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**TESTIMONY ON PROPOSED RIPTA BUS PASS PROGRAM POLICY FOR
SENIORS AND INDIVIDUALS WITH DISABILITIES
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The RI ACLU has a number of concerns regarding this proposal's requirement of photo identification from seniors and disabled patrons seeking reduced-fare bus passes. Photo identification is not readily available for all, and seniors and disabled individuals are among those least likely to have access to photo identification or the documents required to obtain it; as such, this requirement is inappropriate and runs contrary to RIPTA's own bus pass policy. Similarly, the new language regarding certification of disability is vague and provides no methods for review. As a result, many Rhode Islanders may be left without appropriate access to transportation.

RIPTA's own policy states: "All persons age 65 and over are eligible for the RIPTA Bus Pass Program for Seniors. All persons with qualifying disabilities are eligible for the RIPTA Bus Pass Program for Individuals with Disabilities." The only necessary and appropriate requirement for an individual to obtain this Bus Pass is therefore documentation of age or of disability status.

By requiring photo identification, RIPTA's policy will leave many senior and disabled individuals with no form of transportation. Survey results from the Brennan Center for Justice have estimated that as many as eighteen percent of American citizens over the age of 65 do not possess *any* form of photo identification. See: http://www.brennancenter.org/page/-/d/download_file_39242.pdf. A large percentage of Rhode Island's seniors, then, could be left without access to transportation as a result of this policy.

Obtaining a RIPTA bus pass thus becomes an arduous process for seniors. Where they once only had to provide proof of their age, seniors will now be required to possess citizenship and other documents necessary to obtain a state or federal identification, to pay to obtain a photo ID, to take time off from work and other responsibilities, and to secure transportation – *which RIPTA's own policy now limits for them* – to get to a DMV office to obtain this identification, all for a half-fare on a RIPTA bus. A half-fare bus pass now becomes a considerable burden, both financial and otherwise. For many, this policy may mean the end of their access to transportation altogether; the Brennan Center notes that up to seven percent of adult citizens lack *any* of the documentation required for obtaining a photo identification, and this is more likely among low-income individuals. Those individuals most in need of discounted bus fares will therefore be those most likely to lose access to RIPTA's bus pass program entirely.

Disabled individuals are also among those least likely to have photo identification, thus facing a similar unreasonable burden to obtain a bus pass. In addition, they must contend with the proposed policy's vague and confusing requirements for disability certification. While a list of "acceptable methods of certification" is promised by the proposed policy, no such list currently exists. As such, there is no opportunity for the disabled community to review the methods and comment on the practicality, comments which are clearly necessary in light of the unforeseen problems with a photo ID requirement. Without an open conversation about the methods of certification, we cannot know who, if anyone will be excluded by the disability certification requirements and lose their access to transportation.

The RI ACLU respectfully requests that the photo ID requirement be stricken from RIPTA's bus pass policy, and that a thorough list of acceptable methods of certification be provided to the public for review. If the suggestions we have made are not adopted, we request

that, pursuant to R.I.G.L. §42-35-3(a)(2), you provide us with a statement of the principal reasons for and against adoption of these rules, incorporating therein your reasons for overruling the suggestions urged by us. Thank you for your time and attention to our views.

Submitted by: Hillary Davis, Policy Associate