

EXHIBIT "A"



Pittsburgh Regional Transit Title VI Fare Equity Analysis for the PRTner Pass - FINAL

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Prepared by NWC Partners, Inc.



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I. Executive Summary

In order to comply with guidance associated with the federal Civil Rights Act of 1964 and Port Authority of Allegheny County's Title VI Program adopted in accordance with FTA Circular 4702.1B, Port Authority of Allegheny County d/b/a Pittsburgh Regional Transit (PRT) must conduct a Fare Equity Analysis when contemplating fare policy and/or fare structure changes to ensure that the proposed changes would not result in either Disparate Impacts to minority riders or a Disproportionate Burden to low-income riders. The fare structure change recommendation to introduce the PRTner Pass, a universal pass program that was put out for public comment by PRT in the August to October 2024 timeframe is being presented by PRT management to PRT's Board in November 2024 for authorization to proceed with adoption and implementation of the PRTner Pass program is the basis of this Fare Equity Analysis. The PRTner Pass is a program designed to encourage ridership by allowing employers, multifamily property owners and managers, and schools to purchase passes for their employees, residents/tenants, and students at a deeply discounted rate on a rolling 12-month contract-basis.

The Average Fare Analysis, as further explained herein, did not find that the introduction of the PRTner Pass program would result in a Disparate Impact on minority riders or a Disproportionate Burden on low-income riders.

Given that there were no findings of Disparate Impact or Disproportionate Burden, no mitigations are needed to proceed with implementation of the PRTner Pass program.

II. Overview of the Proposed Fare Structure Changes

In 2023, PRT conducted a pilot to study the impacts of introducing a bulk pass/universal pass program. The pilot was funded by a grant from the Heinz Endowments. During the pilot, PRT worked with four designated employers across Allegheny County that were identified via an application process to distribute a total of 113 passes to their employees. Employees participating in the pilot completed pre- and post-pilot surveys, and their travel patterns were analyzed using PRT's Ready2Ride ticketing application. Initial results showed that the passes were highly valued, increased transit use, and influenced job choice. The participating employers were eager to continue the program beyond the pilot period. PRT's fare consultant reviewed the pilot findings and provided insight into similar programs at other transit agencies to help create a proposal to implement a permanent, universal pass program at PRT.

Based upon the pilot and subsequent analyses, PRT has proposed a permanent universal pass program that would be made available to employers, multifamily properties, and schools. The proposed name for the program is PRTner Pass™. It is anticipated to begin in the second half of PRT Fiscal Year 2025, pending final PRT Board approval. The program would be offered to secondary and post-secondary schools that are not eligible to participate in PRT's University Pass (U-Pass) Program, residential multifamily properties with 10 or more units in one physical location, and employers with 10 or more eligible employees. The PRTner Pass would be valid for unlimited use on PRT buses, light rail, and incline services. The PRTner Pass would not be valid on ACCESS paratransit service, which has a separate fare structure for its advanced reservation, shared ride service model.

The PRTner Pass program would require the participating entity to purchase passes for 100% of their eligible employees, students, and apartment or housing unit occupants (with limited exceptions) such that the cost is pooled. The program is proposed to offer passes, at least initially, at an approximately 70% discount from PRT's full fare 31-day/monthly pass rate—or \$28.00 per pass per month—through PRT's Ready2Ride™ ticketing application. The discounted price was established based on the expected average use per pass, including passes that are not used by participants. In other cities with similar programs, about 30% of those eligible use their passes, a statistic that helped inform the pricing model. The program allows cost sharing between the

employer/multifamily property manager/school and rider, up to the monthly price of the pass. Long term, the program is designed to price the PRTner Pass based on actual use and the full fare 3-hour fare rate. PRT plans to update the price of the PRTner Pass in the future as utilization data becomes available. PRT would also review and update pricing in the event of any changes to the full fare 3-hour fare rate.

III. Title VI Overview

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

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

It is PRT’s objective to avoid, minimize, or mitigate disproportionately high and adverse impacts on minority and low-income populations. As a recipient of financial assistance from the Federal Transit Administration (FTA), PRT is required to comply with Title VI of the Civil Rights Act of 1964 and its own adopted Title VI Program by evaluating major service and fare changes at the planning and programming stages to determine whether those changes have discriminatory impacts, including Disparate Impacts on minority populations and/or Disproportionate Burdens on low-income populations.

According to the Federal Department of Transportation, equity in the provision of transit service is described as “providing equal levels of service to minority and non-minority residents of the urbanized area. Levels of service, in turn, are defined in terms of capital allocation and accessibility.”¹ The metrics of discrimination that could be monitored for disparate treatment include fare structures that could consistently cause minority-group riders to bear a higher fare burden than the overall riding public, access to specialized fare media, or methods of communication to populations with Limited English Proficiency. However, a Title VI Equity Analysis should not replace good program planning, which should be an on-going process that considers equity among other factors when designing fare changes, service changes, or discretionary policies and programs.

IV. Port Authority of Allegheny County’s Service and Fare Equity Policy

The Federal Transit Administration (FTA) requires that transit agencies assess whether a proposed fare change or major service change would have a “Disparate Impact” on minority populations, or “Disproportionate Burden” on low-income populations, under Title VI of the Civil Rights Act of 1964, Title 49 C.F.R. Section 21.5(b)(2) and (b)(7), and Appendix C to Title 49 C.F.R. part 21. Pursuant to FTA Circular 4702.1B, FTA requires fixed route public transit agencies to clearly establish, with input through a public engagement process, threshold definitions for measuring Disparate Impacts and Disproportionate Burdens.

To comply with FTA Circular 4702.1B, on November 20, 2015, PRT’s Board adopted the Disparate Impact and Disproportionate Burden Analysis Policy for Major Service Changes or Fare Changes. The latest amendment was implemented December 8, 2017 and incorporated into the agency’s Title VI Program. PRT’s Disparate Impact and Disproportionate Burden Policy (Policy) is included as Appendix A.

