

Oregon Toll Program

Low-Income Toll Report:

Options to Develop a Low-Income Toll Program and Best Practices for Implementation

A Report to the Oregon Legislature

September 2022



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Acronyms and Abbreviations

ALICE	Asset Limited, Income Constrained, Employed
AMI	Area median income
BIPOC	Black, indigenous, and people of color
DMV	Oregon Driver and Motor Vehicle Services
EBT	Electronic Debit Transfer
EMAC	Equity and Mobility Advisory Committee
FPL	Federal poverty level
HB	House Bill
HUD	U.S. Department of Housing and Urban Development
I-	Interstate
Integrated ONE	Integrated Oregon Eligibility Program
LIFE	LA Metro Low-Income Fare is Easy
MSA	Metropolitan statistical area
NEPA	National Environmental Policy Act
OAR	Oregon Administrative Rules
ODOT	Oregon Department of Transportation
OHP	Oregon Highway Plan
ORS	Oregon Revised Statute
OTC	Oregon Transportation Commission
report	Low-Income Toll Report
SFCTA	San Francisco County Transportation Authority
SNAP	Supplemental Nutrition Assistance Program
SSS	Self-Sufficiency Standard for Oregon
STRAC	Statewide Toll Rule Advisory Committee
TANF	Temporary Assistance for Needy Families
TIMMA	Treasure Island Mobility Management Agency
TriMet	Tri-County Metropolitan Transportation District of Oregon
VDOT	Virginia Department of Transportation
VOT	Value of time
WSDOT	Washington State Department of Transportation

Executive Summary

The Low-Income Toll Report (“report”) for the Oregon Toll Program was developed by the Oregon Department of Transportation (ODOT) at the direction of the Oregon Legislature.¹ The Equity and Mobility Advisory Committee (EMAC) helped inform this report. House Bill (HB) 2017 provided direction to implement tolling on I-5 and I-205 in the Portland metro area, and ODOT’s Toll Program was established to oversee state-operated toll projects and policies throughout the state. Currently, the Toll Program is planning to administer three state-operated toll projects: the I-205 Toll Project, the Regional Mobility Pricing Project, and the Interstate Bridge Replacement Program. The latter project is being developed in partnership with the Washington State Department of Transportation (WSDOT).

¹“Enrolled House Bill 3055,” Sec 162, State of Oregon, 2021. <https://olis.oregonlegislature.gov/liz/2021R1/Downloads/MeasureDocument/HB3055/Enrolled>

As directed by the Oregon Legislature, this report presents an approach for developing a low-income toll program as part of the Oregon Toll Program. It presents “options for consideration,” which detail specific options on the income threshold for a low-income toll rate, in addition to options for the type of benefit (e.g., discounts, credits, a number of free trips). It also describes proposed “implementation practices,” which include best practices for implementation of an equitable, inclusive toll system. Based on engagement with stakeholders, research, and technical analysis, this report considers the benefits to people experiencing low-incomes, program costs, and trade-offs of different options. The report also outlines next steps to determine how the low-income toll program will function. Additional work to develop and operationalize the low-income toll program includes defining program components, creating an operations plan that includes staffing, and aligning the low-income toll program with overall Toll Program development. As part of Toll Program development, ODOT has committed to providing a low-income toll program the first day tolling begins, which is planned for the end of 2024 as part of the I-205 Toll Project.

This report is the result of the work of ODOT, the OTC, and community and project partners over multiple years to address the impacts of the planned toll projects on people experiencing low incomes. In combination with the Oregon Highway Plan (OHP) amendment and coordination and collaboration with EMAC, this report is part of a larger effort to initiate tolling in a way that attempts to move beyond avoiding burdens, and to shift to a system of more equitable payment for transportation. The report also recognizes that past land use and transportation investments in the Portland metro area—including highway investments—have resulted in negative cultural, economic, and relational impacts on local communities and populations.



Options for Consideration

Provide a significant toll discount (i.e., credits, free trips, percentage discount, tax credit, or full exemption) for households with incomes equal to or below 200% of the federal poverty level.

People experiencing low incomes face difficult daily choices for meeting basic needs (e.g., paying for food, transportation, shelter, clothing, or healthcare). A sizable toll discount would help alleviate the burden of choosing between paying a toll and meeting those basic needs. This option received strong support from EMAC and through public feedback. Research shows that 200% of the federal poverty level is commonly used to determine eligibility for existing low-income benefits programs in Oregon and nationally.

Provide a smaller, more focused toll discount (i.e., credits, free trips, percentage discount, tax credit, or full exemption) for households with incomes above 200% and up to 400% of the federal poverty level.

Households with incomes just above 200% of the federal poverty level may still struggle to meet basic needs. Providing a more focused discount would help alleviate the burden of toll expenses. People in this income bracket may experience income that fluctuates throughout the year or varies year to year; therefore, this benefit would offer some reassurance of continued benefits despite that fluctuation. National best practice supports avoiding eligibility restrictions where small differences in income drastically change the level of benefit.

Respondents from a spring 2022 survey supported providing a benefit above 200% of the federal poverty level.² In addition, EMAC and project partners expressed support for benefits for participants with household incomes above 200% and up to 400% of the federal poverty level. EMAC agreed that including two income ranges to meet different needs is worth the additional complexity for program implementation.

²The survey was developed prior to case study research and regional economic analysis that informed income threshold considerations. While survey respondents were asked about 300% of the federal poverty level (see Table 3-1), the upper income limit was revised to 400% of the federal poverty level to reflect additional research findings regarding cost of living.

Use a verification process that leverages existing programs and further explore self-certification to qualify for program enrollment (or toll discounts).

Qualification through existing low-income service programs or self-certification improves the ease of enrollment for applicants and can reduce ODOT's enrollment administrative cost burden and data privacy risk. For example, partnering with the Integrated Oregon Eligibility Program (Integrated ONE) may alleviate some enrollment administrative burdens of partnering with numerous programs while providing comprehensive coverage of existing programs. Additional work is needed to understand the potential risk and impact of program fraud related to self-certification, and the efficacy and trade-offs of fraud prevention strategies. EMAC and community partners strongly support a self-certification model that streamlines the low-income toll program enrollment process.



Next Steps and Implementation Practices

ODOT, in collaboration with the OTC and community partners, has additional work to do to identify specific benefits for people experiencing low incomes and to operationalize the low-income toll program to ensure the benefits are in place before tolling begins. The low-income toll program will be built out through a variety of program milestones. Ultimately, decision-making authority on the income-based adjustments lies with the OTC and will occur through the rate-setting process after further robust public engagement and analysis of traffic and revenue impacts. This section provides an overview of next steps for development of the low-income toll program and provides considerations for implementing the program

2.1 Next Steps

The following list identifies key Toll Program milestones and explains how they will inform development of the low-income toll program.

Income thresholds and discount options will be further analyzed and discussed as part of the toll projects.

- ✔ The toll projects will further analyze discount and income threshold options in the traffic and revenue studies to help understand how the low-income benefits change the base traffic and revenue forecasts. These analyses will incorporate additional data and assumptions related to demographics, enrollment, travel frequency, and revenue leakage. The findings from the traffic and revenue studies, in combination with engagement and additional research, will help inform the income threshold and type of benefit that is advanced for implementation.
- ⌚ **Timing:** The traffic and revenue studies involve three levels of analysis with increasing rigor, time and costs. The Final Traffic and Revenue Study is expected to be available in 2024 for the I-205 Toll Project and in 2025 for the Regional Mobility Pricing Project.



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EMAC Foundational Statement: To the greatest degree possible, investments that are necessary to advance equity must be delivered at the same time as highway investments and be in place on day one of tolling or before.

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The OTC will establish the income thresholds and discount type(s) for the low-income toll program, as well as the rules for enrollment, verification, interoperability, and enforcement through the rulemaking and rate-setting process.

- ✔ The Statewide Toll Rule Advisory Committee (STRAC) will review changes to Oregon Administrative Rules (“rules”) and provide feedback to ODOT on the process to set toll rates. This process will be informed by traffic and revenue studies, which will incorporate assumptions for the low-income toll program and identify the potential impacts on congestion management and revenue generation. The practices for implementation presented in this report will inform the rules for enrollment, verification, interoperability, and enforcement.
- 🕒 **Timing:** The STRAC will be established in late 2022 and will develop recommendations through the end of 2023. The OTC will adopt toll rates and rules in 2024 for the I-205 Toll Project.

Development of the back-office system and operations management will inform the administration cost, viability, and timing of the discount and/or credit and implementation practices.

- ✔ The back-office system can be designed to operationalize the discount type and income thresholds that are selected, in addition to enrollment and verification rules. As ODOT, EMAC, and community partners discuss discount types, operations management specialists will continue to provide guidance on administrative costs. The goal is to avoid benefits that are more costly to operationalize than the benefit received by the customer. Once the program is established, a public outreach campaign, focused on reducing barriers to enrollment, will begin to inform potentially eligible customers.
- 🕒 **Timing:** The back-office system configuration will occur in parallel with the STRAC process, which will occur from fall 2022 to the end of 2023.



EMAC will continue its role in advising the OTC and ODOT on how to operationalize the low-income toll program and support enrollment.

- ✔ EMAC will continue to review and provide feedback to ODOT and the OTC as more information becomes available through the two toll projects and the rate-setting process. EMAC will also work with ODOT in preparing to implement the low-income toll program to help ensure people with the greatest need have access to the program. Once the low-income toll program is established and enrollment can begin, ODOT, in coordination with community partners, will connect with and enroll customers. EMAC recommends the low-income toll program should be in place on day one of tolling or before.
- 🕒 **Timing:** EMAC will continue meeting and providing feedback to ODOT and the OTC from fall 2022 through at least 2023.

ODOT will continue to monitor statewide policy, including the OHP amendment, to ensure it supports the low-income toll program.

- ✔ The purpose of the OHP amendment is to provide clarity around pricing and tolling to recognize new opportunities and support potential implementation, among other policy updates.
- 🕒 **Timing:** ODOT anticipates that the OTC will adopt the OHP amendment in late fall 2022 to inform the rulemaking and rate setting process.

In partnership with program participants and community-based organizations, ODOT will monitor, review, and adjust the low-income toll program after tolling begins to ensure it is meeting equity and project goals.

- ✔ After the low-income toll program is implemented, program performance will be reviewed through ongoing traffic and revenue monitoring, engagement with eligible program participants, and partnerships with community-based organizations. Programmatic review may include adjusting the program if it does not adequately meet equity and project goals, improving customer service, and/or identifying opportunities to increase enrollment. Experience from Virginia's program shows that a steering committee or equity panel for programmatic review can help people experiencing low incomes continue to shape the program. Additionally, in July 2022 OTC accepted EMAC's recommended actions, which included continued support for a toll equity accountability committee (or another structure) that provides a forum for equity voices to monitor, evaluate, and provide feedback on enrollment in and economic impacts of the low-income toll program over time.
- 🕒 **Timing:** Monitoring would begin in coordination with the start of tolling, which is planned for 2024 for the I-205 Toll Project and 2025 for the Regional Mobility Pricing Project.



2.2 Implementation Practices

ODOT's review of national research on low-income toll programs and discussions with EMAC and community partners yielded two key findings and informed the list of implementation practices:

- Low-income toll programs are drastically under-enrolled.
- Benefits must be substantial enough to meet the needs of people experiencing low incomes.

Based on EMAC's recommendations and the analysis of practices to promote inclusion, accessibility, and enrollment, the following practices outline key considerations for developing the system to support the low-income toll program:

- ✔ Provide free transponders and work with community-based organizations to help enroll people.
- ✔ Do not require a minimum dollar amount of balance to load or maintain the transponder account.
- ✔ Provide a cash-based option for toll payment.
- ✔ Conduct extensive marketing, promotion, and engagement with community-based organizations that begins at least 6 months before tolling starts. Post signage to help travelers make informed decisions.
- ✔ Create an in-person and online enrollment process that accommodates participants with disabilities, who have limited technology access or training, who speak languages other than English, and who live far away from existing service centers.
- ✔ Support a monitoring, review, and adjustment process for the low-income toll program that includes community voices and a process that is aligned with the Oregon Toll Program's Equity Framework.
- ✔ Offer education opportunities, additional time to pay toll charges, and multiple notices of account balances, and/or set a maximum penalty amount.
- ✔ Consider equity implications in the development of a concept of operations that includes the process for penalties that users are subject to for toll violations (i.e., initial penalty followed by a failure to comply penalty).
- ✔ Further work is needed to identify the administration cost and operational viability for each of these practices. This information is necessary to guide the selection of options that advance equity and are cost effective.



Chapter 1: Introduction

This chapter introduces the purpose, legislative directive, and context for the report, in addition to previous work on addressing concerns about tolling related to people experiencing low incomes and the significant challenges and considerations for a low-income toll program. It also includes the engagement and decision-making for the program and the next steps for implementation.

1.1 Purpose

This report provides options for consideration and planned elements for the implementation of equitable, income-based tolls in Oregon. Tolling is planned to begin at the end of 2024 as part of the I-205 Toll Project.

This report is a culmination of multiple years of work by ODOT, the OTC, and community and project partners to address the impacts of the proposed toll projects on people experiencing low incomes. The report summarizes the engagement, analysis, and research conducted thus far to inform the options for consideration and implementation practices. Focused engagement with the OTC, stakeholders, and the public occurred throughout summer 2022 to inform and refine the options for consideration and implementation practices presented in the final report.

1.2 Background

The following sections provide background on the legislative requirements directing this report, ODOT's Urban Mobility Strategy, and related work efforts leading up to the final report.

1.2.1 Legislative Requirements (HB 3055)

In 2021, the Oregon Legislature passed [HB 3055](#), which requires ODOT to “implement a method for establishing equitable income-based toll rates” before tolling begins. The first toll project for the Oregon Toll Program is planned to begin tolling at the end of 2024. HB 3055 also requires that ODOT produce a report on the method for establishing equitable income-based toll rates before September 15, 2022. The legislative direction for the report is as follows:

REPORT ON EQUITABLE INCOME-BASED TOLL RATES

SECTION 162. (1) As used in this section, “toll” and “tollway” have the meanings given those terms in ORS [Oregon Revised Statute] 383.003.

(2) Before the Department of Transportation assesses a toll, the department shall implement a method for establishing equitable income-based toll rates to be paid by users of tollways.

(3) At least 90 days before the date the Oregon Transportation Commission seeks approval from the Federal Highway Administration to use the income-based toll rates developed under subsection (1) of this section, the department shall prepare and submit a report on the method developed to the Joint Committee on Transportation and the Oregon Transportation Commission. The department may also submit to the Joint Committee on Transportation any recommended legislative changes. The report shall be provided to the Joint Committee on Transportation, in the manner provided under ORS 192.245, on or before September 15, 2022.

SECTION 163. Section 162 of this 2021 Act is repealed on January 2, 2023.

”

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In 2021, the Oregon Legislature passed HB 3055, which requires ODOT to “implement a method for establishing equitable income-based toll rates” before tolling begins.

.....

1.2.2 ODOT's Urban Mobility Strategy

ODOT's [Urban Mobility Strategy](#) aims to improve everyday travel in the Portland area through a cohesive set of projects and investments, shown in Figure 2-1. The Urban Mobility Strategy is led by the Urban Mobility Office and primarily functions to manage traffic congestion with tolling, reduce highway bottlenecks through capital construction, and invest in multimodal transportation in ways that serve ODOT's goals of addressing equity, climate change, congestion relief, and safety.

Current core projects include I-5 Rose Quarter Improvement, I-205 Improvements Project, I-205 Toll Project, Regional Mobility Pricing Project, I-5 Boone Bridge and Seismic Improvement Project, Oregon 217 Auxiliary Lanes Project, Interstate Bridge Replacement Program, and investments in transit and in rolling and pedestrian paths, all of which will contribute to building a seismically resilient and modern transportation system. As a part of these core projects, tolling will be central to ODOT's long-term strategy to manage congestion and sustainably raise revenue for roadway and multimodal investments in the Portland metro area.

Oregon Toll Program

The Oregon Toll Program currently includes two projects: the I-205 Toll Project and the Regional Mobility Pricing Project.



- [The I-205 Toll Project](#) would toll Interstate 205 (I-205) near the Abernethy and Tualatin River Bridges to raise revenue for construction of the planned I-205 Improvements Project and manage congestion between Stafford Road and Oregon Route 213 to give travelers a better and more reliable trip.
- [The Regional Mobility Pricing Project](#) would apply congestion pricing³ on all lanes of I-5 and I-205 in the Portland metro area to manage traffic congestion in a manner that will generate revenue for future transportation investments. The project area begins just south of the Columbia River and ends before the Boone Bridge over the Willamette River in Wilsonville.

³ "Congestion pricing," or variable-rate tolling, describes a type of tolling that aims to improve mobility, travel times, and reliability by charging a higher price during peak traffic periods. The higher fee—typically implemented along with transit and other multimodal improvements—encourages some drivers to consider using other travel options, such as carpools or transit, or to change their travel time to other, less-congested times of the day, or not to make the trip at all.




While there are currently only three planned toll projects in Oregon, this report seeks to establish a broad framework that is flexible to adapt to future projects statewide yet effective and precise enough move beyond avoiding burdens and shift to a system of more equitable payment for transportation when tolling begins in the Portland metro area.

Figure 1-1. Urban Mobility Strategy Projects Map






Currently Funded by HB2017

-  System Improvement Project
-  Bike/Ped Crossing Project

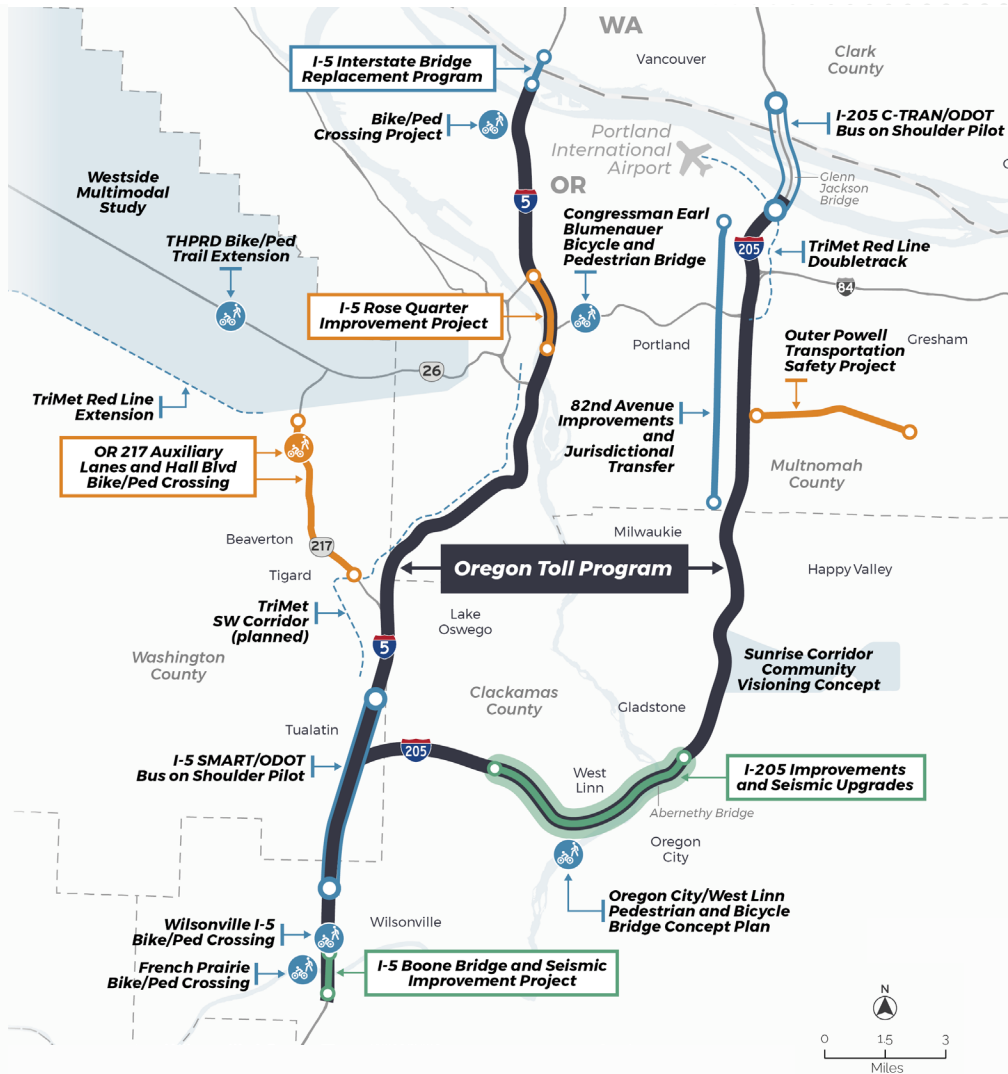
Made Possible with HB3055

-  System Improvement Project
-  Regional Mobility Pricing Project
-  I-205 Toll Project

Partner Project with ODOT Support

-  System Improvement Project
-  Bike/Ped Crossing Project
-  Bus on Shoulder Pilot
-  TriMet Project
-  Multimodal/Community Study

Note: Core project names are boxed



1.2.3 Previous Work on Low-Income Tolls

ODOT and the OTC began working on how toll projects should mitigate impacts on people experiencing low incomes in 2017. Highlights of this work include the following:

- From 2017 to 2018, ODOT and the OTC convened a Policy Advisory Committee to provide input on the [Value Pricing Feasibility Analysis](#). The Policy and Advisory Committee reviewed existing research and identified the need to address cost impacts on people experiencing low incomes as a priority strategy.
- In 2020, the OTC [chartered](#) the Equity and Mobility Advisory Committee (EMAC) to provide recommendations on transportation needs of and benefits for people of color and people experiencing low incomes, with limited English proficiency, or experiencing a disability who live near or travel through the project area.
- From 2020 to 2021, with support from ODOT and the OTC, EMAC conducted research on case studies of other toll programs to inform a set of performance measures for ODOT to incorporate into both toll project analysis and an initial list of policy options.
- In late 2021, EMAC, ODOT, and the OTC agreed on a set of Foundational Statements to address equity and mobility needs for the Oregon Toll Program, which include providing transportation options, addressing both climate and equity needs, offering toll-free travel options, creating a user-friendly program that is in place once tolling begins, ensuring that benefits extend to southwest Washington, and coordinating with regional partners. The Foundational Statements serve as one building block for the options outlined in this report.
- ODOT, the Joint Policy Advisory Committee on Transportation, and Metro Council have committed to supporting a list of “Commitments for ODOT and Regional Partners” (Ordinance 21-1467) and a Letter of Agreement (dated April 25, 2022) to center equity in their process and outcomes.
- In July 2022, EMAC submitted recommendations to the OTC, which included actions that build from and connect to the Foundational Statements. The OTC accepted EMAC’s recommended actions, providing strategic direction to ODOT to center equity using these actions as the basis for future decisions.
- This report is also informed by ODOT’s work in equity through the Office of Social Equity and direction identified in the [Strategic Action Plan](#).



