

July 11th, 2023

## **Re: Request for Presentation from the Toronto Transit Commission on Changes to Wheel-Trans Service**

Dear Chair and members of the Executive Committee,

TTCriders is a membership-based organization of transit users. We published a report in June 2023 that shares the perspectives of Wheel-Trans users who will be impacted by the “Family of Services” program, which seeks to shift up to 50% of Wheel-Trans users onto conventional TTC buses, streetcars, and subways for parts of their trips.<sup>1</sup>

**TTCriders supports the request from the Toronto Accessibility Advisory Committee for a presentation from the TTC CEO about the “Family of Services” Wheel-Trans program**, including what equity analysis was conducted, how people with disabilities were consulted, the how known or anticipated barriers to re-registration will be addressed; and comparing the projected financial costs of operating the Wheel-Trans under Family of Services and the previous Wheel-Trans service model.

Many long-time Wheel-Trans users who have relied on door-to-door service for decades will now be eligible for this service only under limited conditions. Wheel-Trans users are dismayed at being forced to “prove” their disability and express anxiety about the challenges of taking the conventional TTC, including finding space on vehicles that are more crowded due to service reductions, issues with broken elevators at stations, and medical conditions that involve significant risks from falling or being jostled.

### **Barriers to re-registering and appealing “Conditional” status**

Financial and other barriers prevent many Wheel-Trans users from re-registering for the service and from appealing their eligibility status: People only have 30 days from the date of their eligibility decision letter to submit an appeal.

Wheel-Trans users have reported to us that they re-registered but received a decision letter about their new eligibility status by mail **only two days before the deadline to appeal**, which is not enough time to obtain documentation from health care professionals. **The 30-day appeal period is not sufficient.**

Gathering supporting documentation for re-registration or appeal may require booking appointments with specialists, paying for a doctor’s note, and paying for attendant support. Less than 0.02% of Wheel-Trans applicants appeal their status, based on information

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<sup>1</sup> Read the full report here: <https://www.ttcriders.ca/wheeltransreport>



available from 2017 and 2018. Of the 17 appeals made to Wheel-Trans in 2017 and 2018, the original Wheel-Trans decision was upheld in 12 cases (71%).<sup>2</sup>

### **Wheel-Trans users need choice: Do not force people to use conventional TTC**

The TTC is preparing to make the “Family of Services” program mandatory for conditional users.<sup>3</sup> Soon, Wheel-Trans users will have no choice but to use the conventional TTC unless one of their conditions is present.

Although the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) mandates the creation of new eligibility categories for paratransit, **the AODA does not require that transit agencies make it mandatory to use the conventional system.**<sup>4</sup> This is a policy choice: We urge you to protect Wheel-Trans service for all who need it.

### **The “Family of Services” is a plan to reduce costs, not enhance access**

The TTC has a diversion target of shifting 50% of current unconditional Wheel-Trans users on the Family of Services model by 2025.<sup>5</sup> The TTC has stated that the shifting Wheel-Trans riders on to the Family of Services is meant to “free up resources to serve riders with unconditional eligibility.”<sup>6</sup> Operations funding from the provincial or other levels of government is needed so that Wheel-Trans can expand service to accommodate new users. This is the only way to ensure that the spirit of the AODA is upheld and enforced.

### **What if my health changes? Clarifying when Wheel-Trans users can re-apply**

There is also no firm direction on when users can re-apply if their health status changes. Some health conditions can change rapidly and making Family of Services mandatory when there are no clear guidelines on how users experiencing changes in their disability or condition can re-apply or appeal a status beyond the ‘30 day’ window is unacceptable.

Sincerely,

TTCriders Accessibility Committee

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<sup>2</sup> In 2017, 10 appeals were made out of 13,360 received applications to Wheel-Trans. In 2018, 7 appeals were made out of 5511 received applications. <https://www.toronto.ca/legdocs/mmis/2018/ex/bgrd/backgroundfile-118165.pdf>

<sup>3</sup> [https://ttc-cdn.azureedge.net/-/media/Project/TTC/DevProto/Documents/Home/Public-Meetings/Board/2023/July-12/4\\_WT\\_Transformation\\_Program\\_2023\\_Update.pdf?rev=9b40fceb094a4c35be3095b13a1c2dfa&hash=9976C060FFAFCCB0D680FA20DB094033](https://ttc-cdn.azureedge.net/-/media/Project/TTC/DevProto/Documents/Home/Public-Meetings/Board/2023/July-12/4_WT_Transformation_Program_2023_Update.pdf?rev=9b40fceb094a4c35be3095b13a1c2dfa&hash=9976C060FFAFCCB0D680FA20DB094033)

<sup>4</sup> <https://www.ontario.ca/laws/regulation/110191>: (3) A specialized transportation service provider may deny requests for specialized transportation services to persons who are categorized as having temporary eligibility or conditional eligibility if the conventional transportation service is accessible to the person and the person has the ability to use it. O. Reg. 191/11, s. 63 (3).

<sup>5</sup>

[https://ttc-cdn.azureedge.net/-/media/Project/TTC/DevProto/Documents/Home/Public-Meetings/Board/2016/February-25/Reports/W-Trans\\_10\\_Year\\_Strategy\\_Update\\_combined.pdf?rev=d7d2996b385d4dcabea47c7b2321780f&hash=39102B5446AA4D87EA3DB03A68384713](https://ttc-cdn.azureedge.net/-/media/Project/TTC/DevProto/Documents/Home/Public-Meetings/Board/2016/February-25/Reports/W-Trans_10_Year_Strategy_Update_combined.pdf?rev=d7d2996b385d4dcabea47c7b2321780f&hash=39102B5446AA4D87EA3DB03A68384713)

<sup>6</sup> <https://www.ttc.ca/en/wheel-trans/wheel-trans-10-year-strategy/initiatives>

The TTC has *estimated* that its operating budget was reduced by \$65.33 million due to the Family of Services model between 2017 and 2021. *In 2016*, the TTC forecast Wheel-Trans operating budget reductions of \$300 million over 10 years as a result of implementing the program.