

# **An Anti-Racism Review Of ETS Low-Income Fare Programs**

## **Final Report**



**January 2022**

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# Executive Summary

This is the final report for the Anti-Racism review for Edmonton Transit's low income fare programs: **Donate a Ride, Ride Transit, and PATH (Providing Accessible Transit Here)**.

The purpose of this Anti-Racism review is to:

- Use research data to better understand any barriers that may exist for Indigenous and racialized clients of the Donate-a-Ride, Ride Transit, and PATH programs of Edmonton Transit, including root causes of those barriers.
- Present possible solutions to barriers, offered by the consulting team and the participants themselves.
- Provide recommendations to present ways to reduce or eliminate the identified barriers.

## Major Findings

Generally there were minimal barriers to Indigenous and racialized clients in gaining access to the three fare reduction programs included in this Anti-Racism review.

With regard to the specific administration of the three programs, there were no significant barriers to these population groups when they worked through a community agency. The agencies distributed tickets and passes in an equitable manner and clients were happy with this. There was only one barrier for unhoused people when they had to return the previous month's bus pass in order to collect the new pass.

It was clear that demand for all programs administered by agencies was greater than the number of tickets or passes currently provided.

Barriers also exist for individuals who are not connected with an agency and therefore do not know about the programs and for people who are hesitant to approach any agency for any assistance, even though they need assistance with transportation costs. Agencies were challenged to administer the programs without City assistance with staff costs to do so.

Clients with restricted incomes were not able to travel to important appointments including for medical reasons, or to look for housing or employment. Assistance with the costs of transportation allowed them to engage in these important activities.

## Recommendations

- Re-examine the requirement that PATH clients return their previous month's bus pass. Give agency staff some discretion on this requirement or remove the requirement.
- Increase funds for the programs so that more tickets and passes are available and agencies can compensate staff for their time to distribute them to clients.
  - This would enable agencies to advertise within their programs and other Indigenous and racialized clients to get better access to transportation. In particular consider that the Social Return on Investment of Ride Transit demonstrated a 200% return on every dollar invested in fare reduction programs.
- Increase number of ways clients can get access to subsidized and free transit tickets and passes, by increasing the number of agencies and/or by having these programs available through city offices and staff.
  - Offer additional assistance to clients with mental health challenges.
  - Offer additional assistance to clients who do not speak English well.
- Market the programs widely in Edmonton so that all Indigenous and racialized clients who need assistance to transportation have the opportunity to take part in the programs. In the event that marketing is done more widely, translate all program material into commonly spoken languages in the city of Edmonton.
- Identify and partner with ethno-cultural organizations that serve low-income families, including refugees and newcomers, across the city.

# Introduction

## BACKGROUND AND CONTEXT

At the March 24, 2021 meeting of Community and Public Services Committee of Edmonton City Council, a motion was made to direct City of Edmonton Administration to conduct an **Anti-Racism review** of current low income fare programs to identify barriers and support equitable participation from those who need support, and provide a report back.

In August 2021, the City of Edmonton entered into an agreement with the Centre for Race and Culture as an independent consultant, to evaluate Edmonton Transit's 3 low income fare programs: Donate a Ride, Ride Transit, and PATH (Providing Accessible Transit Here). The review took place between September, 2021 and January, 2022. The consulting team met regularly with the City of Edmonton team to discuss progress of the evaluation.

## ANTI-RACISM REVIEW PURPOSE

The purpose of this Anti-Racism review is to:

- Use research data to better understand any barriers that may exist for Indigenous and racialized clients of the Donate-a-Ride, Ride Transit, and PATH programs of Edmonton Transit, including root causes of those barriers
- Present possible solutions to barriers, offered by the consulting team and the participants themselves
- Provide recommendations to present ways to reduce or eliminate the identified barriers

The findings and recommendations from this review will be used to inform the City Council and Administration's strategies for removing barriers for racialized and Indigenous Edmontonians when accessing low-income fare products and providing equitable services from those who need support.

## PROGRAM OVERVIEW

The three fare reduction programs strive to provide assistance to Edmontonians who live with poverty, to enable them to have better access to transit to help them meet their basic needs. The City of Edmonton has been guided by End Poverty Edmonton, a strategy developed in 2015.<sup>1</sup> This strategy identifies accessible and affordable transit as one of the six game changers to eliminate poverty in the city.

