Ordinance No. 332 Transfer Policy Change
Fare Equity Analysis
DRAFT
Department of Diversity and Transit Equity
November 25, 2014
I. Background

In response to a community-based effort asking TriMet to increase the length of time riders are allowed to transfer on a single fare, the agency is considering extending the transfer time from two hours to 2 ½ hours. At present riders purchasing a single fare using cash or a prepaid ticket are issued a ticket good for boarding any bus, MAX light rail, or WES commuter rail within two hours from the time shown on that ticket. With the proposed change in the transfer policy the ticket issued to those riders would be good for 2 ½ hours from the time shown on that ticket.

Recent guidance from the Federal Transit Administration (FTA) states that a transfer policy change is considered to be a fare change [Appendix A: FTA letter to TriMet dated July 17, 2014]. As a recipient of Federal financial assistance, TriMet must ensure that any fare change complies 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.

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 fare changes is completed through a fare equity analysis. Figure 1 below shows the sequence of steps and considerations in the equity analysis process.

![Figure 1: Overview of Process for Title VI Equity Analysis](image-url)
II. TriMet Title VI Compliance

In the fall of 2013, TriMet updated its Title VI Program, which received concurrence by the FTA in January 2014. The program outlines agency policies, definitions and procedures for complying with Title VI and performing equity analyses. This includes the agency’s fare change, disparate impact, and disproportionate burden policies.

A. Fare Change Policy
Any proposed fare change – whether in price or fare media – is subject to a fare equity analysis. Recently received guidance from FTA clarifies that this includes proposed changes to transfer policy:

Due to the nexus a transfer policy has with accessing a transit system, FTA views a change to a transfer policy the same as a change to any fare medium. As a result, a transfer policy change requires a fare equity analysis to determine whether a proposed change will result in a disparate impact and/or disproportionate burden. [Appendix A: FTA letter to TriMet dated July 17, 2014]

B. Disparate Impact Policy
Testing for “disparate impact” evaluates effects on minority riders or populations as compared to non-minority riders or populations. “Minority” is defined as all persons who identify as being part of racial/ethnic groups other than white, non-Hispanic.

The FTA’s guidance that transfer policy changes fall under the “fare change” definition came after the agency’s 2013 Title VI Program had received concurrence. Because of this, TriMet’s adopted disparate impact policy for fare changes does not prescribe a process for analysis of transfer time changes. Rather, the policy states:

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...Differences in the use of fare options between minority populations and other populations include all such differences that are documented as statistically significant at the 95 percent confidence level. [Appendix B: TriMet 2013 Title VI Program, pg. 28]

Using the available data, TriMet staff assessed the potential impact of the proposed change in transfer policy using methods and analyses consistent with equity evaluations of changes in fare pricing. The agency’s most recent fare survey (conducted in fall 2012 and attached as Appendix C) is informative about fare payment patterns, transfer activity, and how those compare between trips taken by minority and non-minority riders.

Given the proposal to increase the transfer window from two hours to 2 ½ hours, this analysis evaluates the differences between minority and non-minority trips in terms of single fare (cash or ticket) usage – since
transfer times are relevant only for those purchasing single fares – as well as utilization of transfers and round trip patterns. An underlying assumption is that the greater the number of transfers in a trip the longer it will take to complete, and thus more likely that the person taking the trip would benefit from the extra thirty minutes to make his or her final boarding. In this context, there may be potential for a disparate impact if minority riders use single fares at significantly lower rates than non-minority riders, and/or if impacted minority riders transfer less often than impacted non-minority riders. This is because in either case minority riders would be less likely to benefit from the policy change.

C. Disproportionate Burden Policy
Testing for “disproportionate burden” evaluates potential effects on low-income populations, defined as at or below 150% of the federal poverty level. The analysis methods undertaken here are the same as those used to determine potential disparate impacts, but by comparing low-income and higher income populations rather than minority and non-minority populations.

