

Impacts of More Rigorous ADA Paratransit Eligibility Assessments on Riders with Disabilities

Project #BD549-44

REVISED DRAFT FINAL REPORT

Prepared for the
Florida Department of Transportation
Research Center



Prepared by the
National Center for Transit Research
Center for Urban Transportation Research
University of South Florida



May 2009

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USF CENTER FOR URBAN TRANSPORTATION RESEARCH

1. Report No.	2. Government Accession No.	3. Recipient's Catalog No.	
4. Title and Subtitle Impacts of More Rigorous ADA Paratransit Eligibility Assessments on Riders with Disabilities		5. Report Date May 2009	
		6. Performing Organization Code	
7. Author(s) Deborah Sapper, Jay Goodwill, and Holly Carapella		8. Performing Organization Report No. 2117-77721-00	
9. Performing Organization Name and Address National Center For Transit Research (NCTR) Center for Urban Transportation Research University of South Florida – CUT100 4202 East Fowler Avenue, Tampa, FL 33620		10. Work Unit No. (TRAVIS)	
		11. Contract or Grant No. BD 549-44	
12. Sponsoring Agency Name and Address Office of Research and Special Programs (RSPA) U.S. Department of Transportation, Washington, D.C. 20590 Florida Department of Transportation 605 Suwannee Street, MS 26, Tallahassee, FL 32399		13. Type of Report and Period Covered Final Report	
		14. Sponsoring Agency Code	
15. Supplementary Notes			
16. Abstract Due to the ever-increasing demand for complementary ADA paratransit trips, transit agencies have instituted a number of actions related to reducing the costs of this type of service, including steps to limit the demand through stricter and more complex ADA paratransit eligibility processes. The objective of this research was to document the changes the transit systems made to their ADA paratransit eligibility procedures and to determine the impacts these changes have had on riders with disabilities. The research report provides a brief history and overview of the ADA complementary paratransit regulations and services; summarizes increased demand and related agency ADA paratransit expenditures; documents recent trends and changes in the ADA complementary paratransit eligibility processes; and provides a summary of the best practices related to ADA paratransit eligibility procedures.			
17. Key Word Public transportation, complementary paratransit services, paratransit, ADA eligibility process		18. Distribution Statement Available to the public through the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, VA 22161, (703) 487-4650, http://www.ntis.gov/ , and through the NCTR web site at http://www.cutr.usf.edu/	
19. Security Classif. (of this report) Unclassified	20. Security Classif. (of this page) Unclassified	21. No. of Pages 82	22. Price No Cost

EXECUTIVE SUMMARY

Due to the ever-increasing demand for complementary ADA paratransit trips, transit agencies have instituted a number of actions related to reducing the costs of this type of service, including steps to limit the demand through stricter and more complex ADA paratransit eligibility processes.

The disability community has expressed concern over the stricter and more stringent ADA paratransit eligibility determination processes, fearing the loss of mobility for people with disabilities who may find the new procedures cumbersome to comply with or who may be ruled ineligible for the ADA paratransit services.

There have been anecdotal reports that the widespread changes to the nation's transit systems ADA paratransit eligibility procedures have negatively impacted some segments of the disability community. However, there has been minimal research to document the practices being used, the resulting changes of these practices on ridership, the impacts on riders with disabilities who have been denied service, or what other mobility alternatives are available to those individuals.

The objective of this research was to document the changes that transit systems made to their ADA paratransit eligibility procedures and to determine the impacts these changes have had on riders with disabilities. The research report provides a brief history and overview of the ADA complementary paratransit regulations and services; summarizes increased demand and related agency ADA paratransit expenditures; documents recent trends and changes in the ADA complementary paratransit eligibility processes; and provides a summary of the best practices related to ADA paratransit eligibility procedures.

This report summarizes the findings of the major project tasks: a literature review; documentation of industry regulations, issues and trends in ADA paratransit eligibility procedures; an overview of the existing industry practices; presentation of the findings of selective case studies; and a conclusion, with presentation of best practices related to the ADA paratransit eligibility process.

An early task in this research effort was to conduct a literature review of previous studies, reports, and research related ADA paratransit eligibility and present a discussion of the processes, issues, and trends.

During the research effort, Florida and national public transit agencies were consulted to identify current industry practices. The purpose of this effort was to identify how transit

agencies have reacted to and adapted their American with Disabilities Act (ADA) paratransit eligibility process as demand for services grew, resulting in higher costs for service.

This effort used a survey instrument that was distributed in February 2008 to a sample of 110 fixed-route transit systems across the country that operate complementary ADA paratransit services. Chapter Three provides a review and summary of the relevant findings organized around the survey's seven eligibility certification procedures and practices categories. Responses were received from 39 agencies, for an overall response rate of approximately 39 percent.

Building upon the previous tasks, 10 transit agencies that responded to the survey that represent various size systems and geographic distribution were selected for in-depth interviews and case studies. Chapter Four provides a summary of these interviews, organizing the findings by the following categories: Overview of Agency Approach; Certification Process; ADA Policies and Process; and Alternative Mobility Options.

At the conclusion of the literature review, an examination of trends and issues, a survey of national transit agencies, and more extensive follow-up interviews with representative transit systems showed that, in the opinion of the researchers, no evidence or observations indicated that segments of the disability community were unfairly denied ADA complementary paratransit services or were unfairly subject to the loss of mobility due to the new ADA paratransit eligibility procedures implemented by some of the agencies.

There was one common observation that many of the respondents shared that might explain the appearance of potential loss of mobility options for segments of the disabled community. As the transit agencies made changes to the application forms and process, it was observed that a significant number of potential applicants and existing eligible clients seeking recertification who initiated the ADA paratransit eligibility process did not complete the application process. In such cases, the potential applicants self-selected not to continue by not formally submitting an application. The consensus among the transit professionals was that this was a result of better information contained in the application packets and outreach efforts that explained the purpose of the ADA complementary paratransit service and more detailed information on other mobility options offered by the transit agencies.

The changes to the ADA complementary paratransit eligibility process varied from agency to agency. Changes to the process that were made reflected the maturing of the eligibility

process, the sharing of experiences among the transit industry, and guidance and research provided by groups such as Project ACTION.

While budgetary pressures provided a strong incentive for agencies to examine their ADA complementary paratransit services, the transit agencies have approached the challenge in a professional and compassionate manner. Several innovative and comprehensive practices were observed during this research effort that reflected this comprehensive approach that tries to determine ADA paratransit eligibility in an objective manner, providing safeguards through independent assessments and appeal processes. Additionally, transit agencies have made significant strides in improving the accessibility to mainstream transit services, allowing many in the disabled community to access the regular transit services. Travel training and financial incentives have become common components to encourage greater use of mainstream (i.e., fixed-route) transit services.

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CHAPTER ONE PROJECT OVERVIEW

PROJECT OVERVIEW

Due to the ever-increasing demand for complementary Americans with Disabilities Act (ADA) paratransit trips, transit agencies have instituted a number of actions related to reducing the costs of this type of service, including steps to limit the demand through stricter and more complex ADA paratransit eligibility processes.

The disability community has expressed concern about the stricter and more stringent ADA paratransit eligibility determination processes, fearing the loss of mobility for people with disabilities who may find the new procedures cumbersome to comply with or who may be ruled ineligible for the ADA paratransit services.

There have been anecdotal reports that the widespread changes to the nation's transit systems' ADA paratransit eligibility procedures have negatively impacted some segments of the disability community. However, there has been minimal research to document the practices being used, the resulting changes of these practices on ridership, the impacts on riders with disabilities who have been denied service, or what other mobility alternatives are available to those individuals.

The objective of this research was to document the changes that transit systems made to their ADA paratransit eligibility procedures and determine what impacts these changes have had on riders with disabilities. The report provides a brief history and overview of ADA complementary paratransit regulations and services, summarizes increased demand and related agency ADA paratransit expenditures, documents recent trends and changes in the ADA complementary paratransit eligibility processes, and provides a summary of the best practices related to ADA paratransit eligibility procedures.

REPORT ORGANIZATION

This report summarizes the findings of the major project tasks: a literature review; documentation of industry regulations, issues, and trends in ADA paratransit eligibility procedures; an overview of the existing industry practices; presentation of the findings of selective case studies; and a conclusion, with presentation of best practices related to the ADA paratransit eligibility process. This material is organized as follows:

Chapter Two – ADA Paratransit Eligibility Assessments Background and Trends - Chapter Two provides a summary of the review of previous studies and research related to ADA paratransit eligibility and presents a discussion of the processes, issues, and trends.

Chapter Three – Overview of Existing Practices for ADA Paratransit Eligibility - An element of the research was to identify how transit agencies have reacted to and adapted their ADA paratransit eligibility processes as demand for services grew, resulting in higher costs for service. This effort used a survey instrument distributed in February 2008 to a sample of 110 fixed-route transit systems across the country that operates complementary ADA paratransit services. Chapter Three provides a review and summary of the relevant findings organized around the survey's seven eligibility certification procedures and practices categories. Responses were received from 39 agencies, for an overall response rate of approximately 35 percent.

Chapter Four – ADA Paratransit Eligibility Case Studies - Chapter Four builds on the previous chapters by selecting 20 agencies who responded to the survey that represent various size systems and geographic distribution for in-depth interviews and case studies. This chapter provides a summary of these interviews, with findings organized by the following categories:

- Overview of Agency Approach
- Certification Process
- ADA Policies and Process
- Alternative Mobility Options

Chapter Five – Conclusion and Summary of Best Practices - Building on the previous four chapters, Chapter Five concludes that no evidence or observations were uncovered that indicate that segments of the disability community were unfairly denied ADA complementary paratransit services or were subject to the loss of mobility due to the new ADA paratransit eligibility procedures implemented by some of the agencies. Additionally, some proactive and compassionate practices instituted concurrently by the transit agencies with their eligibility process changes were discovered. This chapter provides a summary of these practices and policies.

Appendix – Survey of ADA Paratransit Eligibility Certification - The survey instrument used to gather information from the transit agencies is included in the appendix. The administration of this survey and presentation and interpretation of the survey findings are presented in Chapter Three.

CHAPTER TWO

ADA PARATRANSIT ELIGIBILITY ASSESSMENTS

BACKGROUND AND TREND

OVERVIEW

This chapter summarizes two of the preliminary tasks of this research effort – a literature review of previous studies related to ADA paratransit eligibility and discussion of the processes, issues, and trends of how transit agencies have adapted to the regulations and addressed the issues related to increasing costs of service and the paratransit eligibility process. Both tasks helped to develop the foundation for the balance of the research project.

The literature review and review of current processes, issues, and trends allowed the researchers to become more familiar with topics related to paratransit eligibility assessments and also provided guidance in preparation for the development of a survey instrument used to ascertain how transit agencies have reacted to and adapted their ADA paratransit eligibility process as costs of service rose and demand for services grew.

LITERATURE REVIEW

Extensive literature searches were conducted using the TRIS literature database made available from the Transportation Research Board and the resource library at the USF Center for Urban Transportation Research (CUTR). Every attempt was made to obtain and review the most current literature available. All literature was reviewed for relevancy to the topic and summarized.

The results of this literature review have been synthesized into three major categories of paratransit eligibility issues: the history of paratransit regulations and services, definitions of ADA paratransit eligibility, and the trends and changes seen in the paratransit eligibility process.

ADA PARATRANSIT REGULATIONS: A BRIEF HISTORY

The Americans with Disabilities Act of 1990 (ADA) provided a comprehensive framework and approach for ending discrimination against persons with varying types of disabilities. While the ADA addressed many types of discriminatory practices in the areas of employment, housing, communication, recreation, health services, and education, this report focuses on the impact on public transportation and the transit providers that provide critical transportation services to

the public. Regarding public transportation, the ADA was aimed at removing barriers so as to provide equal opportunities for all riders regardless of disability by requiring transit agencies to provide complementary paratransit service for those individuals who were unable to use accessible fixed-route services due to disability.

When the U.S. Department of Transportation's *ADA Paratransit Handbook* was first issued in 1991, its objective was to provide a framework for transit agencies on how to implement the complementary paratransit service requirements of the Act. After providing an overview of the law, the Handbook provided background on when complementary paratransit service was required, to whom it must be provided, the level of service required by the agency, and how and when the complementary service was to be provided. The next few paragraphs provide a brief overview of the materials contained in the Handbook in response to the ADA of 1991.

SERVICE REQUIREMENTS

The Handbook stated that complementary paratransit service must be provided where fixed-route service is available. However, the legislation noted that paratransit service should be applied only to designated public transportation and exempted commuter rail and intercity rail services. A second distinction noted that complementary paratransit service is required only if the fixed-route service is operated by a public entity and is available to the general public.

PARATRANSIT ELIGIBILITY

The Handbook outlined three categories of eligibility for complementary paratransit service. Anyone falling into one of the three categories was considered ADA paratransit eligible. Once determined eligible, a transit agency must establish an individual process for determining ADA paratransit eligibility. The categories include:

Category 1

Any individual with a disability who is unable, as the result of a physical or mental impairment (including a vision impairment), and without the assistance of another individual (except the operator of a wheelchair lift or other boarding assistance device), to board, ride, or disembark from any vehicle on the system which is readily accessible to and usable by individuals with disabilities.

Category 2

Any individual with a disability who needs the assistance of a wheelchair lift or other boarding assistance device and is able, with such assistance, to board, ride, and

disembark from any vehicle which is readily accessible to and usable by individuals with disabilities if the individual wants to travel on a route of the system during the hours of operation of the system at a time, or within a reasonable period of such time, when such a vehicle is not being used to provide designated public transportation on the route.

Category 3

Any individual with a disability who has a specific impairment-related condition which prevents such individual from traveling to a boarding location or from a disembarking location on such system.

SERVICE CRITERIA

The Handbook stated that transit providers are charged with providing complementary paratransit programs that gave paratransit patrons a service comparable to that provided on the fixed-route system. Six criteria appear in the original rule. These criteria state that paratransit service must operate in the same service area as the fixed-route system, have a comparable response time for service, have fares comparable to that of the fixed-route service, have service hours and days comparable to that of the fixed-route service, not deny trips based on trip purpose, and not limit paratransit service because of capacity constraints.

PLAN FOR PROVIDING SERVICE

For transit agencies to meet the requirements for the provision of complementary paratransit service, the Handbook outlined timelines in which transit agencies were required to provide plans on how they would meet the provisions in a timely manner. The original legislation required transit agencies to submit service plans by January 26, 1992, and six months later to cover contiguous service areas for agencies working jointly. In addition to the submitting the plan, there was a requirement for public participation. Finally, transit agencies were required to implement all phases of the plan as soon as possible, but no later than January 26, 1997. In other words, transit agencies were provided a period of five years to meet all the requirements of providing complementary paratransit service.

While the Handbook was the initial guiding document for transit agencies, two years later the *ADA Paratransit Eligibility Manual* was published. The Manual was developed in response to questions regarding eligibility standards to better assist transit agencies with the processes surrounding eligibility, evaluation, and certification of paratransit riders.

OVERVIEW OF ADA PARATRANSIT ELIGIBILITY

While transit agencies were first required under the ADA regulations in 1991 to provide complementary paratransit service for those fixed-route services falling under the requirements as established by the Act, prior to that time many agencies already offered paratransit services based on local needs as identified by individual transit boards. However, with the passage of ADA in 1991, eligibility for complementary paratransit service was specifically spelled out. Complementary paratransit service must be provided by the operator when a trip meets the service requirements, as discussed in the previous section. However, all transit agencies were required to establish a process for certifying individuals as paratransit eligible. Under the Act, three categories of eligibility were defined. These three categories are restated and defined in the following sections.

CATEGORIES OF ELIGIBILITY

As noted above, Category 1 includes those persons unable to use fully-accessible fixed-route services: *Any individual with a disability who is unable, as the result of a physical or mental impairment (including a vision impairment), and without the assistance of another individual (except the operator of a wheelchair lift or other boarding assistance device), to board, ride, or disembark from any vehicle on the system which is readily accessible to and usable by individuals with disabilities.*

A key component to being eligible under **Category 1** is the inability to navigate the system. As noted in the *Determining ADA Eligibility* report produced by Project ACTION, navigating the system might involve obtaining and understanding system information, recognizing and boarding the correct vehicle, recognizing destinations, and understanding transfers needing to be made.

However, several issues should be considered by transit agencies that might assist individuals who would be otherwise eligible under **Category 1**. Often, providing travel training for persons needing additional assistance could allow them to use the fixed-route system for trips made frequently, such as school or work trips. Also, by providing operator or employer assistance to a patron, an individual may be able to make the trip on the fixed-route. Finally, the ADA regulations require that the fixed-route system be accessible for certain standard-size mobility aids. An individual would not be deemed eligible under Category 1 if their mobility aid is too

large (wheelchair) or too heavy for the lift (standard 600 pounds limit includes chair and patron).

Category 2 includes *any individual with a disability who needs the assistance of a wheelchair lift or other boarding assistance device and is able, with such assistance, to board, ride, and disembark from any vehicle which is readily accessible to and usable by individuals with disabilities if the individual wants to travel on a route of the system during the hours of operation of the system at a time, or within a reasonable period of such time, when such a vehicle is not being used to provide designated public transportation on the route.*

Eligibility under **Category 2** would occur based on the accessibility of transit vehicles and stations/stops. This category addresses patrons who use wheelchairs as well as other mobility aids such as walkers, canes, and leg braces. Since the implementation of ADA regulations, eligibility under this category has decreased, as many transit agencies have fleet vehicles that are 100 percent accessible for providing transit service.

Finally, **Category 3** eligibility includes *any individual with a disability who has a specific impairment-related condition which prevents such individual from traveling to a boarding location or from a disembarking location on such system.*

Certain environmental and architectural factors can inhibit an individual with a disability from fully using the transit system. Examples of this would include:

- Lack of sidewalks and/or curb cuts for wheelchair-bound patrons leading to and from a transit stop
- Steep terrain
- Snow/ice
- Temperature extremes
- Temporary construction projects

These environmental attributes, when combined with a patron's disability, may prevent use of the fixed-route system. In that instance, a patron would be deemed eligible for complementary paratransit service under **Category 3**. Again, a case-by-case review may be necessary for instances when weather extremes and conditions (snow/ice) combined with an individuals' disability would render that trip eligible for paratransit service.

OTHER ELIGIBILITY ISSUES

In addition to the three categories of eligibility, a transit agency also must consider additional patrons that may use the complementary paratransit system under ADA regulations. These patrons include travel companions/personal care attendants for those patrons eligible in the three categories, visitors to the area where the fixed-route operates, and individuals that may have temporary disabilities that qualify them for complementary paratransit service.

Under ADA, transit providers must provide service to an attendant traveling with an eligible rider. In addition to any attendant, service must also be provided to one companion accompanying an eligible rider. Also, attendants must be provided a free trip; companions can be charged the same fare as the eligible rider.

Visitors to an area who cannot use the fixed-route system also must be provided service. Certification of any individual as ADA paratransit eligible in their home jurisdiction must be honored by the transit agency. If no certification exists where they live, a patron is entitled to presumptive eligibility and must be provided with 21 days of service.

