Equity Analysis: Honored Citizen Fare Increase

DRAFT

Department of Diversity & Transit Equity

March 23, 2015
Executive Summary: Honored Citizen Fare Increase Equity Analysis

In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts an equity analysis any time fare changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The proposal to increase Honored Citizen fares in September 2015 calls for such an analysis prior to the board taking action.

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 Honored Citizen fare increase, the analysis aimed to answer two main questions:

1. Does increasing Honored Citizen fares (and only Honored Citizen fares) disproportionately impact minority and low-income riders?
2. Do the specifics of this fare increase proposal disproportionately impact minority and low-income Honored Citizens?

To answer these questions, staff utilized data from the most recent TriMet fare survey, conducted onboard in fall 2012.

Findings

Disparate Impact Analysis (Minority Riders)
The analysis found that minorities are underrepresented amongst Honored Citizens, meaning that increasing just Honored Citizen fares does not disproportionately impact minority riders. Additionally, minority and non-minority Honored Citizens use different fare products (e.g. single fares, monthly passes) at similar rates. Thus, the proposal to increase single fares and monthly passes by different percentages does not present an apparent Disparate Impact.

Disproportionate Burden Analysis (Low-income Riders)
The analysis found that Honored Citizens are disproportionately low-income. Additionally, low-income Honored Citizens are more likely to use single fares than monthly passes, and single fares would receive the greatest rate of increase under the proposal.

➢ Therefore, this proposal does present a Disproportionate Burden on low-income riders.

Alternatives to Address Findings

Per FTA, identification of a Disproportionate Burden calls for TriMet to “avoid, minimize, or mitigate impacts where practicable.” Avoiding the Disproportionate Burden would entail keeping Honored Citizen fares at their current levels. Assuming the fare increase will be adopted, below are three options for leadership’s
consideration to address the Disproportionate Burden identified (it is important to note that options 1 and 2 are not mutually exclusive):

**Option 1: Minimize**
TriMet could make an effort to increase utilization of 7-Day, 14-Day, and monthly Honored Citizen passes. These passes are proposed for smaller rates of increase than the single fare and 1-Day pass, and initial outreach has indicated that Honored Citizens may not be fully aware of the fare product options available to them. Also, the proposal maintains the Honored Citizen Downtown Pass with no cost increase, which provides a low-cost option for Honored Citizens living within the downtown core.

**Option 2: Mitigate**
TriMet could build upon its current Access Transit Program by:

- Increasing the budget and target the increase towards Honored Citizens
- Increasing the discount participating agencies receive on Honored Citizen fares, and
- Add Honored Citizen fares to those set aside for Short-term Fare Relief.

**Option 3: No additional action**
TriMet could adopt the Honored Citizen fare increase as planned without addressing the impacts identified in this analysis. This would require a rationale for why avoiding, minimizing, and/or mitigating for the Disproportionate Burden is not practicable from the agency’s standpoint.
I. Background

TriMet is proposing an increase to Honored Citizen fares, which allow seniors and people with disabilities to ride TriMet at a reduced rate. The agency has not raised Honored Citizen fares since 2010, even while increasing other fares in order to meet budget shortfalls. During this same period, some Adult single ticket fares increased 22%, with Adult monthly passes increasing as much as 29%. TriMet also agreed to implement the recommendation from the Committee on Accessible Transportation (CAT) to hold Honored Citizen fares flat while increases to LIFT paratransit fares were phased in, which was accomplished in 2014. The fare increase as proposed would maintain consistency with FTA guidelines and restore Honored Citizen fares to the historical level of one-half the adult fare, which had been TriMet’s prior practice, and simplify the fare structure by aligning Honored Citizen and Youth fares.

Raising Honored Citizen fares now would restore them to the historical level of one-half the adult fare, simplify the fare structure by aligning Honored Citizen and Youth fares, and help TriMet maintain and expand service to meet the transit needs of a growing elderly population.

