

Exhibit A to Resolution 25-09-47



Title VI Program

2025 Update

Submitted in fulfillment of Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B



September 2025
Available at trimet.org/civilrights

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Dear Reader,

TriMet's mission is to connect people with valued mobility options that are safe, convenient, reliable, accessible and welcoming for all. We are committed to treating each and every individual who accesses our services with dignity and respect, regardless of what they look like or where they come from.

This Title VI Program, which TriMet is required to submit to the federal government every three years, outlines many of the policies and practices we employ to live up to this commitment.

Equal access and freedom from racial discrimination have not always been enshrined in law. The historic Civil Rights Act of 1964 created a mandate that public accommodations and services, like public transit, be provided in a manner that does not discriminate.

Title VI of the Civil Rights Acts of 1964 states that, "No person 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."

TriMet eagerly fulfills the mandate of the Civil Rights Act through robust compliance with our Title VI program. We engage in proactive measures to honor both the spirit and letter of the law.

We remain passionately committed to carrying our Title VI program forward, ensuring that everyone in our community can access and use our transit system. At TriMet we say all are welcome, and we mean all are welcome.

Sam Desue Jr.

TriMet General Manager



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Executive Summary

Overview

Every three years TriMet submits a Title VI Program update to the Federal Transit Administration (FTA). The policies, standards, practices and analysis provided in this document demonstrate how TriMet complies with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color or national origin in programs and activities of any entity that receive federal assistance.

The FTA's Circular 4702.1B outlines the requirements for TriMet to ensure non-discrimination, which include:

- Notices to the public of rights under Title VI.
- TriMet's procedures for receiving and responding to Title VI complaints.
- A Public Participation Plan to ensure minority and low-income populations are engaged during decision-making processes.
- A Language Access Plan that demonstrates how TriMet ensures equal access for persons with limited English proficiency (LEP).
- Evidence of minority representation on TriMet's governing and advisory bodies.
- Title VI compliance monitoring of entities to whom TriMet passes federal funds (subrecipients), namely City of Portland (Portland Streetcar), Clackamas Community College, Portland Community College and Ride Connection. All TriMet subrecipients are in full compliance.
- Analysis of facility siting and construction since the last Program submission (does not apply for this submittal).
- Policies defining "Major Service Change", "Disparate Impact" and "Disproportionate Burden" and any related analyses completed since the last Program submission.
- Agency standards (regarding vehicle loads, service frequency, on-time performance and service availability) and policies (regarding distribution of stop amenities and vehicle assignment) and an analysis of adherence to these standards and policies.
- Demographic analysis pertaining to minority, LEP and low-income populations and riders.

Policies and Standards

Note: This draft Program update includes proposed modifications to the Major Service Change, Disparate Impact and Disproportionate Burden policies. Full details of these modifications are provided in Part II.

Major Service Change Policy

Definition

All changes in service meeting the definition of Major Service Change are subject to a Title VI Analysis prior to Board approval of the service change. TriMet defines a Major Service Change as any of the following:

- a. A 15% reduction or increase in a transit line's route miles, frequency or span (hours) of service.
- b. A new, removed, split or combined transit line.

Standard seasonal variations, emergency situations and temporary experimental changes are exempt from this definition.

Adverse effects vs. benefits

TriMet analyzes both adverse effects resulting from major service reductions and benefits resulting from major service improvements.

Disparate Impact Policy

The Disparate Impact Policy establishes a threshold and process for determining whether a given action has a potential unfair and adverse effect on minority populations.

Adverse effects (service reductions)

TriMet's Disparate Impact threshold is 5%, meaning if the minority population impacted by service reductions is at least 5 percentage points greater than the overall minority population in the TriMet service district (currently 34%), the reductions are flagged for a potential Disparate Impact. This is analyzed for each individual line proposed for a Major Service Change as well as all such lines combined.

Benefits (service improvements)

To ensure minority populations are not denied the benefits of service improvements, TriMet evaluates whether:

- a. A proposed improvement on a single transit line is linked to other service changes that have disproportionate and adverse effects on minority populations,

OR

- b. Considering all major service improvements combined, if the minority population living in the these transit lines' service areas is at least 5 percentage points *lower* than the service district's minority population as a whole (currently 34%), the overall effect of changes is flagged for a potential Disparate Impact.

Disproportionate Burden Policy

The Disproportionate Burden Policy establishes a threshold and process for determining whether a given action has a potential unfair and adverse effect on low-income populations.

TriMet's Disproportionate Burden policy mirrors the Disparate Impact policy, but applying to low-income rather than minority populations and riders.

Fare Changes

For fare changes, a potential Disparate Impact or Disproportionate Burden is noted when adverse effects would impact a 10-percentage-point greater share of minority or low-income riders than non-minority riders or non-low-income riders (respectively).

Service Monitoring

In analyzing agency standards and policies pertaining to service performance, TriMet found no disparities in terms of system performance that would indicate lesser service provision to minority or low-income populations (see Table ES-1).

TABLE ES-1: SERVICE MONITORING RESULTS SUMMARY

Metric	Disparate Impact?	Disproportionate Burden?
Service Frequency & Span	NO	NO
On-time Performance	NO	NO
Service Availability	NO	NO
Vehicle Loads	NO	NO
Stop Amenities	NO	NO
Vehicle Assignment	NO	NO

Demographic Analysis

Population

According to the latest data from the US Census Bureau's American Community Survey (2019-2023), the population in the TriMet service district has the following demographic characteristics:

- The **minority population** is about 34%, an increase from 31% in 2022. Most areas with higher concentration of minority populations are distributed across the western, eastern and northern parts of the service area.
- The **low-income population** is about 16%, which is a slight decrease from 17% in 2022. While low-income populations live throughout the TriMet service district, they are more highly concentrated on the east side of the Willamette River (Multnomah and Clackamas Counties) than the west (primarily Washington County).
- The **LEP population** is about 7%, similar to 2022. LEP households are generally concentrated in the east and west areas of the TriMet service district.

Riders

The following are a few key findings from analyzing the responses from TriMet riders who took the 2025 Attitudes and Awareness survey:

- As a whole, minority and low-income riders ride TriMet more frequently, take more trips requiring transfers and are more likely to consider themselves dependent on TriMet for a majority of their transportation needs (compared to non-minority and non-low-income riders, respectively).
- Over one-third (35%) of non-minority riders pay the Honored Citizen fare, compared to 28% of minority riders.
- The majority (55%) of low-income riders pay the Honored Citizen fare, compared to 33% of non-low-income riders.
- Across all groups, most riders pay their fare using Hop Fastpass™ (either a plastic or virtual card). One notable difference between groups is a high percentage of low-income riders who use a plastic (rather than virtual) card: 62% compared to 43-45% for other demographics.

Facilities

GIS mapping of existing, recently completed, in progress and planned facilities (e.g., stop and station improvements, ADA text-to-speech devices, light rail track crossings) did not reveal any apparent disparities in terms of proximity to these facilities.

Introduction

What is Title VI?

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities of any entity that receive federal assistance.

The Civil Rights Movement of the mid-1950s and '60s brought the issues of segregation and racial injustice to the forefront of our national consciousness. The movement resulted in the historic passage of the **Civil Rights Act of 1964**, a landmark civil rights and labor law in the United States that outlaws discrimination based on race, color, religion, sex^[a] and national origin.^[4] It prohibits unequal application of voter registration requirements, racial segregation in schools and public accommodations and employment discrimination. The act stands as one of the most significant legislative achievements in American history. The Civil Rights Act of 1964, included eleven “Titles” outlawing several types of race-based discrimination. One of these “Titles” — Title VI — included the following provision:

“No person in the United States shall, on the ground 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.”

The United States has a long history of unjust and unequal treatment towards people of color. Although we have come a long way over the past few centuries, we still see disparities throughout our society along the lines of race, ethnicity and class — even in cases where decisions are made with the best of intentions.

The intent of Title VI is to remove barriers and conditions that prevent minority, low-income and persons with limited English proficiency (LEP) from equal access to public goods and services. In effect, Title VI promotes fairness in federally assisted programs and activities. Title VI is rooted in the Constitutional guarantee that all human beings are entitled to equal protection of the law and specifically addresses involvement of impacted persons in the decision-making process.

There are many forms of unlawful discrimination based on race, color or national origin that can limit the opportunity of underrepresented communities to gain equal access to services and programs. In operating a federally assisted program¹, a recipient cannot, on the basis of race, color or national origin, either directly or through contractual means:

- Deny program services, aids or benefits;
- Provide a different service, aid or benefit, or provide them in a manner different than they are provided to others;
- Omit participation and access by limited English proficient persons; or
- Segregate or separately treat individuals in any matter related to the receipt of any service, aid or benefit.

About TriMet

TriMet is a mass transit district created by the Oregon legislature pursuant to Oregon Revised Statutes (ORS) Chapter 267. TriMet is a local government as defined under Oregon law, providing bus, light rail, commuter rail, and paratransit public transportation service in the Portland metropolitan area, providing about 63 million rides each year. Guided by a Board of Directors representing seven sub-districts, the organization is directed by a General Manager appointed by the Board and employs about 3,600 union and non-union employees.

What Does This Mean for TriMet?

The policies, standards, practices and analysis provided in this document demonstrate how TriMet (Tri-County Metropolitan Transportation District of Oregon) ensures compliance with Title VI. As a recipient of federal financial assistance through the Federal Transit Administration (FTA), TriMet is subject to the rules and regulations provided through FTA Circular 4702.1B *Title VI Requirements and Guidelines for Federal Transit Administration Recipients* effective October 1, 2012 ("Circular"). This report is provided as documentation of compliance with Title VI of the Civil Rights Act of 1964 in accordance with FTA grant recipient requirements.

TriMet's General Manager has overall responsibility for carrying out our agency's commitment to Title VI. TriMet's Executive Director of Public Access and Innovation and the Title VI and Public Access

¹ The Civil Rights Restoration Act of 1987 amended each of the affected statutes by adding a section defining the word "program" to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives Federal financial assistance.

Programs Manager are primarily responsible for administering and monitoring Title VI requirements, but it is the duty of every employee, vendor and contractor to ensure compliance with nondiscrimination and to further civil rights protections. The TriMet Board of Directors must also oversee and approve many of our agency's Title VI compliance activities.

TriMet's Commitment to Equal Access

TriMet's commitment to providing equal access can be seen across our agency, the transportation system we manage and the community we serve. It is embedded in our policies and practices, the investments we make, the partnerships we build, our workforce, our approach to contracting, and our ever-growing connections to our community.

Definitions

The following terms and definitions are from FTA Circular 4702.1B unless otherwise noted.

Direct Recipient: An entity that receives funding directly from FTA. For purposes of Title VI, a direct recipient is distinguished from a primary recipient in that a direct recipient does not extend financial assistance to subrecipients, whereas a primary recipient does.

Discrimination: Any action or inaction, whether intentional or unintentional, in any program or activity of a federal aid recipient, subrecipient or contractor that results in disparate treatment, Disparate Impact or perpetuating the effects of prior discrimination based on race, color or national origin.

Disparate Impact: A facially neutral policy or practice that disproportionately affects members of a group identified by race, color or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color or national origin.

Disparate Treatment: Actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e. less favorably) than others because of their race, color or national origin.

Disproportionate Burden: A neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Environmental Justice: Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," was signed by President Clinton on February 11, 1994. Subsequent to issuance of the Executive Order, the U.S. Department of Transportation (DOT) issued a DOT Order for implementing the Executive Order on environmental justice (EJ). The DOT Order (Order 5610.2(a), "Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," 77 FR 27534, May 10, 2012) describes the process the Department and its modal

administrations (including FTA) will use to incorporate EJ principles into programs, policies and activities.

Fixed Route: Public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.

Limited English Proficient (LEP) Persons: Persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. It includes people who reported to the U.S. Census that they speak English less than very well.

Low-Income Person: As defined by TriMet for the purposes of Title VI, low-income refers to a person whose median household income is at or below 150% of the U.S. Department of Health and Human Services (HHS) poverty guidelines.

Low-Income Population: Any readily identifiable group of low-income persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

Low-Income Transit Route: A route that has at least one half of its total revenue mileage in a Census block or block group with a percentage of low-income population that exceeds the percentage of low-income population in the transit service area as a whole.

Minority Persons: Include the following:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand and Vietnam.
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American or other Spanish culture or origin, regardless of race.
- Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands.

Minority Population: Any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as

migrant workers or Native Americans) who will be similarly affected by a proposed Department of Transportation (DOT) program, policy or activity.

Minority Transit Route: As defined by TriMet and in conformance with FTA C4702.1B, a route that has at least one-third of its total revenue service (measured in hours) in Census block groups with a percentage of minority population that exceeds the percentage of minority population in the transit service area.

National Origin: The particular nation in which a person was born, or where the person's parents or ancestors were born.

New Transit Route: A proposed designation of a transit route not currently listed in the TriMet Code, Chapter 22- Routes and Schedules; 22.05 Schedule Notices, will be considered as a "New Transit Route" as referenced in Part II: Title VI Policies, Major Service Change Policy, when such a route designation, if adopted, is to be included in the list of transit routes by subsequent amendment of the TriMet Code. The only such designation not considered as a "New Transit Route" is a change in route number and/or name only with no associated changes in routing, frequency, hours and days of service.

Non-Minority Persons: Persons identifying as exclusively as White and non-Hispanic/Latino.

Public Transportation: Regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability or low-income. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers and vans. Public transportation does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intra-facility shuttle services. Public transportation can be either fixed route or demand response service.

Recipient: Any public or private entity that receives federal financial assistance from FTA, whether directly from FTA or indirectly through a primary recipient. This term includes subrecipients, direct recipients, designated recipients and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.

Safe Harbor Language: A language spoken by at least 1,000 persons in the TriMet service district. Per the Department of Justice, vital documents should be translated into safe harbor languages to demonstrate "strong evidence of compliance" with TriMet's written translation obligations.

Service Standard/Policy: An established service performance measure or policy used by a transit provider or other recipient as a means to plan or distribute services and benefits within its service area.

Subrecipient: An entity that receives federal financial assistance from FTA through a primary recipient.

Title VI Program: A document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs

to FTA every three years. The Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.

Transit Provider: Any entity that operates public transportation service including states, local and regional entities and public and private entities. This term is inclusive of direct recipients, primary recipients, designated recipients and subrecipients that provide fixed route public transportation service.

Part I: General Requirements

FTA requires that all direct and primary recipients document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years. For all recipients, the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. A copy of the TriMet Board of Directors (Board) resolution evidencing approval of TriMet's Title VI Program is provided as [Attachment A](#): (Reserved) TriMet Board Resolution 25-09-41 .

This chapter contains Title VI Program components required in Chapter III of FTA Circular 4702.1B. This section includes the following information:

1. Title VI Public Notice
2. Title VI Complaint Procedures
3. List of Title VI Investigations, Complaints and Lawsuits
4. Public Participation Plan
5. Language Access Plan
6. Board Membership and Recruitment
7. Subrecipient Monitoring
8. Title VI Analysis for Facilities Siting and Construction
9. Title VI Analyses of major service and fare changes completed since the 2022 submission

Title VI Public Notice and Complaint Procedures

TriMet posts the Title VI public notice on our agency website,² in all vehicles (bus and rail) and in our administrative offices. TriMet's Title VI complaint form³ and procedures⁴ are also available in multiple

² <http://www.trimet.org/about/titlevi.htm>

³ <https://trimet.org/about/pdf/titlevi-complaint.pdf>

⁴ <http://www.trimet.org/about/titlevi-procedure.htm>

languages on our agency's website. See Attachments B, C and D for the vehicle notice, English language complaint form and administrative office notice, respectively.

TriMet's Title VI website notice is as follows:

TriMet Respects Civil Rights

TriMet operates our programs without regard to race, color, national origin, religion, gender, sex, sexual orientation, marital status or age, in accordance with applicable law.

TriMet's nondiscrimination policy statements

Title VI of the Civil Rights Act of 1964 states:

"No person 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."

Oregon Revised Statute 659A.403 states:

"All persons within the jurisdiction of this state are entitled to the full and equal accommodations, advantages, facilities and privileges of any place of public accommodation, without any distinction, discrimination or restriction on account of race, color, religion, sex, sexual orientation, national origin, marital status or age."

We are committed to complying with the requirements of Title VI in all of its federally funded programs and activities, as well as Oregon Revised Statute 659A.403. To request additional information on our nondiscrimination requirements, call us at 503-238-7433 (TTY 7-1-1) or send us an email.

Making a civil rights complaint

Any person who believes they have been aggrieved by an unlawful discriminatory practice under federal or state civil rights law may file a complaint with TriMet. Any such complaint must be in writing and filed with TriMet within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, contact us by any of the following methods:

Under Title VI, any person who believes they have been aggrieved by an unlawful discriminatory practice on the basis of race, color or national origin by TriMet may file a complaint by completing and submitting TriMet's Civil Rights Complaint Form. In addition to Title VI protected categories, TriMet accepts allegations of discrimination complaints based on sex, gender identity, sexual orientation, age, religion, marital status or disability in accordance with Oregon Revised Statute 659A.403.

TriMet investigates complaints received no more than 180 days after the alleged incident. TriMet will process complaints that are complete. Once a completed Complaint Form is received, TriMet will

review it to determine if TriMet has jurisdiction. The complainant will receive an acknowledgement letter informing the complainant whether the complaint will be investigated by TriMet.

TriMet will generally complete an investigation within 90 days from receipt of a completed Complaint Form. If more information is needed to resolve the case, TriMet may contact the complainant. Unless a longer period is specified by TriMet, the complainant will have ten (10) days from the date of the letter to send requested information to the TriMet investigator assigned to the case.

If TriMet's investigator is not contacted by the complainant or does not receive the additional information within the required timeline, TriMet may administratively close the case. A case may be administratively closed also if the complainant no longer wishes to pursue their case.

After an investigation is complete, TriMet will issue a letter to the complainant summarizing the results of the investigation, stating the findings and advising of any corrective action to be taken as a result of the investigation. If a complainant disagrees with TriMet's determination, they may request reconsideration by submitting a request in writing to TriMet's General Manager within seven (7) days after the date of TriMet's letter, stating with specificity the basis for the reconsideration. The General Manager will notify the complainant of their decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, the General Manager will issue a determination letter to the complainant upon completion of the review.

From the Title VI Circular

[R]ecipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website. FTA requires direct and primary recipients to report information regarding their complaint procedures in their Title VI Programs in order for FTA to determine compliance with DOT's Title VI regulations.

Title VI Investigations, Complaints and Lawsuits

This section provides information regarding investigations, lawsuits and complaints for the reporting period.

Investigations

There was one State of Oregon Bureau of Labor and Industries (BOLI) public accommodations investigation during the reporting period alleging sex and gender discrimination. It was investigated and dismissed for lack of sufficient evidence to continue investigation on July 26, 2023.

From the Title VI Circular

FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.

Lawsuits

A complaint was filed in state court on March 10, 2025, alleging that a bus operator discriminated against complainant based on race and age. The case is currently pending.

Formal Complaints

TriMet investigated and resolved all formal allegations of discrimination (“complaints”) based on Title VI-protected classes. Table 1-1 lists formal complaints received during the reporting period.

The Action Taken/Findings category is designated in accordance with the following:

Substantiated: Sufficient information has been obtained to determine the Title VI complaint as valid.

Unsubstantiated: The investigation concludes either a) the conduct by the employee was not discriminatory based on Title VI-protected classes, b) there is insufficient information to make a finding of Substantiated, or c) an irresolvable discrepancy exists between the employee’s and the customer’s account and no witness or evidence is available to corroborate either account.

TABLE 1-1: TITLE VI COMPLAINTS RECEIVED BY TRIMET SINCE LAST PROGRAM SUBMITTAL

Date Filed	Summary	Status	Actions Taken/Findings
10/19/22	Complaint filed with TriMet regarding unequal inspection of customers’ fares	Closed	Unsubstantiated
11/13/22	Customer service issue regarding bus operator not assisting passenger in closing windows on bus	Closed	Unsubstantiated
11/19/22	Complaint filed with TriMet regarding security guards moving complainant off train tracks	Closed	Unsubstantiated
12/1/22	Complaint filed with TriMet regarding not being allowed to board bus based on complainant’s race	Closed	Unsubstantiated

Date Filed	Summary	Status	Actions Taken/Findings
12/1/22	Customer service issue relating to an interaction with a security officer at a ticketing office	Closed	Unsubstantiated
12/28/22	Complaint filed with TriMet regarding having to pay fare while houseless people sleep on trains	Closed	Unsubstantiated
1/2/23	Customer service complaint regarding a bus pass up	Closed	Unsubstantiated
2/10/23	Complaint filed with TriMet regarding targeted fare inspection	Closed	Unsubstantiated
3/13/23	Complaint filed with TriMet regarding a bus pass up based on age and race	Closed	Unsubstantiated
3/31/23	Complaint filed with TriMet regarding bus operator closing doors on the complainant based on race	Closed	Unsubstantiated
4/25/23	Customer service issue regarding fare inspection	Closed	Unsubstantiated
5/1/23	Customer service issue regarding lack of greeting by bus operator	Closed	Unsubstantiated
5/5/23	Customer service issue regarding bus pass up	Closed	Unsubstantiated
5/20/23	Customer service issue regarding interaction with rail operator	Closed	Unsubstantiated
5/31/23	Incomplete complaint narrative	Closed	Unsubstantiated
6/2/23	Customer service issue regarding fare inspection and bus operator not allowing complainant to board	Closed	Unsubstantiated
6/30/23	Customer service issue regarding complainant not having fare	Closed	Unsubstantiated
8/2/23	Customer service issue regarding fare	Closed	Unsubstantiated
8/4/23	Customer service issue regarding bus pass up	Closed	Unsubstantiated
9/7/23	Customer service issue regarding interaction with bus operator	Closed	Unsubstantiated
9/10/23	Customer service issue	Closed	Unsubstantiated

Date Filed	Summary	Status	Actions Taken/Findings
10/19/23	Customer service issue regarding lack of fare and interaction with bus operator	Closed	Unsubstantiated
11/3/23	Customer service issue regarding complainant's bicycle	Closed	Unsubstantiated
11/24/23	Complaint filed with TriMet regarding bus pass up based on race	Closed	Unsubstantiated
11/27/23	Customer service issue regarding rail deboarding	Closed	Unsubstantiated
12/24/23	Customer service issue regarding bus operator not stopping at correct stop	Closed	Unsubstantiated
1/3/24	Customer service issue regarding bus operator's driving	Closed	Unsubstantiated
3/23/24	Complaint filed with TriMet regarding Hollywood Elevator Pilot	Closed	Unsubstantiated
5/19/24	Customer service complaint regarding paying fare	Closed	Unsubstantiated
6/11/24	Complaint filed with TriMet regarding bus pass up	Closed	Unsubstantiated
7/26/24	Complaint filed with TriMet regarding interaction with the bus operator	Closed	Unsubstantiated
8/8/24	Complaint filed with TriMet regarding interaction with bus operator	Closed	Unsubstantiated
8/24/24	Complaint filed with TriMet based on socio-economic status	Closed	Unsubstantiated
8/31/24	Complaint filed with TriMet regarding bus pass up	Closed	Unsubstantiated
9/15/24	Complaint filed with TriMet regarding rail pass up based on gender, sex and age	Closed	Unsubstantiated
9/24/24	Complaint filed with TriMet regarding bus pass up	Closed	Unsubstantiated
12/2/24	Complaint filed with TriMet regarding interaction with ticketing personnel based on national origin	Closed	Unsubstantiated
4/21/25	Complaint filed with TriMet regarding interaction with bus operator based on race	Closed	Unsubstantiated

Date Filed	Summary	Status	Actions Taken/Findings
5/8/25	Complaint filed with TriMet regarding interaction with rail operator based on national origin	Closed	Unsubstantiated
6/2/25	Complaint filed with TriMet regarding interaction with rail operator based on national origin	Closed	Unsubstantiated
6/14/25	Complaint filed with TriMet regarding interaction with bus operator based on race	Closed	Unsubstantiated

Public Participation Plan

TriMet has an established comprehensive public involvement process to ensure minority, low-income and LEP populations are engaged through public outreach and involvement activities.

In proposing service or fare changes, TriMet uses a variety of methods to communicate and solicit feedback from the community. TriMet also engages in extensive community outreach in conjunction with large-scale projects to ensure that affected residences and businesses are informed about the impacts and benefits of the project and are provided an opportunity for input in planning and implementation. On routes where there are a significant number of LEP riders or households, TriMet staff translates materials to ensure those community members can participate. Special attention is paid to the identification of any transit-dependent persons potentially affected by a route or service change.

Consistent with the requirements of Title VI, TriMet staff use geographic information systems (GIS) mapping software to create maps that identify affected minority, low-income and LEP communities. The analysis is shared with TriMet staff working with affected communities to identify strategies to engage minority, low-income and LEP populations.

TriMet's develops an annual Community Affairs & Engagement Plan; the draft plan for FY2026 (still in development) is provided as Attachment E.

Public Participation Highlights

TriMet's community engagement program is centered on nurturing strong working relationships with community partners that amplify the voices of TriMet riders. This includes convening advisory committees, partnering with local organizations to host conversations, and sponsoring and staffing community events.

This section provides highlights of TriMet's public participation efforts since its

2022 Title VI Program submission. The summary spans fall 2022 through spring 2025. During this period, TriMet held monthly meetings of the Committee on Accessible Transportation (CAT) and conducted outreach to inform major capital projects, bus service changes, a fare increase and other changes within the transit system.



FIGURE 1-1: OPEN HOUSE IN EAST PORTLAND IN 2023

Committee on Accessible Transportation (CAT)

CAT provides TriMet with ongoing input on topics related to accessibility. The committee also serves by providing TriMet staff a communications link to key community groups representing persons with disabilities and seniors. The committee's advisory role broadly covers topics related to transportation accessibility and improvements, using members' lived experience and practical familiarity with the Americans with Disabilities Act (ADA), to provide insight on important decisions impacting mobility options in the tri-county area.

Major capital projects

- **Division Transit Project** and the opening of the first TriMet FX[®] (Frequent Express) line
 - FX2-Division opened in September 2022, with a corridor-wide celebration that highlighted the unique communities along the route.



**FIGURE 1-2: INFORMATION BOOTH AT THE
WHITE LOTUS MID-AUTUMN FESTIVAL IN
2024**

- Prior to the opening, TriMet distributed multi-lingual safety and how-to-ride information and hosted preview rides for LEP populations and other communities.
- **A Better Red** extended MAX Red Line west to serve 10 more stations. The project also constructed a new light rail and bike/ped bridge over I-84 and added a second track near Portland International Airport and Gateway Transit Center to improve schedule reliability for the entire MAX system.
 - Construction spanned 2022 and 2023, with the new service opening in August 2024.
 - Bilingual information about construction was shared with neighbors via on-site signage, email, direct mail and in person.
 - Construction necessitated six MAX service disruptions, two freeway closures and several other traffic impacts. Outreach included email, bilingual on-site signage, social and earned media, paid advertising, and extensive in-person customer support.
- **Two future FX projects** moved from the Metro-led planning phase to TriMet’s leadership for design (and eventual construction and operation). During 2022, 2023 and 2024, TriMet partnered with Metro to build relationships with affected communities. Outreach focused on gathering feedback about the FX routes and potential station locations. Efforts included bilingual signage at bus stops, online and in-person open houses, on-board surveyors, focus groups, and community meetings.
 - **The TV Highway Transit & Safety Project**, which will upgrade Line 57 to FX
 - **The 82nd Avenue Transit Project**, which will upgrade Line 72 on 82nd Avenue to FX®. In 2025, TriMet invited input on the project design by convening a Community Advisory Committee, hosting in-person and online open houses, canvassing businesses along the route, and sending email and direct mail. Outreach included focus groups with LEP populations, with recruitment support from community partners.

Bus service changes

Improvements to bus service were focused implementing the [Forward Together service concept](#), which was developed in consultation with the community during 2022. Forward Together responds to post-

pandemic needs and ways people travel. It aims to increase bus ridership and expand service, especially for people experiencing low and limited incomes. The concept brings bus service to 50,000 more people and weekend service to 100,000 more, with significant increases to frequent bus service, connecting more people to jobs and opportunity.

- A first phase of public engagement in early 2022 asked members of the public to weigh in on what our goals should be as we consider post-pandemic service changes. This engagement effort centered on an online survey, with additional outreach through community-based organizations.
- The second phase of public engagement, in October 2022, asked people to respond to a Draft Service Concept. In this phase, specific information and maps about the proposed changes were shared and TriMet requested both general and detailed feedback on the plan. This effort included an online survey, online and in-person open houses, and outreach to community-based organizations and local government partners.
- Feedback on the Draft Service Concept helped refine the Final Service Concept, released in May 2023.

Before Board approval and implementation of specific service changes, TriMet performed two rounds of outreach via direct mail, on-board outreach, social and earned media, email, open houses, and discussions with key community groups. The first round of outreach asked for feedback on an initial proposal. The second round shared how the proposal had been adjusted in response to that community input.

Other system changes

TriMet has implemented many additional changes over the past three years, including:

- Increasing the price of 2½-hour and all-day fares. This outreach process, spanning most of 2023, included an online survey available in 11 languages, seven in-person open houses (five of which were co-hosted by community partners), and five online meetings, staffed by bilingual English and Spanish speakers with American Sign Language interpretation. Feedback from more than 5,600 respondents helped identify mitigations for those most impacted.
- Adding access control equipment to elevators at three grade-separated stations. Access control is intended to improve security and minimize elevator service disruptions caused by misuse. Outreach began through conversations with TriMet's Committee

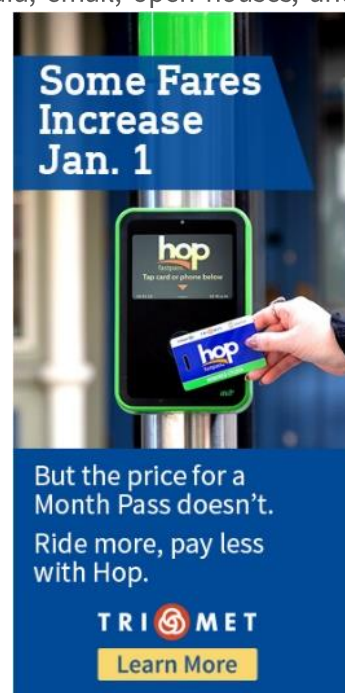


FIGURE 1-3: NOTICE TO RIDERS OF 2024 FARE CHANGE

on Accessible Transportation and included email, on-site signage and an online survey. After a pilot at one station starting in 2023, the program was improved and added to two additional stations in spring 2025.

- Closure of Skidmore Fountain MAX Station. The closure of this station, which is two blocks from the next station, was proposed in 2018, as part of an effort to shorten travel times for people riding through downtown Portland. That proposal was shelved in response to concerns from nearby businesses, but revived again in 2024, after boardings and alightings at the station remained low and development in the surrounding area failed to occur. Outreach in 2024 included email, direct mail, open houses, on-site signage, and social and earned media. Feedback largely favored the closure, which is now scheduled for August 2025.
- Replacing late-night MAX trips with bus service. Adding night buses across MAX lines and moving late-night/early-morning MAX trips to those buses allows for more overnight maintenance projects on the MAX system, reducing service disruptions. In early 2024, outreach on this proposal invited comments via on-site signage and through customer service staff speaking with late-night riders. Feedback was largely positive, and the change was implemented in August 2024.
- Miscellaneous MAX improvements. TriMet reached out to riders, neighbors and the general public about various projects to maintain and improve the MAX system. These efforts include email and direct mail, on-board outreach, social and earned media, discussion with community groups, and other communications. Projects included:
 - I-84 Clean Up (Summer 2024)
 - Stark/Burnside MAX Improvements (Spring 2024)
 - SW 11th Ave & Morrison MAX Improvements (Fall 2024)
 - East Burnside MAX Improvements (Spring 2025)
 - Type 6 EMI Testing (electromagnetic interference testing — Spring 2024)

Language Access Plan

TriMet is committed to full compliance with Title VI and Executive Order 13166 to provide meaningful access to programs, services and benefits for persons with limited English proficiency, or LEP. TriMet recently updated our Language Access Plan and Implementation Schedule (LAP) after an extensive review of the LEP populations in the TriMet service district and their needs.

From the Title VI Circular

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).

The LAP is built on two strategic pathways:

1. **Sustaining core practices** by continuing proven programs that address language access needs across the region.

2. **Expanding customer focus** by more deeply investing in four areas: language assistance services, notices to multilingual communities, monitoring and evaluation, and staff training.

This plan continues to guide TriMet as to how to best serve LEP populations and is provided as Attachment F.

Updated Four Factor Analysis

In accordance with FTA's policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. TriMet updated our Four Factor Analysis in spring 2025, relying on a variety of national and local data sources.

This updated analysis will guide TriMet efforts to retain successful programs and activities designed to meet the language needs of LEP populations and identify new areas of focus to further the agency's goal of providing LEP customers with meaningful access to TriMet programs and services.

LEP population figures derived from the US Census Bureau American Community Survey (2019-2023) are provided in Table 1-2. LEP persons comprise approximately 7% of the TriMet service district population, with Spanish as the most commonly spoken language (46% of the LEP population and 3.3% of the TriMet district population as a whole).

The top five languages (Spanish, Vietnamese, Chinese, Russian and Korean) identified mirror the top five languages identified in TriMet's 2019 Four Factor Analysis. These top five languages comprise about 76% of the total LEP population.

What is analyzed in a Four Factor Analysis?

1. The **number or proportion** of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. The **frequency** with which LEP persons come into contact with the program.
3. The **nature and importance** of the program, activity or service provided by the program to people's lives.
4. The **resources** available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Additionally, an updated map depicting where LEP populations are concentrated in relation to the TriMet service district is provided in [Chapter V: Demographic Analysis](#). Notably, LEP populations are largely concentrated in the western and eastern parts of the service area.

TABLE 1-2: LANGUAGES SPOKEN BY LEP PERSONS AGE 5 AND OLDER IN TRIMET SERVICE DISTRICT

Language Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	51,401	3.3%	45.9%
Vietnamese	13,144	0.8%	11.7%
Chinese (Cantonese, Mandarin)	11,293	0.7%	10.1%
Russian	5,387	0.3%	4.8%
Korean	3,325	0.2%	3.0%
Ukrainian	2,761	0.2%	2.5%
Arabic	2,485	0.2%	2.2%
Japanese	1,766	0.1%	1.6%
Tagalog	1,628	0.1%	1.5%
Persian/Farsi	1,234	0.1%	1.1%
Other (e.g., Romanian, Somali)	17,557	1.1%	15.7%
Total	112,630	7.2%	

Sources: TriMet GIS, Metro Regional Land Information System and US Census ACS Tables: 2019-2023 (5-Year Estimates).

Continued Language Services

The TriMet website includes a menu of 14 languages to view information (English, Spanish, Vietnamese, Korean, Russian, Chinese, Ukrainian, Japanese, Romanian, Tagalog, Khmer, Somali, Farsi and Somali), including a trip planning and vehicle tracking tool in the first six aforementioned languages. Additionally, any customers can access language assistance by calling TriMet Customer Service.

TriMet publishes a “How to Ride” brochure into all safe harbor languages and posts multilingual channel cards on TriMet vehicles (see Figures 1-4 through 1-7) that communicate vital customer information. Additionally, the LEP program continues to coordinate with our agency’s outreach efforts regarding budget, service changes, fare changes and construction projects to carry out targeted outreach to LEP communities that would be affected by proposed changes.

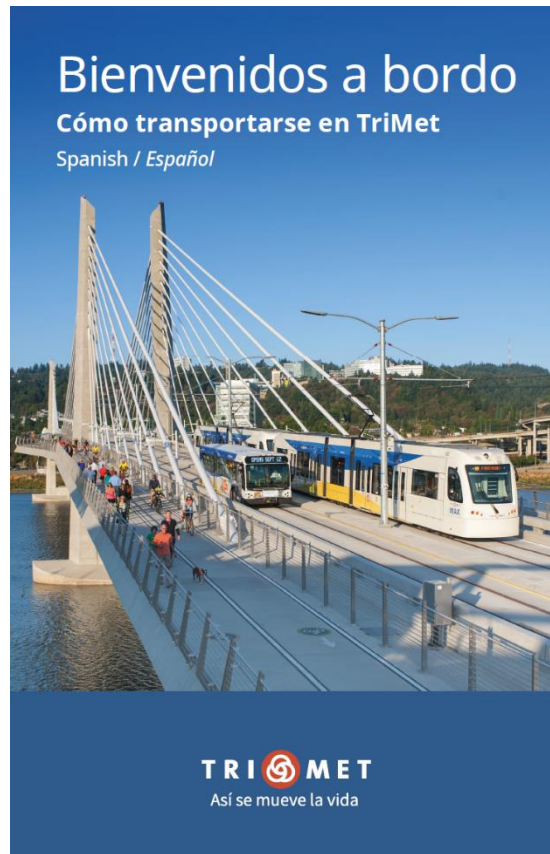



FIGURE 1-4: SPANISH VERSION OF TriMet'S
HOW TO RIDE BROCHURE



Si necesita interprete, llame al
 Nếu cần trợ giúp về thông dịch xin gọi
 如需语言帮助请致电
 Для службы языковой поддержки
 언어 통역이 필요하시면, 으로 전화 하시면 됩니다

503-238-7433

FIGURE 1-5: LANGUAGE ASSISTANCE CHANNEL CARD



Save Up to 72%

If you're 65+, have a disability or qualify based on income, you can save more with TriMet's reduced fares.

Si tienes más de 65 años, tienes una discapacidad o calificas según tus ingresos, puedes ahorrar hasta un 72% en tu pasaje de TriMet.

Если вам исполнилось 65 лет, у вас имеются ограниченные возможности здоровья или вы отвечаете требованиям дохода, вы можете сэкономить до 72%, пользуясь льготными тарифами организации TriMet.

如果您年满65岁、有残疾或基于收入符合条件，您可以通过TriMet的优惠票价最多节省72%。


Nếu quý vị 65 tuổi trở lên, bị thương tật hoặc có thu nhập hợp tiêu chuẩn, quý vị có thể tiết kiệm đến 72% với vé giảm giá của TriMet.

65세 이상이거나 장애가 있거나 소득에 따라 자격이 있는 경우, TriMet의 할인 요금으로 최대 72%까지 절약할 수 있습니다.



trimet.org/reduced

FIGURE 1-6: MULTILINGUAL HONORED CITIZEN FARE PROGRAMS CHANNEL CARD



Rules for Riding

- Don't threaten or intimidate riders or operators.
No amenace ni intimide a otros pasajeros ni al conductor.
- In the priority seating area, move for seniors and people with disabilities.
En el área de prioridad, ceda el asiento a personas de edad avanzada y personas con discapacidad.
- Don't be so loud that you disturb others.
No haga ruidos que molesten a los demás.
- Don't block the aisles or doors.
No bloquee los pasillos o puertas.
- Unless it's a service animal, your pet must be kept in a carrier.
Su mascota debe viajar en una jaula a menos que sea un animal de servicio.
- Valid and correct fare is required.
Se requiere boleto apropiado y válido.
- No eating on board, but you can bring food or drinks in closed containers.
No se permite comer a bordo. Puede transportar comida o bebidas en recipientes cerrados.




FIGURE 1-7: ENGLISH/SPANISH RULES FOR RIDING CHANNEL CARD

Board Membership and Recruitment

TriMet relies on the oversight and guidance from volunteers at every level of our agency's structure. The Board of Directors includes representatives of districts spanning the TriMet service area. The General Manager and Board also seek guidance from the Committee on Accessible Transportation (CAT). The racial/ethnic composition of the Board and CAT is shown in Table 1-3.

TABLE 1-3: TRIMET BOARD MEMBERSHIP BY RACE/ETHNICITY

	TriMet Service Area Population*	Board of Directors	Committee on Accessible Transportation
Total (#)	1,648,360	7	14
American Indian/Alaska Native	<1%	0%	7%**
Asian	9%	29%	7%
Black/African American	4%	29%	14%
Hispanic/Latino	14%	0%	7%**
Native Hawaiian/Pacific Islander	1%	0%	0%

	TriMet Service Area Population*	Board of Directors	Committee on Accessible Transportation
White (Non-Hispanic/Latino)	66%	43%	71%
Other	7%	0%	0%

*Figures do not add up to 100% due to rounding.

**One member of the CAT identifies as both American Indian/Alaska Native and Hispanic/Latino.

Source: US Census American Community Survey 2019-2023 (5-Year Estimates) Table B03002

Board and Committee Recruitment

TriMet's Board of Directors is made up of seven members appointed by the Governor of Oregon. Board members represent, and must live in, certain geographical districts. The Board sets agency policy, enacts legislation (taxing and ordinances relating to policy ordinances) and reviews certain contracts. Recruitment and appointment is done through the Governor's Executive Appointments Office.

The **Committee on Accessible Transportation (CAT)** was formed in 1985 to advise the TriMet Board of Directors and staff on plans, policies and programs for seniors and people with disabilities. CAT has 15 community members as well as one member of the TriMet Board of Directors. All CAT members are appointed by the General Manager for a two-year term. The membership recruitment process includes:

1. Notification to service agencies and organizations that serve seniors and/or people with disabilities of all races;
2. Notification to mailing list of individuals/organizations who have expressed interest in the committee's activities;
3. Specific contacts from current committee members to individuals who may be interested in serving on the committee; and
4. Placement of recruitment notice in the "Public Notice" section of a local newspaper.

Subrecipient Monitoring

As a designated recipient of FTA funds, TriMet regularly passes through funding to subrecipients and is responsible for ensuring their compliance with FTA Title VI requirements. Primary monitoring is conducted annually by the Senior Grants Compliance Analyst within the Grants Development and Compliance Department. However, ongoing oversight is also the responsibility of Project Managers overseeing the applicable Federal award.

While basic Title VI requirements are reviewed annually using FTA’s Triennial Review worksheet, a risk-based approach allows certain plan elements to be reviewed once every three years.

To support compliance, the Grants team developed a **Title VI Subrecipient Guide** (see Attachment G) and a **Title VI Subrecipient template** that tracks each subrecipient’s plan components, update history and applicability of additional requirements — such as System-wide Service Standards (for fixed-route providers) or enhanced data reporting.

If compliance issues are identified, the Senior Grants Compliance Analyst may conduct follow-up procedures and consult TriMet’s Title VI & Public Access Programs Manager. The Analyst is also responsible for submitting subrecipient Title VI information to the FTA upon request.

TriMet supports subrecipients through ongoing communications, training (as requested) and access to internal subject matter experts. Past support has included providing demographic data to help update public participation and language assistance plans.

Facilities Siting and Construction

TriMet’s process for conducting Title VI analyses related to facility siting and construction follows the guidance provided in the FTA Circular/Title 49 CFR.

Since the last Title VI Program submission in 2022, TriMet has not purchased or constructed on any property that would require this analysis.

Major Service and Fare Change Title VI Analyses

Consistent with FTA guidance, TriMet evaluates proposals for Major Service Changes and fare changes for potential Disparate Impacts and Disproportionate Burdens.

TriMet has conducted Title VI Analyses for the following since the 2022 Title VI Program submittal:

- May 2023 Service Change
- 2024 Fare Increase
- FY2024 Annual Service Plan
- FY2025 Annual Service Plan

The full reports, as well as corresponding documentation of the TriMet Board’s consideration, awareness and approval of each, are compiled and provided as Attachment H.

Part II: Title VI Policies

Policy updates from TriMet's 2022 Title VI Program

- Adding the combination of two or more transit lines into a single line to the Major Service Change definition.
- Specifying that cumulative service changes over three years reaching the 15% threshold qualify as Major Service Changes only in the event of service reductions.
- Increasing the single transit line Disparate Impact and Disproportionate Burden analyses thresholds from 3 to 5 percentage points to better capture real world differences and align with peer practice.
- Removing single transit line Disparate Impact and Disproportionate Burden analysis of service improvements to avoid the implication that increasing service on lines traveling through non-minority, non-low-income communities is not Title VI-compliant. The system-level analysis remains to ensure fair distribution of benefits of overall service proposals to minority and low-income communities.
- Simplifying the system level Disparate Impact and Disproportionate Burden analyses methodology and thresholds to mirror the single line analysis (i.e., comparing minority and low-income populations impacted to the percentage of the overall TriMet service district's population they comprise, with a 5 percentage point difference threshold). The previous policy compared the portion of the minority and low-income populations impacted by the combined Major Service Changes to the portion of the non-minority and non-low-income populations impacted, with a 20% difference threshold.
- Clarifying the fare change analysis language to better describe the intended policy.

This section provides the following policies, as approved by the TriMet Board:

1. Major Service Change Policy
2. Disparate Impact Policy
3. Disproportionate Burden Policy

These policies and the thresholds they establish are informed by community feedback gathered through a variety of outreach methods over the past 12+ years, as well as lessons learned by staff who have conducted Title VI analyses.

Major Service Change Policy

All changes in service meeting the definition of “Major Service Change” are subject to a Title VI Analysis prior to Board approval of the service change. A Title VI Analysis will be completed for all Major Service Changes and will be presented to the TriMet Board of Directors for its awareness and consideration and included in the subsequent TriMet Title VI Program report with a record of action taken by the Board.

TriMet defines a Major Service Change as any of the following:

1. A change to **15%** or more to a line’s:
 - a. **Route miles.** This includes routing changes where route miles are either increased or reduced (i.e. route changes),

OR
 - b. **Span** of service on a daily basis for the day of the week for which a change is made, as measured by revenue hours,

OR
 - c. **Cumulative frequency** of service on a daily basis for the day of the week for which a change is made as measured by revenue hours.
2. A single transit line is **split** into two or more transit lines.
3. Two or more transit lines are **combined** into a single line.
4. A **new transit route** is established as defined in the Introduction.
5. A **transit route is eliminated** or retired from service.

A Major Service Change occurs whether the above thresholds are met:

1. Within a single service proposal,

OR
2. Due to a cumulative effect of routing, span or frequency changes over the three years prior to the analysis (service reductions only).

The following service changes are exempted:

1. **Standard seasonal variations** in service or reroutes due to construction projects are not considered Major Service Changes.
2. **In an emergency situation**, a service change may be implemented immediately without a Title VI Analysis being completed. A Title VI Analysis will be completed if the emergency change is to

be in effect for more than 180 days and if the change(s) meet the definition of a Major Service Change. Examples of emergency service changes include but are not limited to those made because of a power failure for a fixed guideway system, the collapse of a bridge over which bus or rail lines pass, major road or rail construction, or inadequate supplies of fuel.

3. **Experimental service changes** may be instituted for 180 days or less without a Title VI Analysis being completed. A Title VI Analysis will be completed prior to continuation of service beyond the experimental period if the change(s) meet the definition of a Major Service Change.

Adverse Effects vs. Benefits

TriMet analyzes both adverse effects resulting from major service reductions and benefits resulting from major service improvements.

Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (hours, days and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one quarter-mile of bus stops or one half-mile of rail stations.

Disparate Impact Policy

The Disparate Impact Policy establishes a threshold and process for determining whether a given action has a potential unfair and adverse effect on minority populations.

In the event the proposed action has an adverse impact that affects minority populations at a level that exceeds the thresholds established in the adopted Disparate Impact Policy, or that unfairly denies minority populations the benefits of the service change, the finding is considered a potential Disparate Impact. Given a potential Disparate Impact, TriMet will evaluate whether there is an alternative that would serve the same objectives but more fairly. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disparate Impact Policy defines measures for determination of potential Disparate Impact on minority populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes.

Disparate Impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color or national origin.

The determination of Disparate Impact associated with service changes is defined separately for impacts of changes on individual line and for system-level impacts of changes on more than one line.

Service Reductions

TriMet considers many factors when faced with a need to reduce service, including ridership, geographic coverage and populations served. To ensure minority populations are not unfairly affected by these reductions, TriMet conducts a two-part analysis, using a **Disparate Impact threshold of 5%**:

1. **Single transit line analysis:** If the minority population living in the transit line's service area is at least 5 percentage points *higher* than the minority population in the TriMet service area as a whole (currently 34%), the line is flagged for a potential Disparate Impact.
2. **System-level analysis:** Considering all major service reductions combined, if the minority population living in the these transit lines' service areas is at least 5 percentage points *higher* than the service area's's minority population as a whole (currently 34%), the overall effect of changes is flagged for a potential Disparate Impact.

Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, health care or public parks/recreation for minority populations.

Service Improvements

TriMet considers many factors when planning service improvements, including ridership, geographic coverage and populations served. To ensure minority populations are not denied the benefits of these improvements, TriMet conducts a two-part analysis:

1. **Single transit line analysis:** A major service improvement to a transit line is flagged for a potential Disparate Impact if the improvement is linked to other service changes that have disproportionate and adverse effects on minority populations.
 - For example, if TriMet plans to re-route a transit line and double its service, but the re-route removes service from a predominantly Hispanic/Latino neighborhood that does not have alternative service, this could be considered a potential Disparate Impact.
2. **System-level analysis:** Considering all major service improvements combined, if the minority population living in the these transit lines' service areas is at least 5 percentage points *lower* than the service area's minority population as a whole (currently 34%), the overall effect of changes is flagged for a potential Disparate Impact.

Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, health care or public parks/recreation for minority populations.

Responding to Findings

Upon determination of a potential Disparate Impact, TriMet will either:

1. Alter the service proposal to avoid, minimize or mitigate potential Disparate Impacts,

OR
2. Provide a substantial legitimate justification for keeping the proposal as-is and show that there are no alternatives that would have a less Disparate Impact on minority riders but would still accomplish the project or program goals.

Fare Changes

For fare changes, a potential Disparate Impact is noted when adverse effects would impact a 10 percentage point greater share of minority riders than non-minority riders (e.g., 45% of minority riders vs. 35% of non-minority riders). Where potential adverse impacts are identified, TriMet will provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.

Disproportionate Burden Policy

The Disproportionate Burden Policy establishes a threshold and process for determining whether a given action has a potential unfair and adverse effect on low-income populations.

In the course of performing a Title VI analysis for possible Disproportionate Burden, TriMet will analyze how the proposed Major Service Change or fare change action could impact low-income populations, as compared to non-low-income populations.

In the event the proposed action has an adverse effect on low-income populations at a level that exceeds the thresholds established in the adopted Disproportionate Burden Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disproportionate Burden. Given a potential Disproportionate Burden, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more fair impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disproportionate Burden Policy defines measures for determination of potential Disproportionate Burden on low-income populations resulting from Major Service Changes or any change in fares.

The determination of Disproportionate Burden associated with service changes is defined separately for impacts of changes on individual line and for system-level impacts of changes on more than one line.

Service Reductions

TriMet's conducts a two-part analysis of major service reductions, using a **Disproportionate Burden threshold of 5%**:

1. **Single transit line analysis:** If the low-income population living in the transit line's service area is at least 5 percentage points *higher* than the low-income population in the TriMet service area as a whole (currently 16%), the line is flagged for a potential Disproportionate Burden.
2. **System-level analysis:** Considering all major service reductions combined, if the low-income population living in the these transit lines' service areas is at least 5 percentage points *higher* than the service area's low-income population as a whole (currently 16%), the overall effect of changes is flagged for a potential Disproportionate Burden.

Additional considerations to complement the quantitative Disproportionate Burden analysis above may include evaluating impacts to accessing employment, education, food, health care or public parks/recreation for low-income populations.

Service Improvements

TriMet considers many factors when planning service improvements, including ridership, geographic coverage and populations served. To ensure low-income populations are not denied the benefits of these improvements, TriMet conducts a two-part analysis:

1. **Single transit line analysis:** A major service improvement to a transit line is flagged for a potential Disproportionate Burden if the improvement is linked to other service changes that have disproportionate and adverse effects on low-income populations.
 - For example, if TriMet plans to re-route a transit line and double its service, but the re-route removes service from a Department of Human Services office that is not served by another line, this could be considered a potential Disproportionate Burden.
2. **System-level analysis:** Considering all major service improvements combined, if the low-income population living in the these transit lines' service areas is at least 5 percentage points *lower* than the service area's low-income population as a whole (currently 16%), the overall effect of changes is flagged for a potential Disproportionate Burden.

Additional considerations to complement the quantitative Disproportionate Burden analysis above may include evaluating impacts to accessing employment, education, food, health care or public parks/recreation for low-income populations.

Responding to Findings

Upon determination of a potential Disproportionate Burden, TriMet will either:

1. Alter the service proposal to avoid, minimize or mitigate potential Disproportionate Burdens,

OR

2. Provide a substantial legitimate justification for keeping the proposal as-is and show that there are no alternatives that would have a less Disproportionate Burden on low-income riders but would still accomplish the project or program goals.

Fare Changes

For fare changes, a potential Disproportionate Burden is noted when adverse effects would impact a 10 percentage point greater share of low-income riders than non-low-income riders (e.g., 32% of low-income riders vs. 22% of non-low-income riders). Where potential adverse impacts are identified, TriMet will provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.

Public Participation Informing Title VI Analysis

TriMet has engaged riders multiple times to inform the Major Service Change, Disparate Impact and Disproportionate Burden policies since the FTA published Circular 4702.1B in 2012, including focus groups, open houses and surveys. This has resulted in making thresholds more sensitive as well as expanded considerations to include access to jobs, education, food, health care, parks, public recreation and green spaces when performing a Title VI analysis. Moreover, riders support a population-based approach (i.e., looking at the low-income and minority population living by transit lines proposed for changes was a good way to measure potential impacts).