1.3 Report Development and Engagement

To develop this report, ODOT partnered with EMAC and engaged with the Washington State Department of Transportation (ODOT's partner on the Interstate Bridge Replacement Program), social service agencies, transit and multimodal transportation providers, and statewide, local, and regional stakeholders. ODOT also sought community input through discussion groups and an online survey. Chapter 4 details the findings of this effort and the list of stakeholders and organizations ODOT engaged with. The Regional Mobility Pricing Project Spring 2022 Engagement Report will include a full engagement summary, including feedback received.

1.3.1 Engagement and Decision-Making

Because tolling I-5 and I-205 in the Portland region has statewide impacts (and beyond), ODOT strived to reach as many people as possible. The team conducted an online survey that received over 12,000 responses, seven interviews with representatives from social survey providers, one discussion group with community-based organizations and nine discussion groups with historically excluded and underserved community members. To capture the robust engagement, ODOT developed a three-step iterative process to develop and finalize the report (**Figure 1-2**).



Figure 1-2. Three-Step Process for the Low-Income Toll Report



Guiding Questions

The following questions were developed in coordination with EMAC and project partners to ensure that this report addresses the key questions ODOT has been hearing from the community:

- At what level of income should ODOT provide a price discount from tolling?
- Should the discount be a partial credit, full exemption, somewhere in between, or a combination?
- How can ODOT provide toll-free travel options to avoid further burdening people experiencing low incomes who are struggling to meet basic needs (food, shelter, clothing, healthcare)?
- Research shows that income-based toll programs are drastically under-enrolled. What are the barriers to enrollment (privacy, access, lack of information, etc.) and how can they be addressed?
- How can Oregon's tolling be a user-friendly system that is clear and easy to use by people of all backgrounds and abilities, including linguistic diversity, and by those without internet access?
- How can benefits extend across state lines?
- This will be a new program for ODOT. What are issues that need to be addressed for administration and implementation on day one of tolling?
- How will the low-income toll program be monitored and adjusted so that it provides easy access and a low barrier for the customers experiencing low-income it was intended to benefit?



1.4 Key Terms and Concepts

Table 1-1. Definitions of Key Terms and Concepts

Key Term	Definition*
Account holder	The individual who is financially responsible for paying the toll costs incurred during travel in the tolled area.
Administrative costs	Expenses incurred to support low-income toll program operations.
Enrollment	An individual is considered “enrolled” in the program when they have a transponder account and can utilize benefits of the low-income toll program. The enrollment process may include income verification (see definition).
Eligibility	Qualification for participation in the low-income toll program, as determined by the account holder’s yearly household income.
Exemption	Free from an obligation to pay any toll costs.
Free trip(s)	A set number of free trips are applied to a transponder account on a recurring basis (e.g., 10 free trips in the tolled area per month).
Income verification	The process to determine that an applicant’s household income is within the eligible income range. This report discusses the following methods for verifying income: proof of income (such as a paystubs), enrollment in another approved low-income benefit program (such as the Supplemental Nutrition Assistance Program [SNAP]), or self-certification (see definition).
Income threshold	Eligible household income for program participation (e.g., Households with comes below the federal poverty level).
Self-certification	The practice of an account holder officially declaring (by submitting a self-attestation form) their household income complies with the low-income program income threshold without needing to provide additional evidence. Self-certification of income sometimes requires applicants to agree to possible periodic auditing.
Toll credit	A credit applied to a transponder account on a recurring basis (e.g., a \$25 toll credit applied to the transponder account every 6 months).
Toll discount	A reduction applied to the assessed toll for each trip (e.g., 50% discount on a \$3 toll would result in the driver paying \$1.50). A toll discount is applied as the trip is charged, so the driver would pay the discounted price.
Transaction costs	The cost incurred by the toll operator to process the toll fee and low-income benefit, if applicable.

*The examples provided in this list of definitions are illustrative and not determined program features.

Chapter 2: Equity and Mobility Advisory Committee

This chapter includes an overview of Equity and Mobility Advisory Committee (EMAC) and its role in developing the low-income toll program, including its Foundational Statements that guide the Oregon Department of Transportation's (ODOT) work to ensure equitable mobility in the toll projects. It summarizes EMAC's recommendations on three topics: analysis of the toll projects, the low-income toll program, and operating the overall Toll Program. All of these recommendations are designed to center equity in the Oregon Toll Program.

To ensure equitable Regional Mobility Pricing Project and I-205 Toll Project processes, and to help develop an equity framework, the OTC convened the Equity and Mobility Advisory Committee. This committee is a group of individuals with professional or lived experience in equity and mobility coming together to advise the Oregon Transportation Commission and ODOT on how tolls on the I-205 and I-5 freeways, in combination with other demand management strategies, can include benefits for populations that have been historically and are currently underrepresented or underserved by transportation projects. Among EMAC's tasks was the development of strategies to address the transportation needs of, and benefits for, people of color, people experiencing low incomes, people with limited English proficiency, and people experiencing a disability who live near or travel through the project area.

EMAC's initial work resulted in the adoption of an Equity Framework to identify the burdens and benefits of tolling and provide a process for determining how to equitably distribute those burdens and benefits from the toll projects. The Equity Framework acknowledges how past land-use and transportation investments in the Portland metro area have resulted in negative cultural, health, economic, and relational impacts on the following local communities and populations:

- People experiencing low-income or economic disadvantage
- Black, indigenous, and people of color (BIPOC)
- Older adults and children
- Persons who speak languages other than English, especially those with limited English proficiency
- Persons experiencing a disability
- Other populations and communities historically excluded and underserved by transportation projects



2.1 Informing the Low-Income Toll Program

EMAC reviewed research about toll projects and low-income programs to inform development of the options for consideration. Elements of these other programs that were considered by EMAC included eligibility standards, discount or credit allocations, and geographic distribution of benefit. The resulting input and the EMAC Foundational Statements provided the basis for the options for consideration and implementation practices outlined in this report (see Appendix A).

ODOT began to develop this report while the EMAC recommendations were in draft form and has refined the report to reflect the final EMAC recommendations delivered to the Oregon Transportation Commissioner in July 2022. EMAC members have also provided feedback on online survey questions, participated in discussion groups, provided input to confirm the report topic areas and questions, shared reactions to preliminary findings, and expressed support for the report options for consideration. The following sections outline the way EMAC gathered information to make decisions and the nature of its guidance for developing options for the low-income toll program, describe the feedback provided by an EMAC subcommittee convened to review a draft of this report, and summarize key EMAC feedback on the draft of this report.

2.2 EMAC Advice and Feedback

Throughout 2021, ODOT supported EMAC with research documents that included a literature review, examples of toll projects throughout the United States, and feedback received from the community about how toll projects have address affordability. The following list provides links to these resources:

- [Affordability Research](#)
- [Affordability Policy and Strategy Options \(1st Round\)](#)
- [Affordability Performance Measures](#)
- [Affordability Workshop \(Video\)](#)



EMAC identified robust ideas during discussions relating to toll project analysis, the low-income toll program, and Oregon Toll Program. The following EMAC input is directly applicable to this report:

- Look beyond the standard federal definition of “low-income.” For the toll projects’ federal environmental review process (i.e., National Environmental Policy Act [NEPA]), a measure of 200% of the federal definition for poverty was assumed. This should be the baseline for future consideration. The reality is that people move below and above the federal definition for poverty in a short span of time.
- Implement an income-based toll program that is progressive in nature, meaning that higher-income drivers will pay a larger share or percentage of household income than lower-income drivers.
- In addition to drivers who are people experiencing low incomes, provide toll payment credits, exemptions, or discounts for:
 - » Public transit vehicles and registered vanpools and carpools
 - » Public emergency response vehicles and non-emergency medical transportation
 - » Social service or nonprofit health organizations to recruit and retain volunteer drivers
- Find the right balance between discounts and/or exemptions and revenue generation to advance equity. Specifically, analyze the trade-offs between exemptions, credits, or discounted rates based on income versus collecting the toll revenues and investing them into equity and mobility strategies. This may include an analysis of trade-offs in the time between when I-205 tolling starts and when the regional I-5 and I-205 toll system (i.e., Regional Mobility Pricing Project) comes online.

- Equity Framework-identified communities should be involved in the analysis and decision-making process on determining what would best advance equity.
- Design and implement an interoperable and easy-to-use fare/payment system across geographic boundaries and transportation options.
- Coordinate between Oregon and Washington, as well as across bike, scooter, carpooling, car sharing options, and park-and-ride lots. Look at Rideshare Online as an example of rideshare and vanpool services that serve Oregon and Washington. Likewise, TriMet's Hop card is an example of a system that accommodates users in Oregon and Washington.
- Commit to offering additional time to pay a toll bill without incurring fines, and study options for effectively doing so. Tolling should not contribute to more financial indebtedness for people experiencing low incomes, nor should it lead to criminal penalties.
- Follow the precedent set by ODOT's Rose Quarter Improvement Project to include a baseline for Disadvantaged Business Enterprise investment that goes beyond the federal requirement.
- Provide a cash-based option for paying tolls in order to reduce payment barriers, including among the unbanked.
- Ensure the process of applying for exemptions, discounted rates, or credits considers varying degrees of technological competency and access. ODOT should account for internet reliability in rural areas and how that could affect access to services online (e.g., loading transponders, applying for exemptions, etc.).
- Set a zero or low minimum-balance requirement for loading or maintaining transponders. Transponders should also be free or should come pre-loaded with credits to cover the cost of the purchase. The cost of a transponder can be a barrier to purchase for people experiencing low incomes.

2.3 EMAC Feedback on Draft Report Development

A subcommittee of EMAC members reviewed information on the technical analysis and the results of public engagement related to a low-income toll policy. The members provided input and feedback on a draft of this report at two subcommittee meetings in April and May of 2022. Feedback on draft options for consideration included the following:

- Support for a sizable benefit at 200% of the federal poverty level and a smaller benefit above 200% and up to 400% of federal poverty level.
- Agreement that including two income eligibility levels is worth the additional complexity so that different needs can be met.
- Varied support for offering a free option. Supportive members referenced the current and historic regressive transportation funding structure as well as the extreme economic needs at the lowest of incomes. Opposing members raised concerns about the climate impacts of incentivizing driving and de-incentivizing transit, the history of free social service benefit programs, and a feeling that all users should contribute some amount.
- Strong support for a self-certification model that streamlines the low-income toll program benefit enrollment process.

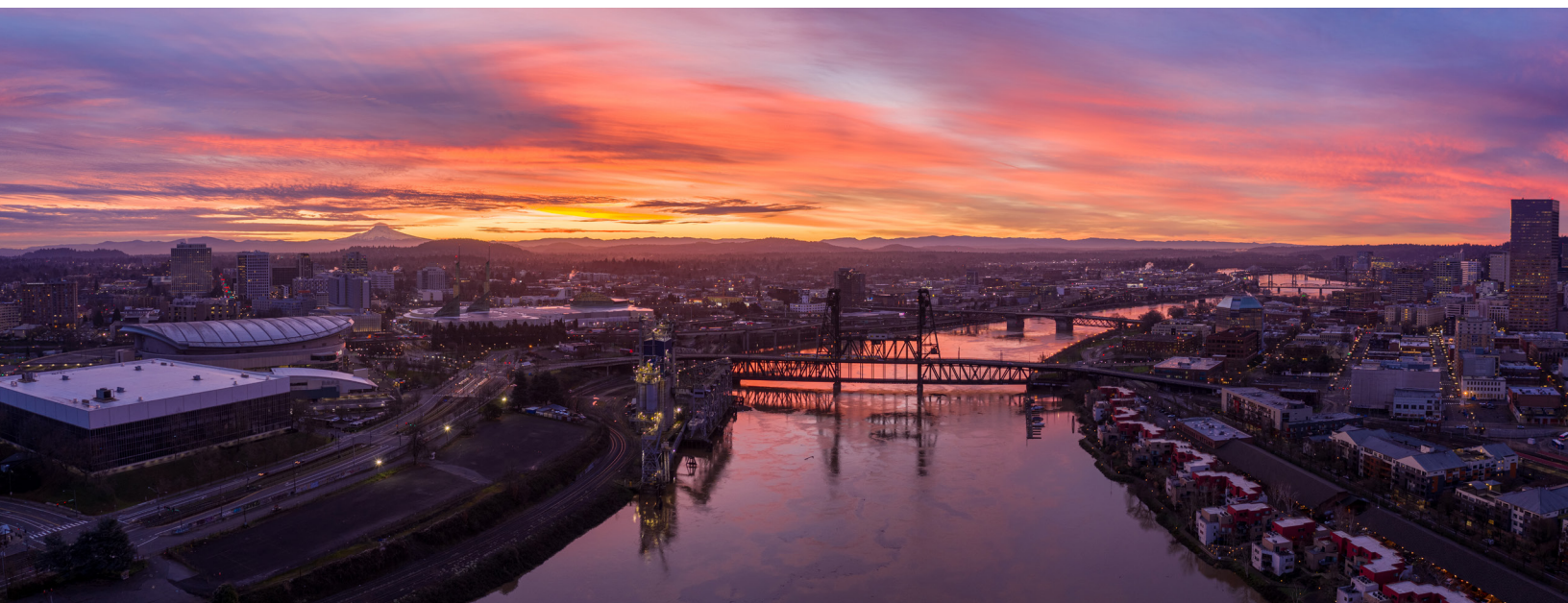
EMAC developed and delivered a set of recommendations to the Oregon Transportation Commission in July 2022. The Oregon Transportation Commission accepted EMAC's recommendation actions pertaining to affordability, which are reflected in this report.



2.4 EMAC Feedback on the Draft Report

Following the release of the draft report for public comment, a subcommittee of EMAC members provided feedback in July 2022. Their feedback included general report comments and specific questions not covered in the draft report. Key comment themes included the following:

- Strong support for self-certification. Supportive members agreed that fears of fraud are overstated and programmatic emphasis should be on accessibility, not punitive enforcement.
- Concern about access to transponders. Members suggested multiple distribution channels including pickup at local retail locations and dispensing through local community-based organizations.
- Agreement that 400% of the federal poverty level is an appropriate maximum income threshold. Members suggested communicating this threshold in yearly or hourly income to help the public recognize program benefits.
- Acknowledgment of the consequences and benefits with all discount options. Improvements can be made over time to find the right balance between transportation benefits and equity.



Chapter 3: Stakeholder Engagement Results

This chapter summarizes key themes from various engagement methods, including stakeholder interviews with low-income service providers, a public survey, and discussion groups with historically excluded and underserved groups. This feedback was central to developing the report's options for consideration.

The Oregon Department of Transportation (ODOT) engaged stakeholders through a variety of methods and with numerous audiences. The stakeholder engagement activities and key themes from each activity are summarized in the following sections.

3.1 Stakeholder Interviews and Discussion Groups

ODOT conducted seven interviews⁴ to gather information from social service providers and state, local, and federal programs that serve people experiencing low incomes. The purpose of the interviews was to help inform implementation practices for determining eligibility and designing an accessible, inclusive low-income toll program.

ODOT partnered with the Community Engagement Liaisons Program to conduct focused, meaningful engagement with historically excluded and underserved groups. Trusted leaders from various communities held eight discussion groups with individuals or groups who identify as a youth, people experiencing disabilities, Latin American, Russian/Slavic, Chinese, Vietnamese, Black/African American, and Black, indigenous, and people of color (BIPOC). Participants were asked for their perspectives on options for the low-income toll program, preferences on enrollment and application process, and potential barriers to participating in the program.

ODOT also held a discussion group with eight representatives⁵ from seven community-based organizations serving Equity Framework communities. Participants were asked about potential barriers to participation in a low-income toll program and best practices for enrollment from other programs for people experiencing low incomes.



⁴Interview participants included representatives from Neighborhood House, Health Share of Oregon, Native American Youth and Family Center, TriMet, Portland Housing Bureau, Housing and Urban Development, and Oregon Housing and Community Services.

⁵Community-based organization discussion group participants included representatives from Black United Fund of Oregon, Community Alliance of Tenants, East County Rising, Immigrant and Refugee Community Organization, Oregon Latino Health Coalition, Ride Connection, and Portland Community Reinvestment Initiatives.

3.1.1 Key Themes

The following key themes emerged from stakeholder interviews and discussion groups:

- Address the many barriers that may exist for potential applicants to enroll for low-income benefits. Several participants noted significant barriers for these types of programs include language, technology access, lack of a bank account, time, effort, and complexity of the application. Many people reiterated the importance of simplicity and ease because the process of applying for these types of programs can be a substantial barrier unto itself.
- Provide many options to demonstrate eligibility for a low-income discount. Several people encouraged automatic enrollment through other programs such as the Supplemental Nutrition Assistance Program (SNAP) or self-certification.
- Make the application centralized and easy to complete and track. Application hubs such as the Online Enrollment System help to reduce the burden on applicants. Provide participants many ways to apply, pay for services, and connect with services.
- Offer many application options and in multiple languages. While many participants suggested a web form or app to apply, many others noted the importance of providing variety of options to accommodate the varying needs of potential applicants.
- Partner with low-income programs and other resources for the program to be successful. Participants highlighted the importance of working with community-based organizations and cross-marketing with similar programs to help spread the word to communities through trusted sources and to increase enrollment in low-income programs. Additionally, provide resources for staff and funding for community-based organizations and other trusted organizations such as schools and libraries to support enrollment.
- Concern about the definition of “low income.” In several groups, people mentioned the challenges of using typical income standards as a way to demonstrate eligibility because they do not account for many living costs, such as rent or ongoing medical expenses. Some people also noted that federal poverty guidelines may not be appropriate because Portland is more expensive than other parts of Oregon and the United States.



- ➔ Provide low-income discounts, but some concern was expressed about fairness. Some participants noted that people experiencing low incomes may use the tolled roadways less and so have less need for a discount than working families or people at other income levels who still have financial hardships. They said that all income levels should pay the same toll rate.
- ➔ Consider the unique transportation needs of other user groups such as seniors living on fixed incomes or people living with disabilities who depend on others for transportation or who have specific transportation needs, as well as immigrants experiencing language barriers or without documentation.
- ➔ Provide discount and credit options, but some concern was expressed about a transit credit. Participants commented that transit was not a realistic option for them due to availability of service or schedule considerations. Some stakeholders expressed concern that if people were already using transit, they would not be likely to drive on tolled facilities and therefore would be less likely to be affected by a toll.
- ➔ Consider more ideas for types of discounts and how toll discounts could work, such as offering a certain number of free trips per month instead of credits, an unlimited monthly pass, or income-tax credits for tolls.
- ➔ Conduct an awareness and education campaign. Several participants mentioned that it was important to make sure people know about the program. They noted many people do not have time or energy to seek these programs out, so an outreach and education campaign is important.
- ➔ Provide multiple options for toll payment, including paying with cash. Several participants noted that there are people experiencing low incomes who may use only cash on a regular basis and may not have bank accounts.
- ➔ Provide support for those who cannot make toll payments to avoid impacts from fines or penalties. Participants were concerned families experiencing low incomes may be charged with impactful penalties or fines if they missed receiving a toll bill by mail.

3.2 Online Survey

An online survey was publicly available from April 28 to May 16, 2022 and received over 12,000 responses. ODOT advertised⁶ the survey as an opportunity for the public to share feedback to shape congestion pricing and advance equity, including developing a toll discount or credit for people experiencing low incomes. The survey included two multiple-choice questions related to the Low-Income Toll Report, asking who should be eligible for the low-income discount or credit and the level of agreement with options for a low-income toll program.

In addition, an open-ended write-in question was provided at the end of the survey for respondents to share any additional feedback with decision-makers and project planners about congestion pricing. There were over 8,000 responses to this write-in question, and of those there were 146 comments and ideas related to the Low-Income Toll Report.

One of the goals of this engagement phase was to increase awareness of tolling in Oregon, garner broad participation, and engage with as many members of the public as possible. The survey was not designed to be statistically representative, meaning the respondent sample is not predictive of the opinions of the Portland metro area population as a whole. Participants were not chosen at random, but instead opted in to take the survey. Thus, as is common with self-selection surveys, it is likely that respondents held stronger opinions about tolling or could experience greater impacts from tolling when compared to the general population.