III. TriMet Ordinance 332

A. Description of Change
Currently, TriMet riders who purchase single fares with cash or a prepaid ticket receive two hours after the time of boarding or ticket validation to transfer to another route. These riders, who comprise 27% of weekday trips and 37% of weekend trips on TriMet, would receive thirty more minutes to transfer under Ordinance No. 332, bringing the total time allowed to complete their final boarding to 2 ½ hours. The policy change would not affect the price of fares and would apply regardless of single fare type paid (whether Adult, Honored Citizen, or Youth). Riders using other fare types (1-Day, 7-Day, 14-Day, 30-Day/Monthly passes) would be unaffected by the change.

The 2012 TriMet on-board fare survey collected fare payment and demographic data that can be used to conduct a fare equity analysis as described in sections II-B and II-C of this document.

B. Disparate Impact Analysis

Single cash/ticket fare usage
The first level of the disparate impact analysis examines the minority status of single cash/ticket fare payers because single fare payers are the only riders potentially impacted by the transfer policy change. The pie charts on the next page compare the minority/non-minority split for single fares and all fares on weekdays (Figure 2) and weekends (Figure 3).

If the minority status of single fare payers were in proportion to minority status of overall ridership, percentages would be similar for the pairs of charts. As shown, minority riders comprise about 29% of single fare payers and 27% of all fare payers on weekdays. This is not a “statistically significant” difference, which is the policy standard set forth in the agency’s disparate impact policy. This means that weekday minority riders
appear to use single fares in proportion to the amount that they ride TriMet. Analysis of weekend fares had similar results, with minority riders comprising 31% of both system trips and single cash/ticket fare trips.

**Figure 2:** Minority and non-minority riders use single fares in proportion to their ridership on weekdays.
TriMet 2012 Fare Survey

[Minority/non-minority split for single fare trips on weekdays]

*Minority 29%, Non-minority 71%*

**Figure 3:** Minority and non-minority riders use single fares in proportion to their ridership on weekends.
TriMet 2012 Fare Survey

[Minority/non-minority split for single fare trips on weekends]

*Minority 31%, Non-minority 69%*

**Transfer activity**
Table 1 (pg. 6) and Figures 4 and 5 (pgs. 6-7) show the distribution of trips for minority and non-minority riders in terms of number of transfers made for both weekday and weekend trips\(^1\). For both groups, about

\(^1\) The data does not indicate length of trips. Therefore, the analysis requires an inference that the more transfers involved, the longer the trip.
26-30% of trips include one or more transfers, whether on weekdays or weekends. None of the differences between groups were statistically significant; the differences in percentages are most likely due to chance, and do not signify an actual difference in trip patterns.

Recognizing the overall assumption that a greater number of transfers generally means a longer time to complete a trip, the similar patterns of transfer usage between minority and non-minority riders indicates that each population is as likely as the other to benefit from extending the transfer time window.

**Table 1: Transfer activity by minority/non-minority status**

<table>
<thead>
<tr>
<th></th>
<th>Weekday Trips</th>
<th>Weekend Trips</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Non-minority n=899</td>
<td>Minority n=373</td>
</tr>
<tr>
<td>One transfer</td>
<td>24%</td>
<td>27%</td>
</tr>
<tr>
<td>Two transfers</td>
<td>3%</td>
<td>3%</td>
</tr>
<tr>
<td>Three or more transfers</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Subtotal – trips with transfer</td>
<td>27%</td>
<td>30%</td>
</tr>
<tr>
<td>No transfer</td>
<td>73%</td>
<td>69%</td>
</tr>
<tr>
<td>Total(^2)</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

\(^1\)Table includes only single fare cash/ticket payers because only single fares would be impacted by the change

\(^2\)Percentages that do not add up to 100% are due to rounding

No statistically significant differences found (at the 95% confidence level) between minority and non-minority trips.

**Figure 4: WEEKDAY transfer activity comparison by minority status**

TriMet 2012 Fare Survey

*Note: A negligible amount (0.2%) of all trips surveyed required 3+ transfers*
Round trips on single fares
An additional consideration in terms of the equity of increased transfer time is riders’ ability to make a round trip on a single fare; those advocating for increased transfer time have commonly stated that this policy change could benefit transit dependent riders, particularly minority and low-income riders, in this way. While the intent of TriMet’s transfer policy is to allow for sufficient time to make a one-way trip within the service district, the agency does not prohibit round-tripping on a single fare, so long as the rider’s final boarding occurs before the expiration time on his or her transfer ticket.