Also, temporary disabilities will qualify an individual to be ADA paratransit eligible for the term of that disability. Transit agencies have the right to determine an expiration date on any certifying documentation of an individual who is unable to use the fixed-route system for a specified period of time coinciding with a temporary disability or condition.

DIFFERENCES OVER THE YEARS

As noted previously, many transit providers offered paratransit services well before the federal regulations as outlined in the ADA. Key differences should be noted and addressed by the agencies when establishing formal procedures for the paratransit eligibility process so as not to confuse the actual requirements of the ADA versus what policies and procedures may be desired at a more localized level. Such differences would include the following:

- ADA paratransit eligibility as a civil right
- Strict determinations of ADA paratransit eligibility
- Functionally-based determinations of eligibility
- Conditional or trip-by-trip eligibility
- Determining eligibility based on the most limiting factors

ADA Paratransit Eligibility as a Civil Right - According to the federal regulations, failure to conduct a determination process that meets federal regulations is a violation of the civil rights

of the affected individual. In the case of an individual who abuses the no-show policy adopted by the agency, once an individual has been determined eligible, the individual's eligibility is similar to a property right. Consequently, before eligibility may be removed, due process must be provided to the individual. In this case, it would be imperative for the agency to formally adopt procedures outlining the procedures and policies as related to a patron's responsibility for using the transit system.

Strict Determinations of ADA Paratransit Eligibility - Under ADA regulations, it is imperative that the transit agency not certify other individuals who do not meet one of the three eligibility categories as ADA paratransit eligible. If a transit agency wishes to provide paratransit service to additional populations (e.g., seniors), documentation certifying them as eligible under ADA regulations should not be issued.

Functionally-Based Determinations of Eligibility - In times previous to ADA regulations, agencies may have deemed patrons eligible if a disability such as blindness or inability to walk existed. However, a disability alone is not acceptable to determine eligibility under ADA.

Conditional or Trip-by-Trip Eligibility - Under ADA, complementary paratransit service is required only on trips that cannot be made on the fixed-route. While patrons can be considered eligible for service, determinations need to be made as to whether patrons are conditionally or unconditionally eligible and must include limitations of eligibility in the documentation provided.

Determining Eligibility Based on the Most Limiting Factors - Determinations of eligibility must consider the ability of patrons to travel to any origin and destination in the paratransit service area under all possible conditions. While some trips may require paratransit service, often a patron can maneuver on the fixed route for some trips. In this instance, a patron should receive a conditional eligibility and would be eligible only for those ADA paratransit trips that cannot be accommodated with the fixed-route system.

TRENDS AND CHANGES IN THE PARATRANSIT ELIGIBILITY PROCESS

As noted previously, many transit providers offered paratransit services well before the federal ADA regulations. Key differences should be noted and addressed by the agencies when establishing formal procedures for the paratransit eligibility process to avoid confusing the actual requirements of the ADA versus local policies and procedures may be desired at a more localized level.

Since the inception of ADA regulations, many transit agencies have worked to meet or exceed the requirements, but in doing so have seen large increases in the numbers of individuals being certified ADA eligible and in the provision of paratransit trips. TCRP Synthesis Report 30, which discusses and summarizes ADA paratransit eligibility certification processes, notes that many agencies have dealt with implementing a paratransit system that fully adheres to the regulations outlined in the ADA. While the report identifies substantial increases in the number of fully-accessible bus fleets throughout the nation and record numbers of wheelchair boardings on fixed-route buses, it also notes that ADA paratransit ridership increased from 20 to 45 million annual trips in the five years following the signing of the ADA legislation. The report also notes that since agencies report that the cost of providing a paratransit trip exceeds the cost of a fixed-route trip often by 10 times, agencies are finding it impossible not to consider taking a more financially-prudent look at providing paratransit trips. To address this concern, transit agencies are looking more closely at ways to reduce or better manage paratransit costs. Implementing more stringent ADA eligibility certification processes is one way agencies are working to reduce the cost. In addition to tightening the eligibility procedures during the application process, more agencies are looking at trip-by-trip screening as a possible solution. The following section outlines some of the methods the TCRP report found agencies to be using to cut overall costs of delivering paratransit service.

TYPES OF ADA PARATRANSIT ELIGIBILITY PRACTICES

While TCRP Synthesis 30 found that there are many different approaches to determining ADA paratransit eligibility, it found that most eligibility processes included one, some, or all of the following elements:

- Self-certification by the applicant
- Professional verification via written documentation and/or telephone conversation
- In-person interview
- In-person functional assessment
- In-person cognitive assessment
- In-person assessment of visual ability

TCRP Synthesis 30 highlighted four case studies that described the actual processes used at the transit agencies. There was no single methodology that produced the most effective eligibility certification method. Some measures that could provide an indication of a program's effectiveness include the proportion of applicants who are denied eligibility or found conditionally eligible, the number of appeals, and the number of appeals upheld. However, there are no standards for what the percentages should be in each of the categories.

Therefore, it is up to individual transit agencies to consider what is most important when designing an eligibility process for paratransit service. Simply asking applicants to self-certify without follow-up or review may cost the agency ADA paratransit trips that may have otherwise been denied. However, if every applicant were to have an in-person assessment, trip eligibility would certainly decrease, but the overall cost of implementing such a screening process might be cost prohibitive.

In Project ACTION's report entitled *Determining ADA Paratransit Eligibility: An Approach, Guidance and Training Materials*, assessment materials are presented and shown how to be used as part of the overall eligibility process. However, it is up to individual transit agencies to institute the type of process that they deem best for their situation, as there is no one widely accepted or recommended model. While hiring outside agencies to conduct assessments and report back to the transit agencies can be a costly operation, the Project ACTION report contains numerous CDs and instructions on how to set up and conduct such processes in-house, should a transit agency want to conduct its own screening process.

EMERGING AGENCY PRACTICES

In addition to the ADA paratransit eligibility certification practices detailed in TCRP Synthesis 30 and described in the previous section, other emerging practices to address controlling the costs of complementary ADA paratransit costs are briefly described.

Trip By Trip Eligibility Determination - Transit agencies attempt to determine and identify the specific barriers that prevent riders from using fixed-route service. If such barriers do not impact *all* passenger trips, the rider can be classified as conditionally eligible. This means that the rider is sometimes able to use fixed-route service as conditionally eligible and given a code identifying the types of barriers that prevent fixed- route use.

Transit systems evaluate trips made by conditionally-eligible riders by determining distances to/from stops, evaluating the path of travel to/from stops, and similar factors. Specific trips are determined either to be paratransit eligible or not, and the exact origin and destination are recorded in the system. A trip eligibility file is created. When a trip is booked, a code is entered. By recording how many trips are provided for conditionally-eligible riders and what barriers prevented fix-route use, the system can identify and correct barriers that are creating significant paratransit demand.

When conditionally-eligible riders call to book trips, the reservationist opens the trip eligibility file is opened to see if the trip requested has already been evaluated. Depending on whether the trip is listed as eligible or ineligible, the reservationist approves or denies the trip.

Fixed-Route Travel Training - The ADA paratransit eligibility process also can be used to identify the potential of individuals to use fixed-route service with some instruction or travel training. Transit agencies often contract with professionals and agencies in the community to make travel training available. Some agencies hire travel trainers and developing travel-training services in-house. Systems with a comprehensive travel training program can offer many different types and levels of instruction. Customer service staff can travel with individuals and provide instructions on trip planning, routes, and schedule information.

Charge Supplemental Fare for Service Beyond 3/4 Mile Corridor or Fixed-routes - This strategy addresses the travel needs of riders who would otherwise be eligible for ADA paratransit service but have an origin or destination outside the minimum $\frac{3}{4}$ mile service corridor. Some agencies provide service outside the minimum required service areas but charge a higher or premium fare for this service.

Offer Free or Reduced Fare Fixed-Route Service to Persons Determined to be ADA Paratransit Eligible and to Companions and PCAs of Persons - Many transit agencies offer financial incentives to ADA paratransit eligible individuals to use fixed-route transit services for those trips that the individual might be able to undertake. These incentives are also sometimes extended to persons accompanying the ADA paratransit eligible rider.

Same-Day Taxi Subsidy Program - A few agencies have instituted a same-day taxi subsidy program to supplement the normal next-day ADA paratransit service, providing ADA riders with a more spontaneous option for travel and providing cost savings to the extent ADA riders chose the same-day program over the normal next-day service. This alternative service is offered with a lower per-ride passenger subsidy and costs the passenger more for his/her share. This practice provides a higher quality and spontaneous transit option, diverts trips from the normal ADA paratransit service, and results in a savings to the transit agency.

CHAPTER THREE

OVERVIEW OF EXISTING PRACTICES FOR ADA PARATRANSIT ELIGIBILITY

An element of the research was to identify how transit agencies reacted to and adapted their ADA paratransit eligibility process as costs of service increased and demand for services grew. A survey instrument was distributed to a sample of fixed-route transit systems across the U.S. that operate complementary ADA paratransit services. This chapter provides a review and summary of the relevant findings.

SURVEY PROCESS

A **survey instrument** containing 19 questions was developed around the following seven eligibility certification procedures and practices categories:

- Most current fiscal year data
- Agency ADA trip demand
- Certification process
- Conditional (trip-by-trip) eligibility
- Travel training and use of fixed-route system
- Other changes
- Other suggestions or ideas

SURVEY RESPONDENTS

In February 2008, surveys were distributed to a sample of 110 fixed-route systems that are required to provide ADA complementary paratransit service. As detailed in Table 1, responses were received from 39 transit systems, representing a 35 percent response rate. A copy of the survey instrument is included as Appendix A.

Table 1. Fixed-Route Transit Systems Responding to Survey

Access Services Incorporated – Los Angeles, California	Milwaukee County Transit System – Milwaukee, Wisconsin
ACCESS Transportation Systems (Port Authority of Allegheny County) Pittsburgh, Pennsylvania	North County Transit District – Oceanside, California
Bloomington Public Transportation Corporation - – Bloomington, Indiana	Norwalk Transit District – Norwalk, Connecticut
Broward County Office of Transportation – Pompano Beach, Florida	Park City Transit – Park City, Utah
Capital Area Transportation Authority – Lansing, Michigan	Pasco County Public Transportation – Port Richey, Florida
Capital Metropolitan Transportation Authority – Austin, Texas	Regional Transit System (RTS) –Gainesville, Florida
Central Arkansas Transit Authority – Little Rock, Arkansas	Regional Transportation Commission of Southern Nevada –Las Vegas, Nevada
Chittenden County Transportation Authority – Burlington, Vermont	Sac State Shuttle – Sacramento, California
City of Everett/Everett Transit – Everett, Washington	San Francisco Paratransit/Veolia Transportation – San Francisco, California
Community Transit –Everett, Washington	San Mateo County Transit District – San Carlos, California
Dallas Area Rapid Transit (DART) - Dallas, Texas	Sarasota County Area Transit – Sarasota, Florida
East Bay Paratransit (AC Transit and BART) – Oakland ,California	Southeastern Pennsylvania Transportation Authority (SEPTA) – Philadelphia, Pennsylvania
Erie Metropolitan Transit Authority – Erie, Pennsylvania	Special Transportation System (STS), Charlotte Area Transit System (CATS) – Charlotte, North Carolina
Fort Worth Transportation Authority (THE T) – Fort Worth, Texas	Suburban Mobility Authority For Regional Transportation – Detroit, Michigan
Hampton Roads Transit –Hampton Roads, Virginia	TARTA (Toledo Area Regional Transit Authority) – Toledo, Ohio
Island Transit – Coupeville, Washington	The Rapid - Grand Rapids, Michigan
Madison Metro Transit – Madison, Wisconsin	Utah Transit Authority - Salt Lake, Utah
Manatee County Area Transit – Bradenton, Florida	Valley Metro Regional Public Transportation Authority – Phoenix, Arizona
MARTA – Atlanta, Georgia	Winston Salem Transit Authority – Winston Salem, North Carolina
Metropolitan Transit Authority of Harris County – Houston, Texas	

SURVEY FINDINGS

The following sections provide a summary of the significant responses organized around the survey’s seven eligibility certification procedures and practices categories. Since the inception of ADA regulations, transit agencies have worked to meet the letter of the law, but in doing so have seen large increases in the numbers of individuals being certified ADA eligible and the number of paratransit trips provided by the transit agency. As shown in Figure 1, 70 percent of the responding transit agencies indicated that the demand for ADA paratransit trips increased between 2003 and 2008, while 30 percent indicated no increase.

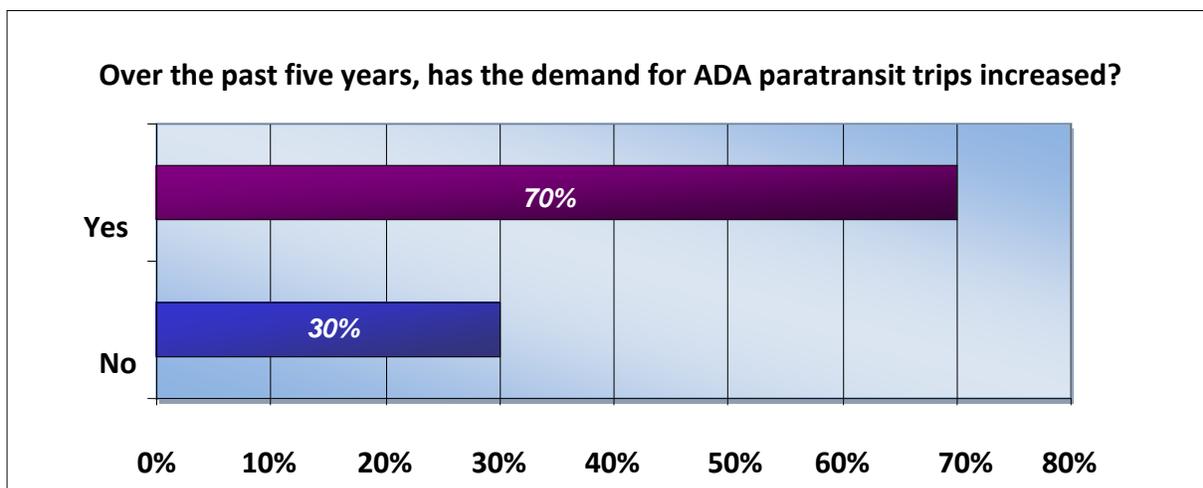


Figure 1. Increase in ADA Paratransit Trips, 2003 - 2008

Due to the growing demand for ADA-related paratransit trips and limited operating budgets, transit agencies have implemented a number of actions aimed at reducing the costs of these services, including steps to limit the demand through stricter and more complex ADA paratransit eligibility processes.

Table 2. Increases in ADA Demand for Paratransit, 2003 - 2008

<i>Agency</i>	<i>% Increase</i>
Dallas Area Rapid Transit (DART)	3%
Memphis Area Transit Authority	3%
Broward County Office of Transportation	5%
Memphis Area Transit Authority	5%
Southeastern Pennsylvania Transportation Authority (SEPTA)	6%
Regional Transit System (RTS)	10%
The Rapid	10%
Madison Metro Transit	12%
King County Metro Transit	14%
Suburban Mobility Authority For Regional Transportation	15%
San Mateo County Transit District	15%
Metro Mobility	16%
Capital Area Transportation Authority	18%
North County Transit District	18%
Community Transit	21%
Sarasota County Area Transit	25%
La Crosse MTU	27%
Capital Metropolitan Transportation Authority	28%
Jacksonville Transportation Authority	28%
Golden Gate Bridge, Highway and Transportation District	29%
Island Transit	30%
Winston Salem Transit Authority	30%
Special Transportation System (STS), Charlotte Area Transit System (CATS)	38%
Manatee County Area Transit	50%
Valley Metro Regional Public Transportation Authority	100%

CERTIFICATION PROCESS

The determination of who is eligible for ADA complementary and other paratransit services is a critical step in the management of the costs of providing paratransit services. While transit agencies must adhere to both ADA and U.S. Department of Transportation regulations, without a well-defined eligibility determination process, an agency may inadvertently provide

complementary ADA paratransit trips to individuals who do not need paratransit services or in excess of minimum regulatory requirements.

Figures 2 through 7 describe the responses to the survey questions focusing on specific types of assessment practices used by transit agencies in the certification process.

SELF-CERTIFICATION

Eligibility is determined based on information provided on an application form and verification by a professional on an as-needed basis. In some cases, applicants may be contacted by the transit agency by phone, e-mail, or in writing to request more information or for clarification of their condition or travel skills. When this does not result in enough information to make a determination, some type of follow-up (second level) assessment may be necessary.

As shown in Figure 2, 59 percent of transit agencies responding to the survey indicated that they “Never” use self-certification as part of the certification process; 27 percent of the transit agencies indicated they “Always” use self-certification, and 14 percent indicated that they “Sometimes” use self-certification.

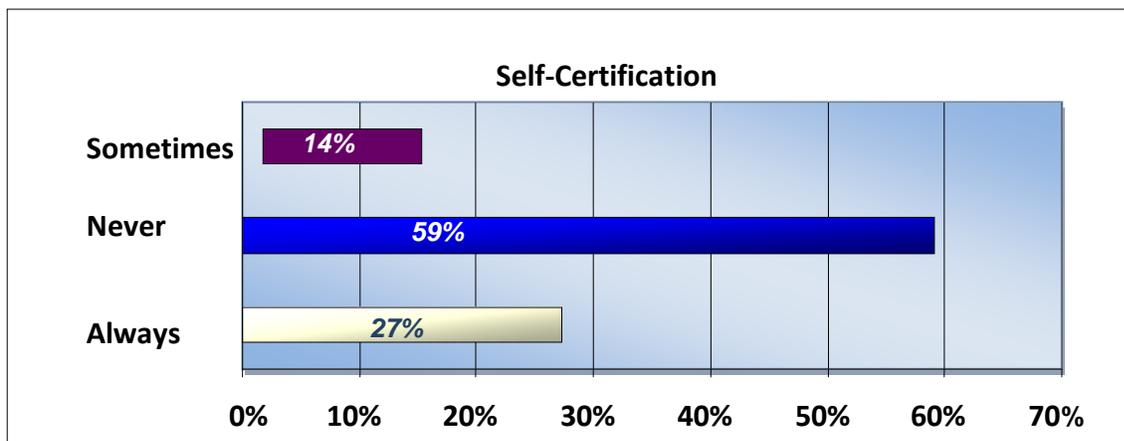


Figure 2. Self-Certification

PROFESSIONAL VERIFICATION VIA WRITTEN DOCUMENTATION AND/OR TELEPHONE INTERVIEW

In some cases, eligibility is determined by means of the application form and an interview of those applicants for whom there are questions or doubts about to their abilities to use fixed-route transit. Most application forms require a medical professional to independently verify and document the physical conditions and mobility needs of the applicant. In addition to the

review of medical documentation, professional verification interviews may be conducted by telephone or in person, depending on the situation. Interviews normally follow a prescribed process, making it a more formal review than merely following up on missing or questionable items as in Self-Certification.

As shown in Figure 3, 54 percent of transit agencies indicated that they “Always” use some professional verification via written documentation or phone interview. Nearly 40 percent indicated that they “Sometimes” use professional certification, and only 6 percent indicated that they “Never” use the professional verification via written documentation or phone interview.

