

FTA

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

Connecticut Department of Transportation (CTDOT):
Greater Hartford Transit District (GHTD)
Central Connecticut Regional Planning Authority (CCRPA)

Paratransit Compliance Review Report

May 2016



U.S. Department of Transportation
Federal Transit Administration

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Attachments

- A FTA Notification Letter to Connecticut Department of Transportation
- B Greater Hartford Transit District's Response to Draft Report

Executive Summary

Objective and Methodology –

This report reviews the ADA complementary paratransit services funded by the Connecticut Department of Transportation (CTDOT), which are currently operated by Greater Hartford Transit District (GHTD) and were formerly also operated by Central Connecticut Regional Planning Authority (CCRPA). Its objective is to verify whether CTDOT is meeting its obligations under the 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 paratransit riders and local disability organizations
2. Site visit: a four-person review team's observations of how GHTD handles trip requests, scheduling and dispatching, examinations of eligibility applications and related documents (including appeals), and interviews with CTDOT and GHTD, and contractor employees
3. Analysis and reporting: using site visit data, identification of deficiencies requiring corrective actions and suggestions of effective practices in complementary paratransit service

Greater Hartford Transit District's (GHTD) ADA Complementary Paratransit Program includes the following positive program elements:

Positive Program Elements

- GHTD's eligibility program appears thorough and well-designed to meet the needs of an agency of this size. It makes appropriate use of technology and meets or exceeds DOT ADA processing time requirements.
- GHTD participates in Connecticut Department of Transportation's (CTDOT) service planning process and has well-established procedures for updating its ADA paratransit service hours, days, and area in collaboration with CTDOT service planners when bus schedules change.
- In a short period of time, working in partnership with CTDOT, GHTD successfully integrated Central Connecticut Regional Planning Authority's (CCRPA) ADA paratransit program into its own service. This included eligibility and service record transfer, for which manual data entry was necessary.
- CTDOT and GHTD work together to budget and plan to meet all ADA paratransit demand, including upgrading technology and fleet expansion.

GHTD's ADA Complementary Paratransit Program has the following administrative deficiencies that are easily correctable to bring the program into compliance with 49 CFR Parts 27 and 37:

Administrative Deficiencies

- GHTD's website, correspondence, and printed information do not consistently provide notification that information in an accessible format is available upon request.
- GHTD's eligibility certification letters do not always provide specific reasons for decisions in cases of temporary or conditional eligibility determinations.
- GHTD's public information materials and Policy #39 do not correctly describe the basis for ADA eligibility as a visitor.
- GHTD's Administrative Appeals Policy #40 requires written appeals and provides no explanation of the individual's right to a hearing.
- GHTD's No-Show Policy #30 and public information materials require clarification of conditions triggering suspension to assure reasonableness.

GHTD's ADA Complementary Paratransit Program has the following substantive deficiencies that need to be addressed to bring the program into compliance with 49 CFR Parts 27 and 37:

Substantive Deficiencies

- Test calls and telephone data analysis indicate long hold times in GHTD's reservations unit.
- GHTD's driver roster appears insufficient to adequately serve current or increased passenger volumes with the consolidation of New Britain/Bristol service into GHTD service.

Please see Section 6 for a discussion of all six deficiencies. The Summary Table of Compliance Review Findings (following Section 6) lists all findings. Unless otherwise stated, GHTD 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 the ADA complementary paratransit services funded by the Connecticut Department of Transportation (CTDOT), which are currently operated by Greater Hartford Transit District (GHTD) and were formerly also operated by Central Connecticut Regional Planning Authority (CCRPA). Information on CTDOT, the review team, and the dates of the review is presented below.

| | |
|-------------------------------|---|
| Grant Recipient: | Connecticut Department of Transportation (CTDOT) |
| City/State: | Hartford, CT |
| Grantee Number: | 1334 |
| Executive Official: | James P. Redeker, Commissioner, CTDOT |
| Onsite Liaison: | Vicki L. Shotland, Executive Director, GHTD |
| Report Prepared By: | Milligan and Company, LLC |
| Dates of Onsite Visit: | October 26-30, 2015 |
| Review Team Members: | Cynthia Lister, Habibatu Atta, Allison Reed, Kristin S. Tighe |

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 and 37) include eligibility requirements and service criteria that must be met by ADA complementary paratransit service programs.

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

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 USC 12101-12213), including DOT 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 the transit system's ADA complementary paratransit system concerning service provision, including origin-to-destination service; eligibility, including the process used to determine who is eligible for the service; receiving and resolving complaints; and meeting the ADA complementary paratransit service criteria as specified in 49 CFR §37.131.

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

This report summarizes 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 best practices under the ADA.

4. Introduction to CTDOT, GHTD and CCRPA

The Connecticut Department of Transportation (CTDOT) provides fixed route public bus service (CTTransit) throughout the state of Connecticut, using contractors. CTDOT also contracts with local agencies and transportation providers to furnish ADA complementary paratransit service.

Until December 31, 2014, Central Connecticut Regional Planning Authority (CCRPA) was the regional planning agency for south-central Connecticut. CCRPA managed a number of local transportation programs and CTDOT contracted with CCRPA and its transportation provider for ADA complementary paratransit service in the New Britain and Bristol areas adjacent to Hartford. Effective January 1, 2015, the Connecticut Office of Policy and Management consolidated the state's regional planning regions from 15 to 9 units, eliminating CCRPA and five other organizations. Management of CCRPA's transportation programs was redistributed among other regional agencies. As a result, effective January 1, 2015, CTDOT shifted responsibility for administering New Britain and Bristol ADA paratransit service to GHTD, whose service area had somewhat overlapped CCRPA's. Six months later, CTDOT consolidated the Greater Hartford and New Britain/Bristol programs into one service. Currently, this service is managed by GHTD, with transportation provided by one contractor, First Transit.

The Greater Hartford Transit District (GHTD) is a quasi-municipal corporation composed of 16 member towns, operating under the authority of Chapter 103a of the Connecticut General Statutes. GHTD has broad powers to acquire, operate, finance, plan, develop, maintain and provide all forms of land transportation and related services, including the development or renewal of transportation centers and parking facilities. Under contract to CTDOT, GHTD has provided ADA paratransit service in and around Hartford for many years.

Located at the center of the new Capital Planning Region, GHTD's service area now covers over 800 square miles and includes an economically diverse population of over 1.2 million (2010 census). GHTD's headquarters is located at One Union Place, Hartford, CT, which also houses the agency's ADA paratransit eligibility and administrative functions.

4.1 Introduction to Paratransit Services and Organizational Structure

GHTD's ADA complementary paratransit service provides approximately 480,000 one-way trips annually. At the time of the onsite review, GHTD was using a fleet of approximately 121 lift-equipped vehicles owned by GHTD and 19 leased lift-equipped vehicles to deliver service. The vehicles are operated and maintained, under contract to GHTD, by First Transit, Inc. at GHTD's operations center at 249 Wawarme Avenue in Hartford. This is a leased facility which also houses the ADA paratransit reservations center, scheduling, dispatch, and driver training. Contracted personnel perform these functions, overseen by GHTD's management. GHTD's executive director informed the reviewers that while the Wawarme Avenue facility is adequate, it does not allow for efficient maintenance and operation of the paratransit fleet. To improve the operation, GHTD has purchased land in East Hartford for the construction of a new paratransit operations center. The new facility will include separate operations and maintenance areas. Construction of this facility commenced during the onsite review.

Several contractual changes related to provision of ADA complementary paratransit service occurred during the 18 months preceding the onsite portion of this review. CCRPA's original ADA paratransit program serving New Britain, Bristol, and other central Connecticut towns had been furnished by a single provider whose contract expired as of July 2014. CTDOT did not extend that contract, but awarded a new contract to a different provider to supply ADA paratransit service for CCRPA beginning in July 2014. The new contractor operated this service under CCRPA's management for six months. Effective January 1, 2015, CTDOT made GHTD responsible for managing the New Britain and Bristol portion of CCRPA's ADA service, which continued to be operated by the new contractor. Effective July 1, 2015, CTDOT consolidated the two services (GHTD and the former CCRPA New Britain/Bristol service) under GHTD's management and issued a single new contract for transportation provision to First Transit, Inc.

Minimal eligibility or service records, either electronic or on paper, exist to document the ADA complementary paratransit service formerly provided by CCRPA. CCRPA's website indicates that the agency has closed and refers inquiries to GHTD. In discussions with CTDOT, reviewers learned that when CTDOT contracted for CCRPA's ADA paratransit service with a new transportation provider in July 2014, most service data, both paper and electronic, did not accompany the contractor transfer.

At the time of this onsite review, service data available for the reviewers' use was limited to CCRPA's invoices and performance reports submitted to CTDOT post-July 1, 2014, and customer comment/complaint reports for the same period prepared by the incoming contractor. No information preceding July 1 was available either for GHTD or the review team regarding CCRPA's no-show program management; appeals and service suspensions; telephone management; vehicle availability; driver or staff training; or reservations, trip denials, or scheduling policies and practices.

Because CCRPA administered its own ADA paratransit eligibility determination program, some of those files were turned over to GHTD following the January 1, 2015 changeover. The review team found, however, that these materials were incomplete. They covered only certifications for individuals recently found eligible. No eligibility reporting or other files were included. Therefore, GHTD (and the review team) did not have access to older file materials or to any files for individuals found ineligible. No information was available regarding appeals of eligibility decisions, the appeal process itself (other than that provided in a CCRPA rider brochure located for the review team), visitor service, the availability of alternative-format information, or any policies, procedures or reports that CCRPA used in connection with these activities.

GHTD has made efforts to consolidate reporting and data for the two services. Most of GHTD's eligibility certification process is electronic. However, when the agency attempted to integrate the eligibility files for both services by electronically transferring CCRPA's eligibility files, managers learned that this could be achieved only through manual data entry. This was done and today all available CCRPA and GHTD eligibility materials can be accessed on line. Nonetheless, at the time of this review, GHTD was still reporting most data for the two services separately to CTDOT in order to facilitate its and CTDOT's accurate analysis of ridership, service quality, costs, and vehicle and driver usage, and to assess progress in implementing the consolidation and improving service.

GHTD's website, www.hartfordtransit.org, provides information about regional transportation opportunities and ADA paratransit service and fares, including expanded service into the New Britain/Bristol area. A link connects users to CTDOT's ADA complementary paratransit application, now in use state-wide. This site offers general eligibility and service information, an ADA paratransit riders' handbook, and brochures describing how to apply for eligibility, service during snow and extreme weather, conditional eligibility, and accessible fixed route services. The site also provides contact information, newsletters, and meeting notes for GHTD's ADA paratransit community advisory group, the ADA Participation Group Forum.

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 deficiencies 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 are described in detail below.

5.1 Scope

This review focused on whether CTDOT's ADA paratransit program operated by GHTD, and that formerly operated by CCRPA, is determining eligibility according to the service criteria specified in 49 CFR §37.123 and 125 of the DOT ADA regulations, without imposing unreasonable administrative burdens on applicants, and operating according to the service criteria specified in 49 CFR §37.131, without capacity constraints prohibited under 49 CFR § 37.131(f). The review examined GHTD's (and when feasible and appropriate, CCRPA's) eligibility standards and processes, service area, response time, fares, hours, and days of service, as well as its 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, and/or trips of excessive length; policies which cause riders to arrive late to appointments; or long telephone hold times, as defined by the transit system's established standards (or typical practices if standards do not exist).

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

- Complaint resolution and compliance information (49 CFR §§ 27.13(b) and 27.121(b))
- Nondiscrimination (49 C.F.R. §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 availability in accessible formats upon request
 - Eligibility decisions made within 21 days or presumptive eligibility granted pending a decision
 - Written notification of all decisions

- All denials or conditional eligibility determinations completed in writing with specific reasons for the decision
- Administrative appeals process for denials and conditional eligibility determinations
- Reasonable policies for suspending service to eligible riders who establish a pattern or practice of missing trips
- Complementary paratransit service for visitors (49 CFR §37.127)
- Types of service (49 CFR § 37.129)
- Service criteria for complementary paratransit (49 CFR §37.131) including:
 - Service area
 - Response time
 - Fares
 - Trip purpose restrictions
 - Hours and days of service
 - Capacity constraints
- Subscription service (49 CFR § 133)
- Training requirements (49 CFR § 173)

5.2 Methodology

FTA's Office of Civil Rights sent a notification letter dated July 30, 2015 to James P. Redeker, Commissioner, Connecticut Department of Transportation, confirming the dates of the review and requesting that information be sent to the review team in advance of the onsite visit (Attachment A).

Prior to the onsite visit, the review team examined the following service information:

- GHTD's description of how its ADA complementary paratransit service is structured
- Public information describing GHTD's ADA complementary paratransit service
- GHTD's standards or goals for on-time performance, trip denials, missed trips, paratransit trip length, on-time performance, and telephone hold times
- Public information describing CCRPA's transportation programs
- Connecticut information regarding the 2015 consolidation of Connecticut regional planning agencies, including CCRPA

As requested by FTA, CTDOT and GHTD made additional information available during the visit:

- Copies of completed driver manifests for the most recent six-month period
- Service data for the most recent six-month period for GHTD and CCRPA
- A list of complaints related to capacity issues: trip denials, on-time performance, travel time, and telephone access for GHTD's and CCRPA's service
- Eligibility data and information for the most recent 12-month period, for GHTD's and CCRPA's service

- Work shift assignments for paratransit personnel
- Complementary paratransit fleet roster
- A listing of paratransit employees showing hire and termination dates
- Daily vehicle pull-out records
- Run structure
- Vehicle pre-trip inspection and preventative maintenance forms
- Subscription trips by hour
- Training curricula for each type of complementary paratransit employee
- Procedures for providing information and communication in accessible formats

The onsite review of ADA complementary paratransit service operated by GHTD, and formerly by CCRPA, took place October 26 through 30, 2015. The review began with an entrance conference, held at 9 a.m. on Monday, October 26, at GHTD's executive offices located at One Union Place in Hartford, CT. Participating in the conference were:

Connecticut Department of Transportation (CTDOT)

- Ricardo Almeida, Transit Manager (Bureau of Public Transportation - Office of Transit & Ridesharing)
- Thomas G. Capobianco, Transportation Planner 2 (Bureau of Public Transportation - Office of Transit & Ridesharing)
- Jacqueline R. Henry-Rafiq, Transportation Supervising Manager (Bureau of Public Transportation - Office of Transit & Ridesharing)

CTTransit:

- Charlie Carson, Director of Planning & Scheduling

Federal Transit Administration (FTA)

- John Day, Program Manager for Policy and Technical Assistance, Office of Civil Rights
- Peter Butler, Deputy Regional Administrator, Region One
- Margaret Griffin, Regional Civil Rights Officer, Region One

Greater Hartford Transit District (GHTD)

- Vicki L. Shotland, Executive Director
- D.J. Gonzalez, Operations Administrator
- Pat Williams, Director of Paratransit
- Margaret Pieniazek, ADA Paratransit Coordinator
- Valerie Ellis, ADA Paratransit Services Coordinator

First Transit (GHTD contractor)

- Paul O'Brien, Region Vice President
- James Marmo, District Manager

- Randy Hendrickson, Interim GM
- Dave Larsen, Director of Maintenance, East Region
- Anand Gounder, Assistant General Manager
- Cathie Yard, District Safety Manager
- Johanna Duran, Call Center Manager

Milligan and Company, LLC

- Cynthia Lister, Lead Reviewer
- Habibatu Atta, Reviewer
- Allison Reed, Reviewer
- Kristin S. Tighe, Reviewer

Following the entrance conference, reviewers met with GHTD's senior managers to discuss the information provided in advance, as well as the information and material available on site. GHTD's policies and procedures were discussed. The review team then toured GHTD's operations center at 249 Wawarme Avenue in Hartford, CT.

