

**Central Arkansas Transit Authority
(CAT)**

Little Rock, Arkansas

**ADA Complementary Paratransit Service
Compliance Review**

November 2-5, 2009

Summary of Observations

Prepared for

**Federal Transit Administration
Office of Civil Rights
Washington, DC**

Prepared by

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with
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1 Purpose of the Review

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, and 38) include six service criteria, which must be met by ADA complementary paratransit service programs. Section 37.135(d) of the regulations required that ADA complementary paratransit services meet 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. As part of its oversight efforts, FTA, through its Office of Civil Rights, conducts periodic reviews of fixed route transit and ADA complementary paratransit services operated by federal grantees.

The purpose of these reviews is to assist the transit agency and the FTA in determining whether capacity constraints exist in ADA complementary paratransit services. The reviews examine policies and standards related to service capacity constraints such as those measured by on-time performance, on-board travel time, telephone hold times, trip denials, and any other trip-limiting factors. The reviews consider whether there are patterns or practices of a substantial number of trip limits, trip denials, early or late pickups or arrivals after desired arrival (or appointment) times, long trips, or long telephone hold times as defined by established standards (or typical practices if standards do not exist). The examination of patterns or practices includes looking not just at service statistics, but also at basic service records and operating documents, and observing service to determine whether records and documents appear to reflect true levels of service delivery. Input also is gathered from local disability organizations and riders. Technical assistance is provided to assist the transit operator in monitoring service for capacity constraints.

FTA conducted a review of ADA complementary paratransit service provided by the Central Arkansas Transit Authority (CAT) of Little Rock, Arkansas from November 2 to 5, 2009. Planners Collaborative, Inc., and TranSystems, Corp., both located in Boston, Massachusetts, conducted the review for the FTA Office of Civil Rights. The review focused primarily on compliance of CAT's ADA complementary paratransit service with the requirement in the DOT ADA regulations that this service be operated without capacity constraints (49 CFR § 37.131(f)).

The review also examined compliance of CAT's ADA paratransit service with the requirements related to eligibility determinations, rider-assistance policies, service area, response time, fares, trip purposes, days and hours of service, and coordination with other ADA paratransit services in the area. Sections 37.123 through 37.127 of the DOT ADA regulations require that a process be established for determining who is ADA paratransit eligible and that determinations of eligibility be made consistent with the regulatory criteria. Section 37.129(a) requires that ADA complementary paratransit be an origin-to-destination service. Section 37.131(a) requires that ADA complementary paratransit service be provided in all geographic areas where non-commuter fixed route service is provided. Section 37.131(b) requires that next-day service be provided. Section 37.131(c) requires that ADA complementary paratransit fares 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. Section 37.131(d) requires that ADA complementary paratransit service be provided without restrictions or priorities placed on trip purpose. Section 37.131(e) requires that

ADA complementary paratransit service be provided during all days and hours that fixed route service is provided. Section 37.139(g) requires that plans for ADA complementary paratransit service address efforts to coordinate with other public entities that have contiguous or overlapping ADA complementary paratransit service areas.

This report summarizes the observations and findings of the on-site review of CAT's ADA complementary paratransit service. Chapter 2 explains the approach and methodology used to conduct the review. Chapter 3 then describes key features of transit services provided by CAT (both fixed route bus and ADA complementary paratransit service). All of the findings of the review are summarized in Chapter 4. Chapter 5 includes observations and findings related to rider-assistance policies, service area, response time, fares, trip purposes, days and hours of service, and coordination with other public transit entities. Observations and findings related to the eligibility-determination process are presented in Chapter 6. Observations and findings related to the capacity constraint criteria, as well as additional observations on response time, are then presented in Chapters 7 through 10. Findings are presented at the conclusion of each chapter. Recommendations for addressing some of the findings are also provided.

CAT received a draft copy of this report for review and response. A copy of the response received from CAT on November 1, 2011 can be found in Attachment A.

2 Overview

This review focused primarily on compliance with the prohibition against capacity constraints for ADA complementary paratransit under DOT ADA regulations. The regulations identify several possible types of capacity constraints. These include waiting lists for trips, limits on the number of trips provided, and recurring patterns or practices that result in a significant number of trip denials or missed trips, untimely pickups, or excessively long trips. Capacity constraints also include other operating policies or practices that tend to significantly limit the amount of service to persons who are eligible for ADA complementary paratransit.

To assess each of these potential types of capacity constraints, the review focused on observations and findings regarding:

- Trip denials and wait-listing of trips
- Trip caps
- On-time performance, and
- Travel times

The review team also made observations and findings related to the following sets of policies and practices that could affect access to ADA complementary paratransit service:

- Rider-assistance policies
- Service area, response time, fares, trip purposes, and service times
- Coordination with other ADA complementary paratransit services in the area
- ADA complementary paratransit service eligibility process, and
- Telephone capacity

The review also addressed scheduling, dispatching, and operation of service as potential causes of or contributors to capacity constraints. Similarly, adequacy of resources was reviewed as a potential contributor to capacity constraints.

2.1 Pre-Review

The review first involved the collection and examination of key service information prior to the on-site review. This information included:

- A description of how CAT's ADA complementary paratransit service is structured
- Public information describing CAT's ADA complementary paratransit service, and
- CAT's standards for on-time performance, trip denials, travel times, and telephone service

At the request of FTA, CAT made additional information available during the on-site review, including:

- Copies of completed driver manifests for recent months
- 6 months of service data, including the number of trips requested, scheduled, denied, canceled, no-shows, missed trips, and trips provided
- A summary of trips requested, scheduled, and provided

- Detailed information about trips denied in the last six months, including origin and destination information, day and time information, and customer information
- Detailed information about trips identified in the last six months with excessively long travel times
- Telephone call management records, and
- Records of recent customer comments and complaints related to: trip denials, on-time performance, travel time, and telephone access

In addition to reviewing the above service data and information, the review team reviewed a complaint filed with FTA by a rider. The complaint alleged long ride times and the need to call to reserve trips two weeks in advance. Finally, the review team contacted a number of disability agencies and riders to get their input on recent experiences with the CAT ADA complementary paratransit service.

2.2 On-Site Review

The on-site review of the ADA complementary paratransit service took place from November 2 to November 5, 2009. The on-site review began with an opening conference, held at 9 a.m. on Monday, November 2, at the CAT offices at 901 Maple Street, North Little Rock. The following CAT staff members attended the opening meeting

- Betty Wineland, Executive Director
- Murray Gillerson, Transportation Director
- Sharon Hill, Paratransit Coordinator

Tom Procopio and Patricia Monahan of TranSystems and David Chia of Planners Collaborative represented the review team. Sue Clark of FTA's Office of Civil Rights in Washington, DC, participated via telephone. Sue Clark opened the meeting by thanking CAT for making their operations available for the review. She indicated that the review was CAT was selected for an ADA review due in part because of the Triennial Review findings and the substantive allegation raised in a complaint filed with FTA. She further indicated that the review team would strive to conduct the review with as little disruption of the day-to-day operations of service as possible. She urged CAT to take advantage of the review team's knowledge and expertise while they were on site. She further stated that she hoped that the review would prove to be beneficial to CAT and that FTA was available to provide assistance. She invited CAT to contact her directly if there were any concerns about the review.

CAT indicated that they had just been through an FTA Triennial Review. The Triennial Review resulted in two findings, one in maintenance and one in paratransit. The paratransit finding focused on trip denials due to a lack of capacity. CAT indicated that an additional \$50,000 has been added to the paratransit budget to address the issue and that they sent a formal response to FTA in September 2009.

Tom Procopio of TranSystems reviewed the schedule for the site visit, including which parts of the operation would be reviewed each day. A copy of the schedule is provided in Attachment B.

Ms. Clark closed the meeting by reviewing the next steps in the process. She noted that once the draft report was transmitted to CAT for review and comment it would be subject to release in

response to Freedom of Information Act (FOIA) requests. The final report would include CAT's comments and would be posted on FTA's website.

Following the conference call, the review team met with CAT staff to discuss the information sent in advance. The review team also reviewed the material made available on site, including information about the structure and operation of the ADA complementary paratransit service, called Links Paratransit. Following the review of the paratransit service, CAT gave the review team a tour of the facility. The morning ended with the review team beginning the process of gathering information about complaints, budget and resources, and trip denials.

During the afternoon of November 2, the review team began a review of the eligibility process, on-time performance, and travel time. Review team members also began observing call center operations (reservations, scheduling and dispatching).

On the morning of November 3, the review team continued observing call center operations. Review team members met with the paratransit coordinator to discuss scheduling procedures and met with the transportation director to request data reports to assist in the review of on-time performance and travel times.

During the afternoon of November 3, the review team began interviewing drivers and staff responsible for reservations, scheduling, and dispatching. The review team observed dispatching operations, the telephone system, and call center staffing.

On the morning of November 4, observations of dispatch and additional driver interviews continued. Workforce, driver training, and driver turnover records were also reviewed at this time. Throughout the day, the review team continued its analysis of on time performance, travel time, and budget and resources.

On the morning of November 5, the review team continued to tabulate the data collected during the site visit and prepared for the exit meeting, scheduled for 2 p.m. at the CAT offices. CAT representatives were:

- Betty Wineland, Executive Director
- Murray Gillerson, Transportation Director
- Sharon Hill, Paratransit Coordinator

Review team members attending were Tom Procopio and Patricia Monahan of TranSystems, and David Chia of Planners Collaborative. Sue Clark from FTA's Office of Civil Rights participated by telephone.

Ms. Clark started the meeting by thanking CAT staff for their cooperation during the week. She reviewed the process by which FTA will develop the draft and final reports. She also indicated that CAT will be given the opportunity to respond to the contents of the draft report before it becomes final.

The review team also thanked CAT staff for their cooperation throughout the visit. The review team presented their initial findings in the following areas:

- Rider comments and complaints
- Service parameters
- Eligibility
- Telephone service and call center staffing

- Reservations
- Scheduling
- Dispatching
- On-time performance
- Travel time
- Driver interviews
- Resources

3 Background

CAT is the largest transit system in Arkansas. The service area includes the cities of Little Rock, North Little Rock, Maumelle, Sherwood, and parts of Pulaski County. The service area is approximately 98 square miles with a population of 168,000 people.

3.1 Description of Fixed Route Service

According to the 2007 National Transit Database (NTD), CAT provided 2,243,758 trips annually. CAT's expenditures, according to the 2007 NTD Fact Sheet, are approximately \$12.3 million. These funds are made up primarily of local dollars. The base fare for fixed route service is \$1.35.

CAT uses a fleet of 57 buses (46 in peak hour service) to operate 20 fixed routes and four express routes. Bus service is available from 5 a.m. until 9:15 p.m. on weekdays, 5:30 a.m. to 7:30 p.m. on Saturday and from 8 a.m. until 5:15 p.m. on Sunday. The River Rail streetcar serves both North Little Rock and Little Rock, including a number of downtown Little Rock locations. The River Rail Green route operates from North Little Rock to the William J. Clinton Presidential Center and Park in Little Rock, serving downtown Little Rock stops along the way. The River Rail Blue route provides service within downtown Little Rock only. Operating hours on the Green route are from 8:20 a.m. to 7 p.m. on weekdays and Saturday. Service on the Blue route begins at 8:20 a.m., Monday through Saturday, ends at 10 p.m. on Monday, Wednesday, and Friday, and ends at midnight on Thursday, Friday, and Saturday. Blue route service also operates from 10:40 a.m. until 5:45 p.m. on Sunday.

One-way, non-discounted cash fares for the CAT fixed route bus and River Rail streetcar services are shown in Table 3.1.

**Table 3.1—One-Way, Non-Discounted CAT Fixed Route
Bus and River Rail Streetcar Fares**

Type of Service	One-Way, Cash Fare
Local Bus	\$1.35
Express Bus	\$1.25
River Rail Streetcar	\$1.00

All CAT buses are accessible, and over 30 low-floor buses are in use, including 10 that were delivered in 2009. Nineteen new low-floor buses were scheduled for delivery in 2010.

3.2 Description of ADA Complementary Paratransit Service (Links Paratransit)

CAT's ADA complementary paratransit service is known as Links Paratransit (Links). The Links office is under the responsibility of the Director of Transportation and is comprised of a paratransit coordinator, two Paratransit Schedulers, and a Paratransit Dispatcher. The responsibility for reservations, scheduling and dispatching process primarily rests with two Paratransit Schedulers. The Paratransit Schedulers also serve as dispatchers, with the paratransit coordinator and Paratransit Dispatcher serving as backup dispatchers.

Following is a summary of key service policies, based on information provided by CAT and included in the Links Paratransit Handbook (Handbook) and other public information in use at the time of the review. Parenthetical page references in this report are to the Handbook (see Attachment C for full Handbook).

Type of Service

The base level of service provided by Links is curb-to-curb, but the CAT website and the Handbook note that assistance to and from the door is available on request as long as the driver is able to keep the vehicle in sight. The Handbook also states several other limitations on assistance beyond the curb:

- Assistance will not be provided beyond the front entrance of the destination
- Drivers will not enter a rider's home other than to assist into or out of the door threshold
- The rider is responsible for locking his/her door when leaving, or obtaining assistance from another person (Page 20)

Based on interviews, Links paratransit drivers appeared to have an inconsistent understanding of the Links policy regarding assistance. This is discussed in more detail in Chapter 5.

Service Area

The Links program is advertised to serve trips with origins and destinations that are within 3/4-mile of each CAT fixed route.

Response Time

The DOT ADA regulation at § 37.131(b) of the regulations states that a transit system “shall schedule and provide paratransit service to any ADA paratransit eligible person at any requested time on a particular day in response to a request made the previous day.” As discussed in more detail in Chapter 8, Links Paratransit service is constrained and most riders call to make trip requests much farther in advance than the day before service; many call 14 days in advance. The need to eliminate this capacity constraint is discussed in more detail in Chapters 8. During the review of the scheduling process, the review team observed trip prioritization for trips that were requested 10 or more days in advance. The need to eliminate the practice of prioritizing trips requested 10 or more days in advance is discussed in Section 9.

Staff answers telephones in the Links Paratransit reservations/dispatch office from 5 a.m. until 7 p.m. on weekdays, and from 8 a.m. until noon on Saturday. Calls are sent to voice mail after noon on Saturday and all day on Sunday. Staffing of reservations and the dispatch center are discussed in Chapter 7.

The Handbook describes Links Paratransit as next-day service and that requests for service on a particular day may be made any time during the preceding day and up to 14 days in advance. However, the Handbook also states that reservations should be made at least 24 hours in advance, and that when possible, Links Paratransit requests a minimum of 2 to 3 days' notice (Handbook, pages 9 to 10). In addition, the Links section of the CAT website encourages riders to call with trip requests as far in advance as possible. Review team observations and analysis reflect that 70 percent of Links riders have learned to call 10-14 days in advance of their trips. This analysis is discussed in Chapter 8.

Days and Hours of Service

CAT's September 28, 2009, letter to the review team indicated that Links service is provided from 5:30 a.m. until 9:15 p.m. on weekdays, from 5:30 a.m. until 7:30 p.m. on Saturday, and from 8 a.m. until 5:15 p.m. on Sunday. The CAT website information on Links Paratransit service hours is not consistent with these hours. Hours for Links service that appear on the CAT website are somewhat different, and show different days and hours of service in Little Rock and North Little Rock. The need to revise the ADA complementary paratransit service hours is discussed in Section 5.

Fares

The one-way Links fare is \$2.70, twice the base fixed route bus fare of \$1.35. The one-way fare for River Rail service is \$1. This lower base fare is not factored into the fares for Links Paratransit service within the area served by the (River Rail) streetcar routes. The need to revise the ADA complementary paratransit fares is discussed in Section 5.

Trip Purpose

Links' stated policy is to serve all trip purposes and not give priority to any types of trips in the reservations or scheduling process. At the time of the review, the review team found that in practice Links engaged in trip prioritization. The need to revise these practices is discussed in Chapters 5 and 8 of this report.

Service Design

CAT operates Links service directly from its administrative, operating, and maintenance facility located at 901 North Maple Street in North Little Rock.

CAT also has an agreement with Greater Little Rock Transportation Services/Yellow Cab (Yellow Cab) to handle trips that cannot be scheduled onto a Links Paratransit vehicle or need to be reassigned. Arrangements between CAT and Yellow Cab are fairly informal. After notifying the rider that a taxi will be providing his or her trip, the Links Paratransit dispatcher places a request with the Yellow Cab dispatcher. Yellow Cab charges CAT meter rates for Links Paratransit trips—a \$3.00 drop charge and \$1.60 per mile. The rider pays the ADA complementary paratransit fare with cash or a Links Paratransit ticket. Cash is credited to a CAT account; tickets and a completed voucher for each trip are attached to a monthly bill from Yellow Cab to CAT. Yellow Cab is responsible for managing vehicles and drivers; CAT handles all communication with riders. Yellow Cab operates one accessible vehicle.

Eligibility Determination

CAT staff handles requests for ADA paratransit service eligibility applications, and sends a copy of the Handbook with each application. The Director of Transportation and the Director of the Arkansas Disability Coalition make eligibility determinations; the Executive Director makes the final decision on each application.

3.3 ADA Complementary Paratransit Performance Policies and Standards

Links Paratransit is operated in-house. CAT employees perform eligibility determinations, take reservations, schedule and dispatch trips, and maintain the vehicles.

The call center, where reservations, scheduling and dispatching occur, is located at CAT headquarters at 901 Maple Street, North Little Rock. CAT operates 20 vehicles with a peak pull-out requirement of 17 vehicles. At the time of the review twelve replacement vehicles had been ordered and were expected by January 2010.

ADA Complementary Paratransit service policies and observations concerning compliance with the service criteria including service area, days and hours of service, fares, response time, and trip purposes are covered in detail in Chapter 5.

Trip Denials

At the time of the review, CAT was denying requests for ADA complementary paratransit trips. An FTA Triennial Review reported that between 1.7 and 2.9 percent of trips requested were denied between January and April 2009. The ADA review team confirmed the Triennial Review and calculated a denial rate of 1.7 percent of trips. CAT has a goal of eliminating trip denials within the next three years, with a maximum allowable number of denials set at 2.0 percent. The need to eliminate denials to bring Links service into compliance with the DOT ADA regulations are discussed in Sections 8 and 9.

Missed Trip and No-Show Policy

According to the Handbook, a driver will not wait past a rider's pickup time. It further states that if a rider does not keep the appointment with the vehicle, and has not called to cancel, he or she is classified as a no-show. A person who accumulates three no-shows in a six-month period will be suspended for 30 days. If a rider has waited 15 minutes past their pickup time, he or she may leave the designated pickup point without being penalized as a no-show (pages 12 to 13).

The no-show policy is described in more detail in Chapter 6.

Trip-Cancellation Policies

According to the Handbook, riders are asked to call and cancel trips at least 24 hours before service is scheduled, if possible. The Handbook also refers to late cancellations as "a short-notice cancellation." A short-notice cancellation is one that occurs with fewer than 4 hours notice. A rider accumulating three of these cancellations in a 6-month period is subject to suspension of service for 30 days (Handbook page 12). No Show and Cancellation policies are discussed in more detail in Section 6.

On-Time Standard

The Handbook states that the on-time standard for Links Paratransit is 10 minutes before or after the actual reservation time. This is explained in the Handbook as, "If a pickup time is 9:15, the rider must be ready by 9:05. The driver will not wait past the designated pickup time." A driver is considered to be on time if he arrives within the +10/-10-minute window. The goal is 100 percent on-time performance.

At the time of the review, CAT had no on-time window for trips with appointment times, and there was no standard for on-time drop-offs. The on-time performance standard is discussed in more detail in Chapter 9.

On-Board Travel Time

According to CAT staff, the travel time standard is set to one hour on board or less. The travel time standard is not included in the Handbook or on the CAT website. A detailed discussion of travel time can be found in Chapter 9.

Telephone Service Standard

Telephones must be answered within 2 minutes of the first ring. Calls are not to be on hold longer than 3 minutes. The need to revise these standards can be found in Chapter 7.

3.4 Rider Input

Formal ADA Complaints Received by FTA

At the time of the on-site review, there was one formal complaint on file at FTA related to CAT's provision of ADA complementary paratransit service. FTA received the complaint on October 23, 2008. The complainant raised a number of service performance issues, including:

- Lack of origin-to-destination service
- Lengthy on-board travel time
- Poor on-time performance
- Excessive advance notice requirements
- Use of taxis to provide service
- Insensitivity toward people with disabilities
- Inconsistent driver performance
- Difficult telephone access

The review team contacted the complainant to discuss these issues in more detail prior to the site visit.

The complainant indicated that a letter was received explaining that effective June 10, 2008, Links Paratransit vehicles would be unable to pick up or drop off riders in areas that would require the vehicle to back up in order to depart from the pickup/drop-off point. The complainant's residence is in an apartment complex where there is not enough room for vehicles to turn around, requiring them to back up a driveway on a hill into a busy street when leaving the complex. The Transportation Director stated that drivers are discouraged from operating vehicles in this manner, and typically sends a street supervisor to assist the driver in backing the vehicle out of such locations. The complainant, who is blind, requested a modification of the new Links Paratransit policy in order to receive origin-to-destination service. The complainant indicated that after lengthy negotiations, Links agreed to a pickup point at the front door, but felt that the agreement was subject to change because Links would not put it in writing. The complainant indicated that rides home from work at 4:30 p.m. can sometimes take 90 minutes. A trip history for this individual for the period of June 6, 2008, through September 9, 2009, obtained from Links Paratransit, was submitted with the formal complaint. The complaint

indicated that the trip history showed 62 trips with travel times between 45 and 90 minutes. The complainant indicated that recently pickup times had been scheduled for 30 to 40 minutes later to avoid long ride times, but the complainant stated this was not acceptable. The complainant indicated experiencing on-time pickups and drop-offs for appointments after work, but the same was not true for trips from work to home. On-time performance for those trips was also a concern. The complainant indicated that on three specific occasions in October and November 2008, the vehicle did not arrive for a 4:30 p.m. pickup until after 5 p.m.

The complainant alleged that Links requires make trip reservations 14 days in advance, and that this also applies to all Links paratransit riders and trips.

The complainant noted in the complaint is that taxis are occasionally sent to pick up the complainant, but that the complainant is not notified in advance. The complainant indicated that due to disability, if a taxi is not expected, the driver must be relied upon to use the vehicle's horn to indicate that the vehicle has arrived.

The final issue included in the formal complaint is that of insensitivity. The complainant alleged experiencing less than appropriate sensitivity from Links Paratransit employees to the needs of people with disabilities and the effect that service policies have on its riders.

In addition to reiterating these concerns during the review team interview, the complainant also indicated that: 1) the telephones in the reservations office are sometimes turned off before 7 p.m.; 2) drivers do not all provide a consistent level of assistance to riders; 3) several drivers do not behave in a professional manner and 4) riders do not know where or how a rider can register complaints about the service.

Rider Interviews

Prior to the on-site visit, the review team attempted to contact several Links Paratransit riders as well as various agencies serving those persons who may be eligible to use ADA paratransit service. A total of 23 agencies were contacted and from these contacts two agency employees, one current paratransit rider, and one former rider who is still eligible for service, were interviewed. More than one agency serving persons with disabilities indicated that very few to none of their clients are Links users and were therefore unable to offer comments. One agency employee said that many clients used to ride Links, but all have since chosen to use a different service. Further, two agency employees reported that some riders declined to be interviewed for "fear of losing what little service they currently have."

Each interviewee was asked for input on various aspects of the Links service, including the eligibility-determination process, telephone hold times, trip denials and getting trips scheduled at desired times, on-time performance, on-board travel times, driver assistance and professionalism, and vehicle condition. Each was also asked for any other input on the service not covered by the specific questions. Summaries of the comments received are provided in the appropriate sections throughout the report.

4 Summary of Findings

This chapter summarizes the findings made as a result of the review. Findings denote deficiencies in ADA compliance or topics on which FTA requires additional reporting to ensure an ADA compliance issue does not exist. Findings shall always require corrective action and/or additional reporting. Recommendations are statements detailing suggested changes to policy or practice to ensure best practices under the ADA. The basis for findings and recommendations are detailed in Chapters 5 through 10.

4.1 ADA Complementary Paratransit Service Criteria

1. The review team noted drivers' inconsistent understanding and application of the stated policy for providing origin-to-destination service. In actual practice, CAT does not appear to comply with Section 37.129(a) of the DOT ADA regulations which states must CAT to provide service on an origin-to-destination basis and to have procedures in place to provide additional assistance beyond the curb.
2. Links Paratransit service hours are not in compliance with the DOT ADA requirements at Section 37.131(e), which requires that service be provided during the same hours and days as the fixed-route system. Service on CAT bus routes 3, 5, 12, 13, 14, 15, 17, 19, and 20 begin earlier than Links Paratransit service on weekdays and/or Sunday. Service on Route 17A ends later than Links Paratransit service on weekdays. In addition, the Blue Line of River Rail operates later than the Links Paratransit service hours on all seven days.
3. The fare for a one-way trip on Links Paratransit is \$2.70. The cash fare on CAT's fixed route buses is \$1.35, while the cash fare for CAT's streetcar service (River Rail) is \$1.00. For ADA complementary paratransit trips with an origin and destination within 3/4-mile of a River Rail station, the Links Paratransit fare exceeds the maximum allowable fare of \$2.00. This is not consistent with the DOT ADA regulations at Section 37.131(c), which states that the paratransit fare be no more than double the non-discounted fixed-route fare for a similar trip.
4. The March 2009 edition of the Handbook indicates that registered riders may not act as a PCA in order to avoid paying a fare. This is not consistent with the DOT ADA regulations at Section 37.131(c)(3). At the time of the review, CAT had not enforced this policy; nevertheless, it may not restrict who serves as a PCA for a registered Links rider.
5. Links Paratransit does not negotiate pickup times in a manner consistent with the DOT ADA regulations on response time. Section 37.131(b)(2) permits Links Paratransit to negotiate pickup times with the individual, however Links cannot not require an ADA paratransit eligible individual to schedule a trip to begin more than one hour before or after the individual's desired departure time. Since Links Paratransit does not save pickup or drop-off times negotiated by the riders and call-takers, any manual changes made during the subsequent scheduling process which push the pickup/drop-off time beyond one hour of the negotiated time is inconsistent with DOT ADA regulations.
6. CAT's stated policy is that there are no trip purpose restrictions for Links paratransit trips. However, Links paratransit schedulers identified one practice in which Links may be treating trip requests differently based on trip purpose and engaging in trip prioritization. When adjusting estimated arrival times, the paratransit schedulers would tend to leave medical and work trips unchanged, while moving the estimated arrival times of trips with other purposes later than the requested appointment time. The schedulers should neither be adjusting any rider's arrival time

to be later than the requested appointment time, nor should they prioritize these adjustments based on the purpose of a trip. These practices are inconsistent with Section 37.131(d) of the DOT ADA regulations.