Feedback on this Program and the policies therein generally did not differ between how TriMet should treat analysis of disparities based on race (Disparate Impact) and income (Disproportionate Burden). Thus, the two policies remain equivalent.

Part III: System-Wide Service Policies and Standards

TriMet has established standards and policies as set forward in FTA Circular 4702.1B.

Standards:

- Vehicle Loads
- Service Frequency
- On-Time Performance
- Service Availability

Policies:

- Distribution of Amenities
- Vehicle Assignment

These standards and policies assist in guiding the development and delivery of service in support of TriMet's mission to provide valued transit service that is safe, dependable and easy to use. They also provide benchmarks to ensure that service design and operations practices do not result in discrimination on the basis of race, color or national origin. They establish a basis for monitoring and analysis of service delivery, availability, and the distribution of amenities and vehicles to determine whether or not any Disparate Impacts are evident.

Each standard and policy is described, following. Part IV: Service Monitoring provides the analysis of performance/outcomes for each respective standard and policy, comparing the service and amenities provided for minority and non-minority populations, and low-income and non-low-income populations, respectively.

Standard — Vehicle Loads

Standards for passenger capacity are used to determine if a bus or train is overcrowded. Table 3-1 shows passenger capacities for buses, light rail cars and commuter rail cars as the average maximum numbers of persons seated and standing during the peak one-hour in the peak direction. Maximum load factors represent the maximum achievable capacity and are calculated by dividing the total capacity by the seated capacity of the vehicle.

Vehicle passenger load is measured by the average load and the ratio of average load to seated capacity (load/seat ratio) during weekday a.m. peak, midday and p.m. peak periods, respectively. Maximum load factors should not be exceeded during any period, including a.m. and p.m. peak periods on weekdays when highest passenger loads are typically experienced.

Bus and MAX loads are monitored using automatic passenger counters linked to vehicle location technology. WES passenger counts are taken by a train crew member.

TABLE 3-1: VEHICLE CAPACITIES BY MODE AND TYPE

Vehicle Type	Maximum Achievable Capacity	Seated	Standing	Maximum Load Factor
29-ft. Bus	40	23	17	1.7
40-ft. Bus	56	39	17	1.4
60-ft. Bus	91	46	45	2.0
MAX 1-Car Train	133	64	69	2.1
MAX 2-Car Train	266	128	138	2.1
WES 1-Car Train	70	70	0	1.0
WES 2-Car Train	146	146	0	1.0

Standard — Service Frequency

Vehicle headway is the measurement of the frequency of service and is the scheduled time between two vehicles traveling in the same direction on the same line at a given location.

TriMet headway standards for lines designated as “frequent service” is that these lines should operate 15-minute or better service for most of the day, seven days a week.

In 2003, TriMet worked with stakeholders and adopted criteria to guide the expansion of frequent service. The most important factor in the criteria is potential ridership, but another consideration is the density of transit-dependent population as measured by proportion of low-income residents, seniors or persons with disabilities. To meet the criteria for frequent service, a line must be projected to generate high ridership and serve areas with:

- High employment/population density;
- Streets that are friendly to pedestrians and transit service;
- A high proportion of transit dependent population and activities; and/or

- Meet other criteria specified in TriMet’s Service Guidelines Framework.

Seventeen bus lines and all five MAX lines are considered frequent service. TriMet has not adopted headway standards for lines that do not meet the criteria for frequent service; however, at minimum, lines should operate with headways of no more than 60 minutes during weekday peak periods.

Given that MAX lines and frequent service bus lines are designed and operated to serve maximum ridership, these lines also serve above-average shares of minority and poverty populations. Frequent service bus lines and all MAX lines taken together serve 68% of the population of the TriMet service district (about 1,088,000 of a total of 1.6 million). Among minority populations living in the TriMet service area, 75% are served by at least one Frequent Service line, while 88% of people living with a low-income are served by at least one Frequent Service line.

Standard — On-Time Performance

TriMet has established measures and standards for on-time performance of bus, MAX light rail and WES commuter rail service. For bus and MAX service, on-time is defined as vehicle arrivals no more than one minute before to five minutes after scheduled time at all points. TriMet’s on-time performance objective is 90% or greater. TriMet continuously monitors for on-time performance and system results are included as part of monthly performance reports covering all aspects of operations. For WES commuter rail, train arrivals at the respective end-of-line stations are noted and all arrivals no more than four minutes before or after the scheduled time are considered as on-time.

Standard — Service Availability

TriMet’s standard for availability of service is that persons residing within one-half mile of bus stops and/or rail stations are considered served. Service availability is expressed as number and percentage of the population in TriMet’s service district and is determined by mode: for bus, MAX and WES, respectively. The calculation of distance is based on June 2025 stop locations and the residential address points within a half-mile buffer around stops. There is no absolute standard for service availability. However, the expectation in the context of Title VI is that the share of minority population within the TriMet service district with service availability should be no less than the share of non-minority populations with service availability.

Amenity Placement Guidelines

TriMet has written guidelines that form a framework for the deployment of amenities as part of its projects and programs. The following sections briefly summarize the major policy documents that govern the deployment of amenities on TriMet transit system. Note that the use of the term “amenities” is limited to the Title VI definition for the purposes of this document. This section is generally organized by mode, but also includes a summary of customer information deployment policy. It should also be

noted that project development often requires a scope of deliberation regarding amenities placement to include considerations not accounted for in these written policies.

Bus Stop Classification Guidelines

It is important that bus stops are easily identifiable, safe, accessible and a comfortable place to wait for the bus. TriMet's Bus Stop Classification Guidelines⁵ (Figure 3-1) identify elements of the TriMet bus stop, set guidelines for the design of bus stops and the placement of bus stop amenities, and describe the process for managing and developing bus stops.






Stop Type	Illustration	Externally Managed Features	Potential Bus Stop Features	Stop Conditions & Usage
Under-Developed		No clear pedestrian access; no logical, safe street crossing; constrained topography	No pavement; inadequate shoulder; visibility blocked; poor lighting; insufficient ADA clearances; exposure to weather/traffic; shared pole	Poor, or lack of, supporting land uses; few or no boarding rides; closely spaced with another stop
Basic		Legal street crossing (corner ramps); sidewalk or safe shoulder access	Pavement meets ADA clearances; most bus stop signs on dedicated poles; free standing bench	All stops meeting siting criteria
Level 1		<i>Preceding features plus:</i> sidewalk connections; curb extensions; crosswalks	<i>Preceding features plus:</i> Standard (A or B) shelter (larger if justified); shelter lighting; rear door landing when physically possible	High use stops (50+ Ons/day); significant employer program participant; apartments; institutions; hospitals; shopping centers; major business; stops with significant usage by riders who are disabled or elderly
Level 2		<i>Preceding features plus:</i> transit plazas and active public space	<i>Preceding features plus:</i> double B or higher capacity shelter; printed schedule; trash can; additional free standing bench	Major stops (150+ Ons/day); transfer points; stops with significant bus ramp usage
Level 3		<i>Preceding features plus:</i> concession or nearby shop(s); landscaping; robust public and pedestrian infrastructure	<i>Preceding features plus:</i> high capacity shelter; free standing bench(s); bike storage lockers; artwork elements	High Capacity Stops (250+ Ons/day) Bus Rapid Transit service; transit centers; major transfer hubs; transit mall

FIGURE 3-1: BUS STOP CLASSIFICATION GUIDELINES

Light Rail (“MAX”) Station Design

TriMet's Design Criteria governs the design of light rail projects including requirements for amenities. The following is a summary of the deployment requirements by type of amenity.

Seating: Provide benches on platforms and in bus waiting areas (associated with light rail stations); benches are to be 5 feet in length with a mid-armrest.

⁵ As of writing, these guidelines are being updated.

Shelters/Canopies: Criteria text does not specifically require the provision of shelters, but practice has been to provide cover at light rail stations. Cover is often provided by one or more stand-alone shelters on the platform but has also been provided by cover mounted to adjacent buildings. Stand-alone shelters vary in size. Two stand-alone shelters are the most typical practice, but single stand-alone structures and building-mounted canopies have also been used.

Escalators: There are no escalators on TriMet’s system. As such, there are no specific criteria related to their deployment.

Elevators: Criteria reference the ADA with respect to deployment of elevators. In practice, TriMet seeks to limit deployment of elevators to only those situations where specifically required by ADA and/or necessary because of project constraints. This is due to security and maintenance concerns.

Trash cans: Criteria requires deployment of two 33-gallon “waste receptacles” (trash cans) at all light rail station platforms. While no standard product is cited, criteria includes an extensive list of performance characteristics, including 20-year life expectancy, low-life cycle cost, high quality design, security and other considerations that in practice result in high-quality receptacles being consistently deployed.

Commuter Rail (“WES”) Design

TriMet has one commuter rail line. There is no mode-specific policy guidance for amenities associated with commuter rail. In practice, the design of the WES project considered the light rail design criteria and followed them where practical, relevant and possible in consideration of the other constraints of the project. See Light Rail Station Design, preceding, for a summary.

Customer Information

TriMet’s Design Criteria, which governs the design of light rail projects and is also a key reference for Commuter Rail, contains the bulk of requirements for customer information items such as signage and other visuals. TriMet’s Bus Stops Guidelines govern the design of bus stops and contains considerations for customer information. Subsections below summarize typical customer information deployment practices by mode. In addition to these practices, TriMet also considers unique usage factors, transfer locations, service frequency, schedule reliability, special needs and the specific location of a given stop along a route when identifying placement of customer information amenities.

Bus

Bus catcher information displays (BCIDs): Displays include route number; route name; direction; route-specific maps; route schedules; stop name; Stop ID numbers for use with TransitTracker™ via phone, text or at trimet.org; and call-to-action. BCIDs are placed at bus stops with minimum boarding rides of 100 per day and at transit centers where multiple bus lines converge, as well as rail stations at some locations.

Variable stop ID signs: Signs include route number; route name; direction; stop name; Stop ID number for use with TransitTracker™ via phone, text or trimet.org; and call-to-action. These signs are located at bus stops where a standard blue bus stop pole and/or shelter unit is unable to be installed due to existing environmental constraints.

Pole-mounted information displays: Displays include route number; route name; direction; stop name; simple route map; Stop ID number for use with TransitTracker™ via phone, text or trimet.org; and call-to-action. These displays are placed at all bus stops without BCIDs or variable stop ID signs.

Digital displays: Digital displays containing real-time bus arrival information are located throughout the system at over 350 stops and counting.

Light and Commuter Rail

Pylon information displays: Two-side or four-sided displays include a rail-specific map; route schedules or frequency charts; Stop ID numbers for use with TransitTracker™ via phone, text or trimet.org; and call-to-action. These displays are placed at all MAX and WES stations.

Digital displays: Displays placed along rail/fixed guideway platforms at all stations.

Vehicle Assignment

Assigning vehicles to routes involves several considerations. Vehicles are domiciled at each of the three bus operations facilities (referenced as Center, Powell and Merlo). For buses, ridership is the primary determinant, so those communities with the greatest need for, and use of, transit generally are served by newer vehicles. TriMet's bus fleet, as of August 2025, includes 668 buses, all of which are low-floor and are equipped with automated stop announcement systems.

Bus assignments also take into account the various lengths of buses, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 30-foot buses rather than the 40-foot buses. Some routes requiring tight turns on narrow streets are best operated with 30-foot rather than 40-foot buses.

For MAX light rail, vehicles are based at each of the two rail operations facilities (referenced as Ruby Junction and Elmonica) and are assigned to respective rail lines based on lines served by the facility, daily car availability and operational efficiency. TriMet's light rail fleet includes 148 vehicles of which 132 are low-floor. All cars are equipped with air conditioning. High-floor cars are always paired with a low-floor car to provide ADA accessibility.

TriMet's WES commuter rail fleet includes three self-powered diesel-multiple units (DMUs) and one "trailer" non-powered car, which were built in 2007 and placed in operation with the start of WES service in 2009. Two additional cars (a "married pair") were built in 1952 and 1953, and they were placed in operation in 2011.

In regard to assessing the results of TriMet's vehicle assignment practices in the context of Title VI, the policy is that the average age of vehicles on "minority lines" should be no more than the average age of vehicles on "non-minority" lines. Additionally, TriMet has set the expectation that the average age of vehicles on "low-income lines" should be no more than the average age of vehicles on "non-low-income" lines.

As of August 2025, TriMet operates 34 completely electric buses serving lines 6, 20 and 62, which are considered minority lines. As TriMet looks to phase in all zero-emissions buses, the assignment strategy will consider how these vehicles are deployed throughout the service area to ensure fair distribution.

From the Title VI Circular

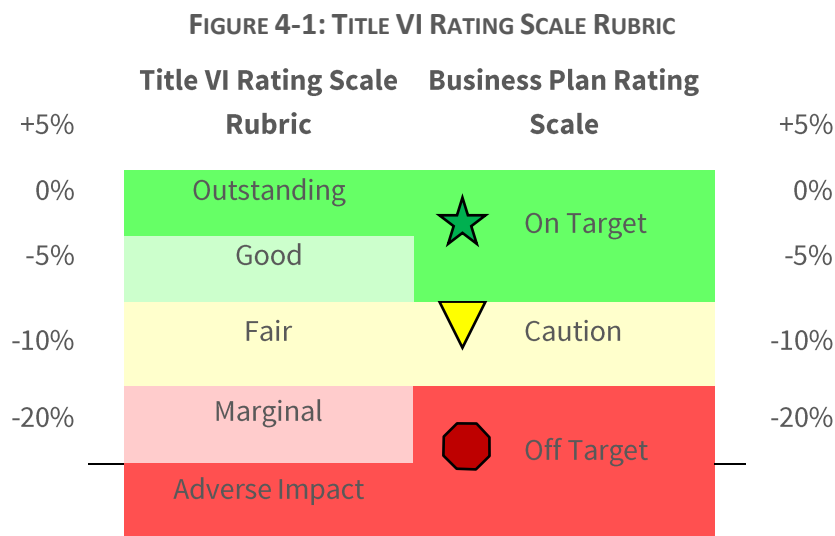
Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition.

Part IV: Service Monitoring

Part of TriMet’s compliance with FTA Circular 4702.1B is ongoing performance monitoring across all modes of service (bus, MAX and WES). This monitoring is meant to ensure that TriMet is providing service in a way that does not discriminate on the basis of race, color or national origin.

As shown in Figure 4-1, the Title VI rating scale rubric ranges between “outstanding,” “good,” “fair,” “marginal” and “adverse impact”. To receive an “outstanding” score, access or service distribution for minority and low-income must be good as or better than non-minority and higher income for each measure.

A performance finding within the 5% threshold is considered “good.” The target for TriMet’s Business Plan objective is within 5% or better. A greater than 5% but less than 10% difference equates to “fair.” Above the 10% threshold but within 20% would result in a “marginal” score. A marginal score would be flagged as a caution and area for improvement. Any measure that exceeds 20% would indicate “adverse impact” and would result in a system-wide Disparate Impact and/or Disproportionate Burden finding per the FTA.



TriMet monitors the following service and performance metrics:

- “Minority” and “non-minority” lines
- “Low-income” and “non-low-income” lines
- Service frequency and span
- On-time performance

- Vehicle loads
- Service availability
- Stop amenities
- Vehicle assignment

Minority & Non-minority Lines

“Minority” lines, as defined by the FTA, are lines that provide at least one-third of their service in block groups that are above-average minority population for the TriMet service district. “Non-minority” lines are all others. Currently, TriMet operates a total of 86 lines, including 79 bus lines, 5 MAX light rail lines and 1 WES commuter rail line. Of these, 48 bus lines, 3 MAX lines and WES commuter rail are considered minority lines. As of summer 2025, minority lines account for 62% of TriMet system service (measured by revenue hours). TriMet generally aligns service with mobility needs and ridership, thus lines serving areas with above-average minority populations typically have higher ridership and therefore a higher overall level of service than non-minority lines.

Low-income & Non-low-income Lines

“Low-income” lines, as defined by the FTA, are lines that provide at least one-half of their service in block groups that are above-average low-income population. “Non-low-income” lines are all others. Currently, 46 bus lines, 5 MAX lines and the WES commuter rail are considered low-income lines and accounted for 78% of TriMet’s service in the summer of 2025. As of summer 2025, low-income lines accounted for 61% of TriMet system service (measured by revenue hours). TriMet generally aligns service with mobility needs and ridership, thus lines serving areas with above-average low-income populations typically have higher ridership and therefore a higher overall level of service than non-low-income lines.

Service Frequency & Span

TriMet analyzes service frequency (how often the service arrives) and span (hours of service) for each mode (bus, MAX, WES), day of service (weekday, weekend) and line classification (minority/non-minority and low-income/non-low-income).

Minority/Non-minority Comparison

The analysis for summer 2025 service, shown in Tables 4-1 and 4-2, finds **no Disparate Impact** in terms of frequency and span:

1. Average scheduled frequency is greater on minority lines than service on non-minority lines across all modes and days, with one exception: the two non-minority MAX lines run more frequently in the evenings than the minority MAX lines, both on weekdays and weekends.
2. Average scheduled span is greater on minority lines than non-minority lines, across all modes and days.

TABLE 4-1: FREQUENCY AND SPAN OF SERVICE (WEEKDAYS)

MINORITY AND NON-MINORITY TRANSIT LINES BY MODE

SUMMER 2025

		TriMet System		Bus		MAX Light Rail		WES Commuter Rail (Minority Line)
WEEKDAY SERVICE		Minority	Non-minority	Minority	Non-minority	Minority	Non-minority	
Lines in Service		52	33	48	31	3	2	1
Average Frequency (minutes)	Early Morning	0:31	0:47	0:32	0:48	0:19	0:30	0:45
	Day	0:30	0:46	0:32	0:47	0:15	0:15	0:45
	Evening	0:33	0:39	0:34	0:40	0:18	0:15	0:45
	Night	0:35	0:42	0:36	0:44	0:21	0:23	N/A
Span (hours)		16.3	14.9	15.9	14.5	22.1	20.7	6.0

*Per the Federal Transit Administration, “minority” lines serve routes that provide at least 1/3 of their service in block groups that are above-average minority population for the TriMet service district. “Non-minority” lines are all others

TABLE 4-2: FREQUENCY AND SPAN OF SERVICE (SATURDAYS AND SUNDAYS)

MINORITY AND NON-MINORITY TRANSIT LINES BY MODE

SUMMER 2025

SATURDAY & SUNDAY SERVICE		TriMet System		Bus		MAX Light Rail		WES Commuter Rail (Minority Line)
		Minority	Non-minority	Minority	Non-minority	Minority	Non-minority	
Lines in Service		38	21	35	19	3	2	0
Average Frequency (minutes)	Early Morning	0:31	0:38	0:32	0:38	0:22	0:31	N/A
	Day	0:29	0:36	0:30	0:37	0:15	0:17	N/A
	Evening	0:32	0:38	0:34	0:39	0:20	0:15	N/A
	Night	0:36	0:38	0:37	0:41	0:25	0:26	N/A
Span (hours)		16.7	15.6	16.4	15.3	22.1	20.7	N/A

*Per the Federal Transit Administration, “minority” lines serve routes that provide at least one-third of their service in block groups that are above-average minority population for the TriMet service district. “Non-minority” lines are all others.

Low-income/Non-low-income Comparison

The analysis for summer 2025 service, shown in Tables 4-3 and 4-4, finds **no Disproportionate Burden** in terms of service frequency and span:

1. Average scheduled frequency is greater on low-incomes lines than non-low-income lines across all modes and days.
2. Average scheduled span is greater on low-incomes lines than non-low-income lines across all modes and days.

TABLE 4-3: FREQUENCY AND SPAN OF SERVICE (WEEKDAYS)

LOW-INCOME AND NON-LOW-INCOME TRANSIT LINES BY MODE

SUMMER 2025

WEEKDAY SERVICE		TriMet System		Bus		MAX Light Rail		WES Commuter Rail (Low-income Line)
		Low- income	Non-low- income	Low-income	Non-low- income	Low- income	Non-low- income	
Lines in Service		52	33	46	33	5	0	1
Average Frequency (minutes)	Early Morning	0:33	0:42	0:33	0:42	0:27	N/A	0:45
	Day	0:28	0:56	0:29	0:56	0:15	N/A	0:45
	Evening	0:29	0:40	0:31	0:40	0:15	N/A	0:45
	Night	0:35	0:41	0:38	0:41	0:20	N/A	N/A
Span (hours)		16.9	13.9	16.4	13.9	21.5	N/A	6.0

*Per the Federal Transit Administration, “low-income” lines serve routes that provide at least one-half of their service in block groups that are above-average low-income population for the TriMet service district. “Non-low-income” lines are all others.

TABLE 4-4: FREQUENCY AND SPAN OF SERVICE (SATURDAYS AND SUNDAYS)

LOW-INCOME AND NON-LOW-INCOME TRANSIT LINES BY MODE

SUMMER 2025

		TriMet System		Bus		MAX Light Rail		WES Commuter Rail (Low-income Line)
SATURDAY & SUNDAY SERVICE		Low- income	Non-low- income	Low-income	Non-low- income	Low- income	Non-low- income	
Lines in Service		40	19	35	19	5	0	0
Average Frequency (minutes)	Early Morning	0:34	0:42	0:35	0:42	0:30	N/A	N/A
	Day	0:26	0:39	0:28	0:39	0:17	N/A	N/A
	Evening	0:29	0:37	0:31	0:37	0:15	N/A	N/A
	Night	0:35	0:43	0:36	0:43	0:24	N/A	N/A
Span (hours)		16.8	15.4	16.4	15.4	21.5	N/A	N/A

On-time Performance

TriMet monitors on-time performance on bus and MAX through CAD-AVL systems and by direct observation on WES. TriMet defines “on-time” as no more than five minutes late or one minute early.

Minority/Non-minority Comparison

The on-time performance Title VI analysis for spring 2025 service, shown in Table 4-5, finds **no Disparate Impact** on minority riders:

- 1. Bus on-time performance is similar between minority and non-minority lines (no more than a 1% difference). This is within the 0-5% “outstanding” range on the Title VI Rubric.
- 2. MAX on-time performance is similar between minority and non-minority lines (no more than a 3% difference). This is within the 0-5% “outstanding” range on the Title VI Rubric.
- 3. On-time performance for WES, a minority line, is 99%.

TABLE 4-5: SPRING 2025 ON-TIME PERFORMANCE COMPARISON

MINORITY AND NON-MINORITY LINES

		Avg. % On-Time*		
Mode of Service	Day	Minority Lines	Non-Minority Lines	Difference; Minority to Non-Minority +/-(-)
Bus	Weekday	86%	86%	0%
	Saturday	85%	86%	(1%)
	Sunday	91%	91%	0%
MAX Light Rail	Weekday	82%	83%	(1%)
	Saturday	79%	79%	0%
	Sunday	78%	81%	(3%)
WES Commuter Rail	Weekday	99%	N/A	N/A

* Weighted by hours in service. For Bus and MAX service, a vehicle is considered “on time” if it departs no more than 1 minute before to 5 minutes after the scheduled time measure at time points. For WES, trains that arrive at the end-of-line stations (Beaverton Transit Center or Wilsonville) no more than 4 minutes before or after the scheduled time are considered “on time.”

Low-income/Non-low-income comparison

The on-time performance Title VI analysis for spring 2025 service, as shown in Table 4-6, finds **no Disproportionate Burden** on low-income riders:

1. On-time performance is similar between low-income and non-low-income lines (no more than 2% difference). This is within the 0-5% “outstanding” range on the Title VI Rubric.
2. Average on-time performance for MAX, all low-income lines, ranges from 79% on weekends to 82% on weekdays.
3. On-time performance for WES, a low-income line, is 99 %.

TABLE 4-6: SPRING 2025 ON-TIME PERFORMANCE COMPARISON

LOW-INCOME AND NON-LOW-INCOME LINES

		Avg. % On-Time*		
Mode of Service	Day	Low-income Lines	Non-low-income Lines	Difference; Low-income to Non-low-income +/-
Bus	Weekday	86%	86%	0%
	Saturday	85%	87%	(2%)
	Sunday	91%	92%	(1%)
MAX Light Rail	Weekday	82%	N/A	N/A
	Saturday	79%	N/A	N/A
	Sunday	79%	N/A	N/A
WES Commuter Rail	Weekday	99%	N/A	N/A

*Weighted by hours in service. For Bus and MAX service, a vehicle is considered “on time” if it departs no more than 1 minute before to 5 minutes after the scheduled time measure at time points. For WES, trains that arrive at the end-of-line stations (Beaverton Transit Center or Wilsonville) no more than 4 minutes before or after the scheduled time are considered “on time.”

Service Availability (Proximity to Service)

TriMet considers the population living within one half-mile of bus stops and/or rail stations as having service available. Table 4-7 shows population counts and percentages of those within this half-mile range by minority and income status. This is also delineated by type of service, i.e. bus, MAX and WES; and Frequent Service bus and MAX.

Minority/Non-minority Comparison

The service availability analysis for summer 2025, as shown in Table 4-8, finds **no Disparate Impact** on minority riders. A greater percentage of minority populations are located within one-half mile of all modes of service than non-minority populations, including 76% who live near a Frequent Service bus or MAX line (compared to 69% for the non-minority population).

Low-income/Non-low-income Comparison

The service availability analysis for summer 2025, as shown in Table 4-9, finds **no Disproportionate Burden** on low-income riders. A greater percentage of low-income populations are located within one-half-mile of all modes of service than non-low-income populations, including 89% who live near a Frequent Service bus or MAX line (compared to 67% for the non-low-income population).

TABLE 4-7: PROXIMITY TO TRIMET SERVICE

		TriMet service district		% within 1/2 mile* of...			Frequent Service	
		Totals (#)	Totals (%)	Bus	MAX	WES	Bus	Bus & MAX
Race/ethnicity	Total	1,648,360	100.0%	87.0%	16.3%	0.9%	54.7%	71.0%
	All Minorities	563,067	34.2%	88.0%	18.6%	1.3%	57.0%	75.7%
	White (Non-Hispanic)	1,085,294	65.8%	86.5%	15.1%	0.7%	53.5%	68.7%
Income	Total population with known income**	1,627,239	100.0%	87.0%	16.2%	1.0%	54.6%	70.8%
	Low-income	266,534	16.4%	93.3%	22.6%	1.3%	66.8%	89.3%
	Above low-income	1,360,705	83.6%	85.7%	15.0%	0.9%	52.2%	67.2%

Sources: TriMet GIS, Metro Regional Land Information System and US Census American Community Survey Tables: 2019-2023 (5-Year Estimates) Populations of block groups that are only partially within the TriMet district were adjusted using residential address points from the Oregon Metro Master Address File.

*Distance calculations based on December 2024 stop and station locations.

**Population totals for the TriMet district vary between statistics for race and income/poverty because the ACS total excludes those whom poverty status is not determined.

Vehicle Loads

TriMet monitors vehicle loads to determine whether buses and trains are overcrowded and, if so, whether minority and/or low-income riders are experiencing crowding at disproportionate levels.

Minority/Non-minority Comparison

The vehicle load analysis for spring 2025 service, as shown in Table 4-8, finds **no Disparate Impact** on minority riders — across all modes, time periods and line classifications (i.e., minority vs. non-minority), average load/seat ratios range from a low of 23% to a high of 51%. This is well below capacity for each vehicle.

TABLE 4-8: SPRING 2025 VEHICLE LOADS COMPARISON

MINORITY AND NON-MINORITY LINES

Vehicle Type	Time Period	Minority Lines		Non-Minority Lines	
		Avg. Load/Seat Ratio	Avg. Maximum Load	Avg. Load/Seat Ratio	Avg. Maximum Load
Bus (23, 39, or 46 seats)	AM Peak*	47%	18	42%	16
	PM Peak*	51%	20	40%	16
MAX Light Rail (64 or 128 seats)	AM Peak	37%	48	37%	48
	PM Peak	48%	63	36%	46
WES Commuter Rail (146 seats)	All	23%	34	N/A	N/A

*AM Peak = 7:00 - 8:59 am; PM Peak = 4:00 - 5:59pm

**Weighted by hours in service.

Low-income/Non-low-income Comparison

The vehicle load analysis for spring 2025 service, as shown in Table 4-9, finds **no Disproportionate Burden** on low-income riders — across all modes and time periods, average load/seat ratios range from a low of 23% to a high of 52%. This is well below capacity for each vehicle.

TABLE 4-9: SPRING 2025 VEHICLE LOADS COMPARISON

LOW-INCOME AND NON-LOW-INCOME LINES

Vehicle Type	Time Period	Low-income Lines		Non-low-income Lines	
		Avg. Load/Seat Ratio	Avg. Maximum Load	Avg. Load/Seat Ratio	Avg. Maximum Load
Bus (23, 39, or 46 seats)	AM Peak*	47%	19	40%	15
	PM Peak*	52%	20	38%	15
MAX Light Rail (64 or 128 seats)	AM Peak	37%	48	N/A	N/A
	PM Peak	46%	60	N/A	N/A
WES Commuter Rail (146 seats)	All	23%	34	N/A	N/A

*AM Peak = 7:00 - 8:59 am; PM Peak = 4:00 – 5:59pm

**Weighted by hours in service.

Stop Amenities

TriMet analyzes the distribution of stop amenities in the TriMet system (shelters, seating, waste receptacles, et al.) in order to identify any potential disparities.

Minority/Non-minority Comparison

The stop amenity analysis for summer 2025, as shown in Table 4-10, finds **no Disparate Impact** on minority riders: the percentage of stops containing each amenity on minority lines exceeds the percentage for non-minority lines in all categories examined with the exception of lighting, which is higher for non-minority lines (60% compared to 56% of stops). This 4% difference is within the “outstanding” range on the Title VI Rubric.

TABLE 4-10: SUMMER 2025 STOP AMENITY COMPARISON

MINORITY AND NON-MINORITY LINES

Category of Amenity	Pct. of Stops with Amenity on Minority Lines	Pct. of Stops with Amenity on Non-Minority Lines	Difference; Minority to Non-Minority +/-(-)
Seating	39%	26%	13%
Lighting	56%	60%	(4%)

Category of Amenity	Pct. of Stops with Amenity on Minority Lines	Pct. of Stops with Amenity on Non-Minority Lines	Difference; Minority to Non-Minority +/-(-)
Elevators	<1%	<1%	0%
Digital Displays	12%	7%	5%
Shelters	22%	13%	9%
Signs, Maps and/or Schedules	87%	80%	7%
Waste Receptacles	18%	12%	6%

Low-income/Non-low-income Comparison

The stop amenity analysis for summer 2025, as shown in Table 4-11, finds **no Disproportionate Burden** on low-income riders: the percentage of stops containing each amenity on low-income lines exceeds the percentage for non-low-income lines in all categories examined with the exception of lighting, which is slightly higher for non-low-income lines (59% compared to 57% of stops). This 2% difference is within the “outstanding” range on the Title VI Rubric.

TABLE 4-11: SUMMER 2025 STOP AMENITY COMPARISON

LOW-INCOME AND NON-LOW-INCOME LINES

Category of Amenity	Pct. of Stops with Amenity on Low-Income Lines	Pct. of Stops with Amenity on Non-Low-Income Lines	Difference; Low-Income to Non-Low-Income +/-(-)
Seating	38%	26%	12%
Lighting	57%	59%	(2%)
Elevators	<1%	0%	<1%
Digital Displays	14%	4%	10%
Shelters	24%	8%	16%
Signs, Maps and/or Schedules	86%	80%	6%
Waste Receptacles	20%	8%	12%

Vehicle Assignment

The vehicle assignment analysis compares the average ages of TriMet vehicles serving minority, non-minority, low-income and non-low-income lines. For bus and MAX, average age is calculated by weighting the age of vehicles by the number of hours in service. For WES, the age of primary and spare vehicles are listed separately because vehicle assignment is done differently than for the other modes.

Minority/Non-minority Comparison

The vehicle assignment Title VI analysis for spring 2025 service, as shown in Table 4-12, finds **no Disparate Impact** on minority riders:

- 1. On average, buses serving minority lines are about 5 months newer than buses serving non-minority lines (8.4 years old vs. 8.8 years old, respectively).
- 2. On average, MAX vehicles serving minority lines are about 7 months newer than MAX vehicles serving non-minority lines (21.9 years old vs. 22.5 years old, respectively).
- 3. For WES, TriMet does not maintain a detailed database of specific vehicles used for specific trips. The four main vehicles used for WES service were all built in 2007; the remaining two were built in 1952 and 1953 and are typically used as spares. WES is a non-minority line.

TABLE 4-12: SPRING 2025 VEHICLE AGE COMPARISON

MINORITY AND NON-MINORITY LINES

Average Age of Vehicles (years)			
Mode of Service	Minority Lines	Non-Minority Lines	Difference; Minority to Non-Minority +/-
Bus	8.4	8.8	(0.4)
MAX Light Rail	21.9	22.5	(0.6)
WES Commuter Rail	Primary: 18.5 Spares: 73	N/A	N/A

Low-income/Non-low-income Comparison

The vehicle assignment Title VI analysis for spring 2025 service, as shown in Table 4-13, finds **no Disproportionate Burden** on low-income riders:

- 1. On average, buses serving low-income lines are over a year newer than buses serving non-low-income lines (8 years old vs. 9.2 years old, respectively).
- 2. MAX vehicles (all low-income lines) are 22.1 years old on average.
- 3. For WES, TriMet does not maintain a detailed database of specific vehicles used for specific trips. The four main vehicles used for WES service were all built in 2007; the remaining two were built in 1952 and 1953 and are typically used as spares. WES is a non-minority line.

TABLE 4-13: SPRING 2025 VEHICLE AGE COMPARISON

LOW-INCOME AND NON-LOW-INCOME LINES

Mode of Service	Average Age of Vehicles (years)		Difference; Low-income to Non-low-income +/-
	Low-income Lines	Non-low-income Lines	
Bus	8.0	9.2	(1.2)
MAX Light Rail	22.1	N/A	(0.6)
WES Commuter Rail	Primary: 15.5 Spares: 70.0	N/A	N/A

Summary of Findings: Service Monitoring

As summarized in Table 4-14, TriMet finds **no disparities in terms of performance that would indicate lesser service provision to minority or low-income populations.**

TABLE 4-14: SERVICE MONITORING RESULTS SUMMARY

Metric	Disparate Impact?	Disproportionate Burden?
Service Frequency & Span	NO	NO
On-time Performance	NO	NO
Service Availability	NO	NO
Vehicle Loads	NO	NO
Stop Amenities	NO	NO
Vehicle Assignment	NO	NO

Part V: Demographic Analysis

TriMet uses demographic data to assess fairness in distribution of services, facilities and amenities in relation to minority, low-income and limited English proficient (LEP) populations. Such data informs TriMet in the early stages of service, facilities and program planning, enabling TriMet to monitor ongoing service performance, analyze the impacts of policies and programs on these populations, and take appropriate measures to avoid or mitigate potential disparities. TriMet develops GIS maps and comparative charts to perform this analysis, relying on both ridership and population data within the service area.

This analysis relies on data from the following sources:

- 2019-2023 American Community Survey (ACS) — for population analysis
- 2025 TriMet Attitudes & Awareness Survey — for rider analysis

Current Service and Service Area

Service and Service Area in Figure 5-1 shows all TriMet bus and rail lines, differentiated by frequent service lines and standard service lines.

The maps shown in Figures 5-2 to 5-4 display the distribution of minority, low-income and LEP populations in relation to services throughout the TriMet service area.

Summary

- The TriMet service area's **minority population** is about 34%, an increase from 31% in 2022. Most areas with higher concentration of minority populations are distributed across the western, eastern and northern parts of the service area.
- The TriMet service area's **low-income population** is about 16%, which is a slight decrease from 17% in 2022. While low-income populations live throughout the TriMet service area, they are more highly concentrated on the east side of the Willamette River (Multnomah and Clackamas Counties) than the west (primarily Washington County).
- The TriMet service area's **LEP population** is about 7%, similar to 2022. LEP households are generally concentrated in the east and west areas of the service area.

Service and Service Area

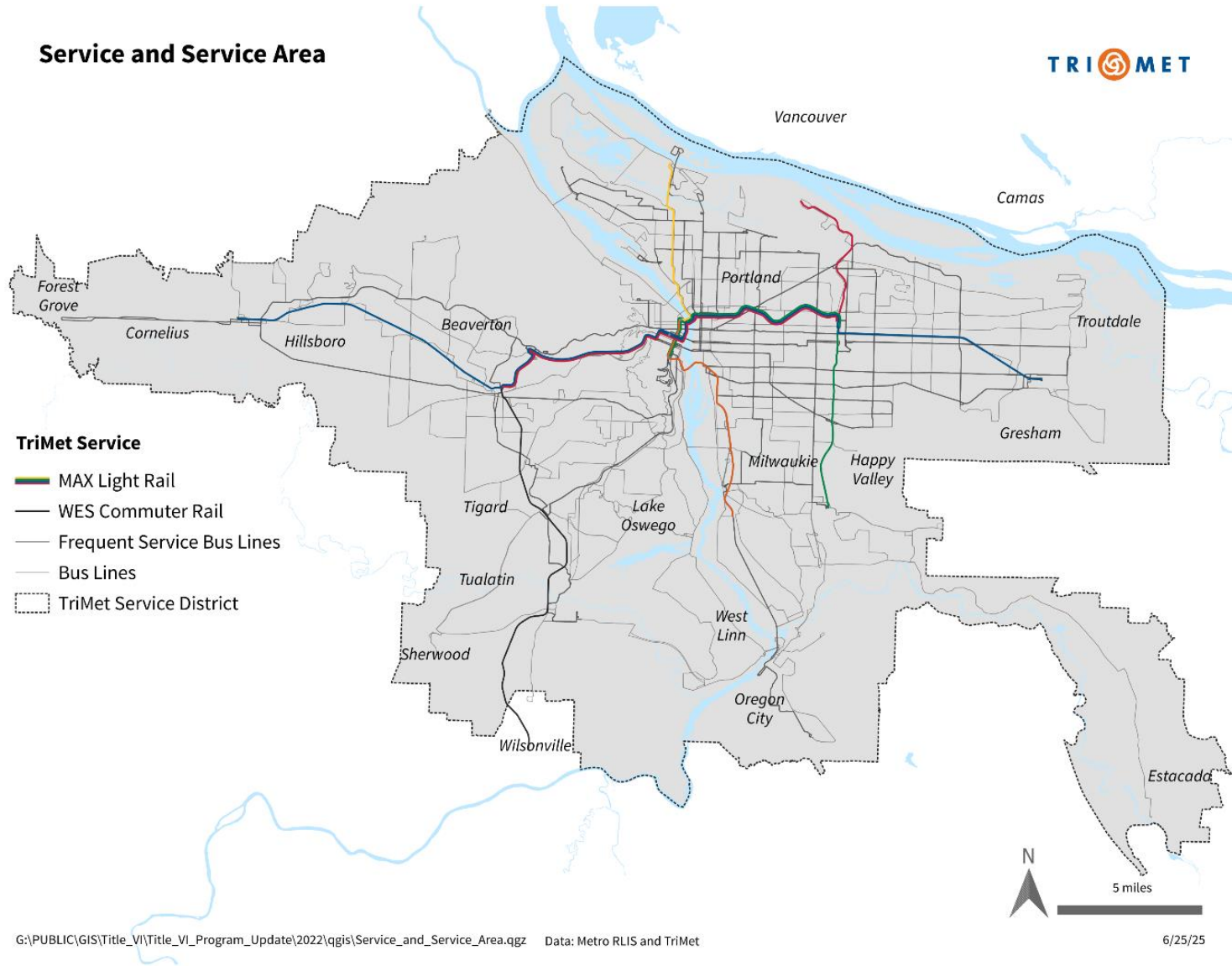


FIGURE 5-1: TriMet SERVICE AND SERVICE AREA

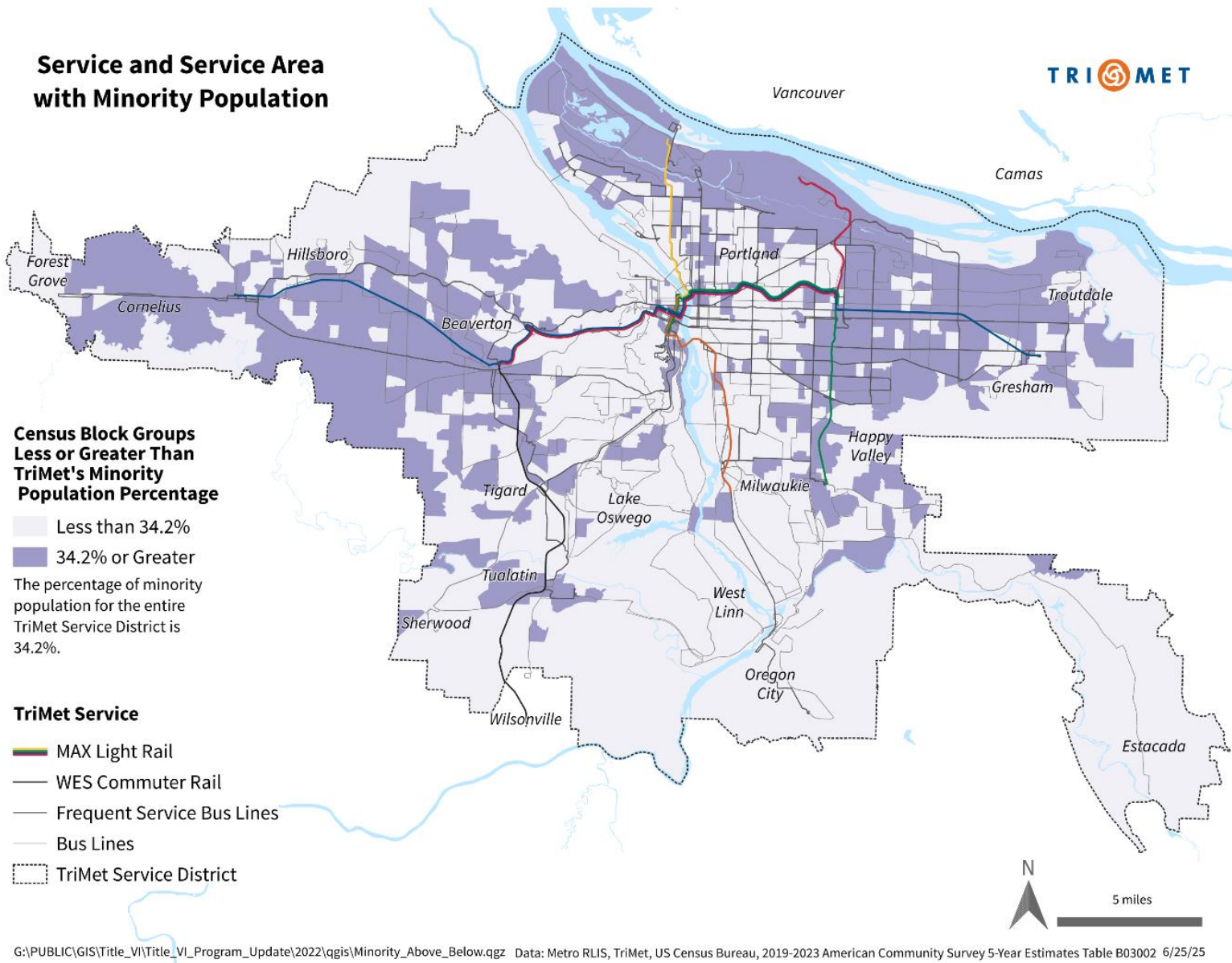
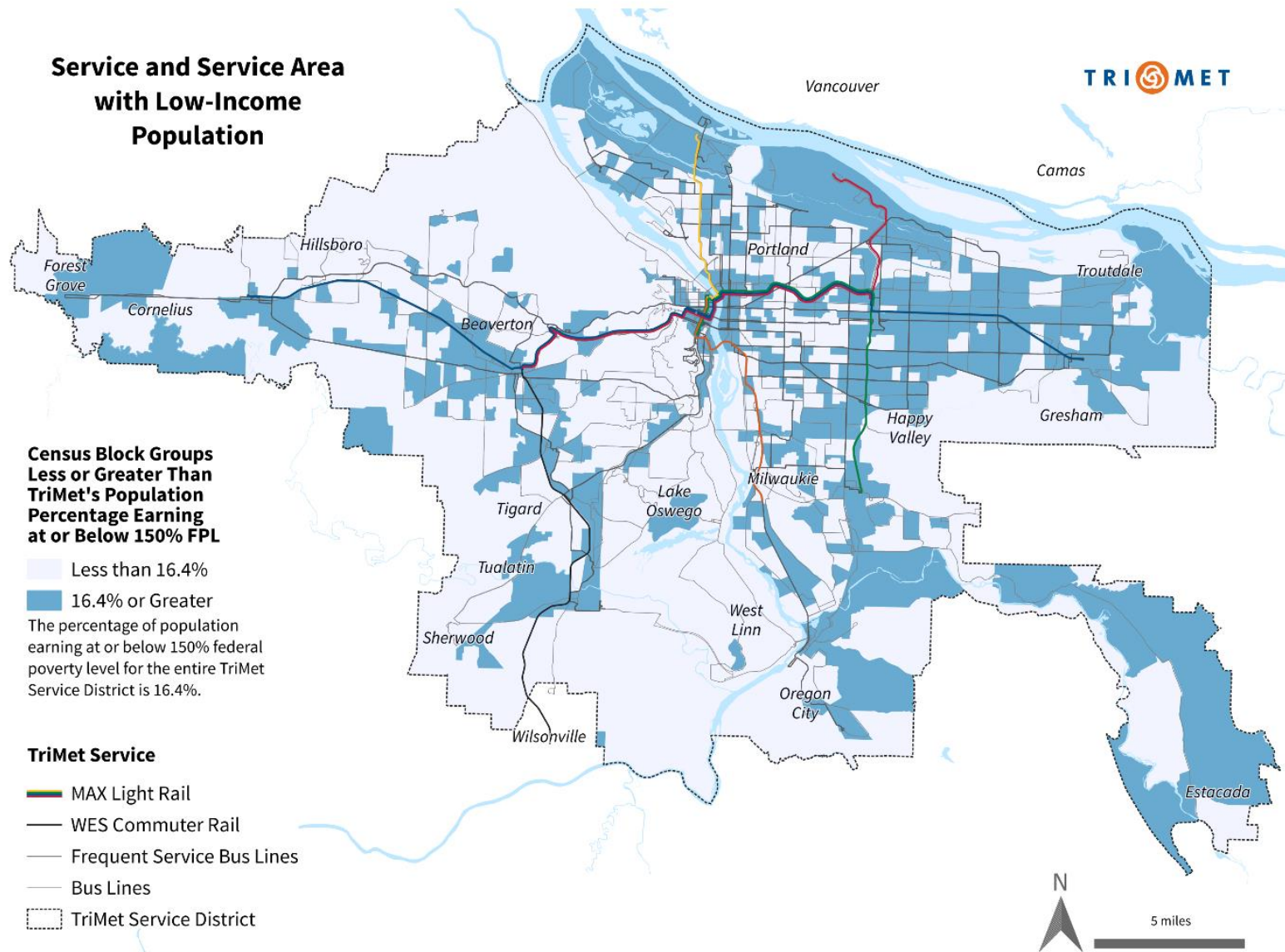


FIGURE 5-2: SERVICE AND SERVICE AREA WITH MINORITY POPULATION



G:\PUBLIC\GIS\Title_VI\Title_VI_Program_Update\2022\qgis\LowIncome_Above_Below.qgz Data: Metro RLIS, TriMet, US Census Bureau, 2019-2023 American Community Survey 5-Year Estimates Table C17002 6/25/25

FIGURE 5-3: SERVICE AND SERVICE AREA WITH LOW-INCOME POPULATION

Service and Service Area with Limited English Proficient Population

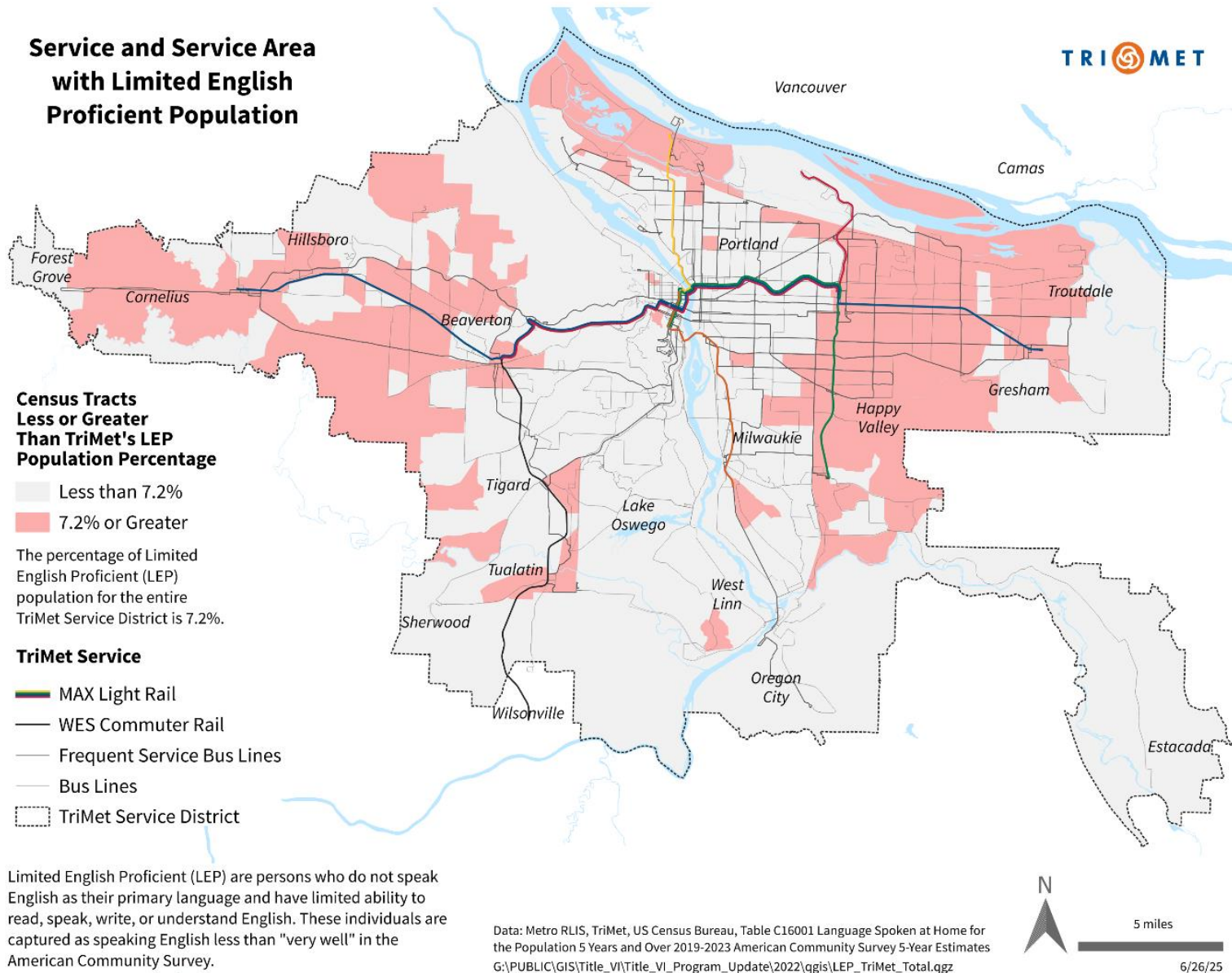


FIGURE 5-4: SERVICE AND SERVICE AREA WITH LIMITED ENGLISH PROFICIENT (LEP) POPULATION

Rider Characteristics and Demographics

TriMet regularly conducts public surveys to gather information on ridership patterns, fare payment and perceptions of TriMet. Surveys include optional demographic questions to inform outreach, analysis and service planning.

The analysis that follows uses results from TriMet's 2025 Attitudes and Awareness Survey, conducted from April 28–June 1, 2025. A total of 4,632 people completed the survey either online or by phone and in seven different languages (English, Spanish, Chinese, Russian, Vietnamese, Korean and Arabic). Survey participants included both riders and non-riders.

Vehicle Modes Used (Bus, MAX, WES)

The majority of survey respondents (overall and within each demographic group) indicated that they rely on TriMet bus and/or MAX as one of their top five transportation options. A small percentage use WES (2-4% across demographic groups). Similar shares of minority, non-minority and non-low-income riders reported riding bus and MAX, while low-income riders are more likely to ride the bus (78% of low-income respondents) than MAX (68% of low-income respondents). See Figure 5-5.

