



District Department of Transportation

# DC Circulator Fare Adjustment Plan

April 2018





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## 1.0 Proposed Fare Adjustment Summary

DDOT proposes eliminating the acceptance of paper passes that are valid only on DC Circulator. The paper passes account for less than two percent of total fare payments, but the process required for operators to validate the passes—including the training and enforcement time required to take the pass from the customer, write an effective date, and check the effective date on each pass presented—is labor-intensive and weak enforcement enables pass holders to potentially use passes beyond their expiration.

DC Circulator paper passes are currently only available for purchase via CommuterDirect.com or in-person at the Rosslyn Commuter Store in Arlington, Virginia. They have also been used occasionally for rider promotions.

The proposed rule does not change fare amounts for any fare media currently used to board a DC Circulator bus. It only proposes eliminating paper passes. Passengers will still have the option to pay for DC Circulator rides with all other current fare media, including the SmarTrip-based “7-Day Regional Bus Pass” sold by WMATA.

## 2.0 Proposed Fare Adjustment Timeline

**Table 1** presents the timeline for the implementation of the proposed fare changes, including the public comment period and opportunities available for public comment.

**Table 1 |** Proposed Timeline for Implementation of Proposed Fare Changes

Milestone	Date	Notes
Notice of Proposed Fare Changes Published in the D.C. Register	December 16, 2017	
Notice of Proposed Fare Changes placed on DC Circulator Buses	December 16, 2017	
Public Comment Period	December 16, 2017 – January 19, 2018	Comments will be accepted via a comment form on the webpage, via phone call, or via paper form available on all DC Circulator buses

### DC Circulator Fare Adjustment Plan



Milestone	Date	Notes
Public Hearing on Proposed Fare Changes	January 4, 2018	7:00 PM – 9:00 PM, The Miracle Theatre, 535 8th St SE, Washington, DC 20003
Implementation Plan Published on DC Circulator Website		
Notice of Final Rulemaking Amending DC Circulator’s service published in D.C. Register		
Notice of Fare Changes Posted on all DC Circulator buses and the website		
Fare Change Implemented	April 2018	

## 3.0 Fare Equity Analysis

### 3.1. Introduction

District of Columbia Municipal Regulations *Rule 18-1503: Fare Adjustments, Service Adjustments, and Public Participation* requires DDOT to prepare a Fare Adjustment Plan that includes a summary of the proposed fare changes, timeline for their implementation, an equity analysis illustrating any disparate impact of the proposed fare changes on populations protected under Title VI of the Civil Rights Act of 1964, and an explanation of the necessity of the proposed fare changes.

#### 3.1.1. Title VI Policies

##### 3.1.1.1. FTA Requirements

This analysis was conducted in accordance with FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. The Circular requires, under Title VI of the Civil Rights Act of 1964, that the District Department of Transportation (DDOT) undertake an evaluation of any proposed fare change to determine whether it has a discriminatory impact on Title VI protected minority



populations or on low-income populations. Any transit operator with at least 50 vehicles in peak service is required to conduct a fare equity analysis.

The FTA Circular states that the analysis should include:

- A statement of the agency's disparate impact and disproportionate burden policies and how the public was engaged in developing the policies.
- An analysis of fare media generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or fare media that would be subject to the fare change.
- A determination of the number and percent of users of each fare media proposed to change.
- Comparison of the differences in impacts between minority users and overall users.
- Comparison of differences in impacts between low-income users and overall users.
- An analysis of any alternative transit modes, fare payment types, or fare media available for people affected by the fare change.
- Identification of whether minority population will experience disparate impacts.
- If a disparate impact is found, DDOT has considered modifying the proposal to remove these impacts. If DDOT determines a disparate impact exists and will make the fare changes despite these impacts, DDOT has clearly demonstrate substantial legitimate justification for the proposed fare change and analysis of alternatives for disparate impacts or that they have sought to avoid, minimize, or mitigate the impacts of a finding of disproportionate burden.

