



Nassau Inter-County Express (NICE)

2023 Title VI Fare Equity Analysis - DRAFT

Revised June 21, 2023

Introduction

Nassau Inter-County Express (NICE), operated by Transdev North America, is conducting a Fare Equity Analysis, as required under Title VI of the Civil Rights Act of 1964, to evaluate the effects of a proposed fare increase at the end of Summer 2023. In compliance with the Federal Transit Administration's (FTA) Circular 4702.1B, NICE conducts a detailed study to determine whether the proposed fare increase would have discriminatory effects on minority and/or low-income populations.

NICE Bus Profile

NICE provides fixed-route bus service throughout Nassau County, NY, serving the County's 1.4 million residents over 285 square miles. The service area extends into Suffolk County to the East and into Queens to the West. The area is comprised of both suburban and urban areas. NICE provides approximately eighteen million rides annually. As of Spring 2023, the system serves approximately 65,000 passengers on an average weekday.

Title VI Guidelines

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

"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."

FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," was published in 2012 in order to comply with the law and fulfill the requirement for all transit agencies receiving Federal funds to develop and implement an agency-wide Title VI program. Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," is a directive from the Federal government to prevent minority communities and low-income populations from being subject to disproportionately high and adverse environmental effects. The FTA circular on Title VI compliance states that while low-income populations are not a protected class under Title VI there is an "...inherent overlap of environmental justice principles in this area, and because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes."

Since NICE receives federal funding from the FTA via Nassau County, NICE Bus must comply with the circular. In accordance with Chapter 4 of FTA Circular 4702.1B, fixed-route transit providers that operate 50 or more fixed route vehicles in peak service and are in an urbanized area of a population of 200,000 or more are required to analyze the impacts of any fare changes to their system. Since the NICE Bus operation exceeds these thresholds, a fare equity analysis is required for the proposed fare increase.

NICE's Equity Thresholds

In accordance with guidelines stated in FTA Circular 4702.1B, NICE has established the thresholds below in order to determine if a proposed fare or service change would disproportionately affect minority and/or low-income populations. NICE's policy thresholds are clearly stated in the agency's 2022-2025 Title VI Program Update, which was submitted to and reviewed by the Federal Transit Administration (FTA).

MINORITY POPULATIONS

NICE's **Disparate Impact Threshold** to determine if the adverse impacts of a major service change (as defined by the NICE Major Service Change Policy) or a fare adjustment is established at **20%**, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

LOW-INCOME POPULATIONS

NICE's **Disproportionate Burden Threshold** to determine if the adverse impacts of a major service change (as defined by the NICE Major Service Change Policy) or a fare adjustment is established at **20%**, based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

Current Fare Structure

NICE's current fare and payment structure is listed below:

FARE TYPE	COST	NOTES
Adult	\$2.75	-
Senior	\$1.35	Age 65+ / Medicare Card holder with Medicare Card, government-issued ID, or Nassau County Leisure Pass
Disabled	\$1.35	With Reduced-Fare MetroCard, government-issued disability ID, Nassau County Leisure Pass, or NICE Able-Ride ID
Student	\$2.25	Elementary – High School, with a NICE student pass; to/from school only
Child	FREE	44" or less, with fare-paying adult (limit 3 children per adult)
Transfer from MTA/NICE	FREE	With MetroCard within 2 hours from 1 connecting Subway/MTA bus route or 2 connecting NICE routes
Transfer from SCT/HART/Long Beach	\$0.25	-
Single Ride Ticket/ e-Ticket	\$3.00	-
7-Day Unlimited Ride	\$33.00	Available through MTA sales channels
30-Day Unlimited Ride	\$127.00	Available through MTA sales channels
20-Pack e-Ticket	\$55.00	With GoMobile/Transit apps; receive 1 free ticket
Paratransit	\$3.75	For approved Able-Ride clients

Base Fare Payment methods include:

- Cash (coins only, no paper bills)
- MetroCard (Pay-Per-Ride or Unlimited)
- GoMobile/Transit apps

NICE Bus does not yet accept payment via the OMNY system.

Peer Agency Fare Comparison

The following charts show comparative systems (in both size and location) that offer non-zoned single ride cash fares. Currently, NICE Bus offers cash and MetroCard fares for \$2.75. The charts compare fares in areas demographically similar within the New York metropolitan area, and larger systems around the country that serve populations that are comparable to the New York area.

METRO NEW YORK

Region	Agency	Base Fare
Nassau County	NICE	\$2.75
New York City	MTA NYCT	\$2.75*
Suffolk County	SCT	\$2.25
Westchester County	Bee-Line	\$2.75
New Jersey	NJ Transit	\$1.60 (Zone 1 Bus)

**MTA New York City Transit is currently planning to increase its base fare to \$2.90 at the end of Summer 2023*

UNITED STATES

City	Agency	Base Fare
Chicago	CTA	\$2.25 (bus)
Los Angeles	LA Metro	\$1.75
Dallas	DART	\$2.50
Atlanta	MARTA	\$2.50
Portland	Tri-Met	\$2.50*

**Tri-Met is currently planning to increase its base fare to \$2.80 on Jan. 1, 2024*

Proposed Fare Changes

BACKGROUND

Many NICE Bus passengers travel to and from New York City and utilize the MetroCard, issued by the New York Metropolitan Transportation Authority (MTA). NICE Bus is committed to accepting the MetroCard on its system, and thus attempts to align our policies with the MTA on many issues that affect our shared customers, especially regarding fare policy.

In Spring 2023, MTA New York City Transit is proposing to increase its base subway and bus fare by \$0.15 to \$2.90. Customers who pay a reduced fare would not see an increase in their fares. MTA has also proposed increasing the Single Ride Ticket by \$0.25 to \$3.25; the 7-Day Unlimited Ride MetroCard by \$1.00 to \$34.00; and the 30-Day Unlimited Ride MetroCard by \$5.00 to \$132.00.

NICE Bus is proposing to match MTA's planned fare increases for the base fare and Single Ride Tickets and e-Tickets, while also leaving its Senior and Disabled Fares unchanged at \$1.35. NICE does not sell 7-Day or 30-Day Unlimited Ride MetroCards, but will continue to accept those MTA-issued media. Finally, NICE is proposing to increase its paratransit fare by \$0.25 to \$4.00 for approved Able-Ride customers.

NICE'S proposed fare increases are needed to address a funding gap that is driven by rising labor costs for wages and benefits, and increase costs for fuel and supplies.

FARE CHANGES

At the end of Summer 2023, NICE proposes to increase fares as shown below. The base fare increases primarily affect customers who pay the full adult fare. Reduced fares paid by senior citizens, elementary through high school students, and customers with disabilities would not change.