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

This Policy is to be used by PRT and its consultants for analysis of proposed fare changes and major service changes. It establishes threshold standards for evaluating the equity impacts and the distribution of benefits and burdens caused by any fare change or major service change.

The Policy establishes a statistical threshold to determine whether minority and low-income riders would be disproportionately impacted by the adverse effects of a change between an existing fare and a proposed fare. The threshold is defined as the impact of any change that results in a minority population bearing adverse effects that are 20 percent more than the adverse effects borne by the non-minority population. For low-income populations, the Disproportionate Burden threshold is defined as the impact of any change that results in a low-income population bearing adverse effects that are 20 percent more than the adverse effects borne by the non-low-income population. The thresholds also apply if the gain (benefit) among non-minority or non-low-income populations is 20 percent more than the benefits for minority or low-income populations. When these conditions are met, a Disparate Impact or Disproportionate Burden exists. This threshold is based on the cumulative impact of the proposed service or fare change.

PRT defines a Fare Change as any increase or decrease of fares, whether applicable to the entire transit system, or on certain transit modes, or by fare payment type or fare media. The definition of Fare Change does not include instances where all passengers ride free, or to temporary fare reductions that are mitigating measures for other activities such as construction, or to promotional fare reductions, so long as the temporary fare reduction or promotional reduction does not last longer than six months.

Prior to adopting a fare structure or price change, PRT must conduct a fare equity analysis and analyze specific elements of the proposed structure, along with the recommended pricing schema, to determine whether the changes would result in impacts that exceed the threshold established by the Policies. For fare changes, adverse effects could include an increase in cost or a reduction in accessibility of fare media. The analysis contained within this report uses PRT's adopted thresholds for determining Disproportionate Burden and Disparate Impacts.

Should the fare equity analysis show that the proposed fare structure change results in a Disparate Impact or Disproportionate Burden, alternatives should be considered to avoid, minimize, and mitigate the discriminatory results of the proposed fare change. However, if the mitigations do not minimize adverse effects, the equity analysis must demonstrate a substantial legitimate justification or must be demonstrated that there were no comparably effective alternatives that would result in fewer adverse impacts.

V. Fare Equity Analysis Methodology

The typical measure of Disparate Impact or Disproportionate Burden involves a comparison between the proportion of persons in the protected class (i.e., minority or low income populations) who are adversely affected by the service or fare change and the proportion of persons not in the protected class (i.e., non-minority or non-low income) who are adversely affected.²

Based on the Federal Guidance, the transit provider shall—

- (i) Determine the number and percent of users of each fare media being changed;
 - (ii) Review fares before the change and after the change;
 - (iii) Compare the differences for each particular fare media between minority users and overall users;
- and

² Federal Circular: C4702.1B Chap IV-10

-
- (iv) Compare the differences for each particular fare media between low-income users and overall users.³

The Fare Equity Analysis in this report does not follow the typical fare equity analysis template, in part because PRT's proposed PRTner Pass is a new pass program with very little information on prospective participants. PRT did undertake a bulk pass pilot program in 2023, involving the distribution of 113 passes to employees at 4 selected employers. This pilot program yielded some important information on pass utilization, but lacked a sufficient sample size for demographic information, including race/ethnicity and household income. In order to gather greater information on the demographics of potential future participants, PRT sent the Employer Pass program survey to prospective organizations to distribute to employees; however, only 18 eligible survey responses were received. The responses to the survey and demographic data captured was believed to be insufficient for use in the Average Fare Analysis, and an alternative methodological approach was considered.

Because the PRTner Pass program leaves open the option for entities to pass on the cost to the participant, it was determined that a fare equity analysis would be required. The chosen methodology for this analysis uses data from the 2022 PRT Title VI Fare Survey, Fiscal Year 2023 fare revenue, ridership and pass sales data, and detailed, transaction-level data from the fare collection system (5-months, from Feb-2023 through Jun-2023) for calculation of product-specific transfer rates.

The analysis estimates the average fare paid (or received by PRT) before and after the implementation of the PRTner Pass program for potential users. For purposes of this analysis, NWC Partners has assumed that the difference in the adverse effects absorbed by minority and low-income persons as a result of the pass program shall not be greater than 20% when compared to non-minority and non-low-income groups.

Average Fare Analysis Methodology

For the Average Fare Analysis, the effects of the PRTner Pass program are examined for Disparate Impact by comparing average weighted fares before and after introducing the PRTner Pass for minority and non-minority riders. The average fare per boarding before the PRTner Pass is based on the distribution of minority and non-minority full fare riders by fare payment method on the 2022 PRT Title VI Fare Survey and distribution of Fiscal Year 2023 ridership by fare payment method. The average fare per boarding for PRTner Pass users is based on the full fare 3-hour pass rate of \$2.75 and the transfer rate for similar, existing pass programs. Any difference in the percent change of the average fare of +/-20% between the two groups would signal a Disparate Impact. Likewise, PRT tests potential fare changes for a Disproportionate Burden on low-income riders. Once again, the effects of a fare change are examined by comparing the average fare for potential PRTner Pass users before and after introducing the PRTner Pass. Any difference in the percent change of the average weighted fare of +/-20% between these two groups would likewise signal a Disproportionate Burden.

