



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

**City of Albuquerque Transit Department**  
ADA Paratransit Compliance Review

Final Report  
March 2017



U.S. Department of Transportation  
Federal Transit Administration

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# Executive Summary

## Objective and Methodology

This report reviews the City of Albuquerque Transit Department (ABQ Ride)'s complementary paratransit service, Sun Van, within Bernalillo County, New Mexico, which includes the City of Albuquerque. Its objective is to verify whether ABQ Ride 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 three-person review team's data analyses supported by on-site observations of how ABQ Ride Sun Van handles trip requests, scheduling and dispatching, examinations of eligibility applications and related documents (including appeals), and interviews with ABQ Ride employees
3. Analysis and reporting: using site-visit data, identification of deficiencies requiring corrective actions and suggestions of effective practices in complementary paratransit service

## Key Findings

ABQ Ride's ADA Complementary Paratransit Program includes the following positive program elements:

### **Positive Program Elements**

- ABQ Ride interviews all applicants as part of its ADA paratransit eligibility determination process. This in-person exchange is used to ensure that the most appropriate service is provided to riders, including hand-to-hand service for riders who cannot be left unattended.
- ABQ Ride has a low complaint rate. Reviewers' analysis showed only one complaint per 1,000 eligible rider trips provided.
- ABQ Ride budgets and plans to meet all ADA paratransit demand. There are no trip denials or waiting lists.
- ABQ Ride has a rider's guide, titled "Sun Van & You" that explains the many complex aspects of ADA paratransit service in an accurate and understandable way.

ABQ Ride'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, 37 and 38.

**Administrative Deficiencies**

- Eligibility determinations do not consider an applicant's ability to travel throughout the service area.
- Eligibility certification letters do not provide specific, transit-based reasons for decisions in determinations of ineligibility, or temporary or conditional eligibility.
- Appeal decision letters do not provide specific reasons for decisions that deny or place limitations on eligibility.

ABQ Ride'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, 37 and 38.

**Substantive Deficiencies**

- ABQ Ride has a substantial number of late pickups for initial or return trips.
- ABQ Ride has a significant number of late drop-offs for trips that have a stated appointment time.
- ABQ Ride does not adequately monitor telephone performance.

Please see Section 6 for a discussion of each deficiency. The Summary Table of Compliance Review Findings (following Section 6) lists all findings. Unless otherwise stated, ABQ Ride 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 Albuquerque Transit Department (ABQ Ride)'s complementary paratransit service, Sun Van. Information on ABQ Ride, the review team, and the dates of the review are presented below.

<b>Grant Recipient:</b>	Albuquerque Transit Department (ABQ Ride)
<b>City/State:</b>	Albuquerque, NM
<b>Grantee Number:</b>	1523
<b>Executive Official:</b>	Bruce Rizzieri, Director of Transit
<b>On-site Liaison:</b>	Annette Paez, Associate Director
<b>Report Prepared By:</b>	Milligan and Company, LLC
<b>Dates of On-site Visit:</b>	November 15–18, 2016
<b>Review Team Members:</b>	Russell Thatcher, Cynthia Lister, Habibatu Atta

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## 2. Jurisdiction and Authorities

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

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

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## 3. Purpose and Objectives

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

### 3.1 Purpose

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

### 3.2 Objectives

The primary objective of this paratransit review is to verify whether a public operator of a fixed-route transit system that benefits from FTA funding is meeting its obligations under the ADA to provide paratransit as a complement to its fixed-route service. This review examines the policies, procedures, and operations of 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 also conducted its own independent analysis of sample data. In addition, FTA solicited comments from eligible riders and from local disability organizations.

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

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## **4. Introduction to Albuquerque Transit Department (ABQ Ride)**

The City of Albuquerque Transit Department (CATD) is known locally as ABQ Ride. ABQ Ride serves the Albuquerque metropolitan area, which includes the City of Albuquerque and portions of Bernalillo County. The service area population is 661,629.

ABQ Ride provides both fixed route and ADA paratransit service. All services are provided in-house. ABQ Ride operates 40 fixed routes with a fleet of 157 buses. Fixed route service types include; Rapid Ride Routes, which are fast/frequent service, local all-day regular service, and commuter routes operated during peak hours only. Fixed route service is designed around five transit centers. The Alvarado Transportation Center, which is the main downtown center, also houses the ABQ Ride administrative offices and the ADA paratransit operation. The fixed route service also connects at these transit centers to the Rail Runner, a commuter rail service that operates between Belen, which is south of the City, to Santa Fe. The Rail Runner service is operated by a separate entity, the Rio Metro Regional Transit District.

Fixed route bus service is provided on weekdays and Saturdays from 5:30 a.m. to 10:00 p.m., except Central Avenue where service is provided until midnight. Fixed route service is provided on Sundays from 6:00 am to 7:00 pm. The base adult fare for fixed route bus service is \$1.00. A reduced fare of \$.35 is offered to Honored Citizens (persons with disabilities, the elderly, and Medicare cardholders) during all hours of service. A variety of monthly or multi-month passes are available to regular riders.

ABQ Ride also has a funding Memorandum of Understanding (MOU) with the Rio Metro Regional Transit District (RMRTD) to operate a non-commuter bus route (Route 155) into the bordering community of Rio Rancho, which is just north of the City of Albuquerque. RMRTD funds the route from the City border into Rio Rancho. ABQ Ride operates the service for RMRTD.

### **4.1 Introduction to Paratransit Services and Organizational Structure**

ABQ Ride also provides ADA paratransit service, also known locally as Sun Van, in all areas where fixed route service is provided. This includes the City of Albuquerque and some portions of Bernalillo County which are within three-quarters of a mile of non-commuter fixed routes. ADA paratransit service operates during all days and hours that fixed route service is provided. The ADA paratransit fleet consists of 70 accessible body-on-chassis minibuses. The ADA paratransit fare is \$2.00 and coupon books with 20 ride coupons cost \$18.00.

ABQ Ride's ADA paratransit service is provided in-house. The City owns all vehicles, related equipment and computer software. City staff, supplemented by some temporary employees, perform reservations, scheduling, dispatch, vehicle operations, and vehicle maintenance. City staff also provides customer service (general information) and performs all aspects of the ADA paratransit eligibility determinations process.

The City's 311 call center handles complaints related to City services, including public transit. Complaints related to fixed route and ADA paratransit services are referred to the ABQ Ride for investigation and response.

As of November 2016, 3,139 customers were registered with ABQ Ride as ADA-eligible. From July 1, 2015 through June 30, 2016 (the City's Fiscal Year 2016), ABQ Ride provided 258,217 one-way trips to ADA-eligible riders. ABQ Ride does not provide any non-paratransit demand-response transportation.

## 5. Scope and Methodology

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

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

### 5.1 Scope

The review focused on whether the ABQ Ride ADA paratransit service, Sun Van, operates according to the service criteria specified in 49 CFR §37.131 of the DOT ADA regulations, and without capacity constraints prohibited under 49 CFR §37.131(f). The review examined ABQ Ride's ADA paratransit service area, response time, fares, and 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), 27.121(b), and 37.17)
- Nondiscrimination (49 CFR §37.5)
- Service under contract (49 CFR §37.23) (if applicable)
- Requirement for comparable complementary paratransit service (49 CFR §37.121)
- ADA paratransit eligibility: Standards (49 CFR §37.123)
- Paratransit eligibility process (49 CFR §37.125) including:
  - Information is made available in accessible formats upon request
  - A decision is made within 21 days or presumptive eligibility is granted pending a decision
  - There is written notification of all decisions

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

## 5.2 Methodology

The FTA Office of Civil Rights sent a notification letter to Bruce Rizzieri, the Albuquerque Transit Department's Director, on July 11, 2016 confirming the dates for the review and requesting that information be sent to the review team in advance of the on-site visit (Attachment A).

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

- ABQ Ride's description of how its ADA complementary paratransit service is structured
- Public information describing Sun Van, ABQ Ride's ADA complementary paratransit service
- ABQ Ride's standards or goals for on-time performance, trip denials, missed trips, paratransit trip length, on-time performance, and telephone hold times

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

- Copies of completed driver manifests for recent months
- 36 months of ABQ Ride Sun Van service data, including the number of trips requested and subscription trips per hour
- Records of ABQ Ride Sun Van consumer comments and complaints related to capacity issues: trip denials, on-time performance, travel time, and telephone access
- Procedures for passenger service reports reporting complaints and other incidents
- ABQ Ride's summary of complaints



- Eligibility data and information for the most recent 12-month period
- An ABQ Ride Sun Van complementary paratransit fleet roster
- Data regarding ABQ Ride Sun Van's run structure and daily vehicle pull-out records
- A listing of paratransit personnel and their start dates and work shift assignments
- Training curricula for each type of complementary paratransit staff and contracted personnel
- Capital and operating budgets and cost data
- Procedures for providing information and communication in accessible formats

The on-site review of ABQ Ride's ADA complementary paratransit service took place from November 15 through 18, 2016. The opening conference was held at 9 a.m. on Tuesday, November 15, at the ABQ Ride offices at 10 1<sup>st</sup> Street SW, Albuquerque, NM. The following people attended the meeting:

Albuquerque Transit Department (ABQ Ride)

- Bruce Rizzieri, Director
- Annette Paez, Associate Director
- Anthony Chavez, Assistant Transit Manager Operations
- Sandra Saiz, ABQ Ride Supervisor

Federal Transit Administration (FTA), Office of Civil Rights (by phone)

- John Day, Program Manager for Policy and Technical Assistance
- Rebecca Rand, Regional Civil Rights Officer, Region VI

Milligan and Company, LLC

- Russell Thatcher, Lead Reviewer
- Habibatu Atta, Reviewer
- Cynthia Lister, Reviewer

Following the opening conference, the review team met with ABQ Ride management to discuss the information sent in advance and the information and materials that were made available on site. Sun Van policies and procedures were discussed. During the remainder of the day, team members discussed the process for handling rider comments and complaints and requested detailed complaint records from recent months for further examination. Reviewers examined fixed route schedules and interviewed managers to ascertain whether Sun Van paratransit met regulatory standards for areas, days, and hours of complementary service. Reviewers also began examining the ADA paratransit eligibility process with ABQ Ride staff and gathered eligibility and appeal files to examine. Other team members interviewed ABQ Ride staff about telephone capacity and requested Sun Van telephone records for recent months. The review team also began the process of calculating on-time performance for a sample week of service (September 18 through 24, 2016).

In the morning on Wednesday, November 16, 2016, the review team began observing the trip reservations process. Reviewers sat with reservationists, listened in on calls from riders, and

recorded the handling of trip requests, including the negotiation of requested trip times. The review team paid particular attention to policies regarding trip reservations and whether ABQ Ride used any form of trip caps or waiting lists. Reviewers also obtained information on the number of call center staff and their work shifts. In the afternoon on November 16, 2016, reviewers interviewed ABQ Ride staff about the no-show policy and began examining no-show suspension records. Reviewers also interviewed ABQ Ride managers about the process used to plan and budget for Sun Van services. Other team members interviewed Sun Van schedulers and dispatchers and observed the dispatch process. Reviewers met with scheduling personnel to examine the scheduling software, examine its mapping capabilities, and discuss procedures used to develop final driver manifests. Reviewers also observed the management of runs by dispatchers, with an emphasis on proactive run management and the handling and coding of rider no-shows. The review team also began the process of comparing Sun Van ride times to fixed route ride times for a sample of long trips.

On Thursday, November 17, team members observed the trip reservation process for a second day and interviewed additional Sun Van drivers. The review team also reviewed training files and materials, and interviewed training staff. Reviewers continued to calculate on-time performance and compare Sun Van and fixed route travel times. The review team continued work with ABQ Ride staff to obtain telephone hold time information. In addition, the review team completed its examination of the ADA paratransit eligibility determination process and the no-show suspension process.

