

FTA

FEDERAL TRANSIT ADMINISTRATION

Gwinnett County Transit
ADA Paratransit Compliance Review
Final Report
March 2021



U.S. Department of Transportation
Federal Transit Administration

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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 Gwinnett County Transit (GCT) in Gwinnett County, GA. The review's objective is to verify whether GCT 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 GCT paratransit riders and local disability organizations
2. Site visit: a three-person review team's observations of GCT's paratransit trip requests, including scheduling and dispatching, examination of eligibility applications and related documents (including appeals), and interviews with GCT employees and contractors
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

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

Positive Program Elements

- Effective working relationship between GCT and Transdev, the paratransit service contractor
- Based on an analysis of a sample of completed trips, GCT's on-time pickup performance (early and in window) is over 94 percent. Less than 2.4 percent of pickups are more than 15 minutes late
- Based on an analysis of a sample of requested paratransit trips, GCT has no denials and few missed trips

GCT 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

- GCT's paratransit eligibility application contains inappropriate questions for applicants and health care professionals
- Eligibility determination letters sent to individuals require several revisions for accuracy
- GCT has not designated an individual or job position to coordinate the process of handling complaints

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

Substantive Deficiencies

- Paratransit service starts slightly later than fixed route service on weekdays and ends slightly earlier than fixed route service on Saturdays
- GCT does not provide service to individuals whose eligibility determinations are not made within 21 days
- GCT does not provide service to visitors who do not have credentials from another paratransit system

Please see Section 6 for a discussion of all 23 deficiencies. The Summary Table of Compliance Review Findings (following Section 6) lists all findings. Unless otherwise stated, GCT 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 GCT. Information on GCT, the review team, and the dates of the review are presented below.

Grant Recipient:	Gwinnett County Board of Commissioners
City/State:	Lawrenceville, GA
Recipient Number:	5440
Executive Official:	Charlotte Nash, Chairman, Gwinnett County Board of Commissioners
On-site Liaison:	Karen Winger, Division Director, Transit; Gwinnett County Department of Transportation
Report Prepared By:	the Collaborative, Inc.
Dates of On-Site Visit:	February 4-7, 2020
Review Team Members:	Patti Monahan, the Collaborative, Inc. David Chia, the Collaborative, Inc. Amy Bledsoe, 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 GCT’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 GCT’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 Gwinnett County Transit

Gwinnett County Transit (GCT) operates fixed route local and commuter bus and ADA complementary paratransit service in Gwinnett County, GA. GCT is a division within the county Department of Transportation. GCT's administrative office is located at the Gwinnett County Justice & Administrative Center, 75 Langley Drive, Lawrenceville, GA.

GCT contracts with Transdev for all operations and administration of both the fixed route and ADA paratransit services.

GCT's operating budget for fiscal year (FY) 2019 was \$1.48 million. The operating budget in FY 2018 was \$1.5 million. Sources of operating funds include federal grants, county general fund revenues from property taxes, fare revenues, and a small amount of advertising revenue.

GCT's fixed route service consists of five commuter bus routes and seven local bus routes. Service operates Monday through Saturday. Base fare for bus service is \$2.50. In FY 2019, GCT's fixed route ridership was 1,501,267 (FTA National Transit Database).



For more information on GCT, go to www.gctransit.com.

4.1 Introduction to Paratransit Services

GCT provides ADA complementary paratransit service through its “Gwinnett County Paratransit” service.

As presented in Table 4.1, in FY 2019, there were 49,301 ADA paratransit riders (including personal care attendants and companions). In terms of weekly ridership, this is approximately 948 trips. This was a 23.6 percent increase in ridership from the prior fiscal year.

Table 4.1 – Gwinnett County Transit ADA Paratransit Ridership

Fiscal Year	Total Passengers¹	Weekly Passengers	Annual Ridership Change
2019	49,301	948	23.6%
2018	39,837	766	71.4%
2017	23,241	447	-15.3%
2016	27,450	528	—

¹Passengers include personal care attendants, companions

As noted above, Gwinnett County contracts with Transdev for operation and maintenance of the GCT fixed route and paratransit services. Scheduling, dispatching, supervision, driver check-in, and vehicle maintenance take place at the Transdev facility, 2880 Remington Park Court, Norcross, GA. At the time of the site visit, trip requests were also taken at that location; however, a move of the call-taking function to the county's customer service center in Duluth, GA, was imminent. In addition, Transdev operates express commuter service for the Georgia Regional Transportation Authority (GRTA) from the Norcross facility. GRTA and GCT shared one procurement to obtain Transdev services but contract with Transdev separately.

The GCT paratransit fleet consists of seven active body-on-chassis vehicles. All vehicles are equipped with a lift with capacity of 800 pounds. All vehicles are model year 2017. Mileages range from roughly 93,000 to 110,000. GCT owns the vehicles used in paratransit service (an additional two vehicles were leased for use in a microtransit pilot operated by Transdev for GCT between September 2018 and April 2019). Vehicle maintenance takes place at 2880 Remington Park Court. Transdev maintenance technicians perform vehicle maintenance.

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 GCT's complementary paratransit service ("Gwinnett County Paratransit") 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 GCT's service area, response time, fares, and hours and days of service, as well as GCT'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 appeal 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 Gwinnett County Department of Transportation's Transit Division Director Karen Winger on November 7, 2019, requesting her to send information to the review team before the site visit (Attachment A).

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

- GCT's description of how its complementary paratransit service is structured
- Public information describing GCT's ADA complementary paratransit service
- GCT'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 "Enclosure 1: Pre-Site Visit"

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

- Eligibility determination files
- Records of consumer comments and complaints and a summary of complaints from the past five years
- GCT's fleet roster
- A listing of paratransit employees and their start dates
- Capital and operating budgets and cost data

The on-site review of GCT ADA complementary paratransit service took place from February 4-7, 2020. The visit began with an opening conference, held at 9 a.m. on Tuesday, February 4 at the facility from which Transdev operates GCT fixed route and paratransit service, located at 2880 Remington Park Court, Norcross, GA. The following people attended the meeting:

- Kirk Gagnard, Transit Manager, GCT¹
- Syril Melvin, Operations and Maintenance Coordinator, GCT
- Loammi Aviles, Operations, GCT
- Natasha Tyler, General Manager, Transdev
- Tazmisha Jones, Manager, Software Applications, Transdev
- Debra Moses, Customer Service Manager, Transdev
- John Day (by phone), Program Manager for Policy and Technical Assistance, FTA
- Dee Foster (by phone), Regional Civil Rights Officer, FTA Region 4
- Patti Monahan, Review Team Leader
- David Chia, Review Team Member
- Amy Bledsoe, Review Team Member

Prior to and following the opening conference, the review team met with a number of GCT and Transdev managers who have a role in providing GCT paratransit service. Team members gathered information about the relationship between Gwinnett County and Transdev staff members and the roles and responsibilities of the individuals involved in the provision and oversight of GCT paratransit service. The Gwinnett County team shared impending plans to move the GCT paratransit reservations and scheduling staff to the county's Customer Service center in another facility. Staff also provided an overview of the GCT processes for handling complaints, making eligibility determinations, and managing the operation's telephone system. The group determined the best schedule for the review team to observe the reservations and dispatch functions, speak to the Transdev safety manager about training, and interview drivers, and selected a two-week period from which to sample operating data for evaluation. One team member began to review complaint records.

In the afternoon, team members evaluated data availability, began to analyze compliance with service criteria, and observed reservation call-takers and dispatch.

On Wednesday, February 5, team members toured the GCT operations and maintenance facility and continued to observe reservation call-takers. One team member spoke by phone with the

¹ Karen Winger, Transit Division Manager, GCT, was unable to participate in the opening conference.

contractor who conducts the GCT paratransit eligibility determination process. The Transdev paratransit manager, who works with the contractor on the eligibility determination process, and the Gwinnett County transit manager also participated in the call. The process, eligibility outcomes, and documentation were discussed. The review team member also began to review a set of applicant files to assess determinations and verify the documentation maintained by GCT, and followed up on a number of eligibility issues with the Transdev general manager. She then discussed GCT budget and resources with the transit manager. Team members interviewed six GCT paratransit drivers. One team member continued to analyze sample trip data to generate results on on-time performance.

On Thursday, February 6, team members continued to analyze data and review eligibility files. One team member met with the Transdev safety manager to discuss training topics and schedules. Another reviewed nondiscrimination policies. Team members continued analysis of sample trip data for on-time performance and trip length comparison to fixed route service.

On Friday, February 7, 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, including following up with the transit division director on a number of issues. The exit conference took place at 2 p.m. at the Gwinnett County Department of Transportation offices in the Gwinnett Justice and Administrative Center. Attending the conference were:

- Karen Winger, Transit Division Manager, GCT
- Kirk Gagnard, Transit Manager, GCT
- Loammi Aviles, Operations, GCT
- Natasha Tyler, General Manager, Transdev
- John Day (by phone), Program Manager for Policy and Technical Assistance, FTA
- Patti Monahan, Review Team Leader
- David Chia, Review Team Member
- Amy Bledsoe, Review Team Member

GCT was provided with a draft copy of the report for review and response. A copy of the correspondence received from GCT on [date of receipt], documenting their response to the draft report, is included as Attachment B.[to be included in Final Report]

5.3 Stakeholder Interviews

Before the site visit, the review team interviewed five complementary paratransit riders and four representatives of agencies that work with paratransit riders. The following is a summary of comments received:

Eligibility. The riders interviewed had no concerns with the eligibility process. Three out of four of the agency representatives said that it took longer than 21 days to be notified of riders' eligibility. One individual mentioned that it took closer to 30 days.

Telephone access. None of the riders interviewed had trouble getting through to a call-taker. One agency professional mentioned that it can take two or three times before the phone is

answered. The same individual said that riders often hang up the phone after being on hold for over five minutes.

Reservations, denials, and wait lists. No riders mentioned being placed on a wait list when requesting a trip. Riders and agency professionals were aware that Gwinnett County Paratransit may negotiate pickup times.

On-time performance. Riders and agency staff unanimously agreed that drop-offs were generally on-time. Two agency staff cited late pickups as a concern. One mentioned that dialysis patients sometimes must wait an extra 90 minutes for the next available bus if there is a delay in their treatment.

Travel times. Only one interviewee cited an instance of a long travel time in which the family of a rider was concerned when the rider did not arrive at home on time. Four of the nine interviewees mentioned that over a year ago, it would have been more common to have an excessively long trip.

Drivers. Most riders said that their drivers were courteous, respectful, and aided the riders as requested. Only one person cited a specific example in which the bus driver refused assistance to a woman trying to board the bus. Most riders believe that their drivers know the Gwinnett County paratransit service area. One agency staff member overheard a rider giving directions to a driver on one occasion.

Resolving complaints. Two of the nine interviewees have never had to make a complaint. Five of the remaining seven individuals who complained to Gwinnett County about the paratransit service were satisfied with the County's response. One rider said that her complaint was never acknowledged.

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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 GCT's complementary paratransit service is provided below, 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 "GCT Paratransit Service Rider's Guide" (Rider's Guide). In particular, page 6 of the Rider's Guide states:

Transportation is provided within a ¾ mile corridor on either side of the existing local fixed route services in Gwinnett County. This service can be used for work, school, shopping, recreation, medical appointments, etc. Gwinnett County Paratransit Service provides transportation that is comparable to the fixed route system in the area, service times, and travel times.

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 for GCT's paratransit service.

The two-part eligibility application form for GCT paratransit service can be found easily on the GCT website and is provided in four languages in addition to English. The form may also be obtained by calling Gwinnett County Customer Service. Versions of the form in additional languages and accessible formats are available through Customer Service, as is assistance with completing the application. While the Rider's Guide indicates that the applicant may be asked to attend an in-person interview, that is not currently part of the eligibility determination process. There is no application fee.

GCT issues a photo identification card to approved applicants. Photos are taken at Gwinnett County Customer Services, located in Duluth, GA. The offices are accessible by a GCT bus route and a paratransit trip will be provided free of charge upon request. There is no charge for the initial card and lost ID cards are replaced for a \$5.00 fee.

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, four deficiencies were found with some of the information requested in the GCT paratransit eligibility application. Two advisory comments are also made.

One involves use of the information provided by the licensed/certified professional regarding the applicant's need for a PCA or service animal. The other concerns the use of operational information requested during the eligibility determination process to help GCT provide trips for eligible individuals rather than to make eligibility decisions.

Eligibility Process and Materials. The review team examined the information about paratransit eligibility on the GCT website and in the Rider's Guide, reviewed the agency's paratransit application form, and discussed the eligibility determination process with the Transdev subcontractor who makes eligibility determinations.

Transdev subcontracts with Marita Wellage-Reilly, of MWR & Associates (MWR), based in Texas, to conduct the eligibility determination process for GCT. MWR has served in this capacity for approximately 18 years, under contract to GCT and previous service contractors.

The application form consists of two parts. Part A is to be completed by the applicant. It includes questions about the individual's ability to use fixed route service and requests the name of and contact information for a licensed/certified professional and the consent of the applicant for the professional to share information with GCT that is relevant to the paratransit eligibility decision. The licensed/certified professional may be a physician, occupational therapist, speech pathologist, special education teacher, nurse practitioner, physician's assistant, mental health counselor, orientation/mobility specialist, respiratory therapist, vocational rehabilitation counselor, or recreation therapist employed by a medical facility. Applicants are encouraged to designate a professional who is knowledgeable about the individual's functional ability. When GCT receives a completed Part A, GCT sends Part B to the designated professional. An application is considered complete when GCT receives the completed Part B.

Applicants are requested to mail Part A to GCT at the county customer service center. A Transdev staff person date stamps the application, sends Part B to the designated professional, and handles any communication with the applicant and the professional. Part B is date-stamped when received; both parts of the application are scanned and emailed to MWR.

MWR prepares a cover sheet for each application, together with a monthly summary sheet showing key processing dates (application received by GCT, application received by MWR, and determination), the category of eligibility granted, and a summary of the reason for the decision. Those summaries are sent to Transdev. The Transdev staff person prepares the appropriate determination letter and sends it to the applicant, keeping a copy along with the application in the individual's file.

Part A first asks for contact information for the applicant, medical names of disabilities or medical conditions, duration of the disability/condition, and medications taken for it. Most of the remaining questions pertain to effects of the applicant's disability or medical condition and his or her functional ability to use the fixed route system. Several questions relate to the applicant's needs while traveling, which may be used to help GCT provide service if the individual is determined to be eligible, but not as determining factors in the eligibility decision. For instance, question #22 asks "Do you require a personal care assistant (PCA) to travel with you to provide transportation assistance? Yes or No. If yes, please explain the specific assistance you require."

GCT may ask an applicant if he or she travels with a PCA, so that it may plan for providing service to that individual. However, asking whether a PCA is needed to provide transportation assistance is inappropriate, as a PCA may provide assistance with other daily tasks unrelated to taking a paratransit trip. In addition, asking what functions the PCA performs for the individual is also inappropriate, as that information is highly personal and not necessary for an eligibility determination.

Questions #32-35 ask about mobility training the applicant may have received in the use of GCT's fixed route system or another public bus system. There was no indication from the review team's discussions with individuals who make eligibility determinations for GCT or in the sample of determination letters reviewed that paratransit eligibility decisions are based on such factors, so this issue is the subject of an advisory comment.

Part B, which is to be completed by a wide range of licensed or certified professionals, is very similar to Part A. Question #11 asks, "Does the applicant require the use of a service animal? Yes or No. If yes, what type of animal and for what function was the animal trained?" Question #14 asks, "Does the applicant require a personal care attendant (PCA) to travel with them? Yes or No. If yes, please explain." As discussed above with regard to the applicant's section of the application, it is inappropriate to ask the designated professional about the assistance a PCA provides to the applicant, as the designated professional may have little or no knowledge.

Discussions with GCT staff indicated that whether or not an individual uses a PCA or a service animal is determined solely on the basis of the information provided by the applicant rather than by information provided by the designated professional, who may not have sufficient knowledge or information to make a correct determination of the applicant's needs. However, since Parts A and B of the current application request the information from both parties, this issue is the subject of an advisory comment.

Question #9 asks whether the weight of the applicant's wheelchair/scooter is 600 pounds or more and if so, how much the occupied device weighs. Question #10 asks if the applicant weighs over 600 pounds. The capacity of the lifts on the GCT paratransit vehicles is 800 pounds, as stated in the Rider's Guide (page 31), so the application should be revised accordingly. In addition, the weight of an applicant and his or her mobility device may be used to plan for providing service if the individual is found to be eligible for paratransit service, but not used as a determining factor in the eligibility decision. Weight is not one of the regulatory factors for eligibility. It is possible for an individual to meet the eligibility requirements, but be unable to use the system because the weight of the occupied wheelchair exceeds the capacities of the fleet. There was no indication from the review team's discussions with individuals who make eligibility determinations for GCT or in the sample of determination letters reviewed that paratransit eligibility decisions are based on such factors, so this issue is also covered by the first advisory comment noted above.

A copy of the current application form can be found in Attachment D.

Eligible riders, application volume, and certification outcomes. At the time of the review, GCT records showed that 298 individuals were registered as ADA paratransit eligible.

During 2019, an average of 13 applications were received each month. Table 6.1 shows the determination decisions for the 151 applications received in 2019.

Table 6.1 – GCT Paratransit Service 2019 Eligibility Determination Statistics And Outcomes

Applications received	151
Applicants determined unconditionally eligible (% of completed)	139 (92%)
Applicants determined conditionally eligible (% of completed)	4 (2.6%)
Applicants determined temporarily eligible (% of completed)	5 (3.3%)
Applicants determined ineligible	3 (2%)
Eligibility appeals	0

Review of sample determination files. To assess whether the third-party reviewer properly applied the regulatory criteria for eligibility, the review team reviewed files for 31 eligibility determinations. Among the sample, 24 were new applications, six were recertifications, and one did not have a new/recertification designation. The sample included: 26 determinations that found applicants unconditionally eligible, two that found applicants conditionally eligible, one determination of temporary eligibility, and two that found applicants not eligible. The sample was selected from determinations made between February and December 2019.

All of the applicants appeared to have been appropriately determined to be eligible or ineligible. Eligibility is strictly limited to individuals who meet the regulatory requirements, i.e., are not able to board, ride, and disembark independently from an accessible fixed route bus, or are unable to travel to and from a bus stop. Note that while GCT grants conditional eligibility to some applicants, conditions are not enforced, and individuals with conditional eligibility receive all of the trips they request regardless of conditions in effect at the time.

Corrective Action and Schedule: Within 60 days of the issuance of the final report, GCT must submit a revised paratransit eligibility application form, Part A and Part B, that addresses the following issues:

Part A

- Should ask the applicant if he or she travels with a PCA and must not refer to the provision of “transportation assistance” by the PCA
- Must not ask the applicant what functions the PCA performs

Part B

- Must not ask the licensed or certified professional about the functions that a PCA performs for the applicant
- Should refer to the actual weight capacity of the lifts on the GCT paratransit fleet (800 pounds) rather than 600 pounds

Advisory Comments: It is an effective practice collect operational information in the paratransit eligibility application that will help the transit agency to provide service to the individual if eligibility is granted. Information about travel training, weight of a mobility device when

occupied by the applicant, and the applicant's need to travel with a PCA or a service animal to provide assistance may not be used to make eligibility determinations, however.

In addition, GCT may not rely upon the designated professional's response as to the individual's decision to use a service animal or employ the services of a PCA to perform personal functions as a factor in the paratransit eligibility decision. That information must come from the applicant, as the professional may not be aware of the individual's need for either a PCA or a service animal.

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 GCT communicates the availability of materials in accessible formats to applicants and potential applicants.

Team members examined GCT's public information materials, website information, and ADA paratransit eligibility materials. As noted in the Rider's Guide (page 2) GCT provides eligibility information and materials in alternate accessible formats (and additional languages) upon request. Potential applicants may request materials by calling the Gwinnett County customer service center at 770-822-5010 and selecting the option for obtaining assistance with GCT issues (number 3 on the menu of choices). GCT staff indicated that accessible formats include large print, audio tape, and braille, but also any format that would be usable by an applicant. When receiving a request for eligibility materials in an accessible format, customer service representatives contact the transit division director and discuss the best way to accommodate the individual's needs.

The GCT phone number at the county's customer service center is also provided on the GCT website on the Accessible Services page.

As appropriate, GCT's eligibility staff discusses the need for information in accessible formats during the eligibility interview. If the applicant indicates the for large type, staff prints sample information in various font sizes to determine the format that works best for the individual. This is then recorded in the applicant's file and used for subsequent communications.

