Preliminary Assumptions: Strategy Concepts in Development

Strategy Concepts	What it is	Impacts		Implementation Considerations
		Uptake	Equity and Access	MTC / Agency Financial Implications

Auto-Enrollment

Strategy Concepts	What it is	Uptake	Equity and Access	MTC / Agency Financial Implications
A1 - County Partnerships (example used: CalFresh / EBT)	Upon successful application for CalFresh or electronic benefits transfer card, a Clipper START card will also be provided as part of the benefit package without need for additional application to MTC. There were no existing examples of direct auto-enrollment for means based programs based on initial review of peer programs.	Uptake can **expect to increase** if Clipper START is added to the CalFresh package upon application. This will likely be achieved through including messaging about Clipper START to CalFresh outreach and communications.	There is significant overlap between the demographics who would be eligible for CalFresh and EBTs, and those who are most dependent on public transit. Given the wider awareness and popularity of CalFresh, auto-enrolling recipients with Clipper START can improve both uptake and uptake rates within the existing pool of eligible applicants.	Adding Clipper START to CalFresh may only impose limited cost burdens on MTC beyond initial set up costs. Some administrative costs associated with eligibility verification would be reduced, but the magnitude depends on what proportion of new applicants would be applying through CalFresh. Examples of additional MTC functions and costs may include inter-program coordination and fraud monitoring. Overall the cost impact would likely be **neutral**.
A2 - Transit Agency Partnerships (example used: Peer Agency Programs)	Upon successful application and receipt of a transit benefit at an identified peer transit agency in the Bay Area, recipients will also automatically receive a Clipper START card without need for additional application to MTC.	Uptake can be expected to **marginally increase** in the localized peer program area (i.e. San Francisco for LifeLine), but systemwide uptake improvements would not manifest unless MTC establishes auto-enrollment with all local agency programs across the nine counties.	Pairing Clipper START to a local transit agency program can be beneficial in simplifying the various Clipper programs and products available across the Bay Area. There is likely a sizeable overlap (clearly so with LifeLine) between populations eligible for a local means based transit benefit and Clipper START.	Cost impacts may be limited, with inter-program coordination and fraud monitoring being drivers of additional cost. Cost savings would likely also be limited as the pool of auto-enrolled applicants would be small relative to the overall eligible population. Overall the cost impact would likely be **neutral**.
A3 - State Partnerships (example used: Medi-Cal)	Upon successful application and receipt of Medi-Cal, a Clipper START card will also be provided as part of a benefit package without need for additional application to MTC. There were no existing examples of direct auto-enrollment for means based programs based on initial review of peer programs.	Uptake can **expect to increase** if Clipper START is added to the Medi-Cal package upon application. This will likely be achieved through including messaging about Clipper START to Medi-Cal outreach and communications.	There is significant overlap between the demographics who would be eligible for Medi-Cal, and those who are most dependent on public transit. Given the wider awareness and popularity of Medi-Cal, auto-enrolling Clipper START can improve both uptake and uptake rates within the existing pool of eligible applicants.	Adding Clipper START to Medi-Cal may only impose limited cost burdens on MTC beyond initial set up costs. Some administrative costs associated with eligibility verification would be reduced, but the magnitude depends on what proportion of new applicants would be applying through MediCal. Examples of additional MTC functions and costs may include inter-program coordination and fraud monitoring. Overall the cost impact would likely be **neutral**.

