

**Title VI Fare Change Equity Analysis: Low-Income Bus Fare Reduction**

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September 23, 2024



**King County**

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## II. Executive Summary

To best serve its most vulnerable riders and ensure a seamless transfer experience with its partner transit agencies, King County Metro Transit Department (Metro) piloted a reduction in its low-income bus fare from \$1.50 to \$1.00 in September 2022. King County is now proposing to permanently maintain the \$1.00 fare for low-income riders rather than allowing it to revert back to \$1.50.

As a large transportation agency and the recipient of federal funds, Metro must conduct a Title VI Fare Equity Analysis whenever it makes changes to its fares to determine whether the fare changes will have a disparate impact on minority riders or place a disproportionate burden on low-income riders in accordance with FTA Circular Chapter 4, Part VII(b).

Metro did not find that the proposed fare change will have a disparate impact on minority populations, nor a disproportionate burden on low-income populations, and therefore submits the proposed Ordinance to permanently maintain the \$1.00 low-income bus fare to the King County Council for approval.

### III. Background

**Department Overview:** The King County Metro Transit Department (Metro) is the Puget Sound region’s largest public transportation agency. Metro provides bus, paratransit, vanpool, and water taxi services, and operates Seattle Streetcar, Sound Transit Link light rail, and Sound Transit Express bus service. Metro is committed to providing safe, equitable, and sustainable mobility, and prioritizing service where needs are greatest.

**Key Historical Conditions (or Historical Context):** Metro’s low-income fare, also known as ORCA LIFT, is available to qualifying adults whose incomes are verified to be at or below two hundred percent of the federal poverty level. As of June 2024, more than 70,000 people are enrolled in the program.

**Key Current Conditions (or Current Context):** To best serve its most vulnerable riders and ensure a seamless transfer experience with its partner transit agencies, Metro piloted a reduction in its low-income bus fare from \$1.50 to \$1.00 in September 2022. Metro is now proposing to permanently maintain the \$1.00 fare for low-income riders rather than allowing it to revert back to \$1.50.

**Report Methodology:** Metro’s policies concerning disparate impact and disproportionate burden for Title VI equity analysis are found in its 2021 Service Guidelines and its 2022 FTA Title VI Program Report. To determine if there is a disparate impact on minority riders or disproportionate burden on low-income riders/users based there must be an unfavorable impact of greater than five percent threshold; that is, if a fare increase impacts minority or low-income individuals by over five percentage points more than non-minority or non-low-income individuals, the fare would be determined to have a disparate impact or disproportionate burden.

Metro employs the following formula to determine if there is a disparate impact on minority individuals:

**IF** % Affected Minority Riders/Users – % Affected Non-Minority Riders/Users > 5%  
**AND** the impact is unfavorable,  
**THEN** there is a disparate impact

Similarly Metro employs the following formula to determine if there is a disproportionate burden placed on low-income individuals.

**IF** % Affected Low-Income Riders/Users – % Affected Non-Low-Income Riders/Users > 5%  
**AND** the impact is unfavorable,  
**THEN** there is a disproportionate burden

This five percent threshold was developed by Metro through a public engagement process and was approved by both the King County Council and the FTA in Metro’s 2022 Title VI Program Report. The Regional Transit Committee and the County Council’s Mobility and Environment Committee reviewed this policy and forwarded it to the full County Council. The Council followed a public notification and participation process, held a public hearing, and then adopted the updated Service Guidelines via Ordinance 19637. This threshold and policy is applied uniformly to all fare changes.

If a disparate impact or disproportionate burden is found in the FEA, Metro will consider steps to avoid, minimize, or mitigate potential adverse impacts.

#### IV. Report Requirements

Metro is committed to providing mobility and transportation services in an equitable, nondiscriminatory, and fair manner in compliance with the requirements set forth by the Federal Transit Administration (FTA) Circular 4702.1B (“FTA Circular”). Metro affirms its commitment Title VI of the Civil Rights Act of 1964.

Among its responsibilities as a large transportation agency and the recipient of federal funds, Metro must conduct a Title VI Fare Equity Analysis (FEA) whenever it makes changes to its fares to determine whether the fare change will have a disparate impact on minority riders or place a disproportionate burden on low-income riders in accordance with FTA Circular Chapter 4, Part VII(b). This FEA will apply the rules and polices set forth in the FTA Circular and Metro’s Service Guidelines to this proposal.

Metro is proud to uphold the civil rights protections championed by its county’s namesake, Dr. Martin Luther King Jr. Questions about this analysis or Metro’s commitment to civil rights and Title VI should go to [MetroTitleVI@kingcounty.gov](mailto:MetroTitleVI@kingcounty.gov).

##### A. Proposal

Metro is proposing to permanently maintain the \$1.00 fare for low-income bus riders rather than allowing it to revert back to \$1.50.

Table 1. Proposed Fare Change

Fare Type	Cost if No Action Taken	Proposed Cost	Absolute Change	Percent Change
Low-Income Bus Fare	\$1.50	\$1.00	-\$0.50	-33%

##### B. Fare Equity Analysis

To conduct this FEA, Metro analyzed data from its low-income fare program registration database. The tables below compare the percentage of minority riders versus non-minority riders, and low-income riders versus non-low-income riders that will be affected by the proposed fare change.

Table 2. Disparate Impact Analysis for Minority Riders

Percent Minority	Percent Non-Minority	Difference
66%	34%	+32%
<p><b>What is the impact on riders/users?</b> Favorable</p> <p><b>Is there a disparate impact on minority riders/customers?</b> No</p>		

Applying Metro’s methodology described in Part III, the proposed fare change does not have a disparate impact on minority riders because the fare increase is unfavorable and the percent difference is below the five percent threshold.

*Table 3. Disproportionate Burden Analysis for Low-Income Riders*

Percent Low-Income	Percent Non-Low-Income	Difference
100%	0%	+100%
<p><b>What is the impact on riders/users?</b> Favorable</p> <p><b>Is there a disproportionate burden on low-income riders/customers?</b> No</p>		

Applying Metro’s methodology described in Part III, the proposed fare change does not have a disparate impact on low-income riders because the fare increase is unfavorable and the percent difference is below the five percent threshold.

**C. Modification or Mitigation**

Using the methodology described in Part III, the proposed fare change will not have a disparate impact on minority populations nor disproportionate burden on low-income riders. Therefore, no further analysis or discussion on modification or mitigation efforts is required.

**V. Conclusion/Next Steps**

Metro did not find that the proposed fare change will have a disparate impact on minority populations, nor a disproportionate burden on low-income populations, and therefore submits the proposed Ordinance to permanently maintain the \$1.00 low-income bus fare to the King County Council for approval.