

Assessing Federal Employment Accessibility Policy: An Analysis of the JARC Program

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Little innovation has occurred in the United States regarding unemployment and poverty and how it can be addressed with improvements in urban transportation mobility. By all appearances, the circumstances surrounding employment and income levels have remained strikingly similar over the past 40 years. At the same time, proposed policy remedies for improving the conditions of low-income persons have remained relatively constant. Relevant published accounts continue to cite shifting residential and employment location patterns and poor public transportation service quality as critical obstacles to improving the economic and social conditions of low-income persons. This policy brief focuses on the federal Jobs Access and Reverse Commute Program (JARC), which was instituted along with restructured federal welfare policy in order to highlight its relevance and prospects for the future.

I. Introduction

The civil rights movement and race riots of the 1960s and 1990s drew attention to low-income communities, particularly urban communities of color, and sparked important federal policy responses to social exclusion. The movement also underscored an often overlooked aspect of social mobility and economic inequality—transportation.

Federal goals for social mobility then and now, however, were mixed. In the 1960s, efforts to increase mobility and job access in impoverished communities were designed largely to quell social unrest rather than explicitly address social exclusion in the interests of economic justice. Similarly, social policy changes in the 1990s emphasized paring back the federal welfare system and devolving power to states rather than poverty alleviation. Lessons from each of these time periods, however, illuminate the relationships between transportation mobility, employment, economic well-being, and the often whipsawed response of the federal government to these issues.

This paper considers a 40-year span of federal policy toward transportation mobility for low-income workers, including the most recent Job Access and Reverse Commute (JARC) program, administered by the Federal Transit Administration (FTA). At its inception, policymakers and advocates viewed JARC as a major policy victory for low-income and minority communities. Grassroots organizations were pivotal to its enactment, particularly community organizing groups in major metropolitan areas such as Chicago, Philadelphia, Los Angeles, Hartford, and Columbus.

The paper begins with a discussion of federal policy during the 1960s and 1970s. Then, as now, the social and economic circumstances—and the federal policy response—surrounding transportation mobility are strikingly similar. Employment accessibility studies from the 1960s through the early 2000s consistently characterize the situation facing low-income workers in simplistic terms that primarily stress the travel connection to jobs, largely ignoring nonwork travel and other household needs. This myopic view also informs federal policy, which stresses work-related travel. The final sections of the paper examine the types of projects that JARC funds and the relative size and distribution of project funds.

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The assessment argues that JARC objectives overlook important aspects of transportation mobility for low-income workers. The conflicting goals embodied in program design in turn have direct implications for JARC's effectiveness. In addition, the types of projects funded and the amount of funding provided by JARC are unlikely to have significant, sustainable effects on the economic well-being of low-income workers. A series of reports and analyses of the JARC program have provided little evidence of overall effectiveness. Indeed, evaluation is particularly difficult in part because the program has never been implemented as it was originally envisioned. For every example of a good project—one that followed the planning requirements of the original bill and garnered wide political and financial support—there are unfortunate examples of earmarked, poorly designed projects with no hope of being sustained. Nonetheless, the U.S. Department of Transportation (DOT) and the FTA are loathe to give up any resources they might squeeze out of Congress and eliminate the program .

II. Background

Following the Los Angeles civil rights protests of the 1960s, the McCone Commission found that inadequate transportation contributed to high rates of unemployment among the urban black population.¹ In 1968, the National Advisory Commission on Civil Disorders (also known as the Kerner Commission) released its report on the causes and effects of riots in U.S. cities. They, too, recommended improved transportation links between “ghetto” neighborhoods and new job locations in the suburbs to enhance employment opportunities for central-city residents.²

Many years later, the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991 promised to improve the mobility of the economically disadvantaged through “intermodal connections between people and jobs, goods and markets, and neighborhoods.”³ Five years after that, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), “welfare-to-work,” and job access programs again brought attention to mobility for low-wage workers.⁴ However, few (if any) of these programs have produced consistently successful strategies.⁵

The Urban Mass Transportation Act of 1964 created the Urban Mass Transportation Administration (UMTA) to award grants to develop urban public transit systems for impoverished job seekers. In 1968, UMTA assumed the responsibility for these grants from a program previously administered by the Department of Housing and Urban Development (HUD). UMTA awarded capital grants of up to two-thirds of the net project cost for “construction, reconstruction, or acquisition of mass transportation facilities and equipment.” These grants were to encourage planning for large mass transportation systems that were needed for continued urban development. The act also provided for a research, development, and demonstration program with an initial budget of \$150 million per year for these projects.

Reports on UMTA demonstration projects included few systematic performance evaluations of project outcomes.⁶ Some highlighted the inherent difficulties in determining the effectiveness of such programs, such as having no established performance measures and an inability to control at the program level for other factors that affect an individual's employability. In addition, some reports noted that as low-income workers benefit from increased job access, they can often purchase an automobile, which takes them off public transit.⁷ This conundrum—public transit funding as a means to car ownership—is a challenge to policymakers seeking sustainable transportation solutions. It also fails to recognize that employment accessibility is as much a land use problem as it is a transportation issue. For example, workforce programs that, through creative financing, zoning, and real estate development incentives, provide affordable housing near employment should be incorporated into job access and reverse commute strategies alongside mobility strategies.

Most of the UMTA projects failed to meet a cost-benefit criterion despite the service's value to individual users. However, advocates for these programs then and now question the cost-benefit criterion as a performance measure for programs designed specifically to serve racial, ethnic, and class minorities because such criteria typically measure the relative merit of a project on the basis of utilitarian theories of the public good. Utilitarian measures tend to favor majority interests. The UMTA projects, by contrast, served democratic minorities as a means of promoting civil rights—not to provide utilitarian gains to the general public except to the extent that civil rights carry subsidiary benefits to society as a whole. Most individual public transit projects—not just mobility programs for low-income workers—

would fail to meet financing self-sufficiency and cost-benefit criteria. These were, and continue to be, the wrong metrics to apply to social service and civil rights programs.

In summarizing the UMTA demonstration projects Sandra Rosenbloom concluded that, “The earliest reverse commute projects were generally failures whether measured by jobs gained or new transportation services created and sustained. The only possible ‘successes’ were those that did little more than effectively use underutilized outbound capacity on traditional peak hour bus service.”⁸

It would be several years until the next significant federal policy was implemented that focused on transportation mobility needs for low-income individuals. The Clinton administration’s JARC program fell easily into the range of specialty programs in the mid-1990s designed to address an issue particular to job access. The real problem, however, was the needs of low-income and minority residents. Unlike the policies of the 1960s and 1970s, which stressed transportation projects, not programs, federal efforts in the 1990s redirected the focus to embedding transportation solutions in larger social welfare programs.

