



F E D E R A L   T R A N S I T   A D M I N I S T R A T I O N

## **Guam Regional Transit Authority**

### **ADA Paratransit Compliance Review**

Final Report  
February 2021



U.S. Department of Transportation  
**Federal Transit Administration**

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- A FTA Notification Letter to Guam Regional Transit Authority
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## Executive Summary

### Objective and Methodology

This report details the results of a compliance review of the complementary paratransit service operated by the Guam Regional Transit Authority (GRTA) in Tamuning, GU. The review's objective is to verify whether GRTA is meeting its obligations under the Americans with Disabilities Act (ADA) to provide paratransit as a complement to its fixed route service.

This compliance review included three stages:

1. Preparation: compilation of information covering policies and procedures and interviews with eligible GRTA paratransit riders and local disability organizations
2. Site visit: a three-person review team's observations of GRTA's paratransit trip requests, including scheduling and dispatching, examination of eligibility applications and related documents (including appeals), and interviews with GRTA employees
3. Analysis and reporting: using site visit data, identification of deficiencies requiring corrective actions and suggestions of effective practices in complementary paratransit service

### Key Findings

GRTA's complementary paratransit service includes the following positive program elements:

#### **Positive Program Elements**

- GRTA's paratransit system serves all destinations on Guam, beyond 3/4-mile of its bus routes
- Based on an analysis of a sample of completed trips, GRTA's on-time pickup performance is over 90 percent. Less than two percent of pickups are more than more than 15 minutes late
- Based on an analysis of a sample of long paratransit trips, travel times are shorter than travel times of comparable fixed route trips

GRTA has the following administrative deficiencies that are easily correctable to bring its program into compliance with 49 CFR Parts 27, 37 and 38:

#### **Administrative Deficiencies**

- GRTA is not keeping a record of ADA-related complaints for paratransit service to for the required five years
- GRTA's paratransit eligibility appeal process does not allow for separation of functions
- GRTA's requirements for documentation from visitors who do not have credentials from another paratransit system are incorrectly stated in public information materials
- GRTA improperly requires that a rider with an oxygen tank ensures that the tank is 3/4-full

GRTA has the following substantive deficiencies need to be addressed to bring its program into compliance with 49 CFR Parts 27, 37 and 38:

**Substantive Deficiencies**

- GRTA confers unconditional and conditional eligibility on the basis of specific disabilities or medical conditions, rather than on functional ability to use fixed route service
- Fewer than half of paratransit eligibility applications in a sample of 19 were processed in 21 days or less; presumptive eligibility after day 21 is not automatic
- GRTA's scheduling procedures have led to denials
- GRTA does not accept trip requests with pickup times within an hour of the end of the service hours of its fixed route bus service
- GRTA's policies and procedures for determining a pattern or practice of no-shows and procedures for appealing a suspension of service are not consistent. Riders are subject to suspension for an indefinite period of time in some circumstances

Please see Section 6 for a discussion of all 27 deficiencies. The Summary Table of Compliance Review Findings (following Section 6) lists all findings. Unless otherwise stated, GRTA must address all deficiencies within 60 days of receipt of this report.

## 1 General Information

This chapter provides basic information concerning this compliance review of GRTA. Information on GRTA, the review team, and the dates of the review is presented below.

<b>Grant Recipient:</b>	Guam Regional Transit Authority
<b>City/State:</b>	Tamuning, GU
<b>Recipient ID:</b>	1641
<b>Executive Official:</b>	Celestin C. Babauta, Interim Executive Manager
<b>On-site Liaison:</b>	Celestin C. Babauta, Interim Executive Manager
<b>Report Prepared By:</b>	the Collaborative, Inc.
<b>Dates of On-Site Visit:</b>	March 3-6, 2020
<b>Review Team Members:</b>	David Chia, the Collaborative, Inc. Ed Shoucair, the Collaborative, Inc. Patti Monahan, the Collaborative, Inc.

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## 2 Jurisdiction and Authorities

Public entities that operate fixed route transportation services for the general public are required by the U.S. Department of Transportation (DOT) regulations implementing the Americans with Disabilities Act of 1990 (ADA) to provide ADA complementary paratransit service for persons who, because of their disability, are unable to use the fixed route system. These regulations (49 CFR Parts 27, 37, 38, and 39) include eligibility requirements and service criteria that must be met by ADA complementary paratransit service programs. Section 37.135(d) of the regulations required that ADA complementary paratransit service met these criteria by January 26, 1997.

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the ADA and the DOT regulations implementing the ADA.

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## **3 Purpose and Objectives**

This chapter discusses the purpose and objectives of an FTA ADA complementary paratransit compliance review and the review process.

### **3.1 Purpose**

Pursuant to 49 CFR §§27.19 and 27.123, as part of its oversight efforts, the FTA, through its Office of Civil Rights, conducts periodic reviews of fixed route transit and ADA complementary paratransit services operated by its grantees. Compliance with all applicable requirements of the Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. 12101–12213) including the DOT’s ADA regulations is a condition of eligibility for receiving federal financial assistance.

### **3.2 Objectives**

The primary objective of this paratransit review is to verify whether a public operator of a fixed route transit system that benefits from FTA funding is meeting its obligations under the ADA to provide paratransit as a complement to its fixed route service. This review examines the policies, procedures, and operations of GRTA’s ADA complementary paratransit system concerning service provision, including origin-to- destination service; eligibility, including the process used to determine who is eligible for the service; receiving and resolving complaints; and meeting the ADA complementary paratransit service criteria as specified in 49 CFR §37.131.

The review team observed dispatch, reservations, and scheduling operations, and analyzed service statistics, basic service records, and operating documents. To verify the accuracy of the public operator’s reported information and evaluate its methodology, the review team also conducted its own independent analysis of sample data. In addition, FTA solicited comments from eligible riders and from local disability organizations.

This report will summarize findings and advisory comments. Findings of deficiency require corrective action and/or additional reporting. Advisory comments are statements detailing recommended or suggested changes to policy or practice to ensure effective practices under the ADA.

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## 4 Introduction to Guam Regional Transit Authority

The Guam Regional Transit Authority (GRTA) provides fixed route bus and ADA complementary paratransit service throughout Guam. Guam is an organized territory of the United States. GRTA is an entity of Guam's government. It has a five-member board of directors. GRTA's administrative office and garage are located at 542 North Marine Corps Drive, Tamuning.

GRTA contracts with Kloppenburg Enterprises, Inc. (KEI) to provide fixed route bus service. Starting in January 2020, GRTA began directly operating its ADA complementary paratransit service.

GRTA's operating budget for fiscal year (FY) 2020 is approximately \$2.78 million, slightly higher than the FY 2019 operating budget of approximately \$2.7 million (fiscal year runs from October to September). The operating budget in FY 2018 was \$3,746,416. In recent years, 70–80 percent of funding came from local sources, with the balance coming from federal subsidies.

GRTA's fixed route service consists of seven bus routes, each using one bus. Service operates Monday–Saturday except certain holidays. Base fare for bus service is \$1.50, with discounts for multiple rides. Fixed route ridership in FY 2019 was 104,535 passenger trips (FTA National Transit Database).



For more information on GRTA, go to <http://www.grta.guam.gov>

### 4.1 Introduction to Paratransit Services

GRTA provides ADA complementary paratransit service throughout the entire island. Paratransit service is only for individuals certified as ADA-eligible, along with their personal care attendants (PCAs) and companions.

As shown in Table 4.1, in FY 2019, there were 46,322 ADA paratransit riders (including personal care attendants and companions). In terms of weekly ridership, this is approximately 900 trips. This was a 3.1 percent decrease in ridership from the prior fiscal year.

**Table 4.1 – GRTA ADA Paratransit Ridership**

<b>Fiscal Year</b>	<b>Total Passengers</b>	<b>Weekly Passengers</b>	<b>Annual Ridership Change</b>
2016	46,832	901	—
2017	55,898	1,075	19.4%
2018	47,808	919	-14.5%
2019	46,322	891	-3.1%
2020	42,849	824	-7.5%

As mentioned above, GRTA began to directly operate paratransit service in January 2020. Previously, it had contracted with KEI. Eligibility determination, planning, and overall management for paratransit take place at GRTA’s administrative office. Reservations, scheduling, dispatching, driver check-in, and driver training take place at the Transit Management Center (TMC), which is in building adjacent to the administrative office.

The paratransit fleet consists of seven active vehicles: a combination of small buses and MV-1 vans.

The paratransit fleet consists of 15 active vehicles. This includes eight MV-1 vans, which contain four seats and one wheelchair positions and are equipped with ramps: five from model year 2014 and three from model year 2015. The fleet also includes seven 2015 ARBOC 14-passenger cutaway buses equipped with lifts. Another four MV-1s and four ARBOCs are currently not in service due to varying degrees of disrepair.

GRTA owns the vehicles. Vehicle maintenance is performed by a contractor and overseen by the GRTA maintenance supervisor.

## 5 Scope and Methodology

The purpose of this review is to provide FTA with a tool for determining whether a public operator of a fixed route system is in compliance with the paratransit requirements under DOT ADA regulations. However, the deficiencies identified, and findings made in this report are by necessity limited to the information available to and the observations made by the review team at the time of the site visit. A lack of findings in a particular review area does not constitute endorsement or approval of an entity's specific policies, procedures, or operations; instead, it simply indicates that no deficiencies in the delivery of service were observed at the time of the review.

The scope of the review and the methodology employed by the review team is described in greater detail below.

### 5.1 Scope

The review focused on whether GRTA's ADA complementary paratransit service operates according to the service criteria specified in 49 CFR §37.131 of the DOT ADA regulations, and without capacity constraints prohibited under 49 CFR §37.131(f). The review examined GRTA's service area, response time, fares, and hours and days of service, as well as GRTA's policies, standards, and procedures for monitoring service provision, including on-time performance, on-board travel time, telephone hold times, and avoiding trip denials and missed trips. The review seeks to ascertain whether service is being provided to eligible individuals within at least the minimum required service area on a next-day basis, during the same hours and days as the fixed route system, for not more than twice the fixed route fare for the same trip; whether there are patterns or practices that result in a substantial number of trip limits, trip denials, untimely pickups, or trips of excessive length; policies that cause riders to arrive late to appointments; or long telephone hold times, as defined by the transit agency's established standards (or typical practices if standards do not exist).

Overall, the complementary paratransit review included the following regulatory requirements:

- Complaint resolution and compliance information (49 CFR §§27.13(b), 27.121(b), and 37.17)
- Nondiscrimination (49 CFR. §37.5)
- Service under contract (49 CFR §37.23) (if applicable)
- Requirement for comparable complementary paratransit service (49 CFR §37.121)
- ADA paratransit eligibility: Standards (49 CFR §37.123)
- Paratransit eligibility process (49 CFR §37.125) including:
  - Information is made available in accessible formats upon request
  - A decision is made within 21 days or presumptive eligibility is granted pending a decision
  - There is written notification of all decisions
  - All denials or conditional eligibility determinations are completed in writing with specific reasons for the decision

- There is an administrative appeals process for denials and conditional eligibility determinations
- Reasonable policies for suspending service to eligible riders who establish a pattern or practice of missing trips
- Complementary paratransit service for visitors (49 CFR §37.127)
- Types of service (49 CFR §37.129)
- Service criteria for complementary paratransit (49 CFR §37.131) including:
  - Service area
  - Response time
  - Fares
  - Trip purpose restrictions
  - Hours and days of service
  - Capacity constraints
- Subscription service (49 CFR §37.133) (if applicable)
- Training requirements (49 CFR §37.173)

## 5.2 Methodology

FTA's Office of Civil Rights sent a notification letter to GRTA's interim executive manager Celestin C. Babauta on November 8, 2019 confirming the dates for the review and requesting that information be sent to the review team in advance of the site visit (Attachment A).

Prior to the on-site visit, the review team examined the following service information:

- GRTA's description of how its complementary paratransit service is structured
- Public information describing GRTA's ADA complementary paratransit service
- GRTA's standards or goals for on-time performance, trip denials, missed trips, complementary paratransit trip length, on-time performance, and telephone hold times, which were contained in several documents in GRTA's response to FTA's November 8, 2019 letter

As requested by FTA, GRTA made additional information available during the visit:

- Copies of completed driver manifests for recent months
- Records of consumer comments and complaints related to capacity issues, including trip denials, on-time performance, travel time, and telephone access
- Procedures for addressing rider complaints and other incident reports
- Complaint recordkeeping processes
- A fleet roster of paratransit vehicles
- A listing of complementary paratransit drivers and their start dates
- Operating budgets, capital spending plans, and cost data

The on-site review of GRTA ADA complementary paratransit service took place from March 3–6, 2020. The visit began with an opening conference, held at 9 a.m. on Tuesday, March 3 at



GRTA's administrative office, 542 N. Marine Corps Drive, Tamuning. The following people attended the meeting:

- Celestin C. Babauta, Interim Executive Manager, GRTA
- Alejo C. Sablan, Board Chairman, GRTA
- John C. Leon Guerrero, Board Vice Chairman, GRTA
- Myra L. Hernandez, Board Secretary, GRTA
- Rally M. Pilipina, Chief Planner, GRTA
- Jacqueline Taitano, Paratransit Coordinator, GRTA
- Margaret B. Nauta, Transit Management Center Supervisor, GRTA
- Catherine T. C. Blas, Administrative Officer, GRTA
- David Chia, Review Team Leader
- Ed Shoucair, Review Team Member
- Patti Monahan, Review Team Member

Following the opening conference, the review team met with GRTA's interim executive manager and other GRTA managers to discuss the review team's planned set of activities for the week. The interim executive manager presented a history of GRTA's paratransit program, focusing on the transition to directly operated service. Team members also discussed the information provided by GRTA in advance of the site visit and began to follow up on a range of GRTA's paratransit policies and procedures. They also worked with GRTA staff to identify sample operations data available for analysis. One team member met with the GRTA staff member responsible for the eligibility determination process. In the afternoon, team members began to review GRTA service criteria, nondiscrimination policies, and performance standards. Team members went to the nearby Transportation Management Center (TMC) to listen to customer service representatives (CSRs) accept trip requests. The CSRs also shared dispatch responsibilities. A team member spoke to staff about GRTA's procedures for collecting and responding to rider complaints.

On Wednesday, March 4, team members again observed CSRs accept trip requests and dispatch vehicles. One team member spoke to several riders via telephone. A team member continued to review the eligibility determination process, including reviewing sample files of applicants for paratransit service. In the afternoon, team members interviewed four paratransit drivers. Team members also began analysis of sample trip data for on-time performance, travel times, and no-shows and missed trips.

On Thursday, March 5, a team member continued to gather information about the complaint procedures. A team member continued analysis of the sample trip data. A team member met with the primary scheduler to gather information about the trip scheduling process. Two team members met with the interim executive manager and other GRTA managers to discuss the budgeting process and the available resources for paratransit service. Team members also interviewed three additional drivers and met with the head of driver training.

On Friday, March 6, the review team continued to analyze data. They followed up on complaint records. They reviewed further operations and resource data. They prepared for the exit

conference, which took place at 1 p.m. at GRTA's administrative office. Attending the conference were:

- Celestin C. Babauta, Interim Executive Manager, GRTA
- Alejo C. Sablan, Board Chairman, GRTA
- John C. Leon Guerrero, Board Vice Chairman, GRTA
- Myra L. Hernandez, Board Secretary, GRTA
- Rally M. Pilipina, Chief Planner, GRTA
- Jacqueline Taitano, Paratransit Coordinator, GRTA
- Margaret B. Nauta, Transit Management Center Supervisor, GRTA
- Catherine T. C. Blas, Administrative Officer, GRTA
- Mark Crisostomo, Transportation Supervisor, GRTA
- Virgil Penafiel, Program Coordinator, GRTA
- David Chia, Review Team Leader
- Ed Shoucair, Review Team Member
- Patti Monahan, Review Team Member

GRTA was provided with a draft copy of the report for review and response. A copy of the correspondence received from GRTA on January 25, 2021, documenting their response to the draft report, is included as Attachment B.

### 5.3 Stakeholder Interviews

The review team interviewed five paratransit riders who have used the service at least for several years. In addition, one of these riders filed a formal complaint with FTA in 2018. The following is a summary of comments received:

**Eligibility.** No interviewee cited concerns with the initial eligibility determination process, or with the process for recertification. The rider who files the written complaint with FTA cited her service suspension that she believed was not justified.

**Telephone access.** Interviewees said that hold times for phone calls are no longer an issue as they were in the past. CSRs promptly field calls for service.

**Reservations, denials, and wait lists.** Riders said that they typically receive a call back the same day to schedule a ride and now nearly always get the time they want. One rider does not like the current call reservation system in which the rider calls GRTA to ask for a ride and then has to wait for a return call from another GRTA staff member to actually schedule the ride. The compliant cited past instances where she did not receive trips within 60 minutes of her requested time. She also cited instances of next-day service not being available for certain times of day.

**On-time performance.** Several interviewees noted that drivers were on time more frequently for pickups than in previous years. However, a few riders few said that occasionally there are missed times. For example, one rider said they had scheduled a ride one week in advance for a pick-up time of 10:00 a.m. and the driver arrived at 9:40 a.m. and left without waiting. The written complaint cited instances of both pickups and drop-offs sometimes being more than an hour late.

**Travel times.** Riders noted that travel times had improved since January 2020. One rider was aware of an additional vehicle on the road to help with late trips.

**Drivers.** Riders were very complementary. They said that the mostly newly hired drivers are “extremely courteous and respectful.” They will “apologize if they are a few minutes late.” One noted that drivers will “come to my door and help me to vehicle because I need it.” Riders also reported that most drivers know the area, when they are not sure about where to go; they “know to call into to dispatchers for help.” The written complaint cited rude conversations with a GRTA supervisor and with a program coordinator.

**Resolving complaints.** The written complaint claimed that GRTA had not implemented any of the corrective actions from the previous compliance review and that the board lacks first-hand knowledge of the system or the regulations.

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## 6 Findings and Advisory Comments

This chapter details the findings for each of the areas pertinent to the regulations found in 49 CFR Parts 27, 37 and 38 outlined in the Scope and Methodology section above. For each area, an overview of the relevant regulations and a discussion of the regulations as they apply to GRTA's complementary paratransit service is provided, with corrective actions and a timetable to correct deficiencies for each of the requirements and sub-requirements where necessary.

Findings are expressed in terms of "deficiency" or "no deficiency." Findings of deficiency denote policies or practices found to be not in compliance with DOT ADA regulations or matters for which FTA requires additional reporting to determine whether an ADA compliance issue exists.

Findings of deficiency always require corrective action and/or additional reporting, and will always be expressed as:

- A statement concerning the policy or practice in question at the time of the review
- A statement concerning the DOT ADA requirements being violated or potentially being violated
- A statement concerning the required corrective action to resolve the issue

Advisory comments are statements detailing recommended or suggested changes to policies or practices to ensure effective practices under the ADA or otherwise assist the entity in achieving or maintaining compliance.

### 6.1 Comparable Complementary Paratransit Service

**Requirement:** Under 49 CFR §37.121, the transit agency operating a fixed route system must provide paratransit service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed route system.

**Discussion:** During this review, no deficiencies were found with the requirement. See Attachment C for the Paratransit Rider's Guide (Rider's Guide). In particular, page 4 of the Rider's Guide states:

GRTA Paratransit Service is a shared-ride, public transportation service for people with disabilities that, due to barriers, are prevented from using GRTA's fixed route bus service for some or all of their trips. Paratransit service operates during the same hours as fixed route service. It is not an emergency transportation service.

### 6.2 Paratransit Eligibility Process

#### Absence of Administrative Burdens

**Requirement:** Under 49 CFR §37.125, the transit agency must establish an eligibility process for complementary paratransit. The process may not impose unreasonable administrative burdens

on applicants, and, since it is part of the entity's nondiscrimination obligations under §37.5(d), may not involve "user fees" or application fees to the applicant.

**Discussion:** During this review no deficiencies were found with the requirement to not impose unreasonable administrative burdens on applicants.

GRTA's ADA paratransit eligibility forms are available and easy to find on the GRTA website. Although the link to the applicant's form was not functioning prior to the review, it was fixed while the review team was on site. Applications are also available by contacting GRTA. An accessibility assessment of the new applicant's home is conducted by GRTA staff at a time that is convenient to the rider. The photo identification cards that riders are required to have are made at the GRTA office, which is accessible by transit. GRTA will provide a paratransit ride to the office free of charge, upon request. The GRTA Paratransit Coordinator conducts an orientation session for the new applicant while he or she is at the GRTA office to obtain the photo identification card.

### Paratransit Eligibility Standards

**Requirements:** Under 49 CFR §37.123(e)(1)(3), the transit agency's eligibility processes, application materials, and public information must be comprehensive enough to permit the transit agency to determine that the following individuals are ADA paratransit eligible:

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

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

Any individual with a disability who has a specific impairment-related condition that prevents the individual from traveling to a boarding location or from a disembarking location

**Discussion:** During this review, deficiencies were found with the requirements related to the eligibility process and with how GRTA communicates eligibility for ADA paratransit service to applicants. The review team examined the GRTA paratransit eligibility application form and cover letter, website information, Rider's Guide, and sample eligibility determination letters, and discussed the eligibility determination process at length with the GRTA paratransit coordinator. The team also reviewed a sample of eligibility files.

The team found that GRTA does not apply the standards for unconditional and conditional eligibility described in the application cover letter, sample determination letters, and the Paratransit Rider's Guide, which all discuss functional ability to use fixed route service.

However, GRTA grants eligibility on the basis of the presence of certain disabilities or medical conditions. The team also found that the eligibility application form requests information that is not necessary for the determination of eligibility and/or inappropriate. Two advisory comments are also made, about: (1) expanding the type of health care professionals who may complete Part 7 of the GRTA paratransit eligibility application form; and (2) ensuring that all public information materials regarding the eligibility determination process is consistent and up to date.

**Eligibility process and materials.** The review team examined the information about paratransit eligibility on the GRTA website and in the Rider's Guide, reviewed the agency's paratransit application form, and discussed the eligibility determination process with the GRTA paratransit coordinator.

The GRTA ADA paratransit eligibility process includes: completion of a two-part application form; an assessment of eligible riders' home locations to identify vehicle accessibility issues; an in-person orientation for newly eligible riders; and issuance of a photo identification card.

The application form has seven parts. (Please refer to Attachment D for a copy of the application form.) Parts 1-6 (also referred to among GRTA staff as Part A) are to be completed by the applicant. They cover general information, certification regarding ability to use fixed route service and understanding of GRTA paratransit eligibility and the certification process, information about the applicant's disability (including information about mobility aids and the need for a Personal Care Attendant, or PCA), information about the applicant's ability to use fixed route service, information about current destinations, and information about previous travel training. A map to the applicant's home address is also requested.

