



# Ombudsman Toronto Report

No refunds for discontinued TTC tickets and tokens: An investigation behind how the decision was made



Ombudsman  
Toronto

June 17, 2026



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Ombudsman  
Kwame Addo

Acting Deputy Ombudsman  
Meredith Gayda



## Land Acknowledgement

At Ombudsman Toronto, we have a responsibility to uphold and ensure fairness in our local government. We understand that this must be done with a respectful and culturally responsive approach and we commit to ongoing learning, unlearning, engagement and relationship-building in order to do so.

We acknowledge that we are on the traditional territory of many nations, including the Mississaugas of the Credit, the Anishinaabeg, the Chippewa, the Haudenosaunee and the Wendat Peoples, and that this land is now home to many diverse First Nations, Inuit and Métis Peoples. We also acknowledge that Toronto is covered by Treaty 13 signed with the Mississaugas of the Credit and the Williams Treaties signed with multiple Mississaugas and Chippewa bands. We are here because this land has been colonized and we recognize the ongoing harm done to Indigenous communities by this colonial system, including the effects of broken treaty covenants.



## **African Ancestral Acknowledgement**

Ombudsman Toronto is committed to continually acting in support of and in solidarity with Black communities seeking freedom and reparative justice in light of the history and ongoing legacy of slavery that continues to impact Black communities in Canada. As part of this commitment, we recognize that not all people came to these lands as migrants and settlers. Specifically, we wish to acknowledge those of us who came here involuntarily, particularly those brought to these lands as a result of the Trans-Atlantic Slave Trade and Slavery. We pay tribute to those ancestors of African origin and descent.



## Ombudsman's note

Staff across the entire Ombudsman Toronto office worked on this investigation. The primary investigative work was conducted by Gemma Kerr, Investigator, Firas Ayoub, Investigator and Mital Patel, Investigator. It also involved the work of Luke Brown, Investigations Counsel, Janina Fogels, Deputy Ombudsman, Anna Gatova, Team Lead Investigations and Resolutions, Danielle Augustus, Complaints Analyst, Maureen Doolub, Complaints Analyst, Melissa Yu Vanti, Communications and Engagement Consultant, Alexandra DiGioseffo, Communications and Engagement Consultant, Jasmeen Toor, Research and Policy Consultant, Janet Eide, Operations Coordinator, Darise Mohammed, Administrative Assistant to the Deputy Ombudsman, Housing and Sandra Paulo, Executive Assistant to the Ombudsman.

I also want to thank the Toronto Transit Commission Board of Commissioners, Toronto Transit Commission staff and City of Toronto staff for their assistance during this investigation.

**Ombudsman**  
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# Executive summary

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“I cannot afford for [the] TTC to take my money and not provide me the 100 rides they owe me. I was not asking for a handout.”

— Rider who had approximately \$300 in discontinued fares saved

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## Executive summary

In late October 2024, the Toronto Transit Commission (TTC) announced that it would stop accepting tokens and tickets at the end of that year. It also said there would be no refunds, credits or exchanges for the discontinued fares (the refund decision). Within days, riders contacted our office with concerns about the TTC's decision. In December 2024, the TTC Board of Commissioners voted to allow riders additional time, extending the deadline for using the discontinued fares to June 2025 (and December 2025 for Wheel-Trans riders using the Wheel-Trans system). Even with the extension, we heard from complainants, some of whom had saved hundreds of dollars' worth of the discontinued fares and were unable to use them before the deadline.

We contacted the TTC to get more information about the refund decision. In our initial inquiries, staff were unable to explain who made the decision or how it was reached. I then began an investigation into how the TTC arrived at the refund decision and whether the decision-making process was fair. I did not look at the fairness of the TTC's decision to discontinue these fares, or its decision not to provide refunds or exchanges.

Our investigation could not determine who made the refund decision, when the decision was made or how it was reached. Some board members and staff pointed to the board, while others believed it was staff. The TTC could not produce records to support either account. Board members and staff were also at odds about who should have made the refund decision in the first place.

A TTC executive told the board in October 2024 that there were approximately 6.7 million tokens and 573,000 tickets still in circulation, with an estimated a value of \$24 million. The TTC acknowledged this wouldn't be the total amount of the refunds, as many of these fares had been lost, damaged or added to personal collections. During interviews, board members and staff also stated that there were logistical and financial challenges to authenticating fares and implementing a refund or exchange program for discontinued tickets and tokens.

We recognize that the TTC has significant fiscal pressures. However, while these challenges are understandable, the TTC failed to take steps to understand the impacts on riders. We found no evidence it collected data, consulted with the public or conducted an equity impact analysis.

More broadly, this investigation showed the TTC lacks a consistent process or practice for making certain fare-related decisions. It also revealed larger concerns about the



fairness of the TTC's decision-making and record-keeping. Although our investigation focused on a single issue, one executive told us that they could “swap this [refund] issue out and give you ten others and you'd be asking me the exact same questions today.”

I made eight recommendations to the TTC to strengthen its decision-making and improve transparency to the public.

## What we did

On Aug. 6, 2025, I launched this investigation into how the TTC made the refund decision. The investigation focused on:

- the TTC's process leading to the refund decision, including how the TTC assessed the refund decision against relevant policies and equity considerations
- how the TTC communicated and engaged with the public, both on the refund decision and on the requests for refunds from individual riders

My office interviewed 37 people, including TTC board members, current and former TTC staff, City staff, advocates, researchers and riders who complained to our office. We also reviewed hundreds of internal and public TTC documents.

## What we found

- No one we spoke with, from TTC staff to board members, could agree who made the refund decision. The TTC did not follow a transparent process, as it did not consider the decision publicly and it failed to produce any record of the refund decision.
- Neither staff nor the board could clearly set out the criteria for when this type of refund decision and certain fare decisions should be made by the board and when they should be made by staff, with the exception of fare increases which are set by the board. The TTC does not define system-wide fare change decisions, however this can include refund decisions, adding or discontinuing fare types and changing the conditions of use for fares. The TTC does not have a documented process to guide these types of fare decisions.
- The TTC failed to gather any data or consult with the public to give them an opportunity to share their thoughts on the impact of the refund decision. This would have gone part way towards promoting more informed decision-making.



- The TTC did not conduct any equity impact analysis to understand and mitigate the impact of the refund decision on riders. Some staff demonstrated a lack of understanding and empathy towards riders who had accumulated large amounts of discontinued fares.
- The TTC did not consistently communicate with the public that there would be no refunds or exchanges for discontinued fares, even though some riders and staff believed that tokens did not expire. In fall 2019, the TTC put out communications that included a brief mention that it would be discontinuing tickets and tokens and would not offer refunds. The TTC said nothing more on the issue of refunds until late 2024.
- The TTC denied all requests for refunds for discontinued fares, including for riders who said that they had exceptional circumstances.
- The TTC justified its decision not to provide refunds by referring some riders to a fare policy document that does not exist. A refund policy that some staff relied on was outdated and unknown to some staff who were involved in considering refund requests.
- Staff never submitted some reports that the TTC board requested. Notably, in April 2019 the board requested that staff report on the impact of refunding tokens. Staff never completed the report and no one could explain why.

## Recommendations

I made eight recommendations to strengthen how the TTC handles its decision-making about fares, process for equity analyses, tracking of board requests to staff, development of public-facing rider policies and process for approving and updating policy documents.

The TTC board and staff accepted all eight of my recommendations.

## Conclusion

The TTC provides an essential service and operates one of the largest transit systems in North America. For many riders, it is their only way to travel across the city for work, leisure and to access essential services.

This investigation began with a simple question about how the refund decision was made. However, TTC board members and staff shared conflicting information on who made this decision, and no one could provide a record documenting it. These gaps point to broader concerns about transparency and accountability within the organization.



Without stronger processes and criteria to guide these types of fare decisions and to enhance transparency and accountability, the TTC risks losing public confidence in the fairness of its decisions.

Although, some staff expressed a commitment to equity, the TTC made the refund decision without collecting data, consulting the public, or assessing or understanding the potential impact on riders, including equity-deserving groups.

Public institutions must be able to explain how decisions are made, who made them and how it considered the communities that were affected.

Although this investigation focused on the process leading to the refund decision, it uncovered broader systemic issues at the TTC. Once implemented, my recommendations will strengthen decision-making at the TTC and ensure it is serving the public in a fair, transparent and accountable way.



# Introduction



## Introduction

1. On Oct. 24, 2024, the Toronto Transit Commission (TTC) issued a news release stating that it would stop accepting tokens (single adult fares) and single-ride senior and student tickets as of Dec. 31, 2024. In this report, these are referred to as discontinued fares. In the same news release, the TTC also stated that it would not issue refunds, credits or exchanges for these fares.
2. The deadline gave riders just over two months to use their remaining tokens and tickets. Soon after the announcement, riders began complaining to Ombudsman Toronto that the TTC was not providing refunds or exchanges for these discontinued fares. Some riders were concerned that the TTC had denied their requests for refunds or exchanges without adequately considering what they felt were unique or exceptional circumstances.
3. On Dec. 3, 2024, the TTC Board of Commissioners adopted a motion to extend the deadline for riders to use soon-to-be-discontinued tokens and tickets to June 1, 2025. Wheel-Trans riders using the Wheel-Trans system could use these discontinued fares until Dec. 31, 2025. Although the extension addressed some aspects of riders' concerns, several told our office they still had more tokens and tickets than they could use by the extended deadline.
4. We contacted the TTC to better understand why it decided not to provide refunds, credits or exchanges (referred to as the refund decision in this report) for the discontinued fare types. We first tried to understand what the board and staff had considered when they made the refund decision. However, in response to our initial inquiries, the TTC failed to provide clear answers on who made the refund decision or whether those responsible for the decision had the authority to do so.
5. As the TTC could not provide clear answers about its decision-making process, I launched this investigation on Aug. 6, 2025, to determine what happened and to examine whether the TTC's decision-making process was fair.