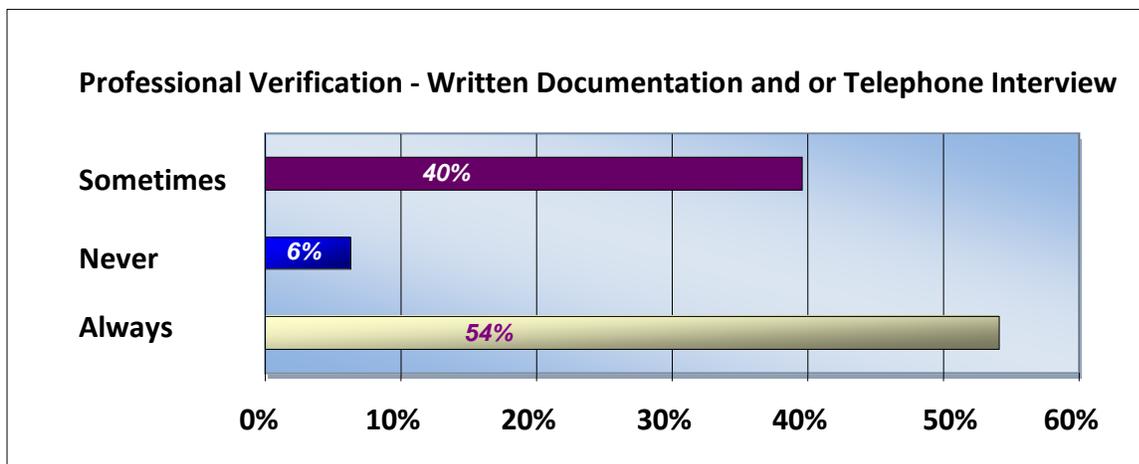


Figure 3. Professional Verification

IN-PERSON INTERVIEW

Eligibility in some agencies is based on an in-person interview for each applicant. Application forms that are filled out in advance may or may not be part of the process.

Figure 4 shows that 44 percent of transit agencies responding to the survey indicated that they “Sometimes” use in-person interviews; 33 percent indicated that they “Always” use in-person interviews, and 22 percent indicated that they “Never” use in-person interviews.

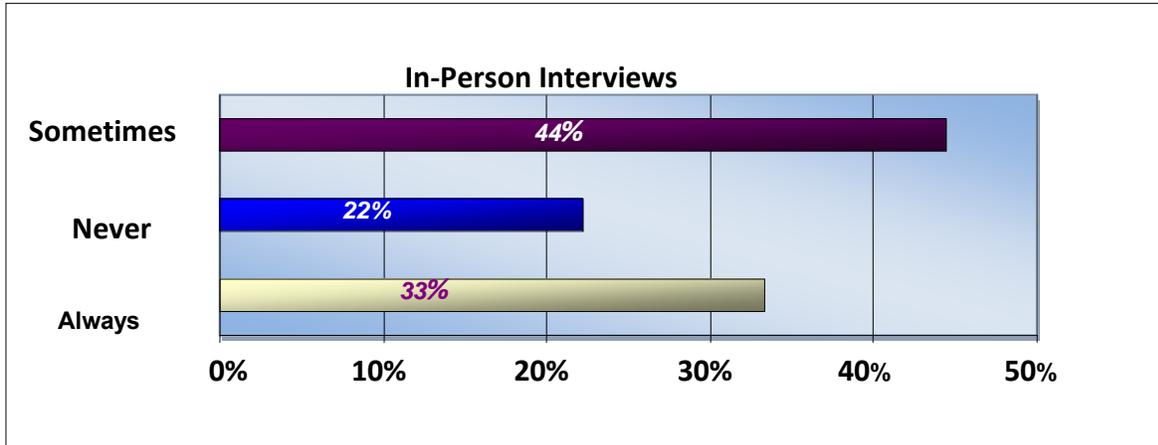


Figure 4. In-Person Interviews

IN-PERSON FUNCTIONAL ASSESSMENTS

Eligibility is based on in-person functional assessments for all applicants, which consist of specific observation or testing of a person’s abilities, skills, or limitations. It is a local policy decision to determine what level of functional assessments can be economically justified to identify those applicants who are able to use fixed-route transit service.

Figure 5 shows that 19 percent of the responding transit systems “Always” conduct an in-person functional assessment of their applicants; 54 percent “Sometimes” conduct an in-person functional assessment, and 26 percent “Never” conduct an in-person functional assessment. This may be due to the fact that the applicants are most likely eligible based upon their applications and physician assessments. Common categories of exception include the legally blind, nursing home residents, and seniors (age 80+).

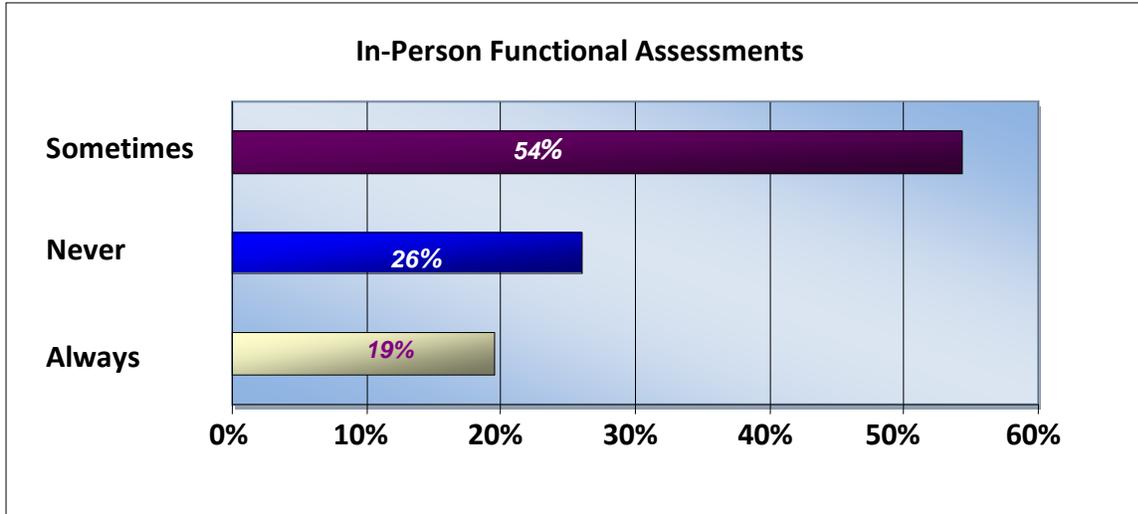


Figure 5. In-Person Functional Assessments

IN-PERSON COGNITIVE ASSESSMENT

Eligibility is based on a review of the application form and perhaps an in-person interview, along with information provided by an appropriate professional familiar with the applicant. If the information provided by the applicant and professional is not sufficient to make a thorough determination, the transit system may choose to ask the applicant to participate in a cognitive assessment. The recommended tool for such an assessment is the Functional Assessment of Cognitive Transit Skills (FACTS). FACTS is the only assessment tool developed and validated to specifically predict the abilities of persons with cognitive disabilities to use fixed-route transit.

Figure 6 shows that 41 percent of the responding transit systems' "Sometimes" conduct a cognitive assessment of their applicants and 41 percent "Never" conduct a cognitive assessment, while 18 percent "Always" conduct an in-person functional assessment.

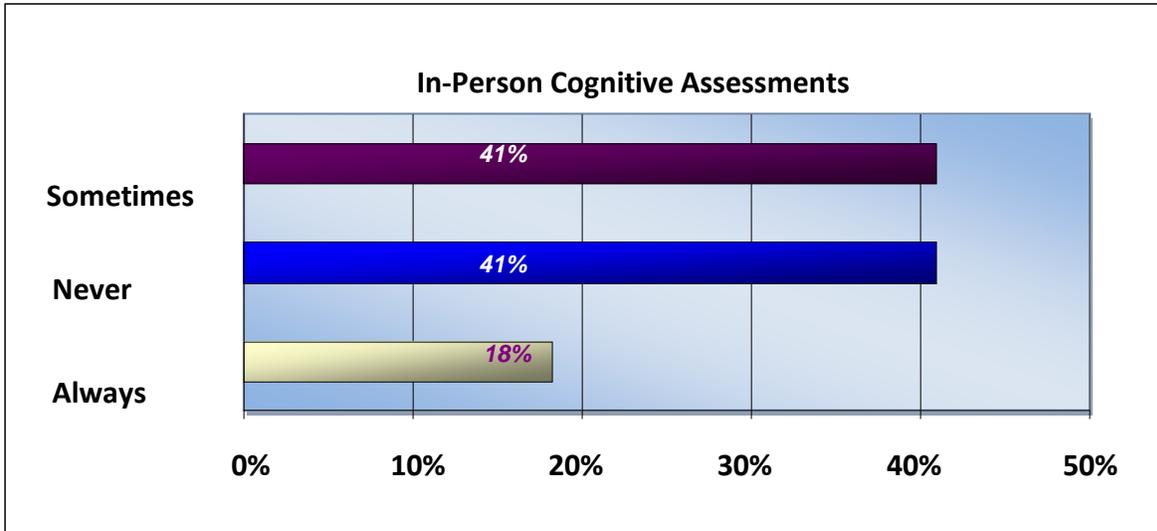


Figure 6. In-Person Cognitive Assessments

IN-PERSON ASSESSMENT OF VISUAL ABILITY

It is recommended that the assessment for visual ability be conducted by an Orientation and Mobility (O&M) Specialist. If an O&M Specialist is not available, an alternative process relies on input from the applicant and professionals familiar with the functional abilities of the applicant.

Figure 7 shows that 43 percent of the responding transit systems “Never” conduct a visual ability assessment of their applicants; 35 percent “Sometimes” conduct a visual assessment and 22 percent “Always” conduct a visual assessment. The high percentage of agencies that never do a visual ability assessment may be due to the fact that there are currently no known assessment tools that have been validated to accurately predict fixed-route travel abilities of person with visual disabilities.

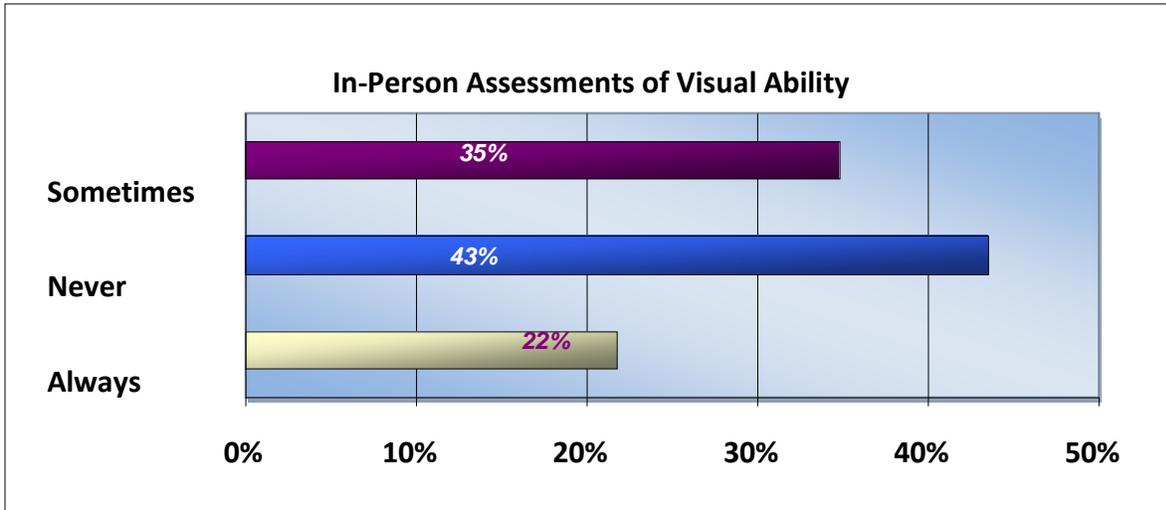


Figure 7. In-Person Assessments of Visual Ability

CHANGES MADE TO ADA ELIGIBILITY CERTIFICATION PROCESS

Figure 8 shows that 51 percent of transit agencies responding to the survey indicated that they made no changes to their certification process in the last five years, while 48 percent indicated that they made to changes to the eligibility process.

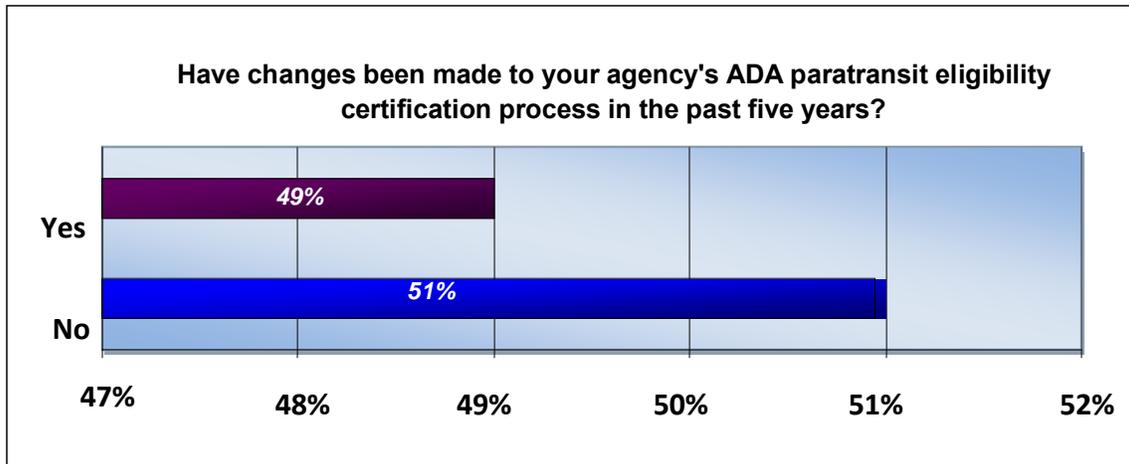


Figure 8. Changes Made to ADA Paratransit Eligibility Certification Process in Last Five Years?

Following is a list from agencies that explains why they have made changes to their ADA Paratransit Certification Process.

REASONS FOR CHANGES

- It did not make sense to send a full application packet to someone who is unconditional eligible and when there is no chance that his/her functional abilities will change.
- Implemented the in-person process in order to identify the best mode of transportation for each individual. As fixed-route becomes more accessible, clients are more apt to be able use fixed-route; with this in mind the cost of ADA will be reduced.
- Budget restrictions.
- Previously used self-certification for paratransit services, which we needed to stop in order to ensure that we better meet the needs of riders who are eligible under the federal guidelines.
- Update form, offer travel training, change recertification to every 5 years.
- Greater commitment of staff resources to the screening process to insure its thoroughness.
- To better meet FTA guidance, provide more accurate certifications, and reduce the number of unconditional certifications.
- Previously, everyone was eligible if they had a disability.
- Found that the self-certifying process resulted in many ADA paratransit riders that could utilize local fixed-route.
- More accuracy.

TYPES OF CHANGES

- Created a short ADA recertification form, which can be done over the phone, for customers with cognitive disabilities whose FACTS test scores indicate there is no chance that they will ever use a fixed-route bus and for individuals who are totally blind and whose documentation demonstrates no ability to learn to travel independently on fixed-route.
- Instituted in-person functional assessment, provide travel training, redesigned a more detailed ADA application, and request for professional verification form.

- Revised applications, in-person interviews, and functional assessment.
- The application requires professional verification now. Do not accept copies of the application. It can be completed and submitted on-line. Also, do in-person assessments on most new applicants.
- Rather than an on-property assessment, we do a community assessment. We have added an Orientation & Mobility Specialist for persons with visual disabilities.
- As part of a written application, all potential riders must include a professional verification form that includes a release of information and contact info of the professional completing the form. If there is still some question of an applicant's eligibility, he/she will meet with Metro Mobility staff for an interview and perhaps a physical or cognitive assessment using the Tinetti gait and balance test, FACTS, and traveling out into the community as needed.
- More stringent guidelines for in-person evaluations; more people are sent for in-person evaluations. Allowed people who will be always fully eligible due to severe disabilities to use a streamlined recertification process if nothing has changed in past three years.
- Assessment test on passengers that are questionable. In the past, if there was doubt, the applicant was approved if the doctor said yes. Now require all passengers to be re-certified. Their condition determines if they're recertified for 1 year or 3 years.

APPLICATION FORM CHANGES DUE TO CHANGES IN THE ELIGIBILITY CERTIFICATION PROCESS

Figure 9 shows that 56 percent of transit agencies responding to the survey indicated that their application for ADA Eligibility did not change due to changes made in their certification process, while 44 percent of the transit agencies responding made changes to their application.

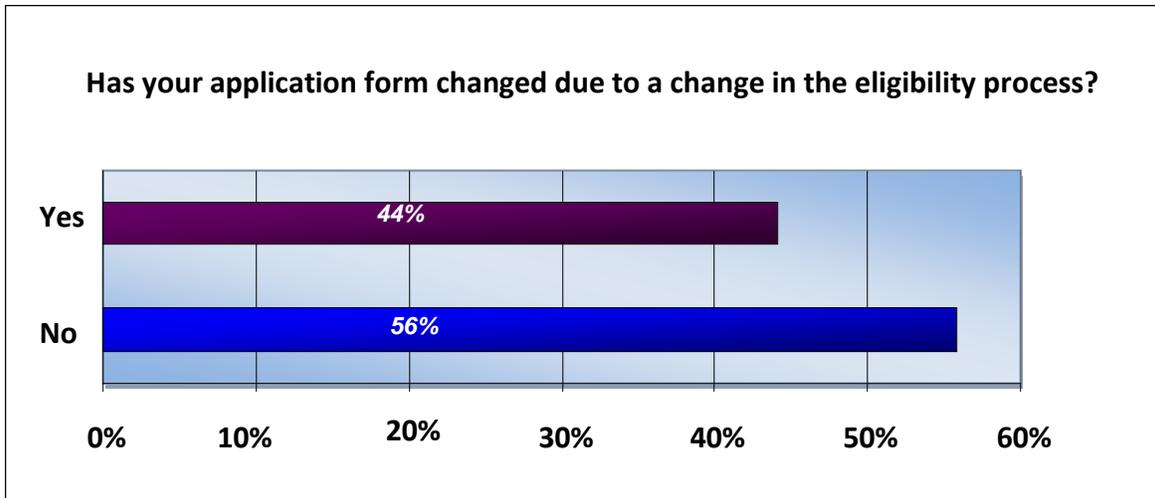


Figure 9. Application Form Changed Due to Change in Eligibility Process?

APPLICATION CHANGES

- The old application required applicants to complete each section, regardless of whether or not they believed the questions applied to them. The new application is designed so applicants will complete the general information section and only those sections that apply to them. The sections are broken down into the following categories: physical disabilities, cognitive disabilities, psychological disabilities, and sensory (visual/hearing) disabilities.
- More fixed-route information, new intro page, passenger weight, questions about independent living skills.
- Added wheelchair weight to form. Additional information regarding mobility as well as requiring the physician to write down the person's combined weight if using a mobility device that must be secured in the vehicle.
- In addition to the professional verification portion, our application now asks for more details than it used to regarding fixed-route travel. Rather than just asking if an applicant uses fixed-route, it now asks about frequency and number of destinations reached.
- Most changes were to better phrase questions to get more accurate information. Added more language to determine wheelchairs used, access to their homes, and specific conditions under which they're not able to use fixed-route. Updating the application is an ongoing process.