7. CAT has a process for receiving and investigating complaints concerning Links Paratransit service. It documents the steps taken by CAT managers for most of the complaints that required action. However, CAT had no documentation of its response to riders. It appears that CAT's complaint process does not meet the requirements of 49 C.F.R. §§ 27.13(b) and 27.121(b) of the DOT ADA regulations, which require public transit providers to receive complaints from riders and keep copies of complaints on file for one year and maintain a summary of complaints on file for five years. It does not appear that CAT maintains a summary of complaints on file for five years.

4.2 ADA Complementary Paratransit Eligibility Process

1. At the time of the site visit, the only accessible format in which application materials are available is large print, although Braille and audio tape were listed as options on the Links Certification Form. Section 37.125(b) of the DOT ADA regulations states that all information related to eligibility and the eligibility-determination process must be made available in accessible formats, upon request. While materials do not need to be in the particular format that an individual may prefer, they must be in a format that the individual can use. Large print does not meet the needs of all potential applicants.
2. CAT requires individuals who have been determined to be eligible for Links service to obtain a photo ID card at the CAT office, and incorrectly charges a fare to individuals who use Links for the trip to obtain their ID card. This requirement prevents individuals who have been determined eligible from receiving service due to the lack of an ID card and represents a capacity constraint, delays the effective date of eligibility and violates the prohibition against application fees and special charges found in Section 37.5 of the DOT ADA regulations.
3. CAT must make eligibility determinations based on the individual's functional ability to use fixed-route transit, and not use the applicant's home address as a basis for denying eligibility. Appendix D to Part 37, under Section 37.131, states that an eligible user who lives outside the service area must be picked up if they can find a way to get to a pickup point within the corridor. The DOT ADA regulations require complementary paratransit service be provided between any origin and destination point within the service area.
4. Based on a review of a sample of application files for individuals who had been denied ADA paratransit eligibility between March 2008 and October 2008, letters that CAT used to notify individuals that they are not eligible did not include specific reasons for the decisions as required by Section 37.125(d). The DOT ADA regulations require that eligibility determinations must be in writing, and if applicants are found to be ineligible, the determination must state the specific reasons for the finding. Appendix D further explains that the determination cannot merely state that the person has been found to be able to use fixed route service.
5. The letter that CAT sends to applicants who receive full (unconditional) eligibility does not include the expiration date for eligibility, as required by Section 37.125(d).
6. The letters that CAT sends to applicants who receive temporary eligibility or are denied eligibility do not include information about the appeals process as required by Section 37.125(d). Since temporary eligibility is a condition that limits eligibility, the notification letter must inform individuals of their right to appeal the decision.

7. CAT's committee that hears Links eligibility appeals includes the Director of Transportation and the Executive Director. However, the Director of Transportation is also one of the two individuals who makes initial eligibility determinations. Furthermore, he reports to the Executive Director. This arrangement is inconsistent with Section 37.125(g) of the DOT ADA Regulations and Appendix D. The eligibility process must include appropriate separation of functions, which means the same person must not decide the case on appeal. Additionally, the individuals who hear the appeal should not be a supervisor or subordinate of an individual who made the initial decision.
8. CAT's written no-show policy imposes suspensions of service on riders who fail to appear for a scheduled trip three times in a period of 6 months. This threshold for a potential service suspension unreasonably limits service to ADA eligible riders. Appendix D to the DOT ADA regulations at Section 37.125 states that suspension of service for no-shows are intended to prevent "a pattern or practice of 'no-shows'" and further notes, "a pattern or practice involves intentional, repeated or regular actions, not isolated, accidental or singular incidents."
9. CAT's appeal policy for suspensions of service requiring rider's to submit an appeal in writing within 10 days of the date of the suspension notice imposes an unreasonable administrative burden inconsistent with the requirements outlined in Appendix D to Section 37.125. The DOT ADA regulations require that the appeal process used for eligibility appeals shall be available for appealing no shows for suspensions of service. Riders must be allowed to challenge charges of a no-show or short-notice cancellation over-the-phone and in-person, rather than requiring a written submission.

4.3 Telephone Access

1. Riders may make trip reservations during any hour when Links Paratransit staff is in the office. After 1 p.m. on Saturday and all day Sunday, Links Paratransit does not accept reservations. Also, on six holidays, the Links office is closed, and thus does not accept reservations for next-day trips. These policies and procedures are inconsistent with §37.131(b)(1).

4.4 Trip Reservations and Scheduling

1. CAT has a goal of a maximum of 2 percent denials on a monthly basis. It plans to eliminate denials within 3 years. These goals are not in compliance with the DOT ADA regulations concerning trip denials. The DOT ADA regulations at Section 37.131(f)(3)(i)(B) prohibit CAT from limiting the availability of paratransit service by a pattern or practice that significantly limits the availability of service to eligible individuals, including substantial numbers of trip denials. CAT must not plan for any level of denials other than zero.
2. CAT does not provide its riders with the ability to request trips on Saturday afternoon for Sunday; on Sunday for Monday trips; or on holidays for trips on the day after the holiday. The DOT ADA regulations at 49 C.F.R. § 131(b) requires that CAT provide paratransit service to eligible individuals in response to a request made the previous day.
3. When scheduling trip requests, Links staff explicitly prioritizes requests by how far in advance a rider makes the request. Links makes efforts to schedule and serve all trip requests made 10 to 14 days in advance, and it cannot guarantee all trips made that far in advance. These customers are guaranteed a ride, either by Links vehicle or by taxi. Trip requests made 9 or fewer days in advance, including all trips for next day service, are not guaranteed a ride. This practice violates DOT ADA regulations at Section 37.131(b) which requires an entity to schedule and provide a

trip in response to a request made the previous day.

4.5 Service Performance

1. At the time of the review, CAT did not negotiate pickup or drop-off times to ensure that offered pickup times did not require a Links customer to begin a trip more than an hour before or after the desired departure time or get to appointments late (when appointment times were known). On the day before service, riders receive a call with their pickup times. If they want a different time, they must call dispatch on the morning of service. The adjustment of requested pickup and/or drop-off times by Links schedulers outside of the pickup window without the rider's knowledge or consent does not constitute a negotiation consistent with FTA technical assistance and the DOT ADA regulations at Section 37.131(b)(2).
2. At the time of the review, Links schedulers actively prioritized and attempted to schedule only those trips requested 10 days or more in advance, and it could not guarantee all trips scheduled that far in advance of service. Such trip requests not scheduled by the day before service are placed on the Wait List and scheduled during the day of service—if necessary, to taxi contractor. In contrast, any trips requested less than 10 days in advance and not scheduled by the day before service—including all requests for next day service—are denied. These failures to schedule and provide next day service and patterns or practices of trip denials violate Sections 37.131(b) and 37.131(f)(3)(A) of the DOT ADA regulations.
3. Links staff stated that instances of a scheduled pickup time being more than 60 minutes from the requested time occur “very infrequently.” CAT was not aware that these constitute trip denials and not consistent with the DOT regulations at Section 37.131(b)(2). When this happens, CAT asks the rider to call dispatch on the day of service to try to make an adjustment.

4.6 Resources

1. There are no findings non-compliance requiring corrective action in Chapter 10 of the report

5 ADA Complementary Paratransit Service Criteria

5.1 Rider Comments

The review team interviewed riders and agency representatives in advance of the on-site review. All four interviewees mentioned the trip-scheduling process. Three respondents said that there were no problems with getting rides scheduled at appropriate times or with trip denials. One user explained that trip scheduling was “fine,” but only because she knew to call 14 or more days in advance. The rider reported that trips not scheduled 14 or more days in advance were usually denied, due to lack of capacity. One rider opined that Links paratransit fares were higher than fixed route fares. One rider said that she had filed one complaint had received a timely response and changes were made as a result. An agency employee said that Links was both timely and responsive when it came to complaints.

5.2 Type of Service

Section 37.129(a) of the DOT ADA regulations indicates that ADA complementary paratransit service must be provided on an origin-to-destination basis. Transit agencies may designate the basic level of service that they provide as either curb-to-curb or door-to-door. If the base service is curb-to-curb, transit agencies must have procedures in place to provide additional assistance beyond the curb if this is needed for eligible riders to complete their trips. This might include assisting riders to and from the front door and policies and procedures for providing this assistance in a safe and reasonable way.

The Handbook (revised March 2009) states:

Links vehicles do not enter private driveways. Riders must be waiting at the sidewalk, or at another safe waiting area in front of, or as close as possible to, the entrance of the pickup location.

Upon request, the driver may provide assistance between the vehicle and the door; as long as the operator is able keep the vehicle in sight.

Time constraints limit the driver’s ability to assist you beyond the front entrance of your destination. If your destination is a large building or expansive complex, it might be best to have a companion, or personal care attendant, accompany you to provide assistance after you arrive.

For drop-offs, the operator will drop the rider off at the sidewalk, or another safe waiting area next to the curb or a public street in front of, or as close as possible to, the designated drop-off location. [Pages 19-20]

Review team members found some inconsistencies in driver training as well as in driver interviews and observations of Links dispatchers. One driver indicated in an interview with the review team that during training, drivers are told, “Do not push, pull, or carry” when offering assistance to passengers—in large part, to avoid injuries. Other drivers said that they exercise judgment when assisting riders between building entrances and the vehicle.

Some drivers reported that they offer assistance to Links Paratransit passengers, as long as their schedule permits and they do not lose sight of vehicle. Also, dispatchers stated that they authorized additional assistance to passengers when drivers ask.

Drivers and riders may have varying expectations with regard to the level of passenger assistance, based on variations among the written policies and that in actual practice different dispatchers and drivers authorize and provide different levels and types of assistance.

Some of these policies may be adequate for knowing if assistance is needed from the vehicle to the door of the destination but they are not sufficient for determining if riders need assistance from the door of their origin to the vehicle. Information about the need for assistance at the origin is typically captured in the reservations process.

5.3 Service Area

DOT ADA regulations require a transit provider operating fixed route bus service to provide complementary paratransit service that covers, at a minimum, all origins and destinations within 3/4-mile of all of its bus routes, along with any small areas within its core service area that may be more than 3/4-mile from a bus route, but that are otherwise completely surrounded by served corridors (Section 37.131(a)(1) and Appendix D). In addition, entities operating a rail system must provide complementary paratransit service from points within a 3/4-mile radius of any rail station to points within a 3/4-mile radius of any other rail station.

The regulations also require that the ADA complementary paratransit service be available during the same hours and days as the agency's fixed route service (Section 37.131(e)). For example, an agency that has fixed route bus service on weekdays but not weekends must have ADA complementary paratransit service on weekdays but is not required to provide service 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. and 9 p.m. This requirement can be applied on a route-by-route basis. For example, if a particular bus route ends service at 9 p.m., ADA complementary paratransit service could be available in that service corridor only until 9 p.m.

CAT's policy is that Links Paratransit operates strictly within 3/4-mile of fixed route buses and River Rail streetcar service. At the time of the review team's site visit, all portions of the core service area were within 3/4-mile of a CAT bus route, so there were no small areas not receiving Links service that were surrounded by other areas that did receive Links service.

To determine whether an address is within 3/4-mile of CAT's fixed routes, a Links scheduler/dispatcher can use the StrataGen paratransit software to view a map with the outlines of the 3/4-mile boundaries for Links service. The scheduler/dispatcher then uses Google Maps to locate the street address in question. The scheduler/dispatcher compares the two maps to determine if an address is within the Links Paratransit service area.

A Links Paratransit scheduler/dispatcher demonstrated the process with a sample address that was close to, but outside of, the service area.

To double-check the accuracy of the software, CAT may send a road supervisor to verify location of address.

5.4 Days and Hours of Service

According to information provided by CAT to the review team prior to the site visit, Links Paratransit service is provided weekdays from 5:30 a.m. to 9:15 p.m., Saturdays from 5:30 a.m. to 7:30 p.m. and Sundays from 8 a.m. to 5:15 p.m. However, as shown in Table 5.2, service on bus routes 3, 5, 12, 13, 14, 15, 17, 19, and 20 begins earlier than Links Paratransit service on

weekdays and/or Sunday. The service on route 17A ends later than Links Paratransit service on weekdays.

In addition, the Blue Line of the River Rail streetcar operates later than Links Paratransit service hours on all seven days, running until 10 p.m. Mondays through Wednesdays, until midnight Thursdays through Saturdays, and until 5:45 p.m. on Sundays.

The Links service area is the same for all days and all hours of operation. CAT could choose to comply with the requirement for comparable service hours by serving only those areas within 3/4-mile of the bus routes and River Rail streetcar that operating the extended days and hours.

Table 5.2–CAT Fixed Routes with Service Hours Beyond Links Paratransit Service Hours

		Weekday Start	Weekday End	Saturday Start
Links Paratransit		5:30 a.m.	9:15 p.m.	5:30 a.m.
Bus Route				
3	To downtown	5:22 a.m.		5:22 a.m.
5	To downtown	5:25 a.m.		5:25 a.m.
12	From downtown	5:22 a.m.		5:24 a.m.
13	To downtown	5:28 a.m.		5:28 p.m.
14	From downtown	5:10 a.m.		5:14 a.m.
14	To downtown	5:22 a.m.		5:25 a.m.
15	From downtown	5:22 a.m.		5:22 a.m.
17	To downtown	5:03 a.m.		
17	From downtown	5:16 a.m.		
17A	To UA Little Rock		9:16 p.m.	
19	To downtown	5:20 a.m.		
20	From downtown	5:20 a.m.		
River Rail				
Route				
Blue	Mon-Wed-Fri		10:00 pm	
Blue	Thu-Fri-Sat		Midnight	

5.5 Fares

The DOT ADA regulations allow a fare for each ADA complementary paratransit service trip to be up to twice that charged for the base fare on fixed route service for the same origin and destination at the same day and time (Section 37.131(c)).

Based on CAT's fixed route fare structure at the time of the on-site visit, the cash fare on CAT's fixed route buses is \$1.35. The cash fare for CAT's streetcar service (River Rail) is \$1.00. The fare for a one-way trip on Links Paratransit is \$2.70 (there are some discounts for multi-ticket purchases). Companions pay the same fare as the eligible rider. PCAs do not pay a fare on Links Paratransit. Although not enforced, the Handbook indicates that registered riders may not act as a PCA in order to avoid paying a fare. This is expected to be removed from the next version of the Handbook.

The DOT ADA regulations at Section 37.131(c), require that for ADA complementary paratransit trips with an origin and destination within 3/4-mile of a River Rail station, under

CAT's current fixed route fare structure, the Links fare may be no greater than twice the River Rail fare:\$2.00.

For ADA complementary paratransit trips with an origin and/or destination beyond 3/4-mile of a River Rail station and within 3/4-mile of the bus routes, the Links Paratransit fare of \$2.70 is precisely twice the bus fare.

5.6 Response Time

The DOT ADA regulations at Section 37.131(b) require that CAT accept trip requests made the day before the trip. Requests must be accepted during normal business hours, including on days that CAT is not providing service (e.g., trip requests taken on Sunday for a trip on the following Monday). Section 37.131(b) allows CAT to negotiate pickup times up to one hour before or after the pickup time requested by riders.

At the time of the site visit, a small percentage of trips were scheduled while the rider is on the telephone and these were trips scheduled 10-14 days in advance. The vast majority of trips and any trip request made 9 or fewer days in advance are saved as unscheduled. Trips that are not scheduled while the rider is on the telephone are saved as unscheduled to either Will Call or Wait List. These lists are described in more detail in Chapter 8. Trips on these lists are scheduled the day before service. Between 4 p.m. and 7 p.m. on the day before the trip, the rider is called back with a pickup time. The Dispatcher on duty is responsible for making the calls. He indicated that when a rider objects to a pickup time, he or she is advised to call back in the morning to try and negotiate a new pickup time with the morning dispatcher. Handling the trip requests in this manner is not a true negotiation of times within the meaning of the DOT ADA regulations. Chapter 8 describes in more detail: trip scheduling, the need to serve all trips, and the fact that the Will Call or Wait lists constitute capacity constraints—which violate Section 37.131(f)(2) of the DOT ADA regulations.

Telephones are answered during all hours when Links office has staff (weekdays from 4:30 a.m. to 7 p.m. and Saturdays from 4:30 a.m. to 1 p.m.). Normal CAT business hours are Monday through Friday 8 a.m. until 5 p.m.

Riders may make trip reservations during any of these hours. After 1 p.m. on Saturday and all day Sunday, Links does not accept reservations. During other Links Paratransit service hours, a caller hears a recording that refers the caller to CAT's fixed route dispatcher.

CAT does not operate on six holidays (New Year's Day, Memorial Day, July 4, Labor Day, Thanksgiving, and Christmas). On these days, the Links Paratransit office is also closed.

5.7 Trip Purpose

Section 37.131(d) of the DOT ADA regulation requires that there are no restrictions or priorities based on trip purpose in the provision of ADA complementary paratransit service.

According to the Handbook, "There are no restrictions on trip purpose. All requests for trips are accepted on a first-come, first-served basis. According to the ADA, no trips can be given priority. Medical trips, work trips, and recreational trips are handled on an equal basis" (page 9).

During discussions between review team members and Links schedulers, the schedulers identified one practice in which Links may treat trip requests differently based on trip purpose and engage in trip prioritization. When adjusting estimated arrival times, the paratransit

schedulers would tend to leave medical and work trips unchanged, while moving the estimated arrival times of trips with other purposes later than the requested appointment time. The schedulers should neither be adjusting any rider's arrival time to be later than the requested appointment time, nor should they prioritize these adjustments based on the purpose of a trip. These practices are inconsistent with Section 37.131(d) of the DOT ADA regulations.

5.8 Coordination with Adjoining Service Providers

The DOT ADA regulations require transit agencies to coordinate with agencies with overlapping or contiguous service areas for paratransit riders who want to travel between service areas (49 CFR 37.139(g)). CAT does not have any fixed route systems that have overlapping or adjoining service areas.

5.9 CAT Complaint-Handling Process

The DOT ADA regulations require public transit providers to receive complaints from riders and keep copies of complaints on file for one year and maintain a summary of complaints on file for five years (49 CFR 27.13(b) and 27.121(b)). While requirements to respond to complainants are not included in the DOT ADA regulations, it is a common and effective practice for a transit provider to respond to complainants and for transit providers to investigate allegations to ensure that all DOT ADA requirements are being met.

The Handbook provides a mailing address (901 Maple, North Little Rock, 72114) and telephone number (375-9607) for riders to contact with comments and suggestions. Customers and advocates may also e-mail comments and complaints to CAT at info@cat.org. The website has a link called Contact Us. This link opens a form where the customer or advocate enters their name, e-mail address, and their comment or complaint. When finished entering the comment or complaint, there is a button to send the form to CAT at the e-mail address. Based on the complaints analyzed by the review team, most communication from riders and advocates appears to be via telephone or e-mail.

For comments and complaints received by telephone, Links Paratransit and other CAT staff use a Customer Service Report form. They fill in the form by hand, recording the rider's name, contact information, and a description of the incident. CAT does not record rider comments in electronic form.

If the complaint is related to an accident, safety, or driving, the CAT Safety and Training Coordinator reviews the complaint and talks to the driver involved in the incident. Other issues will likely lead to the Director of Transportation speaking with the driver or the paratransit coordinator speaking with other Links staff.

If CAT managers believe there is a need for disciplinary action, the CAT Human Resources Manager gets involved.

According to the Director of Transportation, he tries to resolve the complaint as soon as possible—if possible, the same day after the end of the driver's shift. If the rider provides a telephone number or e-mail address, Links Paratransit replies with the nature of resolution of the complaint.

Rider Comments on File at CAT

During 2008 and 2009, Links had a total of 25 rider comments (including two compliments) on file. The most common means of receiving complaints during this period was by telephone (10), followed by e-mail (7), letter (4), in person (2), and traffic ticket and “unknown” (1 each).

Table 3.2 presents a distribution of these comments by category (please note that the categories were devised by the review team, not CAT).

Table 3.2 – Links Paratransit Rider Comments during 2008 and 2009

Comment Topic	Number
Long trips	5
Safety	5
Driver bad/rude/improper behavior	3
Driver bad service	3
Request for special service	3
Driver assistance requests	2
Driver improper procedures	1
Scheduling	1
Compliment	2
Total	25

The CAT files had thorough documentation of steps taken by CAT managers for most of the complaints that required action. However, CAT had no documentation of its response to riders.

5.10 Findings

1. The review team noted drivers’ inconsistent understanding and application of the stated policy for providing origin-to-destination service. In actual practice, CAT does not appear to comply with Section 37.129(a) of the DOT ADA regulations which states must CAT to provide service on an origin-to-destination basis and to have procedures in place to provide additional assistance beyond the curb.
2. Links Paratransit service hours are not in compliance with the DOT ADA requirements at Section 37.131(e), which requires that service be provided during the same hours and days as the fixed-route system. Service on CAT bus routes 3, 5, 12, 13, 14, 15, 17, 19, and 20 begin earlier than Links Paratransit service on weekdays and/or Sunday. Service on Route 17A ends later than Links Paratransit service on weekdays. In addition, the Blue Line of River Rail operates later than the Links Paratransit service hours on all seven days.
3. The fare for a one-way trip on Links Paratransit is \$2.70. The cash fare on CAT’s fixed route buses is \$1.35, while the cash fare for CAT’s streetcar service (River Rail) is \$1.00. For ADA complementary paratransit trips with an origin and destination within 3/4-mile of a River Rail station, the Links Paratransit fare exceeds the maximum allowable fare of \$2.00. This is not consistent with the DOT ADA regulations at Section 37.131(c), which states that the paratransit fare be no more than double the non-discounted fixed-route fare for a similar trip.
4. The March 2009 edition of the Handbook indicates that registered riders may not act as a PCA in order to avoid paying a fare. This is not consistent with the DOT ADA regulations at Section 37.131(c)(3). At the time of the review, CAT had not enforced this policy; nevertheless, it may not restrict who serves as a PCA for a registered Links rider

5. Links Paratransit does not negotiate pickup times in a manner consistent with the DOT ADA regulations on response time. Section 37.131(b)(2) permits Links Paratransit to negotiate pickup times with the individual, however Links cannot not require an ADA paratransit eligible individual to schedule a trip to begin more than one hour before or after the individual's desired departure time. Since Links Paratransit does not save pickup or drop-off times negotiated by the riders and call-takers, any manual changes made during the subsequent scheduling process which push the pickup/drop-off time beyond one hour of the negotiated time is inconsistent with DOT ADA regulations.
6. CAT's stated policy is that there are no trip purpose restrictions for Links paratransit trips. However, Links paratransit schedulers identified one practice in which Links may be treating trip requests differently based on trip purpose and engaging in trip prioritization. When adjusting estimated arrival times, the paratransit schedulers would tend to leave medical and work trips unchanged, while moving the estimated arrival times of trips with other purposes later than the requested appointment time. The schedulers should neither be adjusting any rider's arrival time to be later than the requested appointment time, nor should they prioritize these adjustments based on the purpose of a trip. These practices are inconsistent with Section 37.131(d) of the DOT ADA regulations.
7. CAT has a process for receiving and investigating complaints concerning Links Paratransit service. It documents the steps taken by CAT managers for most of the complaints that required action. However, CAT had no documentation of its response to riders. It appears that CAT's complaint process does not meet the requirements of 49 C.F.R. §§ 27.13(b) and 27.121(b) of the DOT ADA regulations, which require public transit providers to receive complaints from riders and keep copies of complaints on file for one year and maintain a summary of complaints on file for five years. It does not appear that CAT maintains a summary of complaints on file for five years.

5.11 Recommendations

1. CAT should develop procedures for requesting and recording information about whether riders need assistance beyond the curb. These procedures should be adequate to determine if assistance is needed at either end of the trip. Procedures in use at the time of the site visit, which depend on riders making their needs known to drivers on the day of service, may address the need for assistance from the vehicle to the door of the destination. However, they are not sufficient for determining if assistance is needed from the door of the origin to the vehicle. This is typically captured in the reservations process.
2. CAT should adjust the Links Paratransit service days and hours so that they meet the days and hours of its fixed route buses and River Rail streetcar.
3. For Links Paratransit trips with an origin and destination within a 3/4-mile radius of two different River Rail streetcar stations, the fare should be no greater than \$2.00.
4. The current requirement that registered riders may not act at PCAs should be removed from the next version of the Handbook.
5. Links Paratransit schedulers must not give preference (or appear to give preference) to medical or work trips over other trips in any aspect of their handling.