GCT eligibility staff indicated that they often produce information in large type. GCT can also produce information in braille, but that no requests for braille have been received in recent years. GCT has reached out to local organizations about braille capability and has identified an organization called Clover Nook that is able to produce material in braille. This organization has indicated a turnaround time of one to two weeks depending on the size of the document.

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, one deficiency was found with the requirement to have a presumptive eligibility process in place and/or make an eligibility determination within 21 days of receipt of a complete application, and with how GCT communicates presumptive eligibility to applicants. One advisory comment is made about informing applicants of the practice of presumptive eligibility for those whose eligibility determination is not made within 21 days.

GCT paratransit applicants are requested to mail Part A of the application to GCT at the county customer service center. Transdev staff mails Part B to the health care professional indicated in each application. GCT considers applications to be complete when both parts of the application are completed: Part A completed by the applicant; and the verification of disability by professionals in Part B. The 21-day processing time begins on the day that the completed Part B is received by GCT. As mentioned above, MWR & Associates receives completed applications from Transdev and returns them, with a summary cover sheet for each application and a monthly summary that notes key processing dates. After receipt of the eligibility decision from MWR, Transdev prepares and sends the appropriate determination letter to the applicant.

There is no discussion of presumptive eligibility on the GCT website, in the Rider's Guide, or in the eligibility application form.

The review team examined 32 determination files from calendar year 2019 and noted the dates of the following stages in the determination process: receipt of completed applications by GCT, scanning and emailing of completed applications to MWR & Associates, decisions by MWR, and dates on letters of determination sent to applicants. The number of days between the receipt of the completed applications and communication of determinations of eligibility to applicants were then calculated. Table 6.2 shows the results of this analysis. For this sample, 44 percent of determinations were made within 21 days. 18 determinations, or 56 percent, took more than 21 days.

Table 6.2 – Eligibility Determination Processing Times for 32 Applicants in 2019

Processing Time (Days)	Number of Determinations	% of Determinations
1–7 days	2	6%
8–14 days	4	13%
15–21 days	8	25%
22+ days	18	56%
TOTALS	32	100%

The review team also calculated the number of days between each stage of the eligibility determination process. Table 6.3 shows the results of that analysis.

Table 6.3 – Processing Times by Stage for 32 Applicants in 2019

Range	Days, Completed Application to Transmission to MWR	Days, Transmission to MWR to Determination	Days, Determination to Letter	Total Days, Application to Letter
Minimum	0	1	0	2
Maximum	15	45	31	63
Average	3.5	9.7	11	24.3

In this sample of 32 applications, applications were scanned and sent to MWR on the same day or up to 15 days after their receipt by Transdev, with an average of 3-4 days. Determinations were made on the next day to up to 45 days after receipt of applications by MWR, with an average of 10 days. Letters were sent to applicants on the same day as receipt of the eligibility determination from MWR by Transdev to up to 31 days later, with an average of 11 days. Total elapsed time between receipt of a completed application to the date on the applicant's determination letter ranged from two to 63 days, with an average of 24 days. GCT must establish procedures for granting presumptive eligibility and providing access to GCT paratransit service to individuals whose eligibility determination is not made within 21 days of receipt of a completed application.

Corrective Action Schedule: Within 60 days of the issuance of the final report, GCT must provide evidence that it has developed procedures for granting presumptive eligibility and providing access to GCT paratransit service to individuals whose eligibility determination is not made within 21 days of receipt of a completed application and submit a description of those procedures.

Advisory Comment: It is an effective process to include language in the material sent to prospective GCT paratransit applicants that they will be considered presumptively eligible and will be able to use the service if a decision is not made within 21 days. Instructions for requesting service beginning on the 22nd day is also useful. Information about presumptive eligibility should also be included in the Rider's Guide and on the GCT website.

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, five deficiencies were found with the determination letters sent to some applicants and the information about the applicant's right to appeal that is sent with eligibility determination letters. Two advisory comments are made: one regarding provision of information with determination letters about obtaining the required photo identification card; and one regarding methods of providing information about the appeal process to applicant who do not receive unconditional eligibility.

GCT provides written determinations of paratransit service eligibility. Team members examined letters sent to applicants for 31 determinations made between February and November 2019. This included 26 letters finding applicants unconditionally eligible, two letters finding applicants conditionally eligible, one letter granting temporary eligibility, and two letters to applicants determined to be not eligible.

Applicants found to be eligible receive a letter. The letter contains all of the information required by the regulations. The letter states that GCT has determined that the individual is "eligible for ADA paratransit service." The letter also includes "Level of Service" and category of eligibility; for example, "Level of Service—Category 1 – Applicant cannot independently navigate the transit system." The phone number for the paratransit reservation line and its hours of operation are also provided in the letter.

Letters sent to applicants who have been determined to be eligible include a date until which the eligibility is valid. In the sample of letters examined by the review team, expiration dates were three years beyond the date of the eligibility decision, not the two years which is the GCT recertification policy and stated in the Rider's Guide.

Letters sent to eligible individuals do not include instructions for obtaining the GCT Breeze ADA paratransit photo identification card that riders are required to present when using GCT paratransit service. The letters refer eligible individuals to the Paratransit Service Rider's Guide for information about service policies and answers to frequently asked questions and note that the guide can be mailed upon request. The Rider's Guide provides the menu option at the county's customer service center for more information about the GCT Breeze ADA paratransit photo identification card.

Letters sent to individuals who received temporary eligibility or were denied eligibility in the sample of 31 eligibility files examined by the review team included specific details for the decisions. Letters to those who received conditional eligibility did not include the specific conditions under which paratransit service could be used; those applicants receive a letter of unconditional eligibility. The information recorded in the application cover sheets and monthly summaries prepared by MWR & Associates, however, does include a description of conditions for individuals determined to be conditionally eligible.

Letters to those denied eligibility include the following language regarding appeals of the determination:

If you wish to appeal this determination, you must do so within 30 days of the receipt of this notification. Appeals must be sent in writing by U.S. Mail and should be addressed to:

Gwinnett County Transit
Re: Eligibility Appeal
3525 Mall Blvd. Suite 5-C
Duluth, GA 30096

Under §37.125(g)(1), GCT must provide at least 60 days for individuals to file an appeal of their eligibility determinations. In addition, the Rider's Guide states that appeals must be filed within 60 days. While GCT may require individuals to request appeals in writing, the basis or reasons for the appeal and other information cannot be required to be in writing. Individuals must have the option of presenting information in person at an appeal hearing, as correctly stated in the Rider's Guide (page 14). Letters must be revised to reflect these changes.

Corrective Action Schedule: Within 60 days of the issuance of the final report, GCT must provide evidence that it has revised its eligibility determination letters to address the following:

- Letters sent to individuals who are granted conditional eligibility do not describe the conditions under which GCT paratransit service may be used
- Letters incorrectly state the period during which eligibility is valid as three years, not two years
- Letters incorrectly state that individuals have 30 days in which to file an appeal, rather than 60 days
- Appeals are incorrectly required to be submitted in writing
- More information about the appeals process must be provided, including the opportunity for the individual to attend an appeal hearing and present information related to the appeal in person

Advisory Comments: It is an effective practice to provide instructions for obtaining the required GCT Breeze ADA paratransit photo ID card with letters sent to individuals who are determined to be eligible for the service. It is also an effective practice is to enclose a copy of the GCT paratransit appeal process with letters sent to individuals who are determined to be not eligible, conditionally eligible, or temporarily eligible, or to add a description of the appeal process to the GCT website and provide links or direction to the website and/or the Rider's Guide within eligibility determination letters.

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, one deficiency was found with the GCT paratransit recertification process, due to language on the recertification application form regarding the applicant's need for a PCA. An advisory comment is made regarding how GCT communicates recertification of eligibility to applicants.

Full-term eligibility for GCT paratransit service is granted for a period of two years. Transdev staff mails a recertification application to riders whose eligibility is set to expire three months ahead of the expiration date. The application form includes Section 1, to be completed by the applicant, and Section 2, to be completed by a health care professional (the list of acceptable licensed/certified professionals is slightly different than the list provided on the initial eligibility application). Both sections are briefer than Part A and Part B of the initial eligibility application. While the Rider's Guide (page 14) states that failure to return the application in a timely way may result in a loss of service, GCT extends presumptive eligibility to recertifying riders until the application process is complete to avoid a disruption in service.

Section 1 of the recertification application (page 4) includes the following question:

Do you require assistance of a Personal Care Attendant (PCA)? Yes or No. A PCA is someone who travels with you to assist you with daily life functions. Please NOTE: We may require you to travel with a PCA if your condition or disability is severe.

GCT may not require a rider to travel with a PCA.

As noted earlier, letters in the sample of eligibility files examined by the review team grant three years of eligibility, while GCT requires riders with full-term eligibility to apply for recertification every two years.

Corrective Action Schedule: Within 60 days of the issuance of the final report, GCT must submit a revised paratransit eligibility recertification application that removes the language pertaining to GCT's requiring individuals to be accompanied by a PCA.

Advisory Comment: It is an effective practice to ensure that letters sent to applicants correctly state the length of time for which eligibility is valid. Letters should be revised to grant unconditional or conditional eligibility for a period of two years.

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, three deficiencies were found with the requirements of the process for appealing eligibility denials or decisions that limit eligibility and with how the transit agency communicates the appeal process to applicants. An advisory comment is made regarding the communication of the appeal process and appeal policies to applicants and to the public.

The review team examined information about GCT's appeal process and policies contained in the Rider's Guide (pages 14) and letters sent to individuals who are denied eligibility and discussed the appeal process with the transit division director.

As noted above, letters sent to individuals who are denied eligibility require appeals to be filed within 30 days of the determination letter while the Rider's Guide indicates that the period for filing an appeal is 60 days. In addition, determination letters incorrectly require appeals to be submitted in writing and provides a mailing address, but do not describe the process in any more detail.

The Rider's Guide provides more information about the appeal process:

What If My Application Is Denied

If an applicant is denied eligibility, the applicant may appeal the decision either in writing or be heard in person. Appeals must be filed in writing within sixty (60) calendar days from the date of the notification letter to the applicant denying eligibility.

Mail the Letter of Appeal to:

Gwinnett County Transit

Re: Eligibility Appeal

3525 Mall Boulevard, Suite 5-C Duluth, GA 30096

Upon receipt of your letter of appeal, GCT will notify you of the location and time of the appeals hearing to be conducted within thirty (30) days. Applicants will have the opportunity to appear before an Appeals Committee. The applicant must provide his/her own transportation to the appeals hearing.

The Appeals Committee is a three (3) person board consisting of individuals not involved in the original eligibility determination. You will have the opportunity to be represented at the hearing and you may present information and arguments. Within thirty (30) days of the hearing, applicants will be notified in writing of the Appeals Committee's decision by mail. The decision of the Appeals Committee will be final.

To date, GCT has not received any appeal requests from applicants. The transit division director indicated that an appeal committee would be composed of representatives of the county and the paratransit service contractor, excluding the subcontractor who makes eligibility determinations and the service contractor staff members who are also involved in the process.

The appeal process as described in the Rider's Guide must not limit those who may file appeals to individuals who are denied eligibility but must also include individuals who are granted conditional or temporary eligibility. The description of the process must also make it clear that while requests for an appeal are required to be submitted in writing, the individual may choose to present the basis or reasons for the appeal at a hearing and not in writing. While the description in the Rider's Guide notes that final decisions will be made within 30 days of the date of a hearing, GCT must develop procedures for providing paratransit service to appellants if decisions are not made within that timeframe.

Corrective Action Schedule: Within 60 days of the issuance of the final report, GCT must develop and submit revised public information about the GCT paratransit eligibility appeal process. The information must indicate that applicants have the right to appeal if the initial determination limits their eligibility in any way, including finding them ineligible for a shorter term, setting conditions on their eligibility, or denying eligibility. In addition, the letter must inform potential appellants that they are not required to submit the basis or reasons for their appeals in writing. GCT must also inform applicants who are appealing that presumptive eligibility will be provided should appeal decisions not be made in the regulatory timeframe of 30 days after the hearing.

Advisory Comment: It is an effective practice to provide full and consistent information about the GCT paratransit appeal process and policies in all communications with applicants and the public. GCT currently provides somewhat different and partial information in the Rider's Guide and the letters sent to individuals who are denied eligibility.

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 visitors to apply for or receive eligibility certification for its own paratransit service before providing this service.

Discussion: During this review, a deficiency was found with the requirement to provide paratransit service to visitors who do not have documentation of eligibility from another public entity. Two advisory comments are offered, regarding the provision of information to visitors about accessing GCT's paratransit service and the use of the term "presumptive eligibility" in relation to service for visitors.

GCT's policy regarding service for visitors is included in the Rider's Guide (page 31); that description is to on the Accessible Services page of the GCT website:

What About Visitors With Disabilities?

Visitors to Gwinnett County who are functionally disabled will be given "presumptive eligibility" and can ride GCT ADA paratransit service for up to twenty-one (21) days (per) year without being certified by GCT. Visitors must provide proof of disability when boarding the vehicle by presenting an ADA identification card from another transit system.

The GCT ADA paratransit photo identification card will be recognized throughout the United States and passengers may use it to ride paratransit service wherever it is available. Check with the local transit provider for the exact rules and regulations for scheduling a trip.

If your plans require you to travel in other metro Atlanta service areas, you must make a reservation with the GCT paratransit service and with the other service agency (that is, MARTA and Cobb Community Transit; CobbLinc). GCT reservation agents can provide reservation numbers for contacting the other metro Atlanta transit systems.

This policy does not include any provision for providing service to visitors with disabilities who do not have documentation of ADA paratransit eligibility from another public entity. GCT may require documentation of such an individual's place of residence and, if the individual's disability is not apparent, of his or her disability. In addition, the policy does not provide any information about how a visitor, even with credentials from another paratransit system, may reserve and obtain a trip on the GCT paratransit service.

Corrective Action Schedule: Within 60 days of the issuance of the final report, GCT must submit evidence that it has revised its visitor policy so that individuals who do not have documentation of ADA paratransit eligibility from another public entity can request service as a visitor by providing documentation of their place of residence and, if the individual's disability is not apparent, of his or her disability.

Advisory Comment: Applying "presumptive eligibility" to visitors 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).

It is also an effective practice to make information readily available to visitors, including those with and without documentation from another paratransit system, about how to reserve and obtain a trip on GCT's paratransit service. Information should be included on the GCT website.

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 Gwinnett County's policies and practices to provide paratransit service on an origin-to-destination basis.

According to the Rider's Guide, the transit agency's basic level of service is curb-to-curb, with door-to-door service available upon request. The Guide defines curb-to-curb service as "the customer will be picked up at the closet [sic] curb to the pick-up location and will be taken to the closet [sic] curb of the drop off location" (page 6).

In interviews with review team members, paratransit drivers understood the need to provide passengers with additional assistance as required.

6.4 Service Criteria

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 public 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 complementary 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 requirement to provide ADA paratransit service available to eligible individuals to and from origins and destinations within the service area.

Review team members observed reservation agents and dispatchers clearly communicating the service area requirement to individuals requesting service. These agents rely upon Trapeze paratransit software to automatically determine whether a requested pickup or drop-off address is located within a 3/4-mile radius of fixed route service. The Rider's Guide also states that

“Transportation is provided within a 3/4-mile corridor on either side of the existing local fixed route services in Gwinnett County” (page 6). In addition, the Gwinnett County Transit website (under the “Accessible Services” page) provides a map that delineates the paratransit service area. The northernmost part of the paratransit service area is representative of a former fixed bus route that no longer exists.

Response Time

Requirements: 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 the pickup time with the rider prior to a trip being scheduled, it cannot require the rider to schedule trips to begin more than one hour before or after the rider’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 GCT’s response time requirements or how the transit agency negotiates with callers regarding requested pickup times. Advisory comments are offered concerning: inconsistent statements in the Rider’s Guide about the hours of call-takers; reminding riders of the number of days ahead that they may request a trip; and call-takers’ understanding of the allowed negotiating window.

GCT accepts calls for trip requests Monday to Saturday, 8 a.m. to 5 p.m. Riders may request trips for one to three days in advance. On Sundays, riders may leave a voicemail for trip requests only for the following Monday. This is not consistent with information provided in the Rider’s Guide: “Representatives are available during our normal business hours from Monday through Friday for trip reservations” and voicemail is available on Saturday and Sunday (page 16).

In addition, an older version of the Rider’s Guide that had been on the GCT website indicated that reservations were taken only one day in advance. This may explain the nature of the trip requests observed by the review team, as described in the following paragraph.

Review team members observed call-takers accept trips requests during two periods: the afternoon of Tuesday, February 4 and the morning of Wednesday, February 5. Overall, team members observed requests for 24 trips. Of the incoming calls for paratransit reservations, all but

one were for the next day (i.e., trips for February 5 during February 4 calls; trips for February 6 during February 5 calls).

While the Rider's Guide says that a rider may request a "no later" time, all callers reserved their trips by pickup time, even when there was call clearly indicated that there was an appointment, e.g., medical appointment. In addition, the call-taker offered the caller the exact time requested in all but one of the 24 trips. One call-taker said that if the Trapeze software did not generate a trip solution for the requested pickup time, he entered the requested time and would work on creating a solution later in the day or during the morning of service. GCT is free to offer the precise pickup time that a rider requests without any negotiation of the time. However, it was not clear that the call-takers understood that the regulations (and GCT policy) allowed them to negotiate.

Call-takers also responded to calls for other purposes:

- Inquiring on the status of a vehicle that the caller was waiting for ("Where's my ride?")
- Confirming pickup times for future trips
- Changing trip requests
- Canceling trip request
- Eligibility questions

Advisory Comments: It is an effective practice for Gwinnett County Transit to correct the Rider's Guide to state that calls are answered by phone Monday through Saturday and that trip reservations may be requested via voicemail on Sunday. In addition, it is an effective practice for call-takers to be reminded of the policy that allows riders to request a trip up to three days in advance. The call-takers could then remind riders of this policy over the phone. In addition, it is an effective practice for call-takers to negotiate pickup times with riders (within the allowed window of -60/+60 minutes) if it will result in more reasonable and efficient routes for operators.

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 system 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 Gwinnett County Transit's complementary paratransit fare policies and practices concerning fares.

Gwinnett County Transit's base fare for fixed route service is \$2.50 per trip. Certain express bus routes have fares of \$3.75 or \$5.00. The transit agency charges \$4.00 per trip for its ADA paratransit service. Riders are permitted a PCA to accompany them, free of charge. Gwinnett County Transit allows riders to travel with one companion in addition to the PCA. Additional

companions may travel with the rider if space is available. Companions are charged \$4.00 per ride.

A paratransit rider may also transfer between GCT paratransit and fixed route service. If the fare of the first leg of the trip is higher than the second leg (e.g., from paratransit to local bus), then the rider pays no additional fare; if the fare of the second leg is higher (e.g., from paratransit to \$5.00 express bus), the rider pays the difference for the transfer.

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 review team did not observe GCT call-takers restrict or prioritize any trip request or trip scheduling based on the purpose of the trip. All trip requests were granted, regardless of purpose.

GCT does distinguish based on trip purpose when a rider requests a “same-day hold” (often known as “will calls” at other agencies). This occurs when a rider requests that a pickup be postponed; the rider then calls to notify dispatch when he or she is ready to be picked up. GCT permits a same-day hold when the trip is a return trip from a medical facility or government office. Since same-day holds are a premium service, GCT may choose to prioritize based on trip purpose.

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 ADA complementary paratransit service, at minimum, from 5 a.m. until 9 p.m.

Discussion: During this review one deficiency was found with the requirement that GCT paratransit be provided during the same hours as fixed route service.

According to the Rider’s Guide, “GCT complementary paratransit services are provided Monday through Saturday. The service hours are the same as the local fixed route bus service” (page 11). Paratransit services hours do not vary by the area covered. The review team observed that paratransit operations begin at 5:30 a.m. and ends at 9:30 p.m. on weekdays. On Saturday,

paratransit service begins at 6:00 a.m. and ends at 9:30 p.m. The weekday paratransit starting time is slightly later than the fixed route starting time. The weekday and Saturday paratransit ending times are earlier than the fixed route ending times. Table 6.4 compares GCT paratransit hours with fixed route (FR) hours.