A. Welfare Reform

Effective October 1, 1996, the low-income cash assistance program Aid to Families with Dependent Children (AFDC) and the job training program, Job Opportunities and Basic Skills Training (JOBS), merged into a single program. The program provided block grants to states with federally approved plans for Temporary Assistance for Needy Families (TANF) with a minor child. This federal grant program was administered by the Secretary of the Department of Health and Human Services (DHHS) for Family Support.

Once authorized, a state could use the block grants “in any manner reasonably calculated to accomplish TANF purposes; or in any manner...under the former AFDC and JOBS programs.”⁹ The application process required state representatives to assess recipients’ skills, prior work experience, and employability to determine the support needed to achieve self-sufficiency. In collaboration with each recipient, social services staff were to develop an Individual Responsibility Plan (IRP) that could include assistance for substance abuse treatment, child care, and medical care needs. States could also use program funds for pre-pregnancy family planning services; home heating and cooling costs; development accounts for first home purchase and other qualified purchases; and payments to job placement agencies. The flexibility to use grant funds (as well as those provided under the JOBS program) also allowed states to use program funds for transportation purposes. The law, however, did not expressly specify transportation funding, and therefore each state differed in its respective policies about transportation provisions.

1. Initial Evaluation Efforts

A 1998 report by the Government Accountability Office (GAO) following PRWORA and the Transportation Equity Act for the 21st Century (TEA-21) assessed the role of transportation in economic mobility. Specifically, the report (1) determined whether current research demonstrated a need for transportation services in implementing welfare reform, (2) assessed the preliminary results of FTA’s welfare-to-work programs, which ..., and HUD’s Bridges to Work program, which sought to address the geographic mismatch between low-income or unemployed workers and potential job opportunities; and (3) determined how an Access to Jobs program would support welfare reform.¹⁰

The GAO report found that 75 percent of welfare recipients lived in either the central city or rural areas, with the other 25 percent living in the suburbs. Fifty percent of welfare recipients lived in central cities compared with 30 percent of the total population. The majority of welfare recipients were single mothers, and one-half had very young children. In addition, nearly 75 percent of these mothers had a high school diploma or less.

Among welfare recipients, vehicle ownership was as low as 6 percent in some areas. One reason for low ownership was that states often set a ceiling on assets, including automobile value, in determining welfare eligibility. Under federal law, a recipient could only own cars worth \$1,000 or less. Most states had overall resource limits of \$3,000 (depending on household size, age of household members, program participation, etc.) Many states have since exempted the value of one or more vehicles from these calculations.

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The GAO report further found that public transit services inadequately met the travel needs of welfare recipients. At the time of the report, 70 percent of entry-level jobs in manufacturing, retail, and wholesale sectors were located in the suburbs. Of these employers, only 32 percent were within one-quarter of a mile of a transit stop. In addition, some of the jobs that were transit accessible were only served by commuter rails, which can be too expensive for low-income wage earners. The GAO also found that shifts in entry-level jobs were typically nonpeak hours. The added travel time of this spatial and time mismatch was an additional impediment to work, given that most welfare recipients are single mothers of young children in day care. To better meet these travel demands, more flexible approaches were needed.

The GAO report also evaluated existing pilot transportation programs, finding a clear lack of accountable progress. In Fresno, CA, a pilot program provided transportation services to employment training centers in an attempt to reduce high dropout rates. Of 269 participants, only 20 completed the program and three had found jobs. These numbers were not particularly impressive on their own; furthermore, no baseline data were provided to indicate increases in program completion. The HUD Bridges to Work program sought to place 3,000 participants in five cities in suburban jobs within four years. After two years, the program had placed only 429 individuals in targeted jobs.

With the evidence on vehicle ownership, existing transit systems, welfare recipients, and the demonstration projects, the GAO made specific recommendations for implementing the JARC program. First, the GAO recommended that DOT establish specific objectives, performance criteria, and measurable goals for the program. Second, the program should require program grant recipients to coordinate transportation strategies with local job placement and other social service agencies. Third, DOT should work with other federal agencies, such as the departments of Health and Human Services, Labor, and HUD, to coordinate welfare-to-work activities to ensure that program funds complement and not duplicate other welfare-to-work funds available for transportation service.¹¹

To address these findings, JARC focused on both *job access* and *reverse commute*. The *job access* projects were to develop new or expanded transportation services for welfare recipients and other eligible low-income individuals (those with incomes at or below 150 percent of the poverty line) to jobs and other employment-related services (education, training, child care, etc.). These projects could include capital projects and operating costs of equipment, facilities, and maintenance. Agencies could also use funds to promote transit use by workers with nontraditional schedules, transit vouchers, and employer-provided transportation, including the transit pass benefit under section 132 of the Internal Revenue Code of 1986. Typically, services developed under the Access to Jobs programs have included shuttles, vanpools, and additional busses.

The *reverse commute* programs transport individuals to suburban employment centers from urban, rural, and other suburban locations for all populations. Specifically, grants fund reverse commute bus, train, carpool, or van services. Funds may subsidize van or bus purchases or leases by a nonprofit organization or public agency, or, indeed, just about any transport service to suburban employment opportunities.

States, local governments, local transit agencies, and nonprofit organizations were all eligible for the JARC grants. In urban areas with populations of at least 200,000, organizations applied to the local metropolitan planning organization (MPO). In areas with fewer than 200,000 residents, they applied to the state-designated chief executive officer. The FTA then made awards to either the MPO or the state, which would pass the funds through to a lead project agency or eligible recipient, which was a private nonprofit organization, state or local authority (such as Tribes), or transit operator. The grant required tribal governments to go through the state process, but once selected, they could choose to receive funding through the state or FTA directly. The process ensured that applicants developed their proposals collaboratively, including transportation agencies, human service agencies, public housing, child care organizations, employers, states, affected local communities, and other stakeholders. Program applications were evaluated based on the factors summarized in Table 1.

Table 1. JARC Grant Evaluation Criteria

Percentage of service population that are welfare recipients
Additional service need, including bicycles
Project suitability to transport goals
Demonstration of planning and project coordination
Financial commitment among the proposal partners
Network and service hour extensions
Regional coverage
Community involvement and consultation
Conformity with regional transportation plan
Innovativeness of the project
Project schedule
Geographic distribution

Congress authorized \$150 million per year for JARC for fiscal years 1999 through 2003, but it only guaranteed \$50 million in FY 1999 with increases of \$25 million per year up to the full \$150 million in 2003. Total program funding limited Reverse Commute grants to \$10 million in any given year. Urban areas with populations larger than 200,000 received 60 percent of the total funds. The remaining 40 percent was split between urban areas under 200,000 and nonurban areas. Grants could only pay for up to 50 percent of total project or service costs, but other federal transportation-eligible funds could be used to meet the local match, including TANF and Welfare-to-Work (WtW) funding for Access to Jobs projects. However, both TANF and WtW funds have their own program rules. TANF funds may only be used for new or expanded services, not for construction and not to supplement operating costs. Similarly, WtW funds can be used only for transportation services not otherwise available to the participant.

