



Transit Division (HSR)  
Public Works, City of Hamilton  
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February 21, 2024

James Kemp  
Chair  
Advisory Committee for Persons with Disabilities  
City of Hamilton  
City Hall, 71 Main Street West  
Hamilton, ON L8P 4Y5

BY EMAIL: [REDACTED]

**Re: HSR Fare Assist Program and the Cancellation of the Temporary No Pay Program and the Temporary Voluntary Pay Program**

Dear James,

The letter from the Advisory Committee for Persons with Disabilities (ACPD) to City Council, dated December 15, 2023, regarding the HSR Fare Assist Program, was referred to me for response through the General Manager, Public Works. We acknowledge the concerns outlined in the letter, viewing community feedback as crucial for the City of Hamilton's Transit Division (HSR) to deliver a safe, accessible, and efficient public transportation system.

The Fare Assist Program was first introduced on April 3, 2023, with public consultation taking place until May 31, 2023, and was unanimously approved by Council on July 12, 2023. At its meeting on December 13, 2023, Council agreed to a six-month grace period ending June 30, 2024, for customers currently accessing the Temporary Transit Special Fare Program. This allows customers an additional six months to apply and transition to the new program. Staff will report back to Council in September 2024 regarding this transition and at varying intervals throughout the 30-month pilot.

The new Fare Assist program now requires that all customers pay a fare, and we acknowledge this as a change from the former "voluntary pay" option. Hamilton is the only transit agency that has offered a voluntary pay program for persons using a mobility device (wheelchair, walker, scooter), and while some agencies allow CNIB cardholders to ride without fare, it is not consistent. Most municipal transit agencies require all passengers to pay a fare and board through the front door, where the farebox is located.

There is nothing definitive in legislation or the City of Hamilton's policies and procedures that explicitly states where a person using a mobility device boards the bus, and the normative practice throughout the Province and beyond, is front door boarding.

We appreciate that change requires transition, and we are committed to supporting customers through the change to the new Fare Assist Program. Transit is providing in-person training, and training materials are being made available to support customers through the change of using the front door, including accessible videos which will be posted in the coming weeks.

The PRESTO payment system is owned and operated by Metrolinx and is used by transit agencies across the province. The PRESTO fare reader is in service on buses, rail lines, subways, and streetcars operated by GO Transit, the UP Express, Hamilton (HSR), Burlington Transit, Oakville Transit, Mississauga (MiWay), Brampton Transit, York Region Transit, Toronto (TTC), Durham Region Transit (DRT), Ottawa's OC Transpo, and is used by millions of riders each day. Metrolinx's PRESTO website invites feedback on accessibility for people with disabilities at [accessibility@metrolinx.com](mailto:accessibility@metrolinx.com). Customers are encouraged to contact Metrolinx for support and assistance as required.

Importantly, the Metrolinx Accessibility Advisory Committee members provided user testing feedback during PRESTO development. PRESTO offers various payment options which include physical payment cards that may be loaded at multiple locations or online, or an app for those with smartphones. Accessibility features for visually impaired customers include the following:

- The device provides audio feedback to let the customer know when their tap has been accepted or declined.
- The device decals and text have high color contrast.
- A Braille letter "P" on PRESTO cards to help distinguish it from other cards in a wallet.
- The PRESTO card reader has a raised circular outline for tactile feedback.
- The barcode reader has a raised rectangular outline for tactile feedback.

In addition, the location and positioning of the PRESTO devices on transit buses are based on installation manuals that cover the accessibility requirements for height and access to the devices, which have been followed.

Please note that the City's Transit Division fully meets the legislative requirements outlined in the AODA transportation standard. The front door is fully accessible for mobility devices, and the buses meet the AODA requirement for sizes outlined in O. Reg. 191/11, s. 55.

In 2021, the Transit Division was subject to a desk audit by the Ontario Ministry for Seniors and Accessibility and was found to be compliant based on documentation provided, including the Fares, Fare Parity and Fare, Support Persons sections (S. 38.(1), 46.(1,2), 66.(1,3,5,6)), and General Responsibilities (S. 44.(1,2)) of the Integrated Accessibility Standards Regulation.

We recognize that there may still be individuals who require accommodation to utilize conventional transit, and we will work with individuals to review possible accommodation options when they make their needs known to the Transit Division by contacting HSR's Customer Service line at 905-528-4200 option 2 to book an individual training session with an experienced Transit Instructor and to make a request for reasonable accommodation on a case-by-case basis.

The City of Hamilton continues to offer Accessible Transportation Services (ATS) to people with physical or functional limitations or health conditions who are unable to use the regular HSR bus. ATS service is delivered by a contractor and subcontractors.

Eighty percent of trips taken on specialized service are by individuals who do not use mobility devices, and the contractor has increased the number of Promasters in the fleet, which will better serve both people with and without PMDs and provide more flexibility. In addition, enforcing late cancellations and no shows in early 2024 is expected to improve vehicle productivity and help improve both cost per trip and the trip denial rate, which remains within the 2004 Ontario Human Rights Commission decision guideline. What remains unknown at this point is what factors will influence customer choice to use specialized versus conventional transit when fares are equally discounted, and this will be monitored to determine impact. As always, the City of Hamilton continually reviews opportunities to improve the efficiency of both conventional and specialized transit services and uphold all legislative requirements.

The City's Transit Division is confident that with support, customers will become increasingly comfortable using the front door. We continue to welcome feedback and suggestions and encourage customers to contact HSR customer service at 905-528-4200 option 2 to report any concerns so that appropriate action can be taken.

With thanks,



Maureen Cosyn Heath  
Director, Transit Division  
Public Works, City of Hamilton

cc: Carlyle Khan, General Manager, Public Works, City of Hamilton