Table 2 below and Figure 6 (pg. 8) compare how minority and non-minority riders answered the following question on the 2012 TriMet Fare Survey: “Is your single fare payment being used for a one-way or a round-trip?” About one-quarter of single cash/ticket fares paid were reportedly used to make a round-trip. This figure is similar between populations as well as between weekday and weekend trips. In other words, when looking at trips made by minority and non-minority riders, the survey results do not signify an actual difference in terms of how often single fares are used to make a round-trip; both groups seem equally likely to realize this benefit.

Table 2: Is your single fare payment being used for a one-way or a round-trip?
Minority and non-minority comparison
TriMet 2012 Fare Survey

<table>
<thead>
<tr>
<th>One-way or Round-trip</th>
<th>Weekday Trips</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Non-minority</td>
<td>Minority</td>
<td>Non-minority</td>
<td>Minority</td>
</tr>
<tr>
<td></td>
<td>n=898</td>
<td>n=372</td>
<td>n=845</td>
<td>n=379</td>
</tr>
<tr>
<td>One-way</td>
<td>77%</td>
<td>75%</td>
<td>74%</td>
<td>75%</td>
</tr>
<tr>
<td>Round-trip</td>
<td>23%</td>
<td>25%</td>
<td>26%</td>
<td>25%</td>
</tr>
<tr>
<td>Total</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>
Thus, in the context of this change in transfer policy, the available data and the analysis find no potential disparate impact on minority riders.

C. Disproportionate Burden Analysis

Single cash/ticket fare usage
The first level of the disproportionate burden analysis examines the income status of single cash/ticket fare payers. The pie charts on the next page compare the low-income/higher income split for single fares and all fares on weekdays (Figure 7) and weekends (Figure 8).

If the income status of single fare payers were in proportion to income status of overall ridership, percentages would be similar for the pairs of charts. As shown, low-income riders comprise about 50% of single fare payers and 42% of all fare payers/trips on weekdays. This is a statistically significant difference, meaning that weekday low-income riders use single fares more commonly than expected given their ridership, and are therefore more likely to be impacted (positively) by the proposed policy change. This was not the case for weekends, however, as no statistically significant difference was found between the 60% of single fares that are paid by low-income riders and the 57% of fares overall paid by low-income riders.
Figure 7: Low-income riders are over-represented amongst single fare payers on weekdays.
TriMet 2012 Fare Survey

Income split for single cash/ticket fare trips
Weekdays

Income split for all fares, all trips
Weekdays

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

Figure 8: Low and higher income riders use single fares in proportion to their ridership on weekends.
TriMet 2012 Fare Survey

Income split for single cash/ticket fare trips
Weekends

Income split for all fares, all trips
Weekends

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

Transfer activity
Table 3 (pg. 10) and Figures 9 and 10 (pgs. 10-11) show the distribution of trips for low-income and higher income riders in terms of number of transfers made for both weekday and weekend trips. Low-income trips are more likely to include a transfer than trips made by higher income riders, and this is true on both
weekdays and weekends. On weekdays about one-quarter of trips made by higher income riders include at least one transfer, whereas one-third of low-income weekday trips do. Differences are slightly lower for weekends, but in both cases the differences meet the standard of statistical significance. Recognizing the overall assumption that a greater number of transfers generally means a longer time to complete a trip, low-income riders appear more likely to benefit from the transfer time increase because their trips more often include at least one transfer than trips made by higher income riders.

Table 3: Transfer activity by income status
2012 TriMet Fare Survey

<table>
<thead>
<tr>
<th>Number of transfers</th>
<th>Weekday Trips</th>
<th>Weekday Trips</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Higher income</td>
<td>Low-income</td>
</tr>
<tr>
<td>One transfer</td>
<td>22%</td>
<td>29%</td>
</tr>
<tr>
<td>Two transfers</td>
<td>3%</td>
<td>3%</td>
</tr>
<tr>
<td>Three or more transfers</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Subtotal – pct. trips with transfer</td>
<td>25%</td>
<td>32%</td>
</tr>
<tr>
<td>No transfer</td>
<td>75%</td>
<td>67%</td>
</tr>
<tr>
<td>Total</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

1Table includes only single fare cash/ticket payers because only single fares would be impacted by the change. Low-income defined as at or below 150% federal poverty level.
2Percentages that do not add up to 100% are due to rounding

**Bold** indicates a statistically significant difference (at the 95% confidence level) between higher income and low-income trips.