Table 6.4 – Comparison of GCT Paratransit Service Hours and Fixed Route (FR) Service Hours

Days	Paratransit Start Time	Earliest FR Start Time	Route #	Paratransit End Time	Latest FR End Time	Route #
Weekdays	5:30 a.m.	5:20 a.m.	30, 35	9:30 p.m.	10:25 p.m.	10A/10B
Saturday	6 a.m.	6:25 a.m.	35	9:30 p.m.	10 p.m.	10A/10B

There are six local fixed bus routes (10A/10B, 20, 30, 35, 40, and 45). Service hours vary by route. According to the individual fixed route bus schedules posted on the GCT website, Routes 30 and 35 have the earliest starting time of 5:20 a.m. on weekdays; Route 35 has the earliest starting time on Saturday: 6:25 a.m. The latest weekday ending time of 10:25 p.m. occurs when Route 10A/10B reaches its destination at the Doraville MARTA Station. On the Saturday, Route 10A/10B reaches its last destination at 10 p.m.

Corrective Action Schedule: Within 60 days of the issuance of the final report, Gwinnett County Transit must submit evidence that it has revised the paratransit services to operate, at minimum, during the same hours as its fixed route service. GCT must update all of its public information to inform its paratransit riders about the revised paratransit service hours.

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 provided to an eligible rider.

Discussion: During this review, no deficiencies were found with this requirement. GCT has no restriction on the number of trips that it provides to an eligible rider.

The Rider's Guide (page 16) states, "There are no daily limits on the number of reservations the passenger can request. When making a reservation for a round trip, please allow at least two (2) hours between the requested pick-up times."

When reviews team members observed call-takers, they did not observe any caps on the number of trips that a rider could request.

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 or procedures that establish waiting list(s) for accessing the service.²

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

GCT has no waiting lists for trips. Review team members did not observe any trip requests placed on a waiting list.

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 GCT's performance standard.

GCT paratransit service uses an on-time window of 0 to 30 minutes (0/+30) after the negotiated pickup time.

GCT's contract with Transdev includes the following standard for on-time pickups:

25.5 Paratransit On-Time Performance

Performance Standard: The Contractor shall achieve 100% on-time performance of all scheduled paratransit trips within the 30 minutes of the scheduled pickup time excluding cancellations and no-shows. In the event of an in-service breakdown, the bus operator's absence or other service related problems, the contractor shall dispatch another vehicle as soon as possible in order to provide service...

² 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.

Liquidated Damage: The Contractor shall be assessed a liquidated damage of fifty dollars (\$50) per out of the window trip.

GCT assesses liquidated damages only when on-time performance is below 95 percent during a calendar month. GCT considers “on time” to also include pickups that take place before the beginning of the (0/+30) window. In practice, this means that GCT’s on-time standard is 95 percent for the combination of pickups in the window and early.

GCT provided the review team with sample data that included all scheduled trips for two weeks: December 16–28, 2019. As shown in Table 6.5 of the 760 completed trips, 94.3 percent were early or on-time: 46.1 percent within the pickup window of 0/+30 minutes, and 48.3 percent early. This yields 5.7 percent of trips with late pickups. Of these late pickups, 2.4 percent were more than 15 minutes late; 1.05 percent were more than 30 minutes late.

**Table 6.5 – On-Time Pickup Performance for GCT Paratransit Trips:
December 16–28, 2019**

Trips	Number	Percent
ALL completed trips	760	100%
Early	367	48.3%
In window (0/+30)	350	46.1%
Early or in Window	717	94.3%
All late	43	5.66%
1–15 minutes late	25	3.29%
16–30 minutes late	10	1.32%
>30 minutes late	8	1.05%

This pickup performance meets GCT’s own standard. Furthermore, there are not a substantial number of significantly untimely pickups.

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, one deficiency was found with GCT's definition of a missed trip. No deficiencies were found with the number of denials or missed trips in GCT's paratransit service. No deficiencies were found with the tracking and recording of missed trips or denials.

GCT has not reported any denials in recent years. Review team members did not see any trip denials while observing Transdev staff accepting trip requests. The scheduler said that, if no solution was available in the paratransit software for a requested trip time, the staff accepts the requested time, and enters the request as "unscheduled." The scheduler or dispatcher subsequently inserts all unscheduled trip requests onto a vehicle run.

The Rider's Guide (page 26) includes GCT definition of missed trip:

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

This definition omits one category of missed trips: when a vehicle arrives before or during the pickup window, the rider does not board, and the vehicle does not wait at least five minutes within the pickup window.

During the sample period (December 16–28, 2019), GCT recorded one missed trip. The review team also reviewed all scheduled trips that were coded as passenger no-shows (total of four). All no-shows were properly coded.

Corrective Actions and Schedule: Within 60 days of receiving the final report, GCT must submit a revised definition of a missed trip to include that a missed trip occurs when a vehicle arrives before or during the pickup window, the rider does not board, and the vehicle does not wait at least five minutes within the pickup window.

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, no deficiencies were found with the number of trips with excessive trip lengths. An advisory comment is offered regarding GCT’s long-trip standard.

The Rider’s Guide (page 16) discusses GCT’s expectations and policies regarding trip length: “Customers must be aware; this is a shared-ride service. The duration of a trip may be as long as a comparable fixed route trip plus one-half (1/2) [sic] for travel and wait time.” Information that GCT provided to the review team in advance of the site visit stated, “travel time standards are established based on the average ride time that a fixed route equivalent trip would have had plus any walking time to get to the location plus 30 minutes.”

During discussions with review team members, GCT and Transdev managers explained the current monitoring procedures for travel times. They said that each month, Transdev analyzes the travel times for six paratransit trips. It compares the travel times of these trips to the travel times of the respective comparable fixed route trips:

- Two short duration trips
- Two medium duration trips
- Two long duration trips

Transdev managers use the Google trip planner linked to GCT’s website to generate the travel times for comparable GCT bus trips. If paratransit travel times are longer, Transdev investigates the reason for the longer travel times.

Based on the sample of December 16–28, 2019 completed trips, the average (mean) trip length was 25 minutes. The median trip length was 21 minutes. Only 4.5 percent of trips were longer than 60 minutes; 1.3 percent of trips were longer than 90 minutes.

The review team analyzed a sample of 20 trips from the sample period: 12 trips with travel time 46–60 minutes; and eight trips with travel time of more than 60 minutes. The team used the Google trip planner linked to the GCT website to compute the trip lengths for the comparable fixed route trips (same day of week, same pickup time, same origin and destination) of these 20 long trips. Table 6.6 presents the results of the analysis.

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

Paratransit Travel Time Compared to Fixed Route Travel Time	Number of Trips
Sample size of long trips	20
Shorter than fixed route travel time	15
1–20 minutes longer than fixed route travel time	1
21–30 minutes longer than fixed route travel time	2
> 30 minutes longer than fixed route travel time	2

Of the 20 paratransit trips, 15 had a shorter travel time than their comparable fixed route trip; one trip was within 20 minutes of its comparable fixed route trip; and two trips were within

30 minutes of their respective comparable fixed route trips. It does not appear that there are a substantial number of GCT paratransit trips with excessive trip lengths.

It is interesting to note that the review team attempted to analyze fixed route comparisons with 14 additional GCT paratransit trips, but the Google trip planner could not generate a solution. This seems to imply that the comparable fixed route trips would be so long that they were judged to be implausible.

Advisory Comment: While there does not appear to be a pattern or practice of excessive trip lengths, GCT is advised that the travel time for a paratransit trip must be comparable to a trip made between the same points using the fixed route system, including time spent getting to and from a bus stop, waiting for the bus, and transferring between buses. GCT's travel time measure already accounts for time spent traveling to and from a boarding location, but adds an additional 30 minutes beyond. This is inappropriate and should be corrected before a pattern or practice of excessive travel times manifests itself.

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, a deficiency was found with GCT's monitoring of telephone system performance for paratransit service. No deficiencies were found with GCT's standard for telephone hold times. Two advisory comments are offered regarding monitoring of telephone system performance.

Transdev's contract states that "Calls cannot be placed on hold for more than two (2) minutes" (Section 2.2.2.2, "Paratransit Reservations and Scheduling").

However, at the time of the review team's site visit, the telephone system used by Transdev call-takers and dispatchers for GCT paratransit service did not provide data on incoming telephone calls, including data on hold times. As a result, GCT was not able to monitor telephone hold time performance.

According to the GCT transit director, Transdev is responsible for providing the telephone system. This includes providing data on telephone system performance. According to the transit director and Transdev managers, Transdev was planning to move the trip reservations staff to another facility (GCT's customer service center) in late February 2020. Transdev managers said that they would have the capability to collect telephone performance data at this facility and would do so.

Review team members observed Transdev staff accept trip requests on February 4 and 5, 2020. Team members observed that Transdev staff 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, GCT must provide evidence that it is monitoring telephone hold time performance for its paratransit service. If GCT identifies patterns or practices of long telephone hold times, it must identify and take actions to eliminate these long telephone hold times.

Advisory Comments: It is an effective practice for GCT to ensure that Transdev provides telephone performance data that corresponds to its standard, i.e., data that indicates what percent of telephone calls are on hold for over two minutes. It is also an effective practice for GCT to ensure that Transdev provides telephone hold data in small time intervals (e.g., hourly) so that GCT 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, no deficiencies were found with the requirement to provide timely drop-offs for trips with known appointment times. Two advisory comments are also made regarding tracking trips with known appointment times and establishing performance standards. GCT does not have a standard for paratransit drop-off performance. GCT does not monitor drop-off performance on an ongoing basis.

In the sample paratransit trip data of the two weeks analyzed by the review team (December 16–28, 2019), only 14 of the 760 completed trips (1.8 percent) had requested drop-off times. Furthermore, these 14 trips were taken by only three different riders. All 14 drop-offs were on time, i.e., arrived before the requested appointment time. The arrival times ranged from six to 37 minutes prior to the appointment time.

Advisory Comments: It is an effective practice for GCT to establish a standard for on-time drop-off performance. It is also an effective practice for GCT 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, no deficiencies were found with the requirements concerning the provision of subscription trips as part of the ADA paratransit program or with how GCT communicates this requirement to eligible riders and potential users of the service. Because there

GCT has not been denying trip requests or experiencing capacity constraints (with respect to trip demand), GCT does not have to limit the proportion of subscription trips.

The Rider's Guide (page 19) explains the available subscription service:

If you need a ride to the same place, at the same time, and at least three (3) days per week, "Subscription Service" may be a good option for you. This service allows you to schedule these recurring trips with one call. You will then automatically be placed on the schedule each week. Ask the reservation agent about this option...

You can put your subscription trip on "hold" for up to three (3) months. Then, when you are ready to have your Subscription Service taken off hold, call GCT Paratransit seven (7) days in advance to reinstate the subscription. If you need to put your subscription trip on hold for a longer period than three (3) months, we may ask you to call back and request a new Subscription Service at the time it is again needed.

For a sample week (January 27–February 1, 2020), subscription trips comprised 22 percent (86 of 384) of all scheduled paratransit trips during weekdays and 26 percent (10 of 38) of scheduled paratransit trips on Saturday.

At the time of the review team's site visit, GCT had placed a cap on the number of subscription trips. Transdev staff would add new subscription trips only as existing subscription trips discontinued.

6.6 Reasonable No-Show Policies and the Right to Appeal

Requirements: 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 agencies 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 within 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 agency error, must not form a 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 appeal 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 GCT's no-show policy. No deficiencies were found with GCT's procedures for imposing a suspension of service for individuals who exhibit a pattern or practice of missing scheduled trips, the length of potential

suspensions of service, the process for appealing proposed suspensions of service, or how the GCT communicates these requirements to eligible riders and potential users of the service.

GCT's policies and procedures regarding no-shows and late cancellations are described in the Rider's Guide (pages 25-28). The policy states that riders will be considered no-shows if they have not called GCT to cancel a trip at least one hour before the scheduled pickup time, cannot be reasonably seen to be approaching the vehicle within five minutes of the time that the vehicle arrives at the scheduled pickup location within the 30-minute pickup window, and dispatch has been notified to verify that the vehicle is at the correct location. It also notes that trips cancelled at the door (i.e., rider informs driver that he or she will not take the trip when vehicle arrives at pickup address) will be treated as no-shows. The policy lists examples of factors beyond the rider's control that would justify lack of a timely cancellation of a scheduled trip, as well as examples of errors on GCT's part that would likewise not result in a rider being charged with a no-show.

The Rider's Guide (page 27) explains how GCT determines that a rider has exhibited a pattern or practice of missing scheduled trips:

GCT evaluates a pattern or practice of missed trips based on a rider's frequency of paratransit service use as compared to established thresholds (see table).

- GCT may suspend for a reasonable period of time, provision of paratransit service to an eligible person who has established a pattern or practice of missing scheduled trips.
- A Practice of "No Show" is considered when No Shows total 10% or more of a customer's total trips in a rolling 30-day period, and may result in a penalty.

Determining Pattern or Practice of Excessive No-Shows

Scheduled Trips Per Rolling 30-Day Period and Not Canceled in Advance	Number of No Shows Per Period Which Equals a Violation
1-15	2
16-30	3
31-40	4
41 or more	5

GCT's no-show suspension policy is inadequate due to the fact that it relies on a simple percentage of missed trips, regardless of the frequency of a rider's use. Under this policy, a rider making 10 trips in a month would face suspension after missing just two; two missed trips is insufficient to establish the existence of a pattern or practice. To help define what constitutes an pattern or practice, FTA recommends that transit agencies establish a two-step process. The first step is to establish thresholds for suspensions that represent multiples of the systemwide average. For example, if the systemwide average for no-shows is 5 percent of all scheduled trips, the threshold for potential suspensions might be greater than 10–15 percent. The second part is to establish thresholds for the minimum number of no-shows within a given interval, below which suspensions would not be imposed. For example, a pattern or practice might be defined as three or more no-shows in a given month that exceed 10 percent of scheduled trips. If the policy only

set a 10 percent frequency and did not also include at least three no-shows, a passenger taking only 10 trips in a month would face suspension after a single no-show, which would not represent a pattern or practice.

Each time a rider appears to no-show for a scheduled trip, a customer service agent calls the rider to determine whether the trip was missed for reasons beyond the rider's control or due to a GCT error. If the missed trip was a confirmed no-show, the rider is reminded of the policy and the potential for a service suspension.

Penalties for violations of the no-show policy are shown in a table in the Rider's Guide (page 27):

Consequences for an Established Pattern or Practice of No-Shows

Violation	Consequence
1st Violation	Letter of Warning and/or Phone Contact
2nd Violation	2 Day Suspension
3rd Violation	3 Day Suspension
4th Violation	5 Day Suspension and Loss of Subscription Service
5th Violation	10 Day Suspension and Loss of Subscription Service
Violation History Covers a 12-month period	

As stated in the Rider's Guide (page 28):

If a customer should exceed the No-Show threshold, they will receive a suspension letter in the mail, proposing to suspend service within two weeks. All suspension notices will include a copy of this policy, information on disputing no shows or late cancellations, and how to appeal suspensions. Suspension of service privileges will be postponed pending completion of the appeals process.

Before the suspension of paratransit service, GCT shall take the following steps:

- Notify the individual in writing that GCT proposes to suspend service, citing with specificity the basis of the proposed suspension and setting for the proposed sanction
- Provide the individual an opportunity to be heard and to present information and arguments
- Provide the individual with written notifications of the decision and the reasons for it.
- If the individual wishes to appeal then the suspension will be stayed pending the outcome of the appeal.

Note that in discussions with the review team, GCT and Transdev staff indicated that the service suspension policy has never been implemented.

Corrective Action Schedule: Within 60 days of the issuance of the final report, GCT must revise its no-show policy to reflect a pattern or practice of missed trips. Alternatively, GCT may elect to eliminate its no-show policy and refrain from suspending riders.

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, a 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, a deficiency was found with GCT's complaint response procedures. In addition, an advisory comment is offered concerning the ease of availability of contact information for rider comments and complaints.

The review team interviewed the customer service manager responsible for overseeing the complaint process. The customer service manager provided a full list of paratransit complaints that occurred from January 2019 through January 2020. In addition, the review team confirmed that GCT is maintaining a record of complaints for more than five years.

Riders or other individuals may submit complaints via written letter, telephone call, or through a portal on the Gwinnett County website. The contact is no more specific than "GCT Customer Service" (page 37 of Rider's Guide). In addition, the telephone number and mailing address are included in the Rider's Guide, but not on the website.

GCT uses specialized complaint software (TransTrack) to record complaints and track resolution. For the sample period January 2019–January 2020, there were 10 recorded complaints. Four came by telephone, six by email. Based on the date information in the list of complaints, GCT staff responded to all complaints within three business days, mostly by telephone call to the complainant.

Corrective Action Schedule: Within 60 days of the issuance of the final report, GCT must designate an individual (i.e., job position) who will be responsible for coordinating GCT's activities related to accepting, resolving, and responding to complaints.

Advisory Comment: It is an effective practice to make it easier for a rider to find the contact information required in 49 CFR §37.17(b). For riders who do not have ready access to the Rider's Guide, it would be helpful to provide the telephone number and mailing address for making comments or complaints in a prominent place on the GCT website.

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: One deficiency was found with GCT's procedures for service suspensions due to rider conduct. Possible suspensions of a rider's service may be imposed due to behavior of the PCA or companions of a rider. No deficiencies were found with GCT'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. An advisory comment is made regarding the codes of conduct for paratransit and fixed route riders.

The Rider's Guide (page 35) presents a code of conduct, including prohibited behaviors, for GCT paratransit riders:

What Is My Responsibility When Riding A GCT Paratransit Vehicle?

Each passenger must adhere to the rules of conduct. The following rules of conduct are provided to ensure the safety and comfort of all GCT Paratransit passengers:

- GCT Paratransit is public transportation and a fare is required when you board the vehicle. If you do not pay a fare at that time, the driver will refuse to provide the ride. Deliberate fare evasion will be grounds for refusal of service.
- The use of abusive, threatening, or obscene language or actions towards the driver or other passengers is prohibited.
- Passengers are prohibited from eating or drinking on the vehicle unless a medical condition requires one to eat or drink at specified times. In such cases, the passenger must advise the reservation agent of this fact.
- Smoking shall be kept off of and away from the vehicle.
- The use of alcoholic beverages and illegal drugs, or riding under the influence of intoxicating alcohol or drugs, is prohibited at all times.

- The use of electronic equipment (music, games, etc.) shall be with headphones and kept at a low enough volume so as not to be heard by and disturb other passengers.
- Due to the nature of our shared-ride system, passengers should take great care in tending to their personal hygiene, showing respect to other passengers' desire for a comfortable ride.
- Passengers shall not operate or tamper with any equipment while on the vehicle. This rule includes operation of the lift and attempts to remove mobility device tie-downs or passenger seat belts.
- Baby strollers and two-wheeled collapsible carts shall be folded and stowed to avoid blocking the aisle or causing injury to persons on the vehicle.
- Be respectful of service animals and refrain from petting them without the permission of the owner.
- Trash shall be disposed of properly both on and around the vehicle.
- Parents/accompanying adults travelling with children shall maintain control of the children during the ride.
- Head, arms, and other body parts must be kept inside the vehicle.
- Objects may not be thrown from the windows.
- Federal regulations prohibit the transportation of flammable or explosive materials on transit vehicles.

The code of conduct for fixed route riders, as shown on the General Information page of the GCT website, includes the following:

- Fares are required for all passengers
- No food or drink may be consumed on the bus
- Children must be removed from strollers; strollers must be folded and stored
- Service animals may accompany riders; pets and comfort animals must be in a carrier
- Courtesy is to be exercised with electronic devices; headphones are to be used whenever possible
- Insertion of monthly passes or Breeze cards into the cash only slot of the farebox

The Rider's Guide states (page 34-35):

Passengers, their Personal Care Attendants, or their travel companions who violate rules of courtesy and conduct may be subject to penalties up to and including suspension of that passenger's service.

The DOT ADA regulations make no provision for the suspension of a rider's service due to the behavior of his or her PCA or companions; however, service to a rider's PCA or companions may be denied if they engage in violent, seriously disruptive, or illegal conduct, or present a direct threat to the health or safety of others.

The Rider's Guide describes potential suspensions of service for a rider who requires a caretaker to be present at the drop-off location to prevent the rider from being left unattended when the caretaker is not at the drop-off location (page 29):

What If My Caretaker Is Not Available At The Drop-off Location?

If the passenger cannot be left unattended after exiting the vehicle and the caretaker is not at the drop-off location when the vehicle arrives, the passenger will remain on the vehicle and the vehicle will continue as scheduled. The operator will contact GCT Dispatch for assistance. GCT Dispatch will call the emergency contact number and provide the caretaker with the next safe drop-off location to meet the vehicle in-route. If the contact number is not answered or if the number is disconnected, DFCS/911 will be called to take custody of the passenger.