Self-Verification

Strategy Concepts	What it is	Uptake	Equity and Access	MTC / Agency Financial Implications
S1 - Automatic Digital Verification	Use of financial services technologies to verify an applicant's eligibility, such as income. This alleviates the need for manual verification of documents, instead relying on automated processes to connect to external databases such as payroll providers, banking institutions, or tax files. Applicants would be required to have a digital financial presence, such as a bank account or electronic payroll.	This strategy can make application processes easier and less time consuming for those who can use the digital process; however on its own it does not widen the eligibility pool or significantly improve outreach. Coordinated marketing with the Cal-ITP project may help uptake, but overall the **expected impact is more aligned to neutral**.	Digital verification services, by definition, would require access to an electronic device whether by phone, tablet, personal or public computer. For income verification, electronic banking records, statements, or other documents would be necessary, which can be a barrier to unbanked individuals. These individuals will have to rely on existing manual verification processes. Automated digital verification can also improve accessibility if tied to platforms that have other benefit programs, reducing the need for multiple applications and helping centralize benefits in one place.	Reducing the amount of manual verifications can significantly **reduce administrative costs** for MTC in operating the program, and defend against fraud. Digital verification services can be costly depending on the approach taken. Private companies that provide for banking institutions are likely to charge a premium for their background check services, but partnering with Cal-ITP may prove more cost effective and aligned with Clipper START's goals.
S2 - CBO Peer Verification	An applicant's eligibility would be verified and "vouched for" by identified third party community based organizations (CBO), reducing the burden on MTC to conduct verification.	Uptake is **likely to increase** especially where CBOs can serve as local community liaisons to raise awareness and help applicants complete applications. The San Mateo 101 Express Lanes program leveraged the County's Core Service Agencies Network of local nonprofits and community organizations to reach individuals in need. In Q4 of FY2023, 2,426 benefits were issued where 81% (1,964) were Clipper cards containing $100.	CBOs typically have a deep understanding of their local communities, and have relationships and trust with community members that government agencies may not typically have. CBOs are important stakeholders in reaching those that may not be adequately engaged by agency outreach efforts, have language barriers, disabilities, or may simply be hesitant to engage with government. For equitable and effective implementation, this effort should be a true partnership with CBOs rather than using them as a vehicle for engagement; they should be involved in policy and planning conversations to co-create accessibility improvements and provide feedback on the program.	Coordination between MTC and CBOs would be extensive; the precedent set by San Mateo 101 Express Lanes demonstrates that. Over 20 workshops and working sessions with a range of regional partners and CBOs were conducted, to build capacity and develop program administration protocols. These measures would likely be the main drivers of agency **cost increases**, with some savings from reduced eligibility verification responsibilities on MTC's part. CBOs were part of Clipper START program promotion and application assistance in the pilot phase, so some level of CBO network exists. However, could be leveraged more extensively.
S3 - Open Self-Verification (Honor System)	Applicants would self-declare on the application that their income falls below the eligibility threshold without any external review and verification.	Over time, self-verification has the **potential to drastically increase uptake**, depending on how marketing and outreach is conducted. This strategy could be the most high risk but also potentially highest reward approach in increasing uptake.	Self-verification removes many application barriers for those who need the benefit, particularly those who do not have access to income eligibility documents.	There is no way to accurately predict the magnitude of increases in both uptake and funding required to adequately operate a self-verification system that has been established and gained traction over time. The cost may also be impalatable for some transit agencies and operators where passenger fare revenues comprise a larger proportion of their overall operating revenues. While overall administrative costs from eligibility verification would be **significantly reduced**, some application processing and verification would still be needed for proof of residence and other information besides income.

Change Income Eligibility

Strategy Concepts	What it is	Uptake	Equity and Access	MTC / Agency Financial Implications
C1 - Universally at 400% of FPL	The eligibility threshold to participate in Clipper START would be universally increased to 400% of the Federal Poverty Level.	Uptake can be expected to **increase substantially**, however the *rate* of uptake may stay the same. Because this strategy widens the pool of eligible recipients as a source of increasing uptake, the uptake *rate* may not increase without commensurate marketing and outreach efforts.	More people would have access to Clipper START, but the eligibility verification processes would not change and many existing barriers to uptake would remain. From an equity standpoint, the implications are not too different from existing conditions. 400% of FPL is a common threshold for subsidised health insurance and federal tax credits, and there may be opportunities to collaborate on benefits outside of transportation.	Beyond the cost of subsidising more passes, administrative costs in manually verifying a larger number of applications **would increase**. Especially if the newly eligible applicants would not be eligible to apply through CalFresh or other benefits, the administrative burden of manual income verification would fall on MTC staff and budget.
C2 - Area Median Individual Income Threshold (County-Specifc)	The eligibility threshold to participate in Clipper START would be changed from a percentage of the Federal Poverty Level (FPL) to being below the median individual income for the applicant's county.	Uptake would **likely increase** as the AMI in the Bay Area is likely to be higher than the nationally determined FPL, but this would depend on what percentage of AMI is set to be the threshold.	The cost of living across the nine counties in the Bay Area differ, and adopting a county-specific income threshold would demonstrate sensitivity to the varied contexts and definitions of poverty. Especially in counties where the cost of living is much higher than the national average, this approach can be more equitable than a blanket federal poverty threshold.	Beyond the cost of subsidising more passes, administrative costs in manually verifying a larger number of applications **would increase**. Especially if the newly eligible applicants would not be eligible to apply through CalFresh or other benefits, the administrative burden of manual income verification would fall on MTC staff and budget.

Working Program Examples: Preliminary List

Below is a running list of program examples from preliminary research, some general information about the program, the relevance to Clipper START, and links to relevant websites. Staff anticipates additions to this list.

