

RE: Memorandum on Item PW25020: Correction to Delegation Information on Fare Assist Program Eligibility

Dear Chairperson Kemp and Committee Members,

I'm writing to you today in response to the memorandum provided by Manager Nancy Purser regarding my previous delegation on Fare Assist Program Eligibility. This memorandum purports to be a correction to my delegation—however, I wish to provide further clarification to my own remarks and to question the nature of this correction.

The memorandum remarks that my statements are essentially false as the current program relies on a notice of assessment from the Canada Revenue Agency to illustrate income which purportedly makes “Fare Assist Program [...] open to all Hamilton residents with household income below the Statistics Canada Low-Income Measure” regardless of income source.

This misrepresents a fundamental issue that we take with this program. First, let us be clear: being *technically* eligible *if* you fit other criteria or provide other paperwork is not the same as simply being eligible by right for being part of one of these social assistance or membership programs—which was the core of my commentary to you all on this specific point.

Using inclusion in these programs as a measure or path to eligibility rather than *just* requiring the production of a notice of assessment is very much what we're getting at with our proposal for a sibling program. Disabled communities, particularly Indigenous, Black, and racialized disabled communities have long spoken to barriers with using the CRA as a means of assessment—particularly when inclusion in social assistance and employment insurance programs are already arduous for our community members. This is a piece of context that I know members of our disabled communities understand, but clearly members of HSR staff do not.

For a related example, I would ask members to consider the similar barriers that these eligibility requirements create to those found in the Canada Disability Benefit. Our recommendations are informed by parallel thinking on these barriers through the use of the income tax system.

Daniel Béland and Samuel Ragot have [described](#) the core point on CDB eligibility as:

...many organizations had suggested that people benefiting from provincial or territorial disability-specific financial assistance plans should automatically qualify. This idea was intended to avoid potentially eligible people from having to fill out a new series of forms, relying instead on the exchange of information between governments.

DJNO is one such organization that has made this very criticism of the CDB. This issue is mirrored in the implementation in Fare Assist and creates an eligibility barrier, particularly to those who have not been included in public facing promotions (CPP-D, WSIB, and other recipients). Updating information on the Fare Assist website or other materials, does not resolve this barrier and, in our view, this remains a fundamental concern. While we also believe

that other programs that are not income-based should be part of discussion on eligibility (like CNIB membership), the fact is that income tax-based assessment is not sufficient to ensure *actual*, practical access to this program. Proof of enrollment in these social assistance and support programs should simply be enough—that is the point of the discussion for a sibling program.

Further, for Black, Indigenous, and racialized disabled communities, there are clear intersecting barriers to filing taxes *in general* that have led some to call for limited automatic or assisted filing services from the CRA (as in this article from [the National Observer \[link\]](#)). We know that Black, Indigenous, and racialized disabled communities are not often given needed focus when developing program eligibility criteria and known barriers to communities are often left to the wayside—as they have been through the development of Fare Assist and as we would seek to correct with any new programs.

Finally, having additional—and not removing this route to eligibility—pathways to eligibility is something that we are only asking for a further exploration for future programs in consultation with disabled communities in Hamilton. We do not believe that these issues are resolved by one-size-fits-all solutions and require deeper examination with HSR and with the community together.

Issuing a ‘correction’, as presented by Manager Purser in this memo, misses the mark of our ongoing criticism of eligibility of existing programs and lacks the deeper context—from both policy and lived experience perspectives—that my comments come from. Again: being *technically* eligible *if* you fit other criteria or provide other paperwork is not the same as simply being eligible by right for being part of one of these social assistance or membership programs—which was the core of our commentary. It remains necessary to rethink how we understand one-size-fits-all approaches like is being suggested with Fare Assist’s eligibility criteria. Until people in these programs can access Fare Assist or new sibling programs without additional barriers, this criticism and recommendation for change will remain.

Thank you all for your time.

With kind regards,



Brad Evoy

Executive Director,

Disability Justice Network of Ontario