6. CAT should consider documenting its responses to riders concerning Links Paratransit complaints. When speaking or corresponding to the riders, CAT could ask if they wish to receive a response to their complaint.

6 ADA Complementary Paratransit Eligibility

The review team examined the process CAT uses to determine applicants' eligibility for ADA complementary paratransit service to ensure that determinations are being made in accordance with the regulatory criteria and in a way that accurately reflects the functional ability of applicants. The review team also assessed the timeliness of the application processing. Review team members:

- Obtained input about the eligibility-determination process through interviews with riders and advocates and a review of rider comments on file
- Developed an understanding of the handling and review of applications through an assessment of current eligibility materials and interviews of eligibility-determination staff
- Reviewed eligibility-determination outcomes between November 2008 and October 2009
- Reviewed the application files of applicants who were denied ADA paratransit eligibility between March 2008 and October 2009

6.1 Rider Comments

Each of the individuals contacted in advance of the on-site review were asked about the process used by Links Paratransit to determine ADA paratransit eligibility and whether that process was fair and accurate. All four indicated that the process was fair and accurate. One respondent said that though the determination was fair, the eligibility process itself was inconvenient as it was difficult to find a ride to CAT to pick up the paratransit ID card. Another interviewee indicated that some of the questions on the application need to be answered by a physician, but that the physicians do not want to deal with the paratransit application.

In addition, riders and agency staff were asked whether determinations of eligibility were made in a timely way (i.e., within 21 days from the submittal of the completed application). Three respondents indicated that this was the case, and one respondent did not recall.

6.2 Overview of the Eligibility-Determination Process and Materials

Initial Determination Process

Links Paratransit uses a paper ADA eligibility application form. Individuals may obtain an application form by calling Links Paratransit; a copy will be mailed or faxed along with a copy of the Handbook. All applications are in large-print format. At the time the site visit, t, no r accessible formats were available, even though the paratransit certification form states that Audio tape Braille and Large Print are available. At one time, CAT had the ability to produce application forms in Braille, but the system used to produce Braille versions of the form is not presently operable. The Handbook includes information about the eligibility determination process, including an explanation of presumptive eligibility if the eligibility determination has not been made within 21 days of the receipt of a completed application, and a description of the appeal process. The Handbook also states that eligible individuals must live within 3/4-mile on either side of a CAT fixed route (page 3). The Director of Transportation indicated that he understands that an individual does not need to live within 3/4-mile of a bus route to be eligible,

but as recently as October 1, 2009, an applicant's address was still being used to determine eligibility.

The application consists of two parts. Part I of the application form is for the applicant to complete with contact information and several questions about preferred format for information, use of a Personal Care Attendant (PCA) when traveling, availability of a ramp at the individual's residence, if needed, ability to travel through crowded and/or complex facilities safely and effectively, and acknowledgement of the Links Paratransit policies and procedures.

Part II of the application form is to be completed by a health care provider, defined as a physician, licensed health care professional, licensed rehab social worker, or social service agency representative. Part II includes a more detailed set of questions about the individual's medical condition and ability to walk, stand, communicate, and navigate. A copy of the Links ADA Paratransit Certification Form is provided in Attachment D.

Applications are date-stamped and entered into a log by the CAT receptionist as they are received. The receptionist checks applications for completeness and contacts the applicant or health care professional if additional information is needed. When an application is completed, it is forwarded to the Paratransit Coordinator, who checks to make sure that the applicant's residence is within the Links service area and for completeness. At the time of the site visit, approximately 35 to 40 applications are received each month.

When interviewed, the Director of Transportation understood that while an individual's trip origin and destination must be within the ADA service area, the individual's residence may be outside of the service area. The Handbook and letters denying ADA eligibility both incorrectly state that eligible individuals must reside within the ADA service area.

The Director of Transportation and the Director of the Arkansas Disability Coalition review applications in advance, and meet to discuss determinations about every two weeks. The Executive Director, however, makes final eligibility decisions.

The Director of Transportation indicated that CAT has made efforts to find a health care organization to conduct eligibility determinations, and is considering the use of in-person interviews for individuals that both the Director of Transportation and the Executive Director believe would be ineligible.

The Director of Transportation generates letters to applicants, which are reviewed by the Executive Director. Eligible individuals are required to obtain a photo ID card at the CAT office. There is no charge for the ID card and transportation to the office is provided, but the ride is not free of charge. Appendix D to Section 37.125 of the DOT ADA regulations states that the "ADA paratransit eligibility process may not impose unreasonable administrative burdens on applicants, and, since it is part of the entity's nondiscrimination obligations may not involve "user fees" or application fees to the applicant. Charging the applicant a fare for the required trip to the CAT office as part of the eligibility process constitutes an application fee and is not allowed.

In addition, the letter that grants eligibility states that trip requests (other than to and from the Links Paratransit office to obtain the ID) will not be accepted until the rider has his/her photo ID, which must be obtained within 30 days. This requirement means that even if a person is determined eligible within 21 days they may not be able to arrange to get their photo ID until after 21 days have elapsed. When this happens, those customers must be given presumptive

eligibility. The effect of this policy is to delay the effective date of eligibility, which is inconsistent with the DOT ADA regulations.

Types of Eligibility Granted

CAT grants several types of ADA paratransit eligibility. These include:

Unconditional ADA Eligibility—CAT grants full, or unconditional, eligibility to all applicants who are unable to use fixed route service for some or all of their trips. Full eligibility is valid for three years. However, as discussed below, the letters that grant eligibility reference eligibility on a trip-by-trip basis.

Temporary ADA Eligibility—If either the applicant or the physician indicates that the applicant’s disability is temporary, CAT grants ADA eligibility for the expected duration of the disability.

Visitor ADA Eligibility—The Director of Transportation explained that CAT grants ADA eligibility to visitors to its service area for the period of eligibility that 49 CFR 37.127(e) requires (21 days during a 365-day period). Visitors typically call CAT in advance, and fax a copy of their ID cards from another ADA paratransit system. To date, no visitors without ID cards from another system have expressed a desire to use the Links Paratransit service. Should this occur, CAT would call the other system for information about the individual’s eligibility. According to the Handbook, if a visitor does not have an ID card or documentation of eligibility from their local transit authority the visitor is required to provide documentation of their place of residence and the nature of their disability, if the disability is not apparent.

At the time of the review, eligibility was denied if an individual lived outside of the Links Paratransit service area. Section 37.131 of Appendix D to the DOT ADA regulations explains that a rider does not need to live within the ADA paratransit service area in order to be eligible to receive service. Eligibility is based on an individual’s functional ability to use fixed route service. If an individual lives outside of a corridor and can get to a pickup point within the corridor, the service must pick him up there. The same holds true at the destination end of the trip.

The Handbook also describes two types of Links paratransit eligibility that are not related to ADA: individuals who are certified as a person with a disability by one of several organizations, present a Medicare card, or are over age 65; and ADA-eligible individuals who are making trips outside of the ADA service area. However, CAT staff explained that when the Links ADA paratransit service was first implemented, non-ADA trips were provided if vehicle space was available. At the time of the on site review, CAT did not provide these services.

Recertification Process

At the time of the site visit, the recertification process had been recently revised. Individuals whose eligibility is about to expire are sent a letter and an application form to complete, and they are asked to visit the Links Paratransit office for a new photo ID card.

Eligibility Determination Letters

The review team examined samples of all types of eligibility-determination letters used by CAT (full (unconditional) eligibility, temporary and denials). The letters were reviewed to determine whether they contain the information required by the DOT ADA regulations (49 CFR 37.125(d))

and (e)). The regulations require that documentation of eligibility contain the following five points of information:

1. Name of the eligible individual
2. Name of the transit provider
3. Telephone number of the entity's paratransit coordinator
4. Expiration date for eligibility
5. Any conditions or limitations on the individual's eligibility, including the use of a personal care attendant (PCA)

The DOT ADA regulations also state that determinations of eligibility must be in writing and if applicants are found to be ineligible, the determination must state the specific reasons for the determination (49 CFR 37.125(d)). Appendix D to the regulations indicates that these reasons cannot be a simple recital that the person has been found to be able to use fixed route service. Determinations that deny or limit eligibility should also be accompanied by information about the process for appealing the decision.

Table 6.1 summarizes how the sample determination letters and the ADA Paratransit ID card comply with the requirements of the regulations.

**Table 6.1–Eligibility-Determination Letters and ADA ID Card:
Inclusion of Required Elements**

Information Included	Eligibility Letters		Denial Letter	ADA ID Card
	Unconditional	Temporary		
Rider's Name	Yes	Yes	Yes	No
Transit System Name	Yes	Yes	Yes	Yes
Paratransit Coordinator's Phone Number	Yes	Yes	Yes	Yes
Eligibility Expiration Date	No	Yes	N/A	Yes
Any Conditions or Limitations on Eligibility	N/A	Yes	N/A	No
Information about Appeal Process	N/A	No	No	N/A

The sample letters contained most but not all of the required items. The eligibility expiration date is not noted in the unconditional eligibility letter, but is printed on the required photo ID card. The letter informing an applicant that eligibility has been denied or that temporary eligibility has been granted does not include a description of the appeal process as required by Section 37.125(d), and only states that an appeal may be made to the Executive Director and provides contact information. Since temporary eligibility is a limitation on eligibility, the notification letter should inform individuals of their right to appeal the decision.

The full eligibility letter contains some potentially confusing language in its definition of eligibility. The letter indicates that eligibility is on a trip-by-trip basis, even though CAT does not restrict an individual's eligibility to certain trips. The letter then lists the categories of eligibility (inability to board, ride, or disembark from an accessible bus and the inability to get to a bus stop and wait for a bus) and the need for the trip to be completely within the ADA service area as conditions. Information that would enable CAT to make determinations about the eligibility of an individual for some trips and not others is not collected or evaluated during the eligibility-determination process. Unless conditional eligibility is to be applied, the information in the current letter is not necessary.

Letters that deny eligibility do not specifically relate the evidence in the matter to the eligibility criteria and CAT's eligibility process or provide a detailed explanation of the reasons for the decision. Based on a review of letters denying eligibility transmitted between March 2008 and October 2009, reasons for the denial of eligibility include: the applicant is not prevented from riding fixed routes buses, does not meet ADA paratransit eligibility requirements, or lives outside of the Links ADA service area. The first and second explanations are not detailed enough descriptions of the reasons for the denial of eligibility, and the third explanation is not a valid reason for denying eligibility, as explained above.

6.3 Reported Determination Outcomes

Table 6.2 summarizes eligibility determinations made between November 2008 and October 2009. As shown, CAT received 447 applications. Of those, 377 applicants (84 percent) were granted full eligibility and 62 (13.9 percent) were denied. Temporary eligibility was granted to one individual.

Table 6.2—Eligibility Determinations by Category, November 2008–October 2009

Determination Outcomes	Number of Determinations	Percent of Determinations
Unconditional eligibility	377	84.3%
Temporary eligibility	1	0.2%
Visitor eligibility	7	1.6%
Not eligible	62	13.9%
Total	447	100%

6.4 Process Observation and Reviews of Recent Determinations

Review team members reviewed applications from 109 individuals who were denied ADA paratransit eligibility by CAT between March 2008 and October 2009. Of those applications, 38 (35 percent) were denied eligibility because the individual lived outside of the Links Paratransit service area. This is not an acceptable reason for denying eligibility. As noted earlier, eligibility for ADA paratransit service is a function of the individual's ability to use fixed route service, not the location of his or her residence. The correct response to an application from an individual living outside of the Links Paratransit service corridor would be to evaluate the applicant's ability to use the fixed route system independently, and grant eligibility if it were determined that the individual could not use fixed route service. The individual would then be

able to use Links service for trips with origins and destinations within the Links service area. If the individual can get to a pickup point within the corridor, the service must pick him up there. The same holds true at the destination end of the trip.

Of the remaining applications, review team members selected a sample of 35 for a detailed review. For eight of these 35 applications, the determinations of ineligibility (23 percent) appeared to be appropriate. The information submitted by the applicants and/or their health care professionals indicated that the individuals do have the functional ability to travel independently on the CAT fixed route system. As a result, these applicants did not meet the criteria for ADA complementary paratransit eligibility.

In 19 of the sample of 35 applications (54 percent), it appears that more information would be needed to ensure that the denial of eligibility was the correct decision. In these cases, the health care professional did not explain why the individual's condition would prevent him/her from using the fixed route bus system. On some applications, the information provided by the health care professional was a very technical medical diagnosis without a reference to the abilities needed in order to use the bus system. In others in which the applicant's condition was vision impairment or psychiatric disorder, the health care professional did not clearly explain the individual's abilities. In other applications, the health care professional provided conflicting answers to various questions about the applicant's abilities.

In these cases, a conversation with the health care professional could have clarified how the person's disabling condition affects his/her functional ability to use fixed route bus service. . At a minimum, a conversation with the health care professional might have provided additional useful information. The opportunity afforded by an in-person interview or assessment to observe the applicants' functional ability and level of effort needed to perform the tasks and skills associated with using fixed route service would likely have made these eligibility determinations more accurate.

In the remaining eight of the sample of 35 applications (23 percent), the information submitted by the applicant and the health care professional appeared to indicate that the individual would be unable to use the bus system for any trips and that unconditional eligibility would have been the appropriate decision. In one example, the applicant had diabetes and was missing part of his foot, used a walker, was unable to walk 200 feet, could not climb stairs, and could not stand for 15 minutes without assistance. Six other applications contained similar information about the applicant's ability to travel and wait at a bus stop. One individual's condition included diabetes, asthma, and chronic obstructive pulmonary disease, making her unable to travel 200 feet, climb steps, or stand and wait for 15 minutes without assistance. The application indicated that these abilities were decreased by cold and heat and that the individual used a cane and needed a portable oxygen supply. Another individual's application indicated that he had arthritis and congestive heart failure, making him unable to walk ¼ mile or up or down hills. A third individual's application indicated that she used a walker, had diabetes, vascular disease, coronary artery disease, a toe amputation, and low vision, making her unable to walk 200 feet, climb steps, stand 15 minutes without assistance, or travel over rough surfaces..

The final example of an individual whose application appeared to indicate that he would be unable to use a bus is a person who had had a craniotomy and was able to perform all functions necessary to use a bus but needed to be protected from extreme weather, which could trigger a seizure. Conditional eligibility may have been suitable for this individual, but since CAT does

not grant that type of eligibility, approval of full eligibility may have been more appropriate than a denial of eligibility.

Eligibility determinations should be based on an individual's functional abilities to use fixed route service rather than his proximity to a bus stop. Eligibility determinations must consider an applicant's ability to travel to any origin and destination within the service area. Not all trips that the individual might wish to make will begin at home, and the environmental conditions around each fixed route stop that might interact with a rider's disability to prevent fixed route use (existence of curb cuts, terrain, or accessibility of intersections, for example) are not necessarily identical to those around the stop that is closest to the individual's home.

If conditional eligibility were part of the CAT's process for determining eligibility for Links service, that would be the appropriate determination for those applicants who are able to use fixed route for some but not all. Specific trips for these riders would be eligible trips when the distance to or from a bus stop for a particular trip is greater than the distance that the person can reasonably and consistently travel, as one example.

If CATS finds that it cannot appropriately grant conditional eligibility to those riders who appear to be candidates based on the information provided by their respective health professionals, it must continue to grant full (or unconditional) eligibility to such individuals, rather than deny them eligibility for ADA paratransit service.

When an individual's application for Links service does not clearly indicate how the rider's disability or condition affects his or her ability to use the fixed route system independently, CAT should conduct additional follow-up with the named health care professionals. CAT may further consider implementing the use of in-person interviews or assessments as part of its eligibility process, as an additional opportunity to obtain information about an applicant's abilities. If CAT considers implementing conditional eligibility, in-person interviews and assessments are an essential element of the process.

Application Processing Times

The DOT ADA Regulations at Section 137.125(c) requires CAT to treat an applicant as eligible and provide service until and unless CAT denies the application, if an eligibility determination has not been made within 21 days of the receipt of a completed application.

To assess the timeliness of eligibility determinations, the review team reviewed the log of 78 applications processed by CAT from August through October 2009. For three of the applications, the date of a determination letter could not be verified. These three individuals may have been entitled to presumptive eligibility.

Table 6.3 shows the elapsed time between the receipt of the completed application and the letter of determination for each of the 75 processed applications with dated notification letters.

Table 6.3—Application Processing Time for 75 ADA Paratransit Determinations Made July 2008, February 2009, and March 2009

Number of Days Required to Make Determination and Send Notification Letter	Number of Determinations	Cumulative Determinations	Cumulative Percent
7 or fewer days	29	29	37%
8 to 14 days	23	52	67%
15 to 21 days	20	72	92%
All 21 days or less	72	72	92%
22 to 26 days	3	75	96%
Date not verified	3	78	100%

Seventy-two applicants (92 percent) in this sample were notified of their eligibility determination in 21 days or less following the receipt by CAT of a completed application. Processing time for those 72 applications ranged from 2 days to 20 days. Decisions regarding the eligibility of three applicants were made in 22 to 26 days, and therefore these individuals should have been granted presumptive eligibility.

At the time of the review, CAT required that individuals who had been determined to be eligible for Links service to obtain a photo ID card before they could begin using the service. In order to obtain the photo ID card, the individual was required to travel to a CAT office to pick it up in person. CAT would provide transportation, but at a cost to the individual. Requiring the rider to pay for the ride to the CAT office to obtain the photo ID is a type of user fee, which is not permitted by the DOT ADA regulations. CAT is responsible for the cost of transportation to and from the CAT office to obtain a photo ID. The letter granting eligibility should be considered a temporary ID until the rider has their photo taken for a permanent ID card.

Appeal Process

Individuals who wish to appeal their eligibility determinations may do so by notifying the CAT Executive Director in writing within 60 days of the determination. While the description of the appeal process in the Handbook states that Links Paratransit will respond within 30 days of the submission of the appeal request, in practice the Director of Transportation sets up a meeting so that the individual can present additional information about his or her condition. The Executive Director and the Director of Transportation make the final determination regarding the appeal. Links Paratransit staff noted that as of the time of the review team's visit, they have not received a request for an appeal.

Section 37.125(g)(2) of the DOT ADA regulations states that the eligibility appeal process must include a separation of functions, so that the decision regarding the appeal is made by a person not involved in the initial decision to deny eligibility. Appendix D further explains that the person who decides the case on appeal, to the extent practicable, should not have been involved in the original decision as a member of the same office or a supervisor or subordinate of the individual who made the original decision. Where the degree of separation necessary is not feasible, the second decision-maker should not have been a participant in the original decision. Therefore, individuals other than the Executive Director and the Director of Transportation should conduct appeal hearings and make final eligibility determinations.

6.5 No-Show Suspension Policy

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. While such a “pattern or practice of missing scheduled trips” represents the only circumstance under which the DOT ADA regulations permit such suspensions, FTA has permitted entities to regard late cancellations in the same manner when they have the same operational effect on the system as a no-show. This generally means a cancellation within one to two hours of the scheduled trip time. The review team reviewed CAT’s policies, procedures and practices regarding suspensions of service for rider no-shows and short-notice cancellations as part of this assessment.

The Handbook describes the Links Paratransit no-show/cancellation policy. After each rider no-show or short-notice cancellation (defined as providing less than 4 hours’ notice of a cancelled trip), riders will receive a written warning from CAT. Charges of a no-show or short-notice cancellation may be appealed by submitting a written request within 10 days of the receipt of the warning notice. After the third no-show in 6 months or third short-notice cancellation in 6 months, riders will be suspended from using the service for 30 days, beginning 10 days after the notice of suspension is mailed. Suspensions of service may be appealed by submitting a request in writing within 10 days of the date of the suspension notice, and will receive a final determination within 10 days of the submission of the appeal request.

The Director of Transportation indicated that CAT has never enforced its no-show/late-notice cancellation policy or suspended any rider from use of Links Paratransit service. He further stated that no-shows and short-notice cancellations help to free up space in vehicle schedules that can be used to accommodate trips that are guaranteed but not yet assigned to a route. The use of lists in the scheduling process is discussed in detail in Chapter 9. However, even if it is not enforced, the written policy should be one that would enable CAT to accurately identify riders who exhibit a pattern or practice of missing scheduled trips. The policy in place at the time of the review was based on an absolute number of no-shows or short-notice cancellations and did not consider the frequency of travel. Considering only three no-shows or short-notice cancellations in a 6-month period as grounds for suspension unreasonably limits service to ADA eligible customers, discourages use of the service and unfairly penalizes regular riders.

Appendix D to the DOT ADA regulations at Section 37.125 states that suspension of service for no-shows are intended to prevent “a pattern or practice of ‘no-shows’” and further notes, “a pattern or practice involves intentional, repeated or regular actions, not isolated, accidental or singular incidents.” It is likely that a frequent rider could amass three no-shows in a six month period without meeting the definition of pattern and practice. In addition, the regulation states that trips missed by the transit provider cannot be counted against the rider and only those no-shows within the rider’s control can be counted against the rider.

6.6 Findings

1. At the time of the site visit, the only accessible format in which application materials are available is large print, although Braille and audio tape were listed as options on the Links Certification Form. Section 37.125(b) of the DOT ADA regulations states that all information related to eligibility and the eligibility-determination process must be made available in

accessible formats, upon request. While materials do not need to be in the particular format that an individual may prefer, they must be in a format that the individual can use. Large print does not meet the needs of all potential applicants.

2. CAT requires individuals who have been determined to be eligible for Links service to obtain a photo ID card at the CAT office, and incorrectly charges a fare to individuals who use Links for the trip to obtain their ID card. This requirement prevents individuals who have been determined eligible from receiving service due to the lack of an ID card and represents a capacity constraint, delays the effective date of eligibility and violates the prohibition against application fees and special charges found in Section 37.5 of the DOT ADA regulations.
3. CAT must make eligibility determinations based on the individual's functional ability to use fixed-route transit, and not use the applicant's home address as a basis for denying eligibility. Appendix D to Part 37, under Section 37.131, states that an eligible user who lives outside the service area must be picked up if they can find a way to get to a pickup point within the corridor. The DOT ADA regulations require complementary paratransit service be provided between any origin and destination point within the service area.
4. Based on a review of a sample of application files for individuals who had been denied ADA paratransit eligibility between March 2008 and October 2008, letters that CAT used to notify individuals that they are not eligible did not include specific reasons for the decisions as required by Section 37.125(d). The DOT ADA regulations require that eligibility determinations must be in writing, and if applicants are found to be ineligible, the determination must state the specific reasons for the finding. Appendix D further explains that the determination cannot merely state that the person has been found to be able to use fixed route service.
5. The letter that CAT sends to applicants who receive full (unconditional) eligibility does not include the expiration date for eligibility, as required by Section 37.125(d).
6. The letters that CAT sends to applicants who receive temporary eligibility or are denied eligibility do not include information about the appeals process as required by Section 37.125(d). Since temporary eligibility is a condition that limits eligibility, the notification letter must inform individuals of their right to appeal the decision.
7. CAT's committee that hears Links eligibility appeals includes the Director of Transportation and the Executive Director. However, the Director of Transportation is also one of the two individuals who makes initial eligibility determinations. Furthermore, he reports to the Executive Director. This arrangement is inconsistent with Section 37.125(g) of the DOT ADA Regulations and Appendix D. The eligibility process must include appropriate separation of functions, which means the same person must not decide the case on appeal. Additionally, the individuals who hear the appeal should not be a supervisor or subordinate of an individual who made the initial decision.
8. CAT's written no-show policy imposes suspensions of service on riders who fail to appear for a scheduled trip three times in a period of 6 months. This threshold for a potential service suspension unreasonably limits service to ADA eligible riders. Appendix D to the DOT ADA regulations at Section 37.125 states that suspension of service for no-shows are intended to prevent "a pattern or practice of 'no-shows'" and further notes, "a pattern or practice involves intentional, repeated or regular actions, not isolated, accidental or singular incidents."
9. CAT's appeal policy for suspensions of service requiring rider's to submit an appeal in writing within 10 days of the date of the suspension notice imposes an unreasonable administrative burden inconsistent with the requirements outlined in Appendix D to Section 37.125. The DOT

ADA regulations require that the appeal process used for eligibility appeals shall be available for appealing no shows for suspensions of service. Riders must be allowed to challenge charges of a no-show or short-notice cancellation over-the-phone and in-person, rather than requiring a written submission.

6.7 Recommendations

1. CAT should make its ADA paratransit service eligibility form (Links Certification Form) and Handbook available not only in large print but in other accessible formats upon request. Possible formats include Braille, electronic file on CD or via email, and audiotape. Because the Handbook is sent to applicants and includes information about the eligibility-determination appeal process, CAT should make that document available in accessible formats as well.
2. CAT should consider establishing conditional eligibility as one of its categories of eligibility. CAT could collect the information that it would need to it to make determinations about the eligibility of an individual for some trips and not others during the eligibility determination process. If conditional eligibility and trip by trip eligibility were applied appropriately as part of Links determination process, this two-step process could help identify paratransit trips that could potentially be served by fixed route services.
3. The letters granting full eligibility and recertification of eligibility contain some potentially confusing language in its definition of eligibility. The letter indicates that eligibility is on a trip-by-trip basis, even though at the time of the review, CAT was not granting conditional eligibility nor implementing trip by trip eligibility. This language may cause riders to think that they have less than full eligibility.
4. Until CAT begins to apply conditional and trip-by-trip eligibility, CAT should not include information on trip-by-trip in its letter to individuals who receive full eligibility, either initially or during recertification.
5. For individuals who use Links to travel to the CAT office to obtain the required photo ID card, CAT should offer the trip free of charge. For individuals who are determined to be eligible and are unable to obtain the required photo ID card within the 21-day period, CAT should allow them to use the letter from CAT as a temporary ID until such time as they receive their photo IDs.
6. CAT should not base eligibility for Links on the home address of the applicant. If an applicant lives outside of the Links service area, CAT should advise the applicant that LINKS would provide service for trips with origins and destinations within the service area; it would be the applicant's responsibility to travel to a pickup point within the service area, where the service would pick him or her up. The same would be true on the destination end of the trip. CAT should also revise its Handbook so that residence within the Links Paratransit service area is not listed as a requirement for ADA paratransit eligibility.
7. When CAT denies or limits eligibility for ADA paratransit service, the letter to an applicant should provide specific reasons for the decision—rather than merely reciting that the applicant is able to use fixed route service.
8. CAT should revise the letter that it sends to applicants who receive full (unconditional) eligibility to include the expiration date for eligibility.

