

Title VI Evaluation of Paratransit Fare Proposals
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Submitted by

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For East Bay Paratransit Consortium Services

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INTRODUCTION

In **2009**, East Bay Paratransit Managers from both AC Transit and BART began working with East Bay Paratransit's Rider Advisory Group, the Service Review Advisory Committee, to develop a proposal for increasing and restructuring fares for East Bay Paratransit ADA service. This effort was intended to restore a relationship between paratransit fares and fixed route fares, the latter of which had been increased more than once in preceding years. The proposal was also in response to budget crises at both agencies which resulted from the downturn in the economy and the loss of critical tax revenues for transit. A fare proposal has been endorsed by the rider advisory group, The Service Review Advisory Committee, and the Service Review Committee (the executive committee of East Bay Paratransit).

This report is a Title VI analysis to assess how the proposal will affect different rider populations, as well as to determine if the fare proposal results in disproportionately high and adverse effects on minority populations and low-income paratransit riders.

METHODOLOGY AND DATA SOURCES

Data derived from the 2010 East Bay Paratransit Consortium Rider Satisfaction Survey has been used in this Title VI analysis of the fare proposals. This rider survey, which has been undertaken twelve times since 1997, provides a statistically rigorous assessment of service quality on East Bay Paratransit. The survey also asks a number of demographic questions which have been used in this study. The Customer Satisfaction Survey is a telephone survey of approximately 500 riders. Survey respondents are randomly selected from among the total population of people who used East Bay Paratransit in a single week. The total sample size provides information about East Bay Paratransit which is statistically accurate within a margin of error of $\pm 4.28\%$.

Supplemental surveying was undertaken in May/June 2010 to obtain additional information about East Bay Paratransit customers making San Francisco and Daly City-bound trips. About 2% of riders go to or from San Francisco on a typical day, so this supplemental interviewing was needed to obtain statistically reliable sample sizes among these San Francisco/Daly City-bound riders. This data was then weighted by Tier (see Detailed Results) to accurately reflect the average monthly trips taken to or from San Francisco/Daly City.

In total, an additional 289 interviews were completed for this supplemental effort. Surveys were conducted with riders who had made a trip on East Bay Paratransit to or from San Francisco or Daly City within the last year. These interviews focused on aspects of the surveyed trip and demographic data pertinent to Title VI considerations.

Monthly ridership figures provided by East Bay Paratransit were also used in preparing this report.

Note that Susan Gallagher from BART prepared the initial Title VI analysis. Corey, Canapary & Galanis prepared this report which includes portions of Ms. Gallagher's report as well as an analysis of the San Francisco/Daly City bound riders.

Summary

Overall Service

In total, East Bay Paratransit averaged about 49,000 trips per month in Fiscal Year 2008/2009. Of these, about 98% are for trips that are within the East Bay and 2% are for trips between the East Bay and San Francisco/Daly City.

East Bay Trips

- East Bay fares are based on the distance traveled.
- Fares in the East Bay currently range from \$3.00 to \$6.00 per one way trip.
- The current average fare for East Bay Paratransit riders making trips within the East Bay is \$3.40.
- Proposed fares in the East Bay would range from \$4.00 to \$7.00.
- Under the proposed fares, East Bay Paratransit riders would see an average increase of approximately \$0.88 for trips within the East Bay, raising the average fare to \$4.28.
- Minorities currently pay about the same average fare (\$3.40) as non-minorities.
- Minorities would see a lower average increase under the proposed fares. Minorities would see an increase of approximately \$0.85 on average, to \$4.25 per East Bay trip, while non-minorities would see an average \$0.91 increase, to \$4.31 per East Bay trip.
- Low income riders currently pay, on average, approximately \$3.39 per East Bay trip, while non-low-income riders pay \$3.24 on average.
- Under the proposed fares, both low-income and higher income riders would see an average increase of \$0.87.
- This review analyzed the average proposed fare increase that would be paid on East Bay Paratransit for trips within the East Bay. These proposed fares do not appear to be significantly different between minority and non-minority, or between low income and not low income riders.