JARC, WtW, and TANF funds were the major programs and funding streams that resulted from welfare reforms in the 1990s. Combined, they sought to overcome the long-standing spatial mismatch in U.S. cities between impoverished, low-wage workers and jobs. Despite the limits placed on funding, program design was flexible and encouraged transit and social service agencies to work collaboratively to meet unique local needs.

2. Implementation

In November 1999, the GAO issued a follow-up report on Job Access activities projects awarded in 1999, and the progress in implementing GAO's recommendations for project performance criteria.¹² The report found that in 1999, of the 181 grants awarded, 122 (67 percent) were to traditional transit agencies, 13 were to community organizations, and the remainder to other government agencies. The nontraditional organizations that participated included human service agencies, employers, and MPOs. Arguably, MPOs were familiar with transportation grants and therefore were in a position to assume a coordinating leadership role in metropolitan areas. Legislation also required MPOs to act as coordinator in areas with population greater than 200,000.

Most of the grants were to be used to expand or link to existing transit services, information programs, and education. One-half of the funding went to existing services and the other one-half went to nontraditional services, including vans, shuttles, and demand responsive systems. Other services included guaranteed ride-home vouchers, and traveler information systems targeted to low-income earners. Some of these services could also benefit all users of the transit system, beyond low-income or unemployed persons.¹³

In addition, on the basis of its mail survey to the program's grantees, the GAO found that grantees were generally satisfied with the program; 55 percent reported that the program was helping people get to work. Only 23 percent, however, thought the program was improving coordination. The low marks on coordination could indicate a variety of factors. Human service organizations may have

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already been included as stakeholders in local transit planning prior to the requirement. Alternatively, coordination might not extend beyond what was needed to complete the application. Specific complaints about the program included the time it took for the process and problems in obtaining local matching funds. Respondents approved of the FTA's seminars on the application process, but that DOL certification, environmental impact statements, and drug testing created problems during the application process.

The evaluations also examined agency conduct, whether grantees believed JARC was administered according to expectations, and to a limited degree the effectiveness of the federal agency in fostering local activity. Selection bias is a serious impediment, however, in program evaluation; agencies with awards are unlikely to impugn their funded projects. Given this bias, that just 55 percent said the programs improved mobility is surprising.

As Blumenberg and Schweitzer note in their report on JARC, in response to feedback from the grantees, Congress and the FTA shifted away from competitive grants and toward earmarks, that is, directing that funds be spent on specific projects that had in the past attained project funding through discretionary awards.¹⁴ Applying annually for project funding was time-consuming, the grantees argued, and they preferred longer-term funding for the projects. In addition, they noted, areas with the largest numbers or concentrations of welfare recipients should be given priority in JARC funding, which further argued for earmarked funding over discretionary funding. In moving to earmarks for the funding, the program effectively rewarded those agencies that originally won awards and consolidated federal legislative authority over the funding to local agencies, bypassing the federal agency's oversight of grant competitions.

Earmarking would last only until 2005, however. The reauthorization of TEA-21 changed the JARC program to a formula-based system of allocating funds to states and urbanized areas. Thus, some states that were not previously receiving grants were allocated funds in 2006. Other states received funds based on the relative number of low-income individuals and welfare recipients in each area.¹⁵ Because the total appropriations remained the same as in previous years, the decision substantially redistributed funding with windfalls and wipeouts. Some states saw increases as high as 1,200 percent, while others lost as much as 80 percent of their previous allocation.

The overall impact of this change is uncertain, but individual projects that have lost funding will likely vanish. Nearly 90 percent of grantees expected that services would be terminated with reductions or elimination of their grant funds.¹⁵ Yet allocating the funds more uniformly across states may have broad programmatic benefits. This assumes that the formula-based funding amounts will be sufficiently large to improve services.

In addition to the changes in allocation, TEA-21 introduced other changes in funding administration. Prior to receiving JARC funds, states and urbanized areas must establish that there are recipients ready for JARC funds, that a process has been established to select projects for funding, and a coordinated public transit and human services plan is in place.¹⁷ For the first time, JARC recipients can use some of their funds for planning activities among nontraditional transit providers—a change for which many recipients had lobbied. However, it is also possible that separate funding for planning reinforces autonomy among JARC recipients rather than promoting coordination, depending on whether existing transit agencies can help nontraditional providers with planning.

III. States' Activities

Welfare reform legislation awarded states greater flexibility in designing programs to address the unique needs of their low-income populations. Several of these programs addressed transportation issues directly. According to a report by the Community Transportation Association of America (CTAA), at least 40 states provide transit passes to low-income welfare recipients, but they vary in the amounts subsidized.¹⁸ Alaska offers a \$50 monthly maximum allocation. Arizona provides up to \$5 per day for bus passes but only for trips for job training. Georgia provides either transit passes or \$25 for other “alternative” modes.

Most states also now exempt automobile ownership from asset limitations in welfare program eligi-

bility guidelines. The exemption usually applies to only one automobile per family with additional automobiles calculated at equity value only. Provided that a program participant can obtain financing, the loan value would directly reduce the equity value of the vehicle. Tennessee offers no-interest car purchases for X. Wisconsin offered car loans up to \$1,600, interest free with repayment, that participants could repay either through cash or community service.

Some states also pay other automobile-related expenses, including mileage reimbursement, purchase, repair, licensing, and insurance for low-income workers. Only nine states did not offer mileage reimbursement, and Alaska prohibited reimbursement in areas with transit services. Some states reimburse as little as 10 cents per mile, while others pay as much as 33 cents per mile. Twenty states imposed total limits on the amount paid out on reimbursement.

Clearly, states have responded to new funding streams and flexible requirements with a range of programs for low-income residents. Unfortunately, few if any studies have evaluated how effectively these programs promote employment. (Section IV discusses why such performance evaluations are so difficult.) With a few notable exceptions, JARC grantees have not experimented with policies and programs. The most common programs provide simple public transit or auto subsidies to users across a variety of contexts. Wisconsin, Tennessee, and Vermont, each of which has extensive rural poverty, chose to provide auto programs along with transit, and there are a few cases of new, partnered programs. On the whole, however, most states offer basic transportation subsidies to individuals rather than creating new projects—an important contrast with federally administered JARC grants. Some states' efforts reflect the political environment of the state and place almost punitive limits on amounts available, but for the most part, states are doing very similar things with the funds.

