City and County of Honolulu
Department of Transportation Services (DTS)
Honolulu, HI

ADA Complementary Paratransit Service Compliance Review

January 25–28, 2010

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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Attachment A DTS Response to Draft Report; DTS September 29, 2010 Interim Update (*Update*);The set of 41 suggested questions (*The Handi-Van Application); Determination Form*
Attachment B On-Site Review Schedule
Attachment C Sample Letter Sent to Applicants determined Not Eligible and "Notice of Appeal" Form
Attachment D Selected Telephone Performance Reports
Attachment E Copies of Sample Trip-Time Matrices
Attachment F Examples of Overly Tight Schedules
Attachment G Ridership Estimates Based on National TCRP Demand Estimation Model

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 requires 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 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 the transit system's established standards or typical practices if standards do not exist. The examination of pattern or practice includes looking at service statistics and basic service records and operating documents, and observing aspects of service delivery and operations including dispatch, reservations and scheduling to determine whether records and documents appear to reflect true levels of service delivery. Comments are solicited from local disability organizations and customers. Technical assistance is provided to assist the transit agency in monitoring service for capacity constraints.

FTA conducted a review of ADA complementary paratransit service, TheHandi-Van (Handi-Van), provided by the Department of Transportation Services (DTS) of the City and County of Honolulu, Hawaii from January 25–28, 2010. Planners Collaborative, Inc. and TranSystems Corporation, both located in Boston, Massachusetts, conducted the review for the FTA. The review focused primarily on compliance of the complementary paratransit service with the DOT ADA regulations.

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 eligibility determinations are made consistent with regulatory criteria. Section 37.129(a) requires that ADA complementary paratransit be 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 full fixed route fare. 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. Because there are no other ADA complementary paratransit services on Oahu, coordination with other service providers is not included in this review

The review also examined compliance 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 complementary paratransit services in the area.

This report summarizes the observations and findings of the on-site review of DTS' 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 in the three regions—fixed route bus and ADA complementary paratransit service. Chapter 4 provides a summary of the findings that are also presented at the end of the remaining chapters. Chapter 5 includes observations and findings related to rider assistance policies, service area, 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. Additional observations are presented in Chapter 7 (Telephone Service), 8 (Reservations), 9 (Service Performance), and 10 (Resources). Recommendations for addressing some of the findings are also provided.

FTA provided DTS with a draft copy of the report for review and response. A copy of the correspondence received from DTS on September 11, 2012 documenting its response to the draft report, is included as Attachment A.

2 Overview

This review focused primarily on compliance with the DOT ADA requirement that ADA complementary paratransit be operated without capacity constraints. The regulations identify several possible types of capacity constraints. These include waiting lists for trips, limits on the number of trips provided, and patterns or practices that result in a significant number of trip denials missed trips, untimely pickups, or excessively long trips. Capacity constraints also include any operating policies or practices significantly limit the amount of service to persons who are eligible for ADA complementary paratransit.

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

- Trip denials and waiting lists for a trip
- Trip caps
- On-time performance
- Travel times

The review team also made observations and prepared findings related to five other sets of policies and practices that could limit 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
- Telephone capacity

The review also addresses scheduling, dispatching, and operation of service as potential causes of, or contributors to, capacity constraints. Similarly, the review includes an analysis of resources as a potential contributor to capacity constraints.

2.1 Pre-Review

FTA sent a notification letter to DTS Director Wayne Yoshioka on November 3, 2009, requesting dates for the review and information the review team needed that should be sent in advance. Based on the information received from DTS, the review team examined key service information prior to the on-site review. This information included:

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

At the request of FTA, DTS made additional information available for the on-site review. This information included:

- Copies of completed driver manifests for recent months

- Six months of service data, including the number of trips requested, scheduled, denied, or canceled, no-shows, missed trips, and trips provided
- Breakdown of trips requested, scheduled, and provided
- Detailed information about trips denied in the previous six months, including origin and destination information, day and time information, and customer information
- Detailed information about trips identified in the previous six months with excessively long travel times
- Telephone call management records
- Records of recent customer comments and complaints related to capacity issues including: trip denials, on-time performance, travel time, and telephone access

In addition to reviewing the above service data and information, the review team reviewed complaints forwarded to the FTA's Office of Civil Rights alleging violations of ADA requirements by DTS in the provision of ADA complementary paratransit service. Finally, the review included interviews with riders, disability advocates, and disability agency staff to obtain comments on their recent experiences with DTS' ADA complementary paratransit service.

2.2 On-Site Review

An on-site review of the ADA complementary paratransit service took place from January 25–28, 2010. The on-site review began with an opening conference, held at 9 a.m. on Monday, January 25 at the DTS offices at 650 South King Street in Honolulu. Attendees included:

- Wayne Yoshioka, Director, Department of Transportation Services DTS)
- James Burke, DTS, Public Transit Chief
- Eileen Mark, DTS, Paratransit Operations Branch Chief
- Scott Ishiyama, DTS, Planner, Public Transit Division
- Geri Ung, DTS, Planner, Paratransit Operations Branch
- Raynette Dang, DTS, Senior Clerk, Public Transit Division
- Roger Morton, Oahu Transit Services (OTS) President and General Manager
- Robert Yu, OTS, Senior Vice President and Deputy General Manager
- Randy Inaba, OTS, Vice President, Finance
- Patricia Nielsen, OTS Vice President, Paratransit
- John Black, OTS Director of Operations
- Susan Clark FTA Office of Civil Rights
- Russell Thatcher, TranSystems, Review Team Leader
- Patricia Monahan, TranSystems
- Bill Schwartz, Planners Collaborative

Ms. Clark opened the meeting by thanking DTS for opening its office and operations to the review. She stressed that the review team would make every effort to complete the review with a minimal level of disruption to the DTS operation. She invited DTS staff to contact her directly should they have any questions or concerns about the review. She also mentioned that the review

team had significant experience with ADA paratransit operations and encouraged DTS to take advantage of their knowledge for any technical assistance that might be helpful. She stated that she hoped the review would be beneficial to DTS and that FTA was available to provide technical assistance.

Russell Thatcher of TranSystems then presented the schedule for the on-site review including the parts of the operation that would be observed each day. A copy of the review schedule is provided in Attachment B.

Following the opening conference, the review team met with staff of DTS and its contractor Oahu Transit Services (OTS) to discuss the information sent in advance and the information and material that was available on site. Information about the design of the ADA complementary paratransit service was reviewed.

For the remainder of the morning on January 25, the review team discussed the process in place at DTS to record and respond to consumer comments. The review team also began gathering information about the process used by DTS to plan and budget for ADA complementary paratransit services. Finally, the review team gathered information needed to analyze compliance with the ADA complementary paratransit requirements related to service area, fares, days and hours of service, and rider-assistance policies.

In the early afternoon on Monday, the review team met with representatives of Citizens for a Fair ADA Ride (CFADAR), a rider group formed to provide comment to OTS on the service. The review team then toured the OTS Handi-Van call center at 811 Middle Street and then began observing the process used to take ADA complementary paratransit trip requests.

On Tuesday morning, the review team continued observations of the trip reservations and initial scheduling process at OTS. Review team members sat with selected reservationists, listened to calls from riders, and recorded observations on the handling of trip requests. Review team members met with the lead scheduler to discuss procedures used to develop final runs. OTS staff prepared several special data reports on on-time performance and travel times. The review team began examining completed driver manifests as a part of on-time performance verification. The review team also began the process of examining long paratransit trips and comparing on-board travel times with those on the fixed route service.

On Tuesday afternoon, the review team gathered information about call center staffing levels, the design of the telephone system, and telephone performance, and observed the dispatch area during the peak hours of operation. The review team examined driver and workforce records, training programs, and turnover rates and began interviewing drivers as they returned from morning runs.

On Wednesday, the review team met with the DTS staff that manages the ADA complementary paratransit eligibility-determination process and its contractor, Innovative Paradigms. This included a review of the process used to conduct interviews and in-person functional assessments. The review team began to examine fleet information, daily vehicle availability, and operating spare ratios, pullout records and run coverage.

The review team continued its examination of on-time performance and on-board travel times, no-show policies and information about the tabulation of rider no-shows and observed the dispatch area of the call center for a second time.

On Thursday, the review team tabulated the various data that had been gathered and prepared for the exit conference. The exit conference took place at 2 p.m. at the DTS office at 650 South King Street. DTS and OTS representatives attending were:

- Wayne Yoshioka, Director, Department of Transportation Services
- James Burke, DTS, Public Transit Chief
- Eileen Mark, DTS, Paratransit Operations Branch Chief
- Scott Ishiyama, DTS, Planner, Public Transit Division
- Geri Ung, DTS, Planner, Paratransit Operations Branch
- Raynette Dang, DTS, Senior Clerk, Public Transit Division
- Roger Morton, Oahu Transit Services (OTS) President and General Manager (DTS Contractor
- Robert Yu, OTS, Senior Vice President and Deputy General Manager
- Randy Inaba, OTS, OTS, Vice President, Finance
- Herb Barbosa, OTS, Vice President, Maintenance
- Patricia Nielsen, OTS Vice President, Paratransit,
- John Black, OTS, Director of Operations
- Phil Maguire, Innovative Paradigms (DTS Contractor)
- Susan Clark, FTA Office of Civil Rights (by telephone)
- Russell Thatcher, TranSystems, Review Team Leader
- Patricia Monahan, TranSystems
- Bill Schwartz, Planners Collaborative

Bill Schwartz, Russell Thatcher, and Patricia Monahan represented the review team. Susan Clark of FTA's Office of Civil Rights participated by telephone.

Ms. Clark began the exit conference by thanking DTS staff members for their cooperation and assistance with the review. She stated that a draft report would be prepared and forwarded to DTS for review and comment. Ms. Clark stated that once the draft was transmitted to DTS, it would be subject to release in response to Freedom of Information Act (FOIA) requests. DTS' comments on the draft would then be incorporated into the final report, and the final report would be posted on FTA's website. Ms. Clark advised DTS that it will be required to respond to the findings and not to the recommendations presented in the report. Recommendations will be offered as suggestions for addressing the findings and DTS may consider the recommendations in developing responses to the findings.

The review team also thanked the staff of DTS, OTS, and Innovative Paradigms for the cooperation they provided throughout the week. They then presented initial findings in each of the following areas:

- Service design (rider assistance policies, service area, response time, fares, trip purposes, days and hours, and coordination)
- Eligibility determinations
- Telephone access

- Handling of trip requests
- On-time performance
- Trip duration
- Resources (vehicles, personnel, and financial planning and budgeting)

Mr. Burke asked how long DTS would have to address the findings. Ms. Clark responded that FTA would look to DTS to propose reasonable timelines for implementation of corrective actions to resolve specific findings. Mr. Ishiyama asked if the review team had developed an estimate of how much additional capacity was needed to address the findings. Mr. Thatcher responded that the team did not develop an exact estimate, but that general information provided by schedulers suggested that 10–15 additional morning, midday and afternoon runs were needed now. There was also some further discussion and explanation of the travel time findings and the training of drivers by taxi subcontractors.

Mr. Yoshioka thanked FTA and the review team for conducting the review. He said he looked forward to working with FTA to continue to improve Handi-Van service.

3 Background

The Department of Transportation Services (DTS) oversees the planning and management of transportation services within the City and County of Honolulu. DTS has five divisions: Traffic Engineering, Transportation Planning, Traffic Signals and Technology, Public Transit, and Rapid Transit. Fixed route bus and ADA complementary paratransit services are the responsibility of the Public Transit Division.

The City and County of Honolulu encompass the entire island of Oahu, which is 277 square miles in area with a population of approximately 910,000 people. In addition to the City of Honolulu, other communities on the island served by DTS include Kailua, Kaneohe, Mililani, Pearl City, Waimalu, and Waipahu.

3.1 Description of Fixed Route Service (TheBus)

DTS provides several types of fixed route service, known as TheBus. These include express and rapid routes, urban and suburban trunk and feeder services, and local circulators. At the time of the review, 100 different fixed bus routes were in operation, providing approximately 236,000 weekday rides and operating 67,000 miles of service. Table 3.1 shows the number of routes by type, as well as the number of weekday riders, runs, hours and miles of services.

Table 3.1 – TheBus Daily Service Characteristics

Service Type	Routes	Daily Runs	Weekday Riders	Hours	Miles
Express	33	240	11,200	464.1	11,600
Rapid	4	399	32,000	581.9	9,000
Urban Trunk	11	1,301	102,500	1,611.9	16,000
Urban Feeder	11	510	11,600	291.1	3,600
Suburban Trunk	16	913	69,200	1,434.8	21,000
Suburban Feeder	7	185	1,500	81.3	1,500
Community Circulator	14	484	7,600	234.4	3,500
Community Access	4	54	400	50.1	800
Total	**100**	**4,086**	**236,000**	**4,749.6**	**67,000**

DTS contracted with Oahu Transit Service (OTS) for daily operation of TheBus. Fixed route service was operated with a fleet of 531 vehicles. All vehicles were accessible (lift or ramp equipped).

Hours of operation varied by route. A few routes operated 24 hours a day. Other routes typically operated from 5 a.m. to 1 a.m.

The base adult fare on all fixed route services was $2.25 at the time of the review, and was increased to $2.50 effective July 1, 2010. Public information stated that one free transfer was provided per fare paid. A discount ($1) fare was advertised for youth (ages 6–17), seniors (65 and older) and persons with disabilities who had a TheBus Disability Card or Medicare card. Children under 6 ride the bus free if accompanied by a fare-paying adult.

3.2 Description of ADA Complementary Paratransit Service

DTS ADA complementary paratransit service is known as TheHandi-Van (Handi-Van). Following is a summary of the service design and key service policies, based on information provided by DTS as well as information included in the Handi-Van *Rider's Guide* (revised October 2009) (*Rider's Guide*).

System Design

OTS operated Handi-Van under contract to DTS. OTS provided a turnkey operation that included reservations, scheduling, dispatching, and service delivery.

OTS is a private, non-profit corporation. DTS and OTS planned Handi-Van service and developed operating policies and procedures. The contract between DTS and OTS called for OTS to submit service budgets annually to DTS and for monthly operating payments to be made based on the approved budget. An annual management fee was also negotiated.

Type of Service

The *Rider's Guide* stated (Pages 2, 7, 25, 26, and 38) that the service was "curb-to-curb**."** Pages 25 and 26 stated:

> An Operator's responsibility for a customer begins at the curb where the trip begins, and ends at the curb of the customer's destination. This means that Operators will assist you on and off the van only. You must make your own arrangements for any special assistance getting to and from your pickup point. Handi-Van does not provide custodian care.

The *Rider's Guide* (Page 38) stated: "Operators are not allowed to assist passengers from the door of their point of origin or to the entry of their destination."

At the time of the review, there was no indication in the public information or in any written policies and procedures that assistance beyond the curb is provided if needed. This policy does not meet the regulatory requirement for "origin-to-destination" service and is discussed in more detail in Chapter 5.

Service Area

The *Rider's Guide* (Page 12) stated that the service "is generally available throughout Oahu." The service description posted on the DTS website says the service "is generally available islandwide." DTS and OTS staff stated that service is not limited to corridors around fixed routes and is provided throughout the island in all areas which it is possible for vehicles to access.

Response Time

Handi-Van reservations were taken Monday–Sunday from 8 a.m. to 5 p.m. Reservations were accepted up to 7 days in advance.

The *Rider's Guide* (Page 16) stated that same-day service is provided when space is available.

Handi-Van Fares

The fare for Hand-Van service was $2.00 as described in the *Rider's Guide* (Page 6). This was below the fixed route base adult fare and met the requirement that ADA complementary

paratransit fares not exceed twice the base fixed route fares. The *Rider's Guide* (Page 14) states that personal care attendants (PCAs) ride free and page 28 notes that companions pay the same fare as the eligible rider. As detailed on page 14, fares can be paid in cash (exact fare only) or with coupons that can be purchased by mail or at TheBus pass office on Middle Street in Honolulu.

Days and Hours

Online information and the *Rider's Guide* (Page 12) stated that service is available "Mondays through Sundays, from approximately 5 a.m. through 1 a.m." Both sources of public information note that 24-hour service is available within 3/4 mile of TheBus Routes 2 and 40. The online information provides a link to a map of the Routes 2 and 40 corridors.

DTS and OTS staff stated that, aside from the identified 24-hour corridors, the hours of Handi-Van operation are not limited to the precise fixed route times in those corridors. Outside of the identified 24-hour corridors, Handi-Van service was operated from approximately 5 a.m. to 1 a.m.

Trip Purpose

The *Rider's Guide* (Page 19) stated: "All trips taken on Handi-Van are important. Priorities are never assigned based on the purpose of a rider's trip."

Eligibility

DTS contracted with Innovative Paradigms (IP) for its ADA complementary paratransit eligibility determination process. At the time of the review, all applicants participated in an in-person interview conducted by IP staff. Some applicants were asked to also complete functional assessments if an eligibility determination could not be made based on the interview. As discussed in greater detail in Chapter 6 of this report, individuals could bring verification of disability information with them to the interview. On an as-needed basis, IP contacted the applicants' named professionals for additional information.

DTS staff stated that the eligibility determination process was changed on October 14, 2009. Prior to that date, eligibility was determined based mainly on a paper application, with in-person interviews with functional assessments used on an as-needed basis.

PCAs and Companions

The *Rider's Guide* (Pages 28 and 29) detailed policies related to PCAs and companions. It stated that a PCA is always accommodated as long as the rider mentioned needing a PCA during the interview with the eligibility center. In addition, one companion is always accommodated and others are accommodated on a space-available basis. PCAs and companions are transported to and from the same origins and destinations as eligible riders.

Visitors

Visitors who provide documentation of eligibility from another system and visitors who claim a disability without documentation of eligibility from another system, receive 21 days of service per 365-day period. This policy was detailed in Handi-Van online information and in the *Rider's Guide* (Page 10).

3.3 ADA Complementary Paratransit Performance Policies and Standards

DTS provided the review team with advance information detailing its ADA complementary paratransit performance policies and standards. Some of this information was contained in a letter and attachments from DTS dated November 20, 2009. Additional information was contained in the Special Transit Services section of DTS' *Rules and Regulations*. Information regarding missed trips was found in the OTS *General Policies & Procedures* (*GP&P*) for Handi-Van service. The information below summarizes of the ADA complementary paratransit performance standards established by DTS for trip denials, vehicle wait time, late cancels and rider no-shows, missed trips, on-time performance, on-board travel times, and telephone service.

Trip Denials

DTS information provided in advance of the review stated that its goal is to have zero denials.

In addition to any outright inability to serve a next –day trip, at the time of the review DTS defined denials as any of the following:

- Riders were only offered pickup times more than an hour from their request , which were counted as a denial, regardless of or not the riders accepted them.
- Riders had to accept a pickup time that required them to leave earlier their origin earlier than they were able to leave (e.g., leave work early).
- Riders accepted a drop-off time that was later than their stated appointment times.
- Riders were only offered one leg of a round trip (in which case two denials were recorded).

Vehicle Wait Time, Late Cancellations, and No-Shows

The *Rider's Guide* (Page 22) stated that vehicles will wait a minimum of 5 minutes at pickup locations for riders to board. A late cancelation was defined as a cancellation made less than 2 hours before the scheduled pickup time. The *Rider's Guide* also stated that a late cancellation is treated as a type of no-show. Page 23 defined a no-show as a rider failing to take a scheduled trip without proper cancellation, or failure to board before the vehicle has waited the required 5 minutes. The *Rider's Guide* does not state that the vehicle must arrive within the pickup window and the rider can board anytime during the five minute minimum wait period. In addition, the policy does not distinguish between no-shows within the rider's control and those not under the rider's control. Vehicle wait time and no-show/late cancellation policies are discussed in Chapter 9 of this report.

The Special Transit Services section of DTS' *Rules and Regulations* (Page 13) stated:

> A cardholder who is a "No-Show" three or more times in a month may be subject to the suspension of special transit services to him/her at the discretion of the Director of the Department of Transportation Services Hearing Officer. The first such suspension of special transit service shall be for not longer than one (1) month. Suspensions for violations of this rule after the first suspension shall be for not more than six months.
>
> Prior to suspending service for any cardholder, the Director or his or her authorized representative shall send at least one (1) written notice warning the cardholder that a

subsequent failure of the cardholder to appear at the scheduled pickup time will result in suspension.

At the time of the review, DTS and OTS staff stated that the no-show suspension policy had not been enforced for the past three years.

Missed Trips

Section 9 of the OTS *GP&P* defined missed trips and how missed trips are to be coded. A missed trip occurs when:

- The vehicle arrives late and the trip is not taken. These are to be coded as "NM" trips ("Trip Not Made").
- The vehicle arrives late (after the 30-minute window) and the trip is taken. These are to be coded as "MT" trips ("Missed Trip But Transported").

The *GP&P* in use at the time of the review did not appear to set a percentage of missed trips that OTS should not exceed. Coding of missed trips is discussed in more detail in Chapter 9.

On-Time Performance

Based on information provided by DTS, the on-time performance window for pickups was from the scheduled pickup time to 30 minutes after the scheduled time (0/+30 window). Pickups made 31–60 minutes after the scheduled time were recorded as late trips. DTS staff stated during the review that their goal is for pickups to be on time or early at least 95 percent of the time.

At the time of the review, DTS had not established a formal standard or goal for on-time drop-offs. On-time performance standards and goals are discussed in more detail in Chapter 9.

On-Board Travel Time

Based on information provided by DTS, "trips of excessive duration" were defined as "trip lengths that exceed 1.5 times the ride time of an equivalent fixed route trip, including the estimated travel time to and from the bus stop." The travel time standard and goal are discussed in more detail in Chapter 9.

Telephone Service

Based on information provided by DTS, its telephone performance standard was that all calls be answered within 3 minutes that 80 percent of all calls be answered within 2 minutes and that no more than 10 percent of calls are abandoned.

3.4 Rider Comments

Formal ADA Complaints Received by FTA

At the time of the site visit, there was one formal complaint on file with FTA concerning ADA complementary paratransit services, identifying the following issues:

- Vans not showing up at all for scheduled pickups
- "Versa vans" (described as converted cargo vans) used for some trips
- Drivers are disrespectful and generally rude
- Driver sat on stepwell seats talking on radio and would not move to let rider out. Rider had to open emergency exit in rear to get out.

- Confusion at times over the agreed upon pickup location

Consumer Comments

Prior to the on-on-site review, the review team spoke with three riders by phone. While on-site, the review team met with representatives of CFADAR. The meeting was requested by CFADAR through the DTS Director who asked that the team attend. During the telephone contacts as well as the during the CFADAR meeting, the review team asked riders for comments on various aspects of the 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. The review team invited any other comments on the service not covered by the specific questions. Summaries of the comments received are provided in the appropriate sections throughout the report.

Consumer Comments on File at DTS

The review team examined a summary of complaints and commendations received by OTS from June 28, 2009–January 28, 2010. Of the 279 complaints and commendations received during the six-month period, 150 (54 percent) were specifically about Handi-Van service.

A breakdown of Handi-Van complaints by topic is shown in Table 3.2.

Table 3.2 – Complaints Received by OTS Regarding Handi-Van Service by Topic (June 28, 2009–January 28, 2010)

Complaint Topic	Number	Percent
Late pickup	22	15%
Taxi service	18	12%
Eligibility	12	8%
Vehicle no-show	6	4%
Unnecessary travel time	6	4%
Wrong drop-off location	5	3%
Wrong pickup location	4	3%
Pickup and Drop-off	3	2%
Other	74	50%
Total	**150**	**100%**

Approximately half of the complaints received were in the “Other” category. Late pickups and concerns about service provided by one of the two contracted taxi operators accounted for 15 and 12 percent of complaints, respectively. Approximately 8 percent of complaints dealt with eligibility-determination issues. Other topics made up between 2–4 percent of total complaints each.

The review team examined two types of complaint files maintained by OTS. The first type of file included complaint reports marked “completed” from the OTS Customer Service report system (described in more detail in Chapter 5) for December 2009 and January 2010. During that time, 17 completed reports were generated. Of those, 11 documented commendations and six documented complaints. Complaint topics included:

- Incorrect charging of customer no-show
- Observation of speeding

- Cab sent to provide trip had no space for the customer's PCA
- Vehicle parked at market with customers onboard and no operator in sight
- Rude driver
- Difficulty getting through to the reservations office on the phone

DTS referred Handi-Van service complaints received from the Honolulu City Council or Mayor's office to OTS. OTS tracked and logged these complaints. The review team analyzed files pertaining to complaints forwarded to OTS between October and December 2009. See Chapter 5 for more detail.

OTS recorded seven completed complaints and one commendation during that time. Topics included:

- Incorrect charging of customer no-show
- Van parked and running with the air conditioning on
- No follow-up with customer about a service complaint
- Need to transfer between vehicles
- PCA was asked to call back about pickup times and was told that no vehicle was available
- Rude reservationist and van not able to serve home location
- Customer dropped off at care center; operator would not go up driveway; handled customer roughly and she fell; customer believed driver had been drinking alcohol
- Van hit and damaged sign and the driver did not file an accident 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. At the time of the review, DTS provided only curb-to-curb service. Under § 37.129(a), paratransit service is required to provide service from origin to destination; in some cases where an individual's disability requires assistance beyond the curb, such assistance must be provided. Nine of the eleven drivers interviewed stated that they provided at least some service beyond the curb and some said they did so as long as they were able to keep their vehicles in sight. To meet the requirements of §37.129(a) of the DOT ADA regulations, DTS must revise its public information to inform applicants and eligible riders that assistance between the curb and the door of their point of origin or destination will be provided when needed due to disability, and how such assistance may be requested. The revised policy must take into account that an eligible rider's need for assistance may vary depending upon the location, particularly if it is one to which the rider has not traveled previously. DTS must ensure that personnel, contractors and subcontractors are trained to proficiency on this policy and provide copies of the revised policy and public information to FTA.
2. At the time of the review, fixed route service hours were daily between 5 a.m. and 1 a.m. for most bus routes with the exception of 24-hour service on Routes 2 and 40. Some bus routes (Routes 88A, 52, and 412) had time points on their schedules that were before 5 a.m. Service hours for Handi-Van were listed in the *Rider's Guide* as available from about 5 a.m. to 1 a.m. The *Rider's Guide* also stated that 24-hour service was available within 3/4-mile of Routes 2 and 40. To meet the requirements of §37.131(e) of the DOT ADA regulations, DTS must make Handi-Van service available throughout the same hours and days of fixed route service and direct reservations to accept these trip requests. DTS must ensure that eligible riders are made aware of the change, direct contractor(s) to adjust the scheduling software to recognize these trips and ensure that contractor(s) have vehicles and drivers available to provide these trips. As part of DTS' response to this finding, please provide a copy of the directive(s) and revised public information to FTA.
3. At the time of the review, DTS and its contractor, Oahu Transit Services (OTS), recorded much information about complaints in logs. Based on the information provided to FTA, however, it is unclear whether the records kept were sufficient to meet the requirements under § 27.121(b) that copies of complaints be kept on file for one year and that a summary of complaints be maintained on file for five years. Please provide information on DTS policies and procedures describing how these obligations are met.

4.2 ADA Complementary Paratransit Eligibility Process

1. To meet the requirements of §37.125(c) of the DOT ADA regulations, DTS must revise its public information to explicitly inform applicants and prospective applicants that if DTS has not made an eligibility determination within 21 calendar days, presumptive eligibility will be granted and service will be provided beginning on the 22nd day until DTS makes a determination. As part of DTS' response to this finding, FTA requests that DTS clarify when an application is considered complete, as the October 2009 eligibility process eliminated paper applications. It is unclear whether an application is considered complete when an applicant participates in the interview/assessment, or if, as described in Section 6.2 of this report, the IP Mobility Coordinator (MC) decides after the interview/assessment whether sufficient information has been gathered to make a determination. Secondly, FTA requests the current average number of days between a request for an appointment and the actual interview/assessment. Third, FTA requests that DTS describe the current maximum and average number of steps and days, beginning with an applicant's call for an interview/assessment, needed to complete the eligibility determination processes, for both new applicants and those applying for recertification. Finally, FTA requests that DTS specify the frequency of its review of IP's eligibility determinations.
2. At the time of the review, Innovative Paradigms (IP), DTS' contractor for eligibility determinations, was not recording or tracking milestones in the eligibility determination process. Developing a system for tracking milestones in the application process, including the dates that interviews/assessments are requested, offered and accepted and scheduled, dates that customers no-show for these appointments, and the date that the determination letter is mailed is essential for DTS to grant presumptive eligibility as required.
3. At the time of the review, when making final determinations, IP's Mobility Coordinators (MCs) overlooked or did not consider potential barriers related to street crossing, such as crossing wide streets and busy intersections and the functional walking speed necessary to accomplish these tasks, even though these factors were listed on the *Determination Form*, a thorough checklist of potential barriers that IP had developed for MCs to use when making final determinations. This observation was supported by the review team's analysis of a sample of determinations, as at least one condition was omitted in each of the four conditional determination decisions reviewed. DTS must direct IP MCs and Managers to consider all barriers to using fixed route service on IP's *Determination Form* when applicants are granted conditional eligibility, including walking speed and the ability to cross wide streets and busy intersections. Please provide a copy of the directive to FTA.
4. One of the 41 suggested questions that MCs used during the interview/assessment asked applicants to describe "any obstructions or barriers between your home and the closest TheBus stop that affects your ability to travel by yourself." To meet the requirements of §37.125 of the DOT ADA regulations, this question and public information containing this question must be revised to address travel to and from origins and destinations throughout the service area, rather than just soliciting information about potential barriers between applicants' homes and the closest bus stops. DTS must also ensure that eligibility determinations are based on an individual's functional abilities to use fixed route service to travel between any origin and destination within the service area, rather than proximity to a particular bus stop. Not all trips than an applicant may make will begin at home, and

environmental conditions that may interact with a rider's disability to prevent use of the fixed route service (terrain and lack of curb ramps, for example) are not necessarily identical to those surrounding the stop that is closest to the individual's home. In addition to revising this question, DTS must also revise all public information containing this question, including online information entitled "What Information do I need at my In-Person Interview?" As part of DTS' response to this finding, please provide copies of the directive, revised public information and the revised set of suggested interview questions to FTA.

5. At the time of the review, the sample letters provided to the review team granting conditional or temporary eligibility did not contain information about the right to appeal the decision. To meet the requirements under §37.125 of the DOT ADA regulations, DTS must ensure that its eligibility determination letters granting temporary or conditional eligibility inform applicants of the right to appeal, since these determinations limit a rider's eligibility. DTS must inform similarly-situated riders who were not afforded their right to appeal that they may reapply for eligibility. DTS must direct IP to revise determination letters accordingly and provide examples of the revised letters and a copy of the directive to FTA. As part of DTS response to this finding, please submit an example of letters and/or other public information sent to these riders informing them of the right to reapply.
6. In one of the 16 cases examined by the review team, DTS granted eligibility only for return trips from dialysis treatment. This policy does not meet the requirements under § 37.131(d) of the DOT ADA regulations, which prohibits restrictions based on trip purpose. The review team discussed this issue with IP, and IP agreed to revise the determination letters accordingly. DTS must provide examples of the revised letters to FTA, and inform similarly-situated riders whose eligibility has been linked to trip purpose that they may reapply for eligibility. As part of DTS response to this finding, please submit an example of letters and/or other public information sent to these riders informing them of the right to reapply.

4.3 Telephone Access

1. At the time of the review, while DTS had set reasonable standards for telephone performance, OTS met the standard only for abandoned calls. Performance in the reservations and "HV Cancellation" call groups were well below the established standards with some calls on hold for more than 9 minutes. In addition use of averages as a performance standard can mask individual call times and periods of poor performance; it is possible to meet an average standard while still experiencing significantly longer hold times at specific times of day and/or on specific days of the week. To meet the requirements of §37.131(f) to operate Handi-Van service without any operational pattern or practice that significantly limits the availability of service, the maximum allowable hold time standard must be set to avoid significantly long hold times. Telephone hold times must be regularly tracked and monitored against this standard and staffing must be adjusted in the call groups to avoid a pattern or practice of significantly long hold times. Along with a revised performance standard, DTS must establish a policy or procedure to regularly monitor performance and must direct OTS to adjust staffing to meet the standards. As part of DTS' response to this finding, please provide to FTA a copy of DTS' revised telephone performance standard and its procedure for monitoring OTS' performance which also specifies the frequency of OTS' periodic reviews /evaluation of its own performance.

4.4 Trip Reservations and Scheduling

1. At the time of the review, DTS' contractor, Oahu Transit Service (OTS) was not properly recording trip denials, resulting in an undercount of denied trips. During the site visit, DTS and OTS staff acknowledged that Handi-Van denials were experienced. During the six months prior to the review, 78 trip denials were recorded. Four trips were denied outright and never scheduled. The remaining 74 denials were recorded due to pickups times being scheduled at times more than one hour before or after the times requested by riders. At the time of the site visit, the review team observed a total of 188 trip requests, three of which should have been recorded as denials due to riders accepting pickup times more than one hour from the time they requested. These three denials were not recorded as such by OTS personnel. To meet the response time requirements of §37.131(b), DTS must ensure that employees and contractors count and track as denials any outright inability to serve trip requests, including any trip which it cannot schedule within one hour before or after the eligible riders desired departure time (even if accepted by the rider). If only one leg of a round trip can be reserved and the rider declines the trip, it must be tracked as two denials. DTS must track and report this information to FTA. DTS must direct contractor(s) and subcontractors to re-train reservation agents to record trip denials, establish a procedure for reviewing reservation practices to ensure that these denials are properly recorded as denials, and provide a copy of the directive to FTA. As part of DTS' response to this finding, FTA requests the number of ADA paratransit trips requested, scheduled, provided, and denied for the past six months and DTS' short and long-range plans to eliminate all ADA trip denials.

2. At the time of the review, while trips booked for weekdays were left unscheduled in the system, callers were left with the understanding that the requested times would be honored. As discussed in Section 9 of this report, schedulers were instructed to call riders back if adjustments had to be made to the pickup times entered into the system. DTS must establish consistent policies to ensure that riders are actually called back and afforded the opportunity to negotiate pickup times prior to trips being scheduled. Given the large number of trips that were "unscheduled" going into the service day at the time of the review, FTA also requests additional information on the polices currently in place to ensure that schedulers do not change a rider's pickup time without their knowledge, and that any necessary changes are limited to within 60 minutes of the rider's originally-requested pickup time. In order to ensure that the list of unscheduled trips does not constitute a prohibited waiting list, we also request information on how DTS ensures that these trips are actually scheduled prior to the day of service.

4.5 Service Performance

1. At the time of the review, it appeared that DTS did not require OTS or subcontractors to regularly measure or report on-board travel time, and the extent to which DTS monitored performance of its contractors and subcontractors was unclear. Defining "trips of excessive duration" as "trip lengths that exceed 1.5 times the ride time of an equivalent fixed route trip,

including the estimated travel time to and from the bus stop" did not provide for comparable Handi-Van travel times for some trips. To meet the requirement of §37.131(f)(3)(i)(C), DTS must monitor contractor and subcontractor performance to ensure that Handi-Van service is provided without substantial numbers of trips with excessive trip length. A revised standard for on board travel time is needed, as is a plan for monitoring the on-board time that Handi-Van riders experience. Such a plan should include requiring employees and contractors to collect, measure, and report accurate data regarding on-board time. As part of DTS' response to this finding, please provide the requested information and revised performance standard to FTA.

2. At the time of the review, it appeared that DTS did not require OTS or subcontractors to regularly measure or report on time performance, and the frequency with which DTS monitored on-time performance of Handi-Van service was unclear. The computed average on-time performance for DTS ADA paratransit service for the six-month period prior to the review was 85.6 percent, well below the DTS standard. For the sample day, DTS was on time for only 52.0 percent of the sampled trips. (If trips with pickups that occurred prior to the start of the pickup window are included, this increases to 96.7 percent; however, passengers cannot be compelled to begin their trips early and on-time performance should not be dependent upon a portion of substantially early pickups.) These on-time performance levels suggest the existence of a capacity constraint in violation of §37.131(3)(i)(A). DTS must develop a plan to review operational practices and identify ways to increase on-time performance for Handi-Van pickups, and adjust the sampling methodology to accurately reflect actual performance and include trips provided by taxi subcontractors. As part of DTS' response to this finding, FTA requests DTS' performance standards for its current contractors and subcontractors.

3. At the time of the review, DTS did not have a standard or window for on-time drop-offs for Handi-Van service. Of the trips with appointment times, 23.6 percent of the drop-offs took place after the appointment time, of which 13.4 percent (12) drop-offs were more than 15 minutes late. This represents poor performance, as nearly a quarter of all trips with requested drop-offs were late, and one in seven was more than 15 minutes late. DTS has an implicit obligation to get riders to appointments on time (not late) and an explicit obligation to monitor performance to insure that Handi-Van service is operated without any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons. Operational practices that cause riders to arrive late to appointments may discourage riders from using the service, which would constitute a capacity constraint prohibited by the DOT ADA regulations. DTS must develop an on-time standard or window for on time drop-offs to appointments; require contractors and subcontractors to track, measure review and report drop-off performance for all trips with a requested appointment time; and require contractors and subcontractors) to print the appointment times on driver manifests for all trips with a requested appointment time. As part of DTS' response to this finding, please provide copies of these standards and directives to FTA.

4. At the time of the review, DTS' no-show policy did not appear to make distinctions between no-shows that are within a rider's control, those due to circumstances beyond the rider's control, and those due to system error. DTS must revise the no-show suspension policy to include the following:

- The wait time must not begin before the beginning of the pickup window provided to the rider. If a vehicle arrives early, the wait time must begin at the start of the pickup window, not at the time of the vehicle's arrival. If the vehicle arrives before or after the pickup window, the rider is under no obligation to board early or wait for a vehicle that is late.
- No-shows that are not within the customer's control will not be counted against the rider.
- The advance notice of the proposed suspension must be provided in writing and the number of days of advance-notice must be reasonable and must be specified.
- Riders' frequency of use must be taken into account, to ensure that sanctions are imposed only for a pattern or practice of missing scheduled trips and not isolated accidental or singular incidents. Three no-shows in a 30-day period does not constitute a pattern or practice of missing scheduled trips.
- The length of the first and subsequent suspensions must be revised, as "not longer than one (1) month" and "not more than six months," respectively, are unreasonably long.
- The phrase "At the discretion of the Director of the Department of Transportation Services Hearing Officer" must be explained.
- Trips classified as a "missed trip and transported" will not be counted against the rider.

As part of DTS' response to this finding, please provide the requested information to FTA prior to making any revisions to the *Rider's Guide* and/or /the DTS *Rules and Regulations*. The policy must be revised to resolve this finding, even if DTS does not plan to reinstate the policy.

5. At the time of the review, DTS did not appear to have a written policy or procedure for employees, contractors and subcontractors to follow prior to declaring rider no-shows. Based on information the review team provided to FTA, the de facto procedure was for the driver to initiate a 5-minute countdown timer on the Mobile Data Terminal ("MDT") to indicate arrival at the pickup address. If the rider did not appear within 5 minutes, the driver was to report this failure to the dispatcher to obtain authorization to depart before leaving the pickup location. When alerted to possible no-shows, dispatchers were to double-check to make sure drivers had waited at least 5 minutes within the window. In practice, however, dispatchers stated that vehicle operators called in no-shows before they departed the pickup location about "about 95 percent of the time." Dispatchers stated that, if time permitted, they tried to call riders to alert them that the vehicle was waiting, and that "most of the time" they attempted to call riders. Approximately half of the no-shows analyzed by the review team were correctly coded; however, another 10 percent were incorrectly coded, and the remaining 40 percent lacked sufficient information to verify whether they had been correctly coded as no-shows. To meet the requirements of §37.125(h)(1) – (h)(3) of the DOT ADA regulations, a procedure for properly coding no-shows is required. Employees, contractors and subcontractors must be directed to code no-shows correctly and DTS must monitor and verify trip coding to ensure that proposed suspensions of service are warranted. As part of the response to this finding, please provide a copy of the procedure and the directive to FTA.