![Figure 9: WEEKDAY transfer activity comparison by income status](chart.png)

*Note: A negligible amount (0.2%) of all trips surveyed required 3+ transfers*
Round trips on single fares

As with the analysis of impact on minority riders, an additional equity consideration is riders’ ability to make a round trip on a single fare; those advocating for increased transfer time have commonly stated that this policy change could benefit transit dependent riders, particularly minority and low-income riders, in this way. While the intent of TriMet’s transfer policy is to allow for sufficient time to make a one-way within the District, the agency does not prohibit round-tripping on a single fare, so long as the rider’s final boarding occurs before the expiration time on his or her transfer ticket.

Table 4 and Figure 11 (pg. 12) compare how low-income and higher income riders answered the following question on the 2012 TriMet Fare Survey: “Is your single fare payment being used for a one-way or a round-trip?” On weekdays, low-income riders are more likely than higher income riders to use single fares to make a round-trip on TriMet. On the other hand, no statistically significant difference exists between low and higher income trips on the weekends – both groups use single fares for round-trips about one-quarter of the time on the weekends.

Table 4: Is your single fare payment being used for a one-way or a round-trip?  
Low-income and higher income comparison  
TriMet 2012 Fare Survey

<table>
<thead>
<tr>
<th>One-way or Round Trip</th>
<th>Weekday Trips</th>
<th></th>
<th>Weekend Trips</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Higher income</td>
<td>Low-income</td>
<td>Higher income</td>
</tr>
<tr>
<td>One-way</td>
<td>82%</td>
<td>71%</td>
<td>76%</td>
</tr>
<tr>
<td>Round-trip</td>
<td>18%</td>
<td>29%</td>
<td>24%</td>
</tr>
<tr>
<td>Total</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

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

**Bold** = statistically significant difference (at a 95% confidence level) between higher income and low-income
Thus, in the context of this change in transfer policy, the available data and the analysis find no potential disproportionate burden on low-income riders.

IV. Fare Equity Analysis Conclusions

This analysis has aimed to ensure that minority and low-income TriMet riders would not be limited or denied the benefits of an increase in transfer time from two hours to 2 ½ hours. The analysis concludes:

- **No potential disparate impact** on minority riders associated with increasing the transfer time window. Minority and non-minority riders are equally likely to benefit from the policy change because both groups:
  - Use single cash/ticket fares in proportion to their ridership;
  - Have similar transfer activity, and;
  - Utilize single fares to make round trips at similar rates.

- **No potential disproportionate burden** on low-income riders associated with increasing the transfer time window. Low-income riders are more likely to benefit from the policy change in comparison to higher income riders because low-income trips:
  - Comprise a higher-than-expected proportion of single cash/ticket fares;
  - Are more likely to include a transfer, and;
  - Are equally or more likely to involve using a single fare for a round trip.

![Figure 11: Roundtripping on a single fare by income status](TriMet 2012 Fare Survey)

*Low-income defined as at or below 150% federal poverty level*
APPENDIX A: FTA letter to TriMet dated July 17, 2014
July 17, 2014

Neil S. McFarlane
General Manager
TriMet
1800 SW 1st Avenue, Suite 300
Portland, OR 97201

Re: FTA Complaint No. 2014-0048

Dear Mr. McFarlane:

This letter responds to the complaint filed against Tri-County Metropolitan Transportation District of Oregon (TriMet) by Organizing People and Activating Leaders (OPAL) and the Center for Intercultural Organizing (ICO). The Federal Transit Administration (FTA) Office of Civil Rights is responsible for ensuring that providers of public transportation are in compliance with Title VI of the Civil Rights Act of 1964, as implemented by the U.S. Department of Transportation (DOT) at 49 CFR Part 21; FTA Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”; and Executive Order 13166, "Improving Access to Services to Persons with Limited English Proficiency (LEP)."

