routes serving the four main corridors)  $\leq$  an average of 30 minutes
2. Local Route Headways (secondary routes)  $\leq$  an average of 45 minutes
3. Neighborhood Connectors  $\leq$  an average of 60 minutes

*Monitoring Report: The attached chart shows that the system-wide average meets the Vehicle Headways Standard. 4 Local Routes are at 60-minute headways, with the Standard being 45 minutes. Those routes are Route #13-Beaumont (non-minority route); Route #23-Millertown Pike (non-minority route); Route #33-M.L.K.Blvd (minority route); and #42-UT/Ft. Sanders Hospitals(non-minority route). Funding has been received to increase headways on Route 42. These are the only routes that do not meet the average for the individual route standard, with the overall system-wide standard being met.*

3) On-Time Performance Standard: A vehicle is considered on time if it *departs* a scheduled timepoint -0- minutes early and no more than 5 minutes late. KAT's performance objective is 90% on-time or greater, systemwide.

*Monitoring Report: The attached chart shows that the system-wide average meets the On-Time Performance Standard. All individual routes met the standard for this reporting period.*

4) Service Availability Standard: The City of Knoxville will distribute transit service so that 80% of all residents in the KAT service area are within a ½-mile walk of a KAT bus stop.

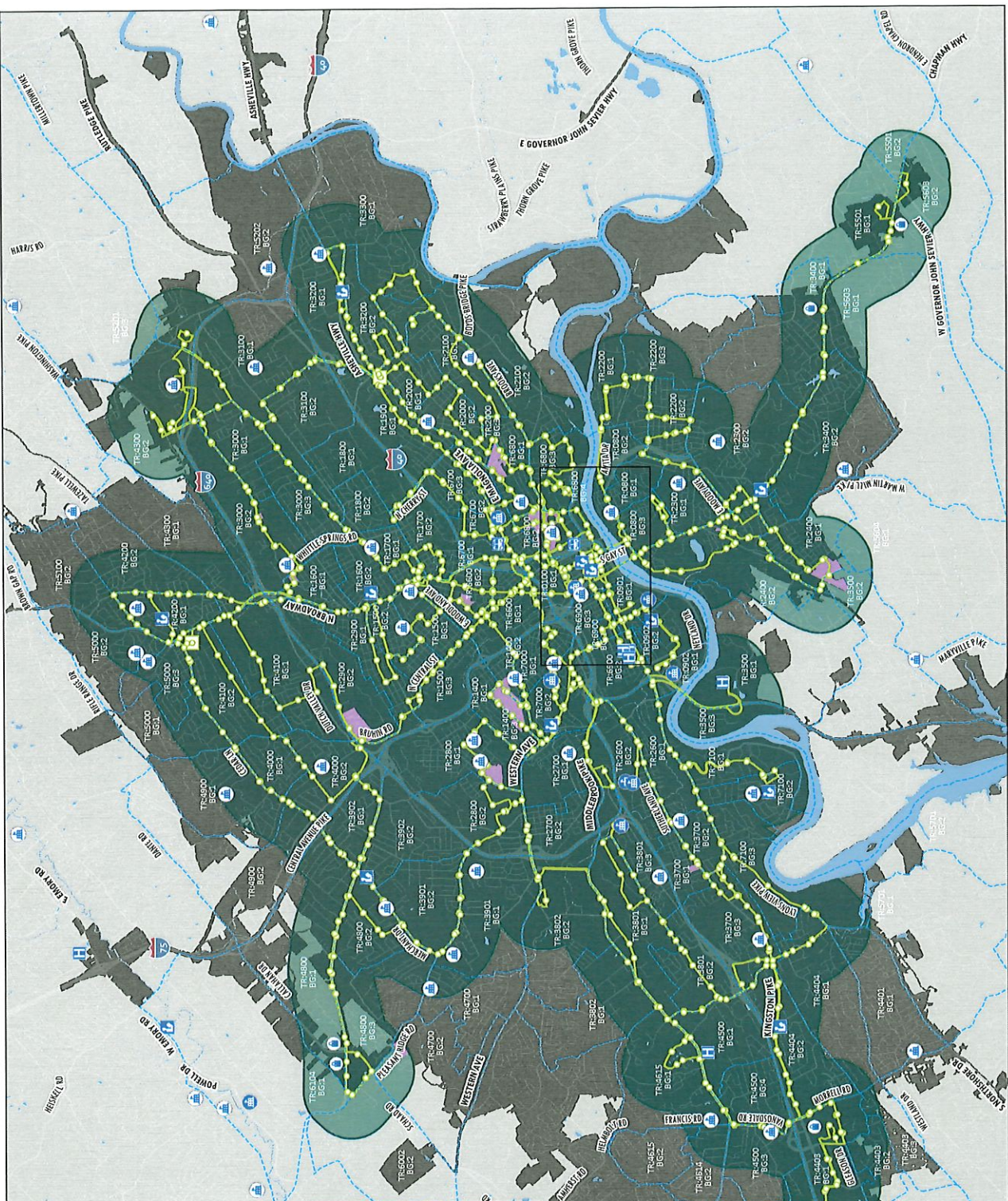
*Monitoring Report: The attached Map 1 from the Title VI Plan shows that the Service Availability Standard is met.*