The review team gathered and analyzed the following information:

- Comments from riders and advocates through telephone interviews, and through a review of comments and complaints on file at FTA and ABQ Ride
- Reservations policies and performance standards
- Service reports prepared by ABQ Ride showing the number of trips served and the number of trips denied for the past three years
- Call center reports showing telephone activity in reservations
- Direct observations of the handling of trips by review team members and interviews with ABQ Ride staff about the ability to accommodate trip requests

On Friday, November 18, 2016, the review team tabulated the various data that had been gathered, identified and obtained any remaining needed items, and prepared for the exit conference.

The exit conference took place at 11 a.m. on Friday, November 18, 2016 at the ABQ Ride offices. Attending the conference were:

Albuquerque Transit Department (ABQ Ride)

- Annette Paez, Associate Director
- Sandra Saiz, ABQ Ride Supervisor
- Amanda Trujillo, Transit Customer Service Supervisor

Federal Transit Administration (FTA), Office of Civil Rights (by phone)

- John Day, Program Manager for Policy and Technical Assistance

Milligan and Company, LLC

- Russell Thatcher, Lead Reviewer
- Habibatu Atta, Reviewer
- Cynthia Lister, Reviewer

### 5.3 Stakeholder Interviews

Prior to the on-site review, the review team contacted organizations serving the Greater Albuquerque disability community. The purpose of this activity was to invite agencies to participate in stakeholder interviews, determine whether service complaints had been filed with ABQ Ride, and identify practices that required further attention and analysis during the review.

The following ten organizations were contacted to participate in the stakeholder interviews:

- ABQ Ride's Paratransit Advisory Board (PTAB);
- City of Albuquerque Senior Affairs Department;
- Barelbas Senior Center;
- Independent Living Resource Center, the center for independent living (CIL) in the Albuquerque area;
- DaVita Dialysis;
- Fresenius Dialysis;
- Dialysis, Inc.;
- New Mexico Commission for the Blind;
- Adelante Development Center, Inc. (provides supported and competitive employment services); and
- ARCA – Opening Doors (serves persons with developmental disabilities).

Eight representatives from six of the organizations agreed to participate: two from the Paratransit Advisory Board (PTAB), one from Albuquerque Senior Affairs, one from the Independent Living Resource Center, two from Davita Dialysis, one from the New Mexico Commission for the Blind, and one from Adelante Development Center. Two of the eight organizational representatives were also riders of the Sun Van service. Of the ten disability community organizations contacted, four did not respond despite repeated requests.

The agency representatives were asked questions regarding:

- ABQ Ride's 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 charges associated with applying to use the service;

- complaints and how these are handled; and
- feedback regarding visitors using the service.

None of the representatives had issues with the fairness of eligibility determinations. The two PTAB representatives noted that few appeals are requested and that the appeals committee largely agrees with the initial determinations that are made. Two of the eight representatives interviewed noted that it can sometimes take a “long time” to get an appointment for an eligibility interview. One estimated up to six or eight weeks. The two PTAB representatives noted that in the past there was a shortage of interviewers but that in recent months, eligibility interviews were being scheduled without long delays.

None of the representatives indicated issues with service being extended to visitors. One person said he had referred visitors to the service and they had no problems getting Sun Van service.

None of the representatives interviewed indicated issues with trip denials, trip caps, or waiting lists. Two said that requests for same-day trips sometimes cannot be accommodated but that all advance requests are being accommodated.

Six of the eight representatives interviewed said that on-time performance was not an issue. One person said there were “some issues” but that it was due to “city traffic” and delays were not longer than on “other general public services.” One person, who was a rider of the Sun Van service said she had experienced on-time problems, particularly with getting to appointments on-time. When asked how often it was an issue, she estimated that she gets to her appointments late “about 30 percent of the time.”

Six of the eight representatives said that travel times were not excessive. One person said this had been an issue in previous years but that it was better in the past year. One person said she had been told that Sun Van travel times were allowed to be 30 minutes longer than similar trips on the fixed route system, which she thought was too long.

Six of the eight representatives said that telephone hold times were reasonable. One person said this had been an issue in previous years but that it was no longer an issue. One person said that “it depends on the day,” and also indicated that hold times were longer in the morning.

None of the representatives mentioned issues with the accommodation of service animals, requiring of attendants, or other potentially discriminatory policies. Two people noted that some riders are given what is called “sheltered eligibility,” which requires someone to meet them and sign for them when they are dropped off, but that this service requirement is agreed to by guardians or caregivers.

Other comments received from the representatives interviewed included:

- In the past there were driver and vehicle shortages, but additional vehicles had been acquired and more drivers have been hired in the past two years.
- Sometimes riders will call and cancel trips but the information doesn’t get to the drivers, vehicles still show up and riders are marked as no-shows.

- Sometimes there are mix-ups in arranging trips and it would be helpful if calls were tape recorded (which this person said ABQ Ride does not currently do).
- Drivers sometimes change the routes they are given at the request of riders.

Seven of the eight participants generally felt that the service was good. Two said that ABQ Ride managers who work on the Sun Van service are very good and responsive. Two also said that the handling of complaints is thorough and responsive.

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## 6. Findings and Advisory Comments

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

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

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

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

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

### 6.1 Comparable 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, or with how the transit agency communicates information on ADA paratransit service.

ABQ Ride has an active ADA paratransit eligibility determination process in place. Based on the data collected and policies, procedures, and actions examined during the review, the review team observed no failure on the part of ABQ Ride 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.

## 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 requirement to not impose unreasonable administrative burdens on applicants.

ABQ Ride does not charge application or photo fees for its Sun Van program, and does not charge a fare to new or recertifying applicants for transportation related to the application or appeal processes.

### 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, deficiencies were found with the requirements related to the paratransit eligibility process and with how the transit agency communicates eligibility for ADA paratransit service to applicants. Reviewers observed that the transit agency was not correctly applying the ADA paratransit eligibility standards.

As part of the on-site review, team members examined the agency's public information materials and website information, and reviewed eligibility materials, certification files and records, and eligibility program software. They interviewed the individuals responsible for handling Sun Van eligibility applications and assessing applicants' functional ability to access, use, and navigate public transportation independently. They concluded that ABQ Ride has established policies and procedures for the processing and tracking of ADA paratransit eligibility applications which



conform to DOT ADA regulations. Concerning eligibility standards, Sun Van information materials and application forms state: “Individuals are ADA paratransit eligible if their disability **prevents** them from: Getting to and from bus stops or train stations within the service area; using the fixed-route system because the bus route or rail station is not accessible; independently navigating the system.” Reviewers noted that these application forms reflect issues of functional ability such as path of travel factors, endurance/fatigue, ability to navigate the system and travel independently, and potential impact of environmental, architectural, and adverse weather conditions.

Nonetheless, review of 12 sample denial files indicated that Sun Van eligibility decisions did not always consider the most limiting conditions in weighing applicants’ ability to access bus stops. Instead, the file notes cited the individual’s ability to get to or from bus stops *nearest the home*. In determining eligibility, transit agencies must consider applicants’ ability to access public transportation throughout the service area. In particular, decisions must take into account individuals’ ability to readily exit or board vehicles at both origin and destination points, not solely at familiar locations near their residence.

### Eligibility Process

ABQ Ride’s eligibility process features a paper application, verification by the applicant’s treating physician or professional, and the use of mandatory in-person interviews for applicants. ADA paratransit application forms can be obtained in person or by mail, downloaded from the ABQ Ride website ([cabq.gov/transit/paratransit-service](http://cabq.gov/transit/paratransit-service)), or requested by phone. The applicant must phone to schedule an interview appointment at ABQ Ride, then bring the signed forms to the appointment. Sun Van provides applicants with free rides to and from the health care professional and also to and from the ABQ Ride interview. Interviews usually take place four days a week, at a rate of three or four per day.

Both application forms ask briefly about transit-related functional abilities. The applicant must answer questions about issues such as path of travel, endurance/fatigue, wayfinding skills, previous travel training, low light conditions, and adverse weather conditions. ABQ Ride offers phone assistance in completing the form. Despite its brevity, the two-page professional verification form permits respondents to provide information regarding the applicant’s physical, intellectual, mental health, blindness or vision impairments, and other disabilities.

During the in-person interview, Sun Van staff seek to establish the applicant’s functional ability to access, use, and navigate fixed route bus service independently. The eligibility unit manager reviews the file, makes the determination, and issues Sun Van’s determination letter. Applicants are found unconditionally eligible or ineligible.

As part of its on-site review, team members examined ABQ Ride’s public information materials and website information; eligibility materials, certification files and records, and eligibility program software; and interviewed the manager of ABQ Ride’s eligibility unit. Reviewers observed that ABQ Ride’s application activity appears thoroughly documented, tracked and monitored to meet regulatory deadlines.

Application Volume; Certification Outcomes

Reviewers analyzed ABQ Ride's eligibility application volume and outcomes for the first ten months of 2016. As of November 1, 2016, agency records show that 3,139 individuals were registered with Sun Van ADA paratransit service. This analysis also revealed that the agency's eligibility unit processed, on average, approximately 88 applications per month. Of these, approximately three-fourths were new applicants and one fourth represented recertifying riders. ABQ Ride appears to find about 96 percent of applicants, new or recertifying, unconditionally eligible. For the universe of all applicants, ABQ Ride's denial rate is approximately four percent.

**ABQ Ride Sun Van ADA Paratransit Eligibility Activity  
Calendar Year 2016**

		UNCONDITIONALLY ELIGIBLE						
	<i>Total applications received</i>	<i>Uncondl. (3 yrs)</i>	<i>Uncondl. (1 year)</i>	<i>Uncondl. (6 mos.)</i>	<i>Uncondl. (3 mos)</i>	<i>Uncondl. Visitors (21 days per yr)</i>	<i>TOTAL ELIGIBLE</i>	<i>TOTAL INELIGIBLE</i>
Jan-16	107	49	4	3	3	2	61	5
Feb-16	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Mar-16	78	56	3	2	2	1	64	3
Apr-16	74	54	2	2	-	4	62	1
May-16	61	47	4	-	-	1	52	-
Jun-16	65	49	2	-	-	1	52	-
Jul-16	54	49	2	1	-	1	53	-
Aug-16	94	72	19	-	-	2	93	3
Sep-16	104	52	21	3	1	2	79	10
Oct-16	152	52	27	1	-	4	84	1
Nov-16	-	-	-	-	-	-	-	-
Dec-16	-	-	-	-	-	-	-	-
Avg/mo	88	-	-	-	-	-	67	3

**Total current registrants 3,139**

**Denial % 4%**

**NOTE: Complete data not available for Feb. 2016 due to Interviewer position vacancy & training of replacement.**

The review team assembled and analyzed 24 ABQ Ride eligibility files, selected from an eight-month period in 2016. This sample was heavily weighted toward decisions of non-eligibility. Team members tabulated the outcomes for 20 of these applications:

**ABQ Ride Sun Van Sample Eligibility File Review Summary  
March - October 2016**

<b>Total Files Reviewed</b>	<b>20</b>
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Eligibility Outcomes	Total	Percent
Unconditionally Eligible	8	40.0%
Denied	12	60.0%
<b>Total</b>	<b>20</b>	<b>100%</b>

Eligibility File Type	Total	Percent
New	17	85.0%
Recertification	3	15.0%
<b>Total</b>	<b>20</b>	<b>100%</b>

ABQ Ride's process does not appear consistently to consider ability to travel throughout the service area. On the application form, question #7 asks: "Are you able to walk/roll *to the nearest bus stop?*" [emphasis added] Team members observed that among the sample of 20 eligibility files examined, not all determinations of non-eligibility appeared appropriate and consistent with the standards established in DOT ADA regulations. Interview forms contained observations such as these:

- "walks slowly but can walk. Bus stop near home."
- "applicant can get to bus stop...seemed very capable of riding fixed route service."
- "walks slow but house is near bus stops."
- "no difficulty walking through the building."
- of an individual also reported to have cognitive issues: "walks brisk, seems fine."

