



# ICTC ADA Certification



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# ICTC ADA Certification

## Final Report

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## Introduction and Executive Summary

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Imperial County Transportation Commission (ICTC) contracted with the team of LSC Transportation Consultants, Inc., AECOM, and KFH Group to evaluate the current process for determining eligibility to use IVT Access and recommend improvements to the process if appropriate.

IVT Access is the complementary paratransit service provided by ICTC in the IVT service area as required under the Americans with Disabilities Act (ADA). The ADA requires that operators of public fixed-route transit provide a complementary paratransit service for those individuals who are unable to use the fixed-route service. The service must be provided in areas within three-quarters of a mile of the fixed routes, operate during comparable hours, and provide origin to destination service. There are other specific requirements which must be met regarding scheduling and fares. The law specifies minimum requirements, but does not preclude agencies from operating services above and beyond the minimum requirements. Transit agencies are required to establish a certification process to determine eligibility. That process for ICTC and IVT Access is the subject of this study.

Overall categories of eligibility for paratransit services are defined in the ADA. Three overarching categories were defined in the Act:

- Category 1 includes “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.” [37.123(e)(1)] These people cannot use the bus at any time even if it is accessible.

- 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.” [37.123(e)(2)] These people could get to and use the bus if it was accessible.
- Category 3 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.” [37.123(e)(3)] These are people who could use the bus but cannot get there due to such issues as inadequate sidewalks, curb cuts, terrain, snow, or extreme heat.

Additionally, the ADA sets out the category of temporary disability [37.123(c)] and the ADA also recognizes that certain trips may be eligible for complementary paratransit service but other trips may not be [37.123 (b)]. Addressing this latter stipulation requires the use of conditional or trip-by-trip eligibility where some trips might be eligible for ADA paratransit and others not, depending upon the environmental conditions or availability of an accessible bus for each specific trip.

The definitions, while stated clearly, leave many areas where judgment is required on the part of an agency during the certification process. For example, for Category 3, is the individual actually prevented from accessing a bus stop or is the trip simply very difficult, and to what extent does that parallel the difficulties of an able-bodied person?

From the ADA Paratransit Eligibility Manual:

*If an impairment-related condition only makes the job of accessing transit more difficult than it might otherwise be, but does not prevent the travel, then the person is not eligible.*

A significant challenge is to determine when the degree of difficulty becomes an impossibility, or near enough to one that the individual should be granted certification.

For example, in the case of Category 1, when is blindness or mental disability a barrier such that the individual cannot “navigate the system?” How does one determine if a person can or cannot stand on a crowded bus and for how long, especially if the disability is “hidden” as it might be for a heart condition, severe asthma, or other conditions? Can an individual learn to navigate the system through travel training or with operator assistance (assuming it can be given by the agency)?

Category 2 may be the clearest—if an accessible bus is on the route and the individual can access the stop, then the individual is not ADA-eligible. If there is no accessible service, the individual is eligible.

Setting up an Eligibility and Certification process therefore requires that an agency not just consider the presence of the disability, but its effect on the person’s ability to use the fixed-route bus service. Therefore, the conditions have to be taken into account with the accessibility of the system in mind, the architectural barriers such as sidewalks leading to bus stops to access the system, and environmental conditions. The process has to be able to provide enough information to make these determinations, as solely identifying some type of disability is not necessarily enough to determine eligibility.

Agencies have taken basically four approaches to the determination of eligibility and certification process. All require completion of a detailed application, but they vary in detail and complexity:

- **Self-certification with professional verification only if needed:** A large number of agencies took this path when the ADA was first enacted, in part to maintain service for the existing populations using paratransit services; second, because it was easy to transition from existing services; and third, because they underestimated the impact of the ADA on

ridership. This path has become increasingly rare as the cost of operating ADA services has skyrocketed with demand, forcing the agencies to tighten up their certifications to stay closer to the rules.

- **Self-certification with professional verification in all cases:** This path is one step beyond the above process, requiring that the applicant have a medical professional or other suitably trained individual sign-off on the individual's disabilities as well as abilities that interfere with making a trip by transit. This is the current process used by ICTC. In many cases the medical professional is the individual's own doctor, which has been found to lead to their being too lenient. To combat that, some agencies have the reviews conducted by trained staff either at the agency or from a third-party provider, making the process more objective.
- **In-person assessment:** Some agencies go one step further in that they use professional verifications, but also do in-person interviews with the applicant as a follow-up using an in-house trained staff person or a qualified third-party provider.
- **Functional assessment:** As the ADA has evolved and more and more agencies are realizing they need to tighten up their procedures in all areas, they have gone increasingly to a "functional assessment" process that follows up on the application and professional sign-off with a 45 to 60-minute test of an individual's skills relevant to trip making.

The objectives in the study were to determine if the eligibility certification process for IVT Access could be improved and the potential impacts of any changes while maintaining full compliance with the ADA and improving the service provided to users.

## STUDY PROCESS

The study began with Case Studies of seven other transit systems and the process used to determine eligibility for their complementary paratransit service. The systems selected for the Case Studies were chosen to provide a range of different approaches and to have some systems similar in size to IVT.



Interviews were conducted with each of the systems to determine the process used, benefits or shortcomings of the process, and costs to implement the process. The Case Studies are described in Chapter II.

Chapter III describes the evaluation of the current process used by ICTC and a description of the IVT Access paratransit service. The current certification process relies on verification by a healthcare professional. The evaluation found that little or no information is provided to the healthcare professional about the purpose of IVT Access or the eligibility requirements. Very few, if any, individuals are denied eligibility through the current process.

Community input was sought at key points during the study. This effort is described in Chapter IV. The outreach effort included “ride-along” interviews in IVT Access and community meetings. Key findings from the community input included an understanding of the need for some type of assessment and the need for the certification process to be open and unbiased. Outreach to users did not find strong resistance to possible changes in the certification process as long as it is easy to apply, persons who need the service are determined to be eligible, and the process appears to be equitable and fair.

A range of options for the certification process was evaluated and is described in Chapter V. These included different approaches to interviews and functional assessments. The staffing requirements, costs, and benefits of each option were compared to develop the recommendations provided in Chapter VI. The comparison of the various options and preliminary recommendations were presented to users and the community for feedback and input prior to developing the final recommendations provided in this report.

## **RECOMMENDATIONS**

Recommendations are provided in Chapter VII. The specific recommendations for changes to the certification process include:

- Update the IVT Access website to reflect the new certification process. Changes include a better description of IVT Access and eligibility requirements. A self-assessment checklist is suggested to help potential

applicants determine if they may or may not be eligible. This is a low cost option with a potential for a small decrease in the number of applications.

- Require applicants to complete an initial telephone call to request application materials. As part of the call, the applicants will be given information to help them determine if they may be eligible for IVT Access. This option will require a small amount of staff time for the interviews, but no additional staffing or cost should be required.
- Update application forms and information brochures to reflect the new process. This is a one-time low cost action. Suggested changes to the application forms are included in Appendix D.
- Require in-person interviews of all applicants. This interview will provide an opportunity to assess the applicant's abilities and need for paratransit service. It is also an opportunity to encourage the applicant to consider travel training and possible use of IVT fixed-route service. This action has the largest cost to implement. Over the past year, applications averaged about 23 per month. The estimated staff time would be about 12 hours per month at an estimated cost of \$7,200 per year. This action will require additional staffing to conduct the interviews. Transportation to and from the interviews could cost as much as \$10,500 per year. Based on experience at other transit agencies, it is estimated that about 25 to 30 percent of applicants required to have an interview will self-select out of the process, resulting in fewer certified individuals. Of those who do complete the application process, two to eight percent may be found to be ineligible for IVT Access, again based on experience at other transit agencies. Others may be encouraged to use fixed-route transit as an option when it is available and accessible. The benefit of these actions is a projected reduction in the growth of paratransit users by about 10 percent with a corresponding reduction in annual operating costs.
- Recertification will be required of all certified individuals. Recertification will help to keep eligibility database information current and ensure that

certified individuals still require paratransit service. This action will require some staff time, but no additional staffing is anticipated.

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# Eligibility and Certification Case Studies

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## INTRODUCTION

This Chapter presents the Case Studies of the processes used by seven other transit agencies. The use of Case Studies was included to identify best practices for eligibility determination and identify possible strategies to be used by ICTC.

## SELECTION OF SYSTEMS

Seven agencies were selected to serve as case studies. These agencies were selected to provide a range of processes used and are not necessarily similar to Imperial County, ICTC, or IVT Access. The processes include approaches such as use of third-party contractors to determine eligibility and use of an assessment center to conduct functional assessments as part of the eligibility determination process. The systems also vary widely in size from systems similar in size to ICTC to systems which are much larger. The following seven agencies were selected as case studies:

- Orange County Transportation Authority (OCTA), Orange County, CA
- Greensboro Transit Authority (GTA), Greensboro, NC
- Corpus Christi Regional Transportation Authority (CCRTA), Corpus Christi, TX
- Valley Transit, Appleton, WI
- Regional Transit System (RTS), Gainesville, FL
- Monterey-Salinas Transit (MST), Monterey, CA
- Regional Transportation Commission of Washoe County (RTC), Reno, NV

## CASE STUDY FINDINGS

Key findings from each of the systems are discussed in this section. A brief description of the transit system is included, but the focus is on the process used to determine eligibility for use of the ADA paratransit service and to certify the individuals to use that service. Table 1 provides a brief summary of the process for each of the agencies.

Initial information was obtained from websites for each transit agency. This information was then verified through interviews. Additional questions were asked as part of the interview process. The interview questions which were used are included in Appendix A.



<div>Table II-1</div> <div>Case Study Findings - Summary</div>						
Transit Agency	Components of Process	Healthcare Professional Verification of Disability?	In-Person Interview?	Functional Assessment?	Conditional Eligibility	Recertification
Orange County Transportation Authority (OCTA), Orange County, CA	Applicant completes application, contacts OCTA to schedule required in-person assessment, and takes completed application and photo ID along to undergo functional assessment, conducted by a private company under contract. Final decision on eligibility made by OCTA.	No	Brief interview before functional assessment. Applicant watches special video about accessible trans- portation while waiting for assessment.	Yes, required for all applicants. Conducted by staff of private company under contract (Care Evaluators). Assessments take place in sophisticated, purpose-built assess- ment center, outfitted with actual OCTA fixed- route bus and props to evaluate transit skills.	Conditions may be applied to riders’ eligibility; however, riders are on the “honor system” to abide by any conditions.	Required after 5 years.
Greensboro Transit Authority (GTA), Greensboro, NC	Applicant completes applica- tion, obtains healthcare verification, and then con- tacts agency for required in- person appointment. Completed application is brought to appointment or submitted ahead of time.	Yes	GTA staff interviews applicant before assessment, providing information on available services including accessible fixed-route service.	For applicants with physical disabilities, GTA staff assesses basic transit skills using props built by in-house staff (e.g., curb cut, bus steps). Testing of cognitive transit skills not currently being done.	Conditions determined during certification process but not implemented in daily operations through trip-by-trip screening.	Required after 3 years.
Corpus Christi Regional Transportation Authority (CCRTA), Corpus Christi, TX	Applicant completes applica- tion, obtains healthcare verification, and sends or delivers the applications materials to CCRTA. Agency staff then contacts the applicant to schedule the required in-person interview, which may also include a functional assessment.	Yes	Yes. Applicants are interviewed by the occupational therapist or students of a local college’s occupa- tional therapy program, which in part determines whether and/or which type of functional assess- ment is conducted.	Depending on the interview, applicant has a functional assessment. These are conducted either by students at local college’s occupa- tional therapy program under supervision of the occupational therapist or by the occupational therapist.	Conditions may be applied during certifi- cation, but trips are not scheduled accord- ing to the conditions. Riders are asked to honor their conditions.	Required after 3 years.
Valley Transit, Appleton, WI	Applicant completes application and makes appointment for interview.	Yes	Yes. Applicants are interviewed by con- tracted occupational therapist. Eligibility is determined based on the interview.	No	Conditions may be applied based on inter- view. Conditions are entered into passenger profile and screened at time of reservation request.	No
Regional Transit System (RTS) – Gainesville, FL	Applicant or their doctor obtains Professional Verifica- tion Form (PVF) and contacts the Center for Independent Living (CIL) for an in-person appointment. Completed PVF (requires professional health care provider) is brought to appointment, submitted ahead of time, or submitted after the appointment. Photo ID also required.	Yes	Yes – they contract with the CIL for an in-person interview.	No	Conditions determined during certification process, but not implemented in daily operations through trip-by-trip screening.	Required after 3 years for most disabilities; some long-term condi- tions are allowed a 5-year renewal cycle.
Monterey-Salinas Transit (MST) – Monterey, CA	Applicant completes Contact Information Form, obtains Professional Verification Form, submits these and is then contacted by the agency for in-person appointment.	Yes	Yes; MST staff inter- views the applicant, and depending on the disability, the travel training staff also assesses the applicant’s ability to use a fixed-route bus.	The travel training staff also assesses the applicant’s ability to use a fixed-route bus.	Yes	Yes, but they do grant “lifetime” certification for certain dis- abilities.
Regional Trans- portation Com- mission of Washoe County (RTC) – Reno, NV	Applicant completes Applica- tion Packet, has healthcare provider complete Pro- fessional Healthcare Verifi- cation Form, and then con- tacts agency for in-person appointment. Completed application is brought to appointment or submitted ahead of time.	Yes	Yes	Yes (need to verify) – It appears that depending on the disability they do physical and cognitive assessments.	Conditions are deter- mined during the certification process; includes “Feeder Service Only” riders.	Required after 3 years.

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## Orange County Transportation Authority (OCTA), Orange County, California

OCTA provides public transit services in Orange County, an area of 800 square miles in southern California. The agency operates 550+ fixed-route buses over 77 routes and contracts for ADA paratransit, known as ACCESS, using a dedicated fleet of 250 vehicles. The dedicated service is supplemented by non-dedicated service (including taxis).



The agency has taken a number of steps over recent years to address the growth and demand for ADA paratransit. In 2005, the agency implemented significant changes:

- Reduced the ADA paratransit service area to the required three-quarter-mile corridors of fixed routes.
- Expanded the on-time pick-up window from 20 to 30 minutes.
- Introduced a same-day taxi program.
- Revised certain policies, including elimination of the same-day medical back-up service.
- Implemented 100 percent in-person eligibility assessments for applicants.

More recent steps have included the design and construction of a purpose-built eligibility certification center, where applicants are evaluated to determine ADA paratransit eligibility.

### Eligibility/Certification Process

OCTA's original process was a paper-only application process. This evolved to a partial in-person process, with 17 percent of applicants receiving the in-person assessment.

Beginning in 2005, all applicants have been required to have an in-person assessment. OCTA's early experience with 100 percent in-person assessment requirement found that about 20 percent of applicants did not follow through with the assessment after completing an application.

The current process continues the requirement for all applicants to have an in-person assessment. Applicants schedule an appointment for an assessment and then bring their completed application form and photo ID card to their assessment appointment.

OCTA has contracted with Care Evaluators, Inc. to conduct the assessments. The contract with Care Evaluators, with a three-year term, began in 2011 and has the option for two one-year extensions. The contractor charges \$81.51 for each completed in-person functional assessment. The total contract value for CARE Evaluators for FY2012-2013 was \$440,000.

In 2012, OCTA unveiled a large facility designed to perform the functional assessments.<sup>1</sup> The indoor facility is equipped with a full-size fixed-route bus, sidewalks, wheelchair-accessible curbs, a crosswalk, and operating traffic signals to fully replicate a bus stop. Applicants are assessed on their ability to board and exit the bus, navigate through the center aisle of the bus, use the farebox, and on the length of time to cross the facility's simulated street. This assessment can usually be completed in 30-60 minutes. However, with time needed to review the application at the outset and travel to and from the facility location via ACCESS's shared ride service, the process may take from four to six hours for the applicant.

As of early 2014, about 525 people are certified/recertified each month. Certification outcomes for the recent five-year period are shown in Table 2. OCTA staff report that the low denial rate is because many applicants do not complete the process once they learn about the second step—that is, the comprehensive in-person functional assessment. The agency reports that approximately one-third of applicants do not complete the process, essentially self-determining that they do not qualify for ADA paratransit. The “word is out” in the community that the transit agency has a sophisticated process to assess functional mobility related to public transit.

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<sup>1</sup> This indoor facility was built as part of OCTA's contract with CARE Evaluators for \$53,000, according to OCTA's *ACCESS Service—2012-2013 Orange County Grand Jury Study of ACCESS*, 2013, pg.4.

<p style="text-align: center;"><b>Table II-2</b> <b>ACCESS Eligibility Certification Outcomes, FY2009-2012</b></p>					
	<b>FY2007-08</b>	<b>FY2008-09</b>	<b>FY2009-10</b>	<b>FY2010-11</b>	<b>FY2011-12</b>
No. of	6,289	6,839	6,394	6,336	5,749
Approvals	6,035	6,640	6,278	6,196	5,624
Denials	254	199	116	140	125
% Denial Rate	4.0%	2.9%	1.8%	2.2%	2.2%
<p><i>Source: OCTA's ACCESS Service—Summary of 2012-2013 Orange County Grand Jury Study of ACCESS, 2013, pg. 5.</i></p>					

As of FY2013, there are approximately 60,000 persons certified as eligible, with about 26,000 defined as active users (taking at least two one-way trips/year).

For applicants with limited or no English language skills, OCTA provides bilingual materials and ensures there are staff members at both the agency and eligibility contractor who are bilingual. At least three of the eligibility contractor's personnel are bilingual.

For applicants not able to read the application materials, OCTA encourages those individuals to bring a family member or someone from a human service agency with them to the assessment to help understand and navigate the eligibility certification process.

### Strategies to Address ADA Paratransit Demand and to Enable/Encourage Fixed-Route Service Use

#### **Advance Reservation Time Period**

OCTA revised a one-to-seven day advance reservation policy to a one-to-three day advance policy several years ago. The agency reports that initially some riders and members of the community did not understand the change—misinterpreting the policy to require that trips would have to be reserved three days in advance. It apparently took about six months after the policy change for riders to fully understand the revision and gain confidence that they could reserve desired trips the day before and be guaranteed those trips.

OCTA reports that no-shows and cancellations were reduced with the advance reservation policy change.

## Mobility Training

OCTA has provided group and individual one-on-one mobility training as well as train-the-trainer training for community organizations to encourage and support the use of accessible fixed-route service by people with disabilities.

Currently, the training is not provided in-house but rather through the Dayle McIntosh Center in Orange County, an independent living center offering a wide range of services. Individuals who would benefit from travel training are identified in the eligibility certification process and then referred to the Dayle McIntosh Center. OCTA would like to bring the training back in-house and has included funding in the current budget to do so.

Prior mobility training has been evaluated, with surveys and follow-up with those who completed the training. Data for FY2008 show that OCTA had 677 participants in their various mobility training efforts; this increased to 812 participants in FY2009. Data on fixed-route service use by those who completed mobility training were also collected as shown in Table 3.

<b>Table II-3 Fixed-Route Boardings by Riders with Disabilities Who Completed Mobility Training</b>	
FY2008	80,774
FY2009	123,322
FY2010	141,421

For trips provided on the agency's fixed-route service that otherwise would have been provided by its ADA paratransit program, OCTA defers significant costs. For FY2010, the mobility training participants' travel on fixed-route service deferred \$4.8 million (FY2010 ADA paratransit cost was \$34.34 per trip), assuming the trips would otherwise be provided by ADA paratransit.

## Senior Mobility Program

OCTA's Senior Mobility Program, formally implemented in 2001, offers funds and retired paratransit vehicles to cities and nonprofit organizations in the county to design and operate a local transportation service for senior citizens. The resulting local services provide alternatives to OCTA's fixed-route and ADA

paratransit service, ACCESS. The program built upon pilot programs and a finding from a senior transportation study that seniors in the county prefer locally offered transportation service.

Currently, 30 cities and four nonprofit agencies in the county participate in the Senior Mobility Program. Funding for the program comes from both county sales tax revenues and the participating cities. Many of the trips provided by the participating cities are likely eligible for ADA paratransit, but instead are provided locally and more cost-effectively. OCTA staff has estimated that about 25 percent of such trips are taken by ADA-eligible riders, thus addressing the demand for ADA paratransit.

### Lessons Learned

OCTA eligibility staff noted the following when asked about their experience with ADA paratransit eligibility certification:

- With a paper-only application process, the agency found applications were received for individuals without their knowledge: reportedly, human agency staff or others working with individuals with disabilities would sometimes submit ADA paratransit applications on behalf of the individual but without informing the individual. Including an in-person component solves this issue.
- Conducting assessments in a community environment, as opposed to a medical or hospital environment facilitates a more accurate evaluation. Staff experience in other cities found that applicants were tenser and tended to amplify their disabilities when assessed in a medical environment.
- The in-person component allows the transit agency to explain the various transportation options, particularly accessible fixed-route service. OCTA has produced a short video that applicants watch when waiting at the assessment center for their appointment. This video shows a person who uses a wheelchair using both accessible fixed-route service and ACCESS. One of the messages of the video is the greater travel independence that fixed-route transit provides. Another message is that a person with a disability can be certified to use ACCESS, but can also use fixed-route service without jeopardizing eligibility for the ADA paratransit service.
- A comprehensive process—with an in-person assessment—helps ensure that those individuals who meet the ADA definition are the ones certified as eligible. Without a comprehensive process, individuals will be certified who do not meet the strict ADA definition of ADA paratransit-eligible.

## **Greensboro Transit Agency (GTA), Greensboro, North Carolina**

GTA, a division of the City of Greensboro, provides public transit within the city, an area of 131 square miles. Fixed-route service is provided with a fleet of 45 buses operating 16 routes with an additional five routes serving the seven local colleges and universities.

GTA's ADA paratransit service—SCAT—has 38 vehicles and provided 224,654 passenger-trips in FY2012.

### **Eligibility/Certification Process**

Until 2011, GTA used only a paper application with healthcare professional verification to determine ADA paratransit eligibility. Data from 2008 and 2009 showed that GTA received approximately 42 applications per month (two-thirds from new applicants; one-third from recertifying riders). From 10-15 percent of new applicants were denied eligibility, frequently because they did not understand the eligibility criteria for ADA paratransit. As of 2009, GTA had approximately 1,400 individuals certified as ADA-paratransit-eligible with about 700-750 of those being active riders.

GTA now requires that all applicants have an in-person interview and assessment, after completing an application and obtaining healthcare professional verification of disability. Applicants call to schedule the in-person component and either take the completed application material with them or fax it ahead of the in-person appointment. This change was implemented once GTA administrative offices moved into a new facility, with space designed for functional assessments.

Currently, the transit agency receives about 30 applications each month, which is fewer than received prior to introduction of in-person assessments. Of applications received, about 60 percent are from new applicants and 40 percent from those recertifying. Reportedly, some of those recertifying question the need for the in-person assessment.

Presently, there are a total of 1,700 certified riders, with about half (800-825) considered active riders.



A GTA staff member who has attended several training sessions—including the Comprehensive ADA Paratransit Eligibility course offered by the National Transit Institute—conducts the interview and assessment. The assessment uses a number of props, constructed in-house, to help evaluate applicants' physical functional mobility, following guidance in Project Action's report, "Determining ADA Paratransit Eligibility: An Approach, Guidance, and Training Materials." The props include a mock-up of bus steps, curb cut, lift platform, farebox, and a simulated crosswalk with a functioning stoplight. Assessment of applicants with cognitive disabilities relies on the interview and application materials.

While the ADA allows 21 days for processing and providing eligibility determinations, GTA provides most decisions on the same day as the assessment. If there is a need to request additional information, the decision will take longer. While this typically does not happen often, if and when it does, the 21-day process stops until the additional information is received. Once the information is received, the 21-day process begins again.

The denial rate is considerably lower compared to the previous process. It appears that some applicants have determined that they would not be determined eligible with the new process that requires an in-person assessment and have self-selected out of the process. See the attached informational brochure that GTA provides to applicants to inform them of the in-person assessment.