Program	Agency	General Information / Eligibility	Relevance to MTC Clipper START	Links	Strategy Concept
LiVE	RTD (Denver, CO)	x. Be between the ages of 20 and 64 x. Be at or below 185% Federal Poverty Level x. Provide a valid address for your eligibility card x. Live in the RTD service area x. Supply gross household income verification x. Provide a recent photo	x. Regional Program x. Adopts the Federal income poverty levels x. wide range of residents	https://www.rtd-denver.com/LiVE#qualify	A1 - County Partnerships, A3 - State Partnerships
RTC (Regional Transit Connection) - 511 Bay Area	MTC	Applicants to the RTC program can choose to apply using either Basic or Medical eligibility. xx. Basic Eligibility: x. Applicants under 65 years of age must have a Medicare card (the federally-issued red, white, and blue card). Note: Medi-Cal is not accepted. x. Possession of a California DMV Placard Registration parking placard receipt. x. Possession of another transit agency card within the U.S. that is equivalent to the RTC card or ADA Paratransit certification outside of a Bay Area transit agency. x. Proof of Veterans Disability-- A copy of your Service Connected Disability ID card and your VA Certification letter demonstrating a disability rating for aid and attendance, or for a service-connected disability with a rating level of 50% or higher. x. For ADA Paratransit, please provide the name of the Bay Area transit agency ADA-paratransit eligibility was established. xx. Medical Eligibility: To apply under "Medical Eligibility" there must be a licensed professional certify their disability	x. Participation of multiple agencies x. Auto-verification if "Other Transit Agency card equivalent to RTC or ADA Paratransit certification outside of a Bay Area transit agency."	https://511.org/transit/rtc-card/eligibility	A1 - County Partnerships, C1 - Universally at 400% of FPL
Cal-ITP (California-Integrated Travel Project)	Monterey-Salinas Transit	x. older adults (65 and up) to tap to pay a discounted bus fare at participating transit agencies.	x. State wide effort x. Cost effective x. Minimizes Admin efforts x. Digitally administered x. State ID verification	https://www.calitp.org/press/cal-itp-benefits-launch	S1 - Automatic Digital Verification
Lifeline	SFMTA	The Lifeline Pass is a Muni-only monthly pass for qualified San Francisco residents on a limited income. The pass is offered at a 50% discount off the standard adult monthly pass price.	x. Medi-cal or SNAP/EBT as a verification method x. Requires residential verification x. City and County wide	www.sfmta.com/sites/default/files/reports-and-documents/2019/09/lifeline_app_with_benefit_cards_hsa_09192019.pdf	
LIFE (Low Income Fare is Easy)	LA Metro	x. Income needs to fall under the $44,150 or less for a single-family household x. Applicants must be 18 years or older. X. there is an option to self certify income if an applicant does not have access to proof of income documents.	x. Regional Program x. Fosters a large number of agencies x. Self- verification option x. Extensive list of income verification options from CalFresh to bank state	https://www.metro.net/riding/fares/life/#frequently-asked-questions	S3 - Open Self-Verification
ORCA LIFT	King County	x. Gross household income (before taxes are taken out) must be no more than 200 percent of the Federal Poverty Level x. Those receiving Apple Health Medicaid, WIC, and Basic Food are also eligible for the program	x. Works with Human Services Agency for eligibility process x. Includes a number of transit agencies	https://kingcounty.gov/en/dept/metro/fares-and-payment/discounted-fares/orca-lift#:~:text=Apply%20for%20a%20card&text=Apply%20over%20the%20phone%20by,our%20region%20at%20no%20cost.	A1 - County Partnerships
101 Express Lanes - Community Transportation Benefits Program	San Mateo County	x. A resident of San Mateo County x. Age 18 or older x. Earning an Individual Income at or below $78,300 for 2022 (60% of area median income). x. Automatically eligible if qualified for at least one benefit provided through San mateo County Core Service Agencies Network.	x. Self- verification x. great CBO example x. Low administrative burden	https://101expresslanes.org/faqs	S2 - CBO Peer Verification, S3 - Open Self-Verification
Hong Kong Senior Citizen Concessionary Transport Scheme	Hong Kong Government Transport Department	x. Age 60 and above. X. Permanent resident of Hong Kong.	x. example of an honor system that transitioned to a verification based system x. urban example with a plethora of rail and bus options	https://www.td.gov.hk/en/gov_public_transport_fare_concession/index.html	S3 - Open Self-Verification