For the remainder of the day, some members of the review team worked at GHTD's headquarters. They began identifying what CCRPA materials, information and files had been transferred to GHTD, or retained by CTDOT. GHTD's eligibility files were pulled for examination. Other reviewers began peak-hour observations of the trip reservation, scheduling, and dispatching processes. They interviewed the head reservations agent and met with reservations agents and schedulers to discuss procedures used to develop the final driver manifests.

On Tuesday, October 27, reviewers discussed the eligibility process with GHTD's staff and gathered CCRPA's eligibility files to examine. They observed in-person interviews being conducted and inspected the computer programs that record certification activity. Other review team members continued observations of the reservation, scheduling, and dispatching processes. The head of operations was interviewed regarding GHTD's scheduling policies, procedures, and practices. GHTD's customer service manager discussed the process in place at GHTD to record and respond to customer complaints. Some members of the review team met with CTDOT's and GHTD's managers to examine CTDOT's fixed route bus service hours, days, and service areas as compared with GHTD's ADA paratransit service days, hours and service area, and the process for synchronizing these. Other team members interviewed drivers.

On Wednesday, October 28, reviewers continued observations of GHTD's scheduling and dispatching processes, and interviewed managers regarding dispatching policies, procedures, and technology. The review team examined agency policies and procedures concerning trip reservations, response time, and negotiation of requested trip times. They discussed the scheduling system's parameters for service area definition and service hours and days. Team members researched whether there appeared to be a pattern or practice of denying a significant number of trip requests, paying particular attention to GHTD's ability to meet next-day trip requests and whether the agency used any form of trip caps or waiting lists. The review team continued its examination of eligibility files and observed the performance of in-person

eligibility interviews. GHTD's management was interviewed regarding resources, budgeting, and staffing.

On Thursday, October 29, the review team continued reviewing eligibility determination records, and continued examining completed driver manifests as a part of the verification of GHTD's on-time performance. Reviewers met with CTDOT's managers to discuss oversight of service provided by CCRPA and GHTD. The review team also tabulated GHTD's and CCRPA's customer comments and began analysis of on-board travel times.

The review team gathered and analyzed the following information:

- Comments from riders and advocates through telephone interviews and a review of comments and complaints on file at FTA and GHTD
- Reservations policies and performance standards
- Service reports prepared by GHTD and CCRPA showing the number of trips provided and the number of trips denied for the past three years
- Direct observations of the handling of trip requests by reservations agents, and interviews with reservations personnel concerning agency policies and procedures for telephone access, trip requests and capacity denials, and trip negotiation
- Direct observations of the handling of trips by dispatchers, and interviews with dispatch personnel concerning the unit's ability to identify and respond effectively to service issues as these arise

The review team compared on-board paratransit travel times with those on fixed route service, with an emphasis on paratransit trips with lengthy travel times. The reviewers continued tabulating the various data that had been gathered.

On Friday, October 30, the review team continued to tabulate the various data that had been gathered and prepared for the exit conference. The exit conference took place at 11 a.m. at GHTD's executive offices, One Union Place in Hartford, CT. Conference participants included:

Connecticut Department of Transportation (CTDOT)

- Ricardo Almeida, Transit Manager (Bureau of Public Transportation - Office of Transit & Ridesharing)
- Thomas G. Capobianco, Transportation Planner 2 (Bureau of Public Transportation - Office of Transit & Ridesharing)
- Jacqueline R. Henry-Rafiq (Bureau of Public Transportation - Office of Transit & Ridesharing)
- Sandy Infantino, Transportation Supervising Planner (Bureau of Public Transportation - Office of Transit & Ridesharing)

Federal Transit Administration (FTA)

- John Day, Program Manager for Policy and Technical Assistance, Office of Civil Rights
- Peter Butler, Deputy Regional Administrator, Region One
- Margaret Griffin, Regional Civil Rights Officer, Region One
- Richie Nguyen, Equal Opportunity Specialist, Office of Civil Rights

- Quan Lin, Equal Opportunity Specialist, Office of Civil Rights

Greater Hartford Transit District (GHTD)

- Vicki L. Shotland, Executive Director
- D. J. Gonzalez, Operations Manager
- Pat Williams, Director of Paratransit

First Transit (GHTD contractor)

- Paul O'Brien, Region Vice President
- Jim Marmo, District Manager

Milligan and Company, LLC

- Cynthia Lister, Lead Reviewer
- Habibatu Atta, Reviewer
- Allison Reed, Reviewer
- Kristin S. Tighe, Reviewer

FTA provided CTDOT with a draft copy of the report for review and response. A copy of Greater Hartford Transit District's response to the draft report is included as Attachment B.

5.3 Stakeholder Interviews

Prior to the onsite review, the review team contacted organizations serving the Greater Hartford disability community. The purpose of this activity was to invite agencies to participate in stakeholder interviews, determine whether service complaints had been filed with the transit agency, and identify practices that might require further attention and analysis during the review.

The following ten organizations were contacted to participate in these interviews:

- Gengras Center, serving students aged 5 to 21 with intellectual and developmental learning disabilities;
- Kennedy Center, providing individual instruction and planning to children and adults with disabilities for over 60 years; a recognized innovator in travel training;
- Independence Unlimited, the regional center for independent living and disability rights;
- Fresenius Dialysis, operating the nation's largest network of dialysis clinics;
- DaVita Dialysis, another major provider of dialysis services;
- National Federation of the Blind of Connecticut (NFB-CT), state affiliate of the NFB;
- Corporation for Independent Living, managing housing for seniors and persons with disabilities in the Hartford region;
- CCARC, Inc., a state affiliate of The ARC, Inc.;
- Lions Low Vision Center, serving partially sighted individuals in the Hartford region; and
- New Britain Senior Center, a community organization active in New Britain.

Representatives from seven of the agencies responded and five agreed to participate. Subsequently, a representative of NFB-CT made contact with two clients to enable reviewers to

obtain additional first-hand input about GHTD's ADA paratransit service. Reviewers were able to reach one individual.

Reviewers interviewed respondents individually using a standard set of questions. The questions asked covered the ADA eligibility process and appeals; service provision, including reservations, telephone hold times, on-time performance, and driver assistance; trip denials and wait lists; administrative burdens including requiring riders to be accompanied by personal care attendants, imposition of user fees or other application-related charges; complaints and how these are handled; and visitors using the service.

Several organizations reported no problems at all, stating that service was good and that when a problem arose, GHTD resolved it. Representatives cited few or no issues with eligibility. No issues involving visitor service, administrative burdens, or waiting lists for trips were reported. One individual stated that the no-show appeals process, for those who wished to appeal, is very easy and that many appeals are decided in the customer's favor. Interviewees cited the following service issues:

- Telephone access: Two agencies reported long waits in queue when calling GHTD's reservations unit, or problems with accessing this unit at certain times of the day.
- Rider education; reservations: Interviewees noted that their clients do not seem to understand pickup windows. Several agencies cited inconvenient pickup times but acknowledged that these fell within the 60-minute ADA trip negotiation window, or had been scheduled to meet an appointment time.
- Service provision: Two respondents mentioned that their clients reported issues with waiting for return trips (meaning that the rider is told that the driver will arrive in a certain amount of time but it often takes longer).
- Drivers; schedules: Representatives reported that clients were told they were added to the manifest as the reason why it took longer for them to be picked up. Some representatives believe the drivers do not know the routes and said that drivers are not allowed to use a GPS. *[GHTD and contractor management confirmed to reviewers that the latter statement is incorrect; drivers are permitted and encouraged to use GPS.]* One individual stated that many of the new drivers come from New Britain and are not familiar with East Hartford. She added that her service is often late on Thursdays and Fridays, and that she was told this was because there are many call outs (driver absences) on those days.

Overall, interviewees stated that the concerns they have brought to GHTD's attention have been resolved in a timely fashion. However, one individual stated she had not filed a formal complaint with the transit agency regarding service in many years, as she had once called customer service several years ago but did not receive a return call.

6. Findings and Advisory Comments

This chapter details the findings for each of the areas pertinent to the regulations found in 49 CFR Sections 27 and 37 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 GHTD's ADA paratransit system are provided, with corrective actions and a timetable to correct deficiencies for each of the requirements.

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.

Advisory comments detail recommended or suggested changes to policies or practices to ensure best practices under the ADA or otherwise assist the entity in achieving or maintaining compliance.

6.1 Comparable 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 compliance review, no deficiencies were found with the requirement to 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.

Based on the data collected and policies, procedures, and actions examined during the review, the review team observed no failure on the part of GHTD to establish an ADA paratransit eligibility process, to accept and process applications, or to provide service. Reviewers saw no evidence of attempts or actions steering applicants or potential applicants to other transportation programs. As previously discussed, CCRPA had provided ADA paratransit service in the New Britain and Bristol areas which as of January 1, 2015, with CCRPA's dissolution, was reassigned to GHTD. Effective July 1, 2015, this service was consolidated into GHTD's ADA paratransit program.

GHTD has an eligibility determination process in place. The agency's data shows that as of September 30, 2015, 7,352 individuals were registered as eligible for GHTD's ADA paratransit service, of which 3,542 were active riders. For the New Britain/Bristol program, which had then been part of GHTD for three months, 873 people were eligible to receive service, of which 412 were active riders (defined by CTDOT and GHTD as a rider who has used the service within the past six months). The review team's independent analysis of GHTD's eligibility data for the nine-month period January through September, 2015, revealed that GHTD's eligibility unit processed, on average, slightly over 200 applications per month. Of these, 64 percent were new applicants and 36 percent were recertifying riders.

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 compliance review, no deficiencies were found with the administrative burdens requirement.

GHTD does not charge a fare to new and recertifying applicants for transportation related to the application process and does not charge application or photo fees. It is unknown if CCRPA imposed administrative burdens on applicants. In examining CCRPA's January 2014 ride guide, the review team found no evidence that the agency charged fares for eligibility-related trips.

Paratransit Eligibility Standards

Requirement: 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 system 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 which prevents the individual from traveling to a boarding location or from a disembarking location

Discussion: During this compliance review, no deficiencies were found with the requirements related to the paratransit eligibility process.

GHTD has established written standards, policies and procedures for the processing, review, documentation, and reporting of eligibility activities which appear to conform to DOT ADA regulations. Reviewers observed that GHTD's eligibility determinations appeared appropriate, logical, and thorough. GHTD's application process appears systematic and well-documented. With regard to CCRPA's ADA eligibility process, as previously discussed no eligibility policies or procedures were available for reviewers to examine. Reviewers were able to examine a sample of CCRPA's eligibility files for individuals certified as ADA paratransit-eligible by that

agency, but no files for applicants found ineligible or appeals files were available. Therefore, the review team was unable to confirm the existence of standards or policies for appeals or eligibility.

As part of its onsite review, team members examined GHTD's public information materials and website information; examined eligibility materials, certification files and records, and eligibility program software; and interviewed the manager of GHTD's eligibility unit.

Determinations

During the onsite visit, reviewers examined three randomly selected groups of eligibility files and certification letters. The three samples covered CCRPA's eligibility decisions for New Britain riders made between July 2013 and December 2014, when the agency ceased operations; New Britain's eligibility decisions during the 2015 service transition period of January through September; and GHTD's eligibility decisions made during the twelve months preceding the onsite review. The review team observed the following:

Eligibility Files Sample: Review of Determinations Three ADA Paratransit Programs

| Agency | CCRPA | GHTD New Britain | GHTD |
|-------------------------------|------------------|-------------------------|-------------------|
| Total Letters Reviewed | 13 | 19 | 21 |
| Time Span | 7/2013 - 12/2014 | 1/2015 - 9/2015 | 11/2014 - 10/2015 |

| Eligibility Decision Review | Total | Percent | Total | Percent | Total | Percent |
|---|--------------|----------------|--------------|----------------|--------------|----------------|
| Decision Did Not Appear Sufficiently Logical/ Thorough | 3 | 23.08% | 1 | 5.26% | 0 | 0.00% |
| Determination Not Appropriate / Accurate | 3 | 23.08% | 1 | 5.26% | 0 | 0.00% |
| Procedural Flaws Identified | 2 | 15.38% | 2 | 10.53% | 0 | 0.00% |

For the 13 eligibility decisions made by CCRPA, team members found that three determinations (23 percent) had little or no documentation supporting the decision. Reviewers also questioned three of 19 eligibility determinations (16 percent) issued for New Britain applicants by GHTD.

After examining a group of 21 GHTD eligibility files, team members agreed that all decisions reviewed seemed appropriate and well-documented.

Eligibility Process

The review team examined GHTD's application submission and processing. GHTD's eligibility unit is housed in the agency's headquarters. Determinations are made by the two paratransit coordinators, who are GHTD's employees. The more senior of the two coordinators has participated in several Easter Seals/Project Action and National Transit Institute (NTI) ADA Paratransit Eligibility Determination workshops, as well as other ADA-related training programs.

All transit agencies in Connecticut, including GHTD, use a uniform ADA paratransit application developed in 2015 by CTDOT. Customers can obtain this application by mail, telephone request, email, or through internet download. GHTD offers in-person and telephone assistance in completing the application, which can be forwarded to the agency electronically or in paper format. The application includes a form authorizing the transit agency to obtain physician or other professional verification from an individual designated by the applicant. Applicants are asked about factors such as path of travel issues, endurance, fatigue, and adverse weather conditions.

Customers are asked to telephone GHTD approximately one week after submitting their application to make an appointment for an in-person interview. Transportation to and from the interview is provided free of charge. If the applicant has not called within two weeks to schedule an appointment, GHTD sends a reminder. In the event that completed documentation has not been returned to the agency after a month has elapsed and a follow-up has been mailed, GHTD's practice is to consider the application withdrawn and send applicants a written notice informing them of this action and inviting them to reapply whenever they wish.

GHTD's paratransit coordinators conduct the eligibility interviews. Review team members observed several of these. The agency schedules three or four interviews per day, several days each week. Upon entering, applicants are photographed for their free ID card. Non-English-speaking individuals have access to translation services for approximately 20 languages. GHTD's stated goal is to issue the determination letter within the required 21 days of receipt of a complete application.

GHTD creates electronic records whenever possible by entering eligibility interview information directly into the computer during the appointment and scanning all documents. After GHTD collects all needed information, the application is considered complete. GHTD tracks application progress to assure that the DOT ADA 21-day processing time requirement is met.