In recent years, greater automobile ownership among low-income households has reemerged as a solution to spatial mismatch and transport mobility problems.¹⁹ As has past research on spatial mismatch, increasing auto ownership among low-income households as an antipoverty policy relies on several assumptions that have not been adequately tested. For example, if as John Kain originally argued, employment and housing discrimination are at the root of poverty, is increased transportation mobility an appropriate solution? Mobility alone may offer only a superficial response to social exclusion, a problem that derives from multiple social problems, including job discrimination exclusionary housing. In addition, numerous other mobility issues beyond transportation influence social and economic outcomes for low-income persons, including improvements in job information, job training, education, and technologies that influence work locations.

From a policy perspective, simply funding states to design their own programs does not by itself guarantee innovation. JARC evidence would suggest that the assumption that states needed flexibility was only partially true. Of course, it could be that the available funding was not enough to encourage experimentation. It could also be that state agencies, because they are close to constituents and scrutinized by federal agencies, are more risk averse and thus less willing to experiment than advocates for devolution believe. Or, alternatively, program and policy experimentation may simply not be needed in this context: resources for transportation in the hands of impoverished people are. Offered discretion, states have instead provided subsidies rather than new or expanded programs. That activity has occurred primarily at the federal level with the JARC grants.

IV. JARC Assessment

Given the GAO's emphasis on measurable outcomes, it is perhaps unsurprising that so much of the discussion about JARC implementation has centered on program evaluation—even though little evaluation has actually occurred. Despite, or perhaps because of, GAO and congressional emphasis on performance, there has been little policy-level discussion of what matters in service delivery for marginalized urban populations, let alone how to measure performance. Although potentially vital as a means for targeting transit resources to areas with high concentrations of impoverished residents, the program has been limited in funding and predicated on competition between recipient agencies. Thus, it is important to delineate the problems with using conventional evaluation metrics and suggest alternative ways to think about the program's potential contributions.

To evaluate JARC projects, it is necessary to have a performance rubric. The JARC legislation clearly states its objectives: improve access to jobs and stimulate collaborative efforts to increase access to jobs. Although the legislation mentions the role of nonwork trips, JARC project applications (for non-earmarked funds) have been evaluated on employment accessibility. Unfortunately, there is little empirical evidence that increased accessibility to employment via public transit yields positive labor outcomes, either in terms of employment stability, higher wages, or increased skill levels. Instead, research suggests that access to autos, not public transit, has a stronger correlation with employment outcomes for low-income individuals.²⁰ This has also been shown for TANF recipients.²¹

The GAO, and legislators who responded to their original reports, assumed that coordinated transportation mobility and coordinated social services would lead to improved service levels, greater quality, and cost savings for impoverished workers. The FTA asks grantees to report on a few output measures that include the amount of new service provided, the number of users served, and the number (and type) of partners that were involved in projects.²² On one hand, these output measures evaluate performance relative to grant expenditure. On the other hand, the JARC legislation cites the need for increased access and mobility to enhance employment opportunities, which is an assumed outcome of the output measures. But this particular outcome is not explicitly connected to grantee reporting and performance measurement. The number of employers or jobs that are served by JARC-supported transit is not an adequate measure because it, too, is a measure of *output* and not *outcome*.

Compared with existing criteria, the evaluation criteria the FTA used for JARC recipients are overly simplistic. For example, a 1995 study identified 44 different bus route evaluation criteria transit providers used throughout the United States.²³ The performance criteria included route design, schedule design standards, economic and productivity standards, service delivery standards, and passenger comfort. Meyer and Miller also identified a comprehensive list of performance measures that are applied to transportation systems, ranging from accessibility to system preservation.²⁴ Several extend beyond public transportation to include a broader range of social, economic, and physical impacts of transportation projects. Although the stated goals of JARC are to increase access to jobs, its single measure of service coverage relative to employment locations fails to capture the many dimensions of transportation access or mobility needs of the targeted population. In addition, few transit providers have conducted evaluations of their JARC projects, perhaps because of lack of guidance, incentive, or enforcement on the part of the FTA. Thus, the FTA applies no standard program evaluation methods, making comparisons of projects across jurisdictions very difficult, if not impossible.

Given the strong call for performance standards at the outset of the program, the lack of evaluation so far could be construed as a failure of accountability. But that conclusion would be wrong. It is more likely that JARC project evaluation suffers from the same problems as the UMTA projects: traditional measures of effectiveness, such as service outputs or cost-benefit analysis, do not adequately measure things that matter to those who need the services.

For example, while previous research shows that automobile ownership exerts a stronger, more immediate effect in improving employment outcomes for welfare recipients, it may be a mistake to conclude that investments in public transit services, and in particular transit subsidies, do not lead to positive economic and social outcomes for welfare recipients. Too often, evaluations are framed in terms of either/or—transit versus cars. For low-wage workers and their families, they likely use a variety of transport modes. Day laborers, for example, use reciprocity networks extensively to obtain work-related transportation. When their or their family's car is running, they give rides; when it is not, they catch rides, take transit, or walk.²⁵ For very low wage and marginal workers, transit and cars may not be competing modes. In fact, they may be complementary modes, with household members trading off between them—needing the one in case the other fails either in service coverage or reliability. In this sense, one mode is a fail-safe and in addition to another, which is impossible to measure with simple ridership counts or other accessibility measures.

Along with the conceptual problems in measurement, performance evaluation of the JARC program suffers from operation and response bias. Performance evaluations, like surveys, tend to involve significant data collection, data management, and sophisticated analysis. Larger transit operations are more likely to have the capacity for performance measurement because the costs involved may represent a smaller proportion of overall budgets than in smaller operations. JARC grantees in a survey specifically identified evaluation and reporting as challenging for these reasons.²⁶

In addition to several GAO reports focused on program administration, FTA contracted with the Urban Transportation Center at the University of Illinois at Chicago (UIC) to evaluate JARC. Their research has included case study analyses, survey research, and spatial analyses of residential location and employment opportunities.²⁷ These analyses are handicapped primarily by the poor design of the JARC program for such data collection. The survey research and case studies are inadequate for evaluating either single or multiple JARC projects because they have no controls. Nor are they generalizable across populations served by the JARC program.

The end result: a program's effectiveness likely depends on its context, and policy analysts have little empirical evidence about the program's relative effectiveness from locale to locale.

As with the prior UMTA projects, the short funding durations for JARC awards also affect program evaluation. Even though reporting is required of JARC recipients, some may hesitate to invest in data gathering, data management systems, and analysis that the operator will only use for a short period of time. This may be a particular problem for those who received smaller grants or who lack sufficient staff to conduct or oversee data collection, analysis, or reporting.

Systems and projects also differ in how complex they are to assess. It may be easier to collect and analyze data for fixed route, scheduled services than demand-responsive services, which are idiosyncratic. Transportation systems that integrate large and small operations may need multi-level performance measures to capture the effectiveness, efficiency, and how complementary each mode or service type is.

