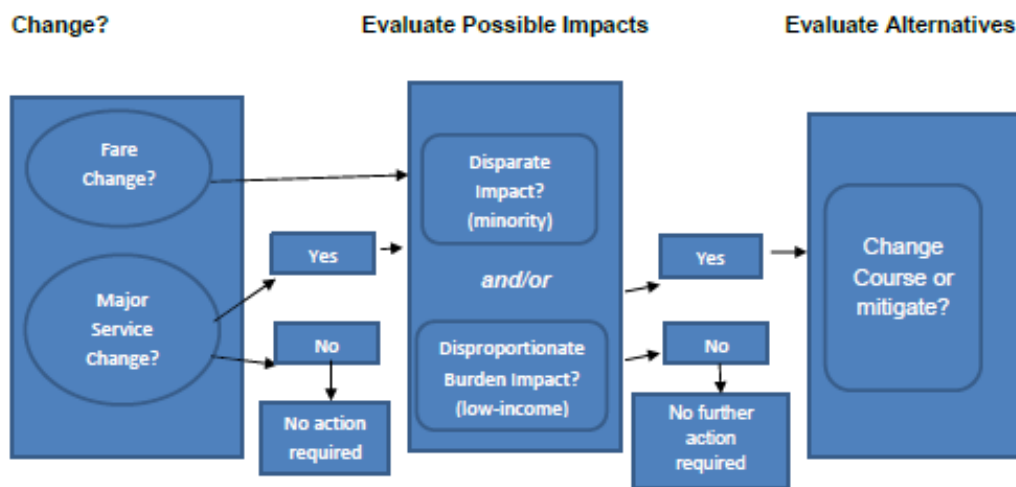


Metro Disproportionate Burden Policy

FTA Circular 4702.1B, revised in 2012, requires transportation agencies to develop a Disproportionate Burden policy to assist in the evaluation of impacts on minority and low-income riders when considering service and fare changes.

Testing for Disproportionate Burden evaluates potential effects on low-income riders or populations. Metro defines low-income riders as those with an annual income of \$69,350 or less for a four-member household in Los Angeles County, using the highest tier break in the American Community Survey (ACS) data that most closely aligns with the 2024 California Housing and Community Development (HCD) thresholds. The line and system level evaluations are identical to those used to determine potential disparate impacts but compare low-income and non-low-income populations rather than minority and non-minority.¹

Figure 1: Overview of Metro’s Title VI Equity Analysis process



Any changes in service meeting the definition of “Major Service Change” and any change in fares and/or fare media (increase or decrease) are subject to a Title VI Service Equity Analysis before the Board’s approval of the change. The results of the Title VI Equity Analysis will be presented to the Board for its consideration and the results will be included in the subsequent Metro Title VI Program Update with a record of action taken by the Board. Service changes considered “Minor” due to not meeting the thresholds of a Major Service Change are also analyzed and alternatives considered are documented, however, a Service Equity Analysis is not performed.

¹ Metro’s Disproportionate Burden policy is subject to change pending further FTA guidance.

For the 2025 FTA Title VI Program Update:

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden for major service and fare changes requires Metro to evaluate alternatives and mitigate burdens where practicable.

- a. For major service changes, a disproportionate burden will be deemed to exist if an absolute difference between the percentage of low-income persons adversely affected by the service change and the overall percentage of low-income persons is at least five percent (5%).
- b. For fare changes, a disproportionate burden will be deemed to exist if an absolute difference between the percentage of low-income persons adversely affected and the overall percentage of low-income persons is at least five percent (5%).