Part 1, General Information, requests among other items the applicant's weight, height, hair color, and eye color. That information is included on the photo identification card issued to eligible riders. Part 3, Information About the Applicant's Disability, asks if the applicant requires the assistance of a PCA and presents a checklist of functions that the PCA provides to the applicant (mobility, reading, eating, transfers, medication, and other) for the applicant to complete.

Part 7 (also referred to internally as Part B) is to be completed by a "Guam Licensed Physician," using as many of the five attachments as necessary to describe the abilities of the applicant to use fixed route service. Attachments include:

- Attachment A: Applicant with Cognitive Disabilities
- Attachment B: Applicant with Psychiatric Disabilities
- Attachment C: Applicant with Vision Disabilities
- Attachment D: Applicant with Seizure Disorders
- Attachment E: Applicant with Physical Disabilities

The GRTA paratransit coordinator reviews applications as they are received, primarily to determine whether the medical certification (Part 7) has been completed, but also to note the date the application was received. If the medical certification is not included, the paratransit coordinator contacts the applicant to request that it be submitted.

Once GRTA receives Part 7 of the application, the paratransit coordinator sets up a residential assessment (sometimes referred to by GRTA as a “route assessment”). Due to the rural nature of some parts of the island, where roads are unpaved and/or very narrow and may be unmarked, an in-person assessment by GRTA personnel is needed to determine the type of vehicle that may be used to access the applicant’s home address (the MV-1 only, for example, rather than the larger ARBOC cutaway vehicle), the best method of access and egress to and from the home, and the best location for rider pickup. The type of residence (single family, duplex, or multi-unit apartment) and whether the site includes level ground for deployment of a lift or ramp are also noted. GPS directions are recorded in case operators will need assistance finding the address. The residential assessment is conducted by a designated GRTA paratransit operator or a transit supervisor. The residential assessment reports are submitted to the GRTA transit management center so that information can be entered into the customer database.

When the residential assessment has been completed, the paratransit coordinator contacts the applicant to arrange for an in-person orientation at the GRTA office, at which time the rider also receives a photo identification card. The application cover letter notes that an in-person assessment may be necessary to determine eligibility and the Rider’s Guide notes that an in-person assessment is required. However, while an in-person interview guide has been created, it is not currently used during the eligibility determination process. During the in-person session the paratransit coordinator explains how to use GRTA paratransit service to the applicant and collects any missing information from Parts 1-6 of the applications but does not use the interview guide to help make eligibility determinations.

The Rider’s Guide states the following regarding eligibility standards:

Persons interested in using GRTA’s Paratransit service must apply and be determined to be eligible. You may be eligible if your disability prevents you from using fixed route service. Age is not a qualifying factor for eligibility. Application and information packets are available at GRTA or online at <http://grta.guam.gov>. To be certified as ADA Paratransit eligible, an individual must meet one of the following criteria:

- A specific impairment related condition prevents you from boarding, riding, or disembarking from an accessible vehicle without the assistance of another individual.
- Able to independently board, ride and exit an accessible public transit bus, however, an accessible bus is not assigned to your route.
- A specific impairment related condition prevents you from traveling to or from a stop or station that is serviced by a public transit bus.

The cover letter that is part of the eligibility application form states:

There are two (2) types of ADA Paratransit Eligibility. These are:

- Unconditional – this eligibility is granted if your disability prevents you from using the Guam Public Transit System for all trips that you might need to make.



- Conditional – this eligibility is granted if you can use the Guam Public Transit System buses under certain circumstances, but need GRTA’s Paratransit Services for certain trips.

Sample determination letters for conditional eligibility include the following language:

#### BASIS FOR DETERMINATION

We have determined that, because of your disability, you are not able to use Fixed Route Services under the following conditions. When these conditions exist, you are there [sic] eligible for paratransit services.

- You must walk more than five blocks to get to a bus stop or from a bus stop to your destination
- Sidewalks do not exist or are inaccessible (absence or [sic] curb ramps, broken pavement or steep cross slopes) which prevents you from getting to or from bus stops
- Steep hills prevent you from getting to or from bus stops
- Conditions at bus stops you wish to use prevent bus drivers from deploying lifts or ramps at these stops
- Medical Conditions does [sic] not allow client to be exposed to elements too long
- Medical Conditions (Respiratory, Diabetic, End-Stage Renal Disease, Cancer, Amputee, etc.)

The following checklist is included as well:

#### Conditional Eligibility

You indicated on your application that you are able to travel up to

- Curb Side
- 3 blocks (1/4 mile)
- 6 blocks (1/2 mile)
- 9 blocks (3/4 mile)

You indicated you are Able/Unable to get to and from bus stops as long as the route features level, accessible sidewalks and curb ramps.

The photo identification card issued to eligible individuals contains the following eligibility codes:

- Temporary Conditional
- Temporary Unconditional
- Conditional for Certain Trips
- Unconditional

- Diabetic with Food or Conditional/Diabetic

**Eligible riders, application volume, and certification outcomes.** As of February 2020, there were 538 eligible individuals in GRTA's rider database. The GRTA paratransit coordinator indicated that she typically receives three to seven applications for paratransit eligibility in a week. Statistics provided by GRTA for the 12 months prior to the site visit are shown in Table 6.1.

**Table 6.1 – GRTA Paratransit Eligibility Determination Statistics and Outcomes, 12 Months Prior to Review Site Visit**

<b>Applications received</b>	<b>134</b>
Completed applications processed (% of total)	121 (90%)
Incomplete applications	7
Applicants determined conditionally eligible (% of completed)	110 (91%)
Applicants determined unconditionally eligible (% of completed)	9 (7%)
Applicants determined temporarily eligible (% of completed)	2 (2%)
Applicants determined ineligible	0
Eligibility appeals	0

The paratransit coordinator indicated that despite the language in the Rider's Guide, application cover letter, and sample determination letters, applicants with certain disabilities are granted unconditional eligibility. The disabilities she noted as examples included blindness, cognitive disabilities, and cerebral palsy. All other applicants are granted conditional eligibility, but conditions are not enforced during the trip reservation process. As shown in Table 6.1, 91 percent of applicants are found to be conditionally eligible and only seven percent are granted unconditional eligibility.

**Review of sample determination files.** The review team examined a sample of 19 eligibility files that were submitted between July 2019 and February 2020. Of the applicants in the sample, 17 were granted conditional eligibility and two received unconditional eligibility. Although determinations of unconditional versus conditional eligibility are incorrectly made on the basis of a presence of certain disabilities or medical conditions and not in accordance with an individual's functional ability to use fixed route service, all of the applicants appeared to have been appropriately determined to be eligible rather than ineligible. Information about conditional eligibility that was communicated to these applicants in eligibility determination letters would have been useful to review, but as discussed later, GRTA does not retain copies of those letters so they were not available to the review team.

**Corrective Action Schedule:** Within 60 days of the issuance of the final report, GRTA must submit documentation to show that: (1) unconditional eligibility is granted to applicants who are unable to use GRTA fixed route service under any circumstances, rather than to individuals who have specific disabilities or medical conditions; (2) conditional eligibility is granted to applicants on the basis of circumstances under which they are not able to use GRTA fixed route service rather than on the presence of a specific disability or medical condition; and (3) photo

identification cards show eligibility codes that reflect the revised definition of conditional eligibility (e.g., eligibility codes should not refer to specific disabilities).

GRTA must also submit a revised paratransit eligibility application form that does not request the applicant's height, weight, eye color, hair color, or tasks for which the applicant needs assistance from a PCA.

**Advisory Comments:** An effective practice is to accept professional verification (medical certification) from a broader group of health care professionals than licensed physicians. Other types of professionals, such as orientation and mobility specialists, therapists, clinical social workers, job coaches, and registered nurses may have a better understanding of an individual's functional ability to use fixed route services, and obtaining information from them can be helpful in making eligibility determinations.

Another effective practice is to ensure that all public information materials are up to date and consistent regarding the eligibility determination process. For example, the Rider's Guide, the application form and its cover letter, and any information that may be added to the GRTA website should be consistent regarding whether an in-person assessment is required or may be requested, and whether it is an actual assessment that will be part of the eligibility determination process or an orientation to paratransit for newly eligible riders.

## Accessible Information

**Requirement:** Under 49 CFR §37.125(b), the transit agency must make all information about the process, materials necessary to apply for eligibility, and notices and determinations concerning eligibility available in accessible formats, either as a rule or upon request.

**Discussion:** During this review, no deficiencies were found with the requirement to provide accessible eligibility information or with how GRTA communicates the availability of materials in accessible formats to applicants and potential applicants.

The cover letter that accompanies the eligibility application form states that the application is available in large print and can be provided in another format if needed. Applicants are requested to call GRTA and inform staff of the desired format. Staff explained that the Rider's Guide could also be provided in accessible formats, but that information does not appear to be advertised on the GRTA website or in the PDF version of the Rider's Guide. Requests are passed on to the GRTA Program Coordinator for IT. Other formats that GRTA can provide include email, PDF, and text file. The program coordinator works with Guam System for Accessible Technology (GSAT) to identify and provide other possible formats.

## Eligibility Determinations Within 21 Days

**Requirement:** Under 49 CFR §37.125(c), if the transit agency has not made an eligibility determination on the 21st day following submission of a complete application, it must treat the applicant as eligible on the 22nd day and have a process in place to provide service to the applicant beginning on the 22nd day and until the eligibility determination has been made.

The transit agency's process must communicate the right to this presumptive eligibility to applicants so they are aware of their rights to schedule and use the service, beginning on the 22nd day.

**Discussion:** During this review, deficiencies were found with the requirement to make an eligibility determination within 21 days of receipt of a complete application and with how GRTA communicates presumptive eligibility to applicants. One advisory comment is also made about the effectiveness of maintaining a log to record key dates in the eligibility determination process.

As part of the eligibility determination process, the paratransit coordinator completes a summary form and paratransit process checklist for each application. GRTA gives eligible riders their eligibility determination letters during the in-person assessment/orientation along with the photo identification card and does not retain a copy of the letters. No tracking spreadsheet or log is maintained to record important dates in the determination process, such as the date of completed application, date of residential assessment, and date of in-person orientation/transmission of eligibility determination letter.

The cover letter that is part of the GRTA ADA Paratransit application form states that GRTA will process completed applications within 21 days and that applicants will be notified in writing.

The review team examined the sample of 19 files noted above and found that dates were not entered consistently on the summary forms and checklists. Using the dates on the summary forms and checklists where available, as well as dates on applications (which are sometimes faxed to GRTA), dates on route assessment forms, and eligibility expiration dates on photo identification cards, the team determined that processing of eight of the applications (42 percent) were completed within 21 days, while 11 applications (58 percent) took more than 21 days. The average processing time was 23 days, with minimum and maximum processing times of three and 43 days, respectively. Processing times are broken down further in Table 6.2.

**Table 6.2 – Eligibility Determination Processing Times for 19 Applicants:  
July 2019 to February 2020**

<b>Processing Time (Days)</b>	<b>Number of Determinations</b>	<b>% of Determinations</b>
1–7 days	2	11%
8–14 days	1	5%
15–21 days	5	26%
22+ days	11	58%
<b>TOTALS</b>	<b>19</b>	<b>100%</b>

In some cases, the delay appeared to be due to the number of days needed to complete the residential assessments, which are conducted before the paratransit coordinator contacts the eligible individual to schedule the in-person assessment/orientation. It took an average of 14 days to complete each of the 16 assessments conducted in this sample from July 2019 to February 2020 (minimum of one day after assignment of the residential/route assessment by the paratransit coordinator to a maximum of 29 days). In other cases, up to 30 days elapsed between the completion of the residential assessment and the in-person orientation. The most quickly

scheduled in-person orientations took place on the day that the residential assessments were completed, but the average length of time to schedule and conduct those sessions was eight days. The delays could be due to the availability of the eligible individual but must nevertheless be factored into the 21-day timeline. In a few cases, it took several days for the application to get to the paratransit coordinator for her initial review if she was out of the office on the day it was received.

The cover letter that is part of the GRTA ADA Paratransit application form requests that applicants who have not heard from GRTA within 21 days contact the office to begin receiving paratransit service until their applications have been processed—rather than informing applicants that GRTA will contact them if their application has not been processed within 21 days to arrange for presumptive eligibility until the eligibility determination has been made.

**Corrective Action Schedule:** Within 60 days of the issuance of the final report, GRTA must submit a revised paratransit application cover letter that places the responsibility for activating presumptive eligibility for paratransit service on the 22nd day after the receipt of a completed application on GRTA, rather than the applicant, and evidence of that change in the revised eligibility determination procedures.

**Advisory Comment:** It is an effective practice to maintain a log of key dates in the eligibility determination process so that adherence to the 21-day timeline can be monitored easily. The log could be a spreadsheet or a revised version of the summary form or paratransit process checklist that GRTA currently uses, showing the following dates: receipt of a completed application, request for a residential assessment, completed residential assessment, contacts with applicant to schedule the in-person assessment, and in-person assessment.

## Written Eligibility Determinations

**Requirements:** Under 49 CFR §37.125(d), determinations of eligibility must be made in writing. The documentation must include the name of the eligible individual, the name of the transit provider, the telephone number of the entity's paratransit coordinator, an expiration date for eligibility, and any conditions or limitations on the individual's eligibility including the use of a personal care attendant (PCA). Under §37.125(e), if applicants are found to be ineligible, the determination must state the specific reasons for the decision (a mere statement that the applicant has been found to be ineligible is not sufficient). If an individual has been determined to be conditionally or temporarily eligible, the determination must state the conditions under which eligibility is granted and the basis for that determination. Information concerning the applicant's right to appeal under §37.125(g) must also be provided.

**Discussion:** During this review, deficiencies were found with how GRTA communicates eligibility determinations and the right to appeal those determinations to applicants. An advisory comment is made regarding retention of copies of eligibility determination letters sent to applicants.

The review team examined notification letter templates for individuals determined to be unconditionally, conditionally, or temporarily eligible and those determined to be ineligible. The templates for letters denying eligibility and conferring temporary and conditional eligibility

contained detailed reasons for the decisions in the form of checklists, as described above. The template for letters denying eligibility note that a copy of the GRTA appeal policy and a request for appeal are attached; the paratransit coordinator reported that there is no appeal request form currently in use. The templates for letters conferring less than unconditional eligibility state that the individual has the right to appeal the decision and requests for appeals must be submitted in writing.

The template for letters conferring the various types of eligibility also included all required information: name, address, and phone number of GRTA; phone number of GRTA's paratransit coordinator; type of eligibility and conditions, if appropriate; need for a PCA; expiration date; and notice of right to appeal.

No actual letters that were transmitted to applicants were available to the review team because it is GRTA's practice not to retain copies of those letters. As a result, the team was unable to verify that letters conferring less than unconditional eligibility contain an explanation of the specific reasons for the decision. In addition, because GRTA is using the presence of certain disabilities or medical conditions, rather than functional ability to use fixed route service, to make determinations of unconditional and conditional eligibility, letters that GRTA has sent to applicants who are determined to be conditionally eligible are likely to deviate from the templates in the information they provide about the reason for the decision. Considering these factors, future actual determination letters are the subject of a corrective action below.

The team also examined copies of the photo identification cards issued to eligible individuals in the sample of eligibility files discussed above. Identification cards include the name and address of GRTA, name of the rider, type of eligibility, expiration date, need for PCA, and other information. They do not include the name and phone number of the paratransit coordinator or specific conditions that may apply to the individual's eligibility.

**Corrective Action and Schedule:** Within 60 days of the issuance of the final report, GRTA must submit copies of a sample of actual determination letters sent to applicants who have been determined to be ineligible, conditionally eligible, or temporarily eligible to document that such letters include the specific reasons for the decision.

In the determination letters that confer less than unconditional eligibility, GRTA must include a copy of its appeal policy.

**Advisory Comment:** It is an effective practice for GRTA to retain copies of eligibility determination letters. While transit agencies are not required to do so, copies of the letters provide documentation of the information provided by GRTA to applicants.

## Recertification

**Requirement:** Under 49 CFR §37.125(f), the transit agency is permitted to require paratransit riders to recertify eligibility at reasonable intervals. As stated in Appendix D, a reasonable interval would be between one and three years.

**Discussion:** During this review, no deficiencies were found with the recertification process or with how GRTA communicates recertification of eligibility to applicants. GRTA requires paratransit riders to recertify every three years. The process is explained in the Rider's Guide. Applicants are required to provide an updated application form and receive a new photo identification card during an in-person assessment/orientation.

## Administrative Appeal Process

**Requirements:** Under 49 CFR §37.125(g), the transit agency must have a process for administering appeals through which individuals who are denied eligibility can obtain review of the denial. The transit agency is permitted to require written notice, within 60 days of its written decision denying or limiting eligibility, that the applicant wishes to exercise his or her right to an appeal hearing. The transit agency cannot require the "filing of a written appeal."

The appeal process must include an opportunity for the applicant to be heard and to present information and arguments, with appropriate separation of function (i.e., a decision by a person not involved with the initial decision to deny eligibility). Appeal decisions must be provided in writing and explain the reasons for denying the appeal. The appeal hearing must be scheduled within a reasonable amount of time, and if a decision has not been made within 30 days of the completion of the appeal process, the appellant must be provided paratransit service from that time until and unless a decision to deny the appeal is issued, as required.

**Discussion:** During this review, deficiencies were found with the requirements of the process for appealing eligibility denials or decisions that limit eligibility. An advisory comment is made regarding the provision of consistent information about the appeals process in all public information materials.

The current eligibility appeal procedures contain all the required and permissible elements:

- Appeals must be requested in writing within 60 days of receipt of the determination letter
- GRTA will make arrangements for an appeal hearing, including transportation free of charge to the hearing for the appellant
- Appellants may submit additional information and/or request the appearance of other individuals who have relevant knowledge at the hearing
- Appellants may submit written materials for consideration by the Appeals Panel without a hearing
- Notification of the decision of the Appeals Panel will be submitted to the appellant within 30 days of the date of the hearing or date on which the panel considered the additional information that was submitted, or if no decision is made within 30 days the appellant will be considered eligible for GRTA Paratransit Service until such time as a decision is made

However, the GRTA Executive Manager is included as a member of the three-person Appeals Panel, which also includes the GRTA Transit Supervisor and Chairperson of the GRTA Board of Directors. As the direct supervisor of the paratransit coordinator, who makes eligibility determinations, the Executive Manager cannot hear appeal of those eligibility decisions.



**Corrective Action and Schedule:** Within 60 days of issuance of the final report, GRTA must submit a revised GRTA Paratransit Eligibility Determination Appeal Procedure that does not include the GRTA Executive Manager as a member of the Appeals Panel.

**Advisory Comment:** It is an effective practice to provide full and consistent information about the GRTA appeal process and policies in all communications with applicants and the public. GRTA currently provides somewhat different and partial information about the appeal process in the application cover letter, templates for the various eligibility determination letters, and the Paratransit Rider's Guide.

### Complementary Paratransit for Visitors

**Requirements:** Under 49 CFR §37.127(d) and (e), paratransit service must be made available to visitors not residing in the jurisdiction(s) served by a transit agency for any combination of 21 days during any 365-day period, beginning with the visitor's first use of the service during the 365-day period. The transit agency must treat as eligible all visitors who present information that they are eligible for paratransit service in the jurisdiction in which they reside; for those who do not present such documentation, the transit agency may require documentation of the individual's place of residence and, if the individual's disability is not apparent, of his or her disability. In no case may the transit agency require a visitor to apply for or receive eligibility certification for its own paratransit system before providing this service.

**Discussion:** During this review, deficiencies were found with the requirement to make paratransit service available to individuals meeting the definition of visitor and with how GRTA communicates the information concerning visitor service to individuals. Information on GRTA's website and in the Rider's Guide states:

ADA paratransit eligible visitors, who provide GRTA with documentation of their eligibility, are eligible for GRTA's Paratransit Service. Visitors without documentation, who claim that their disability prevents them from using GRTA's service, will be considered "presumptively" eligible for GRTA's Paratransit Service.

Visitors will be provided Complimentary [*sic*] GRTA Paratransit service for a period not to exceed twenty-one (21) days during any three hundred and sixty-five (365) day period beginning with the visitor's first use of GRTA's Paratransit Service.

Visitors, who request the use of GRTA's Paratransit Service for more than twenty-one (21) days within the three hundred and sixty-five (365) day period from the first day of service, will be asked to submit an application to determine eligibility in the current administrative process.

GRTA's distinction between visitors who present evidence of eligibility from another system, and visitors who do not, is inappropriate. Under 49 CFR §37.127(d), both are to be provided with service as visitors on the same basis as locally-eligible riders, without distinction. Applying "presumptive eligibility" to visitors without certification from another system is a misapplication



of the principle, which applies only to the general eligibility process when the transit agency has not reached a decision within 21 days of its receipt of a completed application from the individual. Visitors are not subject to an eligibility process unless they will be using the system for more than 21 days as specified in 49 CFR 37.127(e). A more accurate statement of the first paragraph of the visitor policy would be, “Visitors without documentation will be able to use GRTA’s Paratransit Service on the basis of the individual’s statement that he or she is unable to use the fixed route transit system.”

**Corrective Action Schedule:** Within 60 days of the issuance of the final report, GRTA must submit a revised policy on service for visitors that does not invoke presumptive eligibility, and evidence that the GRTA website and Rider’s Guide have been updated to reflect the revised policy.

### 6.3 Types of Service

**Requirement:** Under 49 CFR §37.129(a), the transit agency’s ADA complementary paratransit service must be provided on an origin-to-destination-basis. The transit agency may determine through its local planning process whether to establish either door-to-door or curb-to-curb service as the basic mode of paratransit service. Where the local planning process establishes curb-to-curb service as the basic paratransit service mode, however, provision must still be made to ensure that the service available to each passenger actually gets the passenger from his or her point of origin to his or her destination point. To meet this origin to destination requirement, service may need to be provided to some individuals, or at some locations, in a way that goes beyond curb-to-curb service.

**Discussion:** During this review no deficiencies were found with the requirement for GRTA to provide origin to destination service to eligible riders or GRTA’s procedures to provide additional assistance beyond the curb if needed due to disability for eligible riders to complete their trips OR with how GRTA communicates the provision of origin to destination service and passenger assistance to eligible riders.

GRTA’s policy for service is origin to destination. The Rider’s Guide (page 9) states, “An Operator’s responsibility for a customer begins at the origin of the trip and ends at the customer’s destination.” Furthermore, the Rider’s Guide (page 13) states, “Our operators can help you with... getting you from our door or designated stop location to the paratransit vehicle” and “... getting from the paratransit vehicle to the entry door or the designated stop location at your destination.”