In sum, performance evaluation falls through the cracks for a variety of reasons. First, practical problems hamper analysis, such as evaluation bias that potentially favors analysis among large agencies over small and those funded for longer spans. Second, existing transit performance measures tend to stress output or quality in a generic way. Such measures may overlook a portion of transit's performance, such as its value as a lifeline service. It can also be difficult to isolate the potential contributions of JARC projects, particularly for expanded services or transportation subsidies, within the larger context of transit and transportation that is funded through other means. In other words, it can miss the potential for network externalities. Research has demonstrated definitively that poor transit access coupled with community isolation from regional opportunities can limit employment and subsequent gains in family wealth. However, establishing which resources and changes would allow federal investment (or any investment) and policy to overcome these problems proves much more elusive.

A. JARC Program Grants

Even at the federal level, the emphasis on innovation and experimentation did not last long. From 1999 to 2001, the government funded project grants competitively. As mentioned, Congress soon after turned to earmarking and then to formulas, the current option. For those competitively awarded projects from 1999 to 2001, we obtained data from the FTA for 21 different project types shown in Table 2. The project titles and descriptions show that some projects were to create services, while others expanded existing services. In some cases we had difficulty determining which. In addition, nearly three-quarters of the applicants proposed at least three project activities as part of the grant (see Table 3). Applicants most frequently proposed new or expanded fixed-route services, followed by demand-responsive service and ride-sharing programs. Although only five applicants proposed to create voucher programs, these were among the larger projects proposed, with the average amount approximately \$600,000. We also obtained JARC funding data from the American Public Transportation Association. With that data, we compared funding by state from 1999 to 2006.

In surveying the projects that were funded at the federal level, we find that the agencies seeking funding from JARC benefited at least in part from the nearly 30 years of research on urban structures, transit accessibility, and spatial mismatch. Almost none of the grant applications sought funding for single, fixed-route transit service expansion, which research showed was often ineffective. Rather, applicants usually sought to fund several, combined complementary services. Because existing, fixed-route transit services do not frequently serve impoverished women or their children, the applicants often assembled a web of services. The approach was promising, even if the funding levels were unpredictable for agencies that attempted to put together a package of services for welfare recipients.

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Table 2. Summary of JARC Project, 1999-2001

JARC Project Activity/Service Type Provided	Average \$ Amount	Frequency	Percentage of Total ²
Demand Response ¹	\$423,558	89	19.6%
Demand Response Creation	366,825	62	13.7
Demand Response Expansion	586,330	29	6.4
Fixed Route ¹	379,820	268	59.2
Fixed Route Creation	383,531	160	35.3
Fixed Route Service Expansion	382,577	165	36.4
Guaranteed Ride Home ¹	545,884	32	7.1
Guaranteed Ride Home Creation	563,310	28	6.2
Guaranteed Ride Home Expansion	423,900	4	0.9
Hire / Train Employees & Residents	386,589	24	5.3
Outreach/ Awareness / Marketing	448,202	96	21.2
Purchase Vehicle	395,329	23	5.1
Purpose - Job Access	383,839	238	52.5
Purpose - Link Services (e.g. childcare, employment, human services)	345,646	77	17.0
Ride Share / Vanpool Creation	423,636	67	14.8
Ride Share/ Vanpool Expansion	409,369	21	4.6
Ride Share/ Vanpool ¹	417,498	86	19.0
Vague / Missing Information	405,383	48	10.6
Voucher Program Creation	608,588	5	1.1
Vague / Missing Information	405,383	48	10.6
Total		453	

¹ Could not ascertain if the project was to create or expand service

² Does not sum to 100 percent because most projects include multiple activities

Table 3. Number of JARC Activities per Proposed Project

Number of Activities	Average \$ Amount	Frequency	Percentage of Total
1	\$466,389	69	15.2%
2	265,063	56	12.4
3	303,318	150	33.1
4	342,264	81	17.9
5	447,517	45	9.9
6	492,739	28	6.2
7	695,285	11	2.4
8	575,334	7	1.5
9	777,125	4	0.9
10	1,000,000	1	0.2
Total	375,796	453	

B. JARC Funding Levels

Thus far, no analysis has examined the overall reach of JARC project funding, either in relation to overall national public transportation or to the program's relative contribution at the transportation system level. Table 4 shows JARC funding from 1999 to 2005 by state and year. During that time, JARC represented only about 1 percent of public transportation spending. JARC funds were a large proportion of state public transportation spending only in states with relatively small public transportation operations, such as Vermont, Oklahoma, and Alabama.

Such small grants, averaging \$400,000 to \$1,200,000 between 1999 and 2005, and for short durations (JARC initially disallowed multiyear grants), may have limited effectiveness. The average grant was less than what a mid-sized transit operation spends on wages in a year (See Tables 5 and 6). Although the JARC program was to provide "seed" funds to leverage innovative partnerships to increase employment accessibility, it is unclear that transit companies would have sufficient resources to continue programs begun under JARC without cutting others. In the new formula-based funding regime, transit funds targeted to states with more welfare recipients still represent a comparatively small amount of overall transit funding.

FTA has supplied non-JARC funding for new or expanded service for 16 projects with Full Funding Grant Agreements (FFGAs) in 2007. These 16 projects will share \$571.9 million, or approximately \$36 million per project, on average. Although these are large capital projects, the average annual capital expense among U.S. transit operators from 1999 to 2004 was \$4 million, with an average annual operating expense of \$32 million (in current dollars).²⁸ The \$720,000 average JARC project funding is therefore the equivalent of 2 percent of a New Start program FFGA, 18 percent of average capital expenses, and 2 percent of average operating expenses. Figure 1 shows that JARC only represents 2 percent (\$156 million) of FTA's 2007 annual budget of \$8.875 million.

Table 4 shows that over the six-year period from 1999 to 2005, JARC provided more than \$611 million in grants distributed to the states. The amounts varied from \$0.01 per capita in Nebraska to \$1.41 per capita in Alaska. In terms of the JARC funds per persons in poverty, Mississippi, among the states with the highest poverty rates, received the least at \$0.07 per year, and Alaska received the most at \$15.05 per year.²⁹ There is, in fact, a statistical correlation between a state's transit spending rank (as a percentage of state spending on transit) and a state's poverty ranking. Although it might seem logical that states with high poverty should receive more program funding, many of the poorest states have large rural populations with little existing public transit. States such as Mississippi, Arkansas, New Mexico, Louisiana, Kentucky, and Tennessee spend far below the national average on public transportation, primarily because their significant rural populations are difficult to serve by traditional public transportation services.

However, the ostensible point of devolution, and its influence on JARC program design, was to help states develop the types of locally tailored programs that would serve impoverished residents in each state's unique urban and rural makeup. Without foresight, programs and policies that stress devolution can favor locations with *existing* capacity for service delivery rather than helping places *develop* the capacity.