The Average Fare Analysis uses Fiscal Year 2023 fare revenue, ridership and pass sales data by fare payment method to establish the current average fare paid for each fare payment method, disaggregated by income and ethnicity. This provided the current average fare paid by each of the four groups of interest (minority, non-minority, low income, non-low income), thereby providing the basis to compare the average fare paid per boarding under the current fare structure ("before" average fare) to the average fare paid per boarding under the PRTner Pass program ("after" average fare). Because the pricing of the PRTner Pass is designed to be based on expected use on a linked-trip basis and the full fare 3-hour pass rate, current transfer rates from similar, existing pass programs were used to estimate the "after" average fare per boarding. For the employer PRTner Pass program, transfer rates from riders in the JobPerks program were used. For the student PRTner program, the average transfer rate from the existing U-Pass and Pittsburgh Public School pass programs was used. For the

³ Federal Circular C4702.1B Chap. IV-19

multifamily residential PRTner program, the average transfer rate for all full fare products available to the general public was used. The transfer rates were derived from detailed, transaction-level data from the fare collection system (5-months, from Feb-2023 through June-2023). It should be noted that the Average Fare A assumes that all eligible users of the PRTner Pass program would be able to access the benefits of the program through the Ready2Ride mobile app which may prove a barrier for eligible users without a smartphone. However, without data to support analysis of that premise, we have assumed that once PRT has implemented the program to scale, it may be necessary to determine whether using the Ready2Ride mobile app exclusively to access the PRTner pass would provide a barrier for participation for low-income or minority riders that could be mitigated by offering the passes on smartcard media, when that media becomes available. All riders, regardless of their income and ethnicity are assumed to have the same "after" fare, as there is no data to support the demographics of future PRTner Pass riders. The percentage difference between "before" and "after" average fares was compared for each of the PRTner Pass entity groups.

The Average Fare Analysis provides the percentage change between the existing and proposed fare changes by minority/non-minority and low-income/non-low-income, to assess whether the proposed fare changes will fall within the thresholds established by PRT for a Disparate Impact or Disproportionate Burden.

Data Use

The Average Fare Analysis relied on Fiscal Year 2023 fare revenue, ridership and pass sales data. Ridership data was segmented by fare payment method using farebox, electronic fare collection system, and pass sales data.

The Average Fare Analysis also uses pass usage rates and transfer rates from detailed, transaction-level data from PRT's electronic fare collection system. A sample of data from a five-month period (Feb-2023 through Jun-2023) was used in the analysis. Using current fare and pass pricing and pass usage rates, the average fare per boarding was derived.

Finally, the 2022 PRT Title VI Fare Survey was used as the primary source for demographic data by fare payment method. For purposes of the Fare Equity Analysis, ethnicity and income characteristics for the Average Fare Analysis are based upon the survey results by fare payment method and then applied to ridership data by fare payment method.

The 2022 PRT Title VI Fare Survey asked respondents whether they paid with a 3-Hour Pass with unlimited transfers/rides and Stored Card Value which are the same fare payment method. As such, the survey responses for these products were combined.

VI. Ridership Demographics Overview

The following provides an overview of PRT's systemwide ridership taken from the 2022 PRT Title VI Fare Survey, which is the most recent passenger intercept survey conducted by PRT.

These demographic statistics have been considered in the development of the PRTner Pass program in order to minimize or avoid the potential for changes to result in a Disparate Impacts on minority riders or Disproportionate Burden on low-income riders.

Ethnicity Assumptions

For purposes of the Fare Equity Analysis, minority populations are those who have not identified themselves as only "White" on the 2022 PRT Title VI Fare Survey. These categories include:

- (1) Black/African American, which refers to people having origins in any of the Black racial groups of Africa.
- (2) Hispanic/Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- (3) 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, India, China, the Philippine Islands, Japan, Korea, or Vietnam.
- (4) American Indian/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.
- (5) Native Hawaiian/Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- (6) Other, not included above.

Income Assumptions

For purposes of the Disproportionate Burden Policy, PRT defines low-income populations as those whose household income is at or below the U.S. Department of Health and Human Services (HHS) Poverty Guidelines. Because the 2022 PRT Title VI Fare Survey asked respondents for their total 2021 annual household income, NWC Partners used the 2021 Poverty Guideline to determine which populations would be considered low-income.

Table 1 provides the 2021 U.S. HHS Poverty Guidelines. Because the 2022 PRT Title VI Fare Survey asked both household income and household size, household size and income were used to categorize each individual survey respondent accurately using U.S. HHS Poverty Guidelines. Table 2 presents the income categories used in the 2022 PRT Title VI Fare Survey. Our analysis did not include those who refused to respond to both the household income and household size questions, since they could not be properly categorized.

Table 1: 2021 HHS Poverty Guidelines

Persons in Family/Household	Poverty Guideline
1	\$12,880
2	\$17,420
3	\$21,960
4	\$26,500
5	\$31,040
6	\$35,580
7	\$40,120
8	\$44,660
For families/households with more than 8 persons, add \$4,540 for each additional person.	

Table 2: 2022 PRT Title VI Fare Survey Income Categories

2022 PRT Title VI Fare Survey
Less than \$10,000
\$10,000 to \$14,999
\$15,000 to \$19,999
\$20,000 to \$24,999
\$25,000 - \$34,999
\$35,000 - \$49,999
\$50,000 - \$74,999
\$75,000 - \$99,999
\$100,000 - \$124,999
\$125,000 - \$149,999
\$150,000+

Ridership Demographics

To support the Fare Equity Analysis, we performed cross-tabulations of the survey data to develop a breakdown of fare payment by minority and low-income riders, versus non-minority and non-low-income riders, as shown in the figures below.

Figures 1 and 2 provide a systemwide overview on ethnicity and income. For purposes of the analysis, and in this review, minority status is characterized as anyone who responded to anything other than “White.” Low income status includes anyone whose household income is at or below the U.S. HHS Poverty Guidelines based on household size. The proportion of minority and low-income riders is notable – almost half of PRT’s riders are considered minority and over one third of PRT’s riders are considered low income.

