



Title VI Program Update

Presentation to the TriMet Board of Directors
August 10, 2016

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Overview

- Title VI refresher
- Requirements for TriMet
- Program update process
- Updated demographic highlights
- Proposed policy changes
- Next steps



TITLE VI REFRESHER

Title VI of the Civil Rights Act of 1964:

*“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.”*

FTA Title VI Monitoring



**Federal Transit
Administration**

- Review of agency Title VI programs every three years
 - Documentation showing compliance, development and implementation of required policies and plans
- Title VI complaint process
- Performance of Title VI audits



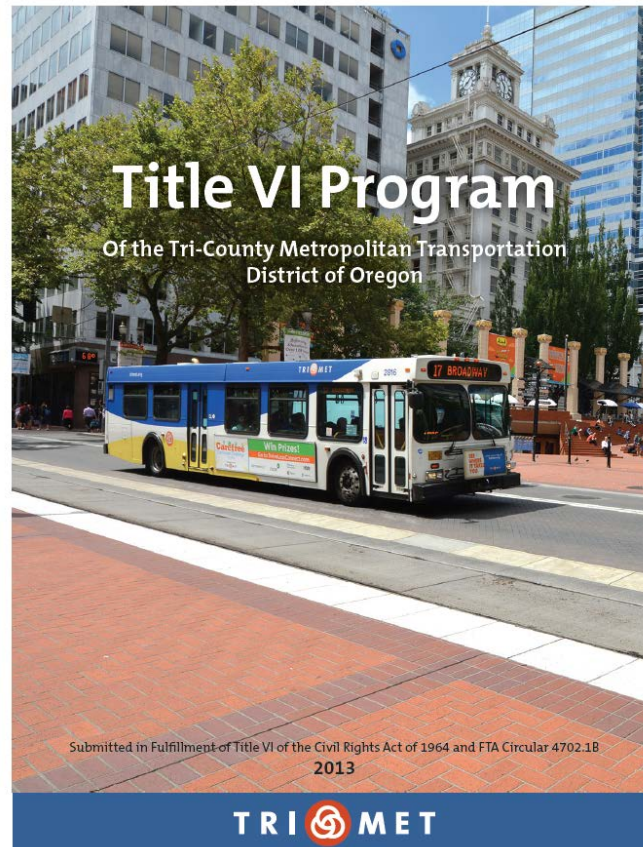
TITLE VI REQUIREMENTS FOR TRIMET

Requirements since 2012

- Adopt policies for equity analysis:
 - Major Service Change
 - Disparate Impact (minority) and Disproportionate Burden (low-income)
- Collect customer demographic and travel pattern data
 - At least every 5 years
- Develop a formal Public Participation Plan
- Provisions for persons with limited English proficiency (LEP)
- Report racial breakdown of District-appointed committees
 - Encourage and solicit minority participation

Program update action required by TriMet Board (Sept. 2016)

- Review and adopt Title VI Program
 - Major Service Change Policy
 - Disparate Impact Policy
 - Disproportionate Burden Policy
 - System-wide Service Standards and Policies



PROGRAM UPDATE PROCESS THUS FAR

Process

- ✓ Engaged internal stakeholders
- ✓ Consulted TEAC on process and proposed policies
- ✓ Held 3 community forums in partnership with non-profit organizations
 - Northwest Family Services, OPAL/APANO, IRCO
- ✓ Conducted on-board fare survey in spring 2016
 - Over 17,000 responses
- ✓ Surveyed community partners
 - Low-income definition, recent impactful changes, methods of ensuring equity
- ✓ Compiled draft report