The first instance will be a written warning, the second instance within a 180 day period the passenger's service will be suspended for fourteen (14) calendar days. If this situation happens a third time within a 180 day period, the passenger's service will be suspended for thirty (30) calendar days. If this situation happens a fourth time within the 180 day period, the passenger's service will be suspended for sixty (60) calendar days. If the situation happens a fourth time, the caretaker will have to show cause why the service should not be permanently removed.

Failure of a caretaker to appear at the drop-off location to take custody of the rider is an operational issue that would be seriously disruptive to service, and therefore is an acceptable basis for the denial of service to the rider.

Corrective Action Schedule: Within 60 days of the issuance of the final report, GCT must revise its policies regarding suspension of a rider's service due to the behavior of his or her PCA or companion and submit documentation of updated public information.

Advisory Comment: It is an effective practice to prohibit similar behaviors and actions for paratransit riders as for fixed route riders.

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, two deficiencies were found with the requirement to train personnel to proficiency as appropriate to their duties and with how Gwinnett County communicates, manages and/or oversees training requirements with respect to staff and contractors. In addition, two advisory comments are offered regarding call-takers' knowing that riders may request trips up to three days in advance, and negotiating trip times.

The review team interviewed the contractor's safety supervisor to learn more about it trains its drivers. Monthly safety meetings and "safety blitzes" occur fleetwide for all drivers. The review team also determined that operators are aware of ADA policies and procedures as related to wheelchair lifts, service animals, portable oxygen and respirators, wheelchair use/operability, and denial of services. In the review team's interviews with six paratransit drivers, the team found that all drivers recalled having received supplemental training (not specific to paratransit) when new techniques were developed.

However, the interviews also found that none of the six drivers had an accurate understanding of GCT's pickup window of 0/+30-minutes. When asked about their understanding of an on-time pickup, drivers stated that they could arrive no more than 15 minutes before or 15 minutes after the requested pickup time. As noted earlier in this report, this incorrect understanding of the pickup window helps to explain the large proportion of early pickups: 48.3 percent in the review team's sample.

As noted in "Response Time" (Section 6.4), call-takers rarely negotiated trip times with riders, even if the paratransit software did not offer a solution to the rider's requested pickup time. It was not clear that the call-takers understood that the regulations allowed them to negotiate trip times. While not a compliance issue, this lack of negotiation may lead to schedules that are less efficient from an operations standpoint.

Also noted in the "Response Time" section, nearly all trip requests were for the next day. Call-takers seemed to believe that trips could only be requested for one day in advance (except for Monday trips). GCT should make sure that the call-takers understand that riders may request trips up to three days ahead.

As noted in "Written Eligibility Determinations" (Section 6.2), individuals who are determined to be conditionally eligible receive letters indicating that they are unconditionally eligible, with no explanation of the conditions under which they may use GCT paratransit service. Also noted in Section 6.2, all determination letters incorrectly state the period of eligibility as three years, rather than two years, and the period for filing an appeal as 30 days from the date of the letter, rather than 60 days. The letters also do not provide sufficient information about GCT's appeal process or how an individual may file an appeal.

Corrective Action Schedule: Within 60 days of the issuance of the final report, Gwinnett County Transit must provide evidence that it has trained drivers to understand the 30-minute pickup window, and that staff who are responsible for preparing eligibility determination letters have received training on the required content of those letters and correct information about GCT's recertification and appeal policies.

Advisory Comment: It is an effective practice for Gwinnett County Transit to direct its contractor to ensure that the call-takers know that riders may request trips up to three days in advance. It is also an effective practice for Gwinnett County Transit to direct its contractors to train its call-takers about negotiating requested pickup times.

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 arrangements 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.

GCT contracts with Transdev for the management and operation of the GCT fixed route and paratransit service in Gwinnett County.

The contract between the county and Transdev contains the requirement to meet all ADA requirements in the provision of paratransit service in Section 2.2.2 of Exhibit C, Scope of Services:

The Contractor shall operate complementary paratransit service in strict accordance with the Americans with Disabilities Act of 1990 (ADA). The Contractor shall be responsible for meeting all regulations as promulgated in DOT ADA regulations (49 CFR Part 37). The complementary paratransit service shall be operated in strict accordance with the established operating days and hours of the fixed route local bus service, or any revisions thereto.

Additional references to compliance with ADA requirements are included throughout the Scope of Services.

GCT's oversight of Transdev is split between staff in different departments. Staff meets every two weeks with the Transdev team; fixed route, paratransit, and commuter services are discussed at every meeting. Discussions cover operational data, safety issues and campaigns, rider complaints as logged in TransTrack, service changes, preparation for upcoming compliance reviews, and initiatives, projects, and aspects of service performance that are going well.

In addition, Transdev conducts internal paratransit audits to evaluate performance. As the result of a recent audit, the team decided to split the reservations and dispatching functions (rather than have call-takers/dispatchers perform both sets of duties) and relocate dedicated call-takers to the

county customer service center. Dedicated dispatchers will continue to work from the Transdev operations and maintenance facility.

6.11 Service Provided by Another Public Entity (if applicable)

Requirement: 49 CFR Part 37 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 section 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, the 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 GCT. GCT 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 GCT coordinates service with other fixed route operators with overlapping or contiguous service areas or jurisdictions. GCT coordinates its paratransit service with the Metropolitan Atlanta Rapid Transit Authority's (MARTA) ADA complementary paratransit service.

GCT's fixed route bus service area overlaps the fixed route service area of one agency: MARTA (in addition, GCT express routes not subject to the ADA complementary paratransit requirements travel to the MARTA service area). Four local GCT bus routes travel to MARTA's Doraville rail station. This is designated transfer point for GCT paratransit riders who want to transfer to "Mobility," MARTA's ADA paratransit service. GCT paratransit riders may also transfer to MARTA bus routes or rail service at Doraville station.

If a GCT riders wishes to transfer to Mobility service, the rider must coordinate that transfer. The Rider's Guide (page 17) states: "Customers are required to coordinate with MARTA Mobility on their own. You can call MARTA Mobility at 404-848-5000." The Rider's Guide (page 31) also states:

There are no free transfers between GCT ADA paratransit vehicles and MARTA Mobility (paratransit) vehicles. Passengers will be required to pay full fare for each interagency transfer boarding at the MARTA Doraville rail station.

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Summary Table of Compliance Review Findings

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding Deficiency/ No Deficiency or Advisory Comment	Finding(s) of Deficiency	Response Days/ Date*
1	Comparable complementary paratransit service	37.121	No deficiencies		
2	Absence of administrative burden	37.125 & 37.5	No deficiencies		
3	ADA paratransit eligibility standards	37.123(e) (1)-(3)	4 deficiencies 2 advisory comments (see report text)	Question about functions a PCA performs for an applicant must be removed from Part A of application Need for PCA to provide “transportation assistance” must be removed from Part A Question about functions a PCA performs must be removed from Part B of application Lift capacity is not correct in Part B of application	60 days
4	Accessible information	37.125(b)	No deficiencies		
5	Eligibility determinations within 21 days	37.125(c)	1 deficiency 1 advisory comment (see report text)	Procedures for implementing presumptive eligibility when determinations take longer than 21 days must be developed	60 days

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding Deficiency/ No Deficiency or Advisory Comment	Finding(s) of Deficiency	Response Days/ Date*
6	Written eligibility determinations including specific reasons for denials or temporary or conditional eligibility	37.125(d) (e)	5 deficiencies 2 advisory comments (see report text)	Letters to individuals with conditional eligibility must include a description of conditions Correct recertification period must be stated in letters Individuals must be able to file appeals in 60 days Appeals cannot be required to be filed in writing More information about the appeal process must be provided	60 days
7	Recertification of eligibility at reasonable intervals	35.125(f)	1 deficiency 1 advisory comment (see report text)	Form must not note that GCT may require use of a PCA	60 days
8	Administrative appeals process for denials and conditional eligibility	37.125(g)	3 deficiencies 1 advisory comment (see report text)	Applicants determined to be conditionally or temporarily eligible must have the right to appeal Appeal request may be required in writing, but not the basis or reasons for the appeal Presumptive eligibility must be granted if appeal decisions are not made within 30 days	60 days
9	Complementary paratransit for visitors	37.127	1 deficiency 2 advisory comments (see report text)	Service must be provided to visitors who do not have credentials from another paratransit system	60 days

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding Deficiency/ No Deficiency or Advisory Comment	Finding(s) of Deficiency	Response Days/ Date*
10	Types of service	37.129	No deficiencies		
11	Service area	37.131(a)	No deficiencies		
12	Response time	37.131(b)	No deficiencies 3 advisory comments (see report text)		
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	Paratransit service hours are shorter than the fixed route service hours, both weekdays and Saturday	60 days
16	Absence of capacity constraints	37.131(f)	See below		
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		

Item	Part 27 or 37 or 38 Requirement	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) 37.131(3)(1)(b)	1 deficiency	GCT's definition of missed trips omits occurrences when a vehicle arrives before or during the pickup window, the rider does not board, and the vehicle does not wait at least five minutes within the pickup window.	60 days
21	No substantial numbers of trips with excessive trip lengths	37.131(f) (3)(i)(c)	No deficiencies 1 advisory comment (see report text)		
22a	No operational patterns or practices significantly limiting service availability (telephone hold times)	37.131(f)	1 deficiency 2 advisory comments (see report text)	GCT is not monitoring telephone hold times. Its contractor is responsible for providing the telephone system, but the existing system did not have the ability to monitor performance.	60 days
22b	No operational patterns or practices significantly limiting service availability (untimely drop-offs)	37.131(f)	No deficiencies 2 advisory comments (see report text)		
23	Subscription Service	37.133	No deficiencies		
24	No-show, late cancellation and reasonable service suspension & appeal policies	37.125(h) (1)-(3)	1 deficiency	GCT's no-show policy relies on a simple percentage to establish a pattern or practice, failing to account for a rider's frequency of use.	60 days
25	Complaint Resolution & Compliance Information	27.13(a)(b) & 27.121	1 deficiency 1 advisory comment (see report text)	GCT does not designate an individual or job position to coordinate the complaint handling process	60 days

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding Deficiency/ No Deficiency or Advisory Comment	Finding(s) of Deficiency	Response Days/ Date*
26	Nondiscrimination	37.5	1 deficiency 1 advisory comment (see report text)	Suspensions of a rider's service may not be imposed due to behavior of a rider's PCA or companion	60 days
27	Training	37.173	2 deficiencies 2 advisory comments (see report text)	Drivers do not understand the 30-minute pickup window Staff who prepare eligibility determination letters need training about the required content of those letters	60 days
28	Service under contract with a private entity	37.23	No deficiencies		
29	Service provided by another public entity	37.21(b)	Not applicable		
30	Coordination of service	37.139(g)	No deficiencies		

Attachment A
FTA Notification Letter to Gwinnett County
Transit



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

Headquarters

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

November 7, 2019

Karen Winger
Division Director, Transit
Gwinnett County Department of Transportation
Gwinnett Justice & Administration Center
75 Langley Drive
Lawrenceville, GA 30046

Dear Ms. Winger:

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 Gwinnett County Department of Transportation (Gwinnett County Transit) has been selected for a review of its complementary paratransit service to take place February 4–7, 2020.

The purpose of this review will be to determine whether Gwinnett County Transit 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. on Tuesday, February 4, to introduce the Collaborative team and FTA representatives to Gwinnett County Transit. 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 Gwinnett County Transit'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 February 4, after the opening conference.

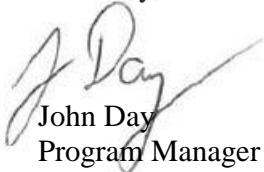
FTA requests your attendance at an exit conference scheduled for 2 p.m. on Friday, February 7. The exit conference will afford an opportunity for the reviewers to discuss their observations with you and your agency. We request that you or your designee, the paratransit service manager, the ADA coordinator, 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 Gwinnett County Transit, will be considered public documents subject to release under the Freedom of Information Act, upon request.

Gwinnett County Transit 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 Gwinnett County Transit staff.

Sincerely,



John Day
Program Manager

Enclosures (2)

cc: Yvette Taylor, Regional Administrator, FTA Region 4
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 30 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
Gwinnet County Transit Response Letter to Draft Report

From: Gagnard, Kirk [mailto:Kirk.Gagnard@gwinnettcountry.com]
Sent: Friday, March 05, 2021 5:04 PM
To: Day, John (FTA) <John.Day@dot.gov>
Cc: Tucker, David <David.Tucker@gwinnettcountry.com>; Winger, Karen <Karen.Winger@gwinnettcountry.com>
Subject: RE: Draft Report: Gwinnett County ADA Paratransit Review

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

John,

Good evening. I have attached our responses to the deficiencies identified in the ADA review. While we agree with the majority of the deficiencies there was only one that we had concerns about. The only deficiency that we disagree with is the entry in Section 15 (Hours and Days of Service). GCT operates paratransit service at the same hours that our local fixed route service is operated. I have included a screen shot of the Trapeze scheduling screen below identifying a potential 5:20AM paratransit trip to show that we are not restricted from scheduling trips at that time. We are also available to discuss any of the data for the later evening trips you might have questions about since we factor in travel time when scheduling late night trips.

Below are some minor grammatical corrections we saw that needed to be made in the text of the report.

- 1 Some of TOC entries reference the wrong pages (ie, pg 24 is Written Eligibility Determinations)
- 2 Page 14 Loammi Aviles works for GCT and not TransDev
- 3 Page 15 "Overhead" should be "overheard"
- 4 Page 29 Discussion section, 1st sentence delete "but"; 2nd sentence "comment" should be plural
- 5 Page 40 Advisory Comment section, "GCR" should be "GCT"

Trapeze Scheduling Screen

Wizard Edit View Map

Default Default

Abbr

MOT Client Day RE RT RL ST NT ET Location Run Viol Direct... nEG nED

P 03-03-2021 5:20 5:20 ASHFORD INDIAN TRAIL APARTMENT, 1100, INDIAN TRAIL 14.10 0 0
FRESENIUS DIALYSIS (OLD PEACHT, 185, OLD PEACHTREE 14.10 0 0

DropOff
Pickup

RE:
RT: 5:20
RL:

DEM-Demand

Escort
Taxi

Runs:

☐ Use Neg
☐ SearchW
☐ Common Runs

Apply To All

Destination
Origin

☒ Req
☒ Stop

MaxTransfer 0
MaxWalk

#	S...	Run	MOT	+SE	+ST	+SL	-ET	Trav	Dur...	Fare	Walk	Viol	Weight	Provider	Cost	OrderNo
1	1	111X	P	5:20	5:20	5:50	6:15	55		0.00		BT	251.78		0.00	
2	1	127A	P	5:20	5:20	5:50	6:15	55		0.00			537.75		0.00	
3	1	113P	P	5:20	5:20	5:50	6:12	52		0.00			855.32		0.00	
4	1	112P	P	5:20	5:20	5:50	6:03	38		0.00			1670.63		0.00	

Run	Act	ST	ET	Location	Viol	SchSt...	Sent ...	Rider ...	Map Page	Space Type	Dist
111X	Out	5:00	5:07	GWINNETT COUNTY TRANS, 2880, REMINGTON PARK CT, NORCROS		S		0			0.00
111X	P	5:20	5:20	ASHFORD INDIAN TRAIL APARTMENT, 1100, INDIAN TRAIL ...		U		4114		AM2	4.81
111X	P	5:30	5:47	980, WALTHER BLVD, LAWRENCEVILLE, GA		S		5359		AM3	12.31
111X	P	5:40	6:01	805, SENTRY RIDGE XING, SUWANEE, GA		S		5319		AM4	6.28
111X	D		6:15	FRESENIUS DIALYSIS (OLD PEACHT, 185, OLD PEACHTREE ... BT		U		4114		AM2	4.27
111X	D		6:16	FRESENIUS DIALYSIS (OLD PEACHT, 185, OLD PEACHTREE RD NW, S...		S		5359		AM1	0.00
111X	D		6:16	FRESENIUS DIALYSIS (OLD PEACHT, 185, OLD PEACHTREE RD NW, S...		S		5319			0.00
111X	P	8:30	8:30	2796, LAUREL VALLEY TRL, HUDSON, GA		S		4757		AM1	4.67
111X	D		8:45	BURNETTE ELEMENTARY SCHOOL, 3221, MCGINNIS FERRY RD, SUW...		S		4757			4.95
111X	P	10:30	10:30	FRESENIUS DIALYSIS (OLD PEACHT, 185, OLD PEACHTREE RD NW, S...		S		5319		AM1	1.12
111X	D		10:43	805, SENTRY RIDGE XING, SUWANEE, GA		S		5319			4.27
111X	P	11:20	11:20	FRESENIUS DIALYSIS (OLD PEACHT, 185, OLD PEACHTREE RD NW, S...		S		5359		AM1	4.27
111X	D		11:35	980, WALTHER BLVD, LAWRENCEVILLE, GA		S		5359			5.37
111X	In	13:00	11:55	GWINNETT COUNTY TRANS, 2880, REMINGTON PARK CT, NORCROS		S		0			9.75

We look forward to working with you to address any additional concerns you might have. I can say that personally I felt this review was extremely helpful in finding ways we can improve our service and I'm appreciative of the time you and your team spent to help us. I look forward to getting a corrective action plan in place that addresses all of these issues though we are already actively working to correct these.

Regards,

Kirk Gagnard | Transit Manager, Transit Division, Department of Transportation | Gwinnett County Government
770.822.7411 | 75 Langley Drive | Lawrenceville, GA 30046 | Kirk.Gagnard@gwinnettcounty.com

This email message and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. Please notify the sender immediately if you have received this email by mistake and delete this email from your system. If you are the intended recipient, please check this email and any attachments for the presence of viruses, as Gwinnett County accepts no liability for any damage caused by any virus transmitted by this email. In addition, emails sent or received by Gwinnett County employees are subject to the Georgia Open Records Act (hereinafter the "Act"). Unless otherwise exempted from the Act, senders and receivers of emails shall presume that the emails will be released upon request and are subject to state records retention requirements.

Attachment C
Gwinnet County Transit Paratransit Service Rider's Guide



GWINNETT COUNTY TRANSIT

Paratransit Service Rider's Guide

**GWINNETT COUNTY TRANSIT
Customer Service Center
3525 Mall Boulevard
Suite 5-C Duluth, GA 30096**

Phone: 770.822.5010

**Business Hours:
Mon- Fri, 8:00am – 5:00pm**

FREQUENTLY CALLED NUMBERS

Before calling for the services listed below, please read and become familiar with the applicable sections of this Rider's Guide for details on the service and when to call.

Call 770.418.2336 or TDD at 711 for:

- Make Trip Reservations
- Change a Scheduled Trip **(prior to the day of the trip)**
- Cancel a Scheduled Trip **(prior to the day of the trip)**

Call 770.246.4770 and “press 2” or TDD at 711 for:

- Same Day Cancel of a Trip
- Same Day Hold of a Trip
- Where's My Ride
- Request Help with Application
- Inquire about Service Status during Hazardous Weather and Emergency Events
- For Medical Offices and Similar Facilities to Notify GCT if Passenger's Appointment is Running Long

Call 770.822.5010 and “press 3” or TDD at 711 for:

- General GCT Paratransit Information
- Request GCT Paratransit Application
- Lost Breeze Paratransit Photo ID Card
- Lost Personal Property and Items
- Comments, Suggestions and Complaints

This Rider's Guide is available in Alternate Formats and/ or Languages

For persons with visual impairments, the Gwinnett County Transit (GCT) Paratransit Service Rider's Guide and application can be made available in alternate formats upon request.

For persons with Limited English Proficiency (LEP), the GCT Paratransit Service Rider's Guide and application is translated and available in Spanish, Korean, Vietnamese, and Chinese. These four languages have been identified as together comprising more than 80 percent of the LEP population in the GCT service area.

Based on limited encounters with other languages besides Spanish, the Language Line Services will be used to initiate communication with any LEP population group as needed and provide interpretation and translation services as requested by LEP customers. Gwinnett County Transit will communicate with the LEP person any written notices of rights and notices of denials, losses, or decreases in benefits or services related to vital documents in the LEP person's language.

In addition, GCT will provide oral or written notice in the LEP person's language of the right to receive language assistance to access GCT services and documents, free of cost.

To obtain the Rider's Guide and application in an alternate format and/ or language, please call GCT at 770.822.5010 and "press 3" during normal business hours, 8:00am to 5:00pm, Monday through Friday.

For persons who have difficulty using a standard phone including people who are deaf, hard of hearing, deaf-blind or speech disabled, please call Georgia Relay at 711 to set up this free TDD relay public service to connect and communicate with GCT through a variety of Traditional Relay and Captioned Telephone services.