At the time of this review, promotion of the programs occurred through the ETS website <https://www.edmonton.ca/ets/fares-passes>. From time to time there has been additional promotion, but very little had occurred since March of 2020.<sup>2</sup>

### Donate a Ride

This Edmonton Transit program has been in operation for many years. At the time of this review, ETS distributed free bus tickets to 54 city community agencies that provide services in basic needs; health and disability; providing shelter; and general support for seniors, youth, and newcomers. Agencies submit an application to the City of Edmonton to become part of the program. Applications are processed by the Social Development branch. Agencies annually request tickets, which are distributed once each year.

The program was originally funded by donations from the public, and it is the City of Edmonton that now funds it. The general intention is that these tickets are used for emergent needs like medical appointments and looking for employment, and not for regular needs such as attending school or work. Agencies decide which individuals will receive these tickets.

The annual budget for this program changes each year, using a formula based on the annual count of unhoused people.

There is currently a review underway of Donate a Ride and PATH in the context of Smart Fare implementation.

### PATH (Providing Accessible Transit Here)

This program evolved out of the Youth Transit Access Project (YTAP) which recognized that youth living in poverty were being charged with fines for non-payment on transit, and criminalized when

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<sup>1</sup> <https://www.endpovertyedmonton.ca/>

<sup>2</sup> Interview with City staff, Oct. 29, 2021.

fines could not be paid. City staff indicated that this had a disproportionate effect on racialized communities.<sup>3</sup> 100 bus passes were distributed at the inception of the program.

YTAP became PATH in 2016 and was expanded to include adults and youth who are unhoused or are at risk of being unhoused.<sup>4</sup> It provides a bus pass for no charge for a maximum period of three months. The intention of the pass is to help people attend school or work, look for housing, and to attend essential appointments like medical visits. In early 2021, 600 passes were distributed. This was increased to 1900 passes per month later in the year. YTAP was formally evaluated in 2016. The evaluation demonstrated that the social return on investment (SROI) for the program was nearly 200%.<sup>5</sup>

PATH aligns with the priority under End Poverty Edmonton that states in order to move people out of poverty – making transit reliable, accessible, and affordable for Edmontonians is critical.<sup>6</sup>

The City is working with 14 social service agencies who work with clients and this is the only way passes are distributed. Half of the agencies are located downtown and the remainder are in the south, north, and west areas of the city. These agencies normally work with a population that is unhoused and have existing relationships with them. Agency staff know which of their clients qualify for the program and they offer passes to them. Each month every program participant meets with an agency staff member to present the previous month's pass (to avoid passes being sold or given away) and answer a list of questions, including the purposes of their use of transportation that month, gender and age, but not racial group. These statistics are sent to City administration. Agency staff attend a meeting once per month with City staff.

## Ride Transit

This is a subsidized monthly transit pass program. Edmontonians with low incomes are able to purchase adult or student monthly passes at a subsidized rate ranging from \$35 to \$50, depending on income level. Individuals make application to the City of Edmonton, with documentation that shows their income level. Initially the only documentation accepted was the Record of Assessment (ROA) from the previous year's Revenue Canada tax form. This program is entirely administered by the City of Edmonton and not by community agencies as with the other two programs. Ride Transit is permanently funded by the City of Edmonton, and currently supported by a Government of Alberta grant until spring of 2023.

The pilot phase of Ride Transit went through a formal evaluation in 2018. It was found that the ROA was not an accurate demonstration of current income levels and that some groups of people were not able to produce this document. Subsequently there were significant changes to the application

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<sup>3</sup> Interview with City staff, Sept. 10, 2021.

<sup>4</sup> The PATH best practices document outlines 4 categories: emergency sheltered, unsheltered (sleeping rough), provisionally accommodated (couch surfing), and precariously accommodated (temporarily housed with no lease or housing security).

<sup>5</sup> Youth Transit Access Project: Evaluation Framework, Civitas Consulting.

<sup>6</sup> End Poverty Edmonton, <https://www.edmonton.ca/ets/access-pass>.

form. Types of accepted documents were broadened to include other documents: employment insurance, maternity leave, Government of Alberta income support, Canada Pension disability, and documents for permanent residents (new immigrants) and refugees to Canada.

Prior to the Covid-19 pandemic, applications were made in person to a variety of City offices. In October of 2020 a phone channel and a secure website were set up so that people did not need to come to offices in person. Passes were then ordered by phone or through the website and mailed out after payment was made by credit card or auto-debit from bank accounts. Individuals can still pay cash and pick up passes in person at one of four City recreation centres.