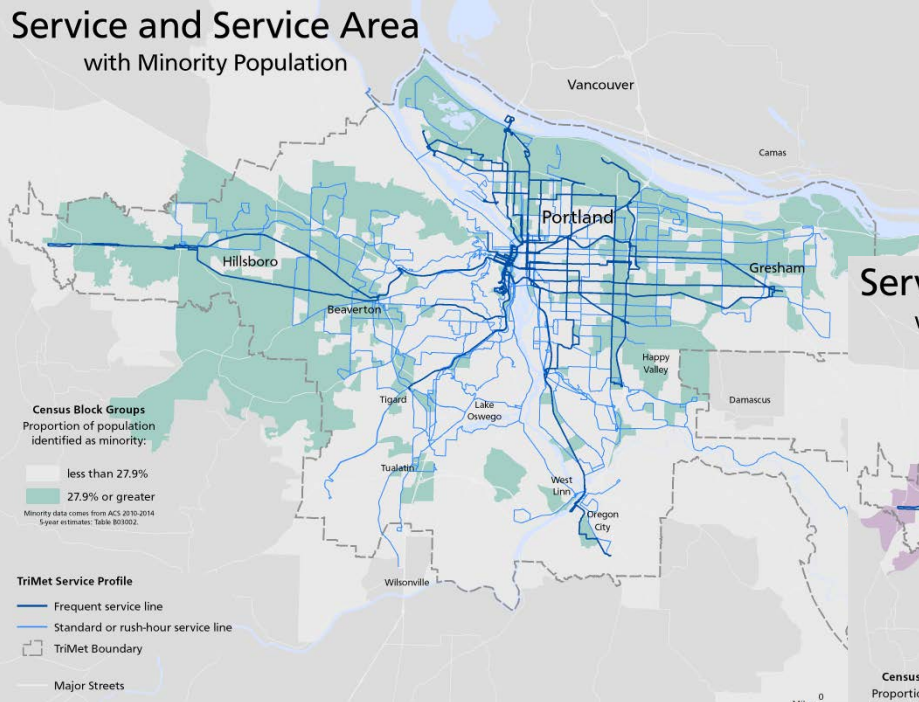
What We Heard

- Fare affordability a major issue for community
- Desire for TriMet to consider a variety of factors when conducting equity analyses (e.g., jobs, education)
- Frequency is crucial
- Weekend and early morning/late night service important for workers with non-traditional hours
- TriMet should be proactive regarding equity (and not just check the Title VI “box”)



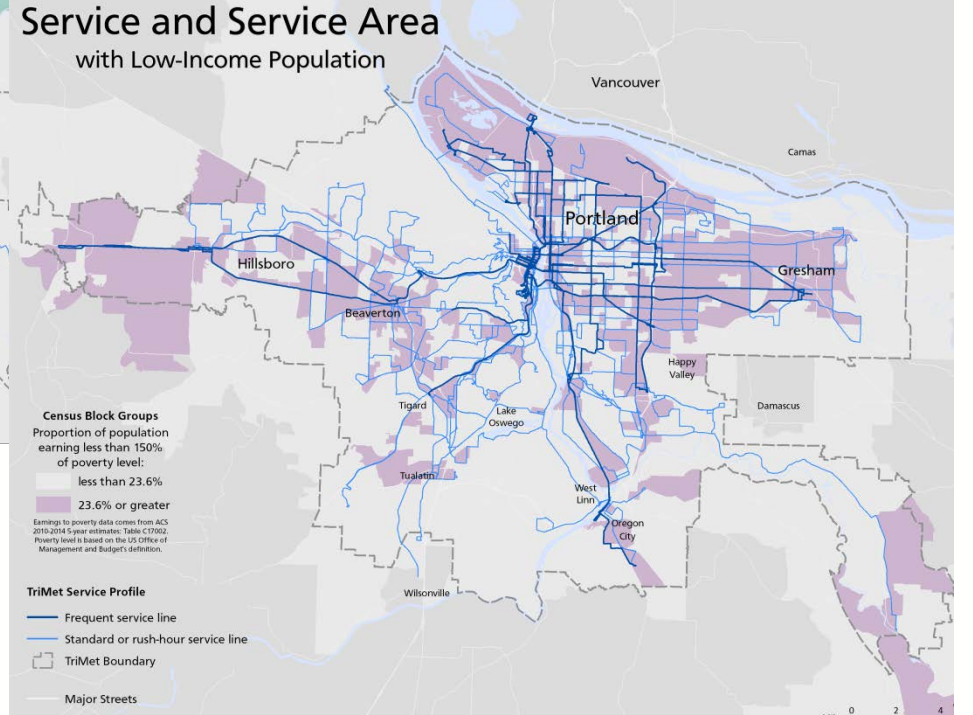
UPDATED DEMOGRAPHICS

Census Data Update



TriMet District minority population: 28%

TriMet District low-income population: 24%



Source: 2010-2014 American Community Survey, US Census Bureau

Low-income Definition

Maintain 150% federal poverty level for Title VI analysis

- Does not preclude a more inclusive definition (e.g., 185% or 200%) for program eligibility

