



Transportation Equity Caucus




U.S. DOT’s Updated Equity Action Plan: Key Takeaways and Recommendations By the Transportation Equity Caucus (TEC)

The release of the U.S. Department of Transportation's (DOT) updated Equity Action Plan ([EAP](#)) is a crucial milestone in the ongoing effort to promote equity within the transportation sector. This update, a response to Executive Order (EO) [14091](#), reflects the continued commitment from the administration to prioritize equity and repair past harms caused by transportation investments. This iteration builds upon the groundwork laid by EO [13945](#), which mandated the creation of the initial EAP in 2022, and reflects progress made and areas for future improvement as DOT continues to refine its equity approach.

The updated EAP is structured around five pillars, each targeting specific equity outcomes within the transportation sector. These pillars include “Wealth Creation,” “Power of Community,” “Proactive Intervention, Planning and Capacity Building,” “Expanding Access,” and the newly introduced “Institutionalizing Equity.” Each pillar represents a critical component of DOT's equity agenda, but there is still room for refinement and improvement to ensure that equity metrics are robust, measurable, and aligned with the overarching goals of the EAP. Below is a side-by-side comparison of the metrics outlined in both the EAPs.

Table 1: Comparison of the Equity Action Plans: Metrics

Pillars	2022		2023
Wealth Creation	Increase USDOT direct contract dollars to small disadvantaged businesses to an aspirational goal of 20% by FY25.		<p>Increase DOT direct contract dollars to small disadvantaged businesses from 18.2% in FY 2021 to 22% by FY 2026.</p> <p>Reduce # of direct displacements resulting from federal-aid highway projects.</p> <p>Increase # of entities using local and economic hiring preferences on highway and transit projects.</p>
Power of Community	<p>Increase in the # of DOTs and MPOs officially adopting a quantitative Equity Screening component to their STIP & TIP development processes to incorporate community vision and need in project selection and design.</p> <p>Increase in the # of meaningful and representative public participation engagements held by MPOs and State DOTs in the development of STIPs and TIPs in rural and urban communities.</p>		<p>All 50 State DOTs and Top 100 MPOs adopt a quantitative equity screening component to their S/TIP development processes by 2030.</p> <p>90% of DOT funding recipients have a DOT-approved and publicly available Community Participation Plan and Title VI Plan by 2026.</p>

<p>Proactive Intervention, Planning and Capacity Building</p>	<p>Increase in the number of USDOT discretionary grant applicants from disadvantaged communities in urban and rural areas who have never applied for USDOT funding before.</p> <p>Increase in the number of new projects in disadvantaged communities utilizing formula funds added to STIPs & TIPs.</p>		<p>By 2025, increase by 5% the number of DOT discretionary grant applicants from disadvantaged communities who have never applied for DOT funding before.</p> <p>Work to meet the Justice40 goal that 40% of the benefits of certain federal investments flow to transportation disadvantaged communities.</p> <p>Increase the number of new projects in disadvantaged communities utilizing formula funds from Justice40 covered programs.</p> <p>Increase the total federal transit grant dollars announced or allocated for rural or Tribal areas.</p>
<p>Expanding Access</p>	<p>Reduction in transportation travel cost as a percent of income.</p> <p>Reduction in transportation travel time.</p> <p>Increase in access to key destinations, including work, education, grocery stores, health care.</p> <p>Increase in mobility measured by number of trips at the individual level.</p>		<p>Reduce national transportation cost burden by 5%, including transportation travel cost as a percent of income, by FY 2030.</p> <p>Increase safe, affordable, multimodal access to key destinations, including: work, education, grocery stores, health care, affordable housing, and recreation.</p> <p>Reduce the race fatality ratio by population, meaning the national percentage of roadway fatalities per race over the percentage of population per race.</p> <p>Decrease in the number of passengers with disabilities whose wheelchairs are damaged during air travel and who are injured in transfers to/from aircraft.</p>
<p>Institutionalizing Equity (New)</p>			<p>All DOT Operating Administrations (OAs) have adopted an equity analysis process throughout their program offices to increase meaningful public involvement in DOT-conducted virtual engagements by 2024.</p> <p>All DOT OAs have well-resourced Equity Teams led by career members of the Senior Executive Service who champion, coordinate, resource, and implement the OA's equity mission by 2024.</p> <p>DOT staff in key job functions, including and outside civil rights offices, have the core competencies and executive sponsorship to incorporate equity into their daily work by 2024.</p>

The **Wealth Creation** pillar focuses on increasing the amount of money flowing from DOT to disadvantaged businesses. This year, it also includes two new metrics that focus on reducing community displacement caused by highway projects, as well as increasing local employment. The new metrics are a welcome addition, but they still lack measurable outcomes and accountability mechanisms. DOT should incorporate more specific targets into this pillar to achieve EAP goals. For example, the community displacement metric should include a percentage or total number of displacements DOT wants to decrease and a timeline. Doing so makes progress towards these additional goals more measurable and creates accountability.