Notice to the Public of Rights under Title VI Gwinnett County Transit (GCT)

Gwinnett County Transit (GCT) operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been subjected to any unlawful discriminatory practice under Title VI may file a complaint with Gwinnett County, Georgia.

For more information on GCT's civil rights program, and the procedures to file a complaint, please visit the GCT website www.gctransit.com or contact customer service at 770.822.5010. If you have trouble using a standard telephone and need TTY/TTD services, dial 7-1-1 to set up Georgia Relay communications; language assistance is available for persons with limited English proficiency.

A person may also file a Title VI complaint directly with the Federal Transit Administration, Office of Civil Rights, and 1200 New Jersey Avenue SE, Washington, D.C. 20590. Please visit this webpage: http://www.fta.dot.gov/civilrights/12328_5104.html for information on filing and a Federal Transit Administration complaint form.

Translation of Notice to the Public of Rights under Title VI is provided on the GCT website at www.gctransit.com for Spanish, Korean, Vietnamese and Chinese. For other language assistance, please call 770.822.5010 to speak with an interpreter. You have the right to receive language assistance to access GCT services and documents, free of cost.

La traducción del Aviso para el público sobre los derechos en virtud del Título VI se proporciona en el sitio web de GCT en www.gctransit.com para español, coreano, vietnamita y chino. Para obtener asistencia en otro idioma, llame al 770.822.5010 para hablar con un intérprete. Tiene derecho a recibir asistencia con el idioma para acceder a los servicios y documentos de GCT, sin costo.

Title VI의 권리에 대한 알림의 스페인어, 한국어, 베트남어 및 중국어 번역본은 GCT 웹사이트 www.gctransit.com 에서 제공됩니다. 다른 언어 지원에 대해서는 770.822.5010으로 전화하여 통역사와 상담해 주십시오. 귀하에게는 GCT 서비스 및 문서 이용을 위해 언어 지원을 무료로 받으실 권리가 있습니다.

GCT 網站 www.gctransit.com 為 Title VI

權利公告提供西班牙語、韓語、越南語和中文翻譯服務。如果需要其他語言協助，請致電 770.822.5010 與翻譯員交談。您有權免費獲得語言協助以使用 GCT 服務及檔。

Bản dịch bằng tiếng Tây Ban Nha, Hàn Quốc, Việt Nam và Trung Quốc được cung cấp trên trang web GC T www.gctransit.com. Để được hỗ trợ ngôn ngữ khác, vui lòng gọi điện đến số 770.822.5010 để nói chuyện với thông dịch viên. Quý khách có quyền nhận được sự hỗ trợ ngôn ngữ miễn phí để tiếp cận các tài liệu và dịch vụ của GCT.

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GENERAL INFORMATION & PROGRAM ELIGIBILITY

Welcome to Gwinnett County Transit

The information contained in this Gwinnett County Paratransit Service Rider's Guide has been developed to help new and existing customers become acquainted with the Gwinnett Paratransit Service system and to provide the necessary guidelines required to use it effectively.

This document can be available in alternative formats upon request. If you have questions about any of the information contained in the guide and/or need to request the guide in alternate format, contact Gwinnett County Customer Service 770.822.5010.

What is Gwinnett County Paratransit Services?

Gwinnett County Paratransit Services is part of the comprehensive public transportation system of Gwinnett County. It is neither a personal taxi nor a social service agency. It is a **shared-ride public transportation** service of Gwinnett County in compliance with the complementary paratransit services provisions of the Americans with Disabilities Act of 1990 (ADA) and the final rule for 49 CFR Parts 27, 37, and 38 issued by the U.S. Department of Transportation (DOT) in the 9/6/1991 Federal Register. Gwinnett County Transit (GCT) operates a curb-to-curb, with door to door service upon request. The definition of curb-to-curb service is the customer will be picked up at the closest curb to the pick-up location and will be taken to the closest curb of the drop-off location.

Transportation is provided within a $\frac{3}{4}$ mile corridor on either side of the existing local fixed route services in Gwinnett County. This service can be used for work, school, shopping, recreation, medical appointments, etc. Gwinnett County Paratransit Service provides transportation that is comparable to the fixed route system in the area, service times, and travel times.

Customers must be aware, this is a shared-ride service, duration of a trip maybe as long as a comparable fixed route bus trip plus one-half (1/2) hour for travel and wait time.

The Gwinnett County Transit Reservationist will coordinate transfers to MARTA Mobility when a trip requires this level of scheduling.

Who Is Eligible?

The Americans with Disabilities Act (ADA) is a civil rights statute. As a civil rights law, the ADA clearly emphasizes nondiscriminatory access to fixed route service, with complementary paratransit acting as a "safety net" for people who do not have the functional ability to use the fixed route system. Under the ADA, complementary

paratransit service is not intended to be a comprehensive system of transportation for individuals with disabilities, and simply having a disability or multiple disabilities does not, in and of itself, entitle a person to ride.

49 CFR Part 37 Section 37.123 defines the standards and sets forth the minimum requirements for eligibility for complementary paratransit service. The law recognizes that ‘a person may be eligible for some trips but not others’ since ‘eligibility does not inhere to the individual or his or her disability, as such, but in meeting the functional criteria of inability to use the fixed route system established by the ADA.’ This is known as trip by trip eligibility. The DOT ADA regulations provide for three categories of ADA Complementary Paratransit Eligibility.

Eligibility Category 1- Inability to Navigate System Independently The first category of eligibility includes those persons who are unable to fully use the accessible fixed route bus services. Included in this category is:

“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” [Section 37.123(e)(1)]

This applies to an individual who cannot independently board, ride, or disembark from the fixed route bus system.

Eligibility Category 2-Lack of Accessible Vehicles, Stations, or Bus Stops This second category of eligibility applies to persons who could use accessible fixed route transportation services if it were available. Included in this category is:

“Any individual with a disability who needs the assistance of a wheelchair lift or other boarding assistance device and is able, with such assistance, to board, ride and disembark from any vehicle which is readily accessible to and usable by individuals with disabilities if the individual wants to travel on a route on the system during the hours of operation of the system at a time, or within a reasonable period of such time, when such a vehicle is not being used to provide designated public transportation on the route.” [Section 37.123(e)(2)]

In the context of the GCT vehicles, this category does not apply to GCT service as all GCT vehicles in fixed route service are accessible. However, it is important to remember that eligibility for complementary paratransit service under Category 2 is ‘route based, not system based’ and in those instances where ‘the lift (or ramp) on a vehicle cannot be deployed at a particular bus stop, an individual is eligible for paratransit under this category with respect to the service to the inaccessible stop.’

Eligibility Category 3- Inability to Reach a Boarding Point or Final Destination- This third category of eligibility includes:

“Any individual with a disability who has a specific impairment-related condition which prevents such individual from traveling to a boarding location or from a disembarking location on such system.” [Section 37.123(e)(3)]

This applies to an individual who, because of his/her disability, cannot access a bus stop to board the fixed route bus and cannot access his/her final destination after disembarking from a fixed route bus. Eligibility is determined each time the eligible passenger calls. Two important qualifiers to this category are included in the regulations. First, environmental conditions and architectural barriers not under the control of the public entity do not, when considered alone, confer eligibility. Second, inconvenience in using the fixed route bus system is not a basis for eligibility.

Of critical importance when making determinations is ‘the interaction between an impairment-related condition and the environmental barrier...’ While the USDOT acknowledged that ‘some judgment is required to distinguish between situations in which travel is prevented and situations in which it is merely made more difficult’, it was quick to point out that ‘if an impairment-related condition only makes the job of accessing transit more difficult than it might otherwise be, but does not prevent the travel, then the person is not eligible.’

The determining factor in deciding whether the individual qualifies for ADA complementary paratransit is whether the individual can functionally ride or access the bus. It is not a medical determination; it is a functional ability analysis.

Individuals who believe they are eligible must apply for certification. A licensed/certified Healthcare Professional must certify your eligibility application. GCT reserves the right to make all final eligibility determinations.

Eligibility is valid for three (3) years unless temporary eligibility is given. Temporary eligibility is based on a temporary functional need.

Reasonable Modification

The County shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability or to provide transit service accessibility. GCT will make every attempt to provide transportation services that meet our customer needs as long as the request:

- Does not fundamentally alter the service
- Does not create a direct threat to the health and safety of others and;
- Is not necessary to permit the passenger to use the services for their intended purpose.

Types of Eligibility

GCT in accordance with federal ADA requirements has the authority to grant eligibility for use of paratransit services as follows:

Unconditional Eligibility

Unconditional eligibility will be granted to an individual who is unable to use fixed route transit services under any circumstances and is thus eligible to make all trips using complementary paratransit. Examples of applicants granted unconditional eligibility include:

- Individuals who cannot travel independently due to severe or profound intellectual disabilities or advanced dementia
- Individuals with physical disabilities who have limited functional ability (e.g., riders who use a manual wheelchair and who cannot sufficiently propel themselves)
- Individuals who have lost vision late in life and have not learned to travel independently in the community

Conditional Eligibility

Conditional eligibility may be granted to an individual who is able to use fixed route transit services for some trips but not others. Conditional ADA paratransit eligibility will be for those trips for which he or she meets the criteria. An individual's conditional eligibility will be processed based on factors that are specific, measurable and thorough. Examples of individuals who might be candidates for this type of eligibility:

- Individuals with intellectual disabilities who have learned how to make certain trips on fixed routes but cannot make all trips independently – They would not be eligible for the trips they have learned to take by fixed route, but would be eligible for all other trips.
- Individuals with physical disabilities who can reach a bus stop or rail station within four blocks when the route is accessible – An appropriate condition on eligibility in this instance is “when the distance to or from stops and stations is more than four blocks or when the route to stops and stations is inaccessible.”
- Individuals with health conditions who can get to and from stops and stations when the temperature is not too hot (e.g., less than 80°F) or the distance is not too far (e.g., closer than four blocks) – They would be ADA paratransit eligible when the temperature exceeds 80°F or the stop or station is more than four blocks away

Temporary Eligibility

Temporary eligibility may be granted to an individual whose health condition or disability is expected to change in the short term or whose mobility device will soon change. Temporary eligibility can be either unconditional or conditional, depending on the individual's functional ability. For example, an individual may need to undergo two months of treatment for a health condition, resulting in severe fatigue

that prevents him or her from using fixed route service. This individual would be ADA paratransit eligible for the duration of the treatment period.

Using the Fixed Route Service

Passengers can use the fixed route system and flash their GCT Paratransit ID to qualify for cash half fare. If a passenger would like to take advantage of the FREE transfer to MARTA, they would need to apply for a GCT Half Fare Breeze Card. If the passenger's Paratransit eligibility allows for a PCA, your Personal Care Attendant (PCA) can ride for free taking advantage of the flexibility and independence providing by our fixed route system. To plan your public transit trip call 770-822-5010 and a customer service agent will help you identify the best route to reach your destination.

Half Fare

Half Fare application can be found on the gctransit.com website, if a customer needs assistance filling out the application they can call 770-822-5010 or visit the customer service office in person. The GCT Half-Fare Breeze card allows the passenger to take advantage of the Free Transfer from GCT to MARTA.

However, in order to make the return trip from MARTA, the customer would also need to hold a MARTA Half Fare Breeze Card. Half Fare Breeze Card application for MARTA can be found at www.itsmarta.com and can be obtained at the MARTA ride stores.

To plan your public transit trip call 770-822-5010 and a customer service agent will help you identify the best route to reach your destination.

Travel Training

Gwinnett County Transit is committed to training and enabling disabled customers to use the fixed route system as a way of increasing their independence and ability to travel to all areas served by public transportation. Any individual and/or group interested in participating in a free training seminar can arrange it by calling Customer Service at 770-822-5010

What Areas Are Served?

The GCT paratransit service operates three-fourths ($\frac{3}{4}$) of a mile on either side of each local bus route in Gwinnett County. In addition to the core service area, Gwinnett County has designated additional corridors for GCT paratransit service with widths of three-fourths ($\frac{3}{4}$) of a mile on each side of local fixed route segments previously operated by GCT. The service area is within Gwinnett County only, except for including the MARTA Doraville rail station intermodal area as a stop to facilitate interagency transfers.

Eligible complementary paratransit passengers are not required to live inside the service area; however, all passenger trips must begin and end within the GCT paratransit service area, and passengers must board and disembark the paratransit

vehicle inside of the service area at a safe transfer location. Transfer points will be established with passengers traveling outside the service area.

A map of the GCT complementary paratransit service area can be viewed, downloaded, or printed using the GCT web page, www.gctransit.com. On the left side of the page click on the 'Paratransit Information' link, and then click on the 'Paratransit Service Map' link. The GCT complementary paratransit service area is denoted on the map as 'ADA Paratransit Buffer.'

When Does The Service Operate?

GCT complementary paratransit services are provided on Monday through Saturday. The service hours are the same hours as the local fixed route bus service.

Sunday service is not available. Service is not available in observance of the following holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

APPLICATION GUIDELINES

How Do I Apply For Service?

Step 1 -- Get the GCT application for paratransit eligibility.

The GCT application can be viewed, downloaded, or printed using the GCT web page, www.gctransit.com. On the left side of the page click on the 'Paratransit Information' link, and then click on the 'Paratransit Application' link.

Also and interested customer can request an application and have it mailed to you. To request an application, please call GCT at 770.822.5010 and "press 3" during normal business hours, 8:00am to 5:00pm, Monday through Friday. For persons who have difficulty using a standard phone including people who are deaf, hard of hearing, deaf-blind or speech disabled, please call Georgia Relay at **711** to set up this free TDD relay public service to connect and communicate with GCT through a variety of Traditional Relay and Captioned Telephone services.

Also, the GCT application can be viewed, downloaded, or printed using the GCT web page, www.gctransit.com. On the left side of the page click on the 'Paratransit Information' link, and then click on the 'Paratransit Application' link.

Applications in alternate formats and/ or languages are available on request. Refer to page ii.

Step 2 -- Complete the application form and return it to GCT.

Complete the application form (called Part A) and return to GCT. All Part A questions must be answered completely by the applicant, or a representative or legal guardian who is familiar with the applicant's disability and his/her ability to travel on a bus. On the page titled, PATIENT CONSENT TO RELEASE & DISCLOSURE OF MEDICAL INFORMATION, the name, address, and telephone number of the licensed/certified Healthcare Professional who will certify Part B of the application must be provided. A signature on this page serves as the applicant's authorization allowing the licensed/certified Healthcare Professional to release medical information and allowing GCT to process the application. **This page must be completed and signed by all applicants.** An authorization not properly signed will be returned to the applicant and will render the application incomplete.

If an applicant needs help in filling out the application, contact GCT at 770.822.5010 and "press 3" or TDD at 711 and special arrangements can be made to assist in completing the application.

Mail completed Part A application including all required signatures to the following address:

Gwinnett County Transit
Re: Paratransit Application Part A
3525 Mall Boulevard, Suite 5-C Duluth, GA 30096

Step 3 -- GCT will request Part B information from the licensed/certified Healthcare Professional and proceed to determine the applicant's eligibility

Upon receipt of the completed Part A application with the signed authorization, the GCT paratransit agents will forward a Request for Medical Information to the Health Care Professional.

Part B of the application may only be completed by the applicant's Health Care Professional (Certifier). The Health Care Professional must be a licensed or certified professional who is qualified to assess the applicant's disability and his/her functional ability to travel on public transit. When Part B is completed and returned to GCT by the Health Care Professional, the application will be processed.

How Will I Know If I Can Use The Paratransit Service?

GCT must process a completed application within twenty-one (21) calendar days of receipt. An application is considered complete when both Part A and Part B have been received in the GCT office. Incomplete documents will be returned to the applicant or Health Care Professional for completion. If there is no response, the applicant's file will be closed out after one month. To be reopened upon the applicant's request. **The twenty-one (21) calendar day processing requirement will not apply to incomplete applications.**

You may be asked to attend an in-person interview. In some cases, you may be asked for additional information before you can be approved. Most applicants will be notified of their eligibility status without an interview. If the determination process is not completed within twenty-one (21) days per ADA requirements, the applicant is presumed to be eligible and may use the complementary paratransit service until a decision is made.

Notification of Applicant's Status

The applicant will be notified in writing, or alternate formats and/ or languages if requested, about his/her eligibility. If approved, the applicant will be instructed as to how to obtain a GCT ADA paratransit photo identification card.

GCT Breeze ADA paratransit photo identification card

The GCT Breeze ADA paratransit photo identification (ID) card is used to show proof of your eligibility to ride GCT complementary paratransit. **You must have your GCT Breeze ADA paratransit photo ID card present each time you ride.** The GCT Breeze ADA paratransit photo ID card is accepted at other transit agencies across the United States. Confirm exact scheduling rules and regulations with local transit authorities.

What if my Card is Lost or Stolen Card

If you lose or misplace your GCT Breeze ADA paratransit photo ID card, a replacement can be obtained for a fee of \$5.00 at the GCT offices at 3525 Mall Boulevard, Suite 5-C, Duluth, GA 30096. Contact Customer Service at 770.822.5010 and “press 2” or TDD at 711 for questions about a GCT Breeze ADA paratransit photo ID card. **Trips cannot be taken without showing a valid GCT Breeze ADA paratransit photo ID card.**

What If My Application Is Denied

If an applicant is denied eligibility, the applicant may appeal the decision either in writing or be heard in person. Appeals must be filed in writing within sixty (60) calendar days from the date of the notification letter to the applicant denying eligibility.

Mail the Letter of Appeal to:

Gwinnett County Transit

Re: Eligibility Appeal

3525 Mall Boulevard, Suite 5-C Duluth, GA 30096

Upon receipt of your letter of appeal, GCT will notify you of the location and time of the appeals hearing to be conducted within thirty (30) days. Applicants will have the opportunity to appear before an Appeals Committee. The applicant must provide his/her own transportation to the appeals hearing.

The Appeals Committee is a three (3) person board consisting of individuals not involved in the original eligibility determination. You will have the opportunity to be represented at the hearing and you may present information and arguments.

Within thirty (30) days of the hearing, applicants will be notified in writing of the Appeals Committee’s decision by mail. The decision of the Appeals Committee will be final.

How Long Is My Certification Valid

All paratransit passengers are required to be recertified every two (2) years. An application will be mailed three (3) months prior to expiration, along with an enclosed letter notifying the passenger that their certification for passenger service is up for renewal. Failure to return the application in a timely manner may result in a loss of service.

What if my Recertification Application is Denied

If the application for recertification is denied, the passenger may continue to use the service for sixty (60) calendar days from the date of the notification letter. If the passenger does not file an appeal within the sixty (60) calendar days, the passenger’s service will be discontinued on the 61st calendar day.

If the passenger does file an appeal within those sixty (60) calendar days, service will be continued until the Appeals Committee determines the passenger's eligibility. The passenger will receive written notification of the Appeals Committee's decision within thirty (30) days. If the passenger's application is denied, service will be discontinued ten (10) business days from the date of the notification letter.

What if I have a Temporary Disability

If a passenger has a temporary disability, he/she may obtain GCT ADA paratransit eligibility and a GCT ADA paratransit photo identification card valid for the expected duration of the disability. If the disability continues beyond the certified time, GCT will require a revised certification from the passenger's Health Care Professional.

SCHEDULING/RESERVING A TRIP

How Do I Reserve a Trip

Reservations can be made by calling GCT at 770.418.2336 and “press 3” or TDD at 711.

GCT operates an advanced reservation service for all paratransit trips. Reservations may be made by calling and speaking with a representative or by leaving a voicemail message up to three (3) days before a trip is required.

Representatives are available during our normal business hours from Monday through Friday for trip reservations. Trip reservations for Monday service may be requested via voicemail on Saturdays and Sundays. Next day reservations are available however same day reservations are not available.

There are no daily limits on the number of reservations the passenger can request. When making a reservation for a round trip, please allow at least two (2) hours between the requested pick-up times.

Every effort will be made to accommodate your requested pick-up time. However, passenger trip demand at certain times of the day may require that the passenger adjust their desired time by up to one (1) hour before or one (1) hour after the desired pick-up or drop-off time. Reservation space is assigned on a first-come, first-served basis. Please make sure to allow ample time for traffic or any other delays associated with transit when planning your trip.

Customers must be aware; this is a shared-ride service. The duration of a trip may be as long as a comparable fixed route trip plus one-half (1/2) for travel and wait time.

GCT paratransit service does not provide emergency or same day transportation. In addition, GCT paratransit service does not alter same day trip times or locations.