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.”

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 on the next page shows the sequence of steps and considerations in the equity analysis process.
II. TriMet Title VI Compliance

In the fall of 2013, TriMet updated its Title VI Program, which received concurrence by the Federal Transit Administration (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. Disparate Impact Policy

Testing for Disparate Impacts 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 besides white, non-Hispanic.

**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.

B. Disproportionate Burden Policy
Testing for Disproportionate Burden evaluates potential effects on low-income populations. The analysis is identical to that used to determine potential Disparate Impacts, but comparing low-income – defined as at
or below 150% of the federal poverty level – and higher income rather than minority and non-minority populations. Higher income includes all those above 150% of the federal poverty level.

III. Proposed Fare Changes for Fall 2015

A. Description of Changes

TriMet is proposing changing pricing of Honored Citizen fares, effective September 1, 2015. The current and proposed fares by fare type are shown in Table 1. The change would bring the Single Fare and the 1-day Pass for Honored Citizens up to half the Adult price; FTA requires fixed route transit providers to offer fares to seniors and people with disabilities (Honored Citizens) at no more than half the full (Adult) fare. All other products – the 7-day Pass, 14-day Pass, Monthly/30-day Pass, and Annual Pass – would increase, but would remain substantially less than half the Adult price. Fares for Honored Citizens would align with Youth fares after the increase.

Honored Citizens take about 14% of TriMet system rides on weekdays, and 17% on weekends. To be eligible for Honored Citizen fares, riders must be 65 years or older, be on Medicare, or have a disability. Honored Citizen fares have remained at the same level since 2010, while Adult tickets and passes have seen several increases over that period.

Table 1: Proposed Honored Citizen fare changes and Adult fares

<table>
<thead>
<tr>
<th></th>
<th>Honored Citizen</th>
<th>Adult</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Current Fare</td>
<td>New Fare</td>
</tr>
<tr>
<td>Single Fare (cash/ticket)</td>
<td>$1.00</td>
<td>$1.25</td>
</tr>
<tr>
<td>1-day Pass</td>
<td>$2.00</td>
<td>$2.50</td>
</tr>
<tr>
<td>7-day Pass</td>
<td>$7.00</td>
<td>$7.50</td>
</tr>
<tr>
<td>14-day Pass</td>
<td>$13.50</td>
<td>$14.50</td>
</tr>
<tr>
<td>Monthly/30-day Pass</td>
<td>$26.00</td>
<td>$28.00</td>
</tr>
<tr>
<td>Annual Pass</td>
<td>$286.00</td>
<td>$308.00</td>
</tr>
</tbody>
</table>

B. Disparate Impact Analysis

The 2012 TriMet on-board Fare Survey (survey instrument attached in Appendix A) collected fare payment and demographic data necessary to conduct a fare equity analysis consistent with the policies described in Section II of this report.

The first level of the Disparate Impact analysis is a determination of how Honored Citizens compare to other riders in terms of racial/ethnic minority status. As shown in Table 2 and Figure 2, the share of trips taken by minority riders is lower among Honored Citizens than others. For example, while minority riders take 21% of all Honored Citizen trips on weekdays, they take 28% of all non-Honored Citizen trips on weekdays. The
difference is even greater on weekends. In other words, Honored Citizens are less likely to be minorities than other riders, based on their use of the TriMet system. This indicates that increases to Honored Citizen fares overall would not disproportionately impact minority riders.

**Table 2: Comparison of minority status for Honored Citizens and all others**

<table>
<thead>
<tr>
<th></th>
<th>Weekdays&lt;sup&gt;1&lt;/sup&gt;</th>
<th>Weekends&lt;sup&gt;1&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Honored Citizen</td>
<td>All Other</td>
</tr>
<tr>
<td></td>
<td>Trips</td>
<td>Trips</td>
</tr>
<tr>
<td>Minority</td>
<td>21%</td>
<td>28%</td>
</tr>
<tr>
<td>Non-minority</td>
<td>79%</td>
<td>72%</td>
</tr>
<tr>
<td>Total</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

<sup>1</sup>Differences between column pairs are statistically significant at the 95% confidence level.