Household Size	150% FPL Income Threshold (2016)
1	\$17,820
2	\$24,030
3	\$30,240
4	\$36,450
5	\$42,660
6	\$48,870

Spring 2016 on-board fare survey

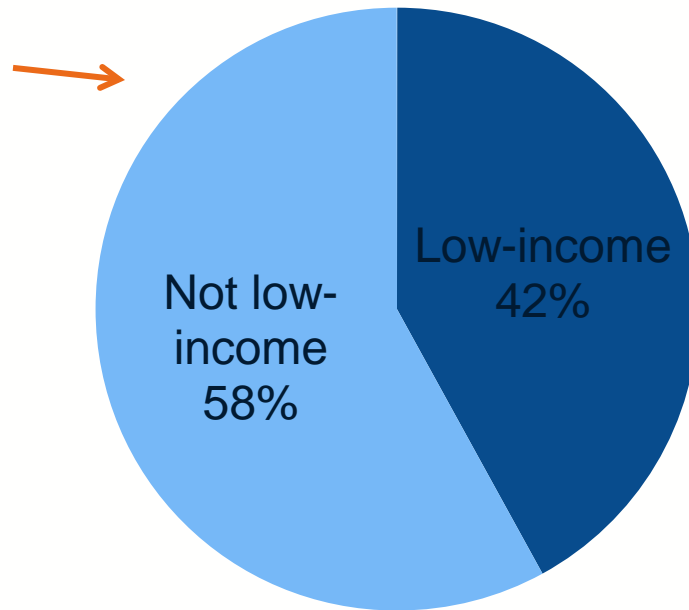
Race/ethnicity	Pct. of trips (weekdays)	Change since 2012 survey
Caucasian/white	63%	-10%
Hispanic/Latino	11%	+4%
Multi-racial/bi-racial	8%	+3%
African American/black	7%	+1%
Asian/Pacific Islander	7%	No change
Native American Indian	2%	No change
Other	2%	N/A

➤ *Total trips taken by minority riders increased from 27% in 2012 to 37% in 2016*

Spring 2016 on-board fare survey

Trips by Income (weekdays)