Figure 1: Ridership Minority Status

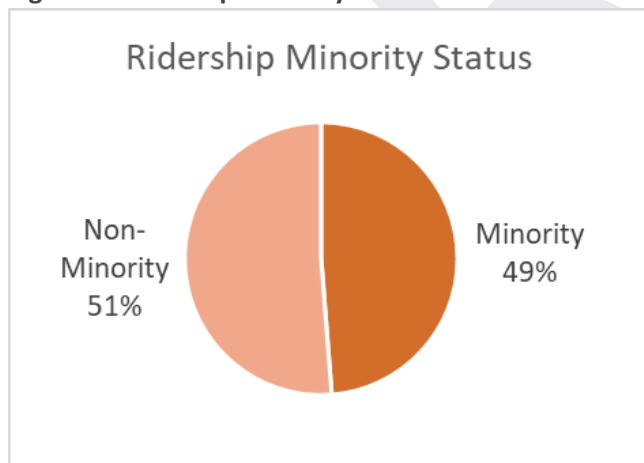
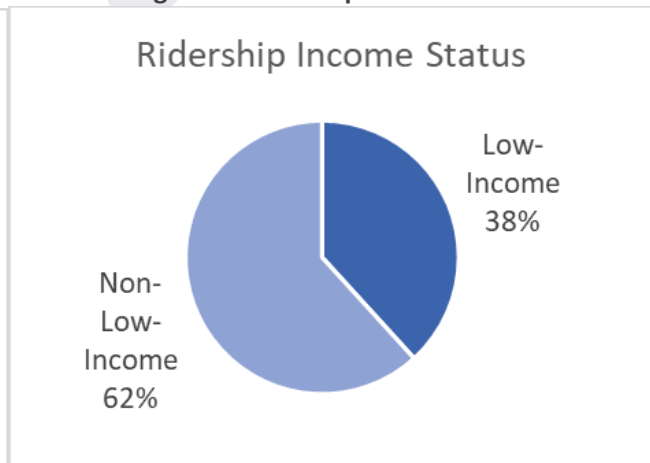


Figure 2: Ridership Income Status



Source: 2022 PRT Title VI Fare Survey

We also reviewed the relationship between fare payment method and ethnicity and income as we recognize that fare changes to individual fare payment methods may impact some protected groups more than others. Table 3 presents the fare payment method by minority and income status, while Table 4 presents the percentage of minority and low-income ridership by fare payment method.

Table 3: Fare Payment Method by Minority and Income Status

Fare Payment Method	Overall	Minority	Non-Minority	Low-Income	Non-Low-Income
Cash	12%	15%	9%	14%	9%
Cash, Half Fare	0.2%	0.2%	0.3%	0.5%	0.1%
3-Hour Pass	18%	16%	20%	19%	18%
3-Hour Pass, Half Fare	1%	2%	1%	2%	1%
Day Pass	10%	10%	10%	8%	10%
7-Day / Weekly Pass	19%	21%	18%	15%	22%
7-Day / Weekly Pass, Half Fare	0.9%	1.0%	0.6%	1.0%	0.8%
31-Day / Monthly Pass	13%	11%	14%	9%	17%
31-Day / Monthly Pass, Half Fare	1%	1%	1%	2%	1%
Annual Pass	0.9%	1.0%	0.7%	1.0%	0.8%
U-Pass	9%	7%	11%	14%	8%
Pittsburgh Public Schools Pass	3.0%	4.0%	1.0%	5.0%	0.9%
Senior Citizen Pass	8%	8%	8%	7%	7%
Free Rail Fare Zone	2.0%	1.0%	2.0%	0.6%	3.0%
Other	1.0%	1.0%	2.0%	0.6%	1.0%
Total	100%	100%	100%	100%	100%

Source: 2022 PRT Title VI Fare Survey

Note: columns may not sum to 100% due to rounding

Table 4: Minority and Income Status by Fare Payment Method

Fare Payment Method	Minority	Non-Minority	Total	Low-Income	Non- Low-Income	Total
Cash	61%	39%	100%	49%	51%	100%
Cash, Half Fare	42%	58%	100%	73%	27%	100%
3-Hour Pass	43%	57%	100%	39%	61%	100%
3-Hour Pass, Half Fare	63%	37%	100%	56%	44%	100%
Day Pass	49%	51%	100%	34%	66%	100%
7-Day / Weekly Pass	52%	48%	100%	30%	70%	100%
7-Day / Weekly Pass, Half Fare	69%	31%	100%	53%	48%	100%
31-Day / Monthly Pass	42%	58%	100%	24%	76%	100%
31-Day / Monthly Pass, Half Fare	49%	51%	100%	47%	53%	100%
Annual Pass	63%	37%	100%	54%	46%	100%
U-Pass	39%	61%	100%	53%	47%	100%
Pittsburgh Public Schools Pass	73%	27%	100%	78%	22%	100%
Senior Citizen Pass	50%	50%	100%	38%	62%	100%
Free Rail Fare Zone	27%	73%	100%	13%	87%	100%
Other	44%	56%	100%	26%	74%	100%
Overall	49%	51%	100%	38%	62%	100%

Source: 2022 PRT Title VI Fare Survey

VII. Fare Study Proposal Summary

In 2023, PRT conducted a six-month pilot between April 17th and October 16th, 2023 and May 1st and November 1st, 2023 depending on the participating pilot employer's approved pilot timeline. The intent of the pilot was to help PRT understand how to run a potential permanent bulk/universal pass, including interest in the program, pricing, eligibility, administrative process, and cost of operation vs. revenue. The pilot was funded by a \$49,725 grant from the Heinz Endowments that was awarded in February 2020. The grant funding was sought to minimize the risk of PRT losing revenue through the pilot. Due to the pandemic and changing staffing, the development of the pilot did not start until fall 2022 with the program launching on March 1, 2023 with a 30-day application period.

There were three goals to the pilot:

- Increase transit ridership;
- Reduce congestion and the need for parking; and
- Help Allegheny County residents and businesses reduce their carbon footprint by making healthier, more sustainable transportation choices about how they get around.

The pilot program targeted both employers and residential developments. While there was strong interest from employers, only a handful of developers sent inquiries and only one applied for the program before the application closed (others showed interest after the application closed). Several employers also removed themselves prior to the start date because they were unwilling or unable to pay for passes for all employees regardless of their current use of transit. *Note:* This was a heavily advertised requirement of the program and is consistent with how other transit agencies who have such programs in place have implemented them.