FARE TYPE	CURRENT	PROPOSED	CHANGE
Adult	\$2.75	\$2.90	+ \$0.15
Senior	\$1.35	\$1.45	+ \$0.10
Disabled	\$1.35	\$1.45	+ \$0.10
Student	\$2.25	\$2.25	-
Child	FREE	FREE	-
Transfer from MTA/NICE	FREE	FREE	-
Transfer from SCT/ HART/Long Beach	\$0.25	\$0.25	-
Single Ride Ticket/e-Ticket	\$3.00	\$3.25	+ \$0.25
7-Day Unlimited Ride	\$33.00	\$34.00	+ \$1.00
30-Day Unlimited Ride	\$127.00	\$132.00	+ \$5.00
20-Pack e-Ticket	\$55.00	\$58.00	+ \$3.00
Paratransit	\$3.75	\$4.00	+ \$0.25

ANALYSIS METHODOLOGY

To complete a Title VI Fare Equity Analysis of the effects of the 2023 proposed fare increase, NICE undertook the following steps:

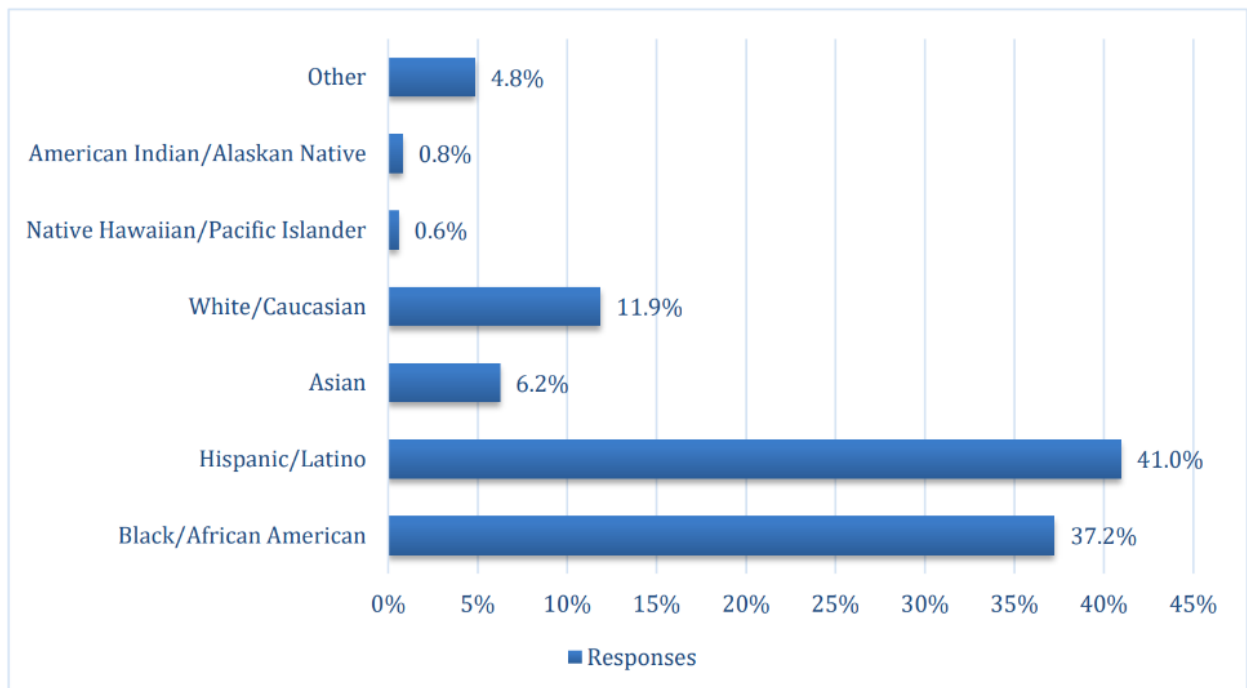
1. Determine overall ridership and ridership by fare category for Title VI-protected and low-income populations
2. Establish fare equity analysis impact thresholds
3. Evaluate whether planned fare changes will have a disparate impact on populations protected by Title VI and whether low-income populations will bear a disproportionate burden of the changes
4. Pending the results of Step 3, recommend methods to avoid, minimize or mitigate impacts as needed, or propose alternatives to fare increase

To understand overall demographics in Nassau County and among NICE Bus customers, recent U.S. Census data was used to provide context for this report. To understand specific characteristics of NICE Bus riders, data from NICE's 2021-2022 Onboard Systemwide Survey was used. In the Onboard Systemwide Passenger Survey, NICE collected 7,982 responses from customers on fare type used, race and ethnicity, income level, household size and other questions.

As per FTA guidelines, a Title VI Fare Equity Analysis identifies disparate impacts to minority populations, and disproportionate burdens on low-income populations. Onboard Survey data was used to determine whether NICE's 2023 Proposed Fare Increase would have a disparate impact and/or disproportionate burden.

