



Title VI Fare Increase Analysis:

Office of Inclusion, Diversity, Equity, and Accessibility

April 21, 2023

Executive Summary

The TriMet Board of Directors asked TriMet staff to formalize a fare increase proposal. The first reading of the fare increase proposal will be at the Board's April 26, 2023 meeting, and the Board will vote on the increase at its May 24, 2023 meeting. If approved, this would be TriMet's first fare increase in more than 10 years, and the fare increase would take effect Jan. 1, 2024.

As part of the Title VI Analysis TriMet conducted a public engagement campaign about the fare increase proposal. The engagement campaign ran from Dec. 8, 2022 through Feb. 25, 2023.

Over the course of the outreach and engagement efforts TriMet staff partnered with 66 community based organizations to get the word out about the fare increase proposal and to create spaces to gather feedback. The outreach included in-person, online, and partner led community events.

By working with community TriMet was able to provide outreach across the following languages; Arabic, Burmese, Cambodian, Chinese, Farsi, Filipino, Japanese, Korean, Napoli, Rohingya, Russian, Somali, Spanish, Swahili, Taiwanese, Ukrainian, and Vietnamese. In addition to in-person and online open houses TriMet was able to use a variety of social media and survey tools to gather feedback, including Facebook ads in English and Spanish, LinkedIn, Instagram, Twitter, as well as TriMet & Equity on the Move email newsletters. In total, the events allowed TriMet and partner staff to interact with over 1,550 community members and the surveys gathered almost 5,700 responses.

Staff used the feedback and information gathered from the surveys and open houses, Transit Equity Advisory Committee (TEAC), the Committee on Accessible Transportation (CAT) and TriMet Board Meetings, and TriMet's policy on Fare Changes to help Inform the Title VI Analysis conducted by Espousal Strategies LLC.

Espousal Strategies' analysis found that TriMet's proposed fare increase constituted an approximate 12% increase in fares. TriMet's Fare Policy (updated in 2019) sets a threshold of 10% for Disparate Impact and 10% for Disproportionate Burden. The proposed fare increase would therefore result in both a **disparate impact** on minority riders and a **disproportionate burden** on low-income riders.

To reduce and minimize these impacts, TriMet staff have proposed a series of Mitigations that they will enact in collaboration with community partners to ensure even more riders can benefit from the savings available through the reduced fare program. They will also keep current monthly Fare caps in place across all youth, adult, honored citizen, and paratransit pass programs to ensure that riders who reach their monthly fare cap do not see an increase in the cost of their monthly fares.

Table of Contents

| | |
|---|------|
| Executive Summary | A-1 |
| Title VI Equity Analysis..... | A-2 |
| Overview..... | A-3 |
| Background..... | A-3 |
| Methodology | A-4 |
| Rider categories..... | A-5 |
| Caveat..... | A-5 |
| Disparate Impact Analysis | A-6 |
| Part 1: Rider Typology Analysis | A-6 |
| Part 2: Self-reported Impacts | A-7 |
| Finding | A-7 |
| Disproportionate Burden Analysis..... | A-7 |
| Part 1: Rider Category Analysis | A-8 |
| Part 2: Self-reported Impacts | A-9 |
| Finding | A-9 |
| Addressing Disparate Impacts and Disproportionate Burdens | A-9 |
| Options to minimize impacts may include: | A-10 |
| TriMet Proposed Mitigations | A-12 |
| Current programs and resources..... | A-12 |
| Fare Assistance – Reduced Fares..... | A-12 |
| Formal Proposed Mitigations | A-13 |



Title VI Equity Analysis

Proposed 2024 TriMet Fare Increase

April 2023



Prepared for TriMet by Espousal Strategies, LLC

Overview

The TriMet Board of Directors is considering fare increases that would take effect in January 2024. This document provides an equity analysis of the fare increase proposal, consistent with the Federal Transit Administration (FTA) Title VI Circular 4702.1B¹ and TriMet’s Title VI Program².