Most of the JARC projects proposed fixed-route service extensions or enhancements. The funding structure of JARC is largely responsible for these approaches as it offers only small grants for a limited time duration (one year). Therefore, it is unlikely that low density, flexible systems will be successful or sustainable using JARC funding. The problem, however, may be less a question of capacity than desire. Just because transportation funding is available does not mean that states will perceive a need for the funding. States may not respond to federal agenda-setting in transit funding because local constituencies do not value it. However, such funding can redefine access to opportunity, either through mobility or other means, as a civil right protected through federal policy and resources. Thus, mobility programs for impoverished workers can become an optional strategy for states rather than a necessity that states design according to their special needs.

To address the disparity in JARC grant allocations, 2005's Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) changed the program from a discretionary program to a formula basis. The formula is also tiered to the size of urbanized areas as well as

to specific allocations for nonurbanized areas. With the new system, there is far less variation on a per capita basis. The average per capita rate for states is approximately \$0.43 cents and \$3.68 per person in poverty. However, states with higher poverty rates are spending even less per person in poverty than before the formula change. This change could reflect that, with formula funds guaranteed, states have had less need to pursue project funding. It may also reflect a rise in the number of persons in poverty during the time period such that JARC resources are spread across a larger segment of the population than before.

Ultimately JARC funding has paralleled the vicissitudes of recent federal politics of transportation funding more generally: the push for innovation through devolution, the pushback from localities seeking the security of earmarks, the backlash against the earmarks, then toward the programmatic security of formula funding. In sum, the trajectory has resulted in JARC becoming an additional funding source, largely spent on transit programs and transportation subsidies that are distributed according to the number of welfare recipients in a state. The program retains much of its original focus on coordinated services and local design. Along with the clustering around fixed-route service provision and transport subsidies among states and grantees, this fund's trajectory adds to the growing body of evidence from the JARC program that its primary benefits have not derived from devolution or experimentation per se, but from the additional resources it made available to both human service and transit agencies, and to a much smaller degree, community- and employer-based programs.

“The federal politics of transportation funding have resulted in JARC becoming an additional funding source, largely spent on transit programs and transportation subsidies that are distributed according to the number of welfare recipients in a state.”

Table 4. Summary of JARC Funding by State (only states receiving funds) 1999-2005, and 2006

State	1999-2005 Total	Annual Per Capita	Per Person in Poverty	2006 Funding	2006 Per Capita	JARC as Per Person in Poverty	Percentage of State Transit Dollar (Rank)	Percent in Poverty (Rank)
Alaska	\$6,209,387	\$1.41	\$15.05	\$207,503	\$0.33	\$3.52	6.0% (5)	9.4% (37)
Alabama	19,228,887	0.62	3.84	2,391,281	0.54	3.34	12.0 (3)	16.1% (6)
Arkansas	2,301,497	0.12	0.78	1,406,220	0.53	3.33	3.1 (1)	15.8% (7)
Arizona	5,916,898	0.16	1.19	2,646,131	0.52	3.71	0.5 (6)	13.9% (14)
California	46,829,747	0.20	1.39	19,573,127	0.58	4.07	0.2 (44)	14.2% (12)
Colorado	5,852,445	0.19	2.09	1,670,641	0.39	4.18	0.4 (41)	9.3% (38)
Connecticut	19,061,405	0.80	10.12	1,126,113	0.33	4.19	2.5 (14)	7.9% (45)
District of Columbia	22,864,242	5.71	28.27	379,168	0.66	3.28	0.5 (37)	20.2% (1)
Delaware	4,418,522	0.81	8.76	263,929	0.34	3.66	1.4 (20)	9.2% (40)
Florida	19,386,232	0.17	1.39	8,292,479	0.52	4.15	0.5 (39)	12.5% (18)
Georgia	9,231,724	0.16	1.24	3,726,294	0.46	3.50	0.4 (40)	13.0% (17)
Iowa	9,361,093	0.46	5.02	1,034,427	0.35	3.88	4.4 (9)	9.1% (41)
Idaho	300,000	0.03	0.28	629,153	0.49	4.12	0.7 (27)	11.8% (22)
Illinois	11,645,014	0.13	1.25	5,042,471	0.41	3.79	0.1 (45)	10.7% (27)
Indiana	8,542,718	0.20	2.11	2,303,911	0.38	3.99	1.2 (21)	9.5% (35)
Kansas	10,466,283	0.56	5.62	927,663	0.35	3.49	9.3 (4)	9.9% (32)
Kentucky	6,192,575	0.22	1.39	1,844,076	0.46	2.89	1.5 (18)	15.8% (8)
Louisiana	7,149,267	0.23	1.17	2,888,701	0.65	3.30	0.8 (24)	19.6% (3)
Massachusetts	12,896,325	0.29	3.12	2,325,356	0.37	3.94	0.2 (43)	9.3% (39)
Maryland	23,053,601	0.62	7.32	1,774,151	0.33	3.94	1.0 (23)	8.5% (43)
Maine	2,443,954	0.27	2.51	505,003	0.40	3.63	3.4 (10)	10.9% (26)
Michigan	15,225,912	0.22	2.08	3,979,218	0.40	3.81	0.7 (30)	10.5% (31)
Minnesota	8,631,602	0.25	3.17	1,414,253	0.29	3.64	0.5 (34)	7.9% (46)
Missouri	25,783,051	0.66	5.63	2,233,393	0.40	3.41	2.0 (15)	11.7% (23)
Mississippi	273,096	0.01	0.07	1,457,627	0.51	2.57	0.5 (33)	19.9% (2)
North Carolina	3,709,416	0.07	0.54	3,355,608	0.42	3.39	0.6 (32)	12.3% (19)
North Dakota	818,155	0.18	1.53	291,404	0.45	3.81	2.8 (12)	11.9% (20)
Nebraska	131,925	0.01	0.11	561,622	0.33	3.38	0.1 (46)	9.7% (33)
New Hampshire	368,534	0.04	0.66	352,447	0.29	4.39	1.4 (19)	6.5% (47)
New Jersey	21,824,616	0.37	4.36	2,838,709	0.34	3.97	0.3 (42)	8.5% (44)
New Mexico	9,796,902	0.77	4.18	1,094,686	0.60	3.27	5.6 (8)	18.4% (4)
Nevada	4,277,992	0.31	2.91	857,434	0.43	4.09	0.7 (29)	10.5% (30)
New York	25,291,843	0.19	1.30	9,760,182	0.51	3.52	0.1 (47)	14.6% (11)
Ohio	18,927,603	0.24	2.25	4,425,095	0.39	3.68	0.6 (31)	10.6% (28)
Oklahoma	25,102,930	1.04	7.07	1,625,985	0.47	3.21	13.9 (2)	14.7% (10)
Oregon	11,743,583	0.49	4.23	1,467,897	0.43	3.70	0.7 (28)	11.6% (24)
Pennsylvania	50,909,877	0.59	5.38	5,022,975	0.41	3.72	0.8 (26)	11.0% (25)
Rhode Island	9,259,453	1.26	10.60	466,849	0.45	3.74	2.6 (13)	11.9% (21)
South Carolina	3,789,830	0.13	0.96	1,872,308	0.47	3.31	1.9 (16)	14.1% (13)
South Dakota	247,815	0.05	0.36	312,746	0.41	3.14	0.8 (25)	13.2% (16)
Tennessee	30,377,115	0.76	5.65	2,670,486	0.47	3.48	5.6 (7)	13.5% (15)
Texas	24,122,404	0.17	1.07	12,423,907	0.60	3.87	0.5 (38)	15.4% (9)
Virginia	9,552,741	0.19	2.01	2,553,291	0.36	3.76	1.0 (22)	9.6% (34)
Vermont	4,671,188	1.10	11.66	186,885	0.31	3.27	17.1 (1)	9.4% (36)
Washington	26,433,100	0.64	6.04	2,479,628	0.42	3.97	0.5 (35)	10.6% (29)
Wisconsin	21,995,959	0.59	6.73	1,887,559	0.35	4.05	1.7 (17)	8.7% (42)
West Virginia	5,256,849	0.42	2.32	1,059,097	0.59	3.27	5.7 (6)	17.9% (5)
Total	\$611,875,307	\$0.32	\$2.55	\$127,609,089	\$0.46	\$3.72	4.5%	12.7%