In the FTA complaint investigation process, we analyze allegations for possible Title VI deficiencies by the transit provider. If deficiencies are identified, they are presented to the transit provider to correct them within a predetermined timeframe. If FTA cannot resolve the apparent violations of Title VI or the DOT Title VI regulations by voluntary means, formal enforcement proceedings may be initiated against the public transportation provider, which may result in the suspension or termination of Federal funds. FTA also may refer the matter to the U.S. Department of Justice for enforcement.

Allegations

The complaint alleges that TriMet failed to comply with FTA’s Title VI Circular, when TriMet implemented a change to its transfer policy and did not conduct a fare equity analysis. The complainants believe that TriMet’s transfer policy not only failed to comply with FTA’s Title VI Circular, but the transfer change also resulted in a disparate impact.

Facts

According to the information provided by the complainants and TriMet, a transfer change occurred on June 13, 2012. Prior to implementing the transfer change policy, TriMet sought technical assistance from FTA on a proposed fare change and major service change. In this request, TriMet mentioned to FTA that it was also going to standardize its transfer policy. Consequently, TriMet adopted a standardized two hour transfer policy for all modes of transit service and days of the week. TriMet worked with the complainants to determine whether the two hour transfer window could be extended to three hours, and as of December 11, 2013, there was a proposal to extend the transfer policy to two and a half hours.
Nevertheless, the complainants filed a Title VI complaint regarding the transfer policy on December 27, 2013 with FTA.

**Analysis**

For purposes of corrective actions, the relevant FTA Title VI Circular is Circular 4702.1B, which became effective on October 1, 2012. In making a determination, FTA recognizes that TriMet is currently considering new changes to the transfer policy at the center of this complaint.

**Timeliness**

In TriMet's response, the issue of timeliness was raised. Per DOT Title VI Regulations, "[a]ny person who believes himself or any specific class of persons to be subjected to discrimination prohibited by this part may . . . file with the Secretary a written complaint. A complaint must be filed not later than 180 days after the date of the alleged discrimination." (49 CFR § 21.11(b)) Upon review of the complainants' and TriMet's material, FTA does agree that the complaint was raised outside of the 180 days afforded to the complainants. Nonetheless, FTA initiated its investigation into the transfer policy matter under its investigation authority provided in 49 CFR § 21.11(c), due to the allegations. Unlike an individual who has 180 days from the alleged incident to file a Title VI complaint, FTA does not have the same time constraint. As FTA conducted the investigation under its own authority, any barrier as to the complaints' timeliness is moot.

**Transfer Policy**

At the time of the transfer policy change, FTA required grantees to comply with FTA Circular 4702.1A, which required grantees to "evaluate significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact." (Circular 4702.1A, Ch. V, sec. 4). Essentially, Circular 4702.1A recommended options a grantee should utilize to ensure fare changes did not have a discriminatory impact. (id.)

However, the revised Title VI Circular, FTA Circular 4702.1B, requires a specified approach to fare equity analyses. Yet, Circular 4702.1B did not become effective until October 1, 2012, well after the June 13, 2012 transfer policy change date. Given the timing of the events, TriMet did not have any formalized requirement to analyze the effects of the transfer policy. Furthermore, the TriMet material indicates that though never formally analyzing the possible effects of a transfer policy, public participation occurred during the process to modify the transfer policy. TriMet attempted to work with the complainants to expand the Transfer policy, and TriMet has a history of proactively seeking Title VI technical assistance.

TriMet indicated a proposed Ordinance will alter the transfer policy, but the ordinance is postponed until FTA determines whether a fare equity analysis is required for a transfer policy change. TriMet expressed a willingness to conduct a fare equity analysis, if FTA determines a transfer policy requires a fare equity analysis. FTA Circular 4702.1B does not explicitly state that a transfer policy is considered a fare medium. Nevertheless, as the Title VI Circular states "compliance with this Circular does not relieve a recipient from the requirements and responsibilities of the DOT Title VI regulation at 49 CFR part 21." (Circular 4702.1B, Ch. II, sec. 2).

