

Title VI Analysis - Low Income Bus Fare Proposal

INTRODUCTION

Community Transit is proposing a new fare type for low income bus riders, that if approved will take effect on July 1, 2019. This memorandum provides an evaluation of the proposed new fare type based on Federal Title VI Requirements and Guidelines for Federal Transit Administration Recipients (FTA C 4702.1B), section IV-6, Requirement to Evaluate Service and Fare Changes. This analysis evaluates if the proposed fare change results in disparate or disproportionate impacts to minority and/or low income populations.

Disparate impact is defined as the adverse effect of a practice or standard that is neutral and non-discriminatory in its intention but, nonetheless, disproportionately affects individuals belonging to a particular group based on their race, color or national origin.

Disproportionate impact is defined as a neutral policy or practice that disproportionately affects low-income population more than non-low-income populations.

If any such impacts exceed adopted thresholds, Title VI policy requires justification for the impacts, evaluation of lower impact alternatives and/or mitigation. Community Transit's adopted threshold is 20%. If a fare change impacts Title VI population's 20% more than the non-Title VI populations then additional analysis is required to mitigate the impacts.

PROPOSAL

Establish a low income fare for bus riders who have a household income less than or equal to 200% of the federal poverty level, as set by the US Department of Housing and Urban Development. The new low income would be indexed to Community Transit's existing "Reduced" bus fare that provides a 50% discount from the Adult bus fares. This new fare would be available to both adults and youth meeting the income requirement, and is only available when using the regional electronic fare card, ORCA (one regional card for all).

ANALYSIS & CONCLUSION

The analysis evaluated the change in fare by product type for minority and low income bus riders vs not minority or not low income bus riders. Low income bus riders will receive a benefit that reduces their bus fare by between 30% and 50%. There are no disparate and/or negative disproportionate impacts resulting from this proposed fare change establishing a low income bus fare.

The following attachment provides details on the analysis and results.

ATTACHMENT

DATA SOURCE

Community Transit completed an on-board bus rider survey during October and November 2017. A total of 6,376 responses were collected, with a 1% margin of error at 95% confidence level. Survey questions included age, gender, race, language spoken at home, income level (in ranges) and household size. This data was used to evaluate the proposed low income bus fare.

ANALYSIS

Because this proposal introduces a new fare product for bus riders, the analysis between protected and not-protected populations is by bus fare product type. This new fare is only available with an ORCA card and provides a fare discount on both local and commuter bus services.

Tables 1 and 2 illustrate the proposed fare type, Tables 3 and 4 assess the impact of the of the proposed new fare type, and Tables 5 and 6 illustrate which products are used by protected and not-protected populations.

Table 1: Current and Proposed Fare for Local Bus Service

Fare Product	Adult	Reduced – Disabled & Medicare	Reduced – Low Income	Reduced – Seniors (65+)	Youth
	No Change	No Change	<i>Proposed</i>	No Change	No Change
Cash/HS Ticket ¹	\$2.50	\$1.25	\$1.25	\$1.25	\$1.75
ORCA ² E-Purse	\$2.50	\$1.25	\$1.25	\$1.25	\$1.75
ORCA ² Regional Day Pass	\$8.00	\$4.00	\$4.00	\$4.00	\$4.00
ORCA ² Monthly Pass	\$90.00	\$45.00	\$45.00	\$45.00	\$63.00

¹ HS Ticket – Paper bus tickets are only sold to qualifying Human Service agencies

² ORCA (One Regional Card for All) is the region’s electronic fare payment card

Table 2: Current and Proposed Fare for Commuter Bus Service

Fare Product	Adult	Reduced – Disabled & Medicare	Reduced – Low Income	Reduced – Seniors (65+)	Youth
	No Change	No Change	<i>Proposed</i>	No Change	No Change
Cash/HS Ticket ¹	\$4.25	\$2.00	\$2.00	\$2.00	\$3.00
ORCA ² E-Purse	\$4.25	\$2.00	\$2.00	\$2.00	\$3.00
ORCA ² Regional Day Pass	\$8.00	\$4.00	\$4.00	\$4.00	\$4.00
ORCA ² Monthly Pass	\$153.00	\$72.00	\$72.00	\$72.00	\$108.00

¹ HS Ticket – Paper bus tickets are only sold to qualifying Human Service agencies

² ORCA (One Regional Card for All) is the region’s electronic fare payment

Table 3: Absolute and percent fare change for Local Bus Service fares

LOCAL Bus Service	Adult to Low Income		Youth to Low Income	
	Absolute	Percent	Absolute	Percent
Cash/HS Ticket ¹	-\$1.25	-50%	-\$0.50	-29%
ORCA ² E-Purse	-\$1.25	-50%	-\$0.50	-29%
ORCA ² Regional Day Pass	-\$4.00	-50%	\$0	0%
ORCA ² Monthly Pass	-\$45.00	-50%	-\$18.00	-29%

¹ HS Ticket – Paper bus tickets are only sold to qualifying Human Service agencies