6. At the time of the review, there did not appear to be adequate procedures in place to verify that no-shows reported by taxi subcontractors were in fact no-shows. If a call was received from the subcontractor dispatcher at least 5 minutes after the scheduled pickup time, OTS agents appeared to assume that the vehicle arrived had arrived inside the pickup window and had waited the required 5 minutes. Based on observations at the time of the review, there was no attempt to verify that the vehicle was at the correct pickup location or locate the rider before the no-show was approved. As part of DTS' response to this finding, develop such a policy and provide a copy to FTA.

7. At the time of the review, DTS incorrectly defined a "missed trip" as either of the following:
   - The vehicle arrives late and the trip is not taken. These are coded as "NM" trips ("Trip Not Made").
   - The vehicle arrives late (after the 30-minute window) and the trip is taken. These are coded as "MT" trips ("Missed Trip But Transported").

   DTS must revise its definition of a missed trip to include any attempted pickup after the end of the pickup window that does not result in a passenger being transported, either due to the rider turning down or cancelling the trip, or the rider no longer being at the pickup location. If a vehicle does not arrive within the pickup window, the rider has no obligation to wait for the vehicle and is under no obligation to board the vehicle. If the rider elects to board a vehicle that arrives after the pickup window, that pickup must be counted as a late pickup. To meet the requirements of §37.125(h)(1)-(3) and §37.131(f)(3)(i)(B) of the DOT ADA regulations, DTS must operate Handi-Van without a substantial number of missed trips and must ensure that trips missed by DTS, OTS or subcontractors are not counted against the passenger. DTS must direct contractors and employees to code missed trips properly to ensure that riders are not experiencing a substantial number of trips missed due to transit system error and that such trips are not counted as no-shows against the rider. As part of DTS' response to this finding, please provide a copy of the directive to FTA. Please also report whether DTS has adopted a performance standard for missed trips that contractors and subcontractors are not to exceed.

8. To meet its obligations under §37.125(h)(3), DTS must establish an appeals process and make it available to an individual on whom sanctions have been proposed and submit the appeals policy to FTA. The policy must call for the sanction to be stayed pending the outcome of the appeal. The appeals process must meet the requirements of 37.125(g). As part of DTS' response to this finding, please provide the requested information to FTA.

4.6 Resources

There were no findings of non-compliance concerning resources. See Section 10.8 of this report for recommendations regarding resources.

5 ADA Complementary Paratransit Service Criteria

This chapter presents information about compliance of DTS' ADA complementary paratransit service policies with the DOT ADA regulatory criteria for:

- Type of service
- Service area and days and hours of operation
- Fares
- Trip purposes
- Coordination with adjoining transit systems (not applicable)

This chapter also examines the process used by DTS to receive, investigate, and respond to comments and complaints from ADA complementary paratransit riders.

5.1 Consumer Comments

Neither the riders contacted in advance nor those participating in the CFADAR meeting expressed concerns about the type of service, service area, days and hours of operation, fares, trip purposes, or trip reservations policies. The one formal ADA complaint on file with FTA also did not include these aspects of the service as issues.

One of the three riders contacted in advance of the on site visit expressed concern about the DTS complaint process. She stated that responses to complainants often did not indicate what had been done to address the issue. The lack of responses to complaints was also mentioned as an issue during the CFADAR meeting.

5.2 Type of Service

Section 37.129(a) of the DOT ADA regulations states that ADA complementary paratransit service must be provided on an "origin-to-destination" basis. Transit agencies may designate the "base" level of rider assistance that they provide as either curb-to-curb or door-to-door. According to DOT's interpretation of this provision, 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.

DTS policy as stated in the *Rider's Guide* (Pages 25-26) does not meet the requirements of the DOT ADA regulations at §37.129(a). The *Rider's Guide* stated:

> An Operator's responsibility for a customer begins at the curb where the trip begins, and ends at the curb of the customer's destination. This means that Operators will assist you on and off the van only. You must make your own arrangements for any special assistance getting to and from your pickup point. Handi-Van does not provide custodian care.

Interviews with several drivers at the time of the review indicated that the policy was not always followed explicitly. Nine of the 11 drivers interview reported that they assisted passengers who "clearly need help" with groceries, with making it to their door, and/or that they provided assistance to and from the door unless riders indicated that the assistance was not needed. Some

of the nine drivers stated that they did not assist passengers beyond the point that would prevent them from seeing their vehicle, but that they usually provided assistance. The other two said they only provided curb-to-curb service.

5.3 Service Area

Section 37.131(a)(1) of DOT ADA regulations requires a transit provider operating fixed route bus service to provide complementary paratransit service that covers, at a minimum, all areas 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 which are otherwise surrounded by served corridors. The service area for ADA complementary paratransit service must include areas outside of the defined fixed route jurisdiction—such as beyond political boundaries or taxing jurisdictions—that are within 3/4 mile of the transit operator's fixed route, unless the public transit agency does not have the legal authority to operate in those areas.

TheBus provides island-wide transit service throughout the island of Oahu. Fixed route service does not extend onto all roads.

The *Rider's Guide* (Page 12) stated that the service "is generally available throughout Oahu." The service description posted on the DTS website stated the service "is generally available islandwide." At the time of the review, DTS and OTS staff stated that service was not limited to corridors around fixed routes and was provided throughout the island in all areas which vehicles could access.

5.4 Days and Hours of Service

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

With the exception of 24-hour service on routes 2 and 40, service hours for TheBus at the time of the review were daily between 5 and 1 a.m. The *Rider's Guide* stated:

> All-day-all-night service (24 hours per day) was available in areas located within 3/4 of a mile of TheBus Routes 2 and 40 (from Makaha, along Farrington, Kamehameha and Nimitz Highways to Ala Moana Center; and from Liliha, along South King Street, Kuhio Avenue and Kalakaua Avenue to Kapiolani Park). Your Reservationist can tell you if the Handi-Van ride you need falls within an area that receives 24-hour service.

Routes 88A, 52, and 412 all had scheduled stops prior to 5 a.m. and after 1 a.m.

5.5 Fares

Section 37.131(c) of the DOT ADA regulations requires that 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. In addition, fares for individuals accompanying ADA complementary paratransit riders must be the same fare as for the paratransit rider. Personal Care Attendants (PCAs) must be allowed to travel at no charge. Finally, a transit system may negotiate a higher fare to a social service organization or other organization for trips which are guaranteed to the agency.

At the time of the review, the cash fare for a one-way trip on all DTS fixed routes was $2.25, and was as of July 1, 2010, the fare increased to $2.50. The ADA complementary paratransit fare was $2.00. Personal care attendants (PCAs) who accompanied a certified rider did not pay a fare and companions paid a $2.00 fare.

5.6 Trip Purpose

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

At the time of the review, DTS written policy did not prioritize provision of ADA paratransit service based on trip purpose. As discussed in Chapter Six of this report, during the review of the paratransit eligibility process, trip purpose issues were noticed and discussed with staff.

5.7 DTS Complaint Handling Process

The DOT ADA regulations require public transit providers to receive complaints from riders, resolve them promptly and equitably and to keep copies of complaints on file for one year and maintain a summary of complaints on file for five years (§§ 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 review team examined the DTS complaint process and the files obtained from the DTS Public Transit Division, Paratransit Operations Branch and the OTS customer service staff.

Complaint Policies and Procedures

Complaints and commendations about Handi-Van service could be submitted by phone, letter, or e-mail. The various procedures used to track and respond to complaints are described below.

Complaints initially received by the Honolulu City Council or the Mayor’s office were logged into the city’s complaint-tracking system and then forwarded to DTS. Complaints were logged again and referred to the Public Transit Division for investigation and resolution. The Chief of the Paratransit Operations Branch investigated the complaint and prepared a response letter for signature by either the Director of DTS or the Mayor. Responses were prepared within 14 calendar days of when the complaint was logged. If a time extension was needed to resolve the issue and the time extension was approved internally, an interim response was typically sent to the party filing the complaint.

When necessary, complaints, general questions, concerns, and explanations of policies and/or procedures were referred to OTS and logged by OTS. In those circumstances, OTS resolved the complaint or other issue directly with the customer. OTS' Vice President of Paratransit Services had to approve the complaint report and response, which were transmitted to the Head of the DTS Public Transit Division and the Chief of the Paratransit Operations Branch, who conducted follow-up if necessary. The Director of DTS co-signed the final complaint report.

If possible, OTS immediately handled those complaints and commendations which were filed directly with OTS via phone call or e-mail. When additional follow-up was necessary, OTS entered the complaint into the OTS Customer Service Report (CSR) system and referred the complaint to the manager or supervisor of the appropriate department for investigation and resolution. Managers and supervisors have 30 days to investigate a complaint and prepare a response. The Handi-Van Operations Manager reviewed and approves every response before it was finalized. The Customer Service staff phoned the customer with the approved response, finalized the complaint record in the CSR system, and printed and filed a copy of the CSR record.

Handi-Van Customer Service staff also tracked and responded to incident reports filed by drivers and tracked and respond to complaints about the service that were submitted via e-mail to TheBus website.

The CSR system tracked all dates of actions taken with regard to a complaint (as well as the identity of the staff member who made any changes to the complaint record. Processing times were monitored by Customer Service staff. OTS provided an annual report on complaint activity to DTS. No reports were generated throughout the course of the year.

Analysis of Complaint Response Times

The review team examined records of complaints received from the city in October and November 2009, from a log maintained by DTS for 2009 and files of completed complaint reports maintained by OTS.

The target response period at the time of the review was 14 days. The review team could not assess typical processing times, either because the OTS files did not include all of the complaints listed in the DTS log or because the dates that DTS referred complaints to OTS and OTS responses were missing or the information varied between the DTS log and the OTS complaint reports. It appeared that for approximately one-third of the complaints for which processing time could be determined, the customer received a response in 14 days from the date OTS received the complaint from DTS.

The target response period for complaints submitted directly to OTS was 30 days. The review team analyzed complaint files from December 2009 and January 2010 and determined the processing times. Eleven of the 18 reports in the files were commendations and one concerned a complaint about TheBus service. For the six complaints about Handi-Van service, all were addressed with a response to the customer within 30 days.

5.8 Findings

1. At the time of the review, DTS provided only curb-to-curb service. Under § 37.129(a), paratransit service is required to provide service from origin to destination; in some cases where an individual's disability requires assistance beyond the curb, such assistance must be provided. Nine of the eleven drivers interviewed stated that they provided at least some service beyond the curb and some said they did so as long as they were able to keep their vehicles in sight. To meet the requirements of §37.129(a) of the DOT ADA regulations, DTS must revise its public information to inform applicants and eligible riders that assistance between the curb and the door of their point of origin or destination will be provided when needed due to disability, and how such assistance may be requested. The revised policy must take into account that an eligible rider's need for assistance may vary depending upon the location, particularly if it is one to which the rider has not traveled previously. DTS must ensure that personnel, contractors and subcontractors are trained to proficiency on this policy and provide copies of the revised policy and public information to FTA.
2. At the time of the review, fixed route service hours were daily between 5 a.m. and 1 a.m. for most bus routes with the exception of 24-hour service on Routes 2 and 40. Some bus routes (Routes 88A, 52, and 412) had time points on their schedules that were before 5 a.m. Service hours for Handi-Van were listed in the *Rider's Guide* as available from about 5 a.m. to 1 a.m. The *Rider's Guide* also stated that 24-hour service was available within 3/4-mile of Routes 2 and 40. To meet the requirements of §37.131(e) of the DOT ADA regulations, DTS must make Handi-Van service available throughout the same hours and days of fixed route service and direct reservations to accept these trip requests. DTS must ensure that eligible riders are made aware of the change, direct contractor(s) to adjust the scheduling software to recognize these trips and ensure that contractor(s) have vehicles and drivers available to provide these trips. As part of DTS' response to this finding, please provide a copy of the directive(s) and revised public information to FTA.
3. At the time of the review, DTS and its contractor, Oahu Transit Services (OTS), recorded much information about complaints in logs. Based on the information provided to FTA, however, it is unclear whether the records kept were sufficient to meet the requirements under § 27.121(b) that copies of complaints be kept on file for one year and that a summary of complaints be maintained on file for five years. Please provide information on DTS policies and procedures describing how these obligations are met.

5.9 Recommendations

1. Consider ensuring that customers receive a response to complaints within 14 days for complaints filed with the City or within 30 days for complaints filed with OTS. Consider maintaining and directing OTS to maintain more complete and accurate logs of complaint receipt dates and key actions taken. To monitor the timeliness of responses, consider directing OTS to generate complaint activity reports periodically throughout the year rather than OTS providing only an annual report of actions taken on complaints.

6 ADA Complementary Paratransit Eligibility

Section 37.121 of the DOT ADA regulations requires transit systems to establish a process for determining ADA complementary paratransit eligibility including who is eligible, application timelines, recertification requirements, how appeals are handled, and how the process is described and made available in public information documents

The review team examined the process used 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 timeliness of the processing of requests for eligibility and carried out the following tasks:

- Obtained information about the eligibility determination process through interviews with riders and advocates and a review of consumer comments on file at DTS
- Developed an understanding of the handling and review of applications through an assessment of current eligibility materials and interviews of eligibility determination staff
- Review of application files of 23 recent applicants who had been granted conditional eligibility or who had been denied ADA complementary paratransit eligibility
- Reviewed the application files of applicants denied ADA complementary paratransit eligibility
- Reviewed no-show policy and procedures

6.1 Consumer Comments

The 14 riders who attended the CFADAR meeting stated that the outcomes of the October 2009 eligibility process "seemed fair." One person commented that she had heard that an applicant who was blind and used a dog guide had been denied due to staff misconceptions about the level of assistance provided by the dog. There were however, a number of comments about the new process and how it was planned and implemented:

- The implementation seemed rushed and not well planned
- Public information provided during the planning of the process was not clear and sometimes was conflicting
- Some riders were told that they could have either a Handi-Van ID card or a fixed route free fare ID, but not both
- Applicants who get private transportation to interviews have to pay to park at the facility where interviews are conducted
- Concerns about the privacy of disability information provided during the interview process
- Concerns about the qualifications of persons conducting interviews and assessments

Riders contacted by telephone in advance of the on-on-site review also stated that determinations seemed appropriate. One person expressed a concern about the qualifications of the staff conducting interviews and assessments.

No concerns were raised about the timeliness of eligibility determinations. CFADAR members and riders contacted by phone stated that determinations are usually made quickly—1 or 2 days.

Eligibility was not raised as an issue in the one formal ADA complaint on file at FTA.

A review of complaints received by DTS and OTS indicated some rider issues with eligibility. Twelve of the 150 complaints (8 percent) received from June 28, 2009–January 28, 2010 were about the eligibility process.

6.2 Overview of the Eligibility-Determination Process and Materials

Section 37.125(b) of the DOT ADA regulations requires that all information about the process, materials necessary to apply for eligibility, and notices and determinations concerning eligibility be available in accessible formats, upon request.

Section 137.125(c) of the DOT ADA regulations requires transit systems to make a determination of ADA complementary paratransit eligibility within 21 days of the receipt of a completed application, or treat the applicant as eligible and provide service until the eligibility determination has been made.

Section 37.125(d) of the DOT ADA regulations states 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 decision. 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. The specific reasons must relate to the regulatory criteria and the transit system's eligibility process. Decisions that deny or limit eligibility also must also include information about the process for appealing the decision.

Section 37.125(e) requires the transit system to provide documentation to each eligible individual stating that he or she is "ADA complementary paratransit eligible" and include the following information:

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

Section 37.125(f) permits the transit system to require recertification of the eligibility of ADA complementary paratransit eligible individuals at reasonable intervals.

Section 137.125(g) outlines a process for administering appeals through which individuals who are denied eligibility can obtain review of the denial. The transit system is permitted to require that an appeal be filed within 60 days of the denial of an individual's application. The appeal process must include an opportunity for the denied applicant to be heard and to present information and arguments. The decision on the appeal must be made by a person not involved with the initial decision to deny eligibility, must be written, and must explain the reasons for the decision. During the appeal period, the transit system is not required to provide paratransit service to the appellant. However, if a decision is not made within 30 days of the completion of

the appeal process, the appellant must be provided paratransit service from that time until and unless a decision to deny the appeal is issued.

At the time of the review, DTS required that all persons applying for ADA complementary paratransit eligibility participate in an in-person interview. Functional assessments are also conducted when needed. The 100 percent in-person process was implemented on October 14, 2009. Prior to that date, eligibility determinations were based largely on a paper application with in-person interviews and assessments conducted on an as-needed basis.

Innovative Paradigms (IP) oversaw the process under contract to DTS. IP took calls from individuals inquiring about eligibility, scheduled and conducted in-person interviews and assessments, made determinations, and sent out determination letters. DTS set policies related to the process, developed and disseminates public information about ADA complementary paratransit eligibility, oversaw the work of IP, and administered the appeal process for riders who did not agree with initial determinations.

Initial Determination Process

Section 37.123 of the DOT ADA regulations contains the regulatory eligibility standards for ADA complementary paratransit service, with further explanatory text provided in Appendix D to this section. As specified in §37.123(e)(1) & (2), eligibility is based on whether an individual can travel independently on the fixed-route system without the assistance of another person, other than the vehicle operator deploying the lift or ramp.

DTS had developed *TheHandi-Van Eligibility Information* (*Brochure/Flyer)* describing ADA complementary paratransit eligibility and the October 2009 determination process which eliminated paper applications. DTS had also developed a list of Frequently Asked Questions about the 2009 process, which was also posted on the website.

Individuals interested in applying for ADA complementary paratransit eligibility were instructed to call the Handi-Van Eligibility Center, located at 1100 Ward Avenue in downtown Honolulu. IP staff answered the telephone, responded to questions, and scheduled interviews. When arranging the interview, IP recorded applicants' general information (name, address, primary disability). If applicants were already Handi-Van riders, their eligibility status was verified. If eligibility was about to expire or might expire during the recertification process, IP staff extended eligibility for 30 days.

IP offered Handi-Van transportation the interview; the transportation was provided by OTS at no charge to applicants. At the end of each day, IP staff sent OTS a No Fare Report to ensure that the applicants traveling to and from the interview using Handi-Van were not charged a fare.

IP staff discussed the following information that applicants needed to bring to the interview, which was also included in the *Brochure/Flyer*:

- Applicant's contact phone numbers (home, cell, work)
- Applicant's complete street and mailing addresses
- Emergency contact names, relationships, and phone numbers
- Names, addresses, phone and fax numbers of health care providers that can be contacted if additional information is needed
- List of medications currently taken

- All mobility devices currently used
- Information about the make, manufacturer, and model of wheelchairs or scooters used
- Location of the bus stop closest to the applicant's home and the addresses of destinations to which they frequently travel
- List of barriers between the applicant's home and the nearest bus stop, such as hills, missing sidewalks, curb ramps, uneven surfaces, busy intersections

When applicants called IP to arrange an interview, IP told those who indicated they had a psychiatric disability that they should bring documentation of the disability from a health care provider. Applicants who indicated a vision disability were told that they should bring a visual acuity or field-of-vision statement from their vision care provider. The reason for encouraging these applicants to bring documentation is that it is important to know whether a psychiatric disability has been diagnosed and whether vision loss is at the level of legal blindness or greater, as this information cannot be determined in a physical functional assessment. However, the *Brochure/Flyer* does not state that the information is required. It advises applicants and prospective applicants that this information is optional. Applicants who indicated other disabilities were instructed that if they wished, they could bring supplemental information from a health care provider or disability services provider regarding their inability to use fixed route service.

At the time of the review, IP employed two Mobility Coordinators (MCs) who conducted the interviews and most of the in-person assessments. The two MCs at the time of the on-site review had experience working with persons with disabilities as counselors or as job trainers. Neither was a licensed Occupational Therapist (OT) or Physical Therapist (PT). IP stated that MCs completed an 80-hour training course that included instruction in the ADA regulations, eligibility policies and procedures, and the specific interview and assessment tools and protocols used.

At the time of the review, IP managers noted that they established the qualifications for MCs because MCs focused on making a "transportation decision" rather than a "medical decision." IP managers stated that if a determination required the skills of an OT or PT, IP had a contract with the Rehabilitation Hospital of the Pacific and would arrange for applicants to be evaluated by medical professionals at that agency. IP managers also mentioned that a similar arrangement with an Orientation and Mobility (O&M) Specialist who could evaluate applicants Evaluation by an OT, PT or and O & M Specialist, would require the applicant to make a second appointment. At the time of the review, IP stated that it had not needed to seek these additional assessments.

When applicants arrived at the Eligibility Center, their photos were taken. In the event the applicants were determined eligible, the photos were used to create their picture IDs. MCs conducted an interview and collected any additional documentation applicants brought with them. At the time of the review, IP had developed a set of 41 suggested questions that constituted the application (Attachment A). The questions addressed mobility issues for persons with various types of disabilities. MCs chose the pertinent questions among the 41 and asked them during the interview. MCs also collected general information (name, phone numbers, information on mobility aids, and need for information in accessible formats). Applicants were asked to sign a statement that the information provided was true and correct and that they agreed to notify Handi-Van if their condition or travel abilities changed.

Among the set of 41 suggested questions was one asking applicants to describe "any obstructions or barriers between your home and the closest TheBus stop that affects your ability to travel by yourself."

At the time of the review, the City and County of Honolulu provided free travel training to applicants for Handi-Van service. IP interviewed applicants to determine a range of mobility options, including paratransit service as well as travel training for fixed route service. The question regarding obstructions or barriers between home and bus stop was designed specifically to assist MCs in evaluating travel training options, not eligibility. This was explained that for purposes of eligibility determinations, obstacles and barriers system-wide (covering the island of Oahu) were considered.

This question must be revised to address travel to and from origins and destination throughout the service area, rather than just soliciting information about potential barriers between applicants' homes and the closest bus stops. Not all trips that the individual might wish to make begin at home, and the conditions around each fixed route stop (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 applicants provided all required information and documentation the interview phase of the process was considered complete. MCs next considered whether they had enough information to make an eligibility determination. If the MC still had questions about an applicant's eligibility, the MC conducted a physical functional assessment, a cognitive functional assessment, or both.

The physical functional assessment started with the MC conducting a Tinetti Balance and Gait test, as appropriate. The applicant and MC then left the eligibility center and walked a course established in the neighborhood around the Center. The course was appoximately a half-mile in length and included several controlled and uncontrolled street crossings, several inclines and declines and uneven and gravel surfaces. The course looped through the neighborhood so the applicant was never more than a block from the Center, in the event that the assessment needed to be terminated before the half-mile course was navigated. The MC recorded observations on a "Transit Skills Functional Assessment Form" while walking the course with the applicant. If the whole course was navigated, this physical functional assessment took approximately 30–35 minutes.

For applicants with cognitive disabilities, IP used the Easter Seals Project ACTION *Functional Assessment of Cognitive Transit Skills (FACTS) Assessment Tool*.

As mentioned above, IP also had contracts with a local rehabilitation hospital and with a local licensed O&M Specialist if more in-depth assessments by higher-level professionals are needed. Arranging these additional assessments, though, requires that applicants make a second appointment at the center.

If MCs still had questions after the physical or cognitive functional assessment they might contact one or more of the health care or service providers identified by applicants. Additional information about the disability or functional abilities might be requested. At the time of the review, determinations for applicants with psychiatric disabilities or seizure conditions were made based largely on information provided by applicants in the interview, documentation provided by applicants, and follow-up with named treating professionals, as information on

functional ability to use fixed route transit for those applicants with psychiatric disabilities or seizure conditions cannot be determined during a physical functional assessment.

IP had developed a *Determination Form*, which was a comprehensive checklist of tasks, skills, and barriers that MCs were required to consider all types of possible barriers fixed route travel before making a recommendation on an applicant's eligibility. MC were required specify, for each item on the *Determination Form* (Attachment A) whether they felt the applicant could perform the task, possessed the skill, or whether the applicant was affected by the barrier. At the time of the on-site review, since the process was still relatively new, the Manager of the Eligibility Center stated that she reviewed all files for completeness and consistency before making final determinations. If she had a question, she said she would consult with the MC who conducted the interview and assessment and would review the information in the file.

At the time of the review, IP sent out the determination letters on DTS' behalf.

DTS staff also stated that a streamlined eligibility process was sometimes used for certain emergency cases. These might include individuals who are needed transportation for life-sustaining medical treatment who needed service immediately. In these cases, DTS accepted documentation from treating medical providers and granted temporary presumptive eligibility until the individual went through the full determination process. DTS staff mentioned that this streamlined process had not been used very often. At the time of the review, 23 individuals using the service had been granted temporary presumptive eligibility (out of a total of 14,305 eligible riders).

Types of Eligibility Granted

Sections 37.127 (c) and (d) of the DOT ADA regulation requires that visitor eligibility be granted to individuals with disabilities who present documentation that they are ADA paratransit eligible in the jurisdiction in which they reside in addition to those who do not have documentation of being determined ADA paratransit eligible by another transit system. This section states that:

> With respect to visitors with disabilities who do not present such documentation, the public entity may require the documentation of the individual's place of residence and, if the individual's disability is not apparent, of his or her disability…The entity shall accept a certification by such individuals that they are unable to use the fixed route system.

Section 37.127(e) of the DOT ADA regulations requires that a public entity shall make the service to a visitor required by this section available for any combination of 21 days during any 365-day period beginning with the visitor's first use of the service during such 365-day period.

As Appendix D explains, an eligible rider does not need to live within an ADA service area in order to be eligible for service. Eligibility is based on an individual's functional ability to use fixed route service. If an eligible rider lives outside of the paratransit service area and can get to a pickup point within the service area, he or she must be provided with service from the pickup point to destinations within the service area.

At the time of the review, applicants for Handi-Van service could be determined eligible for unconditional paratransit eligibility, conditional paratransit eligibility, temporary paratransit eligibility, or they could be determined to be ineligible.

- **Unconditional eligibility** is granted if it is determined that applicants cannot use the fixed route service under any reasonable conditions.
- **Conditional eligibility** is granted if it is determined that applicants can use the fixed route service under certain conditions and need paratransit service for only some trips.
- **Temporary eligibility** can be either unconditional or conditional. Unconditional and conditional eligibility are granted for a period of four years. Temporary eligibility is granted if it is determined that the applicant's ability to use fixed route service is likely to change in the short term. For example, this might include a change in travel abilities due to planned or current treatments.

A review of determinations suggested that IP considered a broad range of barriers and that the applicants in the sample who were found to have conditional eligibility were provided with a detailed list of conditions that conferred eligibility. Types of barriers and conditions included in letters of determination reviewed were:

- Distances to or from bus stops
- Uneven (irregular) surfaces
- Steep street grades
- Busy intersections
- Travel at before sunrise or after sunset (darkness)
- Unfamiliar destinations
- Lack of sidewalks or lack of curb-ramps
- Trips that required a transfer
- Variable disability conditions (good day/bad day)
- Inaccessible bus stops
- Long standing/waiting times

Final Decisions and Letters of Determination

Sections 37.125 (d) and (e) of the DOT ADA regulations require that letters of determination include 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 PCA

This section also requires that determinations of eligibility are in writing and if applicants are found to be ineligible, the determination must state the specific reasons for the decision. Appendix D to the regulations explains that these reasons cannot be a simple recital that the person has been found to be able to use fixed route service. Decisions that deny or limit eligibility also must also include information about the process for appealing the decision.

IP staff made final determinations to grant unconditional, conditional, or temporary eligibility and sent out determination letters. IP also sent photo ID cards to approved applicants. DTS staff stated that DTS conducted regular reviews of the process to ensure that IP was following DTS established policies and procedures.

The review team analyzed a sample of the letters used by IP. The letters granting eligibility contained the information required by the DOT ADA regulations: name of transit agency, contact name and phone number, the applicant's name, any conditions of eligibility including use of a PCA, and an eligibility expiration date. The letters denying eligibility contained information about the right to appeal, an enclosure with details about the appeal process and a specific justification for the decision. A copy of a sample letter to an applicant found not eligible is provided as Attachment C.

Sample letters granting conditional or temporary eligibility did not contain information about the right to appeal. Since these determinations limit eligibility, appeal information must be included.

Recertification

At the time of the review, DTS granted full-term unconditional and conditional eligibility for 4 years. Temporary eligibility was granted either for the expected duration of the applicant's disability, or for a shorter time period if IP determined that the applicant's functional abilities might change in the short-term.

All Handi-Van riders received notices 90 days before the expiration of their eligibility reminding them to reapply. During review team observations of the trip-booking process at the time of the review, reservationists also reminded those riders whose expiration dates were approaching to reapply.

DTS authorized IP to extend the eligibility of riders if they reapplied late in their term of eligibility to ensure that eligibility did not lapse.

6.3 Reported Determination Outcomes

Statistics provided by DTS and IP during the on-site review indicated that 20,522 individuals have registered for Handi-Van service since its inception. As of January 1, 2010, there were 14,305 individuals in the system as current eligible riders. Table 6.1 shows the breakdown by types of eligibility for registered riders at the time of the review.

As of January 1, 2010, 39.4 percent of registered riders had unconditional eligibility. A relatively high percentage of registered riders (60.2 percent) had conditional eligibility. A relatively small percentage of registered riders ((0.1 percent) had been granted either conditional temporary or unconditional temporary eligibility. Twenty-three riders had presumptive eligibility for critical medical needs, and 24 riders had visitor eligibility.

Table 6.1 – Handi-Van Eligibility by Type for Riders Registered as of January 1, 2010

Eligibility Type	Riders	Percent of All Registered Riders
Unconditional	5,637	39.4%
Conditional	8,605	60.2%
Temporary Unconditional	11	0.08%
Temporary Conditional	5	0.03%

Presumptive	23	0.17%
Visitors	24	0.17%
Total	**14,305**	**100%**

To determine the typical volume of determinations and the number and percent of applicants found eligible and not eligible, the review team requested outcome data for January 1–October 12, 2009, the date of the system change. During this 42-week period, DTS received 4,863 applications. DTS made 4,692 determinations, with 171 applications returned as incomplete (3.5 percent). On average, DTS received 512 applications each month with approximately 494 determinations made. Eligibility was granted for 4,583 applicants (97.3 percent) while 109 applicants were determined not eligible (2.3 percent).

To compare outcomes for the new eligibility process to those from the prior one, data was also collected on interviews requested, interviews conducted, and determinations made from October 14, 2009–January 27, 2010. The data indicated that 1,036 individuals made appointments for interviews during this period (approximately 300 per month). Only 720 interviews were conducted.

From October 14, 2009–January 27, 2010, IP made 606 determinations, approximately 173 per month. This was an approximately 65 percent drop in the number of determinations compared to the data reported prior to the implementation of the new process. It appeared that fewer individuals were requesting consideration for Handi-Van eligibility. It appeared that others were initiating the process by calling for interview appointments, but were not following through on their requests.

Table 6.3 summarizes the outcomes for the 606 determinations made under the new system. The majority of applicants (62.9 percent) were granted unconditional eligibility. A third (33.2 percent) received conditional eligibility. Temporary eligibility was granted 2.3 percent of the time, and 1.6 percent of applicants were found to be not eligible.

Table 6.2 – Handi-Van Eligibility Outcomes October 14, 2009–January 27, 2010

Eligibility Type	Riders	Percent of All Registered Riders
Unconditional	381	62.9%
Conditional	201	33.2%
Temporary Unconditional	9	1.5%
Temporary Conditional	5	0.8%
Not Eligible	10	1.6%
Total	**606**	**100%**

These percentages under the October 2009 process do not appear to explain the significant decline in the number of applicants. Outcomes actually appear to be *less* strict. A higher percentage of applicants had been found unconditionally eligible under the October 2009 process while the percentage of those found conditionally eligible or temporarily eligible had declined. The number of applicants found not eligible had declined slightly and was still a relatively small percentage of the total.

The percentages under the 2009 process appeared to be similar to those reported by systems that are generally considered to have established similar in-person paratransit eligibility processes.

Conditional eligibility is typically reported to be 20–40 percent of total determinations and denials of eligibility are typically eight percent or less.

6.4 Process Observations and Reviews of Determinations

Review of Application Processing Times

Section 37.125(c) of the DOT ADA regulations requires public entities to make a determination of ADA paratransit eligibility within 21 days of the receipt of a completed application, or treat the applicant as eligible and provide service on the 22nd day and thereafter until the eligibility determination is made.

At the time of the review, DTS stated that it considered the application to be complete once the in-person interview had been conducted and the applicant had provided all required documentation. For applicants indicating a vision disability, this included providing visual-acuity statements or field-of-vision statements. For applicants indicating a psychiatric disability this included providing documentation of the disability from a treating professional or service provider.

The review team examined 23 randomly selected eligibility determination files to determine the time required to schedule interviews/assessments and make determinations. The files covered the period from October 14, 2009–January 27, 2010. Table 6.3 shows the results of this check of processing times.

Table 6.3 – Processing Times for 23 Randomly Selected Handi-Van Eligibility Determinations

Rider	Recert. Or New Applicant	Date of Call Requesting Interview	Date of Interview	Days to Schedule Interview	Date of Final Determination Letter	Days After Interview to Make Determination
1	New	10-20-09	11-12-09	23	11-16-09	4
2	New	10-22-09	11-4-09	12	11-19-09	15
3	Recert	10-23-09	12-3-09	11	12-14-09*	11
4	New	10-26-09	11-19-09	24	11-23-09	4
5	Recert	10-29-09	11-23-09	25	12-7-09*	14
6	Recert	11-2-09	12-4-09	2	12-4-09*	0
7	Recert	11-3-09	12-4-09	31	12-4-09*	0
8	Recert	11-3-09	12-2-09	29	12-7-09**	5
9	Recert	11-9-09	12-11-09	32	12-24-09**	13
10	Recert	11-10-09	12-29-09	49	12-31-09**	2
11	New	11-16-09	11-23-09	7	11-23-09	0
12	Recert	11-17-09	12-28-09	41	12-31-09*	3
13	Recert	11-19-09	12-24-09	35	1-14-10*	21
14	Recert	11-20-09	12-31-09	41	1-10-10*	10
15	Recert	11-24-09	1-6-10	13	1-6-10*	0

16	Recert	12-2-09	1-7-10	36	1-18-10*	11
17	Recert	12-2-09***	12-2-09	0	12-2-09	0
18	Recert	12-8-09	12-10-09	2	12-24-09	14
19	Recert	12-9-09	12-23-09	14	12-27-09*	4
20	New	12-9-09	12-15-09	6	12-28-09	13
21	New	12-10-09	12-11-09	1	12-23-09	12
22	New	12-21-09	12-23-09	2	12-31-09	8
23	New	12-21-09	1-25-10	35	1-27-10	2

* Applicant was current rider. Eligibility was extended at intake to ensure no lapse.
** Applicant was current rider. Check of eligibility status at intake showed adequate remaining time to cover determination process. No lapse of eligibility occurred.
*** Walk-in

In all 23 determinations, final letters were sent within 21 days of the dates of the interviews/ assessments. The elapsed time between interviews and final determinations ranged from zero to 21 days and averaged 7 days. IP staff stated that prior to early December 2009 there were some delays in scheduling interviews. The files examined prior to December 3, 2009, showed that interviews were scheduled in 2–49 days and the average time between calls and interviews was approximately 26 days. Since December 3, 2009, it took 1–35 days to schedule interviews; the average time for the sample of files examined was 10 days.

During the on-site review, the review team checked the availability of appointments to get a sense of the interview scheduling at the time of the review. On that day, appointment times were open and available in as few as two days out (January 29, 2010).

IP staff mentioned that in some cases, delays in scheduling interviews were likely the result of applicants not showing up for initial appointments or not being able to accept the earliest dates offered. At the time of the review, IP was not recording when this happened. It would be a good practice to document no-shows for interview appointments and whether initial interview offers are accepted.

As shown in Table 6.3, for each rider applying for recertification, IP routinely checked their eligibility status and extended eligibility if needed, to cover the time needed for the recertification process. In the sample reviewed, there did not appear to be any lapses in eligibility for registered riders; either riders had Either riders had enough time left in their term of eligibility to for the recertification process or IP extended the expiration date.

For new applicants in the random sample, all determinations were made within 21 days of the date of the interviews/assessments, but for three riders, it took some time to schedule and conduct an interview (Riders 1, 4 and 23 in Table 6.3). As mentioned above, this could have been due to applicant's no-showing or not accepting initial interview dates.

DTS gave applicants a general sense of how long it takes to make determinations but did not state in public information that service will be provided if the determination takes more than 21 days from the date of the interview/assessment. The *Brochure/Flyer* stated "Eligibility determinations normally will be made within 21 days of completion of the application process." It did not state that service would be provided if the decision took longer than 21 days.

To review the appropriateness of determinations, the review team analyzed several applications that were randomly pulled from the files. The sample included 16 applications from individuals who were found conditionally eligible and seven applicants found to be not eligible.

All seven determinations of ineligibility in the sample reviewed appeared appropriate. In five cases, applicants did not identify a disability, stated that they did not have any issues using TheBus and that that they were currently riding TheBus without limitations. In the other two cases, the information gathered in the interview process did not indicate impairments or disabilities that were significant enough to prevent use of TheBus.

In several cases for which applicants were found not eligible, including the two cases where some level of disability was indicated, outside functional assessments or professional verification were not conducted to support the information and observations from the interview. It is possible that the applicants agreed that they could use TheBus, but it appeared that it would have been a good practice to conduct a functional assessment or professional verification to ensure that the denial of eligibility was appropriate, in case of a subsequent question or appeal. Eleven of the 16 determinations that found applicants to be conditionally eligible appeared to be very thorough. In each of these cases, the files included a complete and appropriate list of issues and barriers that would prevent fixed route use and confer eligibility.

In another four cases where conditional eligibility was granted, the decisions seemed relatively complete. In each case, one additional condition should have been considered. In two cases, the applicants used walkers and the assessment noted a slow walking speed. Both applicants were granted eligibility when distances to/from bus stops were more than two blocks, when there were steep hills, and when there was no sidewalk or no even path of travel. The inability to cross wide streets should also have been included as a condition, since all four applicants were likely to encounter major streets or intersections at points throughout the service area where they did not have sufficient walking speed to reasonably and consistently cross wide streets.

In one of the 16 cases where conditional eligibility was granted, the applicant had late-stage renal failure and was receiving dialysis treatment. The determination granted conditional eligibility for return trips from dialysis. The determination should not have been tied to a specific trip purpose. Instead, it would have been more appropriate to grant conditional eligibility for trips when severe fatigue prevented use of the fixed route service.

DTS must ensure that its eligibility process first either grant conditional eligibility to applicants who are able to use fixed route under some conditions, or it must grant unconditional eligibility to these applicants. The conditional eligibility determination letter must identify the applicant's functional limitations and the environmental conditions that prevent the applicant from using fixed route. The conditional eligibility letter should list the condition as severe fatigue due to treatment. Next, in trip-by-trip eligibility, DTS must apply the individual's conditions to his or her specific trips requests based on the trip origin and destination and must do so for every trip request to determine whether or not the trip is to be taken on Handi-Van or on TheBus.

The review team discussed with IP the issue of limiting eligibility to a particular trip purpose, dialysis, in this case. While the intent is to provide ADA paratransit service at times when the person's health condition and/or the effects of the treatment make the person too fatigued to be able to use fixed route service, tying eligibility to dialysis trips only is not appropriate. For example, a person with end-stage renal failure may be too fatigued not only when they are traveling to and from dialysis treatment, but at other times as well. Limiting their eligibility to

dialysis trips only would prevent them from using Handi-Van service to make other trips at times when they are too fatigued to use fixed route service. Instead of tying eligibility to a particular trip purpose, DTS must grant eligibility for trips when severe fatigue prevents a rider from using fixed route service. IP staff stated that conditional eligibility determination letters would be revised accordingly.

Appeal Process

Section 137.125(g) of the DOT ADA regulations contains the requirements for administering the eligibility appeals process through which individuals who are denied eligibility can obtain review of the denial. The transit system is permitted to require that an appeal be filed within 60 days of the denial of an individual's application. The appeals process must include an opportunity for the applicant to be heard and to present information and arguments. The decision on the appeal must be made by a person not involved with the initial decision to deny eligibility, must be communicated in writing and must explain the reasons for the decision. During the pendency of the appeal, the transit system is not required to provide paratransit service to the applicant. However, if a decision is not made within 30 days of the completion of the appeal process, the applicant must be provided paratransit service from that time until and unless a decision to deny the appeal is issued.