- Requested date of birth, male or female for database purposes. Added to list of mobility devices walker, large wheelchair, large scooter, and cane. Added health information, privacy act statement for release of information (requested by doctors.) Added professionals who could complete request for professional verification to include physical therapist, occupational therapist, nurse practitioner, rehab specialist, orientation and mobility specialist, etc. The application asks for visual acuity if legally blind to get a better handle on whether to give conditional or unconditional certification. Added a year to the application so only current applications would be accepted.
- Professional verification page now includes specific questions relating to function to be answered by physician.
- Revised application so that we could better determine person's functional abilities; also, made application easier to understand for applicants.
- Most changes are to better phrase questions to get more accurate information. Added language to determine wheelchairs used, access to their homes, and specific conditions under which they're not able to use fixed route. Updating the application is an ongoing process.

CHANGE IN THE NUMBER OF APPLICATIONS RECEIVED

Figure 10 indicates that 50 percent of transit agencies responding to the survey indicated that the number of approved applications received stayed the same after changes were made to certification process, while 21 percent saw some increase in the number application received. Only 12 percent saw a significant increase, while 15 percent saw some decrease in the number of applications received. Only three percent of the agencies saw a significant decrease in applications.

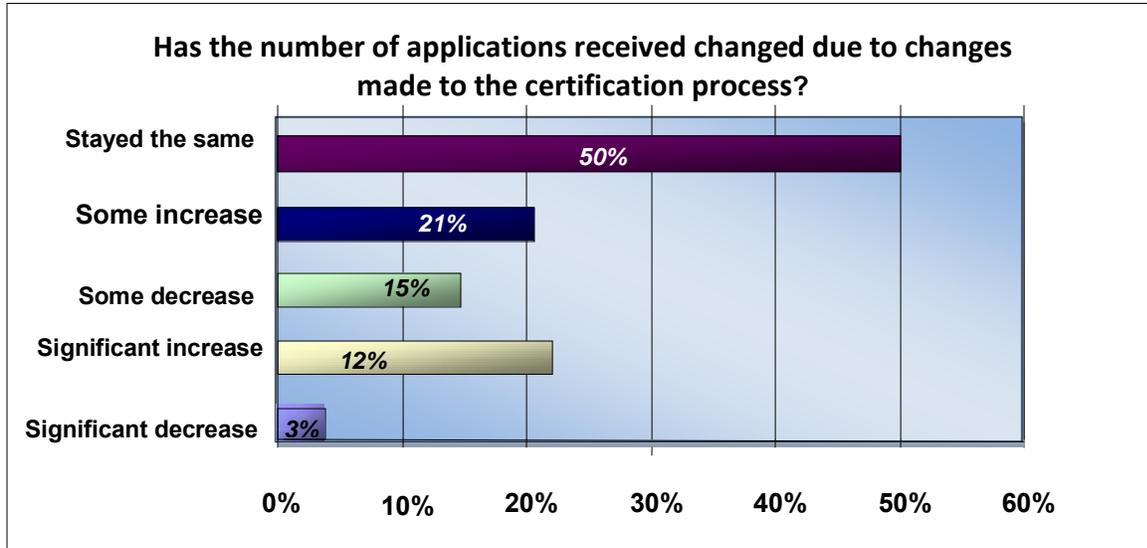


Figure 10. Number of Applications Received Changed Due to Change in Certification Process?

CHANGE IN THE PERCENTAGE OF APPLICATIONS APPROVED AFTER CHANGES TO THE CERTIFICATION PROCESS

Figure 11 shows that 44 percent of transit agencies responding to the survey indicated that the percentage of applications approved stayed the same after changes were made to the certification process. Only 21 percent of agencies reported some decrease in the number of applications approved after changes were made to the certification process, and 15 percent of the agencies reported a significant increase, while 12 percent indicated some decrease in the number applicants after changes were made to certification process. Only 3 percent of the agencies saw a significant decrease in applications approved.

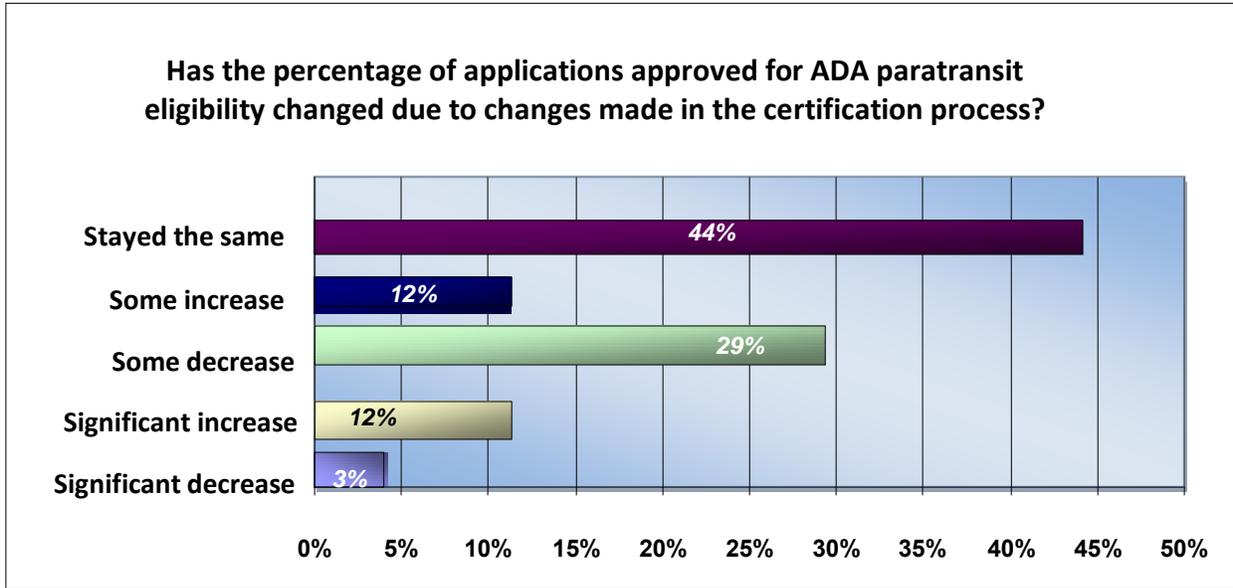


Figure 11. Percentage of Applications Approved Changed Due to Change in Certification Process?

RECERTIFICATION

To keep an up-to-date and accurate register of eligible passengers, an essential step is to conduct recertification of existing passengers. This process also allows the agency to update and fine-tune its application process. The recertification process permits the agency to eliminate from their eligibility rosters passengers who are deceased or those who have relocated to another community. Figure 12 indicates that 74 percent of the responding agencies recertify their passengers every three years.

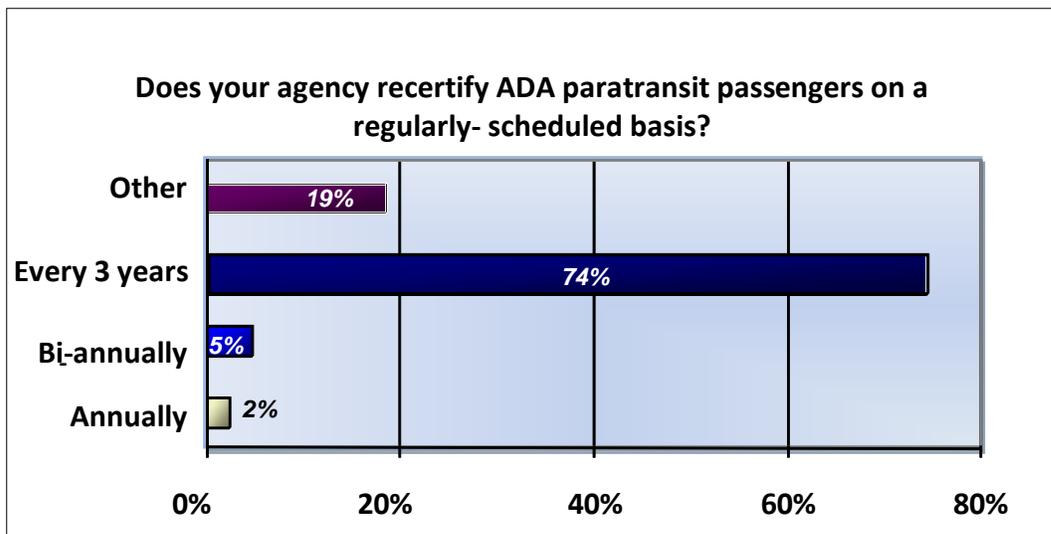


Figure 12. Recertify ADA Paratransit Passengers?

Below is the certification schedule of the agencies that responded to “Other.”

OTHER CERTIFICATION SCHEDULES

- 2-3 years, depending on individual conditions
- Full and Conditional, every 2 years; Temporary, 2-12 months, depending on circumstances
- Every 4 years maximum, some shorter
- Monthly
- 5 years
- The standard is every three years. Some people get a year or less, depending on their disability and whether we expect changes within a year. Also, if people have a change between ambulatory and using a wheelchair, or change between a power wheelchair / scooter and manual chair
- Full and Conditional, every 2 years; Temporary, 2-12 months, depending on circumstances
- Every 4 years, matching the expiration of state ID's or drivers' licenses

PHYSICAL ASSESSMENT

The Physical Assessment is performed to assess abilities needed to use fixed-route service. This includes elements for assessing the ability to negotiate flights of stairs and elevators, use low-floor buses, pay a fare, and stand on a moving vehicle. Figure 13 indicates that 51 percent of those responding reported that they did not perform physical assessments, while 49 percent of the agencies perform physical assessments.

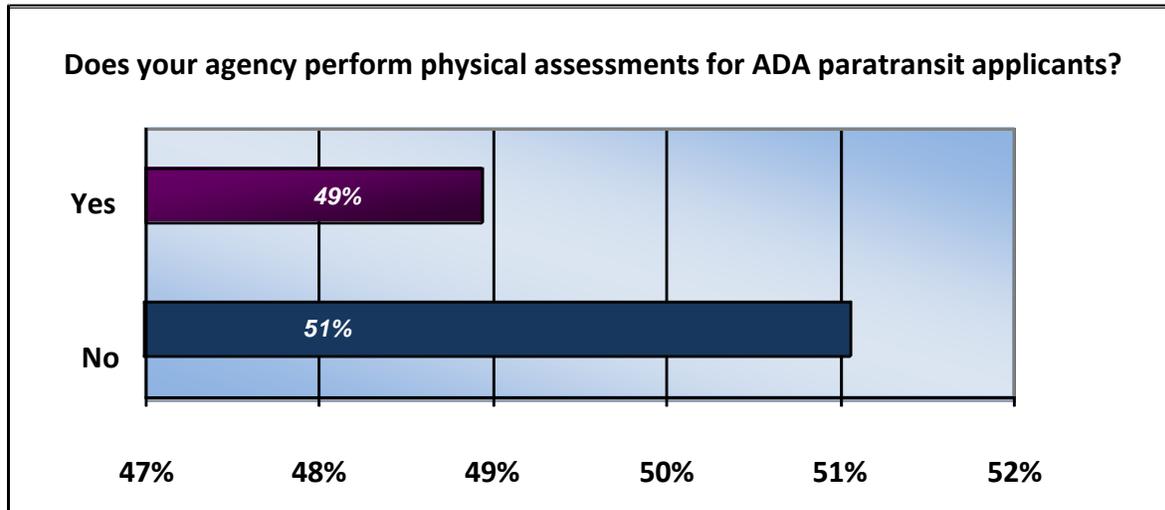


Figure 13. Perform Physical Assessment for ADA Paratransit Applicants?

Agencies that responded “Yes” were then asked, “What percent of applicants must undergo the assessments?” A total of 22 agencies responded to this question, with 5 agencies indicating that they perform 100 percent physical assessments on their applicants; 8 agencies responded that physical assessments are performed on 50-82 percent of their applicants, and the remaining agencies perform physical assessments on 1-35 percent of their applicants.

ADDITIONAL INFORMATION ON PHYSICAL ASSESSMENTS

- Applicants selected for physical assessment were chosen by contracted medical doctor based on information provided in the ADA application.
- Individuals are tested when they indicate, or it is observed, that their disability affects their functional ability to ambulate.
- Approximately 2/3 of applicants must have an in-person interview, which usually includes some form of physical assessment.
- Needs to be performed by professionals in the rehab or medical field. On a minimum basis, during appeals, we observe the customer climbing stairs, opening doors, their verbal comprehension, along with diagnostic and prognostic advice from the medical professionals.

- Mobility Coordinator actually walks outside with applicant and observes person boarding bus, reading headway signs, etc.
- Sixty percent of the applicants are seen in person. If they are in their 80s or 90s, we do not require an assessment. Others come in to our transit center and, depending on the disability, are asked to do various things that would be necessary to take the bus. An Occupational Therapist and our own Travel Trainer perform most assessments. The O&M instructor comes in for applicants with visual impairments.
- Observe customers while they are in the office. As appropriate, customers are asked to stand and transfer to a chair. Their overall physical abilities are evaluated.
- PT/OT staff from Easter Seals of Western Pennsylvania performs physical functional assessments using the Project ACTION model.
- There are four separate contract agencies that perform physical, cognitive, or visual assessments/readings. If unable to obtain information from the professional(s) listed by the applicant within two weeks of our request, or the information received is conflicting, the applicant is required to go on a functional assessment. Transportation is offered free of charge.
- Mobility Coordinator walks outside with applicant and observes the applicant boarding bus, reading headway signs, etc.
- If medical information is vague or inconsistent with the application, then we may use Easter Seals for a Third Party Assessment.
- Functional assessments are made at a transit station and include physical, cognitive, vision, and functional abilities to use fixed-route - none of them at a medical diagnosis level but from a practical (functioning) level.

When asked what percentage of the applicants are determined not eligible due to physical assessments, 36 percent of the agencies responding indicated less than 1 percent, 24 percent indicated less than 10 percent, and 40 percent indicated 10 percent and above.

CONDITIONAL ELIGIBILITY

Conditional eligibility may be appropriate for individuals who can reasonably be expected to use fixed-route service for some trips when the environmental barriers that prevent travel are

not present. Barriers may include weather conditions, which may prevent use of fixed-route service by a person who is temperature-sensitive; variable conditions such as multiple sclerosis or the need for kidney dialysis that might prevent a person from riding fixed-route service depending upon their condition at the time of the trip; and environmental barriers such as lack of sidewalks or curb cuts that prevent a person from getting to or from a bus stop, or from using the bus stop, or if a lift cannot be deployed at the bus stop.

Figure 14 indicates that 78 percent of the agencies responding to the survey provide conditional eligibility certification for riders able to ride fixed-route service some of the time, while 28 percent of responding agencies did not make any trip by trip eligibility certifications.

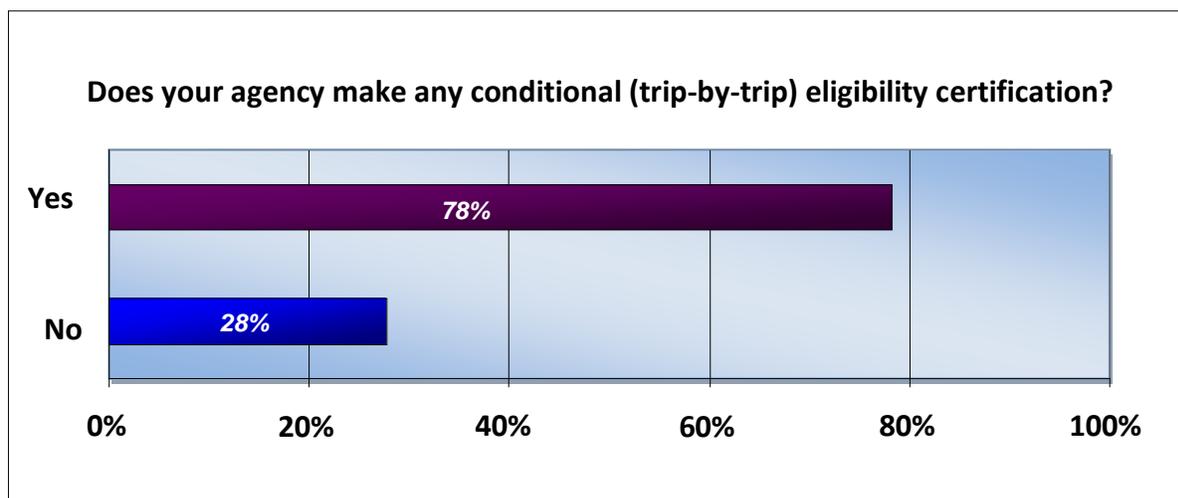


Figure 14. Make Conditional Trip Eligibility Certification?

Transit agencies were then asked if they allow current eligible ADA riders who become ineligible due to route improvements, facility makeovers for accessibility, or accessible vehicles to continue to ride as ADA eligible passengers. Figure 15 indicates that 51 percent continue to allow eligible ADA riders to continue after improvements have been made to the route.

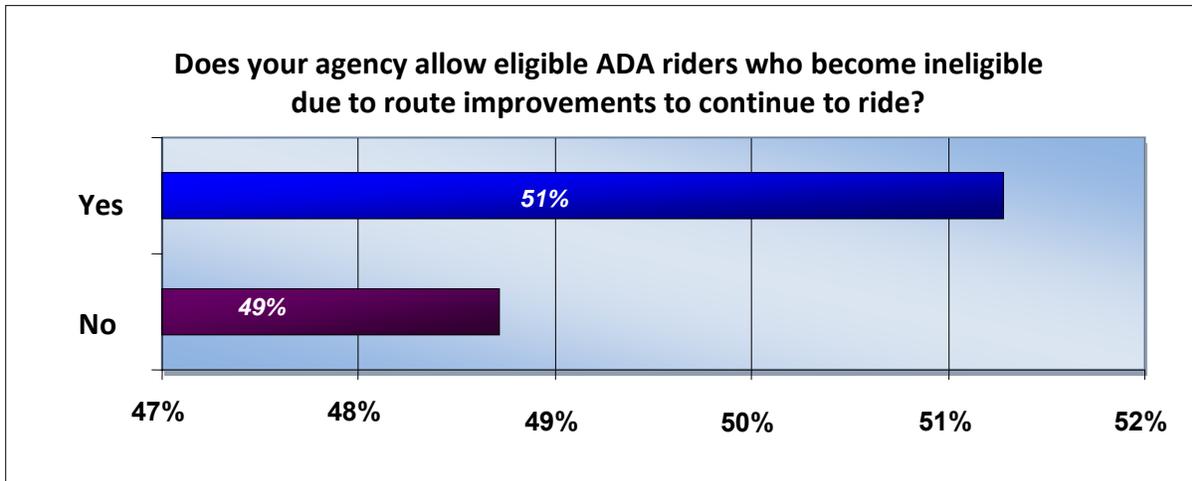


Figure 15. Allow ADA Riders Deemed Ineligible Due to Route Improvements?