NICE Rider Demographics

MINORITY POPULATIONS

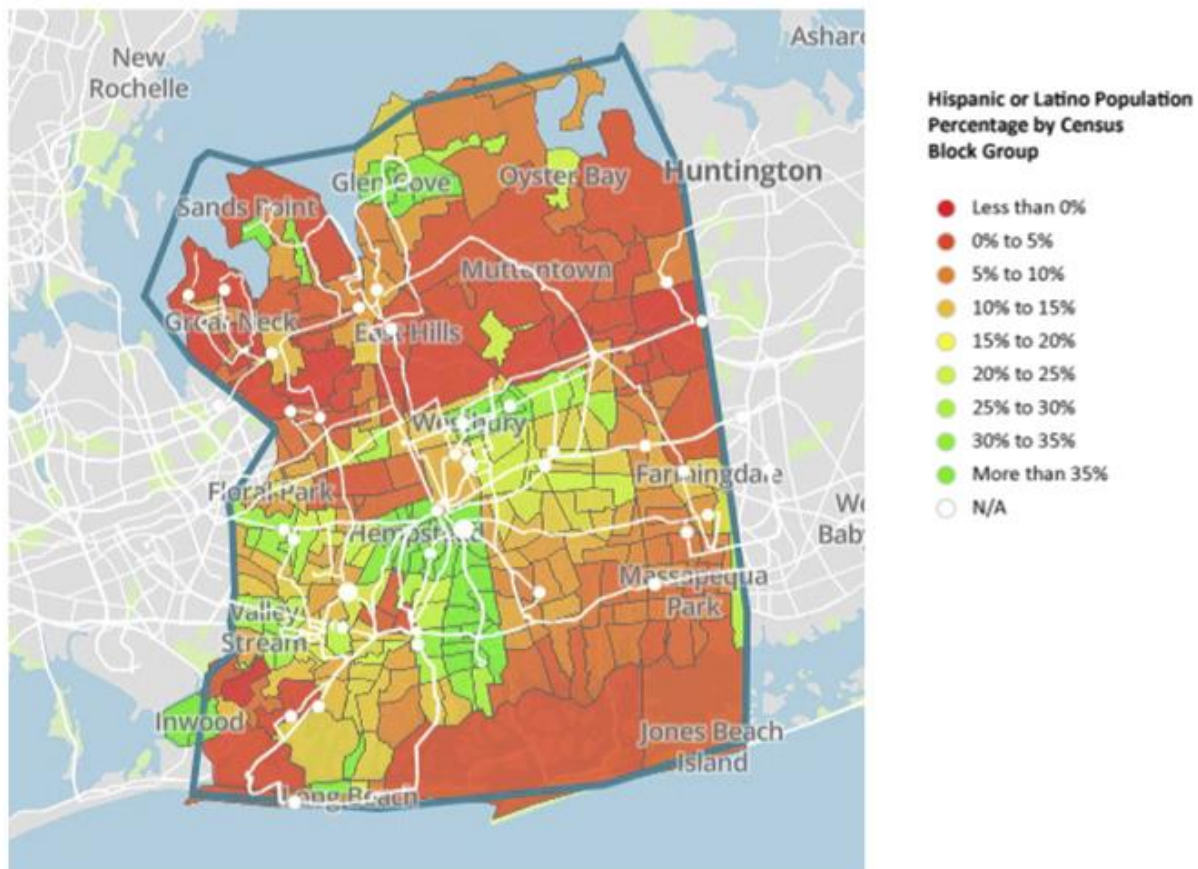


SOURCE: NICE 2021-2022 Onboard Systemwide Survey (7,982 Responses)

NICE's most recent systemwide survey shows Hispanic/Latino was the most frequently selected response cited by 41.0 of those surveyed. Black/African American persons made up 37.2% of those sampled. Respondents identifying themselves as White represented 11.9%, while 6.2% identified themselves as Asian. In total, 88.1% of NICE riders identify as a Race/Ethnicity other than White/Caucasian.

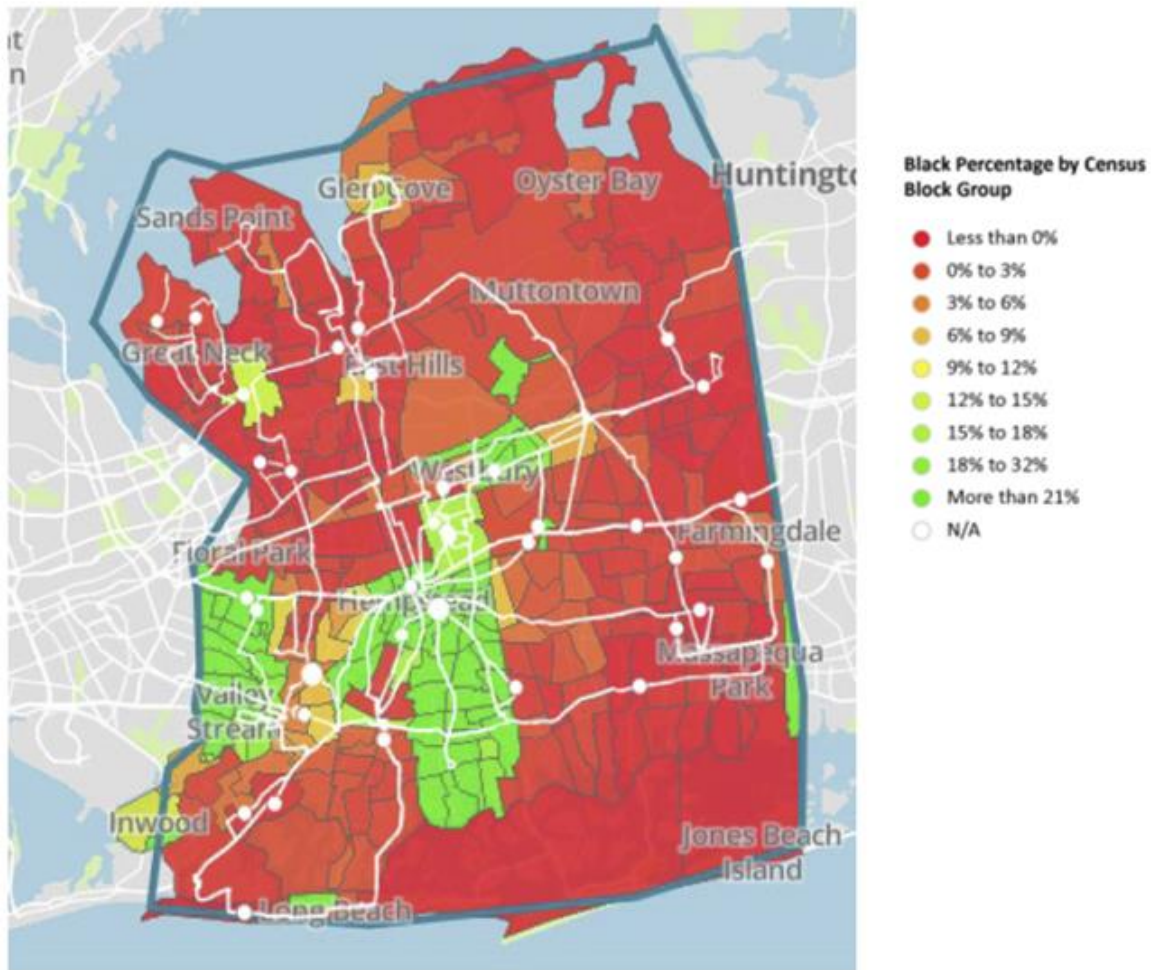
The demographics of NICE Bus riders contrast to the overall population of Nassau County, according to U.S. Census figures, who identify as 55.9% White, 17.5% Hispanic/Latino, 13.1% Black/African American, and 11.2% Asian.

The maps below show minority populations with NICE Bus route overlays for Nassau County. Each map represents a minority population's distribution across the county, and the system routes are overlaid for comparison/assessment of their access to existing service. A similar analysis was done for the low-income population in the county. Legends with concentrations are located on the right.