### **3.1.1.2. Relevant DDOT Title VI Policies**

DDOT's 2016-2018 Title VI Program established criteria for DDOT's *disparate impact*, and *disproportionate burden* policies:

- *Disparate impact* refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin. DDOT defines a disparate impact as occurring when the percentage of minority riders bearing adverse effects due to a major service change or fare change is 15 percent or greater than the percentage of non-minority riders. DDOT reviews disparate impacts on a cumulative basis.
- *Disproportionate burden* refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. DDOT defines a disproportionate burden as occurring when the percentage of low-income riders bearing adverse effects due to a proposed major service change or fare change is 15 percent or greater than the percentage of non-low-income riders. DDOT reviews disproportionate burdens on a cumulative basis.



DDOT engaged the public in developing definitions for major service change, disparate impact, and disproportionate burden in October and November 2015. DDOT offered four opportunities for the public to comment on draft major service change, disparate impact, and disproportionate burden policies:

- **DDOT website:** A handout with the draft policies was posted on DDOT’s website, and members of the public could respond with comments or questions to an email address on the site.
- **DC Circulator Semi-Annual Open House:** A public information board with the draft policies, and dedicated staff person to explain the board and answer questions, were available at the DC Circulator Semi-Annual Open House at Thomson Elementary School on October 6<sup>th</sup>, 2015 for public questions and comments.
- **DC Circulator Annual Anacostia Neighborhood Meeting:** A public information board with the draft policies, and dedicated staff person to explain the board and answer questions, were available at the DC Circulator Anacostia Neighborhood Meeting at the Anacostia Neighborhood Library on November 4<sup>th</sup>, 2015, for public questions and comments.
- **Survey:** As a parallel to its larger on-board DC Circulator rider survey, DDOT administered a survey both on its website and at public events that included questions about draft policies. The survey was administered from October 6<sup>th</sup> and November 13<sup>th</sup>, 2015.

### 3.1.2. Methodology

#### 3.1.2.1. Fare Equity Analysis Methodology

DDOT analyzed this proposed fare change for potential disparate impacts and disproportionate burdens using the following process:

1. Analyzed fare media generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or fare media that would be subject to the fare change.
2. Determined of the number and percent of users of each fare media proposed to change.
3. Compared of the differences in impacts between minority users and overall users.
4. Compared of differences in impacts between low-income users and overall users.
5. Analyzed alternative transit modes, fare payment types, or fare media available for riders affected by the fare change.
6. Identified whether minority populations will experience a disparate impact, or low-income populations will experience a disproportionate burden.
7. If a disparate impact is found, DDOT considered modifying the proposal to remove these impacts. If DDOT determined a disparate impact exists and will make the fare changes despite these impacts, DDOT has clearly demonstrated substantial legitimate justification for the proposed fare change and analysis of alternatives for disparate impacts or that they have sought to avoid, minimize, or mitigate the impacts of a finding of disproportionate burden.



### 3.1.2.2. Data

DDOT used the most recent locally available survey data for DC Circulator to conduct this analysis. For this analysis, the demographics per fare type for DC Circulator came from DDOT's 2016 Customer Service Survey.

## 3.2. Fare Equity Analysis

### 3.2.1. Description of Existing DC Circulator Fares

For individual rides, DC Circulator riders pay one dollar, using either cash or a SmarTrip card. Senior/Disabled riders pay 50 cents, and District of Columbia public school students can use a DC One card to ride for free on weekdays during specified times. Children under five years of age ride for free with a paying adult rider. DC Circulator offers paper passes for one-day, three-day, seven-day, and monthly time periods (**Table 2**). Paper passes can only be used on DC Circulator buses. They can be purchased for unlimited rides for a period of one-day (\$3), three-day (\$7), seven-day (\$11), or a month (\$40). Paper passes can only be purchased online via [CommuterStore.com](http://CommuterStore.com), or in person at the Rosslyn Commuter Store location in Arlington, Virginia.