DOT Title VI regulation states in part, "[a]recipient, in determining the types of services, financial aid, or other benefits . . . may not, through contractual or other arrangements, utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the
objectives of the program with respect to individuals of a particular race, or national origin." (49 CFR Section 21.5(b)(2)). A transfer fare policy can be viewed as a benefit/financial aid imparted on riders, which has financial reverberations on the rider, as well as the transit agency. A transfer policy directly affects a rider's ability to access a transit system. The transfer policy relates to the amount a rider will spend on a ride and may affect his/her choice in which fare medium to purchase. Due to the nexus a transfer policy has with accessing a transit system, FTA views a change to a transfer policy the same as a change to any fare medium. As a result, a transfer policy change requires a fare equity analysis to determine whether a proposed change will result in a disparate impact and/or disproportionate burden.

FTA recommends that TriMet seek technical assistance for any proposed transfer policy change. Please note that technical assistance is available as long as the transfer policy has not received final board approval, or the equivalent. Additionally, any fare equity analysis requires ridership data. This data is necessary to conduct a compliant fare equity analysis. It is imperative that TriMet identify whether it must update its ridership data to better understand its transfer usage. Fare data is normally collected via surveys, and there may be a need to amend any current surveys to capture the transfer usage data.

**Conclusion**

FTA does not find TriMet noncompliant with FTA's Title requirements for the 2012 transfer policy change. We are therefore requiring no corrective action and are closing the complaint as of the date of this letter. Nevertheless, continued Title VI compliance will require TriMet to conduct a fare equity analysis for any future changes to the transfer policy. FTA is able to assist TriMet, if it desires to seek technical assistance.

If you have any questions, please contact Jonathan Ocana at (202) 493-0314 or via e-mail at jonathan.ocana@dot.gov. Please include the FTA complaint number in any correspondence regarding this complaint.

Sincerely,

Dawn Sweet
Acting Title VI Team Leader
Office of Civil Rights

cc: TriMet
FTA Region 10
APPENDIX B: TriMet 2013 Title VI Program, pg. 28
MAJOR SERVICE CHANGES – ONE LINE

A major service change to a line will be considered to have a disparate impact if condition 1. and either condition 2.(a) or 2.(b) below is found to be true:

1. The percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole, and;

2.(a) In the event of service reductions, the service change has an adverse effect on the minority population in the service area of the line.

2.(b) In the event of service additions, the addition is linked to other service changes that have adverse effects on the minority population in the service area of the line, or; the service addition on the subject line is linked with a service change(s) on other line(s) that have adverse effects on the minority population in the service area of that line or lines.

For lines with major service changes, if the percentage of minority population in tracts served by the impacted portion of the line (sum of minority population in all impacted tracts divided by the total population in all impacted tracts) exceeds the percentage of minority population in the TriMet District as a whole, the impacts of changes to the line will be considered disparate.

MAJOR SERVICE CHANGES – SYSTEM LEVEL

To determine the system-wide impacts of service changes on more than one line, the percentage of impacted minority population (sum of minority population in all impacted tracts divided by the minority population of the TriMet District as a whole) is compared to the percentage of impacted non-minority population (sum of non-minority population in all impacted tracts divided by the non-minority population of the TriMet District as a whole). Comparisons of impacts between minority and non-minority populations will be made for all changes for each respective day of service — weekday, Saturday, and Sunday.

If the percentage of impacted minority population differs from the percentage of impacted non-minority population by more than 20 percent, the overall impact of changes will be considered disparate.

FARE CHANGES

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.