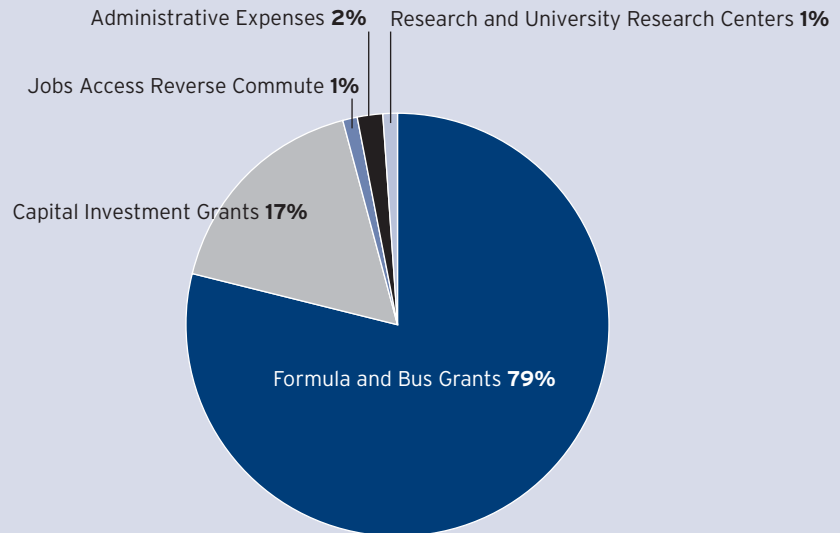
Table 5. Average Expenditures by Type and Transit Agency Size (in \$ thousands)

Quintile*	Wages	Fringe	Services	Supplies	Insurance	Purchased	Other	Total**
1	\$185.6	\$57.4	\$32.9	\$58.6	\$19.4	\$132.6	\$21.6	\$514.3
2	625.0	210.6	108.8	178.8	60.1	483.9	52.8	1,742.9
3	1,619.6	653.1	222.8	425.9	141.9	987.9	98.4	4,200.9
4	3,550.8	1,579.6	569.3	962.3	292.1	3,377.8	246.1	10,695.3
5	73,717.3	41,884.8	9,440.8	14,979.8	3,805.4	14,761.3	2,557.1	158,779.4
Total	\$16,130.0	\$8,985.9	\$2,099.1	\$3,359.4	\$873.5	\$3,984.3	\$601.6	\$35,593.8

Table 6. Average Percentage Expenditures by Type and Transit Agency Size

Quintile*	Wages	Fringe	Services	Supplies	Insurance	Purchased	Other
1	36.5%	11.3%	6.5%	11.5%	3.8%	26.1%	4.3%
2	36.3	12.2	6.3	10.4	3.5	28.1	3.1
3	39.0	15.7	5.4	10.3	3.4	23.8	2.4
4	33.6	14.9	5.4	9.1	2.8	31.9	2.3
5	45.7	26.0	5.9	9.3	2.4	9.2	1.6
Total	44.8%	24.9%	5.8%	9.3%	2.4%	11.1%	1.7%

Figure 1. 2007 Federal Transit Administration Budget



Source: <http://www.gpoaccess.gov/usbudget/>

V. Implications

Several interesting issues emerge from this examination of JARC, particularly following the UMTA projects of the 1960s and 1970s. The stated objectives—increasing physical access to jobs and increased service collaboration—align poorly with the significant research on transportation mobility among low-income workers. That research emphasizes, that to be effective, access must be to more than just work destinations and should focus on social access more generally. A focus on access to jobs alone oversimplifies the planning involved and hinders effective project evaluation.

An emphasis on service coordination may be valuable in reinforcing the need for human service participation in transportation planning, but it further complicates the evaluation process and seems to have become an end in itself rather than a means to increase service quality and provide new information. Because of the organizational complexities of coordination and collaboration efforts, JARC collaborations have largely yielded subsidy programs that require little state-level time investment in the collaboration.

The JARC program design also has not advanced federal policy beyond the lessons learned from previous federal transportation projects targeting low-income workers. Efforts targeting a specific segment of transit riders (such as the unemployed or underemployed) are unlikely to become self-sustaining financially given the expense associated with services, such as demand responsiveness, route deviation, fare collection technologies, and traveler information dissemination, and the comparatively small number of the total traveling public to which the programs are targeted in a given region.

The JARC program funding did have broad reach throughout the United States, primarily by funding many small projects instead of just a few large projects. Such reach was enhanced when JARC moved to a formula-driven program allocating funds to states based on the number and proportion of low-income persons within each state. However, as demonstrated, the grants are relatively small relative to the costs associated with operating a public transportation system. In addition to their size, JARC grants have been criticized for their short durations—a criticism that plagued the UMTA demonstration projects as well.

Despite these problems, advocates for low-income workers, environmental justice, and public transportation have supported the program, and for good reasons. Low-income individuals, people of color, and immigrants are among the most important constituency of U.S. transit riders. The history of public transportation, however, shows that transit service delivery has been more a function of metropolitan land uses (i.e., housing and employment density) in the urban core, urban expansion, and opportunities primarily for elite groups. For instance, “street car suburbs” around Los Angeles and Atlanta primarily enable white suburbanization and homeownership. Public transit in these cases helped to segregate metropolitan areas, with downtown commerce and low-income residents in the core and working class and affluent commuters on the periphery.

