Title VI Program Update
Presentation to the TriMet Board of Directors
August 10, 2016

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Jake Warr, Title VI & Equity Programs Administrator
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

- 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

<table>
<thead>
<tr>
<th>Household Size</th>
<th>150% FPL Income Threshold (2016)</th>
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<tbody>
<tr>
<td>1</td>
<td>$17,820</td>
</tr>
<tr>
<td>2</td>
<td>$24,030</td>
</tr>
<tr>
<td>3</td>
<td>$30,240</td>
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<tr>
<td>4</td>
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<tr>
<td>5</td>
<td>$42,660</td>
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<tr>
<td>6</td>
<td>$48,870</td>
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</table>
## Spring 2016 on-board fare survey

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

- **Total trips taken by minority riders increased from 27% in 2012 to 37% in 2016**
No change from 2012 survey results

Trips by Income (weekdays)

Not low-income 58%
Low-income 42%

Note: Low-income defined as at or below 150% federal poverty level
Spring 2016 on-board fare survey

Vehicle Mode (weekday trips)

By race/ethnicity

- White non-Hispanic: Bus 59%, MAX 41%
- Minority: Bus 63%, MAX 37%

By income

- Higher Income: Bus 54%, MAX 45%
- Low-income: Bus 62%, MAX 37%

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

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.

Why make these changes?
Recognizes that data has margins of error, and makes analysis more robust.
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)