## TRANSPORTATION EQUITY

The area of **transportation equity** evolved in the United States after Black people in south central Los Angeles engaged in violent protest against factors which kept them in poverty and their lack of power to improve their lives. The commission that investigated these protests found that protesters felt physically isolated due to lack of access to transportation to get them to employment and essential services such as health care.<sup>7</sup> “The events of the 1960s brought urgency to the long-standing challenge for transportation planning to ensure that the costs and benefits of a transportation system are distributed among people in a way that achieves an acceptable level of fairness.”<sup>8</sup>

Prior to the 1960s, transportation planning functioned within a **mobility framework** with the goal of moving people to their destinations in the fastest way possible. In cities that are designed for people driving cars, “(t)his form of development disproportionately harms racial minorities and low-income people who tend to live near the urban core and who have fewer resources to adapt to dispersed land-use patterns.”<sup>9</sup> In the US, since the 1960s riots, laws have been put in place “... to monitor and detect outcomes that have disproportionately harmed transportation-disadvantaged people, such as racial minorities and low-income households...”<sup>10</sup> Their laws prohibit discrimination in planning.

The **equity framework** promotes the **accessibility** of transit over the **speed** of moving people around cities. “(S)ometimes improving mobility can undermine accessibility...”<sup>11</sup> “Travel to increasingly dispersed destinations might be accomplished at higher speeds, but the geographic spread of these destinations forces travellers to cover more distance, imposing higher costs in money and time that

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<sup>7</sup> Advancing Equity Planning Now, Krumholz, N & Wertheim Hexter, K, eds., Cornell University Press, 2019, <https://www.istor.org/stable/10.7591:j.ctv43vr3d.11> (accessed Oct 21, 2021). Chapter: On the Way but Not There Yet: Making Accessibility the Core of Equity Planning in Transportation, Grengs, Joe.

<sup>8</sup> Ibid, p. 128.

<sup>9</sup> Ibid, p. 131.

<sup>10</sup> Ibid, p. 129.

<sup>11</sup> Ibid, p. 131.



disproportionately fall on those with low incomes....”<sup>12</sup> “... planners should place priority on addressing pre-existing disadvantages by strategically redirecting transportation benefits to people in the greatest need. Mobility metrics are incapable of identifying need. Accessibility-based tools are essential for equity planners to target resources toward underserved people and areas because they directly assess the current distribution of transportation benefits and who experiences them.”<sup>13</sup>

By aligning the goals of the fare reductions programs of Edmonton Transit within End Poverty Edmonton principles, the City of Edmonton is aligning with equity planning principles and the **equity framework** of planning. The commitment to advancing social justice in transportation places priority in serving the least advantaged first and ensuring all people have equitable access to transportation.

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<sup>12</sup> Ibid, p. 131.

<sup>13</sup> Ibid, p. 142.

# Evaluation Methodology

This evaluation is an assessment of barriers which exist for Indigenous and racialized clients of Edmonton Transit in utilizing any of the three reduced fare programs described above. It includes an analysis of root causes for these barriers and presents possible solutions to overcoming any barriers identified.

The following methods have been used:

- Document reviews
- City and Agency staff interviews and focus groups
- Indigenous and racialized participant interviews and focus groups

Key documents reviewed were as follows:

- Project proposal
- Website program descriptions
- Past formal evaluations of Ride Transit and YTAP (the precursor to PATH)
- Relevant sections of City Operations documents

Data was collected for this Anti-Racism review in the following ways:

- 3 interviews with City staff
- For Donate-a-Ride, 2 focus groups with agency staff who administer the program. No participants were consulted.<sup>14</sup>
- For PATH, 2 focus groups with agency staff who administer the program and 2 focus groups with clients of this program.
- For Ride Transit, 17 interviews with program participants. No staff focus groups were conducted as it is city staff who administer the program and these employees are numerous, disparate, and have multiple responsibilities of which administering this program is just one.

City staff were appointed to take part in this review. Researchers attended a PATH agency monthly meeting to explain the review and recruit focus group participants. Focus groups with PATH participants were recruited by two different agencies and held at those agencies. Participants for the Ride Transit interviews were recruited through a mail-out from the City to Ride Transit participants directing them to contact the researchers.

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<sup>14</sup> As the City does not stipulate an application process or specific guidelines on how to distribute free tickets, agencies have control over which clients are given tickets. There is no formal record of who receives these tickets. It was determined that all useful information to this study would be supplied by agency representatives.