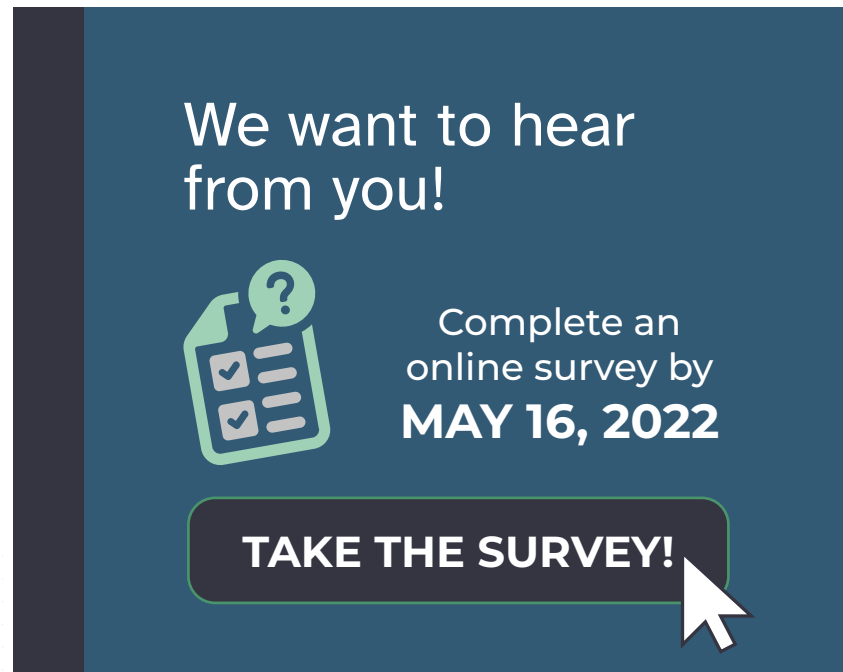


Image from an ad for the online survey that was publicly available from April 28 to May 16, 2022

⁶Activities to help invite participation in the online survey included: digital and print ads in regional and multicultural publications; social media posts, including ads in Spanish; website notices and newsletter updates; outreach toolkits to partners; tabling events at food pantries; and presentations at various transportation meetings in the Portland region and statewide.

3.2.1 Key Themes

ODOT tabulated survey results for all respondents and for respondents who reported household annual incomes under \$50,000. Key themes related to benefits and eligibility are shown in **Table 3-1**. Full results are included in the *Regional Mobility Pricing Project Spring 2022 Engagement Report*.

Survey respondents were asked who should be eligible for a low-income discount or credit. As shown in **Table 3-1**, many respondents (55%) preferred some type of eligibility threshold. The most common preference was an eligibility threshold of 300% of the federal poverty level (FPL) (36%), while 19% preferred an eligibility threshold of 200% FPL. Across nearly all demographics, there was significantly more preference for eligibility at 300% FPL. Several groups were more likely to choose one of the presented eligibility thresholds. Among those respondents who bike/roll, walk, take transit, and people with household incomes under \$50,000, approximately 70% opted to select one of the eligibility thresholds.

Table 3-1: Key Themes from Survey Respondents – Eligibility (N = 11,050)

Theme: Eligibility ^[1]	All Respondents	Households under \$50,000/year
Under 300% Federal Poverty Level (FPL)	36%	47%
Under 200% FPL	19%	25%
Neither	33%	20%
I don't have a preference / prefer not to answer	12%	8%

[1] Survey question: Who should be eligible for a low-income discount or credit?
FPL = federal poverty level



Survey respondents were asked about options for a low-income toll program. As shown in **Table 3-2**, and respondents from households with annual incomes under \$50,000, supported providing toll caps and toll credits. Respondents were almost equally split on the free transponder plus \$25 credit, with 38% agreeing (**Table 3-2**) and about 39% disagreeing. Respondents experiencing low incomes supported all options comparatively more frequently.

Table 3-2: Key Themes from Survey Respondents – Benefit Type (N = 10,914)

Theme: Benefit Type^[1]	All Respondents Strongly Agree or Agree	Households under \$50,000/year
Daily or monthly toll caps	45%	55%
Providing a limited number of toll credits for free or discounted toll trips	44%	53%
Transit credits	40%	41%
Free transponder plus \$25 credit	38%	48%

[1] Survey question: How much do you agree or disagree with the following options for a low-income toll program? Respondents could also select options indicating disagreement, neither agreeing or disagreeing or unknown.

Respondents experiencing low incomes and respondents that identified as living with a disability supported transit credits relatively less frequently. For these groups, transit credits garnered the least support compared to the other options.

In summary, both the general population and households with incomes under \$50,000 most supported providing toll caps and toll credits. Lower-income households were more supportive of all benefit types than the general population. Both groups were more in favor of defining eligibility at the 300% FPL than at the 200% FPL threshold, but lower-income households were more supportive of either level than the general population.

Key themes from the open-ended survey responses and project emails

General themes discussed in the responses to the open-ended question and in direct emails included observations and experiences related to the need for a low-income toll program, thresholds for income eligibility, and the recommended types of credits, discounts, and exemptions, as well as ideas about income verification and self-certification. Key themes included the following:

- ➔ Many respondents indicated concern about the impact the toll would have on people experiencing low incomes, particularly in the BIPOC communities, given income inequality, limited travel options, and the increased cost of living.
- ➔ Commenters generally supported discounts, exemptions, and credits for people experiencing low incomes, including tiered and phased credits, monthly and daily caps, and an expansion of the low-income threshold. A small number of commenters also suggested exemptions for key user groups such as students, seniors, and people experiencing a disability. A few said there should be no exemptions, and that all travelers, including people experiencing low incomes, should pay at least some amount.
- ➔ Some commenters indicated their preferred thresholds or definitions for “low income.” A few mentioned that they felt the threshold for low-income eligibility should be raised. General income thresholds for exemptions, discounts, or credits discussed by commenters ranged from \$27,000 to \$80,000 per year.
- ➔ A few commenters indicated concern about the procedural burden that income verification or certification would place on people experiencing low incomes.

ODOT received two emails about discount options for people experiencing low incomes. These comments noted the following:

- Concern about the cost of administering a low-income program and the impact on taxpayers. It noted tolling programs in other states, such as Florida and New Jersey, where everyone pays the same without discounts.
- Concern that the federal poverty guidelines would be too low for senior citizens to qualify. Given this concern, the commenter recommended increasing the eligibility to \$45,000 for a married couple.



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Respondents indicated concern about the impact the toll would have on people experiencing low incomes, particularly in the BIPOC communities, given income inequality, limited travel options, and the increased cost of living.

.....

3.3 Partner Agency Engagement Period

ODOT posted the draft Low-Income Toll Report to the ODOT Tolling webpage and provided information about how to comment on June 27, 2022. During the week of June 27, ODOT sent emails to partner agencies, toll work groups, the Equity and Mobility Advisory Committee, and other stakeholders sharing the opportunity to review the draft report and provide feedback by July 18, 2022.

Key themes from partner engagement include the following:

- ➔ Support for a tiered program that reduces the impact on people just above the income threshold and acknowledges the lack of flexibility in travel time that some workers experience
- ➔ Questions about whether the higher income threshold (up to 400% FPL) or a low-income toll program overall would undermine congestion management goals
- ➔ Support for multiple payment options and preventing late fees from stacking up
- ➔ Concern about how people experiencing low incomes who live outside of the region would be affected
- ➔ Support for including Free and Reduced Lunch as a qualifying program for participation in the 200% FPL tier.



Chapter 4: Sensitivity Test for Discount Options

This chapter presents the technical analyses of the potential impacts of income-based discount options on traffic volume and gross toll revenue for the I-205 Toll Project and the Regional Mobility Pricing Project. It also highlights modeling assumptions and methodologies used for this analysis, which is meant to inform—not precisely represent—the potential outcomes of one of the options for consideration.

4.1 Outcomes

This report considered findings from two separate sensitivity test analyses. Sensitivity tests are used to test different project assumptions by changing a single variable and measuring the outcomes of that change. For these analyses, ODOT applied a 50% discount for trips made by drivers experiencing low incomes and measured daily traffic volumes on the tolled facilities (Interstate 5 [I-5] and I-205) and gross toll revenue.

The sensitivity test results do not represent exact outcomes of the options in this report; rather, they suggest the pattern of how a low-income benefits program might affect project outcomes. The tests were performed using the Metro Regional Travel Demand Model⁷ to assess future year conditions (in 2040 or 2045⁸). The modeling analyses involve a number of simplified assumptions, such as 100% enrollment in the program by all who are eligible, and high-, medium-, and low-income thresholds that do not perfectly match the federal poverty level (FPL) used in the report options for consideration.

The model results indicate that as more users take advantage of a discount program, the more likely it is that the Toll Program objectives related to revenue and congestion management could be affected.

The findings suggest that a limited low-income discount could slightly increase daily traffic volume on tolled facilities and slightly decrease gross toll revenue⁹ compared to baseline conditions without a discount.

A more inclusive discount program (with increased eligibility at a higher income threshold) could further increase daily traffic volume and decrease gross toll revenue.



⁷Metro's Research Center collects and analyzes transportation-related information to develop and maintain modeling tools for forecasting travel flows and emissions. Travel demand models use data to predict transportation choices such as trip frequency, trip origins and destinations, types or modes of transportation, and travel by time of day.

⁸Earlier analysis for the I-205 Toll Project was performed for model year 2040, but the planning horizon and associated modeling assumptions were extended to 2045 to better fit with the 20-year planning horizon for later analyses, including analysis for the Regional Mobility Pricing Project.

⁹Gross toll revenue is the sum of all money generated from collecting tolls, without taking into account any portion of the revenue that will be used to cover expenses.

4.1.1 Key Findings: I-205 Toll Project Model Sensitivity Test

ODOT performed model sensitivity tests for the I-205 Toll Project to support the refinement of assumptions for the I-205 Toll Project Environmental Assessment. **Table 4-1** shows how daily traffic volume and daily gross toll revenue may change by applying the low-income discount to the baseline project scenario, which includes two toll locations: The Abernethy Bridge and the Tualatin River bridges located east of Stafford Road. The changes represent the difference between application of a low-income discount and the baseline scenario, in year 2040 modeling. The estimated daily traffic volume increase and change in gross toll revenue are totals of the two tolled segments of I-205.

Table 4-1. Comparison of Discount Scenario to Base Toll Rate Scenario in 2040

Change Measurement	Low-Income Discount Toll Scenario (50% of Base Toll for Low Income)
Percent Change in Daily Traffic Volume	+2%
Percent Change in Gross Toll Revenue	-1%

In summary, the 2040 model results indicate that a low-income discount could slightly increase daily traffic volume (2% from the baseline) and could slightly decrease gross toll revenue (1% from the baseline).

4.1.2 Key Findings: Regional Mobility Pricing Project Model Sensitivity Test

ODOT tested two low-income discount scenarios for the Regional Mobility Pricing Project. The first test applied a 50% toll discount to low-income vehicle trips, which make up about 10% to 15% of potential automobile trips on I-5 and I-205. The second test applied a 50% toll discount to the same low-income vehicle trips in addition to half of the medium-income vehicle trips, accounting for a total of 35% to 40% of potential auto trips on I-5 and I-205. **Table 4-2** shows the estimated effects that each discount could have on I-5 and I-205 volumes and the gross Regional Mobility Pricing Project toll revenue, based on modeling for 2045 conditions.

Table 4-2. Comparison of Discount Scenarios Versus Congestion Pricing without Discount Applied in 2045

Change Measurement	Smaller Discount Program (50% Discount for Low-Income Trips)	Larger Discount Program (50% Discount for All Low-Income Trips Plus Half of Medium-Income Trips)
Percent Change in Daily Traffic Volume	increase of 2%	increase of 4%
Percent Change in Gross Toll Revenue ^[1]	decrease of less than 5%	decrease of 10 – 15%

[1] The gross toll revenue impacts described in this section are based on raw model results and toll rate assumptions. They are intended for relative comparisons and do not represent net toll revenue estimates.

In summary, the smaller (less inclusive) discount program (50% discount on all low-income trips) would increase daily traffic volume by 2% from the baseline, and the larger discount program (50% discount on all low-income trips and half of medium-income trips) would increase daily traffic volume by 4% from the baseline in 2045. The smaller discount program would decrease gross toll revenue by less than 5%, and the larger discount program would decrease gross toll revenue by 10% to 15%.

4.2 Considerations for Sensitivity Tests

As discussed above, the sensitivity tests involved a number of simplified assumptions and model inputs. This section describes key considerations to take note of with regards to the income thresholds model input and value of time/willingness to pay assumption.

4.2.1 Income Threshold

As mentioned previously, the Metro Regional Travel Demand Model used to produce these results uses different income thresholds than the FPL thresholds referenced in the report options for consideration. Trips in this model are divided into three groups based on household income:

Low Income: Household income under approximately \$30,000 per year (in current year dollars)

Medium Income: Household income between approximately \$30,000 and \$125,000 per year (in current year dollars)

High Income: Household income above approximately \$125,000 per year (in current year dollars)

As shown in **Table 4-3**, the 2021 FPL thresholds are split into individual household/family size, ranging from 1 person to 14 people, rather than the entire household on average. Because the Regional Travel Demand Model does not account for household/family size associated with each vehicle trip, the outcomes reported in the Key Findings sections in Section 5.1 above cannot be directly tied to the income thresholds used in the model. However, these data provide a helpful point of reference for how income classes in the model relate to FPL.

Table 4-3: Annual Household Income Thresholds for 200% and 400% of the 2021 Federal Poverty Level

Household/Family Size	200% FPL	400% FPL
1	\$27,180	\$54,360
2	\$36,620	\$73,240
3	\$46,060	\$92,120
4	\$55,500	\$111,000
5	\$64,940	\$129,880
6	\$74,380	\$148,760
7	\$83,820	\$167,640
8	\$93,260	\$186,520
9	\$102,700	\$205,400
10	\$112,140	\$224,280
11	\$121,580	\$243,160
12	\$131,020	\$262,040
13	\$140,460	\$280,920
14	\$149,900	\$299,800

Source: U.S. Department of Health and Human Services. 2022. HHS Poverty Guidelines for 2022.

<https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>. FPL = federal poverty level

Note: The administration and design of the program is still to be determined. However, 200% FPL was chosen because it is keyed to other federal or state benefits enabling more efficient administration for ODOT. A program tied to 400% FPL may be harder to administer because few, if any, state or federal benefits are tied to income at that level.

4.3 Modeling Assumptions

Each household is assigned to an income class in the Regional Travel Demand Model, and vehicle trips generated by these households are assigned a particular willingness to pay a toll, as represented by a value-of-time (VOT) assumption. This determines how a monetary toll assumption affects travel behavior in the model. For example, a driver with a high VOT is more willing to pay a toll for the travel-time savings that the tolled facility would offer than a driver with a low VOT, even though the amount of money paid is the same for both drivers.

The current model assumptions directly tie income and VOT: low-income drivers are predominately assigned a low VOT. In reality, VOTs are more dynamic than is captured within the aggregate values included in the model framework. Willingness to pay tolls can be highly situational, and thus a range of values could be applicable to trips with identical model characteristics.



Chapter 5: Regional Analysis

This chapter considers income levels in the Portland and southwest Washington regions in relation to the federal poverty level (FPL) and alternative ways, beyond the FPL, to determine eligibility in the region. It describes a decision-making framework and a set of metrics to evaluate different benefit options. The decision-making framework was central to informing development of the options for consideration presented in this report.

As noted in Chapter 4, using the FPL as a benchmark introduced many complexities for interpretation of the sensitivity test analyses. These complexities included accounting for differences in household size when modeling and the insufficiency of using the FPL alone as a threshold for low or medium incomes in urban areas. At the same time, using a nationally recognized federal benchmark like the FPL can make a program easier to understand from the perspectives of both program operators and the public and can foster consistency with other similar programs. These complex considerations and trade-offs warrant further examination of:

- How the FPL relates to the people living in communities surrounding Portland, including southwest Washington;
- How the FPL relates to more regionally specific income thresholds (ALICE and SSS¹⁰); and
- Benefit recommendations resulting from these relationships.

5.1 Income Levels by Geography

In 2022, the average annual income at 200% FPL is \$27,142 for a household/family size of one and \$55,500 for a household/family size of four. In the Portland-Vancouver-Hillsboro, OR-WA Metropolitan Statistical Area (MSA), about 25% of the population experiences low income at or below 200% FPL and 54% have incomes at or below 400% FPL. These percentages are lower than Oregon overall, and the proportion of people experiencing both levels of low incomes is higher in Oregon than in Washington. **Table 5-1** displays the population totals and income levels by geography. The table includes percentage of the population experiencing incomes below the FPL not only as a point of comparison but to demonstrate that using the FPL alone as a threshold in the Portland metro area is too stringent to serve a practical purpose and to provide a widespread benefit. These statistics provide context for determining eligibility for the low-income program.

Table 5-1. Populations in the Portland Metropolitan Statistical Area, Oregon, and Washington by Share of the Federal Poverty Level

Demographic (U.S. Census Bureau Classifications)	Metropolitan Statistical Area ^[1]	Oregon	Washington
Total Population	2,412,378	4,052,019	7,266,810
100% FPL	11%	13%	11%
200% FPL	25%	31%	26%
400% FPL	54%	61%	55%

Source: U.S. Census Bureau, American Community Survey, 2015 to 2019. S1701 Poverty Status in the Past 12 Months.

[1] Metropolitan Statistical Area = Portland-Vancouver-Hillsboro, OR-WA Metro Area

¹⁰ALICE is the acronym for Asset Limited, Income Constrained, Employed, and represents households with incomes above the FPL but that still don't make enough to pay for the basic cost of living. SSS is the acronym for Self-Sufficiency Standard, which is a measure of the cost for a family to make ends meet without assistance.

5.2 Eligibility for the Portland Region

Since the FPL alone has been demonstrated to be too restrictive to use as a benchmark for the program to provide widespread benefits, feedback from the Equity and Mobility Advisory Committee and stakeholders supported using a more inclusive income threshold. While multiples of the FPL shown above (i.e., 200% and 400% FPL) are commonly used for similar programs, the Oregon Department of Transportation (ODOT) assessed two alternative methodology models:

- **ALICE** (Asset Limited, Income Constrained, Employed) uses a standardized set of measurements to quantify the cost of a basic household budget in each county of partner states. The ALICE Threshold represents the minimum income level necessary for survival for a household and is derived from the ALICE Household Survival Budget—the bare minimum cost of household basics including housing, childcare, food, transportation, technology, and health care, plus taxes and a contingency amount equal to 10% of the household budget. The ALICE Household Survival Budget (for Oregon in 2018) for one adult, one preschooler, and one child is \$56,523.¹¹ ALICE also calculates a Household Stability Budget, which estimates the higher costs of maintaining a viable household over time, including a 10% savings category that can be used in an emergency, for additional education, or to buy a home.¹² For 2018, the most recent data year, the ALICE is \$51,216 for a household/family size of one and \$118,896 for a household/family size of four.
- **Oregon SSS** (Self-Sufficiency Standard for Oregon) calculates how much income a family must earn to meet basic needs and is derived from the costs of housing, childcare, food, healthcare, and transportation, plus the cost of taxes and impacts of 2021 tax credits. The Oregon SSS minimum cost of living tends to be higher than the ALICE minimum cost of living. For the counties of the Portland Metropolitan Statistical Area, the Oregon SSS for one adult, one preschooler, and one school-age child is around \$60,000 to \$80,000. **Table 5-2** shows the SSS by county.

¹¹United for Alice. <https://www.unitedforalice.org/household-budgets/oregon>.

¹²United for Alice. <https://www.unitedforalice.org/household-budgets-mobile/oregon>

Table 5-2: Portland Metro SSS Compared to the Federal Poverty Guidelines

County	Annual SSS	As a Percentage of Federal Poverty Guidelines
Clackamas County	\$78,355.02	357%
Columbia County	\$67,966.03	309%
Multnomah County	\$79,710.87	363%
Washington County	\$78,106.52	356%
Yamhill County	\$68,352.56	311%
Clark County	\$64,600.25	294%
Skamania County	\$59,272.81	270%

Source: University of Washington.2021. The Self-Sufficiency Standard for Oregon 2021. <https://www.oregon.gov/workforceboard/data-and-reports/Documents/The-Self-Sufficiency-Standard-For-Oregon-2021.pdf>.

SSS = Self-Sufficiency Standard

Both the ALICE and SSS methodologies calculate standards for unique combinations of county and family composition. **Table 5-3** gives examples of the varying SSS by county and household size as a percentage of the FPL, demonstrating that meeting this standard can range from earning 221% of the FPL for a household of one in Skamania County, Washington, to earning 497% of the FPL for a household of five in Multnomah County, Oregon. Various household compositions and sizes of 6 to 20 are also calculated in the SSS but not shown below. The SSS per household size indicated below are averages taken from all household compositions per household size.



Table 5-3. Portland Metro SSS Compared to Federal Poverty Guidelines by Household Size

Family Size	1	2	3	4	5
Clackamas County	\$ 36,249.70	\$57,349.17	\$71,700.00	\$95,112.94	\$144,944.23
%FPL	281%	329%	327%	359%	467%
Columbia County	\$32,543.45	\$51,364.19	\$63,135.63	\$82,911.86	\$122,969.33
%FPL	253%	295%	288%	313%	396%
Multnomah County	\$31,801.10	\$54,173.98	\$70,300.35	\$95,727.33	\$154,422.78
%FPL	247%	311%	320%	361%	497%
Washington County	\$36,155.86	\$57,191.33	\$71,403.40	\$94,806.47	\$144,473.67
%FPL	281%	328%	325%	358%	465%
Yamhill County	\$33,210.14	\$51,912.40	\$63,531.74	\$83,371.06	\$123,464.96
%FPL	258%	298%	289%	315%	398%
Clark County	\$30,756.90	\$48,584.59	\$60,219.16	\$79,647.82	\$120,376.66
%FPL	239%	279%	274%	301%	388%
Skamania County	\$28,484.07	\$44,680.15	\$54,932.57	\$71,964.98	\$106,813.92
%FPL	221%	256%	250%	272%	344%
Overall	\$32,743.03	\$52,179.40	\$65,031.83	\$86,220.35	\$131,066.51
%FPL	254%	300%	296%	325%	422%

Source: University of Washington 2021. The Self-Sufficiency Standard for Oregon 2021. <https://www.oregon.gov/workforceboard/data-and-reports/Documents/The-Self-Sufficiency-Standard-For-Oregon-2021.pdf>.