5) Vehicle Assignment Policy: Vehicles will be assigned to routes in the North, South, East and West quadrants of KAT's service area so that the average age of the fleet serving each quadrant does not exceed the average fleet age by more than 4 years. Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Neighborhood Service Routes and Local Routes with lower ridership may be assigned smaller vehicles than Core Routes. Some routes requiring tight turns on narrow streets may be assigned smaller vehicles able to navigate the route.

*Monitoring Report: The attached chart shows that each quadrant meets the Vehicle Assignment Policy.*

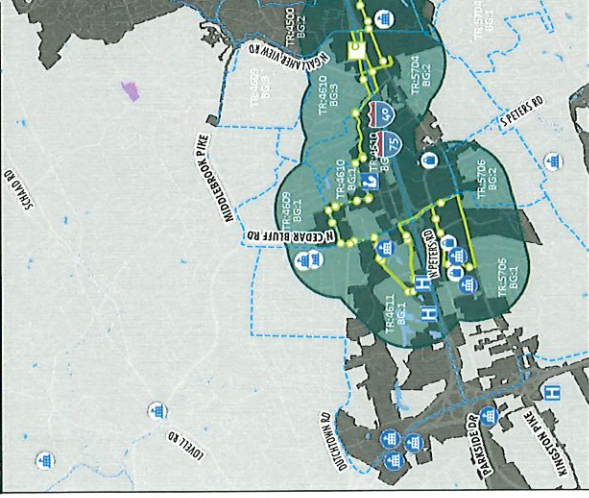
6) Transit Amenities Policy: Stops shall be established at key locations along each route, although exact location of the stop will be based upon the examination of many factors, such as the type of area (i.e commercial, public area, residential), ridership, ROW access and safety. For overall system efficiency, bus stops should generally be placed no less than .2 miles apart. Bus stop amenities, such as benches and shelters, shall be determined based on ridership levels, distribution of other amenities in the area, available right-of-way, adjacent land use, and local agency or private funding. Taking these constraints into account, amenities should be distributed on an equitable basis in all four quadrants of the KAT service area.