### Strategies to Address ADA Paratransit Demand and to Enable/Encourage Fixed-Route Service Use

#### Travel Training

GTA provides travel training, with referrals from the certification process as well as from the local office of the state's Vocational Rehabilitation Services Division. A small number of individuals are trained annually, with most referrals from the Vocational Rehab Services.

#### Lessons Learned

GTA has found the following with the change from a paper-only application process to one requiring an in-person assessment:

- GTA notes several advantages of the current process over the prior process. With the opportunity to meet the applicants one-on-one, staff members are able to ask in-depth questions about the applicant's mobility issues and to discuss transportation options, in particular accessible fixed-route service. It was reported that few applicants know that the fixed-route vehicles are accessible. Travel training can also be offered and explained as well as conditional eligibility when this is appropriate. Thus, the interview serves an important education function.
- The in-person component allows a more accurate and in-depth assessment of applicants' functional mobility. The agency staff can discuss each applicant's transportation issues and assess basic skills with the functional assessment. This was not possible with the prior process.

### **Corpus Christi Regional Transit Authority (CCRTA), Corpus Christi, Texas**

CCRTA provides fixed-route services, including local and express bus routes, limited-stop circulators/shuttles, and seasonal bus and ferry service, as well as ADA paratransit for Corpus Christi and surrounding communities in Nueces and San Patricio Counties, a service area of 830 square miles. The ADA



paratransit service, known as B-Line Paratransit, provides service within the required three-quarter-mile corridors as well as beyond.

The fare for ADA paratransit is \$1.25 per trip, which is less than allowed with a fixed-route fare of \$0.75. For trips beyond the required three-quarter-mile corridors, there is a \$2.00 surcharge.

#### **Eligibility/Certification Process**

Prior to 2006, CCRTA used a paper application along with medical professional verification of disability. There was no in-person component.

Applicants for CCRTA's ADA paratransit service are to complete an application, obtain verification of disability from their healthcare provider most familiar with their disability, and then send the completed materials to the transit agency. Once the materials are received, the CCRTA staff contacts the applicant to schedule the required in-person interview and assessment. The requirement for the in-person component was implemented in 2006.

The in-person functional assessments are conducted in cooperation with a local community college's occupational therapy program. For part of the year as part of their training, students in the occupational therapy program conduct the functional assessments of ADA paratransit applicants, under the supervision of a licensed occupational therapist and with assistance from a CCRTA staff member. During the other part of the year, CCRTA contracts with the occupational therapist (OT) to conduct the functional assessment two to three times each month. The transit agency also has a contract for a second OT whom the agency uses in the event of an eligibility appeal.

CCRTA does not pay for the students' assessments; it does pay for the services of the occupational therapist, at \$50 per hour, and for the therapist's assistance, at \$25 per hour. Costs for the contracted occupational therapist services vary month-to-month, depending predominantly on the degree of student involvement. Over the past year, monthly costs with predominant use of the licensed OT services have ranged from \$500 to \$1,000.

The functional assessments incorporate both physical and cognitive tests, provided to applicants as appropriate to their disability. The physical test incorporates guidance provided by Project Action. The cognitive test assesses, for example, questions and judgment related to community travel, money skills, and understanding time. The FACTS test is not currently used.

For the physical test, CCRTA has designated an assessment "course" around the agency's administrative building, which includes components of taking a bus trip such as negotiating curbs and curb ramps, traveling over grassy and uneven terrain, and boarding and alighting a parked fixed-route bus dedicated to the assessment function. The agency can also use a large room inside its administration building for assessments, with adjacent side rooms. This is where the preliminary interview takes place, and, for ambulatory applicants, a test of basic mobility skills using the "timed up and go" or "TUG" test. (This assesses an individual's balance, gait, and walking skills by observing and timing the individual taking a seat in chair, walking a short distance, and returning to sit in the chair.) A full assessment is then conducted, as appropriate.

Results of the functional assessment are documented by the OT students or OT, depending on who conducts the assessment, with final eligibility determinations made by the CCRTA eligibility review committee, made up of three staff members including both the eligibility specialist and travel trainer.

Eligibility determinations for 2013 are shown in Table 4. It is noted that conditional eligibility is not operationalized on a day-to-day basis. Riders are asked to honor their conditions and use ADA paratransit only when their conditions apply.

<b>Table II-4 CCRTA Eligibility Determinations, 2013</b>	
<b>Eligibility Category</b>	<b>Percentage</b>
Unconditionally Eligible	75%
Conditionally Eligible	19%
Temporary Eligibility	4%
Denied	2%

It is noted that CCRTA provides presumptive eligibility to applicants once they have their in-person assessment and until a decision is made within the 21-day time period. While the agency's low denial rate (because of their comprehensive certification process) results in few individuals who receive presumptive eligibility and are then denied eligibility, this is not a common practice among transit agencies and potentially can cause issues when an applicant is no longer able to use the service after three weeks of use.

CCRTA noted that the eligibility specialist is fluent in Spanish, thus she can translate for any applicant that does not speak English or does not speak it well. Additionally, the contracted OT speaks enough Spanish to conduct and/or supervise the functional assessments.

The transit agency provides the ADA paratransit ride guide in Spanish and will be translating the application materials into Spanish. Until the application form is translated, the eligibility specialist will complete the applicant's part of the application over the phone for any applicant who cannot read the current printed materials.

No issues were noted regarding notification to the community about the certification process and required in-person assessment. While the current eligibility specialist was not in her position in 2006 when the process was revised, she had another position at the transit agency and indicated that the outreach at that time included contact and interaction with the various community organizations that work with seniors and people with disabilities.

CCRTA reports that the agency received fewer applications for ADA paratransit for several years following the change to the current process. In more recent years, the number of applications received has been growing. As of 2013, the agency receives an average 38 applications per month, or 451 total for 2013.

While the number of applications received may be increasing, the total number of registered riders has actually decreased since the change. In 2005, CCRTA reported a total of 2,535 total ADA paratransit registrants; in 2007, the first year after the change, the total decreased to 1,798. For the most recent year (2013), there are 2,108 registrants, greater than 2007 but still fewer than in 2005.

### Strategies to Address ADA Paratransit Demand and to Enable/Encourage Fixed-Route Service Use

#### Travel Training

CCRTA provides travel training for both groups and individuals. The transit agency's website includes a link to a full explanation of its travel training program, explaining the different types of training offered:

- Travel training for older adults.
- Travel training for persons with disabilities.
- Train-the-trainer training.

There is no charge for the training, and individuals who participate receive a one-month bus pass at no cost when they start the program.

Beginning in 2012, the agency has a full-time travel trainer (known as the mobility coordinator).

It is reported that the travel trainer has accompanied and observed a number of functional assessments as they are conducted. This practice of cross-fertilization of transit agency functions and staff involved with ADA paratransit is considered a good practice.

CCRTA has developed a travel training guide, which is shared with other agencies in the community, such as the local center for those with hearing disabilities.

### Fare Incentives to Use Fixed-Route Service

ADA-eligible individuals receive a fare discount if they ride CCRTA fixed-route service, with a per-trip fare of \$0.25 during peak hours and \$0.10 during off-peak, significantly less than the regular undiscounted fare of \$0.75.

Additionally, ADA-eligible riders may travel on fixed-route service with a Personal Care Attendant (PCA) who travels for free. The ability to have one's PCA travel for free on fixed-route service may encourage riders eligible for ADA paratransit and able to use accessible fixed-route service to take some of their trips on the fixed-route system.

### Lessons Learned

Based on CCRTA's experience with ADA paratransit eligibility certification, several lessons were noted:

- With a certification process that now includes an in-person component, the transit agency sees inconsistencies between information on the application materials and with observations and applicant input during the assessment. This suggests that a paper-only application process does not always provide accurate information. Sometimes the inconsistencies are significant. For example, one application's healthcare information stated that the applicant always traveled with a wheelchair; however, during the in-person assessment, the applicant stated use of a wheelchair only very infrequently. In another example, the application material indicated only one disability, which—on its face—might have indicated ineligibility for ADA paratransit service; however, during the in-person assessment, it was clear the applicant had multiple disabilities that together suggested eligibility. Inclusion of an in-person component results in a more accurate evaluation of an applicant's functional mobility.
- The in-person component of the eligibility certification process serves an important education purpose. The opportunity to meet with and talk to

the applicant allows the transit agency to explain, importantly, accessible fixed-route service. According to CCRTA, most applicants do not know that the city buses are low-floor, greatly easing boarding and alighting for riders with disabilities.

### **Valley Transit, Appleton, Wisconsin**

Valley Transit is operated by the City of Appleton, Wisconsin and provides fixed-route transit throughout Appleton and to several surrounding communities. The total service area is approximately 1,400 square miles with a population of about 250,000.

Complementary paratransit service is provided by Valley Transit II which is operated by a contractor. Valley Transit II serves both elderly passengers and those who are certified as eligible for complementary paratransit service because of a disability. Service is provided at two levels. The basic service is door-to-door, and premium service is when the driver must leave the vehicle for a substantial amount of time, the vehicle is out of sight of the driver, or assistance is requested beyond the first door. Service for elderly passengers who are not certified as eligible for complementary paratransit service is more restrictive than the service for those with a disability. The hours of service and areas of service are less. Complementary paratransit service is provided throughout the service area within three-quarters of a mile of the fixed-route service. The fare for the basic service is \$3.60 one way and the fare for premium service is \$6.00. The fare for Sunday service is \$11.00. Fixed-route service is not provided on Sunday, but paratransit service is provided for those who have been certified as eligible for the complementary paratransit service. Trip requests may be made from the prior day up to 14 days in advance.



## Eligibility/Certification Process

The current process has been used for about 15 years. Prior to that time, certification was completed by volunteers and there was virtually no denial of eligibility. Anyone who requested to be eligible was certified.

The process was changed by using a contractor to perform all eligibility determination. The process is conducted by an occupational therapist at Affinity Occupational Health. Only one person is involved in the process. Applicants complete a request for certification form which is available on the Valley Transit website. The applicants set up an appointment for a personal interview and bring the completed application with them to the interview. No verification by medical personnel is required prior to the interview. During the interview, the occupational therapist makes a determination of eligibility based on observation and questions asked during the interview. If the inability to use fixed-route buses is not clear, the occupational therapist may request verification of the disability from a healthcare provider. Typically, the eligibility determination is made at the time of the interview and the applicant receives the certification card at that time.

Many of the certification interviews are conducted at nursing homes. The contractor occupational therapists visit nursing homes one day a week to conduct the interviews. Nursing home staff provide individuals with the application form and assist in completing the form if needed. The interview is conducted at the nursing home and the eligibility determination is made during the interview unless there is a question of eligibility and verification from a healthcare provider is requested.

The process typically takes two to three days to complete the certification after a person requests an appointment for an interview. The cost is currently \$19 per interview with about 150 interviews completed each month or an annual cost of about \$34,000 per year.

There are no issues with limited English proficiency. They have translated the application form and will provide a translator if one is requested. They do not have a large number of passengers with limited English proficiency.



## Strategies to Address ADA Paratransit Demand and to Enable/Encourage Fixed-Route Service Use

### Travel Training

Valley Transit provides travel training for those individuals with a disability who desire to learn how to use the fixed-route service. Most of the training is done for students in the school system. The schools encourage students with disabilities to use the fixed-route bus.

### Conditional Eligibility

Passengers who do not need the paratransit service for all trips are granted a conditional eligibility. Most often this is given for passengers who are able to travel to and from a bus stop in good weather, but are unable to access the bus stops during the winter months. The conditional eligibility is noted in the person's profile in the scheduling software and visible to the operator taking the reservation request.

### Premium Service Fare

Valley Transit II has a premium service fare for those requesting service above and beyond the requirements of ADA. This allows for additional service for those who need it, but at an additional cost to the user.

### Fixed-Route Fare Reduction

Valley Transit has considered a reduction in fare for those who are certified for use of the paratransit service, but use the fixed-route bus instead. So far this has been only an item of discussion and no action has been taken.

## Lessons Learned

The lessons noted from Valley Transit include:

- Use of volunteers and individuals other than health care professionals was not effective. When the process was set up with a personal interview by an occupational therapist, the screening process was much more effective.
- Conditional eligibility has been successful, allowing individuals to use the paratransit service when needed, but requiring use of fixed-route service when they are able to do so.

- The requirement for recertification was not cost-effective. The requirement was eliminated three years ago because those who were certified typically had a permanent disability and very few users were denied eligibility during the recertification process.

### **Gainesville RTS, Gainesville, Florida**

The Gainesville RTS serves much of the urbanized area of Gainesville, Florida. The system is operated by the City of Gainesville. Complementary ADA paratransit service is provided through the Community Transportation Coordinator. The service area is about 76 square miles with a population of about 160,000.

Individuals may use the service who are either within three-quarters of a mile of the fixed-route service or within the city limits of Gainesville. Trips may be requested from the prior day up to 14 days in advance.

### **Eligibility/Certification Process**

The certification process is conducted by the Center for Independent Living (CIL) through a contract with the City. To start the process, individuals contact the CIL. The CIL sends them a Professional Verification Form (PVF) which may be faxed, mailed, or picked up in person. The PVF must be completed by a licensed health care or rehabilitation professional. An interview is conducted after the PVF is submitted and the applicant is notified within 21 days, but typically within 10 days from submittal of the application. The interview is completed by CIL staff and takes about one hour. The CIL staff interview the applicant and review the PVF to determine the nature of the disability and the limitations related to use of fixed-route transit. CIL is reimbursed a flat fee of \$6,000 per month and conducts 100 to 120 interviews per month, which is about \$50 to \$55 per interview.

Conditional eligibility is granted depending on the nature of the disability, but no trip requests are screened to review whether the passenger has a conditional eligibility or full eligibility.

Recertification is normally required after three years, although this may be extended up to five years based on the nature of the disability at the discretion of the interviewer.

There have been no recent changes in the process and RTS is not considering any changes at the present time. They are satisfied with the process and the results.

### Strategies to Address ADA Paratransit Demand and to Enable/Encourage Fixed-Route Service Use

#### **Free Fare on Fixed-Route Service**

Individuals who are eligible for ADA paratransit service may use the fixed-route service without paying a fare. This has encouraged use of the fixed-route service, but has also been an incentive for people to seek at least conditional eligibility.

#### **Travel Training**

The CIL provides travel training for individuals with disabilities to help them feel more comfortable using the fixed-route RTS services.

### Lessons Learned

Some of the lessons learned from the review of RTS include:

- Certification by CIL is accepted within the disability community. They are advocates for people with disabilities and are viewed as “honest brokers” in the disability community. This has created more acceptance of the eligibility determinations.
- The free fare for those certified as eligible for paratransit service has led to some individuals seeking at least a conditional eligibility so they may use the fixed-route service without paying a fare.

#### **Monterey-Salinas Transit, Monterey, California**

The information regarding the paratransit service provided by Monterey-Salinas Transit (MST) was limited to what was available on the website. Attempts to contact the agency have not been successful to date. Information will be updated when verification and additional information is obtained directly from the agency.

The Monterey-Salinas Transit District was formed in 2010, succeeding the Monterey-Salinas Transit Joint Powers Agency. MST serves a 280-square-mile area of Monterey County and southern Santa Cruz County with a service area population of about 427,000.

Complementary paratransit service is provided by MST RIDES. Service is provided within three-quarters of a mile of the fixed-route service. A taxi voucher program has also been established which may be used by individuals who are eligible to use MST RIDES.

### Eligibility/Certification Process

The certification process starts with the rider completing a short Contact Information Form, and also having a licensed health care provider complete a Professional Verification Form. These are then submitted to MST, and an in-person interview (and perhaps a short trip with a travel trainer) is then scheduled. The application requires verification from a licensed healthcare professional. It appears that MST completes the interviews using agency staff, but this must be verified. Some type of functional assessment may be completed by the travel trainer as part of the interview process.

Certification may be granted for life or for a set period of time depending on the person's condition and need for paratransit service. The applicant is told the length of time for their certification.

Conditional eligibility is given depending on the nature of the disability and the ability to use fixed-route transit. It is not clear if the conditional eligibility is considered when scheduling a ride.

### Strategies to Address ADA Paratransit Demand and to Enable/Encourage Fixed-Route Service Use

#### **Reduced Fare on Fixed-Route Service**

A "Courtesy Card" is available which allows users to pay a discounted fare on the fixed-route system. Eligibility for the "Courtesy Card" requires completion of the Professional Verification Form.

## Travel Training

Travel training is provided by MST for any individuals interested in using the fixed-route service, but may need assistance to become familiar with and learn to use the service.

## **Regional Transportation Commission of Washoe County (RTC), Reno, Nevada**

The information regarding the paratransit service provided by RTC was limited to what was available on the website. The consultant team has spoken with an agency representative, and the agency is undertaking the process of providing the team with the information we have requested. However, this may take additional time, as they need to check with various staff members for responses to our information request.

The Regional Transportation Commission (RTC) of Washoe County provides public transportation in Reno, Sparks, and unincorporated areas of Washoe County, Nevada. RTC operates several services including RTC RIDE, the fixed-route transit service; RTC RAPID, a Bus Rapid Transit line; RTC ACCESS, the ADA complementary paratransit service; and several ridesharing and mobility management programs.

## Eligibility/Certification Process

Eligibility is based on the criteria specified under the ADA. The certification process begins with the applicant filling out an Application Packet and mailing it to the RTC. The rider must then call within one week to schedule their required in-person interview/assessment/examination. A Professional Healthcare Verification Form is included as part of the Application Packet but is not required as part of the application submission. Notification of eligibility is completed within 21 days.

In-person interviews are conducted by a third party contractor at the contractor's facility. The interview is used in conjunction with other assessment tools to determine eligibility and may be conducted individually or in small groups of up to four people. The initial interview includes a short 15 minute orientation by contractor support staff to explain RTC transportation services,

available transportation options, and a description of the assessment process. The interview itself is conducted by an assessor. This individual reviews the application, applicant's current form of transportation, medical verification form (if provided), medical history, observes physical abilities and cognitive state, and educates the applicant about free travel training.

If there is insufficient information available to make an eligibility determination from the interview phase, a physical assessment and/or cognitive assessment is performed by the contractor. The contractor is expected to follow the Project Action guidance for assessments. A physical or cognitive assessment is required approximately six percent of the time.

Conditional eligibility is provided based on specific factors including darkness, ability to travel to and from the bus stop, safety, ability to board the bus, and ability to identify the appropriate bus route and make transfers. Conditional eligibility is not screened at the time a reservation is made.

## Strategies to Address ADA Paratransit Demand and to Enable/Encourage Fixed-Route Service Use

### Feeder Service

Feeder service is provided to some riders who are picked up curbside and taken to the nearest RTC RIDE bus stop. There is no fare on the feeder service for ADA passengers.

### Reduced Fare on Fixed-Route Service

Passengers with a RTC ACCESS card pay a reduced fare on RTC RIDE fixed-route buses.

### Shopper Routes

Scheduled trips are provided on four shopper routes on specified days in selected areas to reduce the demand for individual RTC ACCESS trips. According to an industry report (TCRP Synthesis Report 74, 2008), the shopper routes are provided for ADA paratransit-eligible riders and function as "service routes," with pick-ups and drop-offs anywhere within each route's defined geographic area. Advance reservations are not taken—only same-day requests.

Additionally, the routes serve a number of housing complexes and if a resident wishes to ride the route, a sign is placed in the front window of the complex to alert the driver that there is a waiting passenger. The rider can then plan the return trip directly with the driver. The fare is the same as the ADA paratransit fare. The shopper routes offer benefits of both fixed-route and paratransit service—with the fixed-route convenience of scheduling (same-day service or no need to make a reservation) and somewhat regular schedules and with the assistance of paratransit available (door-to-door, driver assistance). RTC estimated its resulting annual savings from the shopper routes at \$170,000 (figure from 2008).

## **SUMMARY AND CONCLUSIONS**

A wide variety of approaches are used by the agencies reviewed as case studies. Larger agencies have more extensive certification processes including purpose-built centers for functional assessment. Some agencies contract for the certification process while others complete the process using agency personnel with verification from a licensed healthcare professional. Based on the review of all case studies, there are several key findings:

- There are significant benefits from using an in-person interview. The interviewer is able to assess the nature of the disability and its effect on functional mobility as well as the potential need for paratransit service.
- Recertification for all applicants is not universally regarded as cost-effective. During the certification process, the interviewer, and typically with additional information from the healthcare professional, is usually able to tell the extent of the disability and whether the person has a life-long need or a disability condition that could change and the person may no longer need the paratransit service.
- Costs for the certification process vary greatly depending on the extent of the evaluation process. Lowest costs occur with a short in-person interview while a more thorough functional assessment significantly increases the cost of the process.

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## Evaluation of Current Certification Process

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This Chapter provides a review of IVT Access' eligibility and certification procedures. A brief description of the IVT Access Complementary Paratransit service and other demand-response services is provide for background to better understand the relationship of the different services and the certification process.

### ADA AND DEMAND-RESPONSE SERVICES IN IMPERIAL COUNTY

Seven different services comprise Imperial County's available demand-responsive and ADA complementary paratransit system. Two ADA complementary paratransit services are provided for ADA eligible passengers: IVT Access, which operates within Imperial County (within  $\frac{3}{4}$ -mile of the fixed routes), and Med-Express, which connects Imperial County residents with medical services in San Diego County. In addition, five "Dial-a-Ride" demand-responsive services operate within Brawley, Calexico, El Centro, Imperial, and the West Shores area. Each of the demand-responsive services differs in coverage area, certification processes, and clientele and each is designed to serve different functions within the county, although there is some overlap in geographic area and in function (e.g., connecting elderly or disabled passengers with medical appointments and services). These services are outlined in Table III-1.

<b>Table III-1 Imperial County Demand-Responsive Transit Services</b>						
<b>Service</b>	<b>Operator</b>	<b>Service Area</b>	<b>Function and Eligibility</b>	<b>Hours and Days of Service</b>	<b>Reservations</b>	<b>Fares</b>
<b>IVT Access</b>	First Transit	Within ¾-mile of IV Transit fixed routes	Curb-to-curb paratransit for ADA-certified passengers and companions; general public on a space-available basis	Monday-Friday 6:00 a.m.-12:30 a.m.  Saturday 6:00 a.m.- 6:00 p.m.  Sunday 7:00 a.m.-5:30 p.m.	1-14 days in advance  Same day if space permits	\$2.00-\$2.50 (ADA)  \$3.00-\$3.75 (non-ADA)
<b>Med-Express</b>	ARC Imperial Valley	Connects pick-up points in Brawley, El Centro and Calexico with medical facilities in San Diego County	Non-emergency medical transportation	One round-trip, four days per week	1-30 days in advance	\$15.00-\$30.00 per round-trip (passenger)  \$7.00 per round-trip (attendant)
<b>Brawley Dial-a-Ride</b>	Sunrise Driving Service	Within Brawley City Limits	Curb-to-curb demand-responsive transit service for the general public	Monday-Friday 7:00 a.m.-5:00 p.m.	Same day	\$1.00
<b>Calexico Dial-a-Ride</b>	First Transit	Within Calexico City Limits	Curb-to-curb demand-responsive transit service for seniors and disabled persons	Monday-Sunday 8:00 a.m.-5:00 p.m.	One day in advance	\$1.00
<b>Imperial Dial-a-Ride</b>	ARC Imperial Valley	Within city limits of Imperial (includes destinations in El Centro)	Curb-to-curb paratransit for ADA certified passengers and senior citizens	Monday-Friday 7:00 a.m.-4:00 p.m.	1-14 days in advance  Same day if space permits	\$0.75 within Imperial; \$1.75 to/ from El Centro
<b>El Centro Dial-a-Ride</b>	ARC Imperial Valley	Within El Centro city limits	Curb-to-curb paratransit for ADA certified passengers and senior citizens	Monday-Saturday 7:00 a.m.-6:00 p.m.	1-14 days in advance  Same day if space permits	\$1.50
<b>West Shores Dial-a-Ride</b>	ARC Imperial Valley	Connects communities on the West Shore of the Salton Sea with Westmorland	Curb-to-curb paratransit for ADA certified passengers and senior citizens	Tuesday and Thursday, 7:00 AM – 4:00 PM	1-14 days in advance  Same-day if space permits	\$2.00

Following are descriptions of each of the demand-responsive transit services that operate within Imperial County. An emphasis is placed on IVT Access, which is the subject of this particular study. Other services are included to provide context, and in case they are referenced in any of the recommendations of this study.