# About Ombudsman Toronto and our investigation

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Our investigation assessed the fairness of the TTC's decision-making processes, and the implementation and administration of any applicable policies related to the refund decision.

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## About Ombudsman Toronto and our investigation

6. Ombudsman Toronto is an independent and impartial accountability office with the authority to review and investigate complaints about the administration of the City of Toronto and most of its divisions, agencies, boards and corporations. The office focuses on administrative fairness, ensuring there is fair process, fair outcome and fair treatment in City decisions or processes. We also help the City fulfil its housing rights obligations through investigations, reviews and by making recommendations.
7. When organizations uphold the principles of administrative fairness – clear communication, transparency, timeliness, access and respect – people can trust that they have been treated fairly. These principles are the foundation of accountable government and are essential to maintaining public confidence in the City and the TTC.

## Investigation scope

8. My investigation focused on how the TTC decided not to provide refunds or exchanges for tokens and tickets. Although the TTC had been considering ending the acceptance of discontinued fares for many years, our investigation covers the period from April 11, 2019, to Dec. 3, 2024. We chose April 11, 2019, because that was the date the board adopted a motion directing TTC staff to report back in June 2019 on the impacts of potentially providing refunds for tokens. We chose Dec. 3, 2024, as the end date because that was the day the board voted to extend the deadline to accept the discontinued fares.

## What we wanted to understand

9. My office wanted to understand the TTC's process that led to the refund decision, including how the TTC assessed the refund decision against relevant policies and equity considerations, as well as how the TTC communicated and engaged with the public on the refund decision and individual rider refund requests.

## What we did not examine

10. Our investigation did not examine the fairness of the TTC's decision not to provide refunds or exchanges or why it decided to discontinue tokens and tickets. We recognize that the TTC has fiscal pressures and that ridership dropped significantly during the COVID-19 pandemic. Instead, our investigation assessed the fairness of the



TTC's decision-making processes, and the implementation and administration of any applicable policies related to the refund decision.

11. Our focus is on the authority, policies and processes that the TTC followed when making the refund decision.
12. We did not consider day passes during this investigation. The TTC's announcement mentioned that day passes would also be discontinued. However, day passes clearly stated that refunds would not be available for this fare type.

## How we investigated

13. My investigation included:
  - A comprehensive review of thousands of pages in more than 500 documents, including City of Toronto legislation, board records (e.g., decision documents, staff reports), TTC by-laws, TTC policies, and TTC internal and public documents
  - Interviews with 37 people: including current and former TTC staff (staff), members of the TTC's executive team (executives), TTC staff members such as heads, directors and managers (management), board members, City staff, advocates, researchers and riders who complained to our office<sup>1</sup>
14. While overall cooperation from the TTC and the board was good, my investigators were required to send multiple follow-up requests for specific documents. While we recognize that staff have busy roles, this affected the progress of the investigation and delayed some interviews until we received and could review relevant documents.

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<sup>1</sup> To protect the anonymity of current and former staff, all TTC staff that we spoke to are referred to as TTC staff.



# **Toronto Transit Commission and its Board of Commissioners**



## Toronto Transit Commission and its Board of Commissioners

15. This section provides an overview of the TTC and its board. These descriptions are not exhaustive — they are intended to provide the reader with basic information to help understand the report.
16. The TTC is a City agency that operates a public transit service across Toronto, “which is the largest public transit system in Canada and the third largest in North America.”<sup>2</sup>
17. The TTC is overseen by the board, made up of 10 members: six are members of Toronto City Council and four are members of the public.
18. The board oversees the TTC’s mandate, and board meetings are held in public. At each board meeting, staff submit detailed reports providing information and recommendations about items on the agenda. The board is required to reach a majority vote for an item to pass and may bring a motion to amend staff recommendations.
19. The board appoints the CEO who leads the organization’s staff.

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<sup>2</sup> [City of Toronto website: Toronto Transit Commission](#)



# Impact on riders

“Why somebody who's living on ... a disability pension ... would have a stockpile of 300 tickets or tokens doesn't really compute for me ... [I] don't really understand that ... there was certainly more than enough time to either sell them if they wanted to do that or to use them up.”

— TTC staff member

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“I had those tokens saved for my daughter to use when she started university.”

— Rider with a disability and father to two children who had approximately \$800 in discontinued fares saved



## Impact on riders

20. In 2012, the TTC started a process of modernizing fare collection by partnering with Metrolinx, a provincial agency, for PRESTO to deliver their automated fare collection system. The TTC's agreement with Metrolinx stated that the TTC would discontinue tokens and tickets.
21. In 2019, the TTC stopped selling the discontinued fares in stations. However, the TTC continued to sell discontinued fares in bulk to social service agencies. Third-party retailers also continued to sell tickets until July 2022 and tokens until March 2023.
22. In 2022, the TTC ended the bulk sale of discontinued fares to social service agencies. The TTC contacted bulk customers to let them know that the bulk sales program would be transitioned to PRESTO. The introduction of single use PRESTO tickets paved the way for the TTC to stop accepting discontinued fares.
23. In our initial discussions with staff, they told us another reason for discontinuing these fares was because the new light rail transit lines could not accept older fare types such as tokens and tickets. Staff explained that the discontinuation of these fare types would ensure uniform fare collection across the system and reduce fare evasion by closing fare gates where discontinued fares were collected.
24. In July 2024, staff submitted a report to the board which noted that discontinued fares comprised approximately 0.1 per cent of fare usage on the TTC. During a board discussion in October 2024, an executive said that there were approximately 6.7 million tokens and 573,000 tickets still in circulation, with an estimated value of approximately \$24 million. During our preliminary discussions with TTC staff, they explained that they did not expect that all these fares would be used by the deadline, as they anticipated that some discontinued fares may have been lost, damaged or added to personal collections.
25. During the October 2024 board meeting and in our preliminary discussions, the TTC explained the financial and logistical challenges of implementing a refund or exchange program, including the staff and resources required to authenticate fares and to implement this.
26. Within days of the TTC's Oct. 24, 2024, public announcement, we started to hear complaints from riders about the refund decision. In the following months, we continued receiving complaints that the TTC was not providing refunds or exchanges for the discontinued fares.



27. The majority of complainants were concerned that they did not have enough time to use their soon-to-be worthless tokens and tickets. Many told us they had a sizeable number of discontinued fares: several had over \$800 worth of fares, one rider reported over \$1,700 worth of fares and one non-profit organization had approximately \$22,000 worth of fares. Many complainants told us that they could not afford to lose out on their fares.
28. Several complainants explained that because of health concerns and other challenges, they were no longer regular TTC users and therefore used their discontinued fares less often. Others said their use of the TTC decreased due to changed work arrangements during the COVID-19 pandemic.
29. Even after the board extended the deadline to June 1, 2025, we heard from new complainants through the fall of 2025 who expressed concerns about the TTC's decision not to provide refunds or exchanges for the discontinued fares.
30. One complainant told us they stopped using the TTC regularly due to serious health issues that left them bedridden for a period. They said they continue to experience long-term effects that have severely impacted their ability to work, describing it as a "challenging and financially devastating time."
31. When this complainant heard the TTC's October 2024 public announcement, they requested a refund from the TTC for over \$300 worth of discontinued fares that they were unable to use prior to the deadline. The TTC denied the complainant's request and did not provide detailed reasons for its decision. The complainant told us that they were unable to use all their fares by the extended deadline: "I cannot afford for [the] TTC to take my money and not provide me the 100 rides they owe me. I was not asking for a handout."
32. Another complainant who contacted our office explained to us that they support their family on a disability pension. They had saved approximately \$800 worth of tokens for their daughter to use when she started university. The complainant and their daughter were unaware that the TTC had discontinued these types of fares. When their daughter began university in the fall of 2025, staff told her that the fares were no longer current.
33. The complainant contacted the TTC to request a refund, and the TTC denied their request. They told us: "All I'm looking for is my money ... I'm not asking [the TTC] to get some free rides, but we're asking, at least give me what I paid for."
34. An executive director of a non-profit organization that supports vulnerable clients contacted our office. Their organization had not purchased discontinued fares through the bulk sales program. They explained that their organization had built up a reserve of



approximately \$22,000 worth of tokens to support their clients with their transportation costs. The executive director told us that they were unable to distribute all the tokens to clients prior to the TTC's deadline.

35. The executive director told us that, several years ago when they heard about the phasing out of tokens, they called the TTC to ask about getting a refund or credit for the organization's large number of tokens. They said that TTC staff advised them to use up the organization's tokens as no refunds would be issued. They told us that it was not possible for their organization to use the tokens it had before the deadline and that they did not contact the TTC again after that, as they had "lost faith" in the TTC's process. They explained that their organization is historically underfunded and that they could not afford to lose the money. They said that their organization is "now left holding a large quantity of tokens that have effectively become worthless — tokens that were purchased in good faith under a system that never suggested they would expire."



# The decision not to provide refunds for discontinued fares

“The question of whether it should go to the board or not, we can have a lively and long conversation. We don't have something that guides us that says it shall or must.”

– TTC executive

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“We should have had public consultations on this topic. I don't think it should be a room full of just TTC folks talking about it. We should have heard from residents. We should have heard from community organizations.”

– TTC staff member



# The decision not to provide refunds for discontinued fares

## Who made the refund decision and when

- 36. We spoke with 30 people at the TTC, including board members and many levels of staff. These staff were current and past TTC executives, directors, heads of departments and managers. No one could direct us to a record of the refund decision.
- 37. Twelve witnesses, including board members, executives and management, believed that the board had made the refund decision.
- 38. Seven TTC executives and management believed that staff had made the refund decision.
- 39. Eleven witnesses, including one board member, executives and management, were unsure who made the refund decision. One executive said that they were unsure whether the TTC had even made a decision.