9. CAT should revise its letters denying eligibility and those granting temporary eligibility to insure that they contain all the elements required by Section 37.125(d).
10. The Director of Transportation and other CAT staff as appropriate should pursue ADA paratransit eligibility training through the National Transit Institute.
11. CAT should change the composition of its ADA eligibility appeal committee so that the Executive Director and the Director of Transportation are not involved. Staff of the local Center for Independent Living or disability organizations, an ADA Compliance Officer or ADA Coordinator from one of CAT's member jurisdictions, health care professionals, or riders might be appropriate members of an appeal committee.
12. CAT must treat an applicant as eligible and provide service until and unless the entity denies the application under Section 37.125(c) if a decision is not made 21 days following submission of a complete application. A sample review of applications indicated that CAT is not tracking processing time appropriately and may not be providing presumptive eligibility to riders who determinations take more than 21 days.
13. CAT should revise its appeal procedures to allow for rider's to challenge service suspensions, as well as charges of a no-show and short-notice cancellation, in-person, over the phone, and/or in writing.
14. CAT should revise its no-show policy to consider not only an absolute number of no-shows, but also the frequency with which a rider no-shows before imposing suspensions, perhaps as measured by a percentage of trips requested in the 30-day period. If CAT measures by percentage, it should be based on the system wide percentage of no shows and adjusted upwards, so as not to penalize frequent riders
15. CAT should revise its definition of a short-notice cancellation. The definition of short notice should be based on operational considerations such as: the amount of advance time to avoid dispatch of the vehicle to the pickup location and to allow for redeployment of the vehicle to serve other trips. CAT's consideration of cancellations for Links trips to be late if made less than four hours before the scheduled pickup should not pose the same level of operational impact as a no-show. A reasonable definition may be a cancellation that is made less than 1 or 2 hours before the scheduled pickup time.

7 Telephone Access

Telephone access for placing or changing trip reservations or checking on the status of rides is an important part of ADA complementary paratransit operations. Experiencing significant telephone delays to place trip requests or to check on rides could discourage people from using the service and could therefore be considered a form of capacity constraint.

Review team members collected the following information about telephone access:

- Rider input through telephone interviews with riders, advocates, and agencies
- Performance standards for answering the telephone
- Design of the phone system and the staffing of phones
- Practices for handling of calls in both reservations and dispatch through direct observation

7.1 Rider Comments

Two of the individuals contacted in advance of the on-site review noted difficulty getting through on the phone to make a trip reservation or check on a ride. One said that if the phone line was busy on the first try, they always got through on the second.

The other said that sometimes the reservations phone lines are turned off before 7 p.m.

7.2 Phone Service Standards and Performance Monitoring

At the time of the site visit, CAT had informal standards for Links Paratransit telephone performance. According to CAT's response to the FTA notification letter, the hold time is 1 to 3 minutes, and the call-answering standard is within 2 minutes of the first ring. CAT does not have any system (automated or otherwise) to monitor Links Paratransit telephone call volume or call data. As a result, CAT has no means to systematically monitor Links Paratransit telephone performance or to compare performance to the standards.

7.3 Phone System Design

Links has one telephone number and two lines (501-375-9607) for voice and another number for TTD only. Three telephones are available to four staff members.

If both lines are in use, the caller gets a busy signal. Incoming calls do not bounce or roll to another CAT telephone line, an answering machine or voicemail when the Links Paratransit office is staffed.

Both lines are used for all Links Paratransit calls (incoming and outgoing) as follows:

- Trip reservation requests
- Reservation changes and cancels
- Trip confirmations
- Where's my ride? inquiries
- Complaints (riders can also call main CAT telephone number)
- Eligibility requests

- Other Links Paratransit information queries
- Outgoing trip time callbacks (primarily 4:30 to 7 p.m. on weekdays)

7.4 Reservations and Dispatch Staffing

At CAT, the responsibility for reservations, scheduling and dispatching processes primarily rests with two Paratransit Schedulers. The Links telephone lines are answered during all hours when the Links office is open, covering weekdays from 4:30 a.m. to 7 p.m. and Saturdays from 4:30 a.m. to 1 p.m.

On weekdays between 7:30 a.m. and 5 p.m. there are two to four Links Paratransit staff working. On weekdays from 4:30 to 7:30 a.m. and 5 to 7 p.m. there is one Links staff member working. One Links staff person works on Saturday. During other hours, a recording refers the caller to CAT's fixed route dispatcher.

Riders may make trip reservations during any hour when the Links Paratransit office is open. After 1 p.m. on Saturday and all day Sunday, Links Paratransit does not accept reservations.

CAT does not operate on six holidays (New Year, Memorial Day July 4, Labor Day, Thanksgiving, and Christmas). On these days, the Links Paratransit office is also closed and it does not accept trip reservations.

7.5 Observations of the Call-Handling Process and Telephone Service Performance

As noted earlier in this section, CAT does not monitor telephone performance, call volume, or times when all lines may be in use. Review team members observed regular instances during the workday when both Links Paratransit telephone lines were in use. During these times, anyone who tried to call Links Paratransit would get a busy signal (to confirm this, a team member called when both lines were in use and got a busy signal).

In addition, as noted above, one Links Paratransit staff member's primary responsibility on weekdays from 4:30 to 7 p.m. is to call riders to provide the pickup times for the next day's trips. This occupies one of the two Links Paratransit telephone lines—both for riders who want to make trips requests and for those with "Where's my ride?" questions. It is likely that callers receive busy signals during this period.

7.6 Findings

1. Riders may make trip reservations during any hour when Links Paratransit staff is in the office. After 1 p.m. on Saturday and all day Sunday, Links Paratransit does not accept reservations. Also, on six holidays, the Links office is closed, and thus does not accept reservations for next-day trips. These policies and procedures are inconsistent with §37.131(b)(1).

7.7 Recommendations

1. CAT should formalize its standards for Links Paratransit telephone performance. These performance standards should specify a proportion of calls that should meet the standards for

a given time interval (e.g., fewer than X percent of calls on hold for more than 1 minute each hour).

2. CAT should begin to monitor telephone performance for Links Paratransit service, as it does not have a system (automated or otherwise) to monitor call volume or data, and as a result cannot measure telephone performance versus its standards. Even without the expense of obtaining call-monitoring software, CAT could request an analysis of line use and a busy signal analysis from its telephone service provider. CAT should increase the number of telephone lines available for Links Paratransit.
3. CAT should change its Links Paratransit telephone system so that callers do not get a busy signal if all lines are in use. The calls should roll to another CAT line or the caller should be given the option to be put on hold.
4. CAT should accept requests for next-day trips during regular business hours on all days when Links Paratransit service is provided on the next day. This includes Saturday afternoons, Sundays, and holidays. CAT may choose to accept trip requests via voicemail or other automated systems—as long as the caller is assured of receiving that trip for the next day.

8 Reservations

This section of the report covers how CAT handles trip requests from riders. While on site, the review team observed call center operations while the paratransit schedulers were accepting trip requests. This chapter also looked at policies and procedures regarding negotiation of requested trip times. Team members gathered the following information:

- Comments from riders and advocates through telephone interviews and review of complaints on file with FTA and CAT (See Chapter 1)
- Reservation policies, procedures, and performance standards
- Service reports by CAT showing trips served and trips denied during the previous five months (May through September 2009)
- Observations of the trip reservation process and interviews with call center staff

8.1 Rider Comments

As noted in Chapter 2, CAT underwent a Triennial Review in 2009. That review found that between January and April 2009, CAT had reported trip denials ranging from 1.7 percent of trip requests to 2.9 percent of trip requests.

8.2 Service Standards

Section 37.131(f) of the DOT ADA regulations prohibits capacity constraints limiting the amount of ADA complementary paratransit service. Capacity constraints may include any operational pattern or practice that significantly limits the availability of service including but not limited to substantial numbers of trip denials or maintaining waiting lists for non-subscription services.

According to information sent to the review team in advance of the site visit, CAT has a policy that trip denials are not to exceed 2 percent, with a long-term goal of eliminating trip denials within three years (refer to Attachment E, Item #4). This policy and goal is not in compliance with the DOT ADA regulations and FTA technical assistance on trip denials.

As noted in Chapter 7, CAT accepts trip requests Monday through Friday from 5 a.m. until 7 p.m. and on Saturday from 8 a.m. until noon. Riders may call on Sundays to cancel rides only. Trip requests for next-day service may be made up until 4:30 p.m. the day before service, Monday through Friday. After noon on Saturday and all day Sunday, riders may call and leave a voice mail message to cancel rides. Trip reservations may not be called in after noon on Saturday or all day Sunday.

Since fixed route and ADA complementary paratransit service is available seven days a week, riders must have the opportunity to request service on Saturday for Sunday, and on Sunday for Monday. As discussed in Chapter 7, the call center arrangement in place at the time of the review prevents CAT from meeting its obligations under the ADA to provide next-day service for Sunday or for any time on Monday. Subscription service is available for riders who have trips going to and from the same location on a regular basis. CAT has no rule about a minimum number of days per week a person must ride to receive subscription service. According to the Handbook, riders with subscription trips must call after 4 p.m. the day before service to verify their pickup time.

All requests for new subscription service go the Paratransit Coordinator. When a person calls for a new subscription trip, the paratransit coordinator obtains information concerning the days of the week, the times needed and the pickup and drop-off addresses. Based upon this information, and the paratransit coordinator's knowledge of what is already scheduled, the rider is informed if there is space available for the requested trip. If space is available, service can generally start within one week. Until the subscription service can start, a rider may call in the trip request on a demand basis. If there is no space available to accommodate the trip, the person is informed while on the telephone and may call in the trip requests on a demand basis.

CAT does not keep a list of subscription requests that cannot be accommodated. The paratransit coordinator scans the list of trips requested to determine who is calling in multiple trips with the same pickup address, drop-off address and requested times at one time and therefore may be a candidate for subscription service. Riders with subscription trips may make temporary changes to times or destinations. Temporary is defined in the Handbook as less than 14 days in duration. Changes of more than 14 days in duration require a new subscription request to be submitted.

With regard to non-subscription or demand trips, the Handbook states "when possible, reservations should be made at least 24 hours in advance. Reservations will be accepted for ADA Paratransit Eligible riders up to fourteen (14) days in advance of the time the service is needed." However, the Handbook also states that "when possible Links requests a minimum of two to three days notice be given for adequate scheduling of a trip." Based on the number of days in advance customers are calling to request a ride (see Table 8.1), this description of the reservation process has led riders to believe that they must call more than one day in advance in order to be assured of getting a ride. The DOT ADA regulations at Section 37.131(b) require CAT to schedule and provide service to eligible persons in response to a request made the previous day. The language in the handbook, and observed reservation and scheduling practices are inconsistent with the regulations.

CAT uses StrataGen's Adept software system to record trip requests. When a rider calls to schedule a trip, the paratransit schedulers use following procedures:

- Identifies the rider. Enters the rider's name into the computer
- Asks for the destination and enters it into the computer
- Asks the rider, "What time do you need to be there?"
- Enters the appointment time into the computer
- Asks the rider if a return trip is needed. If a return trip is needed, the scheduler enters the requested return time
- If the rider requests additional trips, scheduler enters them in a similar fashion
- Informs the rider that the trip is in the system, and he or she will receive a call the night before service to receive the pickup time

Staff indicated that for trips with appointment times, they enter an appointment time 10 to 15 minutes before the time requested by the rider. This is done to ensure that the rider will arrive at his or her location on time.

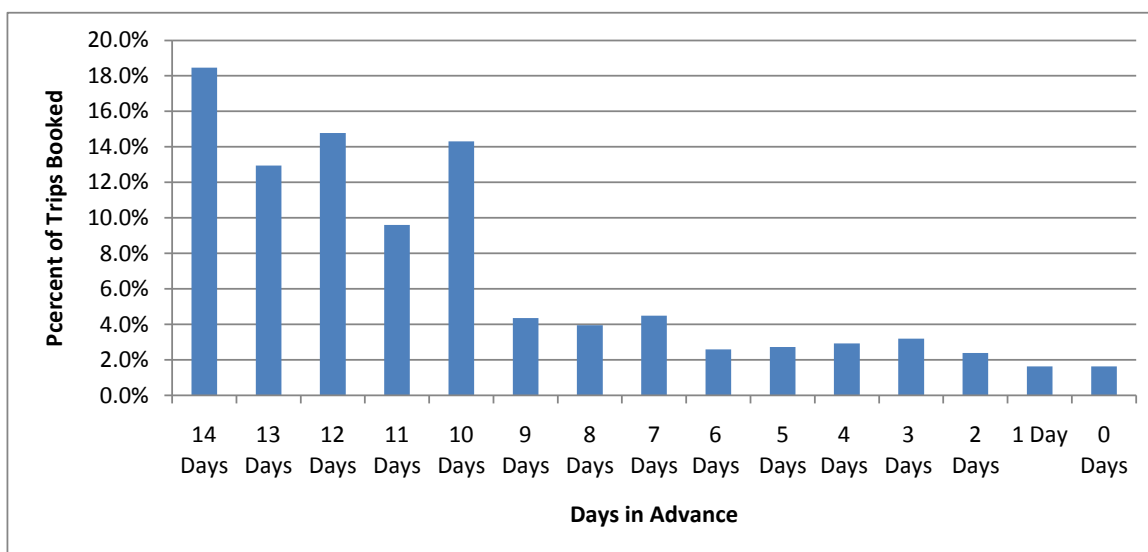
At the time of the review, CAT was unable to guarantee any trip requests for Links service. Based on the review team observations at the time, Links attempts to serve only those trip requests made 10 to 14 days in advance, either by Links vehicle or by taxi, and it cannot always

schedule trip requests made this far in advance . A trip request made 9 or fewer days in advance is not guaranteed to be provided. Paratransit schedulers actively prioritize calls and handle trip requests differently, based on how far in advance the call is made in relation to the day of service. If the trip is being requested 10 or more days in advance, the scheduler attempts to assign the trip to a run while the rider is on the telephone. The rider is not informed if the trip is successfully scheduled and he or she is not given a pickup time at that point. The scheduling process is completed by approximately 4:30 p.m. the day before service. At that time, customer callbacks begin. The staff person responsible for the callbacks calls riders the night before service between 4 p.m. and 7 p.m. and provides their scheduled pickup times. Riders who have called 10 days or more in advance, and whose trips have not been scheduled, are informed that they will get a call the next day when their trip is scheduled. Riders who called fewer than 10 days in advance and whose trip had not been scheduled are called and informed that CAT cannot provide the requested trip.

A trip request made 9 or fewer days in advance, including all requests for next day service, is not guaranteed. If a trip request made 10 to 14 days in advance is not successfully scheduled, the scheduler saves it, unscheduled, to a “Wait List.” Trips on the Wait List are scheduled the day before service. Trips that are requested fewer than 10 days before service are not scheduled to runs but are saved, unscheduled, to a “Will Call List.” The paratransit dispatchers work to schedule trips from the Wait List first. Scheduler/dispatchers then try to schedule trips that from the Will Call List after working on the Wait List. Any unscheduled trips remaining on the Wait List are either scheduled to runs on the day of service or given to the taxi company to provide. On occasion, the taxi company also cannot provide the trip. Any unscheduled trips remaining on the Will Call List are ultimately denied. A second level of trip prioritization happens when trips are actually scheduled. This additional capacity constraint is discussed in Chapter 9.

The review team conducted a detailed analysis of trip reservations measuring how far in advance riders were calling to reserve rides, using the week of September 20 to 26, 2009. A special query was written using tools in the StrataGen software. The 401 subscription trips were excluded from the analysis, leaving 1,468 demand trip requests. The review team compared the date the trip was entered into StrataGen to the requested date of the trip to determine the number of days in advance the trip was requested. The results of the analysis were striking—and atypical of most complementary paratransit systems: 70 percent of trip requests (1,029 out of the 1,468) reviewed were made 10 days or more in advance of the desired trip date. Thirty percent (439 trip requests) were made 9 or fewer days in advance, including less than 2 percent that were requested the day before service. This analysis and direct observations, when considered with the Handbook’s description of the reservation process, reflect that CAT encourages customers to call as far in advance as possible to get the trip times they want, and the review team analysis shows that this is what a large proportion of Links customers do. They perceive that waiting until even 9 days ahead will result in a denied trip or a trip at a less preferred time.

Figure 8.1 displays the distribution of trips by the number of days in advance of service.

Figure 8.1–Booked Trips by Number of Days in Advance of Trip Date

8.3 Review of Recorded Trip Denials

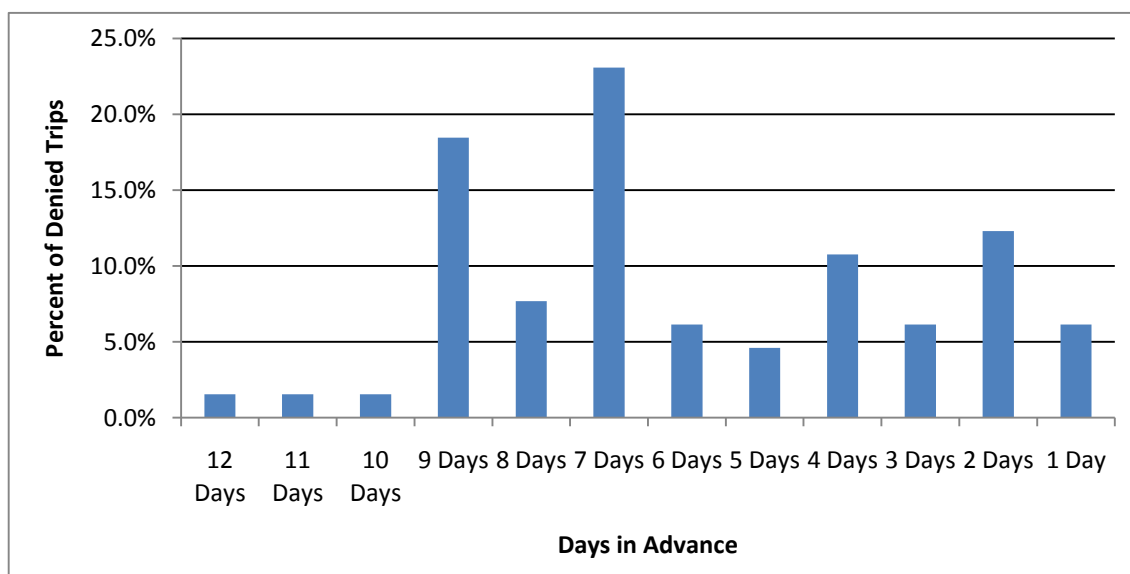
As noted in this chapter, the 2009 FTA Triennial Review of CAT found that CAT was experiencing trip denials due to lack of capacity. The Triennial Review indicated that trip denials for the period January through April 2009 ranged from 1.7 percent to 2.9 percent of trips requested. Material provided by CAT in advance stated that the long-term goal was to eliminate trip denials within 3 years. The goal at the time of the review was to have no more than 2 percent trip denials. This goal is inconsistent with the DOT ADA regulations at Section 37.131(f) prohibiting capacity constraints. The regulations state that CAT may not limit the availability of service through an operation pattern or practice that result in substantial trip denials. The appropriate goal and FTA's expectation is for CAT to plan, budget and schedule service to meet all of the expected demand.

While on site, the review team obtained a report listing trip denials for the period May through September 2009. The trips in the report are those for which no scheduling solution was found and the rider was informed that no trip was available. For the period May through September 2009, there were 39,425 trip requests, of which 645 (1.6 percent) were recorded as having been denied. This yields an average of 30 denials per week. The percent of trips denials ranged from a low of 1.2 percent (July and September) to a high of 2.6 percent (May).

The review team took a 10 percent sample of the 645 trip requests denied from May 2009 through September 2009 and conducted an analysis of trip denials, measuring how far in advance the denied trips were requested. The analysis showed that trip requests made fewer than 10 days in advance were more likely to be denied than trips requests made 10 or more days in advance. The review showed three of the 65 denials in the sample (4.6 percent) were requested 10 or more days in advance of the day of service. The remaining 62 denied trips (95.4 percent) in the sample were requested 9 or fewer days in advance of the day of service. Figure 8.2 shows the denial rates by day in advance ranged from 23.1 percent (trips requested seven days in advance) to 4.6 percent (trips requested five days in advance). Trips requested the day before service represented 6.2 percent of the sample reviewed. Overall, while 30 percent of the trip requests

were made 9 or fewer days in advance, the vast majority of trips denied (95.4 percent of the samples reviewed) were requested 9 or fewer days in advance of the day of service.

Figure 8.2–Trip Requested/Denials by Number of Days in Advance Trip Requested



The review team also analyzed the trip denial data to determine if there were days or times when trip denials were more prevalent. The analysis of trips denied by time of day showed that 129 denied trips (20 percent) had a requested time of between 3 and 4 p.m. Another 126 denied trips (19.5 percent) were trips that had a requested time of between 4 and 5 p.m. The analysis of trip denials by day of week showed that 187 denied trips (29.0 percent) were requested for a Wednesday. An additional 135 (20.5 percent) were trips requested for a Tuesday.

CAT should be counting as another form of trip denials those instances when an offer of a trip is made that is more than one hour from the time requested by the rider. The review team attempted to ascertain whether there were instances where non-responsive trip time offers were being made to riders. The review team asked for the callback sheets used to inform riders of their pickup times (described in Chapter 9). However, CAT staff reported that the callback sheets are not kept on file, but are discarded after the day of service. The review team attempted to generate a report showing requested time and scheduled time in order to make a comparison. Although a report was generated from the software, the review team was not confident with the accuracy of the data reported because the review team had concerns about the number of times a scheduled time may have been adjusted during scheduling. Therefore an analysis of non-responsive trip times would not have been reliable.

8.4 Observations of the Handling of Trip Requests

On Monday afternoon and Tuesday morning (November 2 and 3, 2009), the review team observed the Paratransit Schedulers taking trip requests to observe reservation procedures. The process was observed for 4 hours over the 2 days. A total of 25 trip requests were taken while the review team observed the process.

As noted earlier in this section of the report, Links staff does not attempt to schedule all trips to runs while the rider is on the telephone. Almost all of the trip requests taken were not scheduled

to a run while the rider was on the telephone. In the few cases where a trip was scheduled to a run at the time of the call, the rider was not given a scheduled time by the scheduler. The scheduler explained to the caller that the trip may be moved and the original scheduled time adjusted during the scheduling process and that the rider will get a callback with the time of the trips the night before service. The call back process is explained in more detail in Section 9.

Of the 25 trip requests observed by the review team, 15 were booked using an appointment or drop-off time. The remaining nine were booked using a requested pickup time. Seventeen of the 25 trips (68 percent) were called in 10 days or more in advance of the day of service. This percentage is close to the percentage of trips during the sample week requested 10 days or more in advance (70 percent). None of the trip requests observed by the review team were for next-day service. When asked, staff indicated that they felt most people call 14 days in advance because they are concerned about getting a ride.

The review team asked why so few trip requests were received during observation periods. The call center staff indicated that many of the trip requests are received early in the morning. The paratransit coordinator works from 4:30 a.m. to 1:30 p.m. Her primary roles are to provide early morning dispatching and handle any overnight trip cancellations. In addition, she starts to accept trip requests at 5 a.m.

Table 8.1 shows information on the observed trip reservations, included date of the request, date of the trip, requested time and whether the trip was booked with an appointment time.

Interactions with the riders during the trip-booking process were conducted in a respectful manner. Team members observed that schedulers did not routinely repeat trip details back to the customer at the conclusion of each call. Repeating the details of the trip request back to the customer at the call's conclusion is a sound business practice and represents good customer service.