At the time of the on-site review, since the process was still relatively new, the Manager of the eligibility center and DTS staff stated that no appeals had been requested. Therefore, the review team was not able to review appeal decisions to determine whether or not the appeal process met the requirements §37.125(g) of the DOT ADA regulations.

At the time of the review, DTS policy was that individuals who do not agree with the initial eligibility decision could request an appeal within 60 days of receipt of the determination letter, (or longer at the discretion of the DTS Director). To request an appeal, individuals were instructed to sign a one-page *Notice of Appeal* (Attachment C) and send it to DTS' Paratransit Operations Branch at 650 South King Street. The form asked applicants to mark a line on the form to indicate that they were appealing a denial of eligibility or if they believe they are unconditionally eligible but were granted conditional eligibility. Copies of the form and the description of the appeal process are provided in Attachment C.

A three-person panel was to hear appeals. Appeal panel members were to be selected from among members of DTS' Committee on Accessible Transportation (CAT), an advisory committee made up of disability service organizations and TheBus and Handi-Van riders. CAT members were to be selected based on their knowledge of particular types of disabilities and on the specific disability of the appellant.

DTS policy as explained in the *Notice of Appeal* was to arrange an appeal hearing within 20 days of receipt of the request. The process was designed to follow Hawaii administrative hearing requirements (HRS, Chapter 91). All decisions were set forth in writing.

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 transit systems 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 1–2 hours of the scheduled trip time.

As mentioned in Section 3.3 of this report, the *Rider's Guide* (Page 22) stated that vehicles will wait a minimum of 5 minutes at pickup locations for riders to board. This section of the *Rider's Guide* also defines a late cancel as one made less than 2 hours before the scheduled pickup time. It also says a late cancel is treated as a type of no-show. Page 23 defines a no-show as a rider failing to take a scheduled trip without proper cancellation, or failure to board before the vehicle has waited the required 5 minutes. The *Rider's Guide* does not state that the vehicle must arrive within the pickup window. Vehicle wait time and no-show/late cancel policy issues are discussed in Chapter 9 of this report.

The Special Transit Services section of DTS' *Rules and Regulations* (Page 13) stated the following regarding possible suspension for no-shows:

> A cardholder who is a "No-Show" three or more times in a month may be subject to the suspension of special transit services to him/her at the discretion of the Director of the Department of Transportation Services Hearing Officer. The first such suspension of special transit service shall be for not longer than one (1) month. Suspensions for violations of this rule after the first suspension shall be for not more than six months.
>
> Prior to suspending service for any cardholder, the Director or his or her authorized representative shall send at least one (1) written notice warning the cardholder that a subsequent failure of the cardholder to appear at the scheduled pickup time will result in suspension.

At the time of the review, DTS and OTS staff stated that riders were not suspended for no-shows and that the policy has not been enforced for the past three years.

Findings concerning DTS no-show policy are discussed in Chapter 9 of this report.

6.6 Findings

1. To meet the requirements of §37.125(c) of the DOT ADA regulations, DTS must revise its public information to explicitly inform applicants and prospective applicants that if DTS has not made an eligibility determination within 21 calendar days, presumptive eligibility will be granted and service will be provided on the 22nd day until and unless DTS denies the application. As part of DTS' response to this finding, FTA requests that DTS clarify when an application is considered complete, as the October 2009 eligibility process eliminated paper applications. It is unclear whether an application is considered complete when an applicant participates in the interview/assessment, or if, as described in Section 6.2 of this report the IP Mobility Coordinator (MC) decides after the interview/assessment whether sufficient information has been gathered to make a determination. Secondly, FTA requests the current average number of days between a request for an appointment and the actual interview/assessment. Third, FTA requests that DTS describe the current maximum and average number of steps and days, beginning with an applicant's call for an interview/assessment, needed to complete the eligibility determination processes, for both

new applicants and those applying for recertification. Finally, FTA requests that DTS specify the frequency of its review of IP's eligibility determinations.

2. At the time of the review, Innovative Paradigms (IP), DTS' contractor for eligibility determinations, was not recording or tracking milestones in the eligibility determination process. Developing a system for tracking milestones in the application process, including the dates that interviews/assessments are requested, offered and accepted and scheduled, dates that customers no-show for these appointments, and the date that the determination letter is mailed is essential for DTS to grant presumptive eligibility as required.

3. At the time of the review, IP's Mobility Coordinators (MCs) overlooked or did not consider potential barriers related to street crossing, such as crossing wide streets and busy intersections and the functional walking speed necessary to accomplish these tasks when making final determinations, even though these factors were listed on the *Determination Form*, a thorough checklist of potential barriers that IP had developed for MCs to use when making final determinations. This observation was supported by the review team's analysis of a sample of determinations, as at least one condition was omitted in each of the four conditional determination decisions reviewed. DTS must direct IP MCs and Managers to consider all barriers to using fixed route service on IP's *Determination Form* when applicants are granted conditional eligibility, including walking speed and the ability to cross wide streets and busy intersections. Please provide a copy of the directive to FTA.

4. One of the 41 suggested questions, making up the paratransit application at the time of the review, that MCs used during the interview/assessment asked applicants to describe "any obstructions or barriers between your home and the closest TheBus stop that affects your ability to travel by yourself." To meet the requirements of §37.125 of the DOT ADA regulations, this question and public information containing this question must be revised to address travel to and from origins and destinations throughout the service area, rather than just soliciting information about potential barriers between applicants' homes and the closest bus stops. DTS must also ensure that eligibility determinations are based on an individual's functional abilities to use fixed route service to travel between any origin and destination within the service area, rather than proximity to a particular bus stop. Not all trips than an applicant may make will begin at home, and environmental conditions that may interact with a rider's disability to prevent use of the fixed route service (terrain and lack of curb ramps, for example) are not necessarily identical to those surrounding the stop that is closest to the individual's home. In addition to revising this question, DTS must also revise all public information containing this question, including online information entitled "What Information [D]o I [N]eed at my [I]n-[P]erson Interview?" As part of DTS' response to this finding, please provide copies of the directive, revised public information and the revised set of suggested interview questions to FTA.

5. At the time of the review, the sample letters provided to the review team granting conditional or temporary eligibility did not contain information about the right to appeal the decision. To meet the requirements under §37.125 of the DOT ADA regulations, DTS must ensure that its eligibility determination letters granting temporary or conditional eligibility inform applicants of the right to appeal, since these determinations limit a rider's eligibility. DTS must inform similarly-situated riders who were not afforded their right to appeal that they may reapply for eligibility. DTS must direct IP to revise determination letters accordingly and provide examples of the revised letters and a copy of the directive to FTA. As part of

DTS response to this finding, please submit an example of letters and/or other public information sent to these riders informing them of the right to reapply.

6. In one of the 16 cases examined by the review team, DTS granted eligibility only for return trips from dialysis treatment. This policy does not meet the requirements under § 37.131(d) of the DOT ADA regulations, which prohibits restrictions based on trip purpose. The review team discussed this issue with IP, and IP agreed to revise the determination letters accordingly. DTS must provide examples of the revised letters to FTA, and inform similarly-situated riders whose eligibility has been linked to trip purpose that they may reapply for eligibility. As part of DTS response to this finding, please submit an example of letters and/or other public information sent to these riders informing them of the right to reapply.

6.7 Recommendations

1. Track the number of requests for interview appointments, the number of interviews conducted, and the number of determinations made each month. Documenting this information is also important for ensuring that delays are not being caused by a shortage of MCs. If the number of requests is still or continues to be significantly lower than requests for eligibility before the October 2009 eligibility determination process was implemented, consider discussion with the DTS advisory committee and the community to identify any issues that may potentially prevent or discourage potentially eligible individuals from applying.
2. Consider and direct IP to conduct professional verification and/or a functional assessment when the applicant is likely to be determined ineligible, rather than denying eligibility based solely on the interview. This additional information could help support that the denial of eligibility was the appropriate decision, in the event of a subsequent question, complaint or appeal.
3. Consider increasing the regularity of DTS reviews of IP's eligibility determinations.
4. Provide training to CAT members on the regulatory requirements of the appeal processes for appeals of eligibility determinations and appeals of proposed suspensions of service for a pattern and practice of no-shows.

7 Telephone Access

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

Section 37.131(b) of the DOT ADA regulations requires that service must be scheduled and provided at any requested time in response to a request for service made the previous day. For example, e.g., a rider must be able to make a reservation at 4:45 p.m. for a pickup at 8 a.m. the following morning. Requests must be accepted during normal business hours, even on days that

the agency may not otherwise be providing service (e.g., trip requests taken on Sunday for a trip on the following Monday). In addition, Section 37.131(f) prevents a transit system from limiting the availability of service (capacity constraint). This chapter summarizes the review of the telephone system used for placing, changing, or confirming trip reservations or checking on the status of a ride

The review included:

- Rider comments obtained through telephone interviews with riders, advocates, and agencies
- Standards for telephone answering performance
- 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 Consumer Comments

Two of the three riders contacted in advance of the on-site review stated that they had experienced long hold times when calling both to place trip requests and to check on rides. One rider said that sometimes when calling dispatch, the phone will be answered in a reasonable time, but then the dispatcher will place the call back on hold. The second person said that she had experienced hold times of between 10 and 20 minutes.

The third person contacted in advance said that hold times when calling to place trip requests were “not too bad.” She said that the line sometimes is busy, on certain days or at certain times, but that overall it was “okay.” However, she said that hold times can be very long when calling dispatch to check on the status of a ride. She also mentioned that sometimes when calling dispatch the phone rings and rings and is not answered.

Several riders who attended the CFADAR meeting on January 25, 2010, also commented on telephone service. The general consensus was that hold times when calling reservations to place a trip request were reasonable. One person said that hold times seemed to be longer on Mondays and Fridays. The group indicated that hold times in dispatch when calling to check on the status of a ride are often excessive. The issue of calls not being answered (the phone in dispatch just ringing and ringing) was again brought up in this meeting.

Comments on file at DTS and OTS did not appear to identify telephone hold times or telephone service as a major concern. These issues were mentioned in one of the complaints examined by the review team.

Telephone service was not mentioned as a concern in the one formal complaint related to Handi-Van service on file with FTA at the time of the review.

7.2 Phone Service Standards and Performance Monitoring

According to information provided by DTS, its telephone performance standard was that all calls be answered within 3 minutes and that 80 percent of all calls be answered within 2 minutes. The standard also requires that no more than 10 percent of calls be abandoned.

OTS managers stated they had the ability to generate daily telephone reports that showed: the average hold time by hour of the day; the number and percentage of abandoned calls by hour of

the day; and the number of calls answered. OTS managers stated that they reviewed these reports periodically to evaluate the level of telephone performance. It appeared to be possible to measure average hold times for each day from one to nine minutes (in one minute increments) and all longer hold times in an over nine minutes category. .

7.3 Phone System Design

DTS and OTS advertise one main voice telephone number for Handi-Van service (808-456-5555). This number allows toll-free calls to be received from throughout the island. A separate TTY number is also advertised (808-454-5045).

When riders call the main number, they are given four options. They are directed to:

- Press "1" to place a reservation
- Press "2"to report a late van, check an estimated time of arrival ("ETA"), or cancel a ride for today
- Press "3" for customer service or for lost and found
- Press "4" for an application form or for information about eligibility

Callers could remain on the line and be transferred to the next available agent (a reservationist if during reservations hours, or a dispatcher if after hours).

At the time of the on-site review, OTS had an Avaya telephone system with an automatic call distributor (ACD). The system was used to handle calls for both TheBus and Handi-Van service and was equipped to record all calls. OTS Managers stated that it was an older recording system that did not have the latest digital searching capabilities, but that it was adequate for training and for investigating complaints. The system allowed 92 incoming calls at any given time.

A review of telephone service records indicated that between 20 and 60 calls were received in reservations per hour and between 5 and 30 calls were received in dispatch per hour.

7.4 Reservations and Dispatch Staffing

As mentioned earlier in this report, Handi-Van accepted trip reservations from 8 a.m. until 5 p.m., 7 days a week, 365 days a year. The dispatch area was typically staffed from 3:30 a.m. until 1 a.m., and longer if early morning trips are scheduled in the corridors where 24-hour service is available.

At the time of the on-site review, OTS employed 12 reservationists, three lead reservationists, and 12 dispatchers to handle trip bookings, "Where's My Ride?" (WMR) calls, and dispatch responsibilities. Agents assigned to the WMR group were the first point of contact for riders reporting a late van or seeking an ETA. They assisted callers directly whenever possible and would seek help from dispatchers if they could not provide an answer directly. This allowed dispatchers to focus more on run management.

The 12 reservationists and three lead reservationists typically allowed five agents to be assigned to handle trip requests each day from 8 a.m. to 5 p.m. It also allowed for two or three agents to be assigned to the WMR function.

The 12 dispatchers provided for four during weekday peaks, three during "shoulder" times, and two during late-evening and early-morning hours.

At the time of the review, OTS managers anticipated increasing the number of reservationists. They acknowledged that there were issues with hold times at certain hours of the day. They also acknowledged that the WMR function was understaffed. Two additional agents were scheduled to begin working on February 7, 2010, which would allow for one additional WMR agent, plus additional reservations capacity.

The review team discussed with OTS managers the issue of WMR calls ringing multiple times without being answered which had been reported by customers contacted in advance of the review. OTS stated that, because the WMR area was currently understaffed, the phone system was set to automatically transfer calls from WMR agents to dispatchers if calls were not answered within 30 seconds. Once transferred to a dispatcher, the phone could ring and not be answered if the dispatcher was busy with a high-priority issue. OTS managers anticipated revisiting the phone system design once additional staff was in place.

7.5 Telephone Service Performance

During the on-site review, the review team obtained copies of call management reports. This included reports for both the reservations call group and the WMR call group (labeled the "HV Cancellation Grp").

Maximum hold times for calls to the reservations area were reviewed for the months of November and December 2009. Table 7.1 summarizes the key information in reports for these two months. Copies of the reports from which this data was gathered are provided in Attachment D.

Table 7.1 – Reservations Call Group Performance, November and December 2009

	November 2009	December 2009
Total ACD Calls Received	21,799	22,941
Calls Answered Within 2 Minutes	14,837 (68%)	16,727 (73%)
Calls Answered Within 3 Minutes	17,605 (81%)	19,384 (84%)
Calls on Hold For More Than 9 Minutes	79 (0.4%)	29 (0.1%)
Percent of Calls Abandoned	1,485 (6.4%)	1,457 (6.0%)

As shown in table 7.1, 68 percent of all calls received in November 2009 were answered within 2 minutes, and 81 percent of all calls were answered within 3 minutes. Seventy-nine calls, or 0.4 percent, were on hold for more than 9 minutes. Approximately 6.4 percent of calls were abandoned during the month. Performance was slightly better in December 2009, with 73 percent of calls answered within 2 minutes, 84 percent answered within 3 minutes, 0.1 percent of calls on hold for more than 9 minutes, and approximately 6 percent of all calls abandoned.

The rate of abandoned calls for these months met the adopted standard of having no more than 10 percent of calls abandoned. The hold times, however, did not meet the standard to answer 80 percent within 2 minutes and 100 percent within 3 minutes.

To get a better idea of hold times throughout the day, the review team analyzed detailed hourly call information for Friday, November 13, 2009. The report showing hold times by hour for this day is provided as part of Attachment D. The analysis showed that hold times were significantly higher from 8–9:30 a.m., and from 2–5 p.m.

The review team then analyzed maximum hold times for WMR calls for the week of December 6–12, 2009. Table 7.2 shows excerpts from reports for this week; copies of the actual reports are provided as part of Attachment D.

Table 7.2 – HV Cancellation (WMR) Call Group Performance, December 6–12, 2009

Date	Total ACD Calls Received	Answered Within 2 Minutes		Answered Within 3 Minutes		On Hold For >9 Minutes.	
		No.	Pct.	No.	Pct.	No.	Pct.
6-Dec	183	164	90%	172	94%	0	0%
7-Dec	406	216	53%	278	68%	8	2%
8-Dec	363	246	68%	291	80%	3	1%
9-Dec	438	307	70%	349	80%	7	2%
10-Dec	430	229	53%	283	66%	21	5%
11-Dec	435	291	67%	358	82%	17	4%
12-Dec	137	75	55%	97	71%	0	0%
Total	**2,392**	**1,528**	**64%**	**1,828**	**76%**	**56**	**2%**

As shown in Table 7.2, 64 percent of all calls received during this week were answered within 2 minutes.

In total, 76 percent of all calls were answered within 3 minutes. Performance on Monday, December 6, 2009 was best, with 94 percent of calls answered within 3 minutes. For the other days, 66–80 percent of calls were answered within 3 minutes. Two percent of calls were on hold for more than 9 minutes, with the longest holds occurring on Thursday and Friday.

The analysis of this sample week indicated that performance did not meet any DTS standard for answering calls. Hold times were well above the levels called for in the DTS standards.

7.6 Findings

1. At the time of the review, while DTS had set reasonable standards for telephone performance, OTS met the standard only for abandoned calls. Performance in the reservations and “HV Cancellation” call groups were well below the established standards with some calls on hold for more than 9 minutes. In addition use of averages as a performance standard can mask individual call times and periods of poor performance; it is possible to meet an average standard while still experiencing significantly longer hold times at specific times of day and/or on specific days of the week. To meet the requirements of §37.131(f) to operate Handi-Van service without any operational pattern or practice that significantly limits the availability of service, the maximum allowable hold time standard must be set to avoid significantly long hold times. Telephone hold times must be regularly tracked and monitored against this standard and staffing must be adjusted in the call groups to avoid a pattern or practice of significantly long hold times. Along with a revised performance standard, DTS must establish a policy or procedure to regularly monitor performance and must direct OTS to adjust staffing to meet the standards. As part of DTS’ response to this finding, please provide to FTA a copy of DTS’ revised telephone performance standard and its procedure for monitoring OTS’ performance which also specifies the frequency of OTS’ periodic reviews /evaluation of its own performance.

7.7 Recommendations

1. Base the hold time standard on maximum hold time rather than average hold time. The concern with using average hold times is that this standard could be met while masking periods of poor performance and actual individual call times during the month. If an average hold time standard is used, call for a specific percentage of hourly call periods to have shorter hold times than the average. When measuring hold times, use 15 or 30-minute increments, rather than entire hours.
2. Direct OTS to hire additional reservationists to increase staffing in both the reservations and WMR groups, if it has not already done so. At the time of the review, DTS had set reasonable standards for telephone performance. OTS employed 12 reservationists and three lead reservationists, which allowed five reservationists to be assigned to handle trip requests for most of the week, and two or three to be assigned to take WMR calls. This level of staffing did not appear adequate to handle calls within the DTS established performance standards; additional reservationists and WMR agents were needed to reduce telephone hold times and to handle calls without excessive delays. OTS managers indicated that they anticipated adding two additional agents to the daily schedule starting in February 2010. DTS' *Update* stated that two additional staff were tentatively scheduled to start work on October 11, 2010.
3. Once additional staff is added, review and direct OTS to review the telephone system setting that automatically redirected WMR calls to dispatchers if calls were not answered within 30 seconds. Consider alternate approaches to keep calls from ringing many times without being answered. At the time of the on-site review, if calls were not answered by WMR agents within 30 seconds, the telephone system automatically transferred calls to dispatchers. If dispatchers were handling other priority issues, this caused the phone to ring many times without being answered. This concern was reported by at least three customers contacted in advance of the review.
4. If the Automatic Call Distributor will not generate a busy signal report, direct OTS to request a report from its telephone service provider.

8 Reservations

While the previous chapter addressed access to reservations, this chapter focuses on how DTS handled trip requests.

Section 37.131(b) of the DOT ADA regulations require the transit system to schedule and provide paratransit service to any ADA complementary paratransit eligible person at any requested time on a particular day in response to a request for service made the previous day. Reservations may be taken by reservation agents or by "mechanical means" and can be made via "real-time scheduling." A transit agency may negotiate pickup times with the rider but cannot require the rider to schedule a trip to begin more than one hour before or after the individual's desired departure time. At the transit system's discretion, reservations may be made up to 14 days in advance.

Section 37.133 of the DOT ADA regulations allows subscription trips, i.e., pre-arranged trips at a particular time not requiring individual trip reservations for each trip. Such trips may not comprise more than 50 percent of the available trips at any given time if there is a capacity constraint at that time of day. If the paratransit service operates without capacity constraints, there is no limit to subscription service.

In this part of the review, particular attention is paid to policies regarding trip reservations and whether DTS uses any form of trip caps or waiting lists. In addition, the review team researched whether there is a pattern or practice of denying a significant number of ADA-eligible trip requests. Finally, this portion of the review examined the policies and procedures concerning the negotiation of requested trip times.

8.1 Consumer Comments

Three riders who were contacted by the review team in advance of the on-site review or who attended the CFADAR meeting stated that they sometimes experience trip denials. One said that trip denials are very occasional. A second said it was a "little more than occasional." The third rider said she could recall one instance in recent months when she was denied a trip because the schedule was full. One other rider said that her trip requests were always accommodated.

Four riders indicated that while there are not outright denials, the times offered can be more than an hour from the desired or requested time. These riders indicated that in areas outside of the City of Honolulu, pickups are only scheduled every other hour (e.g., 6 a.m., 8 a.m., 10 a.m., etc.). One gave an example of having to take a 6 a.m. pickup for a 9 a.m. appointment in Honolulu because taking the 8 a.m. time would not guarantee that she would get to her appointment on time. Another rider said that trips in the City of Honolulu are scheduled every hour on the hour but that this can also result in pickup times that get her to appointments very early. She gave an example of taking an 8 a.m. pickup time for a 9:30 a.m. appointment because taking a 9 a.m. pickup might get her to her appointment late. She said the trip was relatively short, so she got to her appointment very early.

Riders who attended the on-site meeting explained that hourly and bi-hourly time slots are only used for weekday travel. They said that weekend service is scheduled based on the desired pickup or arrival times and is more precise.

The review of complaints received by OTS and DTS from June 28, 2009–January 28, 2010, did not identify any complaints related to trip denials, waiting lists, trip caps, or trips scheduled at times that were more than 1 hour from the time requested by the riders. The one formal complaint on file with FTA at the time of the review did not mention these issues either.

8.2 Standards, Policies, and Procedures

The response time provisions of DOT ADA regulations differentiate between next day reservations and advance reservations. Section 37.131(b)(4) states that a transit agency may permit reservations to be made up to 14 days in advance of an ADA paratransit eligible individual's desired trips. Providing advance reservations is optional; providing next day service is required under Section 37.131 (b).

OTS accepted trip reservations daily from 8 a.m. to 5 p.m. up to 7 days in advance. This DTS policy met the requirements under the DOT ADA regulations at 37.131(b).

Same-day reservations could be made on a space-available basis.

As mentioned in Section 3, DTS defined trip denials as any of the following:

- Riders were only offered pickup times more than an hour from their request, which were counted as a denial, regardless of whether or not the riders accepted them.
- Riders had to accept a pickup time that required them to leave their origin earlier than they were able to leave (e.g., leave work early).
- Riders accepted a drop-off time that is later than their stated appointment times.
- Riders were only offered one leg of a round trip,in which case two denials were recorded.
- Any outright inability of DTS to serve a next –day trip.

In documentation provided in advance of the on-site review, DTS stated that its goal was to have no denials. DTS and OTS staff also stated that they did not employ waiting lists for non-subscription trips, nor did they impose any kind of cap on the number of trips that riders could take.

8.3 Review of Reported Trip Denials

Under Section 37.131(b) of the DOT ADA regulations, the transit system may negotiate pickup times with a passenger, but cannot require the passenger to schedule a trip to begin more than one hour before or after his or her desired departure time. If the trip cannot be arranged within this timeframe and the passenger accepts a departure time of more than one hour earlier or later, this still constitutes a denial of service and must be counted as a denial, whether the rider accepts the offer or not.

At the time of the onsite review, OTS and DTS staff stated that there were a small number of trip denials and that any trip denials that occurred were recorded and tracked.

Trip-denial data as well as total ridership data were provided for the period from January 2007–October 2009, as shown in Table 8.1. In 2007, Handi-Van provided 761,303 trips and 185 trip denials were recorded (0.08 percent of all trips requested and not cancelled or no-showed). In 2008, 718,009 trips were provided and 1,376 trip denials were recorded (0.19 percent). For the

first 10 months of 2009, 782,498 trips were provided and 553 trip requests were recorded as being denied (0.07 percent).

Table 8.1 – Reported Handi-Van Trip Denials, January 2007–October 2009

Year	Total Passengers	Number	Percent
2007	761,303	585	0.08%
2008	718,009	1,376	0.19%
2009**	782,498	553	0.07%

* Percent denials are calculated as a percent of total trips requested and not cancelled or no-showed. Denials as a percent of total trips requested, which would include cancellations and no-shows, would be lower.

** 2009 figures for January to October 2009 (10 months)

The review team analyzed detailed information about trips denied for the period from July 1–December 31, 2009. There were 78 trip denials recorded during this period. Of these 78 trip denials, four trips were denied outright and never scheduled. The remaining 74 denials were recorded as such because the times scheduled were more than one hour from the times requested by riders.

Trip Denials by Location

Reported trip denials were also analyzed based on geographic location. This analysis indicated that the denials were spread out over 30 different communities or neighborhoods throughout the island. The largest geographic group of denials (12 of the 78) was for trips originating in the Honolulu/Downtown/Waikiki areas. Seven were for trips originating in Ewa Beach. Six of the 78 were for trips requested from Aiea. Five were for trips from Liliha. There were four denials each for trips originating in Waianae, Ala Moana, Tripler, and Kakaako. In addition, the remaining 32 denials were spread out over 22 communities, with only one or two per community. Almost all of the locations with more than two denials during this period were in the south-central part of the island where most service is provided. The one community that is somewhat remote that had more than two denials was Waianae, which is located on the far west of the island and had four denials during the 6-month period of analysis. In general, the analysis showed the reported denials to be in the areas with greatest demand and did not suggest higher denial rates in more remote parts of the island.

Trip Denials by Day

Next, the 78 denials were analyzed based on the day of the week. Table 8.2 shows the distribution of denials. The analysis indicated that there was some concentration of denials on Tuesdays, when the chance of being denied a trip was approximately twice as high as on other weekdays. Other than Tuesdays, there was a fairly even distribution for the rest of the weekdays. In addition, the percentage of denials on weekends was approximately one-third to one-half as high as on weekdays.

Table 8.2 – Analysis of a Sample of Trip Denials by Day of the Week

Day	Number	Percent of Total
Monday	14	18%
Tuesday	22	28%
Wednesday	10	13%
Thursday	12	15%
Friday	12	15%
Saturday	5	6%
Sunday	3	4%
Total	**78**	**100%***

* Days do not total 100% due to rounding

Third, the sample of 78 trip denials from July 1–December 31, 2009, was analyzed by time of day. The distribution is shown in Table 8.3. As shown, the distribution tends to follow trip volume throughout the day, with low denials in very early morning and late evening hours, and a higher number and percentage during the peak operating hours of the day. A slight spike in denials was noticed during the 11 a.m. to noon period and from 1–2 p.m. that appeared to be related to capacity and having fewer vehicles on the road during these shift change times. The analysis showed that denials were dispersed throughout the day and that an overall increase in capacity during most hours of operation was needed.

Table 8.3 – Analysis of a Sample of Trip Denials by Time of Day

Time of Day	No. of Denials	% of Total Denials
5–6 a.m.	1	1%
6–7 a.m.	2	3%
7–8 a.m.	2	3%
8–9 a.m.	7	9%
9–10 a.m.	7	9%
10–11 a.m.	7	9%
11 a.m.–12 n	11	14%
12–1 p.m.	2	3%
1–2 p.m.	8	10%
2–3 p.m.	7	9%
3–4 p.m.	9	12%
4–5 p.m.	6	8%
5–6 p.m.	3	4%
6–7 p.m.	1	1%
7–8 p.m.	2	3%
8–9 p.m.	1	1%
9–10 p.m.	1	1%
10–11 p.m.	0	0%
11 p.m.–12 m	1	1%
Total	**78**	**100%***

* Time periods do not total 100% due to rounding

Trip Denials by Rider

Finally, the sample of trip denials was analyzed by rider to determine if some riders had experienced multiple trip denials during the six-month period. The analysis showed that the sample of 78 trip denials had been recorded for 71 different individuals. Sixty-four individuals had each been denied one trip. Seven individuals had been denied two trips during the period. No riders in the sample had been denied more than two trips.

8.4 Observations of the Handling of Trip Requests

At the time of the review, OTS used Trapeze software to record, schedule, and dispatch trips. Handi-Van managers wished for reservationists to eventually schedule all trips to actual runs in the system. At the time of the on-site review, reservationists were scheduling only weekend onto runs, to test the impact of this change.

For weekend trips, reservationists searched for open time slots and scheduled trips onto runs where possible. Reservationists queried the system for actual scheduling solutions rather than leaving trips in the system as unscheduled ("UNS") for the scheduler or dispatcher to handle later. . If the Trapeze system produced an acceptable scheduling option, the reservationist confirmed the time with the rider, the time was locked in as the "negotiated time," and the system showed the trip as being scheduled.

Reservations booked requests for weekday trips in Trapeze without actually scheduling the trips onto runs. While trips booked for weekdays were left unscheduled in the system, callers were left with the understanding that the times negotiated and entered would be honored. As discussed in Section 9 of this report, schedulers were instructed to call riders back if adjustments had to be made to the pickup times entered into the system.

Review team members spent several hours observing the trip reservation process. When handling requests for weekday trips, reservationists, with only slight variation, followed the procedure detailed below:

1. The reservationist first asked the caller to provide his or her name. The rider was selected from the list of all registered riders contained in the Trapeze system. Once matched in the system, stored information system populated several fields in the trip-booking screen. The rider's home address populated the origin address, and the rider's telephone number and any mobility aids typically used were also shown.

2. The reservationist confirmed the home address and telephone number to ensure that the correct rider had been selected.

3. The reservationist asked the day and date of the trip. Both are requested to ensure that there was no confusion about the date that was entered.

4. The reservationist requested information about the trip origin. Typically, a reservationist asked if the caller would be leaving from home and, if so, confirmed that the home address that was automatically displayed was still correct. If the caller indicated that the trip would be starting from a different address, that information was entered in place of the home address.

5. The reservationist requested information about the destination. If the location was a common destination that had already been geocoded in the system, the reservationist selected the location from a pop-up list. If the address was not in the list, the reservationist entered the exact street address and community and then attempted to confirm the location through geocoding.

6. The reservationist then asked if there was a phone number at the destination, should the dispatchers need to reach the rider about their return pickup. A phone number was entered if available.

7. If the destination was not selected from the pop-up list, the reservationist requested descriptive information about the location. Typically, she would ask “What is there?” and would then enter the description of the destination (e.g., store name, business name, etc.) in the destination comment field.

8. Next, the reservationist asked for information about the time of the trip. Riders were able to request trips based on either a desired pickup time or an appointment time. Typically the reservationist would first ask if there was a desired arrival or appointment time. If there was, this time was entered into the latest drop-off time field in the destination portion of the trip-booking screen. If there was no appointment or desired arrival time and the rider instead wanted to book the going trip based on a pickup time, the requested pickup time was entered into the requested time field in the origin portion of the trip-booking screen.

9. The reservationist asked “Will you be going by yourself?” to get and enter information about companions or an attendant traveling with the eligible rider.

10. The reservationist confirmed information automatically called up from the client file regarding mobility aids by asking something like “Will you be using your wheelchair?”

11. Next, the reservationist asked if the rider would be paying with cash or coupons and entered this information.

12. Once all of the above information was entered, the reservationist placed the request in the system for the first leg of the trip. For weekday trips, the trips were left unscheduled in the system.

13. The reservationist then asked the time that the rider would like a return trip, flipped the origin and destination addresses in the trip-booking screen, and logged in the request for the return trip. The return trip was also left unscheduled in the system (for weekday trips).

14. After information about all requested legs of the trip was entered, the reservationist would read back and confirm key trip information with the rider. This included the date, times, addresses, etc. of all trips booked.

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Set Vehicle Tours and Trip-Time Matrices

In order to accommodate as many trips as possible throughout the entire island, Handi-Van schedulers have developed set tours for vehicles. In areas of the island where population density is higher and Handi-Van trips are concentrated, tours are designed to allow pickups on the hour. In outlying areas of the island, tours are designed to only accommodate pickups every 2 hours (generally on the hour). For some types of trips—to and from very remote locations—even more limited routing has been established, with maybe one or two trips per day to and from these areas. The design of these tours also includes required transfers when traveling to and from certain parts of the island.

These set vehicle tours are summarized in a series of matrices. In total, there were 33 matrices that defined the flow of vehicles throughout the island at various times of the day. Copies of two of the matrices—one for daytime trips from Honolulu to various parts of the island and one from Waianae to various parts of the island—are provided in Attachment E. As the matrix for Honolulu shows, pickups can be scheduled on the hour throughout the day for trips to other locations within the city. Hourly service is also permitted for travel to many other parts of the island. For trips from Honolulu to the west side of the island, though, less frequent service is provided. If riders are going to Kaneohe, for example, the matrix shows that pickups can be scheduled only at 5:45, 6:15, 8, 9, and 11:30 a.m., and 1, 3, and 5 p.m. There is another matrix for evening travel after 5 p.m.

The matrix in Attachment E for trips from Waianae shows even more limited tours. For example, riders who want to request direct (non-transfer) trips from Waianae to the central part of the island must request pickups at either 6, 8, or 11 a.m. or 3 p.m. Trips can also be requested at noon, 1, 2, and 5 p.m., but require transfers. Trips from Waianae to the eastern parts of the island are typically only available every 2 hours and almost always require a transfer. In addition, as shown in the right-hand margin of the Waianae matrix, when traveling eastbound from Makaha, trips are only available at 1 p.m.

While the set vehicle tours provide pickups at least every 2 hours, this restriction of allowed pickup times can result in very early pickups and very early drop-offs. For example, with service provided every other hour from Waianae to Honolulu, if a rider has an appointment in Honolulu at 10 a.m., they must request a pickup at 7 a.m. This is because service only operates in this direction at 7 and 9 a.m., and the 9 a.m. pickup time would not ensure an on-time drop-off given the expected travel time. An 8 a.m. pickup would be ideal, but is not available for trips going from Waianae to Honolulu.

Summary of Firsthand Observations

Review team members observed the reservations process for several hours on January 25 and 26, 2010. Review team members sat with several different reservationists and used telephone splitters to listen to conversations with riders. Review team members directly observed the handling of 188 trip requests. For each request, the day and times of the trip was recorded. Table 8.4 summarizes the results of these observations. The “Days in Advance” column refers to the number of days in advance of the day of service that the trip request was placed. “

Table 8.4 – Summary of Observations of the Handling of 188 Trip Requests

Days in Advance	Trip Requests Observed:	Requests Scheduled w/Times within an	Requests Scheduled More than Hour

	No. (Pct)	Hour of the Requested Time	from the Requested Time (Denials): No. (Pct.)
Same day	2 (1%)	2	0
1	93 (50%)	90	3 (1.6%)
2	34 (18%)	34	0
3	27 (14%)	27	0
4	14 (7%)	14	0
5	9 (5%)	9	0
6	6 (3%)	6	0
7	3 (2%)	3	0
Total	**188 (100%)**	**185**	**3 (1.6%)**

As shown in Table 8.4, all 188 of the trip requests observed by the review team were scheduled. While no trips were denied outright due to lack of capacity, three trips were denials and were not counted as denials. The set vehicle tours and trip matrices which prevented scheduling and providing hourly service to the three pickup locations were a likely cause of riders accepting pickup times that were more than one hour from the times they requested In one of the three instances,, a rider finished her appointment at 1:15 p.m. and requested a pickup between 1:15 and 1:30 p.m. Pickups were only available at 1 p.m. and 3 p.m. however. The trip was scheduled at 3 p.m., 1 hour and 45 minutes after the desired pickup time.

In all three cases, reservationists appeared to simply book the trip. They did not appear to use the pop-up screen that is used to code trips as denials. These observations suggest that the actual level of trip denials, including denials where trips are scheduled at times that were more than 1 hour from the time requested by the riders could be higher than the number of denials recorded in the system.

As shown in Table 8.4, 50 percent of all trip requests observed were made 1 day before the service day, 18 percent were requested 2 days in advance, and a total of 82 percent were requested no more than 3 days in advance. This suggests that since there were some trip denials in the system, some riders felt that it was necessary to call more than one day in advance place trip requests.

All observed reservationists handled calls and scheduled trips in a professional manner. They were diligent in asking about and confirming important trip details, such as the mobility aids each rider would be using and whether or not riders would be traveling with attendants or companions.

The review team noticed that OTS had done a very thorough job of geo-coding common trip origins and locations in the reservation system. For large facilities with multiple entrances and exits, the common destination list contained separately geocoded detailed information for each entrance. When riders indicated that they were going to one of these locations, reservationists determined which entrance or exit would be used and selected that specific location from the list. When origins and destinations did not appear on the lists in the system, reservationists requested and recorded specific information in the system so that drivers would be able to find the location.

8.5 Findings

1. At the time of the review, DTS' contractor, Oahu Transit Service (OTS) was not properly recording trip denials, resulting in an undercount of denied trips. During the site visit, DTS and OTS staff acknowledged that Handi-Van denials were experienced. During the six months prior to the review, 78 trip denials were recorded. Four trips were denied outright and never scheduled. The remaining 74 denials were recorded due to pickups times being scheduled at times more than one hour before or after the times requested by riders. At the time of the site visit, the review team observed a total of 188 trip requests, three of which should have been recorded as denials due to riders accepting pickup times more than one hour from the time they requested. These three denials were not recorded as such by OTS personnel. To meet the response time requirements of §37.131(b), DTS must ensure that employees and contractors count and track as denials any outright inability to serve trip requests, including any trip which it cannot schedule within one hour before or after the eligible riders desired departure time (even if accepted by the rider). If only one leg of a round trip can be reserved and the rider declines the trip, it must be tracked as two denials. DTS must track and report this information to FTA. DTS must direct contractor(s) and subcontractors to re-train reservation agents to record trip denials, establish a procedure for reviewing reservation practices to ensure that these denials are properly recorded as denials, and provide a copy of the directive to FTA. As part of DTS' response to this finding, FTA requests the number of ADA paratransit trips requested, scheduled, provided, and denied for the past six months and DTS' short and long-range plans to eliminate all ADA trip denials.

2. At the time of the review, while trips booked for weekdays were left unscheduled in the system, callers were left with the understanding that the requested times would be honored. As discussed in Section 9 of this report, schedulers were instructed to call riders back if adjustments had to be made to the pickup times entered into the system. DTS must establish consistent policies to ensure that riders are actually called back and afforded the opportunity to negotiate pickup times prior to trips being scheduled. Given the large number of trips that were "unscheduled" going into the service day at the time of the review, FTA also requests additional information on the polices currently in place to ensure that schedulers do not change a rider's pickup time without their knowledge, and that any necessary changes are limited to within 60 minutes of the rider's originally-requested pickup time. In order to ensure that the list of unscheduled trips does not constitute a prohibited waiting list, we also request information on how DTS ensures that these trips are actually scheduled prior to the day of service.

8.6 Recommendations

1. As part of DTS plan to eliminate ADA paratransit denials, continue to revise and direct OTS to revise the matrices, while ensuring that more trips are not denied and trips are not denied outright.
2. When tracking and reporting denials to FTA, track and report separately instances where riders had to accept a pickup time that required them to leave their origin earlier than they were able to leave (e.g., leave work early)and instances where riders accepted a drop-off time that was later than their stated appointment times.
3. The review team noticed that OTS had done a very thorough job of geo-coding common trip origins and locations in the reservation system. For large facilities with multiple entrances and exits, the common destination list contained separately geocoded detailed information for each entrance. When riders indicated that they were going to one of these locations, reservationists determined which entrance or exit would be used and selected that specific location from the list. When origins and destinations did not appear on the lists in the system, reservationists requested and recorded specific information in the system so that drivers would be able to find the location. This is an effective practice to assist some eligible riders and drivers and it is recommended that this practice be continued.

9 Service Performance

Section 37.131(f) of the DOT ADA regulations for ADA complementary paratransit service prohibit capacity constraints—including missed trips, a substantial number of untimely trips, and excessively long rides and other operational practices that limit the availability of service to paratransit eligible riders. Consequently, the review team examined on-time performance, missed trips and no-shows, and on-board travel times for DTS ADA complementary paratransit service.