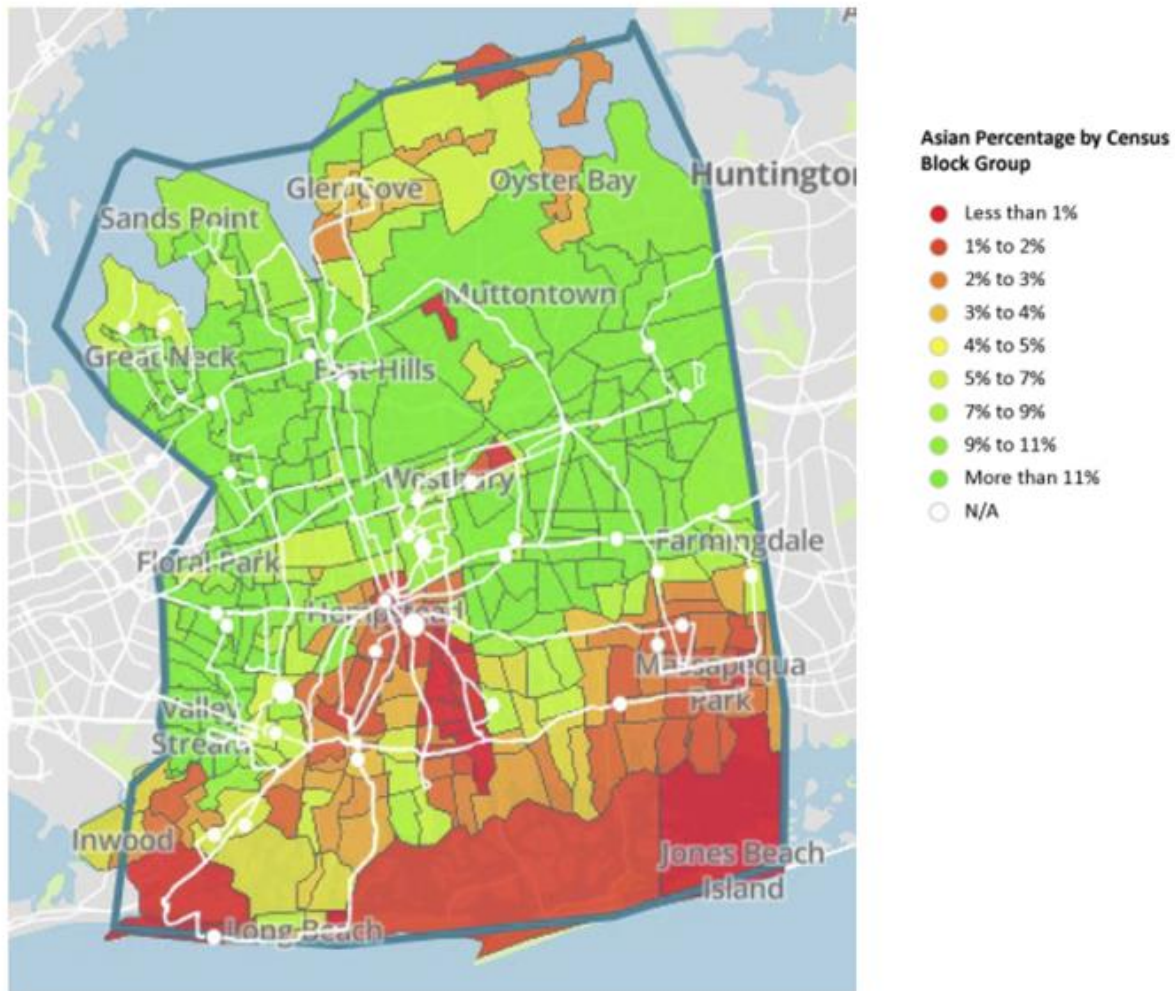
2020 American Community Survey Decennial Survey
 Nassau County, New York: Population: Hispanic
<https://data.progress-index.com/census/total-population/hispanic-population/nassau-county-new-york/050-36059/#cmap>

Hispanic/Latino populations are primarily clustered around transit lines. There is one modest concentration in the far northeast portion of the county (Oyster Bay), with transit service from the Long Island Railroad (LIRR). Other key concentrations are in or near Westbury, Hempstead, Plandome Manor, Thomaston, Freeport, Hewlett Bay Park, Inwood, and Long Beach. Nearly all routes serve one or more census blocks that include 20 percent or more of individuals who identify themselves as Hispanic/Latino.



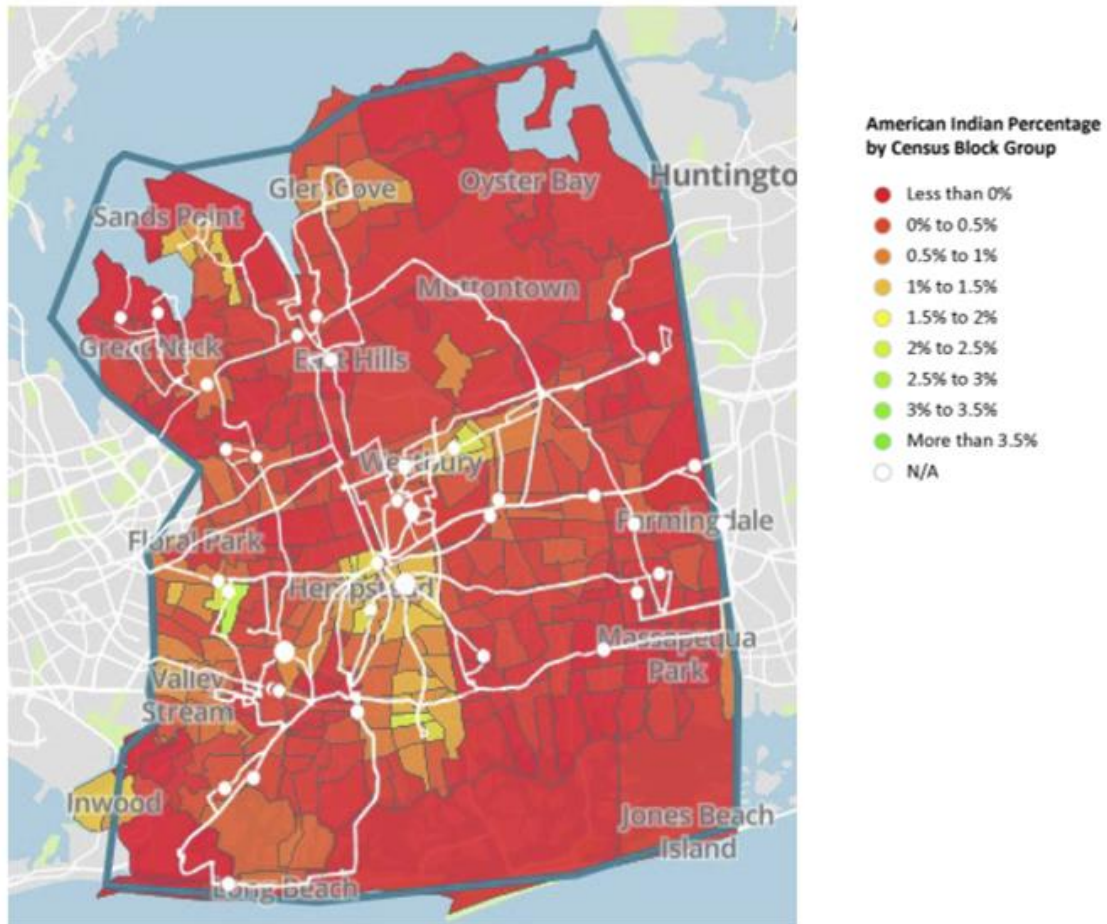
2020 American Community Survey Decennial Survey
 Nassau County, New York: Population: Black/African American
<https://data.progress-index.com/census/total-population/black-population/nassau-county-new-york/050-36059/#cmap>

Black/African American populations are primarily concentrated through central Nassau County (Hempstead, Freeport, Lynbrook, Garden City, and Westbury) and far west Nassau County (Elmont). Most of the routes in the southern portion of the county travel through one or more census block with a substantial Black/African-American population.