Review team interviews with GRTA drivers confirmed that the drivers provided door-to-door service to any riders who required or requested additional service.

### 6.4 Service Criteria

**Requirement:** Section 12143(c)(3) of the ADA directed the Secretary of Transportation to establish minimum service criteria to be used when determining whether the service provided by paratransit is comparable to the regular fixed route system. These criteria are contained in

49 CFR §37.131 and include service area, response time, fares, and hours and days of service, and prohibit restrictions on trip purpose and capacity constraints that limit the availability of service to eligible individuals. The review team assessed GRTA's paratransit system using these criteria as described below.

## Service Area

**Requirement:** Under 49 CFR §37.131(a)(1), all public operators of a fixed route system must provide complementary paratransit service that covers, at a minimum, all areas within a 3/4-mile radius of all of its bus routes, and within a "core service area" that includes any small areas that may be more than 3/4-mile from a bus route, but are otherwise surrounded by served corridors. This includes any areas that cross political boundaries or taxing jurisdictions but are within a 3/4-mile radius of a fixed route, unless the transit agency does not have the legal authority to operate in those areas. For transit agencies operating a light rail or rapid rail system, the paratransit service area must also include a 3/4-mile radius around each station, with service provided from points within the service area of one station to points within the service area of another.

**Discussion:** During this review, no deficiencies were found with the service area of GRTA's paratransit service.

The Rider's Guide (page 5) states:

GRTA provides paratransit services, however, not all areas have guaranteed next day service. Guaranteed next day service is provided to eligible riders within a 3/4-mile corridor of any fixed route service area.

In practice, GRTA paratransit serves all destinations on Guam. At the time of the site visit, GRTA had not defined any 3/4-mile areas around its bus routes. It had no geographic information system to determine whether an address was beyond 3/4-mile.

## Response Time

**Requirement:** Under 49 CFR §37.131(b), the transit agency must schedule and provide paratransit service to any ADA complementary paratransit eligible person at any requested time on a particular day in response to a request for service made the previous day, including during times comparable to normal business hours on a day when the offices are not open before a service day. Reservations may be taken by reservation agents or by mechanical means. Under 49 CFR §37.131(b)(2), while the transit agency may negotiate pickup times with the rider prior to the trip being scheduled, it cannot require the rider to schedule a trip to begin more than one hour before or after the individual's desired departure time. Any greater deviation would exceed the bounds of comparability. The transit agency must have policies and procedures in place to ensure that schedulers and dispatchers do not adjust the rider's negotiated pickup time or the pickup window without the rider's consent.

Under 49 CFR §37.131(b)(4), if the transit agency proposes to change its reservations system, it shall comply with the public participation requirements equivalent to those of §37.137 (b) and (c). The transit agency may permit reservations to be made up to 14 days in advance of an eligible individual's desired trips, subject to the same trip negotiation requirements as next-day trips required under §37.131(b)(2).

**Discussion:** During this review, no deficiencies were found with GRTA's accepting paratransit trip requests during all normal business hours. No deficiencies were found with how GRTA CSRs negotiated with callers on requested pickup times.

The Rider's Guide (page 7) states:

You can reserve a ride one or two days in advance of your trip and up to 2 weeks. Rides for the next day must be reserved no later than 5 p.m. the day before. Reservation lines are open from 8:00 am to 5:00 pm daily.

CSRs accept trip requests during these hours, seven days a week.

The Rider's Guide (pages 7–8) states:

You can plan your trip around a pickup time or an appointment time, but not both.

- Always use a pickup time to schedule your ride unless you must arrive at the destination not later than a certain time, such as for work or a doctor's appointment.
- The Scheduler may negotiate a pickup time with you, but it must be within one (1) hour before or after your requested time, or in time for your appointment or work schedule. Let the call taker know how much flexibility you have regarding your times.

Review team members observed CSRs accepting trip requests during one afternoon (March 3) and one morning (March 4). They heard a total of 91 incoming calls; 25 of these calls involved trip requests. They did not observe any denials. For the calls that involved trip requests, CSRs neither negotiated nor scheduled trip requests: they simply recorded each request, along with the caller's name, telephone number, and time of call. They gave this information to a scheduler. The scheduler was responsible for calling back each individual who requested trips and negotiate the pickup times. Team members interviewed GRTA's main scheduler and reviewed the records of her telephone calls. The review team observed no evidence of improper trip negotiations. However, as discussed later in this section of the report ("No substantial numbers of trip denials or missed trips"), the review team determined that GRTA was denying trips.

At the time of the site visit, GRTA had purchased a paratransit software system, but had not yet installed it. The supervisor at the TMC indicated that GRTA may change its procedures for requesting and negotiating trips when the staff begins to use the paratransit software.

## Fares

**Requirement:** Under 49 CFR §37.131(c), ADA paratransit fares must be no more than twice the fixed route fares for the same trip at the same time of day on the fixed route system, excluding

discounts. The transit agency must allow eligible riders to travel with at least one companion (with additional companions accommodated on a space-available basis). If the passenger is accompanied by a personal care attendant (PCA), the transit agency must provide service to one companion in addition to the PCA. Companions may be charged the same fare as the eligible rider; no fare may be charged for a PCA.

**Discussion:** During this review, no deficiencies were found with GRTA's paratransit fares. GRTA's base fare for all bus routes is \$1.50. GRTA charges 50 cents per trip for its paratransit service. Passes are available for unlimited paratransit trips for one day (\$1.50), one week (\$7.50), and one month (\$25). Riders are permitted one personal care attendant to accompany them, free of charge. Each guest is charged 50 cents per ride.

### No Trip Purpose Restrictions

**Requirement:** Under 49 CFR §37.131(d), there can be no restrictions or priorities based on trip purpose. When a user reserves a trip, the entity will need to know the origin, destination, time of travel, and how many people are traveling. The entity does not need to know why the person is traveling and should not even ask.

**Discussion:** During this review, no deficiencies were found with this requirement. The Rider's Guide (page 7) states:

Transportation is arranged on a first-come first-served basis. ADA regulations do not permit scheduling according to priority of purpose

The review team did not observe any restrictions or prioritization of trip requests or trip scheduling based on trip purpose. GRTA CSRs and schedulers did not record the trip purposes of requested trips.

### Hours and Days of Service

**Requirement:** Section 37.131(e) of the DOT ADA regulations requires that the ADA complementary paratransit service be available during the same hours and days as the fixed route service. This means that if a trip can be taken between two points on the entity's fixed route system at a specific time of day, it must also be able to be taken on paratransit. It also means that the service area may change depending upon the time of day or day of the week, when certain routes or areas may not be served. This requirement applies on a route-by-route basis. For example, an area that has fixed route bus service on weekdays but not weekends must have complementary paratransit service (provide trips) on weekdays but not necessarily on weekends; an area that has bus service from 5 a.m. until 9 p.m. must have complementary paratransit service, at minimum, from 5 a.m. until 9 p.m.

**Discussion:** During this review, deficiencies were found with GRTA's hours and days of service. GRTA does not accept trip requests with pickup times within an hour of the end of the service hours of its fixed route bus service.

Table 6.3 summarizes the days and hours of the GRTA bus routes. Service operates Monday to Saturday (except certain holidays). Saturday schedule is the same as the weekday schedule, with the exception of one route. Depending on route, service begins at 5:30 or 6 a.m. and extends to 7:30–8:30 p.m. All GRTA routes have a midday break with no service, 12:30–1:30 p.m.

**Table 6.3 – GRTA Bus Routes: Days and Hours**

Route	Start (a.m.)	End (p.m.)	Break	Saturday	Notes
Grey	5:30	8:30	12:30 p.m.-1:30 a.m.	Same	
Grey 2	6:00	8:15	Only 3 runs	Same	Alternates with Orange
Orange	7:15	5:25	12:30 p.m.-1:30 a.m.	No service	Alternates with Grey 2
Green	5:30	8:15	12:30 p.m.-1:30 a.m.	Same	
Blue 1	5:30	7:30	12:30 p.m.-1:30 a.m.	Same	Alternates with Blue Express
Blue Express	7:30	8:30	12:30 p.m.-1:30 a.m.	Same	Alternates with Blue 1
Blue 2	5:30	8:15	12:30 p.m.-1:30 a.m.	Same	
Red	5:30	7:30	12:30 p.m.-1:30 a.m.	Same	

GRTA CSRs accept trip requests for pickups as late as 7:30 p.m., but no later. This may be appropriate in instances when an individual requesting a ride after 7:30 p.m. is located in a distant part of the island that might result in the drop-off not occurring by 8:30 p.m. (or 7:30 or 8:15 p.m., corresponding to the end time of any route within 3/4-mile of the drop-off address). However, for trips with relatively short travel times, not having pickups after 7:30 p.m. would not be comparable to fixed route service.

**Corrective Actions and Schedule:** Within 60 days of receiving the final report, GRTA must accept and schedule all trip requests whose pickup and drop-off times would take place during fixed route service hours. GRTA must also communicate these paratransit service hours to its riders.

### Absence of Capacity Constraints

**Requirement:** Under 49 CFR §37.131(f), the transit agency may not limit the availability of complementary paratransit service to ADA paratransit eligible individuals by any of the following: restrictions on the number of trips an individual will be provided; waiting lists for access to the service; or any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons. Such patterns or practices include but are not limited to, substantial numbers of significantly untimely pickups for initial or return trips, substantial numbers of trip denials or missed trips, or substantial numbers of trips with excessive trip lengths.

### No restrictions on the number of trips

**Requirement:** Under 49 CFR §37.131(f)(1), the transit agency may not impose restrictions on the number of trips that will be provided to an eligible rider.

**Discussion:** During this review, no deficiencies were found with this requirement. GRTA does not have a policy of restricting the number of paratransit trips that an individual may take. Review team members observed no practice of trip caps during the site visit.

### No waiting list for access to the service

**Requirement:** Under 49 CFR §37.131(f)(2), the transit agency is prohibited from establishing policies or engaging in practices and/or procedures that establish waiting list(s) for accessing the service.<sup>1</sup>

**Discussion:** During this review, no deficiencies were found with the requirement to establish waiting lists for paratransit trips.

As discussed earlier in this section of the report (“Response Time”), CSRs neither negotiated nor scheduled trip requests: they recorded each request, along with the caller’s name, telephone number, and time of call. They gave this information to a scheduler. The scheduler was responsible for calling back each individual who requested trips and negotiate the pickup times. This practice does not appear to constitute a waiting list.

However, as discussed later in this section of the report, this practice did result in GRTA’s improper denial of certain trip requests. Please see “No substantial numbers of trip denials or missed trips” for a full discussion.

### No substantial numbers of significantly untimely pickups

**Requirement:** Under 49 CFR §37.131(f)(3)(i)(A), the transit agency must provide ADA paratransit service without any substantial numbers of significantly untimely pickups for initial or return trips.

**Discussion:** During this review, no deficiencies were found with the requirement that complementary paratransit service be provided without a substantial number of untimely pickups. No deficiencies were found with GRTA’s performance standard. Advisory comments are made relating to clarifying and publicizing the on-time pickup window; clarifying the performance standard; and ongoing monitoring of on-time pickup performance.

In material provided to the review team prior to the site visit, “GRTA sets the standard that 98 percent of pickups will be on time or early... On-time is considered when the driver arrives at the pickup location within 10 minutes of the scheduled pickup time.”

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<sup>1</sup> Under § 37.133(c), waiting lists may only be established for participation in subscription service that may be offered as part of the transit agency’s complementary paratransit system.

However, the Rider's Guide (page 6) states:

Operators do their best to make pick-ups on time and to get customers to their destinations on time. The system standard for on-time performance is 90 percent or above...

Your pickup window is 5 minutes before and after your scheduled pickup time. If necessary, the operator will wait a maximum of five minutes past your scheduled time.

In practice, GRTA uses a pickup window of 0 to 30 minutes after the negotiated pickup time (0/+30). During team member interviews, both drivers and riders were unclear about the pickup window; few could cite the correct window. Many drivers and riders confused the pickup window with the five-minute wait time provided to riders after a vehicle's arrival at a pickup location.

As of the review team's site visit, GRTA had not been monitoring on-time pickup performance for its paratransit service since it began to directly operate the paratransit service in January 2020.

GRTA provided the review team with completed manifests for all scheduled service during February 2020. The review team created an analysis sample that included 14 vehicle runs: two each (one morning, one afternoon) from seven different dates. The seven dates included at least one from each day of the week. This sample of vehicle runs yielded 143 completed trips with sufficient data to analyze on-time pickup performance (negotiated pickup time and actual pickup time).

As shown in Table 6.4, of these 143 completed trips, 93 percent were early or on time: 50.3 percent within the (0/+30) pickup window, and 42.7 percent earlier. This yields seven percent of trips with late pickups. Of these late pickups, 1.4 percent (two trips) were more than 15 minutes late; no trip was more than 30 minutes late.

**Table 6.4 – On-Time Pickup Performance for GRTA Paratransit Trips: February 2020**

<b>Trips</b>	<b>Number</b>	<b>Percent</b>
Total sample	143	100%
Early	61	42.7%
In window (0/+30)	<b>72</b>	<b>50.3%</b>
<b>Early or in Window</b>	<b>133</b>	<b>93.0%</b>
<b>All late</b>	<b>10</b>	<b>7.0%</b>
1–15 minutes late	8	5.6%
16–30 minutes late	2	1.4%
>30 minutes late	0	0%

This pickup performance meets GRTA's standard of 90 percent in the window or early. There are not a substantial number of significantly untimely pickups.



**Advisory Comments:** It is an effective practice to publicize the pickup window so that riders, dispatchers, and drivers have the same understanding and act with this window in mind.

It is also an effective practice to provide consistent information about the performance standard for on-time pickups so that all interested groups—riders, employees, managers, and board members—understand the level of service to expect.

It is also an effective practice to monitor on-time pickup performance on an ongoing basis. If performance falls below GRTA’s standard, it should investigate the causes and act to improve the performance.

### **No substantial numbers of trip denials or missed trips**

**Requirements:** Under 49 CFR §37.131(f)(3)(i)(B), the transit agency must provide paratransit service without substantial numbers of trip denials or transit agency missed trips. A denial occurs whenever a transit agency is unable to provide a trip on a next-day basis as requested by an eligible passenger between points within the paratransit service area, at a time when the fixed route system is operating, subject to the limitations on trip time negotiation. Under 49 CFR §37.131(b), the transit agency may negotiate pickup times with a passenger, but cannot require the passenger to schedule a trip to begin more than one hour before or after his or her desired departure time. If the trip cannot be arranged within this timeframe, a denial has occurred whether or not the passenger accepts a departure time of more than one hour earlier or later. In addition, when a denied trip makes a subsequent requested trip impossible, as could occur in the case of an individual taking a round trip to and from a specific location, two trips have been denied.

**Discussion:** During this review, deficiencies were found with the number of GRTA trip denials and with GRTA’s improper tracking of paratransit trip denials. Deficiencies were also found with GRTA’s lack of tracking of missed trips.

In material sent to the review team prior to the site visit, GRTA set forth its definition for trip denials (“Denied Trip Standard Operating Procedures”: SOP). GRTA created this definition in 2018, while it was still using a contractor to provide paratransit service. GRTA managers confirmed that the definition was still in effect.

- Rider requests a next-day trip and GRTA cannot provide the trip
- Rider requests a next-day trip and GRTA can only offer a trip that is outside the one-hour negotiating window. This is a denial regardless of whether rider accepts the offer
- Rider requests a round trip and GRTA can provide only one leg of trip. If rider does not take the offered one-way trip, both portions of the round trip are denials

GRTA’s standard for denials (also in the 2018 SOP) is “that there should be no more than 1% or 30 denials for any given month.” DOT ADA regulations require a transit agency to plan and operate its paratransit system to serve 100 percent of anticipated demand. While occasional denials may be unavoidable, a transit agency must not establish a standard that allows an ongoing pattern or practice of denials.



During FYs 2017–2019, GRTA’s reporting of denials was incomplete. As shown in Table 6.5, GRTA tracked denials for only 10 of 24 months during FY 2018 and FY 2019. In nine of these 10 months, the number of denials exceeded GRTA’s standard. In FY 2017, the number of denials exceeded the standard in five of 12 months.

**Table 6.5 – GRTA Reported Denials**

<b>Fiscal Year</b>	<b>Number of Months with Data</b>	<b>Reported Denials</b>	<b>Number of Months with at Least 1% or 30 Denials</b>
2017	12	315	5
2018	8	620	8
2019	2	61	1
2020 (October 2019–February 2020)	5	142	2

Since GRTA began to directly operate paratransit service in January 2020, the interim executive manager made it a priority to not have denials. As of the time of the review team’s site visit, GRTA reported 142 denials during the first 5 months of FY 2020, none of these were in January or February 2020.

GRTA’s existing scheduling procedures, however, have led to denials that have not been reported. At the time of the review site visit, GRTA had been using an unusual process for accepting and negotiating trip requests.

1. Rider calls GRTA during regular hours (8 a.m.–5 p.m., seven days a week)
2. GRTA CSR records four pieces of information:
  - a. Rider name
  - b. Rider telephone number
  - c. Date of requested trip(s)
  - d. Date and time of call
3. CSR transcribes this information and hands to GRTA scheduler
4. GRTA scheduler calls back each rider—generally on same day, in order of calls received
5. Scheduler—if she makes contact with rider—gathers all other necessary information to negotiate trip: requested pickup or appointment time; origin and destination addresses; use of mobility equipment; PCA and/or companion(s). At end of each call, trips are confirmed
6. If scheduler does not make contact, she will try at least two more times; sometimes, rider calls back before scheduler tries to call

However, when following this series of steps, the scheduler may occasionally fail to make contact with certain riders prior to the day of the requested trips. If no return call takes place (and the rider does not call back), these trip requests do not take place and do not get scheduled. Ultimately, the trips do not occur. This lack of connection between the scheduler and rider results in trip denials.

A team member reviewed the scheduler's telephone log of riders who called to request trips during March 1–4, 2020 (plus additional rider calls on February 29 and March 5), along with the attempts by the scheduler to make contact. This review found three of 187 (1.6 percent) unsuccessful callbacks. These missed contacts constitute denied trips. If this sample represents a typical set of rider trip request calls and GRTA callbacks, this could be considered as a substantial number of denials.

Prior to the review team's site visit, GRTA provided its "No-Show and Late Cancellation Policy." The definition of a missed trip—called "transit agency error"—is included. GRTA, however, has not been keeping track of its missed trips.

- Vehicle arrived late, after the pickup window
- Vehicle arrived early, before the pickup window, and the passenger was not ready to go
- Vehicle never arrived
- Vehicle went to wrong location
- Driver did not follow correct procedures to locate the passenger
- Passenger cancelled in a timely way but the cancellation was not recorded correctly or was not transmitted to the driver in time

**Corrective Actions and Schedule:** Within 60 days of receiving the final report, GRTA must specify the steps that it will take to eliminate trip denials. GRTA must also provide evidence that it has instructed its CSRs and schedulers to properly identify and record all trip denials.

GRTA must also demonstrate that it is tracking and properly counting missed trips.

### **No substantial numbers of trips with excessive trip lengths**

**Requirement:** Under 49 CFR §37.131(f)(3)(i)(C), the transit agency must provide ADA paratransit service without substantial numbers of trips with excessive trip lengths.

Comparability is based on the length of time required to make a similar trip between the same two points using the fixed route system, including time spent traveling to and from a boarding point and waiting for the fixed route vehicle to arrive. FTA recommends basing paratransit travel time on the comparable fixed route travel time, plus 20–30 minutes to allow for a reasonable estimate of time spent walking to and from a bus stop, waiting for the bus to arrive, and making any necessary transfers from one vehicle to another.

**Discussion:** During this review, a deficiency was also found with GRTA's standard for an excessive trip length. No deficiencies were found with the number of trips with excessive trip lengths.

An advisory comment is offered regarding GRTA's monitoring of trip lengths.

In material sent to the review team prior to the site visit, GRTA stated, "the standard for excessive length of trip is 2 hours for paratransit services. The average length of a trip for fixed route is approximately two hours." Furthermore, "should a trip last longer than two hours it will

be flagged as an excessively long trip by highlighting the trip or by notating at the bottom of the daily report.” A standard for paratransit trip length should not be an absolute length of time. Rather, a standard should be based on comparing a paratransit trip’s travel time to the travel time of a comparable trip on fixed route, not an “average length.”

Since GRTA began to directly provide paratransit service, it had not been monitoring trip lengths on an ongoing basis.

Based on the February 2020 sample of 143 completed trips, the average (mean) trip length was 30 minutes, and the median trip length was 24 minutes. Fourteen percent of trips were longer than 60 minutes; 2.1 percent of trips were longer than 90 minutes.

The review team analyzed 16 trips from the sample period, all with travel time of greater than 58 minutes. A team member worked with GRTA staff to generate travel times for the fixed route trips comparable to these 16 paratransit trips, i.e., same pickup time, same origin and destination. Table 6.6 presents the results of the analysis.

**Table 6.6 – Comparison of GRTA Paratransit Travel Times  
To Comparable Fixed Route Trips**

<b>Paratransit Travel Time Compared to Fixed Route Travel Time</b>	<b>Number of Trips</b>
Sample size of long trips	<b>16</b>
Less than fixed route travel time	12
Bus route ends service day too early to make comparable trip	3
No bus route travels near destination address	1

The travel time for 12 paratransit trips in the sample was less than the travel time of their respective comparable fixed route trips. For three of the sample trips, the bus route that a fixed route passenger would have used to complete the comparable trip ended its service day before that trip could be completed. For the other sample trip, no GRTA fixed route travels close to the destination.

Base on this analysis it does not appear that there are a substantial number of GRTA paratransit trips with excessive trip lengths.

**Corrective Actions and Schedule:** Within 60 days of receiving the final report, GRTA must revise its standard for excessive trip length so that the standard is based on comparability with similar trips made using the fixed route system, rather than on an average trip length.

**Advisory Comments:** It is an effective practice for GRTA to monitor paratransit trip lengths on an ongoing basis. If performance falls below GRTA’s standard, GRTA should investigate the causes and act to improve the performance.

## **No operational patterns or practices limiting the availability of service**

### **Telephone Hold Times**

**Requirement:** 49 CFR §37.131(f) prohibits any operational patterns or practices that significantly limit availability of service to ADA eligible people. Examples of such operational patterns or practices include insufficient capacity to take reservations, long telephone hold times, and untimely drop-offs for appointments.

**Discussion:** During this review, deficiencies were found with GRTA's telephone performance for paratransit service. Advisory comments are also offered regarding monitoring of telephone system performance.

Information provided to the review team prior to the site visit stated that "95% of calls should be answered within 3 minutes, and 99% of calls should be answered within 5 minutes." This standard does not specify the timeframe that GRTA intends to use to determine if it is meeting the standard.

