

# Equity Analysis Title VI Memorandum: Including Veteran Status as a Qualification for TriMet's Honored Citizen Fare

## Executive Summary

In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.B, TriMet conducts an equity analysis any time fare changes are proposed. This analysis ensures that changes do not unfairly impact people of color or low-income populations. TriMet's mitigation and outreach efforts will prevent any potential negative impacts of this change in form of payment on Honored Citizens. The proposal to add a new program qualification to the Honored Citizen reduced fare calls for such an analysis prior to the TriMet board taking action.

## Background

TriMet will propose the incorporation of a Veteran/military classification to qualify for the current Honored Citizen reduced fare.

With the incorporation of the Reduced Fare Program for people experiencing low-incomes, the introduction of pay-as-you-go fare capping, and incorporation of digital forms of payment, the fare program change will not have any disproportionate impact on populations who are minority and experiencing low-incomes.

Although Veterans do not experience poverty at rates greater than the general public, Veterans representing racial groups other than white—regardless of sex—have greater odds of reporting housing instability and using VHA homeless services.

Millions of veterans also face food insecurity. According to a U.S. Department of Agriculture (USDA) Economic Research Service report, 11.1 percent of veterans between the ages of 18 to 64 lived in households reporting food insecurity.<sup>1</sup>

Veterans also face a higher than average risk of behavioral health issues than the general population, including, depression, anxiety, and PTSD.

## Authority

As a recipient of Federal financial assistance, TriMet must ensure that fare changes comply with Title VI of the Civil Rights Act of 1964, which states:

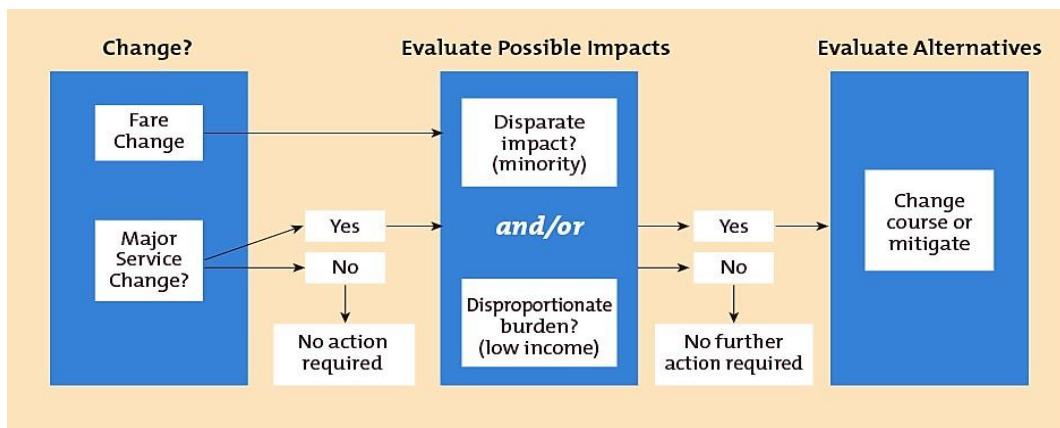
*"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."*

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<sup>1</sup> <https://www.ers.usda.gov/publications/pub-details/?pubid=101268>

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). Due to the interrelated nature of race/ethnicity and income, the Circular instructs transit agencies to consider impacts on low-income populations as well as minority populations; the assessment of potential Title VI issues related to all fare changes<sup>2</sup> is completed through a fare equity analysis. Figure 1 shows the sequence of steps in the equity analysis process.

Figure 1



## Methodology

TriMet’s Title VI Program outlines the agency’s Disparate Impact and Disproportionate Burden policies, as well as the way in which TriMet conducts fare equity analyses. In the case of the proposed fare product addition, the analysis aimed to answer one main question: does adding a new fare category universally disproportionately impact riders who are experiencing low income or who are people of color? To answer this question, staff utilized demographic data culled from the Veteran’s Association.<sup>3</sup>

## Findings (Demographic Data)

### Disparate Impact Analysis (Minority Riders)

The analysis found that minorities and non-minorities are likely to receive the benefit of the HC Veteran program at similar rates, which suggests the potential impacts of the Veteran program are equally borne by minority and non-minority populations.

- Therefore, the proposal to include the Veteran program does not present a Disparate Impact.

### Disproportionate Burden Analysis (Low-income Riders)

TriMet currently offers a program for individuals experiencing low incomes. Veterans currently benefit from enrollment in this income based program. Assessment suggests the potential impacts of the

<sup>2</sup> FTA Circular 4702.1B – Chapter IV-11

<sup>3</sup> [https://www.va.gov/vetdata/veteran\\_population.asp](https://www.va.gov/vetdata/veteran_population.asp)

Veteran program will not be borne by low-income populations.

- Therefore, the proposal to include the HC Veteran program does not present a potential Disproportionate Burden.

## Data

Table 1 shows that in the state of Oregon there are approximately 284,000 veterans.

Table 1

Table 8L: VETPOP2020 LIVING VETERANS BY STATE, RACE/ETHNICITY, GENDER, 2020-2050										
Date	9/30/2020	Numbers from this table should be reported to the nearest 1,000.								
Gender	(All)									
Veterans	Race/Ethnicity									
State	All Veterans	White, alone	Black or African American, alone	American Indian and Alaska Native, alone	Asian, alone	Native Hawaiian and Other Pacific Islander, alone	Some other race, alone	Two or more races	Hispanic or Latino (of any race)	White alone, Not Hispanic or Latino
Oregon	284,141	259,774	4,417	3,179	3,283	737	2,957	9,794	12,054	252,587
Grand Total	284,141	259,774	4,417	3,179	3,283	737	2,957	9,794	12,054	252,587


Of those who do not already qualify for TriMet’s Honored Citizen age based program, there are approximately 51,000 veterans between ages 17-64. TriMet does not currently collect information on the number of veterans currently enrolled in its income based program. Within the state, there are approximately 10,000 active duty and reserve service men and women. These 61,000 military servicemen and women account for 3.5% of the tri-county population.

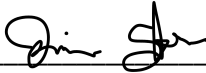
## Mitigation

Although no negative impacts are noted as a result of adding the Veteran classification to qualify for the Honored Citizen reduced fare, TriMet is working with numerous community based organizations to educate and inform them of the new program and how to enroll riders.

## Outreach

TriMet’s community engagement team works closely with representatives from community based organizations that serve the tri-county’s Veteran population. Representatives from these organizations participate in two separate groups organized by community engagement that serve in an advisory capacity for the General Manager: CAT and TEAC. Outreach efforts will focus on reaching veteran groups to enhance enrollment and transit access.

  
 Chief Inclusion, Diversity, Equity, and  
 Access Officer

 09/11/2023  
 Fare Policy and Program Coordinator