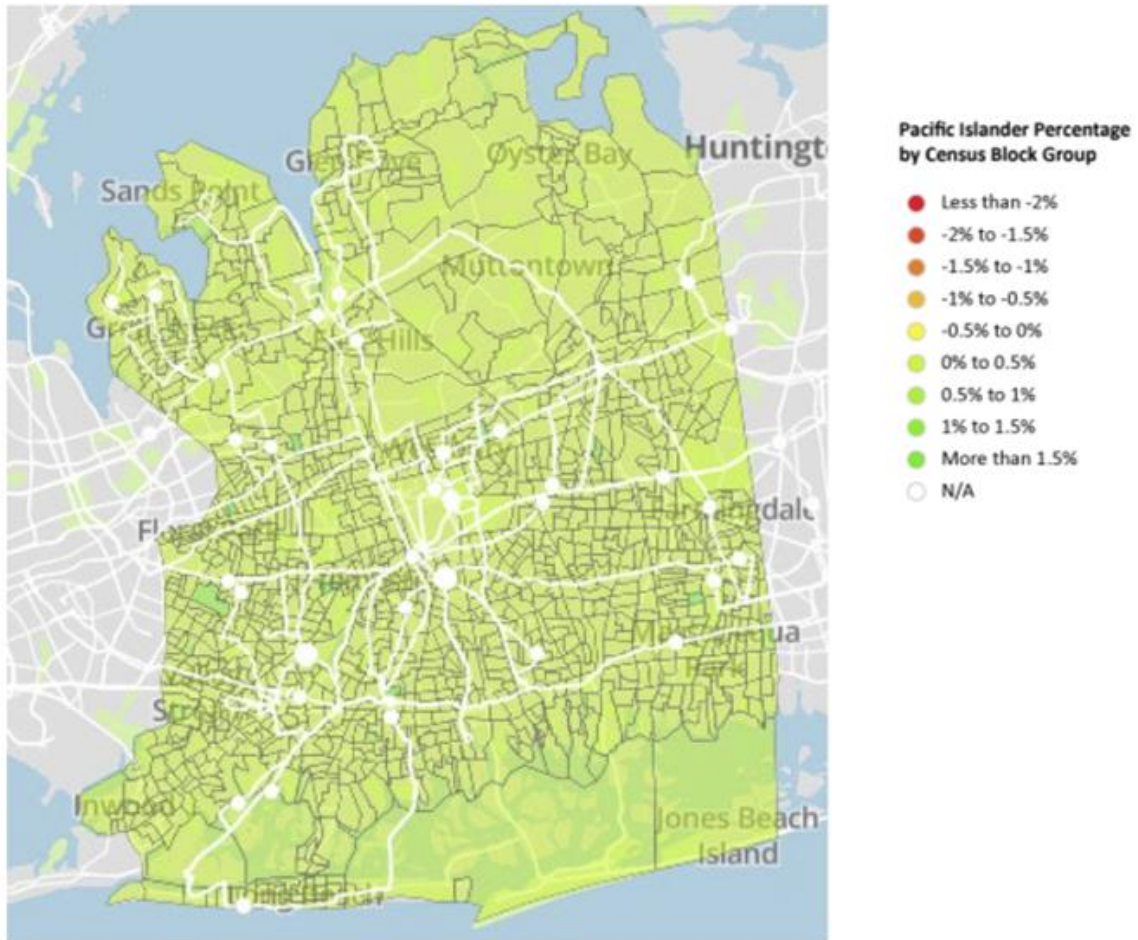
2020 American Community Survey Decennial Survey
 Nassau County, New York: Population: Asian
<https://data.progress-index.com/census/total-population/asian-population/nassau-county-new-york/050-36059/#cmap>

Asian populations are primarily concentrated in the northern half of the county; however, the sub-population are evenly dispersed with a few areas of higher densities. These denser areas are comprised of census blocks in Hicksville, New Hyde Park, West Hempstead, Franklin Square, and Valley Stream. Two areas in eastern Nassau County have an absence of NICE service – Muttontown and Syosset (Syosset, however, is served by LIRR). Most of the routes in the northern portion of the county travel through one or more census block with a substantial Asian population.



2020 American Community Survey Decennial Survey
 Nassau County, New York: Population: American Indian/Alaskan Native
<https://data.progress-index.com/census/total-population/indian-population/nassau-county-new-york/050-36059/#cmap>

Native/American Indian are relatively sparse throughout the County.

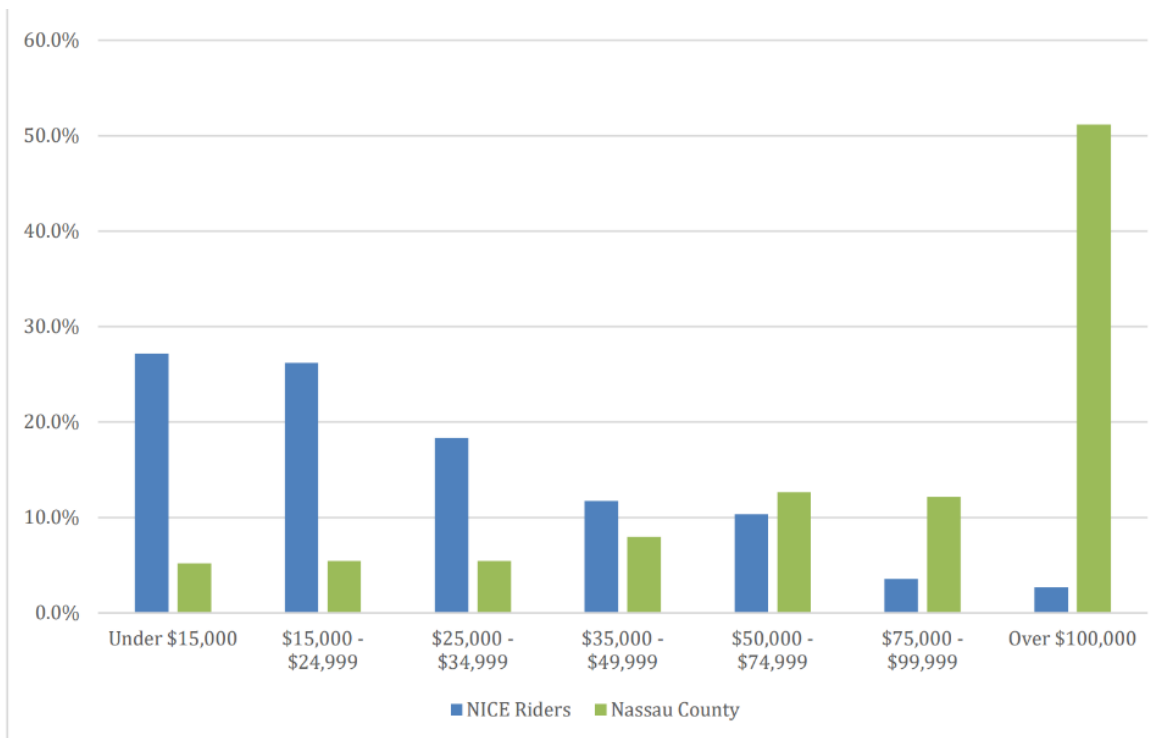


2019 American Community Survey 5-Year Estimates
 Nassau County, New York: Population: Native Hawaiian/Pacific Islander
<https://data.progress-index.com/american-community-survey/nassau-county-new-york/population/islander/num/05000US36059/>