Table 1: Perceptions of who made the refund decision, by interviewee role

| Interviewee                               | Decision was made by the TTC board | Decision was made by TTC executives | Decision-maker was unclear |
|---|------------------------------------|-------------------------------------|----------------------------|
| TTC board members, executives, management | 12                                 | 7                                   | 11                         |

## Board consideration of the decision

- 40. We tried to find out if the board had made the refund decision.
- 41. In April 2019, after a discussion about discontinuing fares, the board directed staff to report back in June 2019 on the “impacts of refunding tokens for as long as customers have them available for return.”
- 42. In May 2019, staff briefed the board about refunds for discontinued fares. This briefing note provided examples of when the TTC had historically refunded fares that had been



discontinued. It did not ask the board to make a decision about refunding discontinued fares.

43. In June 2019, staff told the board they would present it with a refund plan later that year. We did not find any record that staff reported back to the board with a refund plan.
44. After this mention in 2019, we could not find any board record of an update or decision about refunds or exchanges for discontinued fares until after the Oct. 24, 2024, announcement that the TTC would not offer refunds for unused tokens and tickets.
45. Several days after the public announcement, a number of board members asked staff at the Oct. 29, 2024, board meeting why the TTC was not offering refunds or exchanges for the discontinued fares. At the board meeting, staff explained that the cost of tokens and tickets had increased over the years, making it difficult to determine how much riders originally paid and could result in the TTC reimbursing riders more than they originally paid. They also said that the TTC would be required to pay PRESTO a commission for any exchange program to PRESTO fares. The board simply discussed the issue, and no motion or decision was brought forward or decided about refunds.
46. A board member told us they had assumed the decision had already been made before October 2024. They said: “I assumed that somewhere the decision had been made to not provide refunds. I just assumed we had gotten a recommendation so if we didn’t that is surprising.”
47. We found no record that a recommendation on refunds was brought to the board or that the board made any decision regarding refunds. One board member, who believed the board made the refund decision, told us: “I could not tell you why there's a challenge to find [a board decision to not provide refunds for discontinued fares.] A lot of this stuff is public record, right? So, I imagine it wouldn't be too difficult.” Another board member acknowledged: “For sure we need to be more clear so people can tell what decision's been made.”
48. A staff member told us all the different places they had looked for the refund decision:

I looked at what got finalized and went to the public and went to the board and ... I couldn't see any statement on refunds in there ... I don't know what happened, I don't know whether the [refund] decision wasn't made or they weren't ready to communicate it. I don't know.



## Staff consideration of the refund decision

49. We then examined if staff made the refund decision, as seven witnesses we interviewed believed the refund decision had been made by executives.
50. In 2022 and 2023, staff developed several briefings for the executive team that outlined some financial implications and logistical challenges of providing refunds for discontinued fares. Some of the briefings noted that a decision on refunds was required but did not specify if that meant it was required from the executive team or the board.
51. Minutes from the June 2022 executive meeting state that staff “recommended to proceed with no refunds or exchanges for TTC legacy fares (with exceptions).” These exceptions were not defined. The minutes recorded that staff would send the CEO a communications plan and a briefing note for the board relating to refunds. No one that we asked could find or recall any briefing note to the board about this.
52. A January 2023 briefing to the executive team recommended stopping the acceptance of tokens one year after they stopped being sold to “eliminate the need for refunds.” July, September and October 2023 briefings were deferred. In May 2024, staff advised the executive team that “once a decision was made to retire legacy fares, that the following needed to be considered”:
  - Reimbursement: Board questions and concerns will need to be considered.
  - Rules/guidelines will need to be established if reimbursement approach is sought.
  - Potential to accept refunds for legacy fare media – exchange for a PRESTO card with same value.
53. We spoke with many of the executives and management who were invited to this meeting. Staff shared contradictory information about what was discussed during this meeting and recorded in the meeting minutes. Many of them were at odds about whether the refund decision had been reached prior to or after this meeting.
54. The minutes do not record if the refund decision was for the executive team or the board. The executive team meeting minutes contain no record of a decision having been made.
55. We attempted to determine which staff may have been involved in informing the refund decision, even if they were not the final decision-maker. Some staff from the corporate services group believed that employees from the communications, marketing and customer experience group would have informed this type of decision. Some



communications, marketing and customer experience staff said that the responsibility would have rested with the corporate services group.

56. One executive was unsure if a formal decision had ever been reached. They said: “It’s really not clear to me that a decision was made.”
57. Staff told us that in 2022 or 2023, they explored with Metrolinx the feasibility of an exchange program through PRESTO for tokens and that they believed this option was not pursued as it was not financially viable. We could not find a record of a staff or board decision not to pursue the PRESTO exchange option.
58. We found no record that staff had made the refund decision.
59. No board members or staff could explain why no one could find a record of the refund decision. None of the witnesses could point us to any document or record of the refund decision. One member of management told us: “I was just surprised that it had gone forward ... to see [the public announcement] I was just surprised.”

## **When the refund decision was made**

60. Board members and staff we spoke with gave very different timelines for when they thought the refund decision had been made. Dates ranged between 2017 and 2024.
61. There was a high turnover of staff during the period under investigation. Some board members and staff thought that the refund decision had been made prior to when they started their role or joined the TTC. Other staff believed that the refund decision had been made after they had left their role or the TTC.

## **Who made the refund decision and when: analysis**

62. We conducted a thorough review of thousands of pages of documents and spoke with many staff and board members to try to determine who made the refund decision. No one was able to identify who made the refund decision or provide documentation confirming whether it was made by the board or staff.
63. There was no consensus amongst witnesses, and a board member believed the refund decision may have been made years prior to October 2024. It raises serious concerns that no one could explain who was responsible for such a high-impact decision.



64. Board members and staff were unable to provide confirmation about whether a formal decision had been made, by whom or when. While it is possible that a decision may be documented somewhere, neither TTC staff nor my investigators could find any record supporting it. Given the significance of the refund decision, I believe the TTC should have ensured this information was properly documented and publicly available.
65. In April 2019, the board requested that staff produce a report about the impact of refunds for discontinued fares. Staff did not produce the report and did not provide any updates on its status. No one we spoke with could explain what had happened and why no report went to the board.
66. This breakdown reveals gaps in how the TTC tracks and completes board-directed work. I believe that staff should be responsible for ensuring that board requests are monitored, resolved, and acted on, including providing timely updates when delays occur or when a request is no longer relevant. Even if board priorities change at the beginning of a new board term, it should be clear to staff, the board, and the public what prior board-directed work the TTC is no longer reporting on or pursuing. Inconsistent oversight risks undermining transparency and accountability in decision-making.
67. Briefings to the executive team from 2022 through 2024 that mention refunds are not clear about who should make the refund decision. We asked staff to help us understand what was discussed during these meetings. However, staff shared conflicting interpretations and did not record a decision in the minutes.
68. We recognize that staff may have had difficulty recalling details from many years ago or knowing what decisions were made prior to taking on their roles at the TTC. We also recognize the high turnover in executive-level positions during the period under investigation. These challenges underscore the need for the TTC to maintain clear records and ensure transparent decision-making rather than relying on institutional knowledge and memory.
69. Although staff speculated that cost was the reason for not proceeding with a token exchange program, no one we asked could point to a record of a decision not to pursue a PRESTO exchange. This is another undocumented decision at the staff or board level.
70. The TTC chose not to issue refunds or exchanges for tickets or tokens without recording who made the actual decision and when the refund decision was made. This absence of documentation weakens accountability for decision-making. The board and staff should ensure that significant decisions are properly recorded and attributed.



## Who should have made the refund decision

71. We sought to understand whether the decision fell within the role of staff or required board approval. To do so, we interviewed staff and board members and reviewed relevant legislation, bylaws, TTC policies and processes.
72. Board members and staff speculated about who they thought had made the refund decision. We also asked them who they thought *should* have made the refund decision. Board members and staff shared different opinions. One member of management said: “I will always err on the side of being open and transparent ... I think it's important for the board to have visibility to that, and at least be offered the decision or the ability to make a decision ... no or yes.”
73. Several board members and some executives said that, regardless of what had happened in this situation, the board should be making system-wide refund decisions. One executive acknowledged that in hindsight, executives should have made a clear recommendation that the board needed to make a decision on the refund issue. They said: “I’m not going to hide behind the fact that there should have been a clearer recommendation [to the board].”
74. Some staff believed that executives could make the refund decision. Other staff were unsure about who was authorized to make the refund decision. One executive said: “The question of whether it should go to the board or not, we can have a lively and long conversation. We don't have something that guides us that says it shall or must.”
75. One executive questioned whether the board needed to make the refund decision, as the TTC did not issue any refunds and therefore there was no negative financial impact to the TTC. This same executive did not consider the impact of the TTC keeping \$24 million that riders held in fares as they felt it was not their responsibility to do so.

## What authority did the decision-maker have and what processes did they follow to exercise that authority

76. The *City of Toronto Act, 2006*, “provides the City with authorities to establish, dissolve, delegate powers and duties and determine the governance of its agencies and corporations with certain limitations.” Under the act, the TTC sets fees and charges without needing the approval of the City. It does not include additional information to guide decisions relating to refunds.