- Obtained comments from consumers regarding on-time performance and travel times through telephone interviews and a review of complaints filed with DTS
- Reviewed DTS relevant service policies, procedures, and standards
- Observed DTS scheduling and dispatch functions and interviewed the appropriate staff
- Interviewed drivers about schedules provided and dispatch support received
- Reviewed DTS on-time performance and travel time records
- Tabulated actual pickup and drop-off times recorded on completed manifests for a selected day
- Reviewed a sample of run manifests to assess average trip length
- Compared travel times of Handi-Van trips with those of comparable trips on TheBus

9.1 Consumer Comments

On-time performance and on-board ride times were major concerns of riders who were contacted in advance of the review. Two of the three riders contacted in advance of the on-site review reported that both pickups and drop-offs were often late, and both estimated that the majority of their trips were late. One of the two also said that drop-offs are often very early, because pickups sometimes have to be made two or more hours in advance. The third indicated that pickups and drop-offs were “mostly on time,” but could sometimes be 30–45 minutes late.

All three riders reported dissatisfaction with on-board ride times and said that d they were very often unreasonably long. One person mentioned frequent rides of 2 to 2-1/2 hours. The second gave an example of a trip that was 10 miles and took over 2 hours. One said she understood that the service was shared-ride, but said that too many passengers were placed in a single van, which was unreasonable and “not fair shared-rides.” Two of the three also mentioned that routing is very circuitous with deviations far out of the way to pick up and drop off other riders.

Similar concerns were expressed at the CFADAR meeting. Eight of the participants offered estimates of the percentage of time that trips were late. Six of them said trips were late 40–60 percent of the time. One said that trips were “mostly late.” Another said that pickups were “mostly okay, but drop-offs are often late.” Several riders also mentioned that both pickups and drop-offs were often early.

There was general agreement at the CFADAR meeting that ride times were excessively long. Examples of rides of 2 hours or more were given. One person said that ride times from outlying areas were particularly long. Another said that ride times are much better if trips are sent to the backup taxi subcontractors.

Taxi no-shows were raised as a concern at the CFADAR meeting. Two riders indicated that taxis sometimes don’t show up and the riders were marked as no-shows.

Late rides and long rides were mentioned in many of the complaints on file at DTS and OTS. Late rides accounted for 22 percent of the complaints received between July 28, 2009, and January 28, 2010. Long travel times accounted for 6 percent of all complaints during this period. A significant number of complaints were also received regarding the taxi subcontractors and no-shows. Eighteen percent of complaints were about trips provided by taxis, many about vehicles not showing up or rider being charged with a no-show. Another 6 percent of complaints were related to no-shows on Handi-Van vehicles.

The one formal complaint on file at FTA at the time of the review also mentioned vehicles not showing up as scheduled.

9.2 Service Standards and Policies

On-Time Performance Policies and Standards

DTS policy was to achieve an on-time performance rate of 95 percent. Trips were defined as on time if the vehicle arrives within a window of 0/+30 minutes of the scheduled pickup time for all trips. There is no performance standard for drop-offs.

No-Show and Missed Trip Definitions and Performance Standards

Under §37.125(h) (1) of the DOT ADA regulations, transit operators may establish an administrative process to suspend ADA paratransit service, for a reasonable amount of time, to eligible individuals who establish a pattern or practice" of missing scheduled trips. Trips missed by the individual beyond his or her control (including, but not limited to, trips which are missed due to operator error) shall not be a basis for determining that such a pattern or practice exists. Appendix D explains that "pattern or practice" involves, intentional, regular, or repeated actions, not isolated, accidental, or singular incidents. In particular, trips that are missed due to operator error are not attributable to the individual passenger for this purpose.

Page 24 of the *Rider's Guide* stated, "a 'no-show' occurs when":

> You are not at the requested pickup address and the Operator cannot locate you; or
>
> You are at the address where you requested to be picked up, but you are not ready to board the van within five (5) minutes of the arrival of an on-time van and the van has to depart; or
>
> You have not called to cancel your trip at least two (2) hours prior to pickup to allow for rerouting of the van to another location.

Section 9.01A of the *GP&P* defined and classified a missed trip occurring when a driver arrives "at a pickup location outside the 30-minute window from the schedule time and the customer is a no-show or cancel-at-door." If the rider is transported despite the late arrival, the trip is classified as a "missed trip and transported." The policy instructs drivers to verify the scheduled pickup time, 30-minute window, and location with dispatch so this information can be properly recorded.

Travel Time Policies and Standards

Based on the information DTS provided before the on-site review, DTS defined trips of excessive duration as trip lengths that exceed 1.5 times the ride time of an equivalent fixed route trip, including the estimated travel time to and from the bus stop. At the time of the review, no

goal for the percentage of trips that meet this standard had been developed, although DTS and OTS stated during the on-site review that they were working to identify such a goal.

9.3 Scheduling and Dispatching Procedures and Observations

Scheduling Procedures and Staffing

As mentioned in Section 8 of this report, at the time of the review, OTS used the Trapeze system to book, schedule, and dispatch trips. Because of the capacity issues on weekdays, reservationists left all weekday trips as unscheduled while taking trip requests, meaning that reservationists booked the trips into the Trapeze system without actually scheduling the trips onto runs. Reservationists used the software to schedule weekend trips. For Saturday and Sunday trips, reservationists allowed Trapeze to place some trips directly onto runs, in part to test the software and measure the impact of changing to "real-time scheduling" for all trips. OTS Managers stated that they were considering moving to "real-time scheduling" for all trips and that these weekend tests were informing their decision.

At the time of the on-site review, OTS employed three schedulers. A fourth scheduler position was vacant. The three schedulers worked overlapping shifts with the first starting at 11 a.m., the second at noon, and the third at 1 p.m. each day.

Since the vast majority of all trips were left unscheduled by reservationists—including all weekday trips and some weekend trips—the schedulers' primary function was to place these trips onto vehicle runs. Each scheduler assumed responsibility for handling trips during a set portion of the day based on requested pickup times: 5 a.m. to 9:30 a.m., 10 a.m. to 1 p.m., and all trips with pickup times after 2 p.m.

Scheduling was based on a highly organized run structure. As mentioned in Section 8, a set of 33 "trip-time matrices" determined when pickups could be offered in various parts of the island. Typically, pickups were offered every hour on the hour in more populated areas of the island. Less frequent pickups were provided in outlying, less populated areas and for longer trips that crossed the island. Samples of the matrices that had been created are provided in Attachment E.

Schedulers started certain vehicles in each area of the island and had them travel in pre-determined directions, according to the trip-time matrices. This was largely the case in the morning and afternoon, when there were more subscription trips. During the middle of the day, schedulers stated that some runs might not travel in pre-determined directions in order to respond to non-subscription (demand) trips.

Each scheduler tried to complete their set portion of pickups for the day with vehicles in the correct areas for the next setoff pickups For example, the scheduler who handled morning trips with pickups from 5–9:30 a.m. tried to leave vehicles in the locations where the next scheduler anticipated them to be when starting to create the 10 a.m. to 1 p.m. pickups and runs.

Each scheduler had their own approach for placing unscheduled trips onto runs, but in general the approaches involved organizing trips by time of day and location and then pulling all trips for similar times in similar areas and organizing them into runs. For example, the scheduler handling 5 a.m. to 9:30 a.m. pickups might have 20 trips with 6 a.m. pickup times in one part of the island.

If two vehicles were anticipated for that area, she would place approximately 10 trips each on each vehicle and would order the pickups in sequence.

OTS stated that it had developed some backup taxi capacity to accommodate short trips by ambulatory riders, or trips that went "against the grain" and might not be able to be accommodated on Handi-Van vehicles. This back- up capacity was available to the three schedulers as they created runs and schedules throughout the day.

OTS stated that, given the highly organized run structure, scheduler knowledge of the planned flow of vehicles throughout the day was critical. The scheduling software can help find solutions for some trips that are difficult to-place trips, but most scheduling was done manually. It was mentioned that schedulers typically started as reservationists, then moved to dispatching, and finally progressed to become schedulers.

To determine whether reasonable and feasible schedules were being created, the review team sat with the schedulers at the end of the day on Tuesday, January 26 and reviewed several of the schedules created for the next day. This review showed that in many cases the schedules being created were overly tight and sometimes not realistic. A quick scan of the schedules for Wednesday, January 27 identified at least 33 schedules that likely could not be performed on-time. Nine examples are included in Attachment F. Some of the issues identified on these schedules are detailed below.

Schedule A, Run 15210: This run had 12 pickups (all at 6:00 a.m.) in the Kapolei and Makalilo areas. These 12 passengers were scheduled to be dropped off from 7:15–8:15 a.m. in Waimalu, Mapunapuna, Nuuanu, and Kakaako. Even with minimal travel and pickup time assumed, the Trapeze system estimated that the 12 pickups would not be completed until approximately 7:32 a.m., meaning that some of the pickups would happen as much as 90 minutes after the pickup time and the drop-offs would not happen until between 8:16 and 9:20 a.m., an hour or more after the appointment times.

Schedule B, Run 12100: 12 pickups scheduled in the Pearl City area from 7:00–7:15 a.m. Trapeze estimated that these would not be completed until 8:27 a.m., which would make every 8:00–8:30 a.m. drop-off late (some over 90 minutes late). Also, to allow the pickups to start at 7:00 a.m., one rider who had a 7:00 a.m. appointment was picked-up at 5:05 a.m. and was scheduled to be dropped off at 5:29 a.m., 91 minutes before his appointment time.

Schedule C, Run 13100: 13 pickups scheduled from 5:50–6:00 a.m. Trapeze estimated these pickups would not be completed until 7:11 a.m., making most of the 7:30–9:00 a.m. drop-offs late and some over an hour late.

Schedule D, Run 14500: Nine pickups scheduled from 6:55–7:10 a.m. Trapeze estimated these pickups would be completed by 8:18 a.m., making most of the 8:15–9:30 drop-offs late and one 69 minutes late.

Schedule E, Run 16610: 11 pickups scheduled at 7 a.m. that Trapeze estimated would not be completed until 8:14 a.m., making 10 of the 8:15–9:00 a.m. drop-offs late and one 66 minutes late.

Schedule F, Run 17510: 10 pickups scheduled from 8–8:20 a.m. that Trapeze estimated would be completed at 9:18 a.m., making all drop-offs late and one 74 minutes late.

Schedule G, Run 21400: Seven scheduled 1 p.m. pickups dropped off from 2:30–3:00 p.m. that Trapeze estimated would not be completed until 3:39 p.m., making three 4 p.m. pickups over an hour late and one 4:00 p.m. drop-off 57 minutes late.

Schedule H, Run 16820: Six pickups scheduled for 3:30 p.m. not estimated to start until 4:14 p.m. (44 minutes late) that Trapeze estimated would not be completed until 4:24 p.m.

Schedule I, Run 16620: Eight 4 p.m. pickups estimated to begin at 4:30 p.m. and not completed until 4:57 p.m. due to the demands of an earlier schedule.

This review of runs from one day indicated that in order to accommodate all of the trip requests received, OTS was overloading some of runs and that trips were being scheduled to be late from the start.

The examples in Attachment F also show that insufficient time was provided between pickups and drop-offs. Many schedules did not appear to allow for the 5-minute vehicle wait time and instead expected that riders would appear and board immediately. Also, the schedules did not include slack time to allow for traffic, delays in boarding, or same-day-service issues.

All three schedulers acknowledged that, in order to accommodate all trip requests, it was necessary to create schedules that they knew would probably not be completed on time. All three indicated that more capacity was needed to allow feasible schedules to be created. The morning scheduler said that she had 53 “straight” and 49 “split” runs to work with and that she needed at least 10 more runs for morning trips. The mid-day scheduler said that he needed at least 10–15 more runs. The afternoon/evening scheduler said that she also needed at least 10–15 more runs to be able to create more feasible schedules.

Schedulers also stated that while they tried to list trips on the schedule in a logical pickup sequence, sometimes, though, they just grouped the trips in the same areas together and left it to drivers to determine the best sequence for pickups. They stated that on many runs, riders are regulars and drivers have worked out the pickup sequence that seems to work best for them and the riders.

Even though the schedulers created some runs with overly tight schedules that they acknowledged could not be completed on-time, the review team observed that even then some trips remained unscheduled going into the day of service. Dispatchers same-day scheduled and placed these trips on runs as cancellations occurred or assigned the trips to subcontractors. On weekdays, between 55 and 95 trips typically remained unscheduled going into the day of service: approximately 20–25 trips between 5 and 9:30 a.m.; approximately 20–50 trips between 10 a.m. and 1 p.m.; and another 15–20 trips after 2 p.m.

Considerations for Change to “Real-Time Scheduling”

At the time of the review, DTS and OTS managers were considering changing the way that Handi-Van trips were scheduled to more fully utilize the Trapeze scheduling capabilities to allow reservationists to place trips directly onto runs. At the time of the on-site review, weekend tests were underway.

After reviewing the current trip-booking and scheduling processes, the review team made several observations regarding this planned change. First, the “trip-time matrices did not meet the DOT ADA requirements. The matrices did not allow all trips to be accommodated within an hour of the requested pickup time.

Second, in an attempt to meet all the demand at the time of the review, it seemed clear that schedules were being overloaded, resulting in late pickups, late drop-offs and excessively long travel times.

One approach for meeting the ADA requirements would be to move to "real-time scheduling" and allow the Trapeze system to schedule trips within an hour of the requested times as required by the DOT ADA regulations and in a way that would allow for on-time service.

In order to schedule trips so that they can be performed on time and with comparable travel times, it is likely that less grouping of trips will be possible. As a result, it is possible that significant additional capacity will be needed as the move to "real time scheduling" is carried out.

In addition to adding capacity, DTS and OTS should consider the following when planning the move to "real-time scheduling":

- The success of "real-time scheduling" might be enhanced with additional training for reservationists. If the run structure at the time of the review is replicated in the Trapeze system, reservationists will need to fully understand the run structure in order to make appropriate assignments of trips to runs.
- If "real-time scheduling" is implemented, it may be beneficial to direct schedulers to review and clean up runs 3 to 4 days in advance of the day of service. This review well in advance of the day of service might allow trips to be organized more efficiently throughout the island) which might then allow reservationists to add subsequent trips more efficiently.
- "Real-time scheduling" likely will likely increase the time needed to book reservations. Rather than just entering pickup trips as requested, reservationists will query the system for trip assignments and reviewing them as they are returned by the system. The number of reservationists needed to maintain reasonable telephone hold times could increase.

Dispatch Staffing and Procedures

At the time of the on-site review, OTS employed nine full-time dispatchers and one part-time dispatcher for Handi-Van service. This allowed four dispatchers to be on duty during weekday peak operating hours with two to three dispatchers on duty at other times.

Service records indicated that approximately 160 runs are scheduled on weekdays. During peak hours, 120–130 vehicles are in service. This meant that, during peak times, there was a ratio of 30–32 runs per dispatcher.

Dispatchers were interviewed and the dispatch operation was observed for several hours on January 26–28, 2010. The dispatchers did not divide the work by certain vehicles. Instead, all dispatchers were available to handle issues with any vehicles and runs, and queries and issues were directed to the first available dispatcher.

Dispatchers identified the following as major tasks throughout the day:

- The major task was placing any unscheduled trips on runs. As mentioned above, approximately 55–95 trips remained unscheduled going into each weekday of service. This number could grow if drivers called out unexpectedly, pulled out late some or all trips on runs have to be assigned to other runs and if there were no-shows or same-day changes to trips. Throughout the day, dispatchers stated they worked to place any

unscheduled trips onto runs far enough in advance to allow them to be performed on time.

- Second, dispatchers handled any same-day issues and requests for assistance from drivers including: incidents, accidents no-shows, and requests for directions.
- Third, dispatchers stated that they spend time responding to WMR calls. As mentioned above, the WMR agents handled these inquiries whenever possible. If vehicles were running late, though, WMR agents typically asked dispatchers for an update that could be relayed to riders.
- Next, dispatchers handled any requests from riders for same-day trip changes, early pick-up requests or same-day trip requests. Typically, reservationists received same-day-trip requests, but then had to check with dispatch to see if the request could be accommodated.
- Dispatchers also signed drivers in and out at the beginning and end of each shift. At major pull-in and pullout times, this can required a good deal of dispatcher time.

Firsthand observations indicated that dispatchers did not proactively scan runs to identify potential late trips. Instead, they appeared to rely on riders calling to report that pickups were late or drivers reporting that they were running behind. Once they learn that a run is operating behind schedule, they then examine options to reassign trips to other available runs. Instead of using the "Dispatch" screen in the Trapeze system which is designed for proactive dispatching and lists all trips and runs projected to be late dispatchers work almost exclusively in "Schedule Editor" mode, which is used more for addressing individual run issues.

Dispatchers also stated that, because drivers often rearrange their runs to perform trips in the order they think worked best, it was difficult for dispatchers to be proactive. If a driver made pickups in a sequence that is different from what was scheduled, the system may show the trips and run as late or potentially late when in fact it may be on time.

Even though drivers may rearrange pickups and drop-offs, it can still be possible for dispatchers to proactively identify runs that are behind schedule, if they remain in regular contact with drivers. By the time riders call and report a trip as late or drivers radio in to request assistance, it likely is too late to reassign the trips so they can be performed on time.

Dispatchers also indicated that during peak periods they were sometimes unable to reassign trips that were running behind because all vehicles in the system were so tightly scheduled. Options were often not available to reassigning trips to runs where riders could be picked up sooner.

Dispatchers also stated that they spent time each day manually gathering actual pickup and drop-off times from drivers who reported non-functioning mobile data terminals (MDTs). If dispatchers notice that actual times are not up-to-date in the system, they ask a driver via radio to provide the missing times. This could sometimes consume a significant portion of a dispatcher's time.

For no-shows, the adopted procedure was for drivers to wait a minimum of 5 minutes within the 30-minute pickup window before requesting that a rider be declared a no-show. For vehicles with functioning MDTs, the driver was directed to press a button to indicate they had arrived at the pickup address, which initiated a 5-minute countdown timer. If the rider did not appear within 5 minutes, the driver was to report this to dispatch to obtain authorization to depart before leaving the pickup location. When alerted to possible no-shows, dispatchers were to double-

check to make sure drivers have waited at least 5 minutes within the window. When the MDT was functioning properly, an early departure was also recorded in the MDT.

Dispatcher stated that, if time permitted, they tried to call riders to alert them that the vehicle was waiting. Dispatchers stated that most drivers notified them before leaving pickup locations "about 95 percent of the time" and that "most of the time" they attempt to call riders. .

Dispatchers and WMR agents also raised issues about no-shows for trips assigned to taxis. When a rider did not appear for a pickup, the adopted procedure was for the taxi dispatcher to call the WMR line. The WMR agents checked to see if the time of the call was at least 5 minutes after the scheduled pickup time. If 5 minutes had elapsed, they stated they assumed that the driver had waited the minimum 5 minutes before departing and the driver had arrived within the pickup window. Because WMR agents had no direct communication with the taxi driver, it was not possible for them to verify whether the driver arrived at the correct location within the pickup window and waited the minimum five minutes.

Dispatchers stated that they spent a "significant" amount of time following up when trips assigned to taxis are no-shows. If riders subsequently call for the ride and state that the trip was missed, dispatchers then have to arrange another option to serve the trip.

According to WMR agents, a potential problem with taxi trips is that some riders are expecting a Handi-Van vehicle rather than a taxi. Approximately "50 percent of the time," the rider is not told the vehicle will be a taxicab.

9.4 Driver Interviews

During the on-site review, the review team interviewed 11 Handi-Van drivers. This sample included a mix of long-term and newer drivers. Six drivers had more than 10 years' experience, two stated they had between one and ten years of experience, and three had less than one year of experience.

Questions covered:

- Whether the schedules they were expected to perform were feasible
- How often they ran late, and whether they found it necessary to run early to stay on time
- Whether times on the manifests were consistent with times reported by riders
- Level of dispatch support provided
- Their understanding of operating procedures, particularly the on-time performance window, no-show procedures, and rider assistance policies

Ten of the 11 drivers commented on the schedules. Six stated that the schedules were often too tight. One said it was "impossible to make all pickups in the 30–minute window." Another said he tries to talk to dispatch to have the schedules adjusted before he goes out. Another said "It is what it is and there is no sense in complaining." Three of the 10 drivers said the schedules varied, with some okay and some too tight. One of these three said the schedules could sometimes work if he was able to start making pickups early. The tenth driver said the schedules were "very reasonable."

Drivers were asked how often they ran late outside the 30–minute on-time window. Ten drivers responded to this question and the responses were similar to the responses on the schedules. Five drivers mentioned that they were late fairly often, one said "Quite a lot," another said four of 13

trips typically on her run were late, one said “Two runs a day,” another said “Several times a week,” and the fifth said “At least twice each day.” The remaining five drivers indicated fewer late pickups. One said “A lot in the past, but it has gotten better,” another said “Not often as long as I start early,” one said “Rarely but sometimes 20 minutes late,” one said “One or two a week—not very often,” and the last said “Not often.”

When asked about dispatcher assistance they receive on late trips, the review team received ten mostly favorable responses. Three said dispatchers do typically help, with one saying it was important to let them know in advance that help was needed, and a second saying “It is all in how you approach the dispatchers.” The other seven drivers said that dispatchers sometimes help, with responses including “They will try,” “Will help if they can,” “Sometimes ask you to do the best you can,” “Some help—depends on the dispatcher,” and sometimes just do the best you can.” One driver said that if the late trip was for one of the regular daily riders on the run, dispatchers typically just let the driver manage it. If the rider was not a regular rider, they were more likely to help and move it to another run. One driver also said that it sometimes takes a long time to get through on the radio, so he sometimes just manages the best he can rather than ask for assistance.

Most drivers were very familiar with the key operating policies and procedures. Nine of the 11 understood the 30-minute pickup window to define what was “on time.” However, two drivers had a different understanding of what was on time. One said “8:30–8:45 for a 9:00 pickup,” and the second said “No more than 10 minutes past the scheduled time.” One of these drivers had more than 10 years of experience and the other was new, with less than one year of experience.

All 11 drivers appeared to know the correct procedures for no-shows: pressing the button on the MDT to start the countdown timer, waiting at least 5 minutes within the window and then getting dispatch approval before leaving. Three drivers indicated that they did not always do this. One driver said, “It takes a while to get through to dispatch and I sometimes just leave.” The second said, “I will go see if I can help them and will then leave.” The third said, “Sometimes I just move on. I don’t have time to wait.” Two drivers also stated that before contacting dispatch they would try to call the rider using their cell phones.

Nine of the 11 drivers interviewed stated that they provide assistance beyond the curb, even though the policy is that the service is curb-to-curb. Two said they did not. One of the drivers who said he did not go beyond the curb said “We’re a mobile bus stop. If I do, it creates problems for other drivers who don’t.” The second said something similar: “I sometimes suggest they get a PCA. I worry about screwing it up for other drivers.” One of the drivers who said she did provide assistance beyond the curb said “I don’t understand the policy that you are not supposed to go to the door.”

When asked if they needed to run early to stay on time, 10 of the 11 drivers said “Yes,” and one said “It depends on the time of day.” Several drivers indicated that regular passengers know they need to be ready to go early to allow all riders to be picked up on time. One said “we work as a team.” Two drivers said that if they get to a location early and the passenger is not ready, they go to the next pickup and then come back later for the passenger who wasn’t ready early. Several drivers also indicated that they “know which passengers will be ready early.”

Mixed responses were received to the question about whether times on the manifests were sometimes different from what riders said they were given. Ten of the 11 drivers responded to this question. Five said that it does happen, with three of these saying it was “sometimes” or

"once in a while," and two saying it was more frequent ("three times a week"). The other five drivers said it either didn't happen or that it happened only very rarely. Those who indicated that times were sometimes different indicated that the differences were typically one hour.

Drivers were also asked about the accuracy of information on the manifests about special pickup instructions or rider needs. Ten of the 11 drivers said "Yes" or "Mostly." Of these ten, one driver said the information was good for trips originally scheduled to a run, but could be incomplete for add-ons. A second said it was good except for some locations and mentioned military bases as particularly difficult locations on which to get accurate information. One third said more information about whether riders could be left unattended was needed. One of the 10 drivers was not happy with the accuracy of the instructions and cited an example where a rider was listed as using a walker but showed up using a wheelchair.

Finally, at the end of the interviews, drivers were asked about "other issues". Comments related to scheduling and dispatching included:

- "Need more vehicles" (two drivers)
- "Some vehicles (26s, 27s, 28s) don't have enough interior room to maneuver riders using wheelchairs. Have to pick people up in the reverse order they will be dropped off, which sometimes requires making pickups in a more circuitous and less efficient way."
- "The notes on the manifests could be more detailed."
- "With switchover to MDTs, no longer doing all-calls to see if there are drivers in the area who might be able to help out. Used to do this with the radios, but stopped, and would like to see this done again."
- "Need more communication and a better working relationship between management and drivers."
- "There is sometimes a lack of consistency in the way policies are implemented."
- "Need more rider education of what the policies are."

9.5 On-Time Performance

The drivers used MDTs to record their arrival and departure times at the pickup and drop-off locations. DTS used Trapeze software to compute the on-time performance by comparing the scheduled pickup time with the actual pickup time and the appointment time with the drop-off time. Table 9.1 presents the computed on-time performance from the software reports for July to December 2009. As shown, on-time performance averaged 85.6 percent for the period, which was well below the DTS standard of 95 percent.

Table 9.1 – DTS Computation of On-Time Performance for Pickups

Month (2009)	Pickups	Early		Late		On-Time (in window/ early)
		Number	Percent	Number	Percent	
July	62,157	18,393	29.6%	7,779	12.5%	87.5%
August	60,210	17,420	28.9%	8,337	13.8%	86.2%
September	61,356	15,611	25.4%	9,792	16.0%	84.0%
October	63,075	15,889	25.2%	10,143	16.1%	83.9%
November	58,191	15,509	26.7%	8,562	14.7%	85.3%
December	62,501	17,994	28.8%	8,448	13.5%	86.5%

Average	**61,248**	**16,803**	**27.4%**	**8,844**	**14.4%**	**85.6%**

Table 9.2 presents the on-time performance data for July to December 2009 for drop-offs. The performance is measured for those trips with scheduled appointment times. As shown, on-time performance averaged just below 80 percent for the 6-month period.

Table 9.2 – DTS Computation of On-Time Performance for Drop-offs

Month (2009)	Trips with Appointments	Late Drop-offs	On Time
July	43,899	7,902	82.0%
August	42,211	8,429	80.0%
September	42,759	9,235	78.4%
October	45,923	9,809	78.6%
November	41,424	9,206	77.8%
December	42,988	8,807	79.5%
Average	**43,202**	**8,898**	**79.4%**

Calculated On-Time Performance for Sample Day

In order to develop an independent estimate of on-time performance, the review team evaluated a sample of Handi-Van trips completed on Wednesday, December 9, 2009: a day that that did not feature any unusual events to make the day's performance atypical. Using hard copies of the driver manifests, the review team sampled 152 trips by taking every 15th completed trip and recording whether the trip was demand or subscription, the scheduled time, appointment time, arrival and departure at the pickup point and arrival time at drop-off.

As shown in Table 9.3, DTS was on time in the pickup window for 52.0 percent of the sampled trips. If one also includes the pickups performed prior to the window, then DTS was on time or early for 96.7 percent of the sampled trips.

Table 9.3 – On-Time Pickup Performance: December 9, 2009

		Trips	Percentage
Sample		152	100.0
Pickups in Window (0–30 minutes after negotiated time)		79	52.0
Pickups in Window or Early		147	96.7
All Early Pickups		68	44.7
	1–15 minutes	50	32.9
	16–30 minutes	11	7.2
All Late Pickups		6	4.0
	1–15 minutes	5	3.3

There were inconsistencies between the data provided in the computer-generated reports provided by DTS and OTS and the review team's analysis of the sample data. The review team's analysis showed a much higher percentage age of early pickups and a much lower percentage of late pickups after the 30–minute window. As shown in Table 9.4, 44.7 percent of the scheduled pickups in the sample were early arrivals compared to approximately 27 percent in the Trapeze data. Further, only 3.9 percent of the sample pickups arrived outside of the 30-minute window versus 14.4 percent in the Trapeze reports. It appeared that the percentage of early arrivals was higher for subscription trips, which was supported by the information obtained in the driver interviews. Some of the interviewed drivers mentioned that in order to stay on time, they arrive early and that their "regulars" are accustomed to this and are usually ready to go.

Table 9.4 – Comparison of Sample, Daily, and Monthly On-Time Performance for Scheduled Pickups

		Early		Late	
Scheduled Pickups	**Trips**	**Number**	**Percent**	**Number**	**Percent**
December 9, 2009, Report	2,689	714	26.6%	421	15.7%
Sample	152	68	44.7%	6	3.9%
July-Dec Monthly Average	**61,248**	**16,803**	**27.4%**	**8,844**	**14.4%**

For on-time drop-off performance, the analysis compared the arrival times of trips with appointments with the scheduled appointment time, as shown in Table 9.5. Of the trips with appointment times, 76.4 percent of the drop-offs were made before the appointment time with 23.6 percent of the drop-offs took place after the appointment time, of which 13.4 percent were more than 15 minutes late. This is poor performance: a quarter of trips with requested drop-offs are late; one of every seven trips with requested drop-offs are more than 15 minutes late. The results from the sample were consistent with the Trapeze reports.

Table 9.5 – On-Time Drop-off Performance: December 9, 2009

		Number	%
Sample		89	100.0
All Early Drop-offs		68	76.4
	1–15 minutes	12	13.5
	16–30 minutes	12	13.5
	> 30 minutes	44	49.4
All Late Drop-offs		21	23.6
	1–15 minutes	9	10.1
	16–30 minutes	6	6.7
	> 30 minutes	6	6.7

Table 9.5 also shows that 49.4 percent of the drop-offs were more than 30 minutes early. As discussed previously, use of the scheduling matrices appeared to contribute to very early drop-offs since pick-up times may have been scheduled well in advance of stated appointment times.

9.6 No-Shows and Late Cancellations

Handi-Van Service

The review team obtained reports for the 393 trips provided by Handi-Van trips that were coded as no-shows for December 1–9, 2009. Of the 393 no-shows reported, approximately half were correctly coded. Of the remaining half, approximately 40 percent lacked sufficient information in "Tracker Notes "to enable the review team to determine the accuracy of the coding, 4.5 percent should have been coded as missed trips in other words, the driver arrived more than 30 minutes late, and 5.6 percent indicated that the vehicle left prior to the end of the 5-minute waiting period. Additional efforts are needed to ensure that when trips are not taken because the vehicle arrived late, these trips are correctly coded as "missed" instead of as "no-shows". More complete information on no-shows should be kept in the system, particularly in tracker notes, to indicate if there was contact between the driver and dispatch prior to the driver leaving before the 5-minute waiting period elapsed.

DTS Subcontractors

At the time of the review, in an effort to address increasing demand and to better manage costs for certain trips, OTS had contracted with two taxicab companies for supplemental capacity and anticipated adding two more subcontractors. These subcontractors were assigned trips either when the trips could not be accommodated on Handi-Van runs, or when it was more efficient to have them performed separately. To measure the accuracy of no-show coding by subcontractors, the review team obtained data on trips provided on a sample day (December 9, 2009) by Signature Cab, one of the subcontractors, covering 159 trips. From this list, eight additional trips were not completed and were coded as cancelled trips with no additional information regarding whether these were in fact no-shows, whether the cab driver waited a full 5 minutes before departing, or whether the driver had any communication with dispatch. Similarly, there was no information as to whether the cab company dispatcher communicated with OTS dispatch to try to locate the rider.

The review team discussed the procedures for handling taxi no-shows with OTS WMR agents and dispatchers. As mentioned earlier, because they were not communicating directly with the drivers, it was difficult for WMR agents to determine exactly when the vehicle arrived or to check to make sure it is at the correct location. As a result, they typically just approved the no-show as long as the time of the call from the taxi dispatcher was 5 or more minutes after the scheduled pickup time. This was a concern for both WMR agents and dispatchers because they did not feel that they had enough control in terms of verifying that the taxis were at the pickup location at the scheduled time. They also expressed concern that because the taxi companies and drivers received payment for no-shows, this might be an incentive to sometimes misrepresent a trip as a no-show.

Subcontractors invoiced DTS each month for no-shows, billing $10.00 to 20.00 per no-show. In December 2009, this amounted to $4,720.00. At the time of the review, there was no straightforward method to audit the accuracy of the no-show report in a way that correlated with the Trapeze data. Trip and service records were maintained separately from billing records and there was no way to link them. Because a growing portion of the ADA complementary paratransit service was being sent to taxicab subcontractors at the time of the review, it is important for DTS and OTS to monitor the on-time performance of contractors and subcontractors and to verify the recording of no-shows and missed trips.

9.7 Analysis of On-Board Ride Times

Among the examples of prohibited capacity constraints included in §37.131(f) are “substantial numbers of trips with excessive trip lengths” (§37.131(f)(3)(i)(C)). Since paratransit is a shared-ride service, trips between Point A and Point B will usually take longer than a taxi ride between the same points, and involve more intermediate stops. However, when the number of intermediate stops and the total trip time grows so large as to make use of the system prohibitively inconvenient, a capacity constraint could exist. Generally, total transit time aboard paratransit should be comparable to the same trip taken on the fixed-route system, after accounting for any transfers for multi-route trips, waiting time at each end of the trip, and travel to and from the bus stop.

The review team calculated travel times for the sample of 152 trips provided on December 9, 2009, for which the on-time performance analysis was conducted.

Table 9.6 shows the distribution of travel time for those trips, as determined by pickup and drop-off times recorded on driver manifests. The average (mean) travel time for trips in this sample was 49 minutes.

Table 9.6 – On-board Travel Times for Selected Trips Provided on December 9, 2009

On-board Travel Time	Trips	Percent
Up to 15 minutes	25	16.4%
16–30 minutes	35	23.0%
31–45 minutes	25	16.4%
46–60 minutes	26	17.1%
61–90 minutes	27	17.8%
91–120 minutes	5	3.3%
Over 120 minutes	9	5.9%
Total	**152**	**100%**

From this list, the review team created a sample of 30 trips with long travel times (greater than 60 minutes) for further analysis. Trip information was obtained from either Trapeze reports or from handwritten driver manifests. The review team used the public transit trip planner available on Google Maps to develop 28 fixed route itineraries for the sample trips. Each estimate of fixed route travel time included:

- Travel time on each bus route
- Transfers (waiting time) for multi-route trips
- Walking time at each end of the trip, as estimated by the Google trip planner

Handi-Van travel times were calculated using the actual departure time from the pickup location and arrival at the drop-off location as recorded on the driver manifests. The list of long trips generated by Trapeze showed only the arrival times and not departure times at the pickup and drop-off locations.

For two of the 30 trips in the sample, no fixed route itineraries could be generated using the Google transit trip planner, leaving 28 in the sample. Table 9.7 below shows the results of the travel time comparison between Handi-Van and TheBus using 28 fixed route itineraries. For each Handi-Van trip, the table shows the origin and destination (addresses are rounded to the nearest 100 block to maintain confidentiality), the actual departure time from the pickup location and arrival at the drop-off location as recorded on the driver manifests, and the actual total paratransit travel time. The table then shows TheBus routes that would be used to connect the same origin and destination, the number of transfers involved, a calculation of travel time on board TheBus, an estimate of walking time to the bus stops, and a calculation of total fixed route travel time.

Twenty-two of the 28 trips, or 79 percent, had Handi-Van travel times that were longer than the comparable travel time on TheBus. The differences in travel time between Handi-Van and TheBus services ranged from 8–62 minutes, with an average of 42 minutes. The remaining six Handi-Van trips, or 21 percent, would have taken more travel time using TheBus, a difference that ranged from 4–67 minutes, with an average of 26 minutes.

Seventeen of the Handi-Van trips, or 61 percent, were longer than the comparable TheBus trip by 20 minutes or more. FTA considers ADA paratransit trip length to be comparable to fixed route where paratransit ravel times do not exceed the fixed route travel time by more than 20 minutes. An analysis of a sample of 152 Handi-Van trips completed on December 9 indicated that approximately 27 percent of trips had travel times that were over 60 minutes. Extrapolating to the full sample day indicates that 16.5 percent of all Handi-Van trips have long travel times that are not comparable to the travel time for a similar trip on the TheBus. This proportion of trips system-wide with long travel times constitutes a substantial number of trips with excessive trip lengths.

The final two columns of Table 9.7 compare the travel times via Handi-Van with TheBus. The Travel Time Difference column presents the difference in travel times between the two modes; a minus sign (–) indicates that Handi-Van travel time was shorter than the estimated fixed route travel time.

As shown in Table 9.7, 14 of the trips on TheBus involved no transfers, 12 trips required one transfer, and two trips required two transfers.