## **IVT Access**

IVT Access is Imperial County's ADA complementary paratransit service, provided as according to the Americans with Disabilities Act (ADA) of 1990 for passengers who are unable to use the fixed-route bus service due to functional and mobility needs. It operates within  $\frac{3}{4}$ -mile of IV Transit fixed routes as required by the ADA, excluding the areas served near the once-weekly lifeline routes to Ocatillo, Bombay Beach and Winterhaven) and includes the cities of Brawley, Calexico, Calipatria, El Centro, Holtville, Imperial, and Westmorland, and the communities of Heber, Niland, and Seeley. Service operates within a 15-minute "window" of regular IV Transit fixed-route service, corresponding roughly to 6:00 a.m. - 12:30 a.m. Monday through Friday, 6:00 a.m. - 6:00 p.m. on Saturday and 7:00 a.m. - 5:30 p.m. on Sunday.

The service is operated by a private contractor, First Transit, and is "curb-to-curb", meaning that drivers are trained to assist passengers in and out of the vehicles, but not beyond the "curbside" into homes, businesses or medical, or government facilities. Each vehicle is equipped with a hydraulic lift to assist mobility-impaired persons in and out of the vehicle.

Fares are approximately double those for IV Transit fixed-route services—thus \$2.00 for shorter trips or \$2.50 for longer trips. One personal care attendant may accompany each rider without paying a fare. Fares for non-ADA-certified passengers are triple the fixed-route fares, at \$3.00 or \$3.75, depending on trip length.

Trips may be booked Monday through Saturday from 6:00 a.m. - 6:00 p.m. and on Sunday from 7:00 a.m. - 4:30 p.m. by calling (760) 482-2908, and reservations may be made from one to 14 days in advance (although passengers are requested to book at least 48 hours in advance, if possible). Same-day

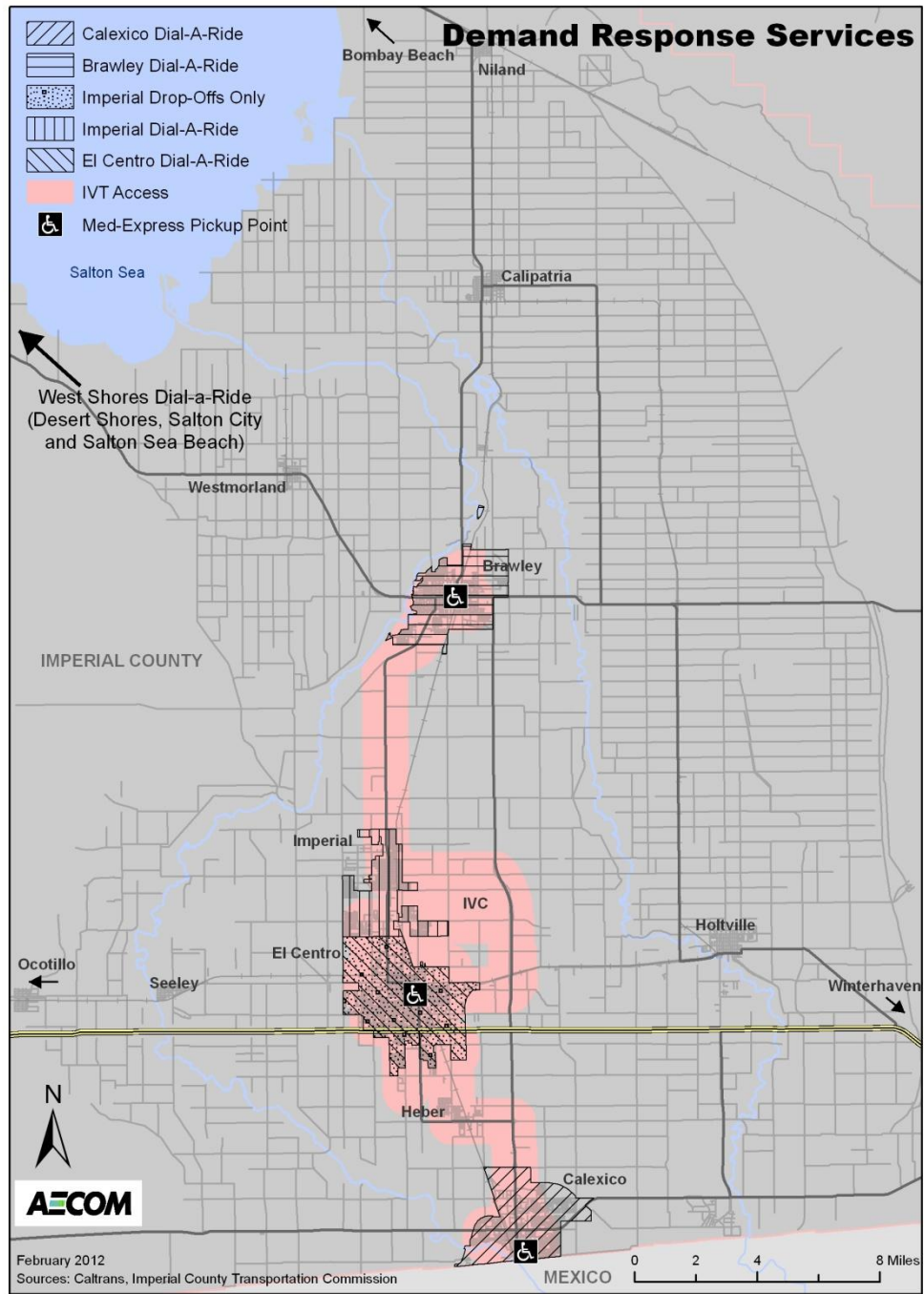
service requests may be honored on a space-available basis. Passengers are expected to be at the curb and ready when their IVT Transit vehicle arrives—drivers may leave passengers who do not show up within five minutes.

The IVT Access service area as shown in the Rider Guide is shown in Figure III-1 below. As IVT Access operates within three-quarters of a mile of the fixed routes, Figure III-2 may be a better indication of the actual service area for the complementary paratransit service.

**Figure III-1: IVT Access Service Area**



Figure III-2



## **Med-Express**

This service connects Imperial County residents with medical facilities in San Diego County. It operates one round-trip, four days per week—every Tuesday, Wednesday, and Thursday and alternating Mondays and Fridays—between designated pick-up/drop-off points in Brawley, Calexico, and El Centro and San Diego County. Med-Express is operated by ARC-Imperial Valley and is intended for use for non-emergency medical appointments. Reservations may be made one to 30 days in advance and fares range from \$15.00-\$30.00 per trip, with a \$7.00 fare for attendants.

## **Brawley Dial-a-Ride**

The Brawley Dial-a-Ride service is a curb-to-curb, demand-responsive transit service within the City of Brawley operated by Sunrise Driving Service. The service operates on weekdays, between 7:00 a.m. and 5:00 p.m., and is available to the general public. Reservations are made the same day as travel and the fare is \$1.00 per trip.

## **Calexico Dial-a-Ride**

The Calexico Dial-a-Ride service is a curb-to-curb, demand-responsive transit service within the City of Calexico operated by First Transit. The service operates seven days per week between 8:00 a.m. and 5:00 p.m. and is available to seniors and individuals with a disability. Reservations are made one day prior to travel and the fare is \$1.00 per trip.

## **El Centro Dial-a-Ride**

The El Centro Dial-a-Ride service is a curb-to-curb, demand-responsive transit service within the City of El Centro operated by ARC-Imperial Valley. This service operates Monday through Saturday between 7:00 a.m. and 6:00 p.m. and is available to seniors and ADA-certified individuals. Reservations are made one to 14 days prior to travel and the fare is \$1.25 per trip. Same day reservations may be made on a space-available basis.



## **Imperial Dial-a-Ride**

The Imperial Dial-a-Ride service is a curb-to-curb, demand-responsive transit service that operates both within the City of Imperial and to destinations in the City of El Centro. It is operated by ARC-Imperial Valley. The service operates Monday through Friday between 7:00 a.m. and 4:00 p.m. and is available to seniors and ADA-certified individuals. Reservations are made one to 14 days prior to travel and the fare is \$0.75 per trip within Imperial or \$1.75 per trip between Imperial and El Centro. Same day reservations may be made on a space-available basis.

## **West Shores Dial-a-Ride**

The West Shores Dial-a-Ride service is a curb-to-curb, demand-responsive transit service that operates within the communities along the West Shore of the Salton Sea and connects residents of those communities with the City of Westmorland. Service is operated by ARC-Imperial Valley and is available to ADA-certified passengers and senior citizens on Tuesdays and Thursdays between 7:00 a.m. and 4:00 p.m. Reservations may be made one to 14 days prior to travel and the fare is \$2.00 per trip.

## **IVT ACCESS CHARACTERISTICS**

This section provides more detailed information about the operations of IVT Access.

### **Performance and Budget**

Table III-2 summarizes the ridership, service attributes, and cost of IVT Access service in FY 2012-2013.

<b>Table III-2</b> <b>IVT Access FY 2012-2013 Ridership</b> <b>Service Attributes and Cost</b>	
<b>Performance Metric</b>	<b>Performance</b>
Total Passengers	29,960
Total Revenue-Miles	271,634
Total Miles	312,837
Total Revenue-Hours	12,346
Total Hours	15,133
Wheelchairs (monthly average)	676
FY 2012-13 Cost	\$959,747
<i>Source: IVT Access Data</i>	

ICTC and state agencies set minimum standards for paratransit performance, which are included in the contract for IVT Access. These standards, as stated in the contract, are shown in Table III-3 below.

<b>Table III-3</b> <b>IVT Access Contractual Standards</b>	
<b>Performance Metric</b>	<b>Contractual Standard</b>
Passengers per Hour	2.4 people
Passengers per Day	98.7 people
Passengers per Mile	7.5 people
Cost per Passenger	\$38.11
Subsidy per Passenger	\$34.30
Cost per Mile	\$5.08
Cost per Hour	\$93.34
Farebox Recovery	10%
<i>Source: IVT Access Contract</i>	

Table III-4 shows the estimated budget for IVT Access for FY 2013-2014. The estimated total cost for service for the year is \$1,670,522. It should be noted that this represents a 74 percent increase over FY 2012-2013.

<b>Table III-4 IVT Access FY 2013-2014 Estimated Budget</b>	
<b>Cost/Revenue Type</b>	<b>Cost/Revenue</b>
Fare Revenue	\$167,052
<b>Subsidies:</b>	
FTA Section 5309/5311	\$42,092
FTA Section 5307/5317	\$652,602
STA	\$772,950
LTF	\$35,826
<b>Total Subsidy</b>	<b>\$1,503,470</b>
Total Revenues + Subsidies	\$1,670,522
<b>Total Cost</b>	<b>\$1,670,522</b>
<i>Source: IVT Access Data</i>	

## Capital Assets and Maintenance

According to the contract, First Transit must maintain eight wheelchair-accessible 20- to 26-foot minibuses and two spares for use for IVT Access service. In addition, all “facilities and arrangements including office space, furniture, dispatch, maintenance bays, secured and lighted parking areas, storage, on/off site fueling, radio, telephone and computer connections are the responsibility of [First Transit].” All facilities must be maintained in accordance with local, state and federal regulations.

## Management and Administration

Service is operated by First Transit, under contract to ICTC. First Transit is responsible for providing all management, office staff, drivers, dispatchers, mechanics, maintenance, clerks, cleaners, service workers, telephone information operators, road supervisors, and other personnel.

However, it should be noted that First Transit does not conduct the eligibility and certification review, described subsequently.

## Requesting or Cancelling a Ride

Trips on IVT Access may be requested by calling the dispatch office at (760) 482-2908 Monday through Friday between 6:00 a.m. and 10:00 p.m., on Saturday between 6:00 a.m. and 6:00 p.m., and on Sunday between 7:00 a.m. and 4:00 p.m. It is preferred that passengers schedule their trips from one to 14

days prior to travel, however same day requests may be honored if space is available.

Callers are requested to provide the following information to the dispatcher:

1. Name
2. Address
3. ADA certification number
4. Phone number
5. Desired destination
6. Desired travel time and return trip
7. When you want to go/return
8. Whether a Personal Care Attendant (PCA) will be accompanying the rider
9. Whether a rider will use a mobility device (i.e., wheelchair)

In addition, the caller is encouraged to write down the reservation, date, and travel time, and confirm the information with the operator before the end of the call.

Cancellations must be made at least four hours before the scheduled trip time. Cancellations less than four hours before the scheduled trip time are considered “late cancellations.”

### **Personal Care Attendants (PCAs)**

Personal Care Attendants are employees, relatives, friends, or care providers of ADA-eligible passengers who accompany the passenger to assist that person. PCAs travel for free when accompanying an eligible rider—the dispatcher must be notified in order to ensure space is available. Children under seven years of age must be accompanied by an adult—the adult is considered a PCA and travels free of charge.

### **Cancellation and No-Show Policies**

A new cancellation and no-show policy was adopted in January 2014. Cancellations must be made at least four hours before the scheduled trip time; cancellations made less than four hours before the scheduled trip time are considered “late cancellations.” Following a no-show, IVT Access will automatically cancel any previously scheduled return trips for that day. The

definition of a “no-show” from the January 2014 No Show/Late Cancellation Policy is:

A “No-show” shall be recognized as an ADA eligible person who fails to appear; fails to board the vehicle, and/or use his/her scheduled transportation within the standard “ready window.” The ready window is the 30 minute time frame the passenger has been advised by dispatchers to be ready for their trip. The bus is required to wait up to 5 minutes for an individual upon arrival within the ready window. If a rider calls within 30 minutes of a scheduled pickup time to cancel his or her trip, the cancellation will be counted as a “no-show.”

The first time an individual is a no-show, he/she is contacted by telephone in order to determine why the trip was missed and to document the no-show occurrence. If the individual has a second no-show within the same calendar month, he/she will be mailed a letter advising that a third no-show within the same month will result in a 14-day suspension of their eligibility for paratransit service. Individuals to whom paratransit service is suspended due to violation of the no-show policy have a right to appeal the suspension. To appeal, a written letter must be received by the ICTC ADA Paratransit Services Coordinator within 15 days of receipt of the notification of suspension. Within 15 days of receipt of this letter, a three-member Americans with Disabilities Act Advisory Committee (ADAAC) will be scheduled to meet within 30 days of receipt of the request to appeal.

## **Other Policies**

### **Mobility Devices**

According to ADA guidelines, wheelchairs must be accommodated if they are no larger than 30 inches wide and 48 inches long (measured two inches from the ground) and do not weigh more than 600 pounds when occupied. Wheelchairs must have working brakes and no leaking batteries, and passengers must use a lap belt for safety. Wheelchairs exceeding the ADA standard cannot be accommodated by IVT Access due to limitations of wheelchair lifts on vehicles.

## Packages

Passengers may carry up to two grocery-bag-sized packages per eligible rider, not including PCAs. Drivers are not required to assist with personal items.

## Visitors and Reciprocity

Individuals who are certified by another transit system are eligible to use IVT Access paratransit service. Visitors must first contact the ADA Certification Coordinator and provide proof of certification and proof of non-resident status prior to using the IVT Access service. If certification is not immediately available, presumptive eligibility will be accepted for “disabilities that are apparent” for up to 21 days of service over a 90-day period. If the individual plans to use the service for more than 21 days, he/she must apply for ADA certification via IVT Access.

## **ELIGIBILITY/CERTIFICATION PROCESS**

IVT Access service is operated as a complementary paratransit service, providing mobility for those who meet the requirements and are unable to use the fixed-route buses. Members of the general public who do not have ADA certification may use IVT Access when space is available, but likely would not be able to use the service during periods of peak travel demand due to capacity constraints.

ADA certification may be obtained by “individuals who have physical or cognitive disabilities and cannot use the regular, fixed-route bus system”, based on an evaluation process for eligibility. Eligibility is based on three factors:

- The individual’s ability to get to/from a fixed-route bus stop
- The individual’s ability to board/exit the bus
- The individual’s ability to navigate the fixed-route system

To become eligible, an individual must complete an ADA Certification Application and mail it to the attention of the ADA Eligibility Coordinator, Imperial County Transportation Commission.

A second form – the Physician’s Form – must be completed by the medical care provider designated by the individual seeking ADA certification. The verification form must be submitted with the application form to the Eligibility Coordinator.

Applications are held by the Eligibility Coordinator until the application is complete, including the physician’s verification. When the application is complete it is processed by ICTC staff with a determination typically made within a week. Applicants are notified in less than 20s day by letter verifying his/her disability and certifying eligibility for use of the ADA complementary paratransit service on either a permanent or temporary basis.

### **ADA Certification Application**

In addition to basic information such as name, address, gender, and contact information, the application form includes the following questions:

1. If the applicant currently uses public transportation, and if so, what type?
2. If the applicant would be interested in training regarding how to use the existing (fixed-route) transit system.
3. If applicant is not currently using public transportation, then why not?
4. What is the nature of the applicant’s disability?
5. Has the disability been evaluated by a medical doctor and, if so, by whom (provide the doctor’s information)?
6. What was the date of the onset of the disability?
7. If the disability is permanent or temporary, and if temporary, what is the approximate duration?
8. If the applicant is currently able to get to and from a transit stop.
9. If the applicant is currently able to get on and off a lift-equipped bus without assistance.
10. Does the applicant use any mobility assistance devices and, if so, what?
11. How far the applicant can continuously walk or move his/her wheelchair.
12. What the combined weight is of the applicant and his/her mobility assistance device.
13. If the applicant will bring an attendant with him/her to use the fixed-route bus system.
14. If the applicant will bring an attendant with him/her to use the ADA paratransit system.
15. If the applicant can climb three steps without assistance.
16. If the applicant can stand without support for ten minutes.
17. Any additional relevant information in determining the applicant’s eligibility.

## **Physician's Form**

The Physician's Form asks about the applicant's diagnosis for a disability that qualifies him/her for ADA paratransit service, as well as any relevant medical history. It then provides a recommendation for the applicant to be eligible for ADA service on a permanent or temporary basis, or if the patient should not be eligible at all. If the applicant is able to use the fixed-route system, and/or his/her medical care provider cannot confirm his/her disability, then the request for ADA certification may be denied.

## **Appeals Process**

If eligibility is denied, if certain conditions are placed on eligibility, or if a particular trip request is denied, applicants for ADA certification have a right to appeal the decision. Appeals must be made within 60 days of the date of the denial letter and must be made in writing by the individual or a parent agency on behalf of its client. If the appeal does not result in a "mutually satisfactory arrangement," then the appeal can be escalated to either the Americans with Disabilities Act Advisory Committee (ADAAC) or the Imperial County Transportation Commission—whichever entity is scheduled to meet first, although ICTC is the final governing authority. If the appeal remains undecided after 30 days, "presumptive eligibility" applies until a decision is reached.

## **Recertification**

Individuals receiving temporary ADA certification must re-apply (i.e., be recertified) in order to continue utilizing the paratransit service as an ADA-certified passenger. The letter indicating the rider's status will indicate when their eligibility expires. Individuals receiving permanent certification do not have to be recertified.

## **Evaluation of the Eligibility/Certification Process**

The following are general strengths and weaknesses of the existing IVT access system.



#### Strengths:

- IVT Access allows advance scheduling of up to two weeks ahead of the trip time.
- Service is available to passengers who are not ADA-certified, making use of additional vehicle capacity not filled by ADA-certified passengers (when available).
- Alternative service options are available to passengers residing within the county's Dial-a-Ride zones, reducing the need for passengers to use IVT Access for intra-city/local trips and providing an alternative service for those who do not have ADA eligibility.
- A long span of service on weekdays and the availability of weekend service.
- Route deviation on fixed routes in the remote zones avoids the need to provide duplicative service in sparsely populated areas of the county.

#### Weaknesses:

- There appears to be a lack of strong coordination with municipal dial-a-ride services.
- According to several project stakeholders, there is a lack of consistent application of the no-show policy.
- There is no formal evaluation process where an independent doctor approves each rider for certification.
- Scheduling can only be done up to two weeks in advance and there are no "subscription" services.
- Service is "curb-to-curb" and not "door-to-door."

The following observations indicate strengths of the certification process and areas where there may be opportunities to make changes to improve the process. Comparison with some of the approaches used by systems in the case studies are also made where appropriate regarding possible changes to the process.

- The certification process is completed quickly and applicants are notified within a few days to a week after submitting a complete application.
- There is no personal interview completed with the applicant. The case studies all have some type of in-person interview as part of the process.

- The website links to the Spanish language versions of the application forms were found to be non-functional. They point to the website for AIM Transit, the name for the service prior to IVT Access.
- There is no consistency in the medical evaluation of a person's disability. Each applicant chooses their healthcare provider and has the verification form completed by that provider. The guidance for the healthcare provider to use in the evaluation is minimal.
- A number of the case study agencies use a third-party evaluator for certification. This has the benefit of consistency in the evaluation and a greater appearance of impartiality.
- ICTC grants temporary eligibility, but does not use conditional eligibility. While many of the case studies have some type of conditional eligibility, most do not screen trip requests based on the conditions. Conditional eligibility with screening of trip request may reduce the demand on the paratransit system.
- ICTC does not make use of demand management strategies such as travel training or reduced fare for use of the fixed-route bus by passengers certified as eligible for IVT Access. Most of the case study systems make use of travel training and several have a reduced fare or no fare or ADA-certified passengers using the fixed routes.
- Sidewalk and pedestrian infrastructure could make access to bus stops easier for passengers with a disability and allow them to use the fixed-route system.
- There is some confusion among users regarding the different services provided by IVT Access and the community Dial-a-Ride systems. The services often overlap and have different eligibility requirements. Trip requests must be made to different agencies.
- IVT Access has increased enforcement of the cancellation/no-show policy which has reduced the number of no-show trips. This improves service productivity and helps to contain costs. However, there has been a perception that the no-show policy is not applied consistently. Some passengers have indicated that a last-minute trip cancellation may be caused by the medical provider and is out of the control of the user. In these cases, users feel that they should not be penalized for the late cancellation.
- ICTC does not have a recertification requirement. Several of the case study agencies have a standard time requirement for recertification and others have found that recertification is not cost effective.
- Functional assessments are used by some agencies. This is more often performed by larger systems as the cost of the certification process increases. Several of the case study agencies did not use a functional

assessment because of the cost or because the in-person interviews are adequate to assess the applicant's need for paratransit service.

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## CHAPTER IV

# Community Input

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### INTRODUCTION

As part of the process to develop recommendations for the ADA certification process, efforts were made to involve users of IVT Access and agencies which refer patients and clients to IVT Access. The outreach efforts included interviews on IVT Access and meetings with groups and an open public meeting. Each of these efforts are described in this chapter.

### PASSENGER INTERVIEWS

The purpose of the ride-alongs was to hear directly from IVT Access riders regarding their experience with the service and the application process. The interviews were the first step in the effort to engage users and caregivers in the study. Additional outreach efforts will be completed as the study progresses.

#### Ride-Along Design

The ride-alongs were conducted as informal, one-on-one conversations to capture additional perspectives from people who may not participate in formal outreach events. Outreach staff approached riders in a friendly, informal manner. All passengers were asked the same questions and interviews were conducted in English and Spanish.

Outreach staff used their own words to engage riders and ask follow-up questions in an effort to tease out as much input as possible from riders. The discussion topics below were used as a loose guide for informal conversations about IVT Access services.

Discussion questions:

- How long have you been using IVT Access?
- What do you like best about IVT Access?
- What do you not like about IVT Access?

- Is it easy for you to request a ride and make a reservation? What makes it easy or difficult?
- What was the process like when you applied to use IVT Access? Were there good things about the application process or things that should be changed?
- Are there changes you would like for IVT Access?

A total of 30 interviews were conducted throughout the ride-along interview study, 25 of which were conducted in Spanish. First, a trial run of the ride-along interviews were conducted on February 5, 2014 to gauge if any changes should be made to the interview questions before the bulk of the interviews were conducted. The trial run of five interviews proved to be successful and no changes were made to the interview questions. The trial run was followed by 25 additional ride-along interviews, which were conducted on February 26, 2014.