FPL = federal poverty level; SSS = Self-Sufficiency Standard

While the fact that these standards are highly specific to family composition and geography makes them more accurate in terms of estimating the level of income that's required for families to meet their critical needs, it also makes it difficult to practically apply to the process of determining household eligibility. This is because requesting home location and family members' ages significantly increases the complication of the information needed to determine eligibility. ALICE and SSS can still be used to judge the effectiveness of using FPL multiples as benchmarks in reaching the right level of intended users.

See **Table A-3** in Appendix A for more information on ALICE and the Oregon SSS.

Chapter 6: Case Study Findings

This chapter reviews best practices and lessons learned from other income-based toll programs and fare systems. The case study analysis and stakeholder interviews revealed many barriers to enrollment in low-income benefit programs, but providers still face difficulties in lowering those barriers. The review of national programs and feedback from the Equity and Mobility Advisory Committee feedback suggest that the other programs' benefits, such as free transponders or a \$25 annual credit, are not appealing enough to increase enrollment significantly.

6.1 National Case Studies

The process to develop this report included a national scan of existing or proposed low-income programs that could offer best practices or lessons learned. This research identified only two low-income toll programs operating in the United States. While the lessons learned from the two programs are valuable, the research effort was also broadened to assess low-income programs in Oregon in general and relevant transit fare low-income programs, as well as proposed low-income toll programs. The research also included a focus on enrollment options for low-income programs.



6.1.1 Existing Low-Income Toll Programs

The two existing low-income toll programs are in Los Angeles and in the Norfolk, Virginia, metro area.

For eligible participants, the **LA Metro Low-Income Assistance Program** waives a \$1 monthly account maintenance fee and provides a \$25 credit to offset the cost of purchasing the transponder.¹³ Households that report an annual household income of less than 200% of the federal poverty level (FPL) are eligible. The program's value was initially set to match the cost of the transponder, and, as such, another way to describe the program is that it provides a free transponder to participants. Because of the relatively low value of the benefit, LA Metro does not require users who have qualified for the program to re-qualify on a recurring basis. In 2020, LA Metro considered increasing the value of the toll credit provided to participants, since there is an understanding that despite significant marketing efforts, the limited enrollment in the program is likely due to the low value of the benefits provided to users—3% of all transponders used on the toll corridors are enrolled in the program. Furthermore, LA Metro also provides toll credits for users of transit on the corridor (and bus passes for roadway users) and uses net revenues from the corridor to fund multimodal mobility projects in adjacent communities. The key lessons learned are:

- Transponder purchase costs can be a barrier for corridor users experiencing low incomes.
- If the program verifies income, it may not be necessary to re-verify annually.
- Program enrollment will be low if the value of the benefit is low.
- It is possible to use toll revenues for equity programs beyond providing credits and percentage discounts.

¹³<https://www.metroexpresslanes.net/offers-discounts/low-income-assistance/>

The **Virginia Department of Transportation (VDOT) Toll Relief Program** provides eligible participants with discounts on various toll tunnels in the Norfolk, Virginia, metro area. In order to join the program, users must apply at an E-ZPass customer service center, of which there is one in each city, both of which are on bus lines and are accessible to people with disabilities. This program provides low-income residents of two towns directly adjacent to the toll tunnels a 50% discount on their first ten trips per week. Until recently, this program was designed differently so that benefits would accrue primarily to drivers using the tunnels frequently—approximately 2,000 to 3,000 users are enrolled in the program, with the average benefit being approximately \$25 per month. A prominent aspect of this program is that it is led by a steering committee of local stakeholders, including representatives from the NAACP, the Hispanic Chamber of Commerce, local military bases, local business owners, and local elected officials. With a diverse slate of members, a steering committee involving local stakeholders can help focus communities continue to have a voice with regard to program features and functions on a recurring basis once it is implemented. As a further equity accommodation, VDOT dropped the required minimum balance on the E-ZPass transponder from \$35 to \$20. VDOT has found that enrollment, verification, and maintenance costs add up to approximately 15% of the value of the benefit distributed—the state pays for these aspects of the program, and the private concessionaire absorbs the cost of the reduced tolls.

The key lessons learned are:

- It is likely that significantly less than all eligible corridor users will enroll in a low-income program.
- A steering committee or equity panel can help people experiencing low incomes continue to shape the program after implementation.
- Requiring a minimum account balance and placing a minimum threshold on automatic reloading can be significant barriers for people experiencing low incomes.
- The cost of income verification is a significant share of overall program costs for low-income toll programs.
- A thoughtful and broadly accessible enrollment process is key to driving program enrollment and equity.

Additional research on corridor-length and shorter-length (e.g., bridge replacement) tolling programs and projects is included in Appendix A.



6.1.2 Proposed Low-Income Toll Programs

Various states and cities around the United States are actively considering implementing low-income toll programs, including Washington State; the Oakland, California, metro area; the San Francisco metro area; San Bernardino County, California; Colorado; and Minnesota. The studies conducted for these programs reflect the lessons learned from existing programs, and also include:

In Washington state:

- The proposed program provides recurring monthly toll credits or free toll trips to all eligible Washington residents with annual incomes at or below approximately 200% FPL using the corridor, and proposes to provide free transponders, establish a program advisory panel, and be intentional about program accessibility.
- The State has an existing online system for instantly checking whether an individual has qualified for any state benefits, significantly simplifying the income verification process.
- The proposed low-income toll program was chosen to:
 - » acknowledge the value of program simplicity for users and implementing agencies,
 - » be responsive to stakeholder and user feedback that occasional free trips were highly valuable for making emergency trips,
 - » leave open the possibility that transponders may not have required balances, credit, or debit cards for program users, all of which can present significant barriers, and
 - » be flexible in when the benefits can be used, to acknowledge that people experiencing low incomes have diverse mobility needs, and they know their own mobility needs best.
- A program option choice framework considering user benefits, program practicality, and costs guided the choice of program options, with the framework reflecting feedback, knowledge, and preferences from stakeholders, decision makers, and the community.

In the Oakland, CA, metro area, the implementing agency has expressed a desire to learn by observation rather than modeling or a multiyear study and is launching a pilot of a low-income toll discount program on a set of express lanes.

In Colorado, the proposed low-income toll program for new, variable-rate express lanes includes a significant amount of choice for users and the community.¹⁴ The program is available for residents of Globeville and Elyria-Swansea—two neighborhoods in the Denver metro area—with annual household incomes below 200% FPL. Program participants can choose from a \$100 toll and/or transit credit. The program is planned to be set up with an advisory panel, and in future years, the community will choose whether to allocate funding from net toll revenues to further toll credits, transit credits, or a combination. This kind of choice makes programs more complicated for users and implementers but can provide significant value to program users and communities who understand their own needs best.

¹⁴<https://www.codot.gov/programs/expresslanes/gestollingequity>

In the San Francisco, CA, metro area, the San Francisco County Transportation Authority (SFCTA) is planning to implement tolls to access 8,000 new residential units and commercial developments on Treasure Island.¹⁵ Tolls are expected to go into effect in 2025 and will be variably priced by time of day. Tolls on Treasure Island will be in addition to existing tolls on the San Francisco-Oakland Bay bridge that provides access to the Island. As part of the evaluation of toll rates, various discounts and exemptions are being assessed. The San Francisco Board of Supervisors decided existing Treasure Island residents will not be required to pay a toll. Nonresidents and new residents will be tolled when entering and exiting the island. SFCTA is proposing a tiered benefit, with a toll waiver for very low-income households (<55% area median income [AMI]), and a 50% discount for low- and moderate-income households (50% to 80% AMI and 80% to 120% AMI, respectively). The agency had also evaluated program options with even more tiers of eligibility and benefits. Notably, the agency feels that 200% FPL as a threshold for low-income determination is too low in the San Francisco area.

- In addition to toll discounts and exemptions, Treasure Island residents living in below-market rate housing will qualify for a transit pass at a 50% discount. Tolls and parking fees will help manage congestion and pay for expanded transit and ferry service, island shuttle service, and bike/pedestrian improvements.
- Consideration is also being made for low-income and non-profit workers employed on the island to receive a monthly subsidy through their employers to offset the cost of travel to access their jobs.
- This program and various considerations on toll impacts on communities illustrates how the use of a combination of geographic eligibility and locally relevant income thresholds can create an equitable program that still delivers significant infrastructure and transit improvements.

¹⁵ <https://www.sfcta.org/projects/treasure-island-transportation-program#panel-key-features>

6.1.3 Existing Low-Income Transit Fare Programs

Transit agencies around the country offer discounts to people experiencing low incomes. This section discusses the three programs with relevant lessons learned and practices. The funding and operations models for highways and transit agencies are significantly different, and as such the levels of benefit provided may not be analogous to toll road contexts.

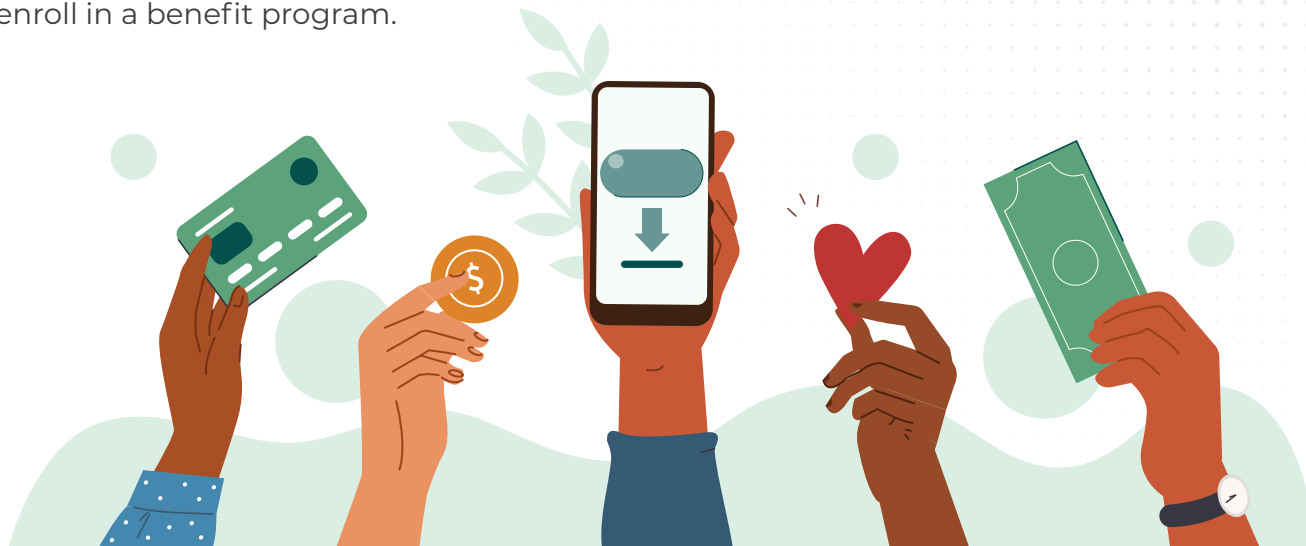
TriMet, the primary public transportation operator in the Portland metro area, offers a low-income assistance program that provides qualifying riders with reduced fares. The agency's electronic fare program, Hop Fastpass, can also be used on the Portland Streetcar and buses operated by C-TRAN, the Clark County, Washington, public transportation agency. Program eligibility comprises four principles: applicants must be Oregon residents, have incomes at or below 200% FPL, be between the ages of 16 and 64 (with older and younger individuals eligible for different discount programs), and verify their identity. The program provides between a 50% and a 75% discount on various transit passes. Best practices and key lessons learned from this program include:

- Program funding is through payroll taxes and as such is reliable and sustainable.
- The program requires users to provide proof of income, and TriMet feels this causes them to turn away potential users who are probably eligible but don't have the appropriate paperwork.
- The agency encourages high levels of enrollment in its low-income benefit program (with approximately 10% of eligible individuals in the Portland metro area enrolling) through:
 - » Designing the program to have a single point of centralized administration within the government, while also having many different points of contact for participants, since TriMet is partnered with cities and community organizations to help people access the benefit.
 - » Providing multiple enrollment options, with an online application as well as seven in-person locations, reducing barriers to enrollment.

In the Seattle, WA, metro area, **King County Metro** provides two low-income fare programs, one providing discounted rides to people with incomes below 200% FPL and the other providing free rides to people who have incomes below 80% FPL and are enrolled in one of six state benefit programs.¹⁶ Their key lessons are:

- Recognizing that people have a wide range of ability to pay for transportation costs and therefore creating a tiered program to provide more benefits to people experiencing very low incomes as opposed to people experiencing moderately low incomes.
- Using enrollment in other government programs as a substitute for direct verification of income for program enrollment.

LA Metro's Low-Income Fare is Easy (LIFE) program provides a free 90-day transit pass, followed by a choice of fare credit or fare discount. A key practice from the program is its use of self-certification, in which program users are allowed to state that their income is below the program's eligibility thresholds without having to provide further documentation. This process makes the enrollment process easier for program participants and cheaper for the implementing agency. Furthermore, the agency encourages enrollment by promoting the program and allowing in-person registration at pop-up locations and community fairs—in general, meeting potential participants where they already are can greatly increase the share of people who enroll in a benefit program.



¹⁶The six Washington state benefit programs: Temporary Assistance for Needy Families (TANF)/State Family Assistance (SFA), Refugee Cash Assistance (RCA), Aged, Blind, or Disabled Cash Assistance (ABD), Pregnant Women Assistance (PWA), Supplemental Security Income (SSI), Housing and Essential Needs (HEN).

6.2 Lessons Learned for Eligibility and Enrollment

This case study analysis provides insight into best practices for, and lessons learned from, existing and planned programs. This section expands upon the previous discussion to focus on eligibility and enrollment. An overall theme is that driving enrollment in low-income toll programs, and in benefit programs in general, is a significant challenge. Barriers can include knowledge and understanding of the programs, the low value of benefits provided, balance and banking requirements for transponders, the cost and complication of in-person and paperwork-intensive enrollment processes, and a lack of thorough accessibility in the enrollment process. For example, the review of national programs and feedback from the Equity and Mobility Advisory Committee suggests that the benefits offered by some other programs, such as free transponders or a \$25 annual credit, are insufficiently appealing to someone going through the enrollment process.

The following subsections summarize best practices and lessons learned from the national case studies in two categories: eligibility thresholds and self-certification.

6.2.1 Eligibility Thresholds

Income thresholds for benefit programs can consist of a single threshold, for example everyone whose income is below the FPL qualifies, which are called one-tier programs. Alternately, they can consist of multiple thresholds, for example people with incomes below the FPL receive a large benefit and people with incomes below 300% FPL receive a smaller benefit, which are called multi-tier programs. Multi-tier programs are more challenging to implement and harder for users to understand, but they are often more equitable and economically efficient in distributing benefits to those who most need it, while still providing benefits to people experiencing moderately low incomes. Both one-tier and multi-tier eligibility thresholds are used for benefit programs around the country.

Many of the toll and fare equity programs analyzed use a multiple of the FPL as a reference to determine eligibility for benefits. FPL is widely known, but it no longer reflects the current cost of basic household necessities or differences in cost of living across geographies in the United States. Depending on the median income in an area, people experiencing low incomes or very low incomes compared to other members of their local community may still have incomes that fall above the FPL. Agencies in Portland, and the other geographies listed above, use a multiple (e.g., 200%) of the FPL as a threshold to right-size the program eligibility threshold with the local cost of living. **Table 6-1** outlines income requirements used by the low-income programs listed in the case studies.

Table 6-1. Income Requirements for Various Low-Income Programs

Program	Income Cap Requirements
LA Metro toll program ^[1]	200% FPL
VDOT toll program ^[2]	Approximately 200% FPL
Washington proposed toll program ^[3]	Approximately 200% FPL
San Francisco proposed toll program ^[4]	Various tiers, up to median area income
TriMet fare program ^[5]	200% FPL
King County Metro fare programs ^[6]	200% FPL for lower tier; 80% FPL plus enrollment in one of six state benefit programs for higher tier
LA Metro fare program ^[7]	HUD very low income level for Los Angeles

^[1] <https://www.metroexpresslanes.net/offers-discounts/low-income-assistance/>

^[2] <https://www.virginiadot.org/newsroom/statewide/2021/enrollment-now-open-for-2022-vdot-toll-relief-program12-1-2021.asp#:~:text=Beginning%20December%201%2C%202021%2C%20Norfolk,to%2010%20trips%20per%20week.>

^[3] <https://wstc.wa.gov/wp-content/uploads/2021/08/2021-WSTC-Tolling-Equity-Report.pdf>

^[4] https://www.sfcta.org/sites/default/files/2022-01/TIMM_PIR_2021_2022-01-21.pdf

^[5] <https://trimet.org/lowincome/>

^[6] <https://kingcounty.gov/depts/transportation/metro/fares-orca/subsidized-annual-pass.aspx>; <https://kingcounty.gov/depts/transportation/metro/fares-orca/orca-cards/lift.aspx>

^[7] <https://kingcounty.gov/depts/transportation/metro/fares-orca/orca-cards/lift.aspx>

FPL = federal poverty level; HUD = U.S. Department of Housing and Urban Development; VDOT = Virginia Department of Transportation

As discussed elsewhere in this report, two methodologies called ALICE (Asset Limited, Income Constrained, Employed) and Oregon SSS (Self-Sufficiency Standard) attempt to calculate an updated version of the FPL, assessing the income one needs to fulfill all basic necessities based on family size and home geography. The resulting figures are significantly higher than the FPL, and for the Portland metro area are in the vicinity of 400% of the FPL.

6.2.2 Self-Certification

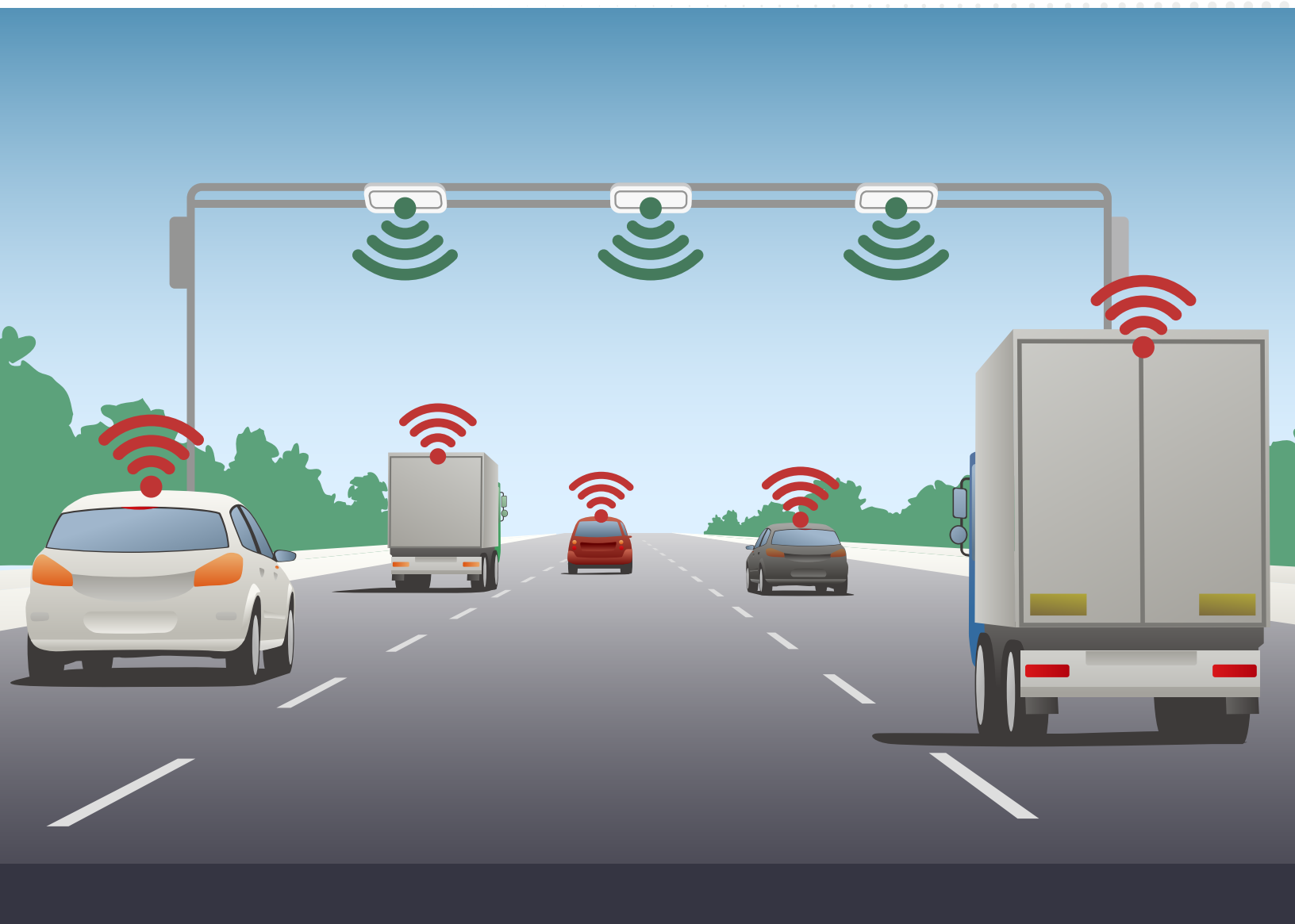
To qualify for enrollment in low-income benefit programs, applicants are required to state or demonstrate that their household income meets the eligibility requirements. Applications may require documentation to prove income, such as a paystub, benefit letter, or other approved document. However, self-certification allows applicants to certify their income without substantiating documents. Applicants may be asked to check a box on the application that says, “I verify that the income I selected is true.” Some programs may also require applicants to agree to provide proof of income in the future.¹⁷ Self-certification reduces barriers to enrollment in low-income benefit programs. Benefit programs in general, and particularly programs with self-certification, commonly generate discussion and concerns about the possibilities of fraud. In practice, much of this discussion is grounded in prejudice and stereotype, and benefit programs like the low-income toll program being considered here do not generate a meaningful amount of fraud. When balanced against the significantly lower costs of program operation, increased enrollment, and time and cost saved to program users, the benefits are likely to outweigh the costs. In particular, the low-income toll program would have features that further limit the potential for and cost of fraud:

- **Benefits cannot be cashed out:** The fact that the benefits can only be used for travel on the toll corridors, and cannot be cashed out, significantly limits the potential for professionalized fraud at scale, by far the most visible kind of fraud observed in benefit programs.
- **Use of the benefit is limited:** The low-income toll benefit only applies to people who use the tolled portions of I 5 and I-205, which significantly limits the potential for fraud, because users have to live in the project area (and not qualify for the program themselves).
- **Benefits are administered on a small scale:** Each person only receives one instance of the benefit at a time. Furthermore, if the final benefit chosen is bounded—that is, it is a credit or a number of free trips, that makes fraud even less appealing, because it is much less likely that many people will commit fraud for a benefit that is limited to a fairly small value.

