

To: MP&L Committee

Date: October 29, 2013

From: Laramie Bowron, Manager of Planning Reviewed by:

SUBJECT: Title VI for Senior Mid-Day Free Fare

Background:

At the August 2013 Board of Directors meeting, the Board authorized implementation of a mid-day free fare for seniors on a demonstration basis. It is necessary to perform a Title VI analysis prior to or during the demonstration period to conform to the Federal Transit Administration regulations. Title VI policies were adopted by the Board to ensure that service and fare changes are equitable. The policies as included below for reference.

Disparate Impact Policy

County Connection establishes that a fare change, major service change or other policy has a disparate impact if minority populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-minority populations, unless (a) there is substantial legitimate justification for the change, and (b) no other alternatives exist that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin.

Disproportionate Burden Policy

County Connection establishes that a fare change, major service change or other policy has a disproportionate burden if low-income populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-low-income populations unless the disproportionate effects are mitigated.

Summary of Issues:

Staff has conducted a Title VI Equity Analysis based on data compiled from the on-board survey completed by MTC in April 2012.

The following table illustrates that offering mid-day free fares for seniors does not violate County Connection's Disproportionate Burden or Disparate Impact policies.

Based on the survey data, nearly 60 percent of riders identify with minority races and nearly 50 percent of total riders are categorized as low-income.

When compared to system wide percentages for minority and low-income, senior riders have a lower percentage of minorities but a higher percentage of low income. Because the difference is not more than 20%, seniors are not getting a disproportionate benefit and non-seniors are not getting a disproportionate burden as defined in County Connection Title VI policies.

System	Seniors - Race		% Difference Minority
% Minority	% Minority	% Non-Minority	
59.4%	43.3%	56.7%	-13.5%
System	Seniors - Income		% Difference Low-Income
% Low-Income	% Low-Income	% Non-Low-Income	
49.3%	50.5%	49.5%	1.1%

This data is sufficient to support the implementation of this fare policy and ensures that this does not violate County Connection’s Title VI program or policies.

Action Required - None