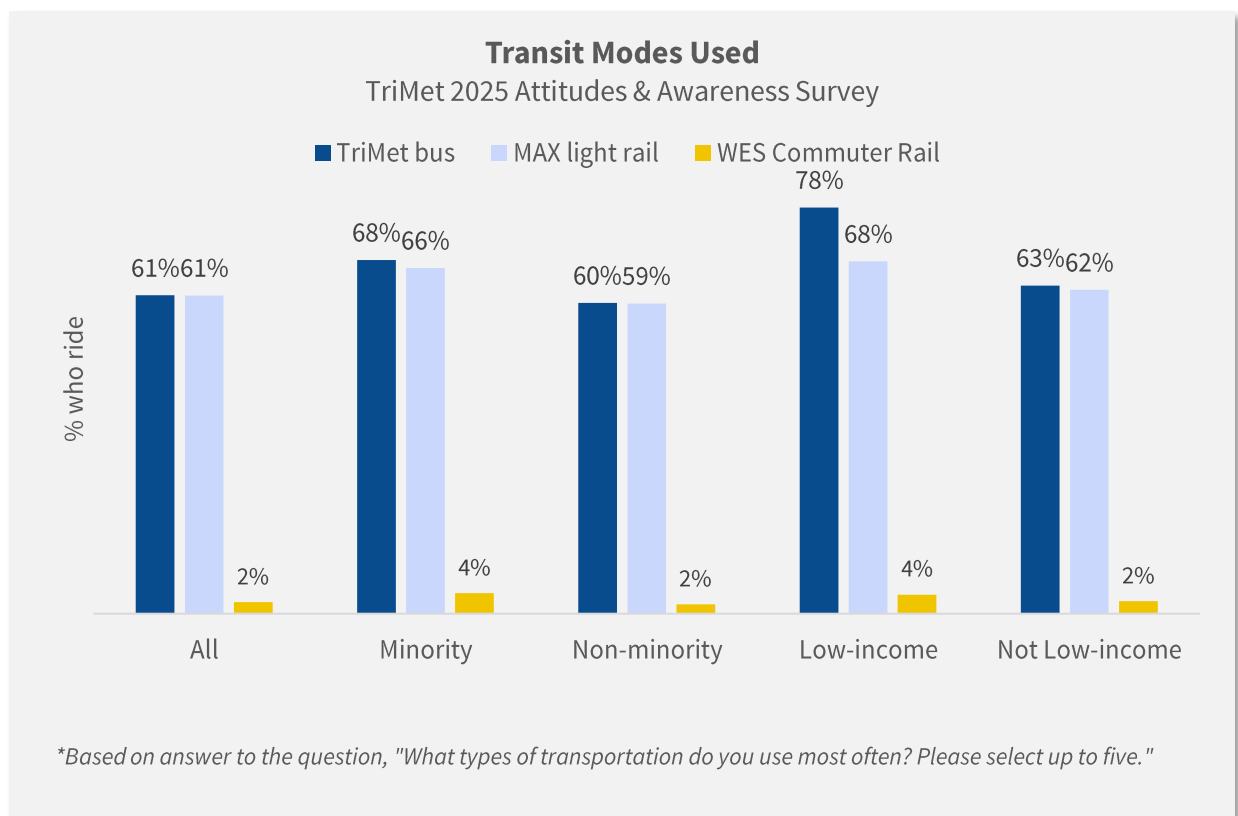


FIGURE 5-5: VEHICLE MODES BY DEMOGRAPHIC GROUP

Transfers

Most trips on TriMet do not involve a transfer. In other words, the majority of riders enjoyed a one-seat ride to complete their one-way trips. However, 53% of minority riders and 55% of low-income riders reported needing to transfer for half or more of their trips — higher than their non-minority and non-low-income counterparts (see Figure 5-6).

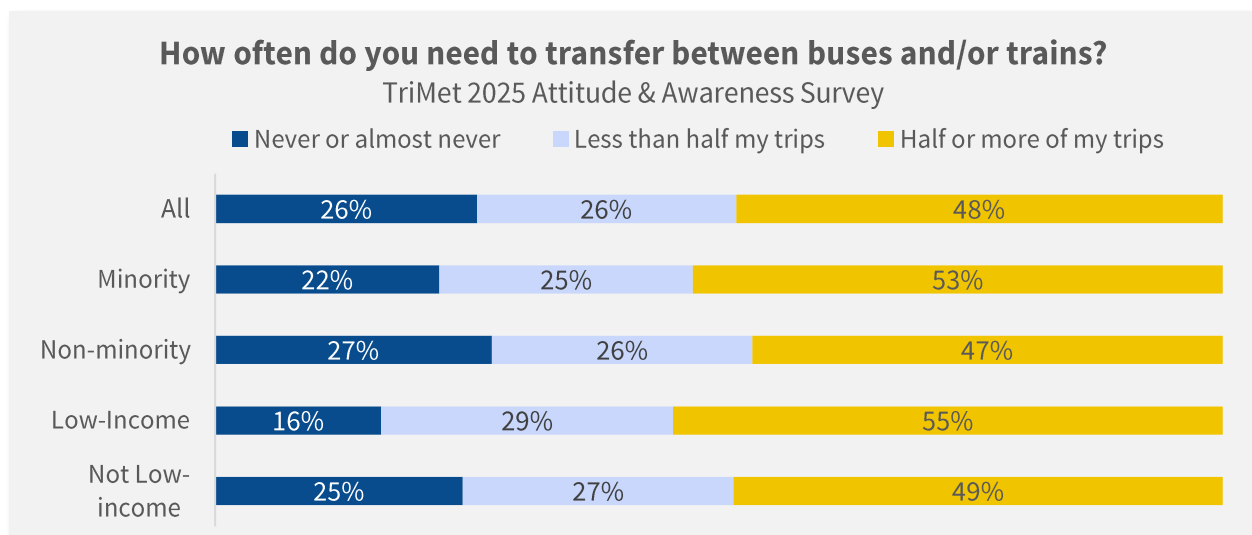


FIGURE 5-6: TRANSFER PATTERNS BY DEMOGRAPHIC GROUP

Frequency of Riding TriMet

The average number of times respondents rode TriMet in the last week was higher for trips made by minorities and low-income riders. As shown in Figure 5-7, 39% of minority and 47% of low-income riders reported riding regularly or frequently (several days a week or more) compared to 34% of non-minority and 37% of non-low-income riders.

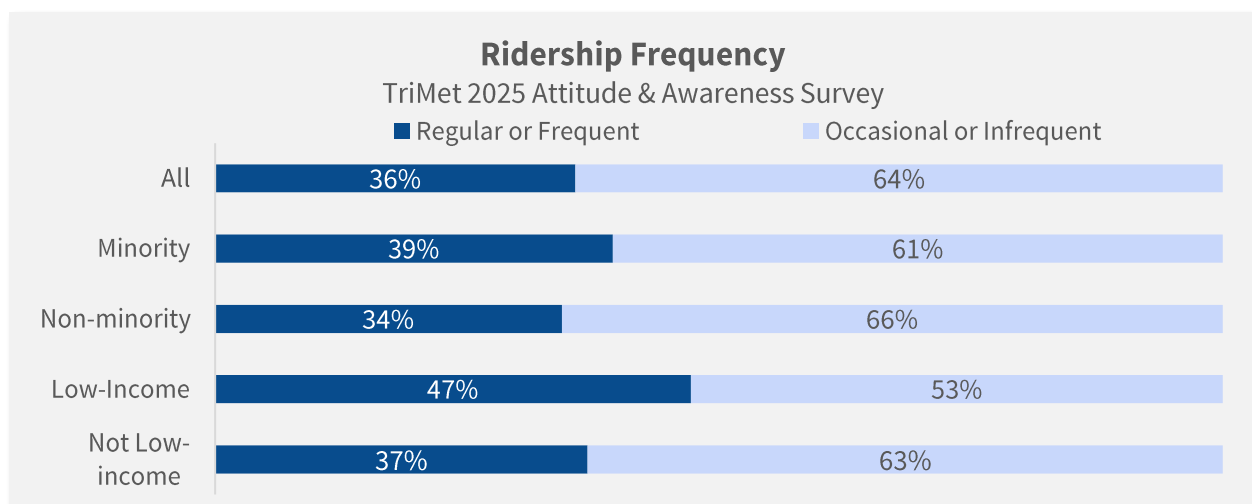


FIGURE 5-7: FREQUENCY OF RIDERSHIP BY DEMOGRAPHIC GROUP

Transit-Dependency

In order to explore transportation options available to TriMet riders, respondents were asked, “Would you consider yourself dependent on TriMet for the majority of your transportation needs?” As shown in Figure 5-8, minority and low-income riders are more likely to need TriMet to get around than non-minority and non-low-income riders.

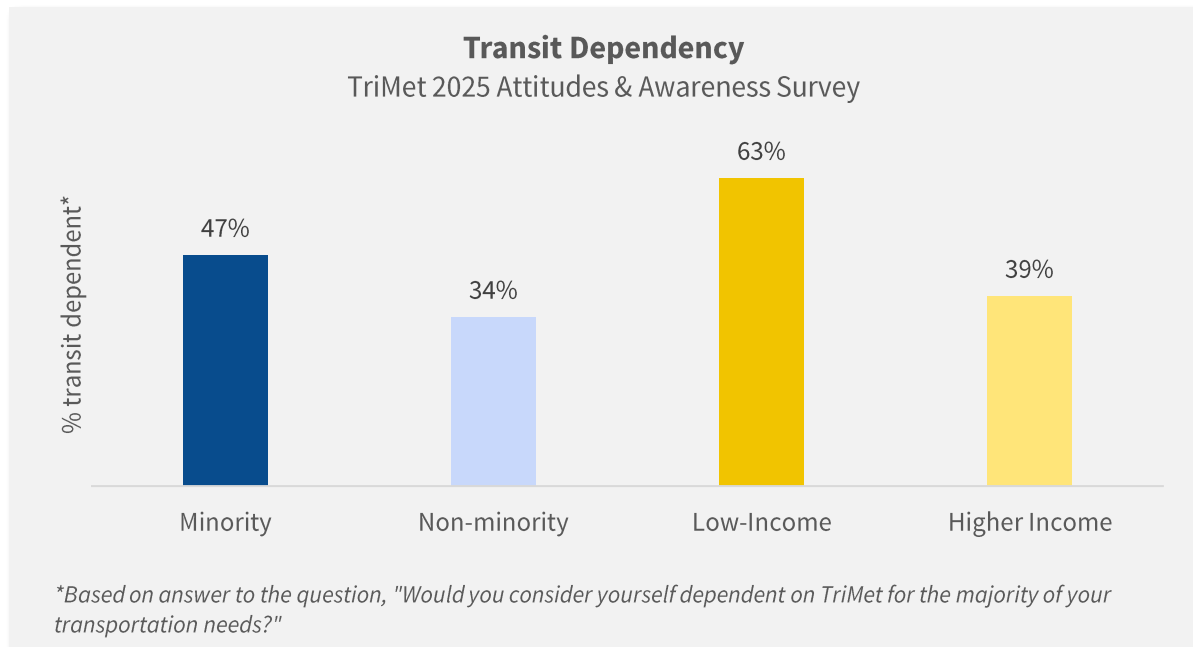


FIGURE 5-8: TRANSIT DEPENDENCY BY DEMOGRAPHIC GROUP

Fare Payment

The survey asked respondents about the fares they use and how they pay when they ride TriMet. Figures 5-9 and 5-10 reveal some differences between demographic groups:

1. Over one-third (35%) of non-minority riders pay the Honored Citizen fare, compared to 28% of minority riders.
2. The majority (55%) of low-income riders pay the Honored Citizen fare, compared to 33% of non-low-income riders.
3. Across all groups, most riders pay their fare using Hop Fastpass™ (either a plastic or virtual card). One notable difference between groups is the high percentage of low-income riders who use a plastic card (62% compared to 43-45% for other demographics).

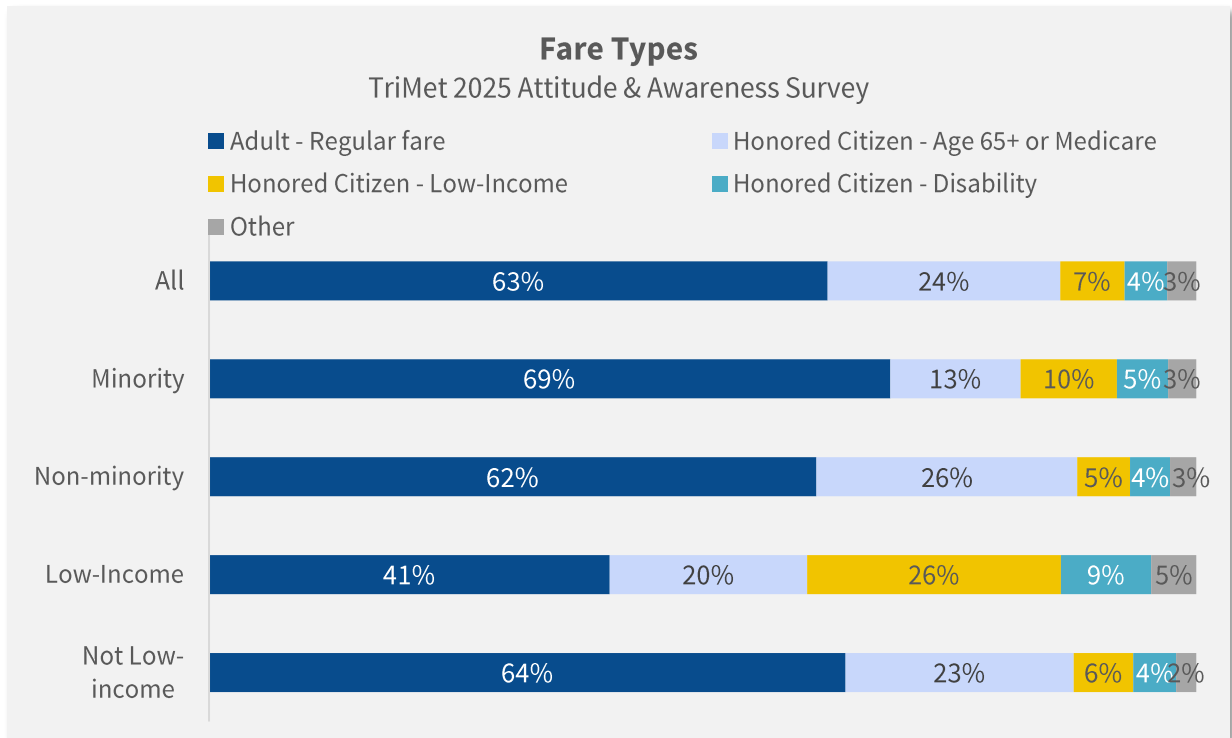


FIGURE 5-9: TYPES OF FARES USED BY DEMOGRAPHIC GROUP

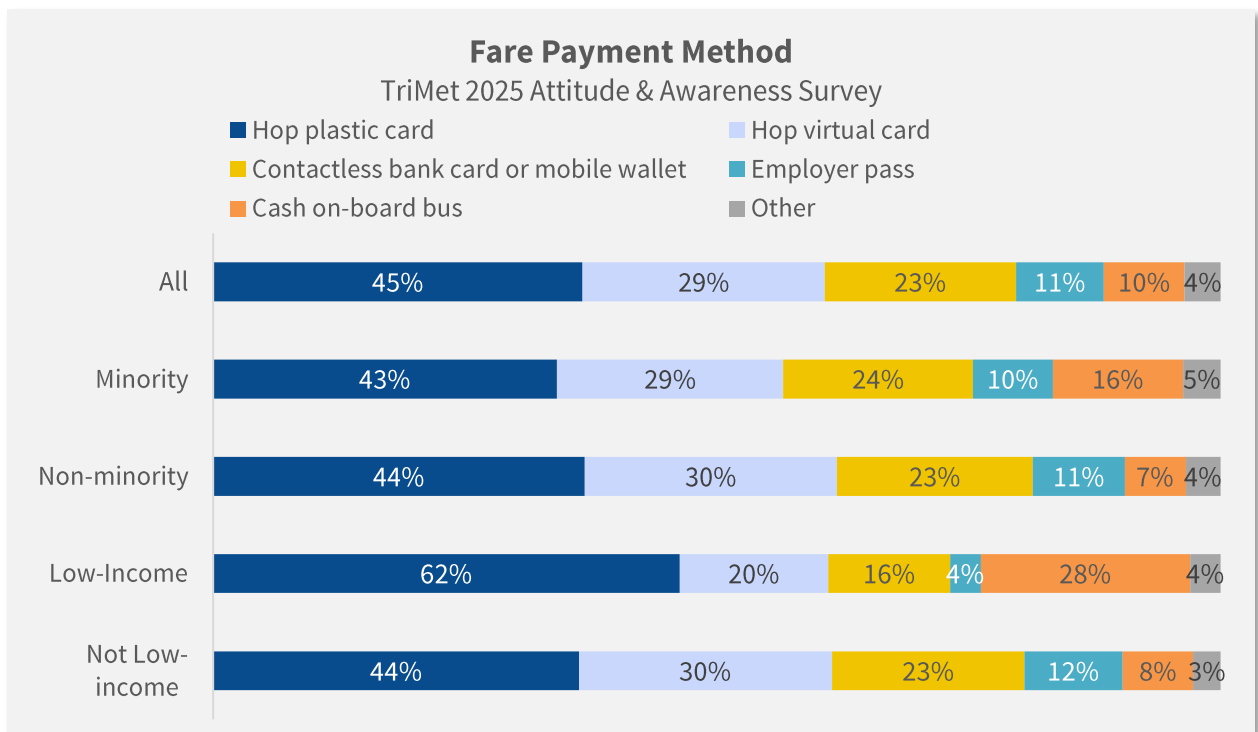


FIGURE 5-10: FARE PAYMENT PATTERNS BY DEMOGRAPHIC GROUP

Facilities

Three maps (Figures 5-11, through 5-13) are provided to illustrate determination of Title VI program compliance with respect to recent, in progress and planned major transit facility improvements.

These respective figures highlight transit facilities that:

1. Were recently replaced, improved, or;
2. Have improvements that are in progress, or;
3. Where improvements are scheduled (planned projects and projects identified in planning documents for an update in the next five years).

Figures 5-14 through 5-16 show Recent, In Progress and Planned Facilities organized by facility type and **do not reveal any apparent disparities in terms of proximity to these facilities.**

Recently Completed

- One storage and maintenance facility improvement
- Five transit center improvements
- Two park & ride improvements
- Three elevator refurbishments
- 45 major bus stop improvements
- Three light-rail corridor improvements
- One light-rail station improvement
- 369 digital display additions
- Six light rail crossing improvements
- 57 ADA text-to-speech devices installed
- 28 blue-light security phones installed at MAX stations

In Progress and Planned

- Two new high-capacity bus corridors
- Two new transit center improvements
- 12 light rail crossing improvements
- Seven elevator refurbishments
- 18 major bus stop improvements

- One light-rail station improvement
- 110 digital display additions
- 50 ADA text-to-speech devices
- 50 blue-light security phones

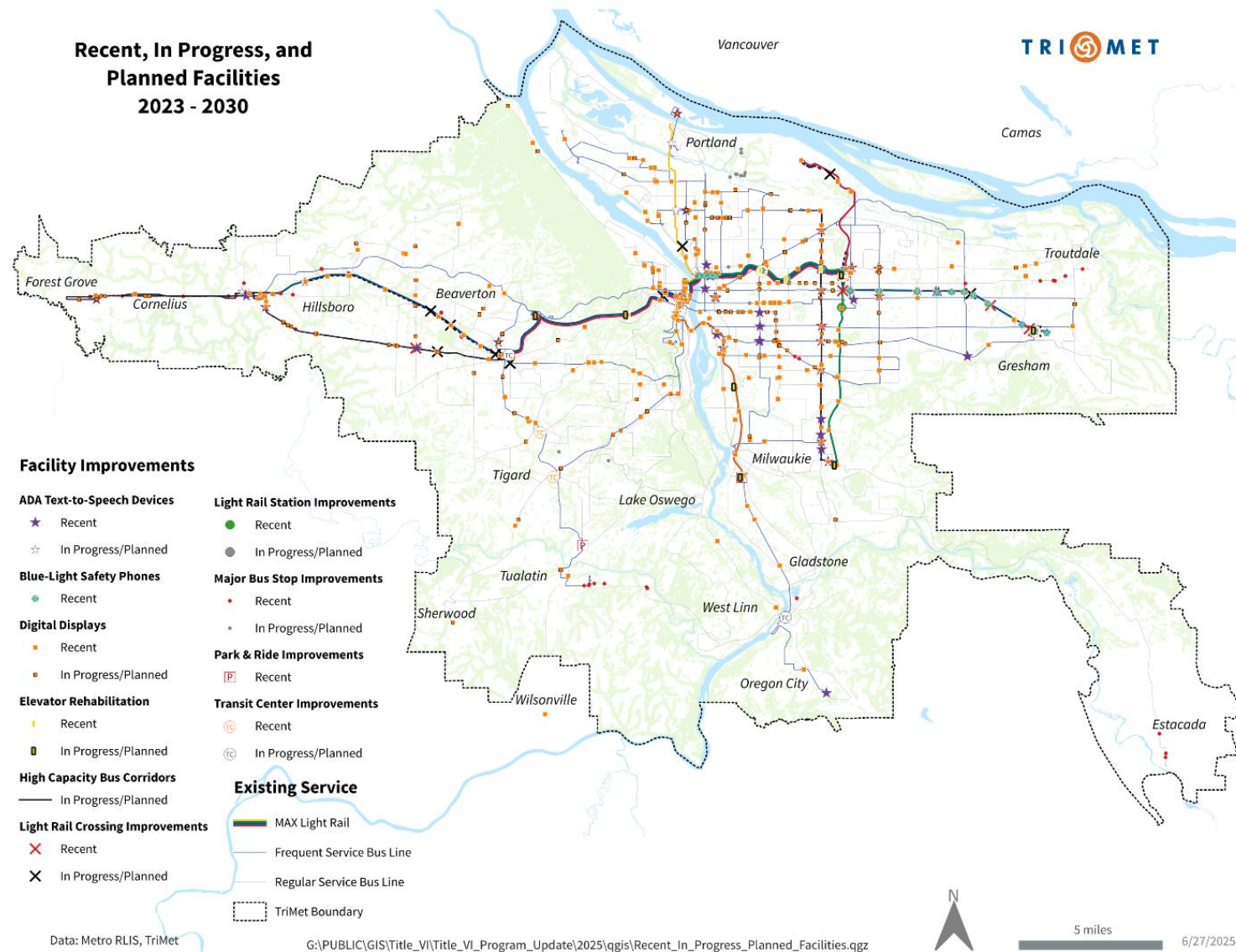


FIGURE 5-11: RECENT, IN PROGRESS AND PLANNED FACILITY IMPROVEMENTS

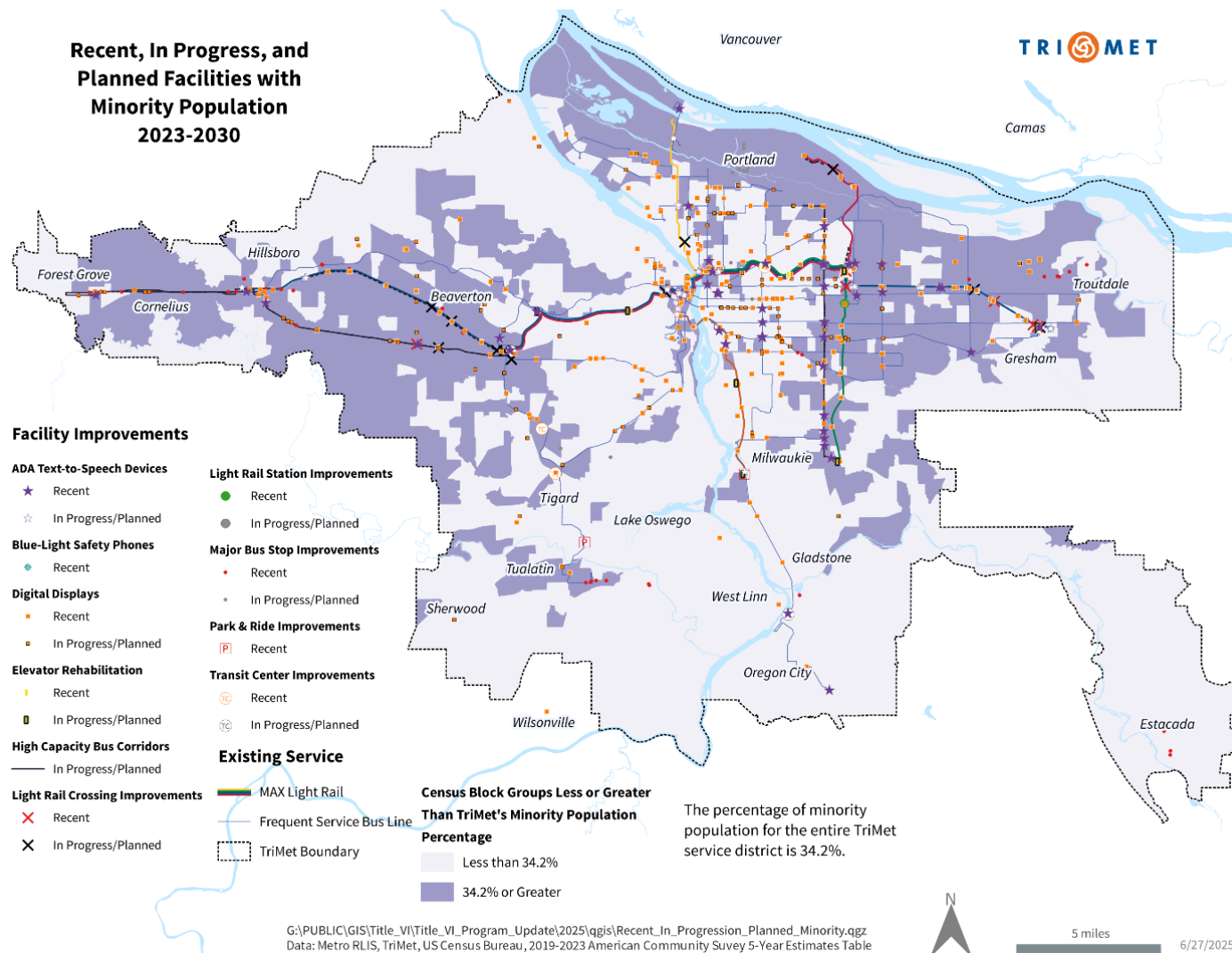


FIGURE 5-12: RECENT, IN PROGRESS AND PLANNED FACILITIES WITH MINORITY POPULATION

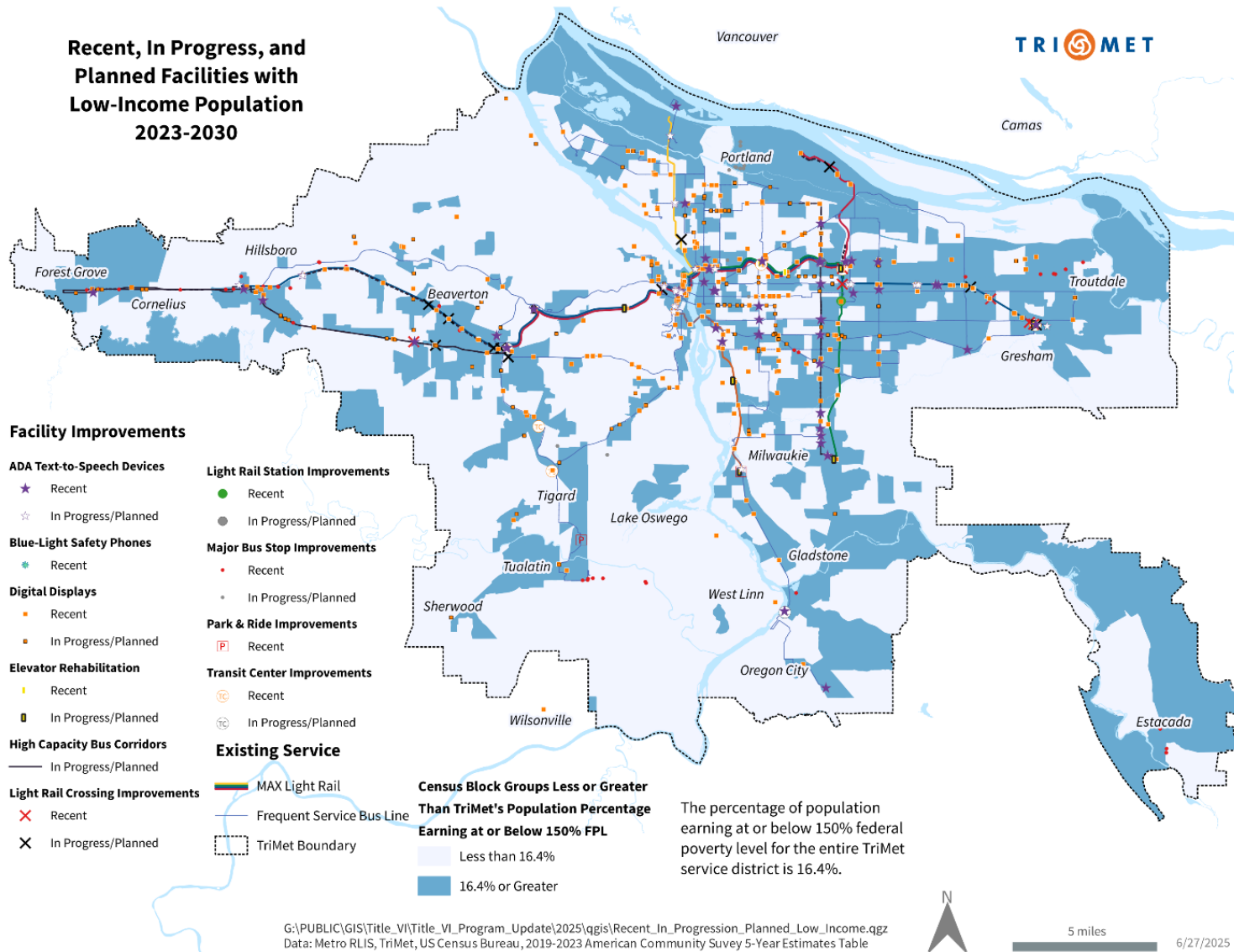


FIGURE 5-13: RECENT, IN PROGRESS AND PLANNED FACILITIES WITH LOW-INCOME POPULATION

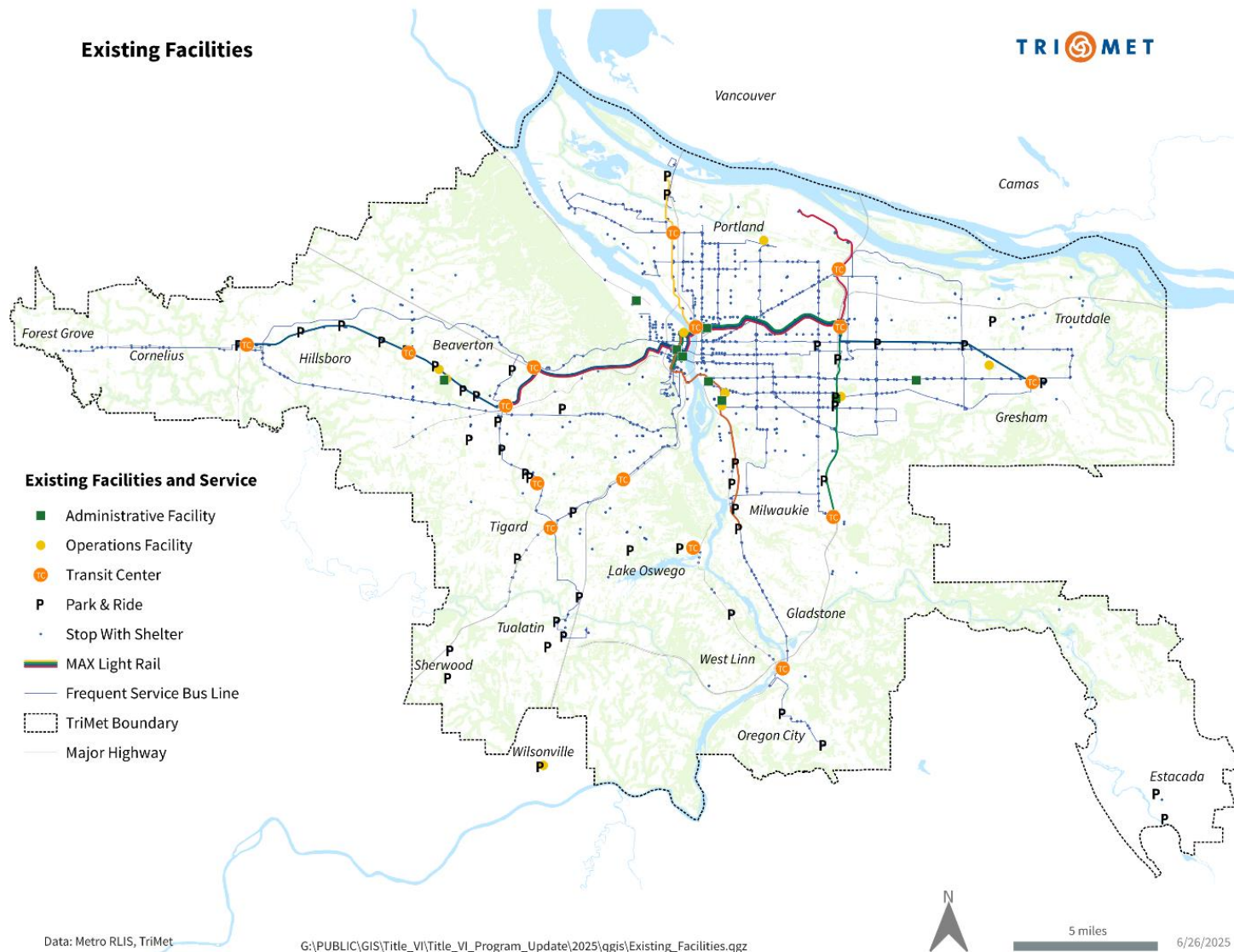


FIGURE 5-14: EXISTING FACILITIES

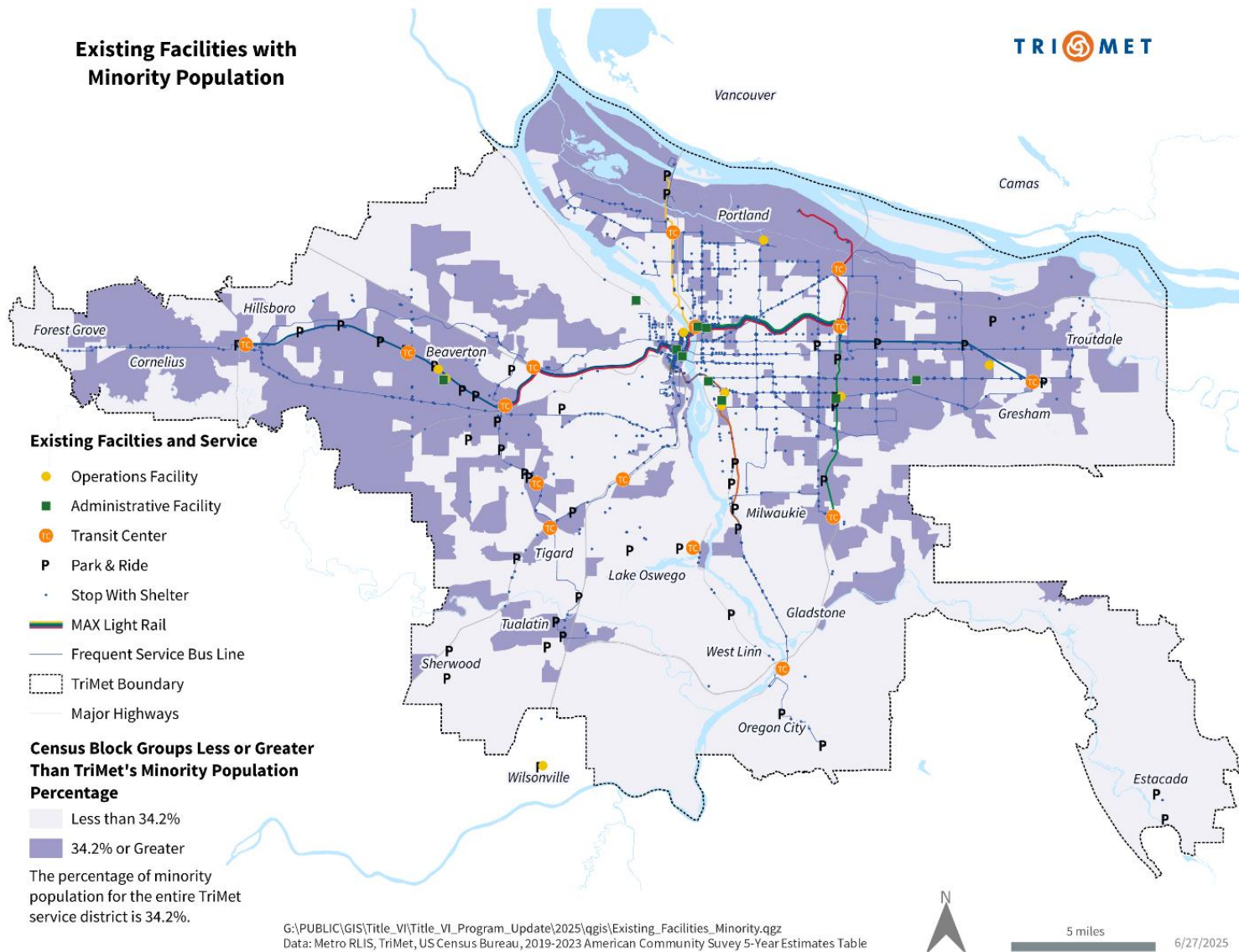


FIGURE 5-15: EXISTING FACILITIES WITH MINORITY POPULATION

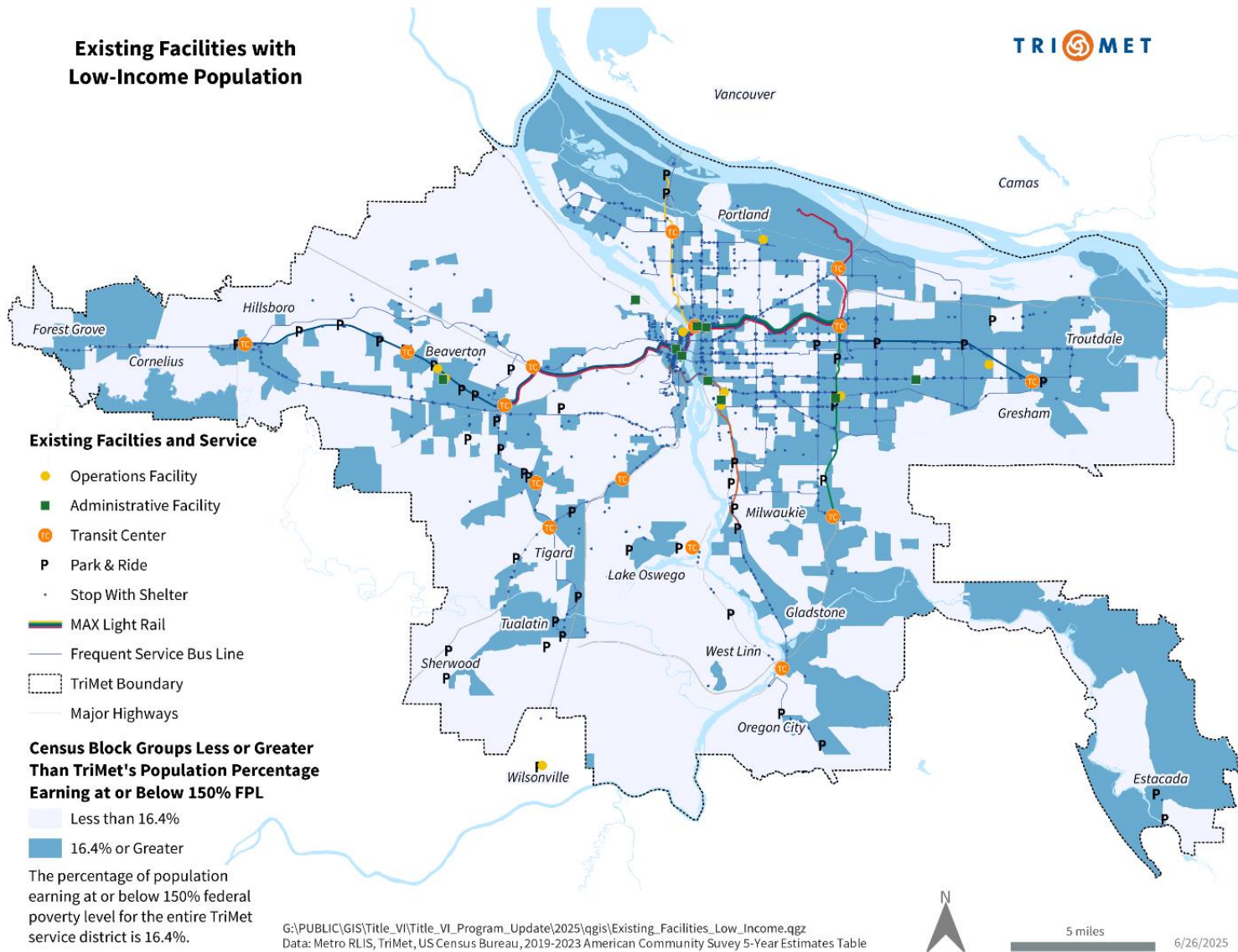


FIGURE 5-16: EXISTING FACILITIES WITH LOW-INCOME POPULATION

Attachments

A: (Reserved) TriMet Board Resolution 25-09-47 Approving TriMet's Updated 2025 Title VI Program

B: Title VI Complaint Form

C: Title VI Vehicle Notice

D: Title VI Administrative Office Notice

E: Draft FY2026 Community Affairs & Engagement Plan

F: Language Access Plan

G: Subrecipient Title VI Guide

H: Title VI Analyses Completed Since 2022 Submittal

Attachment A: (Reserved) TriMet Board Resolution 25-09-41 Approving TriMet's Updated 2025 Title VI Program

Attachment B: Title VI Complaint Form

Instructions

TriMet welcomes all riders to use its service no matter their identity or where they come from. TriMet is dedicated to giving everyone equal access to their facilities and services according to state and federal law.

The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternative formats, please let us know using the contact information on the next page.

If you require assistance completing this form or submitting a complaint, please contact TriMet Customer Service at 503.238.7433. You can also chat with a customer service representative by going to trimet.org/contact

Section I – Your Information

Name:	Pronouns (optional):	Phone Number:
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Street Address:			
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City:	State:	ZIP:	Email:
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Section II – Aggrieved Party Information (complete ONLY if you are filing this complaint on behalf of someone else)

Have you obtained permission from the aggrieved party to file this complaint on their behalf? ☐ Yes ☐ No

Name of the Aggrieved Party:	Pronouns (optional):	Relationship to you:
------------------------------	----------------------	----------------------

Please explain why you are filing this complaint for a third party:

Section III – Complaint Details

I believe the discrimination I/the aggrieved party experienced was based on (check all that apply):

☐ Race ☐ Color ☐ National Origin ☐ Sex ☐ Religion ☐ Sexual Orientation ☐ Marital Status ☐ Age ☐ Disability ☐ Gender

Date of Occurrence:	Approximate Time of Occurrence:
---------------------	---------------------------------

Location of Occurrence (City and County):

In your own words, describe the alleged discrimination. Explain what happened and what policy, program, activity or person you believe was discriminatory (if you need additional space please use page 3 of this form):

Section IV – Witnesses

Are there any persons who witnessed the alleged discrimination? ☐ Yes ☐ No

If Yes, and they would like to provide a statement, please provide their name and contact information:

Name: _____ Phone Number: _____

Address: _____

City: _____ State: _____ ZIP: _____

Email: _____

Section V – Previous filing(s)

Have you filed this complaint with any other federal, state, or local agency or court? ☐ Yes ☐ No

If Yes, check each box that applies:

☐ Federal Agency ☐ Local Agency ☐ State Agency ☐ Federal Court ☐ State Court ☐ Other: _____

Please provide contact information for a person at the agency/court where the complaint was filed:

Name: _____ Phone Number: _____

Email: _____

Section VI – Signature(s)

Signature of Complainant:

Date:

Signature of Preparer:

Date:

(Official Use Only)

PAI TEAM :

Complaint received: _____ / _____ / _____ Verified by: _____

Title VI: YES/NO

(date)

Other Category: YES/NO

(date)

You may submit this form via email, mail, or fax.

Mail:

TriMet
Public Access & Innovation Division
101 SW Main St. Ste 700
Portland, Oregon 97204

Email:

civilrightscomplaints@trimet.org

Subject:

[Your Name] / Complaint Form

Fax:

503-962-3453

Additional Space for information about regarding the alleged discrimination:

Attachment C: Title VI Vehicle Notice

TriMet Respects Civil Rights

TriMet operates its programs without regard to race, color, national origin, religion, sex, sexual orientation, marital status, age or disability in accordance with applicable laws, including Title VI of the Civil Rights Act of 1964 and ORS Chapter 659A. To request additional information on TriMet's Title VI nondiscrimination requirements, or if any person believes they have been aggrieved by an unlawful discriminatory practice under Title VI or other applicable law and would like to file a complaint, contact us at 503-238-7433 (TTY 503-238-5811) or email administration@trimet.org.

TriMet tiến hành hoạt động các ban ngành của mình không phân biệt chủng tộc, màu da, nguồn gốc, tôn giáo, giới tính, khuynh hướng tình dục, tình trạng hôn nhân, tuổi tác hoặc khuyết tật sao cho phù hợp với pháp luật hiện hành, bao gồm Điều Khoản Thứ VI của Đạo Luật Dân Quyền Năm 1964 (Title VI of the Civil Rights Act of 1964) và Đạo Luật ORS Chapter 659A. Nếu quý vị cần thêm thông tin về các yêu cầu chống kỳ thị của TriMet dựa trên Điều Khoản Thứ VI, hoặc bất cứ ai cho rằng họ đã bị phiền toái vì những thủ tục kì thị bất hợp pháp như đã nêu trong Điều Khoản Thứ VI hoặc các điều luật khác của pháp luật hiện hành và muốn nộp đơn khiếu nại, xin liên lạc với chúng tôi tại số 503-238-7433 (số cho người khuyết tật 503-238-5811) hoặc gửi điện thư cho chúng tôi tại administration@trimet.org.

TriMet(트라이메트)의 모든 프로그램은 1964년 제정된 민권법 VI 편 및 ORS 659A를 포함한 관계 법령에 따라 인종, 피부색깔, 출신국, 종교, 성별, 성적성향, 혼인여부, 나이 또는 장애여부에 따른 차별없이 운영됩니다. TriMet (트라이메트)에서의 VI편 관련 차별 금지 규정에 관한 보다 자세한 자료가 필요하거나, VI편이나 기타 해당 법령에 따른 불법적 차별을 당하여 이의를 제기하고자 하는 분은 전화 503-238-7433 (TTY 503-238-5811)번 또는 전자우편 주소 administration@trimet.org 로 연락하여 주시기 바랍니다.

TriMet opera sus programas sin considerar raza, color, origen nacional, religión, sexo, orientación sexual, estado civil, edad o discapacidad de acuerdo con las leyes pertinentes incluyendo el Título VI del Acta de los Derechos Civiles de 1964, y ORS Capítulo 659A. Para más información sobre los requisitos no discriminatorios de TriMet bajo el Título VI, o si alguna persona piensa que fue agraviada por una práctica discriminatoria bajo el Título VI, y quiere presentar una queja contáctenos al 503-238-7433 (TTY 503-238-5811) o envíe un correo electrónico a administration@trimet.org.

Компания «TriMet» осуществляет свою деятельность без дискриминации по расовой принадлежности, цвету кожи, национальному происхождению, религии, полу, сексуальной ориентации, семейному статусу, возрасту, наличию инвалидности в соответствии со всеми применимыми законами, включая часть VI Акта о гражданских правах 1964 года и Главу 659A пересмотренных законов Орегона. Чтобы получить дополнительную информацию о недискриминации, или если кто-либо желает подать жалобу о незаконной дискриминации в соответствии с частью VI или любым другим применимым законом, пожалуйста, свяжитесь с нами по телефону 503-238-7433 (для слабослышащих – 503-238-5811) или напишите эл. письмо на адрес administration@trimet.org.

TriMet項目的運作按照適用法律不考慮種族、膚色、國籍、宗教、性別、性取向、婚姻狀況、年齡或殘疾狀況，其中包括1964年民權法案第VI章和ORS第659A章的規定。欲索取更多有關TriMet第VI章非歧視規定，或如果有任何人已經因為被非法歧視而感到屈辱而希望進行投訴，同時其符合第VI章或其它適用的法律，請聯系我們503-238-7433 (聽力障礙 503-238-5811) 或發電子郵件至administration@trimet.org。

Attachment D: Title VI Administrative Office Notice

TriMet Respects Civil Rights

TriMet operates its programs without regard to race, color, national origin, religion, sex, gender identity, sexual orientation, marital status, age or disability in accordance with applicable laws, including Title VI of the Civil Rights Act of 1964, ORS Chapter 659A.403 and the Americans with Disabilities Act of 1990.

Civil Rights and Public Accommodations is **THE LAW**

TriMet's policy is to fully comply with federal and state laws designed to ensure protected groups who are entitled to enjoy the services of a public accommodation may do so on an equal basis and without discrimination. TriMet's policy is to provide programs and services in which all customers are able to utilize our transit system in a safe and respectful environment, free from discrimination, unfair treatment, or inappropriate conduct by TriMet employees, independent contractors, or other individuals.

Employees are expected to treat our customers respectfully
and act professionally in all locations where
TriMet work is performed.

TriMet Human Resources Manual Policy 6.14 Civil Rights and Public Accommodations



Attachment E: Draft FY2026 Community Affairs & Engagement Plan



Community Affairs & Engagement Plan FY26



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1 Community Affairs & Engagement – connecting with people

Collaborating closely with other departments in Public Affairs, the Community Affairs & Engagement team is focused on **connecting with the people we serve** for timely, transparent two-way communication.

The team establishes and nurtures relationships that advance TriMet's 2030 Strategic Plan, with a focus on two key goals and strategies:

- **Elevate the customer experience:** identify and reduce barriers to ridership
- **Advance TriMet's value to the region:** proactively engage and collaborate with regional partners

2 Community Affairs: capital projects

The Community Affairs team supports capital projects, serving as a liaison between our design teams, construction crews and the communities where transit infrastructure is being built or repaired. These connections are essential for project success:

- **Builds community ownership.** The team synthesizes and mediates diverse perspectives to advance project goals and incorporate community needs into project design and delivery.
- **Keeps projects on schedule and on budget.** The team anticipates and resolve potential conflicts that could slow projects down, add scope or create significant controversy.
- **Fulfills outreach requirements,** including those of partners and permitting processes.

3 Community Engagement: service, policy, programs

The Community Engagement team leads outreach for service, policy and programs, providing meaningful access to information and civic participation with a focus on vulnerable populations and historically underrepresented communities. These connections are essential for agency success:

- **Allows TriMet to understand and respond to riders' needs.** The multilingual, multicultural team meets people where they are, sharing information and gathering feedback at a human scale, learning about community needs beyond quantitative surveys and ridership counts.

- **Increases transparency, trust and positive perception.** Through meetings, events and one-on-one relationships, the team's presence in the community generates goodwill and trust.
- **Fulfills outreach requirements,** including Title VI.

4 Outreach goals and framework

TriMet recognizes that diverse values and opinions held both individually and as a group contribute to the quality of community life throughout the region. TriMet is committed to engaging with the communities it serves to provide meaningful inputs to decision-making processes.

Public participation spectrum

Before embarking on any outreach effort, it is important to be clear about its intended goals. Which project or program elements would benefit from community input? How and when will the information we gather from the public influence TriMet's decisions?

Most TriMet outreach falls within the **inform/consult/involve** categories of the internationally-recognized public participation spectrum, often including multiple elements and phases that cross more than one of these areas.

INCREASING IMPACT ON THE DECISION					
	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

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Outreach plan elements

With the spectrum in mind, outreach efforts begin with a plan that includes:

1. **Purpose and position on public participation spectrum**
2. **Clear messages**
 - a. Information that results in full, accurate public understanding of options and issues
 - b. How feedback will be used
 - c. Reflection of brand
3. **Identification of potentially-affected public**, with a special effort toward reaching low income and minority populations, and identification of possible barriers to participation.
4. **Identification of language needs** to ensure participation by people with Limited English Proficiency (LEP). This includes using Four Factor analysis per TriMet's Title VI Program Update.
5. **Outreach methods**
6. **Processes for analyzing and sharing feedback received**
7. **Timeline and staff accountabilities**
8. **Documentation and evaluation process**

5 Methods

The following table provides examples of outreach methods. The Community Affairs & Engagement program participates in all methods, with a focus on nurturing **personal relationships**. These relationships bring community expertise and lived experience into agency decision-making, addressing community needs and fostering a sense of ownership.