Table 8.1–Observed Trip Requests

Date Requested	Date of Trip	Days in Advance	Request Time	Appointment or Pickup
November 2	November 6	4	8:30 a.m.	A
November 2	November 6	4	10:40 a.m.	P
November 2	November 13	11	7:15 a.m.	A
November 2	November 13	11	3 p.m.	P
November 2	November 12	10	5:15 p.m.	A
November 2	November 12	10	6 p.m.	P
November 2	November 15	13	5 p.m.	A
November 2	November 15	13	5:05 p.m.	P
November 2	November 15	13	8:10 p.m.	A
November 2	November 15	13	8:15 p.m.	P
November 2	November 14	12	8 a.m.	A
November 2	November 14	12	10:30 a.m.	P
November 2	November 15	13	9 a.m.	A
November 2	November 15	13	2:30 p.m.	A
November 2	November 15	13	4 p.m.	A
November 2	November 16	14	4:30 p.m.	A
November 2	November 16	14	6:30 p.m.	A
November 3	November 17	14	8:50 a.m.	A
November 3	November 17	14	11:10 a.m.	P
November 3	November 5	2	9:45 a.m.	A
November 3	November 5	2	11:30 a.m.	P
November 3	November 6	2	11 a.m.	A
November 3	November 6	3	12:15 p.m.	P
November 3	November 7	4	9 a.m.	A
November 3	November 7	4	10 a.m.	P

8.5 Findings

1. CAT has a goal of a maximum of 2 percent denials on a monthly basis. It plans to eliminate denials within 3 years. These goals are not in compliance with the DOT ADA regulations concerning trip denials. The DOT ADA regulations at Section 37.131(f)(3)(i)(B) prohibit CAT from limiting the availability of paratransit service by a pattern or practice that significantly limits the availability of service to eligible individuals, including substantial numbers of trip denials. CAT must not plan for any level of denials other than zero.
2. CAT does not provide its riders with the ability to request trips on Saturday afternoon for Sunday; on Sunday for Monday trips; or on holidays for trips on the day after the holiday. The DOT ADA regulations at 49 C.F.R. § 131(b) requires that CAT provide paratransit service to eligible individuals in response to a request made the previous day.
3. When scheduling trip requests, Links staff explicitly prioritizes requests by how far in advance a rider makes the request. Links makes efforts to schedule and serve all trip requests made 10 to 14 days in advance, and it cannot guarantee all trips made that far in advance. These customers are guaranteed a ride, either by Links vehicle or by taxi. Trip requests made 9 or fewer days in

advance, including all trips for next day service, are not guaranteed a ride. This practice violates DOT ADA regulations at Section 37.131(b) which requires an entity to schedule and provide a trip in response to a request made the previous day.

8.6 Recommendations

1. CAT should revise its performance in terms of denials. CAT must plan for service that meets 100 percent of the expected demand. Eliminating denials must be made a priority.
2. CAT should reallocate and devote the additional resources to eliminate trip denials. Via improved trip assignments and reallocation of drivers and vehicles, Links staff may be able to eliminate a significant proportion of its trip denials: 30 denials per week is an average of five per weekday. While Appendix D to the DOT ADA the regulations acknowledges that isolated, accidental or singular denials may occur, a pattern or practice of practice of denials is not permitted under the DOT ADA regulations.
3. CAT must provide capacity for next-day trip requests. The review teams analysis suggests that riders are not confident of getting a ride the closer to the day of service a trip is requested. On an immediate basis, it must cease prioritizing trip requests of Links riders who call 10 to 14 days ahead over the trip requests of riders who call one day ahead. In the long term, it must provide capacity to serve all requests for Links service. While an entity *may* permit advance reservations to be made up to 14 days in advance (§37.131(b)(4)), the entity *must* schedule and provide service at any requested time on a particular day in response to a request for service made the previous day (§37.131(b)).
4. CAT must take the necessary steps to provide Links riders the ability to reserve rides on Sundays and the day prior to any day when Links is operating.
5. CAT must not prioritize trip requests based on the number of days it was made in advance of the trip. Schedulers should revise the trip-booking procedures to either schedule all trips to runs at the time of the call or to save trips as unscheduled for later scheduling regardless of how far in advance the trip request is made.
6. CAT should review and adjust the allocation of Links vehicles and driver resources to eliminate capacity constraints during hours of peak demand. Furthermore, CAT should analyze the current run structure in light of the high rate of trip denials experienced between 3 and 5 p.m. on weekdays.
7. CAT should also review and adjust the allocation of Links vehicles and driver resources to eliminate capacity constraints on Tuesdays and Wednesdays.
8. Links Paratransit staff should routinely confirm back the trip details to riders at the time the rider places the trip request.
9. CAT should keep daily callback sheets on file. These should be periodically reviewed to make sure that non-compliant scheduled times have not be assigned to trips. Any trips with non-compliant times should be coded as a trip denial, even if the customer accepted the time of the ride.
10. CATS should retain callback sheets used to inform riders of their pickup times, rather than discarding them after the day of service. Due to this lack of data, the review team was not able to draw any conclusions about the performance with regard to offers of pickup times

outside of the one hour negotiation window under Section 37.131(b)(2) of the DOT ADA regulations.

9 Service Performance

The DOT ADA regulations for ADA complementary paratransit service at Section 37.131(f)(3) define prohibited capacity constraints as any operational pattern or practice that significantly limits the availability of service including but not limited to: substantial numbers of: trip denials or missed trips; untimely trips; or trips with excessive trip lengths. The review team reviewed on-time performance, no-shows, missed trips, and on-board travel times for CAT's ADA complementary paratransit trips.

The review team completed the following activities to assess service performance:

- Gathered rider input regarding on-time and travel time performance through telephone interviews, and reviewed complaints filed with CAT and FTA
- Reviewed CAT's policies and procedures regarding the ADA complementary paratransit service
- Observed the reservations, scheduling, and dispatching functions performed by Links Paratransit staff
- Interviewed drivers and schedulers/dispatchers
- Reviewed travel time and on-time performance records
- Tabulated pickup and drop-off times recorded on manifests and compared the results to reported data
- Reviewed no-shows and missed trips
- Reviewed completed manifests to compute travel time for selected trips
- Compared the travel times of the selected trips to comparable fixed route travel times

9.1 Rider Comments

Input regarding on-time performance from agency representatives and Links Paratransit riders contacted prior to the on-site review was mixed. Interviewees were asked whether pickups were generally on time and were asked to estimate the number of times, for every ten trips, that Links Paratransit was late. Two respondents said that on-time performance was very good, trips are late no more than one out of ten times, and that there were no issues with getting to appointments on time. One of these respondents also said that Links Paratransit would call her cell phone if the driver were running late. Another interviewee said that trips were on time a "majority" of the time. A fourth interviewee stated that four out of six times, the ride would be cancelled (Links Paratransit would notify the user that no drivers were available), or the ride would simply not show up.

One of the agency representatives said that her clients sometimes complain about having to arrive too early at appointments.

With regard to on-board travel times and routing, all four of those interviewed indicated that there were no problems with either travel time or routing. They characterized travel time and routing as both "reasonable" and "appropriate."

9.2 Service Standards and Policies

On-Time Performance Standard

The on-time performance standard for Links Paratransit is plus or minus 10 minutes from the actual reservation time. The actual reservation (pickup) time is given to the rider when Links calls back riders between 4 p.m. and 7 p.m. the evening before the day of service. As explained in the Handbook, the on-time window is calculated in this fashion: if a pickup time is 9:15, the rider must be ready by 9:05. The Handbook states that the driver does not wait past the designated pickup time. A driver is considered to be on time if he or she arrives within the +/-10-minute window. The goal is 100 percent on-time performance.

Travel Time Policies and Standards

According to information provided by CAT in advance of the review, the travel time standard is that paratransit trips shall be 1 hour or less.

9.3 Scheduling and Dispatching Procedures and Operations

Scheduling

At CAT, the responsibility for reservations, scheduling and dispatching processes rests primarily with two paratransit schedulers, who also serve as dispatchers. The paratransit coordinator and paratransit dispatcher serve as backup dispatchers. At the time of the review, Links Paratransit was providing about 225 to 275 trips per weekday. Approximately 25 percent of the trips provided are standing order trips.

As explained in Chapter 8, scheduling standing orders is the responsibility of the Paratransit Coordinator. All standing orders are assigned to particular runs. Standing order schedules are not reviewed on a regular basis, but are reviewed when a rider requests a change to a standing order trip.

If there is room on a run for a standing order request, the standing order service generally starts within one week of the request, depending upon the days for which service is requested, and the first date the rider indicates the service is needed. This week lag time is a function of the schedules being opened 14 days in advance. The standing order is entered into the system and the trip appears on the assigned run at the assigned time the next time the schedule for that day is opened.

The scheduling of demand trips generally starts two days before the day of service, although the schedulers indicated that the bulk of the scheduling occurs the day before service. As described in Chapter 8, trips not scheduled to runs at the time of the call are saved to one of two lists: the Wait List or the Will Call List. The first step in the process is to re-optimize trips on the Wait List or Standby List. The process of re-optimizing is a function in the software that attempts to schedule trips from a designated list to runs, sometimes referred to “batch scheduling.” When that process is complete, the schedulers manually place the remaining unscheduled trips onto runs.

Schedulers have 15 scheduled runs each weekday to work with. Five of the runs are early straight runs, starting at 5 a.m. and ending at about 1:30 p.m. There are six split runs, starting at

5 a.m., ending between 9:30 and 10 a.m., and going back into service from approximately 2 p.m. until 6 or 6:30 p.m. There are two midday straight runs and two late runs (until about 10 p.m.).

Each scheduler approaches the scheduling process differently, which results in additional levels of prioritization. One scheduler works with trips in one-hour increments. For example, this scheduler will try to schedule trips that have requested pickup or drop-off times between 8 a.m. and 9 a.m. When she has scheduled as many of those trips as possible, she works with trips with requested times between 10 a.m. and 11 a.m., and so on. She selects a trip off of the Wait List, or Will Call List, scans the runs manually, and selects a run to place the trip on. Trips already scheduled to runs may be reassigned if the result of the reassignment results in a better grouping or routing. If needed, she may change the start or end time of a run to accommodate the need. She may also change the calculated pickup time for trips with appointment times, as long as changing the calculated pickup time will not make the rider late for their appointment. This scheduler tries to schedule as many of the trips from the Wait List (those requested more than 10 days in advance) before scheduling those trips on the Will Call List (those trips reserved less than 10 days in advance).

The other scheduler approaches the process by working run by run. This scheduler opens a run, and then scans the run to see what trips are currently scheduled. She may adjust trips within the run or reschedule the trips to another run. After scanning the run she goes to the Wait List to see if there is a trip or trips that would be appropriate for the run. After scanning the Wait List and selecting appropriate trips from that list, she will scan the Will Call List to see if there are any trips that can be placed onto the run from that list.

DOT ADA regulations at Section 37.131(f)(2) specifically prohibit limiting the availability of service through the use of waiting lists. CAT's use of the Wait List and Will Call list in scheduling raises two compliance issues. First, although riders whose trip requests are placed on the Wait List are guaranteed a ride, the use of the term Wait List is confusing and may result in a customer believing that their ride is not guaranteed. Second, since trips on the Will Call List are not guaranteed as noted below, the Will Call list functions as a waiting list as prohibited under the regulations. The way CAT uses these lists violates applicable DOT regulations regarding waiting lists. The expectation is that all trip requests will be accommodated.

Either scheduler may adjust the start and/or end time of a run to accommodate trip requests. Schedulers also stated that they may change the requested time of a trip to fit it onto a run. When asked, both schedulers were aware of and understood the negotiation window of plus or minus 60 minutes. Both schedulers indicated that they very rarely had to schedule a ride more than 60 minutes earlier or later than what was requested. They indicated that if they had to do that, they tried to contact the rider to ask if the new proposed pickup time was acceptable. They also indicated that they sometimes change a requested drop-off time when scheduling trips. Generally they move the requested appointment time 10 to 15 minutes earlier in order to ensure that the rider arrives at his or her destination on time. They indicated that they might move the appointment time later than requested depending upon the nature of the trip (for example, shopping). However, when the schedulers make these adjustments to requested pickup times or requested drop-off times, they are doing so without the riders' knowledge or consent.

Furthermore, the schedulers do not keep the information on the originally requested pickup or drop off time. As discussed later in this section of the report, without the originally requested times, on-time performance cannot be reliably computed.

Call Backs

When the scheduling is completed, usually by 4:00 pm to 4:30 pm the afternoon before service, a callback sheet is printed. It is the evening paratransit dispatcher's responsibility to call back all riders with their pickup time. Telephone calls are made to everyone on the list to give them their pickup times for the next day. As contact is made with the rider, or a message is left on an answering machine or voice mail, a check is placed next to the name and contact is considered to have been made. If no answer is received, it is noted on the list. The paratransit dispatcher indicated that he attempts to make a second call, if time permits before the end of his shift (7 p.m.), to all names on the list that he has not made contact with or left a message with. For riders on the Will Call list, the paratransit dispatcher tells them that CAT cannot accommodate their request, i.e., their trip is denied.

There are occasions when a customer is instructed to call the morning dispatcher in regard to their scheduled time. The first instance is if the customer, during call backs, objects to the given scheduled time. The evening dispatcher, who is responsible for call backs, will check to see if there was an error when reserving the ride. If no error was made he will instruct the customer to call the morning dispatcher to see if the scheduled time can be changed. He will also instruct the rider to call the morning dispatcher if an error was made and he is unable to reschedule the ride. Another occasion when a customer is instructed to call the morning dispatcher for schedule information is if the trip in question is on the Wait List. This list is the one with trips that were reserved 10 or more days in advance and for which no schedule option was available. These trips will be assigned to a CAT run the morning of service or they will be assigned to the taxi provider.

Links staff explained that a scheduled time that is more than 60 minutes from the requested time occurs "very infrequently." When this does occur, the callback list includes a note for that trip that explains that the time scheduled was the only time available. If the rider objects to the scheduled time given they are advised to contact dispatch the next morning. Callback sheets are discarded when the day of service is complete.

The trips on the Will Call list are those trips that riders have requested less than 10 days in advance of service, including all requests for next day service. Trips remaining on the Will Call list at the end of the scheduling process on the day before service are marked as denied in the computer and the customer is notified during the call back process. Handling the unscheduled trips at the end of the day in this fashion prioritizes trip requests trips 10 or more days in advance, and violates the DOT ADA regulations at Section 37.131(b), which states that a transit system "shall schedule and provide paratransit service to any ADA paratransit eligible person at any requested time on a particular day in response to a request made the previous day."

Dispatching

The dispatching responsibilities are shared by all paratransit office staff. Dispatching starts at 5 a.m. and continues until 7 p.m. Monday through Friday. On Saturday, the dispatch office is staffed from 4:30 a.m. until 1 p.m. During the times that the paratransit dispatching is not available, drivers contact fixed route dispatchers by radio for assistance. The staffing for the dispatch office (paratransit office) is shown in Table 9.1.

Table 9.1–Links Paratransit Work Schedules

Staff	Monday–Friday	Saturday	Sunday
Paratransit Coordinator	4:30 a.m.-1:30 p.m.	Off	Off
Paratransit Scheduler	7:30 a.m.-4:30 p.m.	7:30 a.m.-noon ¹	On-Call
Paratransit Scheduler	8 a.m.-5 p.m.	Off	Off
Paratransit Dispatcher	10 a.m.-7 p.m.	7:30 a.m.-noon ¹	Off

1 - Work alternating Saturdays

Links staff indicated that the paratransit scheduler on-call for Sundays checks the answering machines only for cancellations at 7 a.m. on Sunday and “about five times after that until noon.”

The paratransit coordinator is responsible for the morning pullout, dispatching, and answering telephones for cancellations of trip requests until 7:30 a.m. At 7:30 a.m., the first paratransit scheduler starts her shift and assumes responsibility for taking telephone calls from riders and providing dispatching services. The second paratransit scheduler starts her shift at 8 a.m. At that time, the primary responsibility for dispatching falls to the scheduler who worked on the schedule for the current day. The other scheduler works on finalizing the schedule for the next day and takes trip requests from riders. At 10 a.m., the paratransit dispatcher starts his shift, providing assistance with the radios and telephones.

The paratransit dispatcher is also responsible for scheduling any unscheduled trips from the day before. On the morning of service, any unscheduled trips on the Wait List are left as unscheduled on the list. After removing any canceled trips that come in overnight (via phone messages left on the answering machine), the paratransit coordinator schedules as many trips as possible off of the Wait List. Trips still remaining on this list are scheduled throughout the day of service by the paratransit schedulers, either on Links vehicles or with the taxi contractor. If a driver calls in sick or otherwise does not report for work, that paratransit dispatcher is responsible for reassigning trips from the affected run to the remaining runs. Any trips from the Wait List that cannot be scheduled to other runs are assigned to Yellow Cab. Morning shift drivers are required to call 20 minutes before their start time if they are not going to be at work. The 20-minute call-in timeframe for morning drivers to call off is very short and likely makes it impossible for the morning dispatcher to arrange for a timely substitute driver. This may lead to late pull-outs, late or missed trips. Drivers for later shifts must call at least one hour before their start time if they are unable to work.

It appeared that the interactions between staff performing dispatching duties and drivers were professional and respectful. The same was true of interactions with riders calling into the Links Paratransit office. Staff appeared comfortable using the dispatching tools in the software.

9.4 Driver Interviews

The review team interviewed nine Links Paratransit drivers. Two individuals had been driving for Links Paratransit for up to a year. Four drivers had 1 to 4 years of experience, two drivers had 5 to 8 years of experience, and one driver had been driving for Links Paratransit for 13 years.

The interviews covered:

- Whether the schedules the drivers are expected to perform are workable
- How often drivers run late and whether they find it necessary to run early to stay on

schedule

- Whether times on the manifests are consistent with times reported by riders
- The level of dispatch support provided
- Drivers' understanding of operating procedures: particularly the on-time performance window, no-show procedures, and rider-assistance policies

Comments about whether schedules are too tight, too loose, or just right were divided. Four of the nine drivers felt that schedules are fair, while five indicated that schedules are too tight and do not allow enough time to get from one pickup to the next. Four drivers indicated that they believe maintaining the schedule is the hardest part of their job.

The drivers interviewed demonstrated little understanding of the on-time pickup window, which is 10 minutes before to 10 minutes after the scheduled pickup time. Seven drivers replied they feel they are on time if they arrive two to three minutes or more ahead of the scheduled pickup time. Two drivers thought the on-time window might be -10/+10, but were unsure. When asked whether riders seem to understand the pickup window, five drivers indicated that most of the time, riders are ready at their scheduled pickup times. Three drivers said that about half their riders are ready at the pickup time. The remaining driver replied that the majority of riders are not ready at the pickup time. Drivers were also asked if riders ever indicate that they were given a different pickup time than the one that is shown on the manifest. Eight of the nine drivers said that riders occasionally or often expect a different pickup time. Several drivers said that the difference between the pickup time on the manifest and the rider's understanding of the pickup time can be 15 to 20 minutes.

Eight of the nine drivers reported that they find it necessary to arrive at origins or destinations early when they can in order to stay on schedule later on. However, they also indicated that if they do arrive early and the rider is not ready to leave, they must wait until the pickup time or five minutes beyond. One driver noted that it is not possible to arrive early except for the first pickup of the day.

When asked about the procedure they are to follow if a rider does not appear when the vehicle arrives within the window, all nine drivers correctly indicated that they are to wait five minutes past the scheduled pickup time, and then call dispatch for instructions. Seven drivers also reported that they are to get out of the vehicle and knock on the door of the residence or building. Dispatchers usually try to call the rider and authorize the driver to leave if they are unable to make contact.

Comments about how often drivers find themselves running late were very mixed. Three drivers said they run late only when traffic is heavy or there is an accident or bad weather. Two drivers said running late happens about once a week. Two drivers said they run late two to three times a week. Two drivers reported that they run late almost every day.

When they find themselves running behind schedule, eight of the nine drivers interviewed call dispatch to request assistance; several drivers reported that they are required to call dispatch when running five minutes late. One driver indicated that she tries to get back on schedule on her own. Most of the drivers said that dispatchers try to move trips to other vehicles and are sometimes able to do that. Two drivers reported that trips are usually not moved. Several

drivers commented that they are able to confer with each other and that they either suggest changes to dispatch or trade trips after approval from dispatch.

All nine drivers indicated that they provide assistance to riders beyond the curb, but they demonstrated an inconsistent understanding of CAT policy. Some indicated that they provide assistance to the door, but believe that is against the policy. Others said that providing assistance through the door of a building (but not a residence) is allowed or required. One mentioned that the assistance policy is to provide assistance as necessary but “don’t push, pull, or carry.”

Six of nine drivers felt that special pickup instructions or other notes on the manifests are accurate. Two drivers indicated that special instructions are accurate only some of the time. One driver indicated that she does not pay attention to most extra information and that if she encounters a problem she contacts the dispatcher.

When asked about the condition of vehicles, three drivers indicated that they are in good repair while five replied that the fleet is in fairly good condition. All but one of the drivers reported that when they identify a mechanical problem, it is fixed or they are given a different vehicle. A frequent comment concerned problems with the older vehicles; the newer vehicles in the fleet are in better condition.

At the end of each interview, drivers were given the opportunity to raise other issues or make general comments. Comments included the following:

- The rider-assistance policy needs to be clarified
- Drivers could use more information about passengers’ need for assistance and use of mobility aids
- More time is needed in schedules for boarding riders who use wheelchairs, Sometimes three riders who use wheelchairs have to board at the same time (at the VA Hospital, for instance)
- Dispatch should be staffed during all service hours (no dispatcher is on duty after 7 p.m.)
- More drivers are needed. It is impossible to run on time and tight schedules are stressful for drivers.

9.5 On-Time Performance

Reported On-Time Performance

As discussed earlier, CAT has a goal of 100 percent on-time performance for pickups. The on-time window for pickups is -10/+10 minutes relative to the negotiated pickup time.

CAT produces a report for on-time pickup performance. The left hand column in Table 9.2 presents the CAT’s reported monthly on-time pickup performance for May to September 2009. The right-hand column presents reported on-time pickup performance for the sample week analyzed by the review team.

Table 9.2–Reported On-time Performance for Links Paratransit Pickups

	May to September 2009	September 20–26
Total Trips Provided	29,050	1,419
On time or early	88.6%	89.1%
1-15 minutes late	7.8%	7.7%
16-30 minutes late	2.5%	2.3%
31+ minutes late	1.1%	1.0%

During the sample week, 89.1 percent of pickups were on time or early. The review team found that the reported performance did not reflect the -10/+10 on-time window. Rather, the CAT report is based on a narrower on-time window of -5/+10 minutes. However, this does not change the performance statistics if early and on-time (in pickup window) are grouped together.

At the time of the review, CAT had no standard for on-time performance for Links Paratransit drop-offs (appointments). CAT records drop-off times and Links Paratransit trip data does indicate whether a trip has a requested drop-off time. However, CATS does not track or analyze Links Paratransit drop-off performance.

Furthermore, it appears that when Links Paratransit schedulers are creating vehicle schedules, they include the estimated pickup and arrival times for each trip on the driver manifests (and in StrataGen), but they do not save the pickup or drop-off times negotiated by riders and call-takers. These times may be changed manually during the scheduling process or by StrataGen. As a result, since the negotiated pickup and drop-off times cannot be determined, it is not possible to conduct a reliable analysis of on-time performance for either pickups or drop-offs.

The review team encountered another problem in determining on-time performance for Links Paratransit: there was no data for taxi trips. For the sample week, Yellow Cab provided 14 Links Paratransit trips (approximately 1 percent of all trips provided). While this is a small portion, the agreement between CAT and Yellow Cab does not discuss expected service levels—such as on-time performance or travel time. Furthermore, CAT does not monitor the service provided by Yellow Cab for Links Paratransit trips.

Calculated On-Time Performance for Sample Week

The review team performed an independent calculation of on-time performance. The sample data came from driver manifests for the sample week of September 20 to 26, 2009. The sample set consisted of every tenth trip on the manifests for that week. The data included pickup arrival and departure times, drop-off time (all recorded by the drivers), and appointment time (if available), along with route and date information. The total sample comprised 147 Links trips.

Table 9.3 shows the analysis of on-time pickup performance for the sampled trips. Considering all pickups that were in the window or early, on-time performance was 97.3 percent. This is much better than the performance reported by CAT for this week—CAT was calculating performance with the smaller window of -5/+10 minutes. If one counts only pickups within the window of -10/+10 minutes, then on-time performance for the sampled trips was 83 percent, 14.3 percent of the pickups took place before the beginning of the window.

Table 9.3—On-time Pickup Performance: September 20-26, 2009

Sample		Number	Percent
		147	100.0
Pickups in Window (-10/+10 minutes after negotiated time)		122	83.0
Pickups in Window or Early		143	97.3
All Early Pickups		21	14.3
	1-15 minutes	15	10.2
	16-30 minutes	6	4.1
	> 30 minutes	0	0.0
All Late Pickups		4	2.7
	1-15 minutes	4	2.7
	16-30 minutes	0	0.0
	> 30 minutes	0	0.0

Of the 147 trips, 75 had specified appointment times. The on-time drop-off performance for the sampled trips is presented in Table 9.4. The analysis shows that 84 percent of the sampled trips with appointment times had on-time drop-offs, while 16 percent arrived after the appointment time. In other words, roughly one of every six trips with an appointment arrived late. While CAT does not have its own standard, and while the proportion of significantly late drop-offs is not substantial, allowing 16 percent of trips to be dropped off late for appointments results in an operational pattern or practice that discourages Links customers from using the service.

Table 9.4—On-time Drop-off Performance: September 20-26, 2009

Sample		Number	Percent
		75	100.0
All on-time trips (before appointment time)		63	84.0
	1-15 minutes	57	76.0
	16-30-minutes	5	6.7
	31-60 minutes	1	1.3
	> 60 minutes	0	0.0
All Late Drop-offs		12	16.0
	1-15 minutes	12	16.0
	16-30-minutes	0	0.0
	> 30-minutes	0	0.0

In addition, a small proportion of trips with an appointment time had a very early drop-off. Only one trip (1.3 percent) in the sample arrived more than 30 minutes early. However, review team members observed that schedulers were pushing scheduled appointment times earlier than requested by riders (e.g., if a rider asked for a 9 a.m. drop-off, the scheduler entered 8:45 a.m.). This practice could potentially lead to an understating of on-time drop-off performance: for example, if a rider requested a 9 a.m. drop-off, the scheduler would enter 8:45 a.m., so an actual drop-off of 8:55 a.m. would be counted as late. On the other hand, this practice also leads to an excessive number of very early drop-offs.

Overall, the analysis of this sample week's data indicates good on-time performance for both pickups and drop-offs. However, as stated earlier, Links Paratransit does not save the pickup and drop-off times negotiated by riders and call-takers, so the foundation of this analysis is not certain.

