



Title VI Fare Equity Analysis

*DART Free Fixed-Route for
Paratransit Eligible Riders*

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Background

In the Summer of 2022, the DART Commission directed staff to examine the paratransit service operated by DART and to explore if there was opportunity to better define the program parameters to control cost while still meeting customer needs.

In the Fall 2022, DART distributed a Paratransit Bus Plus customer satisfaction survey and hosted public input meetings to better understand the needs of paratransit users and get feedback on proposed changes to the program. Highlights of the survey responses include:

- ▶ Overall, current service users were comfortable with providing some form of medical verification during the eligibility process.
- ▶ Of those surveyed, fifty-four percent indicated it is easy to obtain a signed medical statement from a licensed medical professional.
- ▶ Forty-nine percent of those surveyed indicated they would utilize DART fixed route service for some of their trips if the service was free to use.
 - ▷ An additional sixteen percent indicated they would also utilize DART fixed route service for some of their trips if DART provided some form of fixed route training.

In January 2023 staff presented the survey and public input meetings findings to the DART Commission. Listed below, are the three items that were identified as improvements to implement regarding the Bus Plus program:

- ▶ Modifying the Bus Plus eligibility form to include medical verification
- ▶ Implementing a free fare for Bus Plus users on DART's fixed route
- ▶ Implementing a premium Bus Plus zone to allow customers to access locations beyond DART's Bus Plus service area, but within Polk County (fare aligned with Polk County Paratransit contract)

Proposed Changes

As part of the Bus Plus program updates, DART proposes offering free fare on fixed-route services for individuals who have been approved for DART ADA Bus Plus. The proposed change to the fare structure creates a new fare class for those who qualify and have been approved for DART paratransit service.

Public Outreach

As a part of the paratransit program review, staff lead public meetings, distributed surveys to receive comment on the program. Results of the feedback received in the Fall of 2022 included the following findings:

- 49% of paratransit customers would use fixed-route service for some of their travel, with another 19% interested in using fixed-route service if they were provided training on how to do so
- 81% of customers rated that they were either "very satisfied" or "satisfied" with DART paratransit service.
- Feedback included incentivizing using fixed-route services in lieu of paratransit as a way to reduce the growth in paratransit use.



Relevant Policies

Title VI of the Civil Rights Act of 1964 states that 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 Federal Transit Administration (FTA) has several requirements to ensure that transit agencies comply with Title VI, among them the requirement to analyze changes to transit service or fares to determine whether changes are being applied equitably to minority and low-income communities.

All changes to fare cost and payment methods are subject to this analysis and reporting, excluding temporary or promotional fares lasting 12 months or less.

DART's Disparate Impact Policy provides a threshold which identifies when adverse effects of a fare change are borne disproportionately by minority populations. DART will consider a proposed fare rate or media change to have a disparate impact if the proportion of minority customers likely to be negatively affected is more than 5 percentage points greater than the overall proportion of DART customers likely to be affected.

DART's Disproportionate Burden Policy provides a threshold which identifies when adverse effects of a fare change are borne disproportionately by low-income populations. DART will consider a proposed fare rate or media change to have a disproportionate burden if the proportion of low-income customers likely to be negatively affected is more than 5 percentage points greater than the overall proportion of DART customers likely to be affected.



Impact Analysis

In order to test whether the proposed changes would result in a disproportionate negative burden on minority or low-income population, DART staff collected available demographic information to compare the affected population to the regional population, as well as information about the proposed fare change. For this analysis, staff used the race and income information collected from the 2022 Customer Satisfaction Survey of Complementary ADA Bus Plus eligible customers. Staff compared paratransit customers to residents of the region as a whole using available Census data. Details on this analysis can be found in the Appendix.

Paratransit Participation

The following analysis compares the demographic make-up of paratransit customers compared to all DART customers and DART's service area as a whole.

	Low Income	Minority
Paratransit Customers	65%	14%
All DART Customers	52%	39%
DART Service Area	19%	30%

Fare Change Analysis

Current paratransit customers would be subject to the regular fixed route fare of \$1.75 per trip. The resulting fare change would be a 100% decrease from \$1.75 per trip to \$0.00. The following analysis focuses on the paratransit customer base as it relates to the region. Demographic data of the paratransit user group is derived from the 2022 Customer Service Satisfaction Survey.

The data indicates that a higher proportion of paratransit users are low-income when compared to customers of all DART services as well as the DART Service Area population as a whole.