Program participants signed consent forms that indicated their voluntary participation in the focus group and ensured the confidentiality of their responses. They were informed that their names would not be attached to their comments following the focus group, either verbally by the evaluator or in writing in any reports produced. They were also informed that they could leave at any time if they were uncomfortable with the discussion and care was taken to monitor any discussion that may have triggered an emotional response. All focus group and interview participants stayed and contributed eagerly to the discussion. A set of questions was prepared in advance, with opportunities taken to explore issues and clarify answers using an exploratory process where participants were free to answer questions as they wished.

All interviews and focus groups were audio-recorded with the written permission of participants. They were then transcribed and analysed using qualitative data analysis software<sup>15</sup>.

During the data collection, general issues of racism were revealed which were outside the scope of this review. All the content related to other instances of racism and discrimination outside of low income fare programs are presented in the ancillary report.

## LIMITATIONS

The potential for researcher bias was controlled by contracting an independent organization with expertise in Anti-Racism and the ways racial discrimination operates within organizations. City staff outlined their expectations in meetings and gave input to the review process.

Only clients of the programs were consulted, not potential clients who would qualify but were not making use of the program. Questions were asked of agency staff and program clients in an attempt to identify any barriers for these potential clients.

Using in-person focus groups and interviews virtually eliminated any potential issues with respondents not understanding questions or answering them incompletely. A standard list of questions were asked but additional questions of clarification and further searching for answers was used to lessen the effect of low literacy levels and language comprehension problems.

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<sup>15</sup> QDA Miner Lite

# Data Analysis

Analysis of data is presented separately for each of the three programs, followed by some general data on Edmonton Transit experience by Indigenous and racialized clients.

## DONATE A RIDE

Data for Donate a Ride was gathered through focus groups for staff from agencies who have been accepted into the program by the City of Edmonton. Participating agencies had utilized Donate a Ride for a time period ranging from one year to many years. Agencies had different mandates but all served communities marginalized due to health problems or low income with some agencies serving specific population groups within the Indigenous or immigrant communities. Where agencies had a general mandate to serve people with low incomes, a high proportion of clients are Indigenous or racialized as these population groups live with poverty at a rate higher than does the general population. For the most part tickets were distributed to clients of these agencies when the agency staff identified that transportation was limiting the client's ability to search for employment, attend essential appointments, and participate in the programs offered by that agency. Tickets were given out for intermittent transportation needs, not regular and ongoing needs such as attending school or employment. Clients needing to travel on a regular basis were referred to Ride Transit or PATH which supply monthly bus passes. Agency staff did not advertise the availability of bus tickets to their general client base because, if they did advertise, the number of tickets received would not cover the demand.

A few clients did request tickets of their own volition, having heard of the program through word of mouth.

Agency staff were highly appreciative of the program, stating that the tickets were well used by extremely vulnerable people who lacked access to transportation.

## Barriers

**Social Isolation** – This barrier applies to any individual in the city who is socially isolated and not connected to any of the participating agencies. When identifying barriers for Indigenous and racialized people to utilize all three fare reduction programs, those people not connected to an agency are simply not able to participate. While this barrier applies to the general population, it does disproportionately affect Indigenous and racialized people, as they are more likely to have low income.

**Income Level** – The income level of the majority of clients of participating agencies is so low that they often do not travel even when they need to. Ironically, lack of access to transportation limits

their ability to participate in Donate a Ride because they do not have the ability to purchase a ticket to get to the agency.

*They (clients) don't have the transportation to get to us in the first place.*<sup>16</sup>

*... there are some times where the person can't even get on the bus to get to our agency because they are denied and don't have the \$3.50, like seriously it gets that bad when they are like living on fixed incomes of what, \$700 a month?*<sup>17</sup>

**Stigma** – Agency staff identified barriers for people coming into their agencies at all. Staff identified a stigma that clients perceive when they seek assistance from these agencies with the exception of those that work with people with common health conditions. The step of asking for help and going in the door to an agency is often difficult.

**Going to a downtown agency** – This is a barrier for many clients. Staff indicated that agencies and clients in the downtown core are perceived as being more affected by drug and alcohol use and criminal activity, which may trigger emotions for these clients.

*(f)or a lot of folks that we see, they don't want to go downtown, right, they are afraid, it's triggering for them.*<sup>18</sup>

Or, they simply do not know that they can receive services from these agencies and therefore they have never heard about Donate a Ride.