The **Power of Community** pillar will improve public engagement by giving individuals and communities a greater voice in transportation decisions. This pillar has the most refined metrics with clear quantitative outcomes and timelines that clearly address community needs. However, they can be improved by integrating more qualitative metrics that reflect the lived experiences of the communities most affected by transportation projects. Survey questions that capture underserved communities' attitudes and perceptions about how their priorities are being met and the ease of participation in public engagement activities are examples of qualitative metrics DOT should consider. Qualitative tools used by public agencies, such as LA Metro's Rapid

Equity Assessment [tool](#) and Seattle region's Equity Impact Review [tool](#) are examples of already existing tools that DOT can explore to create qualitative metrics.

The **Proactive Intervention, Planning and Capacity Building** pillar will ensure that historically underserved communities benefit from transportation investments by providing direct, hands-on technical support for transportation projects. This pillar features a mix of both new and modified metrics. The metrics are generally broad in scope and could benefit from being more ambitious, measurable, and timebound. The DOT should also incorporate community-based organization compensation initiatives within this pillar. By providing compensation for participation, along with technical assistance, DOT could encourage greater and more consistent involvement.

The **Expanding Access** pillar aims to increase economic opportunities for underserved communities by improving multimodal transportation options and reducing costs. This pillar introduces new metrics that address fatalities based on race, as well as indicators designed to improve accessibility for individuals with disabilities. While these additions acknowledge the racial nature of fatalities and the need for inclusive accessibility, this pillar could also benefit from clearer measurability and timelines. In addition to encouraging non-car travel options, DOT should implement measures such as tracking the number of bike lanes to improve and build infrastructure that supports these alternatives. There also needs to be a clear plan to address the decades of transportation policy favoring automobile mobility over other options, such as walking and biking.

The introduction of the **Institutionalizing Equity** pillar marks a significant step towards embedding equitable practices within DOT culture. This pillar is aimed at integrating equity into DOT operations, including changing agency decision-making processes and organizational structure. Metrics for this pillar include adopting an equity analysis process and creating dedicated equity teams. This new pillar holds promise in driving meaningful change and ensuring that equity considerations permeate all facets of DOT's work.

Since the release of the initial EAP, DOT has performed key activities to advance equity within the transportation sector. For example, the Federal Highway Administration has begun tracking residential and non-residential displacements. The agency also created the DOT navigator to provide technical assistance and capacity building for grantees. Moreover, DOT released funding for several equity-focused grant programs, such as Reconnecting Communities and Neighborhoods, Thriving Communities, Reconnecting Communities. DOT also created the Advisory Committee on Transportation Equity. These initiatives represent a substantial step towards creating an equitable transportation system, but more work is needed.

Overall, we need to ensure the EAP metrics are robust, community engagement—especially from historically underserved and overburdened communities—is meaningful, and equity principles are operationalized into DOT's processes and culture.

In response to DOT's request for comments on its 2022 EAP, the Transportation Equity Caucus submitted a [letter](#) outlining several key concerns and priorities that should be incorporated in future EAPs and DOT policy:

- The need for DOT to demonstrate a stronger agency-wide commitment to equity.
- Ensuring that the performance metrics in the EAP focus on delivering improved transportation equity outcomes rather than singular issues.
- Actively involving feedback and priorities from environmental justice and frontline communities in the development of the equity action plan.
- Providing a longer comment period (more than 30 days) to allow community-based organizations and environmental justice communities sufficient time to provide feedback.

The updated EAP addressed TEC's comments regarding the institutionalization of equity processes, but it has not incorporated other suggestions. Addressing transportation inequality resulting from decades of harmful investment decisions is a long and complex process. While the current administration has created space for this conversation, it does not guarantee its permanence and accountability. Regulatory agencies like DOT will need to continue efforts such as improving EAPs on a regular basis and publicly reporting data and tracking progress on equity-related metrics to create an equitable transportation system that works for all.

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