As part of the pilot, PRT identified potential employers with employees that commuted by transit that could serve as the demonstration for the pilot. Applicants were scored based on responses to application questions: 1) who will receive and benefit from passes; 2) demonstrated efforts to support active transportation; 3) proposals for after the pilot; and 4) how the cost will be accounted for. Through an application process, PRT selected four (4) employers across Allegheny County for use by their employees. A total of 113 passes were distributed. The passes were valid on all bus, light rail and incline services, but not valid on PRT Access paratransit service, which has a separate fare structure for its advanced reservation, shared ride service model.

As a condition of the pilot, participating employees completed pre- and post-pilot surveys, and their travel patterns were analyzed using PRT's Ready2Ride application to assess the pilot's impact along with the potential for a permanent program. Initial attitudinal results showed that the passes were highly valued by the employee, increased transit use, and may influence their job choice were the program to continue. The participating employers were eager to participate in the program beyond the pilot.

Due to the success of the pilot, PRT assigned its contracted fare consultant, NWC Partners, to review the pilot findings and provide insight into similar programs at other transit agencies in order to assist in the development of a proposed permanent universal pass program at PRT. While the pilot was focused on employers, discussions with PRT staff also identified additional partner organizations that could benefit from a universal pass program, including multifamily properties and secondary and postsecondary schools that are not part of PRT's existing University Pass (U-Pass) Program.

To mirror the success of the pilot and expand the program's reach, the PRTner Pass program was designed to encourage ridership by allowing employers, multifamily residential property owners and managers, and schools to purchase passes for their employees, residents/tenants, and students at a deeply discounted rate. The PRTner Pass will be valid for unlimited use on all PRT bus, light rail and incline services. The PRTner Pass will not be valid

on PRT Access paratransit service, which has a separate fare structure for its advanced reservation, shared ride service model. Participants residing outside of Allegheny County would still be considered eligible for the employee and school programs. However, all entities that participate must be physically located within PRT's service area. If approved by PRT's Board, PRT will then begin outreach with potential multifamily property owners and managers, schools, and employers, with a tentative PRTner Pass program start date in the second half of FY 2025.

The three defined groups within Allegheny County who can participate in the PRTner Pass program are described below along with their program parameters:

Employers

1. Must have at least ten (10) eligible employees.
2. Employer must have a physical operating location(s) or recurring assigned physical work location(s) for its eligible employees in Allegheny County.
3. Contract cost is determined by the total number of eligible employees.
4. Eligible employees are all "benefits-eligible" employees, or other defined groups subject to written justification of the employer and PRT review and approval.
 - a. Employees excluded from the program include employees aged 65 and older who are eligible for free Senior Transits Passes through PRT. Other exclusions may be considered at PRT's sole discretion.
5. Employers may opt to purchase passes for employees who work 100% remotely, employees who work less than full-time and do not qualify for employer-provided benefits (working 24 or more hours a week on a 40 hour week schedule), or independent contractors.

Multifamily residential property owners and managers

1. Must have at least ten (10) eligible units in one physical location within the PRT service area.
2. Contract cost is determined by the total number of units.
3. One pass must be purchased for each unit regardless of occupancy, with the option to purchase additional passes. A unit's pass cannot be used by a resident of another unit.
4. There are no exclusions based on age for the residential program; it is solely based on number of units.

Schools

1. Available for secondary and post-secondary schools that are not eligible to participate in PRT's existing University (U-Pass) Program.
2. Contract cost is based on the total number of eligible students.
3. Schools must purchase a pass for all students age 12 and up.
 - a. Only students ages 12 and up are considered eligible for the program.
4. Pass program would be considered active during the traditional 10-month school year, with an option to extend year-round for the additional cost to do so.
5. Eligible students include those who may live outside of Allegheny County but commute and go to school at a physical school location in Allegheny County.

Contracts and Pass Distribution

In order to participate, employers, multifamily residential managers/owners, and secondary and post-secondary schools would be required to purchase a pass for 100% of eligible participants (units) regardless of who uses transit. Participating entities would enter into rolling 12-month contracts with PRT that include financial obligations, contract terms, and PRTner Pass program compliance, and administration requirements for PRT's

management and the participating entity's ongoing participation in the program. Entities will be responsible for providing to PRT the number of eligible participants (units) and managing the email list of active eligible participants through the PRT Masabi Partner Portal as a condition of the contract including updating the participant list when new participants are added or when participants depart the program. An application process will be put in place by PRT to vet and confirm eligible PRTner Pass Program entity participants before proceeding to enter into a contract for PRTner Pass Program participation.

In order to access the transit passes, users would need to register for the PRT mobile app (Ready2Ride) using their smartphone and email. Once registered and added to the participant list, users would be able to ride with the issued monthly pass when using the Ready2Ride mobile app on PRT bus, light rail and incline services. At launch, PRTner Passes would be exclusively on the Ready2Ride mobile app and smart cards, or other physical fare media would not be available. As PRT implements the program to scale and smart cards become available as part of PRT's fare collection system, PRT intends to evaluate the impacts of having the program exclusively on the Ready2Ride mobile app to determine if that results in impacts to minority and/or low-income eligible users and consider offering PRTner Passes on smart card media.

PRTner Passes are non-transferable, and passes cannot be resold or used by anyone other than the issued passholders.

PRT may require additional documentation and establish additional requirements for PRTner Pass program participation eligibility as required, such as required documentation during the application and eligibility application determination process and/or to conduct compliance reviews and audits

Contract Pricing

The passes are proposed to be offered at \$28.00 per month, which is an approximately 70% discount over the full-fare 31-day pass (currently priced at \$97.50). In order for PRT to offer the passes at the discounted price, only entities that purchase passes for 100% of eligible employees, students and multifamily apartment or housing units will be able to participate in the PRTner Pass program. Employers who do not want to purchase a pass for 100% of eligible participants can purchase undiscounted passes through PRT's existing Job Perks program, which also enables employers to offer public transit fare to their employees at a pre-tax rate through payroll deduction.