	Level of engagement		
	Inform	Consult	Involve
Method	Mailings		
	Email lists		
	Newsletters		
	Handouts		
	Web pages		
	Social media		
	Traditional media		
	Advertisements		
	On-site signage		
	24/7 emergency hotline		
	Conduct of Construction		
	Tabling at community events		
	Canvassing		
	Host open houses – online and in person		
	Participate in meetings of established groups (neighborhoods, businesses, CBOs)		
	Interviews		
	Focus groups		
	Advisory committees		
	Engage public participation partners (on-call contract) to broaden reach of all methods		
	Personal relationships		

6 Staff responsibilities

Community Affairs and Engagement staff connect with the people we serve to provide **timely, transparent two-way communication**:

- Know the community: maintain personal relationships with key stakeholders and a strong understanding of neighborhood, local and regional politics
- Advise and problem-solve with relevant staff on community interests and concerns, barriers encountered by marginalized populations and opportunities to grow ridership and improve project outcomes
- Serve as a first point of contact: coordinate and document interactions with external stakeholders
- Serve as a liaison with other Public Affairs teams for specific projects and outreach efforts (Communications, Marketing & Business Development, Government Affairs, Customer Experience)
- Insulate technical staff from complaints, conflict and emotionally charged situations

7 Community Affairs role: leading outreach for capital projects

Community Affairs staff are embedded with technical teams in the division of Engineering & Construction, and the departments of Service Planning and Transit Oriented Development, Safety and others. They participate in technical meetings and maintain a working understanding of project schedules, technical drawings, right-of-way acquisition processes and permitting requirements. This spans all project phases:

- **Planning.** During the planning phase of a project (with larger projects typically led by Metro), Community Affairs staff supports agency partners in community engagement strategies that facilitate a project's smooth transition to TriMet for eventual design, construction and operation. This early engagement helps establish trust with key stakeholders and a strong understanding of the values guiding the project.
- **Design.** During the design phase of a project, Community Affairs staff build personal relationships with project stakeholders, municipal partners and organizations to help weave community values into the technical fabric of transit projects. This helps ensure that projects are meeting community needs and creates a sense of community ownership.
- **Construction.** During construction, Community Affairs staff draw on established relationships to help minimize impacts for businesses and residents by advising construction managers about the unique needs at each site. Community Affairs staff keep stakeholders informed about what to expect during construction, and they collaborate with project staff to resolve the conflicts that inevitably arise.

8 Community Engagement role: leading outreach for programs, policies and services

The Community Engagement team coordinates agency outreach for TriMet programs, policies and services. This includes service changes, fare changes, new programs and initiatives. The team's activities include:

- **Hosting TriMet meetings and events.** This includes open houses to collect feedback from the general public on specific proposals. The team also supports multiple standing advisory committees, including oversight of a stipend program for qualifying members, in an effort to reduce barriers to participation.
- **Nurturing relationships with community-based organizations.** The team maintains regular contact with neighborhood associations, service providers and other organizations that advocate for shared priorities.
- **Public participation partnerships.** The team manages an on-call contract for outreach services with community based organizations and public outreach practitioners. These partnerships deepen TriMet's presence in key communities, particularly those with limited

English proficiency and low incomes, providing culturally-relevant recruitment and incentives for participation in TriMet events.

- Tabling at community events. The team staffs community events with opportunities for meaningful conversation with populations TriMet seeks to engage.

9 FY26 priorities

The following topics are the primary areas of focus for Community Affairs & Engagement in FY26.

Community Affairs areas of focus

Projects in planning/design: lead outreach to educate and gather feedback

- 82nd Ave Transit Project
- TV Hwy Transit Project
- Interstate Bridge Replacement Program
- Better Bus program

State of Good Repair projects: lead outreach to inform neighbors and troubleshoot construction

- Transit Center upgrades: Oregon City, Beaverton
- Blue Line Station Rehabilitation (BLSR)
- Elevator access control
- Rail crossing improvements
- Traction Power Substation (TPSS) replacements
- Transit Oriented Development and station-area planning

Bus stops: inform riders and neighbors about proposed changes; research and resolve complaints

Community Engagement areas of focus

Gather community input on proposed service cuts. Efforts to balance TriMet's budget by 2028 will be a primary topic in most community conversations over the next few years, with service cuts that could affect all riders.

Expand awareness of TriMet service in multiple languages (how to ride, fare programs, language access, safety and security)

Support and guidance for advisory committees:

- Public Art Advisory Committee
- Crash Advisory Committee
- STIF Advisory Committee and STFAC Advisory Committee (including potential restructuring)
- Committee on Accessible Transportation
- 82nd Avenue Transit Project Community Advisory Committee

- TV Highway Transit & Safety Project Community Advisory Committee (including recruitment and onboarding)

Convene Transit Community Advocacy Roundtable: periodic convening of community leaders to champion transit through collaboration and training and tools for advocacy

Attachment F: Language Access Plan

Language Access Plan



Ensuring meaningful
access to TriMet programs
and services for all.

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Message from General Manager, Sam Desue Jr.

Every day, thousands of people across our region rely on TriMet to get where they need to go, whether to work, school, medical appointments, or to connect with family. Many of our riders bring the strength of speaking multiple languages, and it is our responsibility to ensure that everyone can easily access and understand critical transit information.

While compliance with federal Title VI Civil Rights requirements is essential. This work also strengthens the safety, reliability, and accessibility of our transit system for all riders. Our updated Language Access Plan shows how TriMet is meeting federal requirements, such as Title VI of the Civil Rights Act, its implementing regulations and guidance from the Federal Transit Administration, while also improving our ability to provide clear, timely, and meaningful information in the many languages spoken across our service area.

By removing language barriers, TriMet is not only meeting legal standards, but also enhancing safety, building trust, and improving the everyday journey for everyone who uses our services.

I am proud of the work behind this plan and excited for what comes next as we continue to provide public transit service that is welcoming for all.

A handwritten signature in black ink, appearing to read "Sam Desue Jr.".

Sam Desue Jr.

General Manager, TriMet

Introduction

TriMet is committed to ensuring that all individuals, regardless of their language, can access and benefit from our services. In compliance with Title VI of the Civil Rights Act of 1964 and the U.S. Department of Transportation’s guidance on providing meaningful access for individuals with Limited English Proficiency (LEP), we are proud to share our 2025 Language Access Plan.

This Language Access Plan reflects a human-centered approach to public service. This plan is, by design, centered in care for the multilingual communities we serve. By prioritizing clear communication and respect, we are working to reduce language barriers that can prevent individuals from fully using and benefiting from public transit. We are committed to creating a system that welcomes all riders.

While this plan focuses on language access for individuals with limited English proficiency under Title VI, it is important to note that American Sign Language (ASL) and communication access for riders who are Deaf, Deaf-blind or hard of hearing are addressed separately under the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. Under these requirements, TriMet ensures effective communication through qualified ASL interpreters, Video Remote Interpreting (VRI), captioning, or other auxiliary aids. These obligations are tracked, funded and reported independently of Title VI. More information about TriMet’s ADA accessibility resources is available at trimet.org/accessibility.

For this plan, “Limited English Proficiency” refers to individuals identified by the U.S. Census Bureau as speaking English less than “very well.” These individuals may face challenges in understanding important information related to public transportation. We are committed to doing our part in reducing these barriers by offering meaningful access through translated materials, interpretation services, and community-informed strategies.

Since the last Language Access Plan update in 2019, we have made significant progress in expanding language services, strengthening internal collaboration, and engaging more meaningfully with multilingual communities. This updated plan outlines new goals, staff training, and agency-wide initiatives that reflect emerging best practices and federal compliance requirements.

In addition to being a regulatory obligation, this plan reflects our values. We are proud to serve a multilingual region. We recognize that thoughtful, people-first planning is key to building trust, improving service, and meeting the needs of all of our riders.

We look forward to implementing this plan in partnership with our community and staff and continuing to build a transit system that is safe, accessible, and responsive to the needs of all who depend on it.

Executive Summary

2025 Language Access Plan Overview

We remain committed to providing meaningful access to transit services for people who speak languages other than English. In compliance with Title VI of the Civil Rights Act of 1964, the 2025 Language Access Plan outlines our agency's strategy for reducing language barriers and improving service equity across our district.

Limited English Proficient Population Identification

According to 2019–2023 American Community Survey data, and the US 2020 Census, approximately 112,630 individuals (7.2%) in our service area identify as having limited English proficiency. Each of these languages meets the federal Safe Harbor threshold of 5% of the population or 1,000 speakers. The ten most commonly spoken languages among people with limited English proficiency are:

- Spanish (45.9%)
- Vietnamese (11.7%)
- Chinese – Mandarin/Cantonese (10.1%)
- Russian (4.8%)
- Korean
- Ukrainian
- Arabic
- Japanese
- Tagalog
- Farsi

Language Access Plan Activities

Our Language Access Plan is built on two strategic pathways: sustaining core practices and expanding our customer focus. This approach allows us to expand both public-facing efforts and internal strategies for staff and resource development to support the overall program.

Sustaining Core Practices

We will continue supporting proven programs that address language access needs across the region:

- Phone interpretation services in 240+ languages
- Translated print and digital materials
- Multilingual website content
- Ongoing community partnerships with organizations serving communities that speak languages other than English

Expanding Strategic Focus

The Language Access Plan identifies four areas for deeper investment:

- **Language Assistance Services:** Translation of vital documents, in-person interpretation, and multilingual digital tools, all at no cost to riders.
 - We will provide language assistance at no cost for outreach documents and in-person services. The plan also outlines how we identify vital documents for translation and determine the most effective formats for communication.
- **Notices to Multilingual Communities:** Clear signage, translated outreach materials and system-wide communication about available language assistance and Title VI rights.
 - Outlining guidance for providing notice of language assistance on outreach documents on the system and providing notice of the Title VI complaint process.
- **Monitoring and Evaluation:** Regular updates to the Language Access Plan based on best practices, demographic shifts, and community feedback.
 - Providing guidance for monitoring and compliance of the Language Access Plan, setting standards for translation and interpretation services, and tracking program research and administration.

- **Staff Training:** Annual training for frontline staff and other employees on respectful service delivery and language access procedures.
 - Outlining steps for incorporating language access training into staff development to ensure frontline and relevant personnel are equipped to assist individuals with limited English proficiency.

Annual Implementation Highlights

From fiscal year 2024 through fiscal year 2025, we expanded our multilingual outreach through a robust calendar of community events and strategic partner collaborations. Over this period, the community engagement team participated in over 100 community events, including the Children’s Festival, Lunar New Year Celebrations and newcomer school districts events, reaching more than 81,000 attendees. These events provided opportunities to connect with riders, distribute multilingual educational materials, and share fare access resources and tools. While this subset of events focused mainly on general engagement they complemented broader agency efforts that included multilingual staffing at over 40 community gatherings, translated surveys and direct engagement in more than a dozen languages. Together with internal procedure updates and increased community partnerships, these activities reaffirm our continued commitment to language access and community responsiveness.

FY22–FY24 Implementation Highlights

- Conducted a complete program evaluation of Access Transit services and developed strategic approaches to multilingual communication.
- Transitioned community partner funding from contracts to grant agreements to allow more flexibility and support.
- Released the Spanish version of the low-income fare application and drafted translations in other Safe Harbor languages.
- Expanded enrollment support and translated resources in all 10 Safe Harbor languages.
- Grew the enrollment partner network to over 40 organizations, extending support to speakers of more than 20 additional languages, including Dari, Fijian, and Chuukese.
- Updated internal procedures in our fare programs and established new strategies for serving languages beyond the top Safe Harbor thresholds.

- Assigned multilingual staff to events with at least 20 outreach events staffed in Spanish, Vietnamese, Russian, Farsi, Arabic, and Rohingya.
- Continued to align agency resources, staffing and outreach activities with evolving community needs across our service area.
- Printed materials that include Welcome Aboard ride guides, produced in 13 languages.
- Developed and printed Meet Our Team and Honored Citizen reduced fare brochures in multiple languages.
- Installed Falcon devices and Braille signage for riders who are blind or have low vision.

Leadership and Commitment

TriMet's Public Access & Innovation Division leads the Language Access Plan implementation, working closely with departments across the agency to provide guidance and consultation on language access needs. In partnership with the Public Affairs Division, TriMet will continue to prioritize outreach to communities that speak Safe Harbor languages and engage trusted community partners to support community-responsive engagement strategies.

The Language Access Plan is a living document, updated every three years based on feedback, best practices and federal compliance guidance. The plan reflects our ongoing dedication to ensuring all riders can access services, understand their rights, and participate fully in our programs and utilize our services.

2025 Language Access Plan

We are committed to ensuring riders with limited English proficiency can access the information and services they need and share their feedback on how we can improve access. This plan outlines the steps we will take to engage with various communities, address gaps in access, create opportunities for community members to get involved and provide ways for both community members and employees to contribute. This plan advances TriMet 2030's goals and adapts as the region grows.

Goals of the Language Access Plan

- **Prioritize Limited English Proficient Communities:** We will continue to prioritize communities with limited English proficiency by ensuring they have meaningful access to our programs and services.
- **Develop Intentional Standards and Tools for Staff:** The Language Access Program will develop and maintain resources, tools, guidelines, and protocols to ensure staff can provide consistent and effective assistance to communities and riders who speak languages other than English.
- **Provide Staff Training:** We will ensure training is available for employees, particularly front line staff who interact directly with the riders and communities that speak languages other than English. Training will focus on respectful communication, language access strategies and cultural competence.
- **Sustain and Grow Resources:** We will continue to invest in the programs and services necessary (staff, training, partnerships, funding, technology, etc.) to support language access initiatives and programs.
- **Research, Update and Implement Best Practices:** We will regularly review best practices and work to ensure our language access efforts align with emerging practices for communities that speak languages other than English.

Updating the Language Access Plan

To ensure our Language Access Plan provides meaningful access communities that speak languages other than English and reflects the needs of hard-to-reach communities in our service area, we conducted comprehensive community and internal staff surveys in 2024– 2025. The data gathered from the surveys provided valuable insights that informed our plan’s goals, implementation strategies, and next steps.

Community Survey Process

The community language access survey was developed in consultation with community partners and translated into 16 languages, including all our Safe Harbor languages and emerging languages. The survey yielded **3,347 responses**, making it one of the most significant initiatives to gather language access feedback in our history.

Key themes from community responses include:

- **Information Gaps:** Many respondents with limited English proficiency reported difficulty finding transit information in their native language, particularly regarding service alerts, fare programs, and how to ride.
- **Low Awareness of Language Services:** A majority of respondents were unaware TriMet offers interpretation or translated materials. Respondents suggested adding more signage, outreach, and public messaging in community languages.
- **Preferred Communication Channels:** Riders expressed a preference for receiving information through printed materials, community-based organizations, ethnic radio stations, and social media content in their native language.
- **Barriers to Access:** Language barriers were reported to impact access to safety messages, customer service and fare payment systems. Community members requested more straightforward instructions and relevant materials.
- **Desire For Representation:** Many respondents who spoke languages other than English asked for more multilingual staff and respectful outreach at events and transit centers.

This feedback emphasized the importance of making language access more visible, proactive and tailored to hard-to-reach communities, especially in rapidly growing immigrant communities across our service area.

Staff Survey Process

We also conducted an internal survey focusing on frontline and customer-facing employees to assess their experience with language access tools, services and procedures.

Key findings from staff responses include:

- **Training Gaps:** Many front line employees were unsure how to access over-the-phone interpretation or how to access translated materials. Some had never received training on Title VI or language access protocols.
- **Need for Practical Guidance:** Staff requested clear, easy-to-use instructions and quick-reference tools to facilitate real-time interactions with riders who speak languages other than English.
- **Use of Bilingual Skills:** Bilingual staff reported being frequently asked to assist riders who speak other languages, but noted their language skills are often unofficially utilized and not formally recognized or compensated.
- **Support for Bilingual Staff:** There was overwhelming support for recruitment and retention of staff who reflect the communities in our service area. The data highlighted that bilingual staff utilize their language skills as part of their daily duties.

Together, the community and staff surveys reinforced the need for expanded training, clearer procedures and more consistent public communication. This feedback will inform the development of new tools, goals and accountability measures included in this plan, ensuring our language access work remains grounded in the lived experience of multilingual communities, compliance obligations and a human-centered approach.

Language Access Plan Update Process

We recognize the importance of updating and improving our Language Access Plan to meet the linguistic needs of our riders and communities with limited English proficiency. The process to update the language access plan included:

- **Prioritizing Community Needs in Community Engagement:** Through a series of Meaningful Participation Services Contracts, we collaborated with community-based organizations, faith-based communities and non-profit organizations that primarily serve multilingual populations. These partnerships mirror the range of languages spoken by the populations in our service area. Currently, over 40 community-based organizations and culturally-specific vendors are contracted through the Meaningful Participation Outreach contract.
- **Best Practices Research:** We will use best practices from the Federal Transportation Administration (FTA), Oregon Department of Transportation (ODOT) and other relevant agencies to guide the development, implementation and execution of the Language Access Plan.
- **Utilizing the International Association for Public Participation (IAP2) Standards and Community Engagement Spectrum:** This model guides our approach to engaging communities with limited English proficiency. We will move beyond informing and consulting to more engaging approaches, such as collaborating to create meaningful opportunities for people that speak languages other than English to help shape the commitments outlined in this plan.

Three-year Language Access Implementation Plan

To guide the implementation of our Language Access Plan over the next three years, we have identified five strategic goals. These goals are outlined in the table below to highlight which goals will be addressed first and what we will build on over time. The three-year strategy outlines how different divisions across our agency will contribute to the long-term success and sustainability of language access efforts.

Table 1 outlines foundational efforts in year one, development work in year two and sustainability goals in year three. This phased approach ensures our language access efforts are realistic, actionable and aligned with the available resources while meeting our civil rights obligations and improving service for all. Moreover, we have selected priority areas based on community needs, legal mandates, staff and community feedback and operational feasibility.

Table 1: 3-Year Implementation Plan

Priority Area	Key Activities	Timeline
Community Engagement	<ul style="list-style-type: none"> Establish the Language Access Advisory Committee. Distribute community and rider surveys regularly across multiple languages and through multiple channels. Host focus groups with riders with limited English proficiency in partnership with community organizations. Design and distribute “I Speak” cards and posters at key TriMet service areas and partner sites. Pilot new LEP rider growth strategies. Develop and launch new LEP rider training. 	FY26-FY28
Staff Training	<ul style="list-style-type: none"> Develop and launch LEP training for all frontline staff. Develop and deliver training to project managers and frontline staff. Implement a feedback loop system to capture and incorporate community and staff feedback. Update and deliver the annual Title VI and Language Access training. 	FY26-FY27
Translation & Interpretation	<ul style="list-style-type: none"> Identify and prioritize vital documents for translation. Develop SOPs for translation vendors and Smartling workflows to ensure consistency and accountability. Identify signage in priority areas for translation. 	FY26-FY28
Technology & Tools	<ul style="list-style-type: none"> Develop and distribute communication guides. Monitor and update <i>trimet.org</i>. Integrate software into translation options. 	FY26-FY28
Monitoring & Evaluation	<ul style="list-style-type: none"> Create feedback loops for community, staff and vendors Conduct reviews of language access activities, training and vendor performance. Track and analyze language needs, requests and areas for improvement. 	FY26-FY28

Priority Areas for Action

Language Access Needs Survey:

- **Data Collection:** We will continue to update our language access surveys and engagement strategies to ensure the unique linguistic needs of people that speak languages other than English are accurately represented in program goals and commitments. The data collected will include analysis of U.S. Census data, American Community Survey data, local school district data, rider and community feedback and input from community-based organizations that work directly with multilingual communities.
- **Priority Languages:** Based on data and consultation with Public Affairs staff and community organizations, we will continue identifying priority languages for translation and interpretation services. We will ensure the most widely spoken languages are addressed while prioritizing Safe Harbor languages.

Intentional Standards and Tools for Staff:

- **Language Access Tools:** The Language Access Program will create and maintain a comprehensive toolkit for staff. The toolkit will include items and information such as:
 - Language identification cards and posters for riders with limited English proficiency (e.g., “I Speak” cards and posters).
 - Guides for staff across the agency to help provide multilingual services or connect riders who speak languages other than English with interpreters when needed.
 - Digital tools that provide timely language assistance via phones or electronic devices.
 - Multilingual reader boards.
 - Updated standardized operating procedures and policies to support staff in engaging with riders who speak languages other than English.

Staff Training and Development:

- **Language Access and Title VI Required Training:** All staff who interact with riders will receive annual training in community awareness, language access procedures, and best practices for working with riders who speak languages other than English.
- **Ongoing Training and Evaluation:** To ensure continued practice and proficiency we will implement updated trainings and evaluations as needed. Updates will incorporate and prioritize feedback from riders and communities that speak languages other than English.

Performance Measures:

We will establish measurable performance goals related to the implementation and execution of language access services across our agency. These goals will prioritize:

- Notifying riders and communities that speak languages other than English of their Title VI Civil Rights and Language Access rights.
- Ensuring timeliness and effectiveness of language services upon request.
- Measuring customer satisfaction among riders who speak languages other than English.
- Expanding availability of translated materials to communities that speak languages other than English.
- Ensuring access to vital documents and information in multiple languages.

Program Evaluation, Monitoring and Accountability: The Language Access Program will develop a monitoring system to assess whether the goals and commitments outlined in the Language Access Plan are being met.

Resource Allocation and Program Sustainability:

- **Budget Commitment:** We identify and allocate funding to support language access services including, but not limited to, interpretation services, translation of vital documents, information and program materials, staff training and access to relevant technology.
- **Staffing Resources:** Leadership will assign dedicated staff from various divisions to oversee the implementation of the Language Access Plan, liaise with respective department leadership, participate in the Language Access Advisory Committee and ensure the quality of translated materials.

Research and Best Practices

We are committed to aligning our Language Access Plan with current research, community needs and best practices by using data, community feedback and partnerships to improve access for riders who navigate our system in languages other than English.

- **Staying Aligned with Industry Standards**

We will monitor federal and state guidelines, particularly from the Federal Transit Administration to ensure full compliance and alignment with evolving requirements for language access in public transportation. We will also study the policies of peer transit

systems to adopt proven approaches to translation, interpretation and equitable service delivery.

- **Ongoing Research and Community Input**

We will prioritize research that strengthens service for multilingual riders, including but is not limited to:

- Using data from the U.S. Census, American Community Survey and local school districts to assess language needs.
- Conducting surveys, focus groups and outreach to understand language preferences and rider experiences.
- Evaluate and review existing translation and outreach services to identify and address service gaps and cultural and linguistic accuracy.

Community feedback from riders who speak languages other than English, frontline staff, and community-based organizations is vital to shaping and refining our approach. This ensures our Language Access Plan goals and strategies remain relevant and responsive to the needs of riders who speak languages other than English.

Benchmarking and Collaboration:

TriMet benchmarks its language access work against other leading transit agencies and collaborates with community-based-organizations (CBOs) to engage hard-to-reach populations. These community partnerships help tailor services to the specific needs of local communities and ensure the development of meaningful engagement strategies.

Innovation and Technology

To improve multilingual access, we have invested in technologies to advance multilingual touch points for riders who speak languages other than English. Including:

- Multilingual websites
- AI powered translation tools
- Real-time voice and text translation
- Multilingual alerts and signage at stops and platforms

These tools help ensure riders receive timely and accessible information, regardless of language.

Transparency and Accountability

To identify areas of improvement, we will share updates on the progress made towards language accessibility, community feedback, and service delivery. By setting clear accountability measures, we can evaluate how well language services meet the needs of the region's communities that speak languages other than English.

Plan Implementation

Over the course of the plan period, we will implement research findings into actionable strategies, ensuring that identified language access approaches are integrated into operations to the greatest extent possible.

We are committed to providing meaningful access to our transit services for all people, including those who communicate in languages other than English. Updates to the Language Access Plan reflect our agency's dedication and commitment to improving meaningful communication, improving customer service and compliance with Title VI requirements and federal guidelines. By prioritizing communities that speak languages other than English, developing clear standards and tools and setting measurable goals, we will continue to meet the evolving needs of our riders while aligning with best practices for language access. The plan will be reviewed every three years and updated as needed to reflect changes in multilingual population trends, technological advancements and language access best practices.

Four Factor Analysis

The Four Factor Analysis is the framework for understanding how to allocate language assistance resources. It helps TriMet identify community language needs, evaluate the frequency and importance of interactions with riders who speak languages other than English and assess current resources and gaps. Driven by data, community feedback and industry standards, the Four Factor Analysis ensures our approach is fair and practical by aligning our language access efforts with the needs of our multilingual riders.

The Four Factor Analysis in this plan explains how findings inform TriMet's overall Language Access Plan including the development of translation services for vital documents, translation and interpretation priorities, staff training, vendor coordination and meaningful outreach.

Factor 1

The number and proportion of people who speak languages other than English who are served or likely to be encountered by a TriMet program, activity or service.

2019- 2023 American Community Survey 5-Year Sample:

The U.S. Census Bureau collects data on individual's English-speaking ability and language spoken at home through the American Community Survey (ACS). ACS identifies individuals who report speaking English "less than very well," classifying them as people with limited English proficiency. Recognizing these populations is essential for assessing the need for translated materials, particularly in languages that meet Safe Harbor thresholds. According to U.S. Department of Transportation (DOT) guidance, Safe Harbor thresholds are defined as 5% of the total population or 1,000 individuals - whichever is less.

This analysis used 2019–2023 ACS 5-year data for the TriMet service district, which includes most of Clackamas, Multnomah and Washington counties. For the initial phase of the Factor 1 Analysis, TriMet estimated the population of people with limited English proficiency within our service area and mapped their geographic access to TriMet bus and rail services.

Safe Harbor guidance recommends written translation of vital documents for each language group with 1,000 individuals with limited English proficiency (TriMet's lower threshold). Oral interpretation may be

used for other languages as needed. While not meeting the Safe Harbor threshold does not indicate non-compliance, following these guidelines demonstrates compliance with federal requirements.

Population Figure

As shown in Table 1, American Community Survey (ACS) data indicates that people with limited English proficient (LEP) individuals make up approximately 7.2% of the total population aged five years and older within the TriMet district – an estimated 112,630 individuals out of 1,568,872. Spanish speakers account for the largest share of this group (3.3% of the total population and 46% of the LEP population), followed by Vietnamese speakers (0.8% of the total population and 11% of the LEP population). Ten languages meet the Safe Harbor threshold with the TriMet service area of 1,000 individuals with limited English proficiency.

Table 1: Languages spoken by LEP persons age 5 and older

Languages Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	51,401	3.3%	45.9%
Vietnamese	13,144	0.8%	11.7%
Chinese (Cantonese, Mandarin)	11,293	0.7%	10.1%
Russian	5,387	0.3%	4.8%
Korean	3,325	0.2%	3.0%
Ukrainian	2,761	0.2%	2.5%
Arabic	2,485	0.2%	2.2%
Japanese	1,766	0.1%	1.6%
Tagalog	1,628	0.1%	1.5%
Persian/Farsi	1,234	0.1%	1.1%
Other (e.g., Romanian and Somali)	17,557	1.1%	15.7%
Total TriMet LEP Population	112,630	7.2%	

Source(s): TriMet GIS, Metro Regional Land Information System, and US Census Bureau (Tables B16001 and C16001, 2024)

Population Mapping and TriMet Service Coverage

To better understand how TriMet's bus and rail services align with the needs of communities that speak languages other than English, population data by language category was plotted across a series of maps. These maps overlay TriMet's transit network with the geographic distribution of populations with limited English proficiency within the service district. These visualizations support the Factor 1 analysis by identifying areas with high concentrations of specific populations with limited English proficiency and assessing their proximity to TriMet's services.

The figures below, presented on the subsequent pages, illustrate these spatial relationships:

Figure 1: LEP Populations Distribution

Figure 2: Distribution of Spanish-Speaking LEP Populations

Figure 3: Distribution of Vietnamese-Speaking LEP Populations

Figure 4: Distribution of Chinese-Speaking LEP Populations

Figure 5: Distribution of Russian-Speaking LEP Populations

Figure 6: Distribution of Korean-Speaking LEP Populations

Figure 7: Distribution of Ukrainian-Speaking LEP Populations

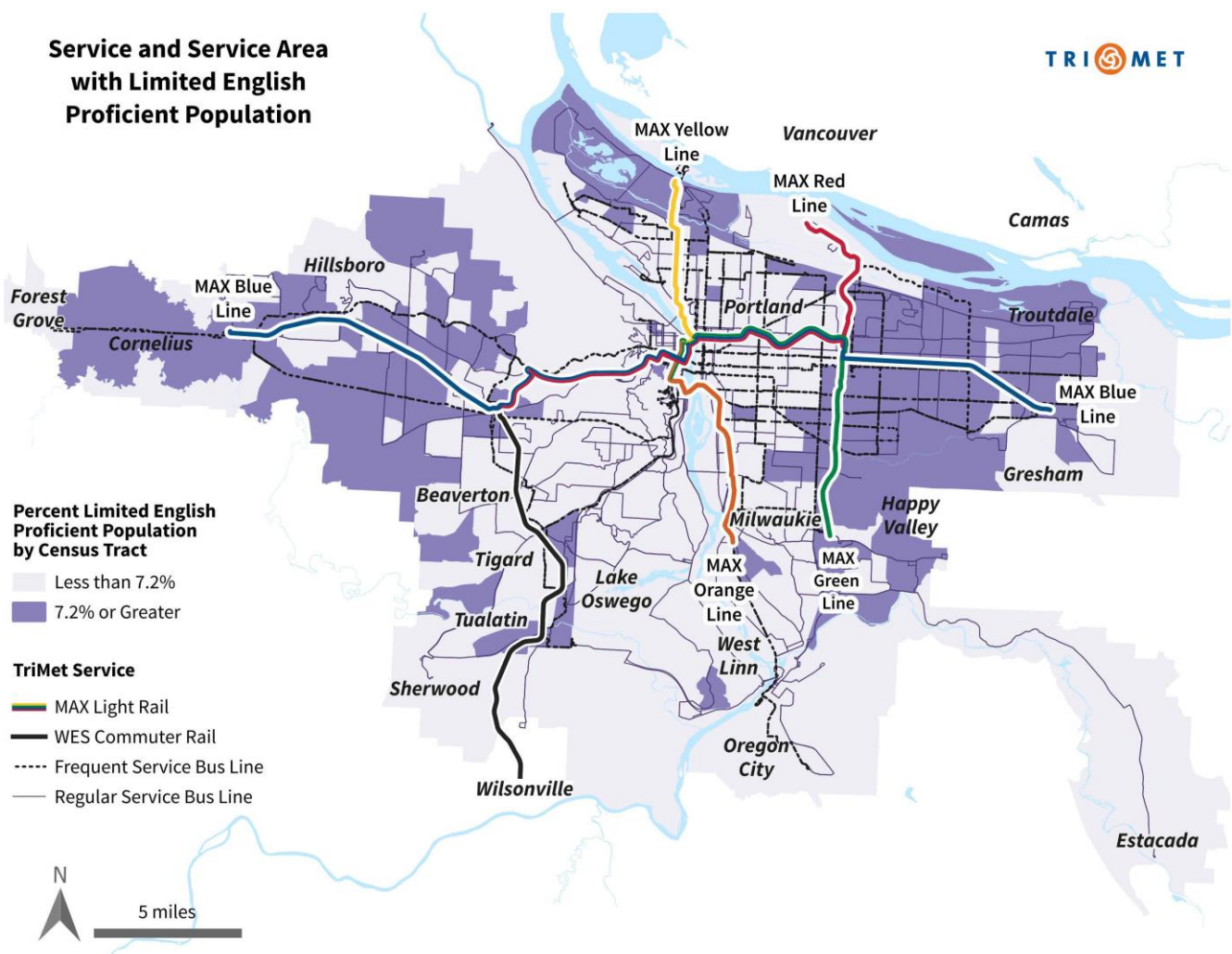
Figure 8: Distribution of Arabic-Speaking LEP Populations

Figure 9: Distribution of Japanese-Speaking LEP Populations

Figure 10: Distribution of Tagalog-Speaking LEP Populations

Figure 11: Distribution of Persian-Speaking LEP Populations

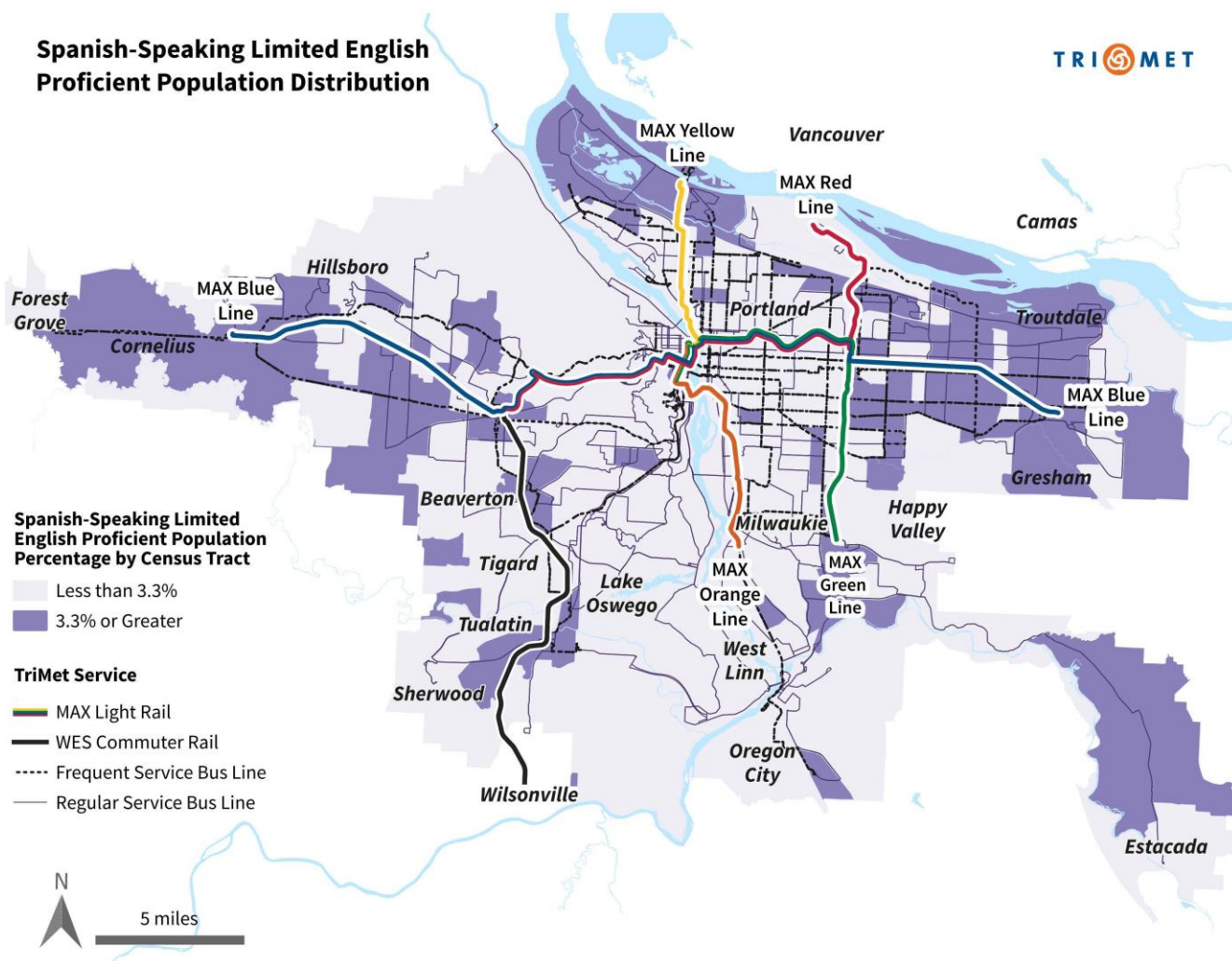
Figure 1: LEP Populations Distribution



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

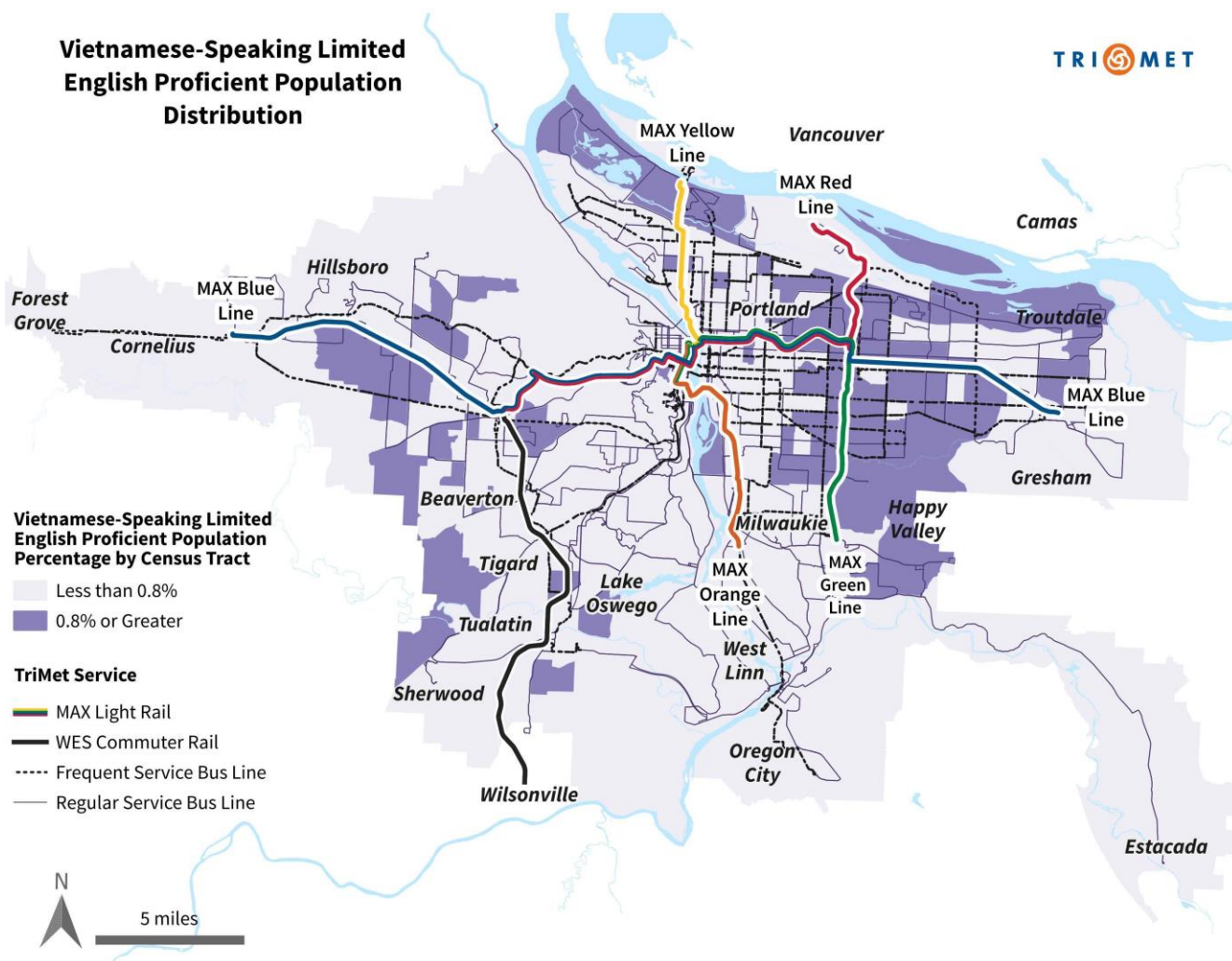
Figure 2: Distribution of Spanish-Speaking LEP Populations



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates.

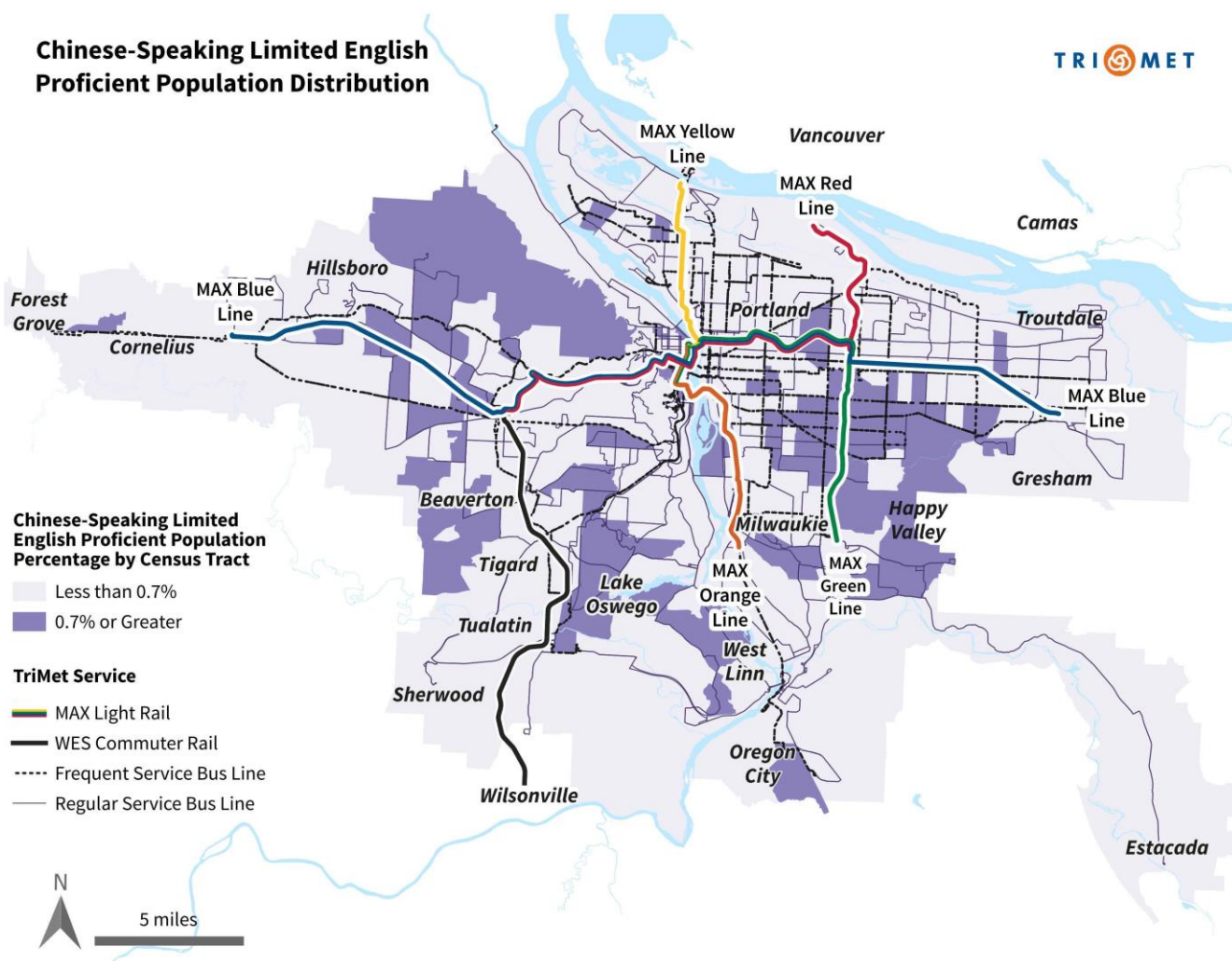
Figure 3: Distribution of Vietnamese-Speaking LEP Populations



A person with Limited English Proficient (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

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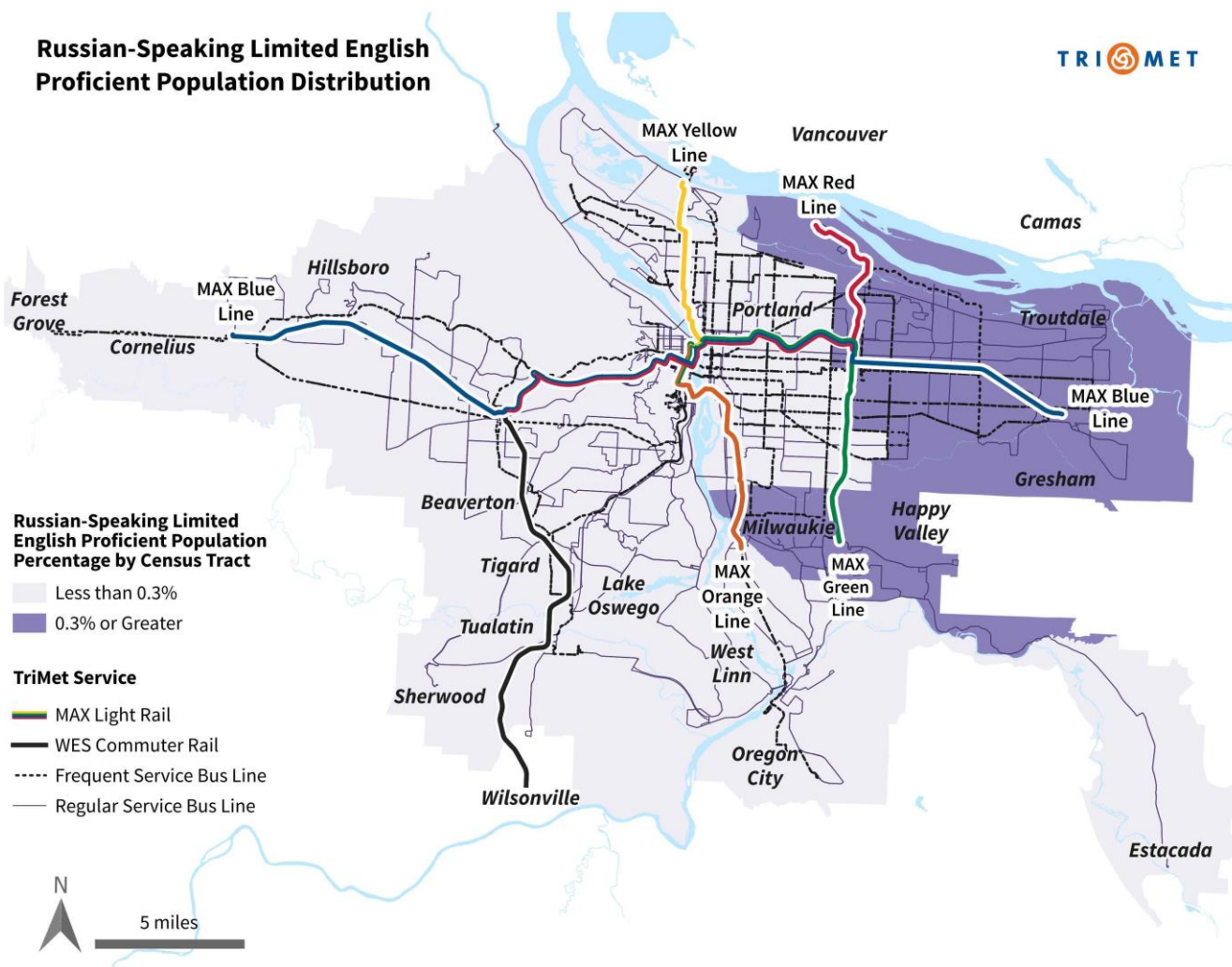
Figure 4: Distribution of Chinese-Speaking LEP Populations



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

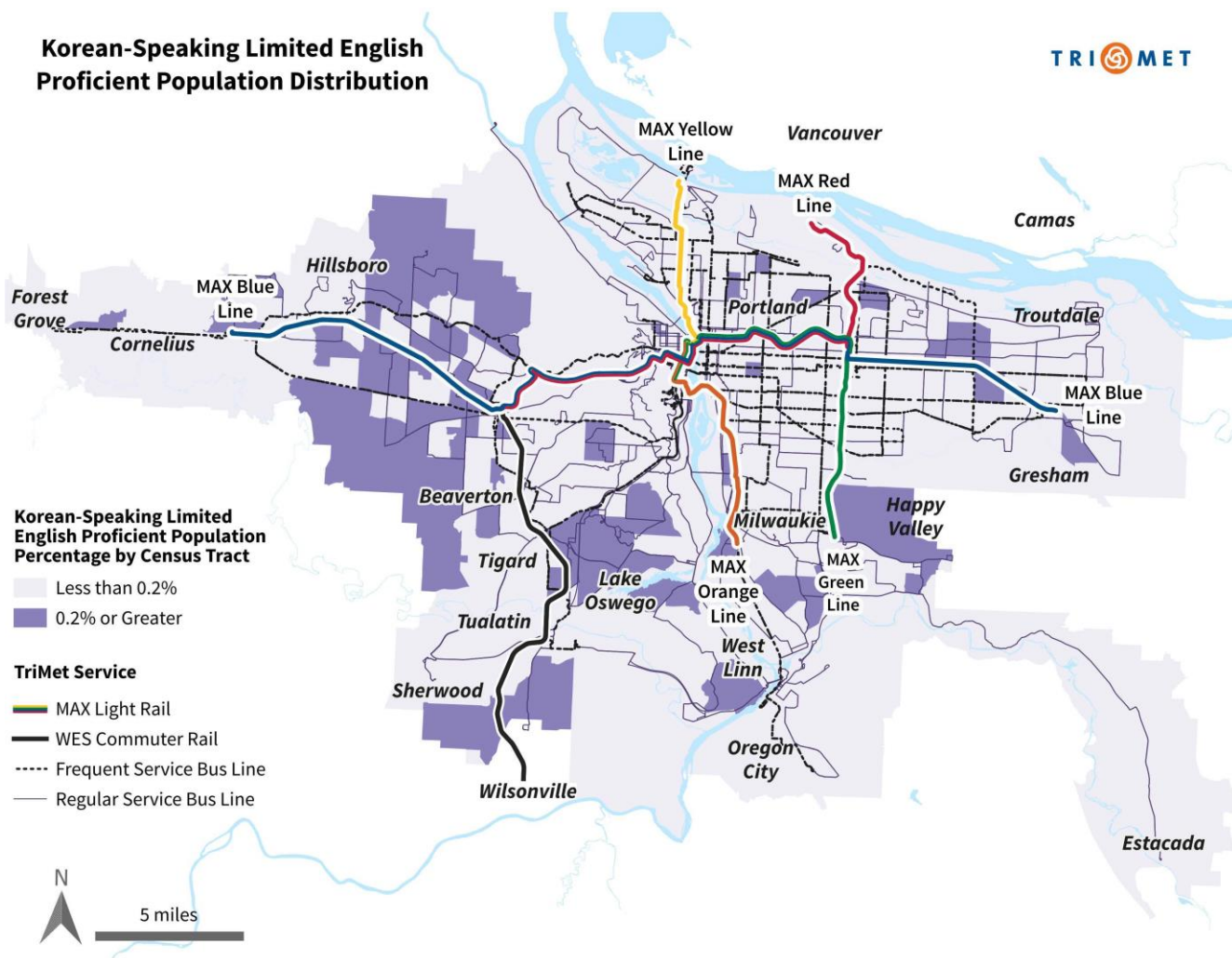
Figure 5: Distribution of Russian-Speaking LEP Populations



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

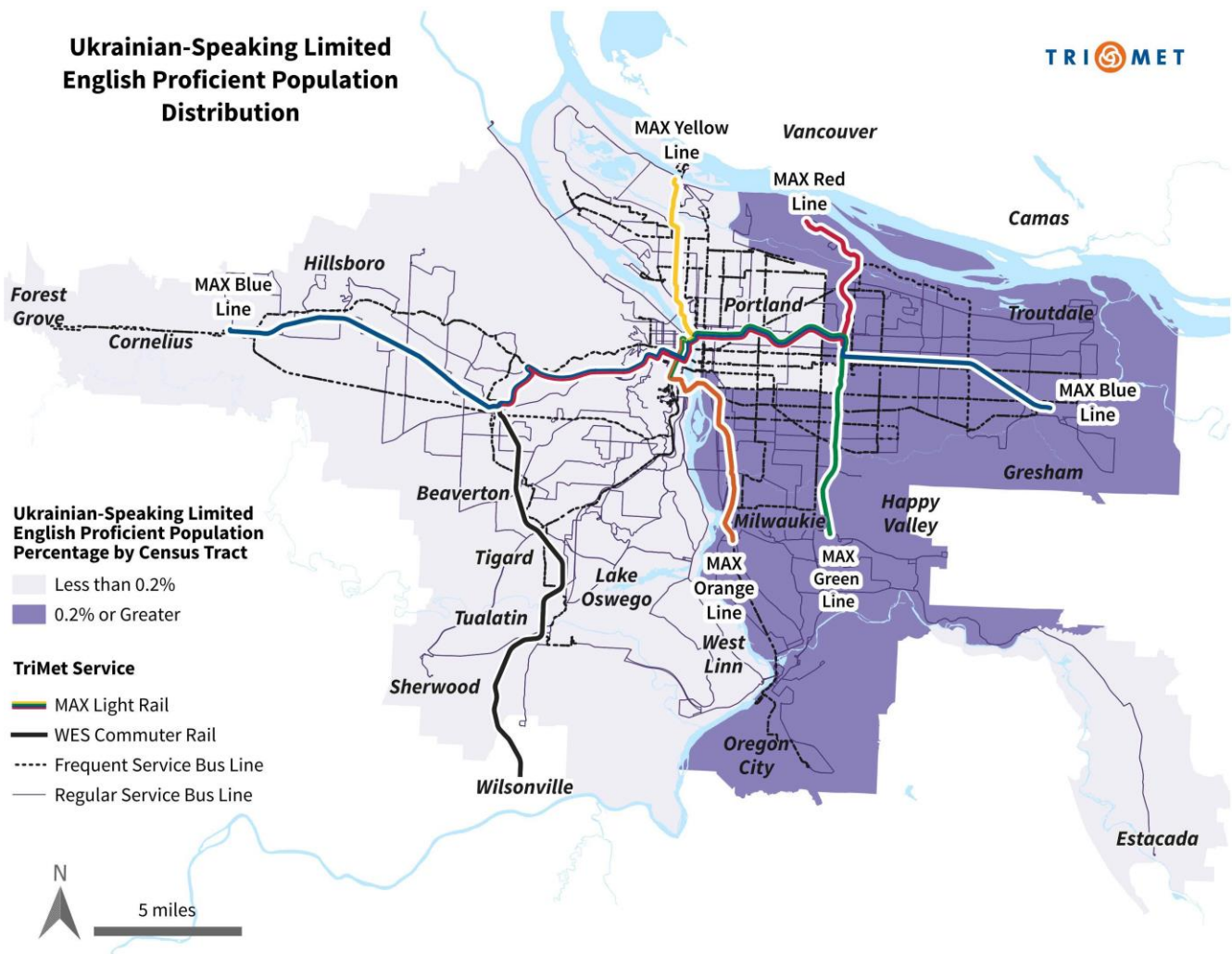
Figure 6: Distribution of Korean-Speaking LEP Populations