GRTA paratransit riders call 671-647-7433 (or x7434 or x7435) to reserve a ride, cancel a ride, or for customer service or lost and found. GRTA has other telephone numbers for eligibility, complaints, fare coupon purchases, and other information.

At the time of the review team's site visit, the telephone system used by GRTA CSRs did not collect data on incoming telephone calls, including data on hold times. As a result, GRTA was not able to monitor or demonstrate that it was meeting its standard for telephone hold time performance.

According to GRTA's interim executive manager, GRTA was planning to install a new telephone system later in 2020, after the review team's site visit. This new system would be able to collect telephone hold time data.

Review team members observed GRTA CSRs accept trip requests on March 3 and 4, 2020. Team members observed that the CSRs seemed to be able to handle the incoming volume of telephone calls. However, this cannot be conclusive without analyzing telephone data.

**Corrective Actions and Schedule:** Within 60 days of receiving the final report, GRTA must provide an update on the installation of its new telephone reservation system and a description of how it will monitor calls for excessive hold times.

**Advisory Comments:** It is an effective practice for GRTA ensure that its future telephone system provide performance data that corresponds to its standard, i.e., data that indicates what percent of telephone calls are on hold for over three minutes and over five minutes. It is also an effective practice for GRTA to ensure that its telephone hold data is in small time intervals (e.g., hourly) so that GRTA can identify specific periods when telephone performance is not meeting its standard.

## No operational patterns or practices limiting the availability of service

### Untimely drop-offs for appointments

**Requirement:** 49 CFR §37.131(f) prohibits any operational patterns or practices that significantly limit availability of service to ADA eligible people. Examples of such operational patterns or practices include insufficient capacity to take reservations, long telephone hold times, and untimely drop-offs for appointments.

**Discussion:** During this review, one deficiency was found with this requirement. GRTA has a high proportion of untimely drop-offs for paratransit trips with known appointment times. Advisory comments are also made regarding tracking trips with known appointment times and establishing performance standards.

GRTA does not have a standard for on-time drop-off performance for paratransit service. GRTA does not monitor paratransit drop-off performance.

GRTA explicitly allows riders to schedule trips based on an appointment (drop-off) time. The Rider's Guide (pages 7–8) states:

You can plan your trip around a pickup time or an appointment time, but not both.

- Always use a pickup time to schedule your ride unless you must arrive at the destination not later than a certain time, such as for work or a doctor's appointment
- The Scheduler may negotiate a pickup time with you, but it must be within one (1) hour before or after your requested time, or in time for your appointment or work schedule. Let the call taker know how much flexibility you have regarding your times

When reserving rides to/from a specific appointment, be sure to:

- Allow for time you may need to get from the paratransit vehicle to your destination inside the building

To conduct an analysis of on-time drop-off performance, the review team used the same sample of completed trips that it used for the analysis of pickup performance (see “No substantial numbers of significantly untimely pickups” earlier in this section of the report). Of the 143 completed trips in this sample, only 32 (22.4 percent) had designated appointment times.

Table 6.7 presents a summary of on-time drop-off performance.

**Table 6.7 – On-Time Drop-off Performance for GRTA Paratransit Trips: February 2020**

<b>Trips</b>	<b>Number</b>	<b>Percent</b>
Trips in sample with requested drop-off time	32	100%
0-15 minutes early	3	9.4%
16-30 minutes early	6	18.8%
> 30 minutes early	18	56.3%
<b>All on time</b>	<b>27</b>	<b>84.4%</b>
<b>All late</b>	<b>5</b>	<b>15.6%</b>
1–15 minutes late	4	12.5%
>15 minutes late	1	3.1%

As shown in Table 6.7, five trips (15.6 percent) in the sample with a requested drop-off time were late. Of the late drop-offs, one trip (3.1 percent) was more than 15 minutes late. While this is a small sample, the analysis indicates the potential for poor drop-off performance. When team member observed the GRTA dispatchers (usually one of the CSRs on duty also had primary responsibility for vehicle dispatching), it appeared that adhering to on-time drop-off performance was not a priority.

**Corrective Actions and Schedule:** Within 60 days of receiving the final report, GRTA must specify the steps that it will take to improve on-time performance for paratransit trips with known appointment times.

**Advisory Comments:** It is an effective practice for GRTA to establish a standard for on-time drop-off performance. It is also an effective practice for GRTA to monitor on-time drop-off performance on an ongoing basis.

## 6.5 Subscription Service

**Requirement:** Under 49 CFR §37.133, the transit agency is permitted (but not required) to provide subscription service (pre-arranged trips at a particular time not requiring individual trip reservations for each trip). If provided, however, subscription service may not comprise more than 50 percent of the available trips at any given time unless the system is experiencing no capacity constraints.

**Discussion:** During this review, deficiencies were found with the requirements concerning the provision of subscription trips as part of the ADA paratransit program or with how GRTA communicates this requirement to eligible riders and potential users of the service.

GRTA offers subscription service for its paratransit riders. The Rider's Guide (pages 8–9) states:

You may request a “subscription” reservation for a recurring trip that meets the following criteria:

- trip is for employment, medical, education, or day care
- trip is taken at least once each week on the same day
- trip is between the same location(s) and at the same time
- trip has been taken consistently over the previous 30-day period

- trip is expected to continue for at least six months

... Subscription reservations must be taken at least 75 percent of the time. That means that cancellations and/or no-shows may not exceed 25 percent. Subscription reservations with excessive cancellations and/or no-shows will not be continued.

Given the potential capacity constraints discussed earlier in this section of this report (“Untimely Drop-offs for Appointments”), GRTA will have to conduct an analysis of when its subscription trips are taking place. Depending on the results of this analysis, GRTA may have to limit the proportion of subscription trips during service hours when capacity constraints take place.

**Corrective Actions and Schedule:** Within 60 days of receiving the final report, GRTA must review its pattern of subscription trips by hour of day and day of week. It then may need to adjust the number and/or distribution of subscription trips, and demonstrate that the proportion of subscription trips does not exceed 50 percent of the available trips during any hour during which paratransit service has capacity constraints.

## 6.6 Reasonable No-Show Policies and the Right to Appeal

**Requirement:** Section 37.125(h) of the DOT ADA regulations states that the transit agency “may establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit service to ADA eligible individuals who establish a pattern or practice of missing scheduled trips.” FTA has permitted transit systems to regard late cancellations as no-shows if and only if they have the same operational effect on the system as a no-show, generally less than 1–2 hours of the scheduled trip time.

Under 49 CFR §37.125(h)(1), trips missed by riders for reasons beyond their control, including trips missed due to operator or transit system error, must not form the transit agency’s basis for determining that such a pattern or practice exists. The transit agency’s policies must therefore distinguish between no-shows that are within the rider’s control and those that are not, and propose sanctions only on the basis of the former. In order to establish whether a rider has engaged in a pattern or practice of missing scheduled trips, the transit agency must also account for a passenger’s frequency of use. The appeals process required under §37.125(g) must be available to an individual on whom sanctions have been imposed, and the sanction must be stayed pending the outcome of the appeal.

**Discussion:** During this review, deficiencies were found with the requirements concerning GRTA’s no-show and late cancellation policies and the reasonableness of proposed suspension periods and how GRTA communicates these requirements to eligible riders and potential users of the service.

The review team examined information about policies regarding no-show/late cancellation violations on the GRTA website, in the Rider’s Guide, and in an updated draft policy submitted prior to the site visit, and discussed those policies with the GRTA paratransit coordinator. The team found that the policies do not define thresholds for suspension of service due to no-shows or late cancellations or the duration of suspensions consistently. Different appeal procedures are

attached to the various policies as well. The updated draft policy includes the possibility of indefinite suspension of service for the highest level of no-shows.

An Advisory Comment is made about the provision of complete, correct, and accurate information about the no-show and late cancellation policy and appeal procedures.

The no-show policy stated on the GRTA website and in the Rider's Guide (page 10) includes the following definition:

A "No Show" occurs when a customer has scheduled ADA paratransit service and the customer has not cancelled the scheduled trip one or more hours before the scheduled pickup time.

The website information notes that a pattern of no-shows may result in a temporary suspension of service.

The Rider's Guide later defines a no-show as late cancellations of unneeded rides, or not being present or ready to board when the vehicle arrives or within five minutes after the vehicle operator comes to the door (page 15) and defines a late cancellation as less than one hour in advance of the pickup time. It also gives a suspension threshold of three or more no-shows or 10 percent of completed trips, whichever is greater, within a 30-day period. The possible length of a suspension for the first or subsequent violations is not addressed.

A draft of another no-show and late cancellation policy, dated November 20, 2019, was submitted by GRTA in advance of the site visit. The paratransit coordinator noted that although no-shows and late cancellations are recorded by dispatchers, GRTA was not enforcing the no-show/late cancellation policy at the time of the review team's site visit.

The November 2019 draft policy defines a no-show as failure to appear within 10 minutes after the scheduled pickup time or cancellation within one hour of the "time of the trip request." It explains the following thresholds for suspensions of service on page 4:

1. Passengers with trips resulting in a no-show will be subject to the following guidelines:
  - a. Frequent Riders: Passengers who average five (5) or more trips in a week (based on the usage for previous thirty (30) days) or when the passenger uses the services 30% of the time in a 30 day period (no-shows divided by number of days serviced in the month)
    - Five (5) no-shows in any consecutive thirty (30) day period will result in a warning letter issued
    - Ten (10) no-shows in any consecutive sixty (60) day period will result in a suspension of service for five (5) calendar days
    - Fifteen (15) no-shows in any consecutive ninety (90) day period will result in a suspension of service for an additional thirty (30) calendar days
    - Ten (10) or more no-shows in any consecutive one hundred twenty (120) day period will result in indefinite suspension



- b. Non-Frequent Riders: Passengers who average five (5) trips in a month
- Three (3) no-shows in any consecutive thirty (30) day period will result in a warning letter issued
  - Six (6) no-shows in any consecutive sixty (60) day period will result in a suspension of service for five (5) calendar days
  - Ten (10) no-shows in any consecutive ninety (90) day period will result in a suspension of service for an additional thirty (30) calendar days

Suspensions will begin seven (7) days after the date of notification.

While the guidelines presented above attempt to account for a rider's frequency of travel for potential service suspensions, the thresholds are too low and do not represent a pattern or practice of missing scheduled trips as required under 49 CFR §37.125(h)(1).

Page 5 of the draft policy includes the following definitions of no-shows and suspensions. Note that paragraph number 2 below is not consistent with the GRTA policies presented above. This policy does not account for frequency of travel for potential service suspensions. In addition, suspension period of the policy is unclear; while 30 days is the maximum that FTA will consider as a "reasonable period of time" in extreme circumstances, it is not appropriate for a first suspension.

1. The driver will wait for passengers for ten (10) minutes beyond the scheduled pickup time. Passengers who do not make themselves available within that window will be considered a no-show.

The driver will make reasonable attempts to locate the passenger. If the passenger cannot be located within five (5) minutes, the driver must contact the dispatcher with the no-show information. The dispatcher has the responsibility to determine if the driver is to continue without the passenger.

Upon permission to continue without the passenger, the driver is to record the arrival time, departure time and the vehicle mileage on the Daily Manifest.

All no-show results will be recorded and analyzed by GRTA's Executive Manager or designee as necessary.

2. Passengers who have three (3) no-shows or late cancellations in 30 days will be sent a written warning. The written warning will state that two (2) additional no-shows or late cancellations in the next thirty (30) days may result in transportation privileges being suspended for up to 30 days.

Both policies include written notification of pending suspensions to the rider, and both policies give riders who have been informed that their service will be suspended the opportunity to contest the decision. The Rider's Guide refers to Grievance and Appeals procedures, a copy of

which is to be included with suspension letters. Those procedures, provided by GRTA during the site visit, address the filing of complaints and appeals of final determinations regarding complaint issues. The November 2019 draft no-show and late cancellation policy includes a Suspension of Services and Appeals Process that applies to refusals of service, immediate suspension of service, and suspension of service for no-shows, disruption of service, and non-payment of fare. (Note that the November 2019 draft appeal process contains the same definition of no-shows and late cancellations and suspension thresholds as the Rider's Guide.) The appeal process allows a rider to request an appeal within 30 days of receipt of the suspension letter, submit additional information and/or meet with an Appeals Committee, which will make a recommendation within 30 days to the GRTA Ombudsperson. The Ombudsperson will issue a final written determination to the rider within three days and the suspension, if upheld, will be implemented within seven days of that determination.

The November 2019 draft no-show and late cancellation policy includes the possibility of suspension of service for an indefinite period of time for riders with ten or more no-shows in a 120-day period. FTA considers suspension of service for more than 30 days to be excessive.

GRTA is not required to have a no-show and late cancellation policy, but if it chooses to do so, it must develop procedures for establishing that a pattern or practice of missing scheduled trips exists. FTA recommends consideration of both the absolute number and frequency of no-shows, excluding trips that are missed due to factors outside of the rider's control. Suspension periods must be for a reasonable period of time. GRTA must make an appeal process available for riders who have been notified of a suspension of service that includes written notice of a proposed suspension, the opportunity to present information in person, and the delay of a suspension of service until the conclusion of the appeal process.

**Corrective Action and Schedule:** Within 60 days of the issuance of the final report, GRTA must submit a revised no-show and late cancellation policy based on suspension for a reasonable period of time in response to a rider's established pattern or practice of missing scheduled trips. The policy must address the following components:

- Consistent definition of no-shows and late cancellations and suspension thresholds throughout the policy
- Procedures for determining a pattern or practice of missing scheduled trips
- Written notification to the rider of a proposed suspension
- Appeal procedures that allow the rider to present information to GRTA to contest the suspension, in person if desired. Hearings should be scheduled in a timely manner
- Timely appeals decisions, with the continued provision of service to the rider if the appeal process is not concluded within 30 days
- Written notification to the rider of the appeal decision

For reference, a sample no-show policy can be found in FTA Circular 4710.1, pp. 9A-11–9A-13. GRTA must also submit evidence that the GRTA website and Rider's Guide completely, correctly, and consistently explain suspensions for no-shows and late cancellations according to the revised policy.

## 6.7 Complaint Resolution

**Requirements:** Under 49 CFR §§27.13(a) and 37.17(a), the transit agency must designate at least one person to coordinate its efforts to comply with the nondiscrimination requirements contained in DOT ADA regulations.

Under 49 CFR §§27.13(b) and 37.17(b), the transit agency must adopt procedures that incorporate appropriate due process standards and provide for the prompt and equitable resolution of complaints. This includes sufficiently advertising to the public the process for filing a complaint. Public advertising will typically include the agency's website. The complaint procedures must be accessible to and usable by individuals with disabilities. Finally, the transit agency must promptly communicate its response to the complaint allegations, including its reasons for the response, to the complainant by a means that will result in documentation of the response.

Under 49 CFR §27.121(b), the agency must keep all complaints of noncompliance on file for one year and a record of all such complaints (which may be in summary form) for five years. Establishing these policies and procedures is the responsibility of the transit agency, not its contractors.

**Discussion:** During this review, deficiencies were found with GRTA complaint procedures. GRTA has not designated an individual to coordinate its efforts to comply with the requirements. GRTA's stated complaint procedures were inconsistent. GRTA records do not consistently indicate the responses provided to complainants. GRTA does not have a record of complaints for five years.

A rider has the option of filing either an informal or formal complaint. According to Rider's Guide, a rider may file complaints by phone, email or in person. The GRTA website does not have a way for a rider to directly enter and submit a complaint. Instead, it provides telephone number and email address for complaints. For "complaint forms," the website lists the name and telephone number of the secretary for GRTA's board.

The website ([grta.guam.gov/services/paratransit-riders-guide/about-complaints](http://grta.guam.gov/services/paratransit-riders-guide/about-complaints)) summarizes the complaint investigation process including providing information regarding timelines, reporting, and appeals process:

Once GRTA accepts the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within five (5) calendar days. The complaint will receive a case number and will be logged in GRTA's records identifying its basis and alleged harm, and the race, color, and national origin of the complainant.

In cases where GRTA assumes the investigation of the complaint, GRTA will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days from the date of GRTA's written notification of acceptance of the complaint to furnish a response to the allegations.

In cases where GRTA assumes the investigation of the complaint, GRTA's Investigator shall prepare an investigative report for review by GRTA's Executive Manager within forty (40) calendar days of the acceptance of the complaint. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

Upon issuance of a decision by the Executive Manager, GRTA will notify all parties about the findings and determination.

The Grievance Review and Appeals Board will serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by GRTA. The Review Board will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.

The review team discussed the complaint process with GRTA managers and identified some inconsistencies. It appeared that no specific individual had the clear responsibility to oversee the complaint process. When asked who handles complaints, the managers said, "We all do." After further discussion, one member of the management team was identified as overseeing complaints. However, it was questionable whether this individual's multiple other management responsibilities realistically enabled him to devote sufficient time to overseeing the complaint process.

Furthermore, there is an inconsistency between: GRTA's policy that states individuals may file complaints by phone, email or in person; and the agency's formal complaint form that states, "All complaints must be in writing."

A team member reviewed sample complaint files from 2019. The files were often missing significant information about complaints filed, including showing that the no course of action or resolution were taken in the majority of complaints filed.

Finally, GRTA did not have a summary of complaints over the past five years.

**Corrective Actions and Schedule:** Within 60 days of receiving the final report, GRTA must designate an individual (or specific job position) who will be responsible for coordinating GRTA's activities related to accepting, resolving, and responding to complaints.

GRTA must also clarify its process for submitting complaints; this process must be accessible to and usable by individuals with disabilities.

GRTA must also maintain a file of all complaints and responses to complainants for one year.

GRTA must also maintain a record of all ADA-related complaints for GRTA paratransit service (these can be in summary form) for the most recent five years.

## 6.8 Nondiscrimination

**Requirement:** Under 49 CFR §37.5, the transit agency is prohibited from discriminating against an individual with a disability in connection with the provision of transportation service, or denying any individual with a disability the opportunity to use the transportation services it provides to the general public. Discriminatory practices include and are not limited to requiring the use of alternate transportation services, requiring persons with disabilities to be accompanied by an attendant, imposing user fees or special charges upon people with disabilities, and requiring people with disabilities to use designated priority seating.

**Discussion:** During this review, deficiencies were found with GRTA's non-discrimination policies and practices. GRTA places improper restrictions on paratransit riders with respect to maintaining an oxygen supply.

Deficiencies were found with the provision enabling an agency to refuse to provide service to an individual with disabilities only if that individual's conduct is violent, seriously disruptive, or illegal, or poses a direct threat to the safety or health of others. The review team examined the GRTA policy regarding suspension of service for reasons of rider conduct, and found that several criteria for refusal of service, immediate suspension of service, and suspension of service do not meet the regulatory thresholds.

Deficiencies were also found concerning GRTA policies concerning accommodating a rider when the combined weight of a rider and the rider's wheelchair exceeds 600 pounds.

No deficiencies were found with GRTA's public information or with policies related to alternate transportation services, requiring persons with disabilities to be accompanied by an attendant, imposing user fees or special charges upon people with disabilities, or requiring people with disabilities to use designated priority seating.

Advisory comments are offered regarding GRTA policies concerning the condition of a rider's mobility equipment.

The Rider's Guide includes the following language about refusal or suspension of service:

### **Refusal of service**

Operators may refuse service to an individual on a specific occasion at the point of service if the individual's conduct poses an immediate actual or potential risk to safety of the customer, the operator or others.

### **Immediate suspension of service**

Immediate suspension of service may occur when a customer's conduct:

- inflicts serious harm on a customer, GRTA or provider employee, or others,
- results in serious damage to GRTA or contracted provider property,
- creates an immediate actual risk to safety or
- constitutes an illegal activity

**Suspension of service**

Service suspensions for a pattern of behavior generally are imposed for a specified length of time, and only after the customer has been previously warned. The suspension will begin on a specific date after the customer has been informed in writing of the pending suspension and the basis for it and has had an opportunity to present information relevant to the pending suspension.

Conduct that may lead to suspension includes but is not limited to the following:

- **No-Show.** A demonstrated pattern of no-shows (late cancellations of unneeded rides, not present or ready to board when the vehicle arrives) is seriously disruptive to paratransit service. Within a 30-day period, three or more no-shows, OR no-shows which are 10 percent of completed trips (whichever is greater), will be cause for service suspension. Only no-shows and late cancellations that are within the customer's control will be counted toward the policy. Cancellations made less than 1 hour in advance of the pick-up time, a cancellation at the door, or not being present or ready to leave within five minutes after the vehicle operator comes to the door are all considered no-show. If a customer is a no-show on a ride starting from their home, they must call dispatch to cancel any other scheduled rides no longer needed that day to avoid receiving additional no-shows.
- **Disruption of Service.** A demonstrated pattern of behavior that disrupts service will result in a suspension of service. Disruptive behavior includes, but is not limited, to failure to remain seated while a paratransit vehicle is in motion, or refusing to board or disembark the vehicle in a timely manner.
- **Non-Payment of Fare.** Failure to present the required fare when boarding a vehicle is in violation of GRTA's fare policy. A demonstrated pattern of fare non-payment is considered grounds for service suspension.

The paratransit coordinator noted that only one rider has been suspended for conduct—indefinite suspension for an altercation with another rider—and that suspension was overturned on appeal.

ADA regulations permit transit agencies to refuse service to riders due to conduct issues, but conduct must be violent, seriously disruptive, or illegal, or pose a direct threat to the safety or health of **others** (not self). Therefore, immediate actual or potential risk to the safety of the customer is not a valid reason to refuse service. While a pattern of fare evasion does not necessarily represent violent, seriously disruptive, or illegal, or a direct threat to the safety or health of others, we note that service can still be refused on the basis of nonpayment of fare (just as a fixed route driver may refuse service to a boarding patron who refuses to pay the fare), and that repeated instances of reserving trips while continually refusing to pay the fare when the vehicle arrives could rise to the level of becoming seriously disruptive to service.

The Rider's Guide (pages 12–13) presents policies concerning items that a rider can carry onto a GRTA paratransit vehicle. For oxygen tanks, the policies specify that “customers must ensure that there is an adequate oxygen supply (3/4 of full) before boarding.” While GRTA may recommend such a practice, GRTA must not require nor enforce this policy.

GRTA has an “ADA Program Policy Plan” on its website (<http://grta.guam.gov/about-us/standard-operating-procedure/ada-program-policy-plan>) that sets forth the agency’s accessibility policies and procedures for both fixed route and paratransit service. In the plan’s discussion of “Approved Equipment,” it states “equipment **should** be in good working order, with batteries charged, tires inflated, brakes working, footrests attached, and all parts secure” [emphasis added].