77. The Toronto Municipal Code, Chapter 279, outlines City Council’s role in approving the TTC’s annual operating budget, including approving expenditures and revenue. It is also silent on refund decisions.
78. TTC by-law No. 1 “regulates the use of the TTC local passenger transportation system” and was approved by the board on Jan. 21, 2009. It outlines that fares are set by the board. It defines “fare media” as “any ticket, token, pass, transfer or other fare media issued by and acceptable to the TTC.”
79. TTC by-law No. 1 states that fares are “valid in accordance with the conditions of use of the fare media and as set out in this by-law.” Conditions of use are “printed on fare media.” Neither the tickets or tokens considered in this investigation had conditions of use printed on them stating that refunds or exchanges would not be provided. Although fares are set by the board, by-law No. 1 does not outline if this would include something akin to the refund decision.
80. The TTC by-law that governs board proceedings “established the rules for all board and committee meetings” and was most recently updated by the board on April 11, 2024. It outlines board and TTC committee meeting rules of procedure, including voting rules.
81. This by-law does not set out which items staff must bring to the board for approval.
82. According to the TTC’s website, the board “oversees matters of policy, planning TTC services; constructing, maintaining and operating the system; and expanding services and facilities.” An executive told us that TTC management, on the other hand, is responsible for the day-to-day implementation of both the TTC’s policies and its strategic objectives. They told us that the assumption is that any fare decision that would have a significant impact on the public would be made by the board.
83. We looked to see whether the TTC has a Council-approved document, such as a relationship framework, which defines “the relationship between the City and the agency and sets out Council’s delegation of authority.”<sup>3</sup> The TTC and the City do not have a relationship framework.
84. Our office requested any additional documents that outline the TTC’s governance structure to help us understand the role and responsibilities of the board and the role and responsibilities of the TTC’s staff. The TTC shared City and TTC webpages. Both webpages state that the board is responsible for establishing fare levels, but neither

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<sup>3</sup> [City of Toronto website: Legislation, Bylaws & Policies](#)



set out who is responsible for making decisions about refunds or exchanges for entire fare types.

85. We looked to see whether the board had authorized staff to make the refund decision. We did not find any authorization other than for individual refund requests.
86. The TTC's "refund of fare media/excess fare receipts" policy (refund policy) outlines when staff can issue refunds for single fares. The board approved the refund policy in 1994. The refund policy states that no refunds are provided for "current fare media" (undefined); however, refunds are allowed for "non-current fare media" (undefined) for one year after expiry. The refund policy does not address the discontinuation of a type of fare, such as tickets or tokens.
87. The refund policy states that executives from the corporate services group are responsible for the policy. Executives we spoke to from that group either did not know about the refund policy or described it as "antiquated."
88. During the investigation, a member of management shared a copy of a marginally different version of the refund policy. Neither version has a date on it, and neither is a public document. One version of the policy says that the Chief Financial Officer has responsibility for this policy, while the other version says that the Head of Finance and Treasurer is responsible for this policy. Staff told us that the latter role does not currently exist at the TTC.
89. Many staff we spoke with were unfamiliar with the refund policy, including an executive listed as responsible for the refund policy. Executives listed as responsible for one version of the refund policy told us that they were unsure what "non-current fare media" means. One member of management told us that they believed the refund decision aligned with the refund policy because "when this decision was made ... the fares ... in question, like tokens and tickets ... were current [fare media]."
90. Two other members of management told us that there was a policy "possibly developed in the 80's," that said the TTC does not provide refunds. They further explained that they had never seen that policy but had heard that it existed and, from their perspective, the refund decision aligned with it.



## Who should have made the refund decision: analysis

91. TTC legislation, by-laws and policies do not provide clear guidance on the process for making a decision like the one at the centre of this investigation. Board members and staff expressed differing views on who was authorized to decide on refunds. In the absence of clear guidance or processes, the TTC did not establish a shared understanding of decision-making roles and responsibilities, leaving it up to individuals to interpret how decisions should be made. Many people we interviewed relied on unverified assumptions about decision-making authority, rather than confirming who had the authority to decide.
92. The refund policy appears to say that refunds would be allowed for fares, such as tokens and tickets after they were discontinued, because they would then be “non-current fare media.” However, we could not determine if the refund decision was made by staff or whether the refund policy would have factored into the refund decision. Some staff did not know about the refund policy. Others were aware of the policy but had not seen it; nevertheless, they believed it justified the refund decision.
93. In my opinion, the refund decision was significant enough, given its potential impact on the public, that I believe the board should have considered the refund decision, allowing the public to engage through an open and transparent process. The TTC failed to produce any record that the board approved the refund decision or that the board had authorized staff to proceed. This lack of clarity on both process and lack of documentation points to gaps in accountability and raises significant concerns about administrative fairness.

## Process for the refund decision

94. When asked, the TTC could not explain or point us to a documented process, policy or path that guided the refund decision. This includes any information or tools the board or staff would have needed to come to the refund decision.
95. We wanted to know if the TTC had gathered relevant information to inform the refund decision, so we asked questions about the refund decision’s potential impact on



equity-deserving groups,<sup>4</sup> what data the TTC had collected and whether there were public consultations related to the refund decision.

## Whether equity considerations informed the refund decision

### TTC fare policy goals

96. In May 2021, the board endorsed seven fare policy goals to guide the creation of a 5-year fare policy. The seven fare policy goals relate to affordability and equity, simplicity and accessibility, integration, mode of choice, maximizing benefits, collaboration and transparency and financial sustainability.
97. The TTC's fare policy goal focusing on affordability and equity states that: "The price of public transit should reflect customers' ability to pay, minimizing cost as a barrier to travel wherever possible." Another fare policy goal states that: "Advancements in technology should not leave customers behind." Yet another goal calls for transparency in settings fares, stating that: "The process of establishing fares will be conducted publicly to ensure agency accountability and enhance public trust. Rationale for policy should be clear to customers."
98. The TTC did not provide any evidence to show whether the fare policy goals factored into the refund decision. No one that we asked knew or could recall whether the fare policy goals informed the refund decision.
99. We heard from a board member, some staff and advocates that riders who are low-income may have been more likely to use the discontinued fares. This was supported by TTC information included in a 2020 consultant report which noted that riders who were more likely to use discontinued fares and other single fare options included "riders [with] limited available funds." Many of the complainants who contacted us about the refund decision said that they were financially impacted by the refund decision.
100. The City's poverty reduction research notes that often low-income people rely more on public transportation and are also more likely to spend a larger amount of their income on transportation costs.<sup>5</sup> In 2013, the Medical Officer of Health submitted a report to

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<sup>4</sup> Equity-deserving groups refer to "communities that face significant collective challenges in participating in society because of barriers to equal access, opportunities and resources due to disadvantage and discrimination, and, therefore, deserve social justice and reparation." Source: City of Toronto Equity Lens Tool

<sup>5</sup> Aug. 8, 2019, [Transit Fare Equity Program: Phase 1 Evaluation Report](#), pg. 5



the City's Board of Health that stated: "The availability of transit also has an impact on low income residents' ability to access important goods and services such as food, health care, employment, and recreation, all of which impact their health."<sup>6</sup>

101. One transportation researcher shared: "There needs to be some kind of baseline understanding of what kind of equity analysis you need to conduct, when you're proposing a change to the ... fare system."
102. The TTC has an equity impact analysis template, for use by its diversity department, that states the TTC: "Applies an equity and anti-racism lens to assess potential impacts of the identified policy, program, service or initiative on diverse communities, with particular attention to Black, Indigenous, racialized and other equity-deserving groups."
103. This template requires staff to outline the decision being considered, who has authority to make the decision, what equity framework has been used to guide staff's analysis, data analysis and sources, engagement considerations, and includes a summarized impact and findings section.
104. Based on the information available to us, the TTC did not conduct an equity impact analysis to inform its refund decision.
105. Although staff reports to the board often include a section on "equity and accessibility matters," the report section does not constitute an equity impact analysis. One staff stated candidly: "How do we support the actual equity and accessibility and mobility of the City, rather than 'let's just have a section in the reports that reflects on the fact that we have a section'." Staff explained that sometimes the equity matters section of a report was only completed when a report was in its final stages.
106. We asked some board members and staff if any equity considerations were taken into account before the refund decision was made. Some board members and staff told us that they did take into account equity considerations. However, one staff said that the TTC has: "a culture of dismissing those who are living at the margins." Other staff who were involved in preparing briefings to the executive team about the potential refund decision speculated that low-income riders would not have been impacted as they could not afford to have purchased fares in large quantities. One staff summarized:

We didn't think that, say, low income or equity-deserving customers would likely have been accumulating vast quantities of legacy tickets or tokens just because

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<sup>6</sup> Mar. 11, 2013, [Next Stop Health: Transit Access and Health Inequities in Toronto](#), pg. 1



they cost a lot of money. So, we did consider that, and we did not feel that it would be a huge impact.

107. One board member described having discussions about the potential equity impact of the refund decision “at great and painful length.” However, our investigation found no records documenting these discussions.
108. Many board members and staff expressed concerns that the TTC could not afford to pay approximately \$24 million in refunds. These same witnesses did not mention this \$24 million in fares from the riders’ perspective.
109. Advocates said that because the TTC did not properly consider the impact of the refund decision on equity-deserving groups, it “erodes confidence and trust” in the TTC.

## **Whether data informed the refund decision**

110. In July 2023, staff shared data with the executive team, estimating the number of discontinued fares still in circulation at 7.4 million tokens and 1.2 million tickets. As of July 2024, the TTC said that outstanding tokens had dropped to 6.7 million and tickets to 573,000.
111. At an October 2024 board meeting, an executive told the board that the dollar value of unused tokens and tickets at the time was approximately \$24 million. Staff told us about the challenges of gathering data to identify riders who used the discontinued fares. They said that due to the TTC’s centralized fare collection processes, they were unable to identify if there were specific areas across the city where there was higher usage of discontinued fares. Staff explained that their focus was on understanding how many fares were still in circulation, the rate at which they were being used and communicating to riders to use their tokens and tickets before they were discontinued. One board member told us: “We never really got an analysis [to inform the decision], we always just kind of knew that this would be very difficult to do.”
112. The fare policy goal about collaboration and transparency states that: “Data will be publicly owned and used for planning, monitoring and reporting.” A transportation researcher said that it is important to have data to inform decision-making. One staff said that data was “not the driving force” in making the refund decision.