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

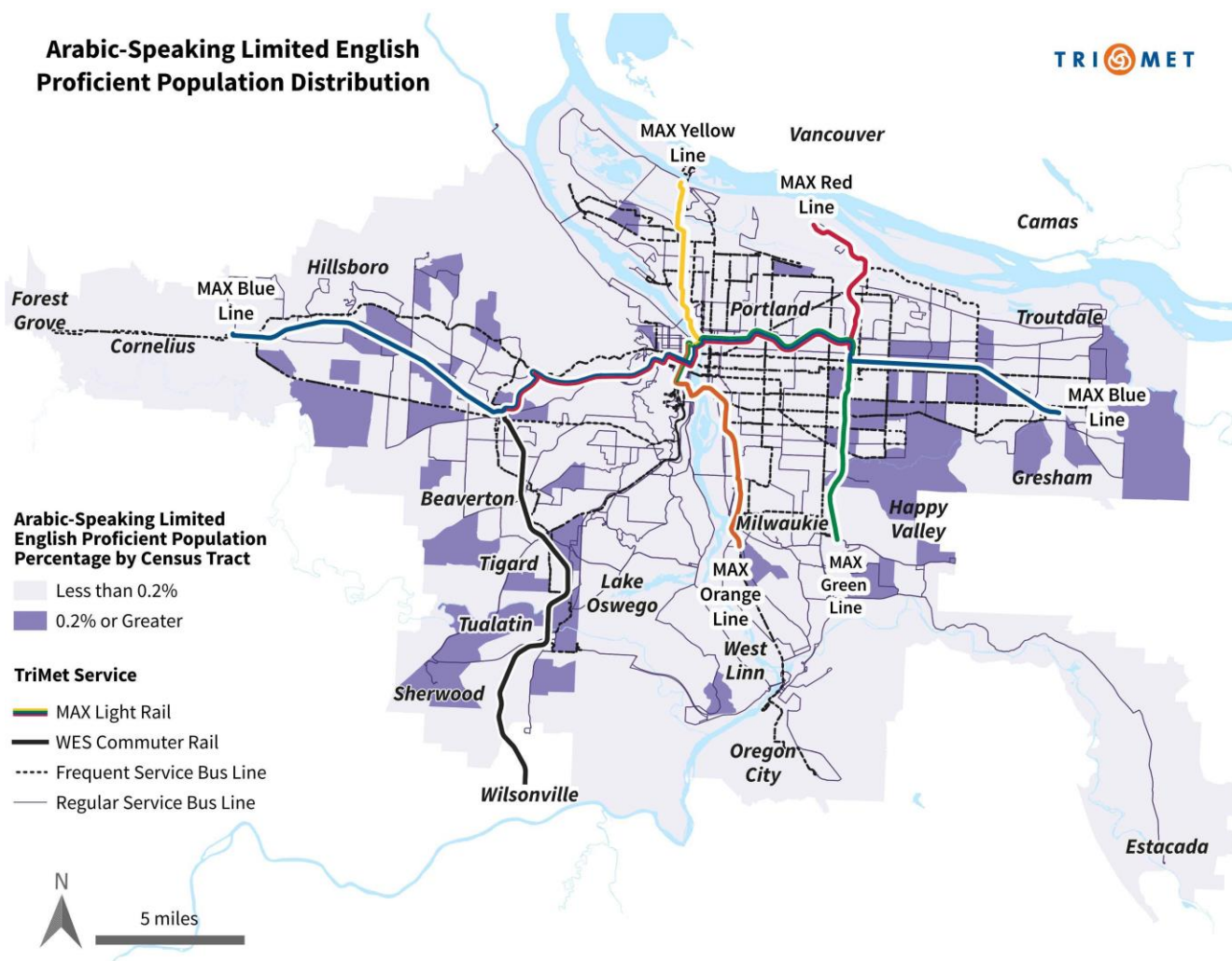
Figure 7: Distribution of Ukrainian-Speaking LEP Populations



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

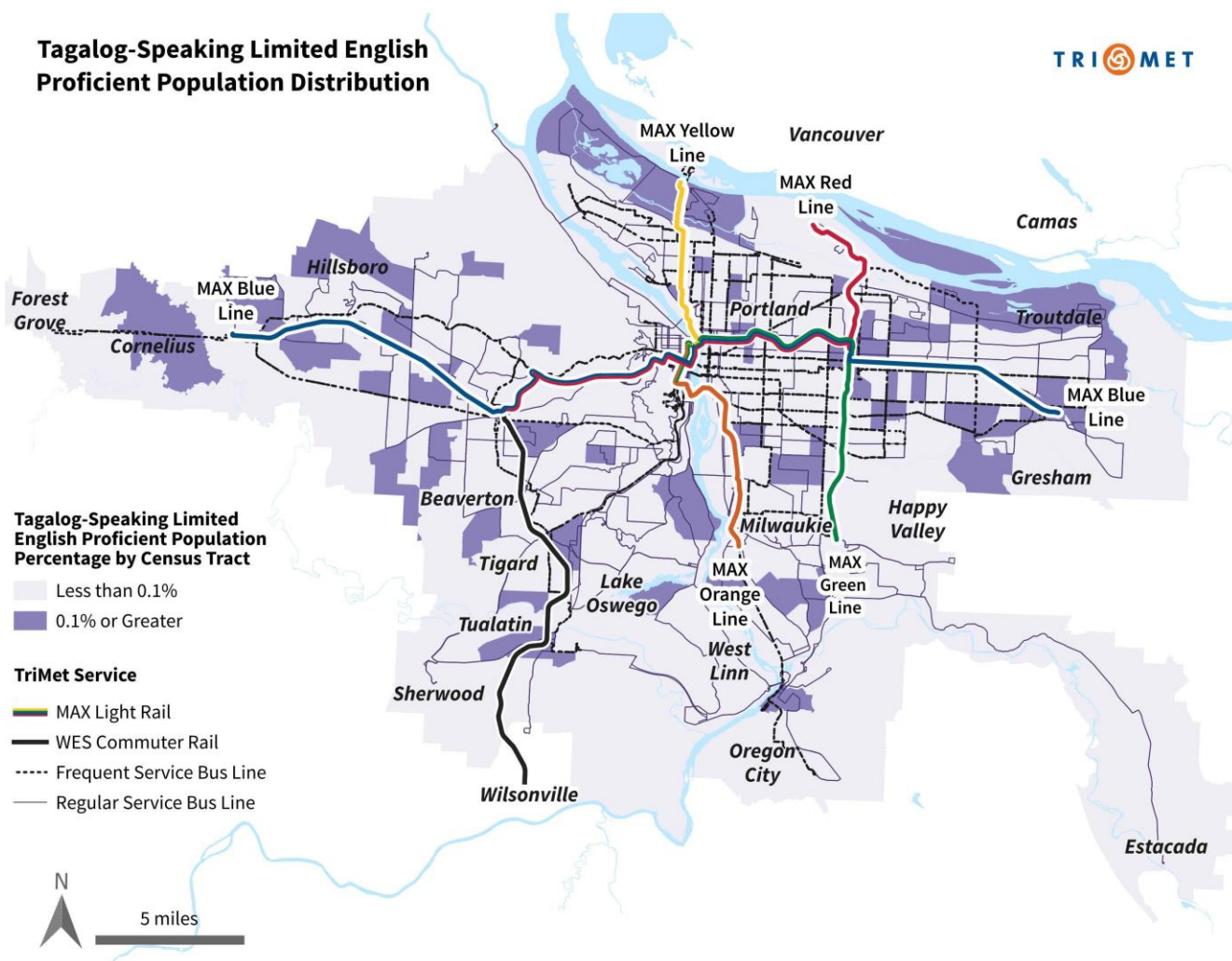
Figure 8: Distribution of Arabic-Speaking LEP Populations



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

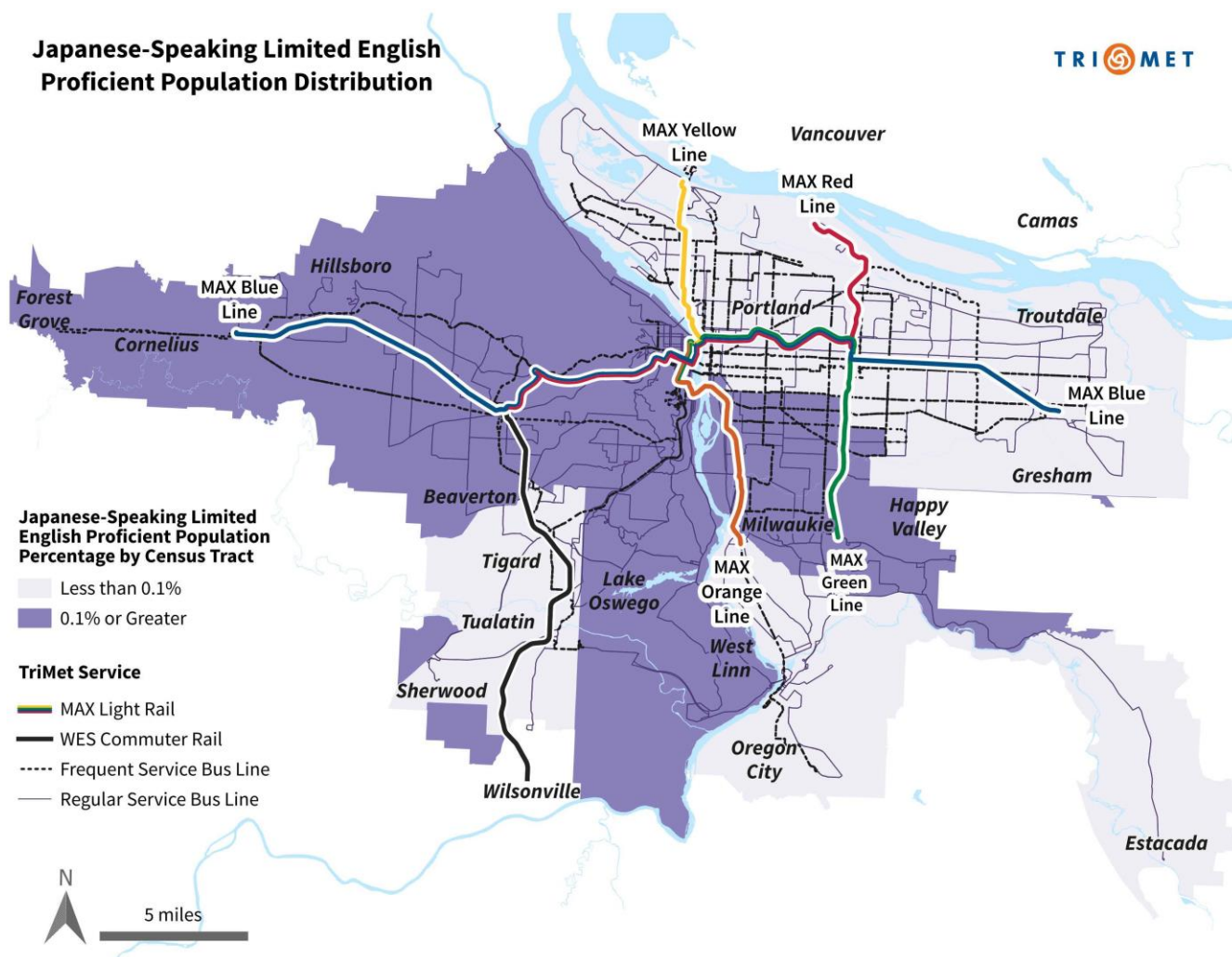
Figure 9: Distribution of Tagalog-Speaking LEP Populations



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

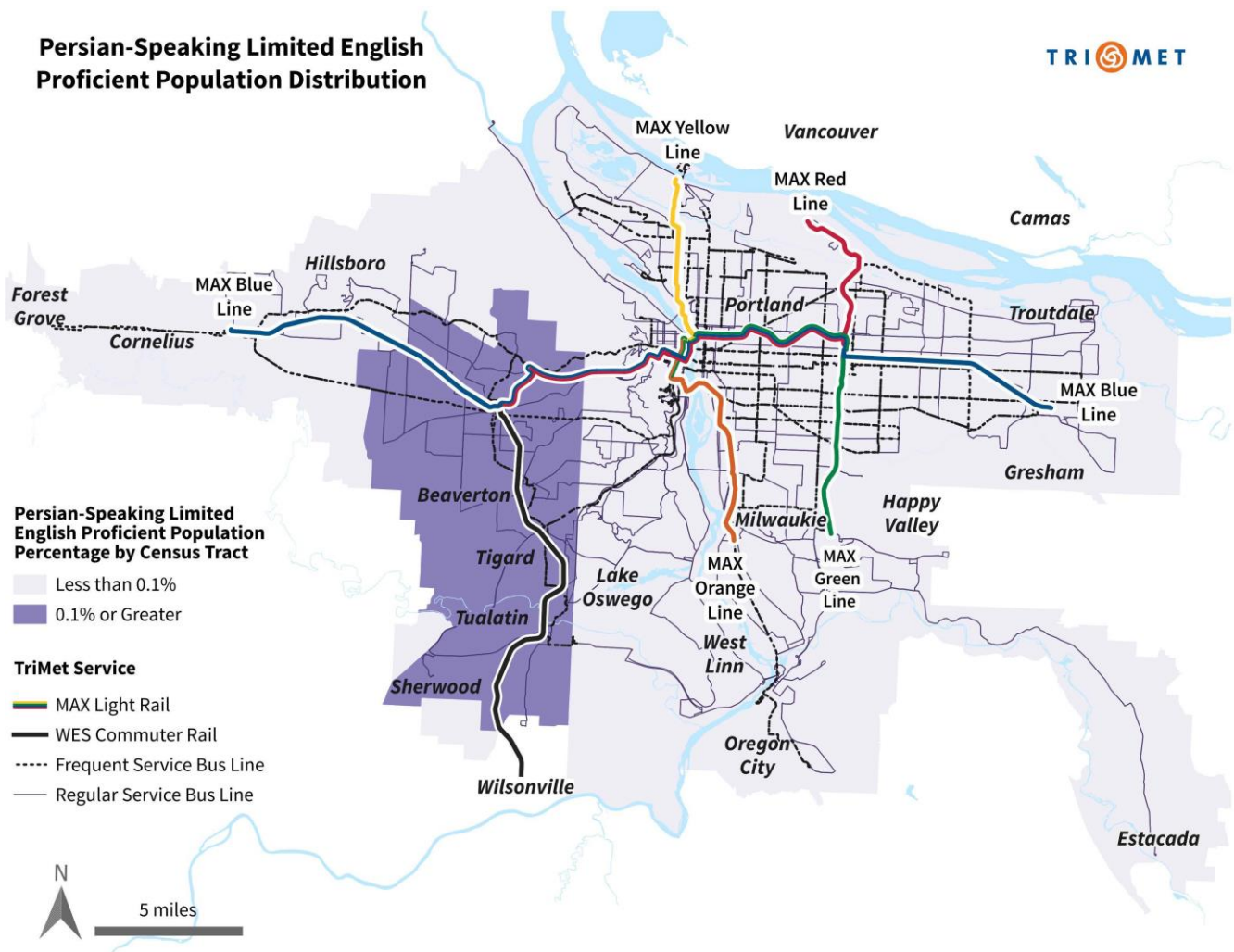
Figure 10: Distribution of Japanese-Speaking LEP Populations



A person with Limited English Proficient (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

Figure 11: Distribution of Persian-Speaking LEP Populations



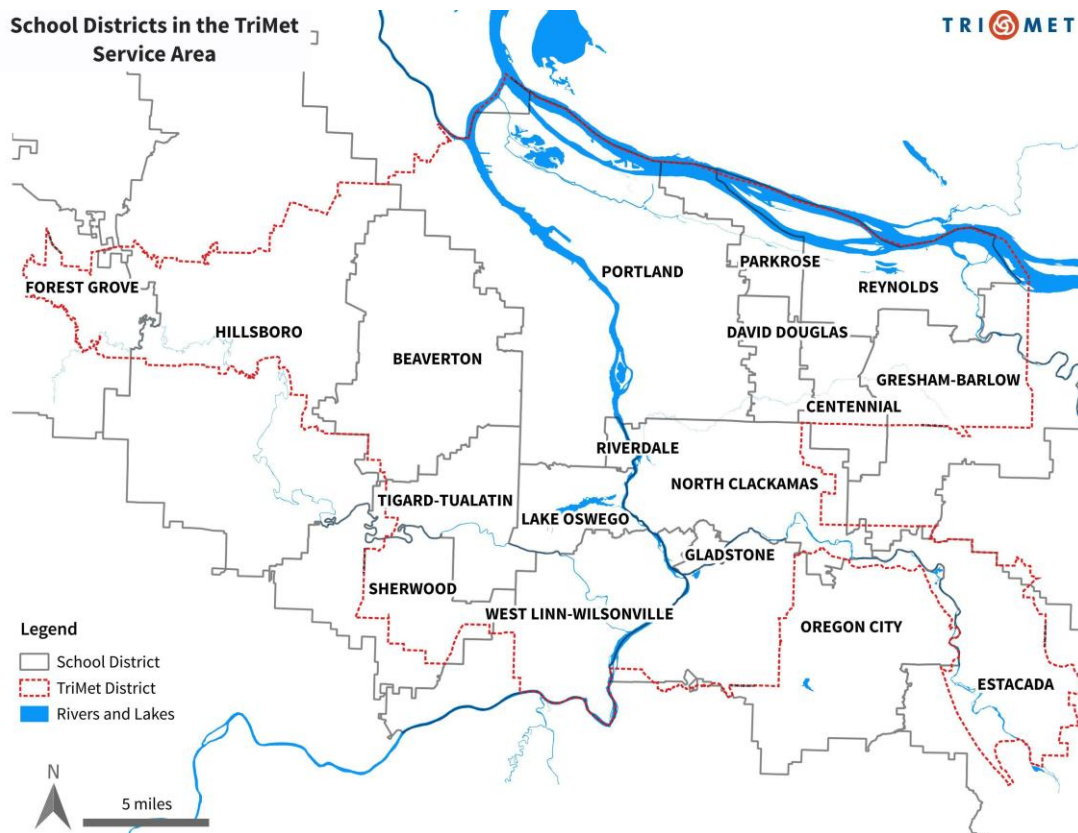
A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

Oregon Education Department

In addition to American Community Survey (ACS) data, which includes individuals aged five and older, Factor 1 also considers the population of English Language Learners (ELL) within school districts in TriMet's service area. ELL students are defined as students with limited English proficiency. This data is included based on the assumption that if a child speaks a language other than English at home, their parents or guardians likely do as well. Data was collected from the following K–12 school districts within TriMet's service district: Beaverton, Centennial, David Douglas, Estacada, Forest Grove, Gladstone, Gresham-Barlow, Hillsboro, Lake Oswego, North Clackamas, Oregon City, Parkrose, Portland, Reynolds, Riverdale, Sherwood, Tigard-Tualatin, and West Linn-Wilsonville. Figure 12 shows the locations of these districts within our service area.

Figure 12: School Districts within the TriMet Service Area



Oregon Education Department (cont.)

Data from the Oregon Department of Education (*At-a-glance district profiles, 2023*) indicate that the TriMet region supports a high population of ELL. This dataset specifically reports on ever ELL, a category that includes both current and former ELL, providing a comprehensive view of students with ELL backgrounds.

The school districts located in the eastern portion of TriMet's service area—Reynolds, David Douglas, and Centennial—report the highest proportions of ELL relative to their total student populations with rates of 45%, 43% and 42%, respectively. Districts in the central and western portions of the region—Hillsboro, Portland, and Beaverton—demonstrate the greatest linguistic differences, with students in these districts speaking 158, 133 and 98 unique languages, respectively (Oregon Department of Education, 2023, *At-a-glance district profiles*).

According to the Oregon Department of Education (*English learners in Oregon, 2023*), the TriMet district includes eight of the ten school districts with the highest number of current ELL students in Oregon: Beaverton, Portland, Hillsboro, Reynolds, David Douglas, North Clackamas, Gresham-Barlow and Tigard-Tualatin. Additionally, three school districts in TriMet's region—Reynolds, Centennial, and David Douglas—rank among the top ten districts in Oregon with the highest percentage of current ELL students relative to their total student populations (Oregon Department of Education, 2023, *English learners in Oregon*).

Although specific data on the languages spoken within each school district in the TriMet region were not readily available, Table 2 presents statewide data from Oregon Department of Education (*English learners in Oregon, 2023*), that identifies the most commonly spoken languages among current ELL students. Given the high concentrations of ELL in TriMet-area districts, it is reasonable to assume that the regional linguistic patterns reflect statewide trends.

According to the report, Spanish is the most widely spoken language among ELL students in Oregon, followed by Russian, Chinese and Vietnamese. These languages likely represent a significant portion of the ELL population within the TriMet region as well.

Table 2: Percentage of most common home languages among Oregon current English Language Learners 2022-2023

Language	Percentage of Current English Language Learners speaking this Language
Spanish	76.0%
Russian	2.6%
Chinese	2.0%
Vietnamese	2.0%
Arabic	1.4%
Chuukese	1.3%
Ukrainian	1.2%
Somali	1.0%

Source: Oregon Department of Education (English learners in Oregon, 2023)

Oregon Judicial Department

Factor 1 also considers top languages requested in courts through the Oregon Judicial Department (OJD) as an additional indicator of Limited English Proficiency population distribution within TriMet's district. To ensure compliance with federal and state language access requirements, the OJD must provide comprehensive language services across Oregon courts. According to the OJD (2022), 57% of all individuals with limited English proficient in the state reside in Multnomah, Washington and Clackamas counties.

The language services provided through the judicial department are an indicator for the language needs of communities with limited English proficiency in a region.

Table 3 from the OJD (2022) highlights the top languages requested for each county in TriMet for 2020. Additionally, Table 4 provides data on the number of court interpreter requests by language category

for the year 2022. These data sets reveal that Spanish, Russian and Vietnamese are among the most commonly requested languages for interpretation services. Notably, Chuukese, Arabic and Somali also appear within the top five languages requested, indicating a growing need for services in these language communities. This data helps to identify trends in language demand within the judicial system, further informing the distribution of populations with limited English proficiency and languages spoken in TriMet’s service district.

Table 3: 2020 Top Five Languages Requested in Court by County within TriMet

Clackamas	Multnomah	Washington
Spanish	Spanish	Spanish
Russian	Russian	ASL
Chuukese	Chuukese	Somali
Vietnamese	ASL	Arabic
Mixteco	Somali	Chuukese

Source: Oregon Judicial Department (2022)

Table 4: 2022 Court Interpreter Requests by Language Category for Counties within TriMet

Language Category	Clackamas	Multnomah	Washington
Spanish	1,471	4,352	5,509
Russian and Vietnamese	269	702	155
Indigenous languages from Mexico, Central, and South America	27	156	282
Languages Other Than Spanish	340	1,827	1,135
American Sign Language	33	324	91

Source: Oregon Judicial Department (2023)

Health Share Oregon

Health Share Oregon is a Coordinated Care Organization (CCO) serving Multnomah, Clackamas and Washington counties. As part of the Oregon Health Plan (Oregon Medicaid), CCOs provide comprehensive health coverage for low-income individuals and families.

According to Health Share Oregon (2023), approximately 15% of Health Share members speak a primary language other than English. This includes around 13,000 members identified as having Limited English Proficient (LEP). In 2022, members with limited in their English proficiency accounted for nearly 40,000 visits to healthcare providers. Additionally, 13% of all member visits required interpretive services to support communication needs (Health Share of Oregon, 2023). The most common primary non-English languages among Health Share members are listed in Table 5.

Table 5: 2023 Percentage of Total Health Share Oregon Members in Multnomah, Clackamas, and Washington Counties with Primary Language Other Than English

Language	Percent of Health Share Members
Spanish	9.8%
Russian	1.3%
Vietnamese	1.1%
Chinese	1.0%
Arabic	0.3%
Somali	0.3%
Other	2.6%

Source: Health Share Oregon (2023)

Synthesis

Data from the American Community Survey (ACS), local school districts, the Oregon Judicial Department and Health Share Oregon collectively illustrate a concentrated and large multilingual population with limited English proficiency within TriMet's service area - particularly in the eastern, central, and western sectors. Across all datasets, Spanish consistently emerges as the most commonly spoken language among individuals with limited English proficiency. Russian, Chinese and

Vietnamese are also frequently reported among the top languages across multiple sources.

According to ACS estimates, there are ten languages within TriMet's service district that meet the U.S. Department of Transportation's Safe Harbor threshold of 1,000 or more individuals with limited English proficiency: Spanish, Vietnamese, Chinese, Russian, Korean, Ukrainian, Arabic, Japanese, Tagalog and Persian (includes Farsi and Dari). While the ACS serves as a foundational data source for identifying and estimating populations with limited English proficiency geographically, it presents limitations in its ability to disaggregate less common languages. This results in the underrepresentation of certain linguistic groups.

In contrast, local data from school districts, courts and healthcare systems provide more granular insight. These sources highlight Somali and Chuukese as among the top languages spoken by English language learner (ELL) students and among the most frequently requested for interpretation services. Despite this, these languages do not meet the ACS Safe Harbor threshold because they are grouped into broader language categories, such as "Amharic, Somali or other Afro-Asiatic languages" or "Ilocano, Samoan, Hawaiian or other Austronesian languages," making it difficult to estimate their populations precisely.

Given the frequency with which Somali and Chuukese appear in local datasets, it is reasonable to infer that these languages have a more significant presence in TriMet's service district than ACS data alone would suggest. As such, they should be considered in language access planning and translation services.

Factor 2

The Frequency with which people with limited English proficiency come into contact with TriMet services.

TriMet maintains frequent contact with people who speak languages other than English through various customer-facing programs and services. The presence of more than 112,630 individuals with limited English proficiency (7.2%) in our service area along with the widespread distribution of Spanish, Vietnamese, Chinese, Russian and Korean-speaking communities among others, indicates regular interaction with multilingual customers across our transit system.

Points of Contact Include:

- TriMet Customer Service Line (503-238-RIDE): Frequent use of over-the-phone interpreters.
- TransitTracker by Phone: A Spanish option is presented first in the menu system.
- In-person Services: Staff frequently engage with customers who speak languages other than English at transit centers, outreach events, fare enforcement interactions and community meetings.
- Website Engagement: Visits to translated webpages and use of online Trip Planners in Spanish and other Safe Harbor languages.
- Community Engagement: TriMet's ongoing partnerships with organizations through our Meaningful Participation services contracts that include community-based organizations such as Latino Network, IRCO and APANO yield consistent interaction with communities that speak languages other than English.

The survey feedback from frontline employees, operators and TriMet's own outreach activities confirm that Spanish-speaking riders have the highest frequency of contact followed by Vietnamese, Chinese and Russian-speaking riders.

Factor 3

The Nature and Importance of TriMet Services to linguistically diverse people's lives.

Public transit plays a critical role in the daily lives of people with limited English proficiency, providing access to:

- Employment
- Education
- Healthcare
- Housing and social services
- Civic participation opportunities

People who speak languages other than English often rely on transit due to lower car ownership rates and affordability concerns. Therefore, ensuring meaningful access to TriMet's services is vital for improving access and opportunity.

Key Programs Critical to Populations with Limited English Proficiency:

- Hop Fastpass® and income-based access to Honored Citizen Reduced Fare Program
- Service alerts and route changes
- Title VI Complaint Process
- Safety and emergency communications
- Transit project planning (e.g., 82nd Avenue Transit Project, TV Highway Project)

TriMet recognizes that providing timely and understandable information to populations who speak languages other than English prevents missed opportunities, inability to access essential services and decreased trust in our agency.

Factor 4

The resources available to the recipient and associated costs.

TriMet continues to invest in infrastructure, staff and partnerships to support meaningful language access. While cost is a consideration, we recognize that ensuring compliance with Title IV and improving access for riders with limited English proficiency are agency-wide priorities that require sustained investments. We have demonstrated an ongoing commitment through hiring of staff and creating a sustainable Language Access Program infrastructure. We have dedicated resources across several departments to implement the Language Access Program. Below are examples of the roles and responsibilities departments have to ensure meaningful access for people who speak languages other than English. Additionally, we contract with community-based organizations, vendors and other service providers to meet the language needs of riders.

- The Language Access Program Manager leads strategic planning, compliance and agency- wide coordination and consultation.
- The Community Engagement Team supports community-specific outreach and maintains ongoing relationships with over 40 community-based organizations.
- Creative Services, Customer Experience and Communications Departments produce multilingual materials and oversee translation workflows.
- Operations, Training and Marketing teams support language access through service design, staff education and advertisements.
- Bilingual staff includes speakers of Spanish, Vietnamese, Mandarin, Cantonese, Russian and Ukrainian provide valuable contributions.

Technology and Vendor Support

We utilize a tiered approach to translation that maximizes quality while managing costs.

- Professional translation vendors are contracted for highly visible, safety critical and community-responsive materials.
- Over-the-phone interpretation services support over 240 languages via the customer service line.
- In-person interpretation is available for public meetings and community events when requested or anticipated based on community demographics and geographical location of projects.

- Multilingual channel cards and signage on board vehicles and at transit centers
- A centralized language request tracking system is under development to improve efficiency and identify cost-saving opportunities.

Budget Considerations

We have allocated budgets in programs across multiple departments to support language access including:

- Translation and interpretation services
- Development of multilingual digital tools and signage
- Development of training for respectful and community-responsive service delivery
- Technology solutions for real-time service alerts and multilingual customer support

Balancing Cost and Compliance

We will continue to evaluate language needs using the Four Factor Analysis framework and adjusting our strategies as needed to reflect the trends in multilingual communities. By prioritizing translation of vital documents for Safe Harbor language populations, we strive to provide cost-effective and meaningful access.

To provide transparency and compliance, we are also developing:

- A self-assessment and reporting tool aligned with Federal Transit Administration's Title VI requirements.
- A quarterly review process for language access activities, quality and accuracy of translated information.
- Feedback loops through community partners and multilingual rider surveys.

Conclusion

Based on the Four Factor Analysis using current population data we confirm the continued need to:

- Prioritize Spanish, Vietnamese, Chinese, Russian and Korean across all services and materials.
- Monitor and evaluate contact with emerging language groups who speak languages other than English.
- Expand community partnerships to engage linguistically diverse riders.
- Ensure consistent training for staff, accurate translations and visibility of language assistance services.

This analysis reaffirms that our language access plan must remain innovative and responsive to the evolving demographics of the region. Regular updates and monitoring will be essential to uphold meaningful access for riders across all of our programs and services.

Attachment G: Subrecipient Title VI Guide

The Subrecipient's Guide to Title VI Compliance

Revision Table		
Version	Description	Date
1	Created	08/02/13
1	Legal Review	10/15/13
2	Updated by E. Turney	04/22/16
2	Reviewed by N. Young	04/27/16
2	Legal Review	05/12/16

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INTRODUCTION

This Subrecipient's Guide to Title VI Compliance ("Guide") addresses discrimination based on Title VI of the 1964 Civil Rights Act, Federal Transit Laws, Title 49, U.S. Code, Chapter 53, 49 CFR§ 1.51, 49 CFR Part 21 and 28 CFR §42.401.

Entities receiving federal financial assistance from the U.S. Department of Transportation (DOT), , either directly from a DOT agency such as the Federal Transit Administration (FTA) or indirectly from a pass-through agency, such as TriMet or the Oregon Department of Transportation (ODOT) must not discriminate based on race, color or national origin in their programs or activities. .

The intent of Title VI is to remove barriers and conditions that prevent minority and low income persons, including limited English proficiency (LEP) persons, from receiving access to, participation in and benefits from federally-assisted programs, services and activities.

Title VI covers all the operations of covered entities without regard to whether specific portions of the covered program or activity are federally funded. The term "program or activity" means all of the operations of a department, agency, special purpose district or government; or the entity of such State or local government that distributes such assistance and each such department or agency to which the assistance is extended, in the case of assistance to a State or local government.

While this Guide sets forth general requirements identified in FTA Circular 4702.1B, it is intended to be a summary of those general requirements and not exhaustive. Subrecipients are responsible for reviewing and ensuring that they are in compliance with all applicable Title VI requirements.

TRIMET'S RESPONSIBILITIES

As a Designated, Direct and Primary Recipient (extends federal financial assistance to a subrecipient), TriMet receives, manages and passes through federal funds to eligible subrecipients and therefore, is responsible for monitoring and documenting compliance with Title VI of the subrecipient.

However, if the same subrecipient also receives direct funding from FTA as well as pass through funds from TriMet AND has a signed agreement in place with TriMet, than TriMet does not have any responsibility to monitor the Title VI Program of the subrecipient. It is the responsibility of the subrecipient to comply with and submit Title VI reports directly to FTA.

Monitoring of subrecipients will be primarily performed by the Grants Administrator but with technical assistance from TriMet's Diversity and Transit Equity Department which has chief responsibility for administering and monitoring TriMet's Title VI requirements.

It is important to note that if a subrecipient is not in compliance with Title VI in any area of the program, then TriMet is also not in compliance. As such, TriMet will continue to work with subrecipients to ensure compliance is met for all parties. This includes monitoring subrecipient activities, conducting on-site audits, collecting and reviewing documents on a designated schedule, providing data to FTA when requested and offering assistance. In the event FTA determines that a recipient such as TriMet is noncompliant with applicable Title VI requirements following a compliance review or after FTA completes an investigation in response to a Title VI complaint, FTA will attempt to resolve noncompliance informally. When FTA and a recipient cannot agree on a final remedial action plan and the recipient continues to be in noncompliance with regulations, in accordance with 49 CFR Section 21.13, FTA may suspend, terminate or refuse to grant or continue federal financial assistance to the recipient and therefore to affected subrecipients. This will generally occur when all means of informal resolutions have failed.

SUBRECIPIENT'S RESPONSIBILITIES

FTA requires that all subrecipients have a written Title VI Program that is approved by their board of directors or appropriate governing entity or official(s) responsible for policy decisions. Except for new applicants, subrecipient program documentation must be submitted to TriMet by the end of April each year. Contents of each Title VI Program (see *Appendix A*) which is required by all subrecipients, must include the following information:

- A. **Title VI Public Notice**, including a list of locations where the notice is posted. Sample notice is included as *Appendix B*.
- B. **Title VI Complaint Procedure** (instructions to the public regarding how to file a Title VI discrimination complaint) and **Title VI Complaint Form**. Sample complaint procedures and compliant form are included as *Appendix C and D*, respectively.
- C. **A list of transit-related Title VI investigations, complaints and lawsuits**. Example of how to report this information is included as *Appendix E*.
- D. **Public Participation Plan**, including information about outreach methods to engage minority and Limited English Proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission.
- E. **Language Assistance Plan** for providing language assistance to persons with Limited English Proficiency (LEP), based on the DOT LEP Guidance.
- F. A **table** depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race and a description of the process the agency uses to encourage the participation of minorities on such committees. Sample table is included as *Appendix F*.
- G. **Narrative or description** of how the subrecipient monitors its subrecipients/contractors for compliance with Title VI and a schedule of subrecipient Title VI program submissions.
- H. **Title VI Equity Analysis** if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.

If subrecipient provides fixed route service, the Title VI Program must also include:

- I. **Fixed Route Service Standards and Fixed Route Service Policies.** Sample standards and policies are included as *Appendix G and H*, respectively.

If subrecipient is a transit provider that operates 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people, the Title VI Program must also include:

- J. **Demographic and service profile maps and charts.** Sample maps and charts are included as *Appendix I*.
- K. **Demographic ridership and travel patterns**, collected by surveys.
- L. **Results of their monitoring program and report**, including evidence that the board or other governing entity or official(s) considered, was aware of the results and approved the analysis. Example on how to report this information is included as *Appendix J*.
- M. **Description of the public engagement process** for setting the “major service change policy, “disparate impact policy and disproportionate burden policy.
- N. **Results of service and/or fare equity analysis** conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of and approved the results of the analysis. Example of analysis is provided as *Appendix K*.

TITLE VI PROGRAM DETAILS

The following sections describe in more detail the individual components of the Title VI Program. Use of the word “recipient” hereafter, refers to “subrecipient” unless indicated otherwise.

Public Notice

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient’s obligations under DOT’s Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

At a minimum, recipients must post the notice on the agency’s website and in public areas of the agency’s office(s), including the reception desk, meeting rooms, etc. Many agencies display their Title VI Notices in transit facilities (e.g., headquarters, transit shelters and stations, etc.), and on transit vehicles (e.g., buses, rail cars, etc.). Notice should also include the following statement “If information is needed in another language, then contact [phone number].”

Notices shall include:

- Statement that the agency operates programs w/out regard to race, color or national origin.
- Description of procedures the public should follow in order to request additional information on recipient's Title VI obligations.

- Description of the procedures the public should follow in order to file a Title VI discrimination complaint against the recipient.

Recipient should include a list of locations where the notice is posted. If any of the Limited English Proficient (LEP) populations in your service area meet the Safe Harbor threshold (see Chapter III), then the Notice should be provided in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold.

Best practice guidance also suggests posting or printing in other areas such as:

- Vehicles (buses, vans, rail, cars)
- Transit shelters and stations
- Ride guides
- Bus schedules
- Posters
- Comment cards
- Flyers at stations.

Public Notice Q&A

Q1: Can the notice include other protected classes (religion, age, gender, non-disability, etc.)?

A1: Yes, as long as race, color and national origin are included.

Q2: Our agency has a non-discrimination policy, does this cover Title VI?

A2: It depends. The policy, procedures, and/or program must specifically prohibit discrimination based on race, color and national origin as indicated in Title VI protections. Furthermore, many nondiscrimination policies are personnel related and a Title VI the program must be for the public to use.

Complaint Procedure

Recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and makes their procedures for filing a complaint available to members of the public.

If any of the Limited English Proficient (LEP) populations in your service area meet the Safe Harbor threshold, then the complaint procedure should be provided in English and in any other language(s) spoken by LEP populations.

At a minimum, the complaint procedure should include a notice—“If information is needed in another language, then contact [phone number]”—should be stated in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold.

Complaint Procedure Q&A

- Q: Our agency has a discrimination complaint procedure; can the same procedure be used for Title VI?
- A: Yes. In the section that identifies the specific issues that are covered by the procedure race, color, and national origin must be included.

Complaint Form

Recipients must also develop a Title VI Complaint Form and the Form and procedure for filing a complaint shall be available on the recipient’s website.

The Title VI Complaint Form shall specify the three classes protected by Title VI: race, color and national origin. The Form shall allow the complainant to select one or more of those protected classes as the basis for discrimination.

If any of the Limited English Proficient (LEP) populations in your service area meet the Safe Harbor threshold, then the procedure should be provided in English *and* in any other language(s) spoken by LEP populations.

Complaint Form Q&A

- Q: Our agency has a discrimination complaint form; can the same form be used for Title VI?
- A: Yes, but in the area where the protected classes(es) are identified, there must be an area to identify race, color or national origin. Additionally, the same form can be used if the alleged discrimination covers multiple protected classes.

Transit-related Title VI Investigations, Complaints and Lawsuit List

FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color or national origin: active investigations conducted by entities other than FTA, lawsuits and complaints naming the recipient.

List shall include the date of investigation, lawsuit, or when the complaint was filed; summary of the allegation(s); status; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit or complaint. List should cover the period up to the last submission.

Include only those complaints that pertain to allegations of discrimination on the basis of race, color and/or national origin in transit related activities and programs and that pertain to the subrecipient submitting the report, not necessarily the larger agency/department of which the recipient is a part.

Public Participation Plan

The content and considerations of Title VI, the Executive Order on LEP and the DOT LEP Guidance shall be integrated into each recipient's established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities).

Recipients have wide latitude to determine how, when and how often specific public participation activities should take place and which specific measures are most appropriate. Recipients should make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration and the resources available. Efforts to involve minority and LEP populations in public participation activities can include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical or other barriers that may prevent minority and LEP persons from effectively participating in a recipient's decision-making process. FTA has developed a Circular, 4703.1, "Environmental Justice Policy Guidance for Federal Transit Administration Recipients," that includes many examples of effective strategies for engaging minority and low-income populations. FTA encourages recipients to review that Circular for ideas when developing their public engagement strategy.

Recipients engaged in planning and other decision-making activities at the local level should consider the principles embodied in the planning regulations and develop and use a documented public participation plan or process that provides adequate notice of public participation activities, as well as early and continuous opportunities for public review and comment at key decision points.

Public participation plan includes an outreach plan to engage minority and Limited English Proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission.

Public Participation Plan Q&A

- Q1: Our agency provides transportation services for clients that are referred by social service agencies. Do we need a public participation plan?
- A1: Yes, but the plan can be as simple as contacting social service agencies and informing them of your program.

- Q2: Our transportation services start when TriMet services stop to provide transportation from downtown to local area businesses. What would our plan look like?
- A2: The plan could include outreach to businesses in your area to provide transportation to employees.

Language Assistance Plan

Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

Recipients are encouraged to review DOT's LEP Guidance on self-assessment, Language Access Assessment & Planning Tool for Federally Conducted and Federally Assisted Programs and other materials available at www.lep.gov.

At a minimum, the Language Assistance Plan (LEP) must include the following:

- Results of the Four Factor Analysis, including description of the LEP population(s) served.
- Description of how the recipient provides language assistance services by language.
- Description of how recipient provides notice to LEP persons about the availability of language assistance.
- Description of how the recipient monitors, evaluates and updates the language access plan.
- Description of how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.

Language Assistance Plan Q&A

- Q1: How do I find out what LEP populations we serve?
- A1: The Census provides information online at the following link:
<http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>. If you need additional demographic information, TriMet can assist you.
- Q2: At what point does the agency provide LEP services to populations in our service area?
- A2: If specific LEP populations exceed 5% or 1,000 individuals, the agency must provide written translation services.

Minority Representation Table

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must

provide a table depicting the membership of those committees broken down by race and a description of efforts made to encourage the participation of minorities on such committees.

Recipients must also have a description of efforts made to encourage the participation of minorities on such committees/councils.

Minority Representation Table Q&A

- Q: We have numerous boards and committees. Do we need to collect this data for each?
- A: The table is only required for transportation related boards and committees.

Assistance and Monitoring of Subrecipients

Title 49 CFR Section 21.9(b) states that if “a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part.” If funding was passed-through to another subrecipient, recipient shall include a narrative/description of efforts the recipient uses to ensure subrecipients are complying, as well as a schedule of subrecipient program submissions. Primary recipients must monitor their subrecipients for compliance with the regulations. Importantly, if a subrecipient is not in compliance with Title VI requirements, then the primary recipient is also not in compliance.

Note - If funding was given a contractor, subrecipient is responsible for ensuring that contractors are following and complying with Title VI. Contractors, however, are not required to prepare/submit Title VI Programs.

Equity Analysis

If a recipient has constructed a facility (e.g., storage, maintenance, operation center), recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

Recipient shall engage in outreach to persons potentially impacted by the site of facilities. Title VI equity analysis must compare the equity impacts of various siting alternatives and the analysis must occur before the selection of the preferred site.

When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.

If the recipient determines that the location will result in a disparate impact on the basis of race, color or national origin, the recipient may only locate the project in the location if there is a

substantial legitimate justification for locating the facility there and evidence that there are no alternative locations.

Equity Analysis Q&A

- Q1: Only part of the facility is being funded with FTA funds. Do we need to perform an equity analysis?
- A1: Yes if any FTA funds are used in the construction of storage facilities, maintenance facilities or operations centers. An equity analysis must be performed prior to site selection.
- Q2: Site planning was conducted years before we knew we would be awarded FTA funds for a portion of the operation center construction. How would we perform an equity analysis if we are already starting construction?
- A2: FTA Circular 4702.1B was in effect October 2012 and the requirement did not exist in previous FTA circulars; as a result, the equity analysis is required for projects that began after October 2012. If the planning phase started after October 2012, please contact TriMet so we can help you.

Fixed Route Service Standards

All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide. Fixed route modes of service include, but are not limited to: local bus, express bus, commuter bus, bus rapid transit, light rail, subway, commuter rail or passenger ferry.

Standards must address how service is distributed across the transit system and ensure that the manner of the distribution affords users access to these assets.

System-wide services standards differ from standards set by the APTA Standards Development Program and other Standards Development Organizations (SDOs) as they will be set by the individual transit providers and apply agency-wide rather than industry-wide.

Providers of fixed route public transportation shall also adopt system-wide service policies to ensure service design and operation practices do not result in discrimination on the basis of race, color or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

Service standards include the following components:

- *Vehicle load for each mode* - Expressed as the ratio of passengers to the total number of seats on a vehicle. Vehicle load standard is generally expressed in terms of peak and off-peak times. Transit providers that operate multiple modes of transit must describe the

specific vehicle load standards for peak and off-peak times for each mode of fixed route transit service as the standard may differ by mode.

- *Vehicle headway for each mode* - The amount of time between 2 vehicles traveling in the same direction on a given line or combination of lines. Vehicle headways are measured in minutes and service frequency is measured in vehicles per hour. A vehicle headway standard is generally expressed for peak and off-peak service as an increment of time. Headway standards are typically related to vehicle load.
- *On-time performance for each mode* - Measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." On-time performance can be measured against route origins and destinations; or against origins and destinations as well as specified time points along the route. An acceptable level of performance must be defined.
- *Service availability for each mode* - General measure of the distribution of routes within a transit provider's service area.

Fixed Route Service Policies

Policies must address how service is distributed across the transit system and ensure that the manner of the distribution affords users access to these assets. FTA requires all fixed route transit providers to develop a policy for each of the following service indicators:

- *Distribution of transit amenities for each mode* - Fixed route transit providers must set a policy to ensure equitable distribution of transit amenities (items of comfort, convenience and safety) across the system and address how these amenities are distributed and the manner of distribution determines whether transit users have equal access to amenities. Transit providers shall submit their siting policy where the definition of amenities includes but isn't limited to:
 - Seating
 - bus & rail shelters and rail platform canopies
 - provision of information, including: printed signs, system maps, route maps and schedules
 - digital equipment such as next vehicle arrival time signs along bus routes and at fixed guide-way stations
 - escalators
 - elevators
 - waste receptacles
- *Vehicle assignment for each mode* - Process by which transit vehicles are placed into service in depots and on routes throughout the transit providers system. Policies may be based on the age of the vehicle, where age would be a proxy for condition or the type of vehicle. Transit providers deploying vehicles equipped with technology designed to reduce emissions could choose to set a policy for how these vehicles will be deployed throughout the service area.

Demographic and Service Profile Maps and Charts and Travel Patterns

Transit providers are to prepare data regarding demographic and service profile maps and charts as well as customer demographics and travel patterns. Providers shall collect and analyze racial

and ethnic data in order to determine the extent to which members of minority groups are beneficiaries of programs receiving federal financial assistance from FTA. Data shall include:

- *Demographic and Service Profile Maps and Charts* – after each decennial census and prior to proposed service reductions or eliminations.
- *Demographic Ridership and Travel Patterns* – collect information on the race, color, national origin, English proficiency, language spoken at home, household income and travel patterns of their riders using customer surveys. Demographic information shall also be collected on fare usage by fare type amongst minority and low income users, in order to assist with fare equity analysis.

Results of the Monitoring Program and Report

Transit providers are to monitor performance of their transit system relative to their system-wide service standards and policies (i.e., vehicle load & assignment, amenities, etc) using the following methods:

- Providers shall use the minority transit route definition to implement this monitoring program. Providers shall select a sample of minority and non-minority routes from all modes of service provided. Sample shall include routes that provide services to predominately minority areas and non-minority areas.
- Transit providers shall assess the performance of each minority and non-minority route in the sample for each of the transit provider's service standards and service policies.
- Transit providers shall compare the transit service observed in the assessment to the transit provider's established service policies and standards.
- For cases in which the observed service for any route exceeds or fails to meet the standard or policy, depending on the metric measured, the transit provider shall analyze why the discrepancies exist and take steps to reduce the potential effects.
- Transit providers shall evaluate their transit amenities policy to ensure amenities are being distributed throughout the transit system in an equitable manner.
- Transit providers shall develop a policy or procedure to determine whether disparate impacts exist on the basis of race, color or national origin and apply that policy or procedure to the results of the monitoring activities.
- Transit providers shall brief and obtain approval from the transit providers' policy-making officials, generally the board of directors or appropriate governing entity responsible for policy decisions regarding the results of the monitoring program.
- Submit the results of the monitoring program as well as documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the board's or governing entity or official's consideration, awareness and approval of the monitoring results to FTA every three years as part of the Title VI Program. See Appendix J for an example of how to report this information.

Results of Service and/or Fare Equity Analysis

The purpose of conducting an equity analysis prior to implementing service and/or fare changes is to determine whether the planned changes will have a disparate impact on the basis of race, color or national origin.

FTA encourages providers to contact their FTA Regional Civil Rights Officer for technical assistance when service equity analysis is necessary.

Are these definitions included to interpret the sample documents attached as Appendices?

- a. Applicant means a person or entity that submits an application, request or plan required to be approved by the FTA Administrator or by a primary recipient, as a condition of eligibility for financial assistance from FTA and “application” means such an application, request, or plan.
- b. Demand response system is any non-fixed route system of transporting individuals that require advanced scheduling including services provided by public entities, non-profits and private providers. An advance request for service is a key characteristic of demand response service.
- c. Designated recipient means an entity designated, in accordance with the planning process under sections 5303 and 5304, by the Governor of a State, responsible local officials and publicly owned operators of public transportation, to receive and apportion amounts under section 5336 to urbanized areas of 200,000 or more in population; or a State or regional authority, if the authority is responsible under the laws of a State for a capital project and for financing and directly providing public transportation.
- d. Direct recipient means an entity that receives funding directly from FTA. For purposes of this Circular, a direct recipient is distinguished from a primary recipient in that a direct recipient does not extend financial assistance to subrecipients, whereas a primary recipient does.
- e. Discrimination refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient or contractor that results in disparate treatment, disparate impact or perpetuating the effects of prior discrimination based on race, color or national origin.
- f. Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color or national origin, where the recipient’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color or national origin.
- g. Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income population’s more than non low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.
- h. Disparate treatment refers to actions that result in circumstances where similarly

situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color or national origin.

- i. Fixed guideway means a public transportation facility, using and occupying a separate right-of-way for the exclusive use of public transportation; using rail; using a fixed catenary system; for a passenger ferry system; or for a bus rapid transit system.
- j. Fixed route refers to public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.
- k. Federal financial assistance refers to:
 - grants and loans of Federal funds.
 - the grant or donation of Federal property and interests in property.
 - the detail of Federal personnel.
 - the sale and lease of and the permission to use (on other than a casual or transient basis) Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient.
 - any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.
- l. Limited English Proficient (LEP) persons refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well or not at all.
- m. Low-income person means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines.

Recipients are encouraged to use a locally developed threshold, such as the definition found in 49 U.S.C. 5302 as amended by MAP-21: “refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section) for a family of the size involved” or another threshold, provided that the threshold is at least as inclusive as the HHS poverty guidelines.

- n. Low-income population refers to any readily identifiable group of low-income persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.
- o. Metropolitan Planning Organization (MPO) means the policy board of an organization created and designated to carry out the metropolitan transportation planning process.

- p. Metropolitan Transportation Plan (MTP) means the official multimodal transportation plan addressing no less than a 20-year planning horizon that is developed, adopted and updated by the MPO through the metropolitan transportation planning process.
- q. Minority persons include the following:
- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America) and who maintain tribal affiliation or community attachment.
 - Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand and Vietnam.
 - Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
 - Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American or other Spanish culture or origin, regardless of race.
 - Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands.
- r. Minority population means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy or activity.
- s. Minority transit route means a route that has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area. A recipient may supplement this service area data with route-specific ridership data in cases where ridership does not reflect the characteristics of the census block, block group or traffic analysis zone.
- t. National origin means the particular nation in which a person was born, or where the person's parents or ancestors were born.
- u. Noncompliance refers to an FTA determination that the recipient is not in compliance with the DOT Title VI regulations and has engaged in activities that have had the purpose or effect of denying persons the benefits of, excluding from participation in, or subjecting persons to discrimination in the recipient's program or activity on the basis of race, color or national origin.
- v. Non-profit organization is a corporation or association determined by the Secretary of the Treasury to be an organization described by 26 U.S.C. 501(c) which is exempt from taxation under 26 U.S.C. 501(a) or one which has been determined under State law to be

a non-profit and for which the designated State agency has received documentation certifying the status of the non-profit organization.