<sup>2</sup>n’s indicate weighted number of survey responses.

Since different fares are proposed to increase by different percentages, the next level of analysis looks at the degree of increase by fare type to see whether that leads to any potential disparities. Table 3 and Figures 3-4 display this information for both weekdays and weekends, and the data indicates that minorities and non-minorities are about as likely as each other to use each individual Honored Citizen fare type – with the exception of the Honored Citizen Downtown Pass. The Downtown Pass is used more for trips taken by minority riders; because the $10 administrative fee for the pass is not being proposed for an increase, this does not indicate a potential Disparate Impact.
Table 3: Proposed Honored Citizen fare changes and usage by race/ethnicity
2012 TriMet Fare Survey

<table>
<thead>
<tr>
<th>Fare media</th>
<th>Current Fare</th>
<th>New Fare</th>
<th>Fare change Pct.</th>
<th>Pct. of Non-minority Trips (n=461)¹</th>
<th>Pct. of Minority Trips (n=118)</th>
<th>Pct. of Non-minority Trips (n=410)</th>
<th>Pct. of Minority Trips (n=112)</th>
</tr>
</thead>
<tbody>
<tr>
<td>HC Single fare (cash or ticket)</td>
<td>$1.00</td>
<td>$1.25</td>
<td>+25%</td>
<td>25%</td>
<td>25%</td>
<td>29%</td>
<td>27%</td>
</tr>
<tr>
<td>HC 1-Day Pass</td>
<td>$2.00</td>
<td>$2.50</td>
<td>+25%</td>
<td>5%</td>
<td>8%</td>
<td>9%</td>
<td>4%</td>
</tr>
<tr>
<td>HC 7-Day Pass</td>
<td>$7.00</td>
<td>$7.50</td>
<td>+7%</td>
<td>0%</td>
<td>2%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>HC 14-Day Pass</td>
<td>$13.50</td>
<td>$14.50</td>
<td>+7%</td>
<td>1%</td>
<td>2%</td>
<td>1%</td>
<td>2%</td>
</tr>
<tr>
<td>HC Monthly/30-Day Pass</td>
<td>$26</td>
<td>$28</td>
<td>+8%</td>
<td>57%</td>
<td>47%</td>
<td>46%</td>
<td>43%</td>
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<tr>
<td>HC Annual Pass</td>
<td>$286</td>
<td>$308</td>
<td>+8%</td>
<td>3%</td>
<td>1%</td>
<td>1%</td>
<td>1%</td>
</tr>
<tr>
<td>HC Downtown Pass²</td>
<td>$10</td>
<td>$10</td>
<td>0%</td>
<td>9%</td>
<td>17%</td>
<td>13%</td>
<td>23%</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

¹ n’s indicate weighted number of survey responses

² The HC Downtown Pass cost is an administrative fee, and not a fare. The pass is good for two years.

Bold = statistically significant difference between minority & non-minority trips at 95% confidence level

Figure 3: Weekday fare payment type by minority & non-minority Honored Citizens
TriMet 2012 Fare Survey

Statistically significant difference (95% confidence level)
Thus, given the available data, TriMet finds no potential Disparate Impact on minority populations under this proposal to increase Honored Citizen fares.

C. Disproportionate Burden Analysis

Similar to the Disparate Impact analysis, the first level of the Disproportionate Burden analysis is a determination of how Honored Citizens compare to other riders in terms of low-income status. Low-income is defined as at or below 150% Federal Poverty Level, and higher income is defined as all others. As shown in Table 4 and Figure 5, the share of trips taken by low-income riders is higher among Honored Citizens than others. For example, while low-income riders take 63% of all Honored Citizen trips on weekdays, they take 39% of all non-Honored Citizen trips on weekdays. The difference is not as great on weekends, but still meets the standard of a statistically significant difference. In other words, Honored Citizens are more likely to be low-income than other riders, based on their ridership. This indicates that increases to Honored Citizen fares overall would disproportionately and adversely affect low-income riders.