Application Volume; Certification Outcomes

The following table summarizes application volume and outcomes for GHTD's Hartford service, and for the New Britain/Bristol service that GHTD now administers. As previously discussed, data regarding CCRPA's ADA paratransit application volume and certification outcomes was not available.

| ADA Paratransit Eligibility Activity for GHTD July 1 - September 30, 2015 (Based on data provided by GHTD) | | | | | |
|--|-------------|-------------|-------------|---------------|----------|
| New Applications | 7/15 | 8/15 | 9/15 | Totals | % |
| New Appl. Rec. | 110 | 143 | 121 | 374 | - |
| Interviews Held | 55 | 47 | 62 | 164 | - |
| | | | | | |
| Applications Completed | 110 | 120 | 186 | 416 | |
| New Unconditional | 50 | 44 | 52 | 146 | 35% |
| New Conditional | 16 | 17 | 15 | 48 | 12% |
| New Temporary | 7 | 7 | 7 | 21 | 5% |
| New Ineligible | 1 | 2 | 1 | 4 | 1% |
| New Withdrawn | 36 | 50 | 111 | 197 | 47% |
| | | | | | |
| Recert Applications | 7/15 | 8/15 | 9/15 | Totals | % |
| Recert. Appl. Rec. | 58 | 74 | 77 | 209 | - |
| Interviews Held | 6 | 6 | 11 | 23 | - |
| | | | | | |
| Applications Completed | 60 | 72 | 82 | 214 | |
| Recert Unconditional | 48 | 58 | 65 | 171 | 80% |
| Recert Conditional | 10 | 11 | 15 | 36 | 17% |
| Recert Temporary | 0 | 0 | 2 | 2 | 1% |
| Recert Ineligible | 0 | 0 | 0 | 0 | 0% |
| Recert Withdrawn | 2 | 3 | 0 | 5 | 2% |
| | | | | | |
| Totals | 7/15 | 8/15 | 9/15 | Totals | % |
| Total Appl. Received | 168 | 217 | 198 | 583 | - |
| Interviews Held | 61 | 53 | 73 | 187 | - |
| | | | | | |
| Applications Completed | 170 | 192 | 268 | 630 | |
| Total Unconditional | 98 | 102 | 117 | 317 | 50% |
| Total Conditional | 26 | 28 | 30 | 84 | 13% |
| Total Temporary | 7 | 7 | 9 | 23 | 4% |
| Total Ineligible | 1 | 2 | 1 | 4 | 1% |
| Total Withdrawn | 38 | 53 | 111 | 202 | 32% |

| ADA Paratransit Eligibility Activity for New Britain Service July 1 – September 30, 2015 (Based on data provided by GHTD) | | | | | |
|--|-------------|-------------|-------------|---------------|----------|
| New Applications | 7/15 | 8/15 | 9/15 | Totals | % |
| New Appl. Rec. | 25 | 33 | 19 | 77 | - |
| Interviews Held | 11 | 11 | 18 | 40 | - |
| | | | | | |
| Applications Completed | 32 | 26 | 37 | 95 | |
| New Unconditional | 9 | 7 | 14 | 30 | 32% |
| New Conditional | 5 | 0 | 4 | 9 | 9% |
| New Temporary | 2 | 0 | 1 | 3 | 3% |
| New Ineligible | 0 | 0 | 1 | 1 | 1% |
| New Withdrawn | 16 | 19 | 17 | 52 | 55% |
| | | | | | |
| Recert Applications | 7/15 | 8/15 | 9/15 | Totals | % |
| Recert. Appl. Rec. | 2 | 3 | 9 | 14 | - |
| Interviews Held | 0 | 0 | 0 | 0 | - |
| | | | | | |
| Applications Completed | 2 | 3 | 6 | 11 | |
| Recert Unconditional | 1 | 2 | 5 | 8 | 73% |
| Recert Conditional | 0 | 1 | 1 | 2 | 18% |
| Recert Temporary | 1 | 0 | 0 | 1 | 9% |
| Recert Ineligible | 0 | 0 | 0 | 0 | 0% |
| Recert Withdrawn | 0 | 0 | 0 | 0 | 0% |
| | | | | | |
| Totals | 7/15 | 8/15 | 9/15 | Totals | % |
| Total Appl. Received | 27 | 36 | 28 | 91 | - |
| Interviews Held | 11 | 11 | 18 | 40 | - |
| | | | | | |
| Applications Completed | 34 | 29 | 43 | 106 | |
| Total Unconditional | 10 | 9 | 19 | 38 | 36% |
| Total Conditional | 5 | 1 | 5 | 11 | 10% |
| Total Temporary | 3 | 0 | 1 | 4 | 4% |
| Total Ineligible | 0 | 0 | 1 | 1 | 1% |
| Total Withdrawn | 16 | 19 | 17 | 52 | 49% |

GHTD's eligibility data indicates that each month the agency receives an average of 194 ADA paratransit applications for its Greater Hartford service. Approximately 64 percent of these are new applications, with the remainder seeking to recertify. GHTD's New Britain/Bristol service accounts for, on average, some 30 applications per month, of which 25 (83 percent) represent new applicants and five, recertifications.

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 compliance review, deficiencies were found with the requirement for accessible information.

Team members examined GHTD's public information materials, website information, and eligibility and appeals correspondence and materials. They found that, upon request, GHTD will provide eligibility and service materials in alternate accessible formats. However, the inclusion of notices announcing availability of these materials is inconsistent in agency correspondence and printed or electronic items. Reviewers observed that, while some materials contain a notice of availability upon request, others do not. For CCRPA's materials examined (limited to a riders' guide and eligibility correspondence), reviewers noted the absence of any reference to alternate-format availability.

Corrective Action Plan and Schedule: Within 60 days of the issuance of the final report, GHTD must provide to the FTA documentation that notices of the availability, upon request, of information in accessible formats have been added to: (1) the agency's website; (2) downloadable materials offered on the website; and (3) GHTD's service information and eligibility, appeal, and no-show/service suspension correspondence.

Eligibility Determinations or Presumptive Eligibility 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 the 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 compliance review, no deficiencies were found with the requirement for eligibility determinations and presumptive eligibility.

GHTD appears to process all applications in a timely manner. The reviewers' random sampling of 19 applications for New Britain/Bristol service and 21 Greater Hartford-area applications found none where determinations had been made after 21 days. The average processing time appeared to be less than one day. Examination of electronic records tracking application progress confirmed this conclusion.

When reviewing CCRPA's eligibility files, team members were unable to find eligibility standards, policies, and procedures; reports showing monitoring of application progress; evidence that the 21-day standard was met; or indications that presumptive eligibility had been granted if and when the determination process exceeded 21 days in length.

With regard to timely issuance of the certification letter, GHTD's stated policy is that applicants must be notified of their eligibility decision in writing as soon as possible after the determination has been made. The paratransit service coordinator informed reviewers that the agency's practice is to issue the certification letter immediately after determination. Reviewers found that internal evidence and documentation confirmed that GHTD usually issued the letter on the same day that the determination occurred.

Written Eligibility Determinations including Specific Reasons for Denials or Temporary or Conditional Eligibility Determinations

Requirement: Under 49 CFR 37.125(d), determinations of eligibility must be made in writing. 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 compliance review, deficiencies were found with the requirement for written eligibility determinations.

Reviewers observed that GHTD's letters for both New Britain/Bristol and Greater Hartford service granting conditional or temporary eligibility did not always provide detailed, specific reasons for the decision. In particular, this information was missing from determinations of temporary eligibility, which do not explain why someone was made eligible for a shorter period of time, rather than unconditionally eligible for the full period of eligibility. Team members found that GHTD's certification letters did uniformly and consistently include, in written notices of eligibility determination, all five required information elements (individual's name, transit provider's name, paratransit coordinator's phone number, eligibility expiration date, and conditions/limitations on eligibility, appropriately described) plus an explicit statement of the applicant's right to appeal the decision and the right to a hearing.

When examining a random sample of CCRPA's ADA paratransit determination letters, reviewers found that these did not provide explanations for decisions, nor were all required elements included.

Corrective Action Plan and Schedule: Within 60 days of the issuance of the final report, GHTD must provide to the FTA for review revised certification letters and letter templates demonstrating that the following elements are included:

- Specific, transit-based reasons for determinations of ineligibility, temporary or conditional eligibility, and for any limitations on eligibility, which reflect current DOT ADA regulatory guidance.

Recertification of Eligibility at Reasonable Intervals

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 compliance review, no deficiencies were found with the recertification of eligibility.

The review team observed that GHTD's recertification policies and process meet the same standards as its policies and processes for new applicants, and are structured to permit eligible riders adequate time to apply for recertification.

GHTD's eligibility process includes recertification at three-year intervals. GHTD notifies customers by mail 60 days prior to expiration of their eligibility. In addition, determination letters state that eligible riders who experience any health changes or changes in medical equipment that affect their ability to use public transit are welcome to recertify at any time. Unconditionally eligible riders whose disability-related condition is not expected to change or improve over time may, on a case by case basis, be recertified at five-year intervals and their accelerated recertification can involve only an updating of the customer's records.

As part of its examination of GHTD's eligibility policies, standards and procedures, public information, and eligibility records, the review team observed no differences in the handling of new and recertification applications. Eligibility standards, policies, and procedures appear to be implemented consistently whether the applicant is a new applicant or an eligible rider undergoing recertification, and notification is equally swift.

Although CCRPA's ride guide mentioned recertification, CCRPA's eligibility files examined by the review team were all for new applicants. Reviewers were unable to locate eligibility policies for CCRPA.

Administrative Appeals Process for Denials or Decisions Granting Conditional or Temporary Eligibility

Requirement: 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 authority (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 compliance review, deficiencies were found with the requirements for the administrative appeals process for eligibility.

GHTD's Policy #40, Administrative Appeals Process for Eligibility Denials and Sanctions for Paratransit Service, has remained essentially unchanged since 1991. The current policy requires written appeals and provides no explanation of the individual's right to a hearing. GHTD's Administrative Appeals Process includes three levels of appeal—first to the agency's executive director, then GHTD's board of directors, and then CTDOT's officials. The review team verified that GHTD's certification letters do provide all required information concerning appeals of eligibility determinations.

In examining CCRPA's materials reviewers found that while that agency's certification letters mentioned appeals, they merely referred recipients to the riders' handbook for more information. Reviewers could not locate any statements of policy or process, appeals files, or reports on appeals for CCRPA. As described in CCRPA's riders' guide, applicants have 60 days to request an appeal, appeals are heard by the agency's ADA paratransit advisory committee, and presumptive eligibility is awarded on day 31 following the hearing. Not enough information was available for reviewers to determine whether the CCRPA's process or practices met all DOT ADA requirements.

Reviewers examined GHTD's internal tracking procedures and reports for eligibility appeals. They found that GHTD's records appropriately document the dates of request, hearing, decision, and notification, the outcome, and potential provision of presumptive eligibility. GHTD's executive director reported the following eligibility appeals activity:

| <u>Year</u> | <u>Number of Appeals</u> |
|-------------|--------------------------|
| 2011 | 4 |
| 2012 | 0 |
| 2013 | 1 |
| 2014 | 1 |
| 2015 | 1 |

Corrective Action Plan and Schedule: Within 60 days of the issuance of the final report, GHTD must provide to the FTA for review the following:

- Revised Administrative Appeals Policy #40 and process which provide appellants the opportunity for an in-person informal hearing and offer a clear explanation of the appellant's right to present written and oral information and to be accompanied by advocates. This policy shall include appropriate separation of functions, permit but not require the appellant's presence, and shall not require a written appeal nor statement of a reason for appeal; and
- Revised written and electronic public information materials, and templates for eligibility determination letters, to reflect these changes and assure consistent wording across all documents and website information.

Complementary Paratransit for Visitors

Requirement: Under 49 CFR 37.127(d) and (e), paratransit service must be made available to visitors not residing in the jurisdiction(s) served by GHTD 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 system 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 system must accept a certification that they are unable to use fixed-route service. In no case may the transit system require a visitor to apply for or receive eligibility certification from its own paratransit system before providing this service.

Discussion: During this compliance review, deficiencies were found with the requirement for complementary paratransit service for visitors.

The review team interviewed GHTD's managers concerning visitor eligibility. GHTD's ADA paratransit ride guide, available on the website and in print, and GHTD's Policy #39 explain that the agency makes visitor service available. GHTD also documents its provision of visitor service on monthly CTDOT performance reports. However, neither the ride guide nor Policy #39 correctly describes the bases for ADA eligibility as a visitor. The Policy states, "Visitors will be asked to show or send in a copy of a completed ADA application, tracking sheet, eligibility letter, or copy of a valid ADA ID card from another region as proof of Paratransit certification." This statement does not allow visitors without eligibility from another system to present proof of address and, if not apparent, of disability.

Visitor service is not mentioned in CCRPA's ride guide and reviewers were unable to verify whether the agency had offered this service or under what circumstances.

Corrective Action Plan and Schedule: Within 60 days of the issuance of the final report, GHTD must provide to the FTA for review the following:

- revised public information (written and electronic) and GHTD's Policy #39 which permits visitors without eligibility from another system to obtain service by presenting proof of address and, if not apparent, of disability.

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 compliance review, no deficiencies were found with the requirement to provide origin-to-destination service.

GHTD describes its ADA paratransit service, in its ride guide and other public information, as door-to-door with driver assistance. The review team observed no failures to have policies and procedures in place to provide assistance from the vehicle to the first doorway for riders who, due to their disability, require additional assistance to complete the trip. Additionally, there was no evidence that GHTD charges those needing door-to-door service an extra fee. In verifying the provision of origin-to-destination service, the review team examined printed trip manifests, observed reservations and dispatch activities, and interviewed drivers. Reviewers verified that GHTD's scheduling software is not programmed to charge extra fares for door-to-door service or driver assistance. Team members observing dispatch activities found no indication that origin-to-destination service was not being provided.

CCRPA's paratransit ride guide described its New Britain/Bristol service as being provided curb to curb, stating that CCRPA "will assess if additional accommodations will be made." As previously discussed, no service materials, policies and procedures, or driver or reservations training materials were available to provide reviewers with further information. Under GHTD's management, at the time of the review, ADA paratransit service in the New Britain area was being provided on the same door-to-door basis as service throughout GHTD's service area.

6.4 Service Criteria for Complementary Paratransit

Requirement: Section 12143(c)(3) of the ADA directed the Secretary of Transportation to establish minimum criteria to establish service criteria to be used when determining whether the service provided by paratransit is comparable to the regular fixed-route system. These criteria are contained in 49 CFR 37.131, and include service area, response time, fares, hours and days of service, and prohibit restrictions on trip purpose and capacity constraints that limit the availability of service to eligible individuals. The review team assessed the transit agency's ADA paratransit system using these criteria as described below:

Service Area

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

Discussion: During this compliance review, no deficiencies were found with the requirement for service area.

The review team was able to confirm GHTD's service area boundaries, match these to CTDOT's fixed route service, and verify that service was being provided within all locations within three-quarters of a mile of CTDOT's bus routes. GHTD participates in CTDOT's service planning process and has established standard procedures for CTDOT's service planners to meet with GHTD's managers and update scheduling software parameters whenever changes in routes or days or hours of service necessitate changes in ADA paratransit service.