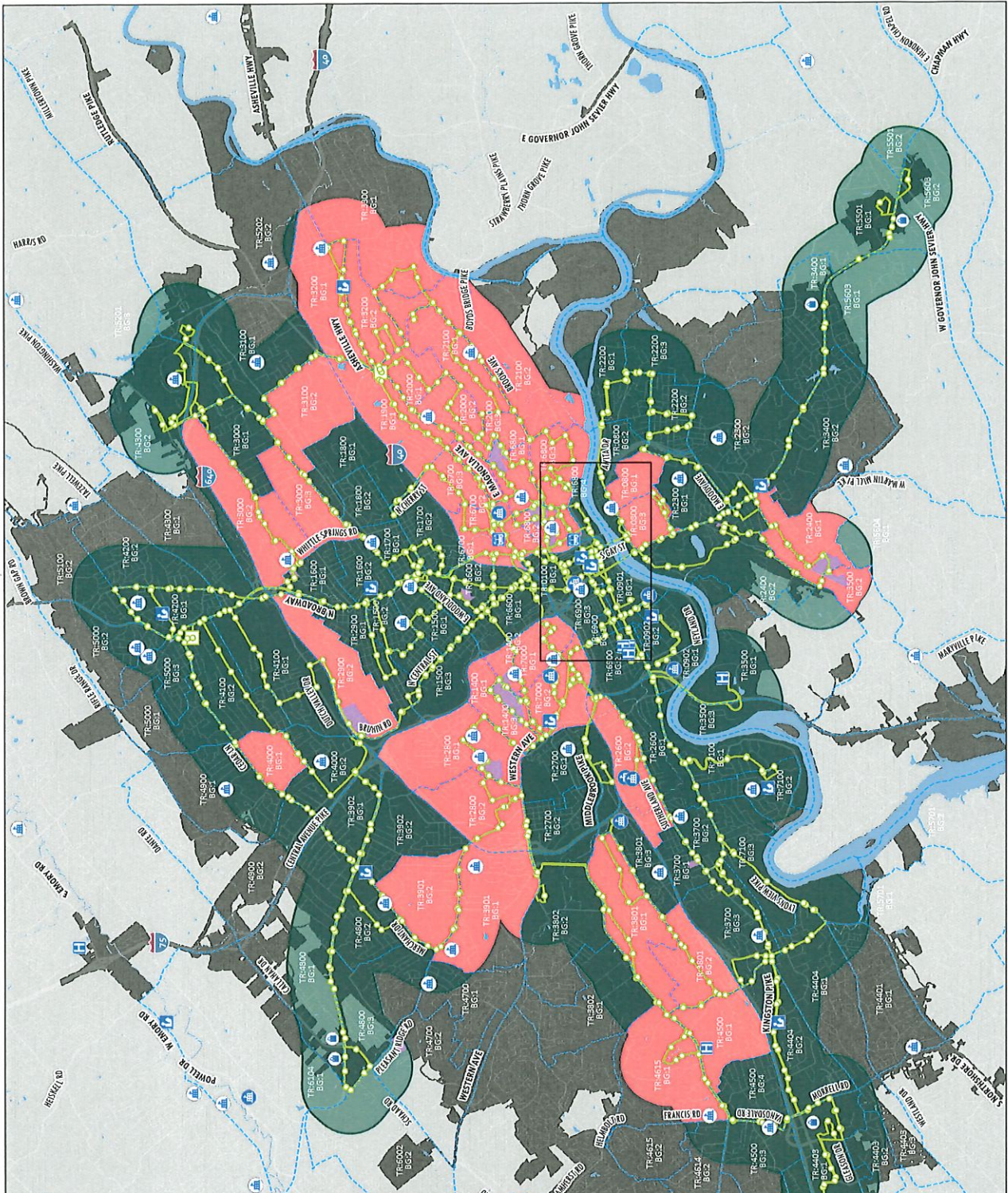
*Monitoring Report: The attached Map 5 from the Title VI Plan shows that the Transit Amenities Policy is met. In the south quadrant, amenities amounts are lower due to low percentage of overall route mileage, For the west quadrant, amenities amounts are higher due to having the highest mileage by quadrant. Amenities in the north are greater due to KAT's participation in the Central Streetscapes project, allowing for 9 additional shelters to be added. Four additional shelters will be added to the east side with the Magnolia Streetscapes project in the next several months.*



**Map 1: KAT Service Area**

- Bus Stop
- Fixed Transit Facility
- Public Schools
- College or University
- Library
- Hospital
- Shopping Center
- Super Stop
- KAT Fixed Route
- 2010 Census Block Group Boundary
- Public Housing
- KAT Half-mile Service Area
- City of Knoxville
- Knox County



