

December 8, 2016

Community and Protective Services Committee
London City Council
300 Dufferin Ave
London, ON. N6A 4L9

Dear Community and Protective Services Committee Members:

RE: Transit Subsidy Model – Public Consultation

Neighbourhood Legal Services is a poverty law clinic assisting low income individuals/families who reside in London and Middlesex County with legal issues in a number of areas, including: Ontario Works, Ontario Disability Support Program, Canada Pension Plan Disability, Landlord/Tenant issues, Employment Law, Criminal Injuries Compensation. Due to the nature of our work, we are regularly made aware of the challenges and difficulties that low income individuals/families encounter. Part of the clinic's mandate is law reform, and ensuring that the interests and concerns of low income Londoners/Middlesex County residents—those on social assistance, fixed-income, or working poor—are made known and are taken into consideration in the area of public policy.

As well, Neighbourhood Legal Services co-chairs the London Community Advocates Network. The London Community Advocates Network is comprised of approximately 50 community agencies who assist recipients of OW and ODSP benefits. We meet as a group on a quarterly basis with staff from both program areas to provide input regarding local and provincial issues and policies affecting the vulnerable population that we serve. Due to our involvement with the London Community Advocates Network, we are keenly aware of how difficult it has been for low-income Londoners to meet their basic needs and the shortfalls/gaps in current programs such as the Discretionary Benefits program and the Housing Stability Bank.

In light of the above, Neighbourhood Legal Services would like to make the following comments and share our main concerns with respect to the proposed Transit Subsidy Model.

We support, in principle, the move to a transit subsidy based on income (an individual's ability to pay) for the following reasons:

- The purpose of a subsidized transit model, as noted in the November 15, 2016 report to CAPS, is better met by a subsidy based on income.
- A member of our clinic was part of the 2013/2014 stakeholder's group and from our participation, it is our opinion that a move to a transit subsidy based on income is a fairer/more equitable program than the current subsidy. For example, the visually impaired currently receive a 100% subsidy. There are other individuals with disabilities, however, who are unable to operate a motor vehicle (such as those with epilepsy or developmental disabilities) and need to rely on the LTC. At this time, these individuals receive no subsidy whatsoever.

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- Many individuals on ODSP cannot afford the full cost of a bus pass. Thus, they cannot adequately participate in the community and face transportation barriers when it comes to accessing treatment. This is also true for OW recipients who do not get a bus pass as an employment support benefit. For example, single mothers with children under the age of 4 who are deferred from seeking employment do not receive a bus pass. The same is true for those medically deferred from seeking employment who do not have extensive medical transportation costs.
- Low-income seniors who need to rely on LTC the most and require a monthly bus pass would see an increase in their subsidy from 25% to 50%. This allows them better access to health care and community agencies.
- A move to a transit subsidy based on income was a recommendation of the Mayor's Poverty Panel after extensive consultations with the community. As well, the London Community Advocates Network also endorses a subsidy based on income.
- We support the income/eligibility test for the subsidy to be the Low Income Cut-Off (LICO).
- We support the level of subsidy at 50%. We believe a subsidy less than 50% would not be a sufficient incentive for low-income Londoners to purchase a monthly bus pass with their limited financial resources.

Administration of the Program

Is the program capped? We would prefer to see the proposed program implemented without a cap, as per the current subsidy model. If the demand for the new program far exceeds the budget of the current program, further direction can be requested from council.

We believe the current funding of approximately \$600,000 would not adequately address the demand for the program. This amount would only cover around 1200 bus passes. This is more, however, than the current programs approximate 970 bus passes for seniors and the visually impaired. If Council decides to cap the program, then a properly managed wait list is needed to identify the extent of the need and assist in future City budget deliberations.

One concern about administering the program is the cost of administration. The higher the cost of administration, the lower the amount of funds available to subsidize bus passes. We suggest the possibility of having the OW Discretionary Assistance program administer the transit subsidy be reviewed. This program currently utilizes the LICO test for a number of discretionary items. This would hopefully minimize administration costs as the Discretionary Assistance program is one that is already in place.

We feel that providing a transit subsidy to low-income Londoners is an important issue for our community.

Yours truly,

Mike Laliberte
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