As previously mentioned, team members were unable to establish whether or in what respects CCRPA's service area met DOT ADA requirements. No scheduling policies and procedures, or detailed service area maps were available for examination.

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 pickup times with the rider prior to the trip being scheduled, it cannot require the rider to schedule a trip to begin more than one hour before or after the individual's desired departure time. Any greater deviation would exceed the bounds of comparability. The transit agency must have policies and procedures in place to ensure that schedulers and dispatchers do not adjust the rider's negotiated pickup time or the pickup window without the rider's consent.

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

Discussion: During this compliance review, no deficiencies were found with the response time requirement.

GHTD's reservations unit is open seven days a week from 8 a.m. until 5 p.m. Reservations are accepted one to five days in advance. GHTD's Riders Guide states that reservations for next day service will be accepted until 5 p.m. on the preceding day. Riders can schedule trips by appointment time or requested pickup time. At the time of the review, reviewers observed that GHTD complies with the regulatory requirement to accept and schedule all eligible ADA paratransit trip requests within one hour before or after the time requested, and that next-day trip requests were accepted routinely and without discussion. Team members saw no evidence of First Transit or contracted personnel adjusting a rider's negotiated pickup time or pickup window without the customer's consent.

Trip Reservations

Reviewers interviewed reservations staff and supervisors concerning ADA understanding, data entry and coding procedures, and GHTD's operational practices. They independently analyzed sample data and compared results with those provided by GHTD. During the review, team members observed the following telephone calls to the reservations unit:

**GHTD ADA Paratransit
Observations of Reservations Unit Calls
October 26 and 27, 2015**

| Types of Calls Observed | Total | Outcomes | Total |
|--------------------------------|--------------|-------------------------------|--------------|
| Reservation trip request | 8 | Scheduled | 8 |
| Cancellation | 6 | Denied due to capacity | 0 |
| Dispatch | 3 | Wait list | 0 |
| General Info (fares, etc.) | 2 | Refused by Rider | 0 |
| Used wrong phone prompt | 0 | Schedule Later | 0 |
| Other | 5 | Other | 16 |
| Total | 24 | Rider terminated trip request | 0 |
| | | Total | 24 |

Reviewers noted that all trip requests were accommodated. GHTD scheduled approximately one trip in ten using appointment time rather than pickup time. Also, of eight trip requests, six were for next-day service. Team members observed that agents were professional in communicating with callers. Contracted personnel used a written script in receiving and scheduling trip requests. In responding to trip requests, they repeated trip reservation information back to customers for confirmation, and closed with a reminder about the 30 minute pickup window.

As previously discussed, no information was available to reviewers concerning CCRPA's reservations, scheduling, or dispatch policies and procedures for its ADA paratransit service.

Scheduling

GHTD uses the Trapeze software system for trip scheduling.

GHTD's final scheduling process begins in the late afternoon of the day before service, ending at approximately 7 p.m. Team members observed that as part of their final review, scheduling staff visually scan the next day's schedules to examine vehicle loads and locations, and review individual vehicle schedules for opportunities to assign multiple trips to one vehicle (multi-load). The schedulers also identify, and resolve through rescheduling when possible, any trips longer than 60 minutes and any trips with anomalies.

Fares

Requirement: Under 49 CFR §37.131(c), ADA paratransit fares must be no more than twice the fixed route fare 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 pay the same fare as the eligible rider; no fare may be charged for a PCA.

Discussion: During this compliance review, no deficiencies were found with the requirements for paratransit fares.

Passengers pay GHTD's \$3.00 ADA paratransit fare with cash, pre-purchased tickets, or passes. This fare represents two times the CTDOT fixed route bus fare of \$1.50. Personal care attendants pay no fare; companions pay the same fare as the eligible rider they accompany. CCRPA's ride guide stated that the service accommodated PCAs at no charge and that riders were permitted to travel with one or more companions, but contained no fare information.

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 compliance review, no deficiencies were found with the requirements regarding trip purpose restrictions.

GHTD's managers and contractor personnel stated that GHTD's service operates without trip prioritization and serves all trip purposes. GHTD's public information materials do not mention trip purpose. The review team observed no prioritization of trip requests based on trip purpose, nor any evidence of prioritizing application processing based on trip purpose. None of the eligibility files examined by reviewers conditioned or restricted service based on trip purpose. Team members were unable to determine whether CCRPA's New Britain/Bristol service had prioritized or restricted trips based on trip purpose; CCRPA's ride guide is silent on this subject.

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 ADA 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 compliance review, no deficiencies were found with the requirements for hours and days of service.

GHTD's public information states that ADA paratransit service is available during all days and hours when CTTransit bus service operates. The review team compared ADA paratransit service hours with the service days and hours programmed into GHTD's scheduling software. These were then compared with CTTransit bus schedules. Reviewers identified no discrepancies. In collaboration with CTDOT's service planning managers, GHTD has established procedures for reviewing and immediately updating its ADA paratransit service hours, days and service area whenever bus schedules change.

Reviewers verified that ADA paratransit driver and dispatch shift assignments provide coverage during fixed route service hours. Review of manifests confirmed that when requested, GHTD's ADA paratransit trips are scheduled and provided when bus service is available.

CCRPA's New Britain/Bristol service did not provide service on Sundays. The information available was not sufficient to enable the review team to establish whether and to what extent the hours and days of this service mirrored CTTransit bus service.

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 Provided to an Eligible Individual

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

Discussion: During this compliance review, no deficiencies were found with the requirements for no restrictions on the number of trips provided.

The review team observed no evidence of practices or policies restricting the number of trips an eligible individual is provided. GHTD's stated policy regarding service use is that ADA paratransit service is provided on an unrestricted basis. Public information materials do not mention any limits on the number of trips provided. During repeated observations of GHTD's reservations, scheduling and dispatch units, the review team found no policy, formal or informal, limiting or capping the number of trips an individual may take and no indications of such restrictions.

With regard to the New Britain/Bristol service formerly operated by CCRPA, that agency's ADA paratransit rider's guide did not mention any restrictions on the number of trips eligible riders could receive.

No Waiting List for Access to the Service

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

Discussion: During this compliance review, no deficiencies were found with the requirement for no waiting list(s) for non-subscription service.

GHTD's management stated that the agency's reservations, scheduling and dispatch process does not include the use of waiting lists for service. The review team's observations and the agency's data indicate that eligible trip requests are accommodated within the required one hour before or after the requested time. Whether CCRPA's service used waiting lists for non-subscription New Britain service is unknown; this practice is not mentioned in the rider's guide, and the review team was unable to examine service policies or reservations and dispatch procedures or reports.

No Substantial Numbers of Significantly Untimely Pickups for Initial or Return Trips

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 compliance review, no deficiencies were found with the on-time performance requirements.

¹ 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 paratransit system.

Based on the data and documentation provided and observations made, the review team concluded that GHTD has established standards for timely pickups and appears to meet or exceed its goal. The agency's stated on-time performance standard for pickups is 90 percent. GHTD considers on-time pickups to be within the 30-minute pickup window (+/- 15 minutes) or earlier.

Reviewers examined on-time performance data provided by GHTD, comparing this with the results of independent analysis. It indicated that GHTD's vehicles arrived at the pickup location at or before the negotiated pickup time, or within 15 minutes thereafter, over 90 percent of the time. GHTD has not established an on-time performance standard for trips scheduled according to appointment time.

| GHTD: Reported On-Time Performance Calendar Year 2015 | | | | | | |
|--|------------------------|--|--------------------------------|----------------|--------------------|---------------|
| Month (2015) | On-time Percent | | Within 30 minute window | On Time | Total Trips | Late** |
| January | 93.05% | | 27,449 | 27,449 | 29,499 | 2,050 |
| February | 91.31% | | 25,481 | 25,481 | 27,905 | 2,424 |
| March | 92.75% | | 32,755 | 32,755 | 35,315 | 2,560 |
| April | 93.40% | | 33,154 | 33,154 | 35,498 | 2,344 |
| May | no data provided | | | | | |
| June | 92.96% | | 31,744 | 31,744 | 34,149 | 2,405 |

When a vehicle arrives early, GHTD requires the driver to notify dispatch and wait until the pickup window commences. Then, if the customer is not ready to board, a dispatcher will telephone the rider or facility to inform them that the vehicle is waiting and establish whether the rider is ready or available. Only at this point may dispatch authorize the driver to leave the site. First Transit personnel stated that if a vehicle arrives before the "ready time" (pickup) window begins (more than 15 minutes early), the rider has no obligation to board until the pickup window commences, 15 minutes before the negotiated time. Driver training and dispatcher procedures emphasize that patrons must not be required, expected, or pressured to board early.

Through dispatch observation, reviewers independently cross-checked GHTD's on time performance data. In addition, using driver manifests, the team collected a base sample of 75 randomly selected trips from January through July 2015. The sample included individuals using wheelchairs, as well as ambulatory riders, and examined travel within and between New Britain, suburban areas, and downtown Hartford. This analysis showed that for trips requested by pickup time, vehicles picked up the customer within the 15-minute arrival window or early 91 percent of the time.

| Calculated On-time Performance | | |
|---------------------------------------|-----------|-------------|
| Times | P/U | P/U % |
| After the Negotiated P/U Time | | |
| >30 minutes late | 1 | - |
| 16-30 minutes late | 1 | - |
| 1-15 minutes late | 5 | - |
| Exactly On time | 3 | - |
| In window (-15/+15) | 64 | - |
| Prior to the Negotiated P/U Time | | |
| 1-15 minutes early | 1 | - |
| 16-30 minutes early | 0 | - |
| >30 minutes early | 0 | - |
| | | |
| Total trips in Sample | 75 | 100% |
| In window or early | 68 | 91% |

Further analysis also showed that among the sampled trips, 22 individuals using wheelchairs experienced the same level of or better on-time performance (91 percent vehicle arrival in the window or early) as did 53 riders who were ambulatory (48 arrivals in the window or early; five late; 91 percent on-time performance). The randomly selected sample did not include any trips scheduled by appointment.

No Substantial Numbers of Trip Denials or Missed Trips

Requirement: Under 49 CFR 37.131(f)(3)(i)(B), the transit agency must provide ADA paratransit service without substantial numbers of trip denials or transit agency missed trips. A denial occurs whenever a transit system 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) of the DOT ADA regulations, the transit system 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 compliance review, no deficiencies were found with the requirements that ADA paratransit service be provided without substantial numbers of trip denials or missed trips.

Reviewers found that GHTD has established standards, policies, and procedures for the handling and documentation of trip denials. It was observed that GHTD consistently accommodated eligible trip requests within one hour before or after the requested time.

Based on the information available, the review team was unable to determine whether the New Britain/Bristol service operated by CCRPA experienced or documented capacity denials.

The following table, using data provided by GHTD, summarizes trips requested, scheduled, and denied for the six month period January – June 2015.

| GHTD: Analysis of Trip Request Outcomes for a Six Month Period | | | | | | | |
|---|---------------------|---------------------|---------------------|---------------------|---------------------|----------------------|--------------|
| January to June 2015 | | | | | | | |
| | Jan 2015 | Feb 2015 | Mar 2015 | Apr 2015 | May 2015 | June 2015 | Total |
| Trips Requested | 40,365 | 37,298 | 43,053 | 43,173 | 42,194 | 41,740 | 247,823 |
| Denied | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Scheduled | 40,365 | 37,298 | 43,053 | 43,173 | 42,194 | 41,740 | 247,823 |
| Customer No Shows | 174 | 392 | 368 | 295 | 285 | 264 | 1,778 |
| Missed Trips | 28 | 64 | 44 | 35 | 43 | 28 | 242 |
| Trips Provided | 31,595 | 29,958 | 38,246 | 38,606 | 37,440 | 37,406 | 213,251 |

ADA Trip Denials

To meet its obligations under the DOT ADA regulations, a transit agency must count the following incidents as ADA trip denials, whether during reservations or scheduling:

- If the next-day ADA paratransit trip cannot be provided at all
- If the rider *accepts* a pickup time more than one hour before or after the requested time
- If the rider *refuses* a pickup time more than one hour before or after the requested time
- If only one leg of a round trip can be reserved and the customer declines to make the trip, *two trips* have been denied. If only one leg of a round trip can be reserved and the customer accepts the trip, *one trip* has been denied.

GHTD defines an ADA trip denial as any inability to accommodate (schedule) an ADA-eligible trip request within one hour before or after the requested pickup time. At the time of this review, GHTD had documented no capacity denials for many years. Members of the review team observed no failures by reservations staff to accommodate and record all eligible trip requests.

Missed Trips

GHTD has no written missed trips goal. Administrators informed reviewers that the agency's objective is no missed trips. Trips that are cancelled or no-showed after the end of the pickup window are not recorded as the fault of the rider and customers are not penalized for these.

Reviewers' discussions with drivers, dispatchers and GHTD's management confirmed their understanding that if a vehicle does not arrive within the pickup window, the customer has no obligation to wait for the vehicle and must not be assessed a no-show or late cancellation.

Analysis of agency data showed missed trips accounted for less than one percent of GHTD's total scheduled rides.

The GHTD riders' guide states that customers will not be charged no-shows for missed trips that were not the rider's fault. Review team members examined driver manifests for a sample week to determine if missed trips, no-shows, and late cancellations had been properly coded. Reviewers compared the date and time with the pickup window of each trip request. As discussed below in Section 6.6, *No-Shows*, reviewers found that the drivers' coding for no-shows was appropriate in 83 percent of the sample trips. The coding was subsequently checked by staff before no-shows were calculated.

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 calculated using the agency's trip planner, 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 compliance review, no deficiencies were found with the requirement that ADA paratransit service be provided without substantial numbers of trips with excessive trip lengths.

GHTD demonstrated that it tracks trip length and that the scheduling software appears to reliably predict on-board travel times. GHTD's staff have established procedures to identify trips of excessive length and, whenever feasible, take corrective measures during final schedule review on the day before service is provided, as well as on the day of service.

GHTD's standard for trip duration is that, as stated in its riders' guide, all paratransit trips are scheduled for approximately the same travel time as that trip would require using fixed route service. GHTD uses CTTTransit's web-based fixed route trip planning software to run weekly trip length comparisons. Managers commented that, given GHTD's operating environment and with the addition this year of one-seat rides from Hartford to New Britain, peak-hour trips can be lengthy at times.

During interviews, contractor supervisors confirmed that they are aware of which trips are likely to require longer travel times, and are on the lookout for these. They said that during final

review they scan the next-day schedules for trips that exceed 60 minutes and, if possible, move trips and adjust run schedules to reduce time on vehicles.