The plan also includes the following statements:

- All wheelchairs or mobility aides [sic] and occupant that can be accommodated on the lift or ramp will be transported
- The equipment must not weigh more than 600 [lbs.] pounds when occupied. GRTA may decline a wheelchair/occupant if the combined weight exceeds that of the lift specifications or if the carriage of the wheelchair is demonstrated to be inconsistent with legitimate safety requirements

The first statement is consistent with the DOT ADA regulations. The second statement, by restricting the combined weight of the rider and wheelchair to 600 pounds, is not consistent with the first statement. The minimum load that GRTA’s lifts and ramps must accommodate is 600 pounds; however, if the rated load of GRTA’s lifts and ramps is greater than 600 pounds, GRTA must accommodate a rider and the wheelchair up to that rated load.

**Corrective Action and Schedule:** Within 60 days of the issuance of the final report, GRTA must submit a revised policy regarding suspension of service due to rider conduct if that conduct does not involve the health and safety of another rider. GRTA must also revise the suspension policy due to a pattern of non-payment of fare unless a comparable policy applies to riders of GRTA’s fixed route bus service. GRTA must also provide evidence that public information materials have been revised to reflect the amended policy.

Within 60 days of issuance of the final report, GRTA must also revise its policy concerning oxygen tanks so that it no longer places any requirements on the amount of oxygen in the tank. GRTA must present this new policy to FTA and update all public information concerning this policy.

**Advisory Comment:** It is an effective practice for GRTA to clarify that its policy concerning the condition of a rider’s mobility equipment is a recommendation and not a requirement.

## 6.9 Training Requirements

**Requirement:** Under 49 CFR §37.173, each public or private entity which operates a fixed route or demand responsive system shall ensure that personnel are trained to proficiency, as appropriate to their duties, so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service in a respectful and courteous way, with appropriate attention to the difference among individuals with disabilities.

**Discussion:** During this review, deficiencies were found with the requirement to train personnel to proficiency as appropriate to their duties or with how GRTA communicates, manages, and/or oversees training requirements with respect to staff or contractors. The review team discussed GRTA's training requirements with the GRTA transportation supervisor and driver supervisor, who have been responsible for training operators since GRTA began operating service directly in January 2020, and examined training logs from January 2019 and October 2017 to September 2018. Training requirements for operators are comprehensive, and records indicate that individuals are receiving the required training. Schedulers and dispatchers seem to have been well trained in procedures and customer service (although while observing reservations and dispatch, the review team observed that some members of the staff believed the pickup window to be -15/+15 minutes). However, the paratransit coordinator, who has been responsible for making paratransit eligibility determinations since April 2019, indicated that she would feel more comfortable in that role with more training. The issues related to the determinations of unconditional and conditional eligibility discussed earlier suggest that formal training in the eligibility determination process would be useful.

Approximately half of the operators who provided GRTA paratransit service as employees of the former contractor were hired by GRTA. A review of training logs submitted by GRTA prior to the site visit indicated that employees of the former contractor received training on the following topics:

- Wheelchair lift and passenger safety (PAT)
- Defensive driving and pre-trip inspection
- Drug and alcohol awareness
- Renal training
- Sexual harassment

Moving forward, GRTA's training curriculum for newly hired operators includes:

- Passenger Assistance Safety and Sensitivity (PASS) with annual refresher, provided by Guam Community College
- First Aid
- CPR
- Defensive driving, provided by the Guam Public Safety Educator
- Operating procedures: pre-trip inspections, lift and ramp operation, fare collection, emergency procedures

Topics covered in the PASS and defensive driving courses include:

- Customer service, communication, and stress management
- Distracted driving and driver fatigue
- Transit employee occupational safety and health
- ADA
- Service animals
- Disability awareness



- Blood-borne pathogens
- Emergency and evacuation procedures
- Driver/Passenger sexual improprieties
- People first language

New operators spend two to three hours in classroom training and four hours in a hands-on practical session. They are then assigned to either ride with or be shadowed by an experienced operator for about three days.

Training is reinforced through safety briefs that occur almost daily. Information is posted on a whiteboard; operators sign a safety brief document to acknowledge receipt of the information.

At the time of the site visit, the transportation supervisor was in the process of developing new training and safety plans. Drug and alcohol awareness will be a component of the new training plan. In addition, GRTA will utilize National RTAP training modules as appropriate to the duties of different staff positions.

GRTA schedulers and dispatchers were originally trained by the individual who was the lead dispatcher for the contractor that operated the GRTA paratransit service until January 2020. The GRTA transit management center supervisor took over staff training when she assumed her position.

Team member interviews with GRTA drivers confirmed that drivers understand most of their responsibilities, particularly with regard to providing assistance to riders as needed. However, none of the drivers interviewed could correctly describe the window for on-time pickups.

**Corrective Action and Schedule:** Within 60 days of receiving the final report, GRTA must ensure that individuals with the responsibility of evaluating applications for ADA complementary paratransit service understand eligibility criteria and categories as well as the other regulatory requirements for an eligibility determination process. GRTA must document the training provided to these individuals.

GRTA must also ensure that drivers, as well as all staff in operations, know and understand the window for on-time pickups.

## 6.10 Service Under Contract with a Private Entity

**Requirement:** Under 49 CFR §37.23, the transit agency must ensure that any private entity with which it has entered into a contract or other arrangement to provide ADA paratransit service meets all the obligations of the DOT ADA regulations, including those for service provision and vehicle acquisition, that the transit agency would be required to meet, if it provided the service directly.

The transit agency must have policies and procedures in place to monitor the performance of its contractor(s) and ensure that these requirements are met. The transit agency is not permitted to

neglect monitoring or to limit its monitoring to the terms and conditions of its contract or other arrangement with the private entity or entities.

**Discussion:** During this review no deficiencies were found with regard to ADA compliance issues for contracted ADA complementary service, including and not limited to service provision and vehicle acquisition, or with how the transit agency communicates, oversees and/or manages its obligations concerning contracted service with respect to eligible riders, applicants and potential applicants. This requirement is not applicable to GRTA. GRTA does not rely on any other public entities to provide ADA paratransit service.

## 6.11 Service Provided by Another Public Entity

**Requirement:** Part 37 of title 49, Code of Federal Regulations, applies to any public entity that provides designated public transportation or intercity or commuter rail transportation. Under 49 CFR §37.21(b), for entities receiving federal financial assistance from the Department of Transportation, compliance with the applicable requirements of Part 37 is a condition of §504 of the Rehabilitation Act of 1973 and of receiving financial assistance. Where a transit agency relies on another public entity to provide complementary paratransit service on its behalf, the transit agency remains responsible for meeting the requirements of 49 CFR Part 37. In other words, a transit agency must ensure that the service provided on its behalf meets all of the requirements that the transit agency would be required to meet, if the transit agency provided the service directly. The transit agency must have policies and procedures in place to monitor the performance of such service to ensure that these requirements are met; the transit agency is not permitted to defer to the public entity operating the service.

**Discussion:** During this review, no deficiencies were found with regard to ADA compliance issues of service provided by an entity receiving federal financial assistance from the Department of Transportation on behalf of another entity receiving such assistance or with how the transit agency communicates its obligations concerning contracted service to eligible riders, applicants and potential applicants. This requirement is not applicable to GRTA. GRTA does not rely on any other public entities to provide ADA paratransit service.

## 6.12 Coordination of Service

**Requirement:** Under 49 CFR §37.139(g), public transit operators were required to address efforts to coordinate service with other fixed route operators with overlapping or contiguous service areas or jurisdictions when developing their complementary paratransit plans. Coordination is an ongoing process; while these efforts are likely to have evolved over time, it is expected that such transit agencies will have a mechanism in place to ensure that paratransit riders have an ability to make interjurisdictional trips on a comparable basis to individuals using the fixed route system.

**Discussion:** During this review, no deficiencies were found with how GRTA coordinates service with other fixed route operators with overlapping or contiguous service areas or jurisdictions. This requirement is not applicable to GRTA. GRTA does not have a fixed route operator with an overlapping or adjacent service area.

## Summary Table of Compliance Review Findings

Item	Requirement of Part 27 or 37 or 38	Reference	Site Visit Finding Deficiency/ No Deficiency or Advisory Comment	Finding(s) of Deficiency	Response Days/ Date*
1	Comparable paratransit service	37.121	No deficiencies		
2	Absence of administrative burden	37.125 & 37.5	No deficiencies		
3	Paratransit eligibility standards	37.123(e) (1)-(3)	2 deficiencies 2 advisory comments (see report text)	GRTA confers unconditional and conditional eligibility on the basis of specific disabilities or medical conditions, rather than on functional ability to use fixed route service  GRTA's paratransit eligibility application form requests information that is not needed for a determination of eligibility	60 days
4	Accessible information	37.125(b)	No deficiencies		
5	Eligibility determinations within 21 days	37.125(c)	1 deficiency	Presumptive eligibility after 21 days is not automatic; riders must call GRTA if they have not received a determination in 21 days	60 days
6	Written eligibility determinations including specific reasons for denials or temporary or conditional eligibility	37.125(d)(e)	2 deficiencies 1 advisory comment (see report text)	GRTA does not retain copies of eligibility determination letters. Copies of a sample of future letters are needed to verify that letters regarding denials, temporary, and conditional eligibility contain specific reasons for the decision  GRTA does not include a copy of its appeal policy with its determination letters that confer less than unconditional eligibility	60 days
7	Recertification of eligibility at reasonable intervals	35.125(f)	No deficiencies		

Item	Requirement of Part 27 or 37 or 38	Reference	Site Visit Finding Deficiency/ No Deficiency or Advisory Comment	Finding(s) of Deficiency	Response Days/ Date*
8	Administrative appeals process for denials and conditional eligibility	37.125(g)	1 deficiency	The Appeals Committee includes the GRTA Executive Manager, who is the supervisor of the individual who makes eligibility determinations	60 days
9	Complementary paratransit for visitors	37.127	1 deficiency	Requirements for visitors who do not have credentials from another paratransit system are incorrectly stated in public information materials	60 days
10	Types of service	37.129	No deficiencies		
11	Service area	37.131(a)	No deficiencies		
12	Response time	37.131(b)	No deficiencies		
13	Fares	37.131(c)	No deficiencies		
14	No trip purpose restrictions	37.131(d)	No deficiencies		
15	Hours and days of service	37.131(e)	1 deficiency	GRTA does not accept trip requests with pickup times within an hour of the end of the service hours of its fixed route bus service	60 days
16	Absence of capacity constraints	37.131(f)	See #17–#22		
17	No restrictions on the number of trips provided to an individual	37.131(f)(1)	No deficiencies		
18	No waiting list for access to the service	37.131(f)(2)	No deficiencies		
19	No substantial numbers of significantly untimely pickups for initial or return trips	37.131(f)(3)(i)(a)	No deficiencies 3 advisory comments (see report text)		

Item	Requirement of Part 27 or 37 or 38	Reference	Site Visit Finding Deficiency/ No Deficiency or Advisory Comment	Finding(s) of Deficiency	Response Days/ Date*
20	No substantial numbers of trip denials or missed trips	37.131(f) (3)(i)(B)	3 deficiencies	GRTA's scheduling procedures have led to denials  GRTA does not properly track and count denials  GRTA does not properly track and count missed trips	60 days
21	No substantial numbers of trips with excessive trip lengths	37.131(f) (3)(i)(C)	1 deficiency 1 advisory comment (see report text)	GRTA's trip length standard is based on an absolute maximum time (two hours) rather a comparison to comparable fixed route travel times	60 days
22a	No operational patterns or practices significantly limiting service availability (telephone hold times)	37.131(f)	1 deficiency 2 advisory comments (see report text)	GRTA does not collect data to monitor telephone hold times	60 days
22b	No operational patterns or practices significantly limiting service availability (untimely drop-offs)	37.131(f)	1 deficiency 2 advisory comments (see report text)	Based on available data, it appears that GRTA has low performance for on-time drop-offs	60 days
23	Subscription Service	37.133	1 deficiency	Based on poor drop-off performance, GRTA may need to adjust subscription trips to not exceed 50 percent capacity constraints exist	60 days

Item	Requirement of Part 27 or 37 or 38	Reference	Site Visit Finding Deficiency/ No Deficiency or Advisory Comment	Finding(s) of Deficiency	Response Days/ Date*
24	No-show, late cancel and reasonable service suspension & appeal policies	37.125(h) (1)-(3)	4 deficiencies 1 advisory comment (see report text)	<p>Several no-show and late cancel policies contain different definitions of a no-show and late cancel and thresholds for suspension of service. Some of the thresholds for service suspension are overly stringent and do not amount to a “pattern or practice of missing scheduled trips”</p> <p>Different appeal procedures are described in the policies</p> <p>Public information materials do not include consistent, complete, and accurate information regarding suspensions of service</p> <p>Riders may be suspended for an indefinite period of time for the highest level of no-shows</p>	60 days
25	Complaint Resolution & Compliance Information	27.13(a)(b) & 27.121	4 deficiencies	<p>GRTA has not designated an individual to be responsible for complaint activities</p> <p>GRTA’s policies for submitting complaints are not consistent</p> <p>GRTA does not maintain records of complaint resolutions and responses</p> <p>GRTA does not maintain a summary of five years of ADA-related complaints</p>	60 days

Item	Requirement of Part 27 or 37 or 38	Reference	Site Visit Finding Deficiency/ No Deficiency or Advisory Comment	Finding(s) of Deficiency	Response Days/ Date*
26	Nondiscrimination	37.5	3 deficiencies 1 advisory comment (see report text)	<p>GRTA has policies that may improperly lead to a suspension of service for: behavior that is unsafe to the rider himself; and a pattern of non-payment of fares</p> <p>GRTA improperly requires that a rider with an oxygen tank ensures that the tank is 3/4-full</p> <p>GRTA limits the combined weight of a rider and his or her mobility device to 600 pounds, but does not account for vehicles whose ramp or lift may have a capacity greater than 600 pounds</p>	60 days
27	Training	37.173	1 deficiency	<p>Paratransit coordinator needs training in eligibility determination process</p> <p>GRTA paratransit drivers and some reservations/dispatch staff do not know or understand the window for on-time pickups</p>	60 days
28	Service under contract with a private entity	37.23	Not applicable		
29	Service provided by another public entity	37.21(b)	Not applicable		
30	Coordination of service	37.139(g)	Not applicable		

**Attachment A**

**FTA Notification Letter to Guam Regional Transit Authority**





U.S. Department  
of Transportation  
**Federal Transit  
Administration**

Headquarters

East Building, 5th Floor, TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

November 8, 2019

Celestin C. Babauta  
Interim Executive Manager  
Guam Regional Transit Authority  
P.O. Box 2896  
Hagatna, Guam 96932

Dear Mr. Babauta:

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the Americans with Disabilities Act of 1990 (ADA) and the Department of Transportation's (DOT) implementing regulations of 49 CFR Parts 27, 37, 38, and 39 as they apply to public transportation. As part of its ongoing oversight efforts, FTA through its Office of Civil Rights conducts on-site ADA specialized reviews of grant recipients. The Guam Regional Transit Authority (GRTA) has been selected for a review of its complementary paratransit service to take place March 3–6, 2020.

The purpose of this review will be to determine whether the GRTA is meeting its obligations to provide paratransit service as a complement to its fixed route bus service in accordance with the service criteria and eligibility requirements contained in Subpart F of 49 CFR Part 37, and other related requirements contained in 49 CFR Parts 27, 37, 38 and 39.

The review process includes data collection prior to the on-site visit, an opening conference, an on-site analysis of the complementary paratransit service, and an exit conference. The entire on-site portion of the review will be completed within four days. FTA has engaged the services of the Collaborative, Inc., of Boston, MA, to conduct this specialized review. Representatives of the Collaborative and FTA will participate in the opening and exit conferences, with FTA participating by telephone.

We request an opening conference at 9 a.m. Chamorro Standard Time (ChST), on Tuesday, March 3, 2020 to introduce the Collaborative team and FTA representatives to the GRTA. Attendees should include you or your designee, the paratransit service manager, the ADA coordinator, and other key staff. During the opening conference, the review team members will present an overview of the on-site activities.

Because review team members will spend considerable time on site during the week, please provide them with temporary identification and a workspace within or near your offices for the duration of their visit. Please let us know if you will designate a member of your staff to serve as GRTA's liaison with the review team and coordinate the on-site review and address questions that may arise during the visit.

So that we may properly prepare for the on-site visit, we request that you provide the information described in Enclosures 1 and 2. Enclosure 1 consists of items that must be received within 30 calendar days of the date of this letter. Please forward these materials to the following contact person:

Mr. David Chia  
the Collaborative, Inc.  
122 South Street  
Boston, MA 02111  
617-338-0018, ext. 17  
*dchia@thecollaborative.com*

Enclosure 2 consists of items that the Collaborative team will review on-site beginning on March 3, after the opening conference.

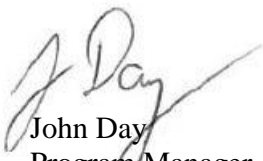
FTA requests your attendance at an exit conference scheduled for 1 p.m. ChST, on Friday, March 6, 2020. The exit conference will afford an opportunity for the reviewers to discuss their observations with you and your agency. We request that you or your designee, the paratransit service manager, the ADA coordinator, and other key staff attend the exit conference.

The FTA Office of Civil Rights will make findings and will provide them to you in a draft report. You will have an opportunity to correct any factual inconsistencies before FTA finalizes the report. The draft and final reports, when issued to the GRTA, will be considered public documents subject to release under the Freedom of Information Act, upon request.

GRTA representatives are welcome to accompany the review team during the on-site activities, if you so choose. If you have any questions or concerns prior to the opening conference, please contact me at (202) 366-1671, or via email at *john.day@dot.gov*.

Thank you in advance for your assistance and cooperation as we undertake this process. We look forward to working with GRTA staff.

Sincerely,



John Day  
Program Manager  
FTA Office of Civil Rights

Enclosures (2)

cc: Ray Tellis, Regional Administrator, FTA Region 9  
Selene Faer Dalton-Kumins, Associate Administrator, FTA Office of Civil Rights

## **Enclosure 1: Pre-Site Visit**

**The following information must be submitted to the Collaborative within 60 calendar days from the date of this letter.**

1. A description of how ADA complementary paratransit service is structured and provided, including:
  - How trip requests/reservations are handled (by a central reservation office? by the contractor?) and the address(es) where reservations are taken
  - How trips are scheduled (by a central scheduling office? by the contractor?) and the address(es) of the scheduling office(s).
  - How dispatching is handled (centrally? by the contractor?) and the address of the central dispatch office or the contractor's dispatch office(s).

Note that the Collaborative may contact you in advance to discuss this first question.

2. A copy of the current carrier and broker contract(s), if service is contracted out
3. A copy of the ADA complementary paratransit drivers manual
4. A copy of the ADA complementary paratransit application and materials, including procedures for visitor service
5. Written description of the agency's ADA eligibility appeal process
6. Copies of the ADA complementary paratransit riders guide and/or service brochure, or other documents that explain to the public and eligible riders how trips are requested and how service is provided
7. A copy of the agency's no-show suspension policy, if applicable
8. A description of the complementary paratransit service standards, including:
  - The on-time performance standards for pickups and drop-off (how is "on-time" defined and what is the goal for the percentage of trips to be provided within each standard?)
  - Trip denials and missed trips (how are these defined and what is the transit agency's standard regarding acceptable numbers or percentages of trip denials or missed trips?)
  - Travel time (on-board time) standards, including maximum travel time (if applicable) (how is this defined? what travel time is considered comparable to fixed route and what travel time is considered excessive? What are the agency's goals for the percentages of trips to be provided within each standard?)
9. Telephone call-handling performance standards for calls to reservations and dispatch, including:
  - Maximum and standard queue/hold times
  - Call pick up time
  - Calls abandoned
  - Goals for percentage of calls to be answered within these established standards

10. Copies of completed driver manifests for the most recent two-month period scanned or in electronic form (for each of the agency's contractors, if applicable)
11. Capital and operating budget and expenditure information for complementary paratransit service for the three most recent fiscal years, including the current federal fiscal year
12. The number of complementary paratransit trips, requested, scheduled, provided, and trips denied for the three most recent fiscal years, including the current federal fiscal year
13. Three copies of the fixed route system map

## **Enclosure 2: On-Site Visit**

**We request that the following information and/or assistance be available at the beginning of the on-site visit:**

1. The following complementary paratransit data, by month, for the most recent six-month period (paper copies as well as in electronic format, if available):
  - Trips requested
  - Trips scheduled
  - Trips denied
  - Canceled trips
  - Passenger no-shows
  - Carrier missed trips
  - Trips provided
  - An itemization of trips requested, scheduled, and provided by recognized geographic areas, communities, or zones
  - A listing of trips denied each month showing:
    - customer's name
    - origin
    - requested destination
    - date and time
    - if the person was ambulatory or used a wheelchair
  - On-time performance information
  - A listing of trips that exceeded the 60 minutes, showing:
    - the customer name
    - origin
    - destination
    - date and time
    - if the person was ambulatory or used a wheelchair
    - total time on-board
  - A listing of passenger no-shows and carrier missed trips for the last month with negotiated pickup times and actual vehicle arrival and departure times
  - Telephone call management records (if available), showing:
    - hold times by date and time
    - total call volume
    - calls answered
    - calls abandoned
    - other call management performance data maintained
  - Copies of completed driver manifests (for each of the agency's contractors, if applicable)

2. A list of complaints by month for the last 12 months related to ADA complementary paratransit service. The list should include all complaints related to trip denials, missed trips, wait lists, trip caps, trip restrictions or limits, on-time performance, lengthy trips, phone capacity issues, etc. The list should show:
  - customer's name
  - nature of complaint
  - date of trip request, if applicable
  - requested trip origin, destination, date and time
  - scheduled trip time (if applicable) and carrier
  - date complaint submitted and format (phone, letter, email, in person)
  - resolution and any corrective action taken (any corrective actions requested and taken)
3. The following ADA paratransit eligibility information:
  - Copies of eligibility guidelines and policies and any assessment or interview forms
  - Sample letters of all types of determination (unconditional, conditional, temporary, trip eligible, if applicable)
  - Other letters related to receipt of applications, incomplete applications, eligibility appeals and other eligibility issues
  - Total number of ADA paratransit eligible individuals
  - Any documentation, policies, procedures and correspondence related to service suspensions for passenger no-shows
  - Access to eligibility files and appeals records
  - For most recent 12 months:
    - Number of applications received
    - Number of completed application considered and processed
    - Number of applications determined incomplete
    - Number of people determined unconditionally eligible
    - Number of people determined conditionally eligible
    - Number of people determined temporarily eligible
    - Number of people determined ineligible
    - Number of eligibility appeals and outcomes
4. Work shift assignments for reservationists (call-takers), schedulers, dispatchers, and drivers
5. Access to personnel records showing hire and termination dates for reservationists (call-takers), schedulers, dispatchers, drivers, and road supervisors
6. Current complementary paratransit fleet roster with vehicle type, make and model year and odometer reading, (designating whether the vehicles are accessible or inaccessible), numbers of accessible and inaccessible spares. For each accessible vehicle, please include the design load of the lift or ramp
7. Run structure (vehicles in service by hour of day)

8. Access to the most recent six months of daily vehicle pullout records showing late pullouts and closed runs
9. Vehicle availability reports for most recent six months
10. Copies of vehicle pre-trip inspection and preventative maintenance form(s)
11. Assistance with viewing and capturing parameters used in the scheduling software
12. Assistance with viewing and collecting data on vehicle run structures and peak pullout requirements
13. Subscription trips by hour
14. Training curricula for each type of complementary paratransit employee
15. Procedures for providing information and communication in accessible formats

**Attachment B**  
**Guam Regional Transit Authority Response to Draft Report**



**Chia, David**

---

**From:** Celestin Babauta <celestin.babauta@grta.guam.gov>  
**Sent:** Monday, January 25, 2021 4:12 PM  
**To:** Day, John (FTA)  
**Cc:** Tellis, Ray (FTA); Sun, Nicholas (FTA); Nelson, Shavon (FTA); Heard, Anita (FTA); Mitchell, Yolanda CTR (FTA); Patti Monahan; Chia, David  
**Subject:** Re: Draft Report: Guam GRTA ADA Paratransit Review

Hello Mr. Day,

Thank-you very much for the report! We have reviewed the draft report and found it to be informative; we do not have any corrections that need to be made.