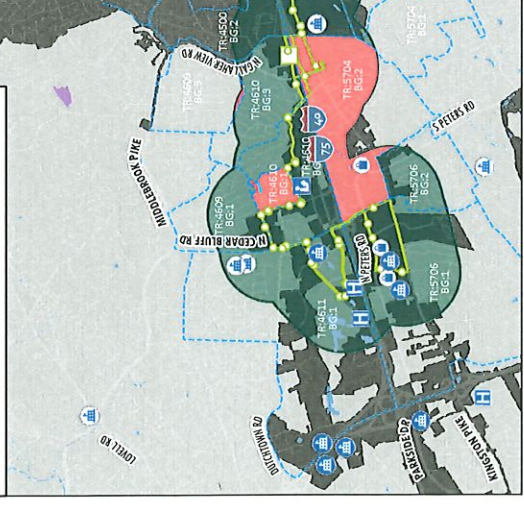


**Map 2: Minority Block Group Population**

- Bus Stop
- Super Stop
- Public Schools
- College or University
- Hospital
- Fixed Transit Facility
- Library
- Shopping Center
- KAT Fixed Route
- 2010 Census Block Group
- Boundary
- Block Group Exceeding Minority Avg of 30.3%
- Public Housing
- KAT Half-mile Service Area
- City of Knoxville
- Knox County



Red shaded block groups are where the percentage of the minority population residing in these areas exceed the average percentage of minority population for the service area as a whole.



## Percent of KAT Fixed Route Mileage within Minority Block Groups

Route	Route Length (Miles)	Miles of Route in Minority Block Groups	Percent of Route in Minority Block Groups
Route 10	9.23	0.23	2.5%
Route 11	22.34	0.88	3.9%
Route 12	20.32	9.93	48.9%
Route 13	11.70	3.74	31.9%
Route 16	11.98	2.25	18.8%
Route 17	12.01	3.56	29.6%
Route 19	16.09	6.02	37.4%
Route 20	17.86	1.50	8.4%
Route 21	12.42	1.29	10.4%
Route 22	14.71	0.71	4.8%
Route 23	15.56	3.30	21.2%
Route 24	16.06	3.16	19.7%
Route 30	8.74	3.93	45.0%
Route 31	11.04	6.50	58.9%
Route 32	11.18	6.15	55.0%
Route 33	17.16	5.82	33.9%
Route 34	14.74	11.00	74.6%
Route 40	14.47	1.45	10.0%
Route 41	14.98	0.89	6.0%
Route 42	7.21	0.00	0.0%
Route 44	4.58	1.36	29.8%
Route 45	12.94	2.69	20.8%
Route 90	43.93	12.49	28.4%
BLUE TROLLEY	2.05	0.62	30.0%
GREEN TROLLEY	2.38	0.25	10.4%
RED TROLLEY	1.35	0.21	15.7%
ORANGE TROLLEY	5.16	0.00	0.0%
<b>Total</b>	<b>352.18</b>	<b>89.93</b>	<b>25.5%</b>

Note: Minority Route is defined as a route in which more than 33% of the route goes through or touches a Minority Block Group.