- w. Predominantly minority area means a geographic area, such as a neighborhood, Census tract, block or block group or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.
- x. Primary recipient means any FTA recipient that extends Federal financial assistance to a subrecipient.
- y. Provider of fixed route public transportation (or "transit provider") means any entity that operates public transportation service and includes: States, local, regional, public and private entities. This term is used in place of "recipient" in chapter IV and is inclusive of direct recipients, primary recipients, designated recipients and subrecipients that provide fixed route public transportation service.
- z. Public transportation means regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability or low income; and does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments or intra-terminal or intra-facility shuttle services. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers and vans. Public transportation can be either fixed route or demand response service.
- aa. Recipient as referenced in this Circular, means any public or private entity that receives Federal financial assistance whether directly from FTA or indirectly through a primary recipient. Term includes: subrecipients, direct recipients, designated recipients and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.
- bb. Secretary means the Secretary of the U.S. Department of Transportation.
- cc. Service area refers either to the geographic area in which a transit agency is authorized by its charter to provide service to the public or to the planning area of a State Department of Transportation or Metropolitan Planning Organization.
- dd. Service standard/policy means an established service performance measure or policy used by a transit provider or other recipient as a means to plan or distribute services and benefits within its service area.
- ee. Statewide Transportation Improvement Program (STIP) means a statewide prioritized listing/program of transportation projects covering a period of four years that is consistent with the long-range statewide transportation plan, metropolitan transportation plans and TIPs and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.

- ff. Subrecipient means an entity that receives Federal financial assistance from FTA through a primary recipient.
- gg. Title VI Program refers to a document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent.
- hh. Transportation Improvement Program (TIP) means a prioritized listing/program of transportation projects covering a period of four years that is developed and formally adopted by a MPO as part of the metropolitan transportation planning process, consistent with the metropolitan transportation plan and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.
- ii. Transportation Management Area (TMA) means an urbanized area with a population over 200,000 as defined by the Bureau of the Census and designated by the Secretary of Transportation or any additional area where TMA designation is requested by the Governor and the MPO and designated by the Secretary of Transportation.

INTERNET RESOURCES

FTA Circular 4702.1B (October 1, 2012)

http://www.fta.dot.gov/legislation_law/12349_14792.html

DOT LEP Guidance

http://www.justice.gov/crt/lep/guidance/guidance_Fed_Guidance.html#DOT

TriMet Civil Rights <http://www.trimet.org/about/titlevi.htm>

TRIMET CONTACT INFORMATION

Send your Title VI materials and questions to:

Erika Turney, CIA, Grants Administrator
1800 SW First Ave, Suite 300
Portland, OR 97201
turneye@trimet.org
(503) 962-4832

SAMPLE DOCUMENTS

The samples listed below are provided from FTA for the purpose of guidance only. Contact TriMet for any questions or assistance with your agencies documents.

Appendix A – Title VI Program Checklist

General Requirements (Chapter III)

All recipients must submit:

- Title VI Notice to the Public, including a list of locations where the notice is posted.
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint).
- Title VI Complaint Form.
- List of transit-related Title VI investigations, complaints and lawsuits.
- Public Participation Plan, including information about outreach methods to engage minority and Limited English Proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission.
- Language Assistance Plan for providing language assistance to persons with Limited English Proficiency (LEP) based on the DOT LEP Guidance.
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race and a description of the process the agency uses to encourage the participation of minorities on such committees.
- Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI and a schedule of subrecipient Title VI Program submissions.
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility or operation center.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in chapters IV, V and VI depending on whether the recipient is a transit provider, a State or a planning entity (see below).

Requirements of Transit Providers (Chapter IV)

All Fixed Route Transit Providers must submit:

- All requirements set out in Chapter III (General Requirements)
- Service standards.
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
- Service policies

- Transit Amenities for each mode
- Vehicle Assignment for each mode

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

- Demographic and service profile maps and charts.
- Demographic ridership and travel patterns collected by surveys.
- Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results and approved the analysis.
- A description of the public engagement process for setting the “major service change policy,” disparate impact policy and disproportionate burden policy.
- Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis.

Appendix B – Title VI Notice to the Public (General Requirement)

Background

A Title VI Notice to the Public must be displayed to inform a recipient's customers of their rights under Title VI. At a minimum, recipients must post the notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Many agencies display their Title VI Notices in transit facilities (e.g., headquarters, transit shelters and stations, etc.), and on transit vehicles (e.g., buses, rail cars, etc.). The Title VI Notice is a vital document. If any of the Limited English Proficient (LEP) populations in your service area meet the Safe Harbor threshold (see Chapter III), then the Notice should be provided in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold. At a minimum, this statement in the Notice—"If information is needed in another language, then contact [phone number]"—should be stated in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold.

SAMPLE Title VI Notification to the Public

Notifying the Public of Rights Under Title VI

THE CITY OF USA

- The City of USA operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of USA.
- For more information on the City of USA's civil rights program, and the procedures to file a complaint, contact 800-555-1212, (TTY 800-555-1111); email title.vi.complaint@city.ca.us; or visit our administrative office at 1234 Center Street, City of USA, State 11111. For more information, visit www.city.ca.us
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact 800-555-1212.

MAKE SURE THE SENTENCE ABOVE IS ALSO PROVIDED IN ANY LANGUAGE(S)
SPOKEN BY LEP POPULATIONS THAT MEET THE SAFE HARBOR THRESHOLD

Appendix C – Title VI Complaint Procedure (General Requirement)

Background

Recipients' Title VI Programs must include a copy of the agency's Title VI complaint procedure. The complaint procedure and complaint form shall be available on the recipient's website. The Title VI Complaint Procedure is a vital document. If any of the Limited English Proficient (LEP) populations in your service area meet the Safe Harbor threshold (see Chapter III), then the complaint procedure should be provided in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold. At a minimum, the complaint procedure should include a notice—"If information is needed in another language, then contact [phone number]"—should be stated in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold.

SAMPLE Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color or national origin by the City of USA Transit Authority (hereinafter referred to as "the Authority") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The City of USA Transit Authority investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete. Once the complaint is received, the Authority will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Authority has XX days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has XX business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within XX business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has XX days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Appendix D – Sample Title VI Compliant Form (General Requirement)

Background

Recipients must create and make available a Title VI Complaint Form for use by customers who wish to file a Title VI complaint. The complaint form shall be available on the recipient's website. A recipient's Title VI Complaint Form shall specify the three classes protected by Title VI—race, color, and national origin—and allow the complainant to select one or more of those protected classes as the basis/bases for discrimination. The Title VI Complaint Form is a vital document. If any of the Limited English Proficient (LEP) populations in your service area meet the Safe Harbor threshold (see Chapter III), then the procedure should be provided in English *and* in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold.

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply): <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin Date of Alleged Discrimination (Month, Day, Year): Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information				

of any witnesses. If more space is needed, please use the back of this form.

Section IV

Have you previously filed a Title VI complaint with this agency?

Yes

No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

☐ Yes

☐ No

If yes, check all that apply:

☐ Federal Agency: _____

☐ Federal Court _____

☐ State Court _____

☐ State Agency _____

☐ Local Agency _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section VI

Name of agency complaint is against:

Contact person:

Title:

Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form
to: City of USA Title VI Coordinator
1234 Center Street
City of USA, State 11111

Appendix E – List of Transit-Related Title VI Investigations, Complaints and Lawsuits (General Requirement)

Background

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color or national origin:

Active investigations conducted by FTA and entities other than FTA

Lawsuits

Complaints naming the recipient

This list shall include the date that the transit-related Title VI investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.

SAMPLE List of Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Appendix F – Table Depicting Minority Representation on Committees and Councils Selected by the Recipient (General Requirement)

Background

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the membership of those committees broken down by race, and a description of efforts made to encourage the participation of minorities on such committees.

SAMPLE Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American
Population	46%	28%	14%	8%	4%
Access Committee	60%	23%	10%	7%	0%
Citizens Advisory Council	40%	25%	20%	10%	5%
Bicycle Pedestrian Committee	45%	30%	15%	5%	5%

Appendix G – Service Standards (Requirement for all Fixed Route Transit Providers)

Background

FTA requires all fixed route transit providers of public transportation to develop *quantitative* standards for the following indicators. Individual public transportation providers will set these standards; therefore, these standards will apply to each individual agency rather than across the entire transit industry.

- *Vehicle load for each mode:* Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point. For example, on a 40- seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. Transit providers can specify vehicle loads for peak vs. off-peak times, and for different modes of transit.
- *Vehicle headways for each mode:* The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.
- *On-time performance for each mode:* A measure of runs completed as scheduled.
- *Service availability for each mode:* A general measure of the distribution of routes within an agency's service area.

SAMPLE STANDARDS

SAMPLE Vehicle Load Standards

1. *Expressed in writing*

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 30 passengers for a 15' mini-bus, 51 passengers for low-floor 40-foot buses, 60 passengers for standard 40-foot buses, and 133 passengers on a light rail car.

2. *Expressed in tabular format*

Vehicle Type	Average Passenger Capacities			Maximum Load Factor
	Seated	Standing	Total	
15' Mini-Bus	28	2	30	1.1
40' Low Floor Bus	39	12	51	1.3
40' Standard Bus	43	17	60	1.4
Light Rail Vehicle	64	69	133	2.1

SAMPLE Vehicle Headway Standards

1. Expressed in writing

Service operates on regional trunk lines every 15 minutes or better from early morning to late in the evening, seven days a week. On weekdays, 15 minute or better service should begin no later than 6:00 a.m. and continue until 10:30 p.m. On weekends, 15 minute or better service should begin by 8:00 a.m. and continue until 10:30 p.m.

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the *Regional Transportation Plan*, relationship to major transportation developments, land use connectivity, and transportation demand management.

2. Expressed in tabular format

POLICY HEADWAYS AND PERIODS OF OPERATION

WEEKDAY	Peak	Base	Evening	Night
Regional Trunk	10	15	15	30
Urban Radial	15	15	30	60
Cross-Town	15	15	30	--
Secondary Radial	30	30	60	--
Feeder	30	30	60	--
Peak Express	30	--	--	--
Employer Feeder	60	--	--	--

** Peak: 7-9 am and 4-6 pm; Base 9am - 4pm; Evening: 6-9:30 pm; Night: 9:30pm- Midnight;*

"--" means no service is provided during that time period.

SATURDAY	Day	Evening	Night
Regional Trunk	15	30	30
Urban Radial	30	60	--
Cross-Town	15	30	--
Secondary Radial	60	60	--
Feeder	60	60	--
Peak Express	--	--	--
Employer Feeder	--	--	--

** Day 7am - 6pm; Evening: 6-9:30 pm; Night: 9:30pm – Midnight; "--" means no service is provided during that time period.*

SUNDAY	Day	Evening	Night
Regional Trunk	30	60	--
Urban Radial	30	60	--
Cross-Town	30	--	--
Secondary Radial	--	--	--
Feeder	--	--	--
Peak Express	--	--	--
Employer Feeder	--	--	--

**Day 7am - 6pm; Evening: 6-9:30 pm; Night: 9:30pm-Midnight; "--" means no service is provided during that time period.*

SAMPLE On-Time Performance Standards Expressed In Writing

- Sample 1:
 - Ninety-five (95) percent of the City of USA's transit vehicles will complete their established runs no more than 5 minutes early or late in comparison to the established schedule/published timetables.
- Sample 2:
 - A vehicle is considered on time if it departs a scheduled time point no more than 1 minute early and no more than 5 minutes late. The City of USA's on-time performance objective is 90% or greater. The City of USA continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

SAMPLE Service Availability Standards Expressed in writing

The City of USA will distribute transit service so that 90% of all residents in the service area are within a ¼ mile walk of bus service or within a ½ mile walk of rail service.

AND/OR

Local bus stops will be not more than 3 blocks apart. Express bus stops will be one-half to three-quarters of a mile apart.

Appendix H – Service Policies (Requirement for all Fixed Route Transit Providers)

Background

FTA requires that all providers of fixed route public transportation develop qualitative policies for the following procedures. These policies are to be set by individual transit providers; therefore, these policies will apply to individual agencies rather than across the entire transit industry.

- Vehicle Assignment
- Transit Amenities

Policies

SAMPLE Vehicle Assignment Policy Expressed In Writing

Vehicles will be assigned to the South, North, and East depots such that the average age of the fleet serving each depot does not exceed “x” years. Low-floor buses are deployed on frequent service and other high-ridership lines, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet.

Low-floor buses are also equipped with air conditioning and automated stop announcement systems.

All rail cars are equipped with air conditioning, and high-floor rail cars are always paired with a low-floor car to provide accessibility.

Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 30-foot buses rather than the 40-foot buses.

Some routes requiring tight turns on narrow streets are operated with 30-foot rather than 40-foot buses.

SAMPLE Transit Amenities Policy Expressed In Writing

Installation of transit amenities along bus and rail routes are based on the number of passenger boardings at stops and stations along those routes.

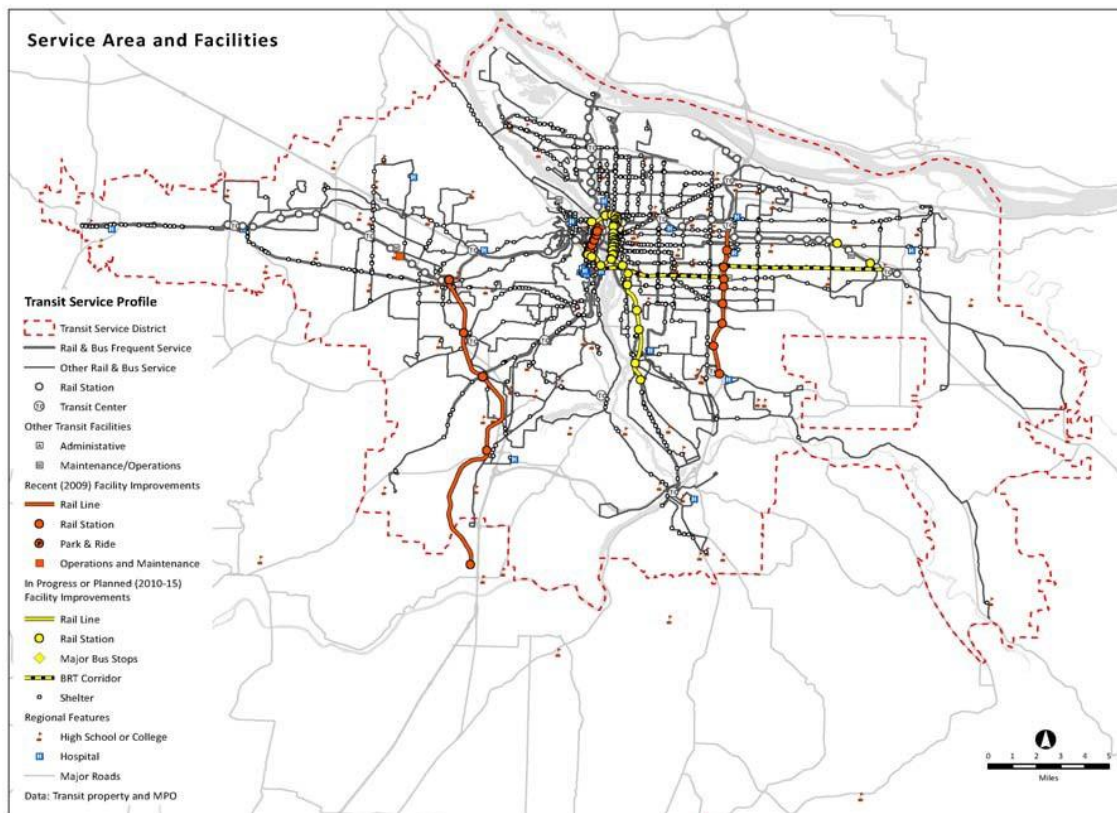
Appendix I – Demographic Profile and Travel Patterns (Requirement for Transit Providers that Operate 50 or More Fixed Route Vehicles in Peak Service and are located in Urbanized Areas (UZA) of 200,000 or More People or that Otherwise Meet the Threshold Defined in Chapter IV)

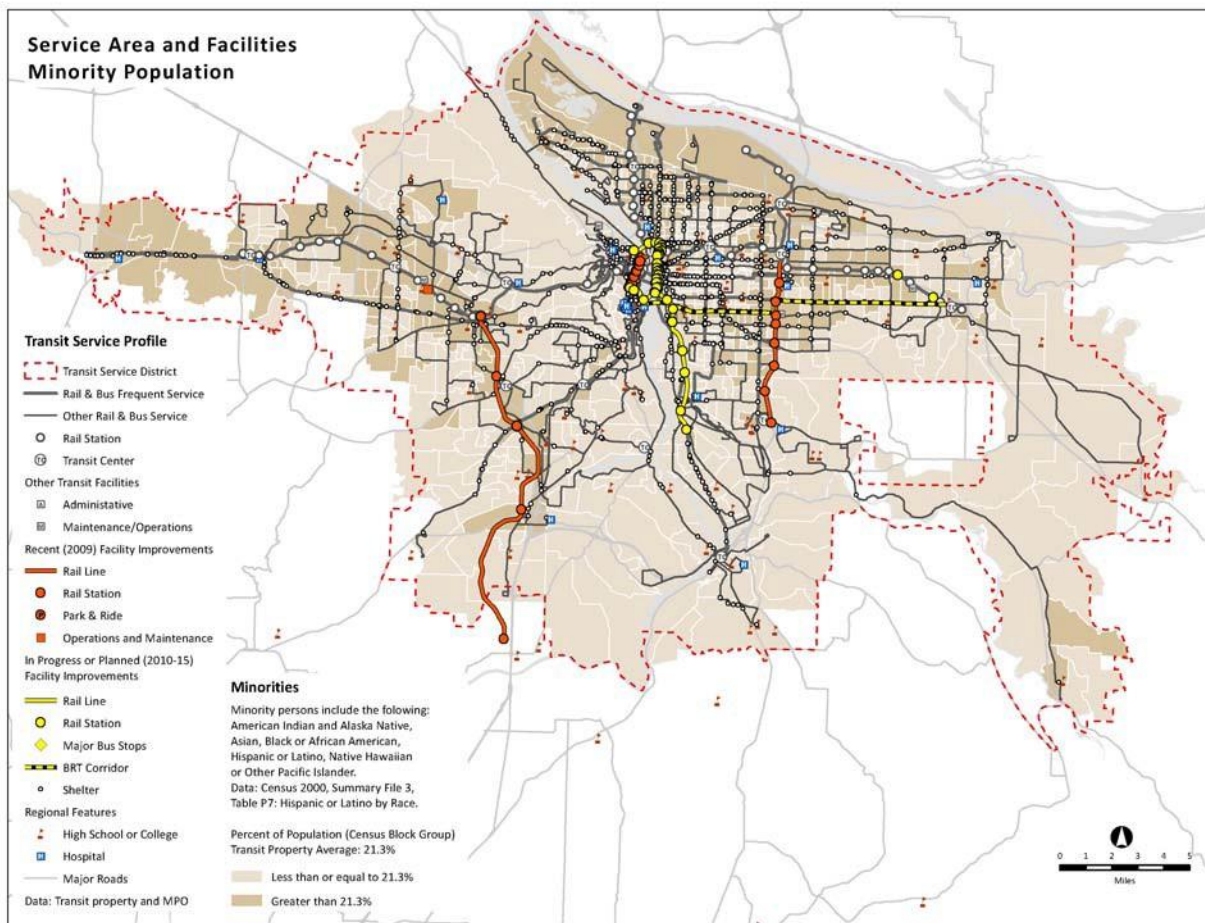
Background

Transit service providers that operate 50 or more fixed route vehicles in peak service and are located in urbanized areas (UZA) of 200,000 or more people, or that otherwise meet the threshold defined in Chapter IV, are required to prepare demographic and service profile maps and charts to determine whether and to what extent transit service is available to minority populations within the recipient's service area. Transit providers shall include charts and tables summarizing data in their Title VI Programs. Transit providers shall not send raw data to FTA unless requested.

The aforementioned transit providers are also required to prepare data regarding customer demographics and travel patterns.

SAMPLE Demographic and Service Profile Maps and Charts





[Additional guidance](#)

FTA will publish additional guidance, and/or update this appendix, with detailed approaches to data collection, surveys and analysis methods.

Appendix J – Requirement to Monitor Transit Service (Requirement for Transit Providers that Operate 50 or More Fixed Route Vehicles in Peak Service and are located in Urbanized Areas (UZA) of 200,000 or More People or that Otherwise Meet the Threshold Defined in Chapter IV)

Background

FTA requires transit providers that operate 50 or more fixed route vehicles in peak service and are located in urbanized areas (UZA) of 200,000 or more people, or that otherwise meet the threshold defined in Chapter IV, to monitor their service standards and policies. Service standards and policies provide the framework for monitoring and assessment of service to compare service provided in areas with a percentage of minority population that exceeds the percentage of minority population in the service area to service provided in areas with a percentage of minority populations that is below the percentage of minority population in the service area.

The following tables and maps are provided as examples of how to assess the performance of service on minority and non-minority routes for each of the transit provider's service standards and service policies. Providers of fixed route public transportation should follow these examples for submitting data in their Title VI Programs. Transit providers should assess transit service and compare actual/observed service to the established service policies and standards. The standards and policies that must be monitored are:

- Standards
 - Vehicle Load for each mode
 - Vehicle Headway for each mode
 - On-Time Performance for each mode
 - Service Accessibility for each mode
 - Policies
 - Vehicle Assignment for each mode
- Distribution of Transit Amenities (Policy and Standards) for each mode

SAMPLE Methodology

This section describes a sample methodology to determine the minority populations served by each bus and rail line, and provides a framework for comparisons.

For each individual bus and/or rail line, calculate the percentages of all persons residing in areas served by the line who are minority persons. Define a unique geographic area of coverage for each line by including all Census Block Groups within one-quarter mile walking distance of bus stops and/or within one-half mile walking distance of rail stations served by that line. For each line, calculate the number of minority persons residing in all Block Groups served, and determine the percentage of minority persons among all persons served by the line.

SAMPLE Monitoring of Service Standards

SAMPLE Vehicle Load Monitoring

Table 1 below shows passenger capacities for buses and light rail cars as the average maximum number of persons seated and standing during the peak one-hour in the peak direction. Maximum load factors represent the maximum achievable capacity, and are calculated by dividing the total seated and standing capacity by the seated capacity of the vehicle.

Table 1. SAMPLE Passenger Capacities

Average Passenger Capacity					
Vehicle Type	Seated	Standing	Total	Load Standard	Maximum Load Factor
30' Bus	28	2	30	1.1	1.5
40' Low-Floor Bus	39	12	51	1.3	1.6
40' Standard Bus	43	17	60	1.4	1.7
Light Rail Vehicle	64	69	133	2.1	2.5

Assessment: Average weekday loads on each line were determined for the following time periods and directions of travel:

- AM in peak direction (7-9 a.m.)
- PM in peak direction (4-6 p.m.)
- Midday in both directions (9 a.m. – 4 p.m.)

Transit providers may create a more sensitive set of analyses by breaking routes into quartiles to determine the highest concentration or they may simply compare minority routes with non- minority routes. Either way they must compare the minority routes with non-minority routes in order to monitor the routes compared to the standards and policies.

Table 2 below shows the average vehicle loads by time period for lines in each quartile, for minority lines, for non-minority lines, and for all lines in the system.

In this example the transit provider uses quartiles to identify all Census Block Groups served by bus lines within ¼ mile walking distance from bus stops and ½ mile walking distance from rail stations. The agency calculated the percentage and number of minority and non-minority populations served by the line. Then, staff ranked all lines by the highest percentage of minority populations and further subdivided the list into four quartiles; Q1, Q2, Q3, Q4; and Q1 being the lines with the lowest percentage of minority populations served and Q4 being the lines with the highest percentage of minority populations served. The breakpoint for Q4 and Q3 were determined by comparing the percent minority with the median percentage of these populations within the agencies service area.

Table 2. Vehicle Loads for Minority and Non-Minority Lines

Shaded Cells Represent Lines Serving Areas with Minority Populations Above the Service Area Average

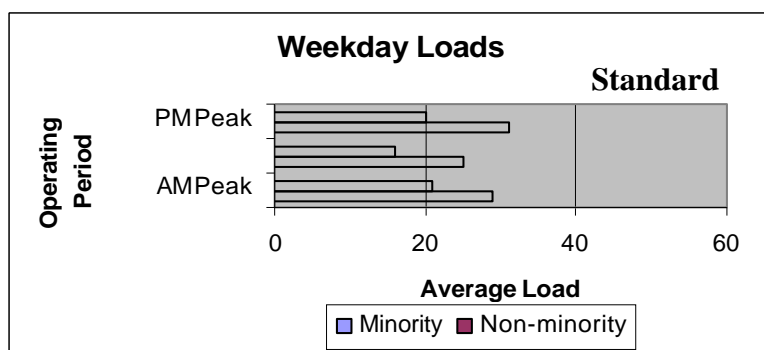
	AM Peak	IB	dday	IB & OB		
Lines and System Load/Seats	Load/Seats	Avg Load	Avg Load		Load/Seats	Avg Load
4th Quartile (Minority Population > 29%)	0.62	34	5	28	0.65	37
3rd Quartile (Minority Population > 21.6%)	0.60	24	4	21	0.62	24
2nd Quartile (Minority Population > 16.6%)	0.59	23	9	18	0.59	22
1st Quartile (Minority Population < 16.6%)	0.49	18	9	14	0.48	18
Minority Lines (3rd and 4th Quartiles)	0.61	29	4	25	0.64	31
Non-Minority Lines (1st and 2nd Quartiles)	0.54	21	4	16	0.54	20
System	0.58	25	9	21	0.59	26

Currently, no line exceeds the standard.

The average load factors in the AM peak were .61 for minority lines and .54 for non-minority lines. The average load factors in the PM peak were .64 for minority lines and .54 for non-minority lines. No lines exceeded the vehicle load standard during the peak periods.

Figure 1 below depicts the average loads for minority and non-minority lines for PM peak, midday, and AM peak as shown in Table 2 above, in comparison to the maximum capacity of 62 passengers for a 40-foot bus.

Figure 1. Vehicle Loads for Minority and Non-Minority Lines by Peak Period



SAMPLE Vehicle Headway Monitoring

SAMPLE Assessment: Table 3 below shows the average headway in minutes for minority and non-minority lines for AM peak, midday, PM peak, evening, and night periods, for weekday, Saturday, and Sunday, respectively. The average span of service in hours and tenths of hours is shown for minority and non-minority lines for weekdays, Saturdays, and Sundays, respectively.

Table 3. Weekday, Saturday and Sunday Headways and Span of Service on Weekdays, Saturdays, and Sundays, for Minority and Non-Minority Lines

WEEKDAY	Lines Operating	% Operating	Freq Lines	Rail Lines	Service Begins	AM Peak Headway	Midday Headway	PM Peak Headw	Eve Head way	Night Headw ay	Svc Ends	Span (Hours)
4th Quartile (Minority Population > 29%)	25	100%	5	3	5:14 a	26	28	27	31	41	9:48 p	16.6
3rd Quartile (Minority Population > 21.6%)	24	100%	6		5:14 a	21	26	22	30	44	10:52 p	17.6
2nd Quartile (Minority Population > 16.6%)	24	100%	3		5:33 a	27	39	27	38	42	8:56 p	15.4
1st Quartile (Minority Population < 16.6%)	24	100%	2		5:45 a	30	38	31	45	53	8:13 p	14.5
Minority Lines (3rd and 4th Quartiles)	49	100%	11		5:14 a	24	27	24	30	43	10:19 p	17.1
Non-Minority Lines (1st and 2nd Quartiles)	48	100%	5		5:39 a	29	38	29	41	47	8:35 p	14.9
System	97	100%	16		5:26 a	26	32	27	34	44	9:29 p	16.0

SATURDAY	Lines Operating	% Operating	Freq Lines	Rail Lines	Service Begins	Daytime Headway	Evening Headway	Night Headway	Service Ends	Span (Hours)
4th Quartile (Minority Population > 29%)	18	72%	5	3	5:35 a	33	37	36	10:22 p	16.8
3rd Quartile (Minority Population > 21.6%)	19	79%	6		5:52 a	25	38	45	12:00 a	18.1
2nd Quartile (Minority Population > 16.6%)	16	67%	3		6:50 a	43	48	48	8:56 p	14.1
1st Quartile (Minority Population < 16.6%)	11	46%	2		7:50 a	37	45	50	9:11 p	13.3
Minority Lines (3rd and 4th Quartiles)	37	76%	11		5:43 a	29	38	42	11:13 p	17.5
Non-Minority Lines (1st and 2nd Quartiles)	27	56%	5		7:15 a	40	47	49	9:02 p	13.8
System	64	66%	16		6:21 a	34	41	44	10:19 p	16.0

SUNDAY	Lines Operating	% Operating	Freq Lines	Rail Lines	Service Begins	Daytime Headway	Evening Headway	Night Headway	Service Ends	Span (Hours)
4th Quartile (Minority Population > 29%)	17	68%	5	3	6:08 a	34	39	33	10:38 p	16.5
3rd Quartile (Minority Population > 21.6%)	19	79%	6		6:27 a	32	46	46	11:33 p	17.1
2nd Quartile (Minority Population > 16.6%)	13	54%	3		7:02 a	45	48	48	9:55 p	14.9
1st Quartile (Minority Population < 16.6%)	7	29%	2		7:57 a	34	40	45	8:52 p	12.9
Minority Lines (3rd and 4th Quartiles)	37	76%	11		6:18 a	33	43	42	11:07 p	16.8
Non-Minority Lines (1st and 2nd Quartiles)	27	56%	5		7:21 a	41	46	47	9:33 p	14.2
System	64	66%	16		6:40 a	36	44	44	10:33 p	15.9

Shaded cells represent minority lines.

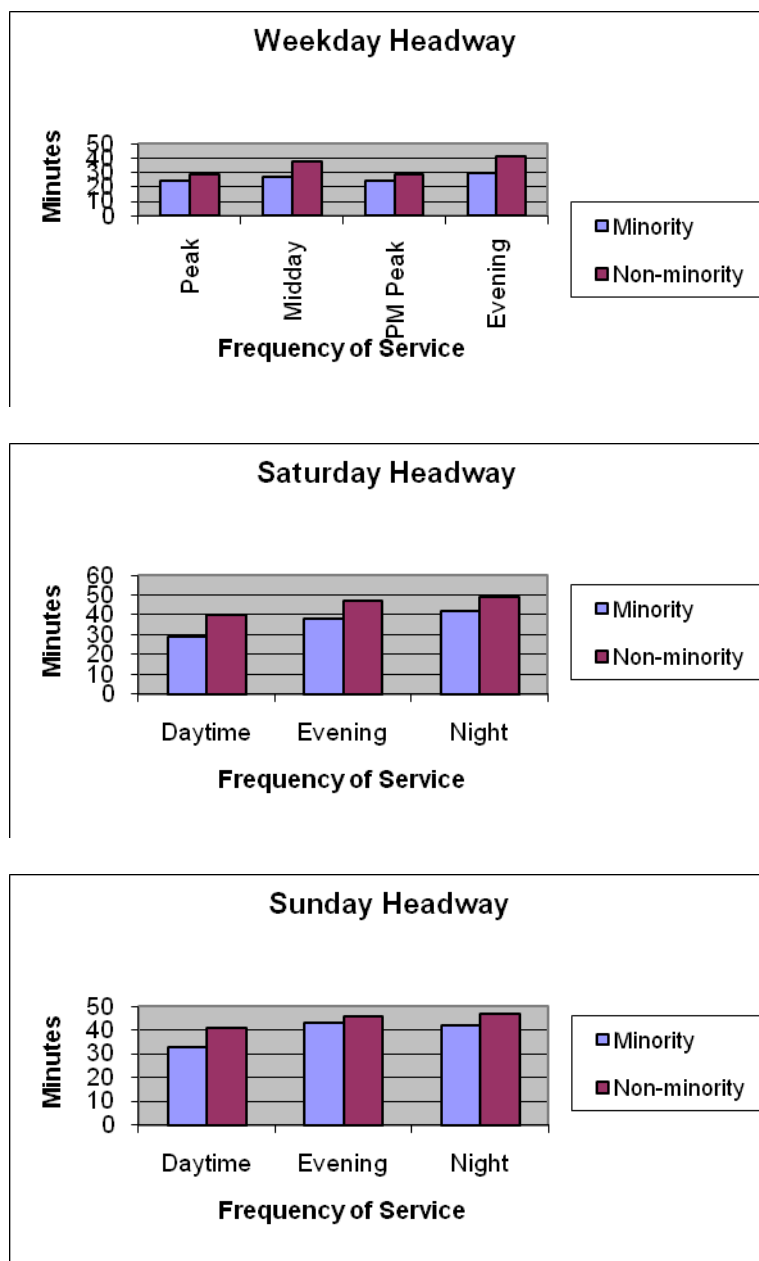
On weekdays, Saturdays, and Sundays, eleven (11) minority lines and five (5) non-minority lines were designated as Frequent Service lines (i.e., Freq Lines). On weekdays, the average AM and PM peak headway on minority lines was 24 minutes, versus 29 minutes on non-minority lines.

Average headways on minority lines during weekday midday, evening, and night periods were lower (i.e., provided more frequent service) than on non-minority lines. Minority lines had an average weekday span of service of 17.1 hours, as compared with a 14.9 span of service on non-minority lines.

On Saturdays and Sundays, average daytime headways on minority lines were 29 and 33 minutes, respectively, versus 40 and 41 minutes, respectively, for non-minority lines. Average headways on minority lines during Saturday and Sunday evening and night periods were lower (i.e., provided more frequent service) than on non-minority lines. Minority lines had average Saturday and Sunday span of service of 17.5 and 16.8 hours, respectively, as compared with a 13.8 and 14.2 span of service on non-minority lines.

Figure 2 below depicts weekday headways for minority and non-minority lines for AM peak, midday, PM peak, and evening. Saturday and Sunday headways for minority and non-minority lines are shown for daytime, evening, and night periods. In all days and time periods, average frequency of service on minority lines exceeded frequency of service on non-minority lines (i.e., the average headway in minutes was lower on minority lines).

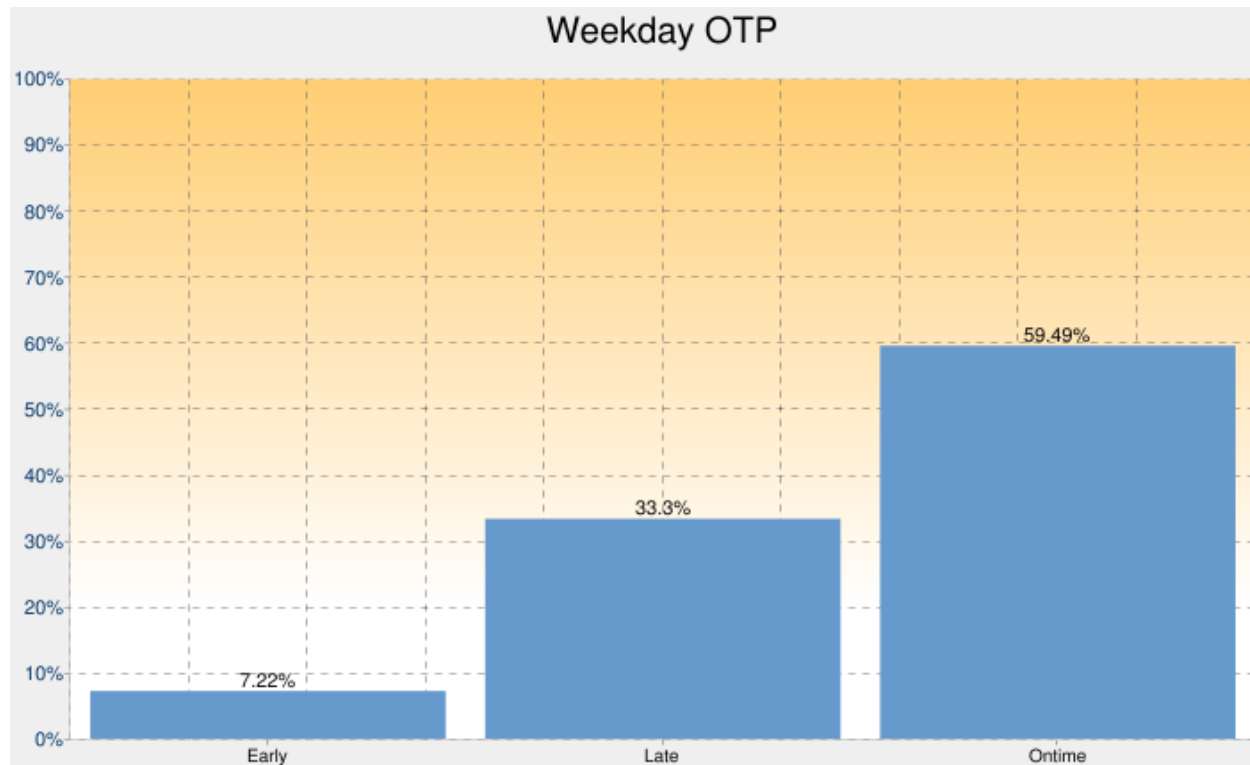
Figure 2. Headways for Minority and Non-Minority Lines on Weekdays, Saturdays, and Sundays by Time Period



SAMPLE On-Time Performance Monitoring

SAMPLE Figure: Figure 3 below shows that 59.49% of transit vehicles passed time points on time, 7.22% passed time points early, and 33.3% passed time points late. This information would be compared with the On-Time Performance Standard and analyzed to determine potential disparate impacts.

Figure 3. Weekday On-Time Performance



Courtesy of ACE Transit

SAMPLE Assessment: The City of USA initiated a random spot check program to assess a variety of performance measures, including on-time performance. This “Mystery Rider” program completed a total 77 observations during the past fiscal year. Of the 77 bus trips observed, approximately five (5) percent were found departing a schedule time point late (i.e., more than 5 minutes after the departure time in the printed schedule). These routes on which late departures were observed were:

- B07
- R10
- R24
- B48

Of these four routes, three (B07, R10, and R24) have a greater-than-average proportion of route miles in minority Census blocks. These findings suggest that additional monitoring of on-time performance to assess potential disparate impacts is warranted. The City of USA will initiate additional on-time performance monitoring as part of the “Mystery Rider” spot check program.

SAMPLE Service Availability Monitoring

SAMPLE Assessment: Table 4 below shows the percentages of minority and non-minority households served. The percentage of minority households within a ½ mile walk of stops and/or stations was 86.6%. The percentage of non-minority households within a ½ mile walk of stops and/or stations was 76.8%.

[Table 4. Service Availability for Minority and Non-Minority Residents](#)

Households	Within ½ Mile	More than ½ Mile
Minority	86.6%	13.4%
Non-Minority	76.8%	23.2%
System	78.5%	21.5%

Source: 2000 Census Block Group Data

All residents of Census Block Groups where geographic center of the Block Group is within ½- mile walk of a bus stop and/or rail station are considered within ½-mile of service.

[SAMPLE Monitoring of Service Policies](#)

[SAMPLE Vehicle Assignment Monitoring](#)

SAMPLE Assessment: Table 5 below shows the average age of buses in relation to minority population served. In this case, all rail lines are minority lines, so rail vehicle age is excluded from the calculation of average vehicle age. Buses on minority lines had an average age of 12.1 years, compared to the system bus fleet average age of 12.7 years.

[SAMPLE Table:](#)

Table 5. Vehicle Assignment

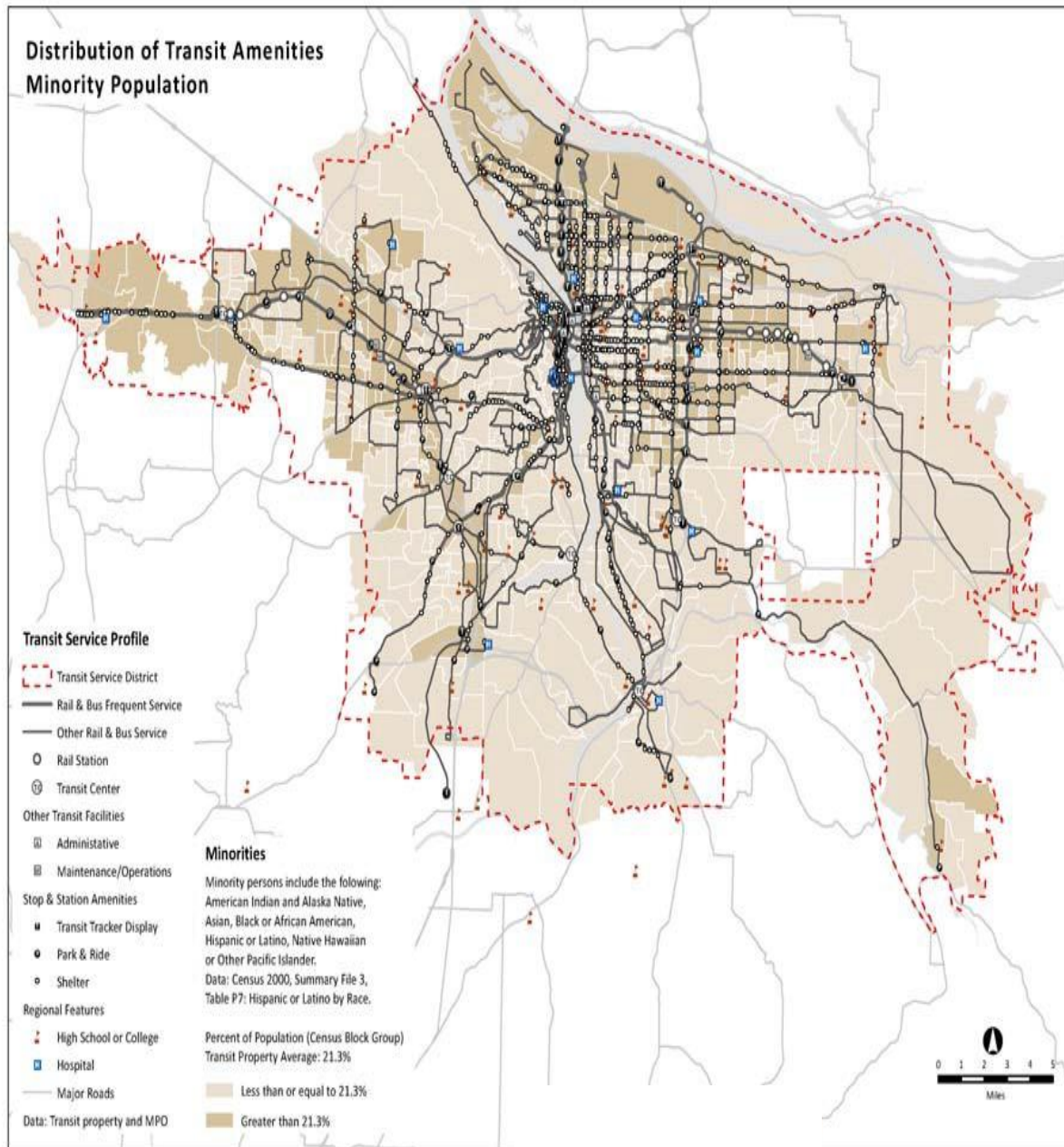
Shaded Cells Represent Lines Serving Areas with Minority Percentages Above the Median

Average Vehicle Age	Avg Date of Purchase	Avg Age of Buses	Lines with Low Floor Buses
4 th Quartile (Minority Population > 29%)	1994.4	13.1	8
3 rd Quartile (Minority Population > 21.6%)	1996.3	11.2	9
2 nd Quartile (Minority Population > 16.6%)	1994.3	13.2	4
1 st Quartile (Minority Population < 16.6%)	1994.3	13.2	5
Minority Lines (3 rd and 4 th Quartiles)	1995.4	12.1	17
Non-Minority Lines (1 st and 2 nd Quartiles)	1994.3	13.2	9
System	1994.8	12.7	26

SAMPLE Transit Amenities Monitoring

The overlay map below shows the locations of many of the transit agency's amenities, including park and ride facilities, transit centers, pedestrian improvements, and bus shelters, relative to the locations of bus and rail routes and the locations of minority and non-minority populations. Such a map is one way to demonstrate how amenities are distributed across the transit system.

[Figure 4. Transit Amenities Overlay Map](#)



[Appendix K – Service and Fare Equity Analysis Questionnaire Checklist \(Requirement for Transit Providers that Operate 50 or More Fixed Route Vehicles in Peak Service and are Located in Urbanized Areas \(UZA\) of 200,000 or More People or that Otherwise Meet the Threshold Defined in Chapter IV\)](#)

Background

Transit providers that operate 50 or more fixed route vehicles in peak service and are located in urbanized areas (UZA) of 200,000 or more people, or that otherwise meet the threshold defined in Chapter IV, must conduct a Title VI equity analysis whenever they plan a fare change and/or a major service change. Equity analyses are required regardless of whether proposed changes would cause positive or negative impacts to riders. In other words, transit providers must conduct an equity analysis for all fare changes and for major service reductions and major service expansions. Financial exigencies and other special circumstances (e.g., economic hardships, size of transit provider's service area or staff) do not exempt transit providers from the requirement to conduct equity analyses.

[Service and Fare Equity Questionnaire Checklist](#)

(1) Considerations for Service Equity Analysis

[A. Major Service Change Policy](#)

- ☐ We have briefly and clearly stated our Major Service Change Policy.
- ☐ We have briefly and clearly explained how this particular service change meets or exceeds our Major Service Change Policy.
- ☐ Our Major Service Change Policy is presented as a numerical standard, applies to both service reductions and service increases, and is not set so high as to never require an analysis.
- ☐ We have included a description of the public engagement process for setting the major service change policy.
- ☐ We have included a copy of board meeting minutes or a resolution demonstrating the boards or governing entity or official(s)'s consideration, awareness, and approval of the major service change policy.

B. Adverse Effects

- ☐ We have defined and analyzed adverse effects related to major service changes, paying attention to the fact that elimination of a route will likely have a greater adverse effect than a reduced frequency (headway change) in service. We have analyzed service between the existing and proposed service, and have considered the degree of the adverse effects when planning service changes.

C. Disparate Impact Policy

- ☐ We have briefly and clearly stated our policy to determine when a “disparate impact” occurs in the context of major service changes, including both service reductions and/or expansions. In particular, our agency has established a threshold for determining whether adverse effects are borne disproportionately by minority populations.
- ☐ Our agency applies the disparate impact policy uniformly to all major service changes, regardless of mode.
- ☐ Our policy describes how we engaged the public in developing our policy for measuring disparate impacts.
- ☐ We have included a copy of board meeting minutes or a resolution demonstrating the boards or governing entity or official(s)’s consideration, awareness, and approval of the disparate impact policy.

D. Disproportionate Burden Policy

- ☐ We have briefly and clearly stated our policy to determine when a disproportionate burden occurs in the context of major service changes. In particular, our agency has established a threshold for determining whether adverse effects are borne disproportionately by low-income populations.
- ☐ Our agency applies the disparate impact policy uniformly to all major service changes, regardless of mode
- ☐ Our policy describes how we engaged the public in developing the disproportionate burden policy.
- ☐ We have included a copy of board meeting minutes or a resolution demonstrating the boards or governing entity or official(s)’s consideration, awareness, and approval of the disproportionate burden policy.

E. Analysis Framework

- ☐ We have described the dataset(s) used in the analysis and provided the reason for the dataset(s) selected, as well as the techniques and/or technologies used to collect the data.
- ☐ If using general population for the comparison population, we have described the geographic level (e.g., Census block, Census block group, TAZ, etc.) at which we have measured minority and low-income concentrations.
- ☐ If using ridership as the comparison population, we have described how we determined the minority and low-income ridership of affected routes and the system as a whole.

F. Assessing Impacts

- ☐ We have shown how the proposed major service changes would impact minority and low-income populations at the geographic level by including the following:
 - **Overlay maps** showing proposed service changes as well as demographic data in order to study the affected population
 - **Tables** showing impacts associated with each type of route or service change (e.g., routing, frequency, span of service, addition or elimination of routes).
- ☐ We have used our adverse effects definition and our disparate impact policy and compared the proportion of minorities adversely affected to the proportion of non-minorities adversely affected.
- ☐ We have provided a step-by-step description of the analytical methodology we followed to determine whether the proposed change(s) would have a disparate impact on minority populations.
- ☐ We have identified whether minority populations will experience disparate impacts.
- ☐ If we have determined that a disparate impact exists, we have considered modifying our proposal to remove these impacts. If we modified our proposal, we have analyzed the modified proposal to determine whether minority populations will experience disparate impacts.
- ☐ If we have determined that a disparate impact exists and we will make the service changes despite these impacts, we have also:
 - Clearly demonstrated that we have a substantial legitimate justification for the proposed service changes; and

- Clearly demonstrated that we analyzed alternatives to determine whether the proposed service changes are the least discriminatory alternative.
- ☐ We have used our adverse effects definition and our disproportionate burden policy and compared the proportion of low-income persons adversely affected to the proportion of non-low-income persons adversely affected.
- ☐ We have provided a step-by-step description of the analytical methodology we followed to determine whether the proposed change(s) would have a disproportionate burden on low-income populations.
- ☐ We have identified whether low-income populations will experience disproportionate burdens.
- ☐ If we have determined that a disproportionate burden exists, we have also taken steps to avoid, minimize, or mitigate impacts where practicable. We have also described alternatives available to low-income passengers affected by the service changes.
 - Note: Alternatives could include the availability of other lines or services, potentially involving transfers and/or other modes, which connect affected riders with destinations that they commonly access. Depending on the nature of impacts, service-related mitigation could include strategies such as alignment or frequency changes to nearby lines or services to offer more convenient access to affected areas.
- ☐ If we are proposing a service improvement, we have analyzed accrual of benefits for minority populations as compared to non-minority populations, and low-income populations as compared to non-low-income populations, using the comparison population we selected (i.e., ridership or service area).
- ☐ If service is proposed to be increased and/or expanded, but minority and/or low-income populations are not expected to benefit from the expansion as much as non-minority and/or non-low-income populations, then we have explained how our agency plans to improve service to the minority and/or low-income populations.
- ☐ We have described any plans our agency has developed to restore service as additional funds become available.

Exhibit 1.

SAMPLE reporting of proposed headway change based on ridership.

Impact of Service Adjustments on Minority and Low Income Passengers								
Bus Lines	Wkly Ons	Under20k	Minority	%<20k	%	Impacted Ons	Under20k	Minority
1	50,340	25,081	21,602	50%	43%	1,453	724	624
2	56,929	20,727	10,639	36%	19%	4,623	1,683	864
3	39,479	15,902	7,414	40%	19%	2,396	965	450
4	18,396	7,309	4,509	40%	25%	688	273	169
5	52,845	21,450	13,172	41%	25%	1,572	638	392
6	952	446	248	47%	26%	237	111	62
7	4,562	679	2,012	15%	44%	659	98	291
8	1,781	455	414	26%	23%	280	71	65
9	13,596	4,177	4,093	31%	30%	1,161	357	349
10	19,346	7,186	4,965	37%	26%	1,014	377	260
11	65,337	33,005	22,653	51%	35%	998	402	187
12	19,406	7,565	3,864	39%	20%	378	150	93
13	21,728	7,379	4,359	34%	20%	931	378	232
Ridership Adjusted Lines	364,697	151,360	99,943	42%	28%	16,390	6,228	4,037
Total Percent							38%	25%
Ridership All	1,266,568	527,728	381,169	42%	30%			

“Impacted Ons” is calculated by taking the number of trips eliminated in a given hour times the number of passengers per trip during that hour and adding up the number of passengers impacted in a week.

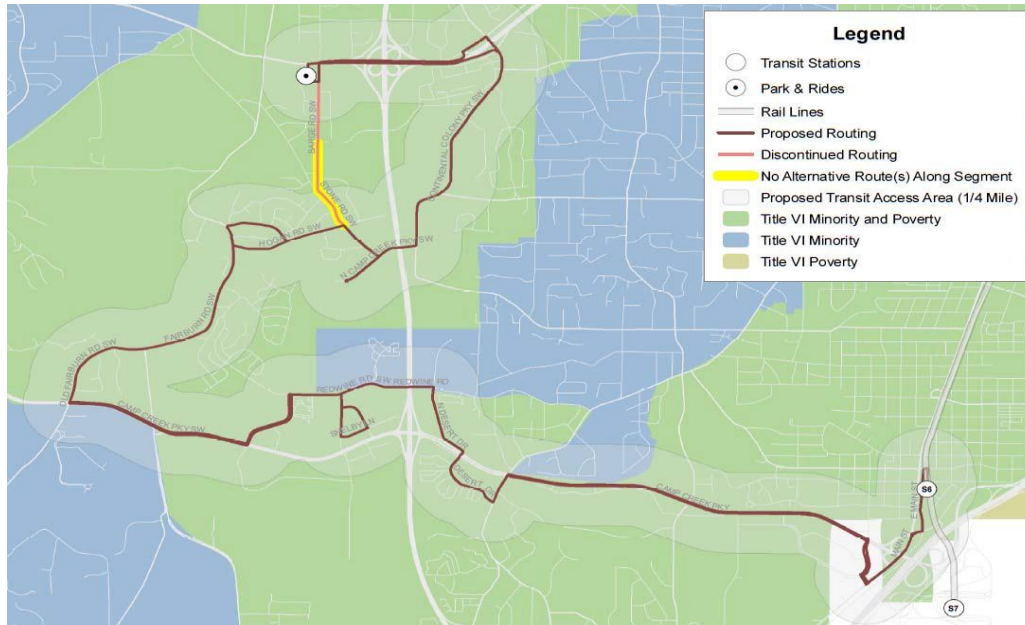
In the table above, an agency has assessed how proposed reductions in service frequency (headway changes) would impact minority and low-income passengers on a bus-only system. Here, the cumulative proposed reduction in service frequency will impact minority and low-income passengers slightly less than their proportion of ridership of the system.