Title VI of the Civil Rights Act of 1964 states, “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Background

TriMet’s fares have remained at the same level since 2012. The fare change under consideration would raise fares as shown in Table 1. To summarize, the price of both 2½-Hour tickets and 1-Day passes would increase 12% for all rider types, while monthly and annual pass prices would remain at their current levels.

Table 1: TriMet current fares and proposed changes that would take effect in January 2024

| Fare | Fare Type | Current Price | Proposed New Price | Proposed Increase (\$) | Proposed Increase (%) |
|-----------------------|-----------------|---------------|----------------------|------------------------|-----------------------|
| 2.5-hour Ticket | Adult | \$2.50 | \$2.80 | \$0.30 | 12% |
| | Honored Citizen | \$1.25 | \$1.40 | \$0.15 | 12% |
| | Youth | \$1.25 | \$1.40 | \$0.15 | 12% |
| 1-Day Pass (fare cap) | Adult | \$5.00 | \$5.60 | \$0.60 | 12% |
| | Honored Citizen | \$2.50 | \$2.80 | \$0.30 | 12% |
| | Youth | \$2.50 | \$2.80 | \$0.30 | 12% |
| Month Pass (fare cap) | Adult | \$100 | No increase proposed | | |
| | Honored Citizen | \$28 | | | |
| | Youth | \$28 | | | |
| Annual Pass | Adult | \$1,100 | No increase proposed | | |
| | Honored Citizen | \$308 | | | |
| | Youth | \$308 | | | |

The FTA Title VI Circular requires transit providers considering fare changes to analyze whether potential impacts would adversely and disproportionately affect minority³ and/or low-income

¹ https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf

² <https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf>

³ While “people of color” is generally a more appropriate term than “minority”, this document uses “minority” for consistency with the language of the FTA Title VI Circular.

riders. If they do, it is considered a “disparate impact” for minority riders and a “disproportionate burden” on low-income riders.

TriMet’s Title VI Program implements these requirements by establishing a policy to determine whether the structure of a fare change would cause a potential disparate impact and/or disproportionate burden:

*“For fare changes, a potential disparate impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-minority riders. When minority populations or riders will experience **a 10% (or more) greater adverse effect** than that borne by the non-minority populations or riders, such changes will be considered to have a disparate impact.”*

The disproportionate burden policy is identical but applicable to low- and higher- income riders or populations rather than minority or non-minority, respectively.

Methodology

Data used for this equity analysis came from two sources: the 2022 Planning Future Transit survey and the 2022/23 Fare Increase Proposal survey. Basic information about these surveys is provided in Table 2 and the full text of each is in Attachments A and B.

Table 2: Surveys used for this analysis

| Source | Date conducted | Type | Total responses | Minority responses | Low-income responses |
|--------------------------------|-----------------------|--------|-----------------|--------------------|----------------------|
| Planning Future Transit Survey | March 2022 | Online | 5,093 | 1,414 (32%) | 1,339 (33%) |
| Fare Increase Proposal Survey | Dec. 2022 – Feb. 2023 | Online | 5,688 | 1,379 (27%) | 1,246 (24%) |

Note that not all respondents to surveys answered questions about race and income, so percentages are among those who did.

The relevant data from the 2022 Planning Future Transit survey comes from responses to two questions:

- Q9: How often have you been riding TriMet in the last 12 months? Options:
 - Frequent (I rode almost every day)
 - Regular (I rode several times a week)
 - Occasional (I rode several times a month)
 - Infrequent (I rode less than once a month)
- Q13: How do you typically pay your fare?

The relevant data from the 2022/23 Fare Increase Proposal Survey comes from responses to two questions:

- Q3: How would the proposed fare increase affect you?
- Q4: Would you take fewer trips on TriMet due to the proposed fare increase?

The analysis combines findings from both surveys to estimate the *proportion* of minority and low-income riders who are adversely affected (as compared to non-minority and higher-income counterparts), and the *degree* of these impacts.