In reviewing these files, it was also not always apparent that the interviewer had recognized the collective impact of multiple disabilities - e.g., impaired mobility coupled with reduced vision and/or impaired cognitive function, obesity, COPD.

ABQ Ride's eligibility determinations must demonstrate consideration of an applicant's ability to travel between any origin and destination within the service area under all conditions. Not all trips that an applicant may make will begin at the individual's home.

**Corrective Action and Schedule:** Within 60 days of the issuance of the final report, ABQ Ride must provide to the FTA for review a revised eligibility policy statement and letter templates which reflect consideration of an applicant's ability to travel throughout the service area.

## 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, no deficiencies were found with the requirement to provide accessible eligibility information or with how the transit agency communicates the availability of materials in accessible formats to applicants and potential applicants.

This requirement obligates transit agencies to ensure that individuals with disabilities have timely access to adequate service and eligibility information, including temporary service changes. Team members examined ABQ Ride's public information materials, website information, and Sun Van eligibility and appeals correspondence and materials. They found that ABQ Ride provides eligibility and service materials in alternate accessible formats (large type, Braille, on line, computer file) upon request. The "Sun Van & You" rider's guide states on page 1 that this information is available in accessible formats upon request, and provides a contact phone number.

## 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 21<sup>st</sup> day following the submission of a complete application, it must treat the applicant as eligible on the 22<sup>nd</sup> day and have a process in place to provide service to the applicant beginning on the 22<sup>nd</sup> 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 22<sup>nd</sup> day.

**Discussion:** During this compliance review, no deficiencies were found with the requirement to have a presumptive eligibility process in place and/or make an eligibility determination within 21 days of receipt of a complete application, or with how the transit agency communicates presumptive eligibility to applicants.

In general, ABQ Ride considers an application to be complete after completion of the in-person interview. Pages 4 and 5 of "Sun Van & You" explain that an eligibility determination may require up to 21 days after receipt of a completed application. This ride guide continues: "If the applicant does not receive notification of eligibility within 21 days from the date of the in-person interview, the applicant will receive presumptive eligibility, which will entitle the applicant eligibility to ride Sun Van. Sun Van service will be provided until and unless Sun Van denies the application."

Reviewers examined ABQ Ride's computerized eligibility records and viewed the log sheets used to track application progress within the 21-day handling requirement. ABQ Ride appears to process all applications in a timely manner and to document and track its handling of applications. In interviewing ABQ Ride management and eligibility unit personnel, it was evident that they understand and comply with this requirement.

Tabulation of processing times for a random sample of 20 applications confirmed this conclusion. Team members' analysis of files found no applications where determinations had been made after 21 days. For 15 (75 percent), determinations were made in seven or fewer days. For 10 of those, the determination was made on the same day that the application was considered complete. The remaining five applications were processed in 10 to 15 days. ABQ Ride's computerized tracking records verified the data found in the files.

For applicants, prompt issuance of the determination letter after a decision has been made can be critical. Sun Van managers stated that whenever possible, ABQ Ride issues the determination letter on the same day that the decision is made. Again, application file review supported this statement; 17 of the 20 letters were issued within seven days, most on a same-day basis.

### **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 to make eligibility determinations in writing and with how the transit agency communicates eligibility determinations to applicants.

ABQ Ride's eligibility certification letters finding applicants ineligible do not provide sufficiently detailed, transit-related reasons for the decision provided. As discussed earlier, the review team examined 20 randomly selected Sun Van application files. They found that of the 12 certification letters finding individuals ineligible, all included this statement: "This determination is based on your assessed abilities to safely travel a reasonable distance to and from a bus stop; board and exit the bus, and navigate the bus system under a variety of circumstances or conditions, if needed, with travel training." This blanket pronouncement does not provide individual, specific, function-based information about the agency's reasons for denying eligibility or limiting the period of time during which an individual will be eligible. Pages 9-17 and 9-18 in FTA Circular 4710.1 provide useful guidance and sample certification texts.

**Corrective Action and Schedule:** Within 60 days of the issuance of the final report, ABQ Ride must provide to FTA for review revised letter templates and copies of recent determination letters that include specific, transit-based reasons for determinations of ineligibility and for any limitations on eligibility such as temporary status.

## 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 process or with how the transit agency communicates recertification of eligibility to applicants.

As part of its examination of ABQ Ride's eligibility policies, standards, and procedures, public information, and eligibility records, reviewers observed no differences in the handling of new and recertification applications. Team members found that ABQ Ride's recertification policies and processes meet the same standards as its policies and processes for new applicants, and that the process offers eligible riders adequate time to apply for recertification.

ABQ Ride's eligibility process typically includes recertification at three-year intervals. However, unconditionally certified riders must "renew" their certification every year by calling the Sun Van offices to verify and update address, phone, and emergency contact information. The agency notifies riders by mail approximately one month before expiration of their eligibility. In addition, Sun Van encourages eligible riders who experience any health changes or changes in medical equipment that affect their ability to use public transit to recertify at any time and includes wording to this effect in certification letters.

## 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, a deficiency was found with the requirements of the process for appealing eligibility denials or decisions that limit eligibility. Hearing decision letters sent to appellants do not provide the required specific reasons (similar to the level of detail required to be provided in the initial determination letter) for the decision provided.

## Eligibility Appeal Process

The rider's guide, "Sun Van & You", states the following on page 5:

*"Right to Appeal: Sun Van provides for an appeals process for determinations of eligibility. Applicants for Sun Van service may appeal:*

- *A determination that an applicant is not eligible for Sun Van;*
- *The conditions placed upon their eligibility.*

*In addition, Sun Van certified eligible customers whose services have been suspended for any reason may appeal their suspension of service.*

*A copy of these procedures will be included in every letter for determinations of ineligibility, conditional eligibility, or suspension of Sun Van services. Please call the Sun Van offices at 243-7433 for information on the appeals process."*

Sun Van certification letters finding applicants ineligible or temporarily eligible inform recipients of their right to appeal within 60 days and contain, in the body of the letter, basic information on the appeal process requests for an appeal can be made in writing or by calling Sun Van. Appellants may be present at the hearing if they wish, but their attendance is not required. Sun Van provides free transportation to and from the appeal hearing for the appellant and will also transport, at no fare, individuals representing or accompanying the appellant to the hearing. Sun Van encourages appellants to present additional information regarding functional abilities and to bring supporting documentation.

Sun Van coordinates the hearing process, receiving, logging and tracking the request, scheduling the hearing, informing the appellant in writing, and documenting the appeal's outcome. The agency's policy is that hearing dates must be scheduled within 30 days of the appeal request. The Appeals Subcommittee of the agency's paratransit advisory committee (members of the disability community not involved in the original decision) serve on Sun Van's independent Appeals Board, hearing appeals in an informal setting.

The independent appeals panel must render decisions within 30 days. ABQ Ride registrants receive service during the appeal period; new applicants do not. Should a decision not be made within 30 days, the applicant is granted full eligibility pending the appeal decision. If an appellant needs to reschedule a hearing, ABQ Ride accommodates the request.

Sun Van receives and processes an average of two or three eligibility appeal hearing requests each month. Reviewers examined the agency's appeal hearing records and found that in all cases, independent appeals panels had rendered decisions in writing typically 10 days after the hearing date, and in all cases within 28 days. Team members also noted that letters conveying appeals decisions did not provide specific reasons for these. Instead, each letter included this statement: "This determination is based on the information that was received at the interview and from your application you completed."

**Corrective Action and Schedule:** Within 60 days of the issuance of the final report, ABQ Ride must provide to FTA for review letter templates for eligibility appeals decisions that include samples of specific reasons for these decisions.

### 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 ABQ Ride 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 for its own paratransit system before providing this service.

**Discussion:** During this compliance review, no deficiencies were found with the requirement to make paratransit eligibility available to individuals meeting the definition of a visitor, or with how the transit agency communicates visitor eligibility to individuals.

The review team interviewed Sun Van managers concerning service to visitors and examined ABQ Ride's public information and website. Page 7 of "Sun Van & You" informs users that Sun Van will provide complementary service to visitors who present documentation that they are ADA paratransit eligible from another paratransit system; or if the individual has an apparent disability; or if the individual presents reasonable documentation of a disability. Reviewers verified that Sun Van has processes in place to initiate, provide and track service to visitors for 21 days during a 365-day period. Managers stated that whenever possible the agency completes processing visitor information on the next business day after it is received.

## 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 to eligible riders or the transit agency's procedures to provide additional assistance beyond the curb if needed due to disability for eligible riders to complete their trips.



As confirmed through on-site interviews with managers, drivers, and other personnel, driver training materials, and records review, ABQ Ride provides Sun Van service on an origin-to-destination basis. The base level of service is curb-to-curb, but assistance beyond the curb is provided when needed. ABQ Ride clearly explains its origin-to-destination policy in the “Sun Van & You” rider’s guide and in its Sun Van Driver’s manual. Page 2 of the rider’s guide says the service is origin-to-destination. Page 34 of the Driver’s Manual says: “When required, drivers will assist passengers to and from the doors of their homes and/or destinations.” The “Driver Assistance” section of the rider’s guide, on pages 19 and 20, provides detailed information about when assistance beyond the curb is provided and how riders can request or arrange for this assistance. This section states:

*“Sun Van will provide curb-to-curb paratransit service unless door-to-door is requested during the eligibility process, at the time of the reservation or during travel on the Sun Van. Sun Van riders should meet the van at the curb near the pick-up address, and will be dropped off at the curb near their destination address. Sun Van riders are expected to get to the curb at the pick-up point and from the curb at the destination point.”*

*Upon request, Sun Van drivers will offer and provide assistance as needed for riders boarding and/or exiting the van. This includes assistance in climbing the steps of the van, deploying the lift or ramp and assistance for both ambulatory and wheelchair riders. If the rider has a disability that requires assistance in traveling to or from the curb, the rider may request door-to-door service or to be certified to ride with a Personal Care Attendant (PCA). The Sun Van driver will assist the rider unless this will take the driver out of sight of the vehicle for a significant amount of time.*

*Riders requiring additional assistance for door-to-door service on a regular basis are encouraged to provide this information as part of the application process for complementary ADA paratransit eligibility, or at the time that a change in circumstances makes door-to-door service necessary. Drivers will at no time provide services that exceeds door-to-door service.*

*At facilities with multiple entrances, such as malls or hospitals, Sun Van has established designated pick-up/drop-off locations to minimize confusion. Riders whose disabilities prevent use of these designated locations, can request other pick-up or drop-off points.”*

The review team interviewed eight drivers during the review. All eight drivers indicated that they provide assistance to and from the door as needed. All eight indicated that this level of assistance is offered and provided even if the run manifest does not indicate that assistance is needed beyond the curb.

## 6.4 Service Criteria for Complementary Paratransit

**Requirement:** Section 12143(c)(3) of the ADA directed the Secretary of Transportation to establish minimum service criteria to be used when determining whether the service provided by paratransit is comparable to the regular fixed-route system. These criteria are contained in 49 CFR §37.131, and include service area, response time, fares, 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 ¾-mile radius of all of its bus routes, and within a “core service area” that includes any small areas that may be more than ¾-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 ¾-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 ¾-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 to provide ADA paratransit service available to eligible individuals to and from origins and destinations within the service area, or with how the transit agency communicates the service area to eligible riders and potential applicants. ABQ Ride describes the Sun Van service area, and instructs riders on how to determine if their planned trips are within the service area, on page 9 of the “Sun Van & You” rider's guide as follows:

*“...Sun Van serves the Albuquerque City metropolitan area and portions of Bernalillo County. Sun Van provides service at least to and from points within three-quarters of a mile along each ABQ Ride bus route, except for commuter routes, during the days and times that ABQ Ride operates.*

*Trip origins and destinations must be within the Sun Van service area. To determine if a trip is within the service area, call the Sun Van reservation office at 243-7433 (RIDE).”*

Digital files depicting all fixed routes are programmed into Trapeze, the computer system used by ABQ Ride to operate and manage the Sun Van system. The review team examined these files and compared them to the routes advertised on ABQ Ride's online trip planner. The review team then overlaid the digital map of the Sun Van service area, also programmed into the Trapeze system, onto a map of all fixed routes. This comparison showed that the Sun Van service area encompasses all areas that are within ¾-mile of all non-commuter fixed routes. This includes some areas of Bernalillo County that are outside of the City of Albuquerque.