Best Regards,  
Celestin (Cel) C. Babauta, MS WED  
Executive Manager  
(671) 300-7260

**GUAM REGIONAL TRANSIT AUTHORITY**  
GOVERNMENT OF GUAM



P. O. Box 2896 Hagatna, Guam 96932 Tel: (671) 475-4616/4686 Fax: (671) 475-4600

On Wed, Jan 13, 2021 at 5:55 AM Day, John (FTA) <[John.Day@dot.gov](mailto:John.Day@dot.gov)> wrote:

Dear Mr. Babauta-

Attached for your advance review is the draft report for the ADA paratransit review of the Guam Regional Transit Authority (GRTA) , which was conducted on March 3-6, 2020. Please check for any factual errors and reply via email to this message. We ask that you provide any corrections by January 22.

We are seeking corrections to factual errors only; **please do not submit corrective actions at this time.** If you have no corrections, please let me know.

Best Regards,

## **John Day**

*Program Manager, Policy & Technical Assistance* | Office of Civil Rights

Federal Transit Administration | U.S. Department of Transportation

1200 New Jersey Ave., SE, Room E-54-310 | Washington, DC 20590

☎ 202.366.1671 | ✉ [john.day@dot.gov](mailto:john.day@dot.gov) | 🌐 [www.transit.dot.gov](http://www.transit.dot.gov)

**Attachment C**  
**GRTA Paratransit Rider's Guide**

## **VI. ADA Paratransit Rider's Guide**

- Service Brochure
- New Bus Fare Rates
- Holiday Schedule
- Rider's Guide



## BUS FARES DISCOUNTED FARE PASSES / PARATRANSIT FARES

NEW BUS FARES AS 8.01.2018

**Students 6-18 years**  
**Seniors 55 years & Up**  
**ADA Certified persons with disabilities**

One Ride	=	.50
One Day Pass	=	\$ 1.50
One Week Pass	=	\$ 7.50
One Month Pass	=	\$25.00

*There are no credits or extensions for all  
Passes.*

*All purchased Bus Pass/Coupon/Tickets  
are non-refundable.*

## REGULAR FARE PASSES

One Ride	=	\$ 1.50
One Day Pass	=	\$ 4.00
One Week Pass	=	\$20.00
One Month Pass	=	\$65.00

## ADDITIONAL INFORMATION

Be prepared to pay exact fare. Drivers do not carry change and are not allowed to handle cash.

Passengers must place his/her bus fare in the Fare Box.

Passengers must present identification card (ID) to the driver to receive a discounted fare rate.

If you do not pay for your fare or if you do not present a prepaid ticket to the driver you will not be allowed to board a bus.

There are no credits or extensions for passes not utilized during a validation period.



**GRTA**  
Guam Regional Transit Authority

# RIDERS INFORMATION

GRTA Publication update: 13 Aug 2019

## OVERVIEW OF SERVICES

**Fixed Route**  
**Paratransit**  
**Rider's Responsibility**  
**Bus Fares**

### For more information:

Website: [grta.guam.gov](http://grta.guam.gov)

Telephone: 475 - 4686

475 - 4616

542 North Marine Corp Drive

DPW Compound

Upper Tumon, Guam 96913

# Guam Regional Transit Authority

The Guam Regional Transit Authority (GRTA) operates six (6) Fixed Route Buses and (6) Paratransit Buses.

## Fixed Route Service

The Fixed Routes are comprised of Six (6) buses that operate on a Fixed schedule with designated stops between major transfer stations.

The Fixed Routes are GreyLine, GreyLine 2, GreenLine, BlueLine 1, BlueLine 2, BlueLine Express, RedLine and OrangeLine.

## Paratransit Service

Paratransit service is provided to ADA Eligible Certified passengers. Certification is a requirement of this service and an application can be obtained at the GRTA Office in Upper Tumon.

**Reservations** for use of this service must be made during normal business hours (8am - 5pm), One (1) to Two (2) days in advance.



For medical appointments only, Paratransit Riders may call GRTA dispatcher Two (2) weeks in advance of appointment date to schedule. The Telephone no. is 647-7433 - 35.



Six (6) service vehicles are dedicated for Paratransit.

## Hours of Operations

**Monday - Saturday**  
5:30 am - 7:30 pm.

**Sundays and Holidays**  
Closed.

*Note: Scheduler for Paratransit Reservation is available 7 days a week 8:00am - 5:00pm.*

## Holidays Observed

(Please note: No transit operating on these days.)

<b>Memorial Day</b>	
May 27, 2019	Monday
<b>Independence Day</b>	
July 4, 2019	Thursday
<b>Labor Day</b>	
September 2, 2019	Monday
<b>Thanksgiving Day</b>	
November 28, 2019	Thursday
<b>Christmas Day</b>	
December 25, 2019	Wednesday
<b>New Year's Day</b>	

## Call for a Ride

To call for a ride contact Kloppenburg Enterprise, Inc. dispatchers at 647-7433, 647-7434 or 647-7435

## Riders Responsibility

Passengers must be at the designated stop for pick up, please keep in mind that unexpected delays can happen because of such things as traffic jams, road constructions, bad weather, etc.

Passengers must have identification card (if applicable), fare pass/coupon/ticket, or the exact amount of money readily available for presentation for a bus ride prior to boarding a bus.

## Follow These Common Rules of Courtesy

No eating, drinking or smoking on board the vehicles.

No riding under the influence of alcohol or illegal drugs.

No littering in the vehicles.

No radios, cassette tape players, compact disc players or other sound generating equipment may be played aloud aboard the vehicles.

**AVOID DISTRACTING AND ANNOYING THE DRIVER AND OTHER PASSENGERS**





## Bus Fare Increase will take effect August 1, 2018

### DISCOUNT FARE

Students 6-18 years of age  
Seniors 55 years and older

ONE RIDE = \$ 0.50

ONE DAY Pass = \$ 1.50

ONE WEEK Pass = \$ 7.50

ONE MONTH Pass = \$ 25.00

### PARATRANSIT FARE

#### ADA CERTIFIED

Individuals with Disabilities

ONE RIDE = \$ 0.50

ONE DAY Pass = \$ 1.50

ONE WEEK Pass = \$ 7.50

ONE MONTH Pass = \$ 25.00

### REGULAR FARE

ONE RIDE = \$ 1.50

ONE DAY Pass = \$ 4.00

ONE WEEK Pass = \$ 20.00

ONE MONTH Pass = \$ 65.00



## 2020 Holiday Calendar Guam Regional Transit Authority

Holiday	Day Observed	Day of the Week
Thanksgiving Day	November 28, 2019	Thursday
Christmas Day	December 25, 2019	Wednesday
New Year's Day	January 1, 2020	Wednesday
Martin Luther King Jr.	January 20, 2020	Monday
Memorial Day	May 25, 2020	Monday
Independence Day	July 4, 2020	Saturday
Labor Day	September 7, 2020	Monday
Veteran's Day	November 11, 2020	Wednesday
Thanksgiving Day	November 26, 2020	Thursday
Christmas Day	December 25, 2020	Friday

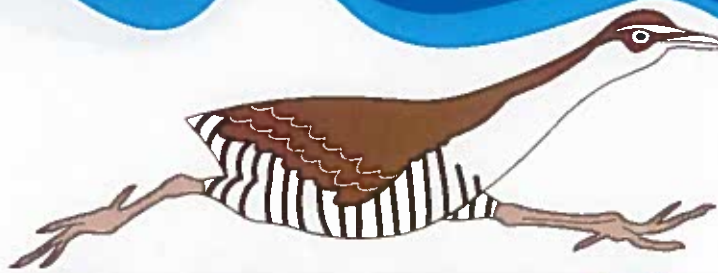
### DAYS OF OPERATIONS

Monday - Saturday 5:30 a.m. - 7:30 p. m.

NO Service on Sundays







# **GRTA**

**GUAM REGIONAL TRANSIT AUTHORITY**

## **PARATRANSIT RIDER'S GUIDE**

**YOUR FREEDOM TO MOBILITY**

***Nihi Ta' fan Hanao!***

**PARATRANSIT SERVICE**

**Contact Numbers**



**Guam Regional Transit Authority**

**Website Address: [GRTA.GUAM.GOV](http://GRTA.GUAM.GOV)**

**Telephone: 475-4686 and 475-4616**

- Eligibility & Registration
- Information and Complaints
- Fare Coupon Purchases

**Contract Provider:**

**Kloppenburg Enterprises, Inc.**

**647-7433, 647-7434 or 647-7435**

- Reservations and Cancellations
- Customer Service and Lost & Found



Dear Rider,

Hafa Adai! GRTA's Paratransit service is a transportation service for individuals with disabilities **WHO ARE DETERMINED ELIGIBLE FOR PARATRANSIT SERVICES.**

The purpose of this guide is to assist you in effectively using Guam's public transportation system as a means of mobility to personal freedom. It is user-friendly and provides a guide to understanding the services.

This Rider's Guide does not replace or supersede Guam's Public Transit System Rules and Regulations, Government of Guam statutes and rules, or Federal laws and regulations that govern the operations of paratransit service.

If you wish to obtain a copy of the Guam Public Transit Rules and Regulations, please contact the Guam Regional Transit Authority (GRTA) at 475-4686/4616 or access them and this document online at <http://grta.guam.gov>.

Si Yu'os Ma'ase',  
/S/  
Celestin Babauta  
Interim Executive Manager

# Nihi ta' fan Hanao!

## Let's Go!

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## WHAT IS PARATRANSIT?

GRTA Paratransit Service is a shared-ride, public transportation service for people with disabilities that, due to barriers, are prevented from using GRTA's fixed route bus service for some or all of their trips. Paratransit service operates during the same hours as fixed route service. It is not an emergency transportation service.

## WHO CAN USE PARATRANSIT?

- Paratransit service is available only to people who have a physical and/or mental disability that prevents them from independently using GRTA fixed route buses for some or all of their trips. Eligibility is determined by your functional needs.
- You must apply and be certified as eligible before scheduling a paratransit trip.
- Many paratransit customers find that regular GRTA bus service is their preferred choice for some trips. Choosing fixed route bus service for some trips does not affect paratransit eligibility.

## PARATRANSIT APPLICATION AND ELIGIBILITY

Persons interested in using GRTA's Paratransit service must apply and be determined to be eligible. You may be eligible if your disability prevents you from using fixed route service. Age is not a qualifying factor for eligibility. Application and information packets are available at GRTA or online at <http://grta.guam.gov>.

To be certified as ADA Paratransit eligible, an individual must meet one of the following criteria:

- A specific impairment related condition prevents you from boarding, riding, or disembarking from an accessible vehicle without the assistance of another individual.
- Able to independently board, ride and exit an accessible public transit bus, however, an accessible bus is not assigned to your route.
- A specific impairment related condition prevents you from traveling to or from a stop or station that is serviced by a public transit bus.

## RECERTIFICATION

Under the ADA, transit providers may require that users of paratransit services be periodically recertified. While a person's disability may be permanent, other factors that impact the determination of eligibility may change over time.

Paratransit customers are required to apply for recertification every three years. You will be asked to complete a new application and will be required to complete an in-person evaluation. The evaluation may include an assessment of your functional abilities.

## RENEWAL PROCESS

Upon renewal, applicant must provide the following:

1. Updated application with working phone number and correct address.
2. Updated Signed Doctors Certification.

Photos for ID Card will be taken here at GRTA - applicant does NOT need to provide photos.

## **CHANGE OF RESIDENCE**

In the event you change your residence, GRTA must be informed. A map to your new residence must be submitted to our office, a residential assessment of your new address will then be performed. When the assessment is complete, the dispatcher will be informed via fax of your new residence and then you may use your new residence as your new pick up/drop off points. Dispatchers will only schedule pick up/drop off at your residence that is assessed and noted in GRTA file.

## **REPLACEMENT FEE**

In the event you lose your paratransit ID, you must inform GRTA that you lost your ID and a \$20.00 fee will be assessed.

## **SERVICE AREA & HOURS OF OPERATION**

GRTA provides paratransit services, however, not all areas have guaranteed next day service. Guaranteed next day service is provided to eligible riders within a ¾ mile corridor of any fixed route service area.

GRTA's Paratransit service operates the same days and hours as Guam's fixed route service. Service hours are currently from 5:30 a.m. – 12:30 p.m. and 2:30 p.m. - 8:30 p.m. Paratransit rides may be scheduled up to the last available pick-up window for fixed route service.

There will be no bus service on Sundays and Holidays observed jointly by local and federal offices. The calendar of service operation may be accessed at [www.grta.guam.gov](http://www.grta.guam.gov)

## **GETTING MORE INFORMATION AND ASSISTANCE**

If you need information about eligibility or changes to customer information, please call GRTA's Administration Office at 475-4686 or 475-4616 during the office hours of 8:00 a.m. to 5:00 p.m. If you are connected to a recording message center, leave your name and number and we will return your call.

Schedules for fixed route service and other information may be accessed at our website at [www.grta.guam.gov](http://www.grta.guam.gov).

## **WHAT TO EXPECT FROM PARATRANSIT SERVICE**

- Paratransit is another form of GRTA's public transportation; it is not intended to serve all transportation needs of people with disabilities.
- Other customers share the ride. Vehicles may travel in several directions during your trip and make stops to serve others.
- Advance reservations are required. You may choose to have your trip scheduled based on the time you wish to be picked up or the time you wish to arrive at your destination (referred to as "appointment time").



- Your scheduled pick-up time may be up to 60 minutes earlier or later than you requested in order to accommodate other trips being served.
- You need to be ready to leave throughout your scheduled pickup window. Your pickup window is 10 minutes around your scheduled pickup time. If necessary, the operator will wait a maximum of five minutes past your scheduled time.
- If your vehicle hasn't arrived within 10 minutes of your scheduled pick-up time, call the Dispatcher for information.
- Travel time will vary based on trip distance, traffic conditions and others being served.
- Operators do their best to make pick-ups on time and to get customers to their destinations on time. The system standard for on-time performance is 90 percent or above.
- Operators must be able to park their vehicles in a safe location that does not block or impede traffic. It must allow operators to maintain sight of their vehicle at all times and have an accessible path of travel.
- Service may be delayed by factors outside GRTA's control including heavy traffic, weather, and/or road conditions. Customers may wish to allow for possible delays when scheduling trips.
- Eligible customers may bring a Personal Care Attendant (PCA) with them on their trip. A PCA rides free of charge, provided the space was requested upon reservation.
- Customers may bring one companion in addition to a PCA, provided the space has been requested. Additional companions may be scheduled if space is available. Companions pay the prevailing paratransit fare.

### NEW PARATRANSIT FARES

One Ride	= \$ 0.50 cents
One Day Pass	= \$ 1.50 dollar
One Week Pass	= \$ 7.50 dollars
One Month Pass	= \$ 25.00 dollars

An ADA Paratransit cardholder using GRTA's Paratransit service shall pay a fare of Fifty cents (\$0.50) per one-way trip. If you do not pay your fare upon boarding, or if you do not present a prepaid ticket to the Operator, you will not be permitted to board.

Be prepared to pay exact fare. Operators do not carry change and are not permitted to search purses, pockets, or backpacks for a customer's fare. Fare coupons/passes may be purchased during normal business hours at the Treasurer of Guam and the government's Contracted Provider's Office.

Certified ADA Paratransit riders may use fixed route service for the discounted fare of Fifty (\$0.50) cents, but you must show the Operator your ADA Paratransit I.D. card when boarding a bus.

Passes may be purchase at the Treasurer of Guam window, located at the lobby of the ITC Building and also at GRTA's Administration Office located at DPW's Compound building B. (GRTA location does not accept Debit/Credit Cards.)

## **RESERVATIONS**

Transportation is arranged on a first-come first-served basis. ADA regulations do not permit scheduling according to priority of purpose.

Trip changes after boarding the bus are not permitted. Please be considerate of other riders. Do not ask the Operator to make a change to your scheduled trip.

## **MAKING RESERVATIONS**

You can reserve a ride one or two days in advance of your trip and up to 2 weeks for medical appointments. Rides for the next day must be reserved no later than 5 p.m. the day before. Reservation lines are open from 8:00 am to 5:00 pm daily. Please note that making reservations 2 weeks in advance is only for medical.

You are to make your own reservations and cancellations, unless your disability prevents you from doing so. If that is the case, a person(s) designated on file is permitted to make and cancel your rides for you.

The Scheduler will guide you through the process of reserving your ride. Please be prepared to provide the following information.

- Your name.
- Day and date of the ride.
- Pickup address and phone number.
- Destination address and phone number, including building name and any specific drop off and pickup information. If your pickup location is difficult to find or is on a remote street, provide the Dispatcher with precise directions to the location.
- Your preferred pickup time.
- Your appointment time, if needed.
- The time you will be ready for your return trip. Allow enough time for your appointment to be finished so you won't be listed as a "No Show" on the return trip. If you will be going to a medical appointment, ask the doctor or staff member how long your appointment will take. If you cannot return by your scheduled time, i.e., a return trip from work to home, let the Dispatcher know as soon as is practical.
- Any additional information about your trip such as:
  - You will use a wheelchair, scooter, other mobility aid
  - A Personal Care Attendant (PCA) or other companion(s) will travel with you, or
  - Any other information you feel we should know to safely and comfortably transport you.

## **SETTING YOUR TRIP TIMES**

You can plan your trip around a pickup time *or* an appointment time, but not both.



- Always use a pickup time to schedule your ride unless you must arrive at the destination not later than a certain time, such as for work or a doctor's appointment.
- The Scheduler may negotiate a pickup time with you, but it must be within one (1) hour before or after your requested time, or in time for your appointment or work schedule. Let the call taker know how much flexibility you have regarding your times.

When reserving rides to/from a specific appointment, be sure to:

- Allow for time you may need to get from the paratransit vehicle to your destination inside the building.
- Set your return trip time so that you have sufficient time to finish your appointment and be ready to depart.

Find out about building opening and closing times at your destination and plan your trip so you won't have to wait outside.

The Scheduler will attempt to schedule your ride at the time of your reservations call. However, you may be called later (or you may also call back) to confirm your scheduled pick-up time.

### **Be advised...**

If you are reserving a ride for a specific appointment time, be sure to allow sufficient travel time to get from your pick-up location to your destination. GRTA's Paratransit service is a shared-ride service and other customers may get on or off before you get to your destination.

### **MULTIPLE TRIP RESERVATIONS**

Riders may need to go to several places in one day: home to the doctor's office, office to the library, and then back home. Riders who require multiple trips will need to schedule a separate trip for each pick-up location to each dropoff destination. Please be ready to provide all information necessary to enable the Dispatcher to accommodate your service needs.

### **SUBSCRIPTION RESERVATIONS**

You may request a "subscription" reservation for a recurring trip that meets the following criteria:

- trip is for employment, medical, education, or day care
- trip is taken at least once each week on the same day
- trip is between the same location(s) and at the same time
- trip has been taken consistently over the previous 30-day period
- trip is expected to continue for at least six months

Many subscription trips are provided to sites that close on holidays and trips will be canceled automatically on the following local holidays: Chamorro Heritage Day, Liberation Day, All Soul's Day, and Our Lady of Camarin Day. If your ride is needed on one of these holidays, please call reservations to reschedule.

Subscription reservations must be taken at least 75 percent of the time. That means that cancellations and/or no-shows may not exceed 25 percent. Subscription reservations with excessive cancellations and/or no-shows will not be continued.

## GETTING READY FOR YOUR PICK UP

Pickup and drop off points should be at accessible areas, preferably located curbside adjacent to public streets, roadways or an appropriate off street location. If you require Origin to Destination service, advise the dispatcher where you will be located. Please be ready at the pickup point as our operators cannot leave their bus/vehicles unattended or beyond their view.

Be ready at least 10 minutes ahead of your scheduled pickup time. This is part of your "Pickup Window."

## PICKUP TIME

You can expect the bus to pick you up within ten (10) minutes of your scheduled pickup time, and depart on/or within ten (10) minutes of your scheduled pickup time. This is your "Pick-Up Window."

Operators will leave after waiting at least five (5) minutes beyond the scheduled pickup time, or five (5) minutes after they arrive if they arrive after your scheduled pickup time.

If the bus has not arrived within ten (10) minutes after your scheduled pickup time, call the dispatcher to report the late bus and ask when your bus will arrive. Unexpected delays, such as traffic, road construction, or bad weather can affect your pickup time.

*Example: You request to be picked up at 9:00 a.m. The Dispatcher will tell you that the bus will arrive between 8:50 and 9:10 a.m. That is your "pick-up window." If your bus does not arrive by 9:10 a.m., call the Dispatcher to find out when the bus will be arriving.*

## WHEN YOUR BUS ARRIVES

If your bus arrives early, don't feel rushed or think you have to leave immediately. You are not obligated to leave until your scheduled time, however, if you are ready, you may volunteer to leave early.

When the bus arrives within the ten (10) minute pick-up window, it will wait for five (5) minutes. If the bus arrives beyond the ten (10) minute pick-up window, it is late. Call the Dispatcher to find out when to expect the bus.