¹⁷Self-certification example: <https://www.hudexchange.info/resource/4786/cdbg-selfcertification-of-annual-income-form>

More research may be needed to understand whether a full exemption would invite more illegitimate use of the program by extremely frequent (for example commercial) users of the corridor, who can thus achieve significant savings by misusing the program. A preferred way of addressing this issue would be to perform focused income checks for self-certified accounts that become power users of the program.

Self-certification of income can be beneficial to increase accessibility to the low-income toll program and therefore increase overall enrollment. Although there may be concerns about fraud, some of which arise more from stereotype and bias, administering a program without self-certification may be more costly than potential losses from fraud.



Chapter 7: Evaluation Framework for Type of Benefit

This chapter provides a high-level evaluation framework ODOT developed using other agencies' experiences and input from various stakeholders to evaluate different options for the low-income benefit.

To help guide the options for consideration in this report, ODOT used other agencies' experiences and the input from various stakeholders to develop a high-level evaluation framework and a set of metrics to evaluate different benefit options. Further detail on the metrics and the evaluation framework is provided in the Regional Mobility Pricing Project Spring 2022 Engagement Report. The evaluation framework considers the type(s) of benefits to provide, the method of enrollment, and the selection of income criteria.

The set of metrics include:

- Benefit to program participants
- Cost of program implementation
- Impact on roadway operations
- Feasibility of implementation

Key concepts used in the evaluation framework include the following:

Income threshold: Household income within a defined range of eligibility for program participation (e.g., households within 0% to 100% of the federal poverty level).

Toll discount: A discount applied to the assessed toll for each trip (e.g., 50% discount on a \$3 toll would result in the driver paying \$1.50). A toll discount is applied as the trip is charged, so the driver would pay the discounted price. Percentage discounts are the easiest benefit for participants to understand and track but require reloading a toll account and may incentivize travel during peak hours.

Toll credit: A credit applied to a transponder account on a recurring basis (e.g., a \$25 toll credit applied to the transponder account every 6 months). Credits diminish the burdens of payment card requirements, minimum account balances, and automatic reloading events. Since minimum account balances and payment card requirements are significant enrollment barriers, it is expected that a toll credit or free trip benefit would lead to greater enrollment than a percentage discount. Credits also incentivize travel during non-peak hours.

Free trip(s): A set number of free trips are applied to a transponder account on a recurring basis (e.g., 10 free trips in the tolled area per month). Free trip(s) diminish the burdens of payment card requirements, minimum account balances, and automatic reloading events but may incentivize travel during peak hours. Since minimum account balances and payment card requirements are significant enrollment barriers, it is expected that a toll credit or free trip benefit would lead to greater enrollment than a percentage discount.

Exemption: Those enrolled in the low-income toll program are exempt from paying any toll costs. This discount option places the least burden on travelers experiencing low incomes but may incentivize travel during peak hours.

Income verification: The process to determine that an applicant is within the eligible income range. This can be done through providing proof of income (such as a W2), through enrollment in another approved low-income benefit program (such as the Supplemental Nutrition Assistance Program [SNAP]), or through self-certification (applicant certifies their income without proof of income). Income verification can be a barrier to enrollment, but that can be improved by accepting enrollment in another low-income benefit program or allowing self-certification.














Based on the decision-making framework and the set of metrics, a score was assigned to each benefit option. The score was shaped by the relative weighting of each metric. Both the weighting for each metric and the score for each option on each metric can be revised based on feedback from stakeholders. This iterative revision process is part of the decision-making framework.

The following high-level ideas are the basis of the decision-making framework, the weighting for each metric, and the initial scores:

- People experiencing low incomes have a diverse set of travel needs, and their commute trips tend to be more broadly distributed at all hours of the day, as opposed to being confined to peak hours.
 - A multi-tier eligibility threshold makes tolling less regressive than a single tier, but it is harder for program users to understand and costlier to implement. Stakeholders have emphasized the benefits of both options: simplicity is critical, but so is acknowledging the different travel and budget needs of people experiencing very low incomes as opposed to people experiencing moderately low incomes.
 - Several toll discount options, including credits, free trips, percentage discount, tax credit, or full exemption, are presented for evaluation. Considerations regarding these discount options include the following:
 - » Credit or free-trip option (as opposed to a percentage discount) diminishes the burdens of credit card or debit card requirements, minimum account balances, and automatic reloading events. Since minimum account balances and payment card requirements are significant enrollment barriers, it is expected that a toll credit or free trip benefit would lead to greater enrollment than a percentage discount.
 - » Given the early stage in developing the Oregon Toll Program, all discount options appear equally feasible from a tolling back-office perspective.
 - » Percentage discounts and free trips incentivize travel during peak hours and add trips to the toll network when it is most stressed due to peak-hour demand. In contrast, toll credits and fixed discounts incentivize traveling off-peak, but they also have less impact on making the time-saving distribution more equitable.
 - » Percentage discounts are easiest to understand and track for program participants, but they have disadvantages, such as necessitating the funding of toll accounts, whether with cash or a credit/debit card, both of which can present challenges for people experiencing low incomes.
 - » Stakeholders broadly support percentage discounts, credits, and a fixed number of free trips.
 - » Self-certification is a much simpler model of income verification for the implementing agency and for the applicant than a verification option that requires paperwork.
- The decision-making framework based on the high-level ideas above led to the scoring system shown in **Figure 7-1**. Higher numerical scores (up to 6.2) are better, and lower scores (down to 3.4) are considered worse. In general, the scores indicate the following:
- A recurring credit or a recurring number of free trips provides the greatest combined value for users and the operating agency, followed by a percentage discount.

- Self-certification is more efficient overall than actively verifying income on enrollment.
- One-tier and multi-tier options both work well, with a slight edge to multi-tier program versions.

Figure 7-1. Initial Scores for Each Discount Option

Discount Option	Enrollment	Tier	Score*	Primary Rationale	
Percent Discount	Self-Certification	One-tier	5.0	These options are both more cost effective and feasible	 
		Multi-tier	5.3		
	Confirmed Eligibility	One-tier	3.6	These options have a lower user benefit	
		Multi-tier	3.7		
Number of Free Trips	Self-Certification	One-tier	6.1	These options have a higher user benefit	
		Multi-tier	6.2		
	Confirmed Eligibility	One-tier	4.1	These options have a lower user benefit and are more expensive	 
		Multi-tier	4.1		
Monthly Credit	Self-Certification	One-tier	5.7	These options are more cost effective and have a higher operational impact	 
		Multi-tier	5.8		
	Confirmed Eligibility	One-tier	4.0	These options present more feasibility challenges	
		Multi-tier	4.0		
Fixed Discount	Self-Certification	One-tier	4.7	While these options are more cost effective, they provide less user benefit	 
		Multi-tier	5.0		
	Confirmed Eligibility	One-tier	3.4	These options present less user benefit and have more feasibility challenges	 
		Multi-tier	3.5		

*Higher numerical scores (up to 6.2) are better, and lower scores (down to 3.4) are considered worse.

SCORE FACTOR



User Benefit



Program Cost



Operational Impact



Other Feasibility

The [Toll Program and Affordability Research](#), the Regional Mobility Pricing Project Spring 2022 Engagement Report, and the appendices of this report provide a review of low-income toll programs and additional information on the evaluative framework.

Chapter 8: Options for Consideration

This chapter details this report's three options for establishing and operating a low-income toll program: (1) provide a significant toll discount, (2) provide a smaller, more focused toll discount, and (3) use a verification process that leverages existing programs. The analysis of each of these options for consideration is organized into a four-part discussion:

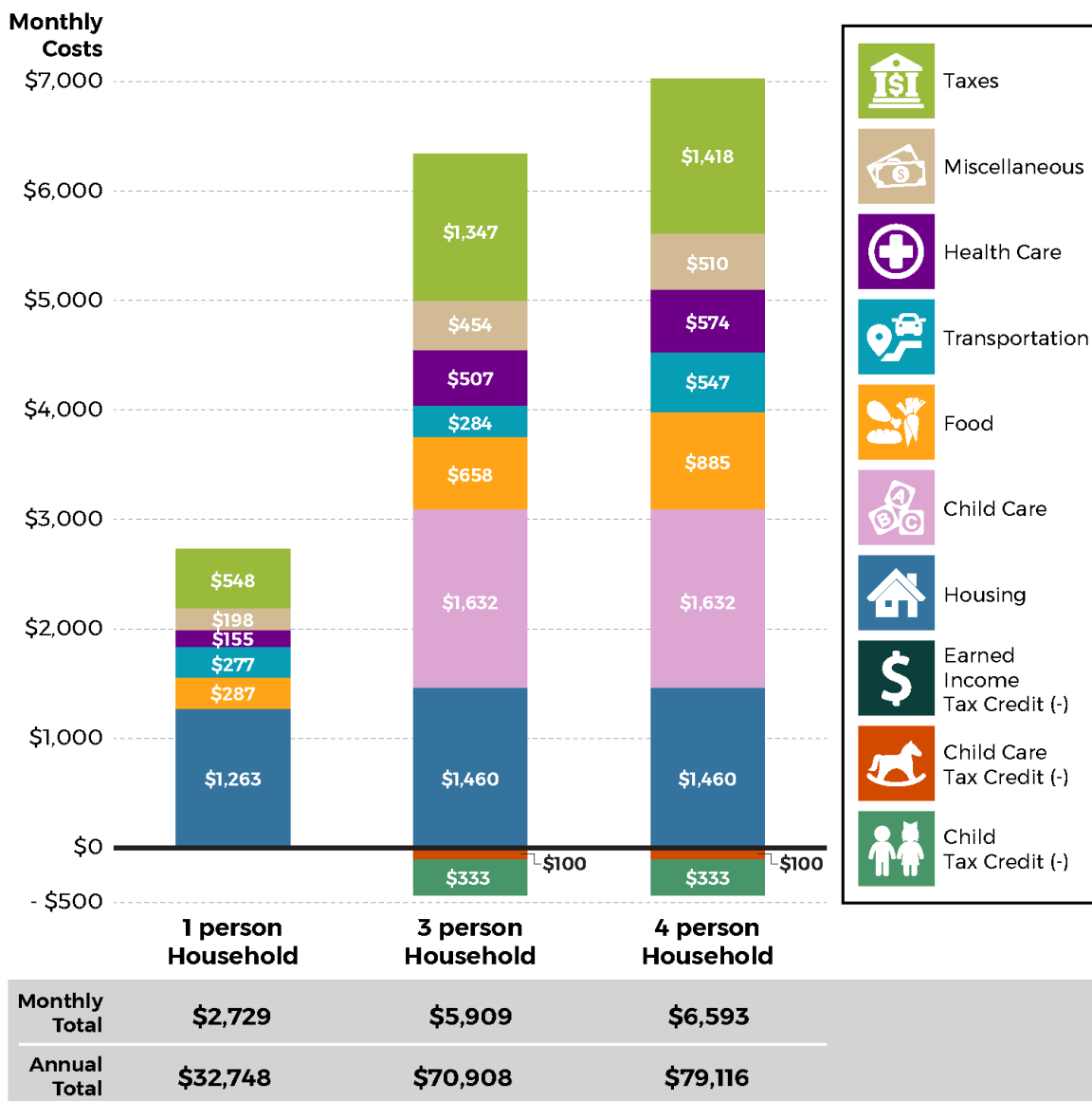
1. **Overview** of the evidence that supports further consideration of the option
2. **Key findings** regarding the engagement, analysis, and research presented in the report
3. **Considerations** of benefits, costs, and trade-offs for the Oregon Department of Transportation (ODOT) to examine and to inform decision-making
4. **Next steps** for further exploration and potential implementation of the option

8.1 Provide a significant toll discount (e.g., credits, free trips, percentage discount, or full exemption) for households with incomes equal to or below 200% Federal Poverty Level.

8.1.1 Overview

People experiencing low incomes have to make difficult daily choices to meet their basic needs (e.g. paying for food, shelter, clothing, and healthcare). A sizeable discount would help alleviate the burden of choosing between paying a toll and meeting those basic needs. This option is strongly supported by the Equity and Mobility Advisory Committee (EMAC) and by community members who participated in the focused public engagement process.

Figure 8-1. Monthly Costs Budget Comparison Graph



Source: University of Washington. 2020 and 2021. The Self-Sufficiency Standard for Oregon (<https://selfsufficiencystandard.org/oregon/>) and The Self-Sufficiency Standard for Washington (<https://selfsufficiencystandard.org/washington/>).

- Notes:
- ▲ Washington data (Clark and Skamania counties) is from 2020
 - ▲ Oregon data (Clackmas, Columbia, Multnomah, Washington, and Yamhill counties) is from 2021
 - ▲ 1 person household = 1 adult
 - ▲ 3 person household = 1 adult, 1 preschooler, 1 school age child
 - ▲ 4 person household = 2 adults, 1 preschooler, 1 school age child

8.1.2 Key Findings



EMAC supported a sizable benefit at 200% of the federal poverty level (FPL) but was divided on whether it should be a completely free option (100% discount) or one that is deeply subsidized (90%).



Findings from sensitivity testing¹⁸ for the I-205 Toll Project indicate that a 50% discount for people experiencing low incomes would increase daily traffic volume by 2% and decrease gross toll revenue by 1% compared to the Project's baseline scenario (based on the modeling analysis in 2040 conditions).

Findings from sensitivity testing for the Regional Mobility Pricing Project indicate that a smaller discount program (50% discount for all low-income trips) would increase daily traffic volume by 2% and decrease toll revenue by less than 5% compared to the baseline. A larger discount program (50% discount on all low-income trips and half of medium-income trips) would increase daily traffic volume by 4% and decrease gross toll revenue by 10% to 15% compared to the baseline.

Among the discount options, providing a monthly credit or a specific number of free trips scored the highest in the evaluation framework. A percentage discount and fixed discount scored the lowest.



The FPL is split into household/family size, ranging from 1 to 14 people. Since the FPL does not account for many household expenses and does not account for the higher cost of living in some geographic areas, low-income programs in urban areas often instead use a multiple of the FPL, such as 200% FPL instead of 100% FPL, to determine qualifications.

In 2022, the average annual income at 200% FPL is \$27,142 for a household/family size of one and \$55,500 for a household/family size of four.¹⁹

- In the Portland metro area, about 25% of the population has incomes at or below 200% of the FPL. This is lower than Oregon overall.
- The FPL is updated every year by the U.S. Census Bureau. Eligibility for the low-income toll program would therefore be updated annually. Additional work by ODOT is needed to determine eligibility updates for users who automatically enroll through other benefits programs.

Case study research shows that the 200% FPL threshold is commonly used to determine eligibility for existing low-income benefits programs in Oregon and nationally. The precedent set by these programs' use of the 200% FPL threshold shows it is an easily understood guideline as to who should qualify for low-income benefits programs. Using the same income threshold as existing low-income programs, such as the TriMet Hop Fastpass or the Free and Reduced Lunch program, may also allow ODOT to partner with other programs for verification and enrollment in the low-income toll program and could increase enrollment and reduce costs and security risk for ODOT.

¹⁸Sensitivity tests were performed using the Metro Regional Travel Demand Model to assess future year conditions (in 2040 or 2045). The modeling analyses involve several assumptions, such as 100% enrollment in the program by all who are eligible, and the income thresholds used in the model do not perfectly match the FPL used in the report options for consideration. The income thresholds used in the modeling analysis for vehicle trips are divided into three groups: low income (household income under approximately \$30,000 per year in current year dollars), medium income (household income between \$30,000 and \$125,000 per year), and high income (household income above \$125,000 per year in current year dollars).

¹⁹Assistant Secretary for Planning and Evaluation. 2022 Poverty Guidelines: 48 Contiguous States (all states except Alaska and Hawaii). <https://aspe.hhs.gov/sites/default/files/documents/4b515876c4674466423975826ac57583/Guidelines-2022.pdf>. Accessed on June 8, 2022.

8.1.3 Considerations

Among the discount options, providing a monthly credit and a specific number of free trips scored the highest in the evaluation framework. A percentage discount and fixed discount scored the lowest. The evaluation framework considered the benefits for users, costs, operational impacts, and feasibility for each identified discount option. Credits and free trips scored higher than a percent discount because these options provide a possibility that program participant accounts would not require a balance or a debit or credit card on file. These requirements can serve as major barriers to program enrollment. In addition, credits and free trips allow users to make occasional emergency or high-priority trips for free on the tolled roadway. This is of high value for those users, as even discounted trips can serve as a barrier for people experiencing low incomes.

Additional consideration is needed to understand customer service implications for each discount type. As ODOT learned during the partner engagement period, full exemptions and credits are easier to explain to potential applicants, while trip-based discounts may pose more challenges to communicate. However, there are reasons to prefer credits or free trips to full exemptions, since these approaches can cover most or all trips for most eligible corridor users, while preventing the benefit from accruing disproportionately to a small number of power users of the corridor.

Traffic and revenue might be affected differently based on whether ODOT pursues a percentage discount or credit for drivers experiencing low incomes. The traffic and revenue studies for both toll projects will refine and confirm the impacts of the low-income policy decision, including analysis of the costs to administer the low-income program and assumptions on expected participation rates. ODOT will coordinate with local equity and tolling equity specialists to conduct this work.

The option to provide a benefit through tax credits comes with specific advantages and disadvantages. Substantial further study would be required to understand whether this option would reduce administrative complexity and costs for ODOT. Tying financial relief to tax filing has some equity disadvantages, primarily that the benefit would be delayed until tax returns are filed. Furthermore, tax filings are often time consuming and complicated, and may not be required for people with low incomes, possibility resulting in low and inequitable utilization of the program.

8.1.4 Next Steps

Additional analysis and engagement is needed to assess and confirm the 200% FPL threshold, as well as to assess and identify the discount type (e.g., credits, free trips, percentage discount, tax credit, or full exemption).

8.2 Provide a Smaller, More Focused Toll Discount (i.e., credits, free trips, percentage discount, tax credit or full exemption) for Households with Incomes above 200% and up to 400% of the Federal Poverty Level.

8.2.1 Overview

Research suggests that many households with incomes above 200% FPL still struggle to meet basic needs. Providing a more focused discount would help alleviate the burden of toll expenses. Furthermore, people in this income category may experience income that fluctuates throughout the year or varies year to year. This benefit would offer some reassurance of continued benefits despite that fluctuation.

8.2.2 Key Findings



Stakeholders and project partners expressed support for tiered eligibility that reduces impacts on people just above the income threshold and accommodates the lack of schedule flexibility that some workers experience.

EMAC reviewed existing and proposed low-income toll programs and suggested that the benefits offered, such as free transponders or a \$25 annual credit, are insufficiently appealing for someone going through the enrollment process.

Stakeholders and community members support providing a benefit above 200% FPL and up to 400% FPL:

- People who responded to the April/May 2022 regional online survey support providing some benefit to a range of incomes, up to 300% FPL (see [Table 3-1](#)). Respondents generally chose a higher income threshold for eligibility (300% FPL) instead of a lower income threshold (200% FPL). The survey was developed prior to case study research and regional economic analysis that informed income threshold considerations. While survey respondents were asked about 300% FPL, the upper income limit was revised to 400% FPL to reflect the additional research findings regarding cost of living.
- EMAC reviewed a presentation on preliminary findings, and committee members expressed support for providing a sizeable benefit at 200% FPL and a smaller benefit above 200% and up to 400% FPL. EMAC also agreed that including two income ranges is worth the additional complexity so that different needs can be met.
- In response to the draft Low-Income Toll Report, members of an EMAC subcommittee agreed that 400% FPL is an appropriate maximum income threshold. Subcommittee members also suggested communicating this threshold as yearly or hourly income (as opposed to FPL) to help the public recognize program benefit eligibility.



Results from the evaluation framework analysis indicate that a multi-tier program, compared to a one-tiered program, scores the same or better for all discount options and enrollment processes.