## **Key Discussion Points**

Overall, participant responses during the ride-alongs were quite positive, with a few riders sharing specific recommendations and comments about their experiences as riders. Most riders interviewed have been using IVT Access for longer than a year and some shared that they feel the service has created a real community among drivers, riders, and dispatchers. IVT Access service seems to provide some riders with a sense of independence they would not have otherwise. Recommendations shared during interviews include providing riders with earlier pick-up times, longer weekend service, and discounts for student riders. The majority of riders interviewed shared that they had help from a family member or from the Day Out organization when completing the ADA application form. Riders who completed the form themselves shared that they found the process easy. Many riders call and make reservations themselves, but several use the help of Day Out and/or family members. A few riders noted that they sometimes get put on hold when calling to make a reservation. It was suggested that there be multiple dispatchers to allow for handling driver and rider calls separately.

## **Notes from Rider Interviews**

Below are the responses received from each rider during ride-along interviews conducted February 5 and 26, 2014.



## **1. How long have you been using IVT Access?**

- Rider 1 (visually impaired) - Since 2009; 5 years
- Rider 2 (young woman in wheelchair) - about 2 years
- Rider 3 (young ambulatory woman, but not very verbal) - “a few years”
- Rider 4 (Day Out group member) - 2 years
- Rider 5 (Day Out group member) - 4 months
- Rider 6 (young man on wheelchair) - 2 years
- Rider 7 (senior male with embolism) - 2 years
- Rider 8 (senior female) - over a year
- Rider 9 (mature male) - more than 2 years
- Rider 10 (senior male) - don't remember
- Rider 11 (senior male) - 6 months
- Rider 12 (senior female) - 3-4 years
- Rider 13 (senior male) - 2 years
- Rider 14 (visually impaired young man) - 3 years
- Rider 15 (senior with dementia) - did not know
- Rider 16 - since IVT Access began
- Rider 17 - started riding this week
- Rider 18 - about 1.5 years
- Rider 19 - about 3 months
- Rider 20 - 5 years (2 years with ARC and 3 years with Access)
- Rider 21 - 2 years, on and off
- Rider 22 - 3 years
- Rider 23 - 5 years
- Rider 24 - 6 months
- Rider 25 (senior with dementia) - did not know
- Rider 26 - since IVT Access began
- Rider 27 (legally blind) - 5 years (3 years with ARC and 2 years with Access)
- Rider 28 (on dialysis) - 1 year, 3 days per week
- Rider 29 - 2-3 months
- Rider 30 - 1.5 years

## **2. What do you like best about IVT Access?**

- Rider 1 - likes the drivers and feels service is “good”

- Rider 2 - seems fast and on-time; drivers are friendly
- Rider 3 - likes that she could listen to music on her iPhone while traveling
- Rider 4 - no response
- Rider 5 - no response
- Rider 6 - “they take me to places I want to go”
- Rider 7 - everything is fine
- Rider 8 - “they pick me up at my door”
- Rider 9 - service is good; treats riders well
- Rider 10 - good equipment; treats riders well
- Rider 11 - enjoys the A/C; service is good, they protect and take care of me
- Rider 12 - everything is fine
- Rider 13 - they take him back and forth; they treat him well
- Rider 14 - they take him everywhere
- Rider 15 - likes the service
- Rider 16 - all of the drivers are very good
- Rider 17 - everything about the service is good; drivers are very good
- Rider 18 - service is good
- Rider 19 - enjoys the community of passengers; likes that the drivers treat people with respect and all get along
- Rider 20 - likes drivers’ friendly service and appreciates prompt arrivals
- Rider 21 - the drivers are careful and help passengers on and off the bus; drivers are polite
- Rider 22 - likes that the bus is regularly on-time
- Rider 23 - everything is good
- Rider 24 - loves everything about the service
- Rider 25 - doesn’t know
- Rider 26 - likes the service and drivers; very economical; good service
- Rider 27 - likes that it takes riders everywhere; helps rider feel more independent
- Rider 28 - likes the nice drivers and riders, they feel like friends; he enjoys that they call him by his first name; enjoys careful and safe drivers; believes he will use the service for the rest of his life
- Rider 29 - likes that the service allows her to get to medical appointments; doesn’t need to bother kids for rides; enjoys the drivers and their friendly manner and patience

- Rider 30 - enjoys everything about the service, especially drivers' attentive nature and good attitudes; buses are in good condition

### **3. What do you not like about IVT Access?**

- Rider 1 - no dislikes
- Rider 2 - would like fare to be "an even amount"
- Rider 3 - no real dislikes
- Rider 4 - no response
- Rider 5 - no response
- Rider 6 - service is sometimes late, especially when they add people to the route; the schedule could be improved
- Rider 7 - sometime service is late
- Rider 8 - service takes a long time to pick up rider in the afternoons
- Rider 9 - no dislikes; everything is fine
- Rider 10 - no response
- Rider 11 - sometimes the trips are long and not straight to rider's destination
- Rider 12 - nothing
- Rider 13 - rider likes everything
- Rider 14 - sometimes drivers are late
- Rider 15 - no response
- Rider 16 - no complaints; there is one driver he doesn't care for
- Rider 17 - no dislikes
- Rider 18 - no complaints; he doesn't care for one of the drivers who is sometimes rude; that driver doesn't always drive to door as bus may get dirty
- Rider 19 - no dislikes
- Rider 20 - no complaints
- Rider 21 - "can't think of anything"
- Rider 22 - nothing
- Rider 23 - no complaints/dislikes
- Rider 24 - "there isn't a thing I don't like"
- Rider 25 - does not know
- Rider 26 - no dislikes
- Rider 27 - no complaints or dislikes
- Rider 28 - no dislikes
- Rider 29 - no complaints

- Rider 30 - has occasionally been without a ride home as they have forgotten to put rider on pick-up list

**4. Is it easy for you to request a ride and make a reservation? What makes it easy or difficult?**

- Rider 1 - sometimes gets put on hold; likes being able to talk to person
- Rider 2 - only able to make reservations 2 weeks ahead of time; would like to make reservations further in advance
- Rider 3 - finds reservation process easy; simple phone call
- Rider 4 - Day Out schedules reservation
- Rider 5 - Day Out schedules reservation
- Rider 6 - finds it easy to make reservations; sometimes there aren't spots left but dispatcher always helps find one
- Rider 7 - Day Out schedules reservations
- Rider 8 - rider makes reservations; finds it easy
- Rider 9 - wife makes reservations
- Rider 10 - wife make reservations
- Rider 11 - Day Out schedules reservations
- Rider 12 - Day Out schedules reservations
- Rider 13 - Day Out schedules reservations
- Rider 14 - Sometimes I get put on hold for a long time; when calls back rider is told there are no more spots
- Rider 15 - daughter makes reservations
- Rider 16 - family makes the reservations; a simple process
- Rider 17 - daughter makes reservations
- Rider 18 - it is easy to make the reservations; makes them himself
- Rider 19 - family makes the reservations for her
- Rider 20 - finds the registration process simple; just a phone call
- Rider 21 - finds process simple, just a phone call
- Rider 22 - no response
- Rider 23 - daughter makes reservations for him
- Rider 24 - he makes the reservation himself over the phone; finds process simple
- Rider 25 - family makes reservations for rider; finds it simple
- Rider 26 - finds reservation process simple; just a phone call
- Rider 27 - finds reservation process simple and easy; sometimes desired pickup/drop off times are not available because the bus/route is already full, but not regularly

- Rider 28 - reservations are made by his wife; process is simple
- Rider 29 - makes her own reservations 2 weeks in advance; finds process simple
- Rider 30 - finds process simple but sometimes takes a while; gets put on hold sometimes when he calls

**5. What was the process like when you applied to use IVT Access? Were there good things about the application process or things that should be changed?**

- Rider 6 - rider completed sister's and her own application; found process easy
- Rider 7 - Day Out applied for rider
- Rider 8 - daughter helped rider with application
- Rider 9 - wife completed the application
- Rider 10 - son completed application, I did not do a thing
- Rider 11 - Day Out applied for rider
- Rider 12 - Day Out applied for rider
- Rider 13 - Day Out applied for rider
- Rider 14 - can't remember
- Rider 15 - no response
- Rider 16 - family applied for rider; rider has no comment on process
- Rider 17 - daughter handled application process
- Rider 18 - family member handled application process
- Rider 19 - daughter handled application process
- Rider 20 - daughter handled application process; rider doesn't know about process
- Rider 21 - daughter handled application process
- Rider 22 - family completed application process; believes it was easy for them
- Rider 23 - daughter completed application process
- Rider 24 - does not recall application process
- Rider 25 - does not know
- Rider 26 - application process was easy to complete; dropped it off at agency
- Rider 27 - application process was simple and easy; completed form with her mother
- Rider 28 - application process was easy; wife submitted paperwork for him

- Rider 29 - daughter handled application process
- Rider 30 - he completed application process himself; found it simple

#### **6. Are there changes you would like for IVT Access?**

- Rider 6 - would add buses to the routes and add hours on Sundays, preferably running 7 a.m. to 7 p.m.
- Rider 7 - no response
- Rider 8 - would like to get picked up on time in the afternoon
- Rider 9 - improve their pickup times
- Rider 10 - no response
- Rider 11 - nothing, everything is fine
- Rider 12 - everything is fine
- Rider 13 - everything is fine
- Rider 14 - to extend the hours, at least until 12 a.m.
- Rider 15 - no response
- Rider 16 - no suggested changes
- Rider 17 - no suggested changes; everything is good
- Rider 18 - no additional changes or complaints
- Rider 19 - no suggested changes
- Rider 20 - service is good; everything is good; no recommended changes
- Rider 21 - no complaints or suggested changes
- Rider 22 - no suggested changes
- Rider 23 - no suggested changes
- Rider 24 - no suggested changes; happy access passenger; program has always provided good service
- Rider 25 - does not know
- Rider 26 - no complaints; thinks everyone is happy with service
- Rider 27 - would like later weekend service (until 10 p.m. on weekends); most affordable transportation option
- Rider 28 - would like drivers to be allowed to play music in the bus
- Rider 29 - no response
- Rider 30 - suggests there be two dispatchers to eliminate hold time for reservations; more buses would allow specific pick-up/drop-off times for riders; would like to have rides to San Diego offered once a week

## COMMUNITY OUTREACH MEETINGS

Two rounds of community outreach meetings were held to obtain input and feedback from users and agency representatives. The first round of meetings were held on April 1, 2014 with meetings at the Blind Center in El Centro, the El Centro Day Out, Brawley Day Out, and the ICTC office in El Centro. Flyers were distributed on IVT Access and through local agencies which refer individuals to IVT Access and the meetings were announced through local media. In general, there was support for some type of assessment so that the service is available to those who need it most and not used by those who could use IVT instead of the paratransit service. Many users go through some type of assessment for programs in which they participate and do not have an issue with an assessment for IVT Access. There was support for travel training to use fixed-route service, but very few participants were aware of the travel training that is currently available.

The second round of meetings was held June 3, 2014 at the same four locations. The various options for the certification process were presented and feedback was obtained from meeting participants. Again, there was no real opposition to the concept of requiring some type of interview or assessment. There were concerns expressed about who would do the interview or assessment and where they would take place. Interviews should be done by someone who is a third-party and is seen as being impartial. Users do not want to make multiple trips for the certification. There was discussion about conditional assessment and local residents thought that temperatures above 105 degrees were too hot for most users of paratransit to be able to use IVT fixed-route service.

## STAKEHOLDER GROUP

A Stakeholder Group was formed to provide input and feedback to develop an improved certification process. Meetings were held with the Stakeholder Group on February 5, April 2, and June 4, 2014. The first meeting was a study kick-off meeting to present an overview of the study and identify issues to be addressed during the study. The next two meetings followed the community outreach so that the input could be provided to the Stakeholder Group. Interim Working

Papers were presented to the Stakeholder Group and the Group provided feedback for development of the final recommendations.

Updates were provided to the Social Service Transportation Advisory Council (SSTAC) following the community outreach and Stakeholder Group meetings to obtain input and feedback from members of the SSTAC.





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# Certification Process Options

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## INTRODUCTION

A range of options have been developed for consideration. Each is compared with the current process. Criteria were selected to evaluate the different options to help determine the appropriate changes to recommend. This section describes those criteria and the options that have been evaluated.

## EVALUATION CRITERIA

Seven criteria were selected for the evaluation of the options and are described in the following paragraphs.

### Impact on Certification Process and Outcomes

Options may change the number of applications which are received and the number of individuals who are certified as eligible for IVT Access service. This criterion considers the potential change to the number of people who are certified as eligible for the complementary paratransit service. The estimates are based on recent research as part of Transit Cooperative Research Program (TCRP) Project B-40. The data come from previous TCRP studies, a recent National Transit Institute (NTI) course, and case studies. This national research indicates the following outcomes when a transit agency uses in-person interviews and assessments:

- Unconditional eligibility: 38 to 75 percent
- Conditional eligibility: 8 to 54 percent
- Temporary eligibility: 2 to 17 percent
- Not eligible: 1 to 23 percent

### Impact on Applicants

Applicants may be impacted directly by changes in the process. The impacts that may benefit applicants include availability of better information, expanded options for transportation, and opportunities for travel training. Other impacts

may be seen by applicants as disadvantageous, such as the need for one or more trips as part of the application process or more effort to complete the application. The different impacts are identified.

## **Implementation Cost**

Some of the options will require additional cost to implement, such as hiring additional staff or a contractor to complete part of the eligibility assessment process. These costs have been quantified as much as possible for comparison of the various options.

## **Community/User Acceptability**

Input from the community meetings held in April was used to assess the level of support or resistance for each of the options. Concepts similar to each option were presented at meetings with users on April 1 at the Blind Center in El Centro, the Day Out of El Centro, the Day Out of Brawley, and the ICTC offices. Reactions to the different concepts were considered to determine the potential acceptability of each option.

## **Feasibility**

Feasibility relates to the ease with which an option may be implemented. Options may require hiring of additional staff or a qualified contractor.

## **Potential Impact on Ridership**

Changes to the certification process may reduce the number of people who are certified as eligible for IVT Access and subsequently reduce the demand for the service. A demand model for complementary paratransit service was developed using demographic and ridership data for Imperial County. Transit Cooperative Research Program (TCRP) *Report 119: Improving ADA Complementary Paratransit Demand Estimation* established a demand estimation tool developed from statistical analysis of transit systems across the country. The model uses variables of total population, fare, and low-income households. As none of the variables in this demand model would vary with any changes in the certification process, another approach was used. The *ADA Paratransit Handbook* published by the Urban Mass Transportation Administration (now the Federal Transit Administration) in 1991 describes an approach to estimate demand based on the popu-

lation with disabilities, eligibility rates, certification rates, and trip rates. The parameters of this model were adjusted for the IVT Access service area population to reflect 1,221 certified individuals making 29,900 annual trips. The model was then adjusted based on assumptions related to each of the options to determine the potential change in ridership for AVT Access.

It should also be noted that the use of IVT Access varies widely among the users. A review of manifests indicated that about 22 percent of certified individuals are regular users and of these, less than one-fourth or 11 percent of all certified individuals account for about 70 percent of the trips. A reduction in the number of certified individuals will not necessarily result in a corresponding reduction in the level of demand for service because many of those who might have been certified would not be active users of IVT Access.

Estimates of changes in demand are based on changes to the current number of certified users and do not reflect future changes in demand as the number of applicants and eligible users increases over time.

## **Potential Impact on Operating Cost**

The final criterion is the potential impact on operating costs for IVT Access. The changes in demand will relate directly to changes in operating costs for IVT Access. An estimate of marginal operating costs was used to reflect the potential impact. The cost comparisons reflect current operating costs only and do not consider future changes resulting from other factors such as increased labor or fuel costs. These should be seen as costs at a point in time for comparison of the options and should not be seen as estimates of future operating costs.

## **OPTIONS**

Five different options were considered in addition to the status quo option reflecting the current certification process used by ICTC. These options cover a range of strategies that aim for a more comprehensive certification process, ensuring that those certified as eligible meet the federal requirements and have a true need for the service. It must always be kept in mind that funding for public transit in general and specific services such as IVT Access is a limited

resource. If the resource is used by those who do not have a true need, the service may not be available to all who truly do need it.

### **Option 1: Status Quo, No Change to the Current Process**

This is the baseline for comparison. The current process is described in detail in Chapter III and is summarized briefly here. ICTC provides two forms to be used in the certification process. The first form is the application form to request certification for eligibility. The second form is the healthcare professional verification which is used to determine the need of the applicant. The applicant is responsible for obtaining the healthcare professional verification, and the verification form is to accompany the application. The application is reviewed by ICTC staff and approved if all application materials are complete and the healthcare professional has verified the disability and a need for paratransit service.

#### **Impact on Certification Process and Outcomes**

- There would be no change to the process and no impact on the number of individuals applying for and certified as eligible for the IVT Access.
- Without a more comprehensive process to determine eligibility, it is likely that the process certifies some individuals who could use accessible fixed-route service at least some of the time. Comments from users indicate that some users have been certified who are able to use fixed-route service on a regular basis.
- No change in the outcomes of the process would be anticipated. No one is given a conditional eligibility. No applicants are denied eligibility as part of the application process. Temporary eligibility is granted for those who have an obviously temporary need as indicated on the application.

#### **Impact on Applicants**

- No need to learn or adapt to a new process.
- No opportunity to discuss mobility skills/limitations through the eligibility certification process with a knowledgeable transit agency staff member to learn of available accessible transportation options.
- Lack of information may limit local mobility opportunities.
- No opportunity to encourage applicants to take advantage of travel training and learn options for using fixed-route service.

### Implementation Cost

There would be no changes in cost associated with maintaining the status quo option.

### Community/User Acceptability

The community appears to be accepting of the current process. There were few, if any, complaints regarding the certification process from users either during the ride-along interview or during the community meetings. However, there is a recognition, at least by some, that there are people who are certified as eligible and use IVT Access, but may be able to use the fixed-route service and not need the paratransit service.

### Feasibility

There are no feasibility issues or constraints associated with the status quo option.

### Potential Impact on Ridership

There would be no change in demand or anticipated ridership with the status quo option. However, this option would do nothing to slow the increase in the number of people eligible for IVT Access and the corresponding increase in demand.

## **Option 2: In-Person Interviews by ICTC Staff with Healthcare Professional Verification Obtained by Applicant**

This option is similar to the Status Quo but incorporates an in-person interview for every applicant. A complete application would still require verification of the need by a healthcare professional and the applicant would continue to be responsible for obtaining the verification.

### Impact on Certification Process

- Requires a staff person to conduct the interviews.
- The staff person will need training such as the NTI course on ADA Paratransit Eligibility or Easter Seals Project Action publications and webinars and other resources.
- Interview protocol must be developed.

- Forms will be needed to document the interview and findings.
- Accessible space needed to conduct interviews.
- Transportation to and from the interview is needed, with an estimated 70-80 percent of applicants requiring the round-trip. A fare for the trips cannot be charged.

### Impact on Certification Outcomes

- Opportunity to meet applicants face-to-face provides for more accurate assessments and eligibility determinations.
- The interview is an opportunity to educate applicants about accessible transportation options, particularly accessible fixed-route service and travel training opportunities.
- About 25-30 percent of applicants required to have an interview/assessment will self-select out of the process.
- Growth in the number of applicants and resulting number of applicants determined eligible is slowed.
- Estimated determinations:
  - 50-70 percent are determined unconditionally eligible
  - 20-30 percent are determined conditionally eligible
  - 5-15 percent are determined temporarily eligible
  - 2-8 percent are determined not eligible

### Impact on Applicants

- Applicants would have a new requirement to schedule and appear in person to meet with ICTC.
- There would be more effort and time involved to apply for ADA paratransit eligibility.
- Applicants would have an opportunity to learn about available accessible transportation options including accessible fixed-route service and travel training.
- Information about accessible options may improve mobility options.

### Implementation Cost

This option would require staff time to conduct the interviews. Over the past year, the number of applicants averaged 23 per month. The highest month had 30 applications processed and in the lowest month there were 11 applications processed. Assuming that in-person interviews take an average of 30 minutes, this would require about 12 hours of staff time each month. If staff workloads permit, this could be absorbed in the current staff workload, but more likely would require additional staff time and potentially hiring a part-time staff person



to conduct the interviews and process applications. Assuming a total cost of staff time at \$50 per hour, the annual cost would be about \$7,200 per year.

There could be costs associated with training for the assigned staff. A number of options are available at no cost other than staff time, but attendance at the NTI course would require travel and two days of staff time.

Transportation to and from the interviews will be required. At an average cost per ride of \$38, this would cost approximately \$10,500 per year.

### Community/User Acceptability

There does not appear to be resistance to the idea of in-person interviews. Many current users have some type of assessment for other services and would likely accept an interview as part of the process. Availability of free transportation to and from the interview is likely to be a factor in community acceptance.

### Feasibility

This option is feasible if staff have sufficient time to conduct the interviews. If a new person must be hired on a part-time basis, it could be difficult to find someone willing to work for approximately four hours a week.

### Potential Impact on Ridership

Assuming that 25 percent of the potential applicants will elect not to pursue certification, the number of eligible users would be decreased. An additional two to eight percent would not be certified as eligible for the service resulting in a reduction of eligible users added each year by about 30 percent. However, not all certified users have the same trip rate. A small percentage of certified individuals account for a significant percentage of the overall trips on paratransit service. While the number of users added each year could be reduced by about 30 percent, the number of trips may be reduced by less than 10 percent. The most recent number of annual trips was 29,960. For comparison of the options, this could be reduced to about 27,000 annual trips.

### Potential Impact on Operating Cost

A reduction in ridership would lead to a potential reduction in operating costs for IVT Access. The average cost per passenger-trip on IVT Access is about \$38. This includes all fixed costs which would not be reduced because of lower demand. The marginal cost of providing service has been estimated to be about \$27 per passenger-trip. A reduction of 3,000 annual trips would lead to a reduction in operating costs of about \$81,000.

### **Option 3: In-Person Interviews and Functional Assessments by ICTC Staff with Healthcare Professional Verification Obtained by Applicant**

This option is similar to the previous option with the addition of functional assessments conducted by ICTC staff on an as-needed basis. During the interview, ICTC staff would make an initial assessment of the applicant's limitations and needs and determine if a functional assessment is required to determine eligibility. This would require more in-depth training for the ICTC staff responsible for conducting the functional assessment. A medical or physical/occupational therapy (PT or OT) background would be beneficial.

### Impact on Certification Process

- Requires a staff person to conduct the interviews and functional assessments.
- The staff person will need training such as the NTI course on ADA Paratransit Eligibility or Easter Seals Project Action publications and webinars and other resources. A medical background or PT/OT certification would be helpful.
- Interview and functional assessment protocols must be developed.
- An accessible space with props and a course will be needed for the functional assessments.
- Forms will be needed to document the interviews and functional assessments and the findings.
- Transportation to and from the interview is needed, with an estimated 70-80 percent of applicants requiring the round-trip. A fare for the trips cannot be charged.

### Impact on Certification Outcomes

- Opportunity to meet applicants face-to-face with the additional opportunity for a functional assessment provides for more accurate assessments and eligibility determinations.

- The interview is an opportunity to educate applicants about accessible transportation options, particularly accessible fixed-route and travel training opportunities.
- Provides the opportunity to make a better assessment for conditional eligibility.
- About 25-30 percent of applicants required to have an interview/assessment will self-select out of the process.
- Growth in the number of applicants and resulting number of applicants determined eligible is slowed.
- Estimated determinations:
  - 50-70 percent are determined unconditionally eligible
  - 20-30 percent are determined conditionally eligible
  - 5-15 percent are determined temporarily eligible
  - 2-8 percent are determined not eligible

### Impact on Applicants

- Applicants would have a new requirement to schedule and appear in person to meet with ICTC.
- There is a new requirement to potentially have an additional functional assessment following the interview.
- Applicants may have some concerns about the potential of a functional assessment.
- There would be more effort and time involved to apply for ADA paratransit eligibility.
- Applicants would have an opportunity to learn about available accessible transportation options including accessible fixed-route service and travel training.
- Information about accessible options may improve mobility options.