Table 9.7 – Comparison of Travel Times on Handi-Van ADA Complementary Paratransit Service vs. Fixed Route for Selected Trips, December 9, 2009

Handi-Van Trip		Handi-Van Travel Time		Fixed Route Equivalent						
Trip No.	Pickup/Drop-off Address (rounded to 100 block)	Actual PU/DO Times	Actual Ride Time (mins)	Itinerary (routes/ transfers)	Start/ End Times	Ride Time (mins)	Walk/ Wait Time	Total FR Travel Time	Paratransit Travel Time - FR Travel Time (mins)	Travel Time Ratio Para/Fixed Route
1	980300 Ponokaulike Street, Aiea 570100 Kamehameha Highway, Kahuku	8:40 a.m. 9:57 a.m.	77	Route 54 Route 55 1 transfer	8:08 a.m. 10:25 a.m.	126	18	144	–67	53%
2	1800 Pikea Street, Foster Village 4000 Diamond Head Road, Diamond Head	7:31 a.m. 8:41 a.m.	70	Route 32 Route 3 1 transfer	7:51 a.m. 9:17 a.m.	80	17	97	–27	72%
3	66500 Paalaa Road, Haleiwa 100 Krukowski Road, Tripler Army Medical Center, Honolulu	8:01 a.m. 9:24 a.m.	83	Route 52 Route 31 1 transfer	8:25 a.m. 10:11 a.m.	79	30	109	–26	76%
4	800 Ilaniwai Street, Honolulu 840200 Water Street, Makaha	1:29 p.m. 3:10 p.m.	101	Route 6 Route C 1 transfer	1:15 p.m. 3:13 p.m.	101	24	125	–24	81%
5	911300 Renton Road, Ewa Beach 450400 Nihina Place, Kaneohe	1:28 p.m. 2:45 p.m.	77	Route E Route 55 1 transfer	1:54 p.m. 3:13 p.m.	65	19	84	–7	92%
6	910900 Haipu Place, Ewa Beach 2400 Ahakai Street, Pearl	3:07 p.m. 4:24 p.m.	77	Route 42 Route 53 1 transfer	3:09 p.m. 4:19 p.m.	64	17	81	–4	95%
7	870100 Nanaikeola Street, Nanakuli 700 Wilikina Drive, Wahiawa	3:30 p.m. 5:22 p.m.	112	Route 40A Route 62 Route 72 2 transfers	3:08 p.m. 4:48 p.m.	84	20	104	8	108%
8	2300 Apapa Street, Pearl City 1800 Bachelot Street, Liliha	5:41 a.m. 6:42 a.m.	61	Route 53 No transfers	5:05 a.m. 5:40 a.m.	35	16	51	10	120%

Handi-Van Trip		Handi-Van Travel Time		Fixed Route Equivalent						
Trip No.	Pickup/Drop-off Address (rounded to 100 block)	Actual PU/DO Times	Actual Ride Time (mins)	Itinerary (routes/ transfers)	Start/ End Times	Ride Time (mins)	Walk/ Wait Time	Total FR Travel Time	Paratransit Travel Time - FR Travel Time (mins)	Travel Time Ratio Para/Fixed Route
9	641500 Kamehmeha Highway, Helemano 981400 Kulawai Street, Aiea Heights	3:01 p.m. 4:32 p.m.	91	Route 62 Route 11 1 transfer	3:07 p.m. 4:06 p.m.	45	33	78	13	117%
10	99000 Moanalua Road, Aiea 91200 Kupiapia Place, Ewa Beach	3:46 p.m. 5:23 p.m.	97	Route 71 Route 42 1 transfer	3:54 p.m. 4:53 p.m.	48	35	83	14	117%
11	800 Kealahou Street, Hawaii Kai 200 N. School Street, Liliha	4:59 a.m. 6:28 a.m.	89	Route 23 Route 80 1 transfer	6:42 a.m. 7:32 a.m.	39	33	72	17	124%
12	921000 Luawainui Street, Makakilo 940300 Farrington Highway, Waipahu	7:13 a.m. 8:18 a.m.	65	Route 411 Route 40A 1 transfer	7:45 a.m. 8:11 a.m.	20	22	42	23	155%
13	1100 Luapele Drive, Salt Lake 1800 Bachelot Street, Liliha	6:09 a.m. 7:14 a.m.	65	Route 11 No transfers	6:15 a.m. 6:31 a.m.	16	18	34	31	191%
14	100 Ohai Street, Wahiawa 860100 Farrington Highway, Waianae	5:27 a.m. 7:36 a.m.	129	Route 62 Route 40A 1 transfer	5:51 a.m. 7:25 a.m.	89	9	98	31	132%
15	840200 Water Street, Makaha 2600 Kilihau Street, Mapunapuna	5:02 a.m. 7:05 a.m.	123	Route 93 Route 9 1 transfer	5:11 a.m. 6:32 a.m.	74	16	90	33	137%
16	100 Pauahi Street, Nuuanu 840400 Jade Street, Makaha	1:00 p.m. 3:12 p.m.	132	Route C No transfers	1:12 p.m. 2:41 p.m.	89	9	98	34	135%
17	300 Walker Avenue, Wahiawa 950700 Holani Street, Mililani	2:00 p.m. 3:08 p.m.	68	Route 52 No transfers	2:18 p.m. 2:34 p.m.	16	16	32	36	213%

Handi-Van Trip		Handi-Van Travel Time		Fixed Route Equivalent						
Trip No.	Pickup/Drop-off Address (rounded to 100 block)	Actual PU/DO Times	Actual Ride Time (mins)	Itinerary (routes/ transfers)	Start/ End Times	Ride Time (mins)	Walk/ Wait Time	Total FR Travel Time	Paratransit Travel Time - FR Travel Time (mins)	Travel Time Ratio Para/Fixed Route
18	3200 Hayden Street, Kapahulu 2600 Campus Road, Manoa	9:59 a.m. 11:15 a.m.	76	Route 4 No transfers	10:24 a.m. 10:44 a.m.	20	17	37	39	205%
19	1200 Pua Lane, Kalihi 1400 Leahia Street, Foster Village	3:31 p.m. 4:40 p.m.	69	Route 11 No transfers	3:10 p.m. 3:22 p.m.	12	18	30	39	230%
20	860080 Farrington Highway, Waianae 1100 Luapele Drive, Salt Lake	2:10 p.m. 4:35 p.m.	145	Route 40A No transfers	2:19 p.m. 3:42 p.m.	83	20	103	42	141%
21	850700 Farrington Highway, Waianae 1300 Punchbowl Street, Honolulu	7:42 a.m. 9:26 a.m.	104	Route 93 No transfers	7:05 a.m. 8:00 a.m.	55	6	61	43	170%
22	410300 Manawaiola Street, Waimanalo 4000 Diamond Head Road, Diamond Head	5:46 a.m. 7:29 a.m.	103	Route 57 No transfers	5:50 a.m. 6:38 a.m.	48	12	60	43	172%
23	200 N. Kuakini Street, Liliha 450200 Waikalua Road, Kaneohe	3:02 p.m. 4:47 p.m.	105	Route 55 No transfers	3:21 p.m. 3:49 p.m.	28	26	54	51	194%
24	2000 Uhu Street, Kalihi 700 Keeamoku Street, Ala Moana	9:12 a.m. 10:43 a.m.	91	Route A No transfers	9:06 a.m. 9:28 a.m.	22	12	34	57	268%
25	3800 Waialae Avenue, Kaimuki 64500 Kamehameha Highway, Helemano	4:41 a.m. 7:40 a.m.	179	Route 1 Route 62 1 transfer	4:44 a.m. 6:35 a.m.	92	24	116	63	154%
26	2700 Kuilei Street, Moiliili 1200 S. King Street, Honolulu	11:02 a.m. 12:30 p.m.	88	Route 1 No transfers	11:05 a.m. 11:16 a.m.	11	9	20	68	440%
27	910200 Peleiake Place, Kapolei 1800 Bachelot Street, Liliha	6:10 a.m. 8:18 a.m.	128	Route 102 No transfers	6:19 a.m. 6:59 a.m.	40	19	59	69	217%
28	941000 Lumialani Street, Waihapu 600 Lilani Avenue, Wahiawa	5:49 a.m. 9:00 a.m.	191	Route 62 No transfers	6:14 a.m. 6:35 a.m.	21	8	29	162	659%

The number of long trips and the fact that certain Handi-Van trips show repeatedly as having long ride times indicates that a pattern or practice of long on board travel times existed at the time of the review. Certain addresses appeared more than once in the sample of long travel times, including:

- Kokua Villa, Farr Highway, Waianae (adult day care center)
- Home and Community Service, Farrington Highway, Waipahu
- Goodwill Kilihau, Kilihau Street, Mapunapuna
- Lanakila Crafts, Bachelot Street, Liliha

The repetition of certain addresses in the sample of Handi-Van trips with long travel times indicates that some long travel times occur on regularly scheduled group trips to human service program locations, particularly for the customers who are picked up first in the morning and/or dropped off last in the afternoon.

In addition, some areas outside of downtown Honolulu appear repeatedly in the sample of trips with long travel times. Those areas include Ewa Beach, Kalihi, Kaneohe, Waianae, and Waipahu.

While OTS and DTS were trying to be efficient by filling vehicles on trips to program locations and to/from outlying areas to serve as many customers as possible, comparable travel times must not be sacrificed —for the sake of operational efficiency.

Table 9.7 also shows each paratransit travel time as a percentage of the corresponding fixed route travel time, which indicates whether the trip met the DTS maximum travel time standard for Handi-Van trips of 1.5 times the length of a similar trip on TheBus. In this sample of 28 trips, 13 trips (46 percent) exceeded the DTS standard. Several trips were two, four, or six times as long as the comparable fixed route trip.

9.8 Findings

1. At the time of the review, it appeared that DTS did not require OTS or subcontractors to regularly measure or report on-board travel time, and the extent to which DTS monitored performance of its contractors and subcontractors was unclear. Defining “trips of excessive duration” as “trip lengths that exceed 1.5 times the ride time of an equivalent fixed route trip, including the estimated travel time to and from the bus stop” did not provide for comparable Handi-Van travel times for some trips. To meet the requirement of §37.131(f)(3)(i)(C), DTS must monitor contractor and subcontractor performance to ensure that Handi-Van service is provided without substantial numbers of trips with excessive trip length. A revised standard for on board travel time is needed, as is a plan for monitoring the on-board time that Handi-Van riders experience. Such a plan should include requiring employees and contractors to collect, measure, and report accurate data regarding on-board time. As part of DTS’ response to this finding, please provide the requested information and revised performance standard to FTA.
2. At the time of the review, it appeared that DTS did not require OTS or subcontractors to regularly measure or report on time performance, and the frequency with which DTS monitored on-time performance of Handi-Van service was unclear. The computed average on-time performance for DTS ADA paratransit service for the six-month period prior to the

review was 85.6 percent, well below the DTS standard. For the sample day, DTS was on time for only 52.0 percent of the sampled trips. (If trips with pickups that occurred prior to the start of the pickup window are included, this increases to 96.7 percent; however, passengers cannot be compelled to begin their trips early and on-time performance should not be dependent upon a portion of substantially early pickups.) These on-time performance levels suggest the existence of a capacity constraint in violation of §37.131(3)(i)(A). DTS must develop a plan to review operational practices and identify ways to increase on-time performance for Handi-Van pickups, and adjust the sampling methodology to accurately reflect actual performance and include trips provided by taxi subcontractors. As part of DTS' response to this finding, FTA requests DTS' performance standards for its current contractors and subcontractors.

3. At the time of the review, DTS did not have a standard or window for on-time drop-offs for Handi-Van service. Of the trips with appointment times, 23.6 percent of the drop-offs took place after the appointment time, of which 13.4 percent (12) drop-offs were more than 15 minutes late. This represents poor performance, as nearly a quarter of all trips with requested drop-offs were late, and one in seven was more than 15 minutes late. DTS has an implicit obligation to get riders to appointments on time (not late) and an explicit obligation to monitor performance to insure that Handi-Van service is operated without any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons. Operational practices that cause riders to arrive late to appointments may discourage riders from using the service, which would constitute a capacity constraint prohibited by the DOT ADA regulations. DTS must develop an on-time standard or window for on time drop-offs to appointments; require contractors and subcontractors to track, measure review and report drop-off performance for all trips with a requested appointment time; and require contractors and subcontractors) to print the appointment times on driver manifests for all trips with a requested appointment time. As part of DTS' response to this finding, please provide copies of these standards and directives to FTA.
4. At the time of the review, DTS' no-show policy did not appear to make distinctions between no-shows that are within a rider's control, those due to circumstances beyond the rider's control, and those due to system error. DTS must revise the no-show suspension policy to include the following:

    - The wait time must not begin before the beginning of the pickup window provided to the rider. If a vehicle arrives early, the wait time must begin at the start of the pickup window, not at the time of the vehicle's arrival. If the vehicle arrives before or after the pickup window, the rider is under no obligation to board early or wait for a vehicle that is late.
    - No-shows that are not within the customer's control will not be counted against the rider.
    - The advance notice of the proposed suspension must be provided in writing and the number of days of advance-notice must be reasonable and must be specified.
    - Riders' frequency of use must be taken into account, to ensure that sanctions are imposed only for a pattern or practice of missing scheduled trips and not isolated accidental or singular incidents. Three no-shows in a 30-day period does not constitute a pattern or practice of missing scheduled trips.

- The length of the first and subsequent suspensions must be revised, as "not longer than one (1) month" and "not more than six months," respectively, are unreasonably long.
- The phrase "At the discretion of the Director of the Department of Transportation Services Hearing Officer" must be explained.
- Trips classified as a "missed trip and transported" will not be counted against the rider.

As part of DTS' response to this finding, please provide the requested information to FTA prior to making any revisions to the *Rider's Guide* and/or /the DTS *Rules and Regulations*. The policy must be revised to resolve this finding, even if DTS does not plan to reinstate the policy.

5. At the time of the review, DTS did not appear to have a written policy or procedure for employees, contractors and subcontractors to follow prior to declaring rider no-shows. Based on information the review team provided to FTA, the de facto procedure was for the driver to initiate a 5-minute countdown timer on the Mobile Data Terminal ("MDT") to indicate arrival at the pickup address. If the rider did not appear within 5 minutes, the driver was to report this failure to the dispatcher to obtain authorization to depart before leaving the pickup location. When alerted to possible no-shows, dispatchers were to double-check to make sure drivers had waited at least 5 minutes within the window. In practice, however, dispatchers stated that vehicle operators called in no-shows before they departed the pickup location about "about 95 percent of the time." Dispatchers stated that, if time permitted, they tried to call riders to alert them that the vehicle was waiting, and that "most of the time" they attempted to call riders. Approximately half of the no-shows analyzed by the review team were correctly coded; however, another 10 percent were incorrectly coded, and the remaining 40 percent lacked sufficient information to verify whether they had been correctly coded as no-shows. To meet the requirements of §37.125(h)(1) – (h)(3) of the DOT ADA regulations, a procedure for properly coding no-shows is required. Employees, contractors and subcontractors must be directed to code no-shows correctly and DTS must monitor and verify trip coding to ensure that proposed suspensions of service are warranted. As part of the response to this finding, please provide a copy of the procedure and the directive to FTA.
6. At the time of the review, there did not appear to be adequate procedures in place to verify that no-shows reported by taxi subcontractors were in fact no-shows. If a call was received from the subcontractor dispatcher at least 5 minutes after the scheduled pickup time, OTS agents appeared to assume that the vehicle arrived had arrived inside the pickup window and had waited the required 5 minutes. Based on observations at the time of the review, there was no attempt to verify that the vehicle was at the correct pickup location or locate the rider before the no-show was approved. As part of DTS' response to this finding, develop such a policy and provide a copy to FTA.

7. At the time of the review, DTS incorrectly defined a "missed trip" as either of the following:
   - The vehicle arrives late and the trip is not taken. These are coded as "NM" trips ("Trip Not Made").

- The vehicle arrives late (after the 30-minute window) and the trip is taken. These are coded as "MT" trips ("Missed Trip But Transported").

DTS must revise its definition of a missed trip to include any attempted pickup after the end of the pickup window that does not result in a passenger being transported, either due to the rider turning down or cancelling the trip, or the rider no longer being at the pickup location. If a vehicle does not arrive within the pickup window, the rider has no obligation to wait for the vehicle and is under no obligation to board the vehicle. If the rider elects to board a vehicle that arrives after the pickup window, that pickup must be counted as a late pickup. To meet the requirements of §37.125(h)(1)-(3) and §37.131(f)(3)(i)(B) of the DOT ADA regulations, DTS must operate Handi-Van without a substantial number of missed trips and must ensure that trips missed by DTS, OTS or subcontractors are not counted against the passenger. DTS must direct contractors and employees to code missed trips properly to ensure that riders are not experiencing a substantial number of trips missed due to transit system error and that such trips are not counted as no-shows against the rider. As part of DTS' response to this finding, please provide a copy of the directive to FTA. Please also report whether DTS has adopted a performance standard for missed trips that contractors and subcontractors are not to exceed.

8. To meet its obligations under §37.125(h)(3), DTS must establish an appeals process and make it available to an individual on whom sanctions have been proposed and submit the appeals policy to FTA. The policy must call for the sanction to be stayed pending the outcome of the appeal. The appeals process must meet the requirements of 37.125(g). As part of DTS' response to this finding, please provide the requested information to FTA.

9.9 Recommendations

1. Work to improve on-time performance within the pickup window.
2. Review a sample of trips each month and compute on-time pickup and drop-off performance and compare the results to those provided by contractor(s) and subcontractor(s).
3. Review scheduling practices at the time of the review which allowed between 55 and 95 weekday trips to remain unscheduled at the beginning of each service day. At the time of the review, the number of trips left to scheduler and the dispatcher created a burden for staff that may have contributed to decreased on-time performance.
4. Direct OTS to periodically analyze a random sample of the longest trips on Handi-Van service to determine if the ride times are comparable to fixed route travel times. . If the analysis indicates that ride times are not comparable, adjust scheduling and/or capacity. Monitor OTS performance. Calculate comparable Handi-Van ride times by starting with fixed route ride times, adding walking time to and from stops, waiting time plus any transfer times between routes. Handi-Van ride times should be similar to this estimated fixed route travel times, for example within 15 or 20 minutes of fixed route travel time. At the time of the review, for the sample day, seventeen of the Handi-Van trips, or 61 percent of trips in the sample, were longer than the comparable TheBus trip by 20 minutes or more. This proportion of trips system wide with long travel times constitutes a substantial number of trips with excessive trip lengths. When the actual travel times of 28 long Handi-Van trips those with

travel times of 60 minutes or more) on December 9, 2009 were compared with the estimated travel times for comparable fixed route trips, travel times on six Handi-Van trips (21 percent) were less than the comparable fixed route travel time, by an average of 26 minutes. Twenty-two Handi-Van trips (79 percent) had travel times that were longer than comparable fixed route travel times by an average of 42 minutes. Seventeen Handi-Van trips (61 percent) had travel times that exceeded the travel time on TheBus by 20 minutes or more; travel times for these Handi-Van trips are not comparable to TheBus.

5. Consider scheduling adequate floater capacity (additional vehicles) to allow reassignment of trips that are predicted to be late.
6. Because of the observed differences between the review team's analysis of the sample of driver manifests and Trapeze reports concerning early pickups, conduct additional analysis to determine if the software is computing on-time performance inconsistently. The review team's analysis of data from a sample of driver manifests showed some important inconsistencies between the manifests and the Trapeze data. The sample of driver manifests showed a much higher percentage of early pickups and a much lower percentage of late pickups. Just over 44 percent of the scheduled pickups in the sample of manifests were prior to the start of the 30-minute pickup window, compared to approximately 27 percent in the Trapeze data. The sample of driver manifests showed that 3.9 percent of the pickups arrived outside of the 30-minute window, compared to 14.4 percent in the Trapeze reports. It appeared that the rate of early pickups was higher for subscription trips. Drivers provided anecdotal support for this hypothesis. Some of the interviewed drivers mentioned that in order to stay on time, they arrived early and that their "regulars" were accustomed to this and were usually ready to go
7. Direct OTS schedulers, whether using manual or automated processes, to be more realistic in assigning trips to driver runs. The schedules at the time of the review could not be performed on time and often created unrealistic expectations for drivers and riders. As of January 2010, OTS schedulers estimated that, , at least 10 more morning runs, 10 to 15 more midday runs, and 10–15 more afternoon/evening runs were needed to allow trips to be performed on time. A review of schedules created for Wednesday, January 27, 2010 indicated that many runs are scheduled in a way that does not allow them to be performed on time. Runs often included many pickups that could not be made within their respective 30–minute pickup windows. Because the schedules were overloaded, the schedules often showed estimated drop-off times well past the appointment times requested by riders.
8. Separately report Handi-Van's on-time performance for pickups and drop-offs. A performance standard for all pickups which combines pickup and drop-off performances can mask poorer performance in pickups or drop-offs. Improving performance for pickups and drop-offs may require different procedural or operational changes.
9. Revise the methodology used to evaluate performance to reflect the differences in the proportion of Handi-Van service provided by OTS and each subcontractor.
10. The model drop-off policy would also prevent riders from arriving substantially early (for example, more than 30 minutes prior to the rider's desired arrival time). Consider reviewing operational practices to reduce the number of Handi-Van drop-offs that are more than 30 minutes ahead of the requested appointment time. The review team's analysis compared the arrival times of trips with appointments with the scheduled appointment time, as shown in

Table 9.5. Of the trips with appointment times, 76.4 percent of the drop-offs were made before the appointment time and 49.4 percent of the sample (44 of the 89 drop-offs) were more than 30 minutes early.

11. Once sufficient capacity is provided, revise and direct OTS to revise dispatching procedures to be less reactive and more proactive. It is recommended that dispatchers should scan runs, at least an hour in advance, to identify any trips that are expected to be late. These trips should then be reassigned far enough in advance to allow them to be performed on time. Review team observations of dispatch function indicated that OTS dispatchers reacted to late trips reported by riders and drivers and did not proactively look ahead and manage runs. This appeared to be the case partly because dispatchers spent a lot of time assigning unscheduled trips to runs. There also did not appear to be adequate vehicle capacity to allow for effective reassignment of predicted late trips or proactive management of runs.
12. Consider strategies to remove potential incentives to improperly code no-shows. At the time of the review, OTS "Where's My Ride" agents and dispatchers expressed concern that payments for no-shows might incent taxi companies and drivers to sometimes misrepresent a trip as a no-show.
13. Develop a methodology for correlating the no-show reports submitted by taxi subcontractors with the Trapeze data, for the purpose of auditing the no-show reports. At the time of the review, trip and service records were maintained separately from billing records and there was no way to link them. Because a growing portion of the ADA complementary paratransit service was being sent to taxicab subcontractors at the time, it is important for DTS and OTS to monitor the on-time performance of contractors and subcontractors and to verify the coding of no-shows and missed trips.

    Direct OTS to regularly examine scheduled runs to human service program locations and to communities at a distance from downtown Honolulu on which long travel times occur and estimate fixed route travel times for those trips. In cases where Handi-Van paratransit travel times are not comparable to fixed route travel times, OTS should consider breaking these runs into smaller segments.

10 Resources

Section 37.131(f) of the DOT ADA regulations prohibits operational patterns or practices that significantly limit the availability of service to ADA paratransit eligible riders. The review team examined the resources made available by DTS to provide ADA complementary paratransit service. This information included:

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

The review team also compared the paratransit ridership in the DTS service area with ridership in other systems using a national paratransit demand model.

10.1 Consumer Comments

The three riders contacted in advance of the on-site review said that most drivers were helpful and professional, but some were not. Those in attendance at the CFADAR meeting said the majority of drivers were good, but there were issues with some drivers. One rider characterized the situation as “60/40,” and said that approximately 40 percent of the drivers were not helpful. The main issues cited by the group were that some drivers do not get up from their seats to assist riders on and off the vehicle, and some drivers do not assist with seat belts or even checking to be sure that the riders had secured the seat belts. One person also said she has seen some drivers get upset if ambulatory riders ask to use the lift.

All three riders contacted in advance said that many vehicles were old and not in good condition. They said that the air conditioning on some vehicles was bad, and the ride was rough and bumpy. All three also said that many times the vehicles are not very clean. The seat belts and securement straps were cited, in particular, as needing to be cleaned.

Those who attended the CFADAR meeting mentioned similar issues. One person said the shocks on the vehicles seemed to be bad and the ride was very rough. All who spoke about the vehicles mentioned cleanliness. In particular, riders had issues with the cleanliness of vehicle interiors. Two riders said they did not think vehicles were properly cleaned after being soiled by prior riders.

The tabulation of complaints by DTS did not include a category for driver performance or vehicle condition. These appeared to be included under the “other” category. A detailed review of 16 complaints identified some related to driver performance. These included one about a driver being rude and one alleging unsafe driving.

The one formal complaint on file with FTA at the time of the review complained about “cargo vans” being used to provide service. It also alleged that drivers were disrespectful and rude and cited a specific incident where a driver got upset with a rider and sat in the stepwell to block him from exiting the vehicle.

10.2 Vehicle Fleet

Vehicle Age and Condition

At the time of the on-site review, OTS had a 160-vehicle fleet, which is listed in Table 10.1. As shown, nine vehicles were model years 1998 or 1999, 36 vehicles were model year 2001, and 29 were 2002. Almost half of the fleet was 8 years old or older.

Table 10.1 – Handi-Van Fleet by Model Year

Model Year	Vehicles	% of Fleet
1998	3	2%
1999	6	4%
2001	36	22%
2002	29	18%
2004	5	3%
2006	32	20%
2007	20	12%
2008	28	18%
2009	1	1%
Total	**160**	**100%**

A review of the mileage on the fleet showed that 69 vehicles (43 percent of the fleet) had over 300,000 miles of service. Sixteen vehicles had logged over 400,000 miles of service.

A review of breakdown records also showed that the fleet was quite fragile. Sixty breakdowns were recorded in December 2009, an average of two per day. In addition, on 5 days in December 2009, there were four to five breakdowns recorded.

The review team asked interviewed drivers about the condition of the vehicles. They were also asked if repairs were made promptly when they identified mechanical or condition issues. The 11 drivers who were interviewed provided mixed responses. Three said the vehicles were “good” or “pretty good” and that repairs were typically made promptly. Two said the vehicles were “adequate” or “okay.” One of these two said that interior cleanliness was a problem. Three drivers said that vehicle condition was an issue, with one saying the condition was “fair to poor,” and all three saying that reported problems do not always get fixed right away. One driver said that vehicles were “terrible” and “dirty.” One just commented that the vehicles were very old and that newer equipment was needed. The final driver said they “could be cleaner” and stated that vehicles had very high mileage.

The review team interviewed OTS maintenance staff about vehicle condition and focused on the issues raised by riders about dirty seat belts and securement straps. The OTS staff indicated that they were investigating ways to clean the belts and straps. They said that they were reluctant to use cleaning fluids as this might compromise the materials and the strength of the belts and straps. They said that they were considering a steam cleaning system and obtaining several spare sets of seat belts and securement straps so that they could regularly cycle out and steam clean them.

Mobile Data Terminals (MDTs)

OTS staff mentioned some issues with the reliability of the MDTs. Dispatchers indicated that several MDTs fail to transmit and receive data each day and they then have to ask drivers for actual times and enter this information in the system. They also have to get information about add-ons and cancellations to drivers using the voice systems (two-way radios or Nextels). At the time of the review, OTS managers stated that they were aware of the problem and were working to identify the exact cause and develop a solution. They indicated that the exact cause was unknown and indicated that it was likely a wiring issue, a repeater issue, or a combination of the two. Managers stated that OTS anticipated setting up a special radio shop to handle MDT and other communications equipment issues.

Vehicle Availability and Run Coverage

A review of the run structure showed that the maximum number of runs in service at a given time (the peak pull-out requirement) was 130. This was in the early afternoon and considered afternoon shift change needs and the fact that some vehicles pulled in late for the changeover. Given a total fleet of 160 Handi-Van vehicles, OTS had approximately 30 spares on any given weekday—a spare ratio of 23 percent.

The review team analyzed vehicle availability records for the month of December 2009. The number of vehicles held out for preventive maintenance or longer-term repairs was indicated for all 21 weekdays in the month. Weekends were not examined since the peak pull-out was much lower and there were plenty of spares. Records showed that 20–25 vehicles were held out on five of the weekdays in the month, leaving the operation with 5–10 operable spares. From 26–29 vehicles were held out on 13 of the weekdays in that month, leaving only one to four operable spares available. Thirty vehicles were held out on one day, leaving the system with no operable spares. In addition, 31–32 vehicles were held out on two of the days in the month, which meant that one to two runs had to be closed for lack of available vehicles.

10.3 Driver Availability, Turnover, and Training

Information about the driver workforce was also collected from OTS. This included the total number of drivers and the annual turnover rate. It also included information about driver training.

Driver Availability and Turnover

Table 10.2 shows the number of drivers employed at the time of the on-site review. It also shows the total number of weekday runs typically assigned. The ratio of available drivers to assigned weekday runs is then calculated and presented. Finally, Table 10.2 shows the number of drivers terminated in 2009 and the calculated annual turnover rate.

Table 10.2 – Handi-Van Driver Availability and Turnover (as of January 25, 2010)

Drivers	Weekday Runs Assigned	Ratio of Drivers to Runs	Drivers Terminated in 2009	Annual Turnover Rate
239	162	1.48	6	2.5%

At the time of the on-site review, OTS had a workforce of 239 drivers. With approximately 162 runs scheduled each weekday, OTS had a ratio of approximately 1.5 drivers per scheduled weekday run. Typically, a ratio of at least 1.2 drivers per assigned weekday run is needed to

provide adequate run coverage. By this measure, OTS appeared to have an adequate number of drivers.

In 2009, only six drivers were terminated—either voluntarily or for cause. With a total workforce of 239 drivers, this yields an annual turnover rate of 2.5 percent. A review of the driver roster showed that 37 percent of drivers had more than 10 years tenure with Handi-Van, 28 percent had from 5–10 years of experience, and 35 percent had fewer than 5 years of experience.

Pullout records maintained by OTS were also examined to determine if runs were being closed due to a lack of driver availability. The review team examined records for the week of December 6–12, 2009. For that week, 983 runs were scheduled. No runs were closed because of a lack of drivers. Three runs pulled out late, one because of a morning vehicle running late and not being back in time for the afternoon pullout, one because the manifest was reworked and was not ready at the scheduled pullout time, and one because a driver showed up late.

Overall, OTS appeared to have an experienced and stable driver workforce with very low turnover and good run coverage.

Driver Training

Handi-Van drivers initially receive 28 days of training (224 hours). This includes both classroom training and behind-the-wheel training. A review of the training curricula and materials indicated that appropriate instruction on disability issues is included. This includes disability awareness, assisting riders with various types of disabilities, and proper operation of all accessibility equipment. The training includes current materials, videos, and persons with disabilities as guest speakers.

Drivers also receive ongoing refresher training. Typically, it consists of 2 hours of additional training every 4 months, or approximately 6 hours a year. The topics of refresher training vary, but have included updated instruction on securing various types of mobility aids, as well as safety training. Refresher training is also provided any time a new vehicle or equipment is received to instruct drivers in the proper operation. OTS also provides additional refresher training, as needed, in response to rider issues and complaint investigations.

The review team asked the interviewed drivers if they felt that the initial training they received adequately prepared them for the job. They were also asked if refresher training was provided. Nine of the 11 drivers said that they felt that the initial training they received was good and did prepare them for the job. One of these nine said that even though the initial training was good, there “still is a lot to learn on the job.” Three of the nine said they thought that the training had gotten better in recent years. Two of the 11 drivers said that the initial training they received was not adequate. Both were drivers with over 10 years of experience and indicated that their initial training was provided by prior contractors. Both said that the current training was much better and seemed very good.

The two drivers that indicated they had not received refresher training were both newer drivers with less than one year of experience.

10.4 Other Staffing

As mentioned earlier in this report, staffing in the reservations and WMR areas appeared to be an issue at the time of the on-site review. A review of telephone hold time records showed that actual telephone hold time performance was well below the standards set by DTS. Understaffing

in the WMR area also had resulted in a process where telephone calls were automatically forwarded to dispatchers after being on hold for 30 seconds. When dispatchers were tied up with other issues, this appeared cause the phones to ring excessively without being answered. OTS managers planned to add staff beginning in February 2010.

10.5 Planning, Budgeting, and Funding

Reviewers met with DTS planning and budgeting staff on Monday, January 25, 2010, and gathered information about the process used to develop budgets each year for Handi-Van service. The City and County of Honolulu operates on a July 1–June 30 fiscal year. Budget requests go to each department in July for the following year and are due back to the City in mid-September. DTS works with OTS to develop budgets for Handi-Van service. The budget requests submitted by OTS and DTS typically have two components. The first is the amount needed to maintain current levels of service. The second is a request for any increases in service that DTS and OTS feel are needed. DTS and OTS staff indicated that when considering if additional service is needed each year, they review ridership trends and predict ridership for the following year. This information is then used to estimate the number of vehicle-hours of service needed as well as staffing levels and other budget line items.

DTS staff stated that all parties involved realized there were service issues and ADA compliance issues in 2005. DTS hired a consultant to conduct a thorough review of the service in 2006. The study provided recommendations for improving service quality and for bringing the service into ADA compliance. Among other things, the study recommended an expansion of the service and an increase in the size of the Handi-Van fleet. The study findings and recommendations were accepted by the City and County. Working with OTS, DTS stated it has been actively moving forward in following the consultant's recommendations.

Information about Handi-Van ridership, revenue hours of service, annual operating budgets, and actual operating expenses FY 2005–2010 is shown in Table 10.3. As shown, ridership grew at a rate of 3–4 percent each year from 2005–2008. In 2009, ridership growth slowed and increased by only 1 percent over 2008. For the first 6 months of FY 2010, ridership totaled 427,694. A simple doubling to extrapolate for a full year suggests that ridership in 2010 might be approximately 855,388 one-way trips. This would again represent only a 1 percent increase between 2009 and 2010.

Annual vehicle revenue hours increased slightly more than ridership during the period. This measure of service capacity increased 3–7 percent each year. Extrapolating the 6-month figure for FY 2010–a full year suggests a 3 percent increase in revenue-hours is likely between 2009 and 2010.

Actual operating expenses increased much more than either ridership or revenue hours during the period. Each year from FY 2005–2009, operating expenses increased 11–15 percent. Over the 4-year period, operating expenses increased by approximately 62 percent, while ridership increased by approximately 12 percent. DTS staff explained that the increase in operating expenses was needed to improve service quality. Extrapolating operating expenditures for the first 6 months of FY 2010 suggests that the total for 2010 will be approximately $28,747,306: an 8 percent increase over FY 2009.

Table 10.3 – Handi-Van Ridership, Revenue-Hours of Service and Actual Operating Expenses, FY 2005–2010

Fiscal Year	Annual Ridership	Pct. Change	Annual Revenue Hours	Pct. Change	Actual Operating Expenses	Pct. Change	Operating Budget	Pct. Change
2005	758,354	NA	290,218	NA	$16,454,567	NA	$15,123,559	NA
2006	787,360	4%	300,408	4%	$18,418,672	12%	$18,013,364	19%
2007	811,966	3%	322,531	7%	$20,855,392	13%	$19,706,101	9%
2008	838,470	3%	335,729	4%	$23,066,859	11%	$21,184,414	8%
2009	846,072	1%	346,287	3%	$26,614,593	15%	$28,697,186	35%
2010	427,694*	NA	179,096*	NA	$14,373,653*	NA	$28,998,536	1%

*FY 2010 ridership, revenue hours, and actual operating expenses are for the six months from July-December 2009. FY 2010 budget is for the full year

Operating budgets for the period from FY 2005–2008 allowed for increases over the previous year's budgets, but were consistently less than actual expenses each year. Actual expenses were approximately $405,000 more than budgeted in FY 2006, approximately $1.1 million more than budgeted in FY 2007, and almost $1.9 million more than budgeted in FY 2008 (approximately a 9 percent overrun that year. After that overrun, the budget for FY 2009 was increased significantly (by 35 percent) and exceeded actual expenses that year by more than $2 million. Given the excess in the budget in FY 2009, the budget for FY 2010 was only increased by 1 percent over the 2009 amount—to $28,998,536. As mentioned above, an extrapolation of expenses for 2010 suggests that approximately $28,747,306 will actually be spent in FY 2010, slightly less than the budgeted amount. With the planned increase in reservations staffing beginning in February 2010, the actual expenditures for the year might be roughly at budget.

Capital Budgets

The review team also discussed plans for capital replacement and expansion for Handi-Van service with DTS and OTS staff. The review team noticed that there was no formal adopted plan for the service, but that DTS was generally following the replacement and expansion plan recommended in the 2007 consultant study, which had called for 48 vehicles to be replaced in 2010, another 35 in 2011, and 30 per year thereafter through 2016.

If the informal plan is followed, all 1998, 1999, and 2001 Handi-Van vehicles should be replaced in 2010. The 2002 and some of the 2004 vehicles will be replaced in 2011, and the rest of the 2004 and some of the 2006 vehicles will be replaced in 2012. By the end of 2012, the oldest vehicles in the fleet will be 2006 models, which would be replaced in 2013. Replacing 30 vehicles per year after 2012 would allow for a fleet of 160–180 vehicles to be fully replaced every 6 years.

In terms of fleet expansion, DTS stated that over the 2010–2016 timeframe, it would be considering adding just six vehicles to the size of the fleet. Additional expansion would be possible if fewer vehicles were replaced each year. With just 3 percent per year ridership growth however, DTS would need to expand its fleet by five vehicles per year. To address the capacity constraint findings in Chapter 9, it is likely that greater expansion could be needed. As detailed in Chapter 9, schedulers estimated that 10 additional runs were needed in the morning, 10–15 additional runs were needed in the mid-day, and 10–15 additional runs were needed in the

afternoon/evening to allow reasonable schedules to be created. This will likely require 25–30 expansion vehicles.

10.6 Ridership

As mentioned above, Handi-Van ridership in FY 2009 was 846,072 one-way passenger trips. This included 774,675 trips provided directly by OTS plus 71,397 trips provided by subcontractors. To determine how this level of ridership compared with other transit properties, the review team used a national ADA complementary paratransit ridership model to estimate the predicted ADA complementary paratransit ridership in the DTS 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 complementary paratransit demand. The model estimates 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 DTS area using this national model, the review team used a service area population of 909,863, obtained from DTS' 2007 NTD report. A base ADA complementary paratransit fare of $2.00 was used. U.S. Census information was used to estimate the poverty rate, which indicated that 8.5 percent of the population in Honolulu County lived in households with incomes below the poverty level. A conditional eligibility rate of 60 percent was used with on-time window of 30 minutes.

The final factor in the model asks whether trip-by-trip eligibility has been implemented. Observations of the trip reservations process indicated that OTS had not yet implemented conditional, trip-by-trip eligibility. This factor in the model was therefore set at "0."

Using these factors, the TCRP model estimated demand for ADA complementary paratransit service in the DTS area to be 361,664 annual one-way trips. The actual FY 2009 ridership was 846,072 one-way trips. Actual ridership even exceeded the upper limits of the TCRP model (the 95 percent confidence level) of 664,541. DTS and OTS appear to be providing more Handi-Van service than would be predicted. A copy of the summary page from the model showing the ridership estimates for the DTS area are provided in Attachment G.

10.7 Findings

There were no findings of non-compliance concerning resources. See Section 10.8 below for recommendations.

10.8 .Recommendations

1. Add capital resources to replace the oldest vehicles in the fleet as soon as possible, given the vehicle breakdowns and high odometer readings at the time of the review. Implement the informal capital replacement plan that will provide for a more reasonable average fleet age. At the time of the on-site review, the Handi-Van fleet was quite old. Forty-six percent of the fleet was at least 8 years old, and 43 percent of the vehicles had over 300,000 miles of

service. There was an average of two breakdowns per day in December 2009, with as many as five breakdowns occurring on some days. Appendix D to the DOT ADA regulations explains "… if the entity regularly does not maintain its vehicles well, such that frequent mechanical breakdowns result in missed trips or late arrivals, a pattern or practice may exist."

2. Obtain additional vehicles or otherwise gain additional capacity to cover the existing scheduled runs. At the time of the on-site review, OTS did not always have enough vehicles to cover scheduled runs. Runs had to be closed on two weekdays in December 2009 for lack of available vehicles. On 14 other days, the system operated with between zero and four operable spares. At the time of the review, DTS did not have a formal capital replacement and expansion plan for Handi-Van service. Informal plans called for 48 vehicles to be replaced in 2010, 35 to be replaced in 2011, and 30 vehicles per year to be replaced from 2012–2016. With this vehicle replacement plan, DTS should achieve a reasonable average fleet age by the end of 2012. The informal capital plans for Handi-Van service called for only six expansion vehicles over the next several years. In addition to 25–30 vehicles that would be needed immediately to create more realistic schedules, five to six additional vehicles per year will be needed if the service grows at a 3 percent rate per year, which it has done in recent years.
3. Continue to evaluate Mobile Data Terminal ("MDT") reliability issues and implement appropriate solutions. At the time of the on-site review, OTS dispatchers reported some issues with the MDT reliability. This required dispatchers to manually collect and transmit information to and from vehicles. DTS mentioned possible wiring and repeater issues and was working to address the issue
4. Add additional reservationists and WMR agents to reduce telephone hold times and to avoid having to automatically transfer calls to dispatch when calls are on hold for more than 30 seconds. DTS and OTS should also monitor hold times on an ongoing basis and adjust staffing as needed to maintain appropriate hold times.
5. Request increased funding for operating costs for Handi-Van service to allow more frequent service to be provided throughout the island. This is needed in order to eliminate trip denials, negotiation of times more than one hour, and very early pickups. Operating funding should not only allow for more frequent island-wide service, but also for additional capacity to allow feasible schedules to be prepared, on-time performance to be improved, and on-board ride times to be reduced.
6. Obtain resources to expand the fleet size to increase service capacity. In FY 2009, the budget for Handi-Van service exceeded actual operating expenses by more than $2 million. The budget increases, however, do not appear to have been sufficient to provide more frequent service to some parts of the island to eliminate trip denials, or for the capacity needed to allow for feasible schedules Expansion should consider not only additional runs needed in the short-term to allow for more feasible schedules, but also annual growth in ridership. In estimating future ridership growth, DTS and OTS should consider the impacts on demand created by the elimination of denials, improved on time performance, comparable on-board ride times and more frequent island-wide service. The City and County had increased the budget for Handi-Van service since FY 2005 to address service quality issues, accounting for some improvement in service quality. Actual operating expenses increased by 11–15 percent

per year from FY 2005–2009, well above the one to four percent annual increases in ridership.

Attachment A
DTS Response to Draft Report

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 3RD FLOOR
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PETER B. CARLISLE
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

KAI NANI KRAUT, P.E.
DEPUTY DIRECTOR

August 28, 2012

Mr. John R. Day
ADA Team Leader
FTA Office of Civil Rights
U.S. Department of Transportation
Federal Transit Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Dear Mr. Day:

This transmits our responses to your August 10, 2012 draft report summarizing the Federal Transit Administration's (FTA) Americans with Disabilities Act (ADA) Complementary Paratransit Services Review of the Department of Transportation Services (DTS), conducted January 25-28, 2010.

Our comments on the draft report follow the order in which they appear in the report. Comments from contractors Innovative Paradigms and Oahu Transit Services, Inc. are incorporated by reference as part of our response.