The review team noted that ABQ Ride operates one route, Route 155, which extends outside ABQ Ride's jurisdiction and outside the Sun Van service area. The ABQ Ride Director explained that the agency operates the route under a funding Agreement with the Rio Metro Regional Transit District (RMRTD). The Agreement states: “The RMRTD shall assume all financial and operating responsibility for any required Americans with Disabilities Act (ADA) complementary paratransit services within any of the above route corridors that lie within an unincorporated area of Sandoval County or the City of Rio Rancho.” The Director noted that

RMRTD operates demand responsive service in the area of Route 155, but that ADA paratransit service is not provided. Section 6.12 contains an advisory comment concerning this service.

## 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 trips, 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 requirements to provide reservation service, schedule and provide next-day service, to negotiate pickup times with riders, and limit any negotiation or schedule changes to within 60 minutes of the requested pickup time, or with how the transit agency communicates the reservation, pick-up time negotiation and change processes and schedule changes to eligible riders.

ABQ Ride's reservations unit accepts trip requests seven days a week, 365 days a year, from 8 a.m. to 5 p.m. Reservationists accept trip requests up to three days in advance, except on Fridays when trips can be requested up to five days in advance.

Riders can schedule trips by requested pickup time, or by appointment time. If trips are requested by an appointment time, reservationists offer pickup times that will get riders to their appointments on time. If trips are requested by pickup time, reservationists offer pickups that are within one hour of the requested time. If riders indicate specific travel needs, such as an earliest departure times (e.g., when they get off work or out of school), or earliest arrival times (e.g., the earliest a program opens), reservationists work with riders to identify pickup options that meet these needs.

Two reviewers observed the trip reservation function for two hours on Wednesday, November 16, 2016 and two hours on Thursday, November 17, 2016. During these hours, reviewers documented the handling of a total of 169 calls, including 107 trip reservation calls. The following table shows the types of calls observed and the outcomes of trip reservation calls. Reviewers noted that none of the 107 trip requests were denied or waitlisted. Reservationists were able to immediately schedule 91 of the 107 trips requested. In ten cases, no scheduling

options were generated by the Trapeze system. In these cases, reservationists entered the requested time in the system and told riders their trips were scheduled for these times. Schedulers manually placed these trips on runs at a later time. In six cases, riders were given at least two pickup time options, but refused them. All times offered to riders were within one hour of the times requested. All also met any trip constraints indicated by riders, such as earliest departure time or earliest arrival time.

<b>ABQ Ride ADA Paratransit Observations of Reservations Unit Calls November 16 and 17, 2016</b>			
<b>Types of Calls Observed</b>	<b>Total</b>	<b>Outcomes</b>	<b>Total</b>
Reservation trip request	107	Scheduled during call	91
Cancellation	18	Scheduled later	10
Late Vehicle	12	Denied due to capacity	0
General Info (fares, etc.)	2	Wait list	0
Other (trip confirmations, will call activations, etc.)	30	Refused by Rider	6
<b>Total</b>	<b>169</b>	<b>Total</b>	<b>107</b>

Reviewers also noted that of the total of 107 trip reservation calls, 29 were made three days in advance of the needed trips, 34 were two days in advance, 38 were one day in advance (next day requests), and six were same day requests. This is a fairly even distribution and suggests that riders feel comfortable waiting until the day before their trips to place requests.

## 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 may be charged 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 comparable paratransit fares or policies or practices concerning fares, PCAs or companions, or with how the transit agency communicates these policies and procedures to eligible riders.

Passengers may pay ABQ Ride's \$2 ADA paratransit fare using cash, personal checks, or pre-purchased coupons. This fare represents two times the ABQ Ride fixed route full adult fare of \$1. Personal care attendants and children under nine years of age pay no fare; companions pay the same fare as the eligible rider they accompany. ABQ Ride also sells Sun Van coupon books at a discount. A book with 10 ride coupons costs \$18.

## 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 that ADA paratransit service be provided free from restrictions or priorities based on trip purpose in written policies and procedures, the eligibility process and observed reservation and scheduling practices, or with how the transit agency communicates these policies procedures and practices to eligible riders and potential applicants.

Page 2 of the “Sun Van & You” rider’s guide states: “The service can be used for any trip purpose.” ABQ Ride staff confirmed in interviews that Sun Van service operates without trip prioritization and serves all trip purposes. During observations of reservation and scheduling practices, the review team identified no inquiries about trip purpose and no indications of trip prioritization.

In reviewing ABQ Ride Sun Van certification letters and eligibility materials, team members found no trip purpose-based determinations. Reviewers found no evidence of prioritizing application processing based on trip purpose.

## Hours and Days of Service

**Requirement:** Section 37.131(e) of the DOT ADA regulations requires that the ADA complementary paratransit service be available during the same hours and days as the fixed route service. This means that if a trip can be taken between two points on the entity’s fixed route system at a specific time of day, it must also be able to be taken on paratransit. It also means that the service area may change depending upon the time of day or day of the week, when certain routes or areas may not be served. This requirement applies on a route-by-route basis. For example, an area that has fixed route bus service on weekdays but not weekends must have 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 that ADA paratransit service be provided during the same hours and days as fixed route service, or with how the transit agency communicates the hours and days of service to eligible riders and potential applicants.

Page 2 of the “Sun Van & You” rider’s guide states: “Sun Van operates during the same days and hours as ABQ RIDE’s fixed route bus service.” Page 10 of the guide lists the general Sun Van hours as Monday through Saturday from 5:30 a.m. to 10:00 p.m., and Sunday from 6:00 a.m. to 7:30 p.m. The guide also states, following these general hours: “Sun Van will also provide paratransit service for trips whenever fixed route is in service, when the origin and

destination are within a  $\frac{3}{4}$  mile radius of those fixed routes. Sun Van service will be provided until the ending time of the fixed route service.”

To ensure Sun Van service hours/days are comparable to fixed route service, reviewers compared weekday, Saturday, and Sunday schedules for each ABQ Ride fixed route with Sun Van’s earliest available pickup times and latest available return-trip pickup times. They found that on weekdays and Saturdays a few routes had first stops before 5:30 a.m. - Route 8 at 5:28 a.m. and Route 157 at 5:24 a.m. They also found that a few fixed routes had last stops past 10 p.m. on weekdays - Route 5 at 10:12 p.m., Route 140/141 at 10:14 p.m., Route 155 at 10:25 p.m., Route 157 p.m., Route 66 at 12:43 p.m., and Route 66 Late Night (operated Friday and Saturday nights only during the summer) at 1:40 a.m. Reviewers also interviewed reservation agents to confirm that Sun Van trips are accepted past 10 p.m. on weekdays and Saturdays where fixed routes are still operating.

Reviewers also observed that Sun Van has an administrative process in place to keep abreast of potential alterations to fixed route service hours and days, and to adjust ADA paratransit service hours promptly to reflect any fixed route service changes.

### **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 that ADA paratransit service be provided without limiting the number of trips that an eligible rider may take, or with how the transit agency communicates this requirement to eligible riders and potential users of the service.

ABQ Ride’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. The review team observed no evidence of practices or policies restricting the number of trips an eligible individual is provided. During observations of Sun Van’s reservations, scheduling and dispatch units, the review team found no policy or practice, formal or informal, limiting or capping the number of trips an individual may take and no indications of such restrictions.



## 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.<sup>1</sup>

**Discussion:** During this compliance review, no deficiencies were found with the requirements that ADA paratransit service be provided without the use of waiting list(s) for access to the non-subscription portion of the service, or with how the transit agency communicates this requirement to eligible riders and potential users of the service.

The review team's examination of ABQ Ride's public information, service provider contracts, and operating policies and procedures did not identify any mention of waiting lists for non-subscription trip requests. After four hours of observing reservations and scheduling practices for the Sun Van service, including the handling of a total of 107 trip requests, team members noted that all trip requests were accepted and none were placed on a waiting list.

## 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, deficiencies were found with the requirements that ADA paratransit service be provided without substantial numbers of significantly untimely pickups for initial or return trips.

The review team examined how ABQ Ride defines on-time pickups and its performance standards for on-time pickups. Reviewers also analyzed ABQ Ride's reported on-time pickup performance. To verify reported performance independently, on-time pickup performance was calculated for a random sample of trips made during the sample week of September 18 to 24, 2016.

### On-Time Pickup Definitions and Standards

ABQ Ride has established on-time service definitions for trips reserved in advance as well as for "Call When Ready" trips (trips reserved with an open pickup time where riders call when they are ready to be picked up). As indicated on page 16 of the Sun Van rider's guide, the agency considers a trip reserved in advance to be on-time when the pickup is made within a 30-minute window, from 15 minutes before to 15 minutes after the scheduled pickup time. As indicated on page 13 of the rider's guide, Call When Ready trips are classed as on-time when the pickup is made within 75 minutes of the time the rider calls to notify the support service representative or

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

dispatcher that he or she is ready. ABQ Ride's stated standard is to make pickups on-time or early at least 90 percent of the time.

### Reported On-Time Pickup Performance

ABQ Ride calculates and reports on-time pickup performance each month. Senior management reviews internal monthly service reports which provide detailed performance data. ABQ Ride also distributes to the Paratransit Advisory Board (PTAB) a monthly "Advisory Board on Transit For the Mobility Impaired" report which includes this and other service data.

The review team examined monthly on-time pickup data as well as the on-time reports generated through the Trapeze system that are the basis of the data. This examination found that ABQ Ride's reported on-time pickup performance included trips that were reserved in advance, but did not include Call When Ready trips. During the on-site review, ABQ staff recalculated on-time performance for all trips, including Call When Ready trips, for the first three months of FY 2017. The following table summarizes ABQ Ride's reported on-time pickup performance from January through September 2016 without this recalculation, as well as the recalculated performance for July through September 2016.

<b>ABQ Ride Sun Van: Reported On-Time Pickup Performance January - September 2016</b>		
<b>Month, Year</b>	<b>Reported On-Time Pickup Performance Percentage Not Including Call When Ready Trips</b>	<b>Recalculated On- Time Pickup Performance Including Call When Ready Trips</b>
January 2016	86.4%	NA
February	85.7%	NA
March	87.7%	NA
April	85.9%	NA
May	86.4%	NA
June	81.6%	NA
July	81.2%	85.7%
August	81.0%	85.6%
September	82.5%	86.6%
<b>Monthly Average</b>	<b>84.3%</b>	<b>86.0%</b>

Performance just for trips requested in advance ranged from 81.0 percent to 87.7 percent and averaged 84.3 percent for the nine-month period from January through September 2016. Recalculated performance for all trips, including Call When Ready trips, ranged from 85.6 percent to 86.6 percent for July through September 2016. The inclusion of Call When Ready trips improved monthly performance by about 4.4 percent.

### Calculated On-Time Pickup Performance

To verify the agency's reported on-time performance, the review team drew a random sample of 124 trips from driver manifests for the week of September 18 to 24, 2016. Reviewers compared



actual pickup times recorded by drivers with negotiated and scheduled pickup times. As shown below, this analysis calculated Sun Van pickup performance for the sample week to be 85 percent on-time, consistent with the recalculated performance reported in September by ABQ Ride. Most late trips were one to 15 minutes late, some were 16 to 30 minutes late, and none in the sample were more than 30 minutes late.

<b>ABQ Ride Sun Van: Independent Calculation of On-Time Pickup Performance for Advance Reservation Trips - September 18 - 24, 2016</b>			
	<b>Number</b>	<b>Number</b>	<b>Percentage</b>
Trips in Sample	124	-	100%
In Window (0/+30) or early	105	-	85%
Late (arrival after window)	19	-	15%
1-15 mins. Late	-	17	-
16-30 mins. Late	-	2	-
>30 mins. Late	-	0	-

**Corrective Action and Schedule:** Within 60 days of the issuance of the final report, ABQ Ride must provide to the FTA a plan of action for improving on-time pickup performance.