### Implementation Cost

This option would require staff time to conduct the interviews. Assuming that in-person interviews take an average of 30 minutes, this would require about 12 hours of staff time each month. If staff workloads permit, this could be absorbed in the current staff workload, but more likely would require additional staff time and potentially hiring a part-time staff person to conduct the interviews and process applications. Functional assessments would require additional staff time and could require an additional 30 to 60 minutes for each applicant. To estimate the cost, it is assumed that 50 percent of applicants will require a functional assessment, or an average of 12 assessments per month.

Assuming a total cost of staff time at \$50 per hour, the annual cost for interviews and assessments would be about \$14,000 per year.

Props and an evaluation course could cost \$15,000 or more to set up depending on the facility and scope of the assessment course.

Transportation to and from the interviews will be required. At an average cost per ride of \$38, this would cost approximately \$10,500 per year.

### Community/User Acceptability

There does not appear to be resistance to the idea of in-person interviews. Most users have some type of assessment for other services and would likely accept an interview and assessment as part of the process. Availability of free transportation to and from the interview is likely to be a factor in community acceptance.

### Feasibility

This option may be feasible if staff have sufficient time to conduct the interviews and functional assessments. If a new person must be hired on a part-time basis, it could be difficult to find someone with the preferred background and willing to work for approximately five or six hours a week. ICTC does not have sufficient space to conduct the functional assessments at their offices, so this would require additional space or a new location, adding to the cost to implement.

### Potential Impact on Ridership

Assuming that 25 percent of the potential applicants will elect not to pursue certification, the number of eligible users would be decreased. An additional two to eight percent would not be certified as eligible for the service resulting in a reduction of eligible users added each year by about 30 percent. However, not all certified users have the same trip rate. A small percentage of certified individuals account for a significant percentage of the overall trips on paratransit service. While the number of users added each year could be reduced by about 30 percent, the number of trips may be reduced by only about 10 percent. An additional five percent reduction might be possible through the use of conditional eligibility based on the results of the interviews and functional assess-

ment. The most recent number of annual trips was 29,960. For comparison of the options, this could be reduced to about 25,500 annual trips.

### **Potential Impact on Operating Cost**

A reduction in ridership would lead to a potential reduction in operating costs for IVT Access. The average cost per passenger-trip on IVT Access is about \$38. This includes all fixed costs which would not be reduced because of lower demand. The marginal cost of providing service has been estimated to be about \$27 per passenger-trip. A reduction of 4,500 annual trips would lead to a reduction in operating costs of about \$121,000.

### **Option 4: In-Person Interviews by Third-Party Contractor with Healthcare Professional Verification Obtained by Applicant**

This is similar to Option 2 except that the interviews and recommendations for certification would be made by a third-party contractor. The final determination for certification would continue to be made by ICTC, but would be based on the recommendation of the contractor. Applicants would be required to obtain verification of their disability from a healthcare professional.

This option requires finding and contracting with a qualified third-party contractor. The contractor should have some type of medical background with occupational or physical therapy certification preferred. Availability of qualified contractors should be assessed in advance of a competitive procurement process.

### **Impact on Certification Process**

- Requires ICTC to contract with a qualified entity to conduct the interviews.
- ICTC would work with the contractor to develop protocols and forms for interviews and findings.
- ICTC would no longer have day-to-day responsibility for assessing applications.
- ICTC would have contract administration and monitoring responsibility.
- ICTC would make the final decision on determination based on the recommendation from the contractor.
- Transportation to and from the interview/assessment is needed, with an estimated 70-80 percent of applicants requiring the round-trip. A fare for the trips cannot be charged.

## Impact on Certification Outcomes

- Opportunity to meet applicants face-to-face provides for more accurate assessment and eligibility determinations.
- The interview is an opportunity to educate applicants about accessible transportation options, particularly accessible fixed-route and travel training opportunities.
- Provides the opportunity to make a better assessment for conditional eligibility.
- About 25-30 percent of applicants required to have an interview/assessment will self-select out of the process.
- Growth in the number of applicants and resulting number of applicants determined eligible is slowed.
- Estimated determinations:
  - 50-70 percent are determined unconditionally eligible
  - 20-30 percent are determined conditionally eligible
  - 5-15 percent are determined temporarily eligible
  - 2-8 percent are determined not eligible

## Impact on Applicants

- Applicants would have a new requirement to schedule and appear in person to meet with the contractor.
- There would be more effort and time involved to apply for ADA paratransit eligibility.
- Applicants would have an opportunity to learn about available accessible transportation options including accessible fixed-route service and travel training.
- Information about accessible options may improve mobility options.

## Implementation Cost

The cost of a third-party contractor assessment process has been estimated based on experience at other transit agencies. The cost would be \$20 to \$30 per interview for an annual cost of \$5,800 to \$8,600.

Transportation to and from the interviews will be required. At an average cost per ride of \$38, this would cost approximately \$10,500 per year.

## Community/User Acceptability

There does not appear to be resistance to the idea of in-person interviews. Most users have some type of assessment for other services and would likely accept

an interview as part of the process. Availability of free transportation to and from the interview is likely to be a factor in community acceptance.

A third-party contractor may be more acceptable to applicants and the community rather than interviews conducted by ICTC staff. The third-party contractor may be seen as less biased than ICTC staff.

### Feasibility

This option requires that a third-party contractor be available in the community. There are businesses that provide this service, but not located in El Centro. As described in the case studies, other systems have used local colleges, occupational therapists, independent living centers, and physical therapists. There are agencies and businesses in Imperial County that could provide this service.

### Potential Impact on Ridership

Assuming that 25 percent of the potential applicants will elect not to pursue certification, the number of eligible users would be decreased. An additional two to eight percent would not be certified as eligible for the service resulting in a reduction of eligible users added each year by about 30 percent. However, not all certified users have the same trip rate. A small percentage of certified individuals account for a significant percentage of the overall trips on paratransit service. While the number of users added each year could be reduced by about 30 percent, the number of trips may be reduced by only about 10 percent. The most recent number of annual trips was 29,960. For comparison of the options, this could be reduced to about 27,000 annual trips.

### Potential Impact on Operating Cost

A reduction in ridership would lead to a potential reduction in operating costs for IVT Access. The average cost per passenger-trip on IVT Access is about \$38. This includes all fixed costs which would not be reduced because of lower demand. The marginal cost of providing service has been estimated to be about \$27 per passenger-trip. A reduction of 3,000 annual trips would lead to a reduction in operating costs of about \$81,000.

## **Option 5: In-Person Interviews by Third-Party Contractor with Healthcare Professional Verification Only As Needed**

This option is similar to Option 3 with two significant differences. The first is that interviews are completed by a third-party contractor, and the second difference is that verification of a disability by a healthcare professional is required only if determined to be necessary as part of the interview process. The final determination for certification would continue to be made by ICTC, but would be based on the recommendation of the contractor.

This option requires finding and contracting with a qualified third-party contractor. The contractor should have some type of medical background with occupational or physical therapy certification preferred. Availability of qualified contractors should be assessed in advance of a competitive procurement process.

### **Impact on Certification Process**

- Requires ICTC to contract with a qualified entity to conduct the interviews.
- ICTC would work with the contractor to develop protocols and forms for interviews and findings.
- ICTC would no longer have day-to-day responsibility for assessing applications.
- ICTC would have contract administration and monitoring responsibility.
- The contractor would need to obtain applicants' healthcare professional verification when additional information is needed. Typically, decisions for applicants with impaired vision or psychiatric/seizure disabilities rely on opinions of the applicants' healthcare professionals.
- ICTC would make the final decision on determination based on the recommendation from contractor.
- Transportation to and from the interview/assessment is needed, with an estimated 70-80 percent of applicants requiring the round-trip. A fare for the trips cannot be charged.

### **Impact on Certification Outcomes**

- Opportunity to meet applicants face-to-face provides for more accurate assessment and eligibility determinations.
- The interview is an opportunity to educate applicants about accessible transportation options, particularly accessible fixed-route service and travel training opportunities.
- Provides the opportunity to make a better assessment for conditional eligibility.



- About 25-30 percent of applicants required to have an interview/assessment will self-select out of the process.
- Growth in the number of applicants and resulting number of applicants determined eligible is slowed.
- Estimated determinations:
  - 50-70 percent are determined unconditionally eligible
  - 20-30 percent are determined conditionally eligible
  - 5-15 percent are determined temporarily eligible
  - 2-8 percent are determined not eligible

### Impact on Applicants

- Applicants would have a new requirement to schedule and appear in person to meet with the contractor.
- There would be more effort and time involved to apply for ADA paratransit eligibility.
- Applicants would not have to provide verification by a healthcare professional, but only provide contact information and permission to contact the professional if needed.
- Applicants would have an opportunity to learn about available accessible transportation options including accessible fixed-route service and travel training.
- Information about accessible options may improve mobility options.

### Implementation Cost

The cost of a third-party contractor assessment process has been estimated based on experience at other transit agencies. The cost would be \$20 to \$30 per interview for an annual cost of \$5,800 to \$8,600.

Transportation to and from the interviews will be required. At an average cost per ride of \$38, this would cost approximately \$10,500 per year.

### Community/User Acceptability

There does not appear to be resistance to the idea of in-person interviews. Most users have some type of assessment for other services and would likely accept an interview as part of the process. Availability of free transportation to and from the interview is likely to be a factor in community acceptance.

A third-party contractor may be more acceptable to applicants and the community rather than interviews conducted by ICTC staff. The third-party contractor may be seen as less biased than ICTC staff.

Some applicants would appreciate the elimination of the requirement for certification by a healthcare professional. Individuals who apply on their own often have to pay for the verification. Many of the applicants have the verification completed by another program and would experience little difference in the process.

### Feasibility

This option requires that a third-party contractor be available in the community. There are businesses that provide this service, but not located in El Centro. As described in the case studies, other systems have used local colleges, occupational therapists, independent living centers, and physical therapists. There are agencies and businesses in Imperial County which could provide this service.

### Potential Impact on Ridership

Assuming that 25 percent of the potential applicants will elect not to pursue certification, the number of eligible users would be decreased. An additional two to eight percent would not be certified as eligible for the service resulting in a reduction of eligible users added each year by about 30 percent. However, not all certified users have the same trip rate. A small percentage of certified individuals account for a significant percentage of the overall trips on paratransit service. While the number of users added each year could be reduced by about 30 percent, the number of trips may be reduced by only about 10 percent. The most recent number of annual trips was 29,960. For comparison of the options, this could be reduced to about 27,000 annual trips.

### Potential Impact on Operating Cost

A reduction in ridership would lead to a potential reduction in operating costs for IVT Access. The average cost per passenger-trip on IVT Access is about \$38. This includes all fixed costs which would not be reduced because of lower demand. The marginal cost of providing service has been estimated to be about \$27 per passenger-trip. A reduction of 3,000 annual trips would lead to a reduction in operating costs of about \$81,000.

## **Option 6: In-Person Interviews and Functional Assessments by Third-Party Contractor with Healthcare Professional Verification Obtained by Applicant**

This is similar to Option 3 but with the interview and functional assessment performed by a third-party contractor. The final determination for certification would continue to be made by ICTC, but would be based on the recommendation of the contractor. Applicants would be required to obtain verification of their disability from a healthcare professional.

This option requires finding and contracting with a qualified third-party contractor. The contractor should have some type of medical background with occupational or physical certification preferred. Availability of qualified contractors should be assessed in advance of a competitive procurement process.

### **Impact on Certification Process**

- Requires ICTC to contract with a qualified entity to conduct the interviews and assessments.
- ICTC would work with the contractor to develop protocols and forms for interviews, assessments, and findings.
- ICTC would no longer have day-to-day responsibility for assessing applications.
- ICTC would have contract administration and monitoring responsibility.
- Depending on how the contract is structured and how payment is provided for functional assessments, ICTC would need to particularly monitor the contractor's decision on the need for a functional assessment.
- ICTC would make the final decision on determination based on the recommendation from contractor.
- Transportation to and from the interview/assessment is needed, with an estimated 70-80 percent of applicants requiring the round-trip. A fare for the trips cannot be charged.

### **Impact on Certification Outcomes**

- Opportunity to meet applicants face-to-face with the additional opportunity for a functional assessment provides for more accurate assessment and eligibility determinations.
- The interview is an opportunity to educate applicants about accessible transportation options, particularly accessible fixed-route service and travel training opportunities.
- Provides the opportunity to make a better assessment for conditional eligibility.

- About 25-30 percent of applicants required to have an interview/assessment will self-select out of the process.
- Growth in the number of applicants and resulting number of applicants determined eligible is slowed.
- Estimated determinations:
  - 50-70 percent are determined unconditionally eligible
  - 20-30 percent are determined conditionally eligible
  - 5-15 percent are determined temporarily eligible
  - 2-8 percent are determined not eligible

### Impact on Applicants

- Applicants would have a new requirement to schedule and appear in person to meet with the contractor.
- There would be more effort and time involved to apply for ADA paratransit eligibility.
- Applicants may have some concerns about the potential for a functional assessment.
- Applicants would have an opportunity to learn about available accessible transportation options including accessible fixed-route service and travel training.
- Information about accessible options may improve mobility options.

### Implementation Cost

The cost of a third-party contractor assessment process has been estimated based on experience at other transit agencies. The cost would be \$20 to \$30 per interview for an annual cost of \$5,800 to \$8,600. Assuming that 50 percent of the applicants would require a functional assessment which may cost \$50 to \$75 each, there would be an additional cost of \$7,200 to \$10,800 for a total cost of \$13,700 to \$19,000 annually.

Transportation to and from the interviews will be required. At an average cost per ride of \$38, this would cost approximately \$10,500 per year.

### Community/User Acceptability

There does not appear to be resistance to the idea of in-person interviews. Most users have some type of assessment for other services and would likely accept an interview and assessment as part of the process. Availability of free transportation to and from the interview is likely to be a factor in community acceptance.

A third-party contractor may be more acceptable to applicants and the community rather than interviews conducted by ICTC staff. The third-party contractor may be seen as less biased than ICTC staff.

### Feasibility

This option requires that a third-party contractor be available in the community. There are businesses that provide this service, but not located in El Centro. As described in the case studies, other systems have used local colleges, occupational therapists, independent living centers, and physical therapists. There are agencies and businesses in Imperial County that could provide this service.

### Potential Impact on Ridership

Assuming that 25 percent of the potential applicants will elect not to pursue certification, the number of eligible users would be decreased. An additional two to eight percent would not be certified as eligible for the service resulting in a reduction of eligible users added each year by about 30 percent. However, not all certified users have the same trip rate. A small percentage of certified individuals account for a significant percentage of the overall trips on paratransit service. While the number of users added each year could be reduced by about 30 percent, the number of trips may be reduced by only about 10 percent. An additional five percent reduction might be possible through the use of conditional eligibility based on the results of the interviews and functional assessment. The most recent number of annual trips was 29,960. For comparison of the options, this could be reduced to about 25,500 annual trips.

### Potential Impact on Operating Cost

A reduction in ridership would lead to a potential reduction in operating costs for IVT Access. The average cost per passenger-trip on IVT Access is about \$38. This includes all fixed costs which would not be reduced because of lower demand. The marginal cost of providing service has been estimated to be about \$27 per passenger-trip. A reduction of 4,500 annual trips would lead to a reduction in operating costs of about \$121,000.

## SUMMARY

Table V-1 provides a summary comparison of the options. The primary differences among the options, beyond the status quo, are in the costs to implement the option and feasibility. Community acceptance is likely to be similar for all of the options, based on the study's efforts thus far. Outreach and consultation with current users, disability organizations and agencies, and others who work with people with disabilities in the area will be needed to discuss and introduce any changes as well as the reasons for such change. Such outreach and consultation is required by the ADA. Reductions in demand and savings in operating costs also are expected to be similar for all of the options.

Table V-1 Comparison of Options						
Evaluation Factor	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6
Impact on Process	No Change	Minor	Major	Minor	Minor	Major
Impact on Outcomes	No Change	Reduced Certifications	Reduced Certifications	Reduced Certifications	Reduced Certifications	Reduced Certifications
Impact on Applicants	No Change	Minor	Minor	Minor	Minor	Minor
Implementation Cost (Annual)	None	\$17,700	\$24,500	\$19,100	\$19,100	\$29,500
Initial Implementation Cost	None	None	\$15,000	None	None	None
Acceptability	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable	Acceptable
Feasibility	N/A	May not be feasible	May not be feasible	Likely feasible	Likely feasible	Likely feasible
Impact on Demand	No Change	Reduce 3,000	Reduce 4,500	Reduce 3,000	Reduce 3,000	Reduce 4,500
Impact on Operating Cost	No Change	Reduce \$81,000	Reduce \$121,000	Reduce \$81,000	Reduce \$81,000	Reduce \$121,000

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## Paratransit Service Needs

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### INTRODUCTION

A key step in reviewing the process for determining eligibility and certifying individuals to use IVT Access is a careful analysis of the potential ridership on IVT Access paratransit services as a result of modifications to the eligibility and certification procedures. There are several factors that affect demand, not all of which can be forecasted. The analysis makes intensive use of the demographic data and trends. The estimates of demand and the resulting cost impacts are based on the existing service area and do not include any estimates for expansion of the fixed-route and complementary paratransit service area.

### ADA PARATRANSIT DEMAND ESTIMATION MODEL

LSC prepared ADA Paratransit demand estimates for IVT Access based on the *ADA Paratransit Handbook* developed by the Urban Mass Transportation Administration (now the Federal Transit Administration). Factors used in this methodology include demographics, eligibility criteria, certification rates, and trip rates. The methodology does not normally include program-related trips. However, since many of the trips provided by IVT Access are related to programs, particularly the Day Out programs, these trips were incorporated into the demand estimates. Other methodologies which are available do not incorporate these factors which are directly related to the certification process.

Paratransit trips are frequently designated as:

- Program-related: Program-related trips occur only to support specific programs, and the demand is directly related to the number of participants in the program.
- Non-program-related trips: Non-program trips are represented most by those individuals traveling for work, school, or other personal reasons.

Low and high demand estimates are produced with this methodology and are shown in Table VI-1. The demand estimates have been calculated by census block group and show the current demand for paratransit services for IVT Access Service Area in Imperial County. The model (presented in Table VI-1) was adjusted to the existing annual demand seen on IVT Access to reflect 1,221 certified individuals making 29,900 annual trips.



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## **PARATRANSIT DEMAND WITH IMPLEMENTATION OF THE RECOMMENDED POLICIES**

In the past, IVT Access has relied on local demand-response transportation providers in the service area such as Brawley Dial-A-Ride, Calexico Dial-A-Ride, Imperial Dial-A-Ride, and El Centro Dial-A-Ride to pickup/drop-off people making trips entirely within their respective service areas. IVT Access has provided service in the IVT fixed-route corridors between communities and in areas not served by the local Dial-a-Ride Service. IVT Access will now provide complementary paratransit to individuals with disabilities for any trips in the areas of those communities served by IVT if requested. This will increase the demand on IVT Access, as there would be an increase in the number of users and the number of trips provided. People who were scheduling trips on other demand-response transportation providers may now schedule their trips on IVT Access, so the trip rates in Brawley, Calexico, Imperial, and El Centro were increased to reflect this policy change. Table VI-2 presents the existing demand on IVT Access with the implementation of all the recommended policies and the need for IVT Access to provide service in Brawley, Calexico, Imperial, and El Centro. Table VI-2 indicates that the existing annual demand for ADA paratransit services on IVT Access would result in 1,295 certified individuals (six percent increase from the existing users) that would make 35,085 annual trips (a 17 percent increase from the existing trips provided).

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## **FUTURE PARATRANSIT DEMAND FOR YEARS 2020 AND 2025**

Based on implementation of the recommended policies, ICTC would remove their ADA paratransit application material from their website and require all interested applicants to contact ICTC to request an application. This initial discussion would help the individual determine their eligibility and allow them to opt-out by not submitting an application if they determined themselves to be ineligible. This will reduce the number of applications processed as some applicants would decide not to apply for certification. Revising the IVT Access's healthcare professional verification form to provide more detailed information about ADA requirements and eligibility will not have an impact on the number of applicants but is expected to reduce the number who are found eligible by a small percentage. The next step after completing the application would be the in-person interview performed by ICTC staff. The in-person interview will give ICTC an opportunity to assess the individual's eligibility for IVT Access. This process is expected to reduce the number of applications by 25 to 30 percent. Recertification may have result in a small reduction of certifications, but will be more beneficial in managing the database of certified individuals. With implementation of the recommended policies, it was assumed that there would be a net reduction of ten percent in the certification factor/eligibility for future years.

IVT Access Demand has been based on population projections for year 2020 and year 2025. Tables VI-3 and VI-4 presents the future paratransit demand based on implementation of the recommendations to change the certification process. As presented in Table VI-3, IVT Access paratransit demand in 2020 would have 1,500 certified individuals (a 23 percent decrease from the existing users) who would make 40,600 annual trips (a 36 percent increase from the existing trips). As presented in Table VI-4, IVT Access paratransit demand in 2025 would have 1,630 certified individuals (a 34 percent increase from the existing users) who would make 44,200 annual trips (a 48 percent increase from the existing trips provided).