DC Circulator riders also have access to a SmarTrip-based WMATA 7-Day Regional Bus Pass. This unlimited pass (\$17.50) is good for seven days on DC Circulator, Metrobus, Maryland Transit Administration Local Bus, Alexandria DASH, Fairfax Connector, Fairfax CUE, Arlington ART, Loudoun County Transit, PRTC OmniRide, Prince George's County TheBus, and Montgomery County Ride On. This pass can be purchased online, at one of WMATA's five sales offices in the District of Columbia and Virginia, at one of Maryland's three Commuter Stores, one of Virginia's 11 commuter stores, or one of almost 400 retail outlets in the WMATA service area that sell SmarTrip cards.<sup>1</sup>

Transfer discounts are only available via SmartTrip card. These discounts are not affected by the proposed fare media change (**Table 3, Table 4**).

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<sup>1</sup> Metro Sales Locations. <http://www.wmata.com/fares/purchase/where.cfm>



**Table 2 | Existing DC Circulator Fares and Fare Amounts**

<b>Fare</b>	<b>Amount</b>
Regular	\$1.00
Senior/Disabled	50 cents
DC Students (with DC One Card)	Free (weekdays, 5:30am-9:00am, 2:00pm-8:00pm)
Children Under 5	Free (with paying adult rider)
<b>DC Circulator Paper Pass</b>	
• One-Day	\$3
• Three-Day	\$7
• Seven-Day	\$11
• Monthly	\$40
WMATA 7-day regional bus pass	\$17.50

**Table 3 | Transfers to DC Circulator (only available via SmarTrip card)**

<b>Transfers to Circulator</b>	<b>Amount</b>
From Circulator (within 2 hours)	Free
From Metrobus (within 2 hours)	Free
From Metrorail	50 cents
Senior/Disabled persons from Metrorail	Free
From Arlington Transit (ART)	Free

**Table 4 | Transfers from DC Circulator (only available via SmarTrip card)**

<b>Transfers from Circulator</b>	<b>Amount</b>
To Metrobus	75 cents
To Metrobus Express	\$3

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Transfers from Circulator	Amount
To Metrobus Airport shuttle	\$6
To Metrorail	50 cent credit

### 3.2.2. Fare Usage by Minority and Low-Income Riders

Three quarters of DC Circulator riders pay their fare with a SmarTrip card (which could also include WMATA’s 7-day regional bus pass); of the remaining users, about 18 percent pay in cash, about four percent pay using a DC One Card, and under two percent pay using a one-day/three-day/seven-day or Monthly pass (Table 5).

**Table 5 | Overall Fare Usage (from 2016 Customer Service Survey)**

Fare Type	Usage
SmarTrip	75.5%
Cash	17.9%
DC One Card	4.1%
Paper Pass (1 Day /3-Day /7-day /Monthly Pass)	1.8%
Other	0.7%

DDOT analyzed the fare media data generated from a 2016 DC Circulator Customer Service Survey for differences in fare media use among low-income, minority, and overall system riders. There was almost no difference in paper pass use between low-income riders and the overall system riders, or between minority riders and the overall system riders. Just under two percent over overall riders use a paper pass (Table 6).

**Table 6 | 1 Day, 3 Day, Weekly and Monthly Pass Use (from 2016 Customer Service Survey)**

	Use Percentage	Use Number	Difference from Overall Riders	Meets DDOT’s Disparate	Meets DDOT’s Disproportionate Burden Threshold?



Fare Media	Minority	Low Income	Overall	Minority	Low Income	Overall	Minority	Low Income	Impact Threshold?	
1-Day / 3-Day / 7-day / Monthly Pass	2.1%	1.6%	1.8%	18	6	22	0.3%	-0.2%	No	No

### 3.2.3. Fare Payment Alternatives

DDOT is not proposing to increase or decrease the price of any fare media; the proposed fare change is to eliminate the paper pass, which is sold in one day, three-day, seven-day, and monthly formats. However, as part of its effort to analyze alternative fare payment types, or fare media available for people affected by the fare change, DDOT reviewed potential fare payment amounts for users who would no longer have access to DC Circulator paper passes.

#### 3.2.3.1. Alternative Fare Payment Options – SmarTrip or Cash

For many DC Circulator riders, the current paper pass costs more than paying with a SmarTrip card, or with cash. Below are two examples comparing the costs for DC Circulator riders who take two trips per day.