![Figure 4: Weekend fare payment type by minority and non-minority Honored Citizens](image-url)
Table 4: Comparison of low-income status for Honored Citizens and all others
TriMet 2012 Fare Survey

<table>
<thead>
<tr>
<th></th>
<th>Weekdays(^1)</th>
<th>Weekends(^1)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Honored Citizen Trips (n=563)(^2)</td>
<td>All Other Trips (n=3,379)</td>
</tr>
<tr>
<td>Low-income(^3)</td>
<td>63%</td>
<td>39%</td>
</tr>
<tr>
<td>Higher Income</td>
<td>37%</td>
<td>61%</td>
</tr>
<tr>
<td>Total</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

\(^1\) Differences between columns are statistically significant at the 95% confidence level.
\(^2\) n’s indicate weighted number of survey responses.
\(^3\) Low-income defined as at or below 150% federal poverty; Higher income is all others.

Since different fares are proposed to increase by different percentages, the next level of analysis looks at the degree of increase by fare type to see whether that leads to any potential disparities. Table 5 and Figures 6-7 display this information, and indicate that on both weekdays and weekends, low-income Honored Citizen fares are more likely to be single fare cash or ticket than higher income Honored Citizen fares. The other statistically significant differences found are between low-income and higher income Honored Citizen monthly/30-day passes and Honored Citizen Downtown Passes: both of these are more often used by higher income Honored Citizens. However, it should be noted that the Honored Citizen Downtown Pass was initially implemented as a mitigation measure to a previous fare change, and in response to community
feedback and concern about seniors and people with disabilities. Offering the Downtown Pass at the same cost is meant to help those who live within the downtown area, many of whom are low-income, continue to use transit to access essential services such as medical care, social services and shopping.

The analysis suggests potential disproportionate and adverse effects on low-income riders because:

- Honored Citizen single fares are proposed for the highest percentage increase, and
- Fares paid by low-income Honored Citizens are more likely to be single fares than fares paid by higher income Honored Citizens.

### Table 5: Proposed fare changes and usage by income status

2012 TriMet Fare Survey

| Fare media                  | Current Fare | New Fare | Fare change Pct. | Weekdays Pct. of Low-income Trips (n=349)
|-----------------------------|--------------|----------|------------------|-----------------------------------------------
| TriMet Fare Survey          |              |          |                  | Pct. of Higher Income Trips (n=184)           |
|                             |              |          |                  | Pct. of Low-income Trips (n=315)              |
|                             |              |          |                  | Pct. of Higher Income Trips (n=169)           |
| HC Single fare (cash or ticket) | $1.00 | $1.25 | 25%              | 30%                                           |
| HC 1-Day Pass               | $2.00 | $2.50 | 25%              | 7%                                            |
| HC 7-Day Pass               | $7.00 | $7.50 | 7%               | 1%                                            |
| HC 14-Day Pass              | $13.50 | $14.50 | 7%               | 2%                                            |
| HC Monthly/30-Day Pass      | $26 | $28 | 8%               | 47%                                           |
| HC Annual Pass              | $286 | $308 | 8%               | 3%                                            |
| HC Downtown Pass\(^2\)      | $10 | $10 | 0%               | 10%                                           |
| Total                      |              |          |                  | 100%                                          |

\(^1\)n’s indicate weighted number of survey responses.

\(^2\)The HC Downtown Pass cost is an administrative fee, and not a fare. The pass is good for two years.