**Language** – If the program were available more widely, this would become a barrier. This was not a significant barrier for racialized immigrants to Canada who do not speak English well because tickets are distributed by agency staff who also speak their language.

**Shortage of tickets** – Agency staff consistently reported that they did not have enough tickets to meet the demand.

*So we always run out of Donate a Ride tickets before the end of the year.*

*We never get enough tickets to meet the demand. We got them I think in May ... and they are all gone.... Even though we are very careful ... there's never enough.*

*We could use more tickets.*

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<sup>16</sup> Donate a Ride agency focus group #2.

<sup>17</sup> Ibid.

<sup>18</sup> Ibid.

*I think the program needs to be expanded.<sup>19</sup>*

Demand for bus tickets had increased during the Covid pandemic and since spring of 2021 when the redesign of Edmonton bus routes occurred.

*... since the redesign of transit, I hear from my outreach workers that we have had to use more tickets because the transfer doesn't work. So it's taking them longer to get places than it did before.... So they sometimes need more than one ticket for a trip...<sup>20</sup>*

## Program Solutions

The solution to the shortage of tickets is to give them **more tickets**, said agency staff.

**Market the program** – Barriers for Indigenous and racialized people not connected with an agency and/or socially isolated is to advertise the program in the community. This would require offering more free tickets as demand would increase drastically. \*This was recommended also in the Ride Transit evaluation, 2018.<sup>21</sup>

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<sup>19</sup> Ibid.

<sup>20</sup> Ibid.

<sup>21</sup> City of Edmonton: Ride Transit Pilot, Program Evaluation 2018, Anderson, Draper, p.5.

## RIDE TRANSIT

Data for Ride Transit was collected through interviews with Indigenous and racialized clients of the program. This program is administered solely by City of Edmonton staff, no social agencies are directly involved.

Transit clients who were interviewed indicated that they heard about Ride Transit through family or friends, or from social workers. They had used the program from a few months to many years. They appreciated the subsidized bus pass and said that it allowed them to travel around the city to participate in society in many ways.

### Barriers

**Complexity of Application** – Some participants found the application process to be complicated and others had no difficulty with it. Those that had difficulties often asked a social worker to help with the application. Note: The previous evaluation of Ride Transit demonstrated challenges with the application process. There were substantial changes to the application.

**Assumption that bus pass was counterfeit** – Some participants had their bus passes confiscated by bus drivers or peace officers when they assumed the pass was counterfeit. These people felt targeted because of their race and/or their income level.

**Give more assistance to clients who require it.** The previous evaluation recommended strengthening the application process and evidence gathered during this review indicated that the process was satisfactory to most clients, especially the expansion of documents to prove income level beyond the Record of Assessment. There were, however, some clients who still had difficulty.<sup>22</sup>

### Program Solutions

**Offer Support to Applicants** – Develop a way for those needing assistance with the form to ask clarifying questions from city staff.

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<sup>22</sup> Ibid, p. 4 & 5.

## PATH (Providing Accessible Transit Here)

Data for this section was gathered through focus groups with agency staff who administer the program and focus groups with participants. Participating agencies work partially or exclusively with the unhoused population. Each agency has developed close relationships with their clients, know about their housing issue, and make the decision on who is offered a monthly bus pass.

While many clients are already working with these social agencies, there are clients who come to the agencies because they have heard of PATH by word of mouth, or through other agencies or social workers. Some clients had heard of the program because they receive Assured Income for the Severely Handicapped (AISH) and had heard of PATH through their AISH social worker. At times the social worker accompanies the client to the agency to talk about the bus pass.

Agencies offered the pass on a first come first served basis to those who qualify based on the housing criterion. The only reason someone who qualifies would not get a pass is if the agency had no more passes available. Agency staff were pleased that they could request more passes and acquire unused passes from other agencies.

Clients and agency staff were pleased that the program was available. It allowed them to be transported around the city to essential appointments, work or school, to search for housing, to get food, and to maintain social connections. It was very clear that without access to transportation it would be extremely difficult to take steps to acquire and maintain housing.

## Barriers

### Not connected with an agency

This issue is explained on page 12. Some clients do not know of the PATH program because they are not connected to any agency. As Indigenous and racialized people are disproportionately affected by poverty and lack of housing, it affects them at a higher rate than the general population.