### **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. No deficiencies were found with the transit agency's standards for defining denials and transit agency missed trips or its plan for monitoring service to determine whether or not either type of capacity constraint exists.

The review team examined Sun Van service statistics, ABQ Ride's definition of trip denials and missed trips, and scrutinized capacity denials and missed trips reported by ABQ Ride. The review team also observed the trip reservation process and recorded the handling of trip requests.

### Sun Van Service Statistics

The following table, using data reported by ABQ Ride in its monthly PTAB reports, summarizes Sun Van trips requested, scheduled, denied, missed, and completed for the six-month period April through September 2016.

<b>ABQ Ride Sun Van: Analysis of ADA Trip Request Outcomes Six Month Period April - September 2016</b>							
	<b>Apr-16</b>	<b>May-16</b>	<b>Jun-16</b>	<b>Jul-16</b>	<b>Aug-16</b>	<b>Sep-16</b>	<b>Total</b>
<b>Trips requested</b>	25,702	24,586	25,225	23,664	26,936	26,497	<b>152,610</b>
<b>Capacity denials</b>	0	0	0	0	0	0	<b>0</b>
<b>Refusals</b>	169	143	110	76	309	516	<b>1,323</b>
<b>Trips scheduled</b>	25,533	24,443	25,115	23,588	26,627	25,981	<b>151,287</b>
<b>Missed trips</b>	73	54	66	40	28	60	<b>321</b>
<b>Completed trips: eligible riders</b>	19,921	18,740	19,155	18,049	20,706	19,931	<b>116,502</b>
<b>Completed trips: all riders</b>	22,660	21,334	21,840	20,618	24,141	22,960	<b>133,553</b>

### ADA Trip Denials

Reviewers found that ABQ Ride's policy and practice is to have no trip denials. The agency considers trips that cannot be accommodated at all, as well as trips that cannot be accommodated within 60 minutes of the requested pickup time, to be denials. The agency counts and reports trips offered within 60 minutes of the requested time, but not accepted by riders to be refusals.

Reviewer observations of the trip reservation process found that no trip requests were denied and all trip times offered were within 60 minutes of the times requested. Reservationists also observed that reservationists take appointment times, earliest arrival times, and other stated trip constraints into consideration when offering and negotiating trip times.

As shown in the table above, 151,287 trips were scheduled in the six-month period from April through September 2016. No capacity denials and 1,323 refusals were reported.

### Missed Trips

Managers informed reviewers that the agency defines missed trips as trips that are not performed at all or trips where the vehicle shows up late and the trip is not taken. Page 16 of the "Sun Van & You" rider's guide states: "A missed trip occurs when a vehicle arrives after the end of the 30-minute window and the rider is not available, or chooses not to take the trip."

ABQ Ride reports show a small number of Sun Van missed trips each month. The agency reported 321 missed trips for the six-month period from April through September 2016, or about 0.2 percent of all trips scheduled.

With the assistance of ABQ Ride staff, review team members generated a special report of trips in September 2016 that were cancelled late, cancelled at the door, no-showed, and missed. The report showed scheduled as well as actual vehicle arrival and departure times. The review team analyzed 50 trips randomly selected from the report to determine if trips had been coded correctly. Reviewers found that 96 percent of the trips analyzed were coded correctly. Two trips in the sample were miscoded as no-shows when the vehicles arrived just past the 30-minute on-time window. Team members were told that before no-shows are assessed, staff review and, if necessary, correct the coding.

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

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

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

**Discussion:** During this compliance review, no deficiencies were found with the requirements that ADA paratransit service be provided without substantial numbers of trips with excessive trip lengths, or with the agency's monitoring of service to determine whether or not this type of capacity constraint exists.

The review team examined how ABQ Ride defines an excessively long trip and reviewed on-board ride time data reported by ABQ Ride. In addition, team members conducted an independent analysis to compare ADA paratransit and fixed route on-board ride times for a sample of 30 long trips taken during the month of September 2016.

#### Trip Length Definition and Performance Standard

In its written response to FTA's initial information request, ABQ Ride provided the following information regarding the Sun Van travel time standard and goal:

*"Sun Van is a shared ride service. Sun Van rides are comparable to travel times on ABQ RIDE fixed route service, taking into account actual time on board the bus, walk time to/from transfer points and anticipated wait time. This could mean that the Sun Van trip will take up to thirty (30) minutes longer than a comparable fixed route trip. The goal is to provide 98% of trips within this time standard."*

This information is also provided on page 10 of the ‘Sun Van & You’ rider’s guide under the heading “Trip Length.”

### Monitoring and Reporting of On-Board Ride Times

ABQ Ride monitors Sun Van on-board ride times each month. Sun Van managers generate special ride time data for inclusion in the ACT monthly report. This includes the average trip length in minutes, the number of trips with travel times of 105 minutes or more, and the percentage of total trips provided that had travel times of 105 minutes or more. The table below provides this travel time data from the ACT monthly reports for April through September 2016.

<b>ABQ Ride Sun Van: Reported Travel Time Data April - September 2016</b>			
<b>Month, Year</b>	<b>Average Trip Length (minutes)</b>	<b>Trips with Travel Times of 105+ Minutes</b>	<b>Percent of Total Trips</b>
April, 2016	30.0	55	0.28%
May	30.2	37	0.20%
June	30.3	33	0.17%
July	30.8	33	0.18%
August	31.1	54	0.26%
September	31.7	41	0.21%

As shown, reported average monthly trip length on Sun Van is 30 to 31.7 minutes. Between 33 and 54 Sun Van trips each month have ride times of 105 minutes or more, which is 0.17 percent to 0.28 percent of all trips provided per month.

Each month, Sun Van managers also pull a random sample of trips with a length of 105 minutes or more and compare the travel times to similar trips made by fixed route, using the agency’s online Google trip planner. (Ride times generated by this trip planner include actual scheduled on-board time plus estimated walk times and wait times for any transfers.) Reviewers examined Sun Van’s analysis for the month of June 2016. Of the 33 randomly selected trips, three were found to have Sun Van travel times that exceeded the agency’s 30-minute standard for comparable fixed route travel time.

### Comparison of ADA Paratransit and Fixed Route On-Board Ride Times

To determine whether Sun Van ride times are comparable to fixed route ride times, the review team compared travel times on both modes for a sample of 30 trips taken during September 2016. ABQ Ride staff generated a special report showing all ADA paratransit trips performed in September 2016 with actual ride times over 60 minutes. These totaled 19,931 (6.2 percent of total trips). Reviewers then selected a random sample of 30 long trips. Using ABQ Ride’s online Google trip planner, team members identified the total travel time necessary to complete each trip using fixed route service.

The following table shows the results of this comparison. Travel times using Sun Van were considered acceptable if they were within 30 minutes of the equivalent travel using fixed route, excessive if longer than fixed route travel by 30 minutes or more. Of the 30 sample Sun Van trips, 23 (77 percent) showed travel times shorter than or similar to fixed route trip lengths. Seven trips (23 percent) showed longer time spent on the vehicle than if fixed route had been used. Two trips (almost seven percent) were longer by 30 minutes or more.

<b>ABQ Ride Sun Van: ADA Paratransit/Fixed Route Trip Length Comparison</b> <b>Selected Trips Exceeding 60 Minutes</b> <b>September 2016</b>			
	<b>Trips Examined</b>	<b>Percentage of Sample Trips</b>	<b>Average Time Difference (minutes)</b>
Trip length less than fixed route	23	77%	-22
Trip length similar to fixed route	0	0%	0
Trip longer than fixed route	7	23%	26
by less than 30 minutes	5	16.6%	-
by 30 minutes or more	2	6.6%	-
<b>Total</b>	<b>30</b>	<b>-</b>	<b>-</b>

### **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 to ADA eligible people. A deficiency was found with ABQ Ride Sun Van's on-time drop-off performance. A deficiency was also found with ABQ Ride's monitoring of telephone hold times.

The review team examined how ABQ Ride defines on-time drop-offs and telephone hold times and the standards set for on-time drop-off performance and telephone performance. Team members then examined ABQ Ride's reported on-time drop-off performance and telephone queue length. To verify reported performance independently, reviewers calculated on-time drop-off performance for a random sample of trips made during the sample week (September 18 to 24, 2016). Finally, team members observed the trip reservations, scheduling and dispatching locations to see first-hand how appointment and drop-off times are handled.

#### On-Time Drop-Offs

Reviewers noted that the "Sun Van & You" rider's guide offers riders the option of scheduling trips by appointment time. First-hand observations of the reservations process indicated that

reservationists ask riders “Would you like to book that by requested time or appointment time?” when booking the first leg of trips. “Requested time” is understood by riders to mean requested pickup time. When riders do indicate an appointment time, reservationists enter the time in the Trapeze system.

First-hand observations and a review of trip records indicated that the large majority of riders preferred to book the first leg of trips by requested pickup time. For example, a review of August 2016 trip records showed that six percent of all trips were booked by appointment time.

Reviewers noted while observing the trip booking process that riders sometimes asked for pickup times which assumed unrealistically short travel times. For example, one rider initially asked for a 12:30 p.m. pickup time. When the reservationist offered a 1:30 p.m. pickup time, the rider revealed an appointment time, stating: “But I need to be there by one o’clock.” The rider had made the initial request allowing only 30 minutes travel time.

Although appointment times are entered into the Trapeze system, the review team noted that appointment times are not printed on driver run manifests. First-hand observations of the dispatch process also found that appointment times were not monitored by dispatchers. Appointment times were not on the part of the dispatch screen that was immediately visible to dispatchers.

Reviewers also found issues with the way the Trapeze parameters were set for booking and scheduling trips based on appointment times. The “Tolerance – Drop-off early” parameter was set to be 15 minutes before the stated appointment time, and the “Tolerance – Drop-off late” parameter was set for 15 minutes after the stated appointment time. These settings would result in scheduling options that would get riders to appointments no more than 15 minutes early, but also would allow scheduling options that get riders to appointments up to 15 minutes late. Perhaps more troubling, though, reviewers noted that “Tolerance – Apply to Drop-off” parameter was set to “No,” which has the effect of instructing the Trapeze system to not consider early and late drop-off settings at all when scheduling trips that are booked with appointment times.

In its written response to FTA’s initial information request, ABQ Ride stated that it defines an on-time drop-off to be: “If the Sun Van drops off the rider before the rider’s scheduled appointment time, and no more than thirty (30) minutes before the scheduled appointment time.” ABQ Ride also indicated a goal of 90 percent on-time drop-offs. ABQ Ride’s definition of on-time drop-offs is not consistent with the software parameter settings noted above. To be consistent with the stated definition, the “Tolerance – Drop-off early” parameter should be set to 30 and the “Tolerance – Drop-off late” parameter should be set to zero (0).

#### *Recorded On-Time Drop-off Performance*

ABQ Ride does not include on-time drop-off performance data in its monthly Sun Van Advisory Board reports. Data for trips booked by appointment is, however, recorded in the Trapeze system and can be tabulated using available reports. Reviewers requested “On Time Performance Reports” for July and August 2016. These reports indicated that drop-offs were late 12 percent of the time in July and 14 percent of the time in August. It was noted, however,

that these reports could be using the drop-off window (tolerance) settings, which allow drop-offs to be up to 15 minutes after the appointment time.

### *Calculated On-Time Drop-off Performance*

To obtain an independent measure of on-time drop-off performance, the review team extracted data for all trips booked by appointment times for the five-day period from Monday, September 19, 2016 through Friday, September 23, 2016. A total of 76 trips were identified in this sample. Actual arrival times at destinations were compared with appointment times recorded in the system. Drop-offs were considered on-time if made on or before the appointment times. As shown below, the analysis showed that drop-offs were on time for 78 percent of the trips in this sample. Nine of the 17 late trips in the sample were one to 15 minutes late, three were 16 and 30 minutes late, and five were more than 30 minutes late.