One of the most effective and long-lasting techniques that can be employed to reduce the demand for ADA paratransit demand is training and encouraging existing paratransit passengers to use fixed-route transit service. This is a “win-win” proposition for both the transit system and the individual. The transit system is able to use excess capacity on its fixed-route system at minimal cost to the agency. With the ability to use the fixed-route system, the passenger can access a wider variety of services, does not have to pre-schedule his/her travel, and usually realizes cost savings in terms of lower fares.

One method to encourage paratransit passengers to use the fixed-route bus service is to offer free or subsidized passes. Figure 16 indicates that 61 percent of the responding transit agencies provide free or subsidized passes to paratransit passengers.

ADDITIONAL INFORMATION ON PASSES

- All seniors and *people with disabilities* with a regional reduced fare permit can ride fixed-route free 24/7.
- Half-fare all day, and a PCA rides free to assist on the bus.
- Transfers to/from fixed-route are "free" in some jurisdictions.

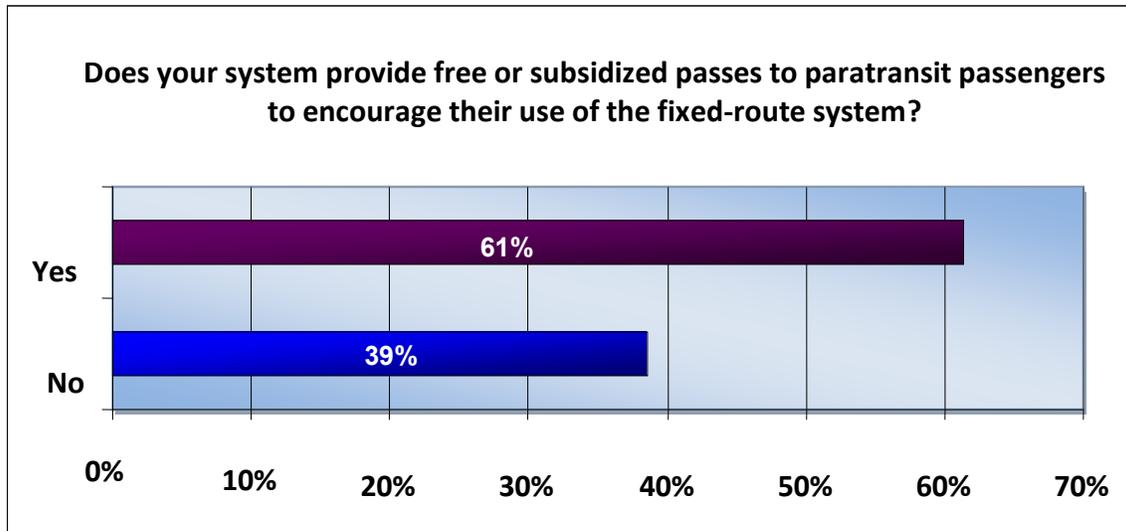


Figure 16. Offer Free or Subsidized Passes to Paratransit Passengers to Encourage Fixed-Route Use?

- Provide a reduced fare card to qualified customers with disabilities. The card allows the individual to ride regular fixed-route buses for 75 cents during off peak hours. Base fare is \$2.
- Passes for individuals found Not Eligible, and free travel training.
- ADA eligible passengers who show their ADA card on fixed-route service may have someone accompany them at no additional cost.
- Paratransit riders ride free on fixed-route services.
- If a person is granted eligibility, either full or conditional, they receive an ADA ID card that allows them to use the fixed-route for free during their period of eligibility, which is normally 3 years.
- Program allows a paratransit eligible person to ride fixed-route for free, and take someone with them for free on fixed-route.
- Encourage all passengers to use fixed-route if possible. If client uses fixed-route, the fare is half the regular fare. It has really been hard to encourage passengers on paratransit due to the fact that our service was free to eligible riders, now the fare is 50 cents without Medicaid card.

- Provide a Disability Fare Card which has to be applied for-automatic approval if paratransit eligible, \$5 card, good for 2 years on fixed-route--free to ride all they want.
- With paratransit eligibility, you can ride our fixed-route, light rail and, in the future, commuter rail for free by showing your paratransit ID card.
- Fixed-route fares are less than paratransit. Anyone who is ADA eligible can apply for a reduced fare permit that allows the reduced rate on fixed-route.
- ADA certified riders are automatically enrolled in the Limited Mobility Program, which charges riders with disabilities a reduced fare on the fixed-route of 50 cents.

TRAVEL TRAINING

The eligibility process can be used to identify the potential to use fixed-route service with some instruction. Individuals who might benefit from instruction or training are then offered this travel training. Figure 17 indicates that 73 percent of the transit agencies provide travel training to encourage fixed-route use, while 27 percent do not provide fixed-route training.

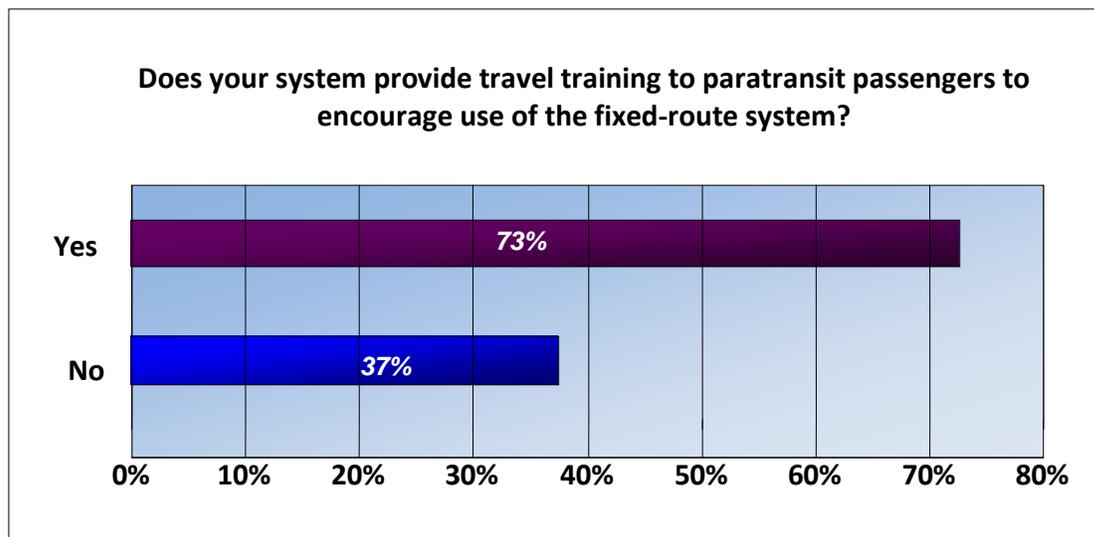


Figure 17. Provide Travel Training to Encourage Use of Fixed-route?

ADDITIONAL INFORMATION ON TRAVEL TRAINING

- When applicants indicate on their application that they could ride fixed-route with training, they are referred to the travel trainer.

- Agreements with professional trainers from city and suburban school districts - some JARC funds used.
- Only a handful of individuals are directly trained by transit each year.
- A bus familiarization program is offered, which covers everything from reading a schedule to obtaining travel information to practicing boarding the bus via the lift or ramp. In addition, we applied for a grant to offer destination-to-destination travel training to individuals with cognitive, visual, and physical disabilities. We hope to begin offering that type of training this summer.
- Travel Training used in conjunction with the eligibility process (to help soften the blow of a Not Eligible determination) and from referrals.
- One-on-one training is provided for a person who wishes to use the fixed-route system; 20 hours of training is provided, which includes classroom training as well as in-the-field training.
- Special Education teachers get to ride free with up to 5 students while travel training on our bus routes. It can be elementary, middle, or high school training. It has been very successful.
- Travel training is offered to individuals who are found ineligible for Paratransit. All applicants in the application are asked if they are interested in travel training; we also do outreach to organizations serving seniors and people with disabilities
- The Authority has a limited travel training program. What is provided is a buddy system where an employee from the eligibility office will ride with the passenger if they request assistance to train them on how to use the fixed-route.
- Training is provided to anyone who has a disability and could learn to use the bus with training. They must take the trip at least once a week for individual training. System training is provided if they need a general orientation. They do not need to be paratransit eligible; in fact, we prefer to train them before they apply for paratransit as many people don't like to give up curb- to-curb service once they start receiving it.
- We contract with a travel instructor and licensed O&M specialist to provide one-on-one training free of charge. We also do group travel trainings for seniors and folks with physical disabilities.

IMPROVEMENTS TO FIXED-ROUTE STOPS

Figure 18 Indicates that 81 percent of the transit agencies make improvements to fixed-route bus stops to make them accessible for paratransit passengers; 19 percent do not. This may indicate that the transit agency has no authority over the bus stops.

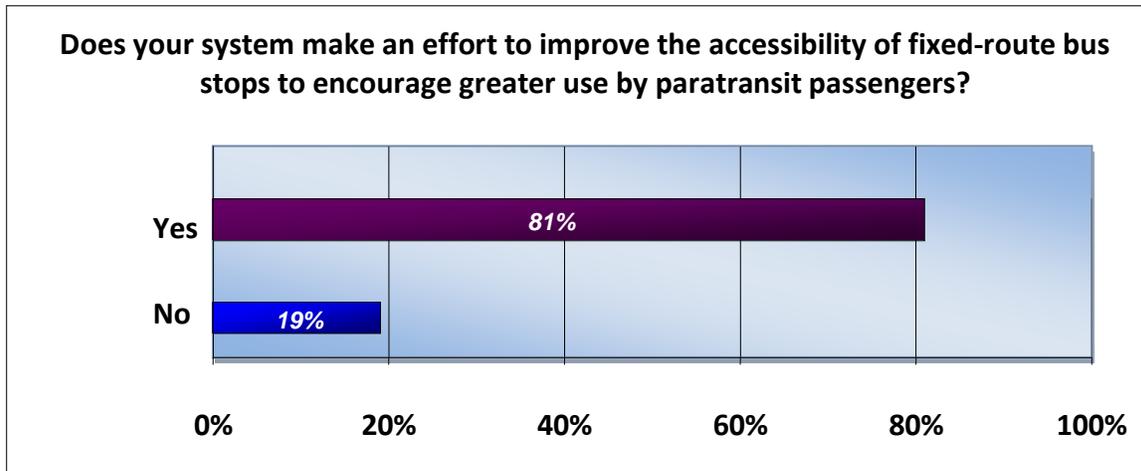


Figure 18. Improve Accessibility of Fixed-Route Stops to Encourage Use by Paratransit Passengers?

ADDITIONAL INFORMATION ON BUS IMPROVEMENTS

- Trips made ineligible due to inaccessible stops are referred to the transit system for improvement when possible.
- Long term goal is for all existing stops out of compliance to be modified according to ADA standards.
- Have a contract and a priority list to make most stops ADA compliant.
- If our agency is made aware of inaccessible bus stops, we work with city governments to address the issues.
- Block grants for new bus pads at stops are utilized. 100% of all fixed-route buses are low floor with ramps, not lifts.
- Brighter signage and talking bus technology.

- Bus stop improvement program, and work with jurisdictions to make the improvements.
- More curb cuts. Closer points of bus stop signs. Quicker service. More convenient times.
- Provide new accessible sidewalks, shelters, and working lifts on all fixed-route vehicles.
- Meetings with city council members to convince them of the importance to make the city bus stops ADA.
- Working with the city and to try and get accessible area at bus stops whenever possible.
- Each time a new stop is put in, an attempt is made to connect to a sidewalk, and if a bus shelter is placed at the location, then it is ADA compliant.
- Sidewalks, Braille signage, accessible seating, shelters, are coordinate with the City Sidewalk program.
- Installed accessible pads and shelters at bus stops in housing complex for persons with disabilities.
- Added shelters/pads at bus stops; pilot project to add fixed-route trips at certain intervals from senior high rises to grocery stores & other points of interest.
- Efforts are made to level areas around bus stops or to move bus stops to more accessible locations.
- Changed all shelters, adding our new logo, bus information, making it easier for passengers to understand the routes.
- Regularly surveys bus stops and shelters to verify accessibility.
- The District operates within four different California Counties. It works with local cities and counties that have jurisdiction over streets and roads to eliminate barriers to accessibility at bus stops it serves.
- Installing at least 25 benches and shelters per year. Preparing to install software so all fixed-route buses do automatic ADA callouts and bus identifications.
- Applied conditional eligibility to more people. The staff responsible for pathway reviews and identifies barriers, recommends bus stops for improvements, as well as type of

improvement. This often is making the stop lift/ramp accessible or providing benches so people have a place to sit while waiting for the bus.

ADA PARATRANSIT TRIPS LIMITED TO THE 3/4 MILE CORRIDOR

ADA paratransit basic service must be provided in an area centered on each fixed bus route and extending 3/4 of a mile to either side of the route. Figure 19 indicates that 52 percent of the responding agencies have limited ADA paratransit trips to the 3/4 mile corridor, while 48 percent do not.

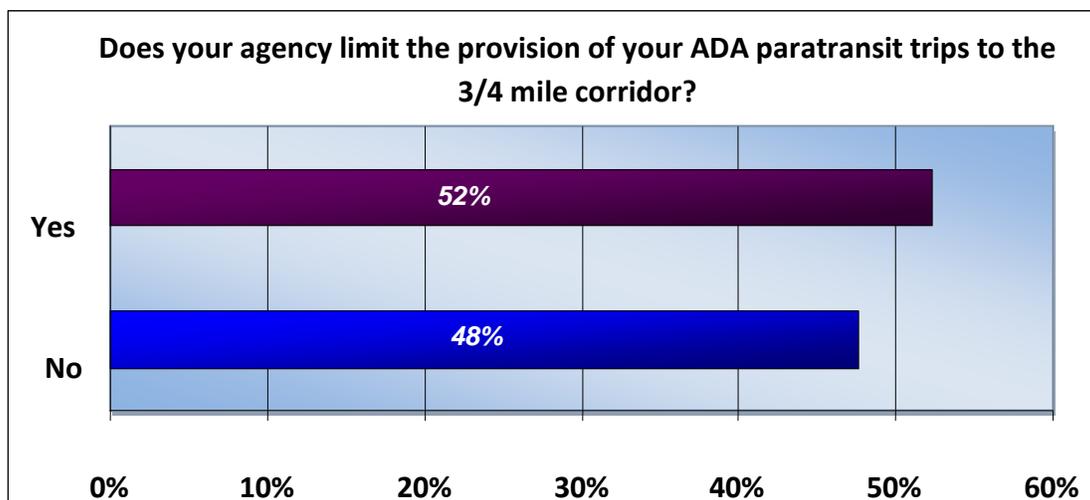


Figure 19. Limit the Provision of ADA Paratransit Trips to the 3/4 Mile Corridor?

CHARGE FOR SUPPLEMENTAL OR PREMIUM FARES FOR SERVICE BEYOND THE 3/4 MILE CORRIDOR

When agencies were asked if they charge for supplemental or premium fares for service beyond the 3/4 mile corridor, 73 percent indicated that they do not charge supplemental or premium fares; 27 percent do charge a supplemental or premium fare.

ADDITIONAL INFORMATION ON SUPPLEMENTAL OR PREMIUM FARES

- Ensure all trip pick-ups and destinations are within the 3/4 mile corridor.
- Service all citizens within the city, but limit service to 3/4 mile on routes bordering city limits. Don't charge a premium within city.

- Funding for services is provided by the State. They will only fund the 3/4 mile corridor.

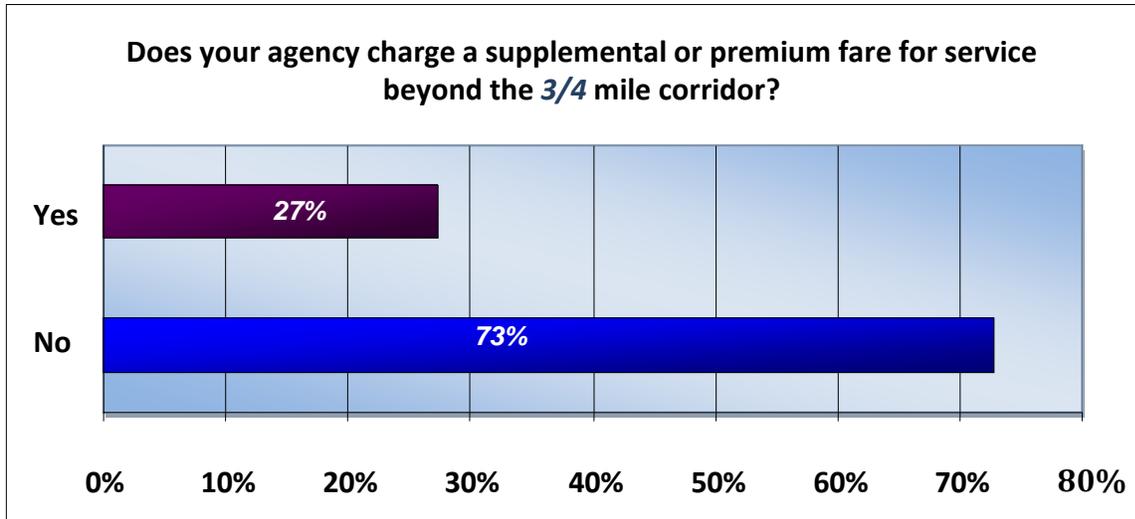


Figure 20. Charge a Supplemental or Premium Fare for Service Beyond the ¾ Mile Corridor?

- There are 5 separate ADA service providers in the region. Some jurisdictions exceed 3/4 mile, some do not, some charge a premium, and some do not.
- Monitored via service area maps when trips are booked.
- Provide only 3/4 mile corridor paratransit trips.
- In addition to the 3/4 of a mile corridor from fixed-route, there are many ADA core areas that are more than one mile from a fixed-route. We also operate curb-to-curb small bus service in communities outside the 3/4 of a mile corridor that act as feeder service into the ADA service area or connect with the fixed-route.
- The boundary is 3/4 mile from fixed-routes, not including commuter routes.
- We charge a \$5 fare for the area of town not served at all by a fixed-route. It is about 1 1/2 miles from the nearest route. Our normal \$2 fare applies to areas of town covered by a fixed-route, even if the route does not operate every day of the week.
- We only provide paratransit within the 3/4 mile corridor of our fixed-routes.
- We do not go beyond the 3/4 mile corridor.

- This is now a problem for us. We have had to tighten up on the 3/4 mile issues. Some of our clients were grandfathered in because we were providing service to them within the corridor; now they may have relocated outside the corridor.
- All ADA trips are provided within the 3/4 mile corridor. The Authority has Transportation Disadvantaged Funding (TD) that allows for trips outside the ADA corridor.
- All 3/4 mile trips are filled. Remaining capacity is provided to all other areas of the county. Premium fares are charged for rides in the county outside of the City limits.
- Limited resources.
- All ADA trips have to fall within 3/4 mile of our fixed-route system; if not, these clients are reclassified to regular riders, which limit certain privileges.
- Offers out-of-service area trips at an additional fare.
- To mirror Marin County local paratransit service policies, for regional trips, paratransit contractor may serve Marin origins and destinations beyond 3/4 mile on a space-available basis. 50 cents is added to the base fare for these extended trips. To avoid transfer trips, contractor may also go beyond the 3/4 mile corridor in Sonoma and San Francisco counties on behalf of the adjoining local operator, but this is not considered GGT service. Contractor does not provide extended service in the 4th (West Contra Costa) county served by GGT.
- Have expanded the service area to 1.5 miles on the eastern boundary and have filled in any gaps within the urban growth boundary.
- Provide paratransit service in a 3/4 mile corridor around our bus routes and within our current service area where an operating agreement exists with the adjoining governmental entity.