Rider categories

Riders will experience different impacts depending on how often they ride and how they pay their fare. They fall into four categories as shown in Table 3; the disparate impact and disproportionate burden analyses use these categories as a framework.

Table 3: Rider categories created for this analysis

| Rider category | Estimated Impact |
|---|--|
| Cash or credit users (Riders paying cash, bank card, or mobile wallet for single 2½-hour or 1-Day tickets, including HOP paper tickets) | Highest These riders would see a 12% increase in monthly transportation costs, and do not benefit from monthly fare caps. |
| Hop users who ride <i>less-than-frequently</i> (As reported in the Planning Future Transit survey) | Second highest These riders would see a 12% increase in monthly transportation costs. Some may get close enough to the monthly cap to decide to take additional trips to reach it. |
| Hop users who ride <i>frequently</i> (As reported in the Planning Future Transit survey) | Little-to-none Monthly transportation costs would not increase for these riders. They may be impacted by needing to spend the full monthly amount in fewer days. |
| Other fare payers (i.e., Employer Pass, School ID) | None |

Caveat

Survey data in general has inherent limitations in terms of analyzing the impacts people may experience from the proposed increase. TriMet’s community engagement efforts are therefore critical to better understanding potential impacts and developing effective strategies to avoid, minimize, or mitigate disparities.

Disparate Impact Analysis

The disparate impact analysis examines whether minority riders would be adversely affected to a greater degree than non-minority riders, as a whole. It contains two types of analysis corresponding to the two surveys.

Part 1: Rider Typology Analysis

As shown in Table 4, the share of minority riders who pay using a method besides Hop is 13 percentage points greater than the share of non-minority riders who do so. **This exceeds the 10% threshold established by TriMet's disparate impact policy.**

Table 4: Cross-tabulation of rider categories with minority and non-minority trips

| Rider category | Level of impact | Pct. of Minority Riders | Pct. of Non-minority Riders | Difference (Minority minus Non-minority) | 10% threshold met? |
|---|-----------------|-------------------------|-----------------------------|--|--------------------|
| Cash or credit users | Highest | 39% | 26% | +13% | Yes |
| Hop users who ride less-than-frequently | Second highest | 33% | 50% | -17% | No |
| Hop users who ride frequently | Little-to-none | 11% | 10% | 1% | No |
| Other fare users | None | 17% | 14% | -3% | No |

Source: TriMet 2022 Planning Future Transit survey

Part 2: Self-reported Impacts

Overall, 74% of respondents to the 2022/23 Fare Increase Proposal Survey said the fare increase would have an impact, including 39% who said that impact would be large. And just over half (54%) of respondents said they would take fewer trips.

Table 5 shows how responses differed between minority and non-minority riders. Minority riders were more likely to expect to be impacted and to report planning to take fewer trips because of the fare increase. The share of minority riders expecting a *large* impact is 47%, compared to 35% of non-minority riders, **exceeding the 10% threshold established by TriMet’s disparate impact policy.**

Table 5: Comparison of responses to Q3 and Q4 of the 2022/23 Fare Increase Survey

| | Minority riders | Non-minority riders | Difference (Minority minus Non-minority) | 10% threshold met? |
|---|-----------------|---------------------|--|--------------------|
| Expecting fare increase to have an impact | 77% | 73% | +4% | No |
| Expecting fare increase to have a <i>large</i> impact | 47% | 35% | +12% | Yes |
| Would take fewer trips due to fare increase | 58% | 53% | +5% | No |

Finding

The proposed fare increase would have a disparate impact on minority riders, as indicated by the following:

1. Minority riders represent a disproportionate share of those who will be most impacted by the increase, i.e., those who pay their fare using a method besides Hop.
2. A greater share of minority riders expect the fare increase to have a large impact than non-minority riders.

Disproportionate Burden Analysis

The disproportionate burden analysis examines whether low-income riders would be adversely affected to a greater degree than higher-income riders, as whole. It contains two types of analysis corresponding to the two surveys.