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Table VI-3													
2020 ICTC Estimated Paratransit Demand based on Recommendations													
Area	Census Tract	Census Block Group	Total 2020 Population	% of Mobility Limited Population 2015	2020 Mobility Limited Population	ADA Eligibility Factor	Estimate of ADA Eligible Population	Certification Factor	Estimate of Certified Population	Trip Rates (1) per Eligible Person Per Month		Certified Population Annual Trips	
										Low	High	Low	High
Calipatria/Niland	010102	1	2,093	10.9%	228	50.0%	114	14%	31	0.0	2.5	0	929
Calipatria	010102	2	2,835	10.9%	308	50.0%	154	14%	42	1.8	3.5	906	1,761
	010102	3	3,041	10.9%	331	50.0%	165	14%	45	1.8	3.5	972	1,889
	010102	4	1,822	10.9%	198	50.0%	99	14%	27	1.8	3.5	582	1,132
Westmorland	010200	2	1,320	9.6%	126	50.0%	63	14%	17	1.8	3.5	370	720
Brawley	010400	1	1,502	7.8%	118	50.0%	59	10%	12	2.5	4.0	374	591
	010400	2	1,875	7.8%	147	50.0%	73	10%	15	2.5	4.0	466	737
	010400	3	646	7.8%	51	50.0%	25	10%	5	2.5	4.0	161	254
	010400	4	2,575	7.8%	202	50.0%	101	10%	21	2.5	4.0	640	1,012
	010400	5	2,114	7.8%	166	50.0%	83	10%	17	2.5	4.0	526	831
	010500	1	4,526	6.2%	278	50.0%	139	10%	29	0.1	5.0	48	1,747
	010500	2	1,332	6.2%	82	50.0%	41	10%	9	2.5	4.0	260	412
	010500	3	1,016	6.2%	63	50.0%	31	10%	7	2.5	4.0	199	314
	010500	4	2,043	6.2%	126	50.0%	63	10%	13	2.5	4.0	399	631
	010600	1	2,184	7.2%	156	50.0%	78	10%	16	2.5	4.0	496	785
	010600	2	1,231	7.2%	88	50.0%	44	10%	9	2.5	4.0	280	442
	010600	3	1,750	7.2%	125	50.0%	63	10%	13	2.5	4.0	398	629
	010600	4	2,629	7.2%	188	50.0%	94	10%	20	2.5	4.0	597	944
	010700	1	2,621	6.8%	178	50.0%	89	10%	19	2.5	4.0	566	896
	010700	2	2,350	6.8%	160	50.0%	80	10%	17	2.5	4.0	508	803
	010700	3	1,863	6.8%	127	50.0%	63	10%	13	2.5	4.0	403	637
Holtville	010900	1	1,164	9.2%	107	50.0%	53	14%	15	1.8	3.5	314	611
	010900	2	1,988	9.2%	183	50.0%	91	14%	25	1.8	3.5	536	1,043
	010900	3	977	9.2%	90	50.0%	45	14%	12	1.8	3.5	263	512
	010900	4	1,064	9.2%	98	50.0%	49	14%	13	1.8	3.5	287	558
	010900	5	1,285	9.2%	118	50.0%	59	14%	16	1.8	3.5	347	674
	010900	6	1,284	9.2%	118	50.0%	59	14%	16	1.8	3.5	346	673
Imperial	011000	1	1,586	4.8%	76	50.0%	38	10%	8	2.5	4.0	242	383
	011000	2	669	4.8%	32	50.0%	16	10%	3	2.5	4.0	102	162
	011000	3	934	4.8%	45	50.0%	22	10%	5	2.5	4.0	143	225
	011000	4	1,426	4.8%	69	50.0%	34	10%	7	2.5	4.0	218	344
	011000	5	4,686	4.8%	225	50.0%	113	10%	24	0.1	5.0	38	1,414
Imperial County	011000	6	1,702	4.8%	82	50.0%	41	14%	11	2.5	4.0	338	534
	011100	1	245	5.9%	15	50.0%	7	14%	2	1.8	3.5	43	83
	011100	2	867	5.9%	52	50.0%	26	14%	7	1.8	3.5	151	294
Seeley	011100	3	1,759	5.9%	105	50.0%	52	14%	14	1.8	3.5	307	597
El Centro	011201	1	2,434	5.0%	122	50.0%	61	10%	13	2.5	4.0	387	612
	011201	2	3,446	5.0%	173	50.0%	86	10%	18	3.1	4.4	666	953
	011202	1	3,278	7.8%	257	50.0%	128	10%	27	3.1	4.4	991	1,418
	011202	2	1,757	7.8%	138	50.0%	69	10%	14	3.1	4.4	531	760
	011202	3	1,921	7.8%	150	50.0%	75	10%	16	3.1	4.4	581	831
Imperial County	011300	1	2,351	7.2%	170	50.0%	85	14%	23	1.8	3.5	498	969
El Centro	011300	2	1,890	7.2%	136	50.0%	68	10%	14	3.1	4.4	527	753
Heber	011300	3	3,684	7.2%	266	50.0%	133	14%	36	1.8	3.5	781	1,518
	011300	4	2,936	7.2%	212	50.0%	106	14%	29	1.8	3.5	622	1,210
El Centro	011400	1	1,624	7.0%	113	50.0%	57	10%	12	3.1	4.4	437	624
	011400	2	1,097	7.0%	76	50.0%	38	10%	8	3.1	4.4	295	422
	011400	3	3,257	7.0%	227	50.0%	113	10%	24	3.1	4.4	876	1,252
	011500	1	2,290	14.1%	323	50.0%	161	10%	34	3.1	4.4	1,246	1,782
	011500	2	1,159	14.1%	163	50.0%	82	10%	17	3.1	4.4	631	902
	011500	3	2,335	14.1%	329	50.0%	165	10%	34	3.1	4.4	1,270	1,817
	011500	4	1,837	14.1%	259	50.0%	129	10%	27	2.4	4.4	780	1,430
	011600	1	1,921	8.2%	157	50.0%	78	10%	16	3.1	4.4	605	865
	011600	2	3,185	8.2%	260	50.0%	130	10%	27	3.1	4.4	1,003	1,435
	011600	3	816	8.2%	67	50.0%	33	10%	7	3.1	4.4	257	368
	011600	4	1,763	8.2%	144	50.0%	72	10%	15	3.1	4.4	555	794
	011700	1	2,788	6.9%	192	50.0%	96	10%	20	3.1	4.4	742	1,061
	011700	2	1,228	6.9%	85	50.0%	42	10%	9	3.1	4.4	327	467
	011700	3	2,512	6.9%	173	50.0%	87	10%	18	3.1	4.4	668	956
	011801	1	911	4.7%	43	50.0%	22	10%	5	3.1	4.4	167	238
	011801	2	1,422	4.7%	67	50.0%	34	10%	7	3.1	4.4	260	372
	011802	1	1,769	6.7%	119	50.0%	60	10%	12	3.1	4.4	460	657
	011802	2	915	6.7%	62	50.0%	31	10%	6	3.1	4.4	238	340
011802	3	2,444	6.7%	164	50.0%	82	10%	17	3.1	4.4	635	908	
011802	4	1,212	6.7%	82	50.0%	41	10%	9	3.1	4.4	315	450	
011803	1	4,066	3.8%	155	50.0%	77	10%	16	3.1	4.4	598	855	
Calxico	011900	1	612	8.7%	53	50.0%	27	10%	6	2.5	5.4	168	359
	011900	2	10,137	8.7%	878	50.0%	439	10%	92	0.1	6.4	150	7,054
	011900	3	1,907	8.7%	165	50.0%	83	10%	17	2.5	4.0	525	830
	012001	1	3,958	13.5%	534	50.0%	267	10%	56	2.5	4.0	1,696	2,682
	012001	2	1,411	13.5%	190	50.0%	95	10%	20	2.5	4.0	605	956
	012002	1	4,006	7.5%	301	50.0%	150	10%	31	2.5	4.0	954	1,509
	012002	2	3,205	7.5%	240	50.0%	120	10%	25	2.5	4.0	763	1,207
	012100	1	1,913	10.0%	190	50.0%	95	10%	20	2.5	4.0	605	956
	012100	2	3,631	10.0%	361	50.0%	181	10%	38	2.5	4.0	1,148	1,815
	012100	3	1,485	10.0%	148	50.0%	74	10%	15	2.5	4.0	469	742
	012100	4	2,328	10.0%	232	50.0%	116	10%	24	1.8	3.5	524	1,018
	012200	1	3,606	6.5%	234	50.0%	117	10%	24	2.5	4.0	743	1,175
	012200	2	1,399	6.5%	91	50.0%	45	10%	9	2.5	4.0	288	456
	012200	3	1,075	6.5%	70	50.0%	35	10%	7	2.5	4.0	221	350
012200	4	2,151	6.5%	140	50.0%	70	10%	15	2.5	4.0	443	701	
Ocotillo	012301	2	177	4.3%	8	50.0%	4	14%	1	1.8	3.5	22	43
Bombay Beach	012400	1	723	21.2%	153	50.0%	77	14%	21	1.8	3.5	450	875
Total			170,885	8.0%	13,729		6,751		1,498			40,547	75,020
Source: California Department of Finance, Demographic Research Unit, January 2013													
(1) Source: Survey of 7 "exemplary" paratransit operators. Crain, Et al. "Working Paper 6: Service Needs Analysis, San Francisco Bay Area Regional Paratransit Plan," Jan. 1990.													

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Table VI-4														
2025 ICTC Estimated Paratransit Demand based on Recommendations														
Area	Census Tract	Census Block Group	Total 2025 Population	% of Mobility Limited Population 2025	2025 Mobility Limited Population	ADA Eligibility Factor	Estimate of ADA Eligible Population	Certification Factor	Estimate of Certified Population	Trip Rates (1) per Eligible Person Per Month		Certified Population Annual Trips		
										Low	High	Low	High	
Calipatria/Niland	010102	1	2,281	10.9%	248	50.0%	124	14%	34	0.0	2.5	0	1,012	
Calipatria	010102	2	3,089	10.9%	336	50.0%	168	14%	46	1.8	3.5	987	1,919	
	010102	3	3,314	10.9%	361	50.0%	180	14%	49	1.8	3.5	1,059	2,059	
	010102	4	1,985	10.9%	216	50.0%	108	14%	29	1.8	3.5	634	1,233	
Westmorland	010200	2	1,438	9.6%	137	50.0%	69	14%	19	1.8	3.5	404	785	
Brawley	010400	1	1,637	7.8%	128	50.0%	64	10%	13	2.5	4.0	407	644	
	010400	2	2,043	7.8%	160	50.0%	80	10%	17	2.5	4.0	508	803	
	010400	3	704	7.8%	55	50.0%	28	10%	6	2.5	4.0	175	277	
	010400	4	2,806	7.8%	220	50.0%	110	10%	23	2.5	4.0	698	1,103	
	010400	5	2,303	7.8%	180	50.0%	90	10%	19	2.5	4.0	573	906	
	010500	1	4,931	6.2%	303	50.0%	152	10%	32	0.1	5.0	52	1,904	
	010500	2	1,452	6.2%	89	50.0%	45	10%	9	2.5	4.0	284	448	
	010500	3	1,108	6.2%	68	50.0%	34	10%	7	2.5	4.0	216	342	
	010500	4	2,226	6.2%	137	50.0%	68	10%	14	2.5	4.0	435	688	
	010600	1	2,380	7.2%	170	50.0%	85	10%	18	2.5	4.0	541	855	
	010600	2	1,341	7.2%	96	50.0%	48	10%	10	2.5	4.0	305	482	
	010600	3	1,907	7.2%	136	50.0%	68	10%	14	2.5	4.0	433	685	
	010600	4	2,865	7.2%	205	50.0%	102	10%	21	2.5	4.0	651	1,029	
	010700	1	2,856	6.8%	194	50.0%	97	10%	20	2.5	4.0	617	976	
	010700	2	2,561	6.8%	174	50.0%	87	10%	18	2.5	4.0	553	875	
	010700	3	2,030	6.8%	138	50.0%	69	10%	14	2.5	4.0	439	694	
	Holtville	010900	1	1,269	9.2%	117	50.0%	58	14%	16	1.8	3.5	342	665
		010900	2	2,166	9.2%	199	50.0%	99	14%	27	1.8	3.5	584	1,136
		010900	3	1,064	9.2%	98	50.0%	49	14%	13	1.8	3.5	287	558
010900		4	1,159	9.2%	106	50.0%	53	14%	14	1.8	3.5	313	608	
010900		5	1,400	9.2%	129	50.0%	64	14%	17	1.8	3.5	378	734	
010900		6	1,399	9.2%	128	50.0%	64	14%	17	1.8	3.5	377	734	
Imperial	011000	1	1,728	4.8%	83	50.0%	42	10%	9	2.5	4.0	264	417	
	011000	2	730	4.8%	35	50.0%	18	10%	4	2.5	4.0	111	176	
	011000	3	1,018	4.8%	49	50.0%	24	10%	5	2.5	4.0	155	246	
	011000	4	1,554	4.8%	75	50.0%	37	10%	8	2.5	4.0	237	375	
	011000	5	5,107	4.8%	245	50.0%	123	10%	26	0.1	5.0	42	1,540	
Imperial County	011000	6	1,855	4.8%	89	50.0%	45	14%	12	2.5	4.0	368	582	
	011100	1	267	5.9%	16	50.0%	8	14%	2	1.8	3.5	47	91	
	011100	2	944	5.9%	56	50.0%	28	14%	8	1.8	3.5	165	321	
Seeley	011100	3	1,917	5.9%	114	50.0%	57	14%	16	1.8	3.5	335	651	
El Centro	011201	1	2,653	5.0%	133	50.0%	66	10%	14	2.5	4.0	422	667	
	011201	2	3,755	5.0%	188	50.0%	94	10%	20	3.1	4.4	726	1,038	
	011202	1	3,572	7.8%	280	50.0%	140	10%	29	3.1	4.4	1,080	1,545	
	011202	2	1,914	7.8%	150	50.0%	75	10%	16	3.1	4.4	579	828	
	011202	3	2,093	7.8%	164	50.0%	82	10%	17	3.1	4.4	633	905	
Imperial County	011300	1	2,562	7.2%	185	50.0%	92	14%	25	1.8	3.5	543	1,056	
El Centro	011300	2	2,060	7.2%	149	50.0%	74	10%	16	3.1	4.4	574	821	
Heber	011300	3	4,014	7.2%	290	50.0%	145	14%	39	1.8	3.5	851	1,654	
	011300	4	3,199	7.2%	231	50.0%	115	14%	31	1.8	3.5	678	1,318	
El Centro	011400	1	1,770	7.0%	123	50.0%	62	10%	13	3.1	4.4	476	681	
	011400	2	1,196	7.0%	83	50.0%	42	10%	9	3.1	4.4	321	460	
	011400	3	3,549	7.0%	247	50.0%	124	10%	26	3.1	4.4	954	1,365	
	011500	1	2,495	14.1%	352	50.0%	176	10%	37	3.1	4.4	1,358	1,942	
	011500	2	1,263	14.1%	178	50.0%	89	10%	19	3.1	4.4	687	983	
	011500	3	2,544	14.1%	359	50.0%	179	10%	38	3.1	4.4	1,384	1,980	
	011500	4	2,002	14.1%	282	50.0%	141	10%	30	2.4	4.4	850	1,558	
	011600	1	2,093	8.2%	171	50.0%	85	10%	18	3.1	4.4	659	943	
	011600	2	3,471	8.2%	283	50.0%	142	10%	30	3.1	4.4	1,093	1,564	
	011600	3	889	8.2%	73	50.0%	36	10%	8	3.1	4.4	280	401	
	011600	4	1,921	8.2%	157	50.0%	78	10%	16	3.1	4.4	605	866	
	011700	1	3,038	6.9%	209	50.0%	105	10%	22	3.1	4.4	808	1,156	
	011700	2	1,339	6.9%	92	50.0%	46	10%	10	3.1	4.4	356	509	
	011700	3	2,737	6.9%	189	50.0%	94	10%	20	3.1	4.4	728	1,041	
	011801	1	993	4.7%	47	50.0%	24	10%	5	3.1	4.4	182	260	
	011801	2	1,549	4.7%	73	50.0%	37	10%	8	3.1	4.4	283	405	
	011802	1	1,928	6.7%	130	50.0%	65	10%	14	3.1	4.4	501	716	
	011802	2	997	6.7%	67	50.0%	34	10%	7	3.1	4.4	259	370	
	011802	3	2,663	6.7%	179	50.0%	90	10%	19	3.1	4.4	692	990	
	011802	4	1,320	6.7%	89	50.0%	44	10%	9	3.1	4.4	343	491	
011803	1	4,431	3.8%	169	50.0%	84	10%	18	3.1	4.4	651	932		
Callexico	011900	1	666	8.7%	58	50.0%	29	10%	6	2.5	5.4	183	391	
	011900	2	11,046	8.7%	957	50.0%	479	10%	100	0.1	6.4	163	7,687	
	011900	3	2,079	8.7%	180	50.0%	90	10%	19	2.5	4.0	572	904	
	012001	1	4,313	13.5%	582	50.0%	291	10%	61	2.5	4.0	1,848	2,922	
	012001	2	1,537	13.5%	208	50.0%	104	10%	22	2.5	4.0	659	1,042	
	012002	1	4,365	7.5%	328	50.0%	164	10%	34	2.5	4.0	1,040	1,644	
	012002	2	3,492	7.5%	262	50.0%	131	10%	27	2.5	4.0	832	1,315	
	012100	1	2,085	10.0%	208	50.0%	104	10%	22	2.5	4.0	659	1,042	
	012100	2	3,957	10.0%	394	50.0%	197	10%	41	2.5	4.0	1,251	1,977	
	012100	3	1,619	10.0%	161	50.0%	81	10%	17	2.5	4.0	512	809	
	012100	4	2,537	10.0%	253	50.0%	126	10%	26	1.8	3.5	571	1,109	
	012200	1	3,929	6.5%	255	50.0%	127	10%	27	2.5	4.0	810	1,280	
	012200	2	1,525	6.5%	99	50.0%	49	10%	10	2.5	4.0	314	497	
	012200	3	1,171	6.5%	76	50.0%	38	10%	8	2.5	4.0	241	382	
	012200	4	2,344	6.5%	152	50.0%	76	10%	16	2.5	4.0	483	764	
Ocotillo	012301	2	193	4.3%	8	50.0%	4	14%	1	1.8	3.5	24	47	
Bombay Beach	012400	1	788	21.2%	167	50.0%	84	14%	23	1.8	3.5	491	954	
Total			186,213	8.0%	14,712	7,356		1,632				44,184	81,749	
Source: California Department of Finance, Demographic Research Unit, January 2013														
(1) Source: Survey of 7 "exemplary" paratransit operators. Crain, Et al. "Working Paper 6: Service Needs Analysis, San Francisco Bay Area Regional Paratransit Plan," Jan. 1990.														

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## OPERATING COST IMPACTS

The potential impact on operating costs for IVT Access has been estimated based on increasing demand and implementation of the proposed certification process. The demand identified in the previous section was used to identify the change in operating costs for IVT Access. The average cost per passenger-trip on IVT Access is about \$38. This includes fixed costs which will not be reduced with a lower demand on IVT Access. The estimated marginal cost of providing service on IVT Access is \$27 per passenger-trip which was used to estimate the financial impacts.

- **Existing IVT Access Paratransit Demand:** Based on the recommended changes and increased demand in Brawley, Calexico, Imperial, and El Centro, there will be an increase of 5,200 trips. An increase of 5,200 annual trips would lead to an increase in operating costs of about \$140,400.
- **2020 IVT Access Paratransit Demand:** Based on projected population growth and the paratransit demand relationships, there will be an expected increase of 10,650 annual trips from the existing service because of population growth in the IVT Access service area. The marginal cost of providing service in year 2020 has been estimated as \$40 per passenger-trip (five percent inflation in cost was assumed every year). An increase of 10,650 annual trips would lead to an increase in operating costs of about \$426,000 over current operations.
- **2025 IVT Access Paratransit Demand:** This looks at IVT Access Paratransit Demand in the year 2025. There will be an increase of 14,300 annual trips from year 2020 because of population growth in the IVT Access service area. The marginal cost of providing service in year 2025 has been estimated to be \$51 per passenger-trip (five percent inflation in cost was assumed every year). An increase of 14,300 annual trips would lead to an increase in operating costs of about \$729,300.

## CAPITAL IMPACTS AND COSTS

Potential capital impacts and costs for IVT Access have been estimated based on the potential impact on ridership with the recommended changes to the ADA eligibility and certification process. The current facilities and arrangements that First Transit provides under contract to IVT Access will not change—office space, furniture, dispatch, maintenance bays, secured and lighted parking areas, storage, on/off site fueling, radio, and telephone and commuter connections will continue to be the responsibility of First Transit or a new selected contractor. With the existing demand (before the recommended procedures would be implemented), First Transit must maintain eight wheelchair-accessible 20-26 foot minibuses and two spares for use for IVT Access service under their current contract. We recommend using smaller vehicles for IVT Access—a 15-passenger wheelchair accessible minibus which is estimated to cost \$70,000. Using that same ratio of eight vehicles for 14 passenger-trips per day, the number of vehicles was calculated for the existing demand (after implementing the recommended changes), for year 2020, and year 2025.

- **Existing IVT Access Paratransit Demand:** Based on the recommended changes and the service to be provided in Brawley, Calexico, Imperial, and El Centro, there will be an increase of 5,200 annual trips. This would mean that ten wheelchair-accessible minibuses and two spares may be needed. Using the cost of a minibus estimated at \$70,000, the capital cost for using two more vehicles is estimated to be \$140,000.
- **2020 IVT Access Paratransit Demand:** There will be an increase of 10,650 annual trips because of population growth in the IVT Access service area, there will be a need for two more vehicles in year 2020—one vehicle and one spare vehicle. Using the cost of a minibus estimated at \$70,000, the capital cost in year 2020 is estimated to be \$140,000.
- **2025 IVT Access Paratransit Demand:** Since there is an increase of 14,287 annual trips because of population growth in the IVT Access service area over the existing demand, one additional vehicle will be

needed beyond those for the year 2020 to meet the demand and an additional spare vehicle to maintain the proper spare ratio. Using the cost of a minibus estimated at \$70,000, the capital cost in year 2025 is estimated to be \$140,000.

## POTENTIAL SOURCES OF REVENUE

Successful transportation systems are strategic about funding. ICTC will need to pursue federal, state, and local funding sources to cover increased capital and operating costs on IVT Access. They would continue to pursue funds from their current sources including FTA Section 5309 (which is now replaced by FTA Section 5337), FTA Section 5311, FTA Section 5307, FTA Section 5317 (now folded into the 5310 program), State Transportation Development Act (TDA) including Local Transportation Fund (LTF) and State Transit Assistance (STA), and local fare revenue. Below is a list of potential funding sources that ICTC could pursue.

### Federal Transit Funding Sources

- **Safety Authority 5329:** This is a new program under MAP-21. MAP-21 establishes a Public Transportation Safety Program authorizing FTA to establish and enforce a new comprehensive framework to oversee the safety of public transportation. It provides additional authority to set minimum safety standards, and conducts investigations, audits, and examinations. It overhauls state safety oversight. There are new safety requirements for all recipients.
- **FTA Section 5339 Bus and Bus Facilities Program:** This new grant program replaces the previous Section 5309 discretionary Bus and Bus Facilities program. This capital program provides funding to replace, rehabilitate, and purchase buses and related equipment, and to construct bus-related facilities. Authorized funding is \$422 million in FY2013 and \$428 million in FY2014. Each year, \$65.5 million is allocated with each State receiving \$1.25 million and each territory (including DC and Puerto Rico) receiving \$500,000. The remaining

funding is distributed by formula-based on population, vehicle revenue miles, and passenger-miles. This program requires a 20 percent local match. The demand for this grant funding will be very high, making it a very competitive funding source.

- ***FTA Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities (New Freedom):*** This grant consolidates the 5310 and New Freedom program eligibilities into a single formula program. In fiscal year 2013, \$225 million in funding was authorized. In fiscal years 2013 and 2014, \$255 million and \$258 million in funding was authorized, respectively.
- ***FTA Section 5311 Rural Area Formula Grants:*** This program consolidates the 5311 and JARC-eligible activities into a single program. This program provides funding to states for the purpose of supporting public transportation in rural areas. The program establishes a \$5 million discretionary and \$25 million formula tribal grant program. In fiscal years 2013 and 2014, there was \$600 million and \$608 million in funding authorized, respectively.

## **Other Potential Federal Funds**

The US Department of Transportation funds other programs, including the Research and Special Programs Administration (RSPA), and the National Highway Traffic Safety Administration's State and Community Highway Grants Program (which funds transit projects that promote safety).

A wide variety of other federal funding programs provide support for transportation programs for the elderly and handicapped. Some of these are currently being used in the area and others can be explored further, including the following, some of which are described in more detail in this section:

- Retired Senior Volunteer Program (RSVP)
- Title IIIB of The Older Americans Act
- Medicaid Title XIX
- Veterans' Affairs

- Job Training Partnership Act (JTPA)
- Temporary Assistance for Needy Families (TANF)
- Developmental Disabilities
- Housing and Urban Development (Bridges to Work and Community Development Block Grants)
- Head Start
- Department of Energy
- Vocational Rehabilitation
- Health Resources and Services Administration
- Senior Opportunity Services
- Special Education Transportation
- Weed and Seed Program, Justice Department
- National Endowment for the Arts
- Rural Enterprise Community Grants, Agriculture Department
- Department of Commerce, Economic Development and Assistance Programs
- Pollution Prevention Projects, Environmental Protection Agency

### Surface Transportation Program (STP)

The funds from this program may be spent on any road that is functionally classified as a Collector or Arterial for urban streets or as a Major Collector or Arterial for rural areas. The types of projects may range from rehabilitation to new construction. These funds may also be used for transit projects.

### Older Americans Act

Through the Administration on Aging's Title III-B program, funds are awarded on a formula basis to state and area agencies on aging for the purpose of providing supportive services for older persons, including the operation of multipurpose senior centers. Many area agencies on aging use these funds to help meet the transportation needs of older persons.

### Rural Development Loan Fund

These loans finance business activities in rural communities and towns with a population of less than 25,000. Transportation facilities and other community development projects are among the eligible uses of borrowed funds. Some loans are made to direct borrowers; others are awarded to national and local nonprofit intermediaries. These intermediaries then make and service loans to individual borrowers.

### Department of Commerce, Economic Development Administration

Grants support capital facilities in economically distressed areas, including transportation facilities and infrastructure improvements. Funds are also available for planning and adjustment assistance in communities experiencing severe economic deterioration. Public bodies, private nonprofit organizations, and Native American Indian tribes are eligible applicants.

### Supportive Housing for Persons with Disabilities

This Department of Housing and Urban Development, Office of Housing program helps private nonprofit entities provide housing and necessary supportive services for low-income persons with disabilities. Transportation is among the supportive services that may be funded through this program.