Whenever the passenger makes a reservation for a trip, the passenger must be prepared to give the reservation agent the following information:

- Your first and last name.
- Exact address of pick-up location, including an apartment number if appropriate.
- Exact address of the destination or drop-off location. Without an exact address a trip cannot be scheduled.
- The designated ADA accessible entrance location of the facility.
- Requested pick-up time (or appointment time) and return time.
- Notification whether a Personal Care Attendant, companion, child, and/ or service animal is traveling with the passenger.

- Whether wheelchair or other mobility device will be used.
- Need for door to door service.

The reservation agents are required to ask for complete information and will repeat the information back to you to make sure everything is correct. A paratransit vehicle driver or passenger cannot change the location of the pick-up or drop-off location on the day of the trip.

Customers are required to coordinate with MARTA mobility on their own. You can call MARTA Mobility at 404-848-5000

Requesting a Pick-up Time

You may request a pick up for anytime during operating hours. If your requested pick-up time is not available, the reservation agent may offer a pick-up time within one (1) hour before or one (1) hour after your requested pick-up time.

If you have to be at a specific location “no later” than a certain time, tell the reservation agent the time you must be there and let them tell you what time you need to be picked up.

Remember GCT’s paratransit service is a shared ride service and you may need to ride with other passengers. If you do not want the reservation agent to estimate an appropriate pick-up time, then plan to allow enough time so that you can arrive on time.

As with most paratransit systems, GCT uses a thirty (30) minute pick-up “window.” This means the vehicle can arrive up to thirty (30) minutes after the designated pick-up time and still be considered on time. Please keep the pick-up window in mind when making reservations, particularly when requesting a specific pick-up time.

Negotiating Pick-up or Drop-off Time

Customers may be asked to adjust their requested pick-up or drop-off times due to demand at certain times of the day. See examples below.

The “latest arrival” time means that the passenger has to be at their destination at a specific time (for example, Medical/Dental appointments, and start time for work/school).

The one-hour negotiating window should be used on the early side to ensure that the customer arrives on time.

Example1: Customer must arrive at doctor/work/school no later than 8:00 AM

- The reservation agent must evaluate travel time and 30 minute window when assigning the pick-up time. (example travel time 1 hour plus ½ hour window, total 1 ½ hours)

- The customer may be offered a time before 6:30 AM but not later. A pickup time of 6:15AM would be reasonable while a 6:45 AM may not be reasonable in ensuring he/she arrives on time at the destination.

The “earliest departure” time is the earliest time the passenger wants to be picked up (for example, getting off work or leaving school)

The one-hour negotiation window should be used on the late side because the customer cannot leave before the stated time.

Example 2: The customer ends work/school at 4:00 PM

- The reservation agent must take into account that the customer will not be ready until after 4:00 PM
- The customer may be offered a time after their 4:00 PM and time but not earlier. A pick-up time of 4:15 would not be reasonable while a 3:45PM would not be reasonable since they cannot leave work or school early. .

The one-hour negotiation window should be used on the late side because the customer cannot leave before the stated time.

When no travel restrictions apply (no exact arrival or departure time)

The one-hour negotiating window can be used on either side of the requested time since the customer is not constrained by appointments and/or work school schedule.

Changing a Scheduled Trip

If you have scheduled a trip and your plans and/or travel times change, call GCT at 770.822.5010 and “press 3” or TDD at 711 at least one (1) day before your trip. Tell the reservation agent that you would like to change a trip that has already been scheduled, and the reservation will ask you:

- Your first and last name.
- The date and time of the trip you are calling to change.
- The new times you would like to schedule or the changes you would like to make,

The reservation agent will always try to fulfill your needs, but changes to your original trip request may result in adjustments to your pick-up times.

GCT Paratransit is unable to change pick-up times or pick-up/ drop- off locations on the same day of your ride due to scheduling constraints with equipment and other passengers.

Reservation Confirmation

Customers will be given their schedule pick-up time at the end of their reservation process. A confirmation call will be made by a GCT to the customer between 4:00

PM and 8:00 PM for the reservation the following day. Reservation changes will only be accepted Sunday through Friday from 8:00 AM to 5:00 PM up to the day before the customer's schedule trip.

Where's My Ride

Customers can also sign up for a free service that will provide them text alerts of their schedule. Text Alerts include:

- When your vehicle is approaching
- When your vehicle has arrived
- When your vehicle is running late
- Your schedule the night before

Customers can customize the types of notices they receive by visiting www.transitoms.com/vision2/passenger_alert.aspx by selecting Gwinnett County Transit.

Customers will need to contact Paratransit Dispatch 770-246-4770 to receive their Client ID number for signup.

Subscription Service (Standing Orders)

If you need a ride to the **same place**, at the **same time**, and **at least three (3) days per week**, "Subscription Service" may be a good option for you. This service allows you to schedule these recurring trips with one call. You will then automatically be placed on the schedule each week. **Ask the reservation agent about this option.**

All subscription trips are pre-cancelled on the specified GCT service holidays.

For passengers who are receiving Subscription Service and if you do not need a ride on a particular day, it is very important to call GCT Paratransit one (1) day prior to cancel the trip. This will help us avoid unnecessary trips or missed connections. And you avoid a no-show on your passenger record. A subscription passenger that is suspended due to no-show violations will lose their current subscription status and may reapply after the suspension is completed.

You can put your subscription trip on "hold" for up to three (3) months. Then, when you are ready to have your Subscription Service taken off hold, call GCT Paratransit seven (7) days in advance to reinstate the subscription. If you need to put your subscription trip on hold for a longer period than three (3) months, we may ask you to call back and request a new Subscription Service at the time it is again needed.

If a passenger chooses to change the subscription time, it will be handled as a new subscription request. If a corresponding time slot is available, then the passenger's new subscription will take effect on the date requested by the passenger. If no corresponding time slot is available, the passenger may place his/her name on the subscription waiting list. Subscriptions will be assigned as

space becomes available.

The passenger may temporarily change the destination or pick-up address on a subscription per year for a minimum of two weeks if the time slot is available. All changes to subscriptions must be made at least one day in advance. Same day address changes cannot be accommodated. If the passenger chooses to change the subscription permanently, it will be handled as a new subscription request and placed on the waiting list if the time slot is not available.

As traffic patterns and demographics change, GCT Paratransit reserves the right to make reasonable adjustments to existing subscriptions. Should a passenger's subscription need to be adjusted, these changes will be made on an individual basis with input from the passenger and/or his/her guardian/caretaker. At no time will GCT adjust or change a passenger's subscription without consulting with the passenger. If an agreement cannot be reached between GCT and the passenger, it may result in the passenger's subscription being dropped from the subscription list and placed back on the request list until an appropriate time slot can be found. These changes will allow GCT to make the best use of its resources while providing the timeliest service possible to all of its passengers.

Under the Americans with Disabilities Act, which states that not more than 50% of the rides at any hour of any day may be subscription rides, total subscription trips may not exceed fifty (50) percent of space availability at any time during the day. Certain time periods may not have subscription time slots available. If the current subscription service trips exceeds the 50% threshold, GCT will start a wait list for customers interested in signing up for subscription trips.

How Do I Cancel A Trip Reservation?

To cancel a reservation **prior** to the day of the trip, please contact the GCT paratransit reservation agent at 770.822.5010 and "press 3" or TDD at 711, Sunday through Friday, 8:00am until 5:00pm. Please note: **Do not call reservations for same day reservation cancellations.** Any **same day** cancellations must be made by calling the GCT Control Center Hotline at 770.246.4770 and "press 2" or TDD at 711.

Be sure to give the passenger's name, address, date of travel, scheduled pick-up time and return trip information. Cancelling a reservation in a timely manner helps to keep the service operating on schedule and prevents the possibility of the passenger being charged for a "no show" for a trip not taken.

Any cancellation less than one (1) hour before the scheduled pick up time will be considered a no-show and a violation notification will be mailed to the passenger.

A passenger that shows a pattern or practice of cancelling five (5) same- day trips within thirty (30) calendar days of the first infraction, regardless of whether they were

cancelled prior to one (1) hour of the trip, will be penalized with one no-show violation; this includes cancelling multiple trips on the same day. On the fifth (5th) cancellation, a no-show will be recorded. Depending on the number of no-shows already on the passenger's record, a notification letter, warning letter, or suspension letter will be sent to the passenger. As with all no-shows, the passenger may appeal to the Appeals Committee and provide documentation of any extenuating circumstances for consideration.

Same-Day Hold

A same-day hold occurs when a passenger calls and indicates he/she is not ready to be picked up and requests that the trip be placed on hold. The passenger then calls back to notify dispatch of the time he/she would like the bus to arrive. **This is a same day reservation, and same day reservations are not permitted.**

However, because some delays are beyond the control of the passenger, calling for a same-day hold is permitted only under the following circumstances:

- Return trips from medical facilities, or governmental offices; or
- Return trips if GCT arrived at the passenger's destination after the scheduled arrival time.

Passengers must call prior to one (1) hour before their scheduled pick up time to place the trip on hold by calling the GCT Control Center Hotline at 770.246.4770 and "press 2" or TDD at 711. Calling for a same-day hold less than one (1) prior to pick-up will be considered a no-show. Please note that a bus will be sent back when a bus is available. A same-day hold pickup cannot interfere with another passenger's trips; therefore, a passenger may have to wait for an extended period of time to be picked up.

How Do I Ride The GCT Paratransit Service?

Pick Up Times

The scheduled pick-up time will be based upon the preference set by the passenger. Passengers can either schedule their pick-up time based on the time they need to be dropped off for an appointment or the time they wish to be picked up. At times, the GCT vehicle may arrive early. You can board the vehicle early if you want; however, you are not required to board the vehicle before the schedule pick-up time.

- If you must be at the doctors, school, work, etc. at 9:00 AM, please make sure you use this time to determine an appropriate pick-up time that will get you to your destination on time.
- If you end work at 4:00 PM, use this time to determine an appropriate pick up time that enables you to meet the vehicle within five (5) minutes of its arrival at your work site.

Pick Up Window

A pick-up time will be based upon appointment times. **A pick-up window of thirty (30) minutes allows GCT to arrive at the passenger's location up to thirty (30) minutes after the scheduled pick-up time.** The thirty (30) minute pick-up window assists GCT in accommodating as many passengers as possible during a particular time period. If the paratransit vehicle has not arrived by the end of the thirty (30) minute period, please contact GCT by calling the GCT Control Center Hotline at 770.246.4770 and "press 2" or TDD at 711 to check the status of your pick-up.

GCT recommends that you allow enough time to arrive at your destination before your appointment. The GCT paratransit service is curb-to-curb (you may request door to door service with some restrictions) and you will need to travel from the curb to your final destination. This is especially important if you are traveling within a complex of buildings.

In order to maintain service efficiency, GCT paratransit vehicle drivers do not make side stops on the way to your destination. Please schedule all times and locations when you make your reservation.

Gated Communities

Those passengers that reside or travel to or from a gated community should remain in the dwelling until the vehicle has arrived at the gate. The passenger will be notified that the vehicle has arrived at the gate. If the gate buzzer does not work, the driver will call the GCT Control Center and the GCT Control Center will notify the passenger to open the gate.

Boarding the Paratransit Vehicle

Passengers must have their GCT ADA paratransit photo identification card and paratransit fare ready to present to the paratransit vehicle driver when boarding the vehicle. Failure to provide fare in either the form of GCT paper paratransit ticket, Breeze GCT electronic paratransit ticket, or exact cash fare (drivers do not make change) at the time of boarding will result in the disruption of a passenger's service and a no-show will be added to the passenger's record.

Driver Assistance

Drivers will provide assistance to passengers on and off the bus. The driver will provide assistance with the use of lifts, ramps, and securement devices. The driver will assist in pushing a manual wheelchair up the ramp or onto the lift of the bus. Drivers do not assist passengers with packages.

GCT operates a curb-to-curb service (and extends farther upon request). The drivers will assist on and off the vehicle from the curb of the address. If assistance is needed beyond the curb due to disability, make this known to the reservation agent at the time of scheduling the trip.

Driver Wait Time

It is important to be at the designated pick-up location at the scheduled pick-up

time indicated by the reservation agent when passengers made their reservation. The vehicle **will wait up until five (5) minutes** past the scheduled pick-up time for a passenger to arrive at the curb or designated pick-up point. If the vehicle arrives after the scheduled pick-up time, the driver is instructed to wait five (5) minutes and to contact the GCT Control

The vehicle is not permitted to wait while the passenger conducts business at their destination. The passenger will need to make a reservation for their return trip for a designated pick-up time. Pick-up time and driver wait time requirements also will apply to the return trip.

Closed Business or Facility

If a business or facility is closed upon the arrival of the vehicle, the passenger can choose to stay on the vehicle and be dropped off at the return address at the convenience of GCT (return trip fare must be paid), or the passenger can get off the paratransit vehicle and wait for the return trip paratransit vehicle to pick them up.

Early or Late Pick-up Requests

GCT is not obligated to comply with a change for an early or late pick-up on the day of the scheduled trip. GCT will try and accommodate an early or late pick-up request on the day of the scheduled trip; however, other scheduled trips cannot be disrupted. Drivers are not allowed to start earlier than the first scheduled pick-up on their scheduled trip manifest nor are drivers allowed to stay later than the last scheduled drop-off on their manifest for an early or late pickup request.

Procedures for Pick-up Locations

To provide safe, on-time service for all passengers, GCT has developed the following procedures:

Apartment Complexes

Passengers who live in a large, multiple-unit apartment complex must meet the bus at the curb closest to their address. Passengers in apartment complexes that are inaccessible to paratransit vehicles (for example, low clearances, cul-de-sac, et cetera) must meet the paratransit vehicle at the main entrance to the complex. If the complex has a guarded gate or limited access, the passenger should inform the security staff of the scheduled bus pick-up and return times. If a passenger is visiting someone inside a guarded gate or limited access complex, it is the passenger's responsibility to advise the person they will be visiting ahead of time for access.

Office/ Medical/ Mall/ Churches and Other Complexes

Passengers traveling from a large office complex, medical facility, malls, churches, or other large areas must meet the paratransit vehicle at the curb closest to the main reception desk or main lobby entrance. Drivers remain with the vehicle and do not go inside the complex or facility.

Nursing Homes/ Assisted Living Centers

Passengers traveling from a nursing home or hotel should meet the paratransit vehicle at the curb closest to the main lobby unless instructed otherwise. Drivers remain with the vehicle and do not go inside the center.

Adult Day Care and Dialysis Centers

Passengers should be waiting in a designated area when the paratransit vehicle arrives for their pick-up at the centers. Drivers will assist passengers in boarding the vehicle. Drivers remain with the vehicle and do not go inside the facility. It is highly recommended that the center contact GCT by calling the GCT Control Center Hotline at 770.246.4770 and “press 2” if there is a problem with the scheduled pick-up time. GCT does not handle emergency trips to the hospital.

Malls

Passengers will be picked up and dropped off at the main entrance that is closest to the food court location. Operators remain with the vehicle and do not go inside the mall.

Exception

If a facility’s main reception desk or main lobby entrance does not meet ADA accessibility standards, it is the passenger’s responsibility to contact the facility administrator for determination of their designated accessible entrance and notify GCT **prior** to the trip.

What If My Vehicle is late?

If the vehicle has not arrived within 30 minutes after the scheduled pickup time, call GCT Dispatch at 770-246-4770 or TDD at 711 for late vehicle assistance.

NO-SHOW POLICY

What If I Fail To Show Up For A Scheduled Trip?

Gwinnett County Transit understands that because paratransit services requires trips to be scheduled in advances, riders may sometimes miss scheduled rides or forget to cancel rides they no longer need. GCT also understands that riders may sometimes miss scheduled trips or be unable to cancel trips in a timely way for reasons that are beyond their control. However, repeatedly missing scheduled trips or failing to cancel trips in a timely way can lead to suspension of service. The following information explains GCT's no-show policy.

Definitions

Advanced Cancellation – when the customer (or the customer's representative) calls and cancels a specific scheduled trip at least 1 hour before the pick-up window. Early morning trips scheduled for pickup before 7:00 AM are to leave a cancellation message with the Paratransit Dispatcher to cancel a trip before 6:00 AM.

Cancel at Door – when the vehicle arrives at the location designated for a specific scheduled trip within the 30 minute pick up window and the customer (or the customer's representative) notifies the driver at that time that they no longer need the scheduled trip. These are considers No Shows.

The driver is not responsible for cancelling any other trips booked for that day. Customers (or the customer's representative) must call GCT Paratransit Dispatch) to cancel other trips

Late Cancellation – the customer (or the customer's representative) does not call to cancel a specific scheduled trip at least 1 hour prior to the pickup window (other than early morning trips as identified above). Late cancelations will be treated as No Shows.

No Show – A No Show is defined when all the following criteria have occurred:

- There has been no call by the customer (or the customer's representative) to cancel the scheduled trip 1 hour or more before the pickup window.
AND
- The vehicle arrives at the schedule pickup location within the 30 minute pickup window
AND
- The driver cannot reasonably see the customer approaching the vehicle within five (5) minutes
AND
- The dispatch office is notified. At this time, dispatch will verify that the operator is at the location.

Late cancellations and cancellations at the door will be treated as No Shows.

GCT schedules pick-up and return trips separately and assumes all schedule return trips are needed unless notice is given by the customer or their representative. If a pick-up trip is a no-show, GCT will not automatically cancel the return trip. A No Show on the return trip will count as the second No Show for the day.

What is Beyond the Rider's Control?

There are many circumstances that may be beyond the rider's control, including but not limited to:

- Family emergency
- Illness that precluded the rider from calling to cancel
- Personal attendant or another party who didn't arrive on time to assist the rider
- Rider was inside calling to check the ride status and was on hold for extended time
- Rider's appointment ran long and did not provide opportunity to cancel in a timely way
- Another party cancelled rider's appointment
- Rider's mobility aid failed
- Sudden illness or change in condition
- Adverse weather impacted rider's travel plans, precluding the rider from cancelling in a timely way

Riders should contact GCT Dispatch at 770-246-4770 or TDD at 711 when experiencing no-shows or late cancellations due to circumstances beyond their control.

GCT error, which may not be counted as a rider no-show, includes but is not limited to:

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

Suspension Policies for a Pattern or Practices of Excessive No-Shows and Late Cancellations

Gwinnett County Transit monitors missed trips on a monthly basis and reviews all recorded non-shows and late cancellations to ensure accuracy before recording them in a rider's account. This Policy is intended to discourage a pattern or practice

of missed scheduled trips.

GCT evaluates a pattern or practice of missed trips based on a rider's frequency of paratransit service use as compared to established thresholds (see table 1).

- GCT may suspend for a reasonable period of time, provision of paratransit service to an eligible person who has established a pattern or practice of missing scheduled trips.
- A Practice of "No Show" is considered when No Shows total 10% or more of a customer's total trips in a rolling 30-day period, and may result in a penalty.

TABLE 1: Determining Pattern or Practice of Excessive No-Shows

Scheduled Trips Per Rolling 30-Day Period and Not Canceled in Advanced	Number of No Shows Per Period Which Equal a Violation
1-15	2
16-30	3
31-40	4
41 or more	5

A rider will be subject to suspension only if both the maximum number of trips and the maximum number of no shows are reached during the 30-day period. Customers should not consider the maximum number of No-Shows as a justification for not calling when a trip is not needed. .

No-Show Notifications and Penalties

Customers will be contacted for every appearance of a no-show or late cancellation. GCT shall call the rider to determine if there was a reason for the missed scheduled trip. If there was no evidence that the missed trip was beyond the control of the passenger or operator, the customer service agent will remind the rider of the no-show policy and the potential suspension of service implications. If applicable, the no-show or late cancellation will be documented; and will be used to determine a pattern or practice per the criteria in Table 1.

TABLE 2: Consequences for an Established Pattern or Practice of No-Shows

Violation	Consequence
1 st Violation	Letter of Warning and/or Phone Contact
2 nd Violation	2 Day Suspension
3 rd Violation	3 Day Suspension
4 th Violation	5 Day Suspension and Loss of Subscription Service
5 th + Violation	10 Day Suspension and Loss of Subscription Service
Violation History Cover a 12-month rolling period	

Special Exceptions

When a suspension would prevent a rider for receiving medical services that are deemed life-sustaining by the rider's medical provider, the Transit Division Director may grant an exception to a rider's suspension for the life-sustaining trips. Such special exception medical trips will be provided as demand trips and require individual trip reservations.

Loss of subscription services takes effect with 4 violations in a floating 12-month period, and will not be removed until the customer has 3 consecutive months without any No-Show or late cancellations.

If a customer should exceed the No-Show threshold, they will receive a suspension letter in the mail, proposing to suspend service within two weeks. All suspension notices will include a copy of this policy, information on disputing no shows or late cancellations, and how to appeal suspensions. Suspension of service privileges will be postponed pending completion of the appeals process.