Differences in the use of fare options between minority populations and other populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

PUBLIC PARTICIPATION AND BOARD APPROVAL

Community Forum participants generally affirmed TriMet’s current Disparate Impact Policy in that they did not offer suggestions for change. Rather, participants focused on a variety of equity issues as they relate to people of color and their experience on the transit system. The following topics were commonly discussed: personal safety; maintenance and quality of
APPENDIX C: 2012 TriMet Fare Survey
1. What line are you riding on now? Line # _______ Line name ________

2. Do you have to transfer to or from a different line to make this trip in one direction?
   □ No
   □ Yes. If Yes, how many times?
   □ 1 time
   □ 2 times
   □ 3 or more times

3. If you must transfer to make this trip, what lines do you transfer to or from? (not including the bus or train you are on now)
   □ MAX
   □ WES
   □ Portland Streetcar
   □ C-TRAN Route 
   □ SAM Transit

4. How did you pay your fare for this trip? (check one)
   □ Tram fare
   □ C-TRAN fare
   □ Portland Streetcar fare
   □ 2-Hour Ticket ($1)
   □ Portland Streetcar Annual Pass ($150)

5. Which Tram fare? (Please check one)
   □ Adult
   □ Youth/Student
   □ Honored Citizen/STAR
   □ Lift
   □ Employee ID with Tram sticker
   □ College ID with Tram sticker
   □ High school ID with Tram sticker and/or embedded with Tram logo
   □ Honored Citizen Downtown Pass
   □ Other

6. Is your single-fare payment being used for a one-way or a round-trip?
   □ One-way trip
   □ Round-trip

7. If you are using a 1-Day Pass, how many one-way trips will you make on it today?

8. Where did you buy your fare for this trip?
   □ Onboard the bus
   □ Pass by Mail
   □ Social Service Agency Purchased for me
   □ Ticket Vending Machine
   □ School or Place of Employment
   □ Other
   □ Tram Ticket Office
   □ Online
   □ Retail Store
   □ Purchased on Streetcar

9. Do you have a vehicle you could have used to make this trip either as the driver or as a passenger?
   □ Yes
   □ No

10. Do you have a checking or savings account?
    □ Yes
    □ No

11. Do you have or use a pre-paid or regular debit or credit card?
    □ Yes (check all that apply)
    □ Pre-paid card
    □ Bank-issued debit card
    □ Bank-issued credit card
    □ No

12. Including yourself, how many people live in your household?

13. How many trips have you taken on a TriMet bus/MAX in the last month? (count each direction as one trip)

14. What is your age?

15. Are you a college student?
    □ Yes, full-time
    □ Yes, part-time
    □ No
    □ If you are a college student, which college?
    □ PSU
    □ PCC
    □ Other

16. Are you:
    □ Asian/Pacific Islander
    □ Caucasian White
    □ Multi-racial/bi-racial
    □ African American/Black
    □ Hispanic/Latino
    □ Native American Indian
    □ Other

17. What was your total annual household income before taxes in 2011? (check one)
    □ Under $10,000
    □ $20,000 to $29,999
    □ $40,000 to $49,999
    □ $60,000 to $69,999
    □ $70,000 or more
    □ Don’t know

18. Do you speak a language other than English at home?
    □ Yes
    □ No
    □ If yes, what language is this?
    □ English
    □ Spanish
    □ Other

19. How well do you speak English?
    □ Very well
    □ Well
    □ Not well
    □ Not at all

Please return to surveyor or fold 1st from each edge and mail postage-paid. Thank you for taking time to fill out this survey.
Encuesta a los pasajeros de TriMet

Favor de llenar este formulario aún si ya lo recibió en otro tren o autobús.

**Estimado Pasajero:** TriMet necesita saber algunos datos sobre el viaje que hace en estos momentos. Favor de contestar las siguientes preguntas. Cuando termine entregue al encuestador o envíe por correo.

1. ¿En qué línea viaja en estos momentos?  
   **Línea** [ ] Nombre de la ruta/linea

2. ¿Necesita hacer trasbordos de una línea a otra para completar este viaje en una dirección?  
   [ ] No  [ ] Sí. Si la respuesta es sí, ¿cuántas veces? [ ] 1 vez  [ ] 2 veces  [ ] 3 o más veces o más

3. Si hace trasbordos en este viaje, ¿de qué líneas a qué líneas trasborda?  
   (no incluya el tren o autobús en que ahora viaja)  
   **Línea** [ ] Nombre de la ruta/linea  
   **Línea** [ ] Nombre de la ruta/linea
   [ ] MAX  [ ] WES  [ ] Portland Streetcar  [ ] Ruta C-TRAN #  [ ] Transporte SAM