### Community Development Block Grants

The Community Development Block Grant (CDBG) program supports a wide variety of community and economic development activities, with priorities determined at the local level. Some communities have used CDBG funds to assist in the construction of transportation facilities or for operating expenses and vehicle acquisition for community transportation services. Most CDBG funds are distributed on a formula basis to entitled cities, states, and urban counties. In addition, the Economic Development Initiative provides competitive grants and the Section 108 loan guarantee program underwrites commercial lending to carry out CDBG activities.

### Supportive Housing Program

The Supportive Housing Program provides a broad range of assistance for housing and related services for homeless persons. Transportation to link supportive housing residents with other necessary services may be funded. State and local governments, private nonprofit agencies, and community mental health associations are eligible to apply.

### Housing Opportunities for Persons with AIDS

The Housing Opportunities for Persons with AIDS Program (HOPWA) provides grants for housing and supportive services for low-income persons with HIV/AIDS and their families. Grants may be used to provide transportation services to assist clients in accessing health care and other services. Most funding (90 percent) is awarded on a formula basis to state and city governments.

### Resident Opportunities and Self-Sufficiency Program

Known as ROSS, this program links public and Indian housing residents to needed services by providing grants for supportive services, resident empowerment activities, and activities that assist residents in becoming economically self-sufficient. Transportation-related activities and services are allowable uses of this program's funds.

### Department of Justice Weed and Seed Program

This program seeks to combat violent crime through a multi-faceted approach of crime prevention and community improvement strategies, including the improvement of facilities and services (such as those related to transportation) in high-crime areas. Much of Weed and Seed's activity is the provision of training and technical assistance to areas seeking to implement these strategies. In addition, the program funds local efforts being carried out by coalitions of community groups, local governments, and US Attorneys' offices.

### Senior Community Service Employment Program

This program, authorized by Title V of the Older Americans Act, provides formula grants to states and grants to national nonprofit organizations for

subsidized employment, and related services for low-income elders. Transportation is among the services provided through this program.

### Workforce Investment Pilot and Demonstration Programs

This is a program of demonstrations and innovations in providing job training services. Particular emphases are to initiate pilot projects operating in more than one state and to serve groups with particular labor market disadvantages. Transportation services that are part of these projects can be supported.

### Workforce Investment Act Programs

The Workforce Investment Act (WIA) provides funding to state and local workforce development agencies for a variety of youth, adult, and dislocated worker employment and training services. States may use these funds to help provide transportation to training programs for program participants. State employment and training agencies receive these funds, which are then passed on to area workforce development boards, who allocate program resources according to local workforce development plans.

### Veterans' Employment and Training Service, Homeless Veterans' Reintegration Project

This is a program of discretionary grants to local public and private nonprofit organizations to provide employment and training services that help urban and rural homeless veterans re-enter the workforce. Funds may be used to provide transportation, outreach, and other support services.

### Department of Education, Federal TRIO Programs

TRIO is a program of outreach and support targeted to help disadvantaged students progress from middle school to college. TRIO's Student Support Services program provides supportive services to disadvantaged college students with the goal of helping these students successfully complete their studies. Grants are awarded to institutions of higher education, which then may provide a broad range of supportive services (including services to help students with disabilities overcome transportation or other access barriers) to eligible students.



### Vocational Rehabilitation Grants

Vocational rehabilitation funds are distributed to state rehabilitation agencies on a formula basis to provide a full range of rehabilitative services. Funds may be used for transportation to these services.

### Centers for Independent Living

This program provides support to local nonprofit centers for independent living, enabling them to provide training, counseling, advocacy, and supportive services to individuals with significant disabilities. Transportation services are provided through this program. These funds are only awarded to local nonprofit centers.

### Developmental Disabilities Basic Support and Advocacy Grants

This program provides formula grants to state agencies serving the developmentally disabled for the purpose of enabling persons with developmental disabilities to become fully integrated into their communities. Funds are used to support the activities of state developmental disabilities planning councils, and to provide a variety of support services, including transportation.

### Social Services Block Grants

Also known as Title XX, this program provides formula funds to state welfare agencies to provide social services, including transportation services, that help individuals reduce welfare dependency, achieve self-sufficiency, or forestall unnecessary use of institutional care. Since the advent of welfare reform in 1996, there has been a decline in federal support for this program.

### Community Health Centers

This program supports primary health care centers in medically underserved areas, migrant communities, public housing sites, and at organizations providing medical care to homeless persons. Funds may be used to provide transportation services as necessary to provide health care services. Private nonprofit and public health agencies are eligible applicants.

## Rural Health Outreach and Research

Funds are provided for demonstration grants to expand or enhance the availability of health services in rural areas and for applied research in the field of rural health services. Transportation services that improve the availability of rural health care can be funded through this program. Public agencies and private nonprofits are eligible applicants.

## Medicaid

Medicaid is a program of medical assistance for qualified low-income persons and persons with disabilities. Under this program, states are required to arrange for transportation of beneficiaries to and from medical care. Individual states determine how transportation costs are to be paid and which transportation providers are eligible program participants.

## Corporation for National Service, National Senior Service Corps

The National Senior Service Corps provides volunteer and community service opportunities for older persons through three programs: the Foster Grandparent Program, the Retired Senior Volunteer Program, and the Senior Companion Program. In each of these, program funds may be used to support the transportation needs of program participants.

## **Federal Highway Administration**

### Federal Lands Highway Program

This is a program of coordinated funding for public roads and transit facilities serving federal and Indian lands. It has five components, all of which—despite the “roads” terminology—allow their funds to be used for transit capital projects (e.g., vehicles, buildings, and other facilities):

- Indian Reservation Roads
- National Park Service Roads and Parkways
- Forest Service Highways
- Fish and Wildlife Service Refuge Roads

- Other Federal Public Lands Highways

### **Congestion Mitigation and Air Quality Improvement Program (CMAQ)**

Jointly administered by FHWA and the Federal Transit Administration (FTA), the CMAQ program provides funding for projects and programs in air quality nonattainment and maintenance areas for ozone, carbon monoxide (CO), and particulate matter which reduce transportation-related emissions. New transit systems and service expansions are eligible for these funds. The federal share is generally 80 percent, subject to a sliding scale of 90 percent for interstate projects. Certain other activities—including carpool/vanpool projects, priority control systems for emergency vehicles and transit vehicles, and traffic control signalization—receive a federal share of 100 percent.

## **Department of Health and Human Services**

### **Community Services Block Grant Programs**

Under these programs, states and Indian tribes receive funding to provide a broad range of social services for low-income persons. Most of the funds in this set of programs are awarded as formula-based block grants to states, which pass them on to local community action programs. An important component of these community services programs is the Job Opportunities for Low-income Individuals (JOLI) program, through which the federal Office of Community Services awards discretionary grants to local nonprofits that are creating employment and business opportunities for welfare recipients and other low-income individuals. Transportation services are commonly provided in both the block grant and JOLI programs.

## **Administration for Children and Families**

### **Head Start**

Head Start is a program of comprehensive services for economically disadvantaged preschool children. Funds are distributed to tribes and local public and nonprofit agencies to provide child development and education services, as well as supportive services such as transportation. Head Start

funds are used to provide transportation services, acquire vehicles, and provide technical assistance to local Head Start centers.

### Temporary Assistance for Needy Families (TANF)

States receive these formula grants, known as TANF, to provide cash assistance, work opportunities, and necessary support services for needy families with children. States may choose to spend some of their TANF funds on transportation and related services needed by program beneficiaries.

## **Department of Agriculture**

### Rural Community Advancement Program (RCAP)

Among the grant and loan activities funded through this program are:

- Rural business development loans and grants (including Rural Business Enterprise Grants to local governments, private nonprofits, and tribal governments to facilitate business development; and Rural Business Opportunity Grants to local governments, private nonprofits, business cooperatives, and tribal governments for economic development planning, training, and technical assistance).
- Housing and community facilities loans and grants (including Community Facilities loans, loan guarantees, and grants to public entities, private nonprofits, and tribal governments for the development of health care, public safety, and other public facilities, which can include transportation facilities).

## **Housing and Urban Development**

### Rural Housing and Economic Development Grants

This program provides technical assistance and capacity building funds to private nonprofits, housing finance agencies, community development corporations, and tribal, state, and local community or economic development agencies to help develop and carry out innovative housing and community development strategies. To the extent that transportation plans and programs

fit into such strategies, they can be supported through these grants. Funds are awarded every year on a competitive basis.

## **California Transit Funding Sources**

### **Transportation Development Act (TDA)**

The major portion of Transportation Development Act (TDA) funds are provided through the Local Transportation Fund (LTF). These funds are generated by a 1/4 cent statewide sales tax, returned to the county of origin. The returned funds must be spent for the following purposes:

- Two percent may be provided for bicycle facilities per TDA statutes. (Article 4 and 4.5)
- Up to five percent may be claimed by a Consolidated Transportation Services Agency (CTSA) for its operating costs, purchasing vehicles or purchase of communications and data processing equipment. (Article 4.5)
- The remaining funds must be spent for transit and paratransit purposes, unless a finding is made by the Transportation Commission that no unmet transit needs exist that can be reasonably met. (Article 4 or 8)
- If a finding of no unmet needs reasonable to meet is made, remaining funds can be spent on roadway construction and maintenance purposes. (Article 8)

Typically no TDA funds are allocated to streets and roads unless counties can show that there are no unmet transit needs.

### **State Transit Assistance (STA) Funds**

In addition to LTF funding, the TDA includes a State Transit Assistance (STA) funding mechanism which is derived from the statewide sales tax on diesel fuel. Statute requires that 50 percent of STA funds be allocated according to population and 50 percent be allocated according to operator revenues from the prior fiscal year.

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# Recommended Changes to Certification Process

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This Chapter provides the recommended changes to improve the ADA eligibility and certification process. A range of options were presented in Chapter V. These options were presented to users and stakeholders. The options have been refined to develop the recommendations in this Chapter.

## IVT ACCESS WEBSITE

The IVT Access website should be revised to reflect the new certification process. Specific changes recommended for the website include:

- Provide more detailed information about ADA paratransit eligibility and IVT Access service.
- Include a detailed description of eligibility requirements.
- Include a checklist for self-assessment of eligibility.
- Describe eligibility features of fixed-route service.
- Emphasize availability of travel training.
- Remove application forms from website, substitute with a picture.
- Remove the healthcare professional verification form from the website.
- Ensure all changes to the website are accessible.

A recommended self-assessment checklist is included in Appendix B.

An option would be to provide a link to download the application forms after the person has completed the self-assessment checklist. This would still ensure that the applicant considers the eligibility criteria, but may reduce the number of initial phone calls to be answered by ICTC staff.

This is a low cost action. Some staff time will be required for the revisions and updates.

## **INITIAL PHONE CALL**

All applicants for certification of eligibility for IVT Access should be required to contact ICTC by telephone or in person. The purpose of this initial contact is to help the person determine if IVT Access is an appropriate transportation option and if they should submit an application. The ICTC staff should use a standard script for this initial call. An example script is provided in Appendix C. Other facets of this initial contact include:

- Applications may be sent by regular mail or email, may be picked up in person at the ICTC office, or may be downloaded from the website after the applicant completes the self-assessment checklist.
- Applicant should be asked if they have completed the on-line self-assessment and if not, the ICTC staff will help the caller complete the self-assessment as part of the phone call.

Explain purpose of service and requirements for eligibility. This recommendation will require some staff time to complete the initial telephone call. However, no additional staffing is anticipated. Some individuals will self-determine that they may not be eligible as the information is provided during the initial telephone call.

## **APPLICATION FORMS AND INFORMATION BROCHURE**

The application forms and information brochure should be revised to reflect the changes in the certification process. The recommended forms are included in Appendix D. Changes to the information brochure should be consistent with the recommended changes for the website.

This will require some initial staff time, but is a low cost action to implement. Better information will help applicants decide whether or not to complete the application.

## **IN-PERSON INTERVIEWS**

This is the most significant change recommended for the certification process. All individuals who apply for eligibility to use IVT Access will be required to

complete an in-person interview after the application form and healthcare professional verification forms have been completed and submitted to ICTC. The applicant should contact ICTC to schedule an appointment to submit the forms and complete the interview once the forms have been completed. ICTC must complete the interview and make an eligibility determination within 21 days of receiving the completed application. Elements to be considered in conducting the in-person interviews include:

- If the applicant needs transportation to and from the in-person interview, this would be scheduled on IVT Access and provided without charge.
- Interviews could be conducted by ICTC staff or third-party contractor.
- Interviews would be conducted at ICTC office or on-site for group programs such as Day Out.
- Interviewer would preferably have a healthcare background or at a minimum, training in ADA certification. Training is available through programs such as Easter Seals Project Action.
- Interviewer would make an assessment of functional abilities related to use of public transportation based on observation and interview questions.
- Provides opportunity to describe mobility options including use of IVT fixed-route service.
- Provides opportunity to emphasize travel training and determine potential to use fixed-route service with travel training.
- Interviewer may recommend travel training if appropriate.
- Interviewer should also be the person who provides travel training if the applicant agrees to participate. This gives the individual responsible for interviews and training an additional opportunity to determine if the person is able to use fixed-route transit and under what conditions.

This action has the highest cost to implement. The implementation cost is estimated to be about \$7,200 of staff time annually. Additional staffing may be required for these interviews and travel training. Transportation to and from the

interviews may cost as much as \$10,500 annually. However, the reduction in operating costs which result from lower demand could be as much as \$81,000 per year given the current level of demand. As population characteristics change and more people become eligible, the actual cost savings will be less, but the growth in demand is expected to be reduced by 10 percent per year.

## **RECERTIFICATION**

All individuals who have been certified as eligible for IVT Access should go through a recertification process every five years. A consistent recertification process will help to keep the user database current with respect to eligible individuals and mobility needs.

Recertification should start with a telephone call to verify information about the individual including address and disability status. An interview may be necessary for individuals whose condition has changed or who has had a significant change in the type of mobility device used.

The recommended approach for all currently certified individuals is to start recertification on the fifth anniversary of their initial certification. For all current users, an in-person interview should be completed for the first recertification. The in-person interview is recommended as an equitable approach for those who have been certified to determine if they are eligible for the service. Some individuals may choose not to be recertified because they do not use IVT Access or their condition is such that they would not be eligible. After the initial recertification for current users, the next recertification should be done by telephone and interviews conducted only if needed.

The initial recertification will require staff time of about 30 minutes per interview. This should be a one-time cost for each individual with subsequent recertification interviews requiring much less time.

## **FUTURE CONSIDERATIONS**

The recommended changes in the certification process may reduce the number of eligible individuals by 25 to 30 percent. If demand for IVT Access service continues to grow significantly, it may be necessary to implement other

measures to control the growth in demand. Two measures which may be considered include functional assessments and conditional eligibility.

## **Functional Assessments**

Functional assessments would be conducted based on the results of the in-person interview. The purpose of the functional assessment is to determine if the individual is able to use the fixed-route service or needs the more specialized service provided by IVT Access. The functional assessment would include physical and cognitive abilities to navigate and use IVT fixed-route service.

The functional assessment should be conducted by a third party contractor. This will maintain impartiality and avoid perceptions of bias in the assessment. A draft scope of services is provided in Appendix E for selecting a third party contractor to perform functional assessments.

Functional assessments are not recommended for immediate implementation because of the high cost and the likely small number of individuals who would be determined to be ineligible for IVT Access. This strategy is more cost-effective for larger systems with large numbers of applicants.

## **Conditional Eligibility**

Conditional eligibility is sometimes used to reduce demand on the complementary paratransit service. As an example, in communities with severe winter weather, users may be eligible to use the service during the winter but must use fixed-route service during the summer. In Imperial County, factors might include heat or lack of accessible pedestrian facilities. This strategy has not been recommended because of the additional workload to track conditional eligibility, and the relatively small number of users who might be given conditional eligibility.

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# Appendix A: Questions for Case Studies

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## Questions for Case Studies

Initial research was completed using the agency website to obtain as much information as possible. The following questions were then used to verify the information or obtain any missing information.

1. What is the process for determining eligibility for ADA paratransit? [or confirm the process as described on the agency's website]
2. Please provide a copy of your application form and certification forms. [or confirm that we have the current download application and related forms from agency website]
3. Do you require professional verification of disability by a licensed healthcare provider? [this may be described on the agency's website or through the application materials, so should involve confirming the online information]
4. What is the process for reviewing applications? Who reviews the application and related forms? Are there specific criteria used to determine eligibility?
5. How much time does each person involved in the review spend weekly on this process?
6. How long does the process take in general to review and certify individuals once they have submitted their initial paperwork?
7. Do you conduct personal interviews for applicants? If so, what is the format of the interview and how is it used to determine eligibility? Is the interview in person or by telephone? Who conducts the interview (agency staff or an outside organization)? If in-person, where is the interview conducted (at your agency or other location(s))?
8. Do you conduct any type of functional assessment? If so, is this done in-house or by an outside organization? What is done and where do the assessments take place? Do you follow the Project Action guidance for the assessments? If an outside organization is used, how is that organization paid for its services? What are the costs (per interview, per assessment, per contracted therapist, etc.)?
9. For your in-house staff involved in the eligibility/certification process, are there any special requirements or training provided for those positions?
10. Do you use any type of conditional eligibility? If so, what conditions do you consider? Do you then screen trips for these conditions for trips requested by the conditionally eligible riders? [Note: our recent TCRP study found that many agencies grant conditions during the certification process but not many actually screen trips through trip-by-trip procedures. Some agencies will enforce things like seasonal conditions, but few make trip-by-trip decisions in operations.]

11. Do you require recertification? If so, what is the recertification interval? Must riders recertifying go through the full certification process? Are there differences in recertification depending on the type of disability?
12. Are there any issues in the eligibility/certification process regarding applicants who have limited English proficiency? E.g., have you found that you use different procedures or modify procedures (other than translation) for such applicants? Has the ESL community/advocates expressed any particular concerns regarding the eligibility/certification process?
13. Please provide us with an estimated cost for these processes. (Cost of staff largely or vendor invoices)
14. Have you made any changes to your process in the past three years? If so, what were you doing previously and what changes did you make?
15. Are you satisfied with your current process? Are there changes you are thinking about making?
16. Do you have any “lessons learned” through your agency’s experience with your ADA paratransit eligibility/certification process that would help other transit agencies considering revisions?
17. Do you use any strategies to encourage use of fixed-route service rather than paratransit? If so, what? [For example, free fare on fixed route; if you provide this, have you found the number of applicants increased with applicants wanting the free-fare benefit?]
18. Do you use any other strategies to reduce the demand for paratransit? If so, what?
19. What are your requirements or limitations for advance reservations? [If you have decreased the time period—e.g., from 14 days to 7 days in advance—has there been any notable change in the number of advanced or late cancellations? Or no-shows?]

## Appendix B: IVT Access Website Checklist

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## IVT Access Website Checklist

IVT Access is the federally-mandated Americans with Disabilities Act (ADA) paratransit service for Imperial Valley Transit (IVT), the regular fixed-route bus service. IVT Access is provided to individuals who have disabilities that prevent use of IVT fixed-route bus service and who have been certified as eligible for IVT Access.

To be eligible for IVT Access you must apply through ICTC. Before submitting your application, please consider the following factors:

1. Are you able to use IVT fixed-route bus service?
2. Do you require a mobility aid or equipment such as a wheelchair or walker to travel outside your home?
3. Would you be able to ride the bus if you received free training on how to use the bus?
4. Are you able to get to and from the bus stop by yourself?
5. Are you able to walk four blocks or one quarter mile by yourself?
6. Are you able to wait outside up to 15 minutes at a bus stop?
7. Are you able to get on and off the bus either using the steps, a ramp, or a lift?
8. Are you able to understand how to use the fixed-route bus?

If you answered “no” to one or more of these questions, you may be eligible to use IVT Access for your transportation. There are three steps to apply for eligibility to use IVT Access:

- (1) Complete the Eligibility Questionnaire; see attached.
- (2) Have the healthcare professional who is most knowledgeable about your disability and its impacts on your ability to use public transportation complete the Healthcare Professional Verification Form.
- (3) Complete an in-person interview with staff of Imperial County Transportation Commission (ICTC). Once the Eligibility Questionnaire and Healthcare Professional Verification Form are both completed, contact ICTC to schedule the in-person interview. You can contact ICTC by phone at \_\_\_\_\_ or email at \_\_\_\_\_. You need to bring the two completed forms with you to the in-person interview.

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## Appendix C: Script for Receptionist

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## **Script for Receptionist**

This script is to be followed when a call is received or a person comes to the ICTC office to request application forms for IVT Access.

Ask the applicant:

“Have you looked at the information on our website?”

If the applicant responds “yes,” ask:

“Have you looked at the checklist to determine if you may be eligible for IVT Access?”

If the applicant has not looked at the website, provide the following information and ask them to consider the following questions to help determine if they are eligible for IVT Access.

“IVT Access is the federally-mandated Americans with Disabilities Act (ADA) paratransit service for Imperial Valley Transit (IVT), the regular fixed-route bus service. IVT Access is provided to individuals who have disabilities that prevent use of IVT fixed-route bus service and who have been certified as eligible for IVT Access.

1. Are you able to use IVT fixed-route bus service?
2. Do you require a mobility aid or equipment such as a wheelchair or walker to travel outside your home?
3. Would you be able to ride the bus if you received free training on how to use the bus?
4. Are you able to get to and from the bus stop by yourself?
5. Are you able to walk four blocks or one quarter mile by yourself?
6. Are you able to wait outside up to 15 minutes at a bus stop?
7. Are you able to get on and off the bus either using the steps, a ramp, or a lift?
8. Are you able to understand how to use the fixed-route bus?”

If the applicant answers “no” to any question, then proceed to the following questions. If there are no negative responses, state the following:

Let me explain the process for determining if you are eligible. If you desire to apply to use IVT Access, I will provide you with the information to start the process.

“There are three steps to apply for eligibility to use IVT Access:

- (1) Complete the Eligibility Questionnaire; see attached.
- (2) Have the healthcare professional who is most knowledgeable about your disability and its impacts on your ability to use public transportation complete the Healthcare Professional Verification Form.
- (3) Complete an in-person interview with staff of Imperial County Transportation Commission (ICTC).”

For all applicants who consider themselves eligible and desire to apply, continue with the following statements and questions.

“Please be aware that IVT Access only serves those areas that are also served by IVT buses. IVT Access may not meet all of your transportation needs.”

“Are you aware that we offer free training on how to use IVT buses?”

If the applicant answers “no,” explain the travel training program:

“Our trainer will meet with you and explain how to understand the bus schedule, how to board the bus, how to let the driver know where you need to get off, and how to get off the bus. The trainer will then take you on a trip on the bus to any destination you choose that we serve. If you participate in travel training and learn how to ride the bus, this does not mean that you will be denied eligibility for IVT Access.”

If the applicant is interested in travel training, schedule a time for the training.

If the applicant desires to apply for IVT Access certification, ask if they would prefer to receive the application packet by email, regular mail, or pick it up in person at the ICTC office. Obtain the correct information and send the packet.

## Appendix D: Application Forms and Information Brochure

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**DRAFT**

## **IVT Access Application – Cover Letter**

Dear Interested Applicant:

Thank you for inquiring about IVT public transit services and our service for people who have disabilities. We offer the following services:

- **IVT Fixed-Route Bus Service:** Our fixed-route bus service is fully accessible to people with disabilities. All our buses are equipped with ramps or lifts for people who use wheelchairs and scooters. All buses also have a “kneeling” feature that lowers the bus closer to the ground to help people who have difficulty climbing stairs. There is priority seating right behind the bus driver for people with disabilities and seniors. Bus drivers call out stops and major transfer points.
- **IVT Access:** This is the federally-mandated Americans with Disabilities Act (ADA) paratransit service, which is an advance-reservation, shared-ride service for people who have a disability that prevents use of fixed-route service. To use IVT Access, a person must be certified as eligible.
- **Travel training:** We offer assistance and training to those interested in learning how to ride the fixed-route buses. The training is free! Please contact us at \_\_\_\_\_ or \_\_\_\_\_ if you would like to learn how to ride IVT buses.