The Oregon SSS (Self-Sufficiency Standard) and ALICE (Asset Limited, Income Constrained, Employed) provide additional data on cost of living to support considering some benefit provision for households up to 400% FPL:

- The Oregon SSS calculates how much income a family must earn to meet basic needs and is derived from the costs of housing, childcare, food, healthcare, and transportation, plus the cost of taxes and impacts of 2021 tax credits.¹³ In 2021, the Oregon SSS, average across the state of Oregon was \$31,521 (245% FPL) for a household/family size of one and \$82,447 (311% FPL) for a household/family size of four. The Oregon SSS average for the seven counties that comprise the Portland metro area is higher, at \$32,743 (254% of FPL) for a household of one and \$86,220 (325% of FPL) for a household of four.
- The ALICE Threshold for Survival estimates a more constrained household budget that represents the bare minimum for families to make ends meet. As a multiple of FPL, the threshold for survival varies greatly depending on household size. Averaged across Oregon, the Household Survival Budget is \$25,380 (200% FPL) for a household of one and \$75,768 (286% FPL) for a household of four.
- The ALICE Household Stability Budget estimates the higher costs of maintaining a viable household over time, including a 10% savings category that can be used in an emergency, for additional education, or to buy a home.²⁰ In 2018, the most recent data year, the ALICE was \$51,216 (398% FPL) for a household/family size of one and \$118,896 (449% FPL) for a household/family size of four.
- In 2022, the average annual income at 400% FPL is \$54,360 for a household/family size of one and \$111,000 for a household/family size of four.²¹ In the Portland region, about 29% of people have incomes from above 200% FPL up to 400% FPL.²²

²⁰<https://www.unitedforalice.org/household-budgets-mobile/oregon>

²¹Assistant Secretary for Planning and Evaluation. 2022 Poverty Guidelines: 48 Contiguous States (all states except Alaska and Hawaii). <https://aspe.hhs.gov/sites/default/files/documents/4b515876c4674466423975826ac57583/Guidelines-2022.pdf>. Accessed on June 8, 2022.

²²U.S. Census Bureau, American Community Survey, 2015 to 2019. S1701 Poverty Status in the Past 12 Months.

8.2.3 Considerations

The eligibility requirements and benefits of a multi-tier program are more nuanced and complicated than for a one-tier program. It may be necessary to determine a separate communication strategy to inform potential applicants about which benefits they are eligible for. Depending on geographic eligibility, ODOT may need to involve agencies outside of the Portland metro area in the messaging campaign to help people experiencing low incomes access the program statewide.

Results from the evaluation framework analysis indicate that a multi-tier program scores the same or better than a one-tier program for all discount options and enrollment processes.

8.2.4 Next Steps

Research and engagement strongly supports providing a multi-tier benefit that includes more than one income threshold. However, additional work is needed to determine the income thresholds for the tiers, particularly the second tier that includes the higher (up to 400% FPL) income threshold.



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Research and engagement strongly supports providing a multi-tier benefit that includes more than one income threshold.

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8.3 Use a Verification Process that Leverages Existing Programs and Further Explore Self-Certification to Qualify for Program Enrollment (or Toll Discounts)

8.3.1 Overview

ODOT has heard consistently from EMAC, stakeholders, and community members that enrollment is a priority. Enrollment and/or verification through existing low-income service programs and/or utilizing self-certification would improve the ease of enrollment for applicants. Additionally, these options may reduce ODOT's enrollment administrative cost burden and data privacy risk.

Self-certification would allow applicants to certify their income level without substantiating documents. Applicants may be asked to check a box on the application that says, "I verify that the income I selected is true." The process may require applicants to agree to provide proof of income if requested in the future.²³ Some self-certification methods may include penalties for misstating or falsifying information, although including such a statement on the application can be difficult to follow through on and can serve as an enrollment barrier.

Leveraging existing programs would allow participants to verify their income through enrollment in other programs. For example, partnering with the Integrated Oregon Eligibility Program (Integrated ONE) may alleviate some enrollment administrative burdens of partnering with numerous programs while providing comprehensive coverage of existing programs. Another option raised by stakeholders during the partner engagement period is automatic enrollment for those already enrolled in an existing low-income service program. This option has the potential to greatly increase enrollment in the low-income toll program; however, it poses many questions and challenges.

²³For a self-certification example see https://www.taptogo.net/LIFE_Application_step1.

8.3.2 Key Findings



EMAC and community partners strongly support a self-certification model that streamlines the low-income toll program benefit enrollment process.



The evaluation framework, discount options with self-certification all received more favorable scores than those with confirmed eligibility.

The proposed low-income toll program has several innate features that make it an unlikely target of systemic fraud, including:

- Benefits cannot be cashed out, because they can only be used for travel on the toll corridors.
- Use of the benefit is limited to specific toll roads only, users would have to live in or travel through the project area.
- Benefits are administered on a small scale, with each person only receiving one instance of the benefit at a time.
- If the benefit takes the form of a credit or a number of free trips, it is limited by design because the value can only be either a certain dollar credit or a set number of free trips—users cannot receive a benefit beyond those set boundaries. Additionally, because the benefit value would be lower (because it is bounded), the incentive to commit fraud is lower.



Enrollment in the two existing low-income toll programs, presented as case studies in Chapter 6, is estimated at less than 10% of the people eligible. Across the United States, enrollment in low-income programs generally does not exceed 60% of eligible individuals. Possible benefits of qualification through existing low-income service program(s) and self-certification, as well as possibly automatic enrollment, include improving the ease of enrollment for travelers, which addresses an enrollment barrier that could contribute to low utilization of program benefits. Another possible benefit includes eliminating or reducing the need for ODOT to collect or process sensitive information.²⁴

An enrollment process that takes time and is complicated will very likely deter people experiencing low incomes. In general, people with lower incomes have tighter time constraints than those with higher incomes due to possible combinations of holding multiple jobs, less flexible hours, needing daily time to spend on budgeting, and the inability to pay to help outsource home and family tasks. These are all common possibilities for why people with low incomes tend to have less time to figure out a complicated enrollment process.

ODOT conducted research to identify rates of fraud among self-certification programs as well as low-income service programs more broadly. No reports of large-scale fraud among comparable programs, including ones with self-certification, were identified.

²⁴https://pdxscholar.library.pdx.edu/cgi/viewcontent.cgi?article=1008&context=ncpp_pub; https://www.commonwealthfund.org/sites/default/files/documents/___media_files_publications_fund_report_2009_may_1266_summer_increasing_particip_benefit_progs_v3.pdf

8.3.3 Considerations

Automatic enrollment through other programs would lead to increased enrollment and usage, but would also present its own operational challenges and costs, including the challenge of mapping existing transponder account holders to service program participants.

To pursue automatic enrollment through other low-income benefit programs, ODOT would need to identify programs that use the same or lower income-thresholds and consider compatibility with ODOT's back office. The Integrated Oregon Eligibility Program (Integrated ONE) allows eligible applicants to apply and enroll in a number of social and health services programs, such as the Oregon Health Plan, Supplemental Nutrition Assistance Program (SNAP or food stamps), and Temporary Assistance to Needy Families (TANF). Partnering with Integrated ONE may alleviate some enrollment administrative burdens of partnering with numerous programs while providing comprehensive coverage of existing programs in Oregon.

If considering self-certification, additional research would be needed to understand the potential risk and impact of program fraud, as well as to understand the efficacy and trade-offs of fraud prevention strategies. As recommended during the partner engagement period, ODOT could consider ongoing income-verification checks for either heavy users of the program or for randomly selected individuals.

Verifying incomes can be costly and time consuming and poses an added data security risk associated with collecting sensitive information, such as social security numbers and income. Additional research will be useful to help understand privacy concerns and administrative costs of income verification. In addition, ODOT will need to evaluate potential revenue leakage associated with self-certification.

ODOT will need to coordinate with the Washington State Department of Transportation to ensure the certification

model(s) decided upon is accessible for Washington residents who wish to register for an account and access the benefit.

Without self-certification, a third-party employee or contractor affiliated with the low-income toll program would have to either confirm applicants' enrollment in the relevant service program or verify income for those not enrolled in other service programs or for benefits with thresholds higher than 200% FPL.

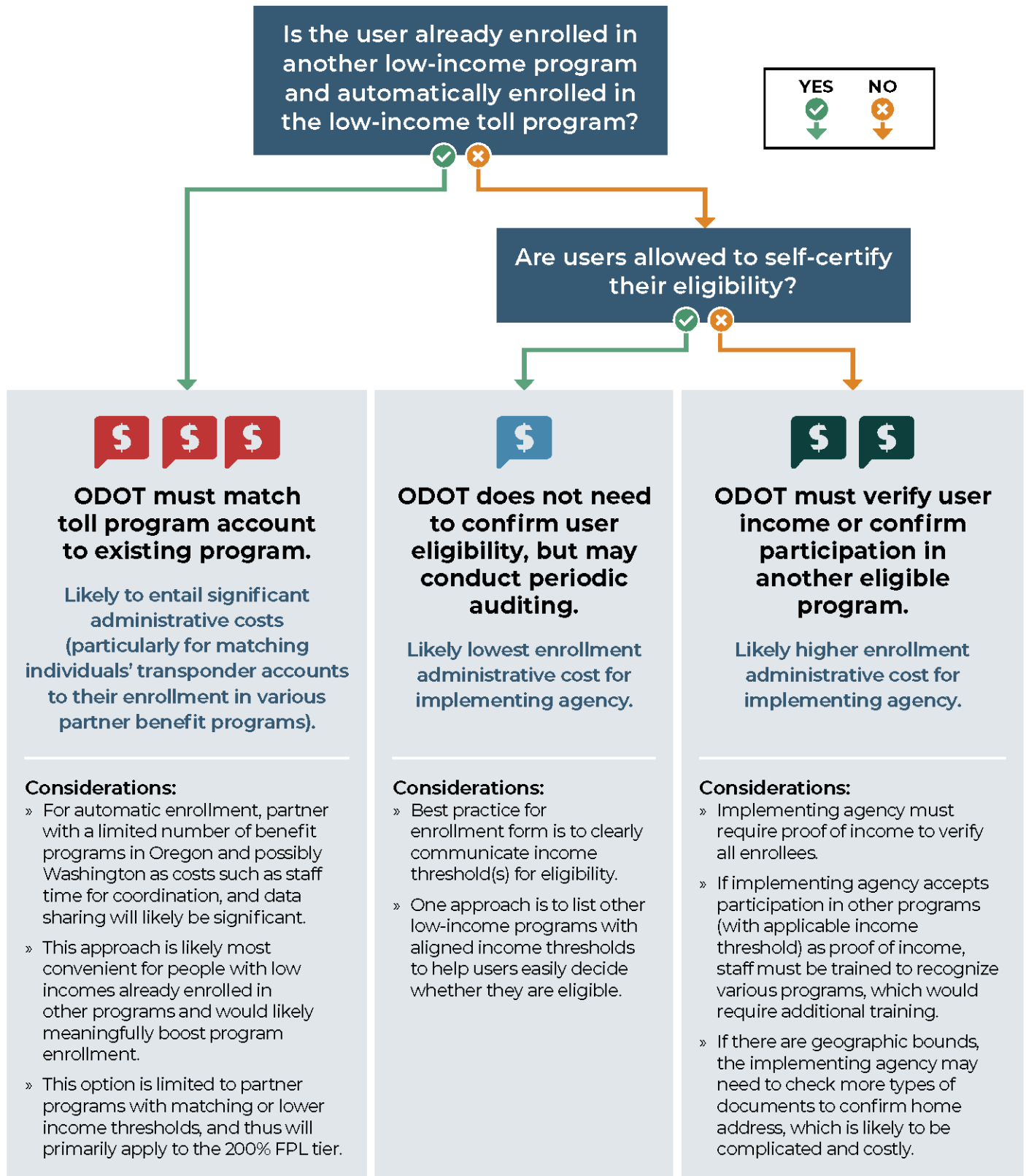
The eligibility cost considerations shown in **Figure 8-2** illustrates the relationship between decisions related to automatic enrollment and self-certification to enrollment administrative costs and a possible approach to partnerships with existing benefit programs.

8.3.4 Next Steps

Further research is needed to understand the administrative costs of income verification to inform decisions on self-certification and verification through other programs. The Virginia Department of Transportation found that the cost of income verification is a sizable share of overall program costs for their low-income toll program.

Further analysis and consideration is needed to understand the costs and benefits of automatic enrollment through participation in other low-income benefits programs. In particular, the administrative process and costs may have implications for the traffic and revenue analyses and will need to be analyzed further. ODOT will have to determine whether automatic enrollment provides a notification to the user that they are invited to enroll in the low-income toll program or whether an account will it automatically be created for them—and furthermore whether a transponder will be automatically sent to the enrollee. The cost and complexity of this option depends on these decisions. ODOT will also need to work with stakeholders and other agencies to identify existing programs where automatic enrollment may be compatible.

Figure 8-2. Eligibility Cost Considerations



ODOT must match toll program account to existing program.

Likely to entail significant administrative costs (particularly for matching individuals' transponder accounts to their enrollment in various partner benefit programs).

Considerations:

- » For automatic enrollment, partner with a limited number of benefit programs in Oregon and possibly Washington as costs such as staff time for coordination, and data sharing will likely be significant.
- » This approach is likely most convenient for people with low incomes already enrolled in other programs and would likely meaningfully boost program enrollment.
- » This option is limited to partner programs with matching or lower income thresholds, and thus will primarily apply to the 200% FPL tier.

ODOT does not need to confirm user eligibility, but may conduct periodic auditing.

Likely lowest enrollment administrative cost for implementing agency.

Considerations:

- » Best practice for enrollment form is to clearly communicate income threshold(s) for eligibility.
- » One approach is to list other low-income programs with aligned income thresholds to help users easily decide whether they are eligible.

ODOT must verify user income or confirm participation in another eligible program.

Likely higher enrollment administrative cost for implementing agency.

Considerations:

- » Implementing agency must require proof of income to verify all enrollees.
- » If implementing agency accepts participation in other programs (with applicable income threshold) as proof of income, staff must be trained to recognize various programs, which would require additional training.
- » If there are geographic bounds, the implementing agency may need to check more types of documents to confirm home address, which is likely to be complicated and costly.

Chapter 9: Next Steps and Implementation Practices

This chapter provides an overview of the next steps toward development and eventual implementation of a low-income toll program. It describes the milestones and corresponding timelines that will guide program development. It also presents best practices for implementation that Oregon Department of Transportation (ODOT) and the Oregon Transportation Commission (OTC) will consider as they develop the low-income toll program.

The Low-Income Toll Report reflects a major milestone towards delivery of the low-income toll program. The report explores options for the discount type and income threshold as well as best practices for implementation of an equitable, inclusive Toll Program. After submittal of the report, ODOT, in collaboration with the OTC and in consultation with the Equity and Mobility Advisory Committee (EMAC), will continue analysis, research, and engagement to refine the options for consideration and select the implementation practices that advance equity and are cost effective.

9.1 Next Steps

The next year and a half are critical to establishing a successful low-income toll program that is ready before tolling begins. Between fall 2022 and the end of 2023, the Statewide Toll Rule Advisory Committee (STRAC) will review changes to Oregon Administrative Rules and provide feedback to ODOT on the process to set toll rates; the back-office system configuration will occur concurrently. Both work streams will feed into OTC toll rate setting and rulemaking, which will conclude in mid-2024 with the adoption of toll rates and rules for the I-205 Toll Project. Throughout this time frame, the low-income toll program will be built-out through an iterative process that involves a variety of program milestones. These milestones are presented in below and categorized into the following work efforts:

- Traffic and revenue studies for the I-205 Toll Project and Regional Mobility Pricing Project
- Rulemaking and toll rate setting process
- Back-office system configuration and operations management
- EMAC and engagement
- Oregon Highway Plan (OHP) amendment and statewide policy
- Monitoring and adjustments after implementation



9.1.1 Traffic and Revenue Studies

During the engagement period, project partners raised questions about whether the low-income toll program would undermine congestion management goals for the toll projects on I-5 and I-205. Preliminary analysis indicates that the low-income discount or credit program would have minimal impacts. However, current analysis incorporates simplified assumptions and more effort is needed to study the precise options for consideration presented in this report.

Through the traffic and revenue studies for the I-205 Toll Project and Regional Mobility Pricing Project, ODOT will analyze discount and income threshold options by studying how different options could change the base traffic and revenue forecasts. The analysis will require both modeling and off-model spreadsheet calculations and may require demographic data and additional assumptions. A methodology will be developed to define those assumptions, including the expected percentage of eligible customers that would enroll and how frequently they travel. The modeled enrollment figure will be researched and estimated based on the benefit level being modeled (e.g., higher benefits lead to greater enrollment), the ease of enrolling in the program, transponder balance and credit card requirements, enrollment in comparable regional benefit programs, and outreach or survey results. Lastly, the traffic and revenue studies will consider revenue leakage associated with the low-income toll program, if any, with special consideration towards self-certification and/or the offering of a full exemption.

🕒 **Timing:** The traffic and revenue studies involve three levels of analysis with increasing rigor, time and costs. The Final Traffic and Revenue Study is expected to be available in 2024 for the I-205 Toll Project and in 2025 for the Regional Mobility Pricing Project.

9.1.2 Rulemaking and Toll Rate Setting

The STRAC will review and recommend updates to modernize toll-related rules, align them with legislative direction, and add needed clarity for toll operations, including customer interaction with the toll system. It will also provide a recommendation to ODOT on the process for setting toll rates by way of rulemaking. Upon receiving the STRAC's recommendation, ODOT will begin an iterative, 6-month process with the OTC to refine toll rates and rules. The process will conclude with the OTC adopting toll rates and rules, including rates with income-based adjustments and rules that apply to the low-income toll program.

🕒 **Timing:** The STRAC will be established in late 2022 and will develop recommendations through the end of 2023. The OTC will adopt toll rates and rules in mid-2024.

9.1.3 Back-Office System Configuration and Operations Management

The back-office system can be designed to offer a range of discount or credit programs and eligibility rules for people experiencing low incomes to gain access to the discount or credit program. Whatever discount type and income threshold are decided upon will be built into the back-office system before tolling begins. Wherever possible, the Toll Program will look for opportunities to streamline implementation and operations. ODOT will continue to explore self-certification and partnerships with other programs for verification and potentially automatic enrollment. If it is not possible to determine eligibility through existing programs or solely through self-certification, ODOT will need to identify a third-party verification vendor.

A critical component of building out the low-income toll program is defining geographic eligibility and working with community members and project partners in southwest Washington. During engagement on the report, project partners and EMAC asked questions and expressed concerns about how people experiencing low incomes from outside the Portland region would be affected by tolling. While there are advantages and disadvantages to limiting geographic eligibility, defining geographic eligibility may be unnecessary because access to the discount will require an account and infrequent users from outside the Portland metro area are unlikely to register. Another consideration is transactional costs: allowing eligible applicants who live outside Oregon and southwest Washington to enroll may be less costly than verifying the address of every applicant. Further research and engagement, including interaction with other toll programs in Washington in particular, is needed to define geographic eligibility.

Many of the implementation practices described in Section 9.2 are applicable to back-office system configuration and operations management. These include implementation practices related to transponders and account maintenance, a cash-based option, enrollment, compliance, and penalties. Operations management specialists will advise on the costs to implement these best practices, and ODOT will work with EMAC and community partners to continue analyzing and prioritizing best practices for people experiencing low incomes.

🕒 **Timing:** The back-office system configuration will occur from fall 2022 to the end of 2023, in parallel with the STRAC rulemaking and toll rate setting process.

9.1.4 EMAC and Public Engagement

EMAC's mission is to partner with ODOT to implement the Oregon Toll Program's Equity Framework at each stage of project development. Following the receipt of ODOT's support and guidance for next steps, EMAC will continue to provide input on new and bold ways to address equity in the I-205 Toll Project and Regional Mobility Pricing Project.

Public and partner engagement will continue as part of the environmental review phase for the Regional Mobility Pricing Project and I-205 Toll Project. ODOT and the OTC will invite ongoing input from stakeholders and the public to continue to inform low-income toll program development, including final selection of the discount type and income threshold.

- 🕒 **Timing:** EMAC will continue meeting and providing feedback to ODOT and the OTC from fall 2022 through 2023. Partner and public engagement for the I-205 Toll Project and Regional Mobility Pricing Project is ongoing and will occur through the completion of the environmental review processes for both projects.

9.1.5 Oregon Highway Plan Amendment and Statewide Policy

ODOT is currently amending the OHP to provide clarity around pricing and tolling to recognize new opportunities and support implementation. Policy updates are also needed to address evolving equity, climate, safety, modernization, and funding goals. As ODOT undergoes the OHP amendment process, it will ensure the updates support the low-income toll program. In addition, ODOT will monitor and update statewide policy, as needed, to support advancement and implementation of the options and best practices presented in this report.

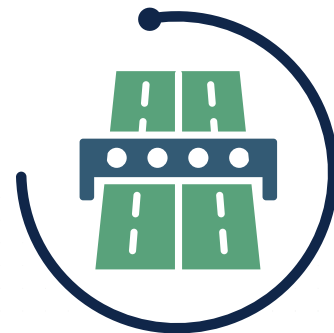
- 🕒 **Timing:** ODOT anticipates that the OTC will adopt the OHP amendment in late fall 2022 to inform the rulemaking and rate setting process.



9.1.6 Monitoring and Adjustments after Implementation

After the low-income toll program is implemented, program performance will be reviewed through ongoing traffic and revenue monitoring, engagement with eligible program participants, and partnerships with community-based organizations. Programmatic review may include adjusting the program if it does not adequately meet equity and project goals, improving customer service, and/or identifying opportunities to increase enrollment. Experience from Virginia's program shows that a steering committee or equity panel for programmatic review can help people experiencing low incomes shape the program on an ongoing basis. Additionally, in July 2022 OTC accepted EMAC's recommended actions, which included continued support for a toll equity accountability committee (or another structure) that provides a forum for equity voices to monitor, evaluate, and provide feedback on enrollment in and economic impacts of the low-income toll program over time.

- 🕒 **Timing:** Monitoring would begin in coordination with the start of tolling, which is planned for 2024 for the I-205 Toll Project and 2025 for the Regional Mobility Pricing Project.