<b>ABQ Ride Sun Van: Independent Calculation of On-Time Drop-Off Performance September 19 - 23, 2016</b>			
	<b>Number</b>	<b>Number</b>	<b>Percentage</b>
Trips in Sample	76	-	100%
On-time (on or before appointment time)	59	-	78%
Late (after appointment time)	17	-	22%
1-15 min late	-	9	-
16-30 min late	-	3	-
>30 min late	-	5	-

**Corrective Action and Schedule:** Within 60 days of the issuance of the final report, ABQ Ride must provide to the FTA for review:

- documentation that on-time drop-off parameters in the Trapeze system have been reviewed with the software company and corrected, as appropriate.
- documentation that appointment times have been added to driver run manifests and that dispatcher screens have been modified to include appointment times in the immediate visible portion of the screen.
- a plan of action for improving on-time drop-off performance.

### Telephone Performance

ABQ Ride uses a Cisco telephone system with Finesse Call Manager software. Three T1 lines provide connectivity. Each T1 line is capable of handling 23 calls, so the total capacity of the system is 69 calls at any given time. The phone system and T1 lines serve the entire Transit Department.

Sun Van reservationists handle calls on two call groups. The first call group is for all Sun Van calls. The second call group is for fixed route customer service (general information and trip planning calls). The City's 311 call center is advertised as the primary fixed route customer service point of contact and handles most of these calls. Some riders still call the Transit

Department, though, which used to be the primary customer service point of contact. The Cisco system is programmed to give priority to calls in the Sun Van call group queue.

The Sun Van reservations unit handles all Sun Van calls between the hours of 8 a.m. and 5 p.m., seven days a week, 365 days a year. This includes reservations, cancellation, Where's My Ride?, trip confirmation, and general information calls. During the hours when reservationists are on duty, no calls are taken directly by dispatchers. For Where's My Ride? calls, reservationists can access the Trapeze dispatch screen to give callers information about expected arrival times. If trips are running late, reservationists use internal connections to contact dispatchers and then relay information from dispatchers to riders. After hours, when reservationists are not on duty, all calls are directed to the dispatch center which is staffed during all hours of Sun Van operation.

ABQ Ride has eight budgeted reservationist positions. At the time of the review, four of these positions were vacant. Three of the four vacant positions are filled by contract employees, provided through a local employment company. Seven reservationists are scheduled to work on Mondays, Tuesdays and Thursdays, six on Wednesdays, and eight on Fridays. Three work on Saturdays and two work on Sundays and holidays. All work schedules are from 8 a.m. to 5 p.m. Fridays are the busiest call days since this is the one day when riders can book trips up to five days in advance. Riders can only book trips up to three days in advance on all other days.

The Cisco Finesse system has remote monitoring capability which allows Sun Van managers to monitor calls, the size of the queue, and hold times in real time. Two managers share responsibility for real-time call center monitoring and call-in other staff to assist as needed. Both managers also will take Sun Van calls during busy call times.

In its written response to FTA's initial information request, ABQ Ride indicated that its standard and goal is to answer 90 percent of all Sun Van calls within three minutes, 95 percent of all calls within five minutes, and 100 percent of calls within eight minutes.

At the time of the review, IT staff noted that ABQ Ride had limited access to the Cisco Finesse reporting module. ABQ Ride has access to aggregate, monthly call volume and hold time report, but did not have access to reports that show hold times by hour of the day. Staff indicated that they were in communication with the City IT staff to negotiate better reporting capability.

At the request of the review team, ABQ Ride IT staff prepared special reports of Sun Van call hold times for the week of September 18 to 24, 2016. Staff was able to access raw individual call data and aggregate it by day and hour. The daily reports were designed to allow actual performance to be compared to the standard/goal established by ABQ Ride.

The following tables show the number and percentage of daily calls answered within three minutes, five minutes and eight minutes. As shown, ABQ Ride met its standard/goal to answer 90 percent of calls in three minutes, 95 percent in five minutes and all calls within eight minutes on one day - Thursday, September 22. The standard/goal was almost met on four other days - Monday, Tuesday, Wednesday and Saturday. The goal was not met on Sunday or Friday. On Sunday, September 18, only 53.9 percent of calls were answered in three minutes, 71 percent in



five minutes, and 89.6 within eight minutes. On Friday, September 23, only 64.8 percent of calls were answered in three minutes, 73 percent in five minutes, and 78.8 within eight minutes.

Sun Van managers noted that on Sunday, September 18, one of the two reservationists scheduled to work called out sick. Managers indicated that performance on Fridays is typically below standard, particularly in the first two hours of the day (8 to 10 a.m.) because of the volume of calls.

### **ABQ Ride Sun Van Telephone Performance – September 18 - 24, 2016**

#### **Hold Time to Answer -Reservations Group (All Sun Van Calls)**

	<b>NUMBER OF CALLS ANSWERED IN 3, 5, 8 AND 8+ MINUTES</b>				<b>Total Calls</b>
	<b>Answered in 3 Min.</b>	<b>Answered in 3+ to 5 Min.</b>	<b>Answered in 5+ to 8 Min.</b>	<b>Answered in 8+ Min.</b>	
<b>Sunday, September 18</b>	<b>130</b>	<b>41</b>	<b>45</b>	<b>25</b>	<b>241</b>
<b>Monday, September 19</b>	<b>775</b>	<b>15</b>	<b>37</b>	<b>21</b>	<b>848</b>
<b>Tuesday, September 20</b>	<b>722</b>	<b>28</b>	<b>16</b>	<b>42</b>	<b>808</b>
<b>Wednesday, September 21</b>	<b>565</b>	<b>39</b>	<b>44</b>	<b>0</b>	<b>648</b>
<b>Thursday, September 22</b>	<b>533</b>	<b>26</b>	<b>7</b>	<b>0</b>	<b>566</b>
<b>Friday, September 23</b>	<b>612</b>	<b>78</b>	<b>55</b>	<b>200</b>	<b>945</b>
<b>Saturday, September 24</b>	<b>203</b>	<b>21</b>	<b>7</b>	<b>2</b>	<b>233</b>

	<b>PERCENT OF CALLS ANSWERED IN 3, 5, 8 AND 8+ MINUTES</b>				<b>Total Calls</b>
	<b>Answered in 3 Min. Goal=90%</b>	<b>Answered in 5 Min. Goal=95%</b>	<b>Answered in 8 Min. Goal=100%</b>	<b>Answered in 8+ Min. Goal=0%</b>	
<b>Sunday, September 18</b>	<b>53.9</b>	<b>71.0</b>	<b>89.6</b>	<b>10.4</b>	<b>241</b>
<b>Monday, September 19</b>	<b>91.4</b>	<b>93.2</b>	<b>97.5</b>	<b>2.5</b>	<b>848</b>
<b>Tuesday, September 20</b>	<b>89.4</b>	<b>92.8</b>	<b>94.8</b>	<b>5.2</b>	<b>808</b>
<b>Wednesday, September 21</b>	<b>87.2</b>	<b>93.2</b>	<b>100.0</b>	<b>0.0</b>	<b>648</b>
<b>Thursday, September 22</b>	<b>94.2</b>	<b>98.8</b>	<b>100.0</b>	<b>0.0</b>	<b>566</b>
<b>Friday, September 23</b>	<b>64.8</b>	<b>73.0</b>	<b>78.8</b>	<b>21.2</b>	<b>945</b>
<b>Saturday, September 24</b>	<b>87.1</b>	<b>96.1</b>	<b>99.1</b>	<b>0.9</b>	<b>233</b>

ABQ Ride IT staff also developed data by hour of the day for the sample week. The following tables show the number of calls answered and the average hold time for calls answered by hour. As shown, call volumes were largest and average hourly hold times longest on weekdays during the first one to two hours of the day. Volume and hold times were especially high and long on Friday morning. There were no pronounced peaks in demand on Sunday, but hold times were long throughout the day, which is consistent with being short-staffed all day.

**ABQ Ride Sun Van Telephone Performance – September 18 - 24, 2016**  
**Calls Volume and Average Hold Times by Hour – Reservations Group (All Sun Van Calls)**

	Number of Calls Answered								
	8-9	9-10	10-11	11-12	12-1	1-2	2-3	3-4	4-5
Sun. Sept. 18	37	29	24	20	23	19	27	32	30
Mon. Sept. 19	166	123	109	67	51	82	89	89	72
Tue. Sept. 20	157	97	81	71	81	87	75	74	85
Wed. Sept. 21	110	68	72	69	47	48	83	78	73
Thu. Sept. 22	92	71	67	68	39	45	64	70	50
Fri. Sept. 23	234	134	97	94	63	83	78	84	78
Sat. Sept. 24	31	22	35	26	24	17	22	24	32
	Average Hold Time (mm:sec)								
	8-9	9-10	10-11	11-12	12-1	1-2	2-3	3-4	4-5
Sun. Sept. 18	3:24	2:40	2:06	4:21	3:19	6:54	3:15	3:15	4:28
Mon. Sept. 19	3:22	0:27	0:10	0:20	0:27	0:18	0:17	0:22	0:08
Tue. Sept. 20	4:16	0:51	0:34	0:59	0:48	0:30	0:13	0:29	0:12
Wed. Sept. 21	2:58	0:08	0:21	0:40	0:29	2:47	0:42	0:52	1:11
Thu. Sept. 22	0:44	0:15	0:15	1:56	0:10	0:09	0:19	0:23	0:10
Fri. Sept. 23	11:19	2:58	0:32	1:29	0:24	1:19	0:40	1:27	0:11
Sat. Sept. 24	0:38	2:11	1:14	0:44	2:50	1:09	1:42	0:53	0:19

**Corrective Action and Schedule:** Within 60 days of the issuance of the final report, ABQ Ride must provide to the FTA documentation of more sufficient telephone reporting and monitoring. Enhanced reports should be designed to allow ABQ Ride to determine if it is meeting established standards/goals for telephone performance. Reports and monitoring should also be done by day and by hour of the day.

#### Vehicle Fleet and Vehicle Availability

To determine if there are presently sufficient vehicles available to cover scheduled runs with an adequate supply of spare vehicles, the review team examined ABQ Sun Van's fleet roster, run structure and daily vehicle availability records.

ABQ Ride owns a fleet of 78 body-on-chassis minibuses that it uses to operate the Sun Van service. Thirty-eight vehicles are model year 2012 with between 120,437 and 162,508 miles of service. Forty are 2016 model year with between 24,526 and 44,172 miles of service. As discussed later in this section, ABQ Ride's capital replacement plan calls for the older 2012 model year vehicles to be replaced in the current and next fiscal years.

Reviewers examined dispatch run lists for the week of September 18 to 24, 2016. From the lists, reviewers determined the total number of runs scheduled as well as the peak vehicle requirement. Reviewers then examined the daily maintenance reports for that week that show the number of

vehicles held out of service for repairs. By comparing information from these two sources, reviewers determined if there were an adequate number of vehicles to meet pullout.

On weekdays for that sample week, the Sun Van scheduler created between 58 and 65 total runs. A similar number of vehicles were required since, except for 11 to 14 split runs operated on the same vehicles by the same drivers, Sun Van does not deploy the same vehicles on two consecutive shifts (double-shifting). Between 11 and 15 vehicles were held out for repairs that week. With a total fleet of 78 vehicles, this left between 63 and 67 vehicles available for service each day. There were an adequate number of vehicles to cover all scheduled runs that week. On some weekdays, there were a limited number of spares. Dispatchers explained that, even though it is not typical practice, vehicles can be double-shifted if needed. Dispatchers also said that they do not have to close runs due to a lack of available vehicles.