People of color and impoverished workers now form an integral core of patronage along with elderly and disabled riders. Yet transit performance measures tend to treat contemporary transit riders as a monolithic group rather than a group with important distinctions in needs, preferences, and service quality driven by the geographic distribution of services, let alone treating them as a group that merits high priority in planning, funding, and design. JARC sets resources aside for transit operations specifically to provide for low-income riders—funding that cannot be cannibalized for other uses when budgets are tight or where civil rights lawsuits have demonstrated a growing impatience among transit’s underserved core riders toward agencies’ attempts to extend services or capture new riders.

Federal transportation policy for impoverished Americans has been small-scale, scattershot, and subjected to unrealistic expectations and judgments, as have most policies such as schools, health, or food security designed to ensure social justice. Nonetheless, the JARC program can be an important step forward if:

“Federal transportation policy for impoverished Americans has been small-scale, scattershot, and subjected to unrealistic expectations and judgments.”

1. Program supporters and research can develop service and accountability measures that make sense by reflecting the goals of establishing regional economic and social opportunity for low-income individuals given the realities of how people actually use and rely on services.
2. Low-income communities and communities of color play an important role in planning and programming for JARC funds, both as designers and consumers of transport services, and
3. The federal policy changes the role of evaluation to seeking whether funding levels are adequate to accomplish overall mobility goals, not just as a means for small grants oversight.

If the next iterations of JARC fails to address these three issues, federal policy risks repeating the mistakes of the UMTA programs from forty years ago. Transportation has become a key issue for many civil rights and environmental justice organizations. As such, the opportunities are greater than ever for federal policy to support local, deliberative planning for mobility.

VI. Conclusions

It is challenging to determine whether JARC has been effective and whether funding levels have been sufficient. Despite a recent report stating that JARC provides access to 43.4 million jobs (21.2 of which are low wage jobs), JARC's value remains unknown because in most cases the projects are extensions to existing service, and If it were not for these existing services, many of the JARC projects would not be possible.³⁰ The real question is why an additional program such as JARC is needed to supplement transit systems that should already be serving low-income populations and employment destinations—particularly when low-income persons are the core ridership of public transit. In addition, employment locations represent the bulk of home-based destinations. Is JARC simply a Band-Aid[®] applied to transit systems that do not provide adequate employment access or service coverage? Are not recommendations for improved performance measures for JARC just as relevant and applicable to the overall transit system?

Although this report points to the difficulties of evaluating the JARC program with quantitative measures, another way of evaluating it is to assess the impact the proposal has had on how policymakers and planners view the issue of job access. JARC, and advocates for the program, have slowly and incrementally pushed the relationship between access to transportation and poverty into the broader debate over how transportation systems should be built to best serve the needs of all residents, including low-income and minority residents underserved by usual transportation priorities. Transit planning could benefit generally if mandated coordination with human service providers were included as part of the federal legislation.

Some argue that car ownership programs have the greatest potential to meet the mobility needs of low-income persons. Yet the question remains how federal policy, and alternative private-sector approaches, can build a complementary relationship between public transportation and auto ownership that does little harm to the income and assets of low-income persons. Advocates for auto ownership programs often fail to acknowledge the significant financial burdens associated with owning a car. Recent analyses show that low-income, working families spend between 54 and 70 percent of household income on transportation and housing.³¹

Even today, policies to enhance mobility among low-income groups face a difficult choice between fostering automobile access and investing in public transit or place-based job development that creates transit- or walk-accessible opportunities comparable to auto-accessible opportunities for low-wage workers.³² If the latter option fails or takes a long time, the policy can perpetuate lower job accessibility among low-income workers and impoverished communities, who need opportunities *now* in existing urban contexts. This option is not widespread and perhaps not politically feasible, despite having potential benefits beyond cash assistance programs. In contrast, an automobile access policy may work to alleviate barriers to employment, but it would do so at the risk of continuing auto dominance in the United States, which can be costly for impoverished families and their environments.

“In planning for increased urbanization, it is important to both economic vitality and social justice that impoverished communities and communities of color have access to opportunity writ large, including social, economic, environmental, and educational opportunities.

Urban poverty and transportation mobility barriers are not unique to the United States. Many European countries are confronting sprawl and expanding metropolitan regions in ways that put carless households at a disadvantage. Although differences exist in geographic scale, auto ownership costs, transit availability and connectivity, the challenge remains to provide access to not only work locations but also other nonwork locations. Researchers from Western Europe have acknowledged that public transportation is an inferior solution to employment access for low-income persons. As regions continue to expand, cars appear to be the only way to span these ever increasing distances.³³ These researchers therefore distinguish between car dependence and “locality dependence.”³⁴ Locality dependence emphasizes sustainable development and land uses that meet local household needs beyond just access to jobs.

Some have argued that public transportation has historically been a means to address social goals by, for example, redistributing income via transit service and subsidized transportation.³⁵ However, with the exception of UMTA and JARC, federal policy has never treated mobility as method of protecting civil rights. Rather, transportation, and in particular public transit, has been a means to an end: congestion relief, environmental improvements, and with UMTA and JARC, a way to reduce welfare dependency and unemployment. Employment access has always dominated transit system design and planning, a goal that can benefit employers more than workers, particularly when transit connects low-skilled workers facing the end of their public income support to minimum- or low-wage jobs.³⁶ Ironically, transit investment has been stigmatized as a “handout” for those without cars rather than a support to businesses needing low-wage workers. These are the sorts of ideological and conceptual double standards that serve to undermine support for both impoverished families and their potential employers.

As U.S. metropolitan regions continue to grow and sprawl, we need better mobility and housing strategies for all urban residents. In planning for increased urbanization, it is important to both economic vitality and social justice that impoverished communities and communities of color have access to opportunity writ large, including social, economic, environmental, and educational opportunities. For the last century, social and economic exclusion has been built into the structure of U.S. cities, to the detriment of entire regions. For the past 30 years, federal mobility policies and programs for the impoverished, while acknowledging economic isolation as a problem, have been inconsistent, whipsawed between competing political claims, and expected to deliver government innovation in an environment of comparative funding scarcity. In both UMTA and JARC, the dominant policy discussion has centered on their costs rather than on their *adequacy*. The language of performance evaluation and policy has served a political need to provide mobility to work at the lowest possible cost to avoid the appearance of largesse and inefficiency rather than to forge an inclusionary urban structure and society in the spirit of civil rights. To the extent that these programs have not flourished, they reflect failures in vision and leadership, not the intractability of social inclusion as a goal for mobility policy.

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