Source: Knoxville-Knox County Planning

Date: October 2019



**Title VI Service Standards and Service Policies for Knoxville Area Transit**  
**Report Sep-19**

Route	Minority Route? (33% threshold)	Vehicle Load Standard			Vehicle Headways Standard			On Time Performance - September			Vehicle Assignment					
		Minority Route?	% minority (33% threshold)	Average Seated Vehicle Capacity	% of trips exceed seated capacity	Meets standard?	Route type	Standard	Average Headway	Meets Standard?	Standard	Average On Time	Average Fleet Age	Average Assigned Vehicle Age	Meets Standard? Less than 10.9	Average by Quadrant
10			2.5	12	0%		≤ 1:00	1:00	J		90%	6.9	7.5	J	West Quadrant	
11			3.9	32	0%		≤ 0:30	0:22	J		90%	6.9	8.2	J		
12	J		48.9	32	0%		≤ 0:45	0:30	J		90%	6.9	5.9	J		
13			31.9	32	0%		≤ 0:45	1:00	X		90%	6.9	1.0	J		
16			18.8	12	0%		≤ 1:00	1:00	J		90%	6.9	2.0	J		
17			29.6	32	0%		≤ 0:45	0:30	J		90%	6.9	4.5	J		
19	J		37.4	12	0%		≤ 1:00	1:00	J		90%	6.9	3.3	J	6.25	North Quadrant
20			8.4	22	0%		≤ 0:45	0:35	J		90%	6.9	7.7	J		
21			10.4	20	0%		≤ 1:00	1:00	J		90%	6.9	3.3	J		
22			4.8	32	6%		≤ 0:30	0:23	J		90%	6.9	7.5	J		
23			21.2	22	0%		≤ 0:45	1:00	X		90%	6.9	3.2	J		
24			19.7	20	0%		≤ 1:00	1:00	J		90%	6.9	3.3	J	5.94	
30	J		45	20	0%		≤ 1:00	1:00	J		90%	6.9	3.3	J		East Quadrant
31	J		58	38	0%		≤ 0:30	0:23	J		90%	6.9	9.3	J		
32	J		55	22	0%		≤ 0:45	0:32	J		90%	6.9	7.7	J		
33	J		33.9	22	0%		≤ 0:45	0:58	X		90%	6.9	3.2	J		
34	J		74.6	20	0%		≤ 1:00	0:30	J		90%	6.9	5.4	J	6.48	
40			10	20	0%		≤ 1:00	0:30	J		90%	6.9	5.4	J		South Quadrant
41			6	32	0%		≤ 0:30	0:30	J		90%	6.9	5.3	J		
42			0	32	0%		≤ 0:45	1:00	X*		90%	6.9	7.3	J		
44			29.8	38	0%		≤ 0:45	0:15	J		90%	6.9	8.4	J		
45			20.8	20	0%		≤ 1:00	0:30	J		90%	6.9	6.5	J	6.47	
90			28.4	22	0%		≤ 0:45	1:00	J		90%	6.9	6.9	J		
Orange Line			0	38	0%		≤ 0:13	0:15	J		90%	6.9	9.1	J		
Green Line			10.4	38	0%		≤ 0:13	0:10	J		90%	6.9	8.25	J		Central Quadrant
Red Line			15.7	38	0%		≤ 0:13	0:07	J		90%	6.9	8.75	J		
Blue Line			30	38	0%		≤ 0:13	0:08	J		90%	6.9	6.5	J	8.5	
System-wide							≤ 0:40	0:30	J		95%			J		
Core Average							≤ 0:30	0:24	J							
Local Average							≤ 0:45	0:37	J							
Neighborhood Service Average							≤ 1:00	1:00	J							
Trolley Average							≤ 0:15	0:09	J							

J Indicates a Minority Route

X\* Routes with 35% or higher percent minority census tracts are considered minority routes.

X\* Headway improvements funded

**Amenities Locations**

	North	South	East	West	Totals
Shelters	25	9	13	23	70
Benches	7	2	7	10	26
<b>Total Amenities</b>	<b>32</b>	<b>11</b>	<b>20</b>	<b>33</b>	<b>96</b>

33.3% 11.5% 20.8% 34.4%

28.7% 17.0% 22.6% 31.7%

Percent overall ridership  
(September YTD)

**Notes:**

North Route 20 - Central received 9 new shelters with a street redevelopment project (thus the higher percentage)

South: Two new shelters planned for redevelopment of Chapman Highway

East: Four new shelters planned for main East corridor route

West: The system has more geographic area to cover west, so naturally there are more west amenities.

MADELINE ROGERO  
MAYOR  
(865) 215-2040



THE CITY OF KNOXVILLE, TENNESSEE  
KNOXVILLE TRANSPORTATION AUTHORITY

RESOLUTION  
KNOXVILLE TRANSPORTATION AUTHORITY

A Resolution of the Knoxville Transportation Authority Approving a Major Service Change Policy, a Disparate Impact Policy Respecting Minority Populations, and A Disproportionate Burden Policy Respecting Low-Income Populations, pursuant to Federal Transit Administration's Title VI regulations.