East Bay to San Francisco Trips

- Fares to San Francisco are zonal, with two zones. Current fares are \$6.00 or \$7.00.
- The current average fare for San Francisco/Daly City-bound riders is \$6.67.
- Proposed fares would be based on nine zones and range from \$6.00 to \$10.00.
- Under the proposed fare, San Francisco/Daly City-bound riders would see an average increase of approximately \$0.67, to \$7.34.
- Minorities currently pay a slightly higher average base fare than non-minorities (\$6.70 for minorities vs. \$6.63 for non-minorities).
- Under the proposed fares, minorities would see a slightly lower average increase, of \$0.65, vs. \$0.69 for non-minorities. However, minorities would still pay a slightly higher average fare, of \$7.35, vs. \$7.32 for non-minorities.
- Low-income riders currently pay about the same fare as non-low-income riders (\$6.67 vs. \$6.66).
- Under the proposed fares, low-income riders would see a slightly higher average increase (\$0.70 vs. \$0.64) than non-low-income riders. The average fare paid by a low-

income rider would be \$7.37, while the average fare paid by a non-low-income rider would be \$7.30.

- This review analyzed the average proposed fare increase that would be paid on East Bay Paratransit for trips between the East Bay and San Francisco/Daly City. These proposed fares do not appear to be significantly different between minority and non-minority, or between low income and not low income riders.

Detailed Results

EAST BAY TRIPS

Fares for East Bay destinations are broken down into 4 categories based on distance. These fares currently range from \$3 to \$6.

Proposed fares range from \$4 to \$7, representing a \$1 increase for three of the four fare categories. (There is no fare increase proposed for one fare category.)

Distance	Current Fare	Proposed Fare	Change (+\$)	Change (+%)
From 0 up to and including 8 miles	\$3	\$4	\$1	33%
Greater than 8 miles, up to and including 12 miles	\$4	\$4	-	-
Greater than 12 miles, up to and including 20 miles	\$5	\$6	\$1	20%
More than 20 miles	\$6	\$7	\$1	17%

Impact of Proposed Fares on Minorities

The majority of East Bay Paratransit riders identify themselves as minorities, as shown by the following data from the 2010 survey:

Racial/Ethnic Group	%
Non-White (NET)	65%
Black	44%
Hispanic	10%
Asian	9%
Native Hawaiian/Pacific Islander	2%
Native American/Alaska Native	1%
Other	<1%
White	35%
Refused	2%

Base: All Respondents (511) Multiple Responses accepted.

These figures are consistent with past surveys.

Race and ethnic status was crosstabulated with average monthly ridership numbers and current fare paid for the 2010 surveyed trip to determine the percentage of riders, by race or ethnicity, paying each fare.

Current Fare (\$)	Total Average Monthly Ridership	All Riders Base: 511	Minority Base: 330	Non-minority Base: 178
\$3	36,345	76%	73%	77%
\$4	5,701	12%	15%	9%
\$5	3,879	8%	7%	8%
\$6	1,955	4%	4%	5%
Average Current Base Fare		\$3.40	\$3.40	\$3.40

Proposed Fare (\$)	Total Average Monthly Ridership	All Riders Base: 511	Minority Base: 330	Non-minority Base: 178
\$4	42,046	88%	88%	86%
\$6	3,879	8%	7%	8%
\$7	1,955	4%	4%	5%
Average Proposed Base Fare		\$4.28	\$4.25	\$4.31
Average Increase in Base Fare		\$0.88	\$0.85	\$0.91

Overall, the average fare increase experienced by minorities will be \$0.85, while the average increase of non-minorities is \$0.91.

Impact of Proposed Fares on Low Income Riders

In the 2010 Survey, riders were asked about their annual household income level and their household size in order to determine whether they were low income. Riders were also asked about their living situation, whether in a group home or not. Overall, a large share of East Bay Paratransit riders are low income.

Income Level	%
Under \$7.5K	21%
\$7.5-\$15K	14%
\$15K-\$25	15%
\$25K-\$50K	11%
More than \$50K	8%
Refused	11%
Don't Know	20%

Base: All Respondents (511)

Poverty levels are a function of both income and household size. As household size increases, so does the income below which people are considered in poverty. As a measure of low income, this study uses 200% of the poverty thresholds for 2009 (extended to 2010). Where poverty levels fell in the middle of categories of income, a straight-line distribution was used to determine the number of riders above and below the level. Income and household size data were cross-tabulated with ridership data and current fares paid.