We appreciate the intent to establish a collaborative partnership to assist DTS in achieving full ADA compliance in its paratransit program. Nevertheless, we are disappointed that our efforts to work on the compliance issues and concerns raised by the review team, documented in our September 2010 interim report, were neither acknowledged nor addressed in the draft report. We also note that the paratransit eligibility documents identified as having been provided by Innovative Paradigms in September 2011 were transmitted at the request of the FTA, not for purposes of the compliance review, but in conjunction with the DTS and its contractor's consultation with the FTA regarding a paratransit eligibility appeal case.

Notwithstanding these and other concerns, we look forward to continuing to work with the FTA to improve our ADA complementary paratransit system.

Please contact myself at (808) 768-8303 or Eileen Mark at (808) 768-8379 if you have further questions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Attachments: DTS Responses to FTA's ADA Complementary Paratransit Services Review Conducted January 25-28, 2010
Appendix 1: 8/24/2012 Memorandum from Innovative Paradigms
Appendix 2: Comments from OTS, "FTA Complementary Paratransit Services Compliance Review"

cc: Leslie Rogers, Regional Administrator, FTA Region 9
Monica McCallum, Regional Operations Division Chief, FTA Office of Civil Rights
Derrin Jourdan, Regional Civil Rights Officer, FTA Region 9

DTS Responses to Federal Transit Administration's (FTA) Americans with Disabilities Act (ADA) Complementary Paratransit Services Review conducted January 25-28, 2010

Chapter 2 Overview

Page 5, paragraph 5

Statement: " ... the review team met with representatives of Citizens for a Fair ADA Ride (CFADAR), a rider group formed **to provide comments to DTS** on the service."

Correction: CFADAR was formed to provide comments to **Oahu Transit Services, Inc.**, the entity contracted by the City to operate the service.

Chapter 3 Background

Page 9, paragraph 6 ("Description of Fixed Route Service (TheBus)")

Statement: "A discount ($1) fare was advertised for youth (ages 6-17), seniors (65 and older) and persons with disabilities who had a TheBus Disability Card or Med0icare card."

Correction: The discount fare is also given to paratransit-eligible riders showing their TheHandi-Van card.

Page 10, paragraph 8 ("Service Area")

Statement: "The Rider's Guide ...stated that the service "is generally available **throughout Oahu**". ...The service description posted on the DTS website says the service "is generally available **islandwide**."

Response: The two statements are not contradictory because TheHandi-Van service operates within the City and County of Honolulu, which encompasses the Island of Oahu.

Chapter 4 Summary of Findings

Page 17, paragraph 3

Statement: "Service hours for Handi-Van were listed in the Rider's Guide as available from about 5 a.m. to 1 a.m. The Rider's Guide also stated that 24-hour service was available within ¾-mile of Routes 2 and 40. To meet the requirements of §37.131(e) of the DOT ADA regulations, **DTS must make Handi-Van service available throughout the same hours and days of fixed route service and direct reservations to accept these trip requests. DTS must ensure that eligible riders are made aware of the change, direct contractor(s) to adjust the scheduling software to recognize these trips and ensure that contractors(s) have vehicles and drivers available to provide these trips.** As part of DTS' response to

this finding, please provide a copy of the directive(s) and revised public information to FTA."

Response: The draft report fails to recognize that DTS addressed this issue in the September 2010 interim response to the FTA.

TheHandi-Van service was available throughout the same hours and days of fixed route service in January 2010 and continues to be available at these hours and days. The FTA's directives were in place in January 2010 and continue to be implemented (i.e., information is provided to riders on the City's and OTS' web sites, in the Rider's Guide and in laminated signs posted in the interiors of paratransit vehicles. OTS schedulers recognize these trips and vehicles are available to provide them). In January 2010, the review team's focus was on public information materials, and after noting that service hours for Routes 88A, 52 and 412 had scheduled stops prior to 5 a.m. and after 1 a.m., did recommend that DTS revise the Rider's Guide to state that service was available "from about 4 a.m. through 1 a.m." instead of "from about 5 a.m. through 1 a.m.", with the term "about" used to highlight that this is the general timeframe, as opposed to exact hours. The change suggested by the review team represents a minor editorial revision that does not comprise the basis for concluding that the service does not meet the requirements of §37.131(e) of the DOT ADA regulations. As such, this finding should be deleted.

Page 18, Section 4.2, ADA Complementary Paratransit Eligibility Process

Please see the attached August 24, 2012 memorandum from Innovative Paradigms (Appendix 1), which responds to Section 4.2 and Chapter 6 of the draft report.

Page 20, Paragraph 3

Statement: "DTS must ensure that employees and contractors count and track as denials any outright inability to serve trip requests ..."

Correction: Because it hires and oversees the staff that conducts the day-to-day operations of the paratransit service, OTS should be identified as the responsible party.

Page 20, Paragraph 3

Statement: "DTS must establish consistent policies to ensure that riders are actually called back ..."

Correction: Because it hires and oversees the staff that conducts the day-to-day operations of the paratransit service, OTS should be identified as the responsible party.

Page 21, Paragraph 2

Statement: "Such a plan should include requiring employees and contractors to collect, measure, and report accurate data regarding on-board time."

Correction: Because it hires and oversees the staff that conducts the day-to-day operations of the paratransit service, OTS should be identified as the responsible party.

Page 21, Paragraph 2

Statement: "At the time of the review, it appeared that DTS did not require OTS or subcontractors to regularly measure or report on board travel time ,,,"

Correction: DTS requires OTS to provide monthly statistics on on-board travel time, using a sample of trip data used for National Transit Database reporting. OTS is responsible for monitoring its subcontractors.

Page 21, Paragraph 3

Statement: "At the time of the review, it appeared that DTS did not require OTS or subcontractors to regularly measure or report on time performance ,,,"

Correction: DTS requires OTS to provide monthly statistics on on-time performance, using a sample of trip data used for National Transit Database reporting. OTS is responsible for monitoring its subcontractors.

Statement: "For the sample day, DTS was on time ..."

Correction: OTS should be the named party.

Page 21, Paragraph 4

Statement: "**DTS** has an implicit obligation to get riders to appointments on time ..."

Correction: OTS should be the named party.

Page 23, Paragraph 5

Statement: "...DTS must establish an appeals process and make it available to an individual on whom sanctions have been proposed ..."

Correction: DTS has maintained such an appeals process. The draft report does not provide any evidence of the lack of an appeals process on which this erroneous conclusion is based. This erroneous statement and associated recommendations should be deleted from the final report

Chapter 5 ADA Complementary Paratransit Service Criteria

Finding No. 1: "DTS must revise its public information to inform applicants and eligible riders that assistance between the curb and the door of their point of origin or destination will be provided..."

Response: The draft report fails to recognize that DTS addressed this issue in the September 2010 interim response to the FTA.

Finding No. 2: "To meet the requirements of §37.131(e) of the DOT ADA regulations, DTS must make Handi-Van service available throughout the same hours and days of fixed route service and direct reservations to accept these trip requests. DTS must ensure that eligible riders are made aware of the change, direct contractor(s) to adjust the scheduling software to recognize these trips and ensure that contractors(s) have vehicles and drivers available to provide these trips. As part of DTS' response to this finding, please provide a copy of the directive(s) and revised public information to FTA."

Response: The draft report fails to recognize that DTS addressed this issue in the September 2010 interim response to the FTA.

TheHandi-Van service was available throughout the same hours and days of fixed route service in January 2010 and continues to be available at these hours and days. The FTA's directives were in place in January 2010 and continue to be implemented (i.e., information is provided to riders on the City's and OTS' web sites, in the Rider's Guide and in laminated signs posted in the interiors of paratransit vehicles. OTS schedulers recognize these trips and vehicles are available to provide them). In January 2010, the review team's focus was on public information materials, and after noting that service hours for Routes 88A, 52 and 412 had scheduled stops prior to 5 a.m. and after 1 a.m., did recommend that DTS revise the Rider's Guide to state that service was available "from about 4 a.m. through 1 a.m." instead of "from about 5 a.m. through 1 a.m.", with the term "about" used to highlight that this is the general timeframe, as opposed to exact hours. The change suggested by the review team represents a minor editorial revision that does not comprise the basis for concluding that the service does not meet the requirements of §37.131(e) of the DOT ADA regulations. As such, the entire finding should be deleted from the final report..

Finding No. 3: "...it is unclear whether the records kept were sufficient to meet the requirements under §27.121(b) that copies of complaints be kept on file for one year and that a summary of complaints be maintained on file for five years."

Response: The review team did not request this information. Please see the attached August 24, 2012 memorandum from OTS (Appendix 2), which responds to this issue. The draft report contains no information that provides the basis for concluding that the requirements under §27.121(b) are not being met. As such, the entire finding should be deleted from the final report.

Chapter 6 ADA Complementary Paratransit Eligibility

Please see the attached August 24, 2012 memorandum from Innovative Paradigms (Appendix 1), which responds to this chapter.

Chapter 9 Service Performance

Page 66, Paragraph 5

Statement: "The March 2011 Revision [of TheHandi-Van Rider's Guide] stated that a no show occurs when:"

Comment: In the FTA letter transmitting the draft report, it is emphasized that, "FTA requests that you only respond to the specific findings that were made at the time of the compliance review ...". It is not clear why the FTA chose to include a reference to this 2011 document and yet fails to recognize that DTS addressed this and other issues in the September 2010 interim response to the FTA.

Page 77, Paragraph 3

Statement: " ...**DTS** had contracted with two taxicab companies for supplemental capacity ..."

Correction: OTS should be the named party.

Page 78, Paragraph 2

Statement: "Subcontractors invoiced **DTS** ..."

Correction: OTS should be the named party.

Finding No. 1: "At the time of the review, it appeared that DTS did not require OTS or subcontractors to regularly measure or report on board travel time ,,,"

Correction: DTS requires OTS to provide monthly statistics on on-board travel time, using a sample of trip data used for National Transit Database reporting. OTS is responsible for monitoring subcontractors.

Finding No. 2 :"At the time of the review, it appeared that DTS did not require OTS or subcontractors to regularly measure or report on time performance ,,,"

Correction: DTS requires OTS to provide monthly statistics on on-time performance, using a sample of trip data used for National Transit Database reporting. OTS is responsible for monitoring subcontractors

Finding No. 5 : "At the time of the review, it appeared that DTS did not appear to have a written policy or procedure for employees, contractors and subcontractors to follow prior to declaring rider no-shows."

Correction: As this finding relates to operational situations, including use of the MDT equipment and dispatch functions, OTS should be the named party.

Finding No. 8: "...DTS must establish an appeals process and make it available to an individual on whom sanctions have been proposed ..."

Response: DTS has maintained such an appeals process. The draft report does not provide any evidence of the lack of an appeals process on which this erroneous conclusion is based. This erroneous statement and associated recommendations should be deleted from the final report.

Appendix 1
8/24/2012 Innovative Paradigms Response

To: Geri Ung
The City and County of Honolulu - DTS

From: Phil McGuire
Marilyn Cole
Sean Powers

RE: Comments on FTA Draft Report

Per the request from Eileen Mark, we have reviewed the FTA Draft Report and submit the following comments that address any material statements of fact about the operations at the time of the January 2010 FTA review.

Page 31, Section 6.1

The 14 riders who attended the CFADAR meeting stated that the outcomes of the October 2009 eligibility process "seemed fair." One person commented that she had heard that an applicant who was blind and used a dog guide had been denied due to staff misconceptions about the level of assistance provided by the dog.

Comment: The reference to the denial of service due to staff misconceptions is based on an unsubstantiated comment from "one person". Since there is no evidence that this incident occurred, the reference to the denial of service should be omitted.

Page 34

IP employed two Mobility Coordinators (MCs) who conducted the interviews and most of the in-person assessments. The two MCs at the time of the on-site review had experience working with persons with disabilities as counselors or as job trainers. Neither was a licensed Occupational Therapist (OT) or Physical Therapist (PT). IP stated that MCs completed an 80-hour training course that included instruction in the ADA regulations, eligibility policies and procedures, and the specific interview and assessment tools and protocols used.

At the time of the review, IP managers stated that they had not established the qualifications for MCs because MCs focused on making a "transportation decision" rather than a "medical decision."

Comment: At the time of the January 2010 FTA review, IP employed three Mobility Coordinators, not two. The three MCs and the Program Manager conducted all of the in-person assessments.

DOT ADA regulations do not require that mobility coordinators or other individuals who conduct in-person interviews/functional assessments be licensed Occupational Therapists (OT) or

Physical Therapists (PT). Thus, the fact that "*Neither [MC] was a licensed Occupational Therapist (OT) or Physical Therapist (PT)*" is not relevant.

The statement, "At the time of the review, IP managers stated that they had not established the qualifications for MCs because MCs focused on making a "transportation decision" rather than a "medical decision" is factually untrue. At the time of the review, IP had well defined and established qualifications for MCs. The qualifications had been used for recruiting purposes as early as August 2009 when hiring of MCs began. A copy of the 2009 job posting for the Mobility Coordinator position is shown on the following page.

IP did not at the time of the review (and does not today) require MCs to be licensed medical professionals because it is the company's policy that MCs focus on making transportation decisions rather than medical decisions. The approach utilized by IP in 2009 subsequently has been validated by the FTA in its 2012 letter to the City and County of Honolulu regarding HA Complaint No. 12-0105:

> "DOT ADA regulations also do not require that the determination for paratransit eligibility be performed by a licensed physician. According to DTS, you were informed during the on-site meeting in December that their staff is trained to make transit skill determinations, not medical determinations, which is consistent with DOT ADA regulations."

Because the DOT FTA regulations are silent on the issue of qualifications of the individuals performing eligibility determinations and the further recent clarification of this point in the above mentioned complaint response by FTA, any mention of OT or PT licensing should be stricken from this compliance audit and any future audit of this transit agency or any other.

FTA's letter to the City and County of Honolulu regarding HA Complaint No. 12-0105: is included as Attachment 1.

paratransit
creating independence through smart transit inc.

MOBILITY COORDINATOR

Paratransit, Inc. is now accepting applications for full-time Mobility Coordinators to conduct eligibility interviews and assessments of applicants for ADA paratransit service, including recertification of existing customers, in order to determine the functional ability to use public transit services; provide one-on-one and group mobility training to eligible program participants in the proper and safe use of the local transit system; create and maintain accurate, detailed records and reports; and provide outreach to community groups and agencies, as needed. The schedule is mostly Monday through Friday with varied hours. This position is assigned to our office in Honolulu, Hawaii. Paratransit does not pay for or provide reimbursement for relocation expenses. The deadline for submitting applications is Friday, August 14, 2009.

The minimum qualifications include, but are not limited to:

- Minimum of six months' experience working with people with disabilities
- Knowledge of ADA requirements pertaining to ADA complementary paratransit service
- Training, education, or work experience sufficient to assess transit-related skills and abilities of applicants to use fixed route public transit
- Knowledge of the local transit system
- Ability to perform functional assessments to determine eligibility and/or conditions under which applicants may use ADA complementary paratransit
- Excellent oral and written communication skills
- Ability to prioritize work and meet deadlines
- Planning and organizational skills
- Ability to use computers, including software programs such as Word, Excel, Power Point and database programs
- Knowledge of proper English usage, grammar, punctuation and spelling
- Possession of a valid driver license
- Possession of appropriate car insurance as designated by Paratransit, Inc.

Salary:

The salary range is $15.00 to $20.00 per hour depending on qualifications. This position includes a benefits package.

Paratransit, Inc., is an affirmative action, equal opportunity employer.

P.O. Box 231100 • Sacramento CA 95823 • Phone: 916.429.2009 • Fax: 916.429.2409 • Web: www.paratransit.org

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Among the set of 41 suggested questions was one asking applicants to describe "any obstructions or barriers between your home and the closest TheBus stop that affects your ability to travel by yourself."

This question must be revised to address travel to and from origins and destination throughout the service area, rather than just soliciting information about potential barriers between applicants' homes and the closest bus stops. Not all trips that the individual might wish to make begin at home, and the conditions around each fixed route stop (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.

Comment: At the time of the review, The City and County of Honolulu provided free travel training to applicants for TheHandi-Van service. IP interviewed applicants to determine a range of mobility options, including paratransit service as well as travel training for fixed route service. The question regarding obstructions or barriers between home and bus stop was designed specifically to assist MCs in evaluating travel training options, not eligibility. This was explained during the interview with the reviewer. It was further explained that for purposes of eligibility determinations, obstacles and barriers system-wide (covering the island of Oahu) were considered.

With this clarification, FTA's request to revise the referenced question should be stricken from the audit findings.

Page 38

Sample letters granting conditional or temporary eligibility did not contain information about the right to appeal. Since these determinations limit eligibility, appeal information must be included.

Comment: At the time of the review, letters granting conditional eligibility contained information about the right to appeal. A copy of a conditional letter from December 2009 is included as Attachment 2.

Sentence should be revised to read "*Sample letters granting <u>temporary</u> eligibility did not contain information about the right to appeal. Since these determinations limit eligibility, appeal information must be included."*

Page 38

To determine the typical volume of applications and the number and percentage of applicants found eligible and not eligible, the review team requested outcome data for January 1–October 12, 2009. During this 42-week period, DTS received 4,863 applications. IP made 4,692 determinations and returned 171 incomplete applications (3.5 percent). On average, DTS received 512 applications each month with approximately 494 determinations made. Eligibility was granted for 4,583 applicants (97.3 percent) while 109 applicants were determined not eligible (2.3 percent).

Comment: IP did not make any determinations during the period January 1 - October 12, 2009. All determinations were completed by DTS staff. All incomplete applications were returned by DTS staff. IP began conducting in-person interviews on October 14, 2009.

With this clarification, the sentence should be rewritten, "*During this 42-week period, DTS received 4,863 applications. DTS made 4,692 determinations and returned 171 incomplete applications (3.5 percent).*

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To compare determination outcomes for the October 2009 eligibility process to those from the prior one, data was also collected on interviews requested, interviews conducted, and determinations made from October 14, 2009–January 27, 2010. The data indicated that 1,036 individuals made appointments for interviews during this period (approximately 300 per month). Only 720 interviews were conducted.

From October 14, 2009–January 27, 2010, IP made 606 determinations, approximately 173 per month. This is an approximately 65 percent decrease in the number of individuals requesting interview appointments, compared to the prior process. It appeared that fewer individuals were requesting consideration for Handi-Van eligibility; others appeared to initiate the process by calling for interview appointments, but had apparently decided not to participate in the interview.

Comment: During the period October 14, 2009 - January 27, 2010, there were 1,036 telephone calls regarding appointments at the Eligibility Center. As defined in TheHandi-Van Monthly Report, appointment calls are "in-take calls received during the calendar month to schedule, cancel, or reschedule interviews, regardless of when interview is scheduled."

It is factually more accurate to state that "the data indicated that there were 1,036 calls from individuals to schedule, cancel or reschedule appointments. During the period October 14, 2009 - January 27, 2010, a total of 720 interviews were conducted."

Under the prior process, individuals submitted paper applications and did not request interview appointments. Thus it is factually incorrect to state that "this is an approximately 65 percent decrease in the number of individuals requesting interview appointments, compared to the prior process."

With this clarification, the sentence stating that there was a 65% decrease in the number of individuals requesting interview appointments should be deleted.

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These percentages under the October 2009 process do not appear to explain the significant decline in the number of applicants.

Comment: The percentages shown for determinations made during the period October 14, 2009 - January 27, 2010, do not indicate the total number of individuals applying for service during the period. It is not factually accurate to use completed determination statistics as an indication of a decline in the number of applicants. The lower number of completed determinations during the period October 2009 - January 2010 involves a number of factors, including the ramp up of services during the first four months of operation of the Eligibility Center.

Pages 39-40

At the time of the review, DTS stated that it considered the application to be complete once the in-person interview had been conducted and the applicant had provided all required documentation. For applicants indicating a vision disability, this included providing visual-acuity statements or field-of-vision statements. For applicants indicating a psychiatric disability this included providing documentation of the disability from a treating professional or service provider.

Comment: At the time of the review, the application for service was considered complete once the in-person interview and transit skills functional assessments (as needed) had been conducted, and supplemental information from healthcare providers (as needed) had been obtained.

Because the above description of when an application was considered complete was in place at the time of the review, FTA's description in the report should state, "*At the time of the review, DTS stated that it considered the application to be complete once the in-person interview and transit skills functional assessments (as needed) had been conducted and supplemental information from healthcare providers (as needed) had been obtained.*"

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In one of the 16 cases where conditional eligibility was granted, the applicant had late-stage renal failure and was receiving dialysis treatment. The determination granted conditional eligibility for return trips from dialysis. The determination should not have been tied to a specific trip purpose. Instead, it would have been more appropriate to grant conditional eligibility for trips when severe fatigue prevented use of the fixed route service.

The review team discussed with IP the issue of limiting eligibility to a particular trip purpose, dialysis, in this case. While the intent is to provide ADA paratransit service at times when the person's health condition and/or the effects of the treatment make the person too fatigued to be able to use fixed route service, tying eligibility to dialysis trips only is not appropriate. For example, a person with end-stage renal failure may be too fatigued not only when they are traveling to and from dialysis treatment, but at other times as well. Limiting their eligibility to

dialysis trips only would prevent them from using Handi-Van service to make other trips at times when they are too fatigued to use fixed route service. Instead of tying eligibility to a particular trip purpose, DTS must grant eligibility for trips when severe fatigue prevents a rider from using fixed route service. IP staff stated that conditional eligibility determination letters would be revised accordingly.

Comment: During the review, IP explained that the condition of "Post Dialysis" was a description used under the previous process. Under the new system, the condition description was stated as "Because of your health condition you have a bad day", in order not to tie eligibility to any specific type of trip, such as dialysis trips.

The final sentence of the section should state that during the review, IP reported that the use of "post dialysis" as a conditional already had been discontinued.

Attachment A

Brochure used at the time of the review.

Comment: The brochure shown on the following page is included in Attachment A as the brochure used at the time of the review. This is factually incorrect. This brochure, showing Peter Carlisle as Mayor, was not used until after October 2010, when Mr. Carlisle assumed office. The correct brochure is included as Attachment 3.

What can I expect?

Your in-person eligibility interview may include your own assessment of your ability to use TheBus, a verification of your disability, and, at no-charge, an assessment of your physical and cognitive ability to ride a fixed route bus. Your balance, strength, coordination, range of motion, or general orientation may be assessed.

You may bring someone with you to the interview, which may take one to two hours. Part of the assessment may be conducted outdoors, so please dress appropriately.

Information provided by a health care or disability service provider about your disability or its symptoms will also be considered. You may bring this information to the interview.

Eligibility determinations normally will be made within 21 days of completion of the assessment process. You may appeal the determination if you disagree with it.

TheBus

Using fixed route service increases the mobility options of individuals with disabilities.

Buses are wheelchair accessible and are equipped with lifts or low floors. Other accommodations such as stop announcements make using the fixed route bus service possible for many people.

TRAVEL TRAINING

Travel Training is available to help you learn to use TheBus. During your in-person interview, your Mobility Coordinator can give you information on this free training that is designed to increase your transportation options.

Call for More Information

TheHandi-Van is an origin-to-destination, shared ride, accessible bus service for people who are eligible under the Americans with Disability Act (ADA) guidelines.

To be eligible to use TheHandi-Van, you must take part in an in-person interview at TheHandi-Van Eligibility Center at The First Insurance Center, 1100 Ward Avenue, Suite 835 in Honolulu.

To schedule your interview or to get more information about TheHandi-Van eligibility process, call 808-538-0033. Our Mobility Coordinators will be happy to help you.

TheHandi-Van
Eligibility Center
808-538-0033
Monday - Friday
8:30 AM to 4:00 PM

Visit TheHandi-Van website at
www.honolulu.gov/dts/riders.htm

TheHandi-Van
Eligibility Information

Effective 10/14/2009

TheHandi-Van is the City and County of Honolulu's paratransit service for people with disabilities who are unable to independently use TheBus.

This informational brochure will help guide you through the process of applying for TheHandi-Van eligibility.

We hope you will find it useful and convenient.

Mayor Peter Carlisle

How do I apply for TheHandi-Van?

To apply for eligibility to use TheHandi-Van, individuals must appear in-person to complete an assessment process. During a confidential interview, you will meet with a Mobility Coordinator who will identify your specific transit use skills, abilities and/or limitations. The Mobility Coordinator will assist you in navigating through the process and can provide information about additional transportation options and services.

TheHandi-Van Eligibility Center can help you learn about your transit options.

NO MORE PAPER APPLICATIONS

Under the previous eligibility system, decisions about each customer were based primarily on written information. Now you will have an opportunity to better explain your personal circumstances and abilities.

During your interview, you will learn about other programs that can increase your transportation independence. The assessment process is not a medical determination of whether or not you have a disability, but rather a determination about what your transportation options can include.

Disability alone does not determine eligibility; the decision is based upon a customer's ability to use the City's fixed route bus. The assessment is to ensure that the person applying for service has a verified disability and to understand the transit-related tasks that the person can perform.

TheHandi-Van Eligibility Center

First Insurance Center
1100 Ward Avenue, Suite 835
Honolulu, HI 96814

808-538-0033
Monday - Friday
8:30 AM - 4:00 PM

What information will I need?

This checklist is designed to assist you. By bringing the information listed below with you to your interview, you can help avoid delays in processing your request for TheHandi-Van service.

✓	**Helpful Information to bring to your interview**
	Your contact phone numbers (home, cell, work)
	Your complete street and mailing addresses
	Emergency contact names, relationships, phones (home, cell, work)
	Health care provider names, complete addresses, phone and fax numbers, and contact names
	Mobility devices that you use, including power and manual wheelchairs, scooters, walkers, canes, etc.
	If your vision is impaired, a Visual Acuity or Field of Vision Statement from your vision care provider
	If you have a psychiatric condition, a diagnosis and statement from your mental health care provider
	Optional Information
	Supplemental information from your healthcare or disability service provider regarding your ability to use fixed route bus service
	Location of the bus stop closest to your home

Questions?
Call TheHandi-Van Eligibility Center
538-0033

6.6 Findings

1. To meet the requirements of §37.125(c) of the DOT ADA regulations, DTS must revise its public information to explicitly inform applicants and prospective applicants that if DTS has not made an eligibility determination within 21 calendar days, presumptive eligibility will be granted and service will be provided on the 22nd day until and unless DTS denies the application. As part of DTS' response to this finding, FTA requests that DTS clarify when an application is considered complete, as the October 2009 eligibility process eliminated paper applications. It is unclear whether an application is considered complete when an applicant participates in the interview/assessment, or if, as described in Section 6.2 of this report the IP Mobility Coordinator (MC) decides after the interview/assessment whether sufficient information has been gathered to make a determination. Secondly, FTA requests the current average number of days between a request for an appointment and the actual interview/assessment. Third, FTA requests that DTS describe the current maximum and average number of steps and days, beginning with an applicant's call for an interview/assessment, needed to complete the eligibility determination processes, for both new applicants and those applying for recertification. Finally, FTA requests that DTS specify the frequency of its review of IP's eligibility determinations.

Comment:

Public Information: DTS has revised its informational brochure, which is included as Attachment 4.

Clarification of when an application is complete: Since October 14, 2009, an application is considered complete when an applicant has participated in an in-person interview and transit skills functional assessments (as needed), and supplemental information from healthcare provider(s) has been obtained (as needed).

Average days between a request for appointment and interview/assessment: Since March 2010, monthly summary reports provided by IP to DTS include this information. Information is also available on an individual applicant for days between call and appointment.

The average number of days between a call for an appointment and an interview/assessment for the period October 1, 2011 through June 30, 2012 is 10 calendar days. See report on the following page.

Innovative Paratransit Solutions

TheHandi-Van Eligibility Center
Summary Report: YEAR 3

7/16/2012

	Oct-11		Nov-11		Dec-11		Jan-12		Feb-12		Mar-12		Apr-12		May-12		Jun-12		Jul-12						YTD	Estimate
Calls		%		%		%		%		%		%		%		%		%		%		%		%		
[1]Calls for Interviews	476		413		390		441		404		457		481		492		464								4018	
Scheduling (based on call data)																										
[2]Avg Days between Call & Interview	11		10		8		9		9		8		8		11		12								10	
[3]Walk-In Interview	9		6		9		2		1		3		1		1		0								32	
Interviews																										
New	258	66%	246	69%	185	56%	176	58%	186	55%	199	58%	186	50%	179	53%	198	64%							1813	
Recertification	134	34%	108	31%	143	44%	126	42%	154	45%	143	42%	183	50%	159	47%	109	36%							1259	
TOTAL Interviews	392	100%	354	100%	328	100%	302	100%	340	100%	342	100%	369	100%	338	100%	307	100%	0		0		0		3072	
Functional Assessments																										
Tinetti Gait & Balance	195	71%	195	73%	204	74%	192	76%	185	74%	211	75%	237	74%	237	74%	210	79%							1866	
Transit Skills Assessment	78	29%	72	27%	72	26%	60	24%	64	26%	70	25%	85	26%	84	26%	55	21%							640	
TOTAL Functional Assessments	273	100%	267	100%	276	100%	252	100%	249	100%	281	100%	322	100%	321	100%	265	100%	0		0		0		2506	1,596
[4]In-Person Determinations Completed (by Eligibility Type)																										
Conditional	23	6%	49	13%	59	18%	30	10%	35	11%	39	11%	73	21%	47	13%	26	8%							381	
Unconditional	241	66%	214	59%	207	61%	213	73%	222	70%	240	70%	234	66%	242	69%	243	79%							2056	
Temporary Conditional	2	1%	2	1%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%							4	
Temporary Unconditional	85	23%	73	20%	56	17%	38	13%	49	15%	40	12%	32	9%	50	14%	33	11%							456	
Not Eligible	16	4%	27	7%	15	4%	12	4%	13	4%	23	7%	13	4%	10	3%	7	2%							136	
"Total In-person Determinations	367	100%	365	100%	337	100%	293	100%	319	100%	342	100%	352	100%	349	100%	309	100%	0		0		0		3033	3,900
Other Determinations Completed (by Eligibility Type)																										
Visitor	19	21%	19	26%	16	21%	16	18%	13	15%	22	23%	15	15%	14	18%	3	4%							137	
[5]Temporary (for Med Reason)	66	73%	51	69%	55	71%	69	78%	64	74%	61	65%	75	74%	57	71%	55	81%							553	
[6]Deceased	6	7%	4	5%	6	8%	4	4%	10	11%	11	12%	11	11%	9	11%	10	15%							71	
Total Other Determinations	91	100%	74	100%	77	100%	89	100%	87	100%	94	100%	101	100%	80	100%	68	100%	0		0		0		761	
TOTAL ALL DETERMINATIONS	458		439		414		382		406		436		453		429		377		0		0		0		3794	
[7]Compliance with ADA Timelimit																										
[8]Maximum Days	16		14		16		21		12		20		20		13		9									
No. of Determinations over 21 days	0		0		0		0		0		0		0		0		0								0	
[9]Average Days	1		1		1		1		1		1		1		1		1								1	
Travel Training																										
Referred for TT	4		4		1		3		10		12		20		9		12								75	
Started TT	0		0		1		2		3		3		5		6		5								25	
Continuing In Training	0		0		0		1		2		1		4		6		6									
Completed TT	1		0		1		1		1		5		2		4		5								20	70

[1]Calls for Appt	In-take calls received during the calendar month to schedule, cancel, or reschedule interviews, regardless of when interview is scheduled
[2]Avg Days between Call & Interview	Average number of days between the date of the in-take call and the date of the scheduled interview
[3]Walk-In Interview	Walk-in applicants without a scheduled interview who receive a same-day interview
[4]In-Person Determinations	Determinations completed during the calendar month, regardless of when interview was conducted, reported by Eligibility Type
[5]Temporary (for Med Reason)	Short term eligibility for immediate service until an in-person interview can be conducted. Must be requested by a healthcare organization (dialysis center, hospital, etc.)
[6]Deceased	Determinations created during a calendar month to update records of clients who have died
[7]Compliance with ADA Timelimit	ADA requirements state that determinations must be completed within 21 days of receipt of completed application
[8]Maximum Days	The maximum number of days between the application completed and the determination completed dates, for determinations completed during the calendar month
[9]Average Days	The average number of days between the application completed and the determination completed dates, for determinations completed during the calendar month
"Total In-person Determinations	One determination included in the report for May was completed in March 2010 but was not included in the report/invoice for that month

Current maximum and average number of steps and days: Although steps are not defined nor required by DOT ADA regulations. IP has defined its steps in the eligibility process as 1) completion of an in-person interview, 2) completion of any additional functional testing deemed necessary by the MC, 3) receipt of any supplemental verification information deemed necessary by the MC, and 4) notification of eligibility status. Steps 1 and 2 are completed at the time of the appointment. Step 3 is initiated at the time of the appointment with completion being dependent upon the responsiveness of the health care provider. Step 4 is completed when all information is reviewed and determination documents been finalized and reviewed. The maximum time allowed for Step 3 is 5 business days. Overall since October 2009, the average number of days between completion of the application process and notification of eligibility is one day.

Recertification applicants are notified approximately 60 prior to the expiration of their eligibility. Often recertification applicants choose to schedule appointments 30 - 60 days from receipt of this notification. For example, an applicant whose eligibility ends on May 31, calls on April 1 and selects an appointment date of May 15. Appointments are available before May 15, however the individual chooses not to accept them. Because of this, the maximum number of days between call and appointment can appear to be quite large. Additionally, the inclusion of these long-term requests in monthly statistics tends to skew the data. Since March 2010, the average number of days between call and appointment is reported monthly by IP to DTS. For the period October 1, 2011- June 30, 2012, the average number of calendar days between call and appointment was 10 days. Since January 2012, the longest time between a call for an appointment and an interview was 51 days. This was at the applicant's request.

2. At the time of the review, Innovative Paradigms (IP), DTS' contractor for eligibility determinations, was not recording or tracking milestones in the eligibility determination process. Developing a system for tracking milestones in the application process, including the dates that interviews/assessments are requested, offered and accepted and scheduled, dates that customers no-show for these appointments, and the date that the determination letter is mailed is essential for DTS to grant presumptive eligibility as required.

Comment:

Milestones: Since March 2010, the following milestones have been tracked by IP:

- Date of call for appointment
- Date of appointment
- Cancelled/No show appointments
- Date of interview
- Date of transit skills assessment(s)
- Date(s) of requests for supplemental information from healthcare provider(s)
- Date supplemental information is received
- Date of determination review by program manager

- Date of Determination completion
- Date notification is mailed to applicant

3. At the time of the review, TheHandi-Van Eligibility Information (Brochure/Flyer) suggested that applicants had the option to bring documentation of psychiatric and vision disabilities from a health care provider to the interview/assessment. However, when applicants indicating these disabilities called to schedule the appointment, IP told them this information was required. Because a diagnosis of a psychiatric disability and /or vision loss at the level of legal blindness or greater cannot be determined through a physical functional assessment, DTS must revise public information and processes to resolve the discrepancy between print and verbal instructions to minimize potential delays in applicants participating in the interview/assessment. As part of DTS' response to this finding, please provide copies of the revised public information and policies to FTA.

Comment:

The statement above is factually untrue. The brochure included in Attachment A of the report and referenced above is not the brochure that was used at the time of the review. The correct brochure is included as Attachment 3. At the time of the review, the brochure included a checklist of "necessary information" to be brought to the interview. The brochure stated, "Please help us help you by coming to your interview prepared with the required information. Not bringing the information listed above may delay your eligibility determination." The brochure did not indicate that applicants had an option to bring documentation as stated in the above paragraph from the report. Thus the statements of IP staff and instructions included in the brochure at the time of the review were consistent.

This finding is factually untrue and should be deleted from the report.

4. At the time of the review, IP's Mobility Coordinators (MCs) overlooked or did not consider potential barriers related to street crossing, such as crossing wide streets and busy intersections and the functional walking speed necessary to accomplish these tasks when making final determinations, even though these factors were listed on the Determination Form, a thorough checklist of potential barriers that IP had developed for MCs to use when making final determinations. This observation was supported by the review team's analysis of a sample of determinations, as at least one condition was omitted in each of the four conditional determination decisions reviewed. DTS must direct IP MCs and Managers to consider all barriers to using fixed route service on IP's Determination Form when applicants are granted conditional eligibility, including walking speed and the ability to cross wide streets and busy intersections. Please provide a copy of the directive to FTA.

Comment:

Consideration of all barriers: Since January 2010, IP staff has considered all barriers and obstacles when granting conditional eligibility.

5. One of the 41 suggested questions, making up the paratransit application at the time of the review, that MCs used during the interview/assessment asked applicants to describe "any obstructions or barriers between your home and the closest TheBus stop that affects your ability to travel by yourself." To meet the requirements of §37.125 of the DOT ADA regulations, this question and public information containing this question must be revised to address travel to and from origins and destinations throughout the service area, rather than just soliciting information about potential barriers between applicants' homes and the closest bus stops. DTS must also ensure that eligibility determinations are based on an individual's functional abilities to use fixed route service to travel between any origin and destination within the service area, rather than proximity to a particular bus stop. Not all trips than an applicant may make will begin at home, and environmental conditions that may interact with a rider's disability to prevent use of the fixed route service (terrain and lack of curb ramps, for example) are not necessarily identical to those surrounding the stop that is closest to the individual's home. In addition to revising this question, DTS must also revise all public information containing this question, including online information entitled "What Information Do I Need at my In-Person Interview?" As part of DTS' response to this finding, please provide copies of the directive, revised public information and the revised set of suggested interview questions to FTA.

Comment:

Obstructions between home and bus stop: At the time of the review, The City and County of Honolulu provided free travel training to applicants for TheHandi-Van service. IP interviewed applicants to determine a range of mobility options, including paratransit service as well as travel training for fixed route service. The question regarding obstructions or barriers between home and bus stop was designed specifically to assist MCs in evaluating travel training options, not eligibility. This was explained during the interview with the reviewer. It was further explained that for purposes of eligibility determinations, obstacles and barriers system-wide (covering the island of Oahu) were considered.

With this clarification, FTA's request to revise the referenced question should be stricken from the audit findings.

6. At the time of the review, the sample letters provided to the review team granting conditional or temporary eligibility did not contain information about the right to appeal the decision. To meet the requirements under §37.125 of the DOT ADA regulations, DTS must ensure that its eligibility determination letters granting temporary or conditional eligibility inform applicants of the right to appeal, since these determinations limit a rider's eligibility. DTS must inform similarly-situated riders who were not afforded their right to appeal that they may reapply for eligibility. DTS must direct IP to revise determination letters accordingly and provide examples of the revised letters and a copy of the directive to FTA. As part of DTS response to this finding, please submit an example of letters and/or other public information sent to these riders informing them of the right to reapply.

Comment:

Notification of right to appeal: See Attachment 2. At the time of the review, conditional letters did include information about the right to appeal the decision.

This finding should be revised to indicate that only letters granting temporary eligibility did not contain information about the right to appeal the decision.

7. In one of the 16 cases examined by the review team, DTS granted eligibility only for return trips from dialysis treatment. This policy does not meet the requirements under § 37.131(d) of the DOT ADA regulations, which prohibits restrictions based on trip purpose. The review team discussed this issue with IP, and IP agreed to revise the determination letters accordingly. DTS must provide examples of the revised letters to FTA, and inform similarly-situated riders whose eligibility has been linked to trip purpose that they may reapply for eligibility. As part of DTS response to this finding, please submit an example of letters and/or other public information sent to these riders informing them of the right to reapply.

Comment:

Conditional Eligibility based on trip purpose: During the review, IP explained that the condition of "Post Dialysis" was a description used under the previous process. Under the new system, the condition description was stated as "Because of your health condition you have a bad day", in order not to tie eligibility to any specific type of trip, such as dialysis trips.

With this clarification, the FTA's request for DTS to submit an example of letters and/or other public information sent to these riders informing them of the right to reapply should be stricken from the Audit Findings.

6.7 Recommendations

1. Track the number of requests for interview appointments, the number of interviews conducted, and the number of determinations made each month. Documenting this information is also important for ensuring that delays are not being caused by a shortage of MCs. If the number of requests is still or continues to be significantly lower than requests for eligibility before the October 2009 eligibility determination process was implemented, consider discussion with the DTS advisory committee and the community to identify any issues that may potentially prevent or discourage potentially eligible individuals from applying.