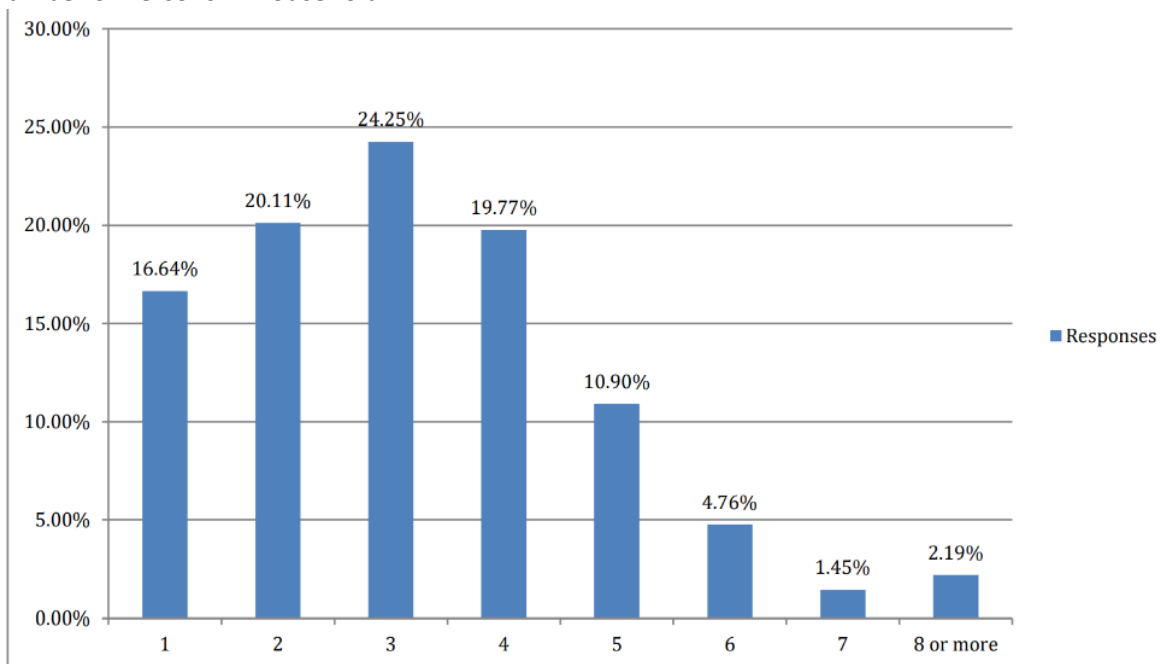
There are no significant concentrations of persons identifying themselves as being Native Hawaiian/Pacific Islander in Nassau County. Small low-density pockets exist near New Hyde Park and Massapequa.

LOW-INCOME POPULATIONS

Household Income

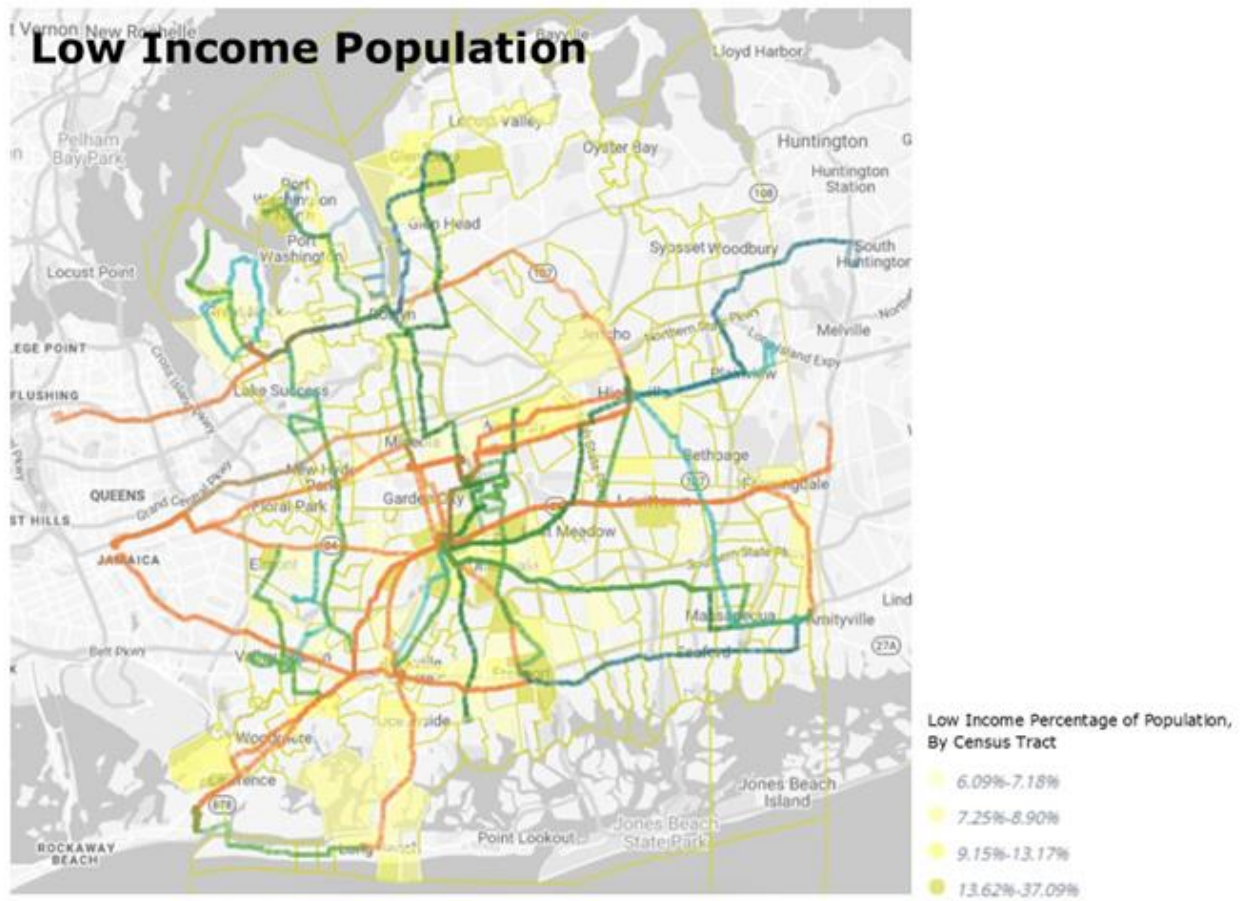


Number of Persons in Household



To understand the size of the low-income population among NICE riders, survey responses to household income and household size were compared. The chart below shows the percentage of riders who answered yes to both questions. Based on 2022 Federal poverty guidelines of \$13,590 for a household of 1 though \$46,630 for a household of 8, the darker cells indicate a strong likelihood of living in poverty, while the lightly shaded cells indicate individuals at risk of living in poverty. In total, 57.4% of NICE riders live below the federal poverty guideline.