Enclosed is the IVT Access Application, which consists of two forms: the **Eligibility Questionnaire** form and the **Healthcare Professional Verification** form. If you are interesting in applying for eligibility, please read this introductory letter and all of the enclosed materials before starting.

## How is Eligibility Determined?

To determine if you are eligible to use IVT Access, you must do the following:

- 1) Complete the **Eligibility Questionnaire** form.
- 2) Fill out the first part of the **Healthcare Professional Verification** form and then submit the form to your healthcare professional, who must verify that your disability affects your ability to use public transportation. Have your healthcare professional send the form back to you once completed.
- 3) Once you have completed the Eligibility Questionnaire form and have received back the completed Healthcare Professional Verification form from your healthcare professional, contact us by email \_\_\_\_\_ or telephone \_\_\_\_\_ to schedule your required in-person interview. All new applicants for IVT Access are required to have an in-person interview. Those already eligible who are re-certifying may also need an in-person interview.
- 4) This required interview will take place at the office of \_\_\_\_\_, located at \_\_\_\_\_, with \_\_\_\_\_. The interview, which may last up to 60 minutes, provides the opportunity to discuss your mobility issues and for you to learn about all IVT services, including accessible fixed-route and travel training.
- 5) Transportation to \_\_\_\_\_ for the in-person interview is available through IVT bus service. Or if you need transportation to and from the in-person interview, please let us know when you call to schedule your interview. You may also take care of transportation on your own.

## In-Person Interview

Once your in-person interview is scheduled, please remember:

- Bring your completed Eligibility Questionnaire form and completed Healthcare Professional Verification form. Do not mail or fax your forms.
- If you use a mobility device when you travel outside the home, you must bring that mobility device with you to your in-person interview.

- You will have a photo taken at the interview, which will be used for an ID card if you are determined to be eligible for IVT Access.
- If you find that you cannot make your scheduled in-person interview, please contact us to cancel the appointment **before** the scheduled date. To cancel your in-person interview call \_\_\_\_\_.

## **Determining Eligibility**

Based on your completed Eligibility Questionnaire, your completed Healthcare Professional Verification form, and the in-person interview, ICTC will determine if you are eligible for IVT Access within 21 calendar days. If your two forms are not complete, we will return the forms to you which will delay processing.

Based on the determination, you will be provided with one of the following:

- **Unconditional Eligibility:** A disability or health condition always prevents use of the fixed-route buses and IVT Access is provided for all trips.
- **Temporary Eligibility:** A disability or health condition temporarily prevents use of the fixed-route buses and IV Access is provided only during that time period.
- **Referral to Fixed-Route Service:** If you are determined to be able to use fixed-route service, you will be referred to IVT's fixed-route service and provided information about schedules and routes as well as travel training. You will also be given information about applying for IVT's half-fare program. People with disabilities and seniors age 60 and older are eligible to ride for half-fare on IVT buses.

If we determine you are able to use fixed-route and therefore not eligible for IVT Access, we will notify you of the reason(s). You may appeal the decision, and we will send you information on the appeal process with the determination letter.

If you have questions about the Application forms or need assistance in completing them, please contact \_\_\_\_\_ at \_\_\_\_\_ or by e-mail at \_\_\_\_\_. This letter and the Application, with the two forms, are also available in large print and other alternative formats upon request.

Thank you for your interest in IVT public transit services!

## **IVT Access Application**

**IVT Access is the federally-mandated Americans with Disabilities Act (ADA) paratransit service for Imperial Valley Transit (IVT), the regular fixed-route bus service. IVT Access is provided to individuals who have disabilities that prevent use of IVT fixed-route bus service and who have been certified as eligible for IVT Access.**

**There are three steps to apply for eligibility to use IVT Access:**

- (1) Complete the Eligibility Questionnaire; see attached.**
- (2) Have the healthcare professional who is most knowledgeable about your disability and its impacts on your ability to use public transportation complete the Healthcare Professional Verification Form.**
- (3) Complete an in-person interview with staff of Imperial County Transportation Commission (ICTC). Once the Eligibility Questionnaire and Healthcare Professional Verification Form are both completed, contact ICTC to schedule the in-person interview. You can contact ICTC by phone at \_\_\_\_\_ or email at \_\_\_\_\_. You need to bring the two completed forms with you to the in-person interview.**

**Questions?** If you have questions about the Application Process or need assistance in completing the two forms, please contact ICTC at \_\_\_\_\_



# ELIGIBILITY QUESTIONNAIRE

Office Use Only:  
New \_\_\_\_ Recert \_\_\_\_

## Section I. General Information

Last Name \_\_\_\_\_ First Name \_\_\_\_\_ Middle Initial \_\_\_\_

Address \_\_\_\_\_ Apartment # \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Phone--Daytime \_\_\_\_\_ Phone--Evening \_\_\_\_\_

Cell Phone \_\_\_\_\_ E-Mail Address \_\_\_\_\_

Emergency Contact Name \_\_\_\_\_ Phone \_\_\_\_\_

Date of Birth \_\_\_\_/\_\_\_\_/\_\_\_\_ Male ☐ Female ☐

Are you affiliated with a human service agency or other agency that serves people with disabilities? ☐ Yes ☐ No If Yes, please give us information about that agency:

Agency Name \_\_\_\_\_

Agency Address \_\_\_\_\_

Agency Phone Number \_\_\_\_\_ Point of Contact \_\_\_\_\_

## Section II. Disability and Mobility Information

1. Please provide a description of your disability that affects your ability to use the IVT accessible fixed-route bus service:

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2. Is your disability described above?.... (check only one)

☐ Permanent

☐ Temporary If temporary, how long do you expect it to last? \_\_\_\_ months.

☐ I don't know

3. Does your disability change from day-to-day under certain circumstances?

☐ No ☐ Yes

How? \_\_\_\_\_

4. Which of the following mobility aids or equipment do you use when traveling to destinations outside of your home?

☐ None ☐ Walker ☐ White Cane  
☐ Manual Wheelchair ☐ Cane ☐ Service Animal  
☐ Electric Wheelchair ☐ 3 or 4-Wheel Scooter ☐ Portable Oxygen  
☐ Other (please specify) \_\_\_\_\_

**Important Note:** IVT ACCESS can accommodate a wheelchair or scooter only if it is no longer than 48 inches, no wider than 30 inches, and if the total weight is not more than 600 pounds when occupied.

5. Do you use IVT's accessible fixed-route bus service?

☐ Yes ☐ Sometimes ☐ No

☐ I used the bus in the past, but stopped because....

6. Please describe why your disability prevents you from using the IVT accessible fixed-route bus service.

7. If training was available to help you learn how to ride the bus, would you be interested? The training is free! ☐ Yes ☐ Maybe ☐ No

8. Do you have an aide or personal care attendant (PCA) who travels with you to destinations outside of your home?

☐ Always ☐ Sometimes ☐ Never

9. Are you able to get to and from the bus stop by yourself?

☐ Yes

☐ No

If No, why not? \_\_\_\_\_  
\_\_\_\_\_

10. How far can you continuously walk by yourself or with the assistance of your mobility aid? (for example, one mile, one-half mile, for 15 minutes)

\_\_\_\_\_

11. Can you wait outside at a bus stop?

☐ Yes, I can wait by myself for 10 to 15 minutes.

☐ I can wait by myself for 10 to 15 minutes only if I have a seat and shelter.

☐ No; why not? \_\_\_\_\_  
\_\_\_\_\_

12. Are you able to get on and off of the fixed-route bus by yourself?

☐ Yes

☐ Yes, but only if the bus has a ramp or wheelchair lift.

☐ No; why not? \_\_\_\_\_  
\_\_\_\_\_

13. Are you able to ask for and follow written or verbal instructions about how to use the fixed-route bus?

☐ Yes, by myself.

☐ I probably could with specific instruction.

☐ No, I get too confused and might get lost.

14. If you are able to get on and off of the bus, do you know where to get off the bus, and find your way to your destination by yourself?

☐ Yes

☐ I can if the driver calls out the stops.

☐ I probably could with training.

☐ No, I get confused and can't remember where I am going.

### Section III. Primary Travel Destinations

Please list the three places you go to most often and how you get there now.

(1) Where do you go? \_\_\_\_\_

Address: \_\_\_\_\_

How often do you go there? \_\_\_\_ times per week or \_\_\_\_times per month.

How do you get there now? \_\_\_\_\_

(2) Where do you go? \_\_\_\_\_

Address: \_\_\_\_\_

How often do you go there? \_\_\_\_ times per week or \_\_\_\_times per month.

How do you get there now? \_\_\_\_\_

(3) Where do you go? \_\_\_\_\_

Address: \_\_\_\_\_

How often do you go there? \_\_\_\_ times per week or \_\_\_\_times per month.

How do you get there now? \_\_\_\_\_

## **Section IV. Signature**

### **Applicant's Signature**

I understand that the purpose of the Application is to determine if I am eligible for IVT Access. I certify that the information I gave in this application is true and correct and that the Application will be returned to me if not complete, which delays processing. I understand that falsification or misrepresentation of facts may result in denial of service.

I also understand that if I am not found to be eligible for the ADA paratransit service, I may appeal the determination within 60 days of the date of the denial letter. I will be advised of the procedures for such an appeal. I authorize the certifying agency to contact any agency or professional indicated on this form, by narrative or by attachment, if necessary to verify the nature and duration of my disability.

I understand that additional information from my healthcare professional related to my disability or medical condition is required and may be used to help determine my eligibility.

Signature of Applicant: \_\_\_\_\_ Date: \_\_\_\_\_  
(Applicants must be 18 years of age to sign independently. Otherwise, the signature of a guardian is required.)

### **Applicant's Representative**

If someone other than the applicant has completed this Application, the following information must be provided:

Name: \_\_\_\_\_  
Daytime Telephone Number: \_\_\_\_\_  
Relationship to Applicant: \_\_\_\_\_ Date: \_\_\_\_\_

## HEALTHCARE PROFESSIONAL VERIFICATION FORM

### Instructions for the Applicant

1. Complete and sign **Section A, “Authorization to Release Information.”**
2. Then send or give this form to your healthcare professional who is most familiar with your disability and its impacts on your ability to use public transit. Your healthcare professional will need to fill out **Section B**. The following are the types of healthcare professionals who would qualify.

Family Physician  
Physical Therapist  
Occupational Therapist  
Case Manager

Ophthalmologist  
Rehabilitation Specialist  
Licensed Social Worker  
Orientation & Mobility Specialist

Registered Nurse  
Psychiatrist  
Psychologist

3. Wait for the healthcare professional to return the completed Healthcare Professional Verification form to you. Check back with your professional if you don't receive your form in a timely manner.
4. Once you have completed the Eligibility Questionnaire and have received back the completed Healthcare Professional Verification form from your healthcare professional, contact ICTC by email \_\_\_\_\_ or telephone \_\_\_\_\_ to schedule your in-person interview.

## Section A. Authorization to Release Information

*(applicant to complete Section A and sign, then send to the professional you select)*

Applicant's Name \_\_\_\_\_

Date of Birth \_\_\_\_\_

Applicant's Address \_\_\_\_\_

Applicant's Telephone Number \_\_\_\_\_

I authorize the following professional to release to ICTC specific information as requested. It is my understanding that the information released will be used solely to determine my ADA paratransit eligibility. I understand that I may revoke this authorization at any time. Unless revoked, this form will allow that professional listed below to release information described for 90 days after the date appearing below.

Name of Professional: \_\_\_\_\_ Title: \_\_\_\_\_

*Applicant's Signature:* \_\_\_\_\_ *Date:* \_\_\_\_\_

Guardian's Signature required if applicant is not his/her own guardian.

*Guardian's Signature:* \_\_\_\_\_ *Date:* \_\_\_\_\_

## Section B: Healthcare Professional Verification

Dear Healthcare Professional:

You are being asked to provide information regarding this individual's disability. The individual is applying for Americans with Disabilities Act (ADA) paratransit eligibility. The law specifies that ADA paratransit eligibility is provided only to those individuals who (1) as a result of their disability, cannot board, ride or disembark from a regular fixed-route bus or (2) have a specific impairment-related condition that prevents them from getting to or from a bus stop.

This is not intended as verification of the applicant's disability or medical condition but to determine the effect of that disability or medical condition on the individual's ability to independently use regular, fixed-route bus service.

Please know that the Imperial Valley Transit (IVT) regular fixed-route bus service is fully accessible to people with disabilities. All fixed-route buses are equipped with ramps or lifts for people who use wheelchairs/scooters. All buses also have a "kneeling" feature that lowers the bus closer to the ground to help people who have difficulty climbing steps. Those who cannot climb steps can use the ramp or lift so there are no steps to negotiate. There is priority seating behind the bus driver for people with disabilities and seniors. There are designated positions on each bus for riders who use wheelchairs or scooters, and bus drivers provide assistance with securement of the mobility device. Bus drivers also call out stops and major transfer points to help riders locate their stops and destinations.

## General Questions

1. In what capacity do you know the applicant? \_\_\_\_\_

2. What is the diagnosed disability or medical condition causing the disability that you are treating the applicant for?  
\_\_\_\_\_  
\_\_\_\_\_

3. What category (ies) is the applicant's disability? ☐ Physical ☐ Visual ☐ Cognitive

4. Is the disability ☐ temporary or ☐ permanent?

If temporary, how long do you expect it to last? \_\_\_\_\_

5. Does the applicant's disability or condition prevent use of using regular fixed-route bus service?

☐ No ☐ Sometimes ☐ Yes

If Sometimes or Yes, please explain why: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. Does the applicant use any mobility aids: ☐ No ☐ Yes

If Yes, what type:

☐ Manual Wheelchair ☐ Power Wheelchair ☐ Scooter ☐ Walker  
☐ Crutches ☐ Cane ☐ White Cane  
☐ Other; please specify \_\_\_\_\_

7. Does the applicant require a Personal Care Attendant (PCA) to travel in the community?

☐ No ☐ Yes ☐ Sometimes

## Effects of Applicant's Disability or Medical Condition on Community Travel

8. How far can the applicant walk/travel (with his or her mobility aid if applicable)?

☐ 3 blocks ☐ 6 blocks ☐ 9 or more blocks ☐ Less than 3 blocks

9. How long can the applicant wait outside (with his or her mobility aid if applicable)?

☐ 15 minutes ☐ 30 minutes ☐ Less than 15 minutes

10. Can the applicant negotiate hills or steep terrain? ☐ Yes ☐ No ☐ Sometimes

Please elaborate if necessary \_\_\_\_\_

11. Can the applicant cross the street without assistance? ☐ Yes ☐ No

If No, why not?: \_\_\_\_\_

12. Can the applicant recognize a destination or landmark?

☐ Yes ☐ No ☐ Sometimes

Please elaborate if necessary \_\_\_\_\_



13. Is the applicant able to ask for, understand, and follow directions?

☐ Yes ☐ No

Please elaborate if necessary \_\_\_\_\_

14. Is the applicant able to get around independently in the community?

☐ Yes ☐ No ☐ Sometimes

Please elaborate if necessary \_\_\_\_\_

**Additional Information**

Is there any other relevant information about the applicant's disability or medical condition affecting the applicant's mobility that would be helpful to ICTC in determining ADA paratransit eligibility?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I hereby affirm that the information I provided herein is true and correct to the best of my knowledge.

**Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

Please print your name and title

\_\_\_\_\_

**License Number** \_\_\_\_\_ **Telephone** \_\_\_\_\_

Thank you for your help. If you have questions, please contact ICTC at \_\_\_\_\_ or by email at \_\_\_\_\_.

**Return the completed form to the applicant.**

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# Appendix E: Draft Scope of Services

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# **Request for Proposals**

## **Background**

ICTC is required by the Americans with Disabilities Act (ADA) to ensure the provision of complementary paratransit service to individuals whose disabilities prevent use of the IVT fixed-route service. The ADA further requires that ICTC establish a process for determining ADA paratransit eligibility. This process, according to ADA regulations, “shall strictly limit ADA paratransit eligibility to individuals specified” in the regulations:

- (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 individuals with disabilities. [§37.123(e)(1)]
- (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 on 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. [§37.123(e)(2)]
- 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. [§37.123(e)(3)]

ICTC has recently revised the process for certification of individuals for ADA complementary paratransit eligibility. The process consists of a two-part application form (personal and professional verification forms), an in-person interview, and, as needed, an in-person functional assessment. The forms currently used are included as Attachments A and B.

The process also includes an initial telephone call to ICTC to request the verification forms.

When the application is complete, the applicant is scheduled for an in-person interview by ICTC staff. ICTC has not conducted functional assessments in the past and is implementing this step as part of the revised process. ICTC staff will make an initial determination of eligibility based on the verification forms and the in-person interview. If a functional assessment is needed based on the initial determination, the applicant will be scheduled for the assessment with the contractor. ICTC will arrange for transportation to and from the assessment appointment if needed. If a functional assessment is needed, it will need to be scheduled and conducted within no more than two weeks of the initial determination in the interview.

In [insert most recent year], ICTC averaged [insert number of applications] new applications. Of these, it is estimated that 50 percent will require a functional assessment. [add something about recertifications, as functional assessments may be needed sometimes] An average of [insert number] individuals are asked to go through the process to recertify their eligibility each month and of these [insert number] may require a functional assessment.

## **Requirements**

Of particular importance is the ability to make determinations about eligibility based on functional ability to board, disembark, and access transportation in accordance with ADA criteria. Experience providing evaluations within regulatory parameters for state or federal entities is preferred. Familiarity with a wide range of medical conditions and their impact on functional capabilities is required.

Proposers must possess the following qualifications:

- Knowledge and experience working with aspects of the ADA and public accommodations.
- The ability to make determinations about ADA eligibility based on ADA criteria.
- The ability to work well with individuals who have a wide range of mobility needs.
- The ability to identify the functional impact of physical and cognitive impairments of individuals.
- The ability to understand the impact of a wide range of medical conditions on the functional ability of individuals to use public transportation.
- Ability to assess the interaction of an individual's disabilities with the various components of a transit system required for successful access and use of fixed-route services, fare boxes, timetables and route descriptions.
- Familiarity with the IVT fixed-route service.
- Sensitivity to persons with disabilities including physical, cognitive, and psychiatric disabilities.
- Fluency in Spanish and English for employees interacting with applicants.

Staff conducting interviews and performing evaluations should have appropriate experience and professional training in the human health and medical fields. Such staff may include, but not be limited to, certified physical therapists, occupational therapists, rehabilitation specialists, orientation and mobility specialists, and professionals with training in cognitive and psychiatric impairments.

ICTC expects the highest quality of service in connection with the assessments. ICTC may determine that a person performing services under their contracts is not adequately qualified or properly trained and may direct the Contractor to remove such persons from work on their contracts.

## **Scope of Work**

In order to ensure that only those who meet the eligibility criteria as defined by the ADA are certified as ADA paratransit eligible, ICTC is requesting proposals for its in-person functional assessments. The goals of this contract are to ensure access to the ADA paratransit program for eligible persons, to support the use of fixed-route service for persons who are able to use it for some or all of their transportation needs, and to provide a fair and equitable process for recommending ADA paratransit eligibility. Paratransit eligibility shall be based on ADA regulations.

Paratransit eligibility shall be based on a functional rather than medical model. Persons shall not be qualified or disqualified on the basis of a specific diagnosis or disability alone. An applicant shall be certified as eligible if, and only if, a person's functional disability prevents the use or navigation of IVT fixed-route services. The goal of the contractor is to ensure that only applicants who meet the eligibility criteria are enrolled for paratransit services.

ICTC requests proposals to provide evaluation services with the following scope of work. The Contractor shall perform functional assessments of applicants as part of the ADA Paratransit eligibility process. The Contractor shall make determinations about ADA eligibility based on functional ability to negotiate the fixed-route system in accordance with ADA criteria. Of particular importance is the ability to make

determinations about eligibility based on the ADA paratransit riders' functional ability to get to, board, and ride fixed-route services.

The Contractor shall coordinate with ICTC staff to schedule and conduct in-person interviews with applicants, review applications, and follow-up with each applicant's designated physician as needed. Proposers may suggest an alternative procedure to achieve a similar outcome if appropriate.

The Contractor shall determine whether and under which of the ADA-defined eligibility criteria (described herein) an applicant is eligible, any conditions of eligibility that determine whether the duration of eligibility is permanent or temporary, and, if temporary, the eligibility expiration date. The Contractor shall also determine the need for an applicant to travel with a personal care attendant in order to successfully complete a paratransit trip.

## **ADA Paratransit Eligibility Requirements**

The Americans with Disabilities Act (ADA) is quite specific in defining who is eligible for this specialized service. A person must have an actual physical, visual, or mental functional limitation which causes him or her to be unable to use accessible fixed-route transportation. The diagnosis of a potentially limiting illness or condition is not sufficient for paratransit eligibility. The ADA law says the following factors must be considered in determining ADA paratransit eligibility:

1. A person's disability and functional abilities.
2. Accessibility of the fixed-route system.
3. Architectural barriers.
4. Environmental conditions.

An individual is eligible to use paratransit services if they fall into one of the following categories:

1. You are unable to use the fixed-route system. You are unable to independently board, ride, or disembark from the fixed-route some or all of the time.
2. The fixed-route system is not accessible. You are functionally able to independently navigate, board, ride, and disembark the fixed route, but there are no accessible vehicles on the route providing service to a particular destination.
3. You are not able to independently get to or from the system. You have a specific impairment-related condition that prevents you from traveling to or from a bus stop some or all of the time.

## **General Responsibilities of the Contractor**

The Contractor shall be responsible for:

1. Providing all necessary office equipment to execute the contract including but not limited to fax machine, office equipment, and supplies.
2. Providing adequate and appropriate space for completing the functional assessments, including indoor and outdoor space. The indoor space must be accessible, include an accessible restroom, and be within one-quarter mile of an IVT fixed-route bus stop with an accessible pedestrian pathway to and from that bus stop.
3. As determined by the Contractor, props to conduct the evaluations may also be necessary. For example, the Contractor may want to have props that simulate use of fixed-route transit, such as a simulated bus lift or ramp. The Contractor should indicate what props will be provided as part of the proposal.
4. Coordinating with ICTC staff to schedule the appointment and transportation.

5. Contacting the applicant one day in advance of the scheduled assessment appointment to remind the applicant of the appointment and the pick-up time.
6. Conducting specific in-person physical, visual, and cognitive evaluations of applicants to determine eligibility for ADA paratransit service.
7. Making recommendations to ICTC regarding the eligibility of applicants and a written assessment on the length of time the applicant is eligible if the recommendation is for temporary eligibility.
8. Providing information or other assistance to ICTC regarding any appeals of eligibility determination.
9. The Contract Manager will meet with ICTC on an as-needed basis for the purpose of discussing service problems and proposed solutions, and to maintain open and frequent communications.
10. The Contractor shall provide ICTC with a detailed monthly invoice indicating the number of assessments completed, the outcomes of the assessments, and the number of no-shows for appointments.
11. The Contractor shall submit the assessment determination report to ICTC within two business days of completing the assessment.

## **The Functional Assessment**

It is fully anticipated that entities without direct experience with ADA paratransit eligibility assessments are qualified to respond to this solicitation even if they have not done similar eligibility assessments. In order to learn more about what is involved in a functional assessment, proposers are encouraged to refer to the following link at PROJECT ACTION, which is a federally funded agency that has taken a lead in accessible transportation-related applied research: [www.projectaction.easterseals.com](http://www.projectaction.easterseals.com) (Free Resources/Download Free Publications/Paratransit Eligibility and Management/Document 04ELIG/"Determining ADA Paratransit Eligibility: An Approach, Guidance and Training Materials").

ICTC offers travel training for individuals to learn how to use the IVT fixed-route service. If an applicant is found to have the potential to use IVT with personalized training, that recommendation will be included in the eligibility determination submitted to ICTC.

Some applicants may be found to be unable to use IVT Access paratransit service due to the nature of their disability. The assessment should include a determination if a person requires a personal care attendant to use IVT Access or is unable to use IVT Access because of the level of care required during transportation.

Bidders with alternative methods of accomplishing the stated objective of the RFP are welcome to submit proposals. All forms and types of evaluation methods will be reviewed, as long as they consist of in-person assessments.