Comment:

Monthly summary reporting by IP includes the following information:

- Call for interviews (including cancellations and re-scheduled appointments)
- Average days between calls and interview
- Walk-in Interviews
- Number of interviews conducted (by new or recertification type)
- Number of functional assessments (by type)
- Number of determinations (by eligibility type)
- Maximum days from completed application process to notification
- Number of determinations over 21 days
- Average number of days for determinations

At the time of the review, the average number of calls for interviews per month was 320 per month. As of June 30, 2012, the average number of calls for interviews has increased to 422 per month.

A number of factors have had a role in the decline in the number of requests for eligibility. In October 2009, DTS implemented a fare change policy that eliminated TheHandi-Van eligibility as an entitlement to free fare on TheBus. This change had a significant impact on the number of requests for eligibility. Additionally, IP worked with the medical community to ensure that people needing immediate paratransit service had their needs met. A result of this collaboration was a decline in "just in case" applications being submitted by hospitals, nursing homes and care facilities. Many facilities had used a practice that required the submittal of a TheHandi-Van application as a part of the entry or discharge process.

2. Consider and direct IP to conduct professional verification and/or a functional assessment when the applicant is likely to be determined ineligible, rather than denying eligibility based solely on the interview. This additional information could help support that the denial of eligibility was the appropriate decision, in the event of a subsequent question, complaint or appeal.

Comment:

Since January 2010, "Not eligible" determinations are never issued based solely on an interview. Not eligible determinations require **all** of the following:

- Completion of in-person interview
- Completion of transit skills functional assessments
- Discussion with healthcare provider(s)
- Review by program manager

3. Consider increasing the regularity of DTS reviews of IP's eligibility determinations.

Comment:

DTS will review a sampling of TheHandi-Van Eligibility files on a quarterly basis.

4. Provide training to CAT members on the regulatory requirements of the appeal processes for appeals of eligibility determinations and appeals of proposed suspensions of service for a pattern and practice of no-shows.

Comment:

In February 2011, DTS and IP provided training on the appeals process to CAT and other interested parties.

ATTACHMENT 1: FTA Letter to The City and County of Honolulu

U.S. Department of Transportation
Federall Transit Administration

Headquarters

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

JUN 2 9 2012

[redacted]
Honolulu, HI 96819

Re: HA Complaint No. 12-0105

Dear Ms [redacted]

This letter responds to your complaint against the City and County of Honolulu's Department of Transportation Services (DTS), concerning ADA paratransit service, known as "TheHandi-Van," alleging discrimination based on disability. The Federal Transit Administration (FTA) Office of Civil Rights is responsible for ensuring that providers of public transportation are in compliance with the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, and the U.S. Department of Transportation's (DOT) implementing regulations at 49 CFR Parts 27, 37, 38, and 39.

In the FTA complaint investigation process, we analyze allegations for possible ADA deficiencies by the transit provider. If FTA identifies what may be a violation, we first attempt to provide technical assistance to assist the public transit provider in complying with the ADA. If FTA cannot resolve apparent violations of the ADA or the DOT ADA regulations by voluntary means, formal enforcement proceedings may be initiated against the public transit provider which may result in the termination of federal funds. FTA also may refer the matter to the U.S. Department of Justice for enforcement.

Each response is developed based on the specific facts and circumstances at issue. A determination resulting from a review of these facts is not intended to express an opinion as to the overall ADA compliance of that transit provider.

Complaint Allegations

In your complaint, you alleged the following:

1. DTS employees wrongfully required you to participate in an in-person assessment as a part of your application for paratransit services. You noted that you did not feel comfortable participating in the assessment because it was being performed by a non-medically licensed individual for DTS' TheHandi-Van service.

2. DTS does not use a paper application in its paratransit eligibility process.

Relevant ADA Requirements

Under 49 CFR §37.121 of the DOT ADA regulations, each public entity operating a fixed route bus system must provide paratransit service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed route system. Disability alone does not determine paratransit eligibility; the decision is based on the applicant's functional ability to use the fixed route bus and is not a medical decision. Under 49 CFR §37.125, the process for determining ADA paratransit eligibility will be established by the public entity. Appendix D to this section, which provides interpretive guidance on the regulation, further states:

> The [eligibility determination] process may include functional criteria related to the substantive eligibility criteria of §37.123 and, where appropriate, functional evaluation or testing of applicants. The substantive eligibility process is not aimed at making a medical or diagnostic determination. *While evaluation by a physician (or professionals in rehabilitation or other relevant fields) may be used as part of the process, a diagnosis of a disability is not dispositive.* What is needed is a determination of whether, as a practical matter, the individual can use fixed route transit in his or her own circumstances. That is a transportation decision primarily, not a medical decision.

The ultimate goal of the paratransit application process is to ensure that only people who meet the regulatory criteria, strictly applied, are regarded as ADA paratransit eligible. FTA recognizes that transit entities may wish to provide other service to other persons, which it is not prohibited by the rule, but the eligibility process should clearly distinguish those persons who are provided service on other grounds from those who are ADA eligible.

Analysis

The FTA Office of Civil Rights investigated your complaint after it was filed. The investigation included an information request to DTS. According to information provided by DTS, you first contacted them on December 21, 2011, because two of your friends were determined to be not eligible for paratransit service, and stated that the eligibility process was demeaning. You also claimed that TheHandi-Van staff was not qualified to conduct the paratransit assessment because they are not medically trained.

On or about December 28, 2011, you met with persons from DTS to tour the eligibility center and to learn more about the in-person process for determining paratransit eligibility. According to DTS, you requested to see an application for ADA paratransit service for TheHandi-Van, but were informed that there is no paper application and that all applicants go through the interview process. You, however, insisted that there must be an application as required by federal law.

However, DOT ADA regulations do not require a paper application for eligibility for paratransit service. DOT ADA regulations also do not require that the determination for paratransit eligibility be performed by a licensed physician. According to DTS, you were informed during the on-site meeting in December that their staff is trained to make transit skill determinations, not medical determinations, which is consistent with DOT ADA regulations. As noted above, evaluations by a physician (or professionals in rehabilitation or other relevant fields) may be used as part of the paratransit eligibility process, but a diagnosis of a disability is not dispositive. DTS, like other public entities, must make a determination whether each individual applicant for paratransit service can use the fixed route transit system.

At the conclusion of the tour on the December 28, 2011, DTS stated that it offered you an appointment time for a paratransit eligibility assessment for December 29, 2011, but you declined stating that you would wait until the New Year to apply.

On February 3, 2012, you were scheduled and attended an in-person eligibility interview with DTS. In its response to FTA, DTS stated that you would neither agree to participate in any functional assessment nor sign its authorization for disclosure of protected health information, which would allow the eligibility center staff to contact your health care professional. As a result, DTS says that it informed you that your application would remain incomplete until functional assessments to use the fixed route bus system could be performed and or information from your physicians(s) could help verify your disability prevents use of the fixed route system.

Completing application material is a routine part of recertification. DTS indicates that it sent you a letter via certified mail on February 16, 2012, stating that your application was incomplete. DTS noted that they received a response from you declining to participate in the in-person assessment process, and as a result your application still remains incomplete. If you wish to be assessed by DTS, you must complete all steps of the certification process.

Conclusion

After reviewing all of the submitted materials, we have determined that the information provided does not support a finding that DTS has violated provisions of the DOT ADA regulations in your application for paratransit eligibility. The available information shows that DTS has been responsive to your request to discuss its paratransit eligibility process. Furthermore, you have since indicated in your most recent communication with our office that you will be leaving the state of Hawaii.

This concludes our processing of this matter and no further action will be taken. While FTA's decision in your case is administratively final, it does not prevent you from pursuing this matter privately in the appropriate court. If you have any questions regarding our determination, please contact me or FTA's ADA Team at 1-888-446-4511 or via e-mail at FTA.ADA.Assistance@dot.gov. Any further correspondence should reference 1-TA Complaint No. 12-0105. Thank you for bringing your concerns to our attention.

Sincerely,

John R. Day
ADA Team Leader
Office of Civil Rights

cc: DTS
FTA Region 9

ATTACHMENT 2: Conditional Eligibility Letter with Appeal Information - December 2009

Department of Transportation Services
CITY AND COUNTY OF HONOLULU

TheHandi-Van Eligibility Center

First Insurance Center – Suite 835 • 1100 Ward Ave., Honolulu, HI 96814
808-538-0033 • 808-538-0055 Fax

Catch the Right Bus!

- *TheBus*
- *TheHandi-Van*
- *Travel Training*

12/23/2009

TheHandi-Van ID #:

Dear Mrs. [redacted]

We have completed the review of your recent request for ADA paratransit (TheHandi-Van) eligibility. It has been determined that you are eligible on a **Conditional Basis**, which means you may use the TheHandiVan for some of your trips. Please review the list on the following page, which explains the conditions when you may use TheHandi-Van.

Your eligibility is for the following period: **12/16/2009 to 1/6/2013**.

If there are changes in your condition that would enable you to use the City's fixed route bus service, TheBus, please contact us at 538-0033 at any time.

Please remember that TheHandi-Van provides curb-to-curb service. Therefore, if you need personal assistance to and from TheHandi-Van vehicle at curbside, it will be your responsibility to make these arrangements.

We hope that you will enjoy traveling on TheHandi-Van.

Welcome aboard!

Sincerely,

TheHandi-Van Eligibility Center Staff

Enclosure

Alternate format upon request

Department of Transportation Services
CITY AND COUNTY OF HONOLULU

TheHandi-Van Eligibility Center

First Insurance Center – Suite 835 • 1100 Ward Ave., Honolulu, HI 96814
808-538-0033 • 808-538-0055 Fax

Catch the Right Bus!

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- *TheHandi-Van*
- *Travel Training*

12/16/2009

CONDITIONAL ELIGIBILITY GUIDELINES

Based on your recent eligibility assessment, it has been determined that you may use TheHandi-Van when the following conditions apply:

Because of your health condition you have a bad day

Walking distance to/from the bus stop is greater than 3 blocks

Department of Transportation Services
CITY AND COUNTY OF HONOLULU

TheHandi-Van Eligibility Center

First Insurance Center – Suite 835 • 1100 Ward Ave., Honolulu, HI 96814
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Appeal Process for Persons Denied Eligibility to Access American with Disabilities Act (ADA) Paratransit Service

A person denied an unconditional ADA paratransit eligibility or a TheHandiVan card shall receive a letter from TheHandi-Van Eligibility Center stating the reason(s) for the denial.

Within sixty (60) calendar days of receipt of the letter or such additional time as may be permitted by the Department of Transportation Services (DTS) Director or the Director's designee, the person may appeal the decision to the Director. The appeal process shall begin by filling out the attached Notice of Appeal and filing the form with DTS.

Within twenty (20) working days from the filing of the Notice of Appeal, DTS shall request that three (3) representatives from organizations providing services to disabled individuals conduct an appeals hearing at which time the appellant shall be entitled to be heard in person or through counsel and shall be give a full and fair opportunity to present any fact showing the reason(s) why the denial was in error.

The Appeals Hearing Panel shall have the power to affirm, reverse or modify the decision of TheHandi-Van Eligibility Center, based on findings of fact that justify the decision. The determination by the Appeals Hearing Panel shall be final.

The Notice of Appeal and the appeal hearing requirements shall conform to the applicable provisions of HRS, Chapter 91. All findings of fact, conclusions of law, and decisions and orders of the DTS Director or the Appeal Hearing Panel shall be in written form, kept on file and open to public inspection.

Should there be any questions regarding this policy, please call the DTS Paratransit Operations Branch at (voice/TTY) 808-768-8300.

The Notice of Appeal should be mailed to:

Department of Transportation Services
Paratransit Operations Branch
650 S. King St. – 3rd Floor
Honolulu, HI 96813

Department of Transportation Services
CITY AND COUNTY OF HONOLULU

TheHandi-Van Eligibility Center

First Insurance Center – Suite 835 • 1100 Ward Ave., Honolulu, HI 96814
808-538-0033 • 808-538-0055 Fax

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NOTICE OF APPEAL
(ADA Paratransit Eligibility)

Notice is hereby given that I, _____, wish to appeal the decision that denies me the following for which I believe qualify:
(check one)

____ **ADA Paratransit eligibility:**
Eligibility to use TheHandiVan service

____ **Unconditional ADA Paratransit eligibility:**
Conditional eligibility was given

Therefore, I request that a hearing date be set by the Department of Transportation Services, within twenty (20) working days of receiving this Notice, and that I be notified of the time and the place of the hearing.

_____ _____
Signature Date

Print legibly or type:

NAME: _____

Address: _____

_____

Phone: _____

Notice of Appeal must be submitted within 60 days of notification of denied eligibility
Return this completed form to:

Department of Transportation Services
Paratransit Operations Branch
650 S. King St. – 3rd Floor
Honolulu, HI 96813

Attachment 3: **Brochure used at time of the review**

What can I expect?

Your in-person eligibility interview may include your own assessment of your ability to use TheBus, a verification of your disability, and, at no-charge, an assessment of your physical and cognitive ability to ride a fixed route bus. Your balance, strength, coordination, range of motion, or general orientation may be assessed.

You may bring someone with you to the interview, which may take one to two hours. Part of the assessment may be conducted outdoors, so please dress appropriately.

Information provided by a health care or disability service provider about your disability or its symptoms will also be considered. You may bring this information to the interview.

Eligibility determinations normally will be made within 21 days of completion of the assessment process. You may appeal the determination if you disagree with it.

TheBus

Using fixed route service increases the mobility options of individuals with disabilities.

Buses are wheelchair accessible and are equipped with lifts or low floors. Other accommodations such as stop announcements make using the fixed route bus service possible for many people.

TRAVEL TRAINING

Travel Training is available to help you learn to use TheBus. During your in-person interview, your Mobility Coordinator can give you information on this free training that is designed to increase your transportation options.

Call for More Information

TheHandi-Van is a curb-to-curb, shared ride, accessible bus service for people who are eligible under the Americans with Disability Act (ADA) guidelines.

To be eligible to use TheHandi-Van, you must take part in an in-person interview at TheHandi-Van Eligibility Center at The First Insurance Center, 1100 Ward Avenue, Suite 835 in Honolulu.

To schedule your interview or to get more information about TheHandi-Van eligibility process, call 808-538-0033 Our Mobility Coordinators will be happy to help you.

TheHandi-Van
Eligibility Center
808-538-0033
Monday - Friday
8:30 AM to 4:00 PM

Visit TheHandi-Van website at
www.honolulu.gov/dts/riders.htm

TheHandi-Van
Eligibility Information

New - Effective 10/14/2009

TheHandi-Van is the City and County of Honolulu's paratransit service for people with disabilities who are unable to independently use TheBus.

This informational brochure will help guide you through the process of applying for TheHandi-Van eligibility.

We hope you will find it useful and convenient.

Mayor Mufi Hannemann

What is the new eligibility process?

To apply for eligibility to use TheHandi-Van, individuals must appear in-person to complete an assessment process. During a confidential interview, you will meet with a Mobility Coordinator who will identify your specific transit use skills, abilities and/or limitations. The Mobility Coordinator will assist you in navigating through the process and can provide information about additional transportation options and services.

TheHandi-Van Eligibility Center can help you learn about your transit options.

Under the previous eligibility system, decisions about each customer were based primarily on written information. Now you will have an opportunity to better explain your personal circumstances and abilities.

During your interview, you will learn about other programs that can increase your transportation independence. The assessment process is not a determination of whether or not a you have a disability, but rather a determination about what your transportation options can include.

Disability alone does not determine eligibility; the decision is based upon a customer's ability to use the City's fixed route bus. The assessment is to ensure that the person applying for service has a verified disability and to understand the transit-related tasks that the person can perform

TheHandi-Van Eligibility Center

First Insurance Center
1100 Ward Avenue, Suite 835
Honolulu, HI 96814

808-538-0033
Monday - Friday
8:30 AM - 4:00 PM

What information will I need?

Please use the following checklist to ensure that all necessary information is brought to your interview:

✓	Information to bring to your interview
	Your contact phone numbers (home, cell, work)
	Your complete street and mailing addresses
	Emergency contact names, relationships, phones (home, cell, work)
	Health care provider names, complete addresses, phone and fax numbers, and contact names
	Supplemental information from your healthcare or disability service provider regarding your ability to use fixed route bus service (optional)
	If your vision is impaired, a Visual Acuity or Field of Vision Statement from your vision care provider (optional)
	List of medications you are currently taking
	All mobility devices that you use, including power and manual wheelchairs, scooters, walkers, canes, etc.
	The manufacturer, make and model number of your wheelchair or scooter
	Location of the bus stop closest to your home and the addresses of destinations to which you frequently travel
	List of the barriers between your home and the closest bus stop (i.e., hills, no sidewalk, no curb cuts, uneven surfaces, busy intersection, etc.)

Please help us help you by coming to your interview prepared with the required information. Not bringing the information listed above may delay your eligibility determination. Thank you!

Appendix 2
Oahu Transit Services (OTS) Response

FTA Complementary Paratransit Services Compliance Review

Responses to Review

5.8 Findings

3. "At the time of the review, DTS and its contractor, Oahu Transit Services (OTS) recorded much information about complaints in logs. Based on information provided to FTA, however, it is unclear whether the records were sufficient to meet requirements under §27.121(b) that copies of complaints be kept on file for one year and that a summary of complaints be maintained on file for five years. Please provide information on DTS policies and procedures describing how these obligations are met.

49CFR §27.121(b) provides that.....

> "(b) Compliance reports. Each recipient shall keep on file for one year all complaints of noncompliance received. A record of all such complaints, which may be in summary form, shall be kept for five years. Each recipient shall keep such other records and submit to the responsible Departmental official or his/her designee timely, complete, and accurate compliance reports at such times, and in such form, and containing such information as the responsible Department official may prescribe. In the case in which a primary recipient extends Federal financial assistance to any other recipient, the other recipient shall also submit compliance reports to the primary recipient so as to enable the primary recipient to prepare its report."

We believe the reviewer failed to inspect the full capabilities of the computerized Customer Service Reports (CSR) system. We believe the CSR system fully meets the requirements of §27.121 and that OTS and DTS staffs are proficient in its use. We have attached examples of the output from the CSR system.

Information Stored in CSR

Basic information stored in the master CSR record is shown in Exhibit 5.8-1. This information includes a transcription of a written or emailed comment or a paraphrase of an in-person or telephone call. The document is then routed to the appropriate manager for investigation, which usually includes researching a schedule with GPS playback, interviewing an operator, calling a customer or care giver, etc. The result is documented and sent back to Customer Service. Each step of the process is date stamped and the process is monitored for completion goal measurement. The various steps of the process are monitored by date and by status. The various status categories are shown below:

RECEIVED – This is the date that the initial report is received by the Customer Service Department.
VALIDATED – A report is categorized as VALIDATED when it is determined the report is feasible.
DOCUMENTED – A report is categorized as DOCUMENTED after certain basic checks have been made that allow identification of an incident to a particular driver, location, etc. For example, GPS may be used for this purpose.
PENDING – An incident is PENDING after it has been electronically sent to a responsible manager for investigation.
REVIEWED – After an incident has been investigated by the responsible department, its status is changed to REVIEWED. The document is then electronically forwarded to the Action Officer for approval.
RESPONDED – The incident is categorized as RESPONDED after the Action Officer electronically signs off on the incident.
COMPLETED – The incident is categorized as COMPLETED after Customer Service reviews the response and prepares a response for the customer, if necessary.
PENDING AMENDMENT - Occasionally, new information is received after the incident has been completed. If this occurs, the incident is re-opened and the status of the reopened document is PENDING AMENDMENT.
AMENDED – After a file has been updated with new information, the status of the document is changed to AMENDED.

At each step of the process, the tracking system monitors late or untimely responses.

Summarization

Each incident is categorized for statistical summarization. The major categories are shown below. Within each major category, there are sub-categories that relate to common issues in paratransit. The purpose for the summarization is to allow meaningful analysis of customer complaint trends. A copy of annual summaries of complaints for the past five years is attached as Exhibit 5.8-2 (2008) to Exhibit 5.8-2 (2012).

A - Commendations
B - Schedule Problems – not attributable to bus
C - Poor Attitude of Driver
D - Harassment of Passengers/Others by OTS employee
E - Unsafe Vehicle Operations
F - Route and Schedule Issues
G - Violations of Specific Policies
H - Individuals with Disabilities Requirements
I - Complaints about Bus Stops
J - Maintenance of Equipment

K - Complaints about Non-operator Transit Staff
L - General Transit Policy Complaints
P - Unique to Paratransit Services

DTS ACCESS

DTS staff has total access to all the information within the CSR system, and DTS staff frequently enter the system to track individual complaints or to obtain summaries of trend reports. Summary reports are also discussed at the monthly Senior Staff Coordination Meetings.

Status: COMPLTD
Needs Response: Y
Due Date:
Documented: 08/07/2012
Completed: 08/10/2012

Report Number: P-010856PT
VIC/DTS/PTD:
Date Received: 08/07/2012
Time Received: 09:33
Received By:

OAHU TRANSIT SERVICES, INC.

INQUIRY ON CITY BUS SERVICE

Caller's Name: [redacted]
Gender M
Address: [redacted]

Home Phone:
Work Phone:
Pager:
Cell Phone: [redacted]

Email:
Notes:

Line Number:
Direction:
Location: 41-201 LUPE ST
Stop No:
Date Occur: Tuesday 08/07/2012
Time Occur: 05:00

Bus Number: 2612
Key Number:

Action subclass: VALID

Employee: [redacted]
Emp. No: 4186
Description:
Caller Notified: Yes

Assigned To: [redacted]
Department: DISP

Inquiry

Complainant: Jacob (Son-PCA)
Customer: Faith Tanner

On 8/7/12 at 9 a.m., the PCA for [redacted] called to say that the 5 a.m. pickups to dialysis have a history of being unsatisfactory (late to center). When they call dispatch, they only get excuses. When the van arrives, the operators blame the lack of working vehicles and the time they get their keys, as well as the schedulers who make their schedules. He also questions the reliability of those who look at the reports, as there appears to be no results from past complaints. He is considering placing a call to Action Line. The lack of time at dialysis is harmful to the client, and the PCA says that TheHandi-Van will be held accountable.

Status:	COMPLTD	**Report Number:**	P-010856PT
Needs Response:	Y	**VIC/DTS/PTD:**	
Due Date:		**Date Received:**	08/07/2012
Documented:	08/07/2012	**Time Received:**	09:33
Completed:	08/10/2012	**Received By:**	

OAHU TRANSIT SERVICES, INC.

INQUIRY ON CITY BUS SERVICE

Response/Action

Please apologize to Customer [redacted] and PCA: I interviewed Dispatcher [redacted] on Wednesday, August 11, 2012 to discuss possible solutions to servicing her sister better.

I told [redacted] that we already met with ProCare and discusses the possiblility of ProCare assigning the 5:00am pick ups in the Waimanalo area.

Ms. [redacted] stated that there are more people in Waimanalo riding early in the morning, however, we only have 1 allocated vehicle/route.

Unfortunately, at this time, we will not be able to add any additional service due to low vehicle availability. We could look at the possibility of assigning [redacted] to TheCab, althgough we are overbooked at 5:00am with TheCab also.

Action Officer: [redacted] **Date:** 08/09/2012
Director of Service Delivery

Reviewed By: [redacted] **Date:** 08/10/2012
Customer Service Supervisor, Paratransit Services

Comments

On Friday, August 10, 2012, [redacted] was contacted and relayed to him was the follow-up provided by [redacted], Director of Service Delivery. He was informed that possible solutions are being looked at to better service those attending dialysis. Also, at this time our supplementary taxi service is booked.

Run Date: 08/23/2012
Run Time: 7:43:24

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2008 - 12/31/2008

MonthYear	Jan 08	Feb 08	Mar 08	Apr 08	May 08	Jun 08	Jul 08	Aug 08	Sep 08	Oct 08	Nov 08	Dec 08	Total	AV.Day/CSR
A - Commendations	2	3	7	4	6	1	6	9	2	9	5	5	59	7
00 - General Commendations (non-specific to any operator)	0	0	0	0	0	0	0	0	1	0	0	2	3	2
01 - Polite, courteous, reliable, safe, always on-time (specific operator)	1	2	6	3	3	1	5	6	0	5	1	2	35	1
02 - Cool, professional manner when dealing with a situation, event or person	0	0	0	1	0	0	0	0	0	1	0	0	2	1
03 - Went beyond the call of duty (specific operator)	0	0	0	0	1	0	0	2	0	0	0	0	3	1
04 - Very good driver (specific operator)	0	0	0	0	0	0	0	0	0	2	0	0	2	1
08 - Complement to non-driver staff	0	0	0	0	0	0	1	0	0	0	0	0	1	1
11 - General Commendation - Dispatch/Reservations	1	1	1	0	2	0	0	1	1	1	4	1	13	29
B - Schedule Problems -- not attributable to bus operators	0	0	0	0	0	0	0	0	1	0	0	2	3	1
01 - Route is always late	0	0	0	0	0	0	0	0	1	0	0	0	1	1
99 - Other Schedule Problem - not attributable to bus/van operators NOC	0	0	0	0	0	0	0	0	0	0	0	2	2	1
C - Poor Attitude of Driver	0	0	1	0	2	1	1	0	2	0	0	0	7	72
01 - General poor attitude of a specific driver (rude, unresponsive, etc)	0	0	0	0	1	0	0	0	0	0	0	0	1	1
03 - General rude behavior by operator	0	0	1	0	1	1	1	0	1	0	0	0	5	101
05 - Lack of roadway courtesy (horn use, won't let customer in, blocks drivewa	0	0	0	0	0	0	0	0	1	0	0	0	1	1
D - Harassment of passengers/others by OTS employee (Possible l	0	0	0	0	0	0	0	0	1	0	0	0	1	2
01 - Assault/Physical incident/Inappropriate touching	0	0	0	0	0	0	0	0	1	0	0	0	1	2
E - Unsafe Vehicle Operations	0	1	0	2	1	1	1	0	3	2	0	0	11	93
00 - General safety complaint against non-specific employees	0	0	0	0	0	0	1	0	0	0	0	0	1	351
01 - Speeding	0	1	0	1	0	1	0	0	1	2	0	0	6	92
03 - Panic or sudden abrupt stop, tailgating	0	0	0	1	0	0	0	0	0	0	0	0	1	2
11 - Almost hit pedestrian; drives too close to pedestrians; drives too close to b	0	0	0	0	0	0	0	0	1	0	0	0	1	88
99 - Other unsafe vehicle operation NOC	0	0	0	0	1	0	0	0	1	0	0	0	2	17
F - Route and Schedule Issues	0	0	0	0	0	0	0	0	0	1	0	0	1	2
99 - Other Route and Schedule Issue NOC	0	0	0	0	0	0	0	0	0	1	0	0	1	2
G - Violations of Specific Policies	0	0	0	0	0	0	0	0	0	3	1	1	5	1
00 - General Policy Violation (non-specific to any operator)	0	0	0	0	0	0	0	0	0	2	0	1	3	1
99 - Other policy violations NOC	0	0	0	0	0	0	0	0	0	1	1	0	2	2
K - Complaints about non-operator transit staff	0	0	0	0	0	0	0	0	0	0	1	0	1	4
07 - Phone Etiquette	0	0	0	0	0	0	0	0	0	0	1	0	1	4
P - Unique to Paratransit Services	10	4	11	16	1	2	8	4	3	4	12	1	76	38
01 - Late Pick-Up	9	1	2	1	0	0	1	0	1	0	6	0	21	69
02 - Missed Pick-Up	0	0	0	3	0	0	0	0	0	0	0	0	3	43

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2008 - 12/31/2008

MonthYear	Jan 08	Feb 08	Mar 08	Apr 08	May 08	Jun 08	Jul 08	Aug 08	Sep 08	Oct 08	Nov 08	Dec 08	Total	AV.Day/CSR
04 - No Show	1	0	1	3	0	1	1	0	0	1	0	0	8	33
05 - Unnecessary Traveling Time	0	0	0	1	0	0	0	0	0	0	0	0	1	22
06 - Wrong Drop-Off Location	0	0	0	0	0	1	0	0	0	0	0	0	1	52
07 - Wrong Pick-Up Location	0	0	0	0	0	0	0	1	0	0	0	0	1	1
08 - Pick-up and Drop-off	0	0	2	2	0	0	1	0	0	1	0	0	6	40
09 - Route Infraction	0	0	0	0	0	0	0	0	0	1	0	0	1	2
11 - Taxi - General Complaint	0	0	0	0	0	0	0	0	0	1	0	0	1	2
99 - Other Issue Unique to Paratransit Services NOC	0	3	6	6	1	0	5	3	2	0	6	1	33	22
Grand Total	**12**	**8**	**19**	**22**	**10**	**5**	**16**	**13**	**12**	**19**	**19**	**9**	**164**	**30**

Run Date: 08/23/2012
Run Time: 7:44:57

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2009 - 12/31/2009

MonthYear	Jan 09	Feb 09	Mar 09	Apr 09	May 09	Jun 09	Jul 09	Aug 09	Sep 09	Oct 09	Nov 09	Dec 09	Total	AV.Day/CSR
A - Commendations	9	3	4	10	3	18	8	8	7	4	1	18	93	9
00 - General Commendations (non-specific to any operator)	0	0	0	2	0	1	1	0	0	0	0	1	5	10
01 - Polite, courteous, reliable, safe, always on-time (specific operator)	7	2	3	6	2	10	5	5	4	3	1	7	55	10
03 - Went beyond the call of duty (specific operator)	1	0	1	0	0	0	1	2	0	0	0	1	6	10
04 - Very good driver (specific operator)	0	0	0	0	0	2	0	0	0	0	0	0	2	7
05 - Special consideration for elderly or disabled (specific operator)	1	1	0	0	0	0	0	0	1	1	0	0	4	10
11 - General Commendation - Dispatch/Reservations	0	0	0	2	1	5	1	1	2	0	0	9	21	5
C - Poor Attitude of Driver	1	0	0	0	0	2	3	0	0	5	3	5	19	21
00 - General poor attitude of all drivers – non specific	0	0	0	0	0	1	0	0	0	0	0	0	1	26
01 - General poor attitude of a specific driver (rude, unresponsive, etc)	0	0	0	0	0	1	0	0	0	4	2	1	8	25
03 - General rude behavior by operator	1	0	0	0	0	0	1	0	0	1	1	2	6	19
05 - Lack of roadway courtesy (horn use, won't let customer in, blocks drivewa	0	0	0	0	0	0	0	0	0	0	0	1	1	11
06 - Failed to properly assist customer	0	0	0	0	0	0	1	0	0	0	0	0	1	23
99 - Other Poor Attitude of Driver NOC	0	0	0	0	0	0	1	0	0	0	0	1	2	19
D - Harassment of passengers/others by OTS employee (Possible l	1	0	0	0	0	0	0	0	0	0	0	0	1	14
99 - Other Harassment of passengers/others by OTS employee	1	0	0	0	0	0	0	0	0	0	0	0	1	14
E - Unsafe Vehicle Operations	1	4	5	2	4	12	5	3	6	7	2	4	55	16
00 - General safety complaint against non-specific employees	0	0	1	0	0	0	0	0	0	0	0	0	1	1
01 - Speeding	1	1	1	0	1	0	1	0	2	2	1	1	11	22
04 - Traffic lights and stop signs (running red or yellow light)	0	2	0	0	0	0	1	1	0	1	0	0	5	6
05 - Unsafe merging (cutting vehicle off – forcing way into lane, etc; faihure t	0	0	2	1	2	2	1	0	0	1	0	1	10	13
06 - Unnecessary or unsafe lane changing	0	1	0	0	0	0	0	1	1	1	0	0	4	14
07 - Improper unsafe boarding/alighting (loading in street, not curbing bus, n	0	0	0	0	0	0	0	0	0	1	0	1	2	19
10 - Inappropriate Cell phone use	0	0	0	0	0	1	0	0	0	0	0	0	1	11
11 - Almost hit pedestrian; drives too close to pedestrians; drives too close to b	0	0	1	1	0	2	2	0	0	0	0	0	6	11
99 - Other unsafe vehicle operation NOC	0	0	0	0	1	7	0	1	3	1	1	1	15	19
F - Route and Schedule Issues	0	0	0	0	0	1	0	0	0	2	2	3	8	23
01 - Arrived at stop early or bus never arrived (one or two instances only)	0	0	0	0	0	0	0	0	0	0	1	0	1	28
05 - Driver pass-ups	0	0	0	0	0	1	0	0	0	0	0	1	2	14
06 - Driver went off-route/didn't know route	0	0	0	0	0	0	0	0	0	1	0	1	2	21
08 - Unnecessary delay of service	0	0	0	0	0	0	0	0	0	1	0	0	1	22
09 - Left bus unattended	0	0	0	0	0	0	0	0	0	0	0	1	1	25
99 - Other Route and Schedule Issue NOC	0	0	0	0	0	0	0	0	0	0	1	0	1	39

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2009 - 12/31/2009

MonthYear	Jan 09	Feb 09	Mar 09	Apr 09	May 09	Jun 09	Jul 09	Aug 09	Sep 09	Oct 09	Nov 09	Dec 09	Total	AV.Day/CSR
G - Violations of Specific Policies	0	0	0	0	0	2	2	0	1	1	1	0	7	14
00 - General Policy Violation (non-specific to any operator)	0	0	0	0	0	0	1	0	0	0	1	0	2	13
02 - No smoking ordinance	0	0	0	0	0	0	1	0	0	0	0	0	1	19
13 - Seat Belt Violation	0	0	0	0	0	1	0	0	0	0	0	0	1	7
99 - Other policy violations NOC	0	0	0	0	0	1	0	0	1	1	0	0	3	17
H - Individuals with Disabilities Requirements	0	0	0	0	0	1	0	0	0	0	0	0	1	3
04 - Securement of mobility devices/4-pt Tie-down	0	0	0	0	0	1	0	0	0	0	0	0	1	3
L - General Transit Policy Complaints	0	0	0	0	0	0	0	0	0	0	1	0	1	12
01 - Routes and Schedules (e.g. always serving visitors, etc)	0	0	0	0	0	0	0	0	0	0	1	0	1	12
P - Unique to Paratransit Services	1	6	8	3	3	9	5	4	11	27	45	27	149	17
01 - Late Pick-Up	0	1	2	1	0	0	0	0	2	2	9	4	21	17
04 - No Show	0	0	0	0	0	0	1	1	0	1	0	1	4	22
05 - Unnecessary Traveling Time	0	0	0	0	0	0	0	0	0	2	1	2	5	26
06 - Wrong Drop-Off Location	0	0	0	0	0	0	0	0	2	0	2	0	4	17
07 - Wrong Pick-Up Location	0	0	1	1	0	0	1	1	0	0	0	1	5	11
08 - Pick-up and Drop-off	0	0	0	0	1	0	1	1	1	0	0	0	4	20
11 - Taxi - General Complaint	0	0	0	0	0	0	0	0	0	0	10	4	14	24
12 - Eligibility	0	0	0	0	0	0	0	0	0	0	7	5	12	1
99 - Other Issue Unique to Paratransit Services NOC	1	5	5	1	2	9	2	1	6	22	16	10	80	17
Grand Total	13	13	17	15	10	45	23	15	25	46	55	57	334	15

Run Date: 08/23/2012
Run Time: 7:45:44

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2010 - 12/31/2010

MonthYear	Jan 10	Feb 10	Mar 10	Apr 10	May 10	Jun 10	Jul 10	Aug 10	Sep 10	Oct 10	Nov 10	Dec 10	Total	AV.Day/CSR
A - Commendations	8	9	13	17	22	4	5	12	3	20	5	2	120	24
00 - General Commendations (non-specific to any operator)	1	2	0	0	1	0	2	0	0	3	1	0	10	24
01 - Polite, courteous, reliable, safe, always on-time (specific operator)	5	3	6	6	12	1	2	7	2	8	1	0	53	26
02 - Cool, professional manner when dealing with a situation, event or person	0	1	0	1	0	0	0	0	0	0	1	1	4	19
03 - Went beyond the call of duty (specific operator)	0	1	1	0	0	0	0	0	0	3	0	0	5	43
04 - Very good driver (specific operator)	0	0	3	0	1	2	1	0	0	6	0	1	14	28
05 - Special consideration for elderly or disabled (specific operator)	0	0	0	0	0	0	0	0	0	0	1	0	1	42
08 - Complement to non-driver staff	0	0	0	2	0	1	0	0	0	0	0	0	3	82
11 - General Commendation - Dispatch/Reservations	2	2	3	8	8	0	0	5	1	0	1	0	30	11
B - Schedule Problems – not attributable to bus operators	0	0	0	0	0	0	0	0	0	0	0	1	1	10
07 - Request to make a schedule change	0	0	0	0	0	0	0	0	0	0	0	1	1	10
C - Poor Attitude of Driver	2	7	4	4	3	3	2	7	2	4	4	4	46	29
00 - General poor attitude of all drivers – non specific	0	0	0	0	0	0	0	0	0	0	0	1	1	11
01 - General poor attitude of a specific driver (rude, unresponsive, etc)	1	3	2	3	1	1	1	1	0	2	1	1	17	28
02 - Failed to answer questions or give full, or accurate information	0	0	0	0	0	0	0	0	0	1	0	0	1	57
03 - General rude behavior by operator	0	2	1	0	2	2	0	3	1	1	1	1	14	27
04 - Overbearing attitude in enforcement of rules (not the rule but the way the	1	0	0	0	0	0	0	0	0	0	1	0	2	31
05 - Lack of roadway courtesy (horn use, won't let customer in, blocks drivewa	0	0	0	0	0	0	1	0	0	0	0	0	1	39
06 - Failed to properly assist customer	0	0	0	1	0	0	0	3	1	0	1	1	7	28
99 - Other Poor Attitude of Driver NOC	0	2	1	0	0	0	0	0	0	0	0	0	3	38
D - Harassment of passengers/others by OTS employee (Possible l	1	0	0	0	0	0	1	0	0	1	1	0	4	38
02 - Verbal harassment (swearing, ridiculing, offensive language, inappropriat	0	0	0	0	0	0	0	0	0	1	0	0	1	34
05 - Disability harassment/disability discrimination	1	0	0	0	0	0	1	0	0	0	1	0	3	39
E - Unsafe Vehicle Operations	11	6	4	7	7	5	4	7	9	8	8	6	82	26
00 - General safety complaint against non-specific employees	1	0	0	0	0	0	0	0	0	1	0	0	2	36
01 - Speeding	1	0	2	0	0	1	2	0	1	5	4	2	18	33
02 - Abrupt starts and stops (generally)	0	0	0	0	0	0	0	0	1	0	0	0	1	15
04 - Traffic lights and stop signs (running red or yellow light)	0	1	0	1	0	1	0	1	3	0	0	1	8	21
05 - Unsafe merging (cutting vehicle off – forcing way into lane, etc; failure t	4	1	0	3	0	1	1	3	2	1	1	2	19	22
06 - Unnecessary or unsafe lane changing	1	0	0	0	0	0	0	1	0	0	0	0	2	29
07 - Improper unsafe boarding/alighting (loading in street, not curbing bus, n	1	0	0	0	0	0	1	1	0	0	1	1	5	27
08 - Driver Fitness for duty, too sleepy, appears to be under the influence, etc.	1	0	1	0	0	0	0	0	0	0	0	0	2	38
09 - Driver distractions (Newspaper, walkman radio, etc.)	0	0	0	0	0	0	0	0	1	0	0	0	1	18