A review of customer comments showed few complaints about lengthy rides. To determine independently if there were a substantial number of significantly long rides on GHTD's paratransit service relative to trips made on CTTransit's fixed route system, reviewers randomly selected ten of GHTD's trips of more than 60 minutes in length from a computer-generated list. Using actual travel times obtained from vehicle manifests, these rides were compared with the same trip taken on fixed route service using CTTransit's online trip planner, with walk and wait times included. Two paratransit rides were shorter, one markedly shorter, than the same trip using fixed route service. Three showed almost the same travel time, with a difference of less than 10 minutes. The remaining five exceeded fixed route travel time by 20 to 36 minutes.

| GHTD: Results of Trip Length Comparison Selected Trips Exceeding 60 Minutes January through July 2015 | | | |
|--|--|---|---|
| Trip ID# | Estimated Trip Length in Minutes on Fixed Route | Recorded Trip Length in Minutes on Paratransit | Paratransit - fixed route: Difference in minutes |
| 5 | 120 | 62 | -58 |
| 8 | 66 | 62 | -4 |
| 3 | 54 | 60 | 6 |
| 10 | 54 | 62 | 8 |
| 7 | 54 | 63 | 9 |
| 4 | 77 | 97 | 20 |
| 9 | 51 | 75 | 24 |
| 2 | 61 | 87 | 26 |
| 1 | 47 | 80 | 33 |
| 6 | 48 | 84 | 36 |

No Operational Patterns or Practices Limiting the Availability of Service to ADA Eligible People

Requirement: This section also 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 compliance review, deficiencies were found with the requirements that ADA paratransit service be provided without the use of any operational patterns or practices that significantly limit the availability of service, including telephone access and driver availability.

The review team's test calls and analysis of sample telephone data for the reservations unit indicated long hold times. GHTD's telephone performance standards do not address hourly variations in phone queue lengths.

GHTD appears to have an adequate number of vehicles to meet the current expressed demand for ADA complementary paratransit service. However, the contractor's driver roster may be insufficient to serve current or increased passenger volumes. GHTD's senior administrators and contractor management expressed concerns to the review team about diminished driver availability in the period since the New Britain/Bristol service was folded into GHTD's service. Reviewers observed that GHTD, the service contractor, and CTDOT are actively monitoring and managing this situation. At the time of the onsite review, the contractor had recently made leadership changes in its GHTD service and accelerated its driver recruiting and training efforts.

Neither service data, nor performance standards, policies, or procedures were available for CCRPA's New Britain/ Bristol service. Therefore, the review team was unable to establish whether CCRPA's ADA paratransit service complied with DOT ADA requirements.

GHTD Telephone System

GHTD uses a Mitel telephone system with Total Communication hardware and software. Eight incoming trunk lines serve Reservations, which has eight work stations. Each reservation station contains a telephone and computer terminal. Five departments use the phone system, including customer service, eligibility, and dispatch. The contractor's reservations supervisor told reviewers that plans are under way to add lines.

System components include an Automated Call Distribution (ACD) system and digital recording capability. Installed in March 2013, the phone system includes unit components plus administrative features, after-hours menu, recording, reporting, Spanish language capability, and remote access features. The system also features an Interactive Voice Response (IVR) process, Info Voice Email (IVE), and Info Voice Text (IVT). The IVE and IVT systems provide instant trip schedule notification or vehicle arrival information for customers who have a valid email address or access to text messaging and choose to register to use these features. Software allows the supervisor to see and follow on the screen in real time whatever actions a reservation agent is performing in the scheduling software. The Reporter Pro program generates daily call reports and historical call information. In assessing agents' performance, the supervisor also employs the call recording program, using a quality assurance form that monitors tone, knowledge, and how the agent assists the caller.

GHTD's telephone system appears to have adequate capacity to handle incoming calls for trip requests, and good system management capabilities. Nonetheless, in conducting observations in the reservations unit, team members observed that reservations agents at times seemed to have five or six calls in queue. GHTD's managers informed reviewers that the call center has a staff of seven agents plus one supervisor, and that there are usually six individuals on duty. The

reservations supervisor told team members that she schedules staff and moves work hours in an attempt to address gaps in coverage. The reservations unit is advertised as being open to the public from 8 a.m. to 5 p.m., seven days a week, with, according to the supervisor, six or seven agents typically scheduled for Sunday through Friday and three on Saturday. The reservations line is held open until the queue has been cleared. When asked how she monitors service during the day and makes corrections to address phone capacity issues, the supervisor responded that she checks the system reports and then determines if additional staff is needed from dispatch to cover some of the reservation lines. She will also assist in answering phones as needed. Additionally, she reported that the system can overflow to the customer service department, but only during specific, limited times. Reviewers did not observe phones ringing in other units as overflow after a certain length of time in queue.

GHTD has established the following performance standards for paratransit reservations and dispatch calls:

- 92 percent of all incoming reservations and dispatch calls shall be answered with a live operator within one minute.
- “Hold times cannot exceed 2 minutes.”
- “Abandoned calls must be less than 5 percent .”

The review team’s analysis of available data indicates these standards are not achieved. Also, no standard is included covering the remaining eight percent of calls not answered within one minute.

It should be noted that FTA discourages the use of performance standards based on *average* hold times over a defined period because doing so can mask poor performance at certain times. If using average hold times, however, it is important to narrow the period within which the averages are calculated. Measuring averages over an entire day, week, or month can obscure any issues. FTA recommends measuring averages over hourly periods. The standard for average hold times would then be set as a minimum percentage (e.g., X percent) of hours for which the average hold times are shorter than one threshold (e.g., one minute), and a second (higher) percentage (e.g., Y percent) of hours for which the average hold times are shorter than a second (higher) threshold (e.g., three minutes).

The review team analyzed telephone performance data generated by the ACD system for the sample weekdays Monday through Friday, September 14-18, 2015, for GHTD’s reservations unit, including both GHTD’s and New Britain/Bristol’s services. These show unacceptable levels of abandoned calls, and long waits in phone queues most of the day, but particularly in late afternoon and on Mondays and Tuesdays.

**GHTD Reservations Unit Telephone Activity
Sample Week of September 14-18, 2015
Combined GHTD and New Britain/Bristol Service**

| | Monday 9/14/2015 | Tuesday 9/15/2015 | Wednesday 9/16/2015 | Thursday 9/17/2015 | Friday 9/18/2015 |
|--------------------------------------|-----------------------------|------------------------------|--------------------------------|-------------------------------|-----------------------------|
| Total Calls Received | 1174 | 785 | 592 | 645 | 576 |
| Calls Answered | 818 | 632 | 565 | 568 | 532 |
| Calls Abandoned | 356 | 153 | 27 | 77 | 44 |
| % of total calls | 30% | 19% | 5 % | 12% | 8% |
| Avg queue time (mins:sec) | 00:05:56 | 00:03:59 | 00:01:19 | 00:02:23 | 00:01:51 |
| Max avg queue time (mins:sec) | 00:10:08 | 00:06:28 | 00:02:07 | 00:03:43 | 00:04:45 |

**GHTD Reservations Unit Telephone Activity
Sample Week of September 14-18, 2015
Combined GHTD and New Britain/Bristol Service**

AVERAGE TIME IN QUEUE/ON HOLD BY HOUR

| | Monday 9/14/2015 | Tuesday 9/15/2015 | Wednesday 9/16/2015 | Thursday 9/17/2015 | Friday 9/18/2015 |
|--------------------------------|-----------------------------|------------------------------|--------------------------------|-------------------------------|-----------------------------|
| 8:00-9:00 | 00:01:01 | 00:02:23 | 00:02:01 | 00:02:28 | 00:01:41 |
| 9:00-10:00 | 00:04:01 | 00:04:19 | 00:00:56 | 00:01:11 | 00:00:35 |
| 10:00-11:00 | 00:06:18 | 00:02:57 | 00:01:31 | 00:02:06 | 00:01:03 |
| 11:00-12:00 | 00:06:18 | 00:01:06 | 00:00:48 | 00:01:54 | 00:00:27 |
| 12:00-13:00 | 00:04:57 | 00:04:20 | 00:02:07 | 00:02:04 | 00:01:16 |
| 13:00-14:00 | 00:10:08 | 00:04:06 | 00:00:49 | 00:02:28 | 00:01:11 |
| 14:00-15:00 | 00:05:30 | 00:02:18 | 00:00:47 | 00:02:04 | 00:01:59 |
| 15:00-16:00 | 00:05:50 | 00:05:46 | 00:01:22 | 00:03:00 | 00:02:10 |
| 16:00-17:00 | 00:07:23 | 00:06:28 | 00:01:33 | 00:03:43 | 00:04:45 |
| Average daily hold time | 00:05:56 | 00:03:59 | 00:01:19 | 00:02:23 | 00:01:51 |

In preparing for the onsite review, team members conducted and documented 41 calls to the GHTD's reservation unit during October. Based on the sampling, one call (representing two percent of the calls) encountered a busy signal; 40 calls (97 percent) went into the queue. Thirteen calls (32.5 percent) were answered in less than 60 seconds; three calls (7.5 percent) were answered in 60 to 90 seconds; 23 calls (57.5 percent) were answered after waiting more than 90 seconds. No calls were answered directly. When time in queue was further examined, the following was observed:

- Mondays: Queue lengths observed ranged from zero seconds to over six minutes. Additionally, three Monday calls were placed on a secondary hold, which occurs when a call is picked up and an individual identifies the reservations unit and asks the caller to please wait. After the secondary hold, these calls remained in the queue for more than one minute, four minutes, and eight minutes respectively.

- Tuesdays: Queue lengths ranged from 10 seconds to over nine minutes.
- Wednesdays: Queue lengths ranged from 10 seconds to over 13 minutes.
- Thursdays: Queue lengths ranged from 10 seconds to almost seven minutes.
- Fridays: Queue lengths ranged from 90 seconds to over eight minutes

In analyzing these test calls, reviewers noted that long waits in the phone queue appeared to occur at all times of day.

GHTD Computer Scheduling Software

At the time of the review, GHTD was deploying several software scheduling systems simultaneously. GHTD uses the Trapeze eligibility, reservations and scheduling, dispatch, fleet management, no-show and suspension, and agency modules. The agency continues to use its Trapeze software for scheduling and dispatching its Hartford service, supplemented by InfoManager software which connects with AVL, GPS and MDTs on all GHTD vehicles.

As of July 1, 2015, with the consolidation of New Britain/Bristol's service into GHTD's service, GHTD assumed leases for Novis software and other communications and computer equipment previously used in the provision of service for this program. At the time of the review, GHTD informed reviewers that the agency was in the midst of transitioning data from Novis to Trapeze, and intends to phase out use of the Novis software as soon as possible. For the leased vehicles being used for New Britain service, a third system involving tablet computers plus Stratagen scheduling and reporting is being used. When all vehicles are owned by GHTD and the leased vehicles are no longer in use, the latter practice will end.

Several weeks before the onsite review, GHTD successfully completed integrating all the customer records for both Hartford and New Britain services into one Trapeze file. This task required manual entry of all New Britain customer data after it was determined that GHTD could not make use of technology to transfer the information from Novis.

Vehicle Fleet; Vehicle Availability

Contractors and GHTD's managers stated that when the incoming new provider took over the New Britain/ Bristol service in July 2014, they learned that the preceding contractor had operated this service for CCRPA using 13 vehicles. With increased ridership, 19 vehicles are now required to supply the service.

The Transit Improvement Program (TIP) for Greater Hartford includes a three-year vehicle replacement program for GHTD that would include purchase of at least 35 vehicles per year. Due to ridership increases in New Britain/Bristol service, particularly since GHTD began managing the program in January 2015, GHTD has also decided to retain six vehicles it had planned to retire and replace this season. GHTD owns and supplies the approximately 121 vehicles and on-board vehicle computer systems for its Greater Hartford ADA paratransit service, while the contractor owns the DriveCam units installed on each vehicle. At the time of the review, as mentioned, GHTD was leasing the vehicles necessary to provide New Britain/Bristol service while awaiting the arrival of 19 new GHTD-owned vehicles which would increase the agency's fleet to a total of approximately 147 lift-equipped vehicles.

To determine if there are presently sufficient vehicles available to cover scheduled runs with an adequate supply of spare vehicles, the review team examined GHTD's run structure and daily vehicle availability records. GHTD and contractor managers stated that to meet weekday peak pullouts currently require approximately 124 vehicles for Greater Hartford service and 19 vehicles for New Britain/Bristol service, plus spares. It appears that GHTD typically has sufficient vehicles on hand to cover the number of runs created, but that driver availability remains a concern.

Driver Availability

At the time of the review, contractor management told the review team that they employed 192 drivers for GHTD's service, almost all of whom were full-time. This total includes 18 part-time drivers (nine percent). The contractor's goal is to achieve a total of 205 drivers. The contractor representative noted that driver availability has been a significant challenge, requiring intensified recruiting and training.

Senior contractor management told the review team that the company had already taken a number of corrective actions. In September 2015, the contractor accelerated the pace of its training program, conducting driver training classes for new hires each week. (As driver availability has improved somewhat, classes are being run every two weeks.) In addition, the company increased overtime availability to cover any open runs (at its expense, not GHTD's). It also conducted an intensive analysis of all vehicle routes and schedules to identify opportunities to increase efficiency and productivity. Finally, as noted later in this report, the contractor made changes to its Hartford management and began a national search for a seasoned general manager for the program.

Meanwhile, GHTD continues to monitor driver availability closely. Each Friday the contractor must prepare a staffing report for GHTD, which CTDOT also reviews. GHTD continues to impose liquidated damages for nonperformance.

To establish if there is a workforce adequate to cover scheduled runs and sufficient backup on the day of service so that the contractor would not have to resort to covering driver absences using supervisors as emergency drivers, the review team selected for analysis two sample weeks for each service. The reviewers used a range of dates to illustrate changes in service provision.

For the New Britain/Bristol service, reviewers examined records for the sample weeks of September 15-19, 2014 and April 13-17, 2015. The September data represents the period approximately 10 weeks after the contractor began providing this service. (Note the increase in the number of runs). The April records show service three months after GHTD had assumed responsibility for managing the New Britain program, but before the July 1, 2015 service consolidation.

Reviewers analyzed Greater Hartford service records for the sample weeks of April 13-17, 2015 and September 21-25, 2015. Again, the April date occurs after GHTD began managing New Britain/Bristol service, while planning was under way for the July 1 consolidation. The

September data provides a snapshot of service less than three months after consolidation, but after the contractor had undertaken corrective actions.

These records illustrate daily driver availability and run coverage, showing the number of runs created each day, the open runs due to driver call-outs, and the spare and standby/“extra board” drivers available to cover open runs that day. This data suggests that using spare and extra-board drivers alone, GHTD has not always been able to cover runs, and that driver recruitment merits continued attention.