**Bold** = statistically significant difference between low-income and higher income trips at 95% confidence level.
Thus, given the available data, TriMet finds a potential Disproportionate Burden on low-income populations under this proposal to increase Honored Citizen fares.
D. Summary of Findings

A summary of the results of the Disparate Impact and Disproportionate Burden analyses is shown in Table 6. The proposal to increase Honored Citizen fares, and not fares for other riders, does not appear to have any Disparate Impacts on minority riders. Additionally, the specific proposal to increase single fares by $0.25, monthly passes by $2, and so on would not disproportionately affect minority Honored Citizens.

On the other hand, both increasing Honored Citizen fares while not increasing fares for other riders, and the specific structure of the fare increase proposal, present a potential Disproportionate Burden on low-income Honored Citizens. While noting that Honored Citizen fares have not increased in five years, while Adult fares have, this finding nevertheless suggests TriMet should attempt to avoid, minimize, or mitigate the disproportionate impacts of the Honored Citizen fare increase.

<table>
<thead>
<tr>
<th>Potential Disparate Impact?</th>
<th>Potential Disproportionate Burden?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increasing Honored Citizen fares only</td>
<td>No</td>
</tr>
<tr>
<td>Structure of fare increase</td>
<td>No</td>
</tr>
</tbody>
</table>

IV. Proposed Mitigations

As of this draft report, which is being produced to inform the TriMet Board’s action, decisions have not been finalized regarding the fare increase or how TriMet will attempt to avoid, minimize, or mitigate the Disproportionate Burden identified in the equity analysis. Avoiding the Disproportionate Burden would entail keeping Honored Citizen fares at their current levels. Assuming that the fare increase is adopted by the TriMet Board, this section presents options for agency leadership to consider in this process (note that options 1 and 2 are not mutually exclusive). The final Title VI equity analysis will describe the approved actions to be carried forward.

Option 1: Minimize disproportionate impacts

The specifics of the fare increase proposal are meant to minimize impacts as much as possible, while bringing the Honored Citizen fare to the FTA guideline of half the adult fare. Continuing to offer the Honored Citizen Downtown Pass at the same cost (a $10 administrative fee) helps those who live within the downtown area, many of whom are low-income and access a variety of services located there. Additionally, the smaller increase to annual, monthly, bi-weekly, and weekly passes means that the majority of Honored Citizens – low-income and higher income alike – would not experience as significant a rise in costs.
A point to note from the data is that utilization of 7-day and 14-day Honored Citizen passes is relatively small. TriMet could make an effort to determine whether this is due to lack of product awareness, and if so to market these passes as a way for Honored Citizens currently using single fares and day passes to save money.

**Option 2: Mitigate disproportionate impacts**

In order to help offset fare increases adopted in 2012, TriMet established a Low-income Fare Mitigation program, now called Access Transit. This program has two components:

**Fare Assistance Program**
Provides a discount on tickets and passes to qualifying non-profit organizations and government agencies who serve low-income clients. Participating organizations must distribute purchased fares to their clients either at no cost, or at a cost no higher than the discounted rate. Most organizations do not charge clients for fares.

**Fare Relief Program**
Provides tickets and passes in the form of fare grants to qualifying non-profit organizations who serve low-income clients. Participating organizations then distribute at no cost to their clients. This program also includes a Short-term Fare Relief component, wherein persons not connected to a participating organization can receive temporary assistance directly.

If the Honored Citizen fare increase is adopted, TriMet could mitigate for disproportionate impacts to low-income riders by expanding the Access Transit Program in the following ways:

- Increase Access Transit funds by 20%, which is the proportion of low-income ridership who are Honored Citizens. These funds would be earmarked specifically for organizations who serve low-income older adults and people with disabilities. This would require targeted outreach to such organizations to boost awareness of the Access Transit program. Concerted outreach to community partners will help to make sure they are aware of the programs and increase the network of participating organizations that are able to provide assistance to individuals. TriMet will continue to monitor needs and usage to determine future mitigation levels.
- Increase the Fare Assistance discount for Honored Citizen fares from 5% to 20% to match the discount received on Adult fares.
- Add Honored Citizen fares to those set aside for short-term fare relief.
- Address ability to continue to providing transit service for seniors and/or people with disabilities, many of whom are forced to live in the outlying areas of the district due to the availability of affordable housing, etc.
**Option 3: Take no additional action**

TriMet could adopt the Honored Citizen fare increase as planned without addressing the impacts identified in this analysis. This would require a rationale for why avoiding, minimizing, and/or mitigating for the Disproportionate Burden is not practicable from the agency’s standpoint.