Part 1: Rider Category Analysis

As shown in Table 6Table 4, the share of low-income riders who pay using a method besides Hop is 9 percentage points greater than the share of higher-income riders who do so. **While this difference does indicate a potential disparity, it does not meet the 10% threshold established by TriMet’s disproportionate burden policy.**

Table 6: Cross-tabulation of rider categories with low- and higher- income riders

| Rider typology | Level of impact | Pct. of Low-income Riders | Pct. of Higher-income Riders | Difference (Low-income minus Higher-income) | 10% threshold met? |
|---|-----------------|---------------------------|------------------------------|---|--------------------|
| Cash or credit users | Highest | 34% | 25% | +9% | No |
| Hop users who ride less-than-frequently | Second highest | 16% | 8% | +8% | No |
| Hop users who ride frequently | Little-to-none | 41% | 44% | -3% | No |
| Other fare users | None | 7% | 19% | -12% | N/A (no impact) |

Source: TriMet 2022 Planning Future Transit survey

Part 2: Self-reported Impacts

Overall, 74% of respondents to the 2022/23 Fare Increase Proposal Survey said the fare increase would have an impact, including 39% who said that impact would be large. And just over half (54%) of respondents said they would take fewer trips.

Table 7 shows how responses differed between low- and higher-income riders. Low-income riders were more likely to expect to be impacted and to report planning to take fewer trips because of the fare increase. Nearly three in five low-income riders surveyed are expecting a *large* impact.

All differences meet the 10% threshold established by TriMet’s disproportionate burden policy.

Table 7: Comparison of responses to Q3 and Q4 of the 2022/23 Fare Increase Survey

| Response to relevant survey questions | Low-income riders | Higher-income riders | Difference (Low-income minus higher-income) | 10% threshold met? |
|---|-------------------|----------------------|---|--------------------|
| Expecting fare increase to have an impact | 84% | 70% | +14% | Yes |
| Expecting fare increase to have a <i>large</i> impact | 57% | 32% | +25% | Yes |
| Would take fewer trips due to fare increase | 63% | 52% | +11% | Yes |

Finding

The proposed fare increase would place a disproportionate burden on low-income riders, as indicated by the following:

1. Low-income riders expect to be impacted more than higher-income riders (including taking fewer trips) to a degree that exceeds TriMet’s disproportionate burden threshold.

Addressing Disparate Impacts and Disproportionate Burdens

Monthly fare caps remaining at their current levels and the existence of the Low-income Fare program are crucial mitigating factors for the potential impacts a fare increase may have. Even so, if the TriMet Board approves the proposed fare increase, the findings of this analysis call for additional efforts to avoid, minimize, or mitigate impacts.

To avoid the impacts identified in this analysis, TriMet would need to choose not to move forward with the fare increase. Further analysis would need to be conducted to determine how service may be affected due to potential revenue shortfalls. That is, if deciding against the fare increase causes future reductions in service, this could have a significant impact on minority and low-income riders – whether this impact results in a disparate impact and/or disproportionate burden would depend on the nature of the service reductions.

Options to minimize impacts may include:

- Reducing the amount of the fare increase
- Boosting awareness of fare capping to encourage riders not currently using Hop to make the transition
- Distribution of pre-loaded cards
- Increased outreach and partnership with community-based organizations
- Advertisements through media likely to reach communities of color
- Other initiatives that the agency has found to be successful in increasing Hop adoption

Mitigation measures should leverage TriMet’s reduced and free fare programs. In addition to seniors, people with disabilities, and youth, TriMet offers the Honored Citizen fare to riders who verify that their household income is below 200% of the federal poverty level (FPL)⁴. Current enrollment in the program is over 50,000, and 43% of those who have provided demographic information are people of color⁵. This aligns with the 44% of Planning Future Transit respondents who were both people of color and below 200% FPL, and is greater than the share of Fare Increase Proposal survey respondents who fell into both demographics (36%).