Fare Type	Cost		Change		Demographics by Fare Type	
	Existing	Proposed	Absolute	Percentage	Low-income (Para)	Minority (Para)
Single Ride	\$1.75	\$0.00	(\$1.75)	-100%	65%	14%



Findings

DART's Disparate Impact Policy provides a threshold which identifies when adverse effects of a fare change are borne disproportionately by minority populations. DART finds that minority populations are not negatively impacted by reducing the fare and therefore does not exceed the 5 percentage points greater than the overall proportion of DART customers as outlined in the policy.

DART's Disproportionate Burden Policy provides a threshold which identifies when adverse effects of a fare change are borne disproportionately by low-income populations. DART finds the low-income population is not negatively affected and therefore does not exceed the 5 percentage points greater than the overall proportion of DART customers likely to be affected.

Justification and Mitigation Measures

Free fixed-route service is a benefit to all paratransit customers and will particularly benefit those who are low-income as the share of paratransit customers are significantly higher than the service area as a whole. Since the fare free trip would provide a relative benefit to minority and low-income riders, no mitigation is recommended for this fare policy change.

Conclusions

The intent of expanding access to the fixed-route services provided by DART is to encourage use of fixed-route for customers eligible for the complimentary paratransit service. The change will provide a cost-effective alternative for ADA eligible customers where fixed-route is available and will reduce the operating cost of providing ADA paratransit. The change in policy does not constitute a disproportionate burden on low-income individuals or a disparate impact on minority individuals.



Appendix

Title VI Analysis Data Sources and Definitions

Data from the American Community Survey (ACS), DART ridership reporting, and customer surveys were used to perform the Title VI analysis.

2017 ACS five-year estimates provided block-group-level population data for the existing network demographic analysis. For purposes of this analysis, the following origin by race categories were defined as minority:

- ▶ Black or African American alone
- ▶ American Indian or Alaska Native alone
- ▶ Asian alone
- ▶ Native Hawaiian or Other Pacific Islander alone
- ▶ Hispanic or Latino alone
- ▶ "Other" race alone
- ▶ Two or more races

Individuals who reported in the ACS that their income over the previous 12 months fell below the federal poverty line were defined as low-income for the geographic analysis.

For purposes of this analysis, the following origin by race categories were defined as minority as indicated on OTT application:

- | | |
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| ▶ African American | ▶ Black/ African American & Caucasian |
| ▶ American Indian/ Alaskan Native | ▶ Black/ African American & Hispanic/ Latino |
| ▶ American Indian/ Alaskan Native & Black African American | ▶ Hispanic |
| ▶ American Indian/ Alaskan Native & Caucasian | ▶ Native American |
| ▶ Asian | ▶ Native American/ Other Pacific Islander |
| ▶ Asian & Caucasian | ▶ Other |
| ▶ Black/ African American | ▶ Other Multi-Racial |
| | ▶ White Hispanic/ Latino |

Results from the 2018 DART Customer Satisfaction on-board survey informed the Title VI evaluation of whether proposed service changes created a potential for a disparate impact or disproportionate burden. Survey respondents were asked to identify their race or ethnicity from the following categories and could select all that applied:

- ▶ Caucasian/White
- ▶ African American/Black



- ▶ Hispanic/Latino
- ▶ Native American
- ▶ Asian/Pacific Islander
- ▶ Middle Eastern/North African
- ▶ Other

Respondents who selected any combination of answers other than only Caucasian/White were considered minority riders.

The customer satisfaction survey also asked respondents to provide their household income before taxes among the following income brackets:

- ▶ Less than \$10,000
- ▶ \$10,00 - \$14,999
- ▶ \$15,000 – \$24,999
- ▶ \$25,000 - \$34,999
- ▶ \$35,000 - \$49,999
- ▶ \$50,000 - \$74,999
- ▶ \$75,000 or More

DART utilizes the federal poverty guideline updated each year by the U.S. Department of Health and Human Services to define low-income populations. The survey data did not include information on respondents' household sizes. Assuming an average household size of four people, incomes under \$25,750 fall below the poverty guideline. Thus, all DART survey respondents who selected "Less than \$10,000," "\$10,000 - \$14,999," and "\$15,000 - \$24,999" were considered low- income for purposes of this analysis.

Table 1: 2019 Poverty Guideline for Determining Low-Income Status

HHS Poverty Guideline for 2019	
Household Size	Income
1	\$12,490
2	\$16,910
3	\$21,330
4	\$25,750
5	\$30,170
6	\$34,590
7	\$39,010
8	\$43,430

Source: U.S. Department of Health and Human Services, 2019.