It is expected that not all participants will take advantage of their passes, or they may use them infrequently, which enables PRT to offer the PRTner Pass at such a deeply discounted price. The introductory price is based on the estimated use of the pass and PRT's current full fare rate of \$2.75 for a 3-hour pass. The price is comparable in price to universal programs offered by other transit agencies.

Contract costs will be dependent upon the total number of eligible participants, as defined earlier. Entities may pass through the cost per participant, but the cost cannot exceed the cost per participant paid.

PRT plans to update the price of the PRTner Pass in the future as utilization data becomes available, approximately 18 months after launch of the PRTner Pass program. PRT will also review pricing in the event of any changes to the full fare 3-hour fare rate. Program pricing may be further adjusted by PRT, including potential tiered pricing for smaller or larger participant pools, based upon PRT's assessment of the program's effectiveness and subject to authorization for further price adjustments being provided by PRT's Board.

Exclusions

In order to provide program consistency for employers, schools and multifamily residential units, some exclusions will apply.

- Participating employers may opt to but are not required to buy a pass for an employee who works 100% remotely or who does not qualify for employer-provided benefits (working less than 24 hours a week on a 40 hour week schedule); or independent contractors. However, employers must have at least ten (10) eligible employees to participate.
- On-call and temporary employees, along with unpaid volunteers, are ineligible to participate in the program.
- Other employer exclusions may be considered and approved by PRT, in its sole discretion, with adequate written justification presented by the employer.
- Seniors over the age of 65 who qualify for free PRT Senior Passes are not eligible to participate in the Employer PRTner Pass program as they are able to ride free on PRT service. However, there is no age restriction for the multifamily residential program, as the program is based on units.
- Students under the age of 12 are not eligible for participation in the school program, which is for secondary or post-secondary schools not eligible to participate in PRT’s University Pass (U-Pass) Program.

VIII. Fare Proposal Outreach

Public Outreach Overview

As required by PRT Board-adopted and federal policies for adjusting fares, public engagement opportunities must be provided in advance of a final recommendation to the Board in accordance with PRT’s Public Hearing Process for Fare Increases and Major Service Reductions (as most recently amended by PRT’s Board on December 8, 2017). PRT must provide adequate opportunities for users, residents, and other stakeholders to provide feedback on the proposed adjustment. PRT’s staff received authorization from the Board to initiate public comment at PRT’s Board meeting on July 26, 2024. The public comment process was open from August 12, 2024, to October 11, 2024. Comments received are analyzed, and staff will present final recommendations to PRT’s Board in October.

PRT held Question and Answer information sessions and a public hearing to inform PRT’s riders of the proposed PRTner Pass program and solicit feedback on the proposal. The Question-and-Answer sessions and the public hearing were conducted online through Microsoft Teams with a phone dial-in option to assist those without reliable internet connections. The public was also invited to attend the public hearing in-person in the Pittsburgh Regional Transit Board Room. At the public hearing, public comments and testimonies were collected. Oral testimonies were limited to three minutes per speaker. The public hearing was recorded and transcribed by a court reporter and made part of PRT’s official records. The Questions and Answer session was conducted on Tuesday, September 10 from 11:00 A.M. to 12:00 noon and 5:30 PM to 6:30 PM. The public hearing was held on Thursday, Sept. 12 from 1:00 PM to 3:00 PM.

In addition to the online public information sessions and public hearings, public comments were also accepted by mail at PRT’s Administrative Office (Heinz 57 Center, 345 Sixth Avenue, Third Floor, Pittsburgh, PA 15222), by phone with a message on a recorded line, or through PRT’s dedicated page at: www.rideprt.org/PRTnerPass between August 12 through October 11, 2024.

During the public outreach process, PRT received a total of 30 comments from the various outreach mediums, as identified in Table 5. A breakdown of the number of comments by positive/negative is provided in Table 6.

Table 5: Comment Tally

Comment Medium	Commenters
Online	22
Public Hearing	8

Letters	0
Voicemail	0
Total	30

Table 6: Comment Tally by Proposal and Positive/Negative/Neutral

Comment Medium	Introduction of PRTner Pass		
	Positive	Negative	Neutral
Online	15	3	4
Fare Hearing	8	0	0
Letters	0	0	0
Voicemail	0	0	0
Total	23	3	4

Incorporation of Feedback into Final Recommendation

PRT does not propose any modifications to the proposed PRTner Pass program but has included some clarifications about the program communicated to the public during the public comment period. PRT plans to outreach to employers, schools and multifamily property owners and managers as part of the roll-out of the PRTner Pass program. Over time, any significant changes proposed to the PRTner Pass program will be brought to the Board for consideration consistent with relevant PRT policies and legal or regulatory requirements.

IX. Fare Equity Analysis Findings

The Average Fare Analysis uncovered no Title VI equity concerns using PRT’s Board-adopted Disparate Impact and Disproportionate Burden Policy that is incorporated into PRT’s Title VI Program. In all cases, minority and low-income riders participating in the PRTner Pass programs (employer, school, multifamily residential) had either a slightly greater reduction or a slightly lesser increase in their average fare, compared to non-minority and non-low-income riders. All of the changes resulted in less than significant differences between the two groups and were all within the 20% policy threshold. As such, no mitigations are recommended or required to proceed with the implementation of the PRTner Pass program based on the Average Fare Analysis.

Analysis Results

When comparing the change in average fare per boarding with the introduction of the PRTner Pass program, the analysis suggests that in all cases, protected populations (minority, low-income riders) would experience either a slightly greater reduction or a slightly lesser increase in their average fare, compared to non-protected populations (non-minority, non-low-income riders).

Table 7 provides the analysis for the employer PRTner Pass program. The table shows that while all rider populations are anticipated to see a small increase in their average fare, the increase for minority riders (+2.2%) is less than the increase for non-minority riders (+3.5%). Similarly, the increase in the average fare for low-income riders (+1.5%) is less than the increase for non-low-income riders (+3.7%).