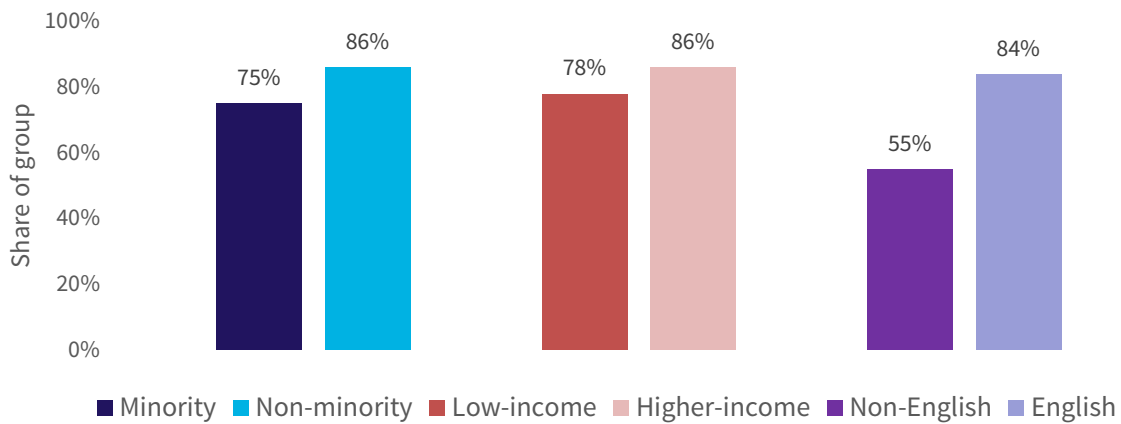
In other words, enrollment in the Low-income Fare program appears to reflect (or exceed) what would be expected given the makeup of TriMet riders, in terms of income levels and minority status.

At the same time, as demonstrated by results of the 2022/23 Fare Increase Proposal Survey, awareness of the program differs by demographic group: as a subset of minority, low-income, respondents who took the survey in a language besides English were less familiar with the program than their counterparts (see Figure 1).

⁴ TriMet’s Title VI definition of low-income is at or below 150% of the federal poverty level. Eligibility for the Low-income Fare was set at a higher income threshold in recognition of the region’s high cost of living.

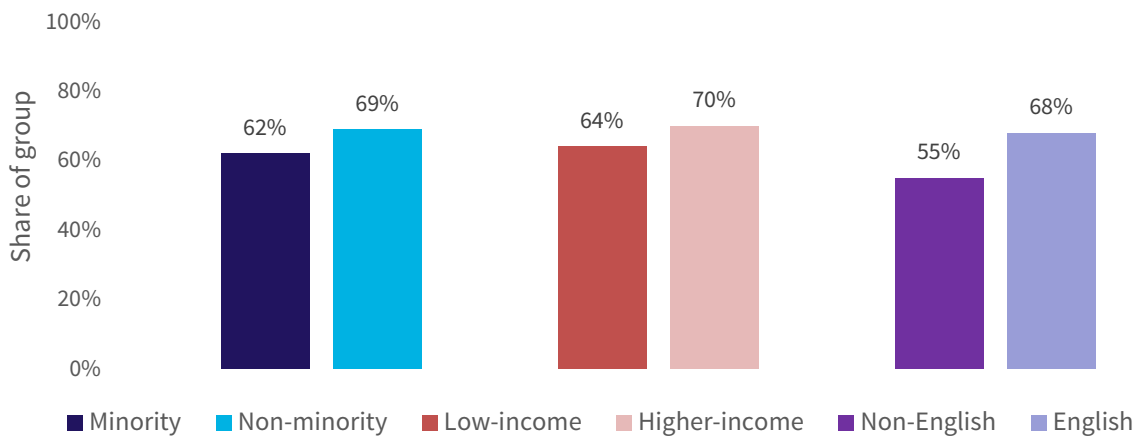
⁵ Among those who voluntarily provided demographic information.