## Whether consultation informed the decision

113. Based on the information available to us, the TTC did not consult the public on the decision not to give refunds or exchanges for discontinued fares. While the TTC provided us with consultation reports and documents which were conducted as part of the TTC's 5-year fare policy work, there was no reference in these documents to any consultation relating to refunds for discontinued fares.
114. The fare policy goal of collaboration and transparency states that: "The process of establishing fares will be conducted publicly to ensure agency accountability and enhance public trust."
115. The TTC by-law governing board proceedings allows members of the public to make deputations to the board on issues that affect them. As previously noted, there were no items before the board that specifically mentioned refunds or exchanges for discontinued fares before the TTC announced its decision.
116. The advocates we spoke with said that the TTC had not consulted with them about the refund decision.
117. The TTC has a consultation template that states it should be used to gather input from impacted stakeholders to support decision-making. Engagement approaches described in the template include surveys, town halls, focus groups and roundtable interviews. The records we reviewed did not include documentation that the TTC used the consultation template to specifically inform the refund decision.
118. One staff member said: "We should have had public consultations on this topic. I don't think it should be a room full of just TTC folks talking about it. We should have heard from residents. We should have heard from community organizations."
119. Several staff shared with us their understanding of the experiences and circumstances of riders who were affected, including why some held large quantities of the discontinued fares.
120. One staff said, "If they ... don't have access to funds, they're less likely to be hoarding tickets and tokens for a long time, because they wouldn't be able to have the cash outlay for that."



121. One member of management also questioned the likelihood of certain riders holding large quantities of fares:

Why somebody who's living on ... a disability pension ... would have a stockpile of 300 tickets or tokens doesn't really compute for me ... [I] don't really understand that ... There was certainly more than enough time to either sell them if they wanted to do that or to use them up.

122. Another executive questioned a person's motives for doing so:

Some people would buy [tokens] to hedge against fare increases ... some people essentially speculated in tokens. There's undoubtedly people out there who thought they'd be really clever ... 'I'm gonna hedge against it, they're going to be worth a fortune someday' ... There might be some people that did that, but that's speculation and sorry when you speculate sometimes you lose.

123. Another member of management placed responsibility on the riders for holding unused fares and framed it as an issue of the riders' own choices:

I can't help you when you're not managing your own resources ... that's not the TTC's fault ... that you didn't use up what you bought ... It's like you bought 500 cans of soup, and then you let it sit on your shelves, and it expired and now you want a refund for it. Well, it's kind of, like, not our accountability or responsibility ... My position ... is that ... you need to own your decisions ...that is my personal opinion.

## **Process for the refund decision: analysis**

124. The TTC could not point to a process that it followed when it decided not to provide refunds or exchanges for discontinued fares.
125. The TTC has staff who specialize in diversity, as well as an equity impact analysis tool and a consultation template designed to inform decision-making. However, the TTC failed to use this expertise and tools when considering the impact of the refund decision on equity-deserving groups, especially low-income riders. Even though staff reports often have an "equity and accessibility matters" section, it was concerning to hear that some staff believe these are often more of an afterthought. In this case, based on the information my office reviewed, the TTC did not even conduct a cursory equity review. We saw no evidence that equity considerations informed the decision.



126. The TTC did not collect or analyze data that could have informed the refund decision. Its approach was inconsistent with its fare policy goals regarding equity, affordability, data-informed decision-making and transparency.
127. While some staff said they had internal discussions about the equity impact of the refund decision, those discussions were undocumented. Responses from some witnesses appeared to show little empathy towards riders who sought refunds. There also appeared to be a lack of understanding regarding who these riders were, why they had accumulated large quantities of tokens and tickets, and what their motivations were for doing so.
128. While a few staff acknowledged the challenging situations some riders face, others placed the responsibility on the riders for choosing to accumulate so many fares. It is concerning that some staff were critical of people who were trying to save money. Very few acknowledged the challenging situations some riders face.
129. Part of procedural fairness is allowing people to ask questions when decisions are being made that impact them. While the TTC ultimately can decide not to issue refunds, the refund decision was made without a clear public process that would have informed riders and permitted public discussion before the TTC made that decision and implemented it.



# Fare decisions



## Fare decisions

### How decisions about fare changes are made

130. As we could not find who and how the refund decision was made or what process they used to arrive at the refund decision, we wanted to better understand the processes that staff and the board have used before when making decisions on “fare changes.”
131. What is a “fare change?” While not a defined term by the TTC, board decisions and briefing notes mention “fare changes” or “fare policy changes” which include references to refunds and exchanges for entire fare types. Previously, the TTC offered refunds when there were changes to entire fare types, such as discontinued tickets and an exchange system for older formats of tokens. Other categories of “fare changes” we found included increasing fare prices, adding or discontinuing fare types and changing the conditions for use of fares.
132. One member of management told us: “It's my understanding that any change in fare is the responsibility of the board, right? ... I guess ... with respect to the board requiring a decision on whether to provide the refund, I'm not a hundred percent certain if their approval was required.”
133. We looked for a documented process that could guide staff and the board on how to consistently and fairly make fare changes, hoping it could inform the process on how a decision around refunds of this scale should be decided. The TTC could not direct us to a documented process outlining how fare changes, including decision about refunds, are made. As we saw, while the act and by-law No. 1 set out that fees and fares are set by the board, there is no further detail on which other type of fare change decisions are made by the board. While witnesses were clear that fare increases would go to the board, we heard conflicting information about the process for approving other fare changes. One staff described this process as a “grey zone.”
134. One board member told us that it is just assumed that the board and staff know which fare change decisions staff should send to the board for approval. Some board members and staff explained that the board is responsible for making fare change decisions that have a “major impact.” No one we spoke with could define the threshold for a “major impact” that would require board approval.
135. We looked to see whether the TTC’s 5-year fare policy informed fare change decisions. In 2020, staff updated the board about this 5-year fare policy project that included an objective to develop a fare policy document outlining “the preferred fare structure, fare



media offerings and fare pricing.” An executive told us that the intention of this work was to create a “standards or framework” for planning fares. As outlined earlier, in May 2021, the board endorsed seven “fare policy goals” to inform the direction of the final 5-year fare policy document. In February 2022, the board directed staff to undertake further due diligence and consideration of the financial impact of this fare policy work. The TTC told us that: “There has not been a follow-up report to the TTC board on the 5-year fare policy since February 2022 due to organizational priorities.”

136. The TTC failed to produce the fare policy document. Although some employees believed it existed, other staff confirmed it did not.
137. We heard staff use the term “fare policy” in different ways and shared different interpretations of whether the 5-year fare policy had been completed. One staff told us that the TTC fare policy more generally describes the TTC fare table, concessions and fare types that are publicly available on the TTC’s website. An executive explained to us that at the TTC the term “fare policy” is “anything to do with a fare and how the fare operates in relation to someone travelling ... I think it's used very broadly, not specifically as a corporate policy.” One staff told us:

I don't have an actual [fare] policy ... [but] I know for a fact that every time we want to change something [we're told] no, you can't do that, that's a fare policy change and you need to go to the board. I don't know what that actually means ... [but] there has to be a policy for things to be a policy change.
138. Despite this, a board-approved 5-year fare policy as well as a fare policy are cited in several publicly available TTC documents, including in the Wheel-Trans Fare Payment Policy, a TTC webpage which notes that the work has been completed, and the TTC Corporate Plan 2024-2028.
139. One of the fare policy goals states that the process for “establishing fares” must be conducted publicly “to ensure agency accountability and enhance public trust. Rationale for policy should be clear to customers.” One executive said that the board often approves strategies and policies, such as fare policy goals, however it can be unclear to staff how to “use those practically ... what often trumps the use of the tool is the financial crunch, political pressure, all those things that ... public sector entities often deal with.”
140. Several executives said that they would welcome a recommendation that the TTC and board more clearly outline the criteria for which fare change decisions can be made by staff and which require board approval.



## How decisions about fare changes are made: analysis

141. The TTC lacks documented processes or criteria for making most fare change decisions. It is unclear how the fare policy goals apply when the TTC makes fare changes. While many people we interviewed agreed that fare changes with a major impact should go to the board, staff could not clarify the criteria used to determine when a proposal met that threshold. Despite previous practice of classifying system-wide refund decisions as fare changes, and routing fare changes with major impact to the board, the refund decision at the centre of this investigation did not go to the board. As a result, the TTC reached the refund decision through a process that cannot be clearly explained or justified based on any established process or criteria. This demonstrates the need for greater transparency and accountability in TTC decision-making.
142. Part of procedural fairness is having clear processes to ensure that decisions are made consistently, transparently and within defined authority.
143. The process needs to be clear and public, so that it is practical to apply and cannot be, as one executive told us, trumped by the “financial crunch, political pressure, all those things that ... public sector entities often deal with.” A defined and public process for fare changes would require financial and political pressures to be stated openly as factors in fare change decision-making.
144. Without a clear method of publicly tracking board report requests and directives, required staff follow-up may be overlooked. The TTC reported the 5-year fare policy as completed although it had not been approved and no one could find a 5-year fare policy document. Implementing a process that allows the board and the public to track and receive updates on work assigned to TTC management would improve accountability and reduce the likelihood of outstanding matters being overlooked.
145. We saw that staff used the term “fare policy” in multiple ways which are not clear or defined, either internally or for riders. Even more puzzling is the TTC’s assertion on its website that the 5-year fare policy was approved and does in fact exist. It does not. If a policy does not exist, it should not be presented to the public as such. This raises serious concerns that the TTC is providing misleading information to the public about a policy which does not exist. This means that the TTC is failing to provide information on its processes and how they may impact riders.



146. Staff turnover and the resulting loss of institutional knowledge heighten the need for the TTC to have clear, documented processes for fare changes. Without such processes, fare change decisions may be made inconsistently, undermining procedural fairness.

