

EVALUATION OF DISCONTINUED TOKENS

Federal Transit Administration (FTA) Circular 4702.1B provides guidance for the conduct of equity evaluations of proposed service and fare changes. A transit operator must have a locally adopted process for determining when public hearings, and the equity evaluations associated with such proposals, are required. Impacts to both minority and poverty level persons must be assessed, and there must be locally adopted standards for when differences between impacted persons and everyone else are significant.

Metro's Administrative Code contains these rules and definitions in Section 2-50. A public hearing and equity evaluation is required for any fare change. The difference between the minority/poverty shares of impacted riders and all others is deemed significant if either absolute difference is 5% or greater, or the relative difference is 35% or more.

Proposal to be Evaluated

At the present time, Metro riders may purchase Tokens in packages of 10 for \$17.50. Each token is good for one boarding on Metro and has a value equivalent to the Cash base fare of \$1.75. Tokens are also used as a means of funding transit travel for participants in Metro's Immediate Needs Program with each Token providing one boarding on Metro.

The proposed action would discontinue the availability of Tokens. Patrons who buy tokens would need to obtain or use a TAP card and add Stored Value to the card. TAP cards and the ability to add Stored Value to them are available at the same places where Tokens can be obtained, and are also available through Ticket Vending Machines (TVM's) meaning broader availability. In addition, if a TAP card with Stored Value is used to board Metro, then the patron is entitled to free Metro to Metro transfers for up to two and a half hours from the initial boarding – an added benefit. While the TAP card initially costs \$1 to \$2, depending on where it is purchased, its 10-year expected lifetime (it is reusable) means that the cost of the card is de minimus and not a factor for an equity analysis.

For those who receive Tokens through the Immediate Needs Program, there is a separate action being undertaken to replace that benefit with pre-loaded, stored value TAP cards. Thus, the benefit would be maintained using different media, and the added benefit of free transfers as described above would also be conferred. A separate Title VI evaluation of proposed changes to the Immediate Needs Program (as well as the Rider Relief Program) has been prepared.

Title VI Evaluation and Findings

The most current available ridership data was collected as part of the Fall 2016 Customer Satisfaction Survey. The relevant data provided by this survey includes method of payment, race, and poverty status. Comparative statistics for Token and TAP users are provided in Table 1.

Table 1

	<u>All Users</u>	<u>Token Users</u>	<u>Absolute Diff.</u>	<u>Relative Diff.</u>
Minority Share	91.4%	91.4%	0.0%	0.0%
Poverty Share	60.5%	74.0%	13.5%	22.3%

The minority shares of Token and TAP card users are not significantly different, so the proposed action would not have Disparate Impact on Token users. On the other hand, the share of Token users with poverty level incomes is significantly greater than for TAP card users. This creates a Disproportionate Burden on Token users from the proposed action. This impact is mitigated as the replacement media will have greater availability than Tokens, and also confer a greater benefit when used by virtue of the free Metro to Metro transfers provided.