Current Fare (\$)	Total Average Monthly Ridership	All Riders* Base: 511	Low Income Base: 277	Not Low Income Base: 52
\$3	36,345	76%	76%	83%
\$4	5,701	12%	13%	13%
\$5	3,879	8%	9%	1%
\$6	1,955	4%	3%	3%
Average Current Base Fare		\$3.40*	\$3.39	\$3.24

Proposed Fare (\$)	Total Average Monthly Ridership	All Riders* Base: 511	Low Income Base: 277	Not Low Income Base: 52
\$4	42,046	88%	88%	96%
\$6	3,879	8%	9%	1%
\$7	1,955	4%	3%	3%
Average Proposed Base Fare		\$4.28*	\$4.27	\$4.10
Average Increase in Base Fare		\$0.88*	\$0.87	\$0.87

*A high share of respondents did not answer the income question or the household number question. Therefore, a number of respondents cannot be classified as either "Low Income" or "Not Low Income" and are not included in either of these sub-groups.

While the increase for both low income and not-low-income riders would be about \$0.87, low-income riders appear to be paying a slightly higher average base fare (\$3.39 vs. \$3.24 for not-low-income riders), and would continue to do so after the fare increase (\$4.27, vs. \$4.10 for not-low-income riders).

SAN FRANCISCO/DALY CITY TRIPS

Current base fares are either \$6 or \$7 for one-way trips between the East Bay and San Francisco. The amount paid does not take into account the East Bay pick-up/drop off point, but it does vary depending on where the trip ends in San Francisco or Daly City. In addition to this base fare, East Bay Paratransit collects \$2 on behalf of MUNI if the pick-up or drop-off point in San Francisco is more than 3/4 mile away from a BART station. The additional MUNI fare is not considered in this analysis.

Under the proposed system, both the East Bay pick-up/drop-off and the West Bay pick-up/drop-off determine the fare paid. Proposed fares are based on BART fares from the stations within the East Bay zones to various locations in the West Bay. For these proposed fares, the East Bay pick-up or drop-off point is assigned to a zone as follows:

Zone 1 includes Alameda, Berkeley, Emeryville, Piedmont, and Oakland.

Zone 2 includes Albany, Castro Valley, El Cerrito, El Sobrante, Kensington, Orinda BART, San Leandro, San Lorenzo, Richmond, and San Pablo.

Zone 3 includes Fremont, Hayward, Hercules, Milpitas, Newark, Pleasanton BART, Pinole, and Union City.

Proposed fares range from \$6 to \$10. (See table below.)

Category	Current Base Fare	Proposed Base Fare	Change (+\$)	Change (+%)
Tier 1 Between Zone 1 (East Bay) and Civic Center BART	\$6	\$6	-	-
Tier 2 Between Zone 2 (East Bay) and Civic Center BART	\$6	\$7	\$1	16%
Tier 3 Between Zone 3 (East Bay) and Civic Center BART	\$6	\$8	\$2	33%
Tier 4 Between Zone 1 (East Bay) and SF beyond Civic Center BART	\$7	\$7	-	-
Tier 5 Between Zone 2 (East Bay) and SF beyond Civic Center BART	\$7	\$8	\$1	14%
Tier 6 Between Zone 3 (East Bay) and SF beyond Civic Center BART	\$7	\$9	\$2	29%
Tier 7 Between Zone 1 and Daly City	\$7	\$8	\$1	14%
Tier 8 Between Zone 2 and Daly City	\$7	\$9	\$2	25%
Tier 9 Between Zone 3 and Daly City	\$7	\$10	\$3	43%

Tiers 1-6 may incur a \$2 Muni fare if pickup or drop off point in San Francisco is more than 3/4 mile from a BART station, which means total current fare per person could be \$8 (\$6 + \$2) or \$9 (\$7 + \$2) and total proposed fares would range from \$6 (Tier 1, no Muni fare) to \$11 (Tier 6 = \$9 + \$2 Muni fare).

Impact of Proposed Fares on Minorities

The majority of East Bay Paratransit riders identify themselves as minorities, with a possibly lower percentage of African-Americans, and a higher percentage of whites, traveling to or from San Francisco/Daly City when compared with East Bay Paratransit ridership as a whole.