**V. First Phase Community Engagement**

TriMet has begun discussing the fare increase proposal with key stakeholders and community members. These discussions have focused on both the increase itself, as well as ways to mitigate for its impacts on low-income populations. The following provides a summary of activities conducted thus far, with many more planned leading up to the TriMet Board’s decision on whether to adopt the increase, and beyond if it is adopted.

**Committee on Accessible Transportation (CAT)**

TriMet staff presented the fare increase proposal to the Committee on Accessible Transportation (CAT) on January 21, 2015, and met with the CAT Executive Committee on two other occasions to discuss the proposal in greater detail. The CAT Executive Committee recognizes the need to resume increases in Honored Citizen fares, as fare levels have remained flat since 2010, while adult fares have increased as much as 45 cents for a single ticket during this time. They also acknowledge that continuing to delay fare increases poses challenges to keeping up with service costs and meeting the transit needs of the growing population of seniors and people with disabilities. The CAT Executive Committee has submitted a letter in support of the fare increase, and to help offset the impact of the increase, has recommended implementing the mitigation strategy outlined previously.

The committee also recommended giving priority to improving transit service in the outer areas of the TriMet district, including complementary LIFT paratransit service, where more and more low-income individuals are now forced to live due to the availability of affordable housing.

**Transit Equity Advisory Committee (TEAC)**

TriMet’s Transit Equity Advisory Committee reviewed the Honored Citizen fare increase proposal, the analysis results presented here, and some mitigation alternatives at its monthly meeting on February 19, 2015. A point of focus for the committee was outreach to communities of color, due to the finding that people of color are under-represented amongst Honored Citizens. While this leads to a finding of no Disparate Impact related to the fare increase, it also indicates that older adults and people with disabilities who are also of color are not accessing the discounted Honored Citizen fares as much as others. One strategy to help address this may be engaging in targeted marketing of the availability of Honored Citizen fares.
TEAC also emphasized that not all Honored Citizens are connected to community-based organizations, and therefore may not benefit from increases to the Access Transit program. Thus, in addition to expanding Access Transit, TriMet should find ways to provide direct assistance to low-income Honored Citizens in order to mitigate for the fare increases.

**Stakeholder Roundtable**

On March 5, 2015 TriMet staff hosted a roundtable discussion with representatives of organizations serving older adults and people with disabilities. Staff presented the fare increase proposal and the proposed mitigation strategy, asking for feedback from the participants (many of whom currently participate in TriMet’s Access Transit program). Attendees had concerns about the fare increase overall. Several questioned raising Honored Citizen fares at all and encouraged TriMet to drop the proposal to increase Honored Citizen fares at this time. It was understood that doing so would eliminate the potential for disproportionate impacts on low-income riders, but would also prevent TriMet from achieving the objectives of simplifying the fare structure and returning the Honored Citizen fare to historical parity, thus furthering its commitment to improving service and financial stewardship.

In regards to the proposed mitigation strategy, stakeholders pointed to the difficulty older adults and people with disabilities have accessing systems and institutions. This may present a barrier to adequately mitigating for the impacts of the increase on low-income Honored Citizens under the proposed mitigations provided in Section IV of this report. In response, the mitigation proposal was modified to include adding Honored Citizen fares to those set aside for short-term fare relief. These fares are accessed directly by riders in need, even if they are not connected to a participating community-based organization.
APPENDIX A: Fall 2012 TriMet on-board fare survey questionnaire