4. ¿Cómo pagó este viaje?  
   [ ] Tarifa de TriMet  [ ] Tarifa de C-TRAN  [ ] Tarifa de Portland Streetcar  
   Si pagó de Streetcar, ¿qué tipo de pasaje?  
   [ ] Boleto de 2 horas ($1)  [ ] Pase Anual Portland Streetcar ($150)

5. ¿Qué usó para pagar en TriMet?  
   [ ] Identificación de empleado con etiqueta de TriMet  
   [ ] Identificación de la universidad con etiqueta de TriMet  
   [ ] Identificación de Escuela Preparatoria con etiqueta de TriMet  
   [ ] Pase de Ciudadano Honorable para el centro de la ciudad  
   [ ] Otra ____________________________

6. Si pagó un solo pasaje, ¿es para un viaje de ida o de ida y vuelta?  
   [ ] Viaje de ida  [ ] Viaje de ida y vuelta

7. Si viaja con un pase de 1 día, ¿cuántos viajes sencillos hará con él el día de hoy?  
   [ ] 1  [ ] 2  [ ] 3  [ ] 4  [ ] 5  [ ] 6  [ ] 7  [ ] 8  [ ] 9  [ ] 10  [ ] más

8. ¿Dónde compró su pasaje para este viaje?  
   [ ] A bordo del autobús  [ ] Pase por correo  [ ] Una agencia de servicio social lo compró para mí  
   [ ] En una máquina expendedora de boletos  [ ] En la escuela o el lugar de trabajo  [ ] Otro ____________________________  
   [ ] En una oficina de boletos de TriMet  [ ] En línea  
   [ ] En una tienda  [ ] Lo compré en el tranvía

9. ¿Tiene un vehículo que podría haber usado para hacer este viaje ya sea como conductor o como pasajero?  
   [ ] Sí  [ ] No

10. ¿Tiene cuenta bancaria de ahorros o cheques?  
    [ ] Sí  [ ] No

11. ¿Tiene o usa trajeta prepagada, tarjeta de débito o trajeta de crédito?  
    [ ] Sí  (marque todo lo que aplique)  
    [ ] Tarjeta prepagada  [ ] Tarjeta bancaria de débito  [ ] Tarjeta bancaria de crédito  
    [ ] No

12. Incluyendo a usted, ¿Cuántas personas viven en su hogar?  
    [ ]

13. En los últimos 30 días, ¿cuántas veces se ha transportado en autobuses de TriMet/MAX? (cuente cada dirección como un recorrido)  
    [ ]

14. ¿Cuál es su edad?  
    [ ]

15. ¿Es Ud. estudiante universitario?  
    [ ] Sí, a tiempo completo  [ ] Sí, a medio tiempo  [ ] No  
    Si es Ud. estudiante universitario, ¿a qué universidad o colegio asiste?  
    [ ] PSU  [ ] PCC  [ ] Otro ____________________________

16. ¿Es Ud. (marque sólo uno)  
    [ ] Afroamericano/Negro  [ ] Caucásico/Blanco  [ ] Multiracial/birracial  [ ] Otro ____________________________  
    [ ] Asiático/De las Islas del Pacífico  [ ] Español  [ ] Hispano/Latino  [ ] Nativo Americano

17. ¿Cuál fue el ingreso anual de su hogar antes del pago de impuestos para el año 2011? (marque un cuadrado)  
    [ ] Menos de $10,000  [ ] $10,000 a $19,999  [ ] $20,000 a $29,999  [ ] $30,000 a $39,999  [ ] $40,000 a $49,999  [ ] $50,000 a $59,999  [ ] $60,000 a $69,999  [ ] $70,000 o más

18. ¿Ha hablado un idioma que no sea inglés?  
    [ ] Sí  [ ] No  
    ¿Qué idioma es ese?  
    [ ]

19. ¿Cuál bien habla el inglés?  
    [ ] Muy bien  [ ] Bien  [ ] No bien  [ ] No hablo inglés

**Entregue la tarjeta al encuestador o dóbleela, péagle y envíela por correo. No necesita estampilla. Gracias por su atención.**