Before the suspension of paratransit service, GCT shall take the following steps:

- Notify the individual in writing that GCT proposes to suspend service, citing with specificity the basis of the proposed suspension and setting for the proposed sanction
- Provide the individual an opportunity to be heard and to present information and arguments
- Provide the individual with written notifications of the decision and the reasons for it.
- If the individual wishes to appeal then the suspension will be stayed pending the outcome of the appeal.

No-Show Disputes and Appeals

Any passenger who receives a no-show violation will be notified of such in writing. The passenger has the opportunity to appeal any no-show, violation, or suspension. The appeal must be in writing and received by GCT within fourteen (14) calendar days from the date of the notification letter.

Mail Letter of Appeal to:

**Gwinnett County Transit
Re: No-Show Appeal
3525 Mall Boulevard, Suite 5-C Duluth, GA 30096**

The passenger will be notified in writing of an appeal hearing date and time. Appeals are held the third Monday of each month unless otherwise notified.

THINGS TO KNOW WHEN RIDING PARATRANSIT SERVICE

What If My Caretaker Is Not Available At The Drop-off Location?

If the passenger cannot be left unattended after exiting the vehicle and the caretaker is not at the drop-off location when the vehicle arrives, the passenger will remain on the vehicle and the vehicle will continue as scheduled. The operator will contact GCT Dispatch for assistance. GCT Dispatch will call the emergency contact number and provide the caretaker with the next safe drop-off location to meet the vehicle in-route. If the contact number is not answered or if the number is disconnected, DFCS/911 will be called to take custody of the passenger.

The first instance will be a written warning, the second instance within a 180 day period the passenger's service will be suspended for fourteen (14) calendar days. If this situation happens a third time within a 180 day period, the passenger's service will be suspended for thirty (30) calendar days. If this situation happens a fourth time within the 180 day period, the passenger's service will be suspended for sixty (60) calendar days. If the situation happens a fourth time, the caretaker will have to show cause why the service should not be permanently removed.

Who Can Travel With Me?

Personal Care Attendant:

- A Personal Care Attendant (PCA) is someone designated or employed specifically to help an ADA eligible paratransit passenger meet his/her personal needs. This individual may either be an employee of the passenger, a relative, a friend, or a care provider.
- During the application process for eligibility, the applicant should indicate whether he/she will travel with a PCA.
- PCA's travel at no cost when accompanying the eligible paratransit passenger.
- If the GCT Paratransit passenger requires a PCA and is under the age of 12, the PCA must be an adult
- The PCA must be physically able to assist and meet the needs of the paratransit customer. For example, must be able to push a wheelchair, or provide other assistance as required by the certified rider.
- The PCA riding with a GCT paratransit eligible customer must board and exit the vehicle at the same location as the eligible rider.
- Please inform the reservationist when scheduling the passenger trip(s) if a personal care attendant will be traveling with the passenger.

Travel Companions:

- You may travel with one companion.

- If you travel with a PCA, you may travel with one companion in addition to your PCA.
- Additional companions will be allowed on a space available basis.
- Travel Companions are subject to the regular GCT ADA Paratransit fare.
- The Traveling Companion riding with a GCT paratransit eligible customer must board and exit the vehicle at the same location as the eligible rider.

Children:

- Children who are not taller than the height of the farebox travel at no cost when accompanying the eligible paratransit passenger.
- GCT requires all children under age 8, and whose height is less than 57 inches or weight is less than 40 pounds, to be properly secured in an approved car seat or booster seat appropriate for the child's height and weight. Adult passengers accompanying the child must provide the car seat or booster seat.

Companions, personal care attendants, escorts, and children are not allowed on a vehicle without the eligible passenger aboard. Traveling companions, including children, that ride with the certified paratransit passenger do not need to be certified by GCT and do not need an ID card. Additional companions may ride on a space available basis only and must pay the appropriate fare. Child companions, over 42 inches, riding with eligible passengers must pay the appropriate fare. When scheduling trips, passengers must inform the reservations if they are going to be accompanied by a companion and any mobility device(s) the companion will be using?

What Is The Fare?

- One-way ADA Paratransit trip fare is \$4.00. GCT ADA Paratransit 10- ride ticket books are available for \$40.00. The GCT ADA paratransit photo identification card is also a functioning Breeze card --- both 10- ride ticket books and stored cash value can be loaded onto the GCT ADA Paratransit Breeze card at the GCT Customer Service Office and at MARTA Breeze vending machines.
- Fares may be paid with exact \$4.00 cash, tickets or using the Breeze card. Fares will be collected in the fare box or by tapping the Breeze pad at the front of the vehicle. **Drivers do not make change or stop for change.**
- PCAs travel at no cost. (The need for a PCA is indicated during the application process.)
- One travel companion may travel with the eligible paratransit passenger. Additional travel companions may ride on a space available basis. All travel companions including children who are taller than the height of the fare box must each pay the ADA paratransit fare of \$4.00.
- GCT ADA Paratransit passengers can transfer to and from GCT fixed route express and local routes. Most transfers are free, but upcharges apply when transferring to a higher fare-service. For example, if a passenger transfers

from a GCT fixed route local bus to a GCT paratransit vehicle, an additional \$1.50 is collected to complete the \$4.00 fare.

- There are **no free transfers** between GCT ADA paratransit vehicles and MARTA Mobility (paratransit) vehicles. Passengers will be required to pay full fare for each interagency transfer boarding at the MARTA Doraville rail station.
- Customers with a GCT ADA Paratransit Photo ID Card can also ride fixed route services for half fare. Passengers must show their ID to the operator to prove eligibility and can pay cash \$1.25. If customers would like to take advantage of the FREE Transfer to MARTA, the customer would need to also have the GCT Half Fare Breeze Card.

What About Visitors With Disabilities?

Visitors to Gwinnett County who are functionally disabled will be given “presumptive eligibility” and can ride GCT ADA paratransit service for up to twenty-one (21) days (per) year without being certified by GCT. Visitors must provide proof of disability when boarding the vehicle by presenting an ADA identification card from another transit system.

The GCT ADA paratransit photo identification card will be recognized throughout the United States and passengers may use it to ride paratransit service wherever it is available. Check with the local transit provider for the exact rules and regulations for scheduling a trip.

If your plans require you to travel in other metro Atlanta service areas, you must make a reservation with the GCT paratransit service and with the other service agency (that is, MARTA and Cobb Community Transit; CobbLinc). GCT reservation agents can provide reservation numbers for contacting the other metro Atlanta transit systems.

Procedures When Using A Wheelchair or Other Mobility Devices?

GCT will transport all wheelchair types and other mobility devices as defined by ADA regulations. GCT may not be able to transport a passenger in a wheelchair or mobility device that exceeds the lift manufacturer’s dimensions and design load for the lift in our current paratransit vehicle. That is, mobility devices measuring over 30 inches in width and over 48 inches in length when measured two inches above the ground and weighing up to 800 pounds combined weight when occupied.

For passenger safety and comfort, the following guidance and procedures must be met:

- For safety purposes, it is strongly recommended that wheelchairs back onto the lift platform.
- Brakes must be locked while on the lift.
- Electric power must be turned off until the driver instructs the passenger to re-engage.

- Mobility device passengers must wait for the driver's assistance and follow instructions for entering the vehicle.
- It is strongly recommended for the passenger's safety that a person using a manual wheelchair have attached footrests.
- Passengers with inoperative mobility devices will try to be accommodated, but operators will not lift or carry the passenger or the mobility device. Passengers maybe requested to move to a seat for safety and securement.

Scooters

Scooter-type mobility devices are often unstable on lift equipment, and they may exceed allowable dimensions and weight. Some scooters also come with a manufacturer's warning that they should not be used as seats on moving vehicles. Passengers may ride standard scooters on the lift, but it is strongly recommended that our passengers transfer to a paratransit vehicle seat, whenever possible. Passengers traveling on scooters must adhere to the same safety procedures listed for wheelchairs

Mobility Device Securement and Seat Belt Policy

It is the driver's responsibility to ensure that mobility devices are properly secured. Mobility devices are required to be secured into the four point tie-down system at all times during the ride. Drivers are required to secure the lap and shoulder belts to ensure the passenger's safety. Cooperation with the Securement and Seat Belt Policy is in the best interest of safety for the passenger.

Ambulatory Passengers

Passengers unable to use the steps to enter the vehicle may stand on the lift platform to be lifted into the vehicle. Passengers who stand on the lift must be able to stand without assistance and to hold the rails with both hands. Passengers that are unable to stand on the lift platform should discuss with the reservation agent so that GCT Paratransit can assist with other ways to board and depart the paratransit vehicle.

May I Transport Packages and Personal Items?

You may bring grocery bags, luggage, or other packages or (legal) personal items with you on GCT Paratransit. Please do not bring more than you and/or the persons who are traveling with you can manage without delaying the vehicle, however. Drivers are not required to assist with loading and unloading of packages and personal items. Delaying the vehicle occurs when you bring more items than you can carry on the vehicle at one time and you keep the vehicle from being able to move on after five (5) minutes. Delaying the vehicle will result in a No-Show being assessed to your record.

Additionally, please keep in mind that this is a shared-ride service and space is limited. Grocery store carts are not permitted on vehicles, but you may bring packages on-board in a personal two-wheeled, collapsible cart. If you are bringing

a cart with you, let the reservation agent know when you request your transportation so we can schedule an accessible vehicle that will best accommodate the collapsible cart. Packages may not take up seats on the vehicle and must be safely stowed out of the aisle, either under your seat or on your lap.

Remember, if you bring more bags/groceries than can be carried on or off and you delay the departure of the vehicle beyond five (5) minutes, you will be assessed a No-Show.

Respirators and Portable Oxygen Equipment

Portable oxygen equipment and portable respirators are permitted on all GCT vehicles. The driver will assist you in securing this equipment on the vehicle. Drivers are not permitted, however, to assist you in using this equipment. If you need assistance with portable life support equipment, please arrange to bring someone who can help you.

May I Transport Animals?

Service animals are allowed in all GCT vehicles and facilities. A service animal is defined by ADA as any guide dog or signal dog individually trained to work or perform tasks for an individual with disability, including but not limited to, guiding individuals with impaired vision, alerting individuals with impaired hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items. **Pets are not allowed in any GCT vehicle or facility.**

If you have an allergy to dogs (not including pet dander) please notify GCT Paratransit when scheduling your reservation. This will aide in assisting that you are not placed on a vehicle with a live animal to which you have an allergic reaction.

If you are traveling with a service dog on GCT Paratransit, be sure to inform the reservation agent when you are scheduling a ride.

Please be aware of the following procedures and guidelines:

- A service dog must behave under the voice command of its owner.
- Procedures for travelling with service dog involve loading the animal first and unloading the animal last.
- For the safety and comfort of the driver and other passengers, service dogs are required to be clean, well groomed, completely under the control of their handler, and absolutely non-aggressive.
- You are responsible for maintaining control of your service dog while on board the vehicle. The dog must remain at your feet or on your lap. The dog may not sit on a vehicle seat.
- You are encouraged to bring a blanket for service dog since vehicle floors may be hot.
- For safety reasons, drivers are not permitted to handle the animals.

What Is My Responsibility When Riding A GCT Paratransit Vehicle?

Each passenger must adhere to the rules of conduct. The following rules of conduct are provided to ensure the safety and comfort of all GCT Paratransit passengers:

- GCT Paratransit is public transportation and a fare is required when you board the vehicle. If you do not pay a fare at that time, the driver will refuse to provide the ride. Deliberate fare evasion will be grounds for refusal of service.
- The use of abusive, threatening, or obscene language or actions towards the driver or other passengers is prohibited.
- Passengers are prohibited from eating or drinking on the vehicle unless a medical condition requires one to eat or drink at specified times. In such cases, the passenger must advise the reservation agent of this fact.
- Smoking shall be kept off of and away from the vehicle.
- The use of alcoholic beverages and illegal drugs, or riding under the influence of intoxicating alcohol or drugs, is prohibited at all times.
- The use of electronic equipment (music, games, etc.) shall be with headphones and kept at a low enough volume so as not to be heard by and disturb other passengers.
- Due to the nature of our shared-ride system, passengers should take great care in tending to their personal hygiene, showing respect to other passengers' desire for a comfortable ride.
- Passengers shall not operate or tamper with any equipment while on the vehicle. This rule includes operation of the lift and attempts to remove mobility device tie-downs or passenger seat belts.
- Baby strollers and two-wheeled collapsible carts shall be folded and stowed to avoid blocking the aisle or causing injury to persons on the vehicle.
- Be respectful of service animals and refrain from petting them without the permission of the owner.
- Trash shall be disposed of properly both on and around the vehicle.
- Parents/accompanying adults travelling with children shall maintain control of the children during the ride.
- Head, arms, and other body parts must be kept inside the vehicle.
- Objects may not be thrown from the windows.
- Federal regulations prohibit the transportation of flammable or explosive materials on transit vehicles.

Actions of misconduct, including violent or disruptive behavior, will be grounds for suspension of service. Anyone found to be acting in an unsafe or illegal manner which may endanger himself/herself, other passengers, the driver, the paratransit vehicle, or the travelling public will be terminated from the service immediately. Passengers must depart the transit vehicle upon demand of any authorized GCT representative, including the driver.

Passengers, their Personal Care Attendants, or their travel companions who violate rules of courtesy and conduct may be subject to penalties up to and including

suspension of that passenger's service.

Passengers, their Personal Care Attendants, or their travel companions who engage in physical abuse or cause physical injury to another passenger or the driver, or who engage in other illegal activities, may be subject to **immediate and permanent suspension from receiving** Paratransit service. Passengers may also be subject to criminal prosecution, which may include fines.

Passengers, their Personal Care Attendants, or their travel companions who engage in an activity that disrupts the safe or effective operation of Paratransit services may be subject to a suspension of that passenger's service. If a passenger on their own is disruptive to GCT service, GCT reserves the right to require that a Personal Care Attendant travel with the passenger as an alternative to service suspension.

Any passenger who is suspended from service will be notified in writing and will be given an opportunity to appeal the suspension.

What are my Responsibilities As a GCT Paratransit Customer?

- Be informed regarding program benefits and limitations.
- Schedule trip requests up to three (3) days in advance. In accordance with ADA, riders may be asked to negotiate a different time of pickup to one (1) hour before or one (1) hour after the requested time. Once the time has been negotiated, it cannot be changed without the passenger's consent.
- Be ready and remain at the pickup location up to 30 minutes after the scheduled pickup time. Wait at the main entrance door in an area where you can see the vehicle, as drivers will not enter the building or residences.
- Call in trip cancellations as soon as possible but not later than one (1) hour before the scheduled pickup time.
- Have times, addresses, zip codes and other needed information ready when making a reservation.
- Present correct fare and/or fare media when boarding the vehicle.
- Keep wheelchairs and other mobility devices in good working condition, including having an operable wheelchair brake.
- Expect shared-ride service equivalent to bus (not taxi) service. Travel time should be comparable to service provided by GCT fixed route service including transfers.
- Request a pick-up time taking the 30-minute window time, distance and rush hour traffic into consideration.
- Allow sufficient time, at least 1-hour, between scheduled drop-off and return time.
- Advise the reservationist of your appointment time or work report time if you must arrive at a certain time. The reservationist can provide you with a pickup time that takes into consideration travel time and your appointment time.

What Is The Driver's Responsibility?

Drivers are expected to obey the same rules as passengers. The following additional rules also apply:

- Drivers may assist passengers when boarding or exiting the vehicle, to and from the curb of their destination or point of origin. If assistance beyond the curb is required, notice must be given to the reservation agent when the trip is scheduled.
- Drivers cannot make change for fares. Drivers are not allowed at any time to accept tips or gratuities, or act in a manner that would suggest that tipping is appropriate.
- Drivers may provide limited assistance loading/unloading packages for passengers.
- Drivers are responsible for the operation of the lift and other equipment, and for securing mobility devices and passengers safely in the vehicle.
- Drivers are not allowed to talk with passengers or engage in any other distracting activity (for example, using a cell phone or electronic audio and/or video device) while operating a vehicle.

What Can Customers Expect from GCT Paratransit Services?

- Safe trips in air-conditioned accessible vehicles
- Operators that are trained to meet rider's special transportation needs
- Safe, Clean, properly equipped, smoke-free vehicles.
- Correctly fastened seat belts and/or wheelchair tie-downs
- Pickups within 30 minutes of the scheduled pick up time. Passengers are not required to be ready for travel before the scheduled pickup time but can do so if desired.
- Professional and courteous treatment from all GCT staff and other passengers.
- Refuse uncase service and file complaints without fear of reprisal.
- Prompt investigations and effective resolution of complaints.
- Current and complete program information.
- Assistance getting in and out of the vehicle and to the main entrance of the destination if required. Operators are not permitted to lift passengers and cannot enter buildings or residences
- Prompt resolution of passenger's concerns.
- Timely certification and registration of eligible applicants.

What If I Lose Something While Riding A GCT Paratransit Vehicle?

Any personal property and items left on the vehicle will be turned in to GCT's lost and found department at the bus garage. Personal property and items will be held for thirty (30) days. Please call GCT Customer Service at 770.822.5010 and "press 2" or TDD at 711 during normal business hours,

8:00am to 5:00pm, Monday through Friday for instructions on how to claim and where to pick up lost personal property and items.

Hazardous Weather and Emergency Event Policy

In the event of snow, ice, or other potentially hazardous weather or emergency situations, GCT may cancel paratransit service. GCT paratransit will not transport in unsafe conditions. GCT's highest priority is the safety of its passengers and employees. While every effort will be made to operate vehicles according to confirmed schedules, hazardous road conditions or emergency events may cause operation of vehicles to be unsafe and, therefore, service may be temporarily terminated. If conditions warrant, vehicles may operate on a limited basis. GCT will resume regular service when all roads are clear and safe for travel or the emergency event has ended.

As soon as operational decisions are made to terminate or reopen services, local radio and television stations will be notified. Updates will be posted on the GCT web page www.gctransit.com, as well as the GCT Facebook and Twitter pages. You may also contact the GCT Control Center Hotline at 770.246.4770 and "press 2" or TDD at 711 to check the status of paratransit service operations.

How Can I Make Comments and Suggestions About GCT Paratransit?

GCT seeks to provide its citizens with safe, reliable and efficient transportation. We look forward to working with you to provide the best service possible. If you have any comments and suggestions including questions, complaints or compliments, please 1) call GCT Customer Service at 770.822.5010 and "press 2" or TDD at 711 during normal business hours, 8:00am to 5:00pm, Monday through Friday, or 2) submit comments using the GCT web page www.gctransit.com and on the left side of the page click on the 'Comments and Suggestions' link, or 3) write GCT

Customer Service at the following address:

Gwinnett County Transit
Re: Comments and Suggestions
3525 Mall Boulevard, Suite 5-C Duluth, GA 30096

Specific details help GCT thoroughly address your comments or suggestions. Please include the following information when calling or writing:

- Your name, address and telephone number.
- Day, date and time of experience.
- Vehicle number and/or driver name, if applicable.

- Reservation agent name or other employee name, if concerning a telephone conversation.
- Explanation of the incident or suggestion.

Other Services

CPACS

CPACS has many services available including transportation programs. They offer a CPACS Express service as part of Federal Funding 5307 Low Income money and also offer a Share Ride Mobility Services. More information can be found at www.cpacs.org/transportation/ or contacting the Main Office Number at 770-936-0969

Senior Services

Gwinnett County Senior Services offers some programs for transportation assistance. The program includes a transportation voucher program and a volunteer driver program. For more information call senior services at 678-377-4150

Attachment D
Gwinnett County Transit Application for Paratransit Eligibility



APPLICATION FOR GCT PARATRANSIT ELIGIBILITY

***BEFORE COMPLETING THE APPLICATION PLEASE READ THE GCT
PARATRANSIT SERVICE RIDER'S GUIDE AND THIS APPLICATION***

If you have any questions regarding this application, please contact the Paratransit Certification/Enrollment Office at 770.822.5010 and "press 3".

Dear Applicant:

The Americans with Disabilities Act of 1990 (ADA) is a civil rights law that prohibits discrimination against people with disabilities. The intent of ADA is to ensure that persons with specific disabilities have equal access to public transportation. In accordance with ADA, Gwinnett County Transit (GCT) must provide a variety of services, including paratransit service. Paratransit service is a specialized service providing an origin to destination shared-ride service for eligible individuals with disabilities who are unable to use the regular fixed route bus service.