² ORCA (One Regional Card for All) is the region’s electronic fare payment

Table 4: Absolute and percent fare change for Commuter Bus Service

COMMUTER Bus Service	Adult to Low Income		Youth to Low Income	
	Absolute	Percent	Absolute	Percent
Cash/HS Ticket ¹	-\$2.25	-53%	-\$1.00	-33%
ORCA ² E-Purse	-\$2.25	-53%	-\$1.00	-33%
ORCA ² Regional Day Pass	-\$4.00	-50%	\$0	0%
ORCA ² Monthly Pass	-\$81.00	-53%	-\$36.00	-33%

¹ HS Ticket – Paper bus tickets are only sold to qualifying Human Service agencies

² ORCA (One Regional Card for All) is the region’s electronic fare payment

Table 5: Count and Percent by current fare payment for Local Bus Service

Fare Payment	Minority		Low Income		Minority & Low Income		Not-Minority & Not-Low Income	
	#	%	#	%	#	%	#	%
Cash	577.2	28.4%	549.4	29.8%	266.9	34.6%	80.9	19.5%
ORCA ¹ E-Purse	481.3	23.7%	590.4	32.0%	216.0	28.0%	150.9	36.5%
ORCA ¹ Regional Day Pass	70.9	3.5%	26.1	1.4%	14.1	1.8%	8.0	1.9%
ORCA ¹ Monthly Pass	255.7	12.6%	312.2	16.9%	89.2	11.6%	77.6	18.7%
ORCA Ed-Pass/ U-Pass	286.9	14.1%	128.7	7.0%	70.1	9.1%	18.8	4.5%
ORCA ¹ Pass provided by Employer of School	262.5	12.9%	140.8	7.6%	75.4	9.8%	66.0	15.9%
HS Ticket ²	27.2	1.3%	24.6	1.3%	10.7	1.4%	2.6	0.6%
CT Free Ticket	2.7	0.1%	4.5	0.2%	1.6	0.2%	-	0.0%
DART ³ Ticket	0.9	0.0%	0.6	0.0%	-	0.0%	-	0.0%
DART ³ Monthly Pass	1.7	0.1%	0.5	0.0%	0.5	0.1%	-	0.0%
Other	22.5	1.1%	36.1	2.0%	8.8	1.1%	3.2	0.8%
Multiple Payment Methods	41.2	2.0%	29.9	1.6%	17.3	2.2%	6.0	1.4%
All Payments	2,031		1,844		771		414	

¹ ORCA (One Regional Card for All) is the region’s electronic fare payment

² HS Tickets are paper bus tickets sold to Human Service agencies

³ DART is Community Transit’s dial a ride para-transit service: DART fare media is accepted on bus service

Based on the above data, just over 50% of existing low income bus riders and 41% of minority and low income bus riders pay their fare with a retail ORCA product. These customers are the target audience for the proposed low income fare.

Table 6: Count and Percent current fare type payment for Commuter Bus Service

Fare Payment	Minority		Low Income		Minority & Low Income		Not-Minority & Not-Low Income	
	#	%	#	%	#	%	#	%
Cash	8.2	1.7%	8.8	5.3%	4.5	5.3%	1.0	0.2%
ORCA ¹ E-Purse	44.8	9.1%	24.8	14.9%	10.0	11.8%	80.1	14.4%
ORCA ¹ Regional Day Pass	4.4	0.9%	1.3	0.8%	1.3	1.5%	1.5	0.3%
ORCA ¹ Monthly Pass	89.0	18.1%	25.4	15.3%	16.0	18.9%	101.2	18.2%
ORCA Ed-Pass/ U-Pass	115.2	23.5%	51.9	31.2%	26.9	31.7%	84.0	15.1%
ORCA ¹ Pass provided by Employer of School	217.6	44.3%	47.8	28.7%	22.7	26.8%	279.8	50.2%
HS Ticket ²	-	0.0%	-	0.0%	-	0.0%	-	0.0%
CT Free Ticket	-	0.0%	-	0.0%	-	0.0%	-	0.0%
DART ³ Ticket	-	0.0%	-	0.0%	-	0.0%	-	0.0%
DART ³ Monthly Pass	-	0.0%	-	0.0%	-	0.0%	-	0.0%
Other	5.6	1.1%	1.1	0.7%	-	0.0%	1.2	0.2%
Multiple Payment Methods	6.1	1.2%	5.4	3.2%	3.4	4.0%	8.3	1.5%
All Payments	491		166		85		557	

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³ DART is Community Transit's dial a ride para-transit service: DART fare media is accepted on bus service

The majority of minority, low income and minority and low income bus riders who use Community Transit commuter service are receiving bus passes at a discounted rate from their employer, school or university. Of those that are paying their own bus fare, the majority for low income and minority and low income are using retail ORCA products. As stated above, these protected populations are the target audience for the proposed low income fare type.

Table 7: Routes by Bus Service Type and Population

Routes	Minority Only	Low Income Only	Minority & Low Income	Neither Minority or Low Income
Local	107, 111	209, 220, 240, 270, 271, 280	Swift, 101, 105, 106, 109, 112, 113, 115, 116, 119, 120, 130, 196, 201, 202, 222, 230	227, 247
Commuter-South/Everett	413, 810, 855, 860, 880			402, 405, 410, 412, 415, 416, 417, 435, 871
Commuter-North/East				421, 422, 424, 425, 821