## Broader concerns about process

147. As we spoke with staff and board members, they shared broader concerns about a lack of clarity around seeking board approval, as well as concerns about the lack of robust, clear processes for decision-making in general.
148. Staff shared that they will sometimes include excess information in staff reports to the board. Some board members also said that staff prepare lengthy, sometimes highly technical reports which are difficult to navigate. Some board members said they can struggle to identify key information and understand exactly what they are being asked to approve. One member of management said they include this level of detail to avoid being criticized for omitting relevant information or for failing to bring it to the board's attention. One board member described an example of the volume and content of reports: "[Staff] gave us like a 600-page report, and they are very technical. Who has time to read and go through all that?"
149. The inclusion of extraneous details in staff reports was described by both a board member and a member of management as a practice to "CYA," meaning "cover your ass."
150. A board member and an executive felt that key decision points in staff reports should be isolated as actionable items to ensure the board reaches a decision and that staff have the authority to proceed. One board member told us: "Rather than [staff] coming up with the recommendations, what are the decisions [staff] want us to make, like what do you actually want us to decide, rather than giving us a laundry list of recommendations."
151. For example, the summary section of a Sept. 24, 2024, staff report to the board omitted the anticipated Dec. 31, 2024, end-date for accepting tokens and tickets. This information appeared only in the body of the 15-page report, on page eight. The report requested that the board receive the report for information, without highlighting the end-date as a key issue or requesting specific board approval.
152. Several board members and executives told us that they would welcome changes to how staff reports are drawn up so that key board decision points are clear and actionable.



153. Some board members and staff spoke more broadly about the confusion they had over the roles of the TTC and the board. One executive told us that while our investigation was focused on the process leading to the refund decision, similar confusion existed at the TTC regarding which matters require board approval. They told us that they “could swap this [refund] issue out and give you ten others and you'd be asking me the exact same questions today.”
154. The same executive hoped our report would recommend “more robust decision-making processes and, accountabilities and documentation.” They also hoped having these robust policies and processes in place would help with push-back and counter a lot of the “off-book governance” by text and in hallways that currently occurs.
155. Another executive explained to us that there is: “Governance – which is what is supposed to happen – and then there is practice, which is what actually happens.” One board member said that, at the TTC, “corporate governance is weak.”

## **Broader concerns about process: analysis**

156. We heard overwhelmingly from both staff and board members that there is uncertainty and insufficient guidance regarding reporting to the board. Staff and board members called for greater clarity so that both parties understood what information staff should provide to allow the board to make informed decisions. Executives felt the TTC and the board would benefit from more robust processes and policies to ensure transparency.
157. It is not reasonable to expect board members to consider decisions if there is an overwhelming amount of information or if it is not clear what they are being asked to decide. Board members need key information and decision points outlined in staff reports, so it is clear what they are deciding. The September 2024 staff report to the board contained the first public mention of the original deadline for the discontinued fares, but this significant detail was buried in the body of the report and omitted from the summary.
158. As we saw, the TTC does not have avenues for members of the public to keep track of board requests to staff and staff updates to the board. This lack of transparency regarding progress of board directives and staff updates raises concerns about administrative fairness.



# Communication to the public

“The one representative ... told me that we have [a] policy, that we have the right to discontinue [tokens] at any time. And when I asked ... where is ... that policy? [They] said go and look at yourself on the website ... I went to [the] website, I tried my best, I didn't see it anywhere.”

— Rider with a disability and father to two children who had approximately \$800 in discontinued fares saved

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“I would just say it's the ‘notional fare policy’ is what we would be referring back to.”

— TTC staff member



## Communication to the public

159. Complainants expressed concern that they had not received enough notice that their tokens and tickets would expire without compensation. Some expressed frustration over the TTC's responses to their requests for refunds due to what they believed were exceptional circumstances.
160. This section examines whether the TTC's communication to the public about its decision not to provide refunds or exchanges for discontinued fares was sufficient.

## Communication to the public about the refund decision

161. In November 2019, the TTC ended ticket and token sales at its stations. Based on the available information, around that same time, the TTC issued communications, two media releases and a Facebook post, which stated that the TTC would not provide refunds for unused fares. The press releases were long; the information about refunds was included near the end. No one that we asked was able to explain whether the refund decision had already been made when the TTC released those communications in 2019. When the TTC issued a media release in March 2023 to announce that third-party retailers would no longer be selling tokens, the release made no reference to refunds. The TTC had nothing further to say about the lack of refunds for discontinued fares until October 2024.
162. We heard from complainants, advocates and some executives that they understood that tokens did not expire. This was also the Ontario Human Rights Commission's understanding in its 2021 letter to the TTC and Metrolinx where it outlined concerns about barriers linked to using PRESTO on the TTC.<sup>7</sup> One advocate told us: "There was never a communication made by the TTC until very recently that ... these things will be expiring." Advocates and complainants compared discontinued fares to gift cards, most of which do not expire. Some complainants told us that they purchased large amounts of discontinued fares based on this belief that they would not expire.
163. We know that the TTC previously issued refunds and exchanges for discontinued fares. In 2006, when the TTC discontinued an older version of tokens due to widespread counterfeit tokens in circulation, riders could exchange their old tokens for

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<sup>7</sup> Apr. 6, 2021, [Ontario Human Rights Commission letter to the TTC and Metrolinx](#). The TTC told us that the OHRC's concerns have since been addressed.



new ones. In 2008, the TTC allowed holders of discontinued adult tickets to exchange them for tokens.

164. Staff provided several updates to the executive team which noted that the TTC should provide riders with sufficient notice, if a decision was made not to provide refunds for the discontinued fares.
165. A July 2024 staff report to the board about discontinuing fares also said that: “Once a date is established, it will be widely communicated to customers well in advance to ensure customers are aware.” The staff report did not address refunds or exchanges of discontinued fares. It assured the board that notice would be properly communicated “well in advance” of the end-acceptance deadline.
166. A staff report to the board on Sept. 24, 2024, stated that the TTC would stop accepting tokens and tickets after Dec. 31, 2024. Refunds were not mentioned in the September 2024 report either.
167. On Oct. 24, 2024, when the TTC announced publicly that there would be no refunds or exchanges for the discontinued fares, it launched a communications campaign, which was updated in December 2024 to reflect the new deadline. These communications included news releases, digital advertising, social media posts, posters and announcements at stations. In some of these communications, such as posters and social media posts, the TTC stated that no refunds would be provided. However, in its English web ads, as well as web and print ads translated into several languages including French, traditional Chinese, Arabic, Spanish and Urdu, the TTC did not state that there would be no refunds or exchanges for discontinued fares. As there was no data to inform whether any communities were more likely to use discontinued fares, staff confirmed that these ads did not target any specific communities.
168. Prior to the board extending the deadline to use discontinued fares, the TTC gave riders just over two months to use their remaining tokens and tickets.
169. One board member shared with us that they believed that staff did not communicate enough to riders.

## **Communication to the public about the refund decision: analysis**

170. Clear and timely communication is a key element of administrative fairness; this includes giving riders reasonable notice of a decision that may impact them.



171. Although the TTC first communicated to the public about no refunds for discontinued fares in 2019, there were only a handful of public communications about refunds, some of which were buried in a long news release. It was unclear whether a decision regarding refunds had even been made in 2019, as many people at the TTC we spoke with believed that a decision was not made until later. The communications were inconsistent. We found no evidence that the TTC had communicated to the public that discontinued fares would not be refundable or exchangeable in the five years between the 2019 communications and the Oct. 24, 2024, announcement.
172. That announcement told riders they had until Dec. 31, 2024, to use their tickets and tokens and that the TTC would not offer refunds or exchanges. Prior to the board extending the deadline in early December 2024, this initial announcement left riders with barely two months to “use it or lose it” before the discontinued fares lost all value.
173. The TTC started a reasonably comprehensive effort in late October 2024 to notify riders that tokens and tickets were being discontinued, but did not consistently communicate to the public that it would not offer refunds or exchanges for any discontinued fares. Despite translating ads about the discontinuation of these fares – presumably to reach a wider, potentially marginalized (non-English speaking, likely racialized) population – the TTC failed to include the critical message that riders could not get refunds or exchanges. This is unfair.
174. There was a general perception amongst members of the public, and even some staff, that tokens did not expire. The Ontario Human Rights Commission took this as fact. The TTC knew, or should have known, that a public communication campaign about the discontinuation of tokens with no refunds would have to counteract the prevailing assumption that this fare type did not expire.
175. The TTC’s past practice of providing refunds or exchanges for discontinued or new fare formats could reasonably have led the public to expect similar accommodations for discontinued fares. Clear and timely communication may have helped manage those expectations and reduce confusion.

## Handling refund requests

176. The TTC told us that there were 110 refund requests for discontinued fares to its customer service department between October 2024 and August 2025.
177. Some riders told us that they contacted the TTC to request a refund due to exceptional circumstances. Some complainants that we heard from said that they could not afford to lose the value of the tokens and tickets they had purchased, and requested refunds



from the TTC due to the exceptional circumstances they were experiencing. We looked to see whether the TTC applied its policies relating to fares when responding to riders' requests for refunds.

178. The TTC shared a copy of its standard response to riders requesting a refund. The standard response states that refunds or exchanges for the discontinued fares could not be provided "as per the TTC's fare policy." None of the responses we reviewed provided detailed reasons for denying refund requests.
179. Additionally, as we saw, despite a TTC fare policy or 5-year fare policy being cited in several publicly available TTC documents, the TTC was unable to provide us with a copy of a TTC fare policy document. One webpage references the 5-year fare policy and appears to provide a hyperlink, but the hyperlink is inactive.
180. One complainant told us they requested a copy of the "fare policy" that the TTC cited when denying their refund request. Staff told them to look at the TTC's website. The complainant told us they could not find a copy of the fare policy on the website.
181. The complainant explained that they did not escalate their concern further, as they believed they did not have sufficient grounds under the TTC fare policy. They told us:

The one representative ... told me that we have it on our, on our policy, that we have the right to discontinue them at any time. And when I asked [them], can you please show me where, where is it [sic] that policy? [They] said go and look at yourself on the website. I said, I would appreciate if you give it to me because that's why I'm here ... [They said] no, you, you can go and do it for yourself. I went to website, I tried my best, I didn't see it anywhere.
182. We asked staff to share the "fare policy" they relied on to deny refund requests. One staff who referred to this in their response to riders told us they were referring to a "notional fare policy." This is because the "fare policy" does not exist.