9.2 Implementation Practices

This section discusses the best practices to consider when implementing the low-income toll program. Relevant examples from other low-income programs are provided as appropriate. These best practices include the following:

- ➔ Transponders and account maintenance
- ➔ Provide a cash-based payment option
- ➔ Program communications and outreach
- ➔ Develop an inclusive enrollment process
- ➔ Develop monitoring, review, and adjustment process
- ➔ Prevent debt and criminal penalties

9.2.1 Transponders and Account Maintenance

Provide free transponders and work with community-based organizations to help enroll people. Do not require a minimum dollar amount of balance to load or maintain the transponder account.

ODOT currently plans to issue transponders to all users free of charge. While stakeholder feedback indicates that a transponder credit may be an insufficient benefit on its own, it can be a complementary program component to support program enrollment. Additionally, stakeholders support measures to address enrollment barriers.

Transponder installation could be coupled with Department of Environmental Quality vehicle testing processes. For example, a driver who brings their car in for a smog check could get a toll transponder installed in the same visit. Members of an EMAC subcommittee emphasized the importance of easy access to transponders by making them available at local retail locations (such as grocery and convenience stores), as well as dispensing them through community-based organizations.

Having no minimum balance requirements would alleviate additional burdens for people experiencing low incomes, but it also would raise invoicing costs, which leads to leakage. If having no minimum balance requirement is not feasible, explore a low balance requirement, such as \$5 (TriMet's minimum load value).

Case Study:

The LA Metro Low Income Assistance Plan allows credits to be applied to the cost of the transponder and waives the \$1 monthly account maintenance fee, recognizing that transponder purchase costs can be a barrier for corridor users experiencing low incomes.

Case Study:

The Virginia Department of Transportation Toll Relief Program dropped the minimum balance on the transponder from \$35 to \$20.

9.2.2 Provide a Cash-Based Payment Option

Provide a cash-based option for toll payment in order to engage potential applicants who are unbanked.

Some individuals do not have a bank account or prefer to use alternative financial services. Others would prefer not to share banking information with a government agency. Providing a cash-based option to load transponders addresses these concerns and is supported by stakeholders. Ideally, cash loading should occur in local communities (e.g., at local stores) and should not have surcharges. ODOT is already considering this option for the toll program overall.

9.2.3 Program Communications and Outreach

Conduct extensive marketing, promotion, and engagement with community-based organizations that starts at least 6 months before tolling begins. Post signage so that travelers can make informed decisions.

Feedback from EMAC, low-income discussion groups, social service providers, and community organizations all recommend selecting the low-income toll benefit and enrolling people in the program before tolling begins. ODOT will need to consider the timeline for program decision-making, marketing, and outreach.

A benefit of scheduled variable-rate pricing is the ability for drivers to know the toll rate before they travel. Signage communicating rates facilitates predictability and transparency.



9.2.4 Develop an Inclusive Enrollment Process

Create an in-person and online enrollment process that is accommodates participants with disabilities, who have limited technology access or training, who speak languages other than English, and who live far away from existing customer service centers.

The Portland region is a diverse place with people of many abilities and with varying degrees of access to technology. Online resources, such as a website and mobile app, can reach a wide audience. But for those with limited technology access or training, stakeholders support offering an in-person option to provide an inclusive and accessible customer service experience. This can serve as a test bed to see if that would be successful in the statewide program.

Partnering with Oregon Driver and Motor Vehicle Services (DMV) or other social services sites could help enroll users living within and outside the Portland metro area in the low-income toll program. ODOT is already considering stationing customer service representatives at DMVs. Other potential channels include payment platforms like PayNearMe and InComm.

All enrollment options should be compliant with the American with Disabilities Act, accessible by multiple forms of transportation, and open for longer hours. Application materials should be available in multiple languages.

Case Study:

TriMet allows Hop card holders to load money on their accounts at local grocery and convenience stores.

Case Study:

LA Metro's LIFE program encourages enrollment by allowing in-person registration at pop-up locations and community fairs.

9.2.5 Develop Monitoring, Review, and Adjustment Process

Support a monitoring, review, and adjustment process for the low-income toll program that includes community voices and a process that is aligned with the Oregon Toll Program's Equity Framework.

Ongoing engagement and consultation with historically underrepresented and underserved communities in program monitoring, reporting, and programmatic changes facilitates building community understanding, capacity, trust, and support. It can also help planners and policymakers interpret data in local context and make more informed decisions for the low-income toll program. This best practice would be applied as part of customer/user engagement. Experience from the Virginia Department of Transportation indicates that a steering committee or equity panel can help people experiencing low incomes continue to shape the program on an ongoing basis.

9.2.6 Prevent Debt and Criminal Penalties

Offer education opportunities, additional time to pay toll charges, multiple notices of account balances, or set a maximum penalty amount.

Tolling should not contribute to more financial indebtedness for people experiencing low incomes, nor should it lead to criminal penalties. The existing rules for failure to pay tolls are established in Oregon law (ORS 383) and rules (731-040-0064). ODOT will need to consider the timeline, process, and consistency for defining a waiver of fines or penalties in rule. EMAC members support a programmatic emphasis on accessibility rather than punitive enforcement. For program administration, ODOT should consider applying the same rules to all accounts within the low-income toll program.

9.2.7 Develop an Equitable Operation and Implementation Plan

Work with the toll implementation team to develop a concept of operations for the low-income toll program that includes the schematic process for penalties that users are subject to for toll violations (i.e. initial penalty followed by a failure to comply penalty).

More work is needed to develop an operational design and implementation plan establishing the program details, specific policies, and technical system requirements that will enable more precise analysis and estimation of long-term program costs and impacts on toll revenues and performance. The concept of operations should include the schematic process for penalties that users are subject to for toll violations (i.e., initial penalty followed by a failure to comply penalty).



Appendix:

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A: Low-Income Benefit Programs and Thresholds



A.1 Federal Programs

The U.S. Department of Agriculture's Supplemental Nutrition Assistance Program (SNAP) provides food benefits to low-income households based on household size. As shown in Table A 1, the income thresholds for eligibility are calculated based on a maximum income of \$16,744 for a one-person household and an additional \$5,902 for each additional person in the household. In addition, the applicant must have a current bank balance (savings and checking combined) under \$2,001 or have a current bank balance under \$3,001 and share their household with either a person aged 60 and over or a person with a disability.

Table A-1. Annual Household Income Limits (Before Taxes)

Household Size ^[1]	Maximum Income Level (Per Year)
1	\$16,744
2	\$22,646
3	\$28,548
4	\$34,450
5	\$40,352
6	\$46,254
7	\$52,156
8	\$58,058

Source: U.S. Department of Agriculture's Supplemental Nutrition Program (SNAP) for Oregon. <https://www.benefits.gov/benefit/1332>.

^[1]For households with more than eight people, add \$5,902 per additional person. Always check with the appropriate managing agency to ensure the most accurate guidelines.

The U.S. Department of Health and Human Services' Poverty Guidelines for 2022 are as shown in Table A 2. The guidelines are calculated based on an income of \$13,590 for a one-person household and an additional \$4,720 for each additional person in the household. These guidelines are used by programs (directly or percentage multiples) such as Head Start, SNAP, the National School Lunch Program, the Low-Income Home Energy Assistance Program, and the Children's Health Insurance Program.

Table A-2. Poverty Guidelines for 2022

Persons in Family/Household ^{¶1}	Poverty Guideline
1	\$13,590
2	\$18,310
3	\$23,030
4	\$27,750
5	\$32,470
6	\$37,190
7	\$41,910
8	\$46,630

Source: 2022 Poverty Guidelines for the 48 Contiguous States and the District of Columbia, from the Office of the Assistant Secretary for Planning and Evaluation, U.S. Federal Poverty Guidelines used to determine financial eligibility for certain programs. <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>.

^{¶1}For families/households with more than 8 persons, add \$4,720 for each additional person

A.2 Local, Regional, and State Programs

This section provides summaries of relevant low-income programs that have been implemented by states, cities, and regional agencies.

OREGON HOUSING AND COMMUNITY SERVICES PROGRAMS

Oregon Housing and Community Services offers two programs that help low-income households with utility payments: Low-Income Home Energy Assistance Program and Oregon Energy Assistance Program. Households with incomes below 60% of Oregon's median income are eligible, based on household income and household size.

OREGON TRAIL CARD – ELECTRONIC BENEFITS TRANSFER (EBT) CARD

The Oregon Trail Card used for state benefits include SNAP food benefits and Temporary Assistance for Needy Families (TANF) cash benefits. Benefits are deposited into the account each month, and the card functions like a debit card.

For families and single adults without a disability, eligibility for SNAP food benefits can be determined via 65 Oregon Department of Human Services Self-Sufficiency offices in the state (examples for different family types are provided in [Figure A-1](#)). For seniors and people living with disabilities, eligibility is determined via 76 Oregon Department of Human Services Aging and People with Disabilities and Area Agency on Aging offices in the state. Applications may be emailed or dropped off in person, mailed, or faxed to the appropriate office.

TANF is available for people who live in Oregon, experience low income and have very few assets, and are either 18 or younger and head of their household, are pregnant, or have a child who is 18 or younger. Eligibility is determined via 65 Oregon Department of Human Services Self-Sufficiency offices in the state (examples for Oregon counties are provided in [Figure A-2](#)). Applications may be emailed or dropped off in person, mailed, or faxed to the appropriate office. People who qualify for TANF are also eligible for employment and training via Oregon's Jobs Opportunity and Basic Skills (JOBS) program.

UTILITY BILL PAYMENT ASSISTANCE (OREGON)

Oregon Housing and Community Services offers two programs that help low-income households with utility payments: Low-Income Home Energy Assistance Program and Oregon Energy Assistance Program. The Low-Income Home Energy Assistance Program helps participants with energy expenses and may help repair or replace heating systems as well as improve household energy efficiency through the Weatherization Program. Oregon Energy Assistance Program assists households at risk of losing electricity access. Both programs are administered by Community Action Agencies with Oregon Housing and Community Services funding; each of Oregon's 36 counties has a Community Action Agency. Households with incomes below 60% of Oregon's median income are eligible, based on household income and household size. Both renters and owners are eligible, but benefit levels may vary for renters based on rental or utility agreements and landlord cooperation.

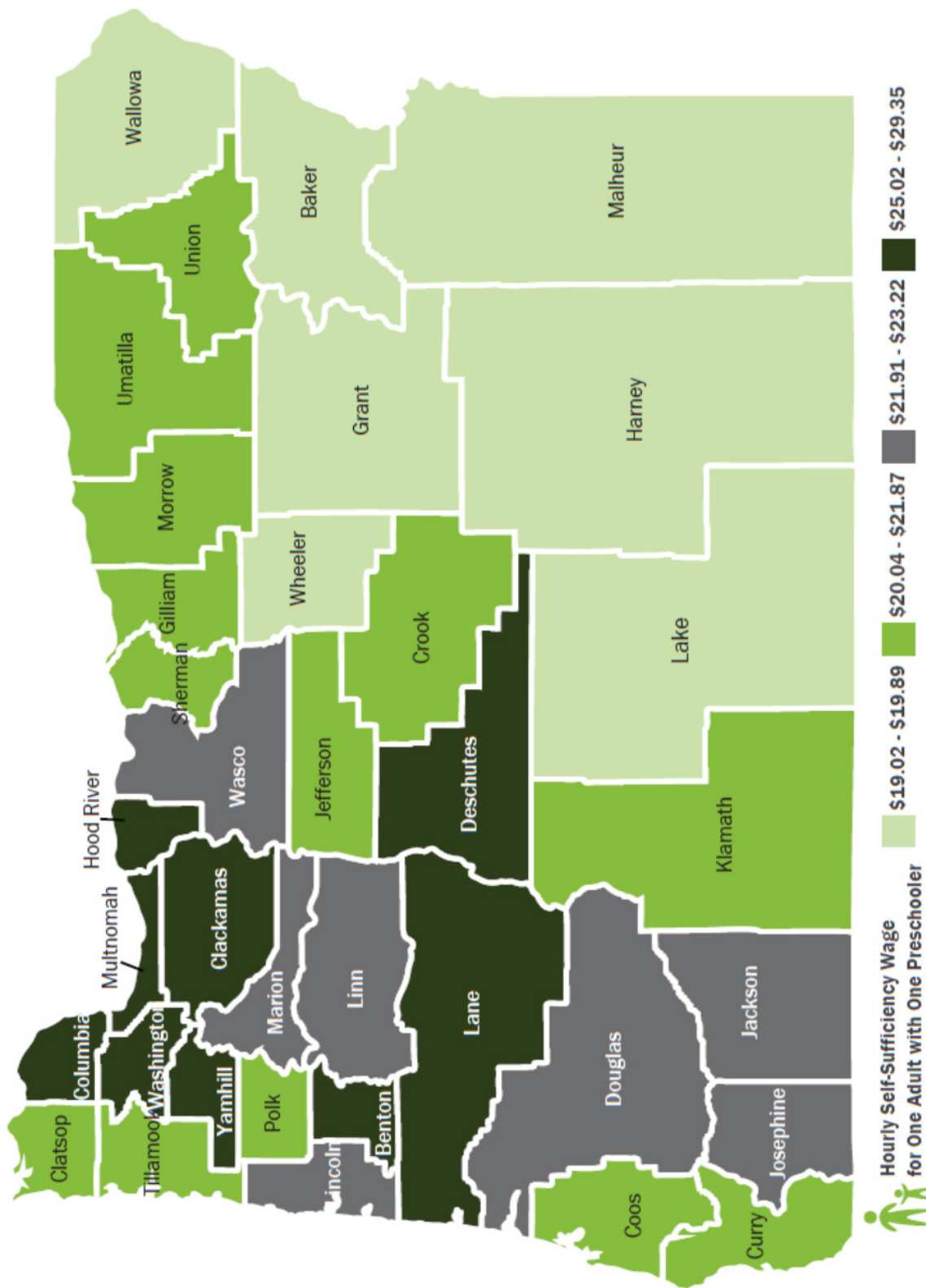
**Figure A-1. The Self-Sufficiency Standard for Select Family Types
(Multnomah County, Oregon 2021)**

	1 ADULT	1 ADULT 1 PRESCHOOLER	1 ADULT 1 PRESCHOOLER 1 SCHOOL-AGE	2 ADULTS 1 PRESCHOOLER 1 SCHOOL-AGE
MONTHLY COSTS				
Housing	\$1,327	\$1,531	\$1,531	\$1,531
Child Care	\$0	\$1,258	\$2,081	\$2,081
Food	\$306	\$463	\$701	\$942
Transportation	\$100	\$100	\$100	\$200
Health Care Net	\$168	\$536	\$574	\$647
Premium	\$95	\$444	\$444	\$444
Out-of-Pocket	\$73	\$92	\$130	\$203
Miscellaneous	\$190	\$389	\$499	\$540
Taxes (Net)	\$535	\$793	\$924	\$930
Federal Income Taxes	\$173	\$397	\$590	\$540
Payroll Taxes	\$204	\$393	\$497	\$532
State Income Taxes	\$159	\$304	\$387	\$407
Federal Child Tax Credit (-)	\$0	(\$300)	(\$550)	(\$550)
SELF-SUFFICIENCY WAGE				
Hourly**	\$14.92	\$28.81	\$36.42	\$19.52 (per adult)
Monthly	\$2,627	\$5,070	\$6,409	\$6,871
Annual	\$31,521	\$60,846	\$76,912	\$82,447
Emergency Savings Fund	\$33	\$119	\$265	\$65
TOTAL RESOURCES (YEARLY)				
Federal & Oregon Earned Income Tax Credit (EITC)	\$0	\$0	\$0	\$0
Federal Child and Dependent Care Tax Credit (CDCTC)	\$0	\$4,000	\$8,000	\$8,000
Oregon Working Family Household and Dependent Care Credit (WFHDC)	\$0	\$0	\$0	\$0
Net Resources	\$31,521	\$64,846	\$84,912	\$90,447

* The Standard is calculated by adding expenses and taxes and subtracting tax credits.

** The hourly wage is calculated by dividing the monthly wage by 176 hours (8 hours per day times 22 days per month). The hourly wage for families with two adults represents the hourly wage that each adult would need to earn, while the monthly and annual wages represent both parents' wages combined. Note: Totals may not add exactly due to rounding.

Figure A-2. Counties by Level of Hourly Self-Sufficiency: One Adult and One Preschooler (Oregon 2021)



PORTLAND TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) LOW-INCOME FARE PROGRAM

Seniors aged 65+, people on Medicare, people with a disability, and people experiencing low incomes, termed Honored Citizens, are eligible for 50% to 72% less than Adult fare. Discounts apply to rides on buses, MAX, WES, Portland Streetcar, and C-TRAN. An ID is required for proof of eligibility upon boarding. After spending \$2.50 in a day or \$28 in a calendar month, Honored Citizens may ride for free. Payment options for Honored Citizen fares include a paper Hop ticket available at MAX/WES stations, a virtual Hop card in the Hop app, or a physical Hop card that can be bought (\$3 for a card) and reloaded (via Hop website, app, or phone hotline) at more than 500 local retailers including supermarkets, pharmacies, and convenience stores. Physical Hop cards do not require a bank account, credit card, smartphone, or Internet access. Honored Citizen discounts are not available through the mobile wallet or physical bankcard (direct tapped on Hop readers) options. **Table A-3** provides a program summary.

Table A-3. Portland Tri-County Metropolitan Transportation District of Oregon (TriMet) Low-Income Fare Program

Program Category/ Enrollment Requirement	Program Details
Facility Type	Mass Transit Fair
Tiered Benefits?	No
Program Features	<ul style="list-style-type: none"> ▶ Low-income users receive discounts of 50% to 72% off the adult fare, depending upon whether fares are for single ride, day pass, or monthly pass. ▶ Users automatically qualify with enrollment in Oregon Health Plan, SNAP, Energy Assistance, Free/Reduced Lunch, HUD Assistance, TANF, or Employment DayCare
Income Requirements	200% FPL or below.
Proof of Income	WorkSource employment/wage verification, Current IRS transcript, W2 form from the most recent tax year, signed copy of federal tax return, or unemployment benefit letter and current weekly pay stub.
Residence Requirements	Oregon State
Proof of Residence	Valid government-issued ID
Enrollment Method	Online application, req. document upload and video enrollment call. Hop cards must be picked up in person at the TriMet Ticket Office at Pioneer Courthouse Square. ^[1]

^[1] <https://trimet.org/lowincome/>

KING COUNTY METRO SUBSIDIZED/REDUCED TRANSIT FARE (WASHINGTON)

Table A-4 provides a program summary of this low-income transit program implemented by King County, Washington.

Table A-4. King County Metro Subsidized/Reduced Transit Fare

Program Category/ Enrollment Requirement	Program Details	
Facility Type	Mass Transit Fair	
Tiered Benefits?	Yes	
Program Features	Subsidized annual pass, ^[1] which allows free (\$0) fare for select road-based transit services (King County Metro buses, RapidRide, Access, Via to Transit, Sound Transit express buses), water (King County Water Taxi), and rail (Seattle Center Monorail, Seattle Streetcar, Link Light Rail, Sounder commuter train); reduced fare for other transit modes is also available through the E-purse available through the ORCA card.	ORCA LIFT, a transit pass with reduced fares. ^[2] Discounts range widely depending on mode and provider, from 25% (Everett Transit) up to 74% (Sounder Train). Both Pierce Transit and Washington State Ferries do not participate in the discount program.
Income Requirements	80% FPL or below plus enrollment in one of six state benefit programs.	200% FPL
Proof of Income	Temporary Assistance for Needy Families (TANF)/State Family Assistance (SFA); Refugee Cash Assistance (RCA); Aged, Blind or Disabled Cash Assistance (ABD); Pregnant Women Assistance (PWA); Supplemental Security Income (SSI); and Housing and Essential Needs (HEN).	Proof of enrollment in certain state programs, letters or other proof of employment or unemployment, or tax returns.
Residence Requirements	Yes, King, Pierce, and Snohomish counties	No
Proof of Residence	Valid government-issued ID	N/A

Program Category/ Enrollment Requirement	Program Details	
Enrollment Method	Enrollment verification occurs by telephone or in person at Washington State Department of Social and Health Services, Seattle & King County Department of Public Health, and non-profit Catholic Community Services across King, Pierce, and Snohomish counties; or online through the King County Reduced Fare Portal. Online application requires uploading images of verification documents, including photo ID.	Enrollment verification occurs by calling the King County Community Health Access Program, applying online using the Reduced Fare Portal, or visiting authorized enrollment offices in King County.

Note: Multiple columns under Program Details indicate multiple benefits.

^[1] <https://kingcounty.gov/depts/transportation/metro/fares-orca/subsidized-annual-pass.aspx>

^[2] <https://kingcounty.gov/depts/transportation/metro/fares-orca/orca-cards/lift.aspx>

LA METRO LOW-INCOME AND TRANSIT-RIDER CREDIT AND WAIVER OF RECURRING FEES (CALIFORNIA)

Table A-5 provides a program summary of this low-income transit program implemented in Southern California.

Table A-5. LA Metro Low-Income and Transit-Rider Credit and Waiver of Recurring Fees

Program Category/ Enrollment Requirement	Program Details
Facility Type	Highway Toll/Mass Transit Fare Cross-Benefits
Tiered Benefits?	No
Program Features	<ul style="list-style-type: none"> ▶ Low-income users receive one-time \$25 toll credit and waiver of \$1 monthly account maintenance fee ▶ Users who ride the buses on the express lanes receive a \$5 toll credit for every 16 bus trips ▶ Spends net toll revenues of neighborhood projects ▶ Users must have an electronic fare (TAP) card
Income Requirements	200% FPL or below
Proof of Income	Check stub, EBT card, proof of free-reduced school lunch receipt
Residence Requirements	Yes, Los Angeles County

Program Category/ Enrollment Requirement	Program Details
Proof of Residence	Photo ID
Enrollment Method	Enrollment verification requires users to travel to or call a customer service center and show/fax proof of Los Angeles County residence as well as income

ELIZABETH RIVER TUNNELS (VIRGINIA)

Table A-6 provides a program summary of this low-income discount toll program implemented in Virginia.