Be prepared to show the Operator your ADA Paratransit I.D. card. The Operator may ask to see the card with your identification number on it to be sure (s)he is transporting the correct person or that is your card is valid.

An Operator's responsibility for a customer begins at the origin of the trip and ends at the customer's destination. When inclement weather or other barriers prevent or prohibit access to or beyond the curb, the operator will provide assistance for access to the ride.

An ADA Paratransit rider who is unable to care for oneself, due to a physical or mental disability, shall be met by a responsible individual upon arrival at the destination. If no individual is available, the Operator shall notify dispatch for instructions and shall document the incident. This incident shall be deemed a misconduct and subject to §4.02(g) of GRTA's Rules & Regulations.

## CANCELLATIONS

Trip cancellations are the responsibility of the rider and shall be made at least one (1) hour prior to the scheduled pickup time. If the trip is not canceled at least one (1) hour before the scheduled pickup time, the cardholder will be considered a "No-Show" unless the circumstances are beyond the rider's control.

If you are a "No Show" for your first scheduled pick up, your next rides on the same day will remain on schedule. If you will not be taking any further scheduled rides that day, you need to cancel each one separately. Be a responsible rider and call the Dispatcher to cancel the trips that you do not intend to take.

Riders who have repeated "No Shows" may be subject to suspension of their GRTA Paratransit service.

## NO SHOWS

When a rider schedules a trip and fails to properly cancel the reservation, serious transportation and scheduling problems can result for other riders. All riders desire to be picked up in a timely manner and enjoy a convenient and comfortable trip. It is important that trips are not "wasted."

Don't fail to appear for a scheduled trip. Without properly cancelling your trip, you will be considered a "No Show". A "No Show" occurs when a customer has scheduled ADA paratransit service and the customer has not cancelled the scheduled trip one or more hours before the scheduled pickup time. A pattern of No Shows may result in the temporary loss of your paratransit service.

## FRIENDS & COMPANIONS

- Eligible riders may travel with one companion when you reserve their space. Additional companions may be scheduled only when space is available.
- Companion(s) are subject to the prevailing paratransit fare and must get on and off the bus at the same place and time as the eligible rider.
- Be sure to tell the Scheduler you will be bringing a companion(s) with you when you schedule your ride. Operators will not take companion(s) that are not prescheduled for a trip.

## **USING A LIFT OR RAMP**

Please inform the Dispatcher when booking your trip if you need a lift or ramp. If you are using a wheelchair/scooter, you must sit in the device while boarding or exiting the bus. If you cannot climb stairs, you may stand and use the lift/ramp for entry and exit.

## **BOARDING WITH A MOBILITY DEVICE**

GRTA will transport all mobility devices that fit on the lift or ramp entry.

Recommended measurements fitting accessible entry include, but are not limited to:

- Being no wider than 30 inches.
- Being no longer than 48 inches.
- Weighing no more than 600 pounds when occupied.

If you have a wheelchair/mobility device that exceeds these dimensions and weight, you may not be able to utilize the lifts or ramps. Please contact GRTA's Administration Office for more information at 475-4686 or 475-4616.

Operators will assist you in and out of the bus, on and off the lift or ramp, and secure your mobility device. Buses are equipped with securement tie-downs. For your safety and security, fasten your seat belt and remain seated while riding GRTA Paratransit bus. Riders in wheelchairs/scooters are advised to use their personal lap belt to prevent falling or sliding out of the wheelchair/scooter seat during transport. Undoing your seat belt and/or walking around in the bus while it is in motion is not permitted.

The Operator may offer you a transfer to the bus seat, however, you are not required to do so.

Please keep your mobility device clean and in good condition. For your safety and the safety of others on the bus, the Operator will advise you of parts that may need attention and repair.

If you use:

- A walker, the operator will secure it inside the bus to ensure safety.
- Portable oxygen, it should be carried on your lap and/or be in an approved carrier.

## **PERSONAL CARE ATTENDANT (PCA)**

A Personal Care Attendant (PCA) is someone you may bring with you during your trip to assist with your personal care and/or daily life activities. A PCA does not have to be the same person every time. You must however, be registered with GRTA as needing the services of a PCA with you on your rides.

A PCA is not required to pay a fare when traveling with you on paratransit. Your PCA must get on and off the bus at the same place and time as you. The PCA is not allowed to be transported to any other location.

Please inform the Dispatcher each time you make a reservation that you will be accompanied by a PCA. This ensures there will be room on the bus for both of you.

## CHILDREN

Children less than forty (40) pounds must travel in an adequate child restraint seat. GRTA's Paratransit bus/vehicles are not equipped with child restraint seats, so you will need to bring one with you, otherwise the child cannot ride the bus. Child safety is paramount and Operators will not compromise it.

The Operator will not lift your child onto a seat for you. If you need assistance getting your child seated, please arrange for someone to help you at your pick-up and drop-off locations.

## TRAVEL TIPS

- Carry needed medication with you in case the bus is delayed. If you are diabetic, bring a small snack with you in case your trip is longer than expected.
- Check for carry-on items before arriving at your drop-off location.
- Ensure that you are properly attired to prevent unintended body accidents or exposure to other customers.
- Properly cover all sores, wounds, cuts, abrasions, etc., with clean bandages. Persons with oozing wounds/bandages will not be transported.

## CARRY-ON ITEMS

Items customers may bring on the paratransit vehicle:

- **Animals.** Service animals are permitted on paratransit when under the owner's control, on a leash, or in a container. Other animals that do not cause driver distraction are only permitted on vehicles only when in a secure container.
- **Oxygen.** Personal oxygen tanks may be transported. You may bring a respirator, portable oxygen or other life-support equipment as long as it does not violate hazardous material transportation laws. The equipment must be small enough to fit into the vehicle and be secured. Customers must ensure that there is an adequate oxygen supply (¾ or full) before boarding. Drivers are not authorized to operate life support equipment.
- **Groceries** Due to space limitations, each eligible customer may bring up to four grocery-sized bags provided they can be stored on your lap and under your seat. You may bring groceries on board in a personal two- or four-wheeled collapsible cart. If you are bringing a cart with you, let the reservationist know when you request your ride. Although operators will not assist you with the cart, they can assist you with up to two individual grocery-sized bags if necessary.





- **Other items.** Operators are not permitted to assist with other items. An eligible customer may bring other items on board the vehicle only if the customer, PCA, or companion is able to carry the item to and from the vehicle and the item is small enough to be held on the lap or placed under the seat.

If you are going shopping and anticipate carrying more than will fit in your space, make other arrangements for your trip.

## **PARATRANSIT OPERATORS**

Paratransit Operators are trained in defensive driving, sensitivity awareness, first aid, and the safe operation of the Paratransit vehicles. Please cooperate with the Operator and follow instructions.

## **HOW OPERATORS ASSIST PASSENGERS**

Our operators can help you with

- getting from your door or designated stop location to the paratransit vehicle.
- getting in and out of the vehicle. If you are unable to use the bus steps, you may stand on the bus lift platform to get on and off.
- depositing your fare, if requested.
- fastening seat belts and securing wheelchairs and scooters.
- getting from the paratransit vehicle to the entry door or the designated stop location at your destination.
- If requested, operators will assist customers with manual mobility devices by:
  - pushing and guiding you to/from the vehicle, on/off the lift platform of the vehicle, and inside the vehicle
  - moving you and your device up or down a single step or a curb when it can be done safely

For safety reasons, operators are not permitted

- to engage in conversation with customers while driving. If you have questions during your bus ride, the Operator will gladly respond; however, do not distract the operator with conversation.
- to leave the bus unattended. Do not ask them to pick up mail or packages for you.
- to operate the controls of any powered mobility device, handle a service animal or enter a private residence

For efficiency of shared ride service, operators are not permitted to wait while you “just go in for a minute.” If you need a quick stop, tell the Scheduler when you book your ride and they will schedule another bus for your pick up.

## **VISITOR SERVICE**

ADA Paratransit eligible visitors, who provide GRTA with documentation of their eligibility, are eligible for GRTA’s Paratransit Service. Visitors without documentation, who claim that their disability prevents them from using GRTA’s service, will be considered “presumptively”

eligible for GRTA's Paratransit Service.

Visitors will be provided Complimentary GRTA Paratransit service for a period not to exceed twenty (21) days during any three hundred and sixty-five (365) day period beginning with the visitor's first use of GRTA's Paratransit Service.

Visitors, who request the use of GRTA's Paratransit Service for more than twenty-one (21) days within the three hundred and sixty-five (365) day period from the first day of service, will be asked to submit an application to determine eligibility in the current administrative process.

## RULES FOR RIDING



Keep non-service animals in carrier



No smoking



Keep food and drink in closed containers

All paratransit riders are required to follow these rules:

- Valid and correct fare is required for each trip.
- Smoking is prohibited in all vehicles and facilities.
- Keep food and drink in closed containers.
- Keep animals in a pet carrier (except service animals).
- No disruptive or threatening behavior is allowed.
- Don't be so loud that you disturb others or distract the operator from safe operation of the vehicle.
- Use radios and other audio equipment with headphones only.

Follow ALL policies regarding service. Prohibited acts on Guam's Public Transit System bus or vehicle include but are not limited to the following:

- Consuming food or drink, unless approved as eligible for health reasons
- Littering
- Carrying/possessing any flammable liquid or gas, other than medical oxygen
- Urinating, defecating or spitting
- Using another rider's pass or card
- Solicitation
- Failing or refusing to vacate seats when requested by the Operator, any agent of the transit system, or a police officer and
- Any activity that may endanger the safety and well-being of passengers and the Operator.

Services may be suspended for failure to follow GRTA rules.

## REFUSAL OR SUSPENSION OF SERVICE

GRTA is committed to providing safe and reliable service to all customers, while putting GRTA's resources to best use. The paratransit service does not discriminate on any basis in providing its services to eligible customers. Under ADA regulations, however, GRTA may refuse or suspend service to individuals who engage in violent, seriously disruptive or illegal conduct.

Below is a summary of the conduct that may result in a service refusal or suspension.

### Refusal of service

Operators may refuse service to an individual on a specific occasion at the point of service if the individual's conduct poses an immediate actual or potential risk to safety of the customer, the operator or others.

### Immediate suspension of service

Immediate suspension of service may occur when a customer's conduct

- inflicts serious harm on a customer, GRTA or provider employee, or others,
- results in serious damage to GRTA or contracted provider property,
- creates an immediate actual risk to safety or
- constitutes an illegal activity

### Suspension of service

Service suspensions for a pattern of behavior generally are imposed for a specified length of time, and only after the customer has been previously warned. The suspension will begin on a specific date after the customer has been informed in writing of the pending suspension and the basis for it and has had an opportunity to present information relevant to the pending suspension.

Conduct that may lead to suspension includes but is not limited to the following:

- **No-Show.** A demonstrated pattern of no-shows (late cancellations of unneeded rides, not present or ready to board when the vehicle arrives) is seriously disruptive to paratransit service. Within a 30-day period, **three or more no-shows, OR no-shows which are 10 percent of completed trips (whichever is greater), will be cause for service suspension.** Only no-shows and late cancellations that are within the customer's control will be counted toward the policy. Cancellations made less than 1 hour in advance of the pick-up time, a cancellation at the door, or not being present or ready to leave within five minutes after the vehicle operator comes to the door are all considered no-show. If a customer is a no-show on a ride starting from their home, they must call dispatch to cancel any other scheduled rides no longer needed that day to avoid receiving additional no-shows.
- **Disruption of Service.** A demonstrated pattern of behavior that disrupts service will result in a suspension of service. Disruptive behavior includes, but is not limited to failure to remain seated while a paratransit vehicle is in motion, or refusing to board or disembark the vehicle in a timely manner.
- **Non Payment of Fare.** Failure to present the required fare when boarding a



vehicle is in violation of GRTA's fare policy. A demonstrated pattern of fare non-payment is considered grounds for service suspension.

## **RIGHTS TO REQUEST REVIEW AND APPEAL OF SUSPENSIONS**

Upon receiving notice of suspension, a customer has the opportunity to contest the suspension. The steps for initiating a review or appeal are described in the Grievance and Appeals procedures. A copy will be included with the suspension letter. The document is also available by calling GRTA Administration.

## **LOST AND FOUND**

Articles found left behind on a bus will be turned into the Operations Manager. If you discover you left items on a bus, call the Dispatch office the day of the loss. Articles will be held for forty-five (45) days. Thereafter, all unclaimed items will be given to charity.

If you discover your loss the day after you rode the bus, contact GRTA's Administration Office at 475-4686 and 475-4616.

If you have any suggestions, comments, and inquiries concerning GRTA's Transit services, send us a letter at the address provided on the backcover of this guide, Attention Ombudsperson. All suggestions and commendations are welcome and will be kept CONFIDENTIAL.

## **COMPLAINTS**

### **HOW TO FILE A COMPLAINT**

The complainant shall be given an option of filing an informal or formal complaint, but not both at the same time. This does not however, preclude a customer from the right to file a formal complaint. Complaints may be filed by phone, email or in person. Complaint forms are available online at <http://grta.guam.gov>.

### **INFORMAL COMPLAINT**

Informal complaints shall be processed promptly and discussed for resolution within three (3) days, but not longer than five (5) days from the date and time the complaint is received by GRTA's Ombudsman or alternate.

### **FORMAL COMPLAINT**

Any individual, group of individuals, or entity that believes they have been subjected to discrimination based on race, color, national origin, gender or disability may file a written complaint with GRTA's Executive Manager.

To be accepted, a complaint must meet the following criteria:

- The complaint must be filed within 180 calendar days of the alleged occurrence

- or when the alleged discrimination became known to the complainant.
- The allegation(s) must involve a covered basis such as race, color, national origin, gender, disability, or retaliation.
- The allegation(s) must involve a program or activity of a Federal-aid recipient, sub-recipient, or contractor, or, in the case of ADA allegations, an entity open to the public.

A complaint may be dismissed for the following reasons:

- The complainant requests the withdrawal of the complaint.
- The complainant fails to respond to repeated requests for additional information needed to process the complaint.
- The complainant cannot be located after reasonable attempts.

Once GRTA accepts the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within five (5) calendar days. The complaint will receive a case number and will be logged in GRTA's records identifying its basis and alleged harm, and the race, color, and national origin of the complainant.

In cases where GRTA assumes the investigation of the complaint, GRTA will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days from the date of GRTA's written notification of acceptance of the complaint to furnish a response to the allegations.

In cases where GRTA assumes the investigation of the complaint, GRTA's Investigator shall prepare an investigative report for review by GRTA's Executive Manager within forty (40) calendar days of the acceptance of the complaint. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

Upon issuance of a decision by the Executive Manager, GRTA will notify all parties about the findings and determination.

The Grievance Review and Appeals Board will serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by GRTA. The Review Board will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.

### **TROPICAL CYCLONE CONDITION OF READINESS:**

Upon notification from Guam Homeland Security and the Office of Civil Defense (GHS/OCD) the Governor has placed Guam under Condition of Readiness 2, GRTA will announce through a press release that all bus operations will cease. Riders will be advised to make plans to return home or to a shelter. There will be no bus operations until the Governor has declared the All Clear, and places Guam back to Condition of Readiness 4.

Condition of Readiness:

Condition of Readiness 4 means, damaging winds may arrive within 72 hours.

(Because Guam is always at risk of damaging winds impacting the island within 72 hours, the Island is always in a condition of Readiness 4.)

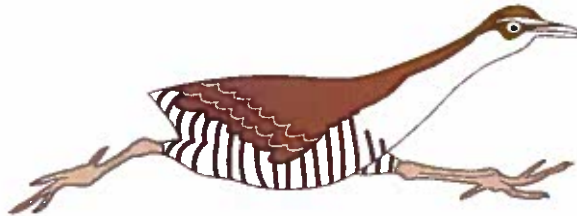
Condition of Readiness 3 means, damaging winds may arrive within 48 hours.

Condition of Readiness 2 means, damaging winds may arrive within 24 hours.

Condition of Readiness 1 means, damaging winds may arrive within 12 hours.



**THANK YOU FOR UTILIZING**



***GRTA***

**GUAM REGIONAL TRANSIT AUTHORITY SERVICES**

*YOUR FREEDOM TO MOBILITY*

**Nihi ta' fan Hanao!**



**Physical Address**

542 N. Marine Corps Drive Tamuning, GU 96913

Phone: 475-4686 or 475-4616

Fax: 475-4600

**Mailing Address**

P.O. Box 2896 Hagåtña, Guam 96932

<http://grta.guam.gov>

**Attachment D**  
**GRTA Application Form for Paratransit Service**



## GUAM REGIONAL TRANSIT AUTHORITY

### GOVERNMENT OF GUAM

Lourdes A. Leon Guerrero, Governor  
Joshua F. Tenorio, Lieutenant Governor  
Celestin C. Babauta, Interim General Manager

P. O. Box 2896  
Hagatna, Guam 96932

Tel: (671) 475-4686 / 475-4616  
Fax: (671) 475-4600



January 09, 2019

Dear Applicant,

***Hafa Adai!*** Thank You for inquiring about the Guam Regional Transit Authority's (GRTA) ADA Paratransit Services. Attached is GRTA's ADA Paratransit Application Form. **Please read all the enclosed material carefully before completing the application form.**

GRTA's ADA Paratransit service is provide to individuals who, because of a **disability** are **prevented** from using the standard Guam Public Transit System Fixed Route Services. This might include being unable to get to or from bus stops, being unable to get on or off buses, or being unable to understand how to ride and use the system.

GRTA will provide paratransit service to person's determined "ADA Paratransit Eligible" for those trips that cannot be made using the Guam Public Transit System. You may, for example, be able to use the Guam Public Transit System for some trips if stops are nearby and there are no barriers which prevent you from getting to and from the bus [at other times, you might be able to get to and use the bus, ADA Paratransit Services is meant to assist you at these times.]

There are two (2) types of ADA Paratransit Eligibility. These are:

- \* **Unconditional** - this eligibility is granted if your disability prevents you from using the Guam Public Transit System for all trips that you might need to make.
- \* **Conditional** - this eligibility is granted if you can use the Guam Public Transit System buses under certain circumstances, but need GRTA's Paratransit Services for certain trips.

To enable us to accurately determine your eligibility for this service, please fill out the enclosed application form as **completely and thoroughly as possible**. The questions are meant to determine the specific limitations you have in using the Guam Public Transit System. They are also meant to determine **when and under what circumstances you can use the Guam Public Transit System buses or when GRTA's Paratransit Service is required**.

After you have completed parts 1 - 6, please have a Guam Licensed Physician complete Part 7 of the application form. The Physician's statement may certify your disability but does not necessarily determine your eligibility for GRTA's Paratransit Service. It is important that all sections of the application form are complete. **If any sections are left blank, the form will be returned to you.**

**Information about your disability which provide in the application will be kept strictly confidential.**

If you need assistance in completing the application form, or have questions about GRTA's ADA Paratransit Services and Eligibility, please feel free to contact our office at:

671-475-4686 /475-4616 (Office)  
671-300-7262 (Voice)  
671-475-4600 (Facsimile)

Material is also available in large print and can be provided in another format if needed. Please call our office and inform our staff of the format you require.

Completed applications will be processed within twenty-one (21) calendar days of receipt. You will be notified in writing of your eligibility for GRTA's ADA Paratransit Services. If you have not heard from us in twenty-one (21) days, please call our office and we will provide you with paratransit services until your application is processed. Please note that in some instances, we may not be able to determine your eligibility without further information. In this case, we may ask you to schedule an In-Person Assessment to allow us to better understand your disability and transportation needs.

If you are determined to be eligible for GRTA's ADA Paratransit Services (either Unconditional or Conditional), a "Paratransit Rider's Guide", which provides information about the services and how to use it will be provided to you during the In Person Assessment or will be sent to you at the address you provided in the application. GRTA staff will take your picture for your Paratransit Riders Identification Card here in our office.

If it is determined that you are able to use the Guam Public Transit System and therefore are not eligible for GRTA's Paratransit Services, we will notify you in writing of the exact reasons for this determination.

Sincerely,

/S/

CELESTIN C. BABAUTA  
Interim General Manager

Attachments



## PART 1. GENERAL INFORMATION

### FOR OFFICIAL USE ONLY

Type: ☐ New ☐ Renewal ☐ Recertification

ID No: \_\_\_\_\_

Date Issued: \_\_\_\_\_

Date of Expiration: \_\_\_\_\_

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

Mailing Address: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Home Address: \_\_\_\_\_ Village: \_\_\_\_\_

Telephone No: (Home): \_\_\_\_\_ (Cell/Work): \_\_\_\_\_

Date of Birth: \_\_\_\_\_ Weight: \_\_\_\_\_ Height: \_\_\_\_\_

Hair Color: \_\_\_\_\_ Eye Color: \_\_\_\_\_

If someone assisted you in completing this form, please identify them below:

Name: \_\_\_\_\_ Phone No: \_\_\_\_\_

Do you need to have information and material given to you in any of the following ways (check all that you need):

☐ Large Print ☐ Audio Tape ☐ Braille ☐ Other

Please give us the name and telephone number of someone we can call in an emergency.

Name: \_\_\_\_\_ Phone No: \_\_\_\_\_

Relationship: \_\_\_\_\_

## PART 2. APPLICATION CERTIFICATION

Please indicate below the reason(s) why you are seeking ADA Paratransit Eligibility (check all that apply):

- ☐ I can use the Guam Public Transit System (Fixed Route) to go some places, but in other places I cannot get to or from the bus stop.
- ☐ I can use the Guam Public Transit System (Fixed Route) sometimes, but only if buses are equipped with wheelchair lifts
- ☐ Because of my disability, I can never use the Guam Public Transit System.

I understand that the purpose of this evaluation form is to determine if there are times when I cannot use the Guam Public Transit System provided by the Guam Regional Transit Authority (GRTA) and must therefore use GRTA's Paratransit Service. I understand that the information about my disability contained in this application will be kept confidential and shared only with professionals involved in evaluating my eligibility to use the GRTA's Paratransit Service. I certify that, to the best of my knowledge, the information in this evaluation form is true and correct. I understand that providing false or misleading information could result in my eligibility status being re-examined as well as other actions deemed necessary by the Guam Regional Transit Authority (GRTA).