SAME-DAY TAXI SUBSIDY PROGRAM

A same-day taxi subsidy program supplements next-day ADA paratransit service, providing ADA riders with a more spontaneous option for travel and providing cost savings to the extent ADA riders chose the same-day program over next-day ADA Service. Figure 21 indicates that 88 percent of the respondents do not offer same-day taxi subsidies, while 11 percent do.

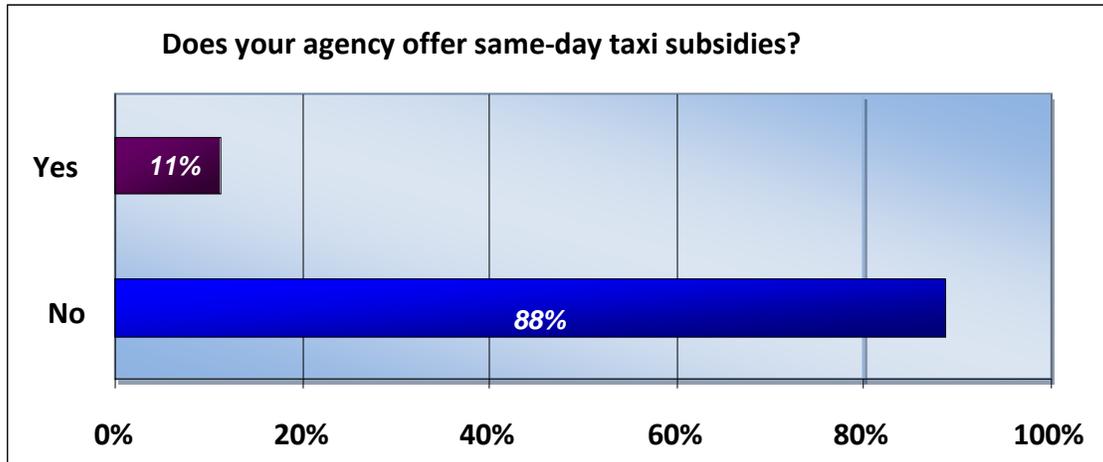


Figure 21. Offer Same-Day Taxi Subsidy?

ADDITIONAL INFORMATION ON SAME-DAY TAXI SUBSIDY

- These are funded by individual jurisdictions. Some do not offer same day taxi subsidy.
- Some clients are eligible per Muni policy.
- This is a longstanding program that is not dependent on ADA eligibility. To receive a subsidy, the person must be a King County resident over 18 years old with a disability, or over 65. Their income must be 70% or less of the median income, and they must qualify for a reduced fare permit that allows people to ride at a discounted rate on fixed-route. People can buy 7 \$10 books of scrip per month. Each book costs the customer 50%, and the agency pays the other 50% to the taxi company when they redeem the scrip.
- Riders of the premium same-day service pay the first \$7 of their cab fare. We then pay the rest up to a \$20 total. Riders pay anything over the \$20 mark (so we pay a max of \$13 per trip.)

IMPLEMENTATION OF PROGRAMS TO REDUCE OR MANAGE ADA PARATRANSIT COST

Figure 22 indicates that 59 percent of responding agencies indicated that had implemented programs to reduce or manage cost, while 40 percent indicated they did not.

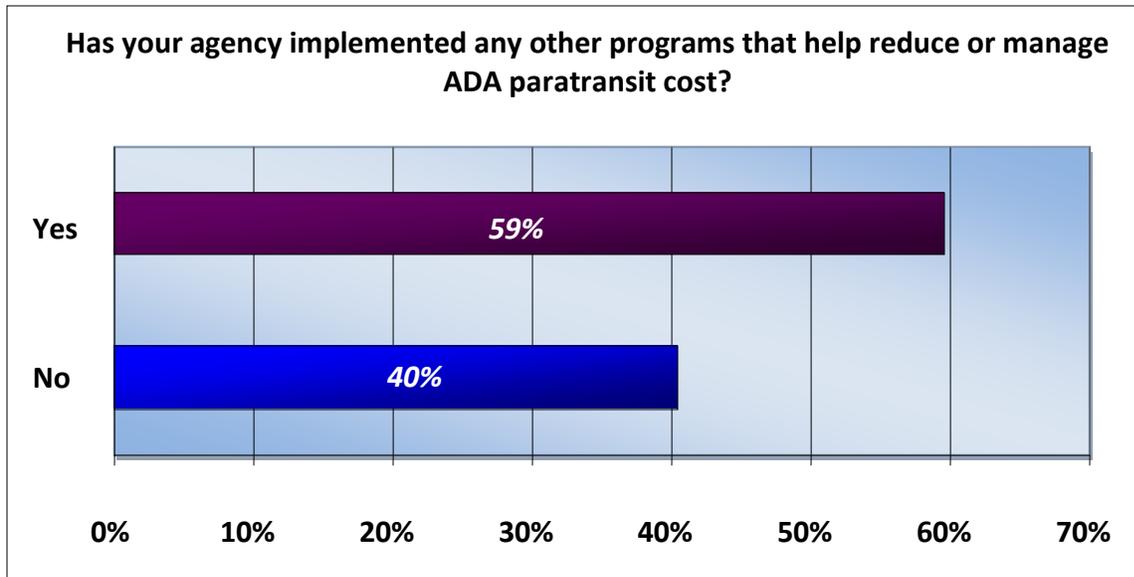


Figure 22. Implemented Any Other Programs that Help Reduce or Manage ADA Paratransit Cost?

PROGRAMS TO REDUCE OR MANAGE ADA PARATRANSIT COST

- Social Service Grants when appropriate.
- Take a closer look at re-certifications, working on better enforcement of our no-show policy, occasionally do conditional eligibility.
- Coordination, mobility management, funding agreements with agency sponsors.
- Mileage reimbursement, demand response dial-a-ride, free transfers to fixed-route (some jurisdictions, not all), limited travel training (handful of applicants trained each year.)
- Strict adherence to ADA eligibility criteria and application procedure. Travel training and bus pass for those not ADA eligible. Alternative programs where trip purposing is permitted, for limited, single destination trips.
- Contract with the regional transit system to provide our paratransit. By combining their in-town trips with our paratransit trips, the service is much more efficient and saves us about \$100,000 per year.
- Implemented excessive cancellation policy resulting in more responsible passenger scheduling.

- Took the lead in forming a non-profit agency, Full Access & Coordinated Transportation, which will be a brokerage of public and private transportation in our county. This coordinated effort will provide more effective use of resources, and should reduce the overall cost of paratransit.
- Allowing the paratransit eligible rider and their PCA to ride free aboard fixed route.
- Are now enforcing our no-show policy, and looking at our subscription trips and maybe an implementing a policy with subscription trips.
- The Authority has implemented and enforced the No-show policy to manage the rising cost from clients who no-show or late cancel trips. This has been a big success in reducing occurrences and managing costs.
- Automated scheduling, mobile data terminals, and AVL. Plans are underway to implement a system that will call customers with scheduled trips the evening before so they can confirm or cancel.
- Travel Training, enhanced technology, and accessibility to fixed-route. Do not penalize persons for using fixed-route by removing paratransit eligibility--they naturally use fixed-route more due to convenience and independence
- Have Dial-a-Ride service in two areas plus a service that transports people who live in senior housing complexes to shopping centers in the area.
- Volunteer peer travel training and Coordinated Agreements with social service agencies.
- Purchased scheduling software.
- Added sedans to service to reduce fuel costs of buses.
- Moving towards reducing services to only those that fall within 3/4 mile and are in 6-step implementation process. All new applicants must fall or get within the 3/4 mile for their origin and destination in order to receive transportation.
- Our original (1994-2003) paratransit service area used to include all of urbanized eastern Marin County without regard to the 3/4 mile ADA paratransit service area or time of day of the adjoining fixed-route service.
- When potential applicants call our paratransit number to get an application, the call taker explains the eligibility and mentions that we do have a travel training program. This greatly discourages many applicants from following through, thus limiting the

number of potential conditional customers and encouraging them to use the fixed-routes without applying for paratransit.

- Have a Community Access Transportation (CAT) Program where new or used vehicles are provided to agencies who provide at least 100 ADA boardings per month. They can use the vehicle for any client or any reason as long as they maintain the 100 ADA boardings. They provide the driver and do the scheduling, but we provide maintenance and in some cases fuel or additional subsidies. We retain ownership of the vehicle.
- Contract with social service providers to provide transportation for their ADA-certified consumers.
- Enforce no-show/late cancel sanctions.
- Partnership with Local County to share cost of paratransit rides.

Agencies were asked if they had any other suggestions or ideas they felt would be beneficial to others for managing the demand for ADA Paratransit programs.

OTHER SUGGESTIONS OR IDEAS BENEFICIAL FOR MANAGING ADA PARATRANSIT PROGRAMS

- Should follow the same guidelines of other social service grants. Transportation limited to the nearest facility/location of purpose. Limit number of daily trips to one round trip. Allocation of total trips should be tied to funding availability, as with all other paratransit service.
- Our focus in FY 07-08 is to further enhance our in-person assessment as part of the eligibility process.
- It appears the best strategy is to fund various low-cost alternatives to ADA paratransit which are usable to and appropriate for the customer, which are also more cost effective and efficient.
- We believe that by implementing conditional or trip-by-trip eligibility we have kept the growth at a reasonable level. This is evident by the number of successful lift/ramp boardings since we became 100% accessible (2004). In four years, the number of lift/ramp boardings by individuals using wheelchairs and scooters has more than doubled. Total successful boardings for each year are: 2004 - 10,426; 2005 - 16,701; 2006 - 19,381; 2007 - 23,167. If we were not 100% accessible, and we did not implement conditional eligibility, our paratransit trips would have increased significantly. Implementing conditional or trip-by-trip eligibility is necessary in order to

ensure that you meet the needs of those who cannot utilize fixed-route, within the budget constraints that we all face. If you do choose to go that route, every effort should be made to communicate change to your customers and to work with fixed-route drivers so that they are prepared to address any issues that occur. The driver's attitude goes a long way towards making the person with a disability feel welcome. It also helps to work with other agencies that are funded to provide paratransit services in your area, to reduce the effects of shedding.

- More networking with major destinations partner agencies to curtail "client dumping"; more incentives for agencies to do trips for their clients to/from their center; greater use of temporary and conditional eligibility when appropriate.
- Contract with lift-equipped local taxi service for late night and weekend ADA trips. Start a "bus buddy" program where passengers with disabilities are given courtesy tickets or a monthly pass to ride with passengers who the travel trainer has deemed capable of riding fixed-route but are simply afraid or inexperienced to do so and prefer using ADA.
- Work with the local cab companies to buy accessible cabs to assist in peak demand times. Partner with the special education departments at local schools to provide travel training to students with disabilities as part of their curriculum.
- We are developing a program that will provide accurate bus stop accessibility information for our contractor and for our riders, enabling those with conditional, trip-by-trip determinations to better plan their trips and utilize fixed-route when appropriate. Implement above and beyond service on fixed-route, e.g., provide a 60+ program for the seniors that would be transported free of charge.
- Functional assessments and in-person interviews are very important, as is travel training. Meeting regularly with the advocacy group is absolutely imperative to ensure that the disabled community is aware of how the system works and to address any issues that may be common to a group of customers or all customers.
- Develop a working relationship with agencies that refer customers, make sure they have a good handle on what the ADA service area is for paratransit, and train customer service staff on the differences in service between ADA and non-ADA service.
- Public education.
- Establish routes based on your existing routine trips or patterns.

- We are in the process of hiring a Mobility Coordinator to try and migrate and make it easier for our ADA clients to utilize our system with comfort.
- Provide more ADA/paratransit grant money.
- Our in-person assessment has been tremendously successful for us in managing demand. When we moved from the paper application to the in-person assessment we saw up to an 84% self-elimination rate in some of our outlying counties. We provide transportation only to those eligible based on trip-by-trip eligibility and feed riders into our fixed-route services for full integration of transportation.
- Figure out a way to realistically adhere to trip-by-trip eligibility, or effectively schedule paratransit rides to and from fixed-route bus stop locations that passengers can use.
- We are working on a Transit Resource Center that will be located where the in-person evaluations are performed. The resource center will provide information about all the services offered and promotes using the fixed-route bus whenever possible. We are restructuring travel training so more people will have a better assessment about whether they are a good candidate for travel training when they go for the in-person evaluation. Many people could use the bus with training, but won't agree to the training for a variety of reasons, so we hope these efforts will help get more people on the bus.

CHAPTER FOUR
ADA PARATRANSIT ELIGIBILITY CASE STUDIES

Chapter Four builds on the previous chapters by selecting 10 agencies who responded to the survey that represent various size systems and geographic distribution for in-depth interviews and case studies. During the interview, the agencies were asked to describe what changes they made to their ADA eligibility process and the reason for the changes. The agencies were asked to describe their current certification process, ADA polices, and alternative mobility options such as travel training, financial incentives, and bus stops improvements. This chapter provides a summary of these interviews, organizing the findings by the following categories:

- Overview of Agency Approach
- Certification Process
- ADA Policies and Process
- Alternative Mobility Options

Table 3. Agency Case Studies

Broward County Office of Transportation Broward County, Florida	North County Transit District Oceanside, California
Jacksonville Transportation Authority (JTA) Jacksonville, Florida	The Rapid Grand Rapids, Michigan
Regional Transit System (RTS) Gainesville, Florida	Special Transportation System (STS)- Charlotte Area Transit System(CAT) Charlotte, North Carolina
Sarasota County Area Transit (SCAT) Sarasota, Florida	Utah Transit Authority Salt Lake City, Utah
Metro Mobility St. Paul, Minnesota	Winston Salem Transit Authority Winston Salem, North Carolina

**BROWARD COUNTY OFFICE OF TRANSPORTATION
BROWARD COUNTY, FLORIDA**

Participants:

Broward County Office of Transportation: Steve Kidd, Paratransit Supervisor

CUTR: Deborah Sapper and Jay Goodwill

CERTIFICATION APPROACH

Broward County Transportation has enforced strict adherence to ADA eligibility criteria and application procedures. Travel training and bus passes are provided for those not ADA eligible, as are alternative programs where trip purposing is permitted, for limited, single-destination trips.

Broward County Transportation has seen an increase in ADA applications due to an increase in gas prices, as more people who could not afford gas are turning to paratransit for their transportation. They are also seeing an increase in “client dumping,” with agencies going out of business and telling their clients they are eligible for ADA paratransit without explaining the ADA process to them. Broward County is also seeing an increase in younger people applying for ADA Paratransit than in the past.

CERTIFICATION PROCESS

New applications are reviewed for completeness. Every question has to be answered or the form is returned. Broward County does not accept applications that are not completely filled out. Many of the forms that are returned to the applicant to complete are not returned.

Recertifications are done every three years using an easy form. Clients using the easy form are clients that will never be able to ride fixed-route bus service.

In-person functional evaluation is usually required to determine if the applicant can use the Broward County Transportation fixed-route system. A letter is sent to the applicant notifying him/her to come in for an in-person functional assessment and that the appointment must be made within 10 days. Transportation assistance is provided as necessary to and from the evaluation appointment. The purpose of the evaluation is to determine when and under what circumstances the applicant can use BCT buses and when paratransit shared-ride service is required.

The **functional physical evaluation** consists of a simulated bus travel experience, including boarding a bus, maneuvering a curb and a curb cut, and crossing the street. Skills evaluated include balance, strength, coordination, and range of motion.

The **cognitive functional assessment** consists of standardized tests designed to measure skills such as memory, attention span, and route-finding ability. Functional vision and respiratory considerations are reviewed. Variables in the environment, as well as the applicant's ability to perform the tasks required to use the bus, are also considered.

Conditional eligibility is assigned to persons who are able to use BCT buses most of the time, but would, under certain circumstances and for certain trips, be prevented from using BCT buses independently.

About ten percent of applicants are denied ADA eligibility. Applicants denied ADA paratransit service are a 100 percent eligible for free fixed-route bus passes and travel training.

ADA POLICIES AND PROCESS

A client with more than four **no-shows** may be suspended. Before the client is suspended, a letter is sent to client warning them that continued no-shows will lead to suspension. A letter is also set to the provider to identify any issues that might be the cause for the no-show.

Appeal Process - Applicants who are determined not eligible, or who do not agree with the conditions established for their use of BCT ADA Paratransit Service, may request a review at an informal or formal hearing level.

ALTERNATIVE MOBILITY OPTIONS

Travel training is a free program to help clients use the fixed-route bus service. A professional instructor provides personal and group lessons at no charge to teach riders how to use county buses.

Free fixed-route bus passes are available for any registered paratransit rider with current eligibility. The use of the fixed-route benefit will not impact paratransit eligibility. Broward County Transportation maintains a priority list of **bus stops** that need to be ADA compliant.

JACKSONVILLE TRANSPORTATION AUTHORITY (JTA) JACKSONVILLE, FLORIDA

Participants:

JTA: Janell Demato

CUTR: Deborah Sapper and Jay Goodwill

CERTIFICATION APPROACH

JTA brought its certification process in-house in January 2007 after contracting it out.

In 2007, JTA experienced a 64 percent decrease in new applications, from 1,897 in 2006 to 678 in 2007, mainly due to the new applicant form and in-person interviews. Reasons cited by JTA are better explanation of what ADA paratransit service is and, a better description of fixed-route options, and professional verification.

CERTIFICATION PROCESS

JTA does **in-person interviews** with 100 percent of the applicants. In-person interviews and functional assessments are based on the Easter Seals Model. Transportation to the interview is provided.

If JTA determines that a **functional assessment** is needed, it is conducted by Baptist Occupational Health immediately following the interview.

JTA employs three intake persons. All clients who come through the process are required to undergo the functional assessment unless they have a condition that cannot be assessed, such as seizures, a psychiatric condition, or legal blindness. Some conditions, such as MS, also are assessed and, with doctors information and other supporting documentation, are a part of the decision.

JTA has undertaken a **recertification** of its 6,600 certified passengers. To date, 5,200 have been completed, with 1,400 remaining. JTA reported that only 38 percent of its certified passengers responded to the request to recertify. Reasons could include an outdated registration list, not wanting to complete process due to not using services, better explanation of current JTA service, etc. JTA's recertification process now on three-year schedule

As of December 2008, 10 percent of 1,282 new applicants were denied. Reasons for denials include mobility testing (capable of using fixed-route) and cognitive ability to use fixed-route (using Easter Seals test).

ADA POLICIES AND PROCESS

JTA reduced **no-shows** from 5,500 per month to 1,200-1,400 per month. First-time and second-time no-shows result in a call to the passenger. If there is no response, the passenger is flagged at the reservation process. If contacted, an explanation is sought, and the client is given an education on the impacts, provided with ridership tips, and referred to other community resources.