GCT is required to determine the eligibility for paratransit service for individual applicants. Categories of eligibility for paratransit service are as follows:

"UNCONDITIONAL ELIGIBILITY" (or "ALL TRIP ELIGIBILITY")

This outcome would be appropriate if it is determined that it is not reasonable to expect the applicant to use fixed route service for any trips, under all conditions.

"CONDITIONAL ELIGIBILITY" (or "SOME TRIP ELIGIBILITY")

This outcome might be appropriate if the individual can reasonably be expected to use fixed route service for some trips (when barriers that prevent travel are not present) but cannot be expected to use fixed route service under some conditions.

"TEMPORARY ELIGIBILITY" (or "TRANSITIONAL ELIGIBILITY")

This outcome might be appropriate if the applicant's disability is only temporary or if his or her functional abilities are expected to change in the short-term. A term of eligibility that is less than the term typically granted might be appropriate. Temporary eligibility can be unconditional or conditional.

"NOT ELIGIBLE" (or "FIXED ROUTE ELIGIBLE")

This determination would be appropriate if the applicant can reasonably be expected to use fixed route service for any trips under all conditions.

A DISABILITY DOES NOT AUTOMATICALLY MAKE SOMEONE ELIGIBLE FOR PARATRANSIT SERVICE. GCT'S FIXED ROUTE BUSES ARE FULLY ACCESSIBLE TO PERSON'S WITH DISABILITIES AND SENIORS. Eligibility for ADA Complementary Paratransit service is based on limitations to an individual's abilities not just the presence of a disability. Eligibility is determined by your functional ability to ride or access the fixed route accessible bus service. It is not a medical determination; it is a

functional ability analysis. A disability that makes travel more difficult, but not impossible, does not qualify you for eligibility.

If you believe your disability may fit into one of the categories described above, you must apply for certification. The questions in this PART A of the application process represent the first step to certify your application for eligibility to use GCT's Paratransit Service. Please answer each question because the answer will assist us in determining the appropriate service to match your abilities.

It is your responsibility to return the completed and signed PART A to GCT. You also must sign the Authorization Page of this form authorizing your Licensed/Certified Professional to release information regarding your disability and functional ability to access and use the accessible fixed route bus service.

On the Authorization Page, please be certain to provide complete information on the Licensed/Certified Professional who can appropriately answer questions about your disability and your functional ability to travel. Please note: the person filling out PART A of this application cannot be the same person who will fill out PART B as the Licensed/Certified Professional.

It is strongly recommended that the Licensed/Certified Healthcare Professional be someone who is familiar with your functional ability. In other words, a family medical doctor may have less knowledge about a person who has:

- A mental health disability as opposed to a counselor, psychologist or psychiatrist;
- A visual impairment as opposed to a mobility specialist;
- A developmental disability as opposed to a case manager or supportive employment specialist;
- A mobility impairment as opposed to a physical therapist or occupational therapist.

Mail completed Part A application including all required signatures to the following address:

**Gwinnett County Transit
Re: Paratransit Application Part A
3525 Mall Boulevard, Suite 5-C
Duluth, GA 30096**

When the completed PART A is received by GCT, PART B of the application will be forwarded to the Licensed/Certified Professional who was listed by you in PART A. Your application will be considered complete once your Licensed/Certified Professional has completed and returned PART B to GCT. GCT will provide a decision as to your eligibility within 21 days, once the completed application is received.

Thank you for your assistance,

Paratransit Services Manager

ALL QUESTIONS ON THIS APPLICATION ARE REFERRING TO YOUR FUNCTIONAL ABILITY TO USE THE FIXED ROUTE, ACCESSIBLE BUS.

PART A APPLICANT INFORMATION (PLEASE PRINT) DATE: _____

Please check one: Initial Application _____ Re-certification Application _____

Last Name _____ First Name _____ MI _____

Street Address _____

City _____ State _____ Zip Code _____

Telephone Number: (day) _____ (evening) _____ (cell) _____

Date of Birth _____ Male _____ Female _____

Email Address for correspondence (OPTIONAL): _____

Emergency Contact Name: _____

Emergency Contact Phone Number: () _____

Closest bus stop to your residence. (If you are not sure, please call 770.822.5010 and "press 3").

Name of subdivision or apartment complex: _____

Nearest major intersecting street: _____

Nearest cross street to your residence: _____

Please fill out the requested information.

List the Medical Names of Your Disabilities or Medical Conditions	Is the Condition Permanent?	Duration of Condition	Medications taken for the Condition
	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	Yes <input type="checkbox"/> No <input type="checkbox"/>		

1. How does the condition(s) affect your ability to ride the regular (big), fixed route, accessible bus service? Be very specific. _____

2. Do you have a **Cognitive Disability**? (Have you ever been diagnosed with Traumatic/ Non-Traumatic Brain Injury, Mental Retardation, Borderline Intelligence, Down's Syndrome, Autism, etc.?) Yes ☐ No ☐

Please explain: _____

3. Do you experience any of the following? Please check all that apply and explain:

<input type="checkbox"/> Panic Attacks	<input type="checkbox"/> Confusion
<input type="checkbox"/> Hallucinations	<input type="checkbox"/> Easily Agitated or Angered
<input type="checkbox"/> Delusions	<input type="checkbox"/> Experience Paranoia
<input type="checkbox"/> Short Term Memory Difficulties	<input type="checkbox"/> Cannot Identify Pictures
<input type="checkbox"/> Long Term Memory Difficulties	<input type="checkbox"/> Cannot Read or Write
<input type="checkbox"/> Easily Wander Off	<input type="checkbox"/> Difficulty Understanding
<input type="checkbox"/> Easily Taken Advantage of by Others	<input type="checkbox"/> Written or Verbal Instructions
<input type="checkbox"/> Visual Difficulties	<input type="checkbox"/> Anxiety
<input type="checkbox"/> Inappropriate Behaviors	<input type="checkbox"/> Hear Voices

Please explain: _____

4. Do you experience **Seizures**? Yes ☐ No ☐ If yes, please check all that apply and explain:

☐ Grand Mal ☐ Petit Mal ☐ Temporal Lobe ☐ Epileptic Lobe

Please explain: _____

5. When having a seizure, I: Please check all that apply:

<input type="checkbox"/> Am Difficult to Arouse	<input type="checkbox"/> Need Immediate Medical
<input type="checkbox"/> Black Out	<input type="checkbox"/> Attention
<input type="checkbox"/> Fall Asleep	<input type="checkbox"/> Stare Blankly into Space

Please explain: _____

6. How often do they occur? _____

7. Are you currently taking medication to control them? Yes ☐ No ☐

8. Do you have a **Visual Disability** (to include Blindness)? Yes ☐ No ☐

Please check all that apply and explain in detail:

_____ I wear contacts or glasses.

_____ I can recognize my stop if announcements are made.

_____ I am legally blind and cannot distinguish my appropriate stop, disembark, and navigate the route to my destination. I do not use a guide dog or other service animal, or any assistive device.

_____ I use a guide dog or other service animal, but I need paratransit to get to destinations that I cannot safely travel to on the route.

_____ I can easily hear and recognize environmental sounds that help me to determine the traffic flow patterns.

_____ I cannot easily hear environmental sounds that help me to determine traffic flow.

_____ I cannot always get out of the roadway before the traffic signal changes.

_____ I require a sighted guide to assist me with the following tasks:

9. Do you have a **Mental/Psychological Disability**? Yes ☐ No ☐ If yes, please state the disability and explain how it affects you. _____

10. Are there any other physical or mental disabilities that impact your **FUNCTIONAL ABILITY** to ride the regular (big), fixed route, accessible bus service? (Example: difficulty with getting to the bus, waiting at the stop for the correct bus, boarding the bus, knowing when you get to your stop and notifying the driver that you need to get off.) Yes ☐ No ☐ If yes, please explain. _____

11. Can you wait 30 minutes at a GCT bus stop that **DOES NOT** have seats and a shelter? Yes ☐ No ☐ If no, please explain. _____

12. Can you wait 30 minutes at a GCT bus stop that **DOES** have seats and a shelter? Yes ☐ No ☐ If no, please explain. _____

13. Can you wait 30 minutes at a GCT bus stop unassisted? Yes ☐ No ☐ If no, please explain. _____

14. How far can you walk without the assistance of another person?

The length of one football field (300ft)?

Yes ☐ No ☐

One lap around a 1/4 mile track?

Yes ☐ No ☐

Two laps around a 1/4 mile track? Yes ☐ No ☐

Three laps around a 1/4 mile track? Yes ☐ No ☐

Are you able to walk up 12-14 inch steps unassisted? Yes ☐ No ☐

If unassisted, can you grip a handrail to support yourself? Yes ☐ No ☐

15. Do you require walking on a bus lift and gripping the handrail in order to board/exit the bus? Yes ☐ No ☐

16. Do you use a mobility device to travel? Yes ☐ No ☐ Please check all that apply.

_____ White Cane
_____ Orthopedic Cane (three or
four prong base)
_____ Standard Cane
_____ Walker

_____ Braces
_____ Crutches
_____ Manual Wheelchair
_____ Motorized Wheelchair
_____ Scooter

17. What is the height/width of your unoccupied wheelchair/scooter?

Height _____ Width _____

18. What is the weight of your wheelchair/scooter while it is occupied by you? _____

19. Do you require the use of a service animal? Yes ☐ No ☐ If yes, what type of animal is used? _____

20. What function does the animal provide for you? _____

21. Do you travel with portable medical equipment? Yes ☐ No ☐ If yes, what type of portable medical equipment? _____

22. Do you require a personal care assistant (PCA) to travel with you to provide transportation assistance? Yes ☐ No ☐ If yes, please explain the specific assistance you require. _____

23. If you do not require a personal care assistant for bus travel, are you required to be met by a caregiver when exiting the bus? Yes ☐ No ☐

24. If the bus arrives at your destination and the caregiver is not there to assist you off the bus, who must be contacted? Name: _____
Telephone: _____

Please note: If the contact number is not answered, or if the number is disconnected, DFCS/911 will be called to take custody of the passenger.

25. Are there situations when your caregiver will not be required to meet the bus?

Yes ☐ No ☐ If yes, please explain. _____

26. Do you need assistance recognizing your stop? Yes ☐ No ☐ If yes, please explain. _____

27. Do you use a communication device to communicate with others such as a driver? Yes ☐ No ☐ Please check all that apply.

_____ Letter Board

_____ Route ID Card

_____ Picture Board

_____ Other Form of Augmentative Communication

Please explain: _____

28. Do you require an alternate format for the Passenger Guide, Fixed Route schedules or any written correspondence? Yes ☐ No ☐ Please check the format you would like to receive them in? **Check only one format:**

_____ CD

_____ Braille

_____ Large print

_____ Audio tapes

_____ Email

29. How do you travel now? Please check all that apply.

_____ Wheelchair/scooter

_____ Operate my own wheelchair

_____ Walk

_____ Assisted in my wheelchair by a service animal

_____ Drive myself

_____ Passenger in someone else's car

_____ Assisted in using the wheelchair by a caregiver or mobility aide

_____ Other van service

_____ Currently have no means of travel

_____ Regular (big), fixed route, accessible bus service

30. Have you ever ridden a regular (big), fixed route, accessible bus? Yes ☐ No ☐ If yes, when was the last time you rode a, regular (big), fixed route accessible bus?

31. Why did you stop using the regular (big), fixed route, accessible bus? _____

32. Would you be able to ride the regular (big), fixed route, accessible bus system if you receive mobility training? Yes ☐ No ☐

33. Have you ever been trained in the use of GCT's bus system? Yes ☐ No ☐ If yes, please explain. _____

34. Who trained you in the use of the GCT bus system? _____

35. Have you ever been trained in the use of any other public bus system? Yes ☐ No ☐

36. Do you feel that you could ride the regular (big), fixed route, accessible bus if the paratransit vehicle could get you to a regular (big), fixed route, accessible bus stop? Yes ☐ No ☐ If no, please explain how your disability restricts this. _____

37. Do you feel that you could ride the regular (big), fixed route, accessible bus if your trip involved riding the regular (big), fixed route, accessible bus, getting off at a bus stop and the paratransit vehicle could pick you up at the bus stop to take you the remainder of your trip? Yes ☐ No ☐ If no, please explain why. _____

38. Please check all that apply to you:

_____ I am able to board, ride, and disembark from regular (big), fixed route, accessible bus.

_____ I need assistance understanding and navigating the fixed route system.

_____ I can stand on a moving bus, holding the handrail, if no seat is available.

_____ I do not have the stamina to travel long distances.

_____ I can use a telephone to get bus schedule information.

_____ I can find my way to the bus stop after being shown where it is based.

_____ I can hear and understand the automatic location announcement system on the bus.

Please explain those items checked above. _____

To the best of my knowledge, the information I have provided as part of this application has been properly recorded. I have reviewed all answers and certify that the information is complete and correct. I understand that any intentional false or misleading information may be grounds for denial of service.

Signature of applicant, representative, or guardian

Date: _____

PATIENT CONSENT TO RELEASE & DISCLOSURE OF MEDICAL INFORMATION

This Consent to Release Medical Information is to be provided to:

(PLEASE GIVE **COMPLETE INFORMATION ABOUT THE HEALTH CARE PROFESSIONAL**

WHO WILL VERIFY YOUR APPLICATION INFORMATION)

LICENSED/CERTIFIED PROFESSIONAL'S NAME (see list below):

ADDRESS: _____

CITY : _____ STATE: _____ ZIP: _____

PHONE #: () _____ FAX #: () _____

I, the undersigned, do hereby consent to the release and disclosure of any relevant medical information to GCT Paratransit Services as called for in Part B of this application for the sole purpose of determining ADA paratransit eligibility. I understand that this information will be shared only with persons making decisions related to my eligibility for paratransit services and to other transit providers needing such information to facilitate travel.

I have read this document carefully and understand that I have the right to revoke this release in writing, excepting information that may have previously been released under this authorization.

Signature of applicant, representative, or guardian Date

Witness Date

Please Note:

Below is a list of the Licensed/Certified Professionals that are authorized to complete Part B.

Physicians, registered nurse, social worker, psychologist, physical therapist, chiropractor, occupational therapist, speech pathologist, special education teacher, nurse practitioner, physician's assistant, mental health counselor, orientation/mobility specialist, respiratory therapist, vocational rehabilitation counselor, or recreation therapist employed by a medical facility.

If someone other than the applicant has completed this application/authorization, that person must complete the following:

Name _____

Relationship _____

Address _____

Home phone _____

Work phone _____

TDD/TTY _____

I certify, to the best of my knowledge that the information provided in this application is complete and correct based upon the information given me by the applicant or my own knowledge of the applicant's health condition or disability.

Signature _____ **Date** _____

FOR GCT OFFICE USE ONLY:

APPROVED _____ CONDITIONAL _____ UNCONDITIONAL _____

CODE(S) _____

DENIED _____

LIST SPECIFIC REASON FOR DENIAL THAT WILL BE STATED ON THE DENIAL LETTER _____

SIGNED _____ DATED _____



PART B: TO BE COMPLETED BY A CURRENTLY LICENSED/CERTIFIED PROFESSIONAL

If you have any questions regarding this application, please contact the Paratransit Certification/Enrollment Office at 770.822.5010 and “press 3”.

The person named on the attached application has applied for Gwinnett County Transit (GCT) ADA Complementary Paratransit Service. To determine if they are eligible, we need to ask the applicant's licensed/certified healthcare professional questions about their functional abilities.

A DISABILITY DOES NOT AUTOMATICALLY MAKE SOMEONE ELIGIBLE FOR PARATRANSIT SERVICE. GCT'S FIXED ROUTE BUSES ARE FULLY ACCESSIBLE TO PERSON'S WITH DISABILITIES AND SENIORS. Eligibility for ADA Complementary Paratransit service is based on limitations to an individual's abilities not just the presence of a disability. **The determining factor in deciding whether a person qualifies for ADA Complementary Paratransit Service is whether he/she can functionally ride or access the fixed route accessible bus service.** It is not a medical determination; it is a functional ability analysis. A disability that makes travel more difficult, but not impossible, does not qualify the person for eligibility.

In order to expedite the processing of this application, GCT requests that you please fill out and fax back Part B of this application within 3 business days of receipt of the application by your office to 770.300.9419.

This portion **MUST** be completed by one of the following currently Licensed/Certified Professionals:

Physicians, registered nurse, social worker, psychologist, physical therapist, chiropractor, occupational therapist, speech pathologist, special education teacher, nurse practitioner, physician's assistant, mental health counselor, orientation/mobility specialist, respiratory therapist, vocational rehabilitation counselor, or recreation therapist employed by a medical facility.

Thank you for your assistance,

Paratransit Services Manager

GCT PARATRANSIT APPLICATION
PART B: TO BE FILLED OUT BY A LICENSED/CERTIFIED PROFESSIONAL

Name of Applicant: _____ Date of Birth _____

Date of applicant's last assessment or interaction with you _____

Please fill out the requested information.

List the Medical Names of Person's Disabilities or Medical Conditions	Is the Condition Permanent?	Duration of Condition	Medications taken for the Condition
	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	Yes <input type="checkbox"/> No <input type="checkbox"/>		

1. Please discuss the impact this disability has on the applicant's **functional ability** to ride a GCT regular (big), fixed route bus. _____

2. If this is a temporary disability, when will the applicant be able to resume normal travel patterns? Please list an actual date _____

3. Under what circumstance does the disability worsen? _____

4. Does the applicant have the mental capacity, visual and/or hearing ability to:

Give addresses and phone numbers? _____

Recognize a destination or landmark? _____

Deal with unexpected change in routine? _____

Ask for, understand and follow directions? _____

Safely/effectively travel through crowded/complex facilities? _____

5. Are there any other medical conditions of which GCT should be aware? Yes ☐ No ☐ If yes, please explain _____

6. How far can the applicant walk without the assistance of another person? **Please check one.**

The length of one football field? (300ft) Yes ☐ No ☐

One lap around a 1/4 mile track? (1320ft) Yes ☐ No ☐

Two laps around a 1/4 mile track? (2640ft) Yes ☐ No ☐

Three laps around a 1/4 mile track? (3960ft) Yes ☐ No ☐

Able to walk up 12-14 inch steps unassisted? Yes ☐ No ☐

7. Can the applicant walk up 12 inch to 14 inch steps assisted? Yes ☐ No ☐

8. Does the applicant use a mobility device to travel? Yes ☐ No ☐ Please check all that apply:

_____ White Cane

_____ Orthopedic Cane (three or
four prong base)

_____ Standard Cane

_____ Walker

_____ Braces

_____ Crutches

_____ Manual Wheelchair

_____ Motorized Wheelchair

_____ Scooter

9. Does the applicant's **occupied** wheelchair/scooter weigh 600 pounds or more?

Yes ☐ No ☐ If yes, how much does the occupied device weigh? _____

10. Does the applicant weigh over 600 pounds? Yes ☐ No ☐

11. Does the applicant require the use of a service animal? Yes ☐ No ☐ If yes, what type of animal and for what function was the animal trained? _____

12. Does the applicant's disability/condition prevent them from traveling to, or riding the regular (big), fixed route accessible bus? Yes ☐ No ☐ If yes, please explain.

13. Does weather impact the applicant's ability to travel? Yes ☐ No ☐ If yes, please explain. _____

14. Does the applicant require a personal care attendant (PCA) to travel with them?

Yes ☐ No ☐ If yes, please explain _____

15. Does the applicant require a caregiver? Yes ☐ No ☐

This certification has been completed by:

Print name of certifying professional _____

Title _____

Address _____

City _____ State _____ Zip _____

Office Phone Number () _____ Fax () _____

E-mail Address _____

License/Certification # _____

What organization issued your License? _____

Signature _____ Date signed _____

PLEASE RETURN BY FAX TO 770.330.9419.



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

Headquarters

East Building, 5th Floor, TCR
1200 New Jersey Avenue, SE
Washington, D.C. 20590

March 16, 2021

Kirk Gagnard
Transit Manager, Transit Division
Department of Transportation
Gwinnett County Government
75 Langley Drive
Lawrenceville, GA 30046

RE: ADA Complementary Paratransit Specialized Review Final Report

Dear Mr. Gagnard:

This letter concerns the Federal Transit Administration's (FTA) ADA Complementary Paratransit Specialized Review of Gwinnett County Transit (GCT), conducted February 4–7, 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 me at 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 GCT will take steps to correct the deficiencies. If you have any questions about this matter, please contact me at (202)-366-1671, or via email at john.day@dot.gov.

Sincerely,

John Day
Program Manager
FTA Office of Civil Rights

Enclosure

cc: Yvette G. Taylor, Regional Administrator, FTA Region 4
Selene Faer Dalton-Kumins, Associate Administrator, FTA Office of Civil Rights