9.6 No-Shows and Late Cancellations

As discussed earlier, Links has a very strict suspension policy for no-shows and late cancellation and requests that riders call at least 4 hours prior to the scheduled pickup time. At the time of the site visit, however, Links was not enforcing this policy. In fact, Links was not tracking rider no-shows. At the time of the site visit, Links was recording all no-shows as late cancellations.

As shown in Table 9.5, cancellations and late cancellations comprise over 20 percent of all requested Links Paratransit trips. Relative to other ADA paratransit systems, this is a high proportion of cancellations.

Table 9.5–Links Paratransit Cancellations as Proportion of all Trips Requested

Period	Cancels	Late Cancels	Trips Provided	All Cancels / (Trips + All Cancels)
May to September 2009	5,869	3,228	29,050	23.8%
September 20 to 26	256	129	1,419	21.3%

9.7 Analysis of On-Board Travel Times

The review team conducted an analysis of the travel time for 1,419 trips provided during the sample week. Two reports were generated, one for trips exceeding 60 minutes (16 trips) and one for trips exceeding 45 minutes (84 trips). The average (mean) travel time of the trips listed on the report was 55 minutes. From the report, the review team selected 30 trips. With the assistance of the Director of Transportation, comparable fixed route itineraries were developed for the 30 selected trips.

The on-board travel times of the 30 selected trips via Links Paratransit ranged from 46 minutes to 82 minutes. The time was measured from the pickup location departure time to the arrival at the destination.

The fixed route travel times were determined from:

- Travel time on board each bus route
- Transfer time (time spent waiting for multi-leg trips)
- An estimate of the time to walk to and from the bus stop. Walking time was estimated to be 3 miles per hour. The review team estimated 12 blocks to a mile and calculated the time it would take to walk one block (about 1.7 minutes). For each itinerary the number of blocks to and from the bus stop was estimated and multiplied by 1.7 minutes. The result was rounded to the nearest minute to derive an estimate of walking time.

Table 9.6 compares the paratransit travel time to the comparable trip via fixed route. For each of the sample trips the origin and destination is shown. The addresses are rounded to the nearest 100 to maintain confidentiality. Also shown are actual departure and arrival time as well as a calculation of the total time on board the vehicle. The table then shows the comparable fixed

route itinerary including the routes that are needed to complete the trip, the calculation of travel time on board the vehicles, and the wait and walking time for each itinerary.

The last column compares the travel time of the paratransit trip to the estimated travel time for the comparable fixed route trip. A minus (-) sign before the number indicates that the travel time on the paratransit trip was shorter than on the comparable fixed route itinerary. A plus (+) sign before the number means that the paratransit ride time was greater than the ride time for the comparable fixed route itinerary.

- 26 trips (87 percent) involved one transfer
- four trips (13 percent) involved no transfers
- 26 trips (87 percent) had paratransit travel times less than the estimated travel time for a comparable fixed route ride
- Three trips (10 percent) had paratransit travel times greater than the comparable fixed route travel time
- One trip (3 percent) had a paratransit travel time equal to the comparable fixed route travel time.

The table shows that the average paratransit travel time of the trips in the sample was 58 minutes and the average estimated fixed route travel time for the trips in the sample was 80 minutes.

Only one (3 percent) of the three trips with longer paratransit travel times, trip #9, had a travel time that was more than 20 minutes longer than the comparable fixed route trip.

Comparison to Travel Time Standard

At the time of the site visit, CAT had a travel time standard that no paratransit trip shall exceed 60 minutes in length. An analysis of trip length for the sample week showed that 16 trips out of 1,419 trips provided, or 1.1 percent, had trip times in excess of 60 minutes. Further analysis of paratransit trips for the five-month period from May through September 2009 showed that 555 trips out of 29,312 trips provided, or 1.9 percent, had travel times exceeding 60 minutes. CAT meets its own travel time standard of 60 minutes or less on a minimum of 98 percent of trips provided.

**Table 9.6—Comparison of Travel Times on Links ADA Paratransit Service vs. Fixed Route for Selected Trips:
September 20-26, 2009**

ADA Complementary Paratransit Trip		Paratransit Travel Time		Fixed Route Equivalent					
Trip #	PU/DO Address (Rounded to 100 block)	Actual PU/ DO Times	Actual Ride Time (mins)	Bus Routes	Start/ End Times	On- Board Time (mins)	Walk/ Wait Time	Total FR Travel Time	Paratransit Time – FR Time (mins)
1	2700 Wolf St., Little Rock 1 Lile Ct., Little Rock	8:08 a.m. 9:11 a.m.	63	Route 16 Route 3	8:01 a.m. 9:42 a.m.	101	9	110	-47
2	4300 W 7 th St., Little Rock 6600 Delhaven Dr., N. Little Rock	2:50 p.m. 3:54 p.m.	64	Route 5 Route 13	2:35 p.m. 3:40 p.m.	65	7	72	-8
3	10300 W Markham St, Little Rock 800 C St., Little Rock	10:28 a.m. 11:14 a.m.	46	Route 3 Route 15	10:49 a.m. 11:57 a.m.	68	5	73	-27
4	100 Michael Ct, Little Rock 6900 Murray Rd., Little Rock	5:30 a.m. 6:18 a.m.	48	Route 3 Route 15	5:30 a.m. 6:30 a.m.	60	10	70	-22
5	6900 Murray Rd. Little Rock 1 Keller Dr., Little Rock	3:02 p.m. 4:04 p.m.	62	Route 15 Route 3	3:33 p.m. 4:27 p.m.	54	10	64	-2
6	100 E Capitol Ave., Little Rock 8300 Leatrice Dr., Little Rock	4:41 p.m. 5:30 p.m.	49	Route 1	4:47 p.m. 5:22 p.m.	35	7	42	+7
7	600 Jack Stephens Dr., Little Rock 5400 Southboro Dr., Little Rock	3:40 p.m. 4:44 p.m.	64	Route 5 Route 17	4:12 p.m. 5:27 p.m.	75	20	95	-31
8	3200 Wolfe St., Little Rock 1 Lile Ct., Little Rock	8:01 a.m. 8:50 a.m.	49	Route 11 Route 3	7:55 a.m. 8:30 a.m.	35	20	55	-6
9	900 Towne Oaks Dr. Little Rock 600 E. 7 th St., Little Rock	8:29 p.m. 9:42 p.m.	73	Route 8 Route 5	8:00 p.m. 8:34 p.m.	34	4	38	+35
10	8200 W. 36 th St., Little Rock 6900 Murray St. Little Rock	5:39 a.m. 6:38 a.m.	59	Route 14 Route 15	5:58 a.m. 7:40 a.m.	102	5	107	-48
11	400 Division St., N. Little Rock 6900 Murray St., Little Rock	5:25 a.m. 6:20 a.m.	55	Route 13 Route 15	5:45 a.m. 6:40 a.m.	55	5	60	-5

ADA Complementary Paratransit Trip		Paratransit Travel Time		Fixed Route Equivalent					
Trip #	PU/DO Address (Rounded to 100 block)	Actual PU/ DO Times	Actual Ride Time (mins)	Bus Routes	Start/ End Times	On- Board Time (mins)	Walk/ Wait Time	Total FR Travel Time	Paratransit Time – FR Time (mins)
12	2200 Fort Roots Dr., N Little Rock 1 Brookview Dr., Little Rock	2:06 p. m. 3:16 p. m.	70	Route 13 Route 8	2:05 p.m. 3:45 p.m.	100	10	110	-40
13	500 W. 22 nd St., Little Rock 300 S Rodney Parham Rd., Little Rock	8:09 a.m. 8:56 a.m.	47	Route 13 Route 8	8:21 a.m. 9:30 a.m.	69	10	79	-32
14	1 Somerset Dr., N Little Rock 2800 S University Ave., Little Rock	7:10 a.m. 7:56 a.m.	46	Route 4 Route 21	7:06 a.m. 8:10 a.m.	64	20	84	-38
15	5800 10 th St., Little Rock 6600 Gold Ct., Little Rock	3:51 p.m. 4:47 p.m.	56	Route 3 Route 17	3:50 p.m. 5:17 p.m.	87	9	96	-40
16	5800 10 th St., Little Rock 4200 Trust St., Little Rock	3:50 p.m. 5:03 p.m.	73	Route 3 Route 20	3:50 p.m. 5:10 p.m.	80	9	89	-16
17	2200 Fort Roots Dr., N Little Rock 1 Lamont Dr., Little Rock	3:16 p.m. 4:33 p.m.	77	Route 13 Route 17	3:50 p.m. 5:20 p.m.	90	13	103	-26
18	2800 S. Tyler St., Little Rock 9300 Treasure Hill Rd., Little Rock	4:43 p.m. 5:35 p.m.	52	Route 16 Route 8	4:58 p.m. 5:48 p.m.	50	10	60	-8
19	6900 Murray St., Little Rock 5900 John F Kennedy Blvd., N Little Rock	2:58 p.m. 4:05 p.m.	67	Route 15 Route 10	3:17 p.m. 5:10 p.m.	120	4	86	-53
20	3000 S Tyler St., Little Rock 2600 S Shackleford Rd., Little Rock	10:32 a.m. 11:21 a.m.	49	Route 16 Route 14	10:31 a.m. 11:55 a.m.	84	20	104	-55
21	1 Flag Rd., Little Rock 700 S. Main St., Little Rock	6:45 a.m. 7:31 a.m.	46	Route 5	6:38 a.m. 7:12 a.m.	34	12	46	0
22	200 Louise St., N Little Rock 6900 Murray St., Little Rock	5:43 a.m. 6:32 a.m.	49	Route 4 Route 15	5:45 a.m. 6:30 a.m.	45	7	52	-3

ADA Complementary Paratransit Trip		Paratransit Travel Time		Fixed Route Equivalent					
Trip #	PU/DO Address (Rounded to 100 block)	Actual PU/ DO Times	Actual Ride Time (mins)	Bus Routes	Start/ End Times	On- Board Time (mins)	Walk/ Wait Time	Total FR Travel Time	Paratransit Time – FR Time (mins)
23	5800 10th St., Little Rock 8800 Geyer Springs Rd., Little Rock	4:02 p.m. 4:51 p.m.	49	Route 3 Route 17	4:25 p.m. 6:12 p.m.	107	17	124	-75
24	1300 S Filmore St., Little Rock 6900 Murray St., Little Rock	5:35 a.m. 6:27 a.m.	52	Route 8 Route 15	6:44 a.m. 7:40 a.m.	56	4	60	-8
25	1 Shepherds Cy, Little Rock 8300 Doyle Springs Rd., Little Rock	3:06 p.m. 3:54 p.m.	48	Route 3 Route 15	3:07 p.m. 4:45 p.m.	98	24	122	-74
26	4300 W 7 th St., Little Rock 6600 Delhaven Dr., N Little Rock	3:11 p.m. 4:03 p.m.	52	Route 5 Route 18	3:12 p.m. 4:25 p.m.	73	13	86	-34
27	6900 Murray St., Little Rock 3300 Wynne St., Little Rock	2:57 p.m. 3:45 p.m.	48	Route 15 Route 14	3:09 p.m. 5:00 p.m.	111	5	116	-68
28	700 S Main St., Little Rock 100 Pleasant Valley Dr., Little Rock	4:09 p.m. 5:31 p.m.	82	Route 8	4:45 p.m. 5:26 p.m.	41	20	61	-21
29	700 Main St., Little Rock 100 W Windsor Dr., Little Rock	4:09 p.m. 5:03 p.m.	54	Route 17	4:45 p.m. 5:20 p.m.	35	7	42	+12
30	4500 E McCain Blvd., N Little Rock 10400 W 36 th St., Little Rock	3:27 p.m. 4:47 p.m.	80	Route 10 Route 14	3:30 p.m. 4:46 p.m.	76	20	96	-16
Average Paratransit Travel Time			58	Average Fixed Route Travel Time				80	-22

Note: Street addresses rounded to nearest 100th

9.8 Findings

1. At the time of the review, CAT did not negotiate pickup or drop-off times to ensure that offered pickup times did not require a Links customer to begin a trip more than an hour before or after the desired departure time or get to appointments late (when appointment times were known). On the day before service, riders receive a call with their pickup times. If they want a different time, they must call dispatch on the morning of service. The adjustment of requested pickup and/or drop-off times by Links schedulers outside of the pickup window without the rider's knowledge or consent does not constitute a negotiation consistent with FTA technical assistance and the DOT ADA regulations at Section 37.131(b)(2).
2. At the time of the review, Links schedulers actively prioritized and attempted to schedule only those trips requested 10 days or more in advance, and it could not guarantee all trips scheduled that far in advance of service. Such trip requests not scheduled by the day before service are placed on the Wait List and scheduled during the day of service—if necessary, to taxi contractor. In contrast, any trips requested less than 10 days in advance and not scheduled by the day before service—including all requests for next day service—are denied. These failures to schedule and provide next day service and patterns or practices of trip denials violate Sections 37.131(b) and 37.131(f)(3)(A) of the DOT ADA regulations.
3. Links staff stated that instances of a scheduled pickup time being more than 60 minutes from the requested time occur “very infrequently.” CAT was not aware that these constitute trip denials and not consistent with the DOT regulations at Section 37.131(b)(2). When this happens, CAT asks the rider to call dispatch on the day of service to try to make an adjustment.

9.9 Recommendations

1. CAT should correct the calculations in its reporting of on-time performance for Links Paratransit pickups.
2. CAT should negotiate pickup and/or drop-off times during the call when the rider is making the request to ensure that the rider is aware of the adjustments. CAT could contact StrataGen support to request assistance in configuring the system parameters in the software to allow more trips to be scheduled onto runs while the rider is on the telephone. Alternatively, CAT should guarantee that the adjusted pickup time will fall within the -10/+10 window of the originally requested time.
3. CAT must treat all trip requests equally without regard to the number of days ahead the request is made. CAT may not prioritize trips in its reservations and scheduling processes.
4. CAT must record and track any trips scheduled more than 60 minutes from their requested time as denials, even if the rider accepts the offer. CAT should also record and track any trips that are scheduled in a manner that is non-responsive to a rider's appointment time, if one is stated by the rider.
5. CAT should standardize the required call-in time for drivers calling in sick on the day of service to at least 1 hour for all shifts, since morning drivers may call in as late as 20 minutes before their start time if they are not going to be in work on a given day. The current operational practice creates short timeframes, making it very unlikely that Links can get a replacement driver in a timely fashion.

6. CAT should clarify for drivers and dispatchers that its policy is to provide origin-to-destination service to all riders, including assistance beyond the curb for those who need it. Based on comments made by a sample of Links Paratransit drivers during interviews with the review team, drivers appear to be aware of the need to provide assistance beyond the curb to riders who need it. However, drivers demonstrated an inconsistent understanding of the official Links Paratransit policy regarding passenger assistance beyond the curb. Limitations on assistance, such as the need to maintain sight of the vehicle and the prohibition against entering private driveways, should also be clarified. The assistance policy would be a good topic for an awareness meeting with drivers.
7. CAT should retrain its Links drivers so that they all understand the proper pickup window.
8. To accurately measure on-time performance for pickups and drop-offs, CAT should record negotiated pickup and drop-off times and print them on the manifests.
9. CAT should develop a standard for on-time performance for Links Paratransit drop-offs. CAT should begin to measure and monitor on-time performance for Links Paratransit drop-offs.
10. CAT should require Yellow Cab to provide pickup and drop-off information for Links Paratransit trips.
11. CAT should be aware of the significant portion of trips with late drop-offs (for trips that riders specify appointment times). It should adjust its operations to eliminate these late drop-offs.
12. CAT should investigate the reasons for the high proportion of trip cancellations. A high cancellation rate may be a reflection of the capacity constraints that compel riders to make trip reservations far in advance of their travel time; the further in advance a trip is reserved, the greater the likelihood of a change in plans. Reducing the number of cancellations—especially late cancellations—could increase Links Paratransit capacity.

10 Resources

The review team collected and examined information about the resources made available by CAT to provide ADA complementary paratransit service. This information included:

- Rider comments on driver performance and vehicle condition
- Input from drivers on training and vehicle condition
- Information on the vehicle fleet
- Number of drivers and driver tenure/turnover
- Availability of vehicles and drivers to cover scheduled runs
- Operating budget for the service and the process used to estimate funding needs

Ridership in the CAT service area was also compared with ridership in other systems using a national model.

10.1 Rider Comments

Three of the individuals contacted prior to the on-site review were able to provide input on drivers. Responses were mixed. One agency staff member said that the drivers are “wonderful” and that her clients routinely comment on how nice the drivers are. One paratransit user said that some drivers are helpful and some are not; some are happy to provide assistance and some refuse to help at all. A former user reported that the male drivers are professional and helpful, while the female drivers are generally short with riders and refuse to provide assistance.

Riders and agency staff were also asked about the condition of the Links vehicles. Both of the agency staff members reported hearing no complaints, while both of the users provided mixed reviews. They said some vehicles are clean and in good repair, while others are extremely dirty. One paratransit user said that the seatbelts in the older vehicles are covered in grease. Another user said that the suspension in some vehicles was bad, resulting in a rough ride.

As noted in Section 5, there were seven complaints about drivers out of the 25 complaints (28 percent) reviewed. Three of the complaints related to rude or improper behavior, three other complaints dealt with bad service and one complaint dealt with improper procedures. , In conversations with a review team member prior to the review, the individual who filed the complaint with FTA reported that while most drivers are “good,” others are rude, and drivers do not provide assistance consistently. It was also noted that vehicles frequently have mechanical problems.

10.2 Vehicle Fleet

Vehicle Age and Condition

At the time of the review, CAT had 20 vehicles available for paratransit service and two vehicles out of service for an extended amount of time for repairs. Model years ranged from 2002 (two vehicles) to 2009 (three vehicles), with an average fleet age of 4 years at the time of the review. The average mileage of the fleet at the time of the review was 122,400 miles; seven vehicles had mileage of over 200,000.

Drivers were asked their opinions about vehicle condition. Of the nine drivers interviewed, four felt that the fleet was in good repair, while five drivers mentioned problems with vehicle condition. One driver indicated that vehicles are “old and worn out,” another said “we need new ones.” Reported problem areas included engines, lifts, and heat or air conditioning systems. Newer vehicles were generally acknowledged to be in better condition than the older vans. Eight drivers reported that reported mechanical problems are usually corrected in a timely way; one driver disagreed.

At the time of the review team’s site visit CAT was anticipating the delivery of eight replacement vehicles shortly, with another four replacement vehicles to be delivered in January 2010. The replacement of the oldest vehicles in the fleet will bring the average vehicle mileage to approximately 26,000, with a maximum of 80,000 miles.

Vehicle Availability and Run Coverage

The maximum number of Links Paratransit runs that are in service at one time on weekdays (the peak pull-out requirement) is 17 runs. With a total of 20 vehicles currently available, CAT has three spare vehicles during peak times, or a spare ratio of 18 percent.

The review team examined CAT’s Daily Bus Availability Reports for the month of September 2009 to determine the actual number of vehicles available to deliver service each day as compared to the number needed to cover the peak pullout requirements. On five days out of the month, one vehicle was out of service for maintenance or repairs, leaving two spare vehicles if needed during each day’s service. On 10 days out of the month, two vehicles were out of service, but one spare vehicle was still available. On nine days out of the month, three vehicles were out of service. On those days, runs were covered using the Links fleet, but no spare vehicles were available to cover runs in the event of an accident or vehicle breakdown. On one day during September, five vehicles were out of service, leaving Links Paratransit two vehicles short of the 17 needed to cover the peak pullout requirement. CAT does not keep records that allow run closures to be tracked due to lack of available vehicles. In discussion with the review team, the Paratransit Coordinator indicated that on several occasions in October 2009 (the month preceding the site visit), runs had to be closed and trips reassigned to other runs or to CAT’s contracted taxi provider due to increased vehicle breakdowns.

10.3 Driver Availability, Turnover, and Training

The review team collected information about the driver workforce, including the total number of drivers as compared to daily service requirements, compensation levels and turnover, and driver training.

Driver Availability and Turnover

At the time of the on-site review, CAT’s operating budget included 22 full-time driver positions; 21 of those positions were filled.

One to two drivers at the bottom of the seniority list who are not assigned to vehicle runs on a given day are considered “report” drivers, and are available to cover work as needed if other drivers with scheduled or unscheduled time off are not available to assist with trips throughout the day. Report drivers may also be used to cover trips if a driver has fallen behind schedule throughout the day.

Reviews of driver records for the month of September 2009 indicated that between two and seven drivers were unavailable each weekday, leaving 14 to 19 drivers to cover the 17 peak pullout runs. On three weekdays during the month, enough drivers were available to cover the 17 runs and leave one to two report drivers available for work throughout the day. On seven weekdays during the month, all 17 runs were covered, but all report drivers were assigned to runs. On 13 weekdays during September, CAT had fewer drivers available than the number of peak-period runs. On 12 days, the workforce was either one or two drivers short, leaving runs uncovered, while on the third day, three runs were uncovered due to the unavailability of drivers. In situations such as these, CAT reassigns trips from uncovered runs either to other runs or to Yellow Cab.

CAT management staff indicated that they would like to have an additional 10 to 12 Links Paratransit drivers as a pool of potential fixed route drivers, and to expand the fixed route extra board from 13 to 16 to 17 drivers who would be available to cover both fixed route and paratransit runs.

Links drivers joined the union that represents CAT's fixed route drivers in 2003. Drivers either work in CAT's fixed route or Links operations, but are eligible to move into the fixed route operation after one year of service with Links. The most recent labor agreement with Links drivers, which took effect in July 2009 and expires in June 2012, provides for a starting wage of \$9.85, with annual increases to a maximum of \$14.40 after the employee's fourth anniversary. Wage scales increase annually over the 3-year term of the labor agreement, reaching a high in the final year of \$15.13 after the employee's fourth anniversary. Driver trainers earn an additional \$1 per hour.

CAT offers the following benefits to paratransit drivers:

- Life insurance and short- and long-term disability insurance at no cost to the employee
- Health insurance: 80 percent of the cost is paid by the company
- Dental and vision insurance: 100 percent of the cost is paid by the employee
- Uniform allowance of \$100 per quarter
- Deferred compensation plan with a company contribution of \$140 per month and a minimum employee contribution of \$25 per month
- Vacation days, beginning at five after one year, to a maximum of 25 days after 20 years
- Sick leave, beginning at 6 days after one year, to a maximum of 15 days after 15 years
- Six regular and four floating holidays

The review team also assessed the annual turnover rate among CAT's paratransit drivers. The Safety and Training Coordinator noted that driver turnover was high 5 to 6 years ago, but that the workforce is fairly stable now. Three drivers (14 percent) were terminated or left voluntarily in 2007 after they had completed the training period. Six drivers (27 percent) left CAT or were terminated post-training in 2008. In 2009, only two drivers left or were terminated post-training. Annual turnover rates among paratransit drivers of 30 to 40 percent are typical throughout the industry; CAT's turnover annual rates indicate a very stable workforce.

Driver Training

CAT utilizes a comprehensive hiring process and training program for new Links drivers. Driver candidates are interviewed by three to five staff members and undergo drug and alcohol testing, a driving record check, and a background check prior to being hired. The entire training process takes 7 to 8 weeks, with trainees earning the full new driver wage during the training period. Approximately two percent of trainees decide to quit during the process, and less than two percent are released by CAT.

The initial phase of training takes place in the classroom over 4 to 5 days. The topics covered include an introduction to CAT staff, equipment, policies and procedures, and the responsibilities of drivers and riders, defensive driving (National Safety Council's Coaching the Van Driver program), geography of the area, use of lifts and securement devices, and customer service.

On-the-road training consists of one week with each of the five senior drivers, with a progressive level of driving by the trainee. At the end of each week, the senior driver evaluates the trainee, both sign the evaluation report, which is reviewed by the Safety and Training Coordinator. At the completion of the five-week on-the-road phase, the trainee's progress is discussed by the trainee, the senior drivers, and the Safety and Training Coordinator.

Following training, new drivers undergo a 90-day probation and evaluation period. After 90 days, new drivers are evaluated by the Safety and Training Coordinator on on-time performance, documented by data from vehicle Mobile Data Terminals (MDTs), and on comments by senior drivers.

Ongoing training consists of awareness meetings held at least every other month, which provide opportunities to refresh or update instruction in various areas. Topics are selected by the Safety and Training Coordinator and the Paratransit Coordinator. At the time of the review, recent topics included on-time performance, pre-trip inspections, and discussions of issues of concern to drivers, such as maneuvering vehicles in tight spots. When CAT receives new equipment, the Safety and Training Coordinator becomes familiar with its operation and then trains drivers in small groups.

During on-site interviews, Links drivers were asked for their thoughts about the training they received as new drivers and any refresher training sessions. All nine drivers felt that the training they received when first hired adequately prepared them for the job, and noted the topics that were covered. All but one driver, who had been on the job only two months, verified that safety/awareness meetings are held from once a month to one every several months.

10.4 Other Staffing

Sections 7 and 9 of this report include a description of CAT staffing in the reservations, scheduling, and dispatch areas. While the number of staff members in each of these areas is low, cross training ensures sufficient coverage of the reservations, scheduling, and dispatch functions. Chapter 7 notes that CAT must extend reservation hours to include Saturday afternoons, Sundays, and holidays in order to come into compliance with the requirement to provide next-day service. As a result additional staffing in the reservations area will be needed.

10.5 Planning, Budgeting, and Funding

Review team members discussed the process of developing the Links Paratransit budget with CAT's Executive Director and Accounting Manager. To begin the budgeting process, the Accounting Manager contacts the Executive Director and department heads to identify changes from the previous year and prepares a draft budget for their review and comment. The final draft budget is voted on by a budget committee of the CAT Board of Directors, and then by the full Board.