Notably, assessing the cumulative impacts of the route changes appears to reduce the impacts of some of the changes, while increasing the impacts of other changes. Transit providers should consider whether to evaluate changes to routes separately or cumulatively and include this in their disparate impact policy.

If the cumulative impact analysis showed a different result, i.e., a higher percent of minority or low-income populations being impacted than their presence in the overall ridership, the transit provider would likely want to take another look at the routes with high passenger counts and higher-than-system-average minority and/or low-income passengers in order to adjust the changes and reduce the adverse effects.

Exhibit 2.

SAMPLE GIS map depicting proposed route changes and nearby minority and low-income concentrations.



Type of Service Change	Minority Proportion of Population		Low-Income Proportion of Population	
	Census blocks along routes	Average population in service area	Census blocks along routes	Average population in service area
Changes in Routing	38.9%	34.3%	13.7%	12.2%
Headway Changes	27.5%	34.3%	11.0%	12.2%
Route discontinuation	30.6%	34.3%	12.8%	12.2%

In the table above, the transit provider has analyzed the cumulative impacts of each type of service change on minority populations and low-income populations in its service area. The analysis is based on block-level Census demographic data and therefore does not represent ridership directly.

The changes in routing appear to affect minority populations more adversely than the population as a whole, and the changes in routing and route discontinuations appear to affect low-income populations more adversely than the population as a whole. The transit provider's ultimate determination of disparate impact on minority riders or disproportionate burden on low-income riders would depend on the disparate impact and disproportionate burden threshold policies developed by the transit provider through a public participation process.

Exhibit 3.

SAMPLE Population Comparison

Table 1 - Regional Population Data				
Total Population of Service Area	Minority Population	Percent Minority	Low- income Population	Percent Low- Income
242,916	50,829	21%	43,000	18%

Table 2 - Affected Census Block Area Population Data						
Route #	Change type	Total Population affected Census blocks	Minority Population	Percent Minority	Low- Income Population	Percent Low- Income
Route 6	Discontinued	5870	800	14%	250	4%
Route 7	Discontinued	9500	2500	26%	2100	22%
Total		15370	3300	21%	2350	15%

Here, the transit provider is proposing elimination of two routes, and is using population data, not ridership data. The affected population is the Census blocks with access to the route, generally defined as a one-quarter mile walk to a bus stop or a one-half mile walk to a rail station. While the elimination of Route 7 appears to affect low-income and minority populations more adversely than the population as a whole, the provider's ultimate determination of disparate impact on minority riders or disproportionate burden on low-income riders would depend on the disparate impact and disproportionate burden threshold policies developed by the transit provider through a public participation process.

Notably, assessing the cumulative impacts of the two route changes appears to reduce the impacts of the elimination of Route 7. Transit providers should consider whether to evaluate changes to routes separately or cumulatively and include this in their disparate impact policy. See the example on the next page for a different result.

Exhibit 4.

SAMPLE Ridership Comparison

Table 3 - Regional Ridership Data				
Total System-wide Riders	Minority Riders	Percent Minority	Low-Income Riders	Percent Low-Income
3,224,000	1,346,000	42%	1,235,000	38%

Table 4 - Affected Route Ridership Data					
	Discontinued Segment - Ridership	Minority Riders	% Minority Riders	Low-Income Riders	% Low-Income Riders
Route 1	20,800	6,000	29%	4,700	23%
Route 2	72,600	33,400	46%	31,200	43%
Total	93,400	39,400	42%	35,900	38%

Here, the transit provider is proposing eliminating segments of two different routes (shortlining). The elimination of a segment of Route 2 appears to affect minority and low-income passengers more adversely than ridership of the system as a whole; however, the provider's ultimate determination of disparate impact on minority passengers or disproportionate burden on low-income passengers would depend on the disparate impact and disproportionate burden threshold policies developed by the transit provider through a public participation process.

Here, assessing the cumulative impacts of two short lined routes appears to increase the adverse effects of the change to Route 1, and decrease the effects of the change to Route 2. Transit providers should consider whether to evaluate changes to routes separately or cumulatively and include this in their disparate impact policy.

Exhibit 5.

SAMPLE Impacts to passengers

Type of Service Change	Ridership of affected route			Ridership of system	
	Total Boardings	% Minority	% Low-Income	% Minority	% Low-Income
Service span (reduction of entire trips)	24	83%	17%	73.7%	10%

Here, a transit provider that operates service into the late evening has proposed to discontinue trips that begin after 10:00 p.m. In this example, the provider's ridership is the basis of the analysis, not the population of adjacent Census blocks. The table shows that both minority populations and low-income populations would bear a disproportionate share of the service change, when comparing the ridership of the affected route with the ridership of the system as a whole. However, the ridership that is affected is relatively small, particularly if it is divided over a number of trips.

As with the other examples, the provider's ultimate determination of disparate impact on minority passengers or disproportionate burden on low-income passengers would depend on the disparate impact and disproportionate burden threshold policies developed by the transit provider through a public participation process.

When changes are disproportionately borne by minority passengers, and the provider determines there is a disparate impact based on its policy, the transit provider can make the change as long as it can clearly demonstrate that it has a substantial legitimate justification for the proposed service changes; and the transit provider clearly demonstrates that it analyzed alternatives to determine whether the proposed service changes are the least discriminatory alternative.

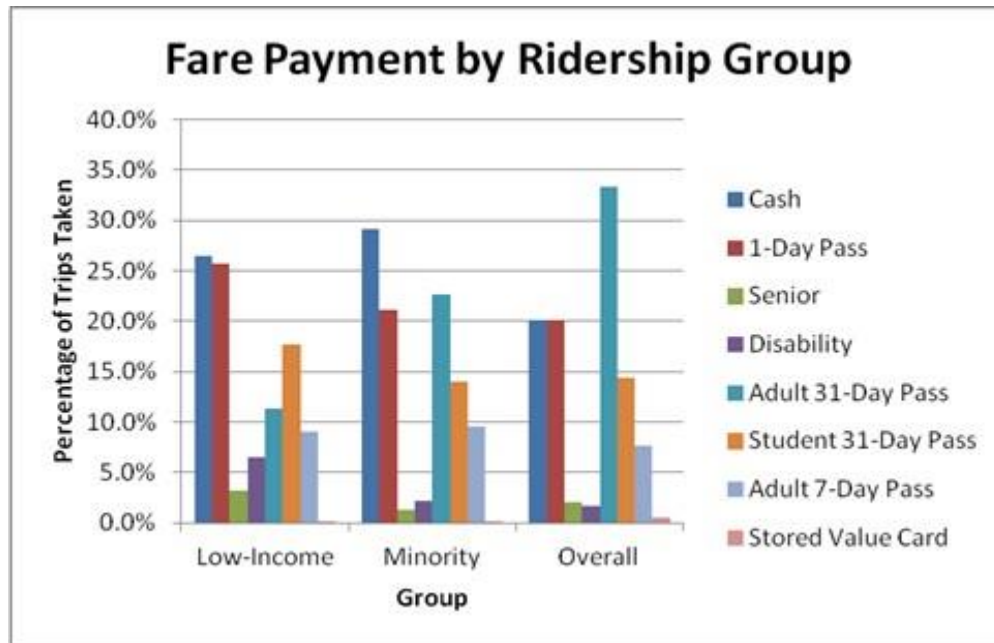
If the transit provider determines there is a disproportionate burden on low-income passengers, the transit provider should review alternatives to see if the impacts on the low-income passengers can be avoided, minimized, or mitigated.

(2) Considerations for a Fare Equity Analysis

- ☐ We have briefly and clearly stated our policy to determine when a “disparate impact” occurs in the contexts of fare changes. In particular, our agency has developed policy thresholds (in terms of absolute numbers or proportions) for identifying disparate impacts.
- ☐ Our policy specifies how we engaged the public in developing our policy for measuring disparate impacts.
- ☐ We have briefly and clearly stated our disproportionate burden policy, and our policy describes how we engaged the public in developing the disproportionate burden policy.
- ☐ We have analyzed the fare media generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or fare media that would be subject to the fare increase or decrease (see sample, page K-12).
- ☐ We have determined the number and percent of users of each fare media proposed for increase or decrease.
 - Our analysis includes a profile of fare usage by group—minority, low-income, and overall ridership—as shown below.
 - If the proposed changes would only affect certain fare media, the analysis should address whether focusing changes on those fare media may lead to a disparate impact or disproportionate burden.
- ☐ We have clearly depicted the information in tabular format.
 - The table depicts the fare media comparing the existing cost, the percent change, and the usage of minority groups as compared to overall usage and low-income groups as compared to overall usage. We have clearly analyzed fare media for minority groups distinct from low-income.
- ☐ We have compared the differences in impacts between minority users and overall users.
- ☐ We have compared the differences in impacts between low-income users and overall users.
- ☐ We have analyzed any alternative transit modes, fare payment types, or fare media available for people affected by the fare change.
 - Analysis compared the fares paid by the proposed changes with fares that would be paid through available alternatives.

- Analysis shows whether vendors that distribute/sell the fare media are located in areas that would be convenient to impacted populations.
- ☐ We have identified whether minority populations will experience disparate impacts.
- ☐ If we have determined that a disparate impact exists, we have considered modifying our proposal to remove these impacts. If we modified our proposal, we have analyzed the modified proposal to determine whether minority populations will experience disparate impacts.
- ☐ If we have determined that a disparate impact exists and we will make the fare changes despite these impacts, we have also:
 - Clearly demonstrated that we have a substantial legitimate justification for the proposed fare changes; and
 - Clearly demonstrated that we analyzed alternatives to determine whether the proposed fare changes are the least discriminatory alternative.
- ☐ If we have documented a disparate impact or a disproportionate burden, we have explored alternatives and mitigation, including the timing of implementing the fare increases, providing discounts on passes to social service agencies that serve the impacted populations, and other alternatives as appropriate.

Charting fare payment by ridership group (as shown on the next page) can be a useful early step in a fare equity analysis to understand how fare media usage varies between low-income riders, minority riders, and overall ridership. Comparing fare payment patterns for minority versus non-minority and low-income versus higher-income riders can yield even clearer depictions of differences that should be considered when developing fare change proposals.



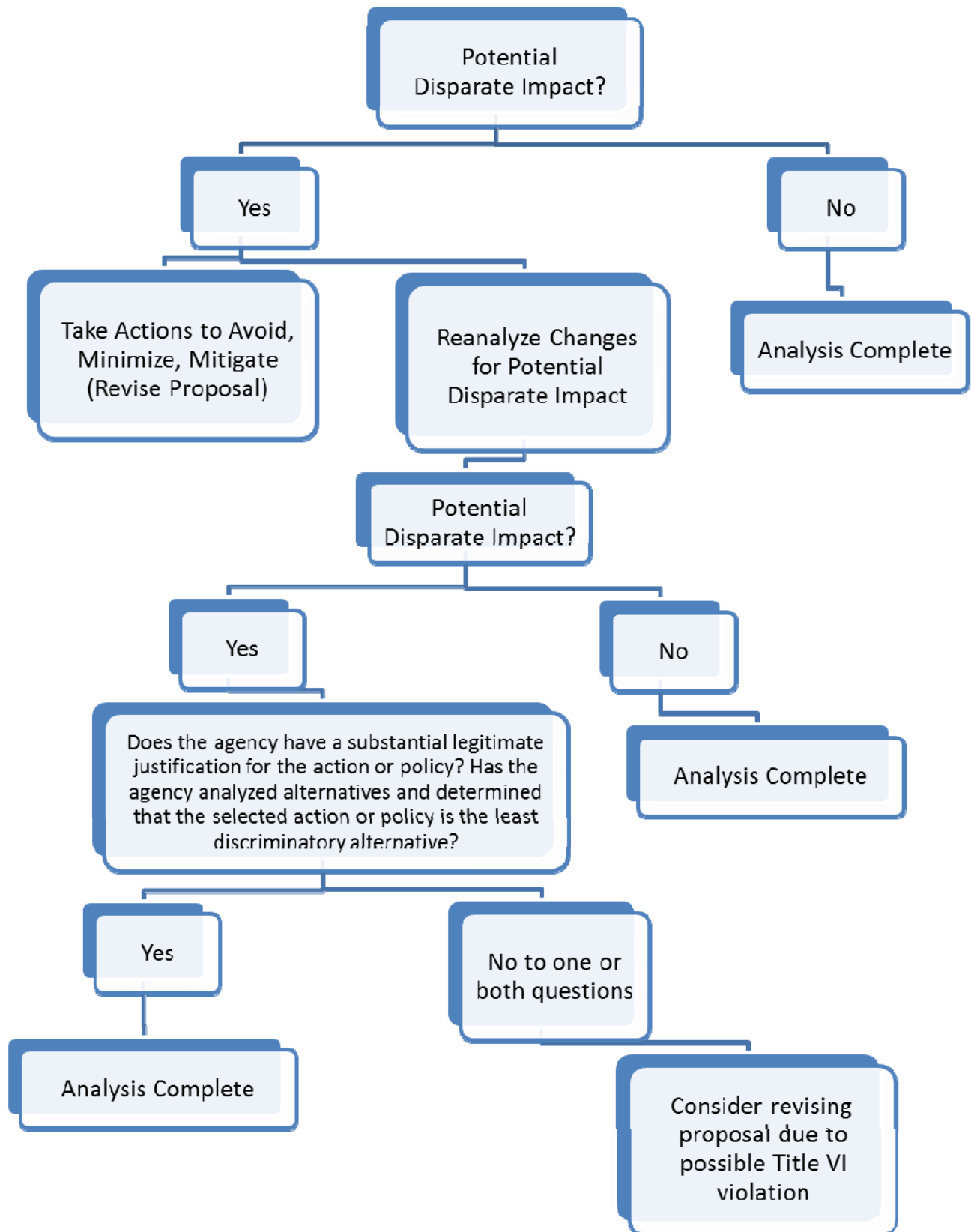
SAMPLE Fare Equity Analysis

Count	Cost		Change		Usage by Group		
Fare type	Existing	Proposed	Absolute	Percentage	Low-Incom	Minority	Overall
Cash	\$1.50	\$2.00	\$0.50	33.3%	308,287	402,021	451,152
1-Day Pass	\$4.50	\$5.50	\$1.00	22.2%	299,880	290,456	448,907
Senior	\$0.50	\$0.75	\$0.25	50.0%	37,536	17,681	46,077
Disability	\$0.50	\$1.00	\$0.50	100.0%	75,440	29,280	38,600
Adult 31-Day Pass	\$57.00	\$63.00	\$6.00	10.5%	132,720	311,225	746,769
Student 31-Day	\$30.00	\$35.00	\$5.00	16.7%	205,708	192,661	323,150
Adult 7-Day Pass	\$15.00	\$17.00	\$2.00	13.3%	105,831	132,135	170,300
10-Ride Card	\$13.50	\$18.00	\$4.50	33.3%	184	780	11,400
Total					1,165,586	1,376,239	2,236,355

% of Total	Cost		Change		Usage by Group		
Fare type	Existing	Proposed	Absolute	Percentage	Low-Incom	Minority	Overall
Cash	\$1.50	\$2.00	\$0.50	33.3%	26.4%	29.2%	20.2%
1-Day Pass	\$4.50	\$5.50	\$1.00	22.2%	25.7%	21.1%	20.1%
Senior	\$0.50	\$0.75	\$0.25	50.0%	3.2%	1.3%	2.1%
Disability	\$0.50	\$1.00	\$0.50	100.0%	6.5%	2.1%	1.7%
Adult 31-Day Pass	\$57.00	\$63.00	\$6.00	10.5%	11.4%	22.6%	33.4%
Student 31-Day	\$30.00	\$35.00	\$5.00	16.7%	17.6%	14.0%	14.4%
Adult 7-Day Pass	\$15.00	\$17.00	\$2.00	13.3%	9.1%	9.6%	7.6%
Stored Value Card	\$13.50	\$18.00	\$4.50	33.3%	0.0%	0.1%	0.5%
Total					100.0%	100.0%	100.0%

Here, an agency has presented a fare increase proposal and determined fare media usage for low-income, minority and overall ridership from a rider survey. Although a price increase is proposed for all fare media, certain media used disproportionately by low-income and/or minority riders (such as cash fares, one-day passes, and disability fares) are proposed for more substantial price increases than other media used more commonly by other riders (particularly the adult 31-day pass). In order to make an appropriate assessment of disparate impact or disproportionate burden, the transit provider must compare the survey data, and show the number and percent of minority riders and low-income riders using a particular fare media. While the changes appear to affect low-income and minority riders more adversely than other riders, the agency's ultimate determination of disparate impact on minority riders or disproportionate burden on low-income riders would depend on the disparate impact and disproportionate burden threshold policies developed by the transit provider through a public participation process.

Disparate Impact Analysis



Appendix M – Title VI and Limited English Proficiency Technical Assistance Resources (General Requirement)

The following resources should help recipients integrate the guidance and procedures of this circular into their planning and operations. Recipients seeking additional resources that may have been published subsequent to the date of this circular may inquire with their local FTA Regional Office or FTA's Office of Civil Rights. Technical assistance resources will be published on the FTA Office of Civil Rights website, http://www.fta.dot.gov/civil_rights.html, on an ongoing basis.

1. Relevant Websites. Recipients and subrecipients are encouraged to review information on the following websites:
 - a. FTA's Title VI Website. www.fta.dot.gov/civilrights/civil_rights_5088.html. This website provides an overview of FTA's Title VI activities, including links to recent compliance reviews of recipients, related websites, policy guidance and procedures, and instructions on how to file a Title VI complaint.
 - b. Federal Interagency Working Group on Limited English Proficiency. www.lep.gov promotes a cooperative understanding of the importance of language access to Federal programs and Federally-assisted programs. The site acts as a clearinghouse, providing and linking to information, tools, and technical assistance regarding limited English proficiency and language services for Federal agencies, recipients of Federal funds, users of Federal programs and Federally-assisted programs, and other stakeholders.
 - c. U.S. Department of Justice Civil Rights Division. <http://www.justice.gov/crt/> The Civil Rights Division of the Department of Justice, established in 1957, is the program institution within the Federal government responsible for coordinating the implementation and enforcement of Federal statutes prohibiting discrimination on the basis of race, color, national origin, and other protected classes.
 - d. Community Impact Assessment website is <http://www.ciatrans.net>. The Community Impact Assessment (CIA) website seeks to inform transportation officials and the general public about the potential impacts of proposed transportation actions on communities and their subpopulations.
 - e. United We Ride. www.unitedweride.gov. United We Ride is an interagency Federal national initiative that supports States and their localities in developing coordinated human service delivery systems originating from the Office of Program Management or the Federal Transit Administration. In addition to State coordination grants, United We Ride provides State and local agencies a transportation-coordination and planning self-assessment tool, help along the way, technical assistance, and other resources to help their communities succeed.
2. Technical Assistance Products. Recipients and subrecipients are encouraged to review information on the following technical assistance products. Interested parties can access

these products through the relevant website or by contacting FTA's Office of Civil Rights.

- a. "How to Engage Low-Literacy and Limited English Proficient Populations in Transportation Decision-making." <http://www.fhwa.dot.gov/hep/lowlim/>. This report documents "best practices" in identifying and engaging low-literacy and limited-English- proficiency populations in transportation decision-making. These "best practices" were collected during telephone interviews with individuals in 30 States.
- b. "Disaster Response and Recovery Resource for Transit Agencies" <http://transit-safety.volpe.dot.gov/Publications/order/singledoc.asp?docid=437>. This resource provides local transit agencies and transportation providers with useful information and best practices in emergency preparedness and disaster response and recovery, including information on how to respond to the needs of low-income persons, Limited English Proficient persons, persons with disabilities, and older adults.

Attachment H: Title VI Analyses Completed Since 2022 Submittal



Title VI Fare Increase Analysis:

Office of Inclusion, Diversity, Equity, and Accessibility

April 21, 2023

Executive Summary

The TriMet Board of Directors asked TriMet staff to formalize a fare increase proposal. The first reading of the fare increase proposal will be at the Board's April 26, 2023 meeting, and the Board will vote on the increase at its May 24, 2023 meeting. If approved, this would be TriMet's first fare increase in more than 10 years, and the fare increase would take effect Jan. 1, 2024.

As part of the Title VI Analysis TriMet conducted a public engagement campaign about the fare increase proposal. The engagement campaign ran from Dec. 8, 2022 through Feb. 25, 2023.

Over the course of the outreach and engagement efforts TriMet staff partnered with 66 community based organizations to get the word out about the fare increase proposal and to create spaces to gather feedback. The outreach included in-person, online, and partner led community events.

By working with community TriMet was able to provide outreach across the following languages; Arabic, Burmese, Cambodian, Chinese, Farsi, Filipino, Japanese, Korean, Napoli, Rohingya, Russian, Somali, Spanish, Swahili, Taiwanese, Ukrainian, and Vietnamese. In addition to in-person and online open houses TriMet was able to use a variety of social media and survey tools to gather feedback, including Facebook ads in English and Spanish, LinkedIn, Instagram, Twitter, as well as TriMet & Equity on the Move email newsletters. In total, the events allowed TriMet and partner staff to interact with over 1,550 community members and the surveys gathered almost 5,700 responses.

Staff used the feedback and information gathered from the surveys and open houses, Transit Equity Advisory Committee (TEAC), the Committee on Accessible Transportation (CAT) and TriMet Board Meetings, and TriMet's policy on Fare Changes to help Inform the Title VI Analysis conducted by Espousal Strategies LLC.

Espousal Strategies' analysis found that TriMet's proposed fare increase constituted an approximate 12% increase in fares. TriMet's Fare Policy (updated in 2019) sets a threshold of 10% for Disparate Impact and 10% for Disproportionate Burden. The proposed fare increase would therefore result in both a **disparate impact** on minority riders and a **disproportionate burden** on low-income riders.

To reduce and minimize these impacts, TriMet staff have proposed a series of Mitigations that they will enact in collaboration with community partners to ensure even more riders can benefit from the savings available through the reduced fare program. They will also keep current monthly Fare caps in place across all youth, adult, honored citizen, and paratransit pass programs to ensure that riders who reach their monthly fare cap do not see an increase in the cost of their monthly fares.

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Title VI Equity Analysis

Proposed 2024 TriMet Fare Increase

April 2023



Prepared for TriMet by Espousal Strategies, LLC

Overview

The TriMet Board of Directors is considering fare increases that would take effect in January 2024. This document provides an equity analysis of the fare increase proposal, consistent with the Federal Transit Administration (FTA) Title VI Circular 4702.1B¹ and TriMet’s Title VI Program².

Title VI of the Civil Rights Act of 1964 states, “No person in the United States shall, on the ground 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.”

Background

TriMet’s fares have remained at the same level since 2012. The fare change under consideration would raise fares as shown in Table 1. To summarize, the price of both 2½-Hour tickets and 1-Day passes would increase 12% for all rider types, while monthly and annual pass prices would remain at their current levels.

Table 1: TriMet current fares and proposed changes that would take effect in January 2024

Fare	Fare Type	Current Price	Proposed New Price	Proposed Increase (\$)	Proposed Increase (%)
2.5-hour Ticket	Adult	\$2.50	\$2.80	\$0.30	12%
	Honored Citizen	\$1.25	\$1.40	\$0.15	12%
	Youth	\$1.25	\$1.40	\$0.15	12%
1-Day Pass (fare cap)	Adult	\$5.00	\$5.60	\$0.60	12%
	Honored Citizen	\$2.50	\$2.80	\$0.30	12%
	Youth	\$2.50	\$2.80	\$0.30	12%
Month Pass (fare cap)	Adult	\$100	No increase proposed		
	Honored Citizen	\$28			
	Youth	\$28			
Annual Pass	Adult	\$1,100	No increase proposed		
	Honored Citizen	\$308			
	Youth	\$308			

The FTA Title VI Circular requires transit providers considering fare changes to analyze whether potential impacts would adversely and disproportionately affect minority³ and/or low-income

¹ https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf

² <https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf>

³ While “people of color” is generally a more appropriate term than “minority”, this document uses “minority” for consistency with the language of the FTA Title VI Circular.

riders. If they do, it is considered a “disparate impact” for minority riders and a “disproportionate burden” on low-income riders.

TriMet’s Title VI Program implements these requirements by establishing a policy to determine whether the structure of a fare change would cause a potential disparate impact and/or disproportionate burden:

*“For fare changes, a potential disparate impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-minority riders. When minority populations or riders will experience **a 10% (or more) greater adverse effect** than that borne by the non-minority populations or riders, such changes will be considered to have a disparate impact.”*

The disproportionate burden policy is identical but applicable to low- and higher- income riders or populations rather than minority or non-minority, respectively.

Methodology

Data used for this equity analysis came from two sources: the 2022 Planning Future Transit survey and the 2022/23 Fare Increase Proposal survey. Basic information about these surveys is provided in Table 2 and the full text of each is in Attachments A and B.

Table 2: Surveys used for this analysis

Source	Date conducted	Type	Total responses	Minority responses	Low-income responses
Planning Future Transit Survey	March 2022	Online	5,093	1,414 (32%)	1,339 (33%)
Fare Increase Proposal Survey	Dec. 2022 – Feb. 2023	Online	5,688	1,379 (27%)	1,246 (24%)

Note that not all respondents to surveys answered questions about race and income, so percentages are among those who did.

The relevant data from the 2022 Planning Future Transit survey comes from responses to two questions:

- Q9: How often have you been riding TriMet in the last 12 months? Options:
 - Frequent (I rode almost every day)
 - Regular (I rode several times a week)
 - Occasional (I rode several times a month)
 - Infrequent (I rode less than once a month)
- Q13: How do you typically pay your fare?

The relevant data from the 2022/23 Fare Increase Proposal Survey comes from responses to two questions:

- Q3: How would the proposed fare increase affect you?
- Q4: Would you take fewer trips on TriMet due to the proposed fare increase?

The analysis combines findings from both surveys to estimate the *proportion* of minority and low-income riders who are adversely affected (as compared to non-minority and higher-income counterparts), and the *degree* of these impacts.

Rider categories

Riders will experience different impacts depending on how often they ride and how they pay their fare. They fall into four categories as shown in Table 3; the disparate impact and disproportionate burden analyses use these categories as a framework.

Table 3: Rider categories created for this analysis

Rider category	Estimated Impact
Cash or credit users (Riders paying cash, bank card, or mobile wallet for single 2½-hour or 1-Day tickets, including HOP paper tickets)	Highest These riders would see a 12% increase in monthly transportation costs, and do not benefit from monthly fare caps.
Hop users who ride <i>less-than-frequently</i> (As reported in the Planning Future Transit survey)	Second highest These riders would see a 12% increase in monthly transportation costs. Some may get close enough to the monthly cap to decide to take additional trips to reach it.
Hop users who ride <i>frequently</i> (As reported in the Planning Future Transit survey)	Little-to-none Monthly transportation costs would not increase for these riders. They may be impacted by needing to spend the full monthly amount in fewer days.
Other fare payers (i.e., Employer Pass, School ID)	None

Caveat

Survey data in general has inherent limitations in terms of analyzing the impacts people may experience from the proposed increase. TriMet’s community engagement efforts are therefore critical to better understanding potential impacts and developing effective strategies to avoid, minimize, or mitigate disparities.

Disparate Impact Analysis

The disparate impact analysis examines whether minority riders would be adversely affected to a greater degree than non-minority riders, as a whole. It contains two types of analysis corresponding to the two surveys.

Part 1: Rider Typology Analysis

As shown in Table 4, the share of minority riders who pay using a method besides Hop is 13 percentage points greater than the share of non-minority riders who do so. **This exceeds the 10% threshold established by TriMet's disparate impact policy.**

Table 4: Cross-tabulation of rider categories with minority and non-minority trips

Rider category	Level of impact	Pct. of Minority Riders	Pct. of Non-minority Riders	Difference (Minority minus Non-minority)	10% threshold met?
Cash or credit users	Highest	39%	26%	+13%	Yes
Hop users who ride less-than-frequently	Second highest	33%	50%	-17%	No
Hop users who ride frequently	Little-to-none	11%	10%	1%	No
Other fare users	None	17%	14%	-3%	No

Source: TriMet 2022 Planning Future Transit survey

Part 2: Self-reported Impacts

Overall, 74% of respondents to the 2022/23 Fare Increase Proposal Survey said the fare increase would have an impact, including 39% who said that impact would be large. And just over half (54%) of respondents said they would take fewer trips.

Table 5 shows how responses differed between minority and non-minority riders. Minority riders were more likely to expect to be impacted and to report planning to take fewer trips because of the fare increase. The share of minority riders expecting a *large* impact is 47%, compared to 35% of non-minority riders, **exceeding the 10% threshold established by TriMet's disparate impact policy**.

Table 5: Comparison of responses to Q3 and Q4 of the 2022/23 Fare Increase Survey

	Minority riders	Non-minority riders	Difference (Minority minus Non-minority)	10% threshold met?
Expecting fare increase to have an impact	77%	73%	+4%	No
Expecting fare increase to have a <i>large</i> impact	47%	35%	+12%	Yes
Would take fewer trips due to fare increase	58%	53%	+5%	No

Finding

The proposed fare increase would have a disparate impact on minority riders, as indicated by the following:

1. Minority riders represent a disproportionate share of those who will be most impacted by the increase, i.e., those who pay their fare using a method besides Hop.
2. A greater share of minority riders expect the fare increase to have a large impact than non-minority riders.

Disproportionate Burden Analysis

The disproportionate burden analysis examines whether low-income riders would be adversely affected to a greater degree than higher-income riders, as whole. It contains two types of analysis corresponding to the two surveys.

Part 1: Rider Category Analysis

As shown in Table 6Table 4, the share of low-income riders who pay using a method besides Hop is 9 percentage points greater than the share of higher-income riders who do so. **While this difference does indicate a potential disparity, it does not meet the 10% threshold established by TriMet’s disproportionate burden policy.**

Table 6: Cross-tabulation of rider categories with low- and higher- income riders

Rider typology	Level of impact	Pct. of Low-income Riders	Pct. of Higher-income Riders	Difference (Low-income minus Higher-income)	10% threshold met?
Cash or credit users	Highest	34%	25%	+9%	No
Hop users who ride less-than-frequently	Second highest	16%	8%	+8%	No
Hop users who ride frequently	Little-to-none	41%	44%	-3%	No
Other fare users	None	7%	19%	-12%	N/A (no impact)

Source: TriMet 2022 Planning Future Transit survey

Part 2: Self-reported Impacts

Overall, 74% of respondents to the 2022/23 Fare Increase Proposal Survey said the fare increase would have an impact, including 39% who said that impact would be large. And just over half (54%) of respondents said they would take fewer trips.

Table 7 shows how responses differed between low- and higher-income riders. Low-income riders were more likely to expect to be impacted and to report planning to take fewer trips because of the fare increase. Nearly three in five low-income riders surveyed are expecting a *large* impact.

All differences meet the 10% threshold established by TriMet's disproportionate burden policy.

Table 7: Comparison of responses to Q3 and Q4 of the 2022/23 Fare Increase Survey

Response to relevant survey questions	Low-income riders	Higher-income riders	Difference (Low-income minus higher-income)	10% threshold met?
Expecting fare increase to have an impact	84%	70%	+14%	Yes
Expecting fare increase to have a <i>large</i> impact	57%	32%	+25%	Yes
Would take fewer trips due to fare increase	63%	52%	+11%	Yes

Finding

The proposed fare increase would place a disproportionate burden on low-income riders, as indicated by the following:

1. Low-income riders expect to be impacted more than higher-income riders (including taking fewer trips) to a degree that exceeds TriMet's disproportionate burden threshold.

Addressing Disparate Impacts and Disproportionate Burdens

Monthly fare caps remaining at their current levels and the existence of the Low-income Fare program are crucial mitigating factors for the potential impacts a fare increase may have. Even so, if the TriMet Board approves the proposed fare increase, the findings of this analysis call for additional efforts to avoid, minimize, or mitigate impacts.

To avoid the impacts identified in this analysis, TriMet would need to choose not to move forward with the fare increase. Further analysis would need to be conducted to determine how service may be affected due to potential revenue shortfalls. That is, if deciding against the fare increase causes future reductions in service, this could have a significant impact on minority and low-income riders – whether this impact results in a disparate impact and/or disproportionate burden would depend on the nature of the service reductions.

Options to minimize impacts may include:

- Reducing the amount of the fare increase
- Boosting awareness of fare capping to encourage riders not currently using Hop to make the transition
- Distribution of pre-loaded cards
- Increased outreach and partnership with community-based organizations
- Advertisements through media likely to reach communities of color
- Other initiatives that the agency has found to be successful in increasing Hop adoption

Mitigation measures should leverage TriMet’s reduced and free fare programs. In addition to seniors, people with disabilities, and youth, TriMet offers the Honored Citizen fare to riders who verify that their household income is below 200% of the federal poverty level (FPL)⁴. Current enrollment in the program is over 50,000, and 43% of those who have provided demographic information are people of color⁵. This aligns with the 44% of Planning Future Transit respondents who were both people of color and below 200% FPL, and is greater than the share of Fare Increase Proposal survey respondents who fell into both demographics (36%).

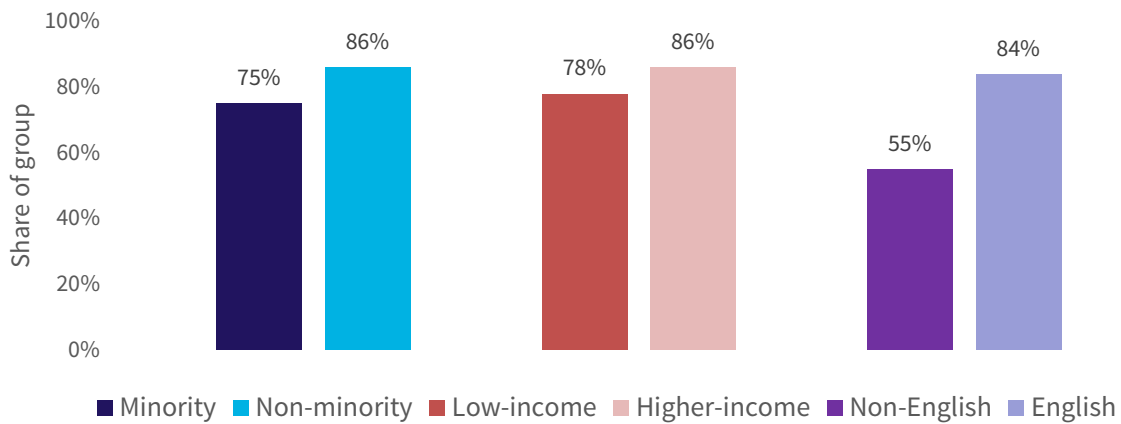
In other words, enrollment in the Low-income Fare program appears to reflect (or exceed) what would be expected given the makeup of TriMet riders, in terms of income levels and minority status.

At the same time, as demonstrated by results of the 2022/23 Fare Increase Proposal Survey, awareness of the program differs by demographic group: as a subset of minority, low-income, respondents who took the survey in a language besides English were less familiar with the program than their counterparts (see Figure 1).

⁴ TriMet’s Title VI definition of low-income is at or below 150% of the federal poverty level. Eligibility for the Low-income Fare was set at a higher income threshold in recognition of the region’s high cost of living.

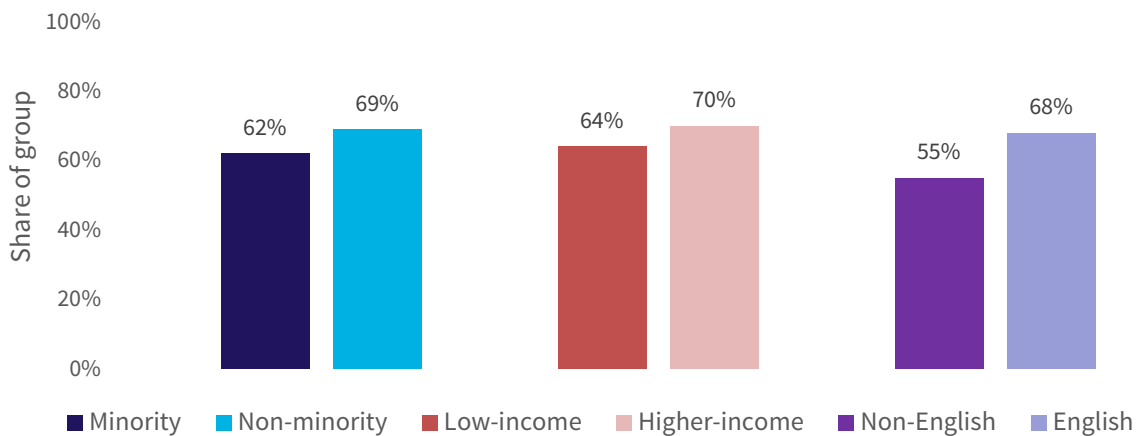
⁵ Among those who voluntarily provided demographic information.

Figure 1: Pct. Aware of Reduced Fares
2022/23 Fare Increase Proposal Survey



A similar pattern exists related to awareness of TriMet's Fare Assistance and Fare Relief programs that provide free and discounted fares to non-profits and community organizations (see Figure 2).

Figure 2: Pct. Aware of Free and Reduced Fare Programs
2022/23 Fare Increase Proposal Survey



Increasing enrollment in and access to these programs would help reduce disparities identified by this analysis and TriMet's related community engagement efforts

TriMet Proposed Mitigations

Current programs and resources

Fare Assistance – Reduced Fares

- TriMet understands a fare increase may be challenging for those on low and limited incomes. That's why TriMet offers reduced fares to qualifying riders, and partners with nonprofits and community-based organizations to get free fares to people who are struggling financially. Learn more at trimet.org/reduced.
- TriMet's **Honored Citizen** program provides reduced fares for seniors, those with disabilities and those who earn a low income. Learn more at trimet.org/reduced.
 - Honored Citizen Riders pay half the cost of an adult fare (2½ -Hour Ticket and Day Pass) and receive a 72% discount off the cost of an adult monthly pass.
 - Currently, for frequent Honored Citizen riders who use Hop Fastpass™ and ride five days a week using day passes, Hop's monthly fare capping means they pay just 70 cents a day for the calendar month (\$28 a month divided by 40 boardings per month = \$0.70 per trip).
 - Riders who qualify for the Honored Citizen program based on their income receive a free month of rides when they register for the program or re-enroll annually. The program is open to those who participate in an assistance program or whose household income is less than double the federal poverty level. Learn more at trimet.org/income.
- TriMet's **Access Transit programs** partner with eligible community-based organizations to distribute fares to those needing help and social services. Since 2015, TriMet has provided those community partners with more than \$12.2 million in fares.
 - The **Fare Assistance** program provides CBOs and nonprofits fares at a reduced cost. Learn more at trimet.org/accesstransit/assistance
 - The **Fare Relief** Program provides CBOs and nonprofits grants of up to \$25,000 in the form of free fares. Learn more at trimet.org/accesstransit/relief
 - **High School Access Transit** programs provide high schools free and discounted fares to distribute to low income youth, including a summer youth pass. Learn more at trimet.org/accesstransit/highschool.
 - **Fares for Seniors, People with Disabilities and Veterans (Pilot)** provides up to \$20,000 in fares to eligible organizations.
- TriMet's youth fare for those ages 7 through 17 is half the cost of an adult fare. Youth age 6 and under ride free with an accompanying adult.

- **Budgeted Funds for Access Transit/Reduced Fares*:**

	FY23 Budget (million)	FY 24 & 25 Projected (million)
AT: Fare Assistance & Fare Relief programs	\$2.1	\$2.7
AT: Seniors, People with disabilities, Veterans-pilot	\$0.15	\$0.15
AT: School Pass Program	\$0.5	\$0.92
AT: Summer Student Pass Program	\$3.3	\$2.9
LIF: Reduced fare based on income	\$16	\$23
LIF: Free month for new enrollees, re-enrolling	\$1.5	\$1.2
Total	\$23.55	\$30.87

**All of these funds are allocated to low income riders, meaning there is no access to these funds for riders who earn a middle or high income.*

Formal Proposed Mitigations

If the TriMet Board votes to move forward on the proposed fare increase, TriMet staff will work with its partners to ensure the following mitigations are put in place.

1. *No increase in the cost of monthly passes or fare caps for any of fare groups including Honored Citizen (reduced fare), Youth, or Adult.*
2. *Continue to provide a 50% discount for LIFT paratransit rides → half the cost of the federally-approved designated rate.*
3. *Expand access and registration for the Honored Citizen reduced fare.*
4. *Extend program registration for new and renewing participants to 3 years.*
5. *Work to expand the Hop retail network.*



Title VI Service Equity Analysis: May 2023 Service Change

April 7, 2023

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I. Executive Summary

TriMet is proposing to implement several service changes May 2023. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts a Service Equity Analysis to ensure that minority and low-income populations are not unfairly impacted any time Major Service Changes are proposed. The May 2023 service change include Major Service Changes for two bus lines, which require an analysis prior to action by the TriMet Board of Directors.

A. Methodology

TriMet's Title VI Program outlines the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies and Equity Analyses. TriMet analyzes Major Service Changes for potential adverse effects and distribution of benefits based on race/ethnicity or income at the individual line-level and system-level.

B. Major Service Changes

The proposed changes to two lines meet TriMet's thresholds for Major Service Changes:

Line 17-Holgate/Broadway

Line 70-12th/NE 33rd Ave

C. Findings

1. There is a **potential line level disparate impact** for one Major Service Improvement
2. There are **no system-level disparate impacts or disproportionate burdens** for the Major Service Improvements
3. **Minority and low-income populations will not benefit substantially less** from the Major Service Improvements than non-minority and higher income populations.

II. Background

TriMet proposes major service change to two bus lines to begin implementing the Forward Together Service Concept focused on ridership and improving connections to destinations for people with low and limited incomes. Other changes proposed for May 2023 do not meet the Major Service Change threshold to be reviewed in this analysis.

This report documents the equity analysis conducted for the major service changes.

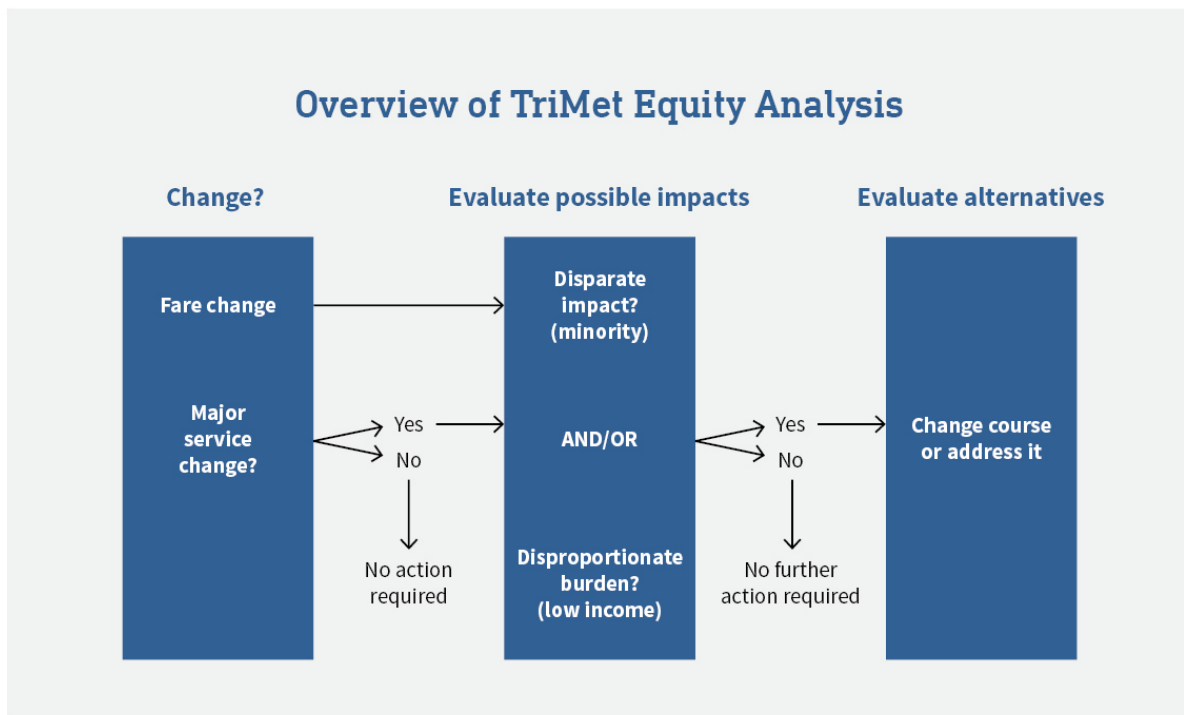
III. TriMet Title VI Compliance

As a recipient of Federal Transit Administration (“FTA”) financial assistance, TriMet must ensure that service changes – both improvements and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

“No person in the United States shall, on the ground 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.”

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). The Circular instructs transit agencies to consider impacts of Major Service Changes on low-income populations and minority populations by conducting a service equity analysis. Figure 1 shows the general sequence of steps and considerations in the equity analysis process.

Figure 1: Overview of TriMet's Title VI Equity Analysis process



TriMet’s Title VI Program outlines the agency’s policies, definitions and procedures for complying with Title VI and performing equity analyses. As required by the Circular, this includes the agency’s Major Service Change, Disparate Impact, and Disproportionate Burden policies, outlined below.

A. Major Service Change Policy

Any service change that meets the Major Service Change threshold is subject to a Title VI Equity Analysis prior to Board approval. The completed Title VI Equity Analysis must be presented to the Board for consideration and included in the subsequent TriMet Title VI Program with a record of action taken by the Board.

A **Major Service Change** is:

1. A change to **15% or more of a line's route miles**. This includes routing changes where route miles are neither increased nor reduced (i.e. re-routes), or;
2. A change of **15% or more to a line's span** of service on a daily basis for the day of the week for which a change is made, as measured by revenue hours, or;
3. A change of **15% or more to a line's frequency** of service on a daily basis for the day of the week for which a change is made, as measured by revenue hours, or;
4. A single transit line is **split** into two or more transit lines,
5. A transit line is retired or eliminated from service, or;
6. A **new transit line** is established.

A Major Service Change occurs whether the above thresholds are met:

- a) Within a single service proposal, or;
- b) Due to a cumulative effect of routing, span, or frequency changes over the three years prior to the analysis

B. Disparate Impact Policy

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. "Minority" is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

In the course of performing a Title VI Equity Analysis for possible disparate impact, TriMet will analyze how the proposed major service change or fare change action could impact minority populations, as compared to non-minority populations.

In the event the proposed action has an adverse impact that affects protected populations more than other populations at a level that exceeds the benchmarks established in the adopted Disparate Impact Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disparate Impact. Given a potential Disparate Impact, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disparate Impact Policy defines measures for determination of potential Disparate Impact on minority populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes. Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (hours, days, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of disparate impact associated with service changes is defined separately for impacts of changes on an individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements.

1. In the event of potential adverse effects resulting from service reductions:
 - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 35 percent compared to 32 percent).
 - b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.
2. In the event of service improvements:
 - a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
 - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
 - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 29 percent compared to 32 percent).
 - b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.
3. Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, or health care for minority populations.

Upon determination of Disparate Impact, TriMet will either:

- a) Alter the service proposal to avoid, minimize, or mitigate potential Disparate Impacts, or;

- b) Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less Disparate Impact on minority riders but would still accomplish the project or program goals.

C. Disproportionate Burden Policy

Testing for Disproportionate Burden evaluates potential effects on low-income riders or populations, defined as at or below 150% of the federal poverty level. The line and system level evaluations are identical to those used to determine potential Disparate Impacts, but compare low-income and higher income populations rather than minority and non-minority populations.

IV. Proposed Service Changes

A. Description of Changes

Table 1 lists the proposed changes by the type of service change:

Table 1: Proposed Service Changes in FY2024 Annual Service Plan

Line	Service Change Description
Line 17-Holgate/Broadway	➤ Increase frequency and span on the SE Holgate segment of Line 17.
Line 70-12th/NE 33rd Ave	➤ Route change to SE Ladd, 21 st , Milwaukie, & 17th

B. Major Service Change Test

To determine whether individual service changes meet the definition of Major Service Change, current and proposed route length and/or revenue hours are compared. Changes of 15% or more qualify as Major Service Changes, including changes meeting this threshold cumulatively over three years.

Results of the comparison are shown in Table 2:

Table 2: Results of Major Service Change Test By Line

Line	Route Change/Route Length Change	Frequency/Span Change	Line Split	Eliminate Line	New Line or Service
Line 17		+15%			
Line 70	+15%				

C. Line-level Analyses

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each line individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations).

Both service reductions and service improvements are analyzed. For service improvements, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations.

The line-level analysis compares minority and low-income populations within ¼ mile buffers of bus stops on each line proposed for a Major Service Change to the minority and low-income populations of the TriMet District as a whole. The analysis is separated by type of service change being proposed:

1. **Major Service Reduction**
2. **Major Service Improvements**
3. **Other Major Service Changes**

1. **Major Service Reduction**

For service reductions, the analysis examines whether *adverse effects* are disproportionately borne by minority or low-income populations. If *adverse effects* are identified and a line's minority and/or low-income populations are at least 3 percentage points greater than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

The May 2023 service change includes **one Major Service Reduction** for the Line 70, due to the proposed Route Change that "Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations" as outlined in the Disparate Impact Policy.

The results of the line-level potential Disparate Impact and Disproportionate Burden analyses shown in Tables 3 & 4:

Table 3: Potential Line-Level Major Service Reduction Disparate Impact Analysis

A Major Service Reduction to a single line will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 35 percent compared to 32 percent).				
Percent minority population for entire TriMet District: 32.0%				
Line	Total Line Population	Minority Population	Percent Minority Population	Single Line Disparate Impact (>=35.0%)
70	15,642	2,795	17.9%	NO
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: 2017-2021 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40				

Table 4: Potential Line-Level Major Service Reduction Disproportionate Burden Analysis

A Major Service Reduction to a single line will be considered to have a potential Disproportionate Burden if the percentage of impacted low-income population in the service area of the line exceeds the percentage of low-income population of the TriMet District as a whole by at least 3 percentage points (e.g., 19.8 percent compared to 16.8 percent).				
Percent population earning below 150% federal poverty level for the entire TriMet service district: 16.8%				
Line	Total Line Population	Population Below 150% FPL	Percent Population Below 150% FPL	Single Line Disproportionate Burdens (>=19.8%)
70	15,538	2,589	16.7%	NO
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 2017-2021 5Y Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42				

2. Major Service Improvements

For service improvements, the analysis examines whether *benefits* are inclusive of minority and low-income populations. If *benefits* are identified and a line's minority and/or low-income populations are at least 3 percentage points less than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

The May 2023 service change includes **two Major Service Improvements** for the Line 17 Increase in Frequency/Span and for the Line 70 Route Change that added service to new areas.

The results of the line-level potential Disparate Impact and Disproportionate Burden analyses shown in Tables 5 & 6:

Table 5: Potential Line-Level Major Service Improvement Disparate Impact Analysis

A Major Service Improvement to a single line will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area are at least 3 percentage points less than the minority populations for the TriMet District as a whole (e.g., 29 percent compared to 32 percent).				
Percent minority population for entire TriMet District: 32.0%				
Line	Total Line Population	Minority Population	Percent Minority Population	Single Line Disparate Impact (<=29.0%)
17	71,271	20,861	29.3%	No
70	20,127	4,680	23.2%	Yes
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: 2017-2021 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40				

Table 6: Potential Line-Level Major Service Improvement Disproportionate Burden Analysis

A Major Service Improvement to a single line will be considered to have a potential Disproportionate Burden if the percentage of impacted low-income population in the service area are at least 3 percentage points less than the low-income populations for the TriMet District as a whole (e.g., 13.8 percent compared to 16.8 percent).				
Percent population earning below 150% federal poverty level for the entire TriMet service district: 16.8%				
Line	Total Population	Population Below 150% FPL	Percent 150% Below FPL Population	Single Line Disproportionate Burdens (<=13.8%)
17	67,864	14,691	21.6%	NO
70	19,787	3,439	17.4%	No
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 2017-2021 5-Year Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42				

➤ **Line 70** (Route length change)

This change would increase service for a population that is below the Disparate Impact threshold (29%) for Major Service Improvements. This indicates a **potential Disparate Impact**, calling for further examination in the system-level analysis section

3. Other Major Service Changes

There are no Other Major Service Changes.

D. System-level Analysis

Because more than one line is proposed for a Major Service Change, a system-level analysis is required in addition to the line-level analysis. The system-level analysis aims to measure impacts of all Major Service Changes combined to determine how equitable the impacts would be across racial/ethnic and

economic lines. Service increases and service reductions are analyzed separately in order to examine both potential system-level *adverse effects* and distribution of *benefits*.

➤ ***System-level Disparate Impact Analysis: Major Service Improvements***

The system-level Disparate Impact analysis of Major Service Increases is completed by determining what portion of the TriMet District's minority population stands to benefit from the Major Service Change improvements, and comparing that to the portion of the District's non-minority population that potentially benefits. A potential Disparate Impact would exist if minority populations benefitted substantially less than non-minority populations. The way we measure this is to test whether 20% less (or 4/5) of the District's minority than non-minority population stood to benefit from the improvements.

