

To: New York City Human Resources Administration

Re: Proposed Amendments to Chapter 12 of Title 68 of the Rules of the City of New York Regarding the Fair Fares NYC Program, Reference Number HRA-47

I am writing in strong support of the proposed amendments to the Fair Fares NYC program. As a City College of New York student interested in public service, public space, and environmental justice, I understand how transportation access affects whether New Yorkers can fully participate in the city. For students and working New Yorkers, public transportation is not simply a way to travel. It is what makes access to education, employment, healthcare, food, and other opportunities possible.

HRA proposes two important changes: increasing Fair Fares income eligibility from 150 percent to 200 percent of the Federal Poverty Level (FPL), and expanding flexibility around re-enrollment. Specifically, proposed 68 RCNY 12-03(a)(3)(C) would raise the income limit to 200 percent FPL, while proposed 12-04(d) would allow participants who enrolled while receiving public assistance to remain enrolled without re-enrolling as long as they continue receiving public assistance and meet the applicable requirements. (Proposed Rule, pp. 3b4).

I respectfully recommend that HRA: **(1)** adopt the 200 percent FPL eligibility expansion; **(2)** adopt the proposed exemption from re-enrollment for continuing public assistance recipients; and **(3)** continue simplifying enrollment and renewal procedures for all eligible New Yorkers.

The proposed expansion recognizes that being above the federal poverty level does not necessarily mean transportation is affordable. HRA itself states that Fair Fares helps low-income New Yorkers manage transportation costs and improves access to jobs, education, healthcare, food, parks, and recreation. (Proposed Rule, p. 3).

This is especially important in New York City, where residents depend heavily on public transportation to reach work, school, medical appointments, and essential services. The New York City Council estimates that expanding Fair Fares eligibility to 200 percent FPL would make approximately 340,000 additional New Yorkers eligible for the program. (New York City Council, 2026). This expansion would help address transportation costs for people who may not live below the poverty line but still face significant financial pressure from the cost of getting around the city.

I also strongly support the proposed change to re-enrollment. HRA explains that it already has information necessary to verify continued eligibility for people receiving public assistance. Eliminating a separate re-enrollment requirement therefore reduces an unnecessary administrative burden for both participants and the agency. (Proposed Rule, p. 3).

This principle should extend to the broader program. A transportation benefit is only effective when eligible residents can access and maintain it. Students, workers, and families may already be balancing employment, school, caregiving, and other responsibilities. Avoiding unnecessary paperwork can help ensure that people do not lose transportation assistance simply because of an administrative barrier.

The proposed rule therefore represents more than an adjustment to an eligibility number. It is an opportunity to make transportation more accessible and reduce a barrier to participation in New York City's economic, educational, and civic life. HRA's stated purpose supports this goal by recognizing that improved transportation access can reduce income disparities and improve quality of life for low-income New Yorkers. (Proposed Rule, p. 3).

I respectfully urge HRA to adopt the proposed amendments to Fair Fares. Specifically, HRA should **(1)** increase eligibility from 150 percent to 200 percent FPL, **(2)** eliminate re-enrollment requirements for eligible participants who continue receiving public assistance, and **(3)** continue reducing unnecessary administrative barriers throughout the program.

Fair Fares is ultimately about more than the price of a subway or bus ride. Affordable transportation determines whether New Yorkers can reach education, employment, healthcare, food, and other opportunities throughout the city. Expanding eligibility and making continued participation easier would make New York City more accessible to the people who rely on public transportation every day.

Thank you,

Arnab Joseph Gomes

Sources:

New York City Human Resources Administration. *Notice of Public Hearing and Opportunity to Comment on Proposed Amendments to Chapter 12 of Title 68 of the Rules of the City of New York Regarding the Fair Fares NYC Program*, 2026.

New York City Council. *Council Members Call for Expansion of Fair Fares to 200% of the Federal Poverty Level*, 2026.