Each year's budget is constructed on the basis of that of the previous year because that level of funding can be reasonably be expected from CAT's Board of Directors, which is made up of appointees that represent each of the entities that receive service from CAT. However, additional resources to support the Links operation are requested as needed. Over time, CAT management has successfully requested additional funding for a higher number of Links Paratransit drivers, items that have increased in cost significantly, such as diesel fuel, and service enhancements. For example, the 2009 budget included \$21,600 for initiating on-site interviews to determine eligibility in 2010 for Links service, continuing review of eligibility applications by the Director of the Arkansas Disability Coalition, and conducting rider satisfaction surveys.

Table 10.1 presents ridership data from CAT's annual reports to the National Transit Database (NTD) for 2006 to 2008 and the first eight months of 2009. ADA ridership increased by 2.2 percent between 2006 and 2007, and by less than one percent between 2007 and 2008.

Table 10.1–Links Paratransit Ridership, 2006 through August 2009

Year	ADA Passenger Trips	Change from Previous Year	Denials	Change from Previous Year
2006	55,836	NA	1,322	NA
2007	57,081	2.2%	971	-26.6%
2008	57,340	0.5%	2,081	114.3%
2009 (Jan-Aug)	45,870	NA	909	NA

In contrast, CAT's actual operating expenditures for the Links Paratransit service increased over the same period at much higher rates. As shown in Table 10.2, which presents expenditure and budget data supplied by CAT in advance of the on-site review, Links Paratransit operating expenditures increased by 6.9 percent between 2006 and 2007 and 12.7 percent between 2007 and 2008. The difference between actual expenditures in 2008 and the 2009 operating budget is 13.4 percent.

Table 10.2–Links Paratransit Actual Operating Expenditures, 2006 through 2008 and Operating Budget 2009

Year	Amount	Change from Previous Year
2006 Actual	\$1,090,819	NA
2007 Actual	\$1,166,147	6.9%
2008 Actual	\$1,314,733	12.7%
2009 Budget	\$1,447,245	13.4%

Future Plans

At the time of the review CAT did not have a written capital replacement plan, but management staff indicated that delivery of 12 replacement vehicles was scheduled for late 2009 and early 2010. As noted earlier in this section, these new vehicles will significantly decrease the average age and mileage of the Links fleet.

As mentioned in Section 2, CAT underwent a Triennial Review in 2009, which resulted in a finding of ADA paratransit trip denials due to capacity constraints. In response to that finding, CAT developed a plan for increasing ridership on fixed route services and adding paratransit capacity over the next several years. The plan calls for increases in the Links Paratransit operating budget as follows:

- **2009:** Contract with the Arkansas Disability Coalition in the amount of \$21,600 for assistance with screening of eligibility applications, assistance with on-site eligibility interviews, attendance at Advisory Council meetings, and conducting monthly rider satisfaction surveys and reports
- **2010:** Contract with the Arkansas Disability Coalition in the amount of \$47,850 for the continuation of 2009 activities, plus the development and implementation of a mobility-training program
- **2011:** Contract with the Arkansas Disability Coalition in the amount of \$47,850 for the continuation of 2010 activities, and the addition of one paratransit driver at a cost of \$29,000 (for a total of 23 full-time drivers)
- **2012:** Contract with the Arkansas Disability Coalition in the amount of \$47,850 for the continuation of 2011 activities, and the addition of one paratransit driver at a cost of \$30,000 (for a total of 24 full-time drivers)

10.6 Ridership

As shown above in Table 10.2, Links ADA paratransit ridership in 2008 was 57,340. To determine how this level of ridership compared with other transit properties, the review team used a recently developed national ADA paratransit ridership model to estimate the predicted ADA paratransit ridership in the Links Paratransit service area.

The national model, developed by the Transportation Cooperative Research Program (TCRP) and detailed in *TCRP Report 119, Improving ADA Complementary Paratransit Demand Estimation*, used data from 28 transit systems across the country to model ADA paratransit demand. The model estimates ADA paratransit demand based on the population of the service area, the base fare charged, the percentage of the population with household incomes below the poverty level, the effective window used to determine on-time performance, the percentage of applicants found conditionally eligible, and whether conditional eligibility is used to do trip-by-trip eligibility in operations.

To estimate demand for the Links Paratransit area using this national model, the review team used the following data:

- service area population: 165,615, from 2000 U.S. Census data
- base ADA paratransit fare: \$2.70

- service area poverty rate: 12.1 percent, from 2000 U.S. census data
- conditional eligibility rate: 0 percent
- on-time window: 20 minutes
- trip-by-trip eligibility: not used

Using these factors, the TCRP model estimated demand for ADA paratransit service in the Links Paratransit area to be 126,515 one-way trips. This is more than 120 percent higher than the Links Paratransit ridership reported for 2008. A copy of the summary page from the model showing the estimation for the Links Paratransit area is provided in Attachment F.

10.7 Findings

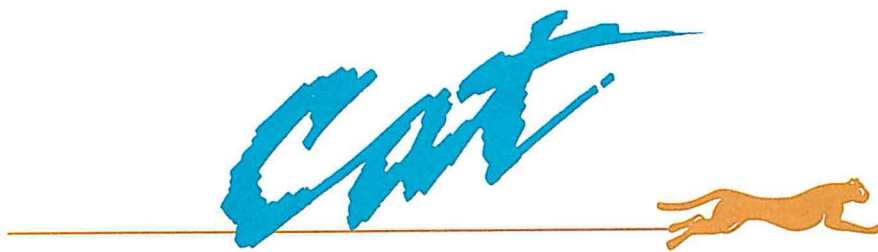
1. There are no findings of non-compliance in chapter 10.

10.8 Recommendations

1. CAT should plan to continue to replace vehicles on a regular basis to ensure a sufficient number of vehicles in good working condition to cover scheduled runs each day and provide several spare vehicles for use during the day as needed.
2. CAT should fill the open Links Paratransit driver position as soon as possible and proceed with its stated plans to request funding in 2011 and 2012 for an additional driver position in each of those years.
3. CAT should have some means to accept trip requests on the day before all Links service days during regular administrative hours. This can be live staff in the office or by automated means. CAT may be able to do this with the existing staff by adjusting work shifts. Staff in the reservations, scheduling, and dispatch areas may need to be increased to meet the requirements.
4. CAT should devote additional resources to eliminate the regular and ongoing level of trip request denials.
5. Given the wide gap between Links ridership and the ridership predicted by the TCRP model, CAT should be prepared to devote significantly more resources to its ADA paratransit service. Beyond the eliminating the denials of the existing level of Links service, CAT may potentially have to increase its fleet, drivers, office staff, and associated resources by a factor of two. CAT should continue to work with its existing taxi contractor as well as seek additional contractors that may provide capacity for paratransit service.

Attachment A

CAT Response to Draft Report



Central Arkansas Transit Authority

901 Maple Street • North Little Rock, Arkansas 72114 • Ph 501-375-6717 Fax 501-375-6812

November 1, 2011

Mr. Aaron Meyers
Equal Opportunity Specialist
U. S. DOT
Federal Transit Administration
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Mr. Meyers:

As requested, listed below are corrections and updates to the draft report:

3.1 Description of Fixed Route Service

2010 NTD, CAT provided 2,369,500 trips. CATA expenditures, according to 2010 NTD Fact Sheet, \$13,820,259

CAT uses a fleet of 59 buses (47 in peak-hour service). All buses are low-floor.

3.2 Description of ADA Complementary Paratransit Service

Days and Hours of Service (pg. 9) CAT website information on service hours is consistent with hours provided. Little Rock and North Little Rock service is now provided during the same hours, eliminating need for differing service schedules.

Eligibility Determination (pg. 9). In addition to the Director of the Arkansas Disability Coalition, the Director of Vocational Services for Lions World Services for the Blind assists with eligibility determination and provides mobility training when needed.

3.3 ADA Complementary Paratransit Performance Policies and Standards

CAT operates 22 vehicles with a peak pullout requirement of 20 vehicles. Two additional vehicles will be added in 2012.

4.2 ADA Complementary Paratransit Eligibility Process

Lions World Services for the Blind has been working for a few weeks to format CATA bus schedules for Braille printing and has agreed to produce schedules for CAT.

To the best of my knowledge and that of the Director of Transportation, no Links driver has ever been authorized to charge a fare to persons using Links for the trip to obtain their ID card, nor has a violation ever been reported to me or the Director of Transportation by a customer or Links staff member.

10.2 Vehicle Fleet

CAT operates 22 vehicles, model years 2008 and 2009. Average fleet age of 2.32 years. Average mileage, 89,568. Fleet will be expanded by 2 vehicles in 2012, bringing total to 24.

10.5 Planning, Budgeting and Funding, Table 10.1 2010 ADA Passenger Trips, 65,619.

Future Plans, (pg. 69) 2011: Hired two paratransit drivers, bringing total to 24. Began a working agreement with Lions World Services staff, in addition to the established agreement with Arkansas Disability Coalition, for eligibility determination and mobility training.

2012: Expanding fleet with addition of two vehicles.

2011-2012: Ken Hosen, a principal in KFH, a transit consulting firm, and his staff are under contract with CAT to perform a comprehensive operational analysis of both bus and paratransit service. Mr. Hosen and his staff began in mid-October and the study is expected to be completed in six months. His roots are in paratransit and his experience will be invaluable to CAT as we work toward full compliance.

2012: CAT's administration building at 901 Maple in North Little Rock will be expanded to add space for the paratransit operation and a training room for paratransit and fixed-route operators. The paratransit coordinator, two schedulers and dispatcher now work out of one small room with no space to add staff. The new space will have a separate entrance for paratransit customers and staff, and will be able to accommodate staff additions.

Please let me know if you have questions.

Sincerely,



Betty Wirfeland
Executive Director

Copy: Ms. Monica McCallum

From: [Betty Wineland](#)
To: [Meyers, Aaron \(FTA\)](#)
Subject: Correction
Date: Friday, November 11, 2011 5:14:22 PM

Aaron, I learned this week that I erred in telling you that CATA has never charged a fare for the customer's trip to get their photo-ID card. At the time of the review customers were being charged a fare and this was not an inaccurate statement in the report. A fare charge had never been authorized and it certainly wasn't done at the time we began our paratransit service. I have no idea when the misinformation became the rule. I have had a long talk with Murray Gillerson, our Director of Transportation and paratransit manager. He states that he was unaware of the violation and I believe this to be an accurate statement. Needless to say, it is now corrected and everyone at Links and CATA is aware of the regulation.

I apologize for my misstatement in the response to the draft review.

Betty

Attachment B

On-Site Schedule

**ADA Complementary Paratransit Compliance Assessment
Central Arkansas Transit Authority (CATA)
November 2 – November 5, 2009**

PROPOSED SCHEDULE

Time	Activity	Who	Where
Monday, November 2, 2009			
9:00 AM	Opening conference	FTA; CATA staff; All assessment team members	901 Maple St.
9:30 AM	Review paratransit service design, policies, standards, service statistics, and other information sent in advance.	All assessment team members, CATA Paratransit Manager and other appropriate staff	901 Maple St
10:30	Tour Facility	All assessment team members, CATA Paratransit Manager	901 Maple St.
11:00 AM	Review CATA complaints Review budget and resources Begin review of trip denials	David Chia Patti Monahan Tom Procopio	901 Maple St.
1:30 PM	Review eligibility process Begin travel time analysis Begin review of on-time performance	Patti Monahan Tom Procopio David Chia	901 Maple St
2:30 PM	Observe trip reservations process (using phone splitters if possible) Review telephone system and Call Center staffing	Tom Procopio Patti Monahan David Chia	901 Maple St
Tuesday, November 3, 2009			
8:00 AM	Observe reservations process (using phone splitters if possible) Continue travel time analysis	Patti Monahan/David Chia Procopio	901 Maple St
10:00 AM	Interview Scheduler Review service area, hours and fares Continue review of eligibility process and records	Tom Procopio David Chia Patti Monahan	901 Maple St
1:00 PM	Interview drivers Continue on-time performance analysis.	Patti Monahan/Tom Procopio Chia	901 Maple St
2:00 PM	Observe dispatch Begin review of telephone system and call center staffing Review pullout records	Tom Procopio David Chia Patti Monahan	901 Maple St
Wednesday, November 4, 2009			
8:00 AM	Observe dispatch, Continue review of eligibility process Continue on-time performance	Tom Procopio Patti Monahan David Chia	901 Maple St
10:00 AM	Continue travel time analysis Continue review of on-time performance Review driver training and turnover	Tom Procopio David Chia Patti Monahan	901 Maple St
1:00 PM	Interview drivers (if needed) Continue review of on-time performance Continue review of budget and resources	Tom Procopio David Chia Patti Monahan	901 Maple St
Thursday, November 5, 2009			
8:00 AM	Complete preliminary data analysis & review findings Prepare for closing meeting	All assessment team members	901 Maple St
2:00 PM	Closing Meeting	FTA; CATA staff; All assessment team members	901 Maple St

Attachment C

Links Paratransit Handbook



Customer Handbook

**Central Arkansas Transit Authority
901 Maple Street
North Little Rock, AR 72114**

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Introduction

LINKS is an origin to destination, shared-ride service that complements CATA's fixed-route bus service. This service is designed to meet the requirements of the Americans with Disabilities Act (ADA). The Paratransit Customer Handbook is designed to inform ADA paratransit eligible consumers about LINKS.

The ADA is a civil rights law, not a transportation law, or a social program law. The ADA clearly requires non-discriminatory access to fixed-route service, with complementary paratransit service acting as a "safety net" for people who cannot use the regular bus system. Under the ADA, complementary paratransit service is not intended to be a comprehensive transportation system for individuals with disabilities. In other words, the ADA does not attempt to meet all the transportation needs of people with disabilities. Instead, the ADA is intended simply to provide individuals with the same mass transit opportunities that everyone else gets. In fact, the paratransit system must be equivalent in service criteria to the fixed-route system. For example, the service area and days/hours of service for paratransit and fixed-route service must be comparable.

All CATA buses are equipped with wheelchair lifts, some with "kneeling" mechanisms, and other accessibility features. Many people who formerly used LINKS are now able to ride the fixed route buses.

This handbook includes, rules, regulations, and guidelines for use of the LINKS system, and will answer most questions about LINKS operation. All paratransit customers should review this handbook carefully and refer to it whenever questions arise. For additional information, you may write to LINKS at 901 Maple Street, North Little Rock, AR 72114 or call any time between 8:00 a.m. and 4:00 p.m. Monday through Friday (voice 375-9607 / TDD 375-9608) or E-mail us at www.cat.org.

LINKS PARATRANSIT SERVICE AREA

LINKS is a van service that is specially equipped with wheelchair lifts and other accessibility features that allow for maximum mobility for customers with disabilities, and operates on a demand-response basis for residents and visitors within 3/4 of a mile on each side of each CATA Fixed Route.

ELIGIBILITY FOR PARATRANSIT SERVICE

LINKS is available only to customers who meet the following criteria:

- Persons who are certified under the Americans with Disabilities Act (ADA) as having disabilities.
- Functional limitations prevent them from using the regular fixed-route buses.
- There is some part of the regular fixed-route system that they cannot use because of a disability.
- **Must live within the service area (3/4 of a mile either side of a CATA Fixed Route)**
- The destination must be within the service area

An individual is eligible if he or she has a permanent or temporary disability as described below.

Permanent Disabilities

CATEGORY 1

This category consists of persons who are unable to board, ride, or disembark from the bus even if they are able to get to the stop and the bus is accessible. Persons in this category include individuals with mental or visual impairments who cannot navigate the bus system. Examples of navigating the system include recognizing destinations and understanding the transfer process.

CATEGORY 2

This category consists of persons with specific impairment-related conditions, who cannot travel to a bus stop or from a bus stop to their final destination. The specific impairment-related condition must prevent the person from using regular, fixed-route transit. A person is eligible if traveling to and from a bus stop is impossible when architectural and/or environmental barriers are combined with the specific impairment-related condition.

Temporary Disabilities

Persons with temporary disabilities may be eligible for LINKS paratransit service. The standards for eligibility are the same as those for permanent disabilities. Persons with temporary disabilities who are eligible for service will be provided service only for the duration of their disability.

APPLICATIONS

All prospective users of the paratransit program must complete an application form to be eligible. Application forms may be faxed or mailed upon request by telephone (voice 375-9607 or TDD 378-0361) or by writing to LINKS Paratransit, Central Arkansas Transit Authority, 901 Maple St., North Little Rock, AR 72114.

A variety of formats are available, please specify the necessary format: Regular or large print, Braille, or computer disk. Assistance in completing applications will be provided upon request.

When you receive your application forms please complete all sections. **Incomplete applications will not be accepted for processing and will be returned to you for completion.** This will delay your being eligible for LINKS Paratransit service.

General Information:

The applicant must provide all requested information including identifying persons (if any) who assisted them with the application. All information given will be verified, and providing false or misleading information will result in denial/termination of service.

Professional Verification:

This part must be completed by a professional familiar with the applicant's disability. These professionals can be a physician, nurse, occupational or physical therapist, QMRP, QMHP, rehabilitation counselor, independent living specialist, etc. licensed by the State of Arkansas. Ask the professional to complete the medical section of the Certification of ADA Paratransit Eligibility and return it to you.

Return the completed application to: LINKS Paratransit, 901 Maple Street, North Little Rock, AR 72114

THE APPLICATION PROCESS:

Within twenty-one (21) days of receiving a completed application, LINKS will inform the applicant of the results of their eligibility determination. If an application is approved, the applicant will receive an approval letter and may obtain an ADA photo-identification card at the CATA/LINKS offices at 901 Maple in North Little Rock.

If the application for ADA Paratransit eligibility is denied, the applicant will receive a letter of denial with an explanation of reasons for the decision. This letter of denial will include instructions on filing an appeal.

If LINKS has not made a determination of eligibility within 21 days following the receipt of a completed application, the applicant will be treated as eligible and provided service until and unless the individual is determined to be ineligible for paratransit service.

APPEAL PROCESS

If the decision is made to deny eligibility, a Notice of Denial is sent to the applicant. This notice will include the reasons for denial and the procedures which may be used to appeal the decision. An individual who wishes to appeal a decision of eligibility has sixty (60) days from the date of notice in which to submit a written request to the Transportation Director. LINKS will respond within thirty (30) days from submission of the appeal. If LINKS has not made a decision within thirty (30) days after the hearing, temporary service will be provided. This temporary service will continue until a decision on the appeal is reached.

To appeal a decision of eligibility mail or fax requests to:

Transportation Director
Central Arkansas Transit Authority
901 Maple Street
North Little Rock, Arkansas 72114
Phone 375-6717
Fax # 375-6812

PHOTO-IDENTIFICATION CARDS

The photo-identification card allows an applicant to schedule rides with LINKS. Each rider is given a registration number that appears on the ID Card. In addition, the card must be presented to the driver along with your fare every time you board the vehicle. If you cannot produce your card you will not be allowed to board the van. The card can also be used as identification for paratransit service on other systems if you are traveling out of town. Paratransit identification cards are not transferable. LINKS customers who allow another person to use their card may be suspended from service.

The ID card will be wallet-sized, and will contain the following information:

1. Name of the eligible individual
2. Name of the transit provider (LINKS)
3. Expiration date

Your first photo ID will be provided at no charge and will allow you to ride CATA's fixed-route buses at the Discount Fare. Replacement cards are \$2:00 each.

RECERTIFICATION

ADA eligibility is reviewed at least every three (3) years. All LINKS Paratransit customers will be required to recertify at reasonable intervals. Recertification forms will be mailed well in advance in order to allow maximum time for processing. Please notify the LINKS office if there are significant changes in your physical condition that may affect your Trip Category status.

PLEASE NOTE: Service cannot be provided to persons whose eligibility has expired. If you wish your service to continue, please be sure to submit your recertification application as soon as possible.

OFFICE & SERVICE HOURS:

LINKS operates during the following hours:

Monday through Friday	5:30 a.m. - 9:15 p.m.
Saturday	5:30 a.m. - 7:30 p.m.
Sunday	8:00 a.m. - 5:15 p.m.

TELEPHONES ARE ANSWERED DURING THESE HOURS:

Monday through Friday	5:00 a.m. to 7:00 p.m.
Saturday	8:00 a.m. to 12:00 noon;
Sunday	Answering Machine

If calling before or after the hours above, please leave a message on the LINKS answering machine. The next Scheduler/Dispatcher on duty will answer your call.

SCHEDULING TRIPS

HOLIDAYS

There will be no LINKS service on the following holidays:

New Year's Day
Memorial Day
Fourth of July

Labor Day
Thanksgiving Day
Christmas Day

ADA TRIP ELIGIBILITY

The eligibility for each trip request is determined by the Scheduler/Dispatcher. Factors such as weather, terrain and site accessibility are considered. **Having a LINKS Photo-ID card does not guarantee that your trip is ADA Paratransit eligible.** Trips that can be served adequately by a CATA bus will be denied ADA Paratransit Eligible status. Paratransit service may still be offered, however, if space is available.

Conditional / Unconditional Eligibility

In all cases, eligibility will be determined to be either "conditional" or "unconditional." An individual with "conditional eligibility" is one who is approved for some trips or under certain conditions. An individual with "unconditional eligibility" is one who is approved for all trips.

NON-ADA ELIGIBILITY APPLICATION PROCESS

Non-ADA Paratransit Eligible service is available to persons who have been certified as disabled by the Social Security Administration, U. S. Veterans Administration, and Arkansas Enterprises for the Blind, World Services for the Blind, and Rehabilitation Services for the Deaf, or by Physician's

Statement. Persons who present a Medicare card and a form of photo-identification, and persons who are 65 years of age or older may also qualify for the Non-ADA Paratransit Eligible fare. PLEASE NOTE: Because of the large number of ADA-Paratransit Eligible Customer requests CATA receives, LINKS is often unable to serve Non-ADA eligible riders.

TRIP CATEGORIES

All ADA-Paratransit Eligible service is scheduled within the following two categories:

1. An ADA Paratransit Eligible rider whose trip is ADA Paratransit eligible and wholly within the ADA service area.
2. An ADA Paratransit Eligible rider whose trip is not ADA Paratransit Eligible for reasons which may include but are not limited to the following:
 - a) Origin and/or destination is outside the ADA service area;
 - b) Service can be provided by a fixed-route bus.

SERVICE PROCEDURES

Requesting Trips

There are no restrictions on trip purpose. All requests for trips are accepted on a first-come, first-served basis. According to the ADA, no trips can be given priority. Medical trips, work trips, and recreational trips are handled on an equal basis.

Whenever possible, reservations should be made at least 24 hours in advance. Reservations will be accepted for ADA Paratransit Eligible riders up to fourteen (14) days in advance of the time the service is needed. Non-ADA Eligible customers may make requests up to seven (7) days in advance. When scheduling a paratransit trip, the following information is

required:

- Name
- Pick-up date and time
- Pick-up address
- Destination address
- Number of guests (companions), if any
- Accompanying Personal Care Attendant (PCA), if applicable; and,
- Pick-up time for the return trip if desired.

LINKS provides "next-day service." This means that requests for service for a particular day may be made any time during the preceding day. When possible LINKS requests a minimum of two to three day notice be given for adequate scheduling of a trip. Customers may make ride reservations up to fourteen (14) days in advance. Limited "same-day" trips (on a space available basis only) may be scheduled through dispatch by calling 375-9607; TDD 378-0361.

A trip is defined as beginning with the pick-up location and ending at the destination location. No individual or agency can request trips for several riders at one time.

RESERVATIONS

All rides must be scheduled by calling the LINKS Scheduler/Dispatcher. The number to call is 375-9607 (TDD 378-0361. To help LINKS give you the best service and to reduce the possibility of errors, we ask that you make your own reservation requests and/or requests for changes, unless prevented from doing so by disability or by an emergency situation. The optimum time to call for reservations is between 9:00 a.m. and 5:00 p.m., Monday through Friday. However, all calls left on the answering machine will be returned as soon as possible.

Reservation Time-Frame

At the time a reservation is made, the rider will be given a 20 minute time-frame – 10 minutes before and 10 minutes after actual reservation time. For example: Pickup time is 9:15 a.m. This means that the rider must be present and ready by 9:05 a.m. and be prepared to wait for LINKS until 9:25 a.m. Your LINKS driver cannot wait for you past your designated pick-up time.

Request for Reservation Changes

If you place a request for a reservation and call at a later date requesting a change in pickup time(s), date, place of origin or destination, this will be considered a new reservation request and your original request will be cancelled.

SUBSCRIPTION SERVICE

If you require service on a regular basis to the same destination at the same time of day, you may place a request for subscription service. When a rider subscribes for service, his or her trip is scheduled automatically. Subscription customers need not call to schedule their trip, but must call after 4:00 p.m. the day before the ride to verify the pickup time. (Call between 8 a.m. and 12 noon on Saturday if the ride is scheduled for Sunday or Monday.) If the service is no longer needed, please call LINKS at least 24 hours in advance, when possible, to cancel your ride.

PLEASE NOTE: The provisions of the Americans with Disabilities Act limit the number of customers who may be scheduled for subscription service. Requests for subscription service status will be filled on a first-come first-served basis. No rider will be bumped less than four hours before his or her pickup time. Riders who discontinue LINKS service for a period of more than 14 calendar days will be removed from subscriber status and will be required to call for reservations as needed. Riders may reapply for subscription service and will be assigned on a

first-come first-served basis according to space availability. Subscription service is assigned only to riders who use the service at the same time of the week from the same point of origin to the same destination. Subscribers may request a change in service a maximum of three times per month and retain their subscriber status. Subscribers may request a temporary change, of not more than 14 days' duration, in reservation time and/or destination. A change of more than 14 calendar days' duration will require a new request to be submitted to the LINKS office. Subscribers who are suspended from use of LINKS service due to policy violations will forfeit their subscription service status. These riders may reapply when reinstated as a LINKS customer.