Income vs Household	1	2	3	4	5	6	7	8+
Less than \$15,000	6.03%	4.85%	5.16%	4.86%	3.13%	1.53%	0.51%	1.07%
\$15,000 to \$24,999	4.07%	5.84%	6.90%	5.09%	2.54%	0.86%	0.39%	0.50%
\$25,000 to \$34,999	2.28%	3.74%	5.11%	4.09%	1.94%	0.78%	0.21%	0.15%
\$35,000 to \$49,999	1.91%	2.37%	3.17%	2.06%	1.21%	0.61%	0.11%	0.27%
\$50,000 to \$74,999	1.58%	1.90%	2.55%	2.14%	1.39%	0.53%	0.21%	0.05%
\$75,000 to \$99,999	0.35%	0.82%	0.78%	0.85%	0.42%	0.24%	0.06%	0.06%
\$100,000 or more	0.35%	0.55%	0.46%	0.65%	0.29%	0.26%	0.02%	0.15%



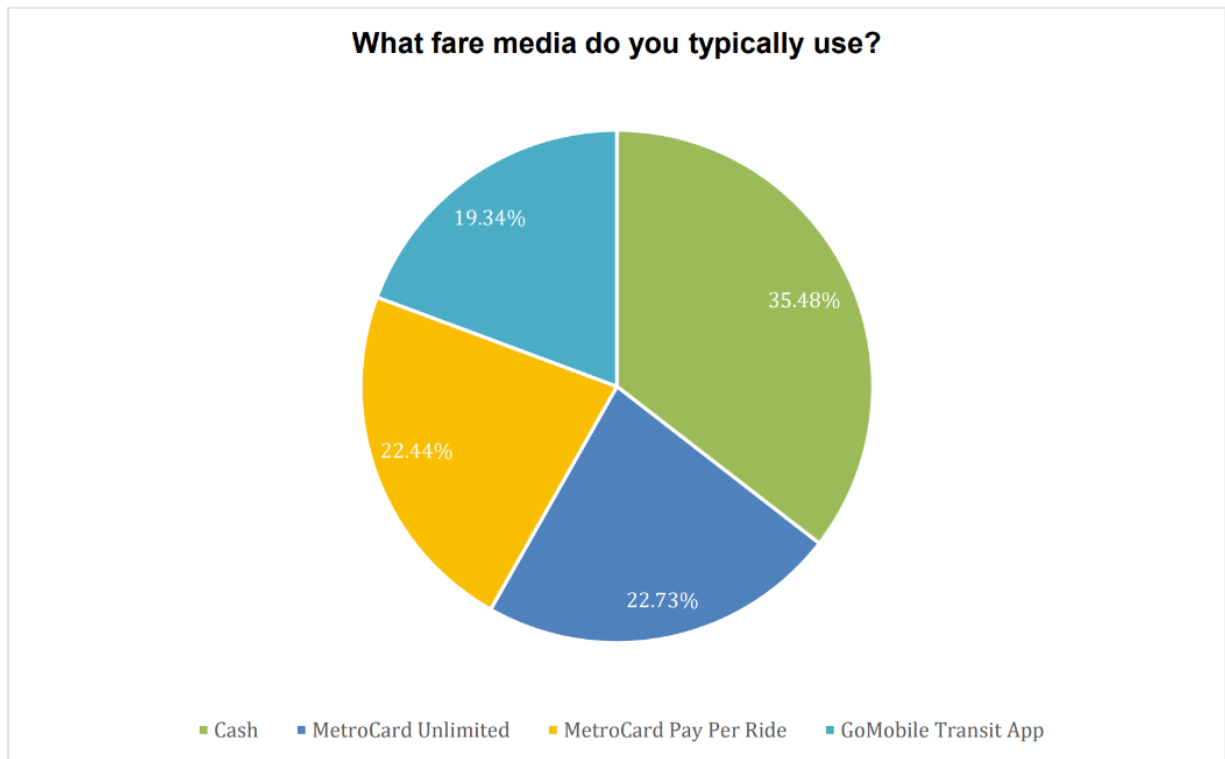
Source: **U.S. Census 2019 ACS 5-Year Estimates**

Low-income residents are primarily clustered around central Nassau. Areas with a denser concentration include Thomaston, Westbury, Hempstead, and Freeport. Nearly all routes serve one or more census blocks that include a 6.09% or greater concentration of individuals considered to be low-income.

Impact of Proposed Fare Changes

SYSTEMWIDE

The following chart shows the media by which fares (all types) are paid, on a systemwide basis:



SOURCE: NICE 2021-2022 Onboard Systemwide Survey (7,982 Responses)

Nearly 36% of surveyed riders use cash instead of a MetroCard. Access to MetroCards is limited inside Nassau County and is a contributing factor to a higher percentage of riders using cash. Currently Hempstead Transit Center is the only location within the County that has machines that allow customers to reload their MetroCards. Over 22% use the Pay-Per-Ride MetroCard option, while almost 23% choose the Unlimited 7-Day or 30-Day options. Customers who purchase a 7-Day or 30-Day Unlimited pass can see significant savings, depending on how many trips they make in the covered period.

BY ROUTE

Route FLEX had the highest percentage of respondents using a Pay-Per-Ride MetroCard (50.0%), while 48.5% of respondents on Route n21 preferred the Unlimited MetroCard. Route n79 noted the highest use of cash (66.7%), while Route n43 exhibited the highest use of the GoMobile app (45.8%). Route n80 had the lowest level of cash use (10 percent)

IMPACT TO MINORITY / LOW-INCOME POPULATIONS

The charts below show the impact of the proposed Fare changes by specific fare type on both Minority and Low-Income populations among NICE Bus riders, and comparisons to fare type usage of the overall rider population. Response percentages in the 2021-2022 Onboard Passenger Survey were projected onto NICE's average weekday ridership figures to ascertain absolute ridership numbers. Data was also used from MTA's Automated Fare Collection (AFC) fare collection system, and NICE's GoMobile electronic ticketing platform.