### Driver Availability

Reviewers interviewed the ABQ Ride Human Resources Manager and examined the driver roster, driver turnover, and driver availability to determine if there were enough drivers to operate all scheduled runs. ABQ Ride managers provided a driver roster that showed 84 approved driver positions. Seventy-eight of the positions were filled at the time of the review and six were vacant. Of the 78 drivers employed, six were recent hires that were still in training. A total of 72 drivers were therefore available to provide Sun Van service.

Reviewers also examined employment records for the 12 months prior to the review. Records indicated that 41 drivers had left or had been terminated. This suggests an annual driver turnover rate of 53 percent.

ABQ Ride managers noted that keeping a full roster of drivers is a challenge. They indicated that they are always recruiting and training new drivers. They noted that they would like to have all approved driver positions filled but are unable to recruit and train enough drivers to offset the number who leave or who are terminated.

The Sun Van scheduler noted that availability of drivers determines how many runs can be scheduled each day. He indicated that on certain weekdays it would be helpful to have more drivers to allow more runs to be created. Both the ABQ Ride managers and the Sun Van scheduler felt that on-time performance could be improved if the vacant driver positions were filled and more capacity was available to handle not only scheduled trips but same-day changes and service issues.

Sun Van dispatchers noted that there are enough drivers to cover scheduled runs. They indicated that 14 are scheduled as extraboard drivers and this number is sufficient to cover same-day call-outs. Dispatchers noted that they typically do not close runs for lack of drivers. They noted, though, that a few additional drivers and runs would provide capacity to respond to same-day issues and would likely improve on-time performance.

### Planning; Capital and Operating Budgeting

With regard to planning, capital and operating budgeting, ABQ Ride provided the following information. The review team was able to verify that ABQ Ride budgets and plans to meet all ADA paratransit demand, and that the agency's long-range planning effort attempts to anticipate needs for vehicles, technology and communications upgrades.

**City of Albuquerque ADA Paratransit  
Expenditures & Ridership: FY14 - FY16**

	<b>FY14</b>		<b>FY15</b>		<b>FY16</b>	<b>TOTAL</b>
<b>OPERATING</b>	\$ 8,823,286		\$ 8,355,730		\$ 8,376,126	\$ 25,555,142
<b>CAPITAL</b>	-		-		\$ 3,457,640	\$ 3,457,640
<b>TOTAL</b>	<b>\$ 8,823,286</b>		<b>\$ 8,355,730</b>		<b>\$ 11,833,766</b>	<b>\$ 29,012,782</b>

<b>RIDERSHIP</b>	244,645		251,234		258,219
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<b>Van Purchases</b>	0		0		40
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## 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 as part of the ADA paratransit program or with how the transit agency communicates this requirement to eligible riders and potential users of the service.

The review team observed that for the six-month period from April through September 2016, subscription service accounted for between 17.5 and 18.8 percent of all Sun Van trips provided. ABQ Ride's policy and practice is to have no capacity denials and reports no capacity denials in the last three fiscal years. Reviewers observed no indications suggesting that there are capacity denials in the Sun Van service.

## 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, no deficiencies were found with the requirements concerning the transit agency’s no-show and late cancellation policies, the reasonableness of proposed suspension periods and the required process for appealing proposed suspensions of service, or with how the transit agency communicates these requirements to eligible riders and potential users of the service.

Reviewers observed that the agency’s tracking of no-shows, rider communications concerning these, and handling of suspensions and appeals appears appropriate.

### Agency Policy

ABQ Ride’s written Late Cancellation/No-Show Suspension Policy specifically excludes no-shows beyond the rider’s control, considers frequency of use, communicates the rider’s right to appeal, and imposes reasonable, progressive sanctions. No-shows are defined properly on page 16 of “Sun Van & You”.

ABQ Ride’s policy provisions, spelled out in “Sun Van & You” and on the agency website, specify:

- Cancellations can be made without penalty up to two hours prior to negotiated trip time. Cancellations made less than two hours before travel time are considered no-shows.
- Vehicle must arrive within the 30-minute window; driver will wait at least five minutes.
- Penalties will be imposed only when a rider reserves five or more trips within any month; no-shows 30 percent or more of those scheduled trips; and no-shows more than two trips in one month.

- Within a rolling 12-month period, the first violation within a calendar month will result in a warning letter. A second violation within a second calendar month will trigger a three-day suspension; a third violation within a third calendar month, a seven-day suspension.
- Should a fourth violation occur within a fourth calendar month, the suspension length will be determined by the independent Appeals Subcommittee of ABQ Ride's paratransit advisory committee.
- ABQ Ride managers added that the agency's practice is to attempt to contact the rider by telephone before issuing a no-show.

ABQ Ride's policy states that riders will receive written notification about any proposed service suspension, listing the dates of any no-shows and providing instructions about the appeal process. Riders must request an appeal within 14 days from the letter date. If an appeal is filed, the rider may continue to use Sun Van service until a decision is made; ABQ Ride will provide free transportation to attend the hearing. The policy states that a written decision will be provided within 30 days of the appeal.

#### Handling of No-Shows, Suspensions, and Appeals

Sun Van tracks and monitors riders' accumulation of no-shows and the progression of no-show sanctions throughout the year. The transit agency reports no-show data each month to its paratransit advisory committee. Reviewers examined no-show and service suspension records to verify that ABQ Ride appropriately tracks and monitors no-shows and suspensions; that suspension notices state that the rider has the right to appeal and provide the required information and materials to do so; and that the appeal process offers appropriate separation of functions, stays the suspension of service, and meets regulatory requirements for timing.

Review team members examined vehicle manifests for September 2016 to ascertain whether drivers had properly coded a random sampling of 50 missed trips, no-shows, and late cancellations, comparing the date and time with the pickup window of each trip request. The results of this analysis showed that of the 50 sample trips, 48 were coded correctly (47 no-shows, one missed trip). Two missed trips were incorrectly coded as no-shows (in one instance, the vehicle arrived three minutes outside the 30-minute window; in the other, five minutes outside).

## **6.7 Complaint Resolution and Compliance Information**

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

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

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

**Discussion:** During this compliance review, no deficiencies were found with the requirement to designate an individual to coordinate compliance with DOT ADA regulations. No deficiencies were found with the requirement to resolve complaints promptly and equitably and keep summaries of complaints on file. No deficiencies were found with the requirement to resolve complaints promptly and communicate the resolution to complainants. No deficiencies were found with the requirement to advertise sufficiently the process for filing complaints, or with retention of records. An Advisory Comment, however, is made regarding one aspect of the complaint handling process - the initial categorization of ADA-related complaints. Reviewers observed that the municipal 311 call center, which receives and logs all ABQ Ride complaints (fixed route and ADA paratransit), does not always correctly categorize ADA related complaints. Or these may simply be lumped together as “unclassified”. These practices can skew complaint data and impede its effective use. Because accurate complaint data is essential in identifying service delivery issues and gauging service quality, Sun Van personnel must then verify and, often, re-classify complaints by subject.

Riders may submit complaints through the City of Albuquerque 311 Citizen Contact Center, a municipal customer service. This service enters complaints into the city’s computerized public records system. In addition, ABQ Ride solicits comments from riders. Page 22 of “Sun Van & You” invites customer comments or complaints and includes the phone number and mailing address to be used. The agency website offers two telephone numbers and a mailing address for comments and complaints.

The review team examined public information regarding rider comments and complaints as well as ABQ Ride’s complaint policies and procedures. Managers stated and team members verified that ABQ Ride retains complete complaint records for fixed route and ADA paratransit service in its electronic database indefinitely, far beyond the required one year for copies of the complete complaint and five years for complaint summaries. After interviewing the person designated to handle Sun Van complaints, reviewers examined and tabulated all ADA-related complaints submitted to ABQ Ride for the fiscal years of 2016 and 2017, inspected the electronic system used by ABQ Ride to record, track and store all customer comments, whether fixed route or ADA paratransit, and reviewed the handling of the 98 Sun Van complaints received during July through October, 2016.

Reviewers found that ABQ Ride’s complaint policies and procedures are spelled out in internal agency documents. With regard to complaint handling procedures, ABQ Ride has designated a Sun Van customer service supervisor as the person responsible for managing Sun Van’s complaint process. As previously discussed, Albuquerque’s municipal call center receives complaints, enters the information into the agency’s database, and electronically forwards reports to the Sun Van offices. ABQ Ride requires that these be researched and responded to within two weeks. In support of complaint investigation and follow-up, ABQ Ride records incoming reservations calls to enable investigation of complaints about the handling of trip requests and

scheduling, and can review video to investigate Sun Van customer complaints, public safety concerns and general service issues.

ABQ Ride lists ADA paratransit complaints using 11 categories and includes this information in its monthly paratransit advisory committee reports. For the four months ending November 1, 2016, Sun Van complaints totaled 98, averaging approximately 25 per month. The agency provided documentation showing investigation and where appropriate, response to the customer. Handling time ranged from same day to 21 days, with almost all complaints being investigated, responded to and closed out within seven days. Reviewers calculated that approximately 30 percent of these complaints were capacity-constraint-related (totaling 29 for the four-month period) and 70 percent, non-constraint-related (e.g., safety, ride comfort, lost and found, incident report). These totals include both valid and unfounded complaints. Capacity-constraint-related complaints included the following:

- No-show disputes 6 (6 percent)
- On-time performance 18 (18 percent)
- Driver failure to assist 3 (3 percent)
- Telephone access 2 (2 percent)
- Overly long trips 0
- Service denials 0

During this same four-month period, the Sun Van program provided 90,797 trips to eligible riders.

**Advisory Comment:** It is an effective practice to monitor customer complaints in assessing service quality. However, to identify and resolve issues of scheduling, on-time performance, trip length, telephone performance and the like, complaints must be accurately classified by subject.

## 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 denying service to people with disabilities on the basis of disability, including and not limited to: requiring persons with disabilities to use ADA paratransit instead of the fixed-route system, requiring paratransit-eligible riders and potential applicants to use other special transportation services rather than the ADA paratransit service (such as may be operated by social and/or human-services agencies); requiring persons with disabilities to travel with PCAs; or imposing user fees or special charges upon people with disabilities and requiring people with disabilities to use designated priority seating.



Review team members examined the rider's guide, website, and other service information; operating procedures and training manuals for eligibility, reservations, scheduling, dispatch, and customer service personnel. These materials were compared with service and eligibility data and information gathered during on-site observations, meetings, interviews, and vehicle and facility inspections. Reviewers identified no discrepancies between ABQ Ride's published policies and standards concerning discrimination against persons with disabilities in connection with the provision of transportation and the procedures and practices followed by ABQ Ride Sun Van managers and personnel. Sun Van's printed and website policies and procedures contain no references to the "Common Wheelchair". The agency does not impose special charges for providing required accessible services to individuals with disabilities. No evidence suggested that persons with disabilities were being steered to alternate transportation services during eligibility, reservations, or other processes, and there were no indications that eligible riders were being required to be accompanied by an attendant.

ABQ Ride's website contains information about the Paratransit Advisory Board (PTAB), the agency's disability advisory group. PTAB is composed of volunteers who meet bi-monthly. This committee provides information and counsel to ABQ Ride concerning the provision of public transportation services for individuals with disabilities and provides education to the general public about these transportation needs. Meeting details and information on how to participate are posted at <https://www.cabq.gov/transit/our-department/paratransit-advisory-board-ptab>.

## 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 requirement to train personnel to proficiency as appropriate to their duties or with how Sun Van communicates, manages and/or oversees training requirements with respect to agency staff.

The review team examined Sun Van training curricula and materials, met with the operations manager and lead trainer, and also interviewed drivers to ascertain their familiarity with the agency's operating policies and procedures.

Sun Van drivers are municipal employees, as is the department's trainer and safety manager. Drivers must undergo a minimum of 80 hours of classroom instruction covering service policies and procedures, ADA requirements; defensive driving; passenger assistance techniques, a four-hour unit; four hours of CPR; safe equipment operation; enhanced map reading (eight hours); and disability awareness and sensitivity, another four-hour unit taught by a local disability organization. Trainee drivers then receive 80 hours of behind the wheel training, which includes additional map reading, additional passenger assistance training, and instruction in use of onboard computers, lift operation and proper securement of mobility devices and passengers.