NO SHOW/CANCELLATION POLICY

In order to adequately provide service to all riders, it is very important that LINKS receive cancellations in advance. Riders are asked, when possible, to call at least 24 hours prior to the time service is needed. This allows reservations to be booked for others. The following No Show/Cancellation Policy has been developed to control excessive cancellations or failure to appear for the service that has been requested:

NO SHOW

If you have a reservation for transportation on LINKS and do not keep the appointment, this will be classified as a **No Show**. A doctor's appointment that runs over the expected pick-up time is not considered a No Show, provided the customer or doctor's office notifies LINKS.

Upon the third No Show in a six-month period, the customer will be suspended from use of the paratransit service for 30 days, beginning 10 days after Notice of Suspension is mailed.

SHORT-NOTICE CANCELLATION

A Short-Notice Cancellation is defined as providing fewer than four (4) hours' notice to LINKS that the requested service will not be needed. Upon the third Short-Notice Cancellation in a six-month period, the customer will be suspended from use of the paratransit service for 30 days, beginning 10 days after Notice of Suspension is mailed. After each violation, a warning notice/policy reminder will be sent to the customer, stating the number of No Shows and/or Short-notice Cancellations that have been accumulated. There may be times that circumstances prevented proper notification of a trip cancellation. In that case, he or she may appeal the determination in writing, within 10 days of receipt of notice of the violation, to LINKS Paratransit, Central Arkansas Transit Authority, 901 Maple, North Little Rock, AR 72114. Be very specific as to reason for cancellation. Customers who are suspended from use of paratransit service due to violation of the No Show or Short-Notice Cancellation policies as defined above may appeal the determination in writing, within 10 days of the date of notice of suspension, to LINKS Paratransit at the address listed above. LINKS will issue a decision in writing within 10 days from submissions of the appeal.

NOTE: An Operator cannot wait past the customer's designated pick-up-time. A longer wait causes other riders to be picked up later than their assigned times.

If a customer is waiting to be picked up at an accessible designated point where he or she may be contacted by LINKS and has waited 15 minutes past the reservation time-frame, he or she may leave without being penalized for a No Show.

PCA'S, COMPANIONS, VISITORS

Personal Care Attendant (PCA)

A Personal Care Attendant (PCA) is someone designated or employed specifically to assist the paratransit eligible individual

in meeting their needs. CATA recognizes that a PCA is a mobility aid to the eligible customer. The PCA must have the same trip origin and destination as the customer. In addition, CATA requires that space for the PCA must be reserved at the same time that the customer reserves their ride. No fare is required for a PCA. However, an approved LINKS rider who decides to act as a PCA for another LINKS rider must pay a fare. The customer may take along a companion in addition to the PCA. It should be remembered that a family member or friend is regarded as a companion accompanying the customer, and not as a PCA, unless the eligible customer regularly makes use of a PCA and the family member or friend is acting in that capacity. CATA may determine that a PCA or companion is required for persons who repeatedly become ill or suffer behavioral problems while riding in the LINKS vehicle.

Companions

Customers who are ADA Paratransit eligible will be allowed to travel with at least one companion (guest), such as a friend or relative. The fare for the companion will be the same as the fare for the ADA Paratransit eligible customer. Additional guests accompanying the customer will be allowed on a space available basis only. Please note that CATA requires that the LINKS customer reserve a space for the companion when the customer reserves their own ride. The companion must have the same trip origin and destination as the customer. An approved LINKS rider may not ride free as a PCA for another LINKS rider.

Visitors

LINKS will honor paratransit certifications from other transit systems. An individual from out of town requesting service must present proof of their certification. A letter stating paratransit eligibility is acceptable. Documentation must include the name of the eligible individual, the name of the certifying paratransit provider, the telephone number of the provider's paratransit coordinator, an expiration date (if any), and any conditions or

limitations on eligibility. If the individual has indicated the need for a Personal Care Attendant (PCA), this must be noted in the documentation. If the person does not have an identification card or other documentation from their local area, LINKS will require the person to provide the scheduler with documentation of their place of residence, and their disability if the disability is not apparent.

LINKS will not provide service to a visitor for more than twenty-one (21) days from the date of the visitor's first paratransit trip; visitors will be required to apply for LINKS in order to receive transportation beyond this twenty-one (21) day period. However, the twenty-one (21) days can be consecutive or divided over several shorter visits. A visitor who expects to be in the Little Rock/North Little Rock area for more than twenty-one (21) days should apply for a LINKS card as soon as possible after arriving in the area served by LINKS.

FARES AND PAYMENT POLICY

Every ADA paratransit certified customer is required to pay a fare for each one-way trip, payable with a personal check, ride tickets or in cash. LINKS tickets are available in books of ten LINKS one-ride Tickets and can be purchased from the driver or at the CATA/LINKS office at 901 Maple, North Little Rock. All fares are subject to change. Cash paying riders should have exact change. Please keep tickets and ticket books in a safe place. LINKS cannot replace or give credit for lost or stolen tickets and ticket books. LINKS Operators cannot accept cash gifts or tips from riders. The ID card must be presented to the driver along with your fare every time you board the vehicle.

Fares

The one-way fare is \$2.70

The round trip fare is \$5.40

The ten ride ticket book is \$25.00

Transporting Common Mobility Aids

All common mobility aids shall be transported and properly secured. A common mobility aid is any class of three- or four-wheeled device that is usable indoors and designed for and used by individuals with mobility impairments. It may be operated manually or powered. A common mobility aid does not exceed thirty (30) inches in width, forty-eight (48) inches in length, and does not weigh more than six hundred (600) pounds when occupied. Paratransit vehicles may not be able to accommodate mobility aids exceeding these standards. All wheelchair users must ride in designated securement areas only. Persons who are not wheelchair users, but use other mobility aids will be allowed to use the lift mechanism provided that the mobility aid can be physically accommodated by the vehicle.

Forward vs. Backward: For safety reasons, passengers using mobility aids are encouraged to back onto the lift when boarding; however, passengers are not required to do so.

- Non-ambulatory riders must be able to sit up without unusual restraints and must be in a common wheelchair. LINKS cannot transport any rider that is too ill to sit up and be secured in their seat, and/or nauseous, vomiting, or bleeding. The operator will notify the dispatcher of the rider's condition and then if necessary advise medical authorities of either the rider's need for medical attention or that they must remain at the medical unit until they are well enough to travel on the van.
- LINKS Operators are not permitted to assist with a wheelchair on unstable or unpaved surfaces, or to lift a passenger or a wheelchair at any time. Assistance will be provided on firm, stable surfaces such as asphalt, concrete or other all-weather material. Operators may not assist customers on loose gravel surfaces.

- Ramps must have the most gradual slope practicable. LINKS cannot risk injury to the rider or the Operator by providing assistance on steep or unstable ramps. The maximum running slope is 1:12. The maximum rise for any ramp is 30 inches and the minimum clear width of the ramp is 36 inches.
- LINKS Operators are not trained to provide mechanical assistance if a rider's wheelchair malfunctions. If the wheelchair is easier to move with the clutch disengaged, the rider should provide the Operator with that information as well as instructions for performing the disengagement. Operators are not permitted to assist with a malfunctioning wheelchair that is extremely heavy and/or difficult to maneuver. The rider should have available the name and telephone number of the repair person or other assistant to call in the event of breakdown. The Operator will radio dispatch to have the call placed for the rider.

Mobility Aid Securement

Mobility aids must be properly secured whenever possible. Operators will use their best efforts to correctly use the appropriate number of securement points. If the mobility device meets the ADA regulatory definition of a common wheelchair, service will not be denied because the mobility device cannot be secured to the operator's satisfaction, either due to the awkward position of the securement points or the design of the mobility device. The Operator will inform the passenger that the wheelchair cannot be secured properly and also notify Dispatch. Safety of all passengers is a primary concern.

SERVICE ANIMALS

Customers may travel with service animals trained to assist them. Service animals include dogs used by persons with vision or hearing impairments, as well as other animals that provide aid

to customers with mobility impairments. The customer must inform the scheduler that they are traveling with a service animal when they make their ride reservation. Pets cannot be carried on LINKS vehicles.

OTHER MEDICAL EQUIPMENT

Customers may also travel with portable oxygen or other equipment, provided that the equipment does not violate rules concerning transportation of hazardous materials.

ON-BOARD POLICIES

LINKS Paratransit strives to provide the most efficient and pleasant transportation possible. So that we may serve you more efficiently, we ask that you show your ADA Eligibility Card or Discount Count Fare Card to the Operator when you board and be sure to have the correct fare. When riding LINKS, please observe the following rules:

- Profanity or abusive language/conduct will not be permitted on the LINKS vans, or when communicating with LINKS dispatch or scheduler.
- Weapons of any type will not be allowed on the LINKS vans.
- Radio/tape/CD players must be equipped with headphones to be used on the LINKS vans.
- Eating, drinking, smoking or use of other tobacco products will not be allowed on the LINKS vans. (Medical exceptions may be made to the no eating rule, with appropriate documentation from a physician.)
- Remain seated while the vehicle is in motion.

Boarding and Exiting the Van: Operators shall position the vehicle to make boarding as easy as possible for everyone, and be available at the vehicle's door to provide assistance when boarding or de-boarding, as needed. All passengers must enter or leave the van at the curbside, even on one-way streets.

Passengers have the right to determine how they will board (i.e., which way they will face), and boarding direction.

Use of Lifts: Upon request, operators will allow passengers who do not use a mobility aid to use a vehicle's lift or ramp to enter or exit the vehicle.

Carrying Packages: Because LINKS provides transportation service only, LINKS Operators are not permitted to carry items for riders. For example: if you plan a trip to the grocery store, consider having a Personal Care Attendant accompany you, arrange to have a friend meet you upon your return trip, or purchase in amounts small enough to handle yourself. Excessive repetitive trips on and off the vehicle to load packages will not be permitted. Following this policy allows the Operator to move quickly from one appointment to the next, thus serving more riders during the workday.

Illegal or Disruptive Conduct: Service will be suspended or refused to customers who engage in violent, seriously disruptive or illegal conduct. The severity of the incident will determine whether an individual is suspended temporarily or permanently. For example, a person whose behavior threatens or has threatened the safety of LINKS Paratransit personnel or other customers may be refused service (permanent revocation of eligibility). An individual who contests a refusal of paratransit service may appeal the decision through the administrative appeal process.

Pick-up/Drop Off Policies: The following general policies apply:

- LINKS vehicles do not enter private driveways. Riders must be waiting at the sidewalk, or at another safe waiting area in front of, or as close as possible to, the entrance of the pick-up location.
- Operators will wait for a rider at the curb of a public street, in front of, or as close as possible to, the rider's residence, a building or other designated pick-up location.

- Alley pick-ups and drop-offs may be allowed when safe and accessible as determined by CATA.
- Upon request, the driver may provide assistance between the vehicle and the door, as long as the operator is able to keep the vehicle in sight.
- Time constraints limit the driver's ability to assist you beyond the front entrance of your destination. If your destination is a large building or expansive complex, it might be best to have a companion, or personal care attendant, accompany you to provide assistance after you arrive.
- **Drivers will not enter your home other than assisting you into or out of the door threshold.** If the operator feels there is an emergency, he or she will radio the Dispatcher for assistance.
- You must lock your own door when leaving, or have assistance from someone other than the vehicle driver to do this for you.
- For drop-offs, the operator will drop the rider off at the sidewalk, or another safe waiting area next to the curb or a public street in front of, or as close as possible to, the designated drop-off location.
- If a rider cannot be left unattended (as a result of his or her disability or impairment), a companion or personal care attendant is required to receive the passenger upon the vehicle's arrival.

MISCELLANEOUS POLICIES

- LINKS vans cannot enter areas where there are inadequate roadways, insufficient clearance or similar circumstances which may result in damage to the vehicle or personal injury.
- LINKS Operators are not permitted to enter a rider's home at any time.
- LINKS Operators cannot accept cash gifts or tips from

riders.

- Customers are asked to leash their dogs or otherwise confine them on the premises while being served by LINKS. LINKS reserves the right to refuse service to customers who do not choose to abide by this policy.

LOST ARTICLES

Articles found on LINKS vehicles will be reported immediately and turned into the LINKS office after the Operator's shift. Persons claiming lost items should identify the item to the LINKS Operator or call the LINKS office with a description of the item.

YOU ARE A VALUED CUSTOMER

Service is foremost in the minds of our Operators, Schedulers and Dispatchers. LINKS employees will always treat you with courtesy and respect. Our goal is to provide you with dependable service. We ask that you assist us by abiding by the rules and regulations contained in this document. Violation of LINKS policies may result in suspension of service.

We welcome your comments and suggestions. You may write to LINKS at 901 Maple, North Little Rock, AR 72114 or call any time between 8:00 a.m. and 5:00 p.m., Monday through Friday (voice 375-9607 or TDD 374-9608). Updated information may be found on our Internet site at www.cat.org.

DISCRIMINATION AND HARASSMENT PROHIBITED

LINKS Paratransit customers shall not engage in conduct that discriminates against someone or harasses someone because of that person's race, sex, color, religion, national origin, age, veteran's status, or any other status protected by state or federal law. Customers should be respectful of the rights of other customers and of the operator.

Sexual discrimination/harassment is defined as sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature by a LINKS customer. This includes telling "dirty jokes" and other conversations which might be considered offensive to the LINKS Operator and other riders who are in hearing range. Racial discrimination is defined as any derogatory acts, remarks, references to ethnic background or behavior toward other riders or the LINKS Operator which might have a discriminatory impact. Discriminatory conduct is also defined as the use of racial slurs and jokes because of someone's protected status. If you have any questions about these prohibitions, please contact the Transportation Director.

Attachment D

ADA Paratransit Certification Forms

LINKS CERTIFICATION FORM

The information obtained in this Americans with Disabilities Acts (ADA) certification process will only be used by Central Arkansas Transit Authority for the provision of transportation services. This information is kept confidential. You will be notified of the determination by mail within 21 days after we receive your completed application.

Mail completed application to:

Links Paratransit Service
901 Maple
North Little Rock, Arkansas 72114
Phone (501) 375-9607
TDD (501) 375-9608

PART I: TO BE COMPLETED BY APPLICANT (PLEASE PRINT OR TYPE)

Last Name	First Name	Middle Initial	
Street Address			
Apartment Name		Apartment Number	
City or Town	State	Zip	
Home Phone	Work Phone	Medicaid Number	Date of Birth

In what format would you prefer material on Links service?

☐ Braille ☐ Audio Tape ☐ Large Print ☐ Regular Print

Will a Personal Care Attendant be required to travel with you occasionally when utilizing Links?

☐ Yes ☐ No

If you use a wheelchair or scooter, does your residence have a wheelchair ramp which meets ADA standards?
(See page 7, Policies and Procedures for Customers)

☐ Yes ☐ No

Are you able to safely and effectively travel through crowded and/or complex facilities?

☐ Yes ☐ No

In Case of Emergency Notify:

Name	Relationship	Phone No.
Address		
City	State	Zip

I certify that the above statements are true and correct to the best of my knowledge. I understand that supplying false information can disqualify my application and/or subsequent registration.

Applicant's signature _____

Date _____

ACKNOWLEDGMENT OF POLICIES AND PROCEDURES

I have read the Links Policies and Procedures for Customers. If it is determined that I am eligible for paratransit service, I fully understand and agree to abide by these policies and procedures as set forth for Links Paratransit Service.

I understand that violations of the Policies and Procedures could result in a suspension of service.

Signed: _____ Date: _____

If this contract has been signed by someone other than the person requesting the service, that person shall accept responsibility by completing the following:

NAME: _____

ADDRESS: _____

CITY: _____ STATE _____ ZIP: _____

DAYTIME PHONE: _____ RELATIONSHIP TO RIDER: _____

SIGNED: _____ DATE: _____

PART II - TO BE COMPLETED BY HEALTH CARE PROVIDER

Please print or type. Must be completed in full for application to be processed.

Please Check One: Physician _____ Licensed Health Care Professional _____
Social Service Agency _____ Licensed Rehab Social Worker _____

Applicant's Name: _____

Medical diagnosis of condition causing disability: _____

1. Is the condition permanent? Yes _____ No _____ If no, expected duration ____/____/____

2. Does this disability prevent the applicant from using Central Arkansas Transit's fixed route services?

Yes _____ No _____ If yes, describe in detail: _____

3. Does applicant use any of the following aids for mobility? (Check all that apply)

Manual Wheelchair _____ Electric Wheelchair _____ Cane _____ Crutches _____
Powered Scooter _____ Personal Attendant _____ Walker _____ Service Animal _____

4. Can the applicant travel 200 feet without the assistance of another person? Yes _____ No _____

5. Can the applicant travel a 1/4 mile without the assistance of another person? Yes _____ No _____

6. Can the applicant climb three 12-inch steps without assistance? Yes _____ No _____

7. Can the applicant wait outside without support for ten minutes? Yes _____ No _____

8. Can the applicant stand 15 minutes without the assistance of another person? Yes _____ No _____

9. Is the applicant able to give address and phone numbers upon request? Yes _____ No _____

10. Is the applicant able to recognize a destination or landmark? Yes _____ No _____

11. Is the applicant able to deal with unexpected situations or changes in routine? Yes _____ No _____

12. Is the applicant able to ask for, understand and follow directions? Yes _____ No _____

13. Will extreme hot or cold weather conditions prevent the applicant from using fixed route service?

Yes _____ No _____ If yes, please explain completely: _____

If the person has a visual impairment:

Visual Acuity With Best Correction: Right Eye _____ Left Eye _____ Both Eyes _____

Visual Fields: Right Eye _____ Left Eye _____ Both Eyes _____

Please describe any other disability or effect that prevents applicant from using Central Arkansas Transit's fixed route service.

I have reviewed this application and based upon my professional knowledge of the applicant, I certify that the above statements are true and correct.

Name of Health Care Provider (Please Print) _____ Office Phone Number _____

Office Street Address _____ City _____ State _____ Zip _____

State License Number (Complete if applicable; must be current) _____

Signature _____ Date _____



October 1, 2009

Dear Ms. Smith:

Your application for Paratransit Eligibility under the American with Disabilities Act has been approved. You are eligible for Paratransit service on a **trip by trip basis**. For each trip requested from the LINKS Paratransit program, the following indicated condition(s) must be met:

1. You are unable to board or ride or disembark from an accessible regular bus.
2. You are unable, due to impairment-related conditions, to get to your bus stop or wait for a bus.
3. **Your trip must be wholly within the ADA service area.**

Your conditions are (2) and (3) (conditional). ADA Paratransit Eligibility is subject to review by Central Arkansas Transit from time to time.

By receiving this eligibility, your trip request will receive priority over other trip requests if made on a timely basis. Also, when making an eligible trip, you will be charged no more than twice the regular bus fare. Currently, your ADA fare will be \$2.70 for each one-way trip.

Please come to Links Paratransit 901 Maple Street, North Little Rock to have a photo ID made within the next 30 days. Links will not be able to accept a request for service other than to and from the photo session until you have your photo made. Photos are taken at LINKS between the hours of 9:00AM and 4:00PM, Monday through Friday. Please bring this letter with you. If you have any questions, or need information on how to schedule your photo session, please contact LINKS at 375-9607.

Sincerely,

Murray Gillerson
Director of Transportation



October 21, 2009

Dear Ms. Smith:

Thank you for filling out the forms for the Links Paratransit Service. Unfortunately, your forms are incomplete and are being returned to you for your health care provider to complete. Please have the highlighted area completed and return the forms to me as soon as possible. Thank you for your assistance on this matter. If you have any questions please call me at 375-6717.

Sincerely,

Murray Gillerson
Director of Transportation



October 21, 2009

Dear Mr. Smith:

We reviewed your application and your address is outside of the service area. We regret to inform you that we will not be able to provide transportation services to you. We are required under the Americans with Disabilities Act to provide paratransit service to eligible persons living within 3/4 mile either side of a regular bus route (Express service is excluded from this requirement). At this time we do not have adequate funding to increase our service area.

If you disagree with this ruling you may appeal this decision by writing:

Betty Wineland
Executive Director
Central Arkansas Transit Authority
901 Maple Street
North Little Rock, Arkansas 72114
Phone 375-6717
Fax 375-6812

Sincerely,

Murray Gillerson
Transportation Director



October 21, 2009

Dear Ms. Smith:

Your **recertification application** for Paratransit Eligibility under the Americans with Disabilities Act has been approved for an additional 3 years. You are eligible for Paratransit service on a trip by trip basis. For each trip requested from the LINKS Paratransit program, at least one of the following indicated condition (s) must be met:

- You are unable to board or ride or disembark from an accessible regular bus.
- You are able to use an accessible bus, but an accessible bus is not available on that route.
- You are unable, due to impairment-related conditions, to get to your bus stop or wait for a bus.
- Your trip must be wholly within the ADA service area.

Your eligibility is based on conditions & (conditional.) ADA Paratransit Eligibility is subject to review by Central Arkansas Transit from time to time. Your trip must be wholly inside the ADA service area. Your ADA fare will be \$2.70 for each one-way trip.

Place the enclosed sticker directly on your photo ID in the lower right corner. The area designated for conditions. If you have any questions please contact Links at 375-9607.

Sincerely,

Murray Gillerson
Transportation Director



October 21, 2009

Dear Ms. Smith:

We have reviewed your ADA application and find that you do not meet the conditions for ADA Paratransit Eligibility. Based on the information provided your disability does not prevent you from riding fixed route buses. Therefore, your application is denied. If you disagree with this ruling you may appeal this decision by writing:

**Betty Wineland, Executive Director
Central Arkansas Transit Authority
901 Maple Street
North Little Rock, Arkansas 72114
Phone #375-6717
Fax #375-6812**

Sincerely,

**Murray Gillerson
Transportation Director**

Attachment E

Letter from CAT Stating Goal for Eliminating Trip Denials



September 28, 2009

Mr. Tom Procopio
TranSystems Corporation
38 Chauncy Street, Suite 200
Boston, Maine 02111

Dear Mr. Procopio:

In response to the letter and request from Ms. Cheryl L. Hershey, I am providing you with the following information.

1. Central Arkansas Transit Authority (CATA) is governed by a 12-member board appointed by local elected officials and serves the jurisdictions of Little Rock, North Little Rock, Maumelle, Sherwood and portions of Pulaski County. CATA directly operates all fixed route buses, streetcars, and paratransit vehicles. The service-area population is approximately 186,000. CATA operates a network of 20 fixed routes and 4 express routes. Service is provided from 5:30 a.m. to 9:15 p.m. on weekdays, 5:30 a.m. to 7:30 p.m. on Saturdays, and 8:00 a.m. to 5:15 p.m. on Sundays.

- The ADA complementary paratransit service, LINKS, operates a fleet of 19 vehicles during the same hours of service as provided by fixed-route buses. LINKS is housed at the CATA headquarters at 901 Maple, North Little Rock, AR 72114. All trip requests, reservations, scheduling and dispatching are handled from the LINKS office located within the central office.

CATA applied earlier this year for an earmark with which to expand its existing facility to add more space for paratransit and a larger, better-equipped space for training of fixed-route and paratransit operators.

The basic adult one-way fixed-route bus fare is \$1.35. A reduced bus fare of 65 cents is offered to persons 65 years of age and over, persons with disabilities, and Medicare Card holders during all hours of service. The fare for ADA complementary paratransit service is \$2.70 per one-way trip.

- All requests for trips are scheduled on a first-come, first-served basis. There are no restrictions on trip purpose.

2. CATA/LINKS does not contract with brokers or carriers.
3. Enclosed are copies of the LINKS Paratransit "Operators Manual" and Customers Handbook.
4. ADA complementary paratransit service standards. At the time a reservation is made, the rider is given a 20 minute time-frame or pickup window – 10 minutes before and 10 minutes after actual reservation time.
 - On-time is defined as performed trips (pickup time within the pickup window). The goal is 100% on-time performance.
 - ♦ LINKS 3-year goal is to eliminate trip denials. Current standard is to hold to no more than two percent.
 - LINKS standard is to maintain travel time at 1 hour or less.
5. Telephone call-handling standards: The On Hold Standard, 1-3 minutes. The Call Answering Standard, within 2 minutes of first ring.
6. Enclosed
7. Enclosed
8. Enclosed
9. Enclosed

Please call me if you have questions.

Sincerely,

Murray Gillerson 
Director of Transportation & Paratransit Manager

Attachment F

TCRP Project B-28 Estimation of ADA Complementary Paratransit Demand

TCRP Project B-28 Estimation Tool for ADA Complementary Paratransit Demand		
	Input Values for CAT Links Service	
ADA service area population (2000 Census)	165,615	
Base fare for ADA paratransit (Dollars)	\$2.70	
Percent of applicants for ADA paratransit eligibility found conditionally eligible	14.0	
Conditional trip determination	0	
Percent of the population in the ADA service area in households with 1999-2000 income below the poverty line	12.1	
Effective on-time window for ADA paratransit (minutes)	20	
	Results	
Predicted Annual Ridership per Capita	0.63	
Predicted Annual Ridership	104,216	
Confidence Intervals for Mean Value for Systems with the Characteristics Entered		
	Trips per Capita	Annual Ridership
Upper 95% confidence limit	1.16	191,492
Upper 90% confidence limit	1.04	172,465
Lower 90% confidence limit	0.38	62,975
Lower 95% confidence limit	0.34	56,717
Links CY 2008 ridership		57,340