Table A-6. Elizabeth River Tunnels

Program Category/ Enrollment Requirement	Program Details
Facility Type	Tunnel Toll
Tiered Benefits?	No
Program Features	Low-income users receive a 50% discount for 2-axle tolls in the Downtown and Midtown tunnels for up to 10 trips per week. ^[1]
Income Requirements	\$30,000 annual income (approx. 200% FPL) or below
Proof of Income	Acceptable documents include W-2, 1099-MISC, One month of pay stubs, IRS 1040, Employer's statement, Self-declaration of no income.
Residence Requirements	Yes, Portsmouth City or Norfolk City Counties
Proof of Residence	Driver's license, utility bill, bank account statement, property tax bill, proof of home ownership, or rental contract
Enrollment Method	Enrollment verification requires users to apply at an E-ZPass customer service center in Norfolk or Portsmouth.

^[1] <https://www.virginiadot.org/newsroom/statewide/2021/enrollment-now-open-for-2022-vdot-toll-relief-program12-1-2021.asp#:~:text=Beginning%20December%201%2C%202021%2C%20Norfolk,to%2010%20trips%20per%20week>.

TREASURE ISLAND MOBILITY MANAGEMENT AGENCY LOW-INCOME TOLL PROGRAM (CALIFORNIA)

Table A-7 provides a program summary of this low-income toll program implemented by the San Francisco County Transportation Authority.

Table A-7. TIMMA Low-Income Toll Program (Planned)

Program Category/ Enrollment Requirement	Program Details	
Facility Type	Cordon Per-Direction Toll	
Tiered Benefits?	Yes	
Program Features	<ul style="list-style-type: none"> ▶ Estimated start date is 2024 ▶ Non-resident private vehicles will be tolled when entering and exiting the island at \$5 per-direction peak and \$2.50 per-direction off-peak. Households with moderate and low incomes are eligible for a 50% discount. ▶ Households with very low incomes are eligible for toll exemption. ▶ Treasure Island residents will be exempt from the toll. ▶ Spends net toll revenue on expanded transit service and mobility improvements. ▶ Treasure island employers will also be provided a quarterly subsidy, which may be used to compensate employees with low incomes or add cash value to toll tags.^[1] 	
Income Requirements	Less than 55% Area Median Income	55-120% than Area Median Income
Proof of Income	Unknown	Unknown
Residence Requirements	Yes	Yes
Proof of Residence	Toll only applies to non-residents	Toll only applies to non-residents
Enrollment Method	Unknown	Unknown

Note: Multiple columns under Program Details indicate multiple benefits.

SFCTA= San Francisco County Transportation Authority; TIMMA = Treasure Island Mobility Management Agency

^[1] https://www.sfcta.org/sites/default/files/2022-01/TIMM_PIR_2021_2022-01-21.pdf

MEDELLÍN, COLOMBIA

The Metro de Medellín in Colombia is included in this list of programs because it offers a wide range of tiered fare options for a variety of transit modes in the city, including rail, bus, and gondola. Tiered fares are determined by average neighborhood income, and the lowest tiers pay a small percentage of full fare. Gondola lines like the Cable Arví, which travel between the city center and the neighborhoods and parks in the surrounding hills, have a qualification system based on Colombia's SISBEN system, where the economic wellbeing of individual households are evaluated for the purpose of selection for social programs.

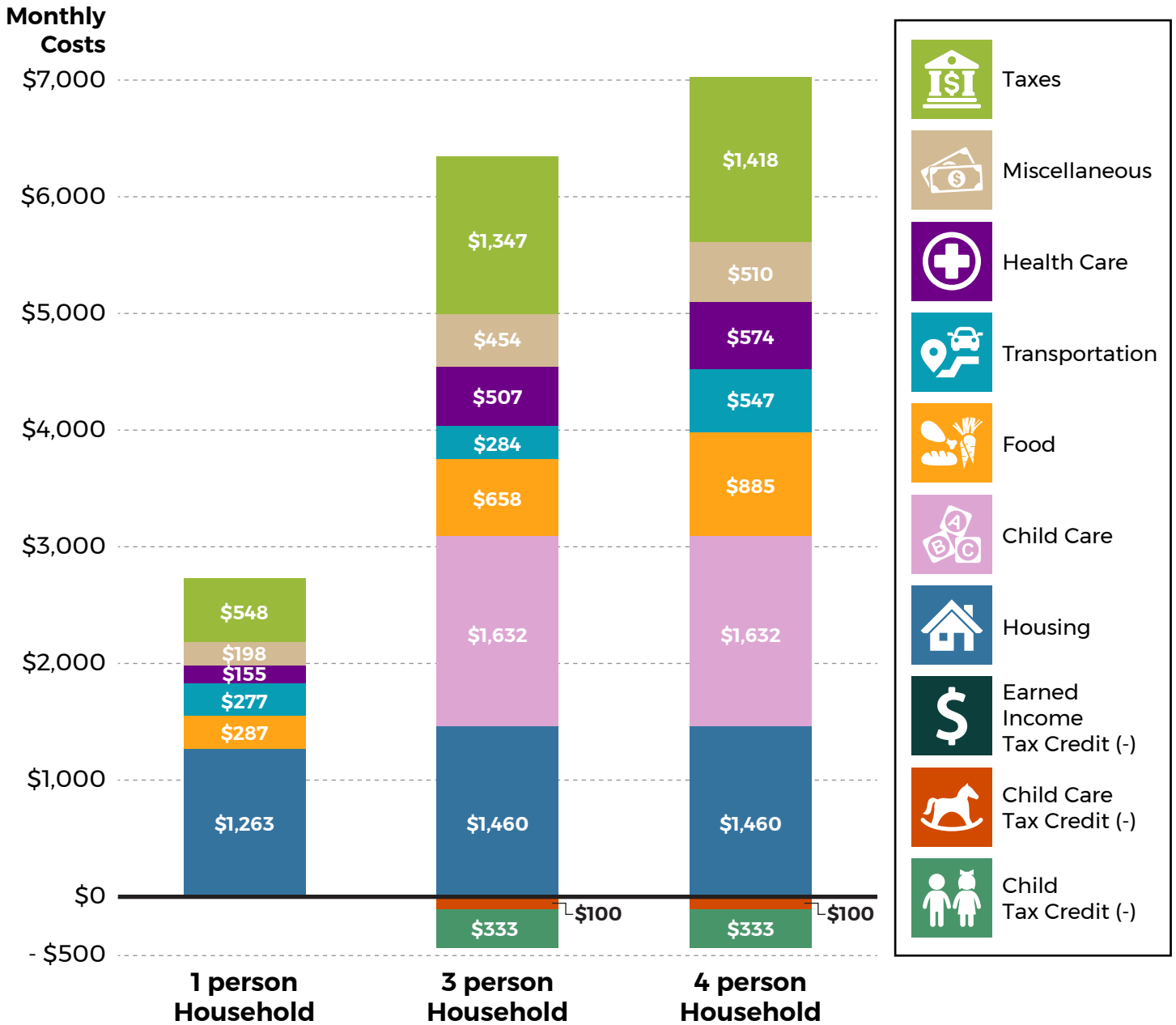
A.3 Regional Incomes, Cost of Living, and Eligibility Thresholds

Many of the above toll equity programs use the federal poverty level (FPL) as a reference to determine eligibility for benefits. FPL is a national standard, allowing it to be easily referenced and understood; however, it does not always reflect the current cost of basic household necessities or differences in cost of living across specific geographies in the United States. Depending on the median income in an area, people experiencing low incomes or very low incomes compared to other members of their local community may still have incomes that fall above the FPL, even though the local cost of living may exceed their income. Portland, and the other geographies listed above, fall into this category, and may benefit from using a multiple (e.g., 200%) of the FPL as a threshold. However, this threshold should be specific to local conditions, such as those shown in **Figure A-3**, to ensure that the full focus population of benefit recipients can be eligible.

Another way to compare local income distributions is ALICE (Asset Limited, Income Constrained, Employed) methodology. This strategy uses a standardized set of measurements to quantify the cost of a basic household budget in each county of partner states. The ALICE threshold represents the minimum income level necessary for survival for a household and is derived from the ALICE Household Survival Budget—the bare minimum cost of household basics including housing, child care, food, transportation, technology, and health care, plus taxes and contingency equal to 10% of household budget. See **Figure A-4** for the 2018 thresholds across Oregon counties.

Table A-8 summarizes ALICE and FPL data for each geography noted above, with the exception of California where only FPL data is available.

Figure A-3. Budget Comparison (Oregon 2018)

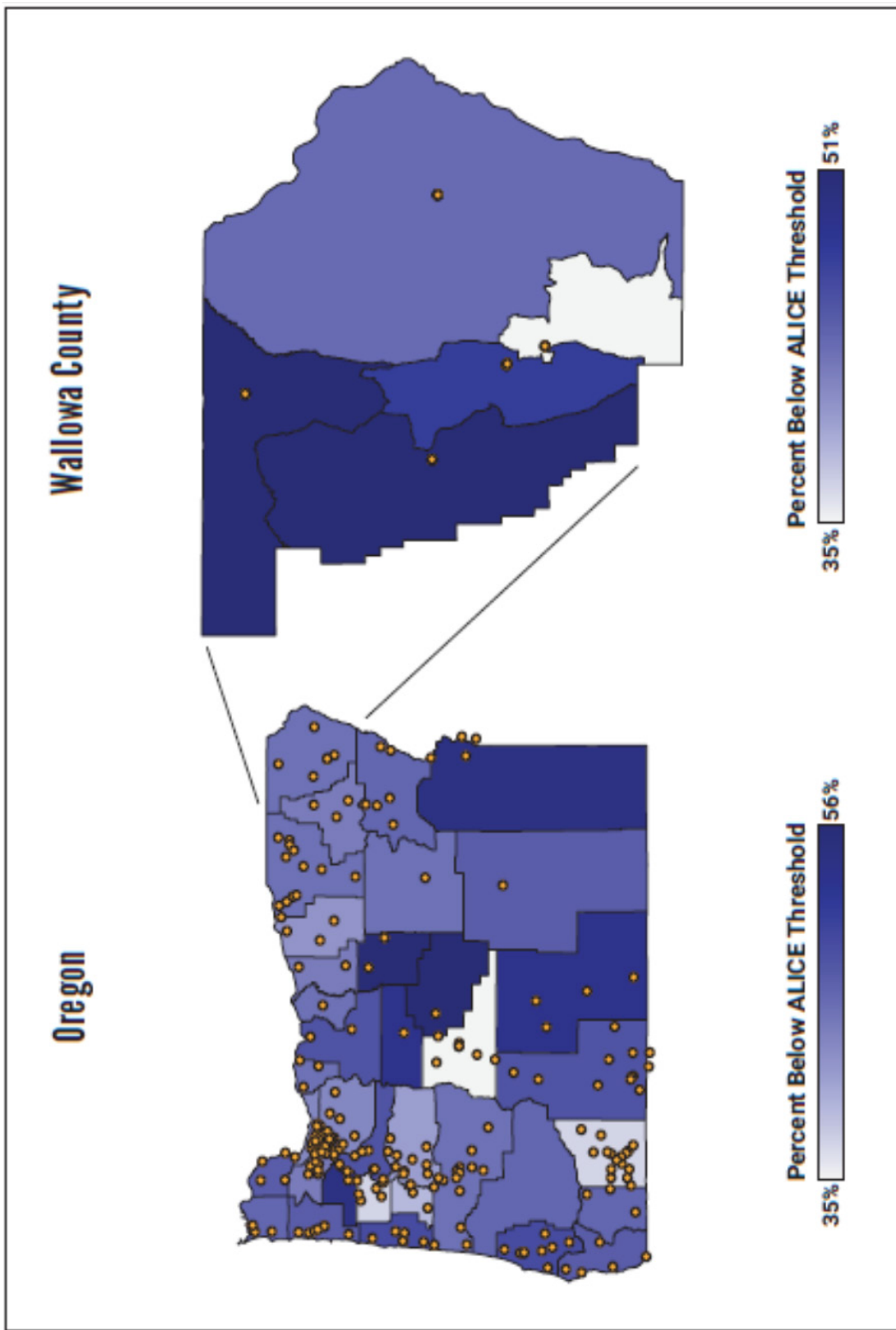


Monthly Total	\$2,729	\$5,909	\$6,593
Annual Total	\$32,748	\$70,908	\$79,116

Source: University of Washington. 2020 and 2021. The Self-Sufficiency Standard for Oregon (<https://selfsufficiencystandard.org/oregon/>) and The Self-Sufficiency Standard for Washington (<https://selfsufficiencystandard.org/washington/>).

- Notes:**
- ▶ Washington data (Clark and Skamania counties) is from 2020
 - ▶ Oregon data (Clackmas, Columbia, Multnomah, Washington, and Yamhill counties) is from 2021
 - ▶ 1 person household = 1 adult
 - ▶ 3 person household = 1 adult, 1 preschooler, 1 school age child
 - ▶ 4 person household = 2 adults, 1 preschooler, 1 school age child

Figure A-4. Library Locations and Household Below ALICE Threshold (Oregon 2018)



Sources: ALICE Threshold, 2018; American Community Survey, 2018; The Institute of Museum and Library Services, 2019

Table A-8. ALICE and FPL Data for Each Geography

Data Type	ALICE (Asset Limited, Income Restrained, Employed)	Self-Sufficiency Standard for Oregon
Organization	United For ALICE	Worksystems
Organization Description	Driver of innovation, research, and action to improve life across the country for ALICE (Asset Limited, Income Constrained, Employed) and for all. Through the development of the ALICE measurements, a comprehensive, unbiased picture of financial hardship has emerged.	Non-profit agency that accelerates economic growth in the City of Portland, Multnomah and Washington counties by pursuing and investing resources to improve the quality of the workforce.
Update Frequency	Bi-annually	Annually (since 2020, every three years), though individual data sources depend on individual update frequency
Most Recent Update	2018	2021
Philosophy (i.e. what is it trying to accomplish?)	Based upon the highest quality, unbiased data we are able to measure financial hardship and understand why so many households struggle to make ends meet. Each ALICE report contains data on household budgets, demographics, employment opportunities, housing affordability, public and private assistance, and other critical economic factors.	Comprehensive, credible, user-friendly tool to ensure the best data and analyses are available to enable Oregon's families and individuals to make progress toward real economic security.

Data Type	ALICE (Asset Limited, Income Restrained, Employed)	Self-Sufficiency Standard for Oregon
Methodology (i.e. what is it counting and how?)	Measure calculates how much income a family must earn to meet basic needs without private or public assistance, varying by family composition, which city or county they live in Oregon, and accounting for the need for emergency savings (10% contingency). Based on the costs of basic needs for working families: housing, child care, food, health care, transportation, miscellaneous items, the cost of taxes, and technology.	Measure calculates how much income a family must earn to meet basic needs without private or public assistance, varying by family composition, which city or county they live in Oregon, and accounting for the need for emergency savings. Based on the costs of basic needs for working families: housing, child care, food, health care, transportation, and miscellaneous items, and the cost of taxes and impacts of tax credits like the American Rescue Plan Act of 2021
Geographies	All counties in Arkansas, Connecticut, Delaware, Florida, Hawaii, Idaho, Illinois, Indiana, Louisiana, Maryland, Michigan, Mississippi, New Jersey, New York, Ohio, Oregon, Pennsylvania, Tennessee, Texas, Virginia, Washington, West Virginia, and Wisconsin	All counties in Oregon, specific cities such as Portland; also, 41 states, the District of Columbia, and New York City
Website	https://www.unitedforalice.org/state-overview/Oregon	www.selfsufficiencystandard.org/Oregon
Data Availability	Excel file with ALICE data for all family types in every Oregon county	Excel file with Self-Sufficiency Standard data for all family types in every Oregon county
Use in other programs in Oregon	Only information for Pacific NW: Avista, Ford Family Foundation, Idaho Community Foundation, Idaho Nonprofit Center, Providence Health Care, WaFd Bank, WSECU, United Ways of the Pacific Northwest	Multnomah County Preschool for All program (qualification standard); Worksource Center Oregon (scholarship awards and to support service needs); Office of Forecasting, Research and Analysis for the State of Oregon (tax model impacts); Portland Development Commission (“prosperous households” measure)

Appendix:

B: Decision-Making Framework for Type of Discount



A decision-making framework was developed to help evaluate the options included in this report with regard to the type(s) of benefits to provide, the method of enrollment, and the selection of income criteria. The following options were evaluated:

- Percentage discount
- Credit for a specific number of free trips per month
- Monthly credit
- Fixed discount

For each option, 11 metrics were evaluated at a high level, and each of the 11 metrics was assigned a percentage weight, with the weights adding up to 100%. This allows the decision-making framework to generate a score for each option. The metrics and weights are shown in **Table B-1**.

Table B-1. Framework Metrics and Percentages

Metric	Weight
User benefit:	55%
The net monetary benefit per household for highway users experiencing low incomes	5%
The decrease in how regressive tolls are for highway users experiencing low incomes (tolls are regressive if everyone pays the same—those with lower incomes spend a higher percentage of their income on a fixed cost)	10%
Encouraging the free or very low cost availability of a reliable trip for infrequent high-value trips, such as medical or childcare	20%
The increase in the share of time savings accruing to highway users experiencing low incomes	10%
Lessening the burden to highway users experiencing low incomes due to account minimums and automatic reloading events	10%
Program cost:	20%
Reduction in total toll payments as a result of the program	10%
Cost of program implementation (excl. toll impact and incl. temporary or permanent staff needs for enrollment)	5%
Ease of program implementation for implementing agency(s)	5%
Operational impact:	10%
Operational impact, including eroding travel time and environmental benefits of pricing	10%
Other feasibility:	15%
Easily explained to decision-making stakeholders and eventual program participants	10%
Are the stakeholders (legislature, implementing agencies, etc.) willing to support this option?	5%

The framework is designed to allow iteration based on feedback from stakeholders and outreach on the importance of different metrics, as well as the score of each option on each metric. Some high-level ideas that drove the initially selected scores include:

- It is anticipated that self-certification would increase enrollment in the program.
- People experiencing low incomes have diverse travel needs, and their commute trips tend to be more broadly distributed at all hours of day, as opposed to being confined to the peaks.
- A credit or free-trips option (as opposed to a percentage discount) diminishes the burden of credit or debit card requirements, minimum account balances, and automatic reloading events.
- A multi-tier eligibility threshold makes tolling less regressive, but it requires additional explanation, is harder for program users to understand, and is costlier to implement. Stakeholders have emphasized the benefits of both options: that simplicity is critical, but as is acknowledging the different travel and budget needs of people experiencing very low incomes as opposed to people experiencing moderately low incomes.
- Given the early stage of the Oregon Toll Program, all discount options appear equally feasible from a tolling back-office perspective. Self-certification is much simpler for the implementing agency than other verification options.
- Percentage discounts and free trips incentivize traveling the in peak periods, whereas free trips and fixed discounts incentivize traveling in off-peak periods and as such have lower operational impacts, but also less impact on making the time-saving distribution more equitable.
- Percentage discounts are easiest to understand and track, for program participants, but have other disadvantages.
- Stakeholders have been broadly supportive of percentage discounts, credits, and a fixed number of free trips.

- The results of the framework are shown in full in **Figure B-1** and indicate that:
 - » Providing a recurring credit or a recurring number of free trips provides the greatest combined value, followed by a percentage discount.
 - » Self-certification on balance is more effective than actively verifying income on enrollment.
 - » Both one-tier and multi-tier options work well, with a slight edge to multi-tier program versions.

Figure B-1. Framework Results

Weight--->			100%	5%	10%	20%	10%	10%	55%	10%	5%	5%	20%	10%	10%	5%	15%
Discount Option	Enrollment	Tiered	Total	A1	A2	B1	B3	D2	User Benefit	E1	E2	E3	Cost	Operational Impact	D1	F1	Other Feasibility
% Discount	Self-Certification	One	5.0	2	5	2	4	1	2.7	8	8	7	7.8	6.0	10	7	9.0
		Multi	5.3	4	8	3	6	3	4.5	6	8	7	6.8	4.0	7	7	7.0
	Confirmed Eligibility	One	3.6	1	3	1	2	1	1.4	9	3	3	6.0	8.0	5	7	5.7
		Multi	3.7	2	4	2	3	2	2.3	8	2	3	5.3	7.0	4	7	4.7
# Free Trips	Self-Certification	One	6.1	5	5	8	8	6	6.8	5	6	7	5.8	2.0	6	7	6.3
		Multi	6.2	7	8	8	8	8	7.9	3	6	7	4.8	2.0	3	7	4.3
	Confirmed Eligibility	One	4.1	3	3	4	4	3	3.4	8	2	3	5.0	6.0	3	7	4.3
		Multi	4.1	4	4	4	4	4	4.0	7	1	3	4.3	6.0	2	7	3.3
Monthly \$ Credit	Self-Certification	One	5.7	6	5	8	6	5	6.4	4	6	7	5.3	4.0	4	7	5.0
		Multi	5.8	8	8	8	6	7	7.5	2	6	7	4.3	4.0	1	7	3.0
	Confirmed Eligibility	One	4.0	3	3	4	3	3	3.2	7	2	3	4.8	7.0	2	7	3.7
		Multi	4.0	4	4	4	3	4	3.7	6	1	3	4.0	7.0	1	7	2.7
Fixed Discount	Self-Certification	One	4.7	2	5	2	2	1	2.4	8	8	7	7.8	8.0	8	4	6.7
		Multi	5.0	4	8	3	4	3	4.2	6	8	7	6.8	6.0	5	4	4.7
	Confirmed Eligibility	One	3.4	1	3	1	1	1	1.2	9	3	3	6.0	9.0	4	4	4.0
		Multi	3.5	2	4	2	2	2	2.1	8	2	3	5.3	8.0	3	4	3.0



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