JTA has an **appeal process** with four committee members (JTA staff). The process has upheld approximately 98 percent of initial determinations.

ALTERNATIVE MOBILITY OPTIONS

Travel training is funded with FTA 5317 funding. JTA uses the $\frac{3}{4}$ mile **ADA corridor**. ADA-certified passengers can ride fixed-route for 25 cents. **Bus stop improvements** and shelters are under control of the City. All of JTA's new stops are ADA compliant.

REGIONAL TRANSIT SYSTEM (RTS) GAINESVILLE, FLORIDA

Participants:

RTS: Millie Crawford, ADA Coordinator

RTS Contractor: Staci Gall, ADA Transportation Program Director, Center for Independent Living of North Central Florida

CUTR: Jay Goodwill

CERTIFICATION APPROACH

The number of applicants is currently averaging around 100 per month, up from 60. The increase is due to cuts in Medicaid (i.e., trip dumping). RTS made changes to its application form in August 2008 based on recommendations from an ADA consultant study (Russ Thatcher).

Changes included:

- Focus on functional assessment and not just medical condition
- Inclusion of architectural and environment barrier questions
- Improved questions to be completed by the physician and professional verification
- Addition of question to provide total weight of applicant (person plus mobility device)

CERTIFICATION PROCESS

All **applicants** must participate in a face-to-face interview at the Center for Independent Living. The applicants do not need to fill out the application prior to the interview; the application is completed at the interview.

The **interview** process is used as an opportunity to provide advice and guidance on other non-mobility services that the applicant may be able to use. No functional assessments are undertaken other than observations during the interview process.

The Center for Independent Living then follows up with the applicants' health professionals and makes the ADA paratransit eligibility decision (not made by RTS).

ADA POLICIES AND PROCESS

RTS uses the $\frac{3}{4}$ **mile corridor limits** only outside the city limits. ADA paratransit service is provided to all areas within the city limits. RTS is not currently using Conditional Eligibility but is compiling data to support it in the future.

Recertification is done every three years. This includes the full process and the issuing of a new photo ID card. RTS receives very few **appeals**.

A new “**no show/late cancellation policy**” was recently implemented. Late cancellation is considered to be less than two hours prior to pickup time. The new policy is that if the client’s late/no-show rate is higher than 10 percent of total trips, he/she is subject to suspension on a progressive scale.

ALTERNATIVE MOBILITY OPTIONS

ADA-certified passengers can ride RTS fixed-route service for free by showing their ADA photo ID card.

Travel training is limited to funding availability. RTS has an active **bus stop improvement program**, including a database with photos. RTS has applied to use Federal Stimulus funding for bus stop improvements.

Fixed-route operator training is provided by the Center for Independent Living.

SARASOTA COUNTY AREA TRANSIT (SCAT) SARASOTA, FLORIDA

Participants:

SCAT: Beverly Kent, Dominick Locascio, Michael Veira

CUTR: Deborah Sapper and Jay Goodwill

CERTIFICATION APPROACH

SCAT's ADA certification changes were budget-driven; paratransit trips accounted for 10 percent of system trips, but over 30 percent of the budget. Old policies provided for ADA paratransit service beyond the minimum $\frac{3}{4}$ mile corridor. Prior to recent changes, ADA eligibility was contracted to Easter Seals to determine eligibility, but minimal scrutiny of applications was undertaken.

In 2003, SCAT made the following changes to the ADA eligibility process:

- Limited ADA eligibility to the $\frac{3}{4}$ mile corridor
- Strictly followed definitions of ADA eligibility
- Modified application form to better assess applicant functional ability with less focus on disability
- Added income verification for transportation-disadvantaged-sponsored trips

SCAT brought the eligibility process in-house and created two new positions:

- Mobility Coordinator, responsible for eligibility process
- Travel Trainer, responsible for training ADA-certified passengers and ADA ineligible passengers on how to use fixed-route service

SCAT conducted recertification of all existing ADA-eligible clients using the new procedures and processes. This process took 18 months to complete. SCAT indicated that some certified passengers chose not to participate in the recertification process – but didn't provide a percentage estimate. SCAT recertification is done every three years.

The new certification process was modeled after Hillsborough County and Project ACTION.

Improved bus operator training, specifically directed toward ADA passengers includes:

- Bus stop announcements

- Sensitivity training
- Wheelchair tie-down procedures
- How to dealing with service animals
- Hands-on training experiences

CERTIFICATION PROCESS

All applications are reviewed by the Mobility Manager. **Applications** must be complete, including independent verification from a health care professional. Unless the application provides a clear indication of eligibility, all applicants are asked to come to the SCAT offices for an interview and functional assessment, if needed. SCAT provides free paratransit service to the applicants, if necessary.

Applicants first meet with the Mobility Manager for an interview to explain the ADA service and the ADA paratransit eligibility process. During the interview, the Mobility Manager reviews the application form and attempts to assess the qualifications of the applicant through observation and conversation.

After the interview process, some applicants are determined eligible and are not required to undergo the functional assessment process. For the remainder of the applicants (40 to 45%), the Mobility Manager sends the applicant to the maintenance garage to demonstrate his/her ability to board and alight a bus. Based upon observations and the interview, the Mobility Manager makes a determination on the person's ADA eligibility.

SCAT indicated that 17 percent of applicants (including approximately 9 percent of which were denied) are diverted to fixed-route service. Fewer than 4 percent are given conditional eligibility; the determination is made on a trip-by-trip basis at the time of reservations.

ADA POLICIES AND PROCESS

SCAT provides an appeal process for any applicant given conditional certification or denied certification. SCAT's **appeal process** uses independent professionals as members of the appeal panel in addition to SCAT staff members. The appeal board determination is forwarded to the SCAT General Manager who makes the final decision.

SCAT's ADA **visitor policy** follows FTA requirements.

ALTERNATIVE MOBILITY OPTIONS

Travel training is offered to all denied applicants and those eligible applicants who have potential to use fixed-route service for some of their travel needs.

SCAT has a dedicated Travel Trainer who trains approximately 120 individuals per year. In addition to working with individuals, the Travel Trainer also provides group training at facilities (such as nursing homes, senior centers, high schools, etc.) SCAT also uses volunteers who function as “SCAT Ambassadors” to provide peer training. The certification demand has leveled off due to outreach and education.

SCAT provides very strong **financial incentives** for ADA applicants to use fixed-route service, including:

- Free bus passes to all ADA eligible passengers
- Discounted bus passes (\$2 per month) for those individuals determined ineligible for the ADA paratransit service

SCAT currently provides approximately 650 bus passes per month to these groups.

SCAT has an active **bus stop improvement program** to improve ADA accessibility to and at the bus stops. All SCAT buses are wheelchair accessible.

METRO MOBILITY ST. PAUL, MINNESOTA

Participants:

Metro Mobility: Andy Streasick, ADA Paratransit Evaluator

CUTR: Deborah Sapper and Jay Goodwill

CERTIFICATION APPROACH

Five years ago, Metro Mobility was using self-certification and no assessment; applicants completed an application and stated the reason they could not use fixed-route. After that, it implemented in-person assessment, which was contracted out for a short time.

Three years ago, Metro Mobility implemented professional verification of the applicant by a physician, nurse, licensed independent social worker, psychologist, psychiatrist, occupation or physical therapist, certified rehab counselor, certified orientation and mobility specialist, certified recreational therapist, and/or speech language pathologist.

CERTIFICATION PROCESS

In addition to professional verification, the application now asks for more details regarding fixed-route travel than in the past. In addition to asking if an applicant uses fixed-route, it now asks about frequency and the number of destinations reached.

If there is still some question of an applicant's eligibility, he/she meets with Metro Mobility staff for an interview and perhaps a physical or cognitive assessment using the Tinetti gait and balance test, FACTS, and traveling out into the community as needed.

Minnesota currently does not enforce conditional eligibility. There is no difference in conditional eligibility versus full eligibility. Of those certified, one quarter would be conditional.

ADA POLICIES AND PROCESS

Some applications are denied as a result of not completing the paper application.

The appeal process varies depending on what has already been done. If denied, an appeal can be made by letter. The applicant can explain and submit additional information, which then goes to

a six-member appeal board. Some are denied based on their paper applications; an in-person assessment can be done if one has not been done already.

Recertifications are matched with Minnesota State ID or driver's license. Recertification is based on when the client's Minnesota ID expires, then every four years.

Riders who accumulate three **no-shows** within a 30-day period receive a warning letter from the Metro Mobility Service Center. If the rider receives a fourth no-show within 30 days of the first, they could be suspended. The suspension begins 30 days from the date of the suspension notification, which is sent by registered mail. The terms of the suspension are as follows:

- First suspension – up to 2 weeks
- Second suspension – up to 4 weeks (within a 12-month period)
- Third or more – up to 6 weeks

If riders can explain the no-show and try to resolve the problem, the suspension can be delayed for 30 days or it may be dropped.

ALTERNATIVE MOBILITY OPTIONS

Travel training is done through a contract with a travel instructor and licensed Orientation and Mobility specialist to provide one-on-one training free of charge. Also, group travel training is available for seniors and the physical disabled.

ADA-certified riders are automatically enrolled in the Limited Mobility Program, which charges riders with disabilities a **reduced fare of \$0.75** on the fixed route.

Metro Mobility offers **same-day taxi subsidies** to riders of premium same-day service, who pay the first \$7 of their cab fare. Metro Mobility then pays the remainder, up to \$20. Riders are responsible for costs over \$20. (Metro Mobility pays a maximum of \$13 per trip.)

Bus stop improvements are done through the Metropolitan Council who looks at streetscapes and pedestrian movement issues.

Metro Mobility also contracts with social service providers to provide transportation for its ADA-certified consumers.

NORTH COUNTY TRANSIT DISTRICT OCEANSIDE, CALIFORNIA

Participants:

North County Transit District: Alane Haynes, Accessible Services Administrator

CUTR: Deborah Sapper and Jay Goodwill

CERTIFICATION APPROACH

A Paratransit Improvement Study was recently done. Application forms were revised to better determine the person's functional abilities, and application was made easier to understand. North County started out with a self-evaluation form and contracted out one-third of its functional assessments. Previously, a paper assessment process was used for all applicants. At that time, North County Transit contracted out one-third of their functional assessments and had a 15 percent denial rate, primarily due to failure to complete the process.

Approximately two-thirds of applicants have an **in-person interview**, which usually includes some form of **physical assessment**.

North County transit receives about 75 new applications a month. Most of the **ineligibles** are self-denied by people not showing up for the interview.

North County Transit uses a contracted service that uses a web-based application process. This new process focuses on the applicant's functionality rather than disability. The new process has resulted in a 4 percent denial rate.

North County Transit took the lead in forming a non-profit agency, "Full Access and Coordinated Transportation," which will broker public and private transportation in the county. This coordinated effort will provide more effective use of resources and should reduce the overall cost of paratransit.

CERTIFICATION PROCESS

In July 2007, North County Transit contracted all functional assessments to "ADA Ride," with all applications being processed through the ADA Ride website. An overview of the ADA Ride service is included at the end of this section.

Recertification is done every three years.

Fixed-route service has been cut. Dial-a-Ride has been cut back while population has increased.

ADA POLICIES AND PROCESS

No-Show Policy

North County Transit has a 60-minute cancellation policy, which has reduced no-shows by 50 percent:

- First no-show - warning and letter
- Second no-show - customer pays for the trip unless excused
- Third no-show - suspension

North County Transit has a two-day reservation window; formerly it was 14 days.

Appeals can be submitted in writing to the ADA Coordinator with additional information. The ADA Coordinator provides a written determination as to the validity of the complaint and a description of the resolution, and a copy is forwarded to the complainant. The complainant can request a reconsideration of the case in instances where he/she is dissatisfied with the resolution. The request is forwarded to the Executive Director for a final determination. Their recent appeals history of three per month has indicated that all agency determinations have been upheld.

ALTERNATIVE MOBILITY OPTIONS

North County Transit provides paratransit only within the **3/4 mile corridor** of fixed-route service.

Travel training has been conducted since 2006; it is offered to individuals who are found ineligible for paratransit, and all applicants on the application are asked if they are interested in travel training. Types of travel training include mobility training and trip-by-trip. Individual, group, and buddy-up training are provided to organizations serving seniors and people with disabilities.

Reduced fares are available to persons who are certified to use paratransit and can ride the fixed-route system for free if they get a photo identification card that identifies them as paratransit eligible.

Personal Care Attendants (PCAs) ride free when accompanying a person who is ADA-certified to use paratransit LIFT services. ADA-certified passengers who use the assistance of a PCA need to show their NCTD Paratransit Reduced Fare ID Card.

North County Transit has a **bus stop improvement program** in which they work with local jurisdictions who are the property owners to make the improvements. North County Transit is currently developing a program that will provide accurate **bus stop accessibility** information for contractors and riders, enabling those with conditional, trip-by-trip determinations to better plan their trips and use fixed-route when appropriate.

ADARIDE.Com

6151 West Century Blvd. Suite #304
Los Angeles, CA 90045-5307
ADA Ride Contract: Art Hulscher

ADARIDE is professionally-based, on-line verification process. The application is filled out on-line by the applicant, and the health care verification form is filled out by the treating health care professional. Ninety-five percent of ADARIDE eligibility is determined on-line, and 20 percent of applicants go through a Functional Assessment, resulting in half the cost of an in-person assessment.

ADARIDE's evaluation team consists of professionals who not only have conducted thousands of in-person functional assessments but also continue to provide treatment and prognostic services to clients/patients in their respective fields. This combination of experience, practice, and education gives ADARIDE evaluations a complete and accurate understanding of applicant's eligibility for paratransit.

A treating professional may not know that his/her client/patient can navigate a public bus system but will know if there is memory impairment, ability to pay bills and schedule appointments, etc. When treating healthcare professionals are asked the right questions, ADARIDE's trained professional evaluators can make very clear and accurate determinations.

If there is a need for more information from the application or healthcare verification, ADARIDE evaluators and quality assurance administrators make follow-up phone calls to the applicant and the treating professional(s) as well as emergency contacts (as permission in the application) for clarification.

**SPECIAL TRANSPORTATION SYSTEM (STS)
CHARLOTTE AREA TRANSIT SYSTEM (CAT)
CHARLOTTE, NORTH CAROLINA**

Participants:

Special Transportation System: Peter Wallace, General Manager, STS

CUTR: Deborah Sapper and Jay Goodwill

CERTIFICATION APPROACH

Historically, ADA eligibility was done through a paper application provided by the customer, and all applications were accepted because buses were not ADA accessible. When CAT's fleet became accessible, the eligibility process was changed. CAT started conducting functional assessments for new and recertified customers at the Functional Assessment Center at its downtown Transit Center. CAT met with local agencies and received input from a local advocacy board to develop a new process since the demand for ADA paratransit trips was outpacing the agency's ability to expand.

CAT issued a Request for Proposals for Functional Assessment following the Eastern Seals process. Three responses were received, but none met the minimum requirements. Carolina Medical Center (Charlotte Rehab) expressed an interest and drafted a contract. That effort was delayed due to the inability to resolve legal issues. April 2005 was the tentative start date, but due to the legal issues the contract was not signed until July 2006.

CAT's ADA eligibility process was contracted out because it did not want the functional process of ADA to be in-house and Charlotte Rehab was well known in community. Charlotte Rehab began conducting in-person interviews and functional assessments on July 24, 2006.

Recertification of CAT's 4,933 Special Transportation System (STS) clients was done in alphabetical order from August 2006 through June 2008. During this period, 1,180 clients were recertified; 722 clients did not complete the process and were transitioned out of the ADA paratransit service.

CAT also received 3,829 new requests for ADA eligibility, of which 1,481 completed the process; 2,348 did not complete the application process.

As of December of 2008, STS had 1,484 new applications, with 1,180 recertified, bringing its total eligible client base to 2,066.

Over the course of the program, CAT solved a lot of potential problems before the problems occurred, which was very cost effective and caused few complaints from users.

Functional assessments and in-person interviews are very important, as is travel training. CAT staff stated that meeting regularly with the advocacy group is absolutely imperative to ensure that the disabled community is aware of how the system works and to address any issues that may be common to a group of customers or all customers. The transition has resulted in a "win-win" for everyone and has given riders more independence.

The average cost per assessment is \$96.94, approximately equivalent to the cost of three rides. CAT finds this very cost effective, which includes cost specialist, interpreters, and ADA certification training.

CERTIFICATION PROCESS

The **application** was revised to collect more accurate information regarding the applicant's disability. Applicants come in for interviews, and **functional assessments** are done on a course around the transit center. The Functional Assessment Center has two interview rooms and a scale to weigh the passenger and chair. Functional assessments meet Project Action Guidelines.

Eligible or conditional clients are **recertified** for five years; while seniors or special needs clients are recertified for 20 years.

The assessments are provided to CAT with recommendations, and CAT makes the final decision.

ADA POLICIES AND PROCESS

After the first no-show, a warning letter is sent out. Four no-shows in 30 days results in a 30-day suspension. STS has had no suspensions in the last five years.

An individual who has been **denied** or has conditions placed on his/her use has the right to appeal the evaluation. An independent panel has been established to hear appeals; the panel includes a person with a disability. All appeals must be in writing and received within 60 days after written notice of the eligibility determination decision has been received.

STS has developed an Appeals Manual and during the process has created a new Appeals Board. The manual is provided to all customers. Appeals are submitted to staff, then to the Appeals Board.

Of new applicants, 150 were denied, a 10.1% denial rate. Additionally, 43 recertification requests were denied.

As of the end of January 2009, there were 2,549 active customers, but only 1,146 actually used the service in 2008.

ALTERNATIVE MOBILITY OPTIONS

STS provides services within $\frac{3}{4}$ miles of all local fixed-route bus routes. STS will provide service throughout the Charlotte city limits as capacity allows and the unincorporated areas of Mecklenburg County.

Free rides are provided to clients for functional assessments when applying for recertification.

Bus stops include special poles for Braille, platforms, and big sidewalk program. Problems exist with state roads.

Fixed-route operator training is done by the Advocacy Council.

Travel training is done by CAT's Operations Department and the Association for the Blind.

Half-fares on fixed-route service is provided to ADA-eligible passengers as an incentive to use the service. Due to the discounted cost savings on fixed-route versus paratransit, this incentive could result in financial savings. There were 5,000 wheelchairs lift deployments per month on the fixed-route service.

THE RAPID GRAND RAPIDS, MICHIGAN

Participants:

The Rapid: Meegan Joyce , Special Services Manager

CUTR: Deborah Sapper and Jay Goodwill

CERTIFICATION APPROACH

The only change to the paratransit certification process has been that the application now requires professional verification. The Rapid receives anywhere from 85 to 100 new applications per month and about six appeals per years. As of one year ago, all ADA-eligible passengers are given a free fixed-route pass.

CERTIFICATION PROCESS

The **application** can be completed and submitted on-line. The **professional verification form** must be filled out by a physician, psychologist, or rehabilitation specialist to verify the disability. The professional verification form may be printed out to give to the professional and then returned to The Rapid by mail.

Fully-completed applications are processed as quickly as possible. Only original applications are permitted; duplicate applications are not accepted.