Table 7 compares the impacted minority and non-minority populations:

Table 7: System-Level Major Service Improvements Disparate Impact Analysis

Population Category	District-Wide Population	May 2023 Service Improvement Impacted Population	Percent Impacted Population	System-wide Disparate Impact (Minority Pop Percentage <= 4.7%)
Minority	528,988	25,541	4.8%	NO
Non-Minority	1,121,634	65,858	5.9%	
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: 2017-2021 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40				

A higher percentage of the District's non-minority population (5.9%) stands to benefit from the proposed Major Service Improvements, compared to the minority population (4.8%). However, this is not less than the minority population disparate impact threshold (4.7%). Therefore, a ***system-level Disparate Impact is not found for the proposed Major Service Improvements.***

➤ ***System-level Disproportionate Burden Analysis: Major Service Improvements***

The System-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District's low-income population is positively impacted by the Major Service Increases, and comparing that to the District's higher income population that is positively impacted. "Higher income" includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations benefitted substantially less than higher income populations. The way we measure this is to test whether 20% less (or 4/5) of the District's low-income than higher income population stands to benefit from the improvements.

Table 8 compares the impacted low-income and higher income populations:

Table 8: System-Level Major Service Improvements Disproportionate Burden Analysis

Population Category	District-Wide Population	FY2024 Service Improvement Impacted Population	Percent Impacted Population	System-Wide Disproportionate Burden (Low-Income Pop Percentage <=4.1%)
Below 150% of FPL	273,937	18,130	6.6%	NO
Above 150% of FPL	1,355,683	69,521	5.1%	
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 2017-2021 5-Year Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=43				

A higher percentage of the District's low-income population stands to benefit from the proposed Major Service Improvements (6.6%) compared to the higher income population (5.1%). Therefore, a ***system-level Disproportionate Burden is not found for the proposed Major Service Improvements.***

Because only one line is proposed for a Major Service Reduction, a system-level analysis is not required.

V. Community Engagement

TriMet staff conducted two rounds of public outreach, which resulted in over 5,000 comments being submitted.

The first outreach process occurred in September – October 2022 and requested public comment on all the service changes in the Forward Together Service Concept. Staff made information available on trimet.org/forward, included a survey in eight languages via an online language translation tool, advertised to the community through social media (Facebook and Twitter) and handouts translated into eight languages (English, Spanish, Korean, Vietnamese, Chinese, Ukrainian, Russian, and Somali). The survey was also advertised to TriMet's Riders Club via email, to customers at transit centers via e-readers at the stops with QR codes, and employees via ExpressLine, the online employee newsletter. The survey received 4,597 responses, of which 124 were completed in a language other than English. In addition to the online outreach, TriMet staff conducted six in-person open house meetings and one virtual open house meeting. All of the open houses featured some non-English language translation depending on where they were located.

The second outreach process occurred in January – February 2023 and requested comment on the specific service changes in the Forward Together Service Concepts proposed to be implemented in the FY2024 Annual Service Plan. Staff made information available on trimet.org/plan and through eleven in-person open house meetings and six virtual events. All in-person events featured some non-English language translation depending on location. The proposed changes and open houses were also advertised on KATU, KGW, KOIN, Fox News, and in newspapers such as the Oregonian, Willamette Week, and the Statesman Journal. TriMet also promoted the service changes on social media (Facebook and Twitter). Visitors to the webpage submitted 1,115 comments.

The following is a summary of themes across the feedback received for Line 70:

- Reliability – Riders supported the change to avoid the rail crossing that led to lengthy and unpredictable delays
- Access to Schools – Riders supported the change to bring serve closer to Cleveland High School
- Route Change – Riders shared support and concern about the route change that impact travel time and ability to access destinations

The Line 17-Broadway/Holgate changes were included in the Sept.-Oct. public process for Forward Together Service Concept, but not the Jan.-Feb. public process for the FY24 Service Changes. This is because the Line 17-Holgate service changes weren't in the original proposal for the FY24 Service Changes. However, they were added in response to feedback received regarding the Line 70-12th/NE33rd service changes shared with the community during the public process for the FY24 changes. As a result, the Line 17 service changes were added as a mitigation to an issue raised during the community engagement for Line 70. Community outreach will occur prior to implantation of the change in May 2023.

VI. Summary of Findings

Table 9 summarizes the results of the line-level Disparate Impact and Disproportionate Burden analyses:

Table 9: Summary of Disparate Impact and Disproportionate Burden Analysis Results

		Potential Disparate Impact?	Potential Disproportionate Burden?
Major Service Reductions	Line 70-12th/NE 33rd Ave	No	No
	Combined Reductions (System-level)	N/A	N/A
Major Service Improvements	Line 17-Holgate/Broadway	No	No
	Line 70-12th/NE 33rd Ave	Yes	No
	Combined Improvements (System-level)	No	No
Other Major Service Changes		-	-

While potential a disparate impact was identified for the Major Service Improvement on Lines 70, TriMet staff recommend making the route length change to improve school access to schools and address reliability issues due to the rail crossing.

Since no system-level disparate impact or disproportionate burden were found for the Major Service Improvements, the service area's minority and low-income populations will not benefit substantially less from the improvements than non-minority and higher income populations.



Title VI Service Equity Analysis: FY2024 Annual Service Plan

March 7, 2023

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I. Executive Summary

TriMet is proposing to implement several service changes in fall 2023 through spring 2024. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts a Service Equity Analysis to ensure that minority and low-income populations are not unfairly impacted any time Major Service Changes are proposed. The FY2024 Annual Service Plan includes Major Service Changes to 19 bus lines, which require an analysis prior to action by the TriMet Board of Directors.

A. Methodology

TriMet's Title VI Program outlines the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies and Equity Analyses. TriMet analyzes Major Service Changes for potential adverse effects and distribution of benefits based on race/ethnicity or income at the individual line-level and system-level.

B. Major Service Changes

The proposed changes to 19 lines meet TriMet's thresholds for Major Service Changes:

- Line 19-Woodstock/Glisan
- Line 35-Macadam/Greeley
- Line 36-South Shore
- Line 39-Arnold Creek/Hillsdale
- Line 43-Taylor's Ferry Rd/Marquam Hill
- Line 48-Cornell
- Line 51-Vista/Sunset Blvd
- Line 52-Farmington/185th
- Line 54-Beaverton-Hillsdale Hwy
- Line 55-Hamilton
- Line 56-Scholls Ferry Rd/Marquam Hill
- Line 61-Marquam Hill/Beaverton
- Line 64-Marquam Hill/Tigard
- Line 65-Marquam Hill/Barbur Blvd
- Line 66-Marquam Hill/Hollywood
- Line 68-Marquam Hill/Collins Circle
- Line 77-Broadway/Halsey
- Line 87-Airport Way/181st
- Line 94-Tigard/Sherwood

C. Findings

1. There are **potential line level disparate impacts** for 6 Major Service Improvements
2. There are **potential line level disproportionate burdens** for 1 Major Service Improvement and 2 Major Service Reductions

3. There are **no system-level disparate impacts or disproportionate burdens** for the Major Service Improvements or Major Service Reductions
4. A **greater share of the region's minority and low-income populations stand to benefit** from the Major Service Improvements compared to non-minority and higher income populations.
5. A **smaller share of the region's minority and low-income populations stand to be impacted** by the Major Service Reductions compared to non-minority and higher-income populations

II. Background

TriMet's Annual Service Plan for FY2024 (July 1, 2023 – June 30, 2024) proposes major service changes to 19 bus lines to begin implementing the Forward Together Service Concept focused on ridership and improving connections to destinations for people with low and limited incomes. Other changes proposed for FY2024 do not meet the Major Service Change threshold to be reviewed in this analysis.

This report documents the equity analysis conducted for the major service changes.

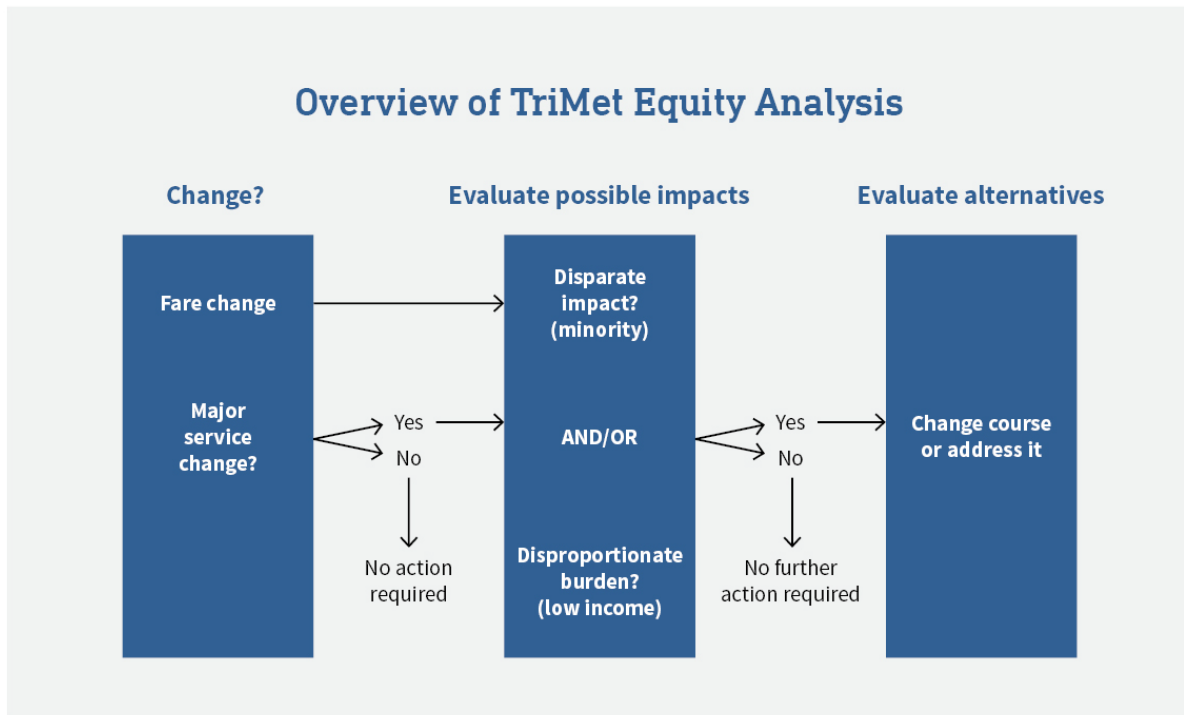
III. TriMet Title VI Compliance

As a recipient of Federal Transit Administration ("FTA") financial assistance, TriMet must ensure that service changes – both improvements and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

"No person in the United States shall, on the ground 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."

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B ("Circular"). The Circular instructs transit agencies to consider impacts of Major Service Changes on low-income populations and minority populations by conducting a service equity analysis. Figure 1 shows the general sequence of steps and considerations in the equity analysis process.

Figure 1: Overview of TriMet's Title VI Equity Analysis process



TriMet's Title VI Program outlines the agency's policies, definitions and procedures for complying with Title VI and performing equity analyses. As required by the Circular, this includes the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, outlined below.

A. Major Service Change Policy

Any service change that meets the Major Service Change threshold is subject to a Title VI Equity Analysis prior to Board approval. The completed Title VI Equity Analysis must be presented to the Board for consideration and included in the subsequent TriMet Title VI Program with a record of action taken by the Board.

A **Major Service Change** is:

1. A change to **15% or more of a line's route miles**. This includes routing changes where route miles are neither increased nor reduced (i.e. re-routes), or;
2. A change of **15% or more to a line's span** of service on a daily basis for the day of the week for which a change is made, as measured by revenue hours, or;
3. A change of **15% or more to a line's frequency** of service on a daily basis for the day of the week for which a change is made, as measured by revenue hours, or;

4. A single transit line is **split** into two or more transit lines,
5. A transit line is retired or eliminated from service, or;
6. A **new transit line** is established.

A Major Service Change occurs whether the above thresholds are met:

- a) Within a single service proposal, or;
- b) Due to a cumulative effect of routing, span, or frequency changes over the three years prior to the analysis

B. Disparate Impact Policy

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. “Minority” is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

In the course of performing a Title VI Equity Analysis for possible disparate impact, TriMet will analyze how the proposed major service change or fare change action could impact minority populations, as compared to non-minority populations.

In the event the proposed action has an adverse impact that affects protected populations more than other populations at a level that exceeds the benchmarks established in the adopted Disparate Impact Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disparate Impact. Given a potential Disparate Impact, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disparate Impact Policy defines measures for determination of potential Disparate Impact on minority populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes. Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (hours, days, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of disparate impact associated with service changes is defined separately for impacts of changes on an individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements.

1. In the event of potential adverse effects resulting from service reductions:
 - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 35 percent compared to 32 percent).

- b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.
2. In the event of service improvements:
- a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
 - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
 - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 29 percent compared to 32 percent).
 - b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.
3. Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, or health care for minority populations.

Upon determination of Disparate Impact, TriMet will either:

- a) Alter the service proposal to avoid, minimize, or mitigate potential Disparate Impacts, or;
- b) Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less Disparate Impact on minority riders but would still accomplish the project or program goals.

C. Disproportionate Burden Policy

Testing for Disproportionate Burden evaluates potential effects on low-income riders or populations, defined as at or below 150% of the federal poverty level. The line and system level evaluations are identical to those used to determine potential Disparate Impacts, but compare low-income and higher income populations rather than minority and non-minority populations.

IV. Proposed Service Changes

A. Description of Changes

Table 1 lists the proposed changes by the type of service change:

Table 1: Proposed Service Changes in FY2024 Annual Service Plan

Line	Service Change Description
Line 51-Vista/Sunset Blvd	➤ Increase route length
Line 94-Tigard/Sherwood	➤ Decrease route length
Line 19-Woodstock/Glisan Line 35-Macadam/Greeley Line 43-Taylor's Ferry Rd/Marquam Hill Line 48-Cornell Line 52-Farmington/185 th Line 54-Beaverton-Hillsdale Hwy Line 56-Scholls Ferry Rd/Marquam Hill Line 77-Broadway/Halsey Line 87-Airport Way/181 st	➤ Increase frequency and span
Line 39-Arnold Creek/Hillsdale	➤ Reduce frequency and span
Line 36-South Shore Line 55-Hamilton Line 61-Marquam Hill/Beaverton Line 64-Marquam Hill/Tigard Line 65-Marquam Hill/Barbur Blvd Line 66-Marquam Hill/Hollywood Line 68-Marquam Hill/Collins Circle	➤ Eliminate line

Note: The FY2024 Annual Service Plan also included minor changes to several bus lines (44, 62, 99) that are not included in this analysis because they do not meet the Major Service Change threshold.

B. Major Service Change Test

To determine whether individual service changes meet the definition of Major Service Change, current and proposed route length and/or revenue hours are compared. Changes of 15% or more qualify as Major Service Changes, including changes meeting this threshold cumulatively over three years.

Results of the comparison are shown in Table 2:

Table 2: Results of Major Service Change Test By Line

Line	Route Length Change	Frequency/Span Change	Line Split	Eliminate Line	New Line or Service
Line 19		+15%			
Line 35		+15%			
Line 36				X	
Line 39		-15%			
Line 43		+15%			
Line 48		+15%			
Line 51	+15%				
Line 52		+15%			
Line 54		+15%			
Line 55				X	
Line 56		+15%			
Line 61				X	
Line 64				X	
Line 65				X	
Line 66				X	
Line 68				X	
Line 77		+15%			
Line 87		+15%			
Line 94	-15%				

C. Line-level Analyses

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each line individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations).

Both service reductions and service improvements are analyzed. For service improvements, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations.

The line-level analysis compares minority and low-income populations within ¼ mile buffers of bus stops on each line proposed for a Major Service Change to the minority and low-income populations of the TriMet District as a whole. The analysis is separated by type of service change being proposed:

1. Major Service Reduction
2. Major Service Improvements
3. Other Major Service Changes

1. Major Service Reduction

For service reductions, the analysis examines whether *adverse effects* are disproportionately borne by minority or low-income populations. If *adverse effects* are identified and a line's minority and/or low-income populations are at least 3 percentage points greater than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

The FY2024 Annual Service Plan includes **nine Major Service Reductions** and the results of the line-level potential Disparate Impact and Disproportionate Burden analyses shown in Tables 3 & 4:

Table 3: Potential Line-Level Major Service Reduction Disparate Impact Analysis

A Major Service Reduction to a single line will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 35 percent compared to 32 percent).				
Percent minority population for entire TriMet District: 32.0%				
Line	Total Line Population	Minority Population	Percent Minority Population	Single Line Disparate Impact (>=35.0%)
36	36,919	9,819	26.6%	NO
39	15,401	3,410	22.1%	NO
55	28,281	6,942	24.5%	NO
61	8,417	2,144	25.5%	NO
64	11,255	3,080	27.4%	NO

65	9,192	1,798	19.6%	NO
66	21,866	4,888	22.4%	NO
68	17,164	5,390	31.4%	NO
94	17,477	4,779	27.3%	NO
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: 2017-2021 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40				

Table 4: Potential Line-Level Major Service Reduction Disproportionate Burden Analysis

A Major Service Reduction to a single line will be considered to have a potential Disproportionate Burden if the percentage of impacted low-income population in the service area of the line exceeds the percentage of low-income population of the TriMet District as a whole by at least 3 percentage points (e.g., 19.8 percent compared to 16.8 percent).				
Percent population earning below 150% federal poverty level for the entire TriMet service district: 16.8%				
Line	Total Line Population	Population Below 150% FPL	Percent Population Below 150% FPL	Single Line Disproportionate Burdens (>=19.8%)
36	34,219	6,386	18.7%	NO
39	15,089	1,686	11.2%	NO
55	27,187	6,211	22.8%	YES
61	8,333	1,372	16.5%	NO
64	11,197	1,593	14.2%	NO
65	9,124	1,120	12.3%	NO
66	21,657	3,409	15.7%	NO
68	15,056	4,824	32.0%	YES
94	17,298	3,139	18.1%	NO
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 2017-2021 5Y Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42				

➤ **Lines 55, 68 (Eliminate)**

These changes would eliminate service for populations that are above the Disproportionate Burden threshold (16.8%) for Major Service Reductions. This indicates **potential Disproportionate Burdens**, calling for further examination in the system-level analysis section

2. Major Service Improvements

For service improvements, the analysis examines whether *benefits* are inclusive of minority and low-income populations. If *benefits* are identified and a line's minority and/or low-income populations are at least 3 percentage points less than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

The FY2024 Annual Service Plan includes **10 Major Service Improvements** and the results of the line-level potential Disparate Impact and Disproportionate Burden analyses shown in Tables 5 & 6:

Table 5: Potential Line-Level Major Service Improvement Disparate Impact Analysis

A Major Service Improvement to a single line will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area are at least 3 percentage points less than the minority populations for the TriMet District as a whole (e.g., 29 percent compared to 32 percent).				
Percent minority population for entire TriMet District: 32.0%				
Line	Total Line Population	Minority Population	Percent Minority Population	Single Line Disparate Impact (<=29.0%)
19	63,327	17,456	27.6%	YES
35	58,502	15,613	26.7%	YES
43	25,436	5,933	23.3%	YES
48	30,902	13,283	43.0%	NO
51	20,145	4,527	22.5%	YES
52	33,236	15,733	47.3%	NO
54	32,848	9,370	28.5%	YES
56	20,287	4,965	24.5%	YES
77	69,840	21,650	31.0%	NO
87	22,269	10,888	48.9%	NO
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: 2017-2021 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40				

➤ **Lines 19, 35, 43, 54, 56** (Increase frequency and span)

These changes would increase service for populations that are below the Disparate Impact threshold (29%) for Major Service Improvements. This indicates **potential Disparate Impacts**, calling for further examination in the system-level analysis section

➤ **Line 51** (Increase route length)

This change would increase service for a population that is below the Disparate Impact threshold (29%) for Major Service Improvements. This indicates a **potential Disparate Impact**, calling for further examination in the system-level analysis section

Table 6: Potential Line-Level Major Service Improvement Disproportionate Burden Analysis

A Major Service Improvement to a single line will be considered to have a potential Disproportionate Burden if the percentage of impacted low-income population in the service area are at least 3 percentage points less than the low-income populations for the TriMet District as a whole (e.g., 13.8 percent compared to 16.8 percent).

Percent population earning below 150% federal poverty level for the entire TriMet service district: 16.8%

Line	Total Population	Population Below 150% FPL	Percent 150% Below FPL Population	Single Line Disproportionate Burdens (<=13.8%)
19	60,023	13,053	21.7%	NO
35	54,967	10,830	19.7%	NO
43	25,287	3,316	13.1%	YES
48	30,570	5,203	17.0%	NO
51	20,118	3,797	18.9%	NO
52	33,033	6,767	20.5%	NO
54	30,333	7,350	24.2%	NO
56	19,993	2,990	15.0%	NO
77	69,074	15,388	22.3%	NO
87	21,923	7,811	35.6%	NO

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 2017-2021 5-Year Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data)

<https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42>

➤ **Line 43** (Increase frequency and span)

This change would increase service for a population that is below the Disproportionate Burden threshold (13.8%) for Major Service Improvements. This indicates a **potential Disparate Impact**, calling for further examination in the system-level analysis section

3. Other Major Service Changes

There are no Other Major Service Changes.

D. System-level Analysis

Because more than one line is proposed for a Major Service Change, a system-level analysis is required in addition to the line-level analysis. The system-level analysis aims to measure impacts of all Major Service Changes combined to determine how equitable the impacts would be across racial/ethnic and economic lines. Service increases and service reductions are analyzed separately in order to examine both potential system-level *adverse effects* and distribution of *benefits*.

➤ **System-level Disparate Impact Analysis: Major Service Improvements**

The system-level Disparate Impact analysis of Major Service Increases is completed by determining what portion of the TriMet District's minority population stands to benefit from the Major Service Change improvements, and comparing that to the portion of the District's non-minority population that potentially benefits. A potential Disparate Impact would exist if minority populations benefitted substantially less than non-minority populations. The way we measure this is to test whether 20% less (or 4/5) of the District's minority than non-minority population stood to benefit from the improvements.

Table 7 compares the impacted minority and non-minority populations:

Table 7: System-Level Major Service Improvements Disparate Impact Analysis

Population Category	District-Wide Population	FY2024 Service Improvement Impacted Population	Percent Impacted Population	System-wide Disparate Impact (Minority Pop Percentage <= 14.9%)
Minority	528,988	99,981	18.9%	NO
Non-Minority	1,121,634	209,084	18.6%	
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: 2017-2021 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40				

A higher percentage of the District's minority population (18.9%) stands to benefit from the proposed Major Service Improvements, compared to the non-minority population (18.6%). Therefore, a ***system-level Disparate Impact is not found for the proposed Major Service Improvements.***

➤ **System-level Disproportionate Burden Analysis: Major Service Improvements**

The System-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District's low-income population is positively impacted by the Major Service Increases, and comparing that to the District's higher income population that is positively impacted. "Higher income" includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations benefitted substantially less than higher income populations. The way we measure this is to test whether 20% less (or 4/5) of the District's low-income than higher income population stands to benefit from the improvements.

Table 8 compares the impacted low-income and higher income populations:

Table 8: System-Level Major Service Improvements Disproportionate Burden Analysis

Population Category	District-Wide Population	FY2024 Service Improvement Impacted Population	Percent Impacted Population	System-Wide Disproportionate Burden (Low-Income Pop Percentage <=14.3%)
Below 150% of FPL	273,937	59,972	21.9%	NO
Above 150% of FPL	1,355,683	242,724	17.9%	
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 2017-2021 5-Year Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=43				

A higher percentage of the District's low-income population stands to benefit from the proposed Major Service Improvements (21.9%) compared to the higher income population (17.9%). Therefore, a ***system-level Disproportionate Burden is not found for the proposed Major Service Improvements.***

➤ ***System-level Disparate Impact Analysis: Major Service Reductions***

The system-level Disparate Impact analysis of Major Service Reductions is completed by determining what proportion of the TriMet District's minority population is potentially adversely impacted from the service reductions and comparing that to the District's non-minority population that may be adversely impacted. A potential Disparate Impact would exist if minority populations were impacted substantially more by service reductions than non-minority populations. The way we measure this is to test whether 20% more of the District's minority than non-minority population were impacted by the service reductions.

Table 9 compares the impacted minority and non-minority populations:

Table 9: System-Level Disparate Impact Analysis

Population Category	District-Wide Population	FY2024 Service Reduction Impacted Population	Percent Impacted Population	System-wide Disparate Impact (Minority Pop Percentage >= 9.1%)
Minority	528,988	28,938	5.5%	NO
Non-Minority	1,121,634	85,357	7.6%	
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: 2017-2021 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40				

A lower percentage of the District's minority population (5.5%) is negatively impacted by the proposed Major Service Reductions, compared to the non-minority population (7.6%). Therefore, a ***system-level Disparate Impact is not found for the proposed Major Service Reductions.***

➤ ***System-level Disproportionate Burden Analysis: Major Service Reductions***

The system-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District's low-income population is potentially adversely impacted from the service reductions and comparing that to the District's higher income population that may be adversely impacted. "Higher income" includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations were impacted substantially more by service reductions than higher income populations. The way we measure this is to test whether 20% more of the District's low-income than higher income population were impacted by the service reductions.

Table 10 compares the impacted low-income and higher income populations:

Table 10: System-Level Disproportionate Burden Analysis

Population Category	District-Wide Population	FY2024 Service Reduction Impacted Population	Percent Impacted Population	System-Wide Disproportionate Burden (Low-Income Pop Percentage >=9.2%)
Below 150% of FPL	273,937	18,840	6.9%	NO
Above 150% of FPL	1,355,683	91,915	6.8%	
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=43				

A higher percentage of the District's low-income population stands to be negatively impacted by the proposed Major Service Reductions (6.9%) compared to the higher income population (6.8%). However, this does not exceed the low-income population disproportionate burden threshold (9.2%). Therefore, a ***system-level Disproportionate Burden is not found for the proposed Major Service Reductions.***

V. Community Engagement

TriMet staff conducted two rounds of public outreach, which resulted in over 5,000 comments being submitted.

The first outreach process occurred in September – October 2022 and requested public comment on all the service changes in the Forward Together Service Concept. Staff made information available on trimet.org/forward, included a survey in eight languages via an online language translation tool, advertised to the community through social media (Facebook and Twitter) and handouts translated into eight languages (English, Spanish, Korean, Vietnamese, Chinese, Ukrainian, Russian, and Somali). The survey was also advertised to TriMet's Riders Club via email, to customers at transit centers via e-readers at the stops with QR codes, and employees via ExpressLine, the online employee newsletter. The survey received 4,597 responses, of which 124 were completed in a language other than English. In addition to the online outreach, TriMet staff conducted six in-person open house meetings and one virtual open house meeting. All of the open houses featured some non-English language translation depending on where they were located.

The second outreach process occurred in January – February 2023 and requested comment on the specific service changes in the Forward Together Service Concepts proposed to be implemented in the FY2024 Annual Service Plan. Staff made information available on trimet.org/plan and through eleven in-person open house meetings and six virtual events. All in-person events featured some non-English language translation depending on location. The proposed changes and open houses were also advertised on KATU, KGW, KOIN, Fox News, and in newspapers such as the Oregonian, Willamette Week, and the Statesman Journal. TriMet also promoted the service changes on social media (Facebook and Twitter). Visitors to the webpage submitted 1,115 comments.

The following is a summary of themes across the feedback received:

- Service Upgrades – Riders supported increased frequency and span on both the proposed Frequent Service Routes and on routes, which had service cut in response to COVID-19 and the operator shortage

- Route Changes – Riders shared support and concern about route changes on multiple routes that impact travel time and ability to access destinations
- Access to businesses – Riders requested early morning and late evening span to reach job sites at the beginning and end of shifts
- Elimination – Some riders expressed concern about elimination of low-ridership and express routes, while others acknowledged decreased demand following COVID-19 travel changes

VI. Summary of Findings

Table 11 summarizes the results of the line-level and system-level Disparate Impact and Disproportionate Burden analyses:

Table 11: Summary of Disparate Impact and Disproportionate Burden Analysis Results

		Potential Disparate Impact?	Potential Disproportionate Burden?
Major Service Reductions	Line 36-South Shore	No	No
	Line 39-Arnold Creek/Hillsdale	No	No
	Line 55-Hamilton	No	Yes
	Line 61-Marquam Hill/Beaverton	No	No
	Line 64-Marquam Hill/Tigard	No	No
	Line 65-Marquam Hill/Barbur Blvd	No	No
	Line 66-Marquam Hill/Hollywood	No	No
	Line 68-Marquam Hill/Collins Circle	No	Yes
	Line 94-Tigard/Sherwood	No	No
	Combined Reductions (System-level)	No	No
Major Service Improvements	Line 19-Woodstock/Glisan	Yes	No
	Line 35-Macadam/Greeley	Yes	No
	Line 43-Taylor's Ferry Rd/Marquam Hill	Yes	Yes
	Line 48-Cornell	No	No
	Line 51-Vista/Sunset Blvd	Yes	No
	Line 52-Farmington/185 th	No	No

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Line 54-Beaverton-Hillsdale Hwy	Yes	No
Line 56-Scholls Ferry Rd/Marquam Hill	Yes	No
Line 77-Broadway/Halsey	No	No
Line 87-Airport Way/181 st	No	No
Combined Improvements (System-level)	No	No
Other Major Service Changes	-	-

While potential disparate impacts and disproportionate burdens were identified for Major Service Improvements on Lines 19, 35, 43, 51, 54, & 56, TriMet staff recommend improving service on these routes to improve access to major job destinations, schools, and address service reductions implemented due to COVID-19 and operator shortage. And while potential disproportionate burdens were identified for Major Service Reductions on Lines 55 and 68, staff recommend eliminating service on these routes due to low ridership and availability of nearby service.

Since no system-level disparate impact or disproportionate burden were found for the Major Service Reductions and Major Service Improvements, a greater share of minority and low-income populations stand to benefit from the improvements than non-minority and higher income populations and minority and low-income populations will not be impacted substantially more by the reductions than non-minority or higher income populations.



Title VI Service Equity Analysis: FY2025 Annual Service Plan

April 8, 2024

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I. Executive Summary

TriMet is proposing to implement several service changes in fall 2024 through spring 2025. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts a Service Equity Analysis to ensure that minority and low-income populations are not unfairly impacted any time Major Service Changes are proposed. The FY2025 Annual Service Plan includes Major Service Changes to 31 bus lines, which require an analysis prior to action by the TriMet Board of Directors.

A. Methodology

TriMet's Title VI Program outlines the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies and Equity Analyses. TriMet analyzes Major Service Changes for potential adverse effects and distribution of benefits based on race/ethnicity or income at the individual line-level and system-level.

B. Major Service Changes

The proposed changes to 31 lines meet TriMet's thresholds for Major Service Changes:

- Line 17-Holgate/Broadway
- Line 21-Sandy Blvd/223rd
- Line 24-Fremont/NW 18th
- Line 25-Glisan/Rockwood
- Line 29-Lake/Webster Rd
- Line 31-Webster Rd
- Line 32-Oatfield
- Line 33-McLoughlin/King Rd
- Line 34-Linwood/River Rd
- Line 40 (new route)
- Line 47-Main/Evergreen
- Line 52-Farmington/185th
- Line 55-Hamilton
- Line 67-Bethany/158th
- Line 70-12th/NE 33rd Ave
- Line 76-Hall/Greenburg
- Line 77-Broadway/Halsey
- Line 79-Clackamas/Oregon City
- Line 80-Kane/Troutdale Rd
- Line 81-Kane/257th
- Line 85-Swan Island
- Line 86 (new route)
- Line 87-Airport Way/181st
- Line 96-Tualatin/I-5
- Line 99-Macadam/McLoughlin
- Line 153 (new route)
- Line 154-Willamette/Clackamas Heights
- Line 291-Orange Night Bus

Blue Night Bus (new route)
Red Night Bus (new route)
Yellow Night Bus (new route)

C. Findings

1. There are **no system-level** disparate impacts or disproportionate burdens for the Major Service Improvements or Major Service Reductions
2. There are **16 potential line level** disparate impacts or disproportionate burdens for the Major Service Improvements and Major Service Reductions

II. Background

TriMet's Annual Service Plan for FY2025 (July 1, 2024 – June 30, 2025) proposes major service changes to 31 bus lines to continue implementing the Forward Together Service Concept focused on ridership and improving connections to destinations for people with low and limited incomes. Other changes proposed for FY2025 do not meet the Major Service Change threshold to be reviewed in this analysis.

This report documents the equity analysis conducted for the major service changes.

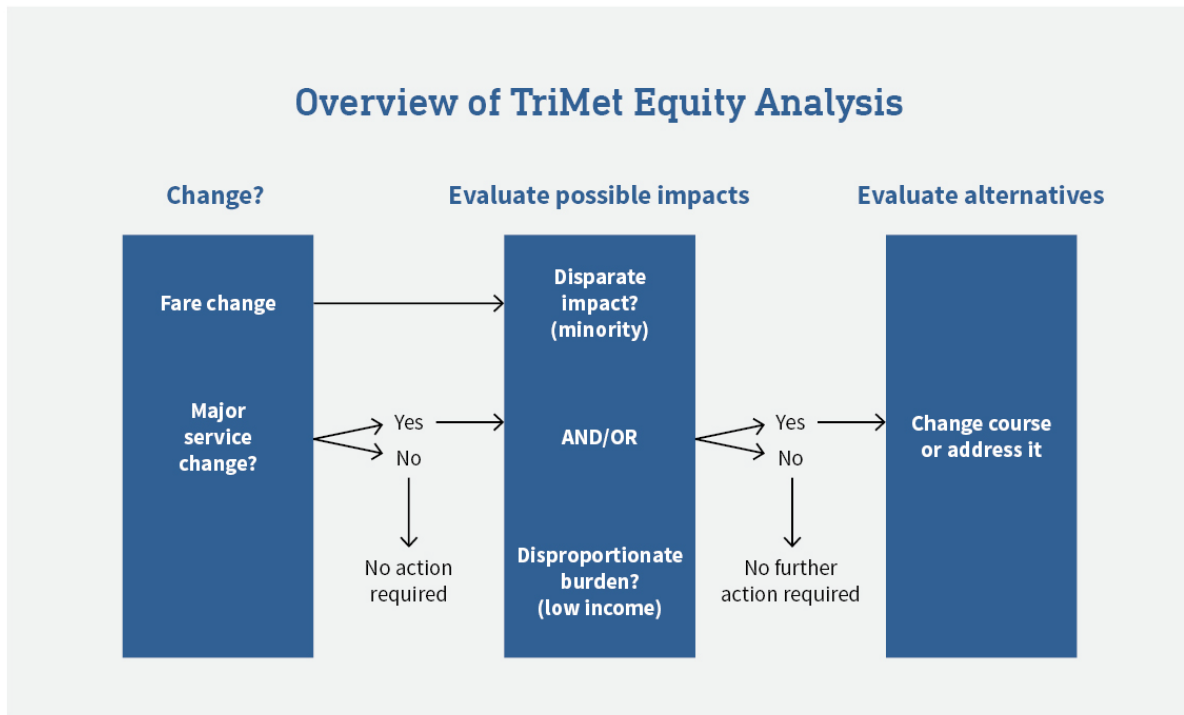
III. TriMet Title VI Compliance

As a recipient of Federal Transit Administration (“FTA”) financial assistance, TriMet must ensure that service changes – both improvements and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

“No person in the United States shall, on the ground 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.”

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). The Circular instructs transit agencies to consider impacts of Major Service Changes on low-income populations and minority populations by conducting a service equity analysis. Figure 1 shows the general sequence of steps and considerations in the equity analysis process.

Figure 1: Overview of TriMet's Title VI Equity Analysis process



TriMet's Title VI Program outlines the agency's policies, definitions and procedures for complying with Title VI and performing equity analyses. As required by the Circular, this includes the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, outlined below.

A. Major Service Change Policy

Any service change that meets the Major Service Change threshold is subject to a Title VI Equity Analysis prior to Board approval. The completed Title VI Equity Analysis must be presented to the Board for consideration and included in the subsequent TriMet Title VI Program with a record of action taken by the Board.

A **Major Service Change** is:

1. A change to **15% or more of a line's route miles**. This includes routing changes where route miles are neither increased nor reduced (i.e. re-routes), or;
2. A change of **15% or more to a line's span** of service on a daily basis for the day of the week for which a change is made, as measured by revenue hours, or;
3. A change of **15% or more to a line's frequency** of service on a daily basis for the day of the week for which a change is made, as measured by revenue hours, or;

4. A single transit line is **split** into two or more transit lines,
5. A transit line is retired or eliminated from service, or;
6. A **new transit line** is established.

A Major Service Change occurs whether the above thresholds are met:

- a) Within a single service proposal, or;
- b) Due to a cumulative effect of routing, span, or frequency changes over the three years prior to the analysis

B. Disparate Impact Policy

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. “Minority” is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

In the course of performing a Title VI Equity Analysis for possible disparate impact, TriMet will analyze how the proposed major service change or fare change action could impact minority populations, as compared to non-minority populations.

In the event the proposed action has an adverse impact that affects protected populations more than other populations at a level that exceeds the benchmarks established in the adopted Disparate Impact Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disparate Impact. Given a potential Disparate Impact, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disparate Impact Policy defines measures for determination of potential Disparate Impact on minority populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes. Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (hours, days, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of disparate impact associated with service changes is defined separately for impacts of changes on an individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements.

1. In the event of potential adverse effects resulting from service reductions:
 - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 35 percent compared to 32 percent).

- b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.
2. In the event of service improvements:
- a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
 - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
 - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 29 percent compared to 32 percent).
 - b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.
3. Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, or health care for minority populations.

Upon determination of Disparate Impact, TriMet will either:

- a) Alter the service proposal to avoid, minimize, or mitigate potential Disparate Impacts, or;
- b) Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less Disparate Impact on minority riders but would still accomplish the project or program goals.

C. Disproportionate Burden Policy

Testing for Disproportionate Burden evaluates potential effects on low-income riders or populations, defined as at or below 150% of the federal poverty level. The line and system level evaluations are identical to those used to determine potential Disparate Impacts, but compare low-income and higher income populations rather than minority and non-minority populations.

IV. Proposed Service Changes

A. Major Service Change Test

To evaluate whether individual service changes meet the definition of Major Service Change, the criteria in III.A. are applied to the proposals, comparing current and proposed route length and/or revenue hours as appropriate.

Results of the evaluation are shown in Table 1:

Table 1: Results of Major Service Change Test By Line

Line	Route Length Change	Frequency/Span Change	Merge Lines	Split Line	Eliminate Line	New Line or Service
Line 17		>15%				
Line 21			X			
Line 24			X		X	
Line 25		>15%				
Line 29		>15%				
Line 31		>15%				
Line 32	>15%					
Line 33	>15%					
Line 34		>15%				
Line 40						X
Line 47		>15%				
Line 52		>15%				
Line 55						X
Line 67		>15%				
Line 70		>15%				
Line 76	>15%					
Line 77		>15%				
Line 79		>15%				
Line 80			X			

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Line 81			X			
Line 85					X	
Line 86						X
Line 87		>15%				
Line 96	>15%					
Line 99					X	
Line 153						X
Line 154					X	
Line 291	>15%					
Blue Night Bus						X
Red Night Bus						X
Yellow Night Bus						X

Note: The FY2025 Annual Service Plan also included minor change to several bus and MAX lines (8, Blue, Green, Orange, Red, Yellow) that are not included in this analysis because they do not meet the Major Service Change threshold.

B. Line-level Analyses

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each line individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations).

Both service reductions and service improvements are analyzed. For service improvements, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations.

The line-level analysis compares minority and low-income populations within ¼ mile buffers of bus stops on each line proposed for a Major Service Change to the minority and low-income populations of the TriMet District as a whole. The analysis is separated by type of service change being proposed:

1. Major Service Reduction
2. Major Service Improvements
3. Other Major Service Changes

1. Major Service Reduction

For service reductions, the analysis examines whether *adverse effects* are disproportionately borne by minority or low-income populations. If *adverse effects* are identified and a line's minority and/or low-income populations are at least 3 percentage points greater than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

The FY2025 Annual Service Plan includes **five Major Service Reductions** and the results of the line-level potential Disparate Impact and Disproportionate Burden analyses shown in Tables 2 & 3:

Table 2: Potential Line-Level Major Service Reduction Disparate Impact Analysis

Minority Single Line Disparate Impact - Service Reduction				
A Major Service Change to a single line will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 32 percent compared to 29 percent).				
Percent minority population for entire TriMet District:			32.80%	
Disparate Impact by Line				
Line	Total Line Population	Minority Population	Percent Minority Population	Potential Disparate Impact
47	31,236	14,145	45.30%	YES
70	25,471	5,297	20.80%	NO
85	2,988	894	29.90%	NO
99	38,308	9,186	24.00%	NO
154	8,463	1,253	14.80%	NO
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40				

Table 3: Potential Line-Level Major Service Reduction Disproportionate Burden Analysis

Low-Income Single Line Disproportionate Burdens - Service Reduction				
A Major Service Change to a single line will be considered to have a potential Disproportionate Burden if the percentage of impacted low-income population in the service area of the line exceeds the percentage of low-income population of the TriMet District as a whole by at least 3 percentage points (e.g., 31 percent compared to 28 percent).				
Percent low-income population for the entire TriMet service district:			16.50%	
Disproportionate Burden by Line				
Line	Total Population	Low-Income Population	Percent Low-Income Population	Potential Disproportionate Burdens
47	31,236	5,026	16.30%	NO
70	25,244	4,724	18.70%	NO
85	2,535	552	21.80%	YES
99	35,791	8,891	24.80%	YES
154	8,463	1,253	14.80%	NO
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 5Y Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42				

➤ **Lines 47, 85, 99**

These changes would reduce service for populations that are above the Disparate Impact or Disproportionate Burden thresholds for Major Service Reductions. This indicates **three potential line level impacts**, calling for further examination in the system-level analysis section

2. Major Service Improvements

For service improvements, the analysis examines whether *benefits* are inclusive of minority and low-income populations. If *benefits* are identified and a line's minority and/or low-income populations are at least 3 percentage points less than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

The FY2025 Annual Service Plan includes **26 Major Service Improvements** and the results of the line-level potential Disparate Impact and Disproportionate Burden analyses are shown in Tables 4 & 5:

Table 4: Potential Line-Level Major Service Improvement Disparate Impact Analysis

Minority Single Line Disparate Impact - Service Improvement				
A major service change to a single line will be considered to have a potential Disparate Impact if: i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or; ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 26 percent compared to 29 percent).				
Percent minority population for entire TriMet District:				32.80%
Disparate Impact by Line				
Line	Total Line Population	Minority Population	Percent Minority Population	Potential Disparate Impact
17	68,601	20,714	30.20%	NO
21	22,724	11,995	52.80%	NO
24	59,960	21,574	36.00%	NO
25	33,302	14,599	43.80%	NO
29	15,838	3,729	23.50%	YES
31	20,057	3,927	19.60%	YES
32	18,196	3,186	17.50%	YES
33	38,559	8,619	22.40%	YES
34	32,744	6,841	20.90%	YES
40	33,683	9,268	27.50%	YES
52	34,493	16,684	48.40%	NO
55	27,804	6,988	25.10%	YES
67	17,566	7,695	43.80%	NO
76	30,395	11,849	39.00%	NO
77	70,240	23,053	32.80%	NO
79	12,536	3,172	25.30%	YES
80	19,132	6,251	32.70%	NO
81	18,833	6,169	32.80%	NO
87	21,613	10,148	47.00%	NO
95	26,727	12,134	45.40%	NO
96	44,664	12,287	27.50%	YES
153	16,021	3,167	19.80%	YES
291	24,190	6,576	27.20%	YES
Blue Night Bus	67,860	29,994	44.20%	NO
Red Night Bus	1,293	488	37.70%	NO
Yellow Night Bus	22,973	6,963	30.30%	NO

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race
<https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40>

Table 5: Potential Line-Level Major Service Improvement Disproportionate Burden Analysis

Low-Income Single Line Disproportionate Burdens - Service Improvement				
A major service change to a single line will be considered to have a potential Disproportionate Burden if: iii. The improvement is linked to other service changes that have disproportionate and adverse effects on low-income populations, or; iv. The percentage of impacted low-income population in the service area of the line is less than the percentage of low-income population of the TriMet District as a whole by at least 3 percentage points (e.g., 25 percent compared to 28 percent).				
Percent low-income population for the entire TriMet service district:				16.50%
Disproportionate Burden by Line				
Line	Total Population	Low-Income Population	Percent Pop. Low-Income	Potential Disproportionate Burden
17	65,112	14,183	21.80%	NO
21	22,452	6,837	30.50%	NO
24	59,558	12,395	20.80%	NO
25	33,001	9,559	29.00%	NO
29	15,659	2,959	18.90%	NO
31	19,479	3,612	18.50%	NO
32	18,064	3,237	17.90%	NO
33	37,973	8,295	21.80%	NO
34	32,400	6,989	21.60%	NO
40	30,870	8,134	26.30%	NO
52	34,283	7,281	21.20%	NO
55	26,970	5,750	21.30%	NO
67	17,463	1,433	8.20%	YES
76	30,226	5,664	18.70%	NO
77	69,466	16,049	23.10%	NO
79	12,260	3,181	25.90%	NO
80	18,885	5,174	27.40%	NO
81	18,604	5,285	28.40%	NO
86	26,312	7,210	27.40%	NO
87	21,293	7,242	34.00%	NO
96	43,518	7,640	17.60%	NO
153	15,922	1,298	8.20%	YES
291	21,990	6,379	29.00%	NO
Blue Night Bus	66,644	19,446	29.20%	NO

Red Night Bus	1,282	469	36.60%	NO
Yellow Night Bus	20,825	6,085	29.20%	NO
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 5Y Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42				

➤ ***Lines 29, 31, 32, 33, 34, 40, 55, 67, 79, 96, 152, 291***

These changes would increase service for populations that are below the Disparate Impact or Disproportionate Burden thresholds for Major Service Improvements. This indicates **13 potential Disparate Impacts**, calling for further examination in the system-level analysis section.

3. **Other Major Service Changes**

There are no Other Major Service Changes.

D. System-level Analysis

Because more than one line is proposed for a Major Service Change, a system-level analysis is required in addition to the line-level analysis. The system-level analysis aims to measure impacts of all Major Service Changes combined to determine how equitable the impacts would be across racial/ethnic and economic lines. Service increases and service reductions are analyzed separately in order to examine both potential system-level *adverse effects* and distribution of *benefits*.

➤ ***System-level Disparate Impact Analysis***

The system-level Disparate Impact analysis of Major Service Reductions is completed by determining what proportion of the TriMet District's minority population is potentially adversely impacted from the service reductions and comparing that to the District's non-minority population that may be adversely impacted. A potential Disparate Impact would exist if minority populations were impacted substantially more by service reductions than non-minority populations. The way we measure this is to test whether 20% more of the District's minority than non-minority population were impacted by the service reductions.

The system-level Disparate Impact analysis of Major Service Increases is completed by determining what portion of the TriMet District's minority population stands to benefit from the Major Service Change improvements, and comparing that to the portion of the District's non-minority population that potentially benefits. A potential Disparate Impact would exist if minority populations benefitted substantially less than non-minority populations. The way we measure this is to test whether 20% less (or 4/5) of the District's minority than non-minority population stood to benefit from the improvements.

➤ ***System-level Disproportionate Burden Analysis***

The system-level Disproportionate Burden analysis of Major Service Reductions is completed by determining what proportion of the TriMet District's low-income population is potentially adversely impacted from the service reductions and comparing that to the District's higher income population that may be adversely impacted. "Higher income" includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations

were impacted substantially more by service reductions than higher income populations. The way we measure this is to test whether 20% more of the District's low-income than higher income population were impacted by the service reductions.

The System-level Disproportionate Burden analysis of Major Service Increases is completed by determining what proportion of the TriMet District's low-income population is positively impacted by the Major Service Increases, and comparing that to the District's higher income population that is positively impacted. "Higher income" includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations benefitted substantially less than higher income populations. The way we measure this is to test whether 20% less (or 4/5) of the District's low-income than higher income population stands to benefit from the improvements.

Table 6 compares the impacted minority and non-minority and low-income and higher income populations:

Table 6: System-Level Major Disparate Impact and Disproportionate Analysis

	Information	Disparate Impact		Disproportionate Burden	
		Minority	Non-Minority	Below 150% FPL	Above 150% FPL
	District-Wide Population Totals	542,317	1,110,194	269,840	1,361,593
Service Reduction	Impacted Population	30,917	72,557	19,164	80,810
	Impacted Population Percentage	5.7%	6.5%	7.10%	5.93%
	Disparate Impact Equation	5.7% >= (6.5%+(6.5%*20%))		7.10% >= (5.93%+(5.93%*20%))	
	Disparate Impact Criteria	5.7% >= 7.8%		7.10% >= 7.12%	
	Potential Disparate Impact or Disproportionate Burden	NO		NO	
Service Improvement	Impacted Population	175,985	343,566	105,422	405,758
	Impacted Population Percentage	32.5%	30.9%	39.1%	29.8%
	Disparate Impact Equation	32.5% <= (30.9%-(30.9%*20%))		39.1% <= (29.8%-(29.8%*20%))	
	Disparate Impact Criteria	32.5% <= 24.8%		39.1% <= 23.8%	
	Potential Disparate Impact or Disproportionate Burden	No		NO	
Data Source: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 2018-2022 5Y Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) US Census American Community Survey Table: 2018-2022 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40					

A lower percentage of the District's minority population (5.7%) is negatively impacted by the proposed Major Service Reductions, compared to the non-minority population (6.5%). Additionally, a higher percentage of the District's minority population (32.5%) stands to benefit from the proposed Major Service Improvements, compared to the non-minority population (30.9%). Therefore, a **system-level Disparate Impact is not found** for the proposed Major Service Reductions or Improvements.

A higher percentage of the District's low-income population stands to be negatively impacted by the proposed Major Service Reductions (7.10%) compared to the higher income population (5.93%). However, this does not exceed the low-income population disproportionate burden threshold (7.12%). Additionally, a higher percentage of the District's low-income population stands to benefit from the proposed Major Service Improvements (39.1%) compared to the higher income population (29.8%). Therefore, a **system-level Disproportionate Burden is not found** for the proposed Major Service Reductions or Improvements.

V. Community Engagement

TriMet staffed conducts two rounds of public outreach, which resulted in over 2,500 comments being submitted.

The first outreach process occurred in September – November 2023 and requested public comment on a larger set of service changes than included in this report.

Staff made information available on trimet.org/plan, through public notices mailed to a ¼ mile range around the areas where service changes were proposed, postings at all bus stops that were proposed to either close or where a service change was recommended, and through eight open houses.

All of the open houses featured some non-English language translation depending on where they were located. Outreach was also conducted to communities with limited English proficiency via TriMet's multicultural outreach engagement contract. We identified the top 5 languages spoken per bus line as Spanish, Chinese, Vietnamese, Ukrainian, and Russian.

TriMet received over 1,700 comments from September 26 through November 21 via the website, open houses, emails, letters, direct conversations and calls to Customer Service.

The second outreach process occurred in January – February 2024 and requested comment on a smaller package of service changes for FY25. The service change package was reduced as a result of revised operator projections for FY24 and FY25. Additionally, some service changes were revised based on feedback from customers. Staff made information available on trimet.org/plan, through public notices mailed to a ¼ mile range around the areas where service changes were proposed, postings at all bus stops that were proposed to either close or where a service change was recommended, and through four open houses.

TriMet received over 1,000 comments from January 10th through February 16th via the website, open houses, emails, letters, and calls to Customer Service.

The following is a summary of themes across the feedback received:

- Service Upgrades – Riders supported increased frequency and span on both the proposed Frequent Service Routes and on routes.
- Route Changes – Riders shared support and concern about route changes on multiple routes that impact travel time and ability to access destinations
- Elimination – Some riders expressed concern about elimination of low-ridership and express routes, while others acknowledged decreased demand following COVID-19 travel changes

Additionally, TriMet received comments during the public hearing at the March 27 Board Meeting. TriMet staff assessed the feedback and determined it did not pertain to the Title VI populations impacted by the proposed service changes.

VI. Summary of Findings

1. There are **no system-level** disparate impacts or disproportionate burdens for the Major Service Improvements or Major Service Reductions

Therefore a **greater share of minority and low-income populations stand to benefit** from the improvements than non-minority and higher income populations and **minority and low-income populations will not be negatively impacted substantially more** by the reductions than non-minority or higher income populations.

2. There are **16 potential line level** disparate impacts or disproportionate burdens for the Major Service Reductions and Improvements

While potential disproportionate burdens were identified for Major Service Reductions on Lines 47, 85, 99, staff recommend **reducing service or eliminating these routes due to low ridership and availability of nearby service.**

And while potential disparate impacts and disproportionate burdens were identified for Major Service Improvements on Lines 29, 31, 32, 33, 34, 40, 55, 67, 79, 96, 152, 291, TriMet staff recommend **improving service on these routes to improve access to major job destinations, schools, and address previous service reductions** implemented due to COVID-19 and operator shortage.