Racial/Ethnic Group	Percentage (%)	
	2010 Customer Survey Base: 511	2010 Supplemental Survey - SF/Daly City Trips Base: 289
Non-White (NET)	65%	56%
Black	44%	33%
Hispanic	10%	13%
Asian	9%	9%
Native Hawaiian/Pacific Islander	1%	1%
Native American/Alaska Native	1%	1%
Middle Eastern	-	1%
Other	<1%	<1%
White	35%	46%
Refused	2%	1%

Multiple Responses accepted.

Race and ethnic status was crosstabulated with current fare paid for the 2010 surveyed trip to determine the current base fare and proposed base fare for both minority and non-minority riders. Using this data, it appears that (on average) minority riders currently pay approximately \$6.70 and non-minority riders pay approximately \$6.63. Under the proposed fare system, minority riders would pay approximately \$7.35 on average and non-minorities would pay \$7.32.

Currently, the average San Francisco/Daly City-bound rider pays an average base fare of \$6.67. Minorities pay an average of \$6.70 in base fare, while non-minorities pay an average of \$6.63.

Current Base Fare (\$)	Total Average Monthly Ridership	Rider Tiers Affected	All SF Riders Base: 289	Minority Base: 161	Non-minority Base: 132
\$6	396	Tiers 1-3	33%	30%	37%
\$7	786	Tiers 4-9	67%	70%	63%
Average Current Base Fare			\$6.67	\$6.70	\$6.63

The proposed base fare would increase the average rider's base fare by \$0.67. This increase averages about \$0.65 for minority riders and \$0.69 for non-minority riders. Since non-minority riders would pay a slightly larger increase, the difference in average fares would shrink under this proposal.

Proposed Base Fare (\$)	Total Average Monthly Ridership	Rider Tiers Affected	All SF Riders Base: 289	Minority Base: 161	Non-minority Base: 132
\$6	162	Tier 1	14%	11%	18%
\$7	625	Tiers 2/4	53%	56%	48%
\$8	248	Tiers 3/5/7	21%	22%	20%
\$9	122	Tiers 6/8	10%	9%	12%
\$10	25	Tier 9	2%	2%	2%
Average Proposed Base Fare			\$7.34	\$7.35	\$7.32
Average Increase in Base Fare			\$0.67	\$0.65	\$0.69

Note: In addition to the base fare, riders in Tier 1 through Tier 6 may also pay an additional \$2 Muni fare (for rides that go beyond 3/4 mile from a BART station).

Travel Patterns

The data shows that a higher share of minority riders make trips that fall into Tier 4 and a higher share of non-minority riders travel to Tier 1. Note that the fares in Tier 1 and Tier 4 remain unchanged under this proposal.

Impact of Proposed Fares on Low Income Riders

In the 2010 Supplemental Survey, riders were asked about their annual household income level and their household size in order to determine whether they were low income. Riders were also asked about their living situation, whether in a group home or not. In general, a large share of East Bay Paratransit riders are low income. (See page 8 of this report.) San Francisco/Daly City-bound riders were asked about their income with the ranges adjusted so that entire categories would fall wholly within or outside of poverty level guidelines (depending on household size).

Income Level	%
Under \$7,500	23%
\$7,500-\$15,000	27%
\$15,001-\$22,000	9%
\$22,001-\$29,000	9%
\$29,001-\$36,500	5%
\$36,501-\$44,000	4%
\$44,001-\$51,500	4%
\$51,501-\$59,000	2%
\$59,001-\$66,500	1%
\$66,501-\$75,000	2%
\$75,001-\$100,000	2%
\$100,001+	2%
Refused	2%
Don't Know*	8%

Base: All Respondents (289)

*Respondents saying "Don't know" were asked additional questions to determine approximate income and poverty level status.

Based on their responses, 71% fall below the poverty level threshold. As a measure of low income, this study uses 200% of the poverty thresholds for 2009 (extended to 2010).

Income and household size data were obtained, and this was crosstabulated with the rider's Tier level and matching proposed base fare. Based on this analysis, it appears low-income riders currently pay about the same base fare as non-low-income riders.