## **TTC refund policy**

183. We reviewed the TTC's refund policy to see whether it informed staff responses to riders seeking refunds.
184. The TTC gave us two versions of its refund policy. The two versions are inconsistent as to which staff are authorized to grant exceptions to the policy, and some of the positions referenced in the documents shared with us no longer exist.



185. Staff we spoke with placed different weight on the refund policy's authority. Staff provided updates to the board in 2019 and to the executive team in 2022, noting that if a decision was made not to provide refunds for discontinued fares, exceptions could still be granted under the refund policy for riders experiencing exceptional circumstances.
186. Some staff responsible for responding to rider refund requests said that they rely upon the refund policy in their work. One staff said that the TTC reviewed all refund requests in line with exceptions outlined in the refund policy and that unique situations were considered on a case-by-case basis. However, another staff member involved in responding to refund requests was unfamiliar with the refund policy and had assumed by-law No. 1 provided guidance on refunds.
187. Before launching this investigation, staff said in our preliminary discussions that they were working to determine what criteria would warrant a refund for riders experiencing exceptional circumstances. Staff we subsequently interviewed said that the TTC had not developed criteria to assess whether to provide exceptions in unique circumstances.
188. The TTC told us that it denied all rider requests for refunds of unused tokens and tickets. One member of TTC management told us that no riders who requested refunds for discontinued fares presented "any circumstances that required a refund to be recommended."
189. Management told us that the TTC regularly issues "goodwill gestures" to riders for single fares. They said these goodwill gestures most commonly arise when a rider complains about having used their fare, but they encountered a subway delay or service interruption and had to use alternate travel to reach their destination. This may result in the TTC giving the rider a PRESTO ticket or credit equal to the value of their fare. They said this happens about 10 to 20 times a week, depending on service interruptions. They said that how these are issued: "Depends on the scenario ... there's no rule book, there's a lot of gray area."
190. Generally, they will verify that the rider used a fare at that time by checking their PRESTO card or payment ID number. However, they have given credits to riders who said they used untraceable cash fares. They also said the TTC has, very rarely, reimbursed larger amounts such as ride-share fees by giving those riders PRESTO tickets or credits.
191. A staff member told us that they believe that, moving forward, the TTC will continue to need a refund policy as: "A guideline for how to treat scenarios and for us to stay consistent with how we, you know, deal with these types of situations and requests."



## TTC policy development process

192. There are several references on City and TTC website and board orientation documents stating that the board approves TTC corporate policies.
193. We asked board members and staff to explain the process used to develop policies. One executive said that they: “Don’t think [they, the executive staff member themselves] fully know.” Several board members and executives said that it was not clear which policies required board approval and which ones could be approved by staff.
194. Some staff said that many policies need updating. One member of TTC management said that since some TTC policies are not dated, it is not possible to know which policies are current. They said: “I can tell you right now there are policies that are not correct there.”
195. We asked staff whether there is a document that outlines the policy approval process. We were told that there is none. One member of TTC management told us that the TTC is in the early stages of developing a policy approval process. While we reviewed information that mentioned that TTC executives were responsible for policy approval, there was no process outlined for doing so. Another staff told us that they had looked for a policy development process but were unable to find it. One member of management said: “We don't have a really great policy framework or policy approval framework at the TTC. Even policy management is a gap.”
196. One member of management told us that the TTC do a “really terrible job of managing policies.” Several staff said that they would welcome a recommendation relating to improving policy processes.

## Handling refund requests: analysis

197. Staff provided updates to the board in 2019 and to the executive team in 2022 noting that, if a decision was made not to provide refunds for discontinued fares, exceptions could still be granted under the refund policy for riders experiencing exceptional circumstances. From the responses we reviewed, it was unclear whether the TTC adequately considered the exceptional circumstances of some riders. Also, in the responses we reviewed, staff did not provide detailed reasons, nor did they address riders’ unique circumstances.



198. The TTC appears not to have exercised the discretion available under its refund policy when considering refund requests from riders experiencing hardship, raising concerns about equitable treatment.
199. Some staff given discretion under the refund policy, in one or the other version of that policy, were not aware of its contents. Even more concerning is that a staff member responsible for making decisions on individual refund requests was completely unfamiliar with the refund policy. Additionally, TTC staff do not appear to rely on the refund policy or any other guidance when issuing “goodwill gestures” to riders; without a process to guide them, these decisions appear to be made arbitrarily.
200. The TTC’s refusal to refund or credit any discontinued fares is an unsettling contrast with its frequent goodwill gestures to other riders. Despite telling my staff that it would, the TTC failed to develop criteria to guide discretionary exceptions for riders requesting refunds for discontinued fares who were facing exceptional circumstances.
201. The TTC provided incorrect information about a 5-year fare policy and/or a fare policy document. It mentioned on its website that the 5-year fare policy was approved and referenced a fare policy in its decisions to deny refund requests, despite neither actually existing. After being denied a refund, one complainant was told to look for the fare policy on the TTC’s website. This was misleading.
202. The fact that staff were not clear about which TTC policies relating to fares exist, which are current and how they are applicable to riders is concerning and raises procedural fairness issues. As the TTC has not made the refund policy available to the public, riders are also unclear about which policies apply to them. This is misleading and raises serious concerns about the accuracy of the information that the TTC is providing to riders.
203. No one that we interviewed could clearly explain any process to change or approve policies. We were also not able to clarify which policies require board approval and which can be approved by staff. This absence of process means inconsistent policy development and updates, potentially without approval by the appropriate decision-making body.



# Conclusion

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Riders should be assured that the TTC follows fair and transparent processes and considers rider needs before making decisions.

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## Conclusion

204. The TTC plays an essential role in delivering a transit system across the City and is one of the largest transit systems in North America. The system enables riders to travel for work, leisure and to access essential services. For many riders, the TTC is their only available mode of transportation. A system of this size needs to have clear structures for critical decisions that could have a significant impact on its riders. The impact of TTC fare decisions can be especially significant for riders who are members of equity-deserving groups.
205. What began as a simple request for information about the process used to arrive at the refund decision resulted in more questions than answers at the end of the day. Each attempt to understand how the TTC reached the refund decision led to a widening path of confusion and dead ends.
206. This confusion was evident when no one could find a documented decision or any of the steps that led to it. Neither staff nor the board were clear about the threshold or specific criteria for most matters which should be considered by the board or how certain types of fare changes should be made. No one could direct us to a documented fare change process. The absence of documented decision-making, clearly defined roles, and an established fare change process reveals an approach that lacks sufficient transparency and accountability.
207. Riders should be assured that the TTC follows fair and transparent processes and considers rider needs before making decisions.
208. The TTC estimated that \$24 million in discontinued fares were still in circulation when it made the refund decision. Some staff showed a lack of empathy toward riders who had significant quantities of discontinued fares. There was no evidence that the TTC took steps including gathering data or consulting with the public to understand, assess or mitigate the impact of the refund decision. It did not use its own equity impact analysis tool to assess the impact of the refund decision or its consultation template to engage the public.
209. We were surprised that no one we interviewed could explain why the TTC did not give adequate consideration to, or exercise discretion in, cases involving compelling and exceptional rider circumstances.
210. The broader systemic weaknesses in the TTC's processes also had downstream effects on riders. For example, the TTC provided inconsistent information to the public



about the refund decision and, at times, cited policies that were not developed or that did not exist. These issues raised concerns about the TTC's processes for developing, approving, and managing policies.

211. Clear and consistent operational processes are necessary to support transparent, fair and accountable decision-making. Without processes to guide operational decision-making for this type of fare change, it becomes difficult to assess whether the TTC made and applied the refund decision consistently and fairly. Organizations like the TTC risk losing public confidence in the fairness of its decisions without structured guidance and transparency.
212. My team and I at Ombudsman Toronto appreciate the candid nature of the discussions we had with many staff and board members. Our investigation showed that while staff and board members had positive intentions in making fare decisions, they did not have the necessary infrastructure in place to ensure that the decision-making process was fair, transparent or that the impact of the decision was adequately considered.
213. What was encouraging was that some witnesses wanted to see real change and saw the value in making improvements to the existing processes and policies. Many staff and board members we interviewed said that guidance and recommendations on these broader issues would be welcome.



# Recommendations



## Recommendations

In consideration of the information gathered through this investigation and our findings, I make the following eight recommendations to the TTC board and TTC staff. The TTC board and staff accepted all eight of my recommendations.

**Recommendation 1:** Staff should develop a board-approved process that clearly delineates how fare decisions are made. This process should:

- Define the types of fare decisions that the process would apply to
- Outline criteria for which fare decisions require board approval and which decisions are delegated to staff
- Establish criteria for data collection and public consultation to ensure fare decisions are evidence-based and to support fair decision-making
- Ensure fare decisions are recorded, tied to relevant policies and processes and that the TTC makes its rationale for the fare decision public

**Recommendation 2:** Ensure that the TTC uses its equity impact analysis tool, or a comparable analysis, when making fare decisions. The use of this equity tool should be incorporated into the fare decision process delineated in Recommendation 1.

**Recommendation 3:** The TTC should make publicly available a document that tracks the status of board directives and requests to staff.

**Recommendation 4:** The TTC should develop guidance for staff reports to the board to ensure reports include key information up front to assist the board and members of the public in understanding the report's contents. This key information should include any approvals, recommendations or actions staff are seeking from the board.

**Recommendation 5:** The TTC should review its current policy documents that apply to fares, including the fare policy goals and the refund policy, to determine which existing policies are relevant and update them accordingly.

**Recommendation 6:** The TTC should develop a public-facing rider fare policy document to ensure relevant fare information is clear to riders. It should clearly explain the TTC's refund process, including the exercise of staff discretion in assessing individual refund decisions, and ensure that this information is communicated in its responses to riders.