Table 7: Average Fare and Change - Employer PRTner Pass Program

Employer Pass	Average Fare per Boarding		Unit Change		% Difference between Protected and Non-Protected Population
	Before	After	\$	%	
Minority Pass Participant	\$2.20	\$2.25	\$0.05	2.2%	1.3%
Non-Minority Pass Participant	\$2.18		\$0.08	3.5%	
Low-Income Pass Participant	\$2.22		\$0.03	1.5%	
Non-Low-Income Pass Participant	\$2.17		\$0.08	3.7%	

Table 8 provides the analysis for the multifamily residential PRTner Pass program. The table shows that all rider populations are anticipated to see a small reduction in their average fare, and that the reduction in average fare for minority riders (-9.6%) is greater than the reduction for non-minority riders (-8.5%). Similarly, the reduction in the average fare for low-income riders (-10.3%) is greater than the reduction for non-low-income riders (-8.4%).

Table 8: Average Fare and Change - Multifamily Residential PRTner Pass Program

Residential Pass	Average Fare per Boarding		Unit Change		% Difference between Protected and Non-Protected Population
	Before	After	\$	%	
Minority Pass Participant	\$2.20	\$1.99	-\$0.21	-9.6%	1.1%
Non-Minority Pass Participant	\$2.18		-\$0.19	-8.5%	
Low-Income Pass Participant	\$2.22		-\$0.23	-10.3%	
Non-Low-Income Pass Participant	\$2.17		-\$0.18	-8.4%	

Table 9 provides the analysis for the school PRTner Pass program. The table shows that all rider populations are anticipated to see a small reduction in their average fare, and that the reduction in average fare for minority riders (-7.6%) is greater than the reduction for non-minority riders (-6.5%). Similarly, the reduction in the average fare for low-income riders (-8.3%) is greater than the reduction for non-low-income riders (-6.3%).

Table 9: Average Fare and Change - School PRTner Pass Program

Student Pass	Average Fare per Boarding		Unit Change		% Difference between Protected and Non-Protected Population
	Before	After	\$	%	

Minority Pass Participant	\$2.20	\$2.04	-\$0.17	-7.6%	1.1%
Non-Minority Pass Participant	\$2.18		-\$0.14	-6.5%	
Low-Income Pass Participant	\$2.22		-\$0.18	-8.3%	2.0%
Non-Low-Income Pass Participant	\$2.17		-\$0.14	-6.3%	

For all three PRTner Pass programs, the reductions in average fare are greater for protected populations than for non-protected populations, or the increases in average fare are less for protected populations than for non-protected populations. Using PRT’s Disparate Impact and Disproportionate Burden thresholds, the introduction of the PRTner Pass would not represent a Disparate Impact on minority riders and would not represent a Disproportionate Burden on low-income riders.

X. Cumulative Findings

A Fare Equity Analysis should not take the place of thoughtful planning at the earliest stages of project development. Considering the impacts that plans, programs or projects have on minority and low-income communities has been a critical part of the early planning and development process for the introduction of the PRTner Pass program.

The Average Fare Analysis did not find that introducing the PRTner Pass program would result in a Disparate Impact on minority riders or a Disproportionate Burden on low-income riders. Given that there were no findings of Disparate Impact or Disproportionate Burden, no mitigations are needed or required to proceed with implementation of the PRTner Pass program, subject to PRT’s Board approving this Title VI analysis and otherwise authorizing PRT to proceed with implementing the PRTner Pass Program.

Appendix A: Port Authority of Allegheny County's Disparate Impact and Disproportionate Burden Policy

The following is Port Authority's Disparate Impact and Disproportionate Burden Analysis Policy for Major Service Changes or Fare Changes last amended December 8, 2017, and included in Port Authority's 2022 Title VI Program.

PURPOSE

The Federal Transit Administration (FTA) requires that transit agencies assess whether a proposed "fare change" or "major service change" would have a "Disparate Impact" on "minority populations," or "Disproportionate Burden" on "low-income populations," under Title VI of the Civil Rights Act of 1964, Title 49 C.F.R. Section 21.5(b)(2) and (b)(7), and Appendix C to Title 49 C.F.R. part 21. Pursuant to FTA Circular 4702.1B, FTA requires fixed route public transit agencies to clearly establish, with input through a public engagement process, threshold definitions for measuring Disparate Impacts and Disproportionate Burdens.

This policy will be utilized by Port Authority of Allegheny County (Authority) for analysis of proposed fare changes and major service changes. It establishes threshold standards for evaluating the equity impacts and the distribution of benefits and burdens caused by any fare change or major service change. The Authority reserves the right to amend this policy to the extent required by future changes in the law and/or at the discretion of its Board.

DEFINITIONS

Adverse Effects

A transit provider is required to define and analyze adverse effects related to major changes in transit service. Adverse Effects may include Fare Changes, reductions in service (e.g., elimination of a route, shortlining a route, rerouting an existing route, increase in headways) or even additions to service, especially if they come at the expense of reductions in service on other routes. Transit providers are required to consider the degree of Adverse Effects, and analyze those effects, when planning service changes. The Authority will define and analyze Adverse Effects related to proposed Fare Changes or Major Service Changes. The Authority will measure the loss (the adverse impact), or the gain (benefit), among Minority Populations and nonminority populations and among Low-Income Populations and non-low-income populations when conducting a service equity analysis of a proposed Major Service Change, and among minority and overall users and among low-income and overall users when conducting a fare equity analysis for any Fare Changes.

Disparate Impact

FTA Circular 4702.1B defines Disparate Impact as 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 effects on the basis of race, color, or national origin.

Disparate Impact Threshold

The Disparate Impact Threshold is defined as the impact of any Major Service Change or Fare Change that results in a Minority Population bearing Adverse Effects which are 20 percent more than the Adverse Effects borne by the non-minority population.

Disproportionate Burden

FTA Circular 4702.1B defines Disproportionate Burden as a facially 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.