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2010 - 12/31/2010

MonthYear	Jan 10	Feb 10	Mar 10	Apr 10	May 10	Jun 10	Jul 10	Aug 10	Sep 10	Oct 10	Nov 10	Dec 10	Total	AV.Day/CSR
10 - Inappropriate Cell phone use	1	0	1	0	0	0	0	0	0	0	0	0	2	45
11 - Almost hit pedestrian; drives too close to pedestrians; drives too close to b	0	0	0	1	1	0	0	0	1	0	1	0	4	21
99 - Other unsafe vehicle operation NOC	1	4	0	2	6	2	0	1	0	1	1	0	18	20
F - Route and Schedule Issues	0	1	0	1	0	1	0	0	2	2	0	0	7	28
01 - Arrived at stop early or bus never arrived (one or two instances only)	0	0	0	1	0	0	0	0	0	0	0	0	1	26
04 - Driver is always late	0	0	0	0	0	0	0	0	0	1	0	0	1	22
05 - Driver pass-ups	0	0	0	0	0	0	0	0	1	1	0	0	2	33
06 - Driver went off-route/didn't know route	0	1	0	0	0	0	0	0	0	0	0	0	1	36
08 - Unnecessary delay of service	0	0	0	0	0	1	0	0	1	0	0	0	2	23
G - Violations of Specific Policies	0	1	1	1	3	0	3	3	6	2	1	0	21	27
00 - General Policy Violation (non-specific to any operator)	0	0	0	1	0	0	1	0	1	0	1	0	4	25
02 - No smoking ordinance	0	0	0	0	0	0	1	0	1	0	0	0	2	34
03 - Issues about radios/audio devices/too loud etc.	0	0	0	0	0	0	0	0	1	0	0	0	1	13
05 - Failed to assist passenger in need; failed to report injured passenger	0	1	1	0	1	0	0	0	0	0	0	0	3	33
09 - Unnecessary talking or fraternization with passengers	0	0	0	0	0	0	0	0	0	1	0	0	1	66
18 - Inappropriate behavior (urinating, etc.)	0	0	0	0	0	0	0	1	1	0	0	0	2	15
99 - Other policy violations NOC	0	0	0	0	2	0	1	2	2	1	0	0	8	24
H - Individuals with Disabilities Requirements	0	0	0	1	0	0	0	1	1	2	0	0	5	35
01 - Kneeling Issues	0	0	0	0	0	0	0	0	1	0	0	0	1	18
04 - Securement of mobility devices/4-pt Tie-down	0	0	0	1	0	0	0	0	0	1	0	0	2	34
08 - Failure to assist passenger secure priority seat.	0	0	0	0	0	0	0	1	0	0	0	0	1	43
99 - Other ADA issue NOC	0	0	0	0	0	0	0	0	0	1	0	0	1	47
J - Maintenance of Equipment	0	1	0	0	0	0	0	0	0	0	0	0	1	29
99 - Other Maintenance problem/general maintenance problem	0	1	0	0	0	0	0	0	0	0	0	0	1	29
K - Complaints about non-operator transit staff	0	1	1	0	0	0	0	0	1	2	0	1	6	38
05 - Complaints against Paratransit Dispatch/Reservations	0	1	1	0	0	0	0	0	0	0	0	0	2	20
07 - Phone Etiquette	0	0	0	0	0	0	0	0	1	1	0	1	3	37
99 - Other complaints about non-operator staff NOC	0	0	0	0	0	0	0	0	0	1	0	0	1	76
P - Unique to Paratransit Services	31	32	41	30	28	22	10	18	13	22	25	34	306	33
01 - Late Pick-Up	5	5	4	7	7	3	0	0	0	1	2	7	41	28
02 - Missed Pick-Up	0	0	0	1	0	0	0	0	0	0	0	0	1	38
03 - Departing Before Scheduled Time	0	0	0	0	0	0	0	0	0	1	0	0	1	65
04 - No Show	2	0	2	2	1	1	0	1	1	0	0	0	10	24

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2010 - 12/31/2010

MonthYear	Jan 10	Feb 10	Mar 10	Apr 10	May 10	Jun 10	Jul 10	Aug 10	Sep 10	Oct 10	Nov 10	Dec 10	Total	AV.Day/CSR
05 - Unnecessary Traveling Time	1	0	3	2	3	2	0	2	0	1	0	0	14	17
06 - Wrong Drop-Off Location	1	2	0	0	0	0	0	0	0	0	0	2	5	19
07 - Wrong Pick-Up Location	1	0	1	1	0	0	0	0	0	0	0	0	3	35
08 - Pick-up and Drop-off	0	0	2	0	0	1	3	0	0	0	0	0	6	30
11 - Taxi - General Complaint	5	10	11	14	5	5	2	9	7	5	11	9	93	43
99 - Other Issue Unique to Paratransit Services NOC	16	15	18	3	12	10	5	6	5	14	12	16	132	29
Grand Total	**53**	**58**	**64**	**61**	**63**	**35**	**25**	**48**	**37**	**63**	**44**	**48**	**599**	**30**

Run Date: 08/23/2012
Run Time: 7:47:55

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2011 - 12/31/2011

MonthYear	Jan 11	Feb 11	Mar 11	Apr 11	May 11	Jun 11	Jul 11	Aug 11	Sep 11	Oct 11	Nov 11	Dec 11	Total	AV.Day/CSR
A - Commendations	5	12	5	13	21	64	13	44	35	64	42	19	337	11
00 - General Commendations (non-specific to any operator)	0	0	0	1	1	15	0	0	4	0	1	1	23	4
01 - Polite, courteous, reliable, safe, always on-time (specific operator)	2	8	4	3	10	3	0	0	1	2	4	0	37	18
02 - Cool, professional manner when dealing with a situation, event or person	1	0	0	1	3	0	0	0	0	0	0	0	5	23
03 - Went beyond the call of duty (specific operator)	0	3	0	5	3	2	0	2	3	3	1	0	22	15
04 - Very good driver (specific operator)	1	0	1	1	1	29	7	28	22	33	25	14	162	11
05 - Special consideration for elderly or disabled (specific operator)	0	0	0	2	2	1	2	2	0	0	2	0	11	10
06 - Good Vehicle Maintenance – good maintenance – clean buses -good A/	0	0	0	0	0	0	1	0	0	0	0	0	1	7
07 - Other bus operator complement	0	0	0	0	0	0	0	0	0	10	0	0	10	7
08 - Complement to non-driver staff	0	0	0	0	0	2	0	5	5	15	5	3	35	6
10 - Taxi - General Commendation	0	0	0	0	0	1	1	0	0	1	2	1	6	6
11 - General Commendation - Dispatch/Reservations	1	1	0	0	1	11	2	7	0	0	2	0	25	8
B - Schedule Problems – not attributable to bus operators	1	0	0	1	13	6	0	0	0	0	0	0	21	8
01 - Route is always late	0	0	0	0	4	5	0	0	0	0	0	0	9	5
05 - Bus was overloaded (single instance only – not reported as regular proble	0	0	0	0	2	0	0	0	0	0	0	0	2	2
07 - Request to make a schedule change	0	0	0	0	1	0	0	0	0	0	0	0	1	13
99 - Other Schedule Problem - not attributable to bus/van operators NOC	1	0	0	1	3	1	0	0	0	0	0	0	6	12
08 - Trip Planning Mechanism	0	0	0	0	3	0	0	0	0	0	0	0	3	12
C - Poor Attitude of Driver	3	1	4	8	6	6	7	4	12	24	11	17	103	21
00 - General poor attitude of all drivers – non specific	0	1	0	1	0	0	0	0	1	1	0	0	4	19
01 - General poor attitude of a specific driver (rude, unresponsive, etc)	1	0	1	2	5	5	5	3	5	4	6	11	48	20
02 - Failed to answer questions or give full, or accurate information	0	0	0	1	0	0	0	0	1	0	0	2	4	21
03 - General rude behavior by operator	1	0	3	1	1	1	2	1	0	7	4	0	21	26
04 - Overbearing attitude in enforcement of rules (not the rule but the way the	1	0	0	0	0	0	0	0	0	0	0	0	1	25
05 - Lack of roadway courtesy (horn use, won't let customer in, blocks drivewa	0	0	0	3	0	0	0	0	1	5	0	1	10	17
06 - Failed to properly assist customer	0	0	0	0	0	0	0	0	4	7	1	3	15	20
D - Harassment of passengers/others by OTS employee (Possible I	0	0	0	0	1	1	0	0	0	1	0	0	3	10
01 - Assault/Physical incident/Inappropriate touching	0	0	0	0	0	1	0	0	0	0	0	0	1	9
02 - Verbal harassment (swearing, ridiculing, offensive language, inappropriat	0	0	0	0	1	0	0	0	0	0	0	0	1	18
03 - Sexual harassment/Sex discrimination	0	0	0	0	0	0	0	0	0	1	0	0	1	2
E - Unsafe Vehicle Operations	5	4	4	5	14	8	9	12	11	13	11	11	107	19
00 - General safety complaint against non-specific employees	0	0	0	1	2	1	1	1	2	2	0	1	11	29
01 - Speeding	1	2	2	0	1	2	1	3	1	0	5	2	20	14

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2011 - 12/31/2011

MonthYear	Jan 11	Feb 11	Mar 11	Apr 11	May 11	Jun 11	Jul 11	Aug 11	Sep 11	Oct 11	Nov 11	Dec 11	Total	AV.Day/CSR
02 - Abrupt starts and stops (generally)	0	0	0	1	0	0	0	0	0	0	0	0	1	11
03 - Panic or sudden abrupt stop, tailgating	0	1	0	0	1	1	1	1	0	0	0	0	5	16
04 - Traffic lights and stop signs (running red or yellow light)	1	0	0	0	2	0	0	0	1	3	0	0	7	25
05 - Unsafe merging (cutting vehicle off – forcing way into lane, etc; failure t	0	1	2	1	3	2	1	1	0	3	2	3	19	17
06 - Unnecessary or unsafe lane changing	2	0	0	0	1	0	1	1	0	1	0	2	8	20
07 - Improper unsafe boarding/alighting (loading in street, not curbing bus, n	0	0	0	1	0	1	1	0	2	0	1	1	7	15
08 - Driver Fitness for duty, too sleepy, appears to be under the influence, etc.	0	0	0	0	1	0	0	0	0	0	0	0	1	4
10 - Inappropriate Cell phone use	0	0	0	1	0	0	1	0	2	3	1	1	9	18
11 - Almost hit pedestrian; drives too close to pedestrians; drives too close to b	1	0	0	0	0	0	0	1	1	0	1	0	4	15
99 - Other unsafe vehicle operation NOC	0	0	0	0	3	1	2	4	2	1	1	1	15	22
F - Route and Schedule Issues	**0**	**1**	**1**	**8**	**5**	**2**	**3**	**1**	**2**	**2**	**3**	**3**	**31**	**17**
01 - Arrived at stop early or bus never arrived (one or two instances only)	0	0	0	0	0	0	2	0	0	0	0	0	2	12
02 - Arrived at stop late (one or two instances only)	0	0	0	0	0	1	0	0	0	0	0	0	1	3
04 - Driver is always late	0	0	0	5	1	0	0	0	0	0	1	0	7	23
05 - Driver pass-ups	0	0	1	0	0	0	0	0	0	0	0	0	1	14
06 - Driver went off-route/didn't know route	0	1	0	1	0	1	0	0	0	0	1	1	5	16
08 - Unnecessary delay of service	0	0	0	1	2	0	0	0	0	0	0	1	4	14
10 - Passes passenger's intended bus stop, Refused to allow passenger to boar	0	0	0	0	0	0	0	0	0	0	1	0	1	5
12 - Operates on wrong schedule	0	0	0	0	0	0	0	0	0	0	0	1	1	5
13 - Excessive running of bus or vans engines at terminals or staging areas.	0	0	0	0	1	0	0	1	0	2	0	0	4	22
99 - Other Route and Schedule Issue NOC	0	0	0	1	1	0	1	0	2	0	0	0	5	19
G - Violations of Specific Policies	**0**	**1**	**2**	**4**	**1**	**0**	**3**	**0**	**4**	**0**	**1**	**3**	**19**	**11**
00 - General Policy Violation (non-specific to any operator)	0	0	0	0	0	0	1	0	0	0	1	1	3	13
03 - Issues about radios/audio devices/too loud etc.	0	0	1	0	0	0	0	0	0	0	0	0	1	14
04 - Harassment/assault of passenger by other passengers, fights between pass	0	0	0	0	1	0	1	0	2	0	0	0	4	11
05 - Failed to assist passenger in need; failed to report injured passenger	0	0	1	0	0	0	0	0	0	0	0	0	1	17
07 - Driver issues at bus terminals or staging areas (loud noise, congregating, e	0	0	0	4	0	0	0	0	1	0	0	1	6	13
13 - Seat Belt Violation	0	1	0	0	0	0	0	0	0	0	0	0	1	5
17 - Damage to private property (lawns, gardens, mailboxes, etc included)	0	0	0	0	0	0	0	0	1	0	0	0	1	8
18 - Inappropriate behavior (urinating, etc.)	0	0	0	0	0	0	1	0	0	0	0	1	2	5
H - Individuals with Disabilities Requirements	**0**	**0**	**0**	**0**	**1**	**1**	**0**	**0**	**0**	**0**	**1**	**0**	**3**	**11**
02 - Lift issue/Claiming lifts inoperable	0	0	0	0	0	1	0	0	0	0	1	0	2	8
99 - Other ADA issue NOC	0	0	0	0	1	0	0	0	0	0	0	0	1	16

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2011 - 12/31/2011

MonthYear	Jan 11	Feb 11	Mar 11	Apr 11	May 11	Jun 11	Jul 11	Aug 11	Sep 11	Oct 11	Nov 11	Dec 11	Total	AV.Day/CSR
J - Maintenance of Equipment	0	0	0	1	0	0	0	1	2	2	0	3	9	3
02 - AC system too hot	0	0	0	0	0	0	0	1	0	0	0	0	1	1
09 - Buses/vans dirty	0	0	0	0	0	0	0	0	0	0	0	1	1	3
99 - Other Maintenance problem/general maintenance problem	0	0	0	1	0	0	0	0	2	2	0	2	7	3
K - Complaints about non-operator transit staff	1	0	0	0	3	0	1	14	3	12	9	10	53	11
04 - Complaints about Other Transit Staff	0	0	0	0	1	0	0	0	0	0	1	0	2	8
05 - Complaints against Paratransit Dispatch/Reservations	1	0	0	0	1	0	1	6	1	5	2	4	21	14
06 - Busy Phones	0	0	0	0	0	0	0	2	0	1	0	2	5	5
07 - Phone Etiquette	0	0	0	0	0	0	0	0	1	2	2	2	7	12
09 - Reservation Error	0	0	0	0	0	0	0	6	1	4	4	2	17	8
99 - Other complaints about non-operator staff NOC	0	0	0	0	1	0	0	0	0	0	0	0	1	1
L - General Transit Policy Complaints	0	0	0	0	6	0	0	0	1	0	0	1	8	38
03 - Baggage rules	0	0	0	0	0	0	0	0	1	0	0	0	1	35
06 - General transit policy complaint	0	0	0	0	6	0	0	0	0	0	0	0	6	44
99 - Other General Transit Policy Issue NOC	0	0	0	0	0	0	0	0	0	0	0	1	1	6
P - Unique to Paratransit Services	10	12	16	12	11	34	85	102	73	76	82	83	596	12
01 - Late Pick-Up	3	1	5	0	5	5	42	61	47	35	44	45	293	13
02 - Missed Pick-Up	0	0	0	0	0	0	2	4	0	0	0	0	6	12
04 - No Show	0	0	0	0	1	0	0	0	3	2	2	4	12	11
05 - Unnecessary Traveling Time	0	0	0	0	0	0	1	2	4	1	0	0	8	7
06 - Wrong Drop-Off Location	1	0	0	1	0	1	2	0	0	0	0	3	8	18
07 - Wrong Pick-Up Location	1	0	0	0	0	1	3	0	0	0	0	1	6	15
08 - Pick-up and Drop-off	0	1	2	0	0	1	8	2	6	6	8	7	41	11
09 - Route Infraction	0	0	0	0	0	0	4	8	3	10	1	9	35	10
10 - ETA/Confirming Information	0	0	0	1	0	0	0	0	1	0	1	0	3	11
11 - Taxi - General Complaint	1	5	3	8	3	12	18	13	8	21	23	14	129	11
12 - Eligibility	0	0	0	1	0	0	0	0	0	0	0	0	1	3
99 - Other Issue Unique to Paratransit Services NOC	4	5	6	1	2	14	5	12	1	1	3	0	54	14
Grand Total	25	31	32	52	82	122	121	178	143	194	160	150	1,290	13

Run Date: 08/23/2012
Run Time: 7:51:53

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2012 - 12/31/2012

MonthYear	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12	Total	AV.Day/CSR
A - Commendations	69	48	31	18	23	78	19	54	0	0	0	0	340	5
00 - General Commendations (non-specific to any operator)	0	0	1	1	0	1	0	2	0	0	0	0	5	3
01 - Polite, courteous, reliable, safe, always on-time (specific operator)	2	1	1	0	1	0	0	1	0	0	0	0	6	3
02 - Cool, professional manner when dealing with a situation, event or person	0	2	0	0	0	0	0	0	0	0	0	0	2	3
03 - Went beyond the call of duty (specific operator)	1	0	0	0	0	0	0	22	0	0	0	0	23	7
04 - Very good driver (specific operator)	47	27	21	13	17	56	17	26	0	0	0	0	224	4
05 - Special consideration for elderly or disabled (specific operator)	0	0	0	1	0	0	0	0	0	0	0	0	1	2
08 - Complement to non-driver staff	19	18	6	2	2	21	2	1	0	0	0	0	71	8
10 - Taxi - General Commendation	0	0	1	1	1	0	0	2	0	0	0	0	5	6
11 - General Commendation - Dispatch/Reservations	0	0	1	0	2	0	0	0	0	0	0	0	3	6
B - Schedule Problems – not attributable to bus operators	0	0	0	0	0	1	0	0	0	0	0	0	1	1
06 - Request for new route; extension of route	0	0	0	0	0	1	0	0	0	0	0	0	1	1
C - Poor Attitude of Driver	8	11	4	15	15	12	15	8	0	0	0	0	88	12
00 - General poor attitude of all drivers – non specific	1	0	0	1	1	1	0	0	0	0	0	0	4	15
01 - General poor attitude of a specific driver (rude, unresponsive, etc)	3	5	2	3	1	4	4	1	0	0	0	0	23	14
02 - Failed to answer questions or give full, or accurate information	1	0	0	0	0	0	0	0	0	0	0	0	1	21
03 - General rude behavior by operator	1	1	2	2	3	2	2	1	0	0	0	0	14	11
05 - Lack of roadway courtesy (horn use, won't let customer in, blocks drivewa	1	3	0	5	2	2	3	0	0	0	0	0	16	12
06 - Failed to properly assist customer	1	2	0	3	8	3	6	6	0	0	0	0	29	10
99 - Other Poor Attitude of Driver NOC	0	0	0	1	0	0	0	0	0	0	0	0	1	27
D - Harassment of passengers/others by OTS employee (Possible l	1	0	0	0	0	0	0	1	0	0	0	0	2	1
03 - Sexual harassment/Sex discrimination	1	0	0	0	0	0	0	0	0	0	0	0	1	1
99 - Other Harassment of passengers/others by OTS employee	0	0	0	0	0	0	0	1	0	0	0	0	1	0
E - Unsafe Vehicle Operations	4	10	6	8	9	12	12	6	0	0	0	0	67	11
00 - General safety complaint against non-specific employees	0	0	0	0	0	0	1	0	0	0	0	0	1	10
01 - Speeding	0	4	0	2	2	3	1	2	0	0	0	0	14	11
02 - Abrupt starts and stops (generally)	0	0	0	0	0	1	2	1	0	0	0	0	4	13
03 - Panic or sudden abrupt stop, tailgating	0	1	0	1	1	0	0	0	0	0	0	0	3	16
04 - Traffic lights and stop signs (running red or yellow light)	1	2	1	0	2	1	1	1	0	0	0	0	9	13
05 - Unsafe merging (cutting vehicle off – forcing way into lane, etc; failure t	2	2	3	2	0	2	4	0	0	0	0	0	15	11
06 - Unnecessary or unsafe lane changing	1	0	0	0	0	0	0	0	0	0	0	0	1	6
07 - Improper unsafe boarding/alighting (loading in street, not curbing bus, n	0	1	0	3	1	0	0	0	0	0	0	0	5	12
08 - Driver Fitness for duty, too sleepy, appears to be under the influence, etc.	0	0	1	0	0	0	0	0	0	0	0	0	1	4

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2012 - 12/31/2012

MonthYear	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12	Total	AV.Day/CSR
09 - Driver distractions (Newspaper, walkman radio, etc.)	0	0	0	0	1	3	0	0	0	0	0	0	4	8
10 - Inappropriate Cell phone use	0	0	0	0	0	1	1	1	0	0	0	0	3	16
11 - Almost hit pedestrian; drives too close to pedestrians; drives too close to b	0	0	0	0	1	0	1	0	0	0	0	0	2	16
99 - Other unsafe vehicle operation NOC	0	0	1	0	1	1	1	1	0	0	0	0	5	8
F - Route and Schedule Issues	**4**	**4**	**3**	**6**	**3**	**2**	**2**	**4**	**0**	**0**	**0**	**0**	**28**	**13**
01 - Arrived at stop early or bus never arrived (one or two instances only)	2	0	0	0	0	2	2	0	0	0	0	0	6	13
03 - Driver is always early	0	1	1	2	0	0	0	0	0	0	0	0	4	17
04 - Driver is always late	1	0	1	0	0	0	0	1	0	0	0	0	3	22
05 - Driver pass-ups	0	0	0	2	0	0	0	0	0	0	0	0	2	9
06 - Driver went off-route/didn't know route	1	1	0	1	0	0	0	3	0	0	0	0	6	11
07 - Driver failed to load more passengers when more room available in the b	0	1	0	0	0	0	0	0	0	0	0	0	1	6
08 - Unnecessary delay of service	0	0	1	0	0	0	0	0	0	0	0	0	1	9
09 - Left bus unattended	0	0	0	0	1	0	0	0	0	0	0	0	1	7
12 - Operates on wrong schedule	0	0	0	1	1	0	0	0	0	0	0	0	2	9
13 - Excessive running of bus or vans engines at terminals or staging areas.	0	0	0	0	1	0	0	0	0	0	0	0	1	12
99 - Other Route and Schedule Issue NOC	0	1	0	0	0	0	0	0	0	0	0	0	1	14
G - Violations of Specific Policies	**5**	**3**	**1**	**3**	**0**	**1**	**2**	**2**	**0**	**0**	**0**	**0**	**17**	**9**
01 - No eating/drinking ordinance	0	0	0	1	0	0	0	0	0	0	0	0	1	6
03 - Issues about radios/audio devices/too loud etc.	0	0	0	0	0	0	1	0	0	0	0	0	1	11
07 - Driver issues at bus terminals or staging areas (loud noise, congregating, e	0	2	0	1	0	0	1	2	0	0	0	0	6	5
12 - Fares, passes and transfers	1	1	0	0	0	0	0	0	0	0	0	0	2	13
17 - Damage to private property (lawns, gardens, mailboxes, etc included)	2	0	0	0	0	0	0	0	0	0	0	0	2	21
99 - Other policy violations NOC	2	0	1	1	0	1	0	0	0	0	0	0	5	8
H - Individuals with Disabilities Requirements	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**1**	**13**
04 - Securement of mobility devices/4-pt Tie-down	1	0	0	0	0	0	0	0	0	0	0	0	1	13
J - Maintenance of Equipment	**1**	**0**	**0**	**0**	**1**	**2**	**2**	**1**	**0**	**0**	**0**	**0**	**7**	**7**
03 - Inoperable lifts	0	0	0	0	1	0	0	0	0	0	0	0	1	7
09 - Buses/vans dirty	0	0	0	0	0	1	0	0	0	0	0	0	1	2
99 - Other Maintenance problem/general maintenance problem	1	0	0	0	0	1	2	1	0	0	0	0	5	8
K - Complaints about non-operator transit staff	**5**	**2**	**7**	**9**	**15**	**11**	**8**	**9**	**0**	**0**	**0**	**0**	**66**	**11**
05 - Complaints against Paratransit Dispatch/Reservations	3	0	1	3	12	5	0	3	0	0	0	0	27	16
06 - Busy Phones	1	0	0	0	0	0	0	0	0	0	0	0	1	15
07 - Phone Etiquette	0	1	0	1	0	0	3	0	0	0	0	0	5	12

Oahu Transit Services, Inc.
SUMMARY OF CUSTOMER SERVICE REPORTS RECEIVED

01/01/2012 - 12/31/2012

MonthYear	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12	Total	AV.Day/CSR
08 - Scheduled Time Denied	0	0	0	0	1	0	0	0	0	0	0	0	1	8
09 - Reservation Error	1	1	6	5	2	6	5	6	0	0	0	0	32	8
P - Unique to Paratransit Services	29	25	37	52	46	37	42	55	0	0	0	0	323	12
01 - Late Pick-Up	11	11	16	29	27	15	19	25	0	0	0	0	153	13
02 - Missed Pick-Up	1	0	0	0	0	0	0	2	0	0	0	0	3	5
04 - No Show	2	1	2	4	3	3	4	5	0	0	0	0	24	13
05 - Unnecessary Traveling Time	0	0	0	0	1	0	1	1	0	0	0	0	3	10
06 - Wrong Drop-Off Location	0	1	0	0	1	0	0	2	0	0	0	0	4	8
07 - Wrong Pick-Up Location	1	1	0	0	0	1	0	0	0	0	0	0	3	14
08 - Pick-up and Drop-off	1	0	0	2	0	0	0	2	0	0	0	0	5	11
09 - Route Infraction	2	1	7	7	3	4	6	7	0	0	0	0	37	13
10 - ETA/Confirming Information	0	0	0	0	0	0	1	0	0	0	0	0	1	8
11 - Taxi - General Complaint	9	10	8	9	11	11	9	5	0	0	0	0	72	10
99 - Other Issue Unique to Paratransit Services NOC	2	0	4	1	0	3	2	6	0	0	0	0	18	12
Grand Total	127	103	89	111	112	156	102	140	0	0	0	0	940	9

_____ By _____		HandiVan ID _____
Determination Date _____	Interview ID _____	Determination ID _____

Elig Type _____ Elig End _____ Extension ○ Yes ○ No

PCA ○ No ○ Yes Space Type _____ Deter Review _____

EXPEDITED ELIGIBILITY? ☐ Yes Explanation _____

DETER COMPLETED _____

Determination Letter Mailed _____

CATEGORY 1 - 49 CFR 37.123.(e) (1): Boarding, Riding, and Disembarking from a Fixed Route Bus

The applicant is able (with driver assistance operating the lift) to ***independently BOARD, RIDE and DISEMBARK*** from fixed route vehicles throughout the service area.

○ Always ○ Never

If marked **NEVER**, check the transit skills the applicant cannot perform due to a qualifying disability. With a reasonable level of effort and risk the applicant cannot independently:

- ☐ Be in crowded situations
- ☐ Remain oriented in noisy buses
- ☐ Climb bus steps
- ☐ Get to seat or securement area
- ☐ Stay balanced on moving bus
- ☐ Stand on moving lift
- ☐ Transfer between routes
- ☐ Act appropriately in public setting
- ☐ Remain stable in crowded buses
- ☐ Grasp handrails/pull signal cord
- ☐ Recognize destination/landmarks
- ☐ Handle fare media
- ☐ Ride in seated position
- ☐ Get onto lift in mobility device
- ☐ Get off where lift can't be deployed
- ☐ Identify correct bus to board

CATEGORY 1 - 49 CFR 37.123.(e) (1): Understanding and Navigating the Fixed Route System

The applicant is able to ***independently UNDERSTAND and NAVIGATE*** the fixed route system throughout the service area.

○ Always ○ Never

If marked **NEVER**, check the transit skills the applicant cannot perform due to a qualifying disability. With a reasonable level of effort and risk the applicant cannot independently:

- ☐ Go to unfamiliar destinations
- ☐ Exercise personal safety skills
- ☐ Seek and act on directions
- ☐ Deal with unexpected situations
- ☐ Remember directions
- ☐ Locate and recognize the right bus
- ☐ Travel safely in the community
- ☐ Orient oneself to person/place/time
- ☐ Stay on task
- ☐ Transfer between routes
- ☐ Get and remember transit system info
- ☐ Signal for stop at right location

_____ By _____ HandiVan ID _____

CATEGORY 3 - 49 CFR 37.123.(e) (3): Getting to and from a bus stop or destination

The applicant is able to ***independently GET TO AND FROM BUS STOPS AND DESTINATIONS*** throughout the service area.

○ Always ○ Never ○ Sometimes

If marked **NEVER or SOMETIMES**, check the transit skills the applicant cannot perform due to a qualifying disability. With a reasonable level of effort and risk the applicant cannot independently:

- ☐ Go four blocks on level ground
- ☐ Go up/down three six inch steps
- ☐ Go up/down long ramps
- ☐ Go around obstacles/barriers
- ☐ Go across steep driveways
- ☐ Locate the curb or curb cuts
- ☐ Locate bus stop
- ☐ Cross two lanes with no signal
- ☐ Control mobility device adequately
- ☐ Go on uneven pavement
- ☐ Go on gravel/dirt/grassy surfaces
- ☐ Wait ten minutes standing
- ☐ Go up/down a gradual hill
- ☐ Go across sloped sidewalks
- ☐ Locate pedestrian signal
- ☐ Cross misaligned intersections
- ☐ Cross four lanes with a signal

CONDITIONAL ELIGIBILITY: Issues with Architectural and Environmental Barriers

If Category 3 is marked **SOMETIMES** , check all the architectural or environmental barriers that interact with the applicant's specific impairment-related condition to prevent him/her from independently getting to and from fixed route bus stops:

- ☐ Hills/steep or long grades
- ☐ Distance to/from stops
- ☐ Rain/Hot/Cold weather
- ☐ Air pollution/haze/vog
- ☐ Excess ambient noise
- ☐ No sidewalks/rough terrain
- ☐ Low or bright light
- ☐ Crowded areas
- ☐ Undetectable objects
- ☐ Flooding
- ☐ High winds
- ☐ Busy streets/intersections
- ☐ Constant right turns on red
- ☐ Steep curbs/steps
- ☐ No curb cuts/poor curb cuts
- ☐ Bus stops without detectable poles
- ☐ No pedestrian signals
- ☐ Wide open parking lots
- ☐ Utility obstacles/construction barricades
- ☐ No detectable path of travel
- ☐ Unaligned intersections
- ☐ Curbs with no detectable warnings

RESULTS OF FUNCTIONAL ASSESSMENTS:

Tinetti Date _____ **Tinetti Results** _____

TSA Date _____ **TSA Results** _____

If the answer to **ANY** Skills Set question is **NEVER**, the applicant is **UNCONDITIONALLY ELIGIBLE**

If the answers to **ALL** the Skills Set questions are **ALWAYS**, the applicant is **NOT ELIGIBLE**

If the answer to Skills Set 1 and 2 is **ALWAYS, and** the answer to Skill Set 3 is **SOMETIMES**, the applicant is **CONDITIONALLY ELIGIBLE**

By _____ HandiVan ID _____

CONDITIONAL ELIGIBILITY DESCRIPTIONS

Based on a reasonable level of effort and risk considering the most limiting condition for the specific trip the individual has requested: (CHOOSE ONLY FROM DROP DOWN SELECTIONS. DO NOT CREATE CONDITIONS ON YOUR OWN. TRAPEZE CANNOT ACCEPT THEM AT THIS TIME.

Condition	Description	Display

WILL APPEAR ON DETERMINATION LETTER:

NOT ELIGIBLE, CONDITIONAL or TEMPORARY

If eligibility is denied, state clearly and in detail below the reasons for the denial to ensure there is a clear basis should the applicant wish to make an appeal. Include enough information to allow applicants to fully prepare for an appeal. (General statements such as, "The process found that you are not eligible to use the ADA paratransit system" are insufficient.

Go to Letter

Office Use Only

InvoiceDate

Oversize ○ Weight ○ Length ○ Width

The Handi-Van Application

[redacted] Date [redacted] Intv ID [redacted]

Please carefully review your answers below and request the Mobility Coordinator to make any changes or additions. Then sign the Signature Page. The original will be returned to you at the end of the in-person assessment.

Nickname _____ DOB [redacted] Gender [redacted] TheHandi-Van ID [redacted]

Phone 1 [redacted] Cell email none

Phone 2 [redacted] Home

Phone 3 _____ _____

Street [redacted] HONOLULU HI [redacted]

Neighborhood [redacted]

Mailing [redacted] Honolulu HI [redacted]

Accessible Formats
- ☒ NONE
- ☐ CD
- ☐ Braille
- ☐ Large Print
- ☐ Audio Tape
- ☐ Interpreter

Disability
- ☒ Arthritis
- ☐ CP
- ☐ Heart/Oxygen
- ☒ Physical/Other
- ☐ Blind
- ☒ Diabetes
- ☐ Low Vision
- ☐ Psychiatric
- ☐ Cognitive
- ☐ Dialysis
- ☐ MS
- ☐ Quad
- ☐ COPD
- ☐ Hearing
- ☐ Para
- ☐ Seizures

Mobility Aids
- ☒ Cane
- ☐ Leg Brace
- ☐ Prothesis
- ☒ Walker; Walker/Seat
- ☐ Car Seat
- ☐ Lift Required
- ☐ PWC
- ☐ Comm Bd
- ☐ MWC
- ☐ Scooter
- ☐ Crutches
- ☐ Port Oxygen
- ☐ Svc Animal

Emergency Contact

[redacted]	[redacted]	[redacted]	[redacted]	Cell

The Handi-Van Application

[redacted] Date [redacted] Intv ID [redacted]

1. Please indicate how your disability or health conditions prevent you from using TheBus fixed route service and indicate which health condition limits your travel the most.
   I have severe arthritis and some days I can't walk because of the pain in my knees and feet. It is hard for me to get to a bus stop. I can't carry my groceries. I am diabetic and I have to watch my blood suger closely. Sometimes I use a cane or on a really bad day, I use the walker my kids gave me.

2. What is the diagnosis and the date of onset of your most limiting disability or health condition?
   Arthritis diagnosed in the 1990s. Diabetes diagnosed in 2005. My doctor says I am not going to get any better.

3. What is the prognosis? Please explain if your most limiting condition is stable, declining or expected to improve:
   Stable now, but I'm going to decline. I'm getting older

4. If this is a temporary condition, when do you expect to recover?
   Not temporary

5. Please explain whether the effects of any of your health conditions cause you to have good/bad days:
   Yes, I have good and bad days, depending on the pain in my legs and feet.

6. Please describe the type of treatment you are receiving, if any:
   I take pain medicine. I try to walk. that's about it.

7. What medications are you currently taking?
   Aspirin, metformin, something for arthritis but I can't remember the name

8. Have you taken any medications today?
   I took all my meds this morning

The Handi-Van Application

[redacted] Date [redacted] Intv ID [redacted]

9. If your medications cause side effects, please describe your they affect your ability to travel:
No side effects

10. On a scale of one to ten, how are you feeling today?
I am about a 7. I have some pain but it's OK right now.

11. If you have seizures, how frequent are they, when what the last one, and how severe are they?
N/A

12. If you have seizures, can you tell if one is about to happen?
N/A

13. If you have seizures, are they controlled by medication?
N/A

14. If applicable, please explain how your health condition and your ability to travel by yourself are affected by humidity, hot or cold weather, air pollution, haze and/or vog:
When it's cold and damp, my arthritis is worse.

15. If applicable, please describe your ability to maintain your balance in crowds, and your ability to grip handrails and small items:
I can stay balanced unless my knees really hurt and the bus driver takes off before I get to a seat. I can hold onto things.

16. If you are legally blind or have low vision, please explain how dim light, shade, darkness or bright sunlight affect your ability to travel outdoors by yourself:
N/A

17. If you have psychiatric condition, please explain how it affects your ability to travel by yourself:
N/A

The Handi-Van Application

[redacted] Date [redacted] Intv ID [redacted]

18. If you have a hearing loss or are deaf, please explain how it affects your ability to travel by yourself:
My hearing is fine right now.

19. If you have multiple sclerosis, please explain how it affects your ability to travel by yourself:
N/A

20. Where is the closest TheBus stop to your home?
There is a bus stop about 1/2 block from my apartment.

21. Please describe any obstruction or barriers between your home and the closest TheBus stop that affect your ability to travel by yourself:
There is a little hill that I would have to walk up to get back from the bus stop. It is downhill going to the bus stop.

22. If applicable, please explain why you quit riding TheBus and how long ago that was:
I still ride TheBus sometimes now. Depends on if I have groceries to carry or if my legs hurt.

23. If you rode TheBus in the past, please describe whether you were able to transfer from one bus to another by yourself to get to your destinations
I transfer sometimes. I don't like to wait too long though for the other bus.

24. If you were ever lost or disoriented while traveling alone, how did you find your way home and how long ago did this happen?
I've never been lost.

25. Please explain the main way you travel now and whether you travel by yourself:
Sometimes I take TheBus or my daughter drives me or I ride with friends. I don't drive anymore.

26. Please describe your ability to travel by yourself to less familiar or totally unfamiliar destinations:
I would be afraid to go someplace alone if I didn't know where I was going

[redacted] Date [redacted] Intv ID [redacted]

27. Please explain why you feel TheHandi-Van will be better for you than riding TheBus:
It will come to my house so I don't have to walk very far and I can bring my bags of groceries with me. I won't have to wait for the bus to come.

28. If you have had Travel Training to ride TheBus, please describe what routes you learned and whether you still ride on these routes:
N/A

29. If you are interested in learning to ride TheBus to new places, where would you like to go? (Travel Training is free and fun!)
I know how to ride TheBus. I don't need any help.

30. Are you able to cross busy streets by yourself all of the time, some of the time, or never? Please explain your answer:
Usually I can cross streets but sometimes I get scared that I won't get across fast enough before the light changes. Especially if my knees are hurting.

31. Are you able to maneuver your wheelchair or step up or down a curb by yourself all of the time, some of the time, or never? Please explain your answer:
I can go up and down from curbs if my knees don't hurt me too much. I just go slow.

32. Are you able to maneuver your wheelchair or walk a short distance on uneven surfaces such as gravel, dirt, or grass by yourself all of the time, some of the time, or never? Please explain your answer:
I walk slow if it's not a good sidewalk. I do not want to fall.

33. While traveling by yourself in good weather, how many blocks on level ground do you think you can walk or maneuver your wheelchair?
I can walk 2 or 3 blocks if my legs are OK. On bad days it hurts to walk at all.

34. Please describe your ability to tell time, to see and read signs by yourself:
I can tell time and read signs.

[redacted] Date [redacted] Intv ID [redacted]

35. Please describe your ability to use a telephone to get information by yourself
I can use a phone.

36. Please describe your ability to wait in good weather by yourself for ten minutes at a bus stop that has no bench or shelter:
If my knees are not bad, I guess I could stand for 10 minutes. I walk around the grocery story and that takes me longer.

37. After being shown how, would you be able to find your way to a bus stop by yourself all of the time, some of the time, or never? Please explain your answer:
I could find my way to a bus stop by myself

38. Are you able to travel up and down a gradual hill by yourself all of the time, some of the time, or never? Please explain your answer:
As I've told you before, if my knees hurt me, I can't walk at all. So going up and down a hill could be bad. But somedays, it would be OK.

39. If you use a mobility device such as a scooter or a walker, how long ago did you begin using it?
N/A

40. If you use a manual wheelchair, do you push yourself using only your hands and arms, or do you also use one or both of your feet?
N/A

41. Please add anything else you would like that would help us understand how your health condition affects your ability to get to or from a bus stop, to board, ride or get off a bus or to understand how to ride TheBus throughout the service area:
I just don't feel good sometimes because of the pain. My doctor told me to ride TheHandi-Van because I am disabled. I need help with my groceries and my friends ride all the time. I still would use TheBus sometimes if I am OK.

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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KIRK W. CALDWELL
ACTING MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU, P.E.
DEPUTY DIRECTOR

RECEIVED
OCT - 5 2010
TranSystems

September 29, 2010

Mr. Russell Thatcher
TranSystems Corp.
38 Chauncy Street, Suite 200
Boston, Massachusetts 02111

Dear Mr. Thatcher:

Subject: City and County of Honolulu's Preliminary Responses to FTA 2010 Americans with Disabilities Act (ADA) Compliance Review

This is to provide you with an interim update on actions taken by the City and County of Honolulu to address the preliminary findings and suggestions that you and the other members of the FTA's ADA Compliance Review Team shared with us during the exit interview conducted on January 28, 2010. Capsule summaries of the Review Team's preliminary findings covered during the exit interview, and the status of our responses to them are summarized in the attached table.

We appreciate your efforts to assist the City and County of Honolulu in maintaining ADA compliance in its ADA complementary