In-person assessments are done by the travel trainer and occupational therapist. About 60 percent of applicants are seen in person. Senior applicants (age 80+) are not required to come for an in-person assessment. Applicants come in to the transit center, and depending on the disability, are asked to do various tasks that are required to take the bus. An occupational therapist and the travel trainer perform most assessments; the O&M instructor comes in for applicants with visual impairments. When an applicant comes in, his/her picture is taken and, depending on the eligibility status after the in-person assessment, he/she is sent either a free fixed-route pass or, if denied, a reduced fare fixed-route pass.

Recertification is done every three years. Some recertifications are changed to conditional. The Rapid has seen all recertification's at least once.

Forty-four percent of applicants are **denied** ADA paratransit eligibility. If an applicant does not agree with the decision, there is an opportunity to appeal the decision. A majority of applicants that are denied are given conditional eligibility based on environmental conditions and are offered travel training and reduced fares for a fixed-route pass.

ADA POLICIES AND PROCESS

The Rapid operates Paratransit service within a **3/4 mile service area** within six cities. Paratransit service operates anywhere within the boundaries of the six cities.

If a client has two or more **no-shows** in a month, a notification letter is sent indicating that a third no-show will be cause for suspension of the service. Clients are asked to call to discuss the no shows. No-show problems are mainly resolved through phone calls.

ALTERNATIVE MOBILITY OPTIONS

The Rapid rare **incentives** include:

- 31-Day Pass (Seniors and People with Disabilities) - \$26.00
- Reduced Fare 10-Ride Card - \$7.50
- GO!Bus ADA-Eligible Passenger Tickets (book of 10) - \$30.00
- GO!Bus Eligible Non-Disabled Senior Citizen Tickets (book of 4)

One companion may ride along at the same fare as the qualified passenger. A **Personal Care Attendant** (PCA) may travel with an ADA-eligible passenger at no charge.

Travel training is offered one-on-one for people with disabilities. The travel trainer plans the client's route, rides with him/her during training, and stays in contact with the client to monitor progress.

ADA Eligible Visitor Pass - Staff call other agencies to verify ADA eligibility or ask visitors to send Rapid a copy of their ADA card.

Rapid Senior Mentor Program pairs an experienced volunteer with any senior who would like to feel more comfortable using the bus system. The mentor provides all the information, plans the route to a destination of the client's choosing, and goes with the new bus rider. The mentor also gives the participant a free 10-ride fare card to start his/her bus travels.

UTAH TRANSIT AUTHORITY SALT LAKE CITY, UTAH

Participants:

Utah Transit Authority: Cheryl Beveridge, Special Services General Manager

CUTR: Deborah Sapper and Jay Goodwill

CERTIFICATION APPROACH

In 2000, the Utah Transit Authority (UTA) moved from a paper application to an in-person assessment. In 2003, it began on-site assessments and then went on to community-based assessments. In-person assessment has been tremendously successful for managing demand. When UTA moved from the paper application to the in-person assessment, they saw up to an 84 percent self-elimination rate in some outlying counties. UTA provides transportation only to those eligible based on trip-by-trip eligibility and feeds riders into its fixed-route services for full integration of transportation.

CERTIFICATION PROCESS

Applications are reviewed to determine whether applicants are cognitive or need to be referred. All applicants are called in for an in-person assessment. Rather than an on-property assessment, a community assessment is done. UTA has added an occupational therapist and an O&M specialist for persons with visual disabilities.

During the **interview**, if the interviewer can determine that the applicant has no ability to functionally access fixed-route services, or if it is determined that the applicant is unconditionally eligible, no additional assessment is required, including a physical or functional assessment. A rider who exhibits the ability to functionally access fixed-route would not receive eligibility.

ADA POLICIES AND PROCESS

Denials can be based on mobility aids; common denials are size and weight of wheelchairs and are not based on functional ability.

Conditional eligibility is based on whether stops have curb cuts, sidewalks, or pads and the person's path of travel. These factors determine the person condition of eligibility. From this assessment they can determine which stops they can use.

UTA is moving towards reducing paratransit services to only those areas that fall within **3/4 mile** and are in a six-step implementation process. All new applicants must fall or move to within the 3/4 mile boundary for their origin and destination in order to receive transportation

Applicants who are determined **not eligible** or who do not agree with the conditions established for their use of the paratransit service may file an **appeal** within 60 days of the date the initial eligibility determination was received. UTA has had three appeals in the last year, out of 1,100 assessments.

Suspension points are given for the following types of **no-shows**:

- Same Day Notice (1 pt) is charged to the client’s record if the ride is canceled after 10 pm the day before but before 4 hours before the scheduled ride.
- Late Notice (3 pts) is charged to the record if the ride is canceled between 30 minutes and 4 hours before the scheduled pickup time.
- No Notice/Cancel at Door (5 pts) is charged if the ride is canceled less than 30 minutes before the scheduled pickup time, or the driver is notified when he/she arrives that the client will not be riding, or the client is not present after the vehicle has waited five minutes, but before the driver departs the client arrive to take the ride.

Point Accumulation and Suspension Period Chart

Points	Within	Suspension Period
12	30 Days	1 Week
24	60 Days	2 Weeks
36	90 Days	6-Week Loss of Subscription*
48	120 Days	10-Week Loss of Subscription**

* Optional education meeting will reduce service suspension by 1 week.

** Optional education meeting will reduce service suspension by 2 weeks.

*** If 60+ points are accumulated, service suspension will add 4 more weeks for each additional 12 points over the base 60 points.

ALTERNATIVE MOBILITY OPTIONS

Paratransit eligible passengers can ride fixed-route, light rail, and, in the future, commuter rail for free by showing their paratransit ID card. UTA does not offer **travel training** but has a buddy ride along program to show people how to ride the bus and works with local jurisdictions to make **bus stops** and **paths of travel** to the bus stop accessible when possible.

WINSTON SALEM TRANSIT AUTHORITY WINSTON SALEM, NORTH CAROLINA

Participants:

Winston Salem Transit Authority: Jackie Ijames, Director of Mobility Management; Tekeshia Austin, ADA Coordinator

CUTR: Deborah Sapper and Jay Goodwill

CERTIFICATION APPROACH

Initially, Winston Salem was only looking at the application and taking the word of the physician or person filling out the application. Due to increasing demand, there was a need to tighten up the assessment process. Now, the application process is more intense; the application form that was originally 2 pages is now 41 pages.

CERTIFICATION PROCESS

In 2007, Winston Salem Transit came out with **five different applicant forms**, each tailored to the type of disability: physical disabilities, psychiatric disabilities, cognitive impairment, seizure disorders, and visual impairment.

A physician or certified agency must complete a section of the application. All applicants must come in for an interview. A functional mobility test is given based on walking down the street or uphill, etc.

The ADA coordinator determines eligibility. This process could include additional discussion with the physician. About 10-15 percent of the new applicants are **denied** ADA paratransit eligibility due to that fact that they are not qualified.

ADA POLICIES AND PROCESS

The **recertification process** is done every three years.

Service is provide outside the **3/4 corridor** as long as there is availability.

A client has 60 days to **appeal** a determination or condition of eligibility. All appeals must be in writing. A letter is sent with instructions on how the appeal process works. The ADA coordinator

reviews the appeals and may reverse a determination of ineligibility or revise conditions of eligibility, authorize a specific trip request which had been denied, or assign a date for the Board of Appeals hearing.

The Board renders a decision and directs the ADA coordinator to prepare a letter to the appellant regarding its determinations. The Board will specify, and the letter will explain in detail, the reasons for the maintenance, modification, or reversal of the matter(s) of the appeal.

Upon the occurrence of the **no-show**, the client is sent a notification letter. After a second reported no-show, the information is documented in the client's file and the client receives a telephone call warning that further no-shows will result in suspension. If a rider accumulates three no-shows within any 30-day period, service may be suspended for 30 days.

ALTERNATIVE MOBILITY OPTIONS

When a client is able to access fixed-route buses, **travel training** is provided on how and where to access buses. The training is conducted by the ADA coordinator on an individual basis.

All passengers are encouraged to use fixed-route if possible. Elderly and people with disabilities can use fixed-route for half the regular fare. Encouraging passengers on paratransit to use fixed-route has been difficult since service was free to eligible riders; now the fare is 50 cents without a Medicaid card. Regular fare is \$1.00

New Winston Salem Transit employees receive **sensitivity training and safety training** by the ADA coordinator.

Winston Salem Transit is working with the city on making bus stops and curb cuts accessible.

CHAPTER FIVE

CONCLUSION AND SUMMARY OF BEST PRACTICES

OVERVIEW

Based on information contained in the previous four chapters, it is concluded that no evidence or observations were uncovered that indicate that segments of the disability community are unfairly denied ADA complementary paratransit services or are subject to the loss of mobility due to the new ADA paratransit eligibility procedures implemented by some of the agencies. Additionally, some proactive and compassionate practices instituted concurrently by the transit agencies with their eligibility process changes were discovered. This chapter provides a summary of these practices and policies.

CONCLUSION

Due to the ever-increasing demand for complementary ADA paratransit trips, transit agencies have instituted a number of actions related to reducing the costs of this type of service, including steps to limit the demand through stricter and more complex ADA paratransit eligibility processes.

The disability community has expressed concern over the stricter and more stringent ADA paratransit eligibility determination processes, fearing the loss of mobility for people with disabilities who may find the new procedures cumbersome to comply with or who may be ruled ineligible for the ADA paratransit services.

Although anecdotal reports that the widespread changes to the nation's transit systems ADA paratransit eligibility procedures have negatively impacted some segments of the disability community, there had been minimal research to document the practices being used, the resultant changes of these practices on ridership, the impacts on riders with disabilities who have been denied service, or what other mobility alternatives are available to those individuals.

The objective of this research was to document the changes the transit systems made to their ADA paratransit eligibility procedures and determine what impacts these changes have had on riders with disabilities.

After an extensive literature review, an examination of trends and issues, a survey of national transit agencies, and more extensive follow-up interviews with representative transit systems, it

is the opinion of the researchers that there is no evidence or observations uncovered to indicate that segments of the disability community are unfairly denied ADA complementary paratransit services or are unfairly subject to the loss of mobility due to the new ADA paratransit eligibility procedures implemented by some of the agencies.

A common observation was shared by many survey respondents that may present the appearance of potential loss of mobility options for segments of the disabled community. As the transit agencies made changes to application forms and processes, a significant number of potential applicants and existing eligible clients during the recertification process did not complete the application process. In such cases, the applicants self-selected not to continue by not formally submitting an application. The common consensus among the transit professionals was that this was a result of better information contained in the application packets and outreach efforts that explained the purpose of ADA complementary paratransit service and more detailed information on other mobility options offered by the transit agencies.

The changes to the ADA complementary paratransit eligibility process varied from agency to agency. Changes to the process that were made reflected the maturing of the eligibility process, the sharing of experiences among the transit industry, and guidance and research provided by groups such as Project ACTION.

While budgetary pressures provided a strong incentive for agencies to examine their ADA complementary paratransit services, the transit agencies have approached the challenge in a professional and compassionate manner. Several innovative and comprehensive practices were observed during this research effort that reflected this comprehensive approach to determining ADA paratransit eligibility in an objective manner, providing safeguards through independent assessments and appeal processes. Additionally, transit agencies have made significant strides in improving the accessibility to mainstream transit services, allowing many of the disabled community to access regular transit services. Travel training and financial incentives have become common components to encourage greater utilization of mainstream (i.e., fixed-route) transit services.

SUMMARY OF BEST PRACTICES

This section provides a brief overview of some of the best practices uncovered in the research related to the overall ADA complementary paratransit programs, including the eligibility certification process, program management practices, and promotion of greater accessibility to the main stream transit services.

1. **Improved Application Form** - The ADA complementary paratransit eligibility application form and process have been improved and expanded to better collect and assess information on the mobility needs of the applicants. Such changes included:
 - a. Easier to understand – user friendly
 - b. Focus on functional assessment and not physical condition
 - c. Professional verification
 - d. Specialized forms related to type of disability
2. **Medical Professional Follow-up** - Many of the original application forms did not require the verification of the applicant’s information, or the agency did not follow up with medical professionals in a consistent manner.
3. **In-Person Interviews** - Many transit agencies have incorporated in-person interviews with applicants to provide an assessment of the individual’s functional abilities and proficiencies to use fixed-route transit services. These interviews have proven to be an excellent method to provide information on ADA complementary paratransit services, including what can be expected from the paratransit service and what is expected from the passenger. Information on the other available mobility options is also relayed at these interviews.
4. **Functional Assessments** - Many agencies have begun to evaluate some or all of the applicants through a functional assessment to determine abilities to use fixed-route transit service. While this step adds time and expense to the application process, functional assessments can provide objective criteria upon which to base the ADA paratransit eligibility decision.
5. **Conditional Eligibility Determination** - The increased use of conditional eligibility determination results in some passengers being eligible for some ADA paratransit services but required to use fixed-route services when able. The use of conditional eligibility determinations is still limited due to limited information on the specific conditions of bus stops.
6. **Recertification Process** - As transit agencies have made changes to their application process, they usually require that all existing passengers go through the new process, or recertify. To keep their eligibility roles up to date, transit agencies have implemented policies to recertify all eligible passengers on a periodic basis, usually every three years. During the recertification process, transit agencies may adopt less stringent processes since a passenger history has already been established.

7. **Mix Agency and Contracted Services for the Eligibility Process** - There is no one size fits all approach to ADA complementary paratransit eligibility process. Transit agencies have used a variety of eligibility approaches and use a mix of agency staff or contracted services, or a combination of both.
8. **Minimum ADA Requirements (i.e., 3/4 Mile Service Area)** - One common word of advice shared by transit agencies was to start with the minimum ADA service requirements when first setting up ADA paratransit service. Many agencies that started with more liberal service areas and policies have found it very difficult to reduce their services to what is required.
9. **Focus on Education Throughout the Process** - Expansion of the education components of existing and potential ADA paratransit passengers on other mobility options are usually accomplished in the following areas:
 - a. In the application form
 - b. In promotional materials
 - c. During the in-person interviews
 - d. Detail mobility options (i.e., fixed-route service)
 - e. Travel training opportunities
10. **Use “Common Sense” Into the Process** – A word of advice offered by many transit agencies is not to forget to insert some “common sense” in to the ADA eligibility process. This would include, but not be limited to, the following:
 - a. Approve obvious applicants
 - b. Don’t become too regimented in the process
 - c. Fit the evaluation to the situation
11. **Promote Use of Fixed-Route Services** - The best means to manage the demand and costs for ADA paratransit services is to encourage greater use of fixed-route bus services where and when feasible. Use of fixed-route services provides greater mobility options to ADA paratransit passengers. This can be promoted by the following actions:
 - a. Provide information and trip planning/assistance
 - b. Travel training
 - c. Fare incentives
 - d. Mobility manager positions
 - e. Conditional eligibility
 - f. Driver sensitivity training
 - g. Fixed-route bus stop improvements

12. **Provide Appeal or Grievance Process** - It is essential to ensure that ADA complementary paratransit eligibility determinations are conducted in a fair and objective manner and that an appeal or grievance procedure is offered to any applicant deemed ineligible; this is a Civil Right. To accomplish this, the process must be provided in a timely, straightforward manner and with the inclusion of independent assessors.

13. **Maintain and Practice Good Trip Management Practices, Such As No-Show and Late Cancellation Policies** - A very effective method to manage paratransit costs is to minimize the impacts of no-show passengers and late cancellations. By adopting and implementing effective policies for no-shows and late cancellations, the transit agency can maintain higher productivity and lower per trip costs.

14. **Other Cost Management Practices** - Transit agencies have to effectively and efficiently manage their paratransit programs. An effective ADA paratransit eligibility process is only one of many components that should be used by paratransit managers to manage costs.

APPENDIX
SURVEY OF ADA PARATRANSIT ELIGIBILITY CERTIFICATION

SURVEY OF ADA PARATRANSIT ELIGIBILITY CERTIFICATION

As part of the NCTR project entitled “Impacts of More Rigorous ADA Paratransit Eligibility Assessments on Riders with Disabilities,” we are surveying public transit agencies regarding information on agency policies and practices related to ADA complementary paratransit eligibility processes.

In consideration of your time and busy schedule, the survey is designed to allow simple yes/no and quick responses.

We would appreciate if you or the person in your organization most familiar with your agency’s paratransit eligibility certification policies and practices would complete the survey and return it by email to my attention (sapper@cutr.usf.edu) on or before January 30.

Thank you in advance for your assistance. All of your responses will be kept confidential. All reported data will be a compilation of all responses received and not attributed to any specific system.

AGENCY: _____

PERSON COMPLETING SURVEY:

Name: _____

Title: _____

Telephone Number: _____

E-mail Address: _____

CURRENT YEAR

Number of ADA Paratransit Trips: _____

ADA Budget: _____

ADA Certification: _____

CERTIFICATION PROCESS

Has your agency made any changes to your ADA Paratransit Eligibility Certification Process in the past five years? Yes No

If yes, please provide further detail: _____

Reason for the change: _____

Type of changes: _____

Has your application form changed due to the changes in your Eligibility Certification Process?

Yes No

If yes, please provide further detail: _____

Has the number of applications for ADA Paratransit Eligibility changed due to the changes made to the certification process? Yes No

If yes, have they:

Increased

Stayed the same

Decreased a little

Significantly decreased

Does your agency recertify your ADA paratransit passengers on a regularly scheduled basis?

Yes No

If yes, how often do you recertify?

Annually

Bi-annually

Every 3 years

Other: Please provide details: _____

Does your agency perform physical assessments for ADA paratransit applicants?

Yes No

If yes, what percent of the applicants must undergo the assessment? _____%

Provide further details if applicable: _____

Are you approving fewer people? _____ Yes _____ No

Provide further details if applicable: _____

CONDITIONAL ELIGIBILITY

Does your agency allow conditional eligible trips? _____ Yes _____ No

If yes, what is conditional eligibility based on?

_____ Environmental conditions and architectural barriers

_____ Physical assessment of the passenger

_____ Travel training

_____ Other: Please provide details: _____

Does your agency allow eligible riders who become ineligible due to route improvements, facility makeovers for accessibility, or accessible vehicles to continue to ride as eligible passengers?

_____ Yes _____ No

TRAVEL TRAINING AND USE OF FIX ROUTE SYSTEM

Does your system provide any free or subsidized passes to your paratransit passengers to encourage their use of your fixed-route system? _____ Yes _____ No

If yes, please provide further detail: _____

Does your system provide any travel training to your paratransit passengers to encourage their use of your fixed-route system? _____ Yes _____ No

If yes, please provide further detail: _____

Does your system make efforts to improve the accessibility of fixed-route bus stops to encourage greater use by paratransit passengers? _____ Yes _____ No

If yes, please provide further detail: _____

OTHER CHANGES

Does your agency charge a supplemental fare for service beyond ¾ mile?

_____ Yes _____ No

If yes, please provide further detail: _____

Does your agency offer Same-Day Taxi Subsidy?

_____ Yes _____ No

If yes, please provide further detail: _____

Has your agency implemented any other programs that reduce the ADA paratransit cost?

_____ Yes _____ No

If yes, please provide further detail: _____

THANK YOU FOR TAKING THE TIME TO HELP US WITH THIS PROJECT!

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