**Recommendation 7:** The TTC should develop a process for creating, approving and updating policy documents. This process should include which roles are responsible for approvals and updates.

**Recommendation 8:** TTC staff should provide a status update on the implementation of these recommendations and report back on its progress to Ombudsman Toronto on a quarterly basis, until the Ombudsman is satisfied that the TTC has taken adequate steps to address them. Once the recommendations have been fully addressed, the TTC staff should submit a final report to the TTC board and to City Council.



# TTC response to our report

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“The TTC welcomes the report’s recommendations as an opportunity to continue strengthening governance practices, documentation standards, transparency measures and public accountability processes across the organization.”

– TTC Chair Jamaal Myers

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**Toronto Transit Commission**  
1900 Yonge Street, Toronto, ON M4S 1Z2  
416-393-4000

June 3, 2026

Kwame Addo  
Ombudsman Toronto  
375 University Ave, Suite 203  
Toronto, ON M5G 2J5

Mr. Addo,

The Toronto Transit Commission (TTC) appreciates the work of Ombudsman Toronto and the opportunity to respond to the report, “No refunds for discontinued TTC tickets and tokens: An investigation behind how the decision was made concerning discontinued fare media and refund practices related to legacy tickets and tokens”.

The TTC is one of the largest public transit systems in North America and provides essential service to the residents of Toronto every day through its subway, streetcar, bus, and paratransit networks. The TTC plays a critical role in supporting mobility, economic activity, accessibility, and social connection across the city, including providing access to employment, education, healthcare, housing, and community services for millions of customers each week. As a public service organization, the TTC recognizes the importance of maintaining public trust, transparency, accountability, and equity in its decision-making and operations.

The TTC acknowledges the report’s findings regarding governance clarity, documentation practices, communications, and decision-making processes. It is recognized that greater clarity regarding the respective roles of the TTC Board and TTC staff, more consistent documentation of discussions and decisions, and clearer public communications would have strengthened transparency and improved the overall customer experience.

The TTC also appreciates the report’s recognition of the broader governance challenges that can arise in distinguishing between the responsibilities of the TTC Board and TTC staff. The inclusion of these observations is welcomed, as it helps reinforce the importance of clear governance structures, accountability, and decision-making processes within the TTC.

It is important to distinguish between fare policy decisions and operational considerations relating to the administration of legacy fare refunds or exchanges. The TTC recognizes that fare policy decisions fall within the authority of the TTC Board, and there is alignment among current TTC executives, management, and staff that future fare policy changes and significant fare-related decisions are to be formally brought forward to the TTC Board for consideration and direction.

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Jamaal Myers, Chair  
Joe Mihevc, Vice-Chair  
Mandeep S. Lali, Chief Executive Officer

Paul Ainslie, Commissioner  
Alejandra Bravo, Commissioner  
Fenton Jagdeo, Commissioner  
Liane Kim, Commissioner

Ausma Malik, Commissioner  
Josh Matlow, Commissioner  
Julie Osborne, Commissioner  
Dianne Saxe, Commissioner



The TTC further notes that the matters examined in this investigation occurred during a period of significant organizational transition, operational change, and leadership. Since that time, work has been undertaken to strengthen internal governance, improve oversight practices, and support greater consistency in organizational decision-making and documentation processes.

Throughout the transition away from legacy fare media, efforts were made to mitigate customer impacts, including extending timelines for the acceptance of legacy fare media and examining potential operational approaches relating to exchanges and accommodations.

Equity considerations were an important component of discussions relating to legacy fare media. Consideration was given to the potential impacts on customers experiencing financial hardship, accessibility barriers, changing travel patterns, and reduced transit use following the pandemic. The length and complexity of discussions reflected ongoing efforts to assess customer impacts, operational feasibility, fairness considerations, and implementation challenges prior to proceeding with communications and operational changes.

The TTC remains committed to continuous improvement and views this report as an opportunity to further strengthen and clarify governance practices, increase transparency, and accountability, and enhance customer-focused decision-making across the organization.

## **Progress and Ongoing Improvements**

### **Governance and Decision-Making**

Since the period reviewed in the investigation, a number of improvements have been implemented to strengthen governance and internal decision-making practices.

Internal processes are currently supported through more robust oversight, clearer accountability structures, improved cross-divisional coordination, and more actively managed documentation and records management practices. Additional emphasis has also been placed on ensuring that significant operational and policy matters are appropriately tracked, escalated, and documented.

The TTC has also benefited from greater continuity and stability within leadership and management roles following periods of turnover during the timeframe examined in the investigation. This has supported more consistent organizational oversight and strengthened internal review processes.

Current TTC leadership, management, and staff are aligned that fare policy matters and significant fare-related decisions are to be brought forward to the TTC Board for consideration and direction.



### **Transparency and Public Access to Information**

Additional measures have also been implemented to improve transparency and public access to TTC Board information and decision-making processes.

TTC Board reports, meeting agendas, minutes, and decisions are now publicly accessible through the City of Toronto website and the Toronto Meeting Management Information System (TMMIS). These changes have improved public visibility into matters considered by the TTC Board and support clearer public tracking of Board discussions and decisions.

The TTC continues to support practices intended to strengthen transparency, accountability, and public confidence in organizational decision-making.

### **Equity, Accessibility, and Customer-Focused Work**

The TTC recognizes the importance of balancing operational, financial, logistical, and equity considerations when implementing system-wide operational changes. Equity, accessibility, and inclusion continue to be foundational priorities across the organization and are reflected throughout the TTC's Corporate Plan and strategic objectives.

The TTC Corporate Plan includes commitments focused on improving accessibility, fairness, inclusion, customer trust, and service reliability, while strengthening engagement with diverse and equity-deserving communities across Toronto.

Ongoing work in these areas includes:

- Incorporating equity considerations into operational reviews, policy development, service planning, and customer communications
- Advancing accessibility, anti-racism, equity, diversity, and inclusion initiatives across the organization
- Strengthening engagement practices including with underserved and equity-deserving communities
- Improving accessibility considerations within customer service and operational decision-making
- Continuing organizational training and awareness initiatives related to accessibility, anti-racism, equity, and inclusion
- Modernizing fare systems and customer access channels while considering customer impacts and barriers to access

### **Operational and Administrative Considerations**

The TTC notes that the matters relating to legacy fare media were considered within the context of significant operational, contractual, financial, and logistical constraints. These included obligations associated with the TTC's transition to the PRESTO fare payment system, operational challenges associated with maintaining parallel fare systems, substantial post-pandemic revenue pressures, and the practical complexities associated with administering potential refund or exchange programs for discontinued fare media without proof of purchase, over many years and varying purchase values.



Operational and logistical considerations associated with administering refunds or exchanges were actively examined throughout the review process, including implementation feasibility, administrative requirements, financial implications, and customer impacts.

Communications relating to legacy fare media were also paused, revised, and scaled back at various stages during discussions with Ombudsman Toronto and in response to feedback and direction received from Board members and stakeholders.

Throughout the investigation process, customer feedback data relating to this matter was provided to Ombudsman Toronto. All customer feedback received by the TTC is taken seriously and each comment is recorded and addressed. The volume of complaints relating to discontinued fare media represented a comparatively limited proportion of the broader operational and customer service matters routinely managed by the TTC.

The TTC appreciates the collaborative and constructive discussions with Ombudsman Toronto throughout this process and thanks the office for considering the TTC's proposed revisions and contextual information.

The TTC welcomes the report's recommendations as an opportunity to continue strengthening governance practices, documentation standards, transparency measures, and public accountability processes across the organization.

TTC staff and the TTC Board accept the recommendations and have included target completion dates for implementation:

**Recommendation 1:** Staff should develop a board-approved process that clearly delineates how fare decisions are made. This process should:

- Define the types of fare decisions that the process would apply to.
- Outline criteria for which fare decisions require board approval and which decisions are delegated to staff.
- Establish criteria for data collection and public consultation to ensure fare decisions are evidence-based and to support fair decision-making.
- Ensure fare decisions are recorded, tied to relevant policies and processes and that the TTC makes its rationale for the fare decision public.

*Target completion: By Q2 2027*



**Recommendation 2:** Ensure that the TTC uses its equity impact analysis tool, or a comparable analysis, when making fare decisions. The use of this equity tool should be incorporated into the fare decision process delineated in Recommendation 1.  
*Target completion: By Q2 2027*

**Recommendation 3:** The TTC should make publicly available a document that tracks the status of board directives and requests to staff.  
*Target completion: By Q2 2027*

**Recommendation 4:** The TTC should develop guidance for staff reports to the board to ensure reports:

- Include key information up front to assist the board and members of the public in understanding the report's contents. This key information should include any approvals, recommendations or actions staff are seeking from the board.

*Target completion: By Q4 2026*

**Recommendation 5:** The TTC should review its current policy documents that apply to fares, including the fare policy goals and the refund policy, to determine which existing policies are relevant and update them accordingly.  
*Target completion: By Q2 2027*

**Recommendation 6:** The TTC should develop a public-facing rider fare policy document to ensure relevant fare information is clear to riders. It should clearly explain the TTC's refund process, including the exercise of staff discretion in assessing individual refund decisions, and ensure that this information is communicated in its responses to riders.  
*Target completion: By Q2 2027*

**Recommendation 7:** The TTC should develop a process for creating, approving and updating policy documents. This process should include which roles are responsible for approvals and updates.  
*Target completion: By Q2 2027*

**Recommendation 8:** The TTC should provide a status update on the implementation of these recommendations and report back on its progress to Ombudsman Toronto on a quarterly basis, until the Ombudsman is satisfied that the TTC has taken adequate steps to address them. Once the recommendations have been fully addressed, the TTC should submit a final report to the TTC board and to City Council.

On behalf of the Toronto Transit Commission,

A handwritten signature in blue ink, appearing to read 'J. Myers'.

Jamaal Myers  
Chair, Toronto Transit Commission