EVALUATION OF ADDING TO TAP CARD STORED VALUE ON BUSES

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 the absolute difference is 5% or greater, or the relative difference is 35% or more, whichever is less.

Proposal to be Evaluated

At the present time, Metro riders may add to the stored value capability of their TAP card at Ticket Vending Machines (TVM's) at Metro rail and Orange Line stations, at Metro Customer Centers, third party sales outlets, and online at taptogo.net and by calling 866.TAPTOGO. The proposed action would permit patrons to also add to their stored value "purse" on buses.

Title VI Evaluation and Findings

The most current available ridership data was collected as part of the Spring 2016 Customer Satisfaction Survey. The relevant data provided by this survey includes method of payment, discount category, ethnicity, and poverty status. A comparison of minority representation among TAP stored value riders and all riders is provided in Table 1.

Table 1

	Minority Share	Absolute Diff.	Relative Diff.
TAP Stored Value			
Regular	77.52%	-10.72%	-12.15%
Elderly/Disabled	71.61%	-16.63%	-18.85%
Student (K-12)	89.95%	1.71%	1.94%
All Riders	88.24%		

Except for Student (K-12) riders, who represent only 4.63% of stored value TAP riders, the group of riders who would benefit from the increased convenience of being able to add value to their TAP cards on buses is significantly less minority than Metro's overall ridership. Providing this benefit would cause a disparate impact.

In order to proceed with the proposed action there must be a finding that there is a substantial legitimate justification for the proposed action, and that no other action having a lesser disparate impact would accomplish the objectives of the proposed action.

No such justification is being presented as part of this analysis.

Environmental Justice Evaluation and Findings

An environmental justice evaluation of the proposed action considers the poverty status of impacted riders in comparison with all riders. The poverty representation of the impacted riders compared with all riders is provided in Table 2.

Table 2

	Poverty Share	Absolute Diff.	Relative Diff.
TAP Stored Value			
Regular	63.47%	19.72%	45.07%
Elderly/Disabled	50.50%	6.75%	15.43%
Student (K-12)	23.08%	-20.67%	-47.25%
All Riders	43.75%		

The poverty representation of all subcategories of TAP stored value riders differs significantly from that of all riders. Since the action is considered beneficial, the higher poverty representation among full fare and elderly/disabled riders is acceptable. However, the significantly lower poverty share of Student (K-12) riders means that a disproportionate burden is created among these riders because the beneficiaries of the action are disproportionately not below the poverty level.

The Customer Satisfaction Survey data indicates that only 4.63% of TAP stored value riders are Student (K-12) riders. The benefit afforded to the other 95.37% of TAP stored value riders is significant and the group of TAP stored value riders as a whole has 60.43% of the group below the poverty level. The proposed action could probably proceed because the disproportionate burden falls upon a very small portion of the group of beneficially impacted riders were it not for the fact that the proposed action was found to cause a disparate impact upon minorities.