This is followed by up to two weeks of ride-along training with a senior driver (also known as cadet training, or accompanied driving). At each stage, trainee drivers must demonstrate proficiency/mastery in the safe operation of all equipment, including lifts, ramps, and securements, before progressing on to new material. Managers also noted that the transit agency's training records must be accurate, up to date, and available for inspection at any time.

The review team interviewed eight drivers, including both new hires and long-timers. Drivers were asked whether the training provided adequately prepared them for the job; to describe the on-time performance window; to describe no-show procedures; and to indicate the level of assistance provided to riders. Reviewers learned the following:

- *On-Time Window:* All drivers understood and correctly described the on-time window as 15 minutes before the scheduled pickup time to 15 minutes afterward.
- *Customer No-Shows:* All drivers understood and correctly described the agency's no-show procedures, which include waiting at least five minutes within the on-time window, always contacting dispatch before recording riders as no-shows, and correctly entering the customer no-show on the manifest.
- *Origin-to-Destination Service:* All drivers correctly described the requirement to provide door-to-door service for all riders, and confirmed that driver assistance must be made available to passengers upon request or whenever needed due to disability. They discussed details of this service with members of the review team.
- *Training:* All drivers indicated that the training they received adequately prepared them for the job, several noting that they felt the training was thorough and to proficiency.
- *Driver Shortage:* Several drivers referred to vacant positions, saying they hoped the agency would be able to bring additional drivers on board soon.

## 6.10 Service Under Contract with a Private Entity (if applicable)

**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:** This provision is not applicable to ABQ Ride. The City's Transit Department operates the Sun Van service completely in-house. ABQ Ride does not contract with private entities for the provision of Sun Van service.

## 6.11 Service Provided by Another Public Entity (if applicable)

**Requirement:** Part 37 of title 49, Code of Federal Regulations, applies to any public entity that provides designated public transportation or intercity or commuter rail transportation. Under 49 CFR §37.21(b), for entities receiving Federal financial assistance from the Department of Transportation, compliance with the applicable requirements of Part 37 is a condition of 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 ABQ Ride. No public entities provide ADA complementary paratransit service on behalf of this transit agency.

## 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 ABQ Ride's efforts to coordinate service with other fixed route operators with overlapping or contiguous service areas or jurisdictions. An advisory comment is made regarding possible future coordination with the Rio Metro Regional Transit District (RMRTD).

ABQ Ride managers indicated that there are no other entities with contiguous or overlapping service areas or jurisdictions which currently operate ADA paratransit service. As previously discussed in Section 6.4, managers did note, however, that the Rio Metro Regional Transit District (RMRTD) serves the City of Rio Rancho, which borders Albuquerque to the north. RMRTD and ABQ Ride have a funding Agreement that allows ABQ Ride to extend one of its routes (Route 155) across the border and into the City of Rio Rancho. It was also confirmed that this route is not a commuter route. RMRTD operates limited general public demand responsive service in Rio Rancho, but does not currently provide ADA paratransit service.

Reviewers noted that under the Agreement, RMRTD is responsible for operating any ADA paratransit service in Rio Rancho. If this service is provided, ABQ Ride and RMRTD should coordinate to allow ADA paratransit eligible riders to have the same inter-area travel opportunities as fixed route riders.

**Advisory Comment:** It would be advisable for ABQ Ride to inform RMRTD of its likely obligation to provide ADA paratransit service. If this service is then provided, ABQ Ride and RMRTD should coordinate to ensure that seamless ADA paratransit service is available along the Route 155 corridor.

## Summary Table of Compliance Review Findings

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Suggested Corrective Action	Response Days/Date
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)	D	Deficiencies were found with the application of eligibility standards, specifically consideration of an applicant's ability to travel throughout the service area.	ABQ Ride must provide to the FTA for review a revised eligibility policy statement and letter templates which reflect consideration of an applicant's ability to travel throughout the service area.	Within 60 days of the issuance of the final report
4	Accessible information	37.125(b)	ND	-	-	-
5	Eligibility determinations within 21 days	37.125(c)	ND	-	-	-

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Suggested Corrective Action	Response Days/Date
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 that provide specific reasons for decisions in cases of temporary, conditional, or non-eligibility. ABQ Ride letters finding applicants not eligible do not provide specific reasons for the decisions.	ABQ Ride must provide to FTA for review: revised letter templates and copies of recent determination letters that include specific, transit-based reasons for determinations of ineligibility, temporary or conditional eligibility, and for any limitations on eligibility.	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 conditional eligibility	37.125(g)	D	Deficiencies were found with the requirements for the administrative appeals process for eligibility: Appeal decision letters upholding original decision or continuing to place limits on eligibility do not provide specific reasons for the decisions.	ABQ Ride must provide to the FTA for review an updated appeal decision notification letter template which provides specific reasons for any hearing decision which upholds the original determination or continue to place limitations on eligibility.	Within 60 days of the issuance of the final report

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Suggested Corrective Action	Response Days/Date
9	Complementary paratransit for visitors	37.127	ND	-	-	-
10	Types of service	37.129	ND	-	-	-
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	-	-	-
	Absence of capacity constraints	37.131(f)	D	See below	See below	-

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Suggested Corrective Action	Response Days/Date
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)	D	Deficiencies were found with the requirement that ADA paratransit service be provided without substantial numbers of significantly untimely pickups for initial or return trips.	ABQ Ride must provide to the FTA a plan of action for improving on-time pickup performance.	Within 60 days of the issuance of the final report
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	-	-	-



Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Suggested Corrective Action	Response Days/Date
22	No operational patterns or practices significantly limiting service availability	37.131(f)	D (on-time drop-offs)	<u>On-time drop-offs</u> : Deficiencies were found with regard to on-time drop-offs. Review team calculations for a sample week suggest on-time drop-off performance of 78 percent. ABQ Ride reports indicate 86 to 88 percent, but may include drop-offs up to 15 minutes late.	ABQ Ride must provide to the FTA for review: <ul style="list-style-type: none"> <li>• Documentation that on-time drop-off parameters have been reviewed and correct.</li> <li>• Documentation that appointment times have been added to run manifests and the immediately visible portions of dispatch screens.</li> <li>• A plan of action for improving on-time drop-off performance</li> </ul>	Within 60 days of the issuance of the final report

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Suggested Corrective Action	Response Days/Date
	-	-	D (telephone performance monitoring)	<u>Telephones</u> : A deficiency was found with ABQ Ride's monitoring of telephone performance. ABQ Ride did not have the capability to generate hold time reports by day and hour of the day.	ABQ Ride must provide FTA with documentation of more sufficient telephone performance monitoring and reporting.	Within 60 days of the issuance of the final report
23	Subscription Service	37.133	ND	-	-	-
24	No-show, late cancel and reasonable service suspension & appeal policies	37.125(h) (1)-(3)	ND	-	-	-
25	Complaint Resolution & Compliance Information	27.13(b) & 27.121	Advisory Comment	It is an effective practice to monitor customer complaints in assessing service quality. However, to identify and resolve issues of scheduling, on-time performance, trip length, telephone performance and the like, complaints must be accurately classified by subject.	-	-
26	Non-discrimination	37.5	ND	-	-	-
27	Training	37.173	ND	-	-	-
28	Service under Contract	37.23	N/A	-	-	-

<b>Item</b>	<b>Requirement of 49 CFR Part 27 or 37 or 38</b>	<b>Reference</b>	<b>Site Visit Finding deficiency/no deficiency or advisory comment</b>	<b>Finding(s) of Deficiency</b>	<b>Suggested Corrective Action</b>	<b>Response Days/Date</b>
29	Service provided by another public entity	37.21(b)	N/A	-	-	-
30	Coordination of service	37.139(g)	Advisory Comment	It would be advisable for ABQ Ride to advise RMRTD on its possible ADA paratransit responsibilities and then coordinate efforts to provide seamless inter-area paratransit service along the Route 155 corridor.	-	-

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## Attachment A: – FTA Notification Letter to the City of Albuquerque Transit Department



U.S. Department  
Of Transportation  
Federal Transit  
Administration

Headquarters

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

July 11, 2016

Mr. Bruce Rizzieri  
Director  
The City of Albuquerque  
ABQ Ride  
100 1<sup>st</sup> Street, SW  
Albuquerque, NM 87102

Dear Mr. Rizzieri:

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 City of Albuquerque (ABQ RIDE) has been selected for a review of its complementary paratransit service to take place during the week of November 14, 2016.

The purpose of this review will be to determine whether ABQ RIDE 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 ABQ RIDE complementary paratransit service, and an exit conference. The entire on-site portion of the review will be completed within four days. FTA has engaged the services of 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 Tuesday, November 15, 2016, to introduce the Milligan team and FTA representatives to ABQ RIDE, including you or your designee, the paratransit service manager, the ADA coordinator, and other key staff. During the opening conference, the review team members will present an overview of the on-site activities.

Because review team members will spend considerable time on site during the week, please provide them with temporary identification and a workspace within or near the ABQ RIDE paratransit offices for the duration of their visit. Please let us know if you will designate a member of your staff to serve as ABQ RIDE'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 21 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](mailto:sswiacki@milligancpa.com).

Enclosure 2 consists of items that the Milligan team will review on-site beginning on November 15, 2016, after the opening conference.

We request the exit conference be scheduled for 11 a.m. on Friday, November 18, 2016, to afford an opportunity for the reviewers to discuss their observations with you and your agency. We request that you or your designee, the ABQ RIDE 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 ABQ RIDE, 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](mailto:anita.heard@dot.gov).

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

Sincerely,



John Day  
Program Manager for Policy and Technical Assistance  
Office of Civil Rights

cc: Robert C. Patrick, Regional Administrator, FTA Region VI  
Rebecca Rand, Regional Civil Rights Officer, FTA Region VI  
Sandra Swiacki, Milligan

City of Albuquerque (ABQ RIDE)  
Complementary Paratransit Compliance Review

Enclosure 1

**The following information must be submitted to Milligan within 21 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?)



**City of Albuquerque (ABQ RIDE)**  
**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



**City of Albuquerque (ABQ RIDE)  
Complementary Paratransit Compliance Review**

**Enclosure 2**

We request that the following information and/or assistance 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

**City of Albuquerque (ABQ RIDE)  
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)
  - 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: – City of Albuquerque Transit Department Response to Draft Report

**From:** brizzieri cabq.gov

**Sent:** Thursday, March 02, 2017 1:40 PM

**To:** Day, John (FTA)

**Cc:** Paez, Annette; Saiz, Sandra C.; Trujillo, Amanda J.

**Subject:** City of Albuquerque Transit: Sun Van Draft Report February 2017: Corrections

John:

Good afternoon.

The Transit Department has the following comments for the above report:

Page 22

First paragraph, last line

Bottom of chart

The text states that the denial rate is 5%. The chart states that the denial rate is 4%

Page 30

Last paragraph

The text that refers to paratransit service from the current funding Agreement with the Rio Metro Regional Transit District is as follows:

“The RMRTD shall assume all financial and operating responsibility for any required Americans with Disabilities Act (ADA) complementary paratransit services within any of the above route corridors that lie within an unincorporated area of Sandoval County or the City of Rio Rancho.”

Page 35

Last paragraph, next to last line

Change, “to notify the contractor”, TO “to notify the support service representative or dispatcher”

Page 36

First paragraph

FYI, “Advisory Committee on Transit For the Mobility Impaired” name was changed to the “Paratransit Advisory Board” in January 2015.

Page 38

First paragraph

“ACT” could be changed to “PTAB”

Page 42

Last paragraph, first and second line

Change “Committee” to “Board”

Thank you for the opportunity to provide comments.

Bruce



Bruce Rizzieri  
Director  
P.O. Box 1293  
Albuquerque, NM 87103  
Location: 100 First Street SW  
Main Tel.No. 505 724 3100  
Web: [www.myabqride.com](http://www.myabqride.com)