New Britain Driver Availability and Run Coverage:

Sample Week September 15 - 19, 2014

| | Number of Runs Assigned | Split/straight Runs | Number of Runs Uncovered | Extra Board (On-Call) Drivers | Number Supervisors Used to Cover Runs |
|------------------------|--|--------------------------------|---|--|--|
| Monday 9/15/2014 | 16 | 11 | 0 | 0 | 0 |
| | | 5 | | | |
| Tuesday 9/16/2014 | 16 | 11 | 0 | 0 | 0 |
| | | 5 | | | |
| Wednesday 9/17/2014 | 16 | 9 | 0 | 0 | 0 |
| | | 7 | | | |
| Thursday 9/18/2014 | 16 | 9 | 0 | 0 | 0 |
| | | 7 | | | |
| Friday 9/19/2014 | 16 | 9 | 0 | 0 | 0 |
| | | 7 | | | |

**New Britain Driver Availability and Run Coverage:
Sample Week April 13 - 17, 2015**

| | Number of Runs Assigned | Split/straight Runs | Number of Runs Uncovered | Extra Board (On-Call) Drivers | Number Supervisors Used to Cover Runs |
|------------------------|--|--------------------------------|---|--|--|
| Monday 4/13/2015 | 17 | 10 | 0 | 0 | 0 |
| | | 7 | | | |
| Tuesday 4/14/2015 | 16 | 10 | 0 | 0 | 0 |
| | | 6 | | | |
| Wednesday 4/15/2015 | 19 | 9 | 0 | 0 | 0 |
| | | 10 | | | |
| Thursday 4/16/2015 | 18 | 11 | 0 | 0 | 0 |
| | | 7 | | | |
| Friday 4/17/2015 | 18 | 10 | 0 | 0 | 0 |
| | | 8 | | | |

**GHTD Driver Availability and Run Coverage:
Sample Week April 13 - 17, 2015**

| | Number of Runs Assigned | Split/straight Runs | Number of Runs Uncovered | Extra Board (On-Call) Drivers | Number Supervisors Used to Cover Runs |
|------------------------|--|--------------------------------|---|--|--|
| Monday 4/13/2015 | 116 | 47 | 12 | 4 | 0 |
| | | 69 | | | |
| Tuesday 4/14/2015 | 118 | 40 | 8 | 5 | 3 |
| | | 78 | | | |
| Wednesday 4/15/2015 | 117 | 36 | 11 | 5 | 0 |
| | | 81 | | | |
| Thursday 4/16/2015 | 126 | 40 | 8 | 4 | 1 |
| | | 86 | | | |
| Friday 4/17/2015 | 124 | 47 | 2 | 3 | 0 |
| | | 77 | | | |

**GHTD Driver Availability and Run Coverage:
Sample Week September 21 - 25, 2015**

| | Number of Runs Assigned | Split/straight Runs | Number of Runs Uncovered | Extra Board (On-Call) Drivers | Number Supervisors Used to Cover Runs |
|------------------------|--|--------------------------------|---|--|--|
| Monday 9/21/2015 | 110 | 39 | 12 | 4 | 0 |
| | | 71 | | | |
| Tuesday 9/22/2015 | 110 | 40 | 8 | 5 | 3 |
| | | 70 | | | |
| Wednesday 9/23/2015 | 119 | 51 | 8 | 12 | 2 |
| | | 68 | | | |
| Thursday 9/24/2015 | 124 | 48 | 9 | 13 | 1 |
| | | 76 | | | |
| Friday 9/25/2015 | 123 | 47 | 4 | 10 | 0 |
| | | 76 | | | |

Planning; capital and operating budgeting

Review team members met with GHTD's executive director and director of fiscal and administrative services to discuss how the organization plans and budgets for ADA paratransit services each year. GHTD's ADA paratransit budget is determined by projected passenger trips, vehicle productivity, and planning for technology, communications equipment, and vehicle upgrades. It also reflects the availability of funding. GHTD's capital budget includes provision for a new paratransit operations center, now in construction, and vehicle purchases. The organization appears committed to investing in excellent service provision, particularly with the addition of New Britain/Bristol service in 2015.

GHTD ADA Paratransit Program - Capital & Operating Budget Information

| Operating Budget: | FY13 | FY14 | FY15 | FY16 |
|-----------------------------------|--------------|---------------|--------------|--------------|
| Greater Hartford Transit District | \$25,600,020 | \$ 31,323,844 | \$37,822,207 | \$48,025,563 |
| ADA Paratransit Program | \$13,288,855 | \$ 13,792,715 | \$14,019,437 | \$16,619,495 |
| | <i>B</i> | <i>C</i> | <i>D</i> | <i>E</i> |
| ADA Paratransit ridership | 347,626 | 443,759 | 445,645 | - |

| Capital Budget: | FY13 | FY14 | FY15 | FY16 |
|--|--------------|--------------|-------------|--------------|
| New ADA Paratransit operations facility | \$ 2,428,520 | \$ 3,870,790 | \$ 900,000 | \$15,162,520 |
| Vehicles replacement | \$ 1,656,218 | \$ 740,436 | \$ 714,544 | \$ 3,024,000 |
| Admin capital & support equipment, incl. vehicle radios and technology | \$ 214,609 | \$ 200,000 | \$ 150,000 | - |

(B) includes \$495,000 for radio & fleet maint; \$75,000 for software & IT support.

(C) includes \$380,000 for radio & fleet maint; \$140,000 for software & IT support.

(D) includes \$434,000 for radio & fleet maint; \$165,000 for software & IT support.

(E) includes \$460,000 for radio & fleet maint; \$171,000 for software & IT support.

Corrective Action Plan and Schedule: With regard to telephone access, within 60 days of the issuance of the final report GHTD must provide to the FTA for review the following:

- a list of corrective measures being taken to resolve long waits in reservations queues and the high rate of abandoned calls, and address evident staffing issues;
- revised telephone performance standards, policies, and procedures for the handling of calls to the reservations unit; and
- a list of actions being implemented to assure that managers, reservations and dispatch staff, and supervisors (both contracted and GHTD employees) understand these requirements, and to assure that compliance is being monitored and enforced.

With regard to driver availability, within 60 days of the issuance of the final report, GHTD must provide to the FTA for review the following:

- monthly reports showing, by week, totals for: full and part-time drivers available, vehicles needed to meet weekday peak hour requirements, drivers hired, and drivers in training; and
- a list of administrative and operational actions proposed or being taken to address issues of driver availability.

6.5 Subscription Service

Requirement: Under 49 CFR 37.133, transit agencies are 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 compliance review, no deficiencies were found with the requirements concerning the provision of subscription trips.

The review team calculated that for the six month period ending September 30, 2015, subscription service represented 43 to 46 percent of GHTD's ridership, averaging 44 percent—less than 50 percent. GHTD has a written policy and performance standard of zero capacity denials. Reviewers observed no indications suggesting that GHTD is issuing capacity denials and not recording these.

6.6 Reasonable Policies for Proposed Service Suspensions for Missing Scheduled Trips and the Right to Appeal

Requirement: Section 37.125(h) of the DOT ADA regulations states that transit agencies “may establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit service to ADA eligible individuals who establish a pattern or practice of missing scheduled trips.” FTA has permitted transit systems to regard late

cancellations as no-shows if and only if they have the same operational effect on the system as a no-show, generally less than 1 - 2 hours of the scheduled trip time.

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

Discussion: During this compliance review, deficiencies were found with the requirements concerning the transit agency's no-show and late cancellation policies, and the reasonableness of proposed sanctions. As outlined in GHTD Policy #30 (No Shows and Late Cancellations), the conditions triggering service suspensions for excessive no-shows must be clarified to assure reasonableness and minimize confusion. As written, the policy indicates that a person making 10 trips in a month could face suspension after two no-shows in two months, which does not represent a pattern or practice. In addition, as discussed earlier, deficiencies were found with GHTD's Administrative Appeals Policy #40: The agency makes its administrative appeals process available to individuals facing suspension for no-shows; Policy #40 requires written appeals and provides no explanation of the individual's right to a hearing.

With regard to riders using CCRPA's earlier New Britain and Bristol service, the review team found that CCRPA's no-show policy as described in CCRPA's ride guide did not consider frequency of travel.

GHTD's Policy #30 considers a trip to be a no-show when the vehicle arrives within the pickup window, waits five minutes, and the rider still has not arrived. A late cancellation occurs when the rider cancels less than two hours before the scheduled pickup time. Information provided to riders states that customers will not be penalized for no-shows or late cancellations that are beyond the customer's control, specifically allows for delayed returns from medical appointments, and urges riders to call and discuss with staff any no-show they wish to question or have researched. The policy includes a provision for "90-day look-back", which agency managers explained is a review of the individual's trip history over the previous 90 days to ascertain whether and how frequently the individual no-shows. Managers stated that if the individual appears to no-show infrequently or only under circumstances beyond the rider's control, no sanctions will be imposed. The rider handbook warns passengers that the agency may suspend service for excessive, repeated no-shows, subject to the following procedures and policies:

- Frequency of use; establishing a pattern or practice: Policy #30 states that riders "may receive a warning or suspension only if they have booked a minimum of 10 trips or more and have no showed or late-cancelled at least 10 percent of those trips", subject also to an initial review of service use over a "90-day look-back" period.

- “90-day look-back”: A review of the rider’s ridership during the preceding 90 days to examine the rider’s service use and ascertain whether confirmed no-shows appear to be frequent or infrequent.
- Re-examination of service use: Before issuing a warning or suspension notice, GHTD staff is required for a second time to review all the customer’s no-shows and late cancels to verify that drivers and dispatchers followed all procedures correctly, and to confirm that no-shows beyond the rider’s control or that were imposed in error have been removed.
- Phasing of sanctions:
 - First violation – warning letter
 - Second violation – 7-day service suspension
 - Third violation – 14-day service suspension
 - Fourth violation – 21-day service suspension
 - Fifth violation – 28-day service suspension

The wording of Policy #30 requires clarification to assure that it is reasonable and understandable. The policy contains no provision for a threshold number of violations beyond which sanctions can be imposed (e.g., after four confirmed no-shows in one month). Also, it does not specify the period to which the policy applies (e.g., one month, two months, or one year). Nor does it state whether the phasing of sanctions is limited to a calendar year or is external (that is, can no-shows incurred two years ago, combined with the current month’s results, trigger a suspension?).

To verify the accuracy of coding for customer no-shows, reviewers randomly selected and analyzed GHTD’s no-shows occurring in September 2015. The results indicate that 83 percent of the sample trips were coded correctly by drivers.

September 2015

| No-show description | Total | % | Vehicle Arrived W/I Pick Up Window | % | Vehicle Arrived >30 Minutes after Neg. Time | % | Vehicle Arrived Before Neg. Time (Early) | % | Coded Correctly | % | Wait time Req't Met | % |
|-------------------------|-------------|-------------|------------------------------------|-------------|---|-------------|--|-----------|-----------------|-------------|---------------------|-------------|
| Cancel at door | 1 | 3% | 1 | 3% | 0 | 0% | 0 | 0% | 1 | 3% | 0 | 0% |
| Cancelled / missed trip | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Customer no show | 26 | 65% | 20 | 65% | 1 | 9% | 17 | 0% | 19 | 58% | 23 | 85% |
| No show - missed trip | 13 | 33% | 10 | 32% | 10 | 91% | 0 | 0% | 13 | 39% | 4 | 15% |
| Not there | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Total | 40 | 100% | 31 | 100% | 11 | 100% | 17 | 0% | 33 | 100% | 27 | 100% |
| % | 100% | | 78% | | 28% | | 43% | | 83% | | 68% | |

Reviewers learned that it is GHTD's practice to reverse no-shows disputed by customers. Team members also noted that for the twelve month period October 1, 2014 through September 30, 2015, GHTD did not report any customers as being "under service suspension".

Corrective Action Plan and Schedule: Within 60 days of the issuance of the final report, GHTD must provide to the FTA for review the following:

- revised GHTD Policy #30 concerning no-shows and late cancellations, presenting and clearly explaining reasonable sanctions; and
- revised public information (written and electronic) explaining this policy and process.

6.7 Complaint Resolution and Compliance Information

Requirements: Under 49 CFR 27.13(b), the transit agency must have administrative procedures in place that incorporate appropriate due process standards and provide for the prompt and equitable resolution of complaints. Under 27.121(b), the transit 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.

Discussion: During this compliance review, no deficiencies were found with the requirement to resolve complaints promptly and equitably.

Customer can file comments, commendations, and complaints regarding GHTD's ADA paratransit service by phone or email. GHTD and the contractor have written complaint policies and procedures.

CCRPA's handbook for riders and providers contains no mention of customer complaints or their resolution and reviewers were unable to obtain any information regarding the agency's policies for handling or resolution of customer complaints. However, team members were able to locate and analyze complaint data for the previous New Britain/Bristol service, as well as for GHTD's ADA paratransit service.

GHTD has established procedures and time requirements for complaint intake, documentation (including retention), distribution, investigation, and response. GHTD and contracted personnel use a complaint form to enter the report in the agency's database for tracking and forward the complaint to the appropriate office for processing, distributing copies to management. Supervisors must immediately investigate safety-related complaints. Staff must clear and respond in writing to service complaints within seven days of complaint receipt. GHTD staff also solicit customer comments at ADA Participation Group Forum meetings in Hartford and New Britain, and in agency meetings. Both GHTD and the contractor single out for recognition drivers and staff who provide excellent service. GHTD's managers stated that the agency retains its paratransit complaints within the computer system for ten years or more, thereby meeting regulatory requirements.

While requirements to respond to complainants are not included in the DOT ADA regulations, it is a common and effective practice for a transit provider to respond to complainants and for

transit providers to investigate allegations to ensure that all DOT ADA requirements are being met.

The review team obtained copies of all ADA-related complaints on file for GHTD for the period September 2014 through September 2015, a 13-month period. No data was available for January 2015, when GHTD assumed responsibility for the management of New Britain service. As shown in the following summary, total complaints averaged 39 per month, of which approximately 20 per month were capacity constraint-related. During the same period, GHTD was scheduling over 40,000 trips per month and providing, on average, approximately 37,000 passenger trips per month.

**GHTD: Summary of Customer Complaints
September 2014 through September 2015 (13 month period)**

| | Sep-14 | Oct-14 | Nov-14 | Dec-14 | Jan-15 | Feb-15 |
|---|--------|--------|--------|--------|--------------|--------|
| Total complaints | 30 | 41 | 29 | 32 | (not avail) | 33 |
| Capacity constraint-related complaints | 14 | 27 | 20 | 22 | 0 | 25 |
| No Show | 0 | 0 | 0 | 3 | 0 | 1 |
| Ride Length | 4 | 6 | 2 | 1 | 0 | 4 |
| Early | 0 | 0 | 0 | 0 | 0 | 0 |
| Late | 10 | 21 | 18 | 18 | 0 | 20 |
| Telephone Access | 0 | 0 | 0 | 0 | 0 | 0 |
| Service Denials | 0 | 0 | 0 | 0 | 0 | 0 |
| % constraint-related | 46.67% | 65.85% | 68.97% | 68.75% | | 75.76% |
| Non-constraint-related | 16 | 14 | 9 | 10 | (not avail.) | 8 |
| % non-constraint-related | 53.33% | 34.15% | 31.03% | 31.25% | | 24.24% |

**GHTD: Summary of Customer Complaints
September 2014 through September 2015 (13 month period)**

| | Mar-15 | Apr-15 | May-15 | Jun-15 | Jul-15 | Aug-15 | Sep-2015 |
|---|--------|--------|--------|--------|--------|--------|----------|
| Total complaints | 40 | 39 | 40 | 19 | 63 | 51 | 57 |
| Capacity constraint-related complaints | 21 | 16 | 23 | 6 | 24 | 18 | 30 |
| No Show | 2 | 3 | 4 | 0 | 3 | 3 | 2 |
| Ride Length | 1 | 4 | 3 | 1 | 3 | 5 | 8 |
| Early | 1 | 1 | 0 | 0 | 1 | 0 | 0 |
| Late | 17 | 8 | 16 | 5 | 17 | 10 | 20 |
| Telephone Access | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Service Denials | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| % constraint-related | 52.50% | 41.03% | 57.50% | 31.58% | 38.10% | 35.29% | 52.63% |
| Non-constraint-related | 19 | 23 | 17 | 13 | 39 | 33 | 27 |
| % non-constraint-related | 47.50% | 58.97% | 42.50% | 68.42% | 61.90% | 64.71% | 47.37% |

The following summary provides a snapshot of New Britain service before and after CTDOT transferred responsibility for managing this service to GHTD in January 2015. Team members were able to obtain copies of all ADA-related complaints on file for this program for the 12 month period July 2014 through June 2015. During this time, ridership for the New Britain service increased almost 20 percent from 5,031 passenger trips provided in July 2014 to 6,222 in June 2015, while customer complaints stabilized.