Fare Type Usage by Group

Fare Type	COST		CHANGE		MINORITY		LOW-INCOME		OVERALL	
	Current	Proposed	Absolute	Percent	Absolute	Percent	Absolute	Percent	Absolute	Percent
Adult Base	\$2.75	\$2.90	\$0.15	5.5%	32,418	55.9%	22,087	58.5%	37,141	56.4%
Senior/ Disabled	\$1.35	\$1.45	\$0.10	7.4%	2,529	4.4%	2,073	5.5%	2,831	4.3%
Student	\$2.25	\$2.25	\$0.00	0.0%	1,486	2.6%	1,218	3.2%	1,663	2.5%
Single Ride Ticket/e-Ticket	\$3.00	\$3.25	\$0.25	8.3%	3,841	6.6%	1,768	4.7%	4,546	6.9%
7-Day Unlimited Ride	\$33.00	\$34.00	\$1.00	3.0%	4,043	7.0%	2,527	6.7%	4,402	6.7%
30-Day Unlimited Ride	\$127.00	\$132.00	\$5.00	3.9%	9,669	16.7%	6,043	16.0%	10,529	16.0%
20-Pack e-Ticket	\$55.00	\$58.00	\$3.00	5.5%	1,655	2.9%	762	2.0%	1,959	3.0%

Fare Type Impact Comparison

Fare Type	Minority vs. Overall	Low-Income vs. Overall
Adult Base	-0.5%	2.1%
Senior/Disabled	0.1%	1.2%
Student	0.1%	0.7%
Single Ride Ticket/e-Ticket	-0.3%	-2.2%
7-Day Unlimited Ride	0.3%	0.0%
30-Day Unlimited Ride	0.7%	0.0%
20-Pack e-Ticket	-0.1%	-1.0%

Based on the data above, none of the fare types contain cost increases which have greater than a 20% difference on minority populations (NICE's established disparate impact threshold), or low-income populations (NICE's established disproportionate burden threshold).

While the previous charts show whether Minority and Low-Income populations would be disproportionately impacted compared to NICE riders as a whole, NICE also looked at the cumulative impacts each group would face when compared to non-Minority and non-Low Income riders.

To analyze this, percentages of fares paid by group and fare type were annualized over the course of the year. Costs for Unlimited Ride MetroCards were broken out into per-ride costs, based on the estimated average number of NICE Bus rides taken per card.

Cumulative Annualized Impact Comparisons

Annual Fares Paid	Minority Riders	Non-Minority Riders	Low-Income Riders	Non Low-Income Riders
Current	\$24,327,326	\$3,390,110	\$16,155,625	\$12,041,615
Additional Fare	\$1,288,256	\$197,431	\$827,322	\$652,667
Change	+5.30%	+5.82%	+5.12%	+5.42%

Based on the data above, the cumulative impacts of the proposed fare changes are not greater than 20% on minority populations (NICE's established disparate impact threshold), or low-income populations (NICE's established disproportionate burden threshold).

In fact, the Minority population among NICE riders would see a slightly lower average per-ride fare increase (5.30%), than the non-Minority population (5.82%). Similarly, the Low-Income population would see a slightly lower average per-ride fare increase (5.12%) than the non-Low Income population (5.42%).

Outreach & Engagement

As part of any proposed fare or service change NICE Bus will follow its Public Participation Plan, as outlined in its 2022-2025 Title VI Program Update. The objectives of the Public Participation Plan are to:

- Actively engage regional transit agencies on the Title VI Fare Equity Analysis
- Solicit participation and feedback from target Title VI populations
- Hold meetings early in the process
- Provide frequent notification of opportunities to be involved
- Provide equitable access to relevant project information
- Monitor and evaluate outreach activities to determine effectiveness

Performance measures to determine the effectiveness of the Public Participation Plan include:

- Accessibility
- Reach
- Diversity/Equity
- Decision Integration

PUBLIC MEETINGS

To facilitate public involvement through the Title VI Fare Equity analysis process, NICE Bus plans to hold public meetings to solicit feedback as well as produce press releases, car card campaigns, posters at major transit centers, and notifications and announcements in area newspapers, the NICE Bus website and throughout various social media channels.

Two public meetings have been scheduled to present draft findings and obtain feedback on the Fare Equity Analysis. Meetings were provided to educate attendees on this project and obtain feedback on fare equity findings and provide input on any mitigation that may be needed. Meetings will be held:

1. Open House Session
Thursday, July 13, 2023 from 3:00 to 4:30pm
NICE Bus Mitchel Field Depot, 700 Commercial Ave, Garden City, NY
1 Floor Conference Room
2. Bus Transit Committee Meeting
Thursday, July 13, 2023 from 6:00 to 7:30pm
NICE Bus Mitchel Field Depot, 700 Commercial Ave, Garden City, NY
1 Floor Conference Room

Summaries of the public meetings including comments will be provided for review.

COMMUNICATION CHANNELS

Several notification strategies have been implemented to ensure the public remains aware of upcoming opportunities to engage in the study. A series of posters were created to convey key project information and to advertise the public forums. Posters were strategically placed and/or distributed in public locations in an effort to reach the target audiences; locations included at transit centers, on buses and at other locations effective at reaching audiences with limited access to the online information. Notification materials were translated in Spanish to reach LEP populations. Copies of these handouts, flyers and notifications are found in the Public Participation Summary document.

Web-based communications and social media outreach was another component of the public outreach strategies that was a highly effective tool in providing information quickly to a wide and diverse audience, all for little cost. Updates and announcements were included in the web page, Facebook pages and Twitter pages.

Press releases were developed and circulated to media outlets across the region and provided updates on the project and important meeting notifications. The news releases are distributed to minority and Spanish language media outlets to support outreach to Title VI minority population groups and those LEP populations. A copy of the notification list for all stakeholders were provided in the Public Participation Summary document.

MINORITY, LOW-INCOME & LEP POPULATION OUTREACH

The demographic data identified a significant proportion of Spanish speakers in the region that use NICE Bus transit services, therefore, translation services were recommended. Translation of vital project materials, such as handouts and comment forms, were developed, and targeted meetings were scheduled for groups that serve Spanish-speaking LEP populations and interpretation services were provided at select public forums and community events

PUBLIC COMMENTS

Comment forms will continue to be collected at all community events and public meetings, and through a project webpage, dedicated phone line, and email. Information on name, address, email, stakeholder type, voluntary demographic data, and specific comments were entered into a comment database. Comments will be tabulated upon completion of the PPP process, categorized and analyzed.

Conclusion

This Fare Equity Analysis has shown that the proposed fare changes would not impact minority or low-income NICE Bus riders disproportionately compared to the overall rider population. NICE has taken particular care in proposing changes which preserve the ability to pay the same fare with cash as is paid with other fare media (i.e. MetroCard or GoMobile/Transit Apps). This reflects the understanding that a sizeable percentage of NICE riders pay their fare with cash.

RECOMMENDATION

If MTA New York City Transit moves ahead with its proposed fare changes at the end of Summer 2023, it is recommended that NICE adopt the (similar) fare changes discussed and analyzed in this report. A fare increase is the best solution to assist in filling the funding gap created by rising costs for labor and supplies because it preserves NICE's ability to maintain the robust service levels it offers today. NICE Bus has as its top priority the provision of service that is attractive and cost-effective to the customer, and as such made every effort to limit the proposed fare changes as much as possible.

MITIGATION

Though this Fare Equity Analysis did not find that minority or low-income populations would be disproportionately affected by the proposed fare changes, NICE understands that any increase in fares has the potential to be difficult for some customers. To help subsidize the cost of transit for those who need it most, NICE has partnered with United Way of Long Island for the "Everyone Rides NICE" program, which distributes free MetroCards through more than 20 social service agencies throughout the region. Since its inception in 2017, the program has distributed more than \$850,000 worth of free MetroCards.