If a DC Circulator rider took two trips per day, with no transfers, on a one day or three-day pass, they would pay more with the paper pass than if they paid with a SmarTrip card or with cash. If a DC Circulator rider took two trips per day, for five days, using a seven-day pass, they would pay more with the paper pass than if they paid with a SmarTrip card or with cash. If a DC Circulator rider used a monthly pass to ride two trips per day, five days per week, they would pay the same amount using SmarTrip or cash as the monthly paper pass (Table 7).

**Table 7 |** Fare Amounts (two trips per day, five days per week)

Two trips per day	SmarTrip or Cash	Paper Pass	Pass Compared to Alternatives
1 Day (1 day)	\$2	\$3	+\$1
3 Day (3 days)	\$6	\$7	+\$1
7 Day (5 days/week)	\$10	\$11	+\$1
Monthly (5 days/week)	\$40	\$40	Same



However, if a DC Circulator rider took two trips per day, with no transfers, with a seven-day or monthly pass, and rode at least six days per week, then they would pay slightly more using SmarTrip or cash than they would with a seven day or monthly paper pass (Table 8). Approximately 11 percent of riders responding to the DC Circulator 2016 Customer Service Survey indicated that they take DC Circulator more than 10 times per week. Of those riders who take more than 10 DC Circulator trips per week, only about 16 percent use a paper pass.<sup>2</sup>

**Table 8 |** Fare Amounts (two trips per day, six days per week)

Two trips per day	SmarTrip or Cash	Paper Pass	Pass Compared to Alternatives
1 Day (1 day)	\$2	\$3	+\$1
3 Day (3 days)	\$6	\$7	+\$1
7 Day (6 days/week)	\$12	\$11	-\$1
Monthly (6 days/week)	\$48	\$40	-\$8

### 3.2.3.2. Alternative Fare Payment Options – WMATA Bus Pass

DC Circulator passengers will still have the option to purchase the SmarTrip-based “7-Day Regional Bus Pass” sold by WMATA. While there is limited data on use of this pass by DC Circulator riders (it was not included as an option on the 2016 DC Circulator Customer Service Survey), this pass, which costs \$17.50 and is only available on SmarTrip cards, gives riders access to eleven regional transit systems, including DC Circulator:

- DC Circulator
- Metrobus
- Maryland Transit Administration Local Bus
- Alexandria DASH
- Fairfax Connector
- Fairfax CUE
- Arlington ART
- Loudoun County Transit
- PRTC OmniRide
- Prince George's County TheBus

<sup>2</sup> The 2016 DC Circulator survey question didn’t break the paper pass into sub-sections (one day, three day, seven day, and monthly) – it only asked if the rider used a one day, three day, seven day, or monthly pass.

- Montgomery County Ride On.

This pass can be purchased online, at one of WMATA’s five sales offices in the District of Columbia and Virginia, at one of Maryland’s three Commuter Stores, one of Virginia’s 11 commuter stores, or one of almost 400 retail outlets in the WMATA service area that sell SmarTrip cards.

### 3.2.4. Results

No disparate impact or disproportionate burden was found in this proposed fare media change.

- **Disparate Impact:** The difference in paper pass usage between minority riders and overall system riders is below DDOT’s Disparate Impact threshold of 15 percent, so no disparate impact was found.
- **Disproportionate Burden:** The difference in paper pass usage between low-income riders and overall system riders is below DDOT’s Disproportionate Burden threshold of 15 percent, so no disproportionate burden was found.

## 4.0 Necessity of Fare Adjustment

DDOT proposes eliminating the acceptance of paper passes that are valid only on DC Circulator. The paper passes account for less than two percent of total fare payments, but the process required for operators to validate the passes—including the training and enforcement time required to take the pass from the customer, write an effective date, and check the effective date on each pass presented—is labor-intensive and weak enforcement enables pass holders to potentially use passes beyond their expiration.

DC Circulator paper passes are currently only available for purchase via [CommuterDirect.com](http://CommuterDirect.com) or in-person at the Rosslyn Commuter Store in Arlington, Virginia.

The proposed rule does not change fare amounts for any fare media currently used to board a DC Circulator bus. It only proposes eliminating paper passes. Passengers will still have the option to pay for DC Circulator rides with all other current fare media, including the SmarTrip-based “7-Day Regional Bus Pass” sold by WMATA.