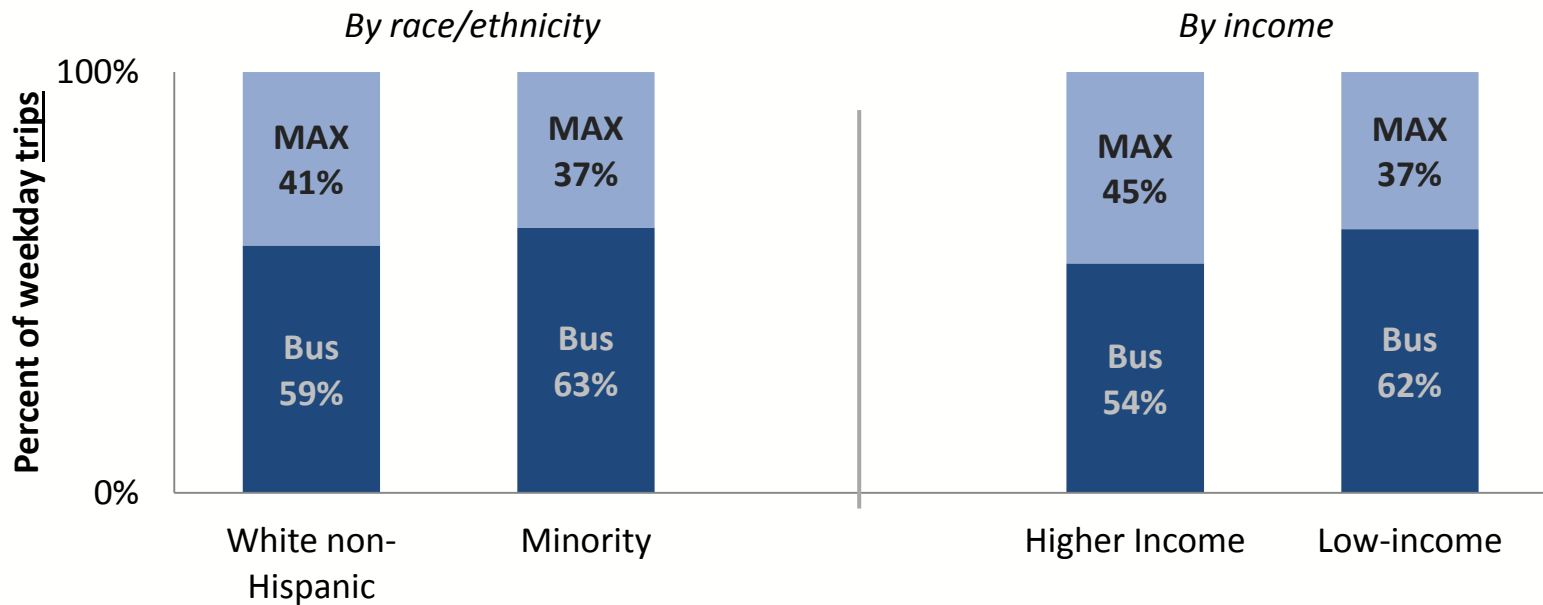
*No change from 2012
survey results*



Note: Low-income defined as at or below 150% federal poverty level

Spring 2016 on-board fare survey

Vehicle Mode (weekday trips)



Note: Trips on WES represent <1% for all groups

Less Frequent Service

Why is this a “Major Service Change”?

Because the frequency of service would be reduced from 4 buses per hour to 3 buses per hour, or by 25%

Service BEFORE



4 buses per hour = every 15 minutes

25%

Service AFTER

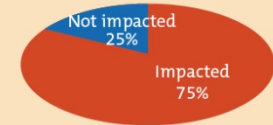
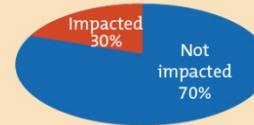


3 buses per hour = every 20 minutes

Testing for “Disproportionate Burden” at the System Level

TriMet district non-low-income population

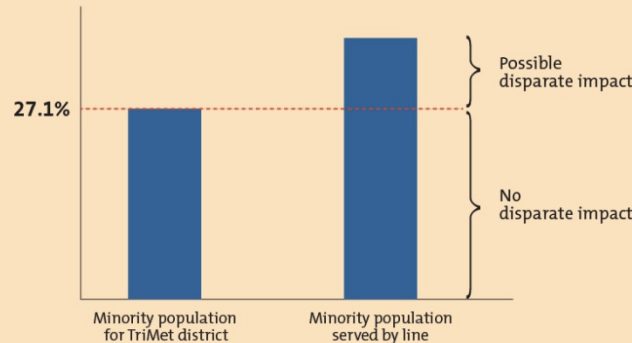
TriMet district low-income population



Disproportionate Burden*

Low-income population impacted (75%) is more than 1.2 times non-low-income population impacted

Testing for “Disparate Impact” on a Single Line



27.1% = minority population within TriMet district

PROPOSED TITLE VI POLICY UPDATES

Major Service Change Policy

Current Policy

- Change of 25% is considered a Major Service Change (equity analysis required)
 - Increase or decrease
 - Applies to route miles, hours of service, frequency

Proposed Policy

- Change of 15% is considered a Major Service Change (equity analysis required)
 - Increase or decrease
 - Applies to route miles, hours of service, frequency
 - Includes changes that reach this threshold over 3 years

Why make these changes?

To better ensure that significant service improvements or reductions are included in equity analyses.

Disparate Impact (Minority) & Disproportionate Burden (Low-income) Policies

Current Policy

- Compare line to district average. Conclusion drawn in any difference.
 - Example: District average minority population = 27%. Major service reduction to a line with 28% minority population in service area considered potential Disparate Impact.

Why make these changes?

Recognizes that data has margins of error, and makes analysis more robust.

Proposed Policy

- Compare line to district average. Difference of 3% considered significant.
 - Example: District average low-income population = 23%. Major service reduction to a line with 26% low-income population in service area considered potential Disproportionate Burden.
- Clarify analysis of service improvements.
- Incorporate consideration of jobs, education, health care into analysis.

Next Steps

- Review comments received on draft Title VI program posted on trimet.org (August – September)
- Board action (September 28, 2016)
- Submit to FTA (September 30, 2016)