Figure 1: Pct. Aware of Reduced Fares
2022/23 Fare Increase Proposal Survey



A similar pattern exists related to awareness of TriMet’s Fare Assistance and Fare Relief programs that provide free and discounted fares to non-profits and community organizations (see Figure 2).

Figure 2: Pct. Aware of Free and Reduced Fare Programs
2022/23 Fare Increase Proposal Survey



Increasing enrollment in and access to these programs would help reduce disparities identified by this analysis and TriMet’s related community engagement efforts

TriMet Proposed Mitigations

Current programs and resources

Fare Assistance – Reduced Fares

- TriMet understands a fare increase may be challenging for those on low and limited incomes. That’s why TriMet offers reduced fares to qualifying riders, and partners with nonprofits and community-based organizations to get free fares to people who are struggling financially. Learn more at trimet.org/reduced.
- TriMet’s **Honored Citizen** program provides reduced fares for seniors, those with disabilities and those who earn a low income. Learn more at trimet.org/reduced.
 - Honored Citizen Riders pay half the cost of an adult fare (2½ -Hour Ticket and Day Pass) and receive a 72% discount off the cost of an adult monthly pass.
 - Currently, for frequent Honored Citizen riders who use Hop Fastpass™ and ride five days a week using day passes, Hop’s monthly fare capping means they pay just 70 cents a day for the calendar month (\$28 a month divided by 40 boardings per month = \$0.70 per trip).
 - Riders who qualify for the Honored Citizen program based on their income receive a free month of rides when they register for the program or re-enroll annually. The program is open to those who participate in an assistance program or whose household income is less than double the federal poverty level. Learn more at trimet.org/income.
- TriMet’s **Access Transit programs** partner with eligible community-based organizations to distribute fares to those needing help and social services. Since 2015, TriMet has provided those community partners with more than \$12.2 million in fares.
 - The **Fare Assistance** program provides CBOs and nonprofits fares at a reduced cost. Learn more at trimet.org/accesstransit/assistance
 - The **Fare Relief** Program provides CBOs and nonprofits grants of up to \$25,000 in the form of free fares. Learn more at trimet.org/accesstransit/relief
 - **High School Access Transit** programs provide high schools free and discounted fares to distribute to low income youth, including a summer youth pass. Learn more at trimet.org/accesstransit/highschool.
 - **Fares for Seniors, People with Disabilities and Veterans (Pilot)** provides up to \$20,000 in fares to eligible organizations.
- TriMet’s youth fare for those ages 7 through 17 is half the cost of an adult fare. Youth age 6 and under ride free with an accompanying adult.

- **Budgeted Funds for Access Transit/Reduced Fares*:**

| | FY23 Budget (million) | FY 24 & 25 Projected (million) |
|---|--------------------------|--------------------------------------|
| AT: Fare Assistance & Fare Relief programs | \$2.1 | \$2.7 |
| AT: Seniors, People with disabilities, Veterans-pilot | \$0.15 | \$0.15 |
| AT: School Pass Program | \$0.5 | \$0.92 |
| AT: Summer Student Pass Program | \$3.3 | \$2.9 |
| LIF: Reduced fare based on income | \$16 | \$23 |
| LIF: Free month for new enrollees, re-enrolling | \$1.5 | \$1.2 |
| Total | \$23.55 | \$30.87 |

**All of these funds are allocated to low income riders, meaning there is no access to these funds for riders who earn a middle or high income.*

Formal Proposed Mitigations

If the TriMet Board votes to move forward on the proposed fare increase, TriMet staff will work with its partners to ensure the following mitigations are put in place.

1. *No increase in the cost of monthly passes or fare caps for any of fare groups including Honored Citizen (reduced fare), Youth, or Adult.*
2. *Continue to provide a 50% discount for LIFT paratransit rides → half the cost of the federally-approved designated rate.*
3. *Expand access and registration for the Honored Citizen reduced fare.*
4. *Extend program registration for new and renewing participants to 3 years.*
5. *Work to expand the Hop retail network.*