RENÉE HOYOS  
CHAIR  
ARCHIE ELLIS  
VICE-CHAIR  
MARY SMITH  
RECORDING SECRETARY  
DANIEL BROWN  
MARK E. HAIRR  
HUBERT SMITH  
KAREN EBERLE  
ESSIE JOHNSON  
KEN MULLER  
JIM RICHARDS  
JOHN LAWHORN  
ATTORNEY TO THE K.T.A.

WHEREAS, the Federal Transit Administration has issued Title VI and Environmental Justice regulations in FTA Circulars C 4702.1B and C 4703.1, respectively; and

WHEREAS, the City of Knoxville/Knoxville Area Transit is required to comply with these regulations; and

WHEREAS; as part of said compliance, the Knoxville Transportation Authority is required to adopt a Major Service Change Policy, a Disparate Impact Policy Respecting Minority Populations, and a Disproportionate Burden Policy Respecting Low-Income Populations; and

WHEREAS; the development of these policies has been undertaken through a public process, as required;

NOW, THEREFORE, BE IT RESOLVED BY THE KNOXVILLE  
TRANSPORTATION AUTHORITY (KTA):

**SECTION 1:** The Knoxville Transportation Authority hereby adopts the  
Major Service Change Policy, the Disparate Impact Policy Respecting Minority  
Populations, and the Disproportionate Burden Policy Respecting Low-Income  
Populations, as attached;

**SECTION 2:** This Resolution shall take effect from and after its passage.

Renee Hoyn  
Chair, Knoxville Transportation Authority

5/23/13  
Date

## **Major Service Change Policy for KAT**

Knoxville Area Transit (KAT) defines a "Major Service Change" as any change that affects 25% or more of the number of transit route miles of a route (either addition or deletion); or 25% or more of the number of transit revenue vehicle miles of a route, computed on a daily basis for the day of the week for which the change is to be made (either addition or deletion). When a change is determined to be a Major Service Change, KAT staff will conduct a Service Equity Analysis, according to the Federal Transit Administration (FTA) Circulars 4702.1B and 4703.1, and present the results of that analysis to the Knoxville Transportation Authority (KTA) to be included when considering approval of said change. A temporary addition or deletion of service (e.g., demonstration projects) or detours are exempt from KAT's definition of a Major Service Change. Should the temporary change of service last longer than twelve (12) months, the service change will be considered a Major Service Change and a Service Equity Analysis will be conducted by KAT staff and considered by the KTA.

**Disparate Impact Policy for KAT  
Respecting Minority Populations**

Prior to adoption by the Knoxville Transportation Authority (KTA) of any Major Service Change (as defined by the Major Service Change Policy), or a fare increase or decrease, Knoxville Area Transit (KAT) staff will perform a Title VI Equity Analysis, according to Federal Transit Administration (FTA) Circulars 4702.1B and 4703.1. If the analysis shows that a minority population is negatively impacted by the proposed action at a rate that is 10 percentage points beyond the system-wide percentage of minority population, then an additional review will take place (Alternatives Evaluation). In that instance, KAT staff would evaluate whether alternatives exist that would serve the same objective(s) but with less negative impact on a minority population. The results of the Equity Analysis and Alternatives Evaluation (if required) will be presented to the KTA to be included when considering approval of said change.

**Disproportionate Burden Policy for KAT  
Respecting Low-Income Populations**

Prior to adoption by the Knoxville Transportation Authority (KTA) of any Major Service Change (as defined by the Major Service Change Policy), or a fare increase or decrease, Knoxville Area Transit (KAT) staff will perform a Title VI Equity Analysis, according to Federal Transit Administration (FTA) Circulars 4702.1B and 4703.1. If the analysis shows that a low-income population is negatively impacted by the proposed action at a rate that is 10 percentage points beyond the system-wide percentage of low-income population, then an additional review will take place (Alternatives Evaluation). In that instance, KAT staff would evaluate whether alternatives exist that would serve the same objective(s) but with less negative impact on a low-income population. The results of the Equity Analysis and Alternatives Evaluation (if required) will be presented to the KTA to be included when considering approval of said change.