CCRPA: Summary of Customer Complaints Concerning Former New Britain Service
July 2014 through June 2015 (12 month period)

| | Jul-14 | Aug-14 | Sep-14 | Oct-14 | Nov-14 | Dec-14 |
|---|--------|--------|--------|--------|--------|--------|
| Total complaints | 95 | 57 | 57 | 108 | 41 | 36 |
| Capacity constraint-related complaints | 79 | 41 | 47 | 90 | 23 | 28 |
| No Show | 3 | 0 | 2 | 1 | 1 | 1 |
| Ride Length | 5 | 5 | 1 | 11 | 0 | 2 |
| Early | 2 | 7 | 0 | 12 | 2 | 4 |
| Late | 69 | 29 | 44 | 66 | 20 | 21 |
| Telephone Access | 0 | 0 | 0 | 0 | 0 | 0 |
| Service Denials | 0 | 0 | 0 | 0 | 0 | 0 |
| % constraint-related | 83.16% | 71.93% | 82.46% | 83.33% | 56.10% | 77.78% |
| Non-constraint-related | 16 | 16 | 10 | 18 | 18 | 8 |
| % non-constraint-related | 16.84% | 28.07% | 17.54% | 16.67% | 43.90% | 22.22% |

CCRPA: Summary of Customer Complaints Concerning Former New Britain Service
July 2014 through June 2015 (12 month period)

| | Jan-15 | Feb-15 | Mar-15 | Apr-15 | May-15 | Jun-15 |
|---|---------------|---------|---------|--------|--------|--------|
| Total complaints | (not avail.) | 4 | 2 | 6 | 7 | 4 |
| Capacity constraint-related complaints | (not avail.)0 | 4 | 0 | 3 | 4 | 1 |
| No Show | 0 | 0 | 0 | 0 | 0 | 0 |
| Ride Length | 0 | 2 | 0 | 1 | 1 | 0 |
| Early | 0 | 0 | 0 | 1 | 0 | 0 |
| Late | 0 | 2 | 0 | 1 | 3 | 1 |
| Telephone Access | 0 | 0 | 0 | 0 | 0 | 0 |
| Service Denials | 0 | 0 | 0 | 0 | 0 | 0 |
| % constraint-related | | 100.00% | 0.00% | 50.00% | 57.14% | 25.00% |
| Non-constraint-related | 0 | 0 | 2 | 3 | 3 | 3 |
| % non-constraint-related | | 0.00% | 100.00% | 50.00% | 42.86% | 75.00% |

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 deny any individual with a disability the opportunity to use the transportation services it provides to the general public. Discriminatory practices include and are not limited to requiring the use of alternate transportation services, requiring persons with disabilities to be accompanied by an attendant, imposing user fees or special charges upon people with disabilities and requiring people with disabilities to use designated priority seating.

Discussion: During this compliance review, no deficiencies were found with regard to nondiscrimination requirements.

Neither GHTD's printed and website policies and procedures, nor CCRPA's handbook for riders and providers refers to the "Common Wheelchair" or specifies wheelchair sizes or weights to be accommodated. The review team found no indications that GHTD is requiring customers to be accompanied by an attendant. No evidence suggests that GHTD or its contracted service provider is steering persons with disabilities toward alternate transportation services during eligibility or reservations activities.

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 compliance review, no deficiencies were found with the training requirements.

GHTD's contractor, First Transit, provides a driver training program. GHTD's contractual driver training standards stipulate that training shall be to proficiency. After examining the contractor's driver training programs and training documentation and interviewing the trainer, the review team observed that the training content and materials were comprehensive, up to date and appeared to meet DOT ADA regulatory requirements regarding proficiency, appropriateness to assigned duties, and respectful treatment of individuals with disabilities. No information about driver training for the previous New Britain/Bristol service was available.

GHTD's classroom and behind the wheel instruction for paratransit drivers includes disability awareness, sensitivity and communication; passenger assistance techniques and securement of mobility devices; effective passenger service; defensive driving; vehicle, radio and communications specifics; GHTD's operating rules; and accident prevention and safety. Ongoing operator training includes one hour per month (12 hours per year) of safety training; post-accident training (up to four hours as needed); refresher training, both as part of complaint

response, and whenever new equipment or technology is introduced; and remedial training conducted on an as-needed basis for drivers who present safety, accident prevention, and /or passenger relations issues. GHTD documents successful completion of driver training and all refresher training. The agency's new-hire driver training includes a minimum of 90 hours (because training is to proficiency, some drivers may need more time), allocated as follows: 42 hours for classroom and service observation, 10 hours of skills training, 14 hours behind the wheel (one on one with a certified trainer), and 24 hours of cadet training (accompanied in-service training).

In addition to GHTD's managers and contractor personnel, reviewers interviewed five experienced drivers in private, using a standard set of questions. Issues addressed included training, vehicle condition, schedules, and dispatch support, and verified driver understanding of GHTD's policies and procedures implementing DOT ADA regulatory requirements. Reviewers observed the following:

- All drivers understood the pickup window, but several said that some customers do not.
- When asked about pickup times being altered, one of the five drivers said that riders occasionally say that they were given a different pickup time.
- When asked whether they run late (outside the on-time window), drivers said that this does not happen often to them and that dispatch is helpful in moving rides to get back on schedule.
- Most drivers said that schedules were workable unless they were given add-on riders.
- All drivers demonstrated a good understanding of the procedures to follow when a rider seems to be a no-show.
- All drivers correctly explained GHTD's procedure to be followed when they arrive early.
- All drivers stated that they provide door-to-door service, though some riders do not want it.
- One person mentioned some drivers' failure to report for work, especially on Mondays and Fridays, as a problem for others and cited a need for more standby drivers.
- One driver stated that fare evasion is prevalent in one area and that this is difficult for drivers.

Concerning training programs for staff, reviewers observed that both CTDOT and GHTD appear committed to training and skills building. As described in the following section, CTDOT makes ADA training available to its grantees and their staffs and contractors at no cost to the agency. This training covers DOT ADA regulatory requirements, disability sensitivity, and skills building. GHTD staff have participated in these and other training programs.

6.10 Service Under Contract with a Private Entity

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

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

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

Discussion: During this compliance review, no deficiencies were found with regard to ADA compliance issues for contracted ADA complementary paratransit service, including and not limited to service provision and vehicle acquisition or with how CTDOT or GHTD communicates, oversees, and/or manages its obligations concerning contracted service with respect to eligible riders, applicants, and potential applicants.

GHTD, with ongoing input from CTDOT, appears to be actively managing and overseeing the present GHTD and New Britain/Bristol ADA services. GHTD and CTDOT provided oversight of the former New Britain/Bristol service as it transitioned to GHTD. Reviewers found no evidence of active oversight earlier, by CCRPA.

To establish the nature and extent of CTDOT's oversight of ADA paratransit service provision, the review team examined files, documents, and computer records. Reviewers conducted interviews with CTDOT's managers during and prior to the onsite review. CTDOT's administrators told team members that the department strives to maintain close working relationships with all state grantees providing ADA paratransit service, including GHTD. Because maintenance and improvement of the New Britain/Bristol ADA paratransit service have been of concern to CTDOT since the Office of Policy and Management first proposed consolidating the state's regional planning agencies, CTDOT's officials continue to monitor this service closely with GHTD. CTDOT has requested that GHTD provide separate reports for the New Britain service and continues to work actively with GHTD on issues of service quality and vehicle and driver availability.

CTDOT requires that grantees provide detailed ADA performance reports along with their monthly invoices for payment. Developed by CTDOT, the report form collects operating statistics and data on ridership, eligibility, on-time performance, phone queues, and denials. CTDOT uses this information for performance review and diagnostic purposes. CTDOT's managers stated that GHTD's invoices have reflected performance issues in the form of liquidated damage penalties imposed on its contractor, and that they have discussed these at length with GHTD.

In addition to frequent phone and onsite contacts with grantee agencies, CTDOT convenes quarterly grantee meetings to review performance, share information, and discuss service delivery and training issues. Team members also learned that CTDOT contracts with the Kennedy Center in Hartford, a nationally recognized disability training and advocacy agency, to provide consultant services to its grantees on DOT ADA regulations and compliance on an as needed/on-request basis. CTDOT also contracts with Transactional Associates and the Kennedy Center to provide ADA training to grantee staff and contractors, including customer service and ADA eligibility personnel. CTDOT, in consultation with the Kennedy Center, grantees, and disability community representatives, developed the state's new unified ADA paratransit application, which was introduced in 2015.

CCRPA and GHTD Contractor Oversight and Management

To identify how GHTD manages the services provided by its contractors, the review team met with GHTD's executive director and operations administrator. Reviewers discussed the measures GHTD takes to provide effective oversight and contract management, and to maintain contractor performance, service provision, and ongoing control over use of assets. Team members observed that, with regard to performance, GHTD appears to have actively managed its contract with its transportation provider. GHTD schedules weekly conferences to discuss service provision with contracted managers. In addition, informal phone or onsite meetings take place whenever service issues arise, often on a daily basis. Liquidated damages are imposed when contract requirements are not met. Two weeks before the onsite review, the contractor brought in regional and Northeast district managers to replace its Hartford project manager. In meetings with the review team and GHTD's management, these individuals discussed the impact of adding the New Britain/Bristol service to existing GHTD service, and corrective measures already put in place by the contractor management team to address GHTD's and CTDOT's concerns about driver availability and service provision.

GHTD monitors performance using electronic information, report data, input from site visits by staff, and complaints analysis. Reviewers examined reports and computer programs developed to enable GHTD's managers to scrutinize performance. On the day of service, GHTD's operations managers track on-time performance using the computer system. After service has been provided, the contractor generates daily, weekly, and monthly service performance reports for GHTD's review. This data is used to document imposition of liquidated damages when contract requirements are not met. GHTD staff independently verify no shows, late cancellations, and missed trips. In addition to reviewing complaints and collecting rider comments at monthly advisory committee meetings, GHTD staff and managers meet with agency customers onsite to ascertain service quality. For the New Britain/Bristol service, GHTD has taken the further step of sending a manager to the New Britain Senior Center on a monthly basis to meet with customers, obtain feedback concerning service provision, and conduct eligibility interviews. In addition, it is now GHTD's practice to hold ADA Participation Group Forum meetings in New Britain several times each year, as well as in Hartford.

The contracted service provider performs maintenance and repairs for GHTD's vehicles at the Wawarme operations facility under contract with GHTD. A GHTD manager oversees the work and tracks and reports monthly on vehicle use, inspections, and repair interval, type, and speed.

Contract oversight efforts performed by CCRPA are unknown.

6.11 Service Provided by Another Public Entity

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 DOT, 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 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: This provision is not applicable to CTDOT or GHTD. No public entities provide ADA complementary paratransit service on behalf of these agencies.

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 systems 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 compliance review, no deficiencies were found with regard to GHTD's efforts to coordinate service with other fixed route operators with overlapping or contiguous service areas or jurisdictions.

The review team examined GHTD's website and published materials and interviewed CTDOT managers, GHTD management and contracted staff. They found that CTDOT encourages broad-based transportation coordination and its grantees are expected to publicize opportunities for both fixed route and ADA paratransit riders to connect with neighboring systems.

CCRPA's rider/provider handbook states that the previous ADA paratransit service in the New Britain/Bristol area provided "interregional trips". GHTD staff informed reviewers that CCRPA's service routinely linked to GHTD's ADA paratransit service, with one organization offering a one-seat outbound ride and the other, a one-seat return trip. The present GHTD service provides one-seat transportation throughout GHTD's service area, with rides to and from New Britain and Bristol being among the longest trips. GHTD continues to link with other transit services, and riders remain responsible for making their own reservations with each system, if a reservation is required, and paying fares separately for trips on each system.

GHTD's website and its ADA paratransit brochure offer contact information concerning the ADA paratransit service provided by 12 other Connecticut regional transit organizations or districts. In addition, at www.hartfordtransit.org/links.html, GHTD publicizes CTDOT's Way to Go Mobility Management Program. Funded by FTA, this program helps senior citizens and people with disabilities navigate transportation options by creating a point of access for all services available in the North Central region of Connecticut. The project website, www.waytogoc.org, contains a resource guide with information on transportation options, schedules, travel training, taxi voucher programs, Dial-A-Ride, public and private transit.