*Maybe they think it's a big procedure to get on the program, I believe that we probably are missing a lot of people that could benefit from the program, probably more so during Covid... maybe they are choosing not to go to agencies.*

*I think that stigma is a huge part of it ... and sometimes it might be just because they feel that they don't need to be connected (to an agency) because they have most things sorted out or supported ... sometimes they just have very specific ideas of what our agencies ... things that they do.<sup>23</sup>*

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<sup>23</sup> PATH agency focus group #1.



As discussed previously in this document, some clients are uncomfortable going to downtown agencies. Agency staff and clients perceived the bulk of agencies to be located in the downtown area.

*(Our agency) can be a little intimidating for some folks to come because it is quite a chaotic area. There is always something around the building, people are using (drugs), people are camping around (the building)... so it can be quite a different dynamic than people are used to.<sup>24</sup>*

*Because the first thing that they are thinking is drugs, addictions... there are persons that will not access the services even though they need it.<sup>25</sup>*

Some clients do not understand that they qualify for the PATH program because they do not consider themselves unhoused.

*I think when people hear that they would have to go to (an agency) people think they only work with people living on the street.... And they don't want to be associated with that, or they don't feel that they fit there because they're not on the street, even if they might be couch surfing....<sup>26</sup>*

*Lot of Indigenous folks stay with extended family and that's just their way of living so they would never consider themselves homeless ... if you asked them straight up if they were homeless, they would say no.<sup>27</sup>*

### **Mental Health Barriers**

Clients with mental health challenges experience intensified barriers with finding out programs exist and completing application forms.

*For people with like mental health (problems) I think it's trying to get out of your safe zone and like truck across the city...<sup>28</sup>*

### **Not returning previous month bus pass**

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<sup>24</sup> Ibid.

<sup>25</sup> Ibid.

<sup>26</sup> Ibid.

<sup>27</sup> Ibid.

<sup>28</sup> Ibid.

The requirement of having to return the previous month's bus pass created barriers for these unhoused people, whose lives are complicated by the root causes of their poverty. By not having a safe place to live and store items, they are susceptible to having passes stolen from them and just have a more difficult time holding on to the pass. Agency staff indicated that this happened fairly frequently and was the only reason people were denied participation in the program.

*I think it's the same for all of our folks who are experiencing homelessness, is that hanging onto the pass is the big problem.... It could just be they are using, using drugs, can't hang onto it, it gets lost, people steal things from them...<sup>29</sup>*

*... primarily with Indigenous folks, although again that is the vast majority of our (participants) anyways, they seem to be more likely to share their pass within their family ... so sometimes it is a problem for them to be able to show the bus pass at the end of the month to get the next month's pass.<sup>30</sup>*

### **Agencies lack staff capacity to administer program**

While agency staff were highly appreciative of the PATH program because it helped their clients who were unhoused, they were challenged with finding time to administer the program. The City of Edmonton distributes transit passes to agencies but does not compensate them for staff time. Staff indicated that while they may need more passes, they may not request more because of this resource challenge.

*(T)here is a lot more to it than just giving out a bus pass. So there is the time commitment and that is hard with staffing and actually doing the paperwork for the agencies that are doing over a hundred (bus passes distributed). Like I do 30 and sometimes I want to pull my hair out because like doing 30 is a lot.<sup>31</sup>*

*Overall I think it is a lot of work, um to meet with people every month and to try to track people down to do all the data collection... it takes a lot of time and I think it's a really important program ... but it's a lot of work.<sup>32</sup>*

## **Program Solutions**

### **Re-examine requirement of returning previous bus pass**

As loss of bus passes is often caused by the extremely difficult life challenges of the unhoused, give agency staff some discretion or remove the requirement entirely.

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<sup>29</sup> Ibid.

<sup>30</sup> Ibid.

<sup>31</sup> Ibid.

<sup>32</sup> Ibid.

**Expand PATH administration beyond social agencies**

In order to make PATH equitable among racial groups in the unhoused population, agency staff suggested that the City find more avenues people could use to get access to the program.

*(M)aybe there could be additional... expanded with ETS to say that if some of the places that sells bus passes offers (PATH bus pass) is an option.*

**Expand number of agencies**

Once again, Indigenous and racialized clients (and indeed all clients who qualify) would be more equitably served if the program were more widely advertised and more widely available. This would also help those clients who are uncomfortable coming to downtown agencies. This could include more ethno-cultural and immigrant-serving agencies.

*(H)aving more agencies that service racialized newcomers to be part of the program, I think that might reduce a bunch of barriers.<sup>33</sup>*

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<sup>33</sup> PATH agency focus group #2.