Current Base Fare (\$)	Average Monthly Ridership	Rider Tiers Affected	All SF Riders Base: 289	Low Income Base: 199	Not Low Income Base: 78
\$6	396	Tiers 1-3	33%	33%	34%
\$7	786	Tiers 4-9	67%	67%	66%
Average Current Base Fare			\$6.67	\$6.67	\$6.66

When comparing the increase from the current base fare to the proposed, low income riders have a slightly higher proposed base fare (\$7.37 vs. \$7.30 for not low income riders), The increase in fare for low income riders is about \$0.70 compared to about \$0.64 for not low income riders

Proposed Base Fare (\$)	Average Monthly Ridership	Rider Tiers Affected	All SF Riders Base: 289	Low Income Base: 199	Not Low Income Base: 78
\$6	162	Tier 1	14%	14%	12%
\$7	625	Tiers 2/4	53%	50%	58%
\$8	248	Tiers 3/5/7	21%	22%	20%
\$9	122	Tiers 6/8	10%	11%	8%
\$10	25	Tier 9	2%	2%	2%
Average Proposed Base Fare			\$7.34	\$7.37	\$7.30
Average Increase in Base Fare			\$0.67	\$0.70	\$0.64

Note: In addition to the base fare, riders in Tier 1 through Tier 6 may also pay an additional \$2 Muni fare (for rides that go beyond 3/4 mile from a BART station).

Travel Patterns and Their Impact on Fares

The data shows that a higher share of low income riders make trips that fall into Tier 3 and Tier 6. However, the overall difference between the average fares of low income and not low income riders under this proposal would be less than 1%.

Appendices

TITLE VI BACKGROUND

Title VI of the Civil Rights Act of 1964, Section 601 states:

No persons in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

According to the Federal Department of Transportation, equity in the provision of transit service is described as "providing equal levels of service to minority and non-minority residents of the urbanized area. Levels of service, in turn, are defined in terms of capital allocation and accessibility."¹ The indices of discrimination that could be monitored for disparate treatment include fare structures that could consistently cause minority-group riders to bear a higher average fare burden than non-minority group riders. To assess Title VI issues, an analysis should be conducted that uses data and other information to:

- Determine benefits to and potential negative impacts on minority populations and low-income populations from proposed investments or actions;
- Quantify expected effects (total, positive and negative) and disproportionately high and adverse effects on minority populations and low-income populations; and
- Determine the appropriate course of action, whether avoidance, minimization, or mitigation if adverse effects are identified.

DESCRIPTION OF EAST BAY PARATRANSIT SERVICES

The East Bay Paratransit Consortium (EBPC) was established in 1994 by the Alameda-Contra Costa Transit District (AC Transit) and the San Francisco Bay Area Rapid Transit District (BART) under a cooperative agreement to jointly provide paratransit services mandated and specified by the Americans with Disabilities Act (ADA). East Bay Paratransit is a transportation service for people who, because of a disability or a disabling health condition, are unable to use regular buses or BART trains all or some of the time. People who wish to use East Bay service must undergo a rigorous eligibility determination process.

The service territory of East Bay Paratransit is the overlapping service territory of AC Transit and BART and includes western Contra Costa County and western Alameda County. East Bay Paratransit also transports riders to and from any destination in San Francisco and arranges for transfers with adjacent paratransit systems so that people can travel throughout the nine county San Francisco Bay Region.

East Bay Paratransit is an important part of senior and disabled transportation in the service territory. Of the 21,300 people certified to use East Bay Paratransit, approximately 60% make at least one trip per year. East Bay Paratransit riders use the service to go to a variety of destinations. According to a FY 2010 systemwide survey, 32% are going to some sort of medical appointment (including those for dialysis and therapy/rehabilitation), while

¹ Transit Cooperative Research Program, Legal Research Digest: "The Impact of Civil Rights Litigation Under Title VI and Related Laws on Transit Decision Making", TCRP Project J-5, Washington, D.C. June 1997

19% were transported to and from an adult day program. The remaining trips include errands, work trips, education, and social engagements. Although there are no age requirements for ADA paratransit, about half of East Bay Paratransit's riders are seniors, with 56% under 65 years of age, 24% 65 to 80 years of age, and 20% over 80 years of age.