Disproportionate Burden Threshold

The Disparate Impact Threshold is defined as the impact of any Major Service Change or Fare Change that results in a Low-Income Population bearing Adverse Effects which are 20 percent more than the Adverse Effects borne by the non-low-income population.

Fare Change

A Fare Change is defined as any increase or decrease of fares, whether applicable to the entire transit system, or on certain transit modes, or by fare payment type or fare media. The definition of Fare Change does not include instances where all passengers ride free, or to temporary fare reductions that are mitigating measures for other activities such as construction, or to promotional fare reductions, so long as the temporary fare reduction or promotional reduction does not last longer than six months. A Fare Change also does not include the introduction of new fare products or fare media where those new fare products or fare media are only being added to the Authority's existing fare products or fare media versus replacing existing fare products or fare media.

Low-Income Person/Population

FTA Circular 4702.1B defines low-income person as a person whose median household income is at or below the US Department of Health and Human Services poverty guidelines, and defines low-income population as any readily identifiable group of low-income persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons who will be similarly affected by a proposed FTA program, policy, or activity.

Major Service Change

A Major Service Change is defined by the Authority as:

- addition or removal of a route;
- addition or removal of a service day for a route;
- Service changes that constitute an addition or reduction of more than 30% of the weekly trips, service hours, or service miles on a given route; or
- adding or removing more than 2,500 annual hours of service on a given route.

Any service reduction necessitated by an emergency situation or construction activity expected to last less than one year in duration is excluded from the definition of a Major Service Change.

Minority Persons

FTA Circular 4702.1B defines minority persons to include the following five groups: 1) American Indian and Alaskan Native, 2) Asian, 3) Black or African American, 4) Hispanic or Latino, and 5) Native Hawaiian and Other Pacific Islander.

Minority Population

FTA Circular 4702.1B defines a Minority Population as any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations who will be similarly affected by a proposed DOT program, policy, or activity.

DISPARATE IMPACT POLICY

The purpose of this policy is to establish protocols for determining whether a Major Service Change or Fare Change is borne disproportionately by Minority Populations. The Authority seeks to eliminate or minimize Disparate Impact upon a Minority Population as a result of a Major Service Change or Fare Change.

When a Major Service Change or Fare Change is proposed, the Authority will first define and analyze the Adverse Effects that may result from the proposed change. Upon identification of Adverse Effects, the Authority will prepare and submit a service equity analysis and/or fare equity analysis in accordance with the guidance set forth in FTA Circular 4702.1B as may be amended, for the purpose of determining whether the Major Service Change or Fare Change will have a Disparate Impact on the Minority Population. The analysis requires, utilizing the Disparate Impact Threshold, a comparison of Adverse Effects resulting from a Major Service or Fare Change as between the Minority Population and the non-minority population.

Depending upon the nature of the Major Service Change or Fare Change, the Authority may elect to establish comparison populations based upon either ridership data or the population data of a service area. Justification for selection of a ridership data comparison or a service area population comparison must be documented. When utilizing population data of a service area, the choice of a dataset shall be the smallest geographic area that reasonably has access to a transit stop or station. The Authority will document the techniques and technologies utilized to collect the ridership or population data utilized for the service equity analysis.

The equity or fare equity analysis will compare the existing service or fare to proposed changes and calculate the absolute change as well as the percent change. Utilizing the Disparate Impact Threshold, a determination will be made as to whether the Major Service Change or Fare Change will result in Adverse Effects that are disproportionately borne by the Minority Population.

If the analysis concludes that Disparate Impact will occur as a result of a Major Service Change or Fare Change, the change may be implemented only if (1) there exists a substantial legitimate justification for the proposed service change; and (2) there exists no alternatives that would have a less Disparate Impact on the Minority Population that would still accomplish the Authority's legitimate program goals.

Should any proposed Major Service Change or Fare Change result in Disparate Impact, the Authority will consider modification of the proposed change to avoid, minimize or mitigate the Disparate Impact of such change. Once a modification has occurred to avoid, minimize or mitigate potential Disparate Impacts, the Authority will conduct an additional analysis to determine whether the modifications successfully corrected the potential Disparate Impact resulting from the changes. The Authority shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including available less discriminatory alternatives, and Senior Management and Board of the Authority shall be briefed as to the outcome of the service equity analysis and/or fare equity analysis.

DISPROPORTIONATE BURDEN POLICY

The purpose of this policy is to determine whether or not Low-Income Populations will bear a Disproportionate Burden of a Major Service Change or Fare Change. While Low-Income Populations are not a protected class under Title VI, the analysis established under this policy is recognized as valuable for planning purposes.

When a Major Service Change or Fare Change is proposed, the Authority will first define and analyze the Adverse Effects that may result from the proposed change. Upon identification of Adverse Effects, the Authority will prepare and submit a service equity analysis and/or fare equity analysis in accordance with the guidance set forth in FTA Circular 4702.1B as may be amended, for the purpose of determining whether such planned changes will have a Disproportionate Burden on a Low-Income Population. The analysis, utilizing the Disproportionate Burden Threshold, requires a comparison of Adverse Effects resulting from a Major Service Change or Fare Change as between the Low-Income Population and the non-low-income population.

The equity or fare service analysis will compare the existing service or fare to proposed changes and calculate the absolute change as well as the percent change. Utilizing the Disproportionate Burden Threshold, a determination will be made as to whether the Major Service Change or Fare Change will result in Adverse Effects that are disproportionately borne by the Low-Income Population.

If the analysis concludes that Disproportionate Burden will occur as a result of a Major Service Change or Fare Change, the Authority will consider modification of the proposed change to avoid, minimize or mitigate Disproportionate Burden where practical, and the Authority should describe alternatives available to Low-Income Populations affected by the Major Service Change or Fare Change. The Authority shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including available less discriminatory alternatives, and Senior Management and Board of the Authority shall be briefed as to the outcome of the service equity analysis and/or fare equity analysis.

Adopted via Board Resolution: 11/20/2015

Amended via Board Resolution: 12/8/2017