

**Metropolitan Transportation Commission**  
**Regional Network Management Committee**

**June 14, 2024**

**Agenda Item 3b**

**Title VI Fare Equity Analysis – Clipper BayPass Phase 1 Pilot Program**

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**Subject:**

Fare equity analysis, prepared under the requirements of the Federal Transit Administration’s Title VI Circular, of the Clipper BayPass program’s first pilot phase.

**Background:**

In August 2022, MTC and San Francisco Bay Area transit agency partners launched the first phase of the Clipper BayPass Pilot Program. This pilot program offers an unlimited transit pass to selected participants at four institutions of higher education and 12 affordable housing communities in the Bay Area. In mid-2023, the Federal Transit Administration (FTA) advised MTC and the partner transit agencies that an equity analysis, consistent with the FTA’s Title VI Circular, should be prepared for this first phase of the Pilot.

To provide support in developing the analysis, MTC procured the services of a consultant, WSP, to conduct the equity analysis in partnership with MTC staff. WSP was selected from MTC’s Risk Management and Compliance bench due to its technical knowledge of Title VI.

Following the procurement, MTC worked with BART staff and WSP to develop an appropriate methodology for analyzing the equity impacts of the Clipper BayPass Phase 1 Pilot Program. A methodology was selected which analyzed the demographics of transit access expansion by geography.

WSP analyzed the demographics of the Clipper BayPass Pilot participants and the demographics of the communities surrounding the transit stops serving the participating institutions to determine whether transit access was being expanded in an equitable manner. For purposes of this analysis, a disparate impact would be identified if the BayPass population of an institution was sufficiently less ethnically diverse than the community surrounding the transit stop(s) serving the institution (as measured by the percentage of the population identifying as an ethnic minority), and a disproportionate burden would be identified if the BayPass population of an institution was sufficiently wealthier than the community surrounding the transit stop(s) serving the institution (as measured by the percentage of the population classified as low income). The

equity thresholds from each transit agency subject to Title VI requirements were used for this analysis to determine the existence of a disparate impact or disproportionate burden.

The analysis found neither disparate impact nor disproportionate burden for any population of concern at any institution with any transit agency, and therefore recommends no mitigation measures be implemented. In the event that the Clipper BayPass program expands, the study recommends prioritizing low income and minority populations when considering institutions for program expansion in the future. Staff concur with these findings and recommendations.

**Issues:**

None identified

**Recommendations:**

Information

**Attachments:**

- Attachment A: Title VI Equity Analysis Report for Clipper BayPass Phase 1 Pilot Program

  
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