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

## PART 3. INFORMATION ABOUT THE APPLICANT'S DISABILITY

1. What type or types of disabilities prevent you from using the Guam Public Transit System (Fixed Route) (check all that apply):

- |   |   |
|---|---|
| <input type="checkbox"/> Physical Disability      | <input type="checkbox"/> Visual Impairments/Blindness |
| <input type="checkbox"/> Developmental Disability | <input type="checkbox"/> Mental Illness               |
| <input type="checkbox"/> Other                    | <input type="checkbox"/> None                         |

Please describe your disability in detail: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



2. Is the disability described above temporary or permanent?

- ☐ Temporary, I expect it to last for another \_\_\_\_\_ months
- ☐ Permanent
- ☐ Controlled with medication
- ☐ I don't know

3. Please indicate below if you use any of the following mobility aids or equipment.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Cane  | <input type="checkbox"/> Long White Cane      | <input type="checkbox"/> Picture Board      |
| <input type="checkbox"/> Crutches                                      | <input type="checkbox"/> Walker               | <input type="checkbox"/> Powered Wheelchair |
| <input type="checkbox"/> Alphabet Board                                | <input type="checkbox"/> Manual Wheelchair    | <input type="checkbox"/> Prosthesis         |
| <input type="checkbox"/> Powered Scooter                               | <input type="checkbox"/> Leg Braces           |   |
| <input type="checkbox"/> Other _____                                   | <input type="checkbox"/> Service Animal _____ |   |
| <input type="checkbox"/> DO NOT USE any of the above aids or equipment |   |   |

**NOTE: GRTA may not be able to accommodate you if your wheelchair/scooter is longer than 48" or wider than 32" or if your total weight with your wheelchair is more than 600 pounds.**

4. Do you require assistance of a Personal Care Attendant (PCA) (someone who will assists you with daily life functions when you travel)?

- ☐ Yes                      ☐ Always                      ☐ Sometimes

Name of Personal Care Attendant: \_\_\_\_\_

(Print)

If a PCA is required, assistance is needed with the following (check all that apply):

- |                                      |   |                                 |                                    |                                     |
|--------------------------------------|---|---------------------------------|------------------------------------|-------------------------------------|
| <input type="checkbox"/> Mobility    | <input type="checkbox"/> Reading                | <input type="checkbox"/> Eating | <input type="checkbox"/> Transfers | <input type="checkbox"/> Medication |
| <input type="checkbox"/> Other _____ | <input type="checkbox"/> DO NOT NEED ASSISTANCE |                                 |                                    |                                     |

## PART 4. QUESTIONS ABOUT USING THE GUAM PUBLIC TRANSIT SYSTEM

5. Have you ever used the Guam Public Transit System?

☐ Yes, I typically use the Guam Public Transit System \_\_\_\_\_ a week

☐ Yes, I used to but stopped because \_\_\_\_\_

☐ No

6. Is there something that might help you ride the buses (check all that apply)?

☐ Yes, Route and schedule information

☐ Yes, learning to use the buses

☐ Yes, being able to get buses with lifts

☐ Yes, a communication aide

☐ Yes, if stops were closer to where I live and where I need to go

☐ Yes, (describe) \_\_\_\_\_

☐ No

7. Can you ask for and follow written or oral instructions to use the Guam Public Transit System?

☐ Yes

☐ No

☐ Sometimes

☐ I don't know, never tried to use the buses

If No or Sometimes, please check all that apply:

☐ I get too confused and might get lost

☐ Other people cannot understand me

☐ I probably could with instruction

☐ Other \_\_\_\_\_

8. Are you able to GET TO and FROM bus stops on your own?

☐ Yes

☐ No

☐ Sometimes

☐ I don't know, never tried to use the buses

If No or Sometimes, please check all that apply:

☐ I can't get places if there are no curb-cuts

☐ I can't of streets or sidewalk is too steep

☐ I can't cross busy streets & intersections

☐ I can't travel outside when it is too hot

☐ I can't find my way at night because of a vision problem

☐ I get confused and can't find my way

☐ I probably could with instruction

☐ I feel unsafe traveling alone

☐ Other \_\_\_\_\_

9. Under the best of conditions, how far can you walk outdoors (or travel using a mobility aide) without the help of another person?

- ☐ I can get to the curb in front of my house/apartment
- ☐ I can travel up to three (3) blocks (1/4 mile)
- ☐ I can travel up to six (6) blocks (1/2 mile)
- ☐ I can travel up to nine (9) blocks (3/4 mile)
- ☐ I am unable to travel outside my house/apartment

10. Can you wait up to thirty (30) minutes for a Guam Public Transit System Bus?

- ☐ Yes
- ☐ Yes but only if the stop has a bench and shelter
- ☐ Yes but I do not like to wait long
- ☐ No (explain): \_\_\_\_\_

11. Can you Get On and Off a Guam Public Transit System Bus?

- ☐ Yes
- ☐ No
- ☐ Sometimes
- ☐ I don't know, never tried to use the buses

If No or Sometimes, please check all that apply:

- ☐ Only if the bus has a wheelchair lift
- ☐ I can't climb stairs
- ☐ I don't want to use the lift
- ☐ I probably could with instruction
- ☐ Other \_\_\_\_\_

12. If you are able to get on and off the Guam Public Transit System Bus, can you get to a set or wheelchair position by yourself and ride the bus?

- ☐ Yes
- ☐ No
- ☐ Sometimes
- ☐ I don't know, never tried to use the buses

If No or Sometimes, please check all that apply:

- ☐ I need someone to help me
- ☐ I have a balance problem
- ☐ I have trouble finding a seat
- ☐ I need the seat nearest the door
- ☐ Other \_\_\_\_\_

13. If you are able to get on and off the Guam Public Transit System Buses, do you know where to get off the bus or can you find out by yourself?

- ☐ Yes
- ☐ No
- ☐ Sometimes
- ☐ I don't know, never tried to use the buses

If No or Sometimes, please check all that apply:

- ☐ I get confused and can't remember where I am going
- ☐ I can if the driver calls out the stops
- ☐ I probably could with training
- ☐ Other \_\_\_\_\_

14. Are there any other conditions which limit your ability to use the Guam Public Transit System Buses?

- ☐ Yes, please describe: \_\_\_\_\_  
\_\_\_\_\_
- ☐ No

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## PART 5. CURRENT TRAVEL INFORMATION

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15. Please give us information about where you go and how you get there now. List three (3) places you go most often.

1. Where do you go? \_\_\_\_\_  
Address: \_\_\_\_\_  
How often do you go there? \_\_\_\_\_  
How do you get there? \_\_\_\_\_
2. Where do you go? \_\_\_\_\_  
Address: \_\_\_\_\_  
How often do you go there? \_\_\_\_\_  
How do you get there? \_\_\_\_\_
3. Where do you go? \_\_\_\_\_  
Address: \_\_\_\_\_  
How often do you go there? \_\_\_\_\_  
How do you get there? \_\_\_\_\_

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## PART 6. INFORMATION ABOUT TRAVEL TRAINING (Survey-Data Collection Purpose Only)

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**NOTE: Travel training is personal (one-to-one) instruction that teaches an individual how to use the Guam Public Transit System Buses.**

16. Have you ever had any personal instruction on riding the Guam Public Transit System?

- ☐ No, I have not received any personal instruction
- ☐ Yes, I received personal instruction from \_\_\_\_\_  
If so, indicate below all of the skills you learned.
- ☐ To travel to and from the bus stop
  - ☐ To cross streets
  - ☐ To ride on the following routes (list them)  
Route: \_\_\_\_\_ Route: \_\_\_\_\_
  - ☐ Reading bus schedules and planning trips
  - ☐ Other \_\_\_\_\_

Did you complete the above described instructions?

☐ Yes ☐ No

17. Please draw a map to your residence. A Transit Inspector will be by to address your area for bus access. (Note: Buses are NOT allowed to enter non-paved roads and single narrow access roadways.)

Name: \_\_\_\_\_

Phone No: \_\_\_\_\_

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

This ends the portion of the application to be completed by the Applicant. The last section (on the attached pages) MUST BE completed by a Guam Licensed Physician.

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## **PART 7. MEDICAL CERTIFICATION (To be completed by a Licensed Physician)**

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The American with Disabilities Act (ADA) of 1990 requires the Guam Regional Transit Authority (GRTA) to provide "ADA Paratransit Services" to anyone with a disability who cannot use the standard Guam Public Transit System Fixed Route Services and who is traveling within a 3/4 mile area served by Fixed Route Services. The applicant who requests you to review and sign this form is applying at GRTA to be considered eligible for this service. GRTA's ADA Paratransit Service is intended only for those trips on the Guam Public Transit System that the person cannot access.

This application form is intended to determine when and under what circumstances the applicant can use GRTA's Guam Public Transit System - Paratransit Services.

Please carefully review all the information provided by the applicant in Parts 2-4 of this form and then complete the appropriate "Attachment" below:

(a) Please complete all the appropriate assessment forms that best describes the physical and/or cognitive conditions which functionally prevents the applicant from using the standard Guam Public Transit Fixed Route Services System.

Attachment A: Applicant with Cognitive Disabilities

Attachment B: Applicant with Psychiatric Disabilities

Attachment C: Applicant with Vision Disabilities

Attachment D: Applicant with Seizure Disorders

Attachment E: Applicant with Physical Disabilities

(b) To the best of your knowledge, the information provided by the applicant in Parts 2-4 of this application is true and correct?

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**ATTACHMENT A**  
**Applicant with Cognitive Disabilities**

**Name of Applicant:** \_\_\_\_\_

**Name of Licensed Physician:** \_\_\_\_\_

**Date Completed:** \_\_\_\_\_

1. In what capacity do you know the applicant?

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

2. How long have you known or worked with the applicant?

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

3. When did you last see the applicant?

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

4. Comments about the applicant's stated ability and level of cognitive ability?

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

5. Does the applicant have specific behavioral problems?

☐ Yes

☐ No

If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_

6. Does the applicant travel alone at times?

☐ Yes

☐ No

If so, where: \_\_\_\_\_  
\_\_\_\_\_

7. What abilities does the applicant have to follow directions to make a trip?

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8. What abilities does the applicant have to understand time and follow a schedule to get to places on time?

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9. What abilities does the applicant know when he/she is lost?

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10. What abilities does the applicant have to get help if he/she is lost?

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11. What ability does the applicant have to cross a street safely?

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12. Comments about the applicant stated ability to travel alone.

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13. Comments about skills related to functional abilities to travel: Orientation to person, place and time

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14. Comments on applicant judgement and safety skills related to traveling alone.

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15. Comments on problem solving and insight skills.

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16. Comments on short-term and long-term memory.

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17. Comments on concentration (focus attention).

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18. Comments on ability to seek and act on direction.

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19. Comments on ability to process information.

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20. Comments on consistency (the ability to maintain a particular standard or repeat a particular task with minimal variation).

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21. Comments on ability to communicate needs.

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22. Comments on behavioral skills

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23. Comments about applicants related physical skills that may affect travel (i.e. walking stability - gait, balance; physical stamina-endurance, or seizures)

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**PLACE LICENSE PHYSICIAN OFFICAL STAMP BELOW**

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name & Title: \_\_\_\_\_

Current Guam Medical License No. \_\_\_\_\_

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

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

Telephone No: \_\_\_\_\_ Fax No. \_\_\_\_\_

**ATTACHMENT B**  
**Applicant with Psychiatric Disabilities**

**Name of Applicant:** \_\_\_\_\_

**Name of Licensed Physician:** \_\_\_\_\_

**Date Completed:** \_\_\_\_\_

**1. In what capacity do you know the applicant?**

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**2. How long have you known or worked with the applicant?**

---

---

**3. When did you last see the applicant?**

---

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**4. What is the formal diagnosis of the applicants disability (DSM-IV or other)?**

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**5. What was the date of onset?**

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**6. What is the prognosis?**

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7. Is the applicant taking any psychotropic, antidepressant or other medication(s) prescribed by you?

☐ Yes ☐ No

8. If Yes, please list the type, frequency, dose and any comments about how the medication(s) may complicate the individual's independent mobility in the community?

Medication Type	Dosage	Effect on Functional Ability (if any)

9. If the applicant takes his/her medication compliantly, will he/she be able to travel independently in the community?

☐ Yes ☐ No

Comments:

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10. Do you deem the applicant to be compliant in taking prescribed medication?

☐ Yes ☐ No

Comments:

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---

11. Is there anything about the use of medication that would complicate the applicant's use of public transportation?

☐ Yes ☐ No

Comments:

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---

12. Has the applicant's functional ability decreased temporarily due to adjustment to medication?

☐ Yes ☐ No

13. If Yes, please explain and note the expected duration of the decrease in functional ability.

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14. Does the applicant currently experience either auditory or visual hallucinations?

☐ Yes

☐ No

15. If Yes, would he/she likely to experience auditory or visual misperceptions due to hallucinations?

☐ Yes

☐ No

Comments:

16. Are any of the following skills affected by the applicant's disability? If Yes, please explain, describing the effect and the extent of limitation caused by the disability. Is the applicant able to:

	Yes	No	Sometimes	Comments
Travel alone outside the house				
Leave the house on time				
Seek and act on directions				
Find way to/from bus stop				
Cross Streets				
Wait for a bus				
Board the correct bus				
Ride on the bus				
Exit at the correct destination				
Transfer to a second bus				
Monitor time				
Deal with unexpected situations				

Comments:

17. Are any of the following affected by his/her disability? If Yes, please explain:

	Yes	No	Sometimes	Comments
Judgement				
Problem Solving				
Insight (recognizing a problem)				
Coping skills				
Short-term memory				
Long-term memory				
Concentration				
Orientation				
Communication				
Attention to task (distractability)				

Comments:

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18. Would training, driver assistance or tools such as ID cards, printed route directions, etc., help to minimize the effects noted above?

☐ Yes ☐ No

Comments:

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19. Is the goal of traveling independently (even limited travel in the neighborhood) within the context of treatment?

☐ Yes ☐ No

Comments:

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20. Would the use of alternative transportation (ADA Paratransit Services) conflict with the goals of therapy, such as confidence building?

☐ Yes ☐ No

Comments:

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21. Would alternative transportation (ADA Paratransit Services) interfere with the applicant's therapy or involvement?

☐ Yes ☐ No

Comments:

22. Does the applicant demonstrate inappropriate social behavior (for example, is he/she aggressive or over friendly? If Yes, please explain.

☐ Yes ☐ No

Comments:

23. Comments regarding current travel and activities:

Comments:

23. Does the individual drive a car?

☐ Yes ☐ No

Comments:

25. Are there any other life skills that the individual lacks that would be an indication of his/her inability to travel on a Fixed Route Bus? If Yes, please describe.

☐ Yes ☐ No

Comments:

26. Is there any additional information regarding this individual that you believe affects his/her functional ability to use regular Fixed Route Bus Service, or any special circumstances that you believe should be considered?

Comments:

**PLACE LICENSE PHYSICIAN OFFICAL STAMP BELOW**

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name & Title: \_\_\_\_\_

Current Guam Medical License No. \_\_\_\_\_

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

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

Telephone No: \_\_\_\_\_ Fax No. \_\_\_\_\_



**ATTACHMENT C**  
**Applicant with Vision Disabilities**

**Name of Applicant:** \_\_\_\_\_

**Name of Licensed Physician:** \_\_\_\_\_

**Date Completed:** \_\_\_\_\_

**1. In what capacity do you know the applicant?**

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**2. How long have you known or worked with the applicant?**

---

---

**3. When did you last see the applicant?**

---

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**4. What is the formal diagnosis of the applicants eye disease or condition?**

Please include a visual acuity statemet which indicates

- a. The visual acuity for each eye
- b. The field vision for each eye
- c. The visual acuity with best correction for each eye

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**5. What was the date of onset?**

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**6. What is the prognosis? Is the condition stable, degenerative, or otherwise changing?**

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7. Is the applicant able to walk outdoors alone?

☐ Sometimes

☐ Often

☐ Never

8. If Sometimes or Often, where can he/she travel?

Only on his/her own property

☐ Yes

☐ No

To places nearby (for example, on the same block)

☐ Yes

☐ No

To places farther away

☐ Yes

☐ No

If Yes to places farther away, please explain:

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9. If the applicant is able to travel outdoors alone, is he/she able to cross streets without help?

At quiet street with very little traffic

☐ Yes

☐ No

At traffic lights

☐ Yes

☐ No

At very busy intersections

☐ Yes

☐ No

Comments:

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If the applicant is partially sighted:

10. Is he/she able to see steps or curbs?

☐ Sometimes

☐ Often

☐ Never

☐ N/A

Comments:

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11. Is his/her vision affected by different lighting conditions?

Bright sunlight

☐ Yes

☐ No

Dimly lit or shaded places

☐ Yes

☐ No

Night time

☐ Yes

☐ No

Comments:

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12. Is the applicants ability to travel outside alone affected by other conditions (consider in particular the impact of environment noise or the inability to distinguish traffic flow patterns)? If so, please describe.

Comments:

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**PLACE LICENSE PHYSICIAN OFFICAL STAMP BELOW**

Signature:

---

Date:

---

Print Name & Title:

---

Current Guam Medical License No.

---

Business Address:

---

---

Mailing Address:

---

---

Telephone No:

---

Fax No.

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**ATTACHMENT D**  
**Applicant with Seizure Disorders**

**Name of Applicant:** \_\_\_\_\_

**Name of Licensed Physician:** \_\_\_\_\_

**Date Completed:** \_\_\_\_\_

1. In what capacity do you know the applicant?

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

2. How long have you known or worked with the applicant?

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

3. When did you last see the applicant?

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

4. Please describe what the applicant experiences during and after a seizure.

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

5. How often do seizures occur?

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

6. What is the prognosis?

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

7. Are the seizures preceded by an aura?

☐ Yes

☐ No

☐ Sometimes

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

8. If Yes or Sometimes, does the applicant usually have time to prepare and make himself/herself as safe as possible?

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9. Are there certain things that will trigger the applicant's seizures?

☐ Yes ☐ No

Comments: 

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10. If Yes, please describe these triggers.

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11. Please describe the applicant's ability to travel alone in the community. When and where can he/she safely travel?

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12. What advise or limitation on traveling alone in the community have been communicated to the applicant?

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13. Is the applicant permitted to drive?

☐ Yes ☐ No

Comments: 

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14. Is the applicant taking any medication(s) prescribed by you or another professional?

☐ Yes ☐ No

Comments: 

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15. If Yes, please list the type, frequency, dose and any comments about how the medication(s) may complicate the individual's independent mobility in the community?

Medication Type	Dosage	Effect on Functional Ability (if any)

16. If the applicant takes his/her medication compliantly, will he/she be able to travel independently in the community?

☐ Yes                      ☐ No

Comments: \_\_\_\_\_

17. Do you deem the applicant to be compliant in taking prescribed medication?

☐ Yes                      ☐ No

Comments: \_\_\_\_\_

18. Is there anything about the use of medication that would complicate the individual's use of public transportation?

☐ Yes                      ☐ No

If Yes, please explain: \_\_\_\_\_

19. Has the applicant functional ability decreased temporarily due to adjustment to medication?

☐ Yes                      ☐ No

20. If Yes, please explain and note the expected duration of the decrease in functional ability.

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

21. Comments about the applicant's typical activities and current travel destinations.

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

**PLACE LICENSE PHYSICIAN OFFICAL STAMP BELOW**

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name & Title: \_\_\_\_\_

Current Guam Medical License No. \_\_\_\_\_

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

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

Telephone No: \_\_\_\_\_ Fax No. \_\_\_\_\_

**ATTACHMENT E**  
**Applicant with Physical Disabilities**

**Name of Applicant:** \_\_\_\_\_

**Name of Licensed Physician:** \_\_\_\_\_

**Date Completed:** \_\_\_\_\_

**1. In what capacity do you know the applicant?**

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**2. How long have you known or worked with the applicant?**

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---

**3. When did you last see the applicant?**

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**4. What is the formal diagnosis of the applicant's disability?**

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**5. What is the date of onset?**

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**6. What is the prognosis?**

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7. How does the applicant's disability / health condition affect daily life activities?


8. Please define reasonable expectations for each skill (reasonable walking distances, reasonable terrain that can be negotiated, reasonable time that applicant could stand and wait for bus, etc.)

Required Travel Skills	Reasonable Expectations
Walking distance to/from stops	
Stepping on/off curbs and crossing streets	
Negotiating hills/steep terrain	
Standing time at bus stop	
Boarding lift and non-lift buses	
Other	

9. Please define in more detail any environmental issues that may apply (temperature sensitivities - what temperatures would present unsafe or risky conditions for the applicant).

Environmental Issues	Unsafe/Risky Condition(s)
Extreme Heat/Humidity	
Extreme Cold	
Poor Air Quality	
Other	

10. Please list the type, frequency, dose and any comments about how the medications(s) may complicate the individual's independent mobility (travel) in the community.

Medication Type	Dosage	Effect on Functional Ability (if any)

**PLACE LICENSE PHYSICIAN OFFICAL STAMP BELOW**

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

**Print Name & Title:** \_\_\_\_\_

**Current Guam Medical License No.** \_\_\_\_\_

**Business Address:** \_\_\_\_\_  
\_\_\_\_\_

**Mailing Address:** \_\_\_\_\_  
\_\_\_\_\_

**Telephone No:** \_\_\_\_\_ **Fax No.** \_\_\_\_\_



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

Headquarters

East Building, 5th Floor, TCR  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

February 1, 2021

Celestin C. Babauta  
Interim Executive Manager  
Guam Regional Transit Authority  
P.O. Box 2896  
Hagatna, Guam 96932

RE: ADA Complementary Paratransit Specialized Review Final Report

Dear Mr. Babauta:

This letter concerns the Federal Transit Administration's (FTA) ADA Complementary Paratransit Specialized Review of the Guam Regional Transit Authority (GRTA), conducted March 3–6, 2020. Enclosed is a copy of the Final Report, which will be posted on FTA's website on our ADA page.

The FTA Office of Civil Rights is responsible for ensuring that providers of public transportation comply with the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, and the U.S. Department of Transportation's (DOT) implementing regulations at 49 CFR Parts 27, 37, 38, and 39. As part of our ongoing oversight efforts, FTA conducts a number of onsite reviews to ensure compliance with the ADA and the applicable departmental regulations. FTA uses the findings from these reviews to provide direction and technical assistance to transit agencies in order to achieve compliance with the ADA.

Unless otherwise noted, all corrective actions identified in the Final Report must be undertaken within 60 days of the date of this letter. Once we have reviewed your submissions, we will either request clarification or additional corrective action, or will close out the finding if your response sufficiently addresses the ADA requirements. Please email your responses to John Day at [john.day@dot.gov](mailto:john.day@dot.gov).

We appreciate the cooperation and assistance that you and your staff have provided us during this review, and we are confident GRTA will take steps to correct the deficiencies. If you have any questions about this matter, please contact John Day at (202) 366-1671, or via email at [john.day@dot.gov](mailto:john.day@dot.gov).

Sincerely,

John Day  
Program Manager  
FTA Office of Civil Rights

Enclosure

cc: Ray Tellis, Regional Administrator, FTA Region 9  
Selene Faer Dalton-Kumins, Associate Administrator, FTA Office of Civil Rights