

May 31, 2021

Re: Lowering fares for working people and fixing Fair Pass access barriers (PRSO 2019-2022 Poverty Reduction Strategy Action Plan Mid-Term Status)

Dear Mayor Tory and members of the Executive Committee,

TTCriders is a membership organization of transit users. When the first phase of the Fair Pass was launched, we worked with a variety of agencies and individuals who receive Ontario Works and the Ontario Disability Support Program to promote the program, support people to sign up, and conduct a survey about barriers to accessing the Fair Pass.

Recent changes to the Fair Pass application process have created new barriers to applying for cards and loading funds. The Ontario Human Rights Commission wrote to the TTC and Metrolinx on April 6, 2021 about their concerns that PRESTO may present barriers to accessing Toronto's public transit for some *Human Rights Code*-protected groups, and that the PRESTO system "appears to create barriers for people using the City of Toronto's Fair Pass Program." ¹

Lowering fares is essential for economic and transit system recovery. We urge you to:

• Immediately expand Fair Pass eligibility to residents in receipt of housing supports

The \$3.1 million funding variance will support expanding the Fair Pass discount to 25,000 additional users.²

• Lower fares for working people

When City Council approved the Fair Pass program in 2016, it was designed to be expanded to all working poor people in Toronto who earn the Low Income Measure plus 15%, at an additional annual cost of \$25 to \$30 million. The PRSO mid-term report notes that 65% of Fair Pass users are still riding TTC, demonstrating that low income people depend on transit the most.

• Offer in-person Fair Pass sign up options, and offer sign-up clinics with Metrolinx so that Fair Pass cards can be applied for, validated, and loaded on the spot

The multiple steps to obtain a card, apply to the program, load a card, and validate it creates barriers. People without online access can only load their cards at subway stations or Shoppers Drug Marts, which are not present in many suburban areas. In addition, PRESTO cards must be

¹ http://www.ohrc.on.ca/en/news_centre/letter-ttc-and-metrolinx-human-rights-code-barriers-linked-presto

² https://www.toronto.ca/legdocs/mmis/2021/ex/bgrd/backgroundfile-166970.pdf



validated within 30 days. The City is requesting that Metrolinx allow real-time validation of cards during the online or phone application process, but there must be an interim solution.

The Fair Pass Phase 1 Evaluation Report (2019) found that the "majority of cardholders heard about the program in-person at a TESS Application Centre/ODSP office (48%), or through a TESS produced card or flyer in the mail (13%). These findings suggest that direct (in person) communication with staff may be the best method for this type of program." Other barriers identified in 2019 include language barriers and confusion about where to load funds.

• Offer the option of sending programmed, validated PRESTO cards by mail to ensure access to the program.

The Phase 1 Evaluation Report found that the majority of residents (approx. 75%) who were eligible chose to receive the Fair Pass via mail. PRESTO cards should be free for everyone.

• Act on removing access barriers that were identified in 2019, including more PRESTO load locations and stigmatizing light and sound for concession cards

The Phase 1 Evaluation Report (2019) documented barriers to accessing and using the Fair Pass that have not yet been addressed, including the different light and sound emitted when concession cards are tapped. This has disproportionately impacted Indigenous peoples' Fair Pass usage, due to potential stigma, embarrassment, and interactions with fare inspectors.

Toronto Accessibility Advisory Committee made similar recommendations on April 1, 2021:⁴

- "a. Explore the feasibility of in-person registration in accordance with public health guidelines;
- b. Expedite extending the Fair Pass program to residents who already receive other means tested supports such as rent geared to income housing, and
- c. Explore the feasibility of mailing programmed, validated PRESTO cards to facilitate and ensure access."

Sincerely,

Mule ph Pagell-

Shelagh Pizey-Allen, Executive Director, TTCriders

³ https://www.toronto.ca/legdocs/mmis/2019/ex/bgrd/backgroundfile-139482.pdf

⁴ https://www.toronto.ca/legdocs/mmis/2021/ex/bgrd/backgroundfile-166926.pdf