Summary Table of Compliance Review Findings

| Item | Requirement of 49 CFR Parts 27 or 37 | Reference | Site Visit Finding Deficiency/ No deficiency or advisory comment | Description of Findings | Suggested Corrective Action | |
|------|---|-------------------|--|--|--|--|
| 1 | Comparable paratransit service | 37.121 | ND | - | - | - |
| 2 | Absence of administrative burden | 37.125 & 37.5 | ND | - | - | - |
| 3 | Paratransit eligibility standards | 37.123 (e)(1)-(3) | ND | - | - | - |
| 4 | Accessible information | 37.125(b) | D | A deficiency was found with the accessible information requirement. GHTD's website and print materials do not consistently communicate the availability of information in accessible formats upon request. | Provide to the FTA documentation that notices of the availability upon request of information in accessible formats have been added to: (1) GHTD's website; (2) down-loadable materials offered there; (3) GHTD service information and eligibility, appeal, and no-show/service suspension correspondence. | Within 60 days of the issuance of the final report |
| 5 | Eligibility determinations within 21 days | 37.125(c) | ND | | | |
| 6 | Written eligibility determinations including specific reasons for denials or temporary or conditional | 37.125(d)(e) | D | Deficiencies were found with the requirement for written eligibility determinations. File review showed that GHTD's certification letters finding applicants conditionally or temporarily eligible did not always provide specific reasons for this decision. Other required elements were included. | Provide to the FTA for review revised certification letters and letter templates demonstrating that the following elements are included: <ul style="list-style-type: none"> specific, transit-based reasons for determinations of ineligibility, temporary or conditional eligibility, and for any limitations on eligibility, which reflect current DOT ADA regulatory guidance. | Within 60 days of the issuance of the final report |

| | | | | | | |
|---|---|-----------|----|---|---|--|
| 7 | Recertification of eligibility at reasonable intervals | 35.125(f) | ND | - | - | - |
| 8 | Administrative appeals process for denials and grants of conditional and temporary eligibility and unreasonable administrative burdens in appeals | 37.125(g) | D | Deficiencies were found with the requirements for the administrative appeals process for eligibility. GHTD's appeals policy #40 has remained essentially unchanged since 1991. It requires written appeals, and provides no explanation of the individual's right to a hearing. | GHTD must provide to the FTA for review: <ul style="list-style-type: none"> a revised administrative appeals policy # 40 and process which provide appellants the opportunity for an in-person informal hearing and offers a clear explanation of the appellant's right to present written and oral information and to be accompanied by advocates. This policy shall include appropriate separation of functions, shall permit but not require the appellant's presence, and shall not require a written appeal nor statement of a reason for appeal; and revised written and electronic public information materials, and templates for eligibility determination letters, to reflect these changes and assure consistent wording across all documents and website information. | Within 60 days of the issuance of the final report |
| 9 | Complementary paratransit for visitors | 37.127 | D | Deficiencies were found with the requirement to provide visitor service. GHTD's public information materials and Policy #39 do not correctly describe the bases for ADA eligibility as a visitor. | GHTD must provide to the FTA for review the following: <ul style="list-style-type: none"> revised public information (written and electronic) and GHTD Policy #39 concerning the availability of visitor service, the bases for eligibility, and how to obtain this service. | Within 60 days of the issuance of the final report |
| 6.3 Types of Service | | | | | | |
| 10 | Types of service | 37.129 | ND | - | - | - |
| 6.4 Service Criteria for Complementary Paratransit | | | | | | |
| 11 | Service area | 37.131(a) | ND | - | - | - |
| 12 | Response time | 37.131(b) | ND | - | - | - |
| 13 | Fares | 37.131(c) | ND | - | - | - |
| 14 | No trip purpose restrictions | 37.131(d) | ND | - | - | - |
| 15 | Hours and days of service | 37.131(e) | ND | - | - | - |

| | | | | | | |
|----|--|---------------------------------------|----|---|---|---|
| 16 | Absence of capacity constraints | 37.131(f) | ND | - | - | - |
| 17 | No restrictions on the number of trips provided to an individual | 37.131(f)(1) | ND | - | - | - |
| 18 | No waiting list for access to the service | 37.131(f) (2) | ND | - | - | - |
| 19 | No substantial numbers of significantly untimely pickups for initial or return trips | 37.131(f)(3)(i)(A) | ND | - | - | - |
| 20 | No substantial numbers of trip denials or missed trips | 37.131(f)(3)(i)(B) 37.131(3)(1)(B) | ND | - | - | - |
| 21 | No substantial numbers of trips with excessive trip lengths | 37.131(f)(3)(i)(C) | ND | - | - | - |

| | | | | | | |
|----|--|-----------|---|--|---|---|
| 22 | No operational patterns or practices significantly limiting service availability | 37.131(f) | D | <p>Deficiencies were found with the requirements that ADA paratransit service be provided without the use of any operational patterns or practices that significantly limit the availability of service, including telephone access and driver availability.</p> <p>Test calls and analysis of sample telephone data for the reservations unit indicated long hold times. The agency's telephone performance standards do not address hourly variations in phone queue lengths. Staffing appears insufficient to provide adequate phone coverage. The contractor's driver roster may be insufficient to serve current or increased passenger volumes since the New Britain/Bristol service was folded into GHTD service.</p> | <p>Telephone access: GHTD must provide to the FTA for review the following:</p> <ul style="list-style-type: none"> • a list of corrective measures being taken to resolve long waits in reservations queues and the high rate of abandoned calls, and address evident staffing issues; • revised telephone performance standards, policies, and procedures for the handling of calls to the reservations unit; and • a list of actions being implemented to assure that managers, reservations and dispatch staff, and supervisors (both contracted and GHTD employees) understand these requirements, and to assure that compliance is being monitored and enforced. <p>Driver availability: GHTD must provide to the FTA for review the following:</p> <ul style="list-style-type: none"> • monthly reports showing, by week, totals for: full and part-time drivers available, vehicles needed to meet weekday peak hour requirements, drivers hired, and drivers in training; and • a list of administrative and operational actions proposed or being taken to address issues of driver availability. | <p>Within 60 days of the issuance of the final report</p> <p>Within 60 days of the issuance of the final report</p> |
|----|--|-----------|---|--|---|---|

| 6.5 Subscription Service | | | | | | |
|--|--|----------------------|-----|--|--|--|
| 23 | Subscription Service | 37.133 | ND | | | |
| 6.6 Reasonable Policies for Proposed Service Suspensions for Missing Scheduled Trips and the Right to Appeal | | | | | | |
| 24 | No-show, late cancel and reasonable service suspension & appeal policies | 37.125(h) (1)-(3) | D | Deficiencies were found with the requirements concerning no-show and late cancellation policies, and the reasonableness of proposed sanctions. GHTD's No-Show Policy #30 requires clarification of conditions triggering suspension to assure reasonableness and minimize confusion. | GHTD must provide to the FTA for review the following: <ul style="list-style-type: none"> revised GHTD Policy #30 concerning no-shows and late cancellations, and presenting and clearly explaining reasonable sanctions; and revised public information (written and electronic) explaining the policy and process. | Within 60 days of the issuance of the final report |
| 6.7 Complaint Resolution and Compliance Information | | | | | | |
| 25 | Complaint Resolution & Compliance Information | 27.13(b) & 27.121 | ND | | | |
| 6.8 Nondiscrimination | | | | | | |
| 26 | Non-discrimination | 37.5 | ND | - | - | - |
| 6.9 Training Requirements | | | | | | |
| 27 | Training | 37.173 | ND | - | - | - |
| 6.10 Service Under Contract with a Private Entity (if applicable) | | | | | | |
| 28 | Service under Contract | 37.23 | ND | - | - | - |
| 6.11 Service Provided by Another Public Entity (if applicable) | | | | | | |
| 29 | Service provided by another public entity | 37.21(b) | N/A | - | - | - |
| 6.12 Coordination of Service | | | | | | |
| 30 | Coordination of service | 27.139(g) | ND | - | - | - |

Attachment A

FTA Notification Letter to Connecticut Department of Transportation



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

Headquarters

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

July 31, 2015

Honorable James P. Redeker
Commissioner
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131-7546

Dear Commissioner Redeker:

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 at 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 a number of on-site ADA compliance reviews of grant recipients. The Connecticut Department of Transportation (CDOT) has been selected for a review of its Mobility/Paratransit complementary paratransit service operated by the Greater Hartford Transit District and the Central CT Regional Planning Agency to take place during the week of October 26, 2015.

The purpose of this review will be to determine whether CDOT 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 and 38.

The review process includes data collection and analysis prior to the on-site visit, an opening conference, on-site observation and analysis of the CDOT complementary paratransit service, and an exit conference. The entire on-site portion of the review will be completed within five days. FTA has engaged the services of Milligan and Company, LLC (Milligan), of Philadelphia, PA, to conduct this compliance review. The Milligan team and FTA representatives will participate in the opening and exit conferences, with FTA participating by telephone.

We request an opening conference at **9 a.m. on Monday, October 26, 2015**, to introduce the Milligan team and FTA representatives to CDOT, including you or your designee, the Mobility/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 the CDOT Mobility/Paratransit offices for the duration of their visit. Please let us know if you will designate a member of your staff to serve as CDOT's liaison with the review team and to 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**.

Electronic copies of documents are preferred. Please upload them to Milligan's file transfer protocol (FTP) site. Your reviewer will reach out to you concerning the use of the FTP site. Please be prepared to designate a point of contact for your agency, for which user access should be provided. You also have the option of sending the documents via email to Sandra Swiacki at sswiacki@milligancpa.com.

Enclosure 2 consists of items that the Milligan team will review on-site beginning on October 26, 2015, after the opening conference.

We request the exit conference be scheduled for **11 a.m. on Friday, October 30, 2015**, to afford an opportunity for the reviewers to discuss their observations with you and your agency. We request that you or your designee, the CDOT Mobility/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 a Draft Report. You will have an opportunity to correct any factual errors before FTA finalizes the report. The Draft and Final Report, when issued to CDOT, will be considered a public document subject to release under the Freedom of Information Act, upon request.

If you have any questions or concerns before the opening conference, please contact Anita Heard, Program Manager for this compliance review, at 202-493-0318 or via e-mail at anita.heard@dot.gov.

Thank you in advance for your assistance and cooperation as we undertake this process. We look forward to working with CDOT and the Mobility/Paratransit staff.

Sincerely,



John Day
ADA Team Leader

cc: Mary Beth Mello, FTA Region I Administrator
Peggy Griffin, FTA Region I Civil Rights Officer

Connecticut Department of Transportation (CDOT)
Complementary Paratransit Compliance Review

Enclosure 1

The following information regarding the Greater Hartford Transit District and the Central CT Regional Planning Agency must be submitted to Milligan 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 the contractor?) and the address where reservations are taken
 - How trips are scheduled (by the contractor?) and the address where scheduling is done
 - How dispatching is handled (by the contractor?) and the address of the central dispatch office

Note that Milligan 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, and copies of any joint operating agreements for ADA complementary paratransit with other public entities
3. A copy of the ADA complementary paratransit driver manual or handbook
4. Copies of the ADA complementary paratransit application(s) and eligibility information materials, including visitor service
5. Written description of the agency's ADA eligibility appeal process
6. A copy of the ADA complementary paratransit rider handbook, service brochure, and/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. Written description of the agency's ADA complementary paratransit service standards, including:
 - The on-time performance standards (how is "on-time" defined and what is the goal for the percentage of trips to be provided within the standards?)
 - What standards have been set regarding acceptable numbers or percentages of ADA trip denials?
 - The travel time standards, including maximum travel time (if applicable) (what travel time is considered comparable to fixed route and what travel time is considered too long? What are the goals for the percentages of trips to be provided within the standards?)

Connecticut Department of Transportation (CDOT)
Complementary Paratransit Compliance Review

9. Telephone call-handling performance standards for calls to reservation and dispatch, including:
 - Maximum and standard queue hold time
 - Call pickup times
 - Calls abandoned
 - Goals for the percentages of calls to be handled within these standards
10. Copies of completed driver manifests for the most recent six-month period, scanned or in electronic format (for each of the agency's contractors, if applicable)
11. Capital and operating budget and expenditure information for the agency's ADA complementary paratransit service for the three most recent fiscal years, including the current Federal fiscal year
12. The total number of ADA complementary paratransit trips requested, scheduled, and 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

**Connecticut Department of Transportation (CDOT)
Complementary Paratransit Compliance Review**

Enclosure 2

We request that the following information and/or assistance regarding the **Greater Hartford Transit District** and the **Central CT Regional Planning Agency** be available at the **beginning of the on-site visit**:

1. The following ADA complementary paratransit data, by month, for the most recent six-month period (paper copies as well as in electronic format, if available):
 - Service usage:
 - Trips requested (include both demand and subscription 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 showing customer's name, origin, requested destination, day, date, and time requested, and if the person was ambulatory or used a wheelchair
 - On-time performance information
 - Subscription trips by hour
 - A listing of trips that exceeded 60 minutes showing customer's name, origin, destination, day, date, and time of trip, if the person was ambulatory or used a wheelchair, and total time on-board
 - Telephone call management records (if available) showing hold times by hourly or half-hourly periods and day, total call volume, calls answered and abandoned
 - For the last month, a listing of passenger no-shows and carrier missed trips showing customer's name, origin, destination, day, and date of trip, with negotiated pickup times and actual vehicle arrival and departure times
2. A listing of all complaints related to ADA complementary paratransit service in the past year. 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. showing:
 - Customer 's name
 - Nature of complaint
 - Date and time of trip request (if applicable)
 - Requested trip date, time, origin, and destination (if applicable)
 - Scheduled trip date, time, origin and (if applicable) carrier
 - Transit system resolution; any corrective actions requested and taken

**Connecticut Department of Transportation (CDOT)
Complementary Paratransit Compliance Review**

3. The following ADA paratransit eligibility information:
 - Copies of eligibility guidelines and policies and any assessment or interview forms
 - Sample letters for all types of determination used by agency--unconditional , conditional , temporary, visitor, trip-by-trip eligibility (if applicable)-- and
 - Other letters related to receipt of applications, incomplete applications, eligibility appeals and other eligibility issues
 - Any documentation , policies, procedures and correspondence related to service suspensions for passenger no-shows
 - Total number of ADA paratransit eligible individuals currently registered
 - Eligibility data for the most recent 12 months, by month:
 - Number of applications received
 - Number of completed applications considered and processed
 - Number of applications determined incomplete
 - Number of people determined unconditional eligible
 - Number of people determined conditionally eligible
 - Number of people determined temporarily eligible
 - Number of people determined ineligible
 - Access to eligibility files and appeals records
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 ADA complementary paratransit fleet roster (by provider) with vehicle type, make, 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 day of week and hour of day)
8. Access to the most recent six months of daily vehicle pullout records showing late pullouts and closed runs, by provider (if appropriate)
9. Vehicle availability reports for most recent six months
10. Copies of vehicle pre-trip inspection and preventive 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. Training curricula for each type of ADA complementary paratransit employee
14. Procedures for providing information and communication in accessible formats

Attachment B

Greater Hartford Transit District's Response to Draft Report

From: Vicki L. Shotland
Sent: Monday, May 02, 2016 11:57 AM
To: 'anita.heard@dot.gov'
Cc: 'jon.day@dot.gov'; 'Almeida, Ricardo L'; DJ Gonzalez; 'Sanders, Michael A'; 'yolanda.mitchell.ctr@dot.gov'
Subject: FW: CDOT ADA Draft Report
Importance: High

Good Morning Anita,

The following are minor corrections that we observed on the draft ADA Compliance Report.

- Spelling correction: the word baases (3rd bullet point under Administrative Deficiencies on **page ii**) should be **basis**.
- Page 4- Introduction.... correction **CCRPTA** s/b **CCRPA**
- Page 9- CT Department of Transportation, Charlie Carson should be listed properly under his employer CTTransit.
- Page 9- D.J. Gonzales is spelled incorrectly and s/b Gonzalez
- Page 11- Sandy Infantino's title is incorrect, and should be *CTDOT-Transportation Supervising Planner*
- Page 13- (4th bullet point) Drivers are absolutely allowed to use GPS, but there may have been a miscommunication to some who were under the impression that they could not at the time of the audit interview. This has been clarified by First Transit management to all bus operators, and should no longer be an issue.

If you have any questions please do not hesitate to call me at your earliest convenience. Thank you again.

Best Regards, Vicki

Vicki L. Shotland

Vicki L. Shotland
Executive Director
One Union Place
Hartford, CT 06103
Tel: 860.247.5329 x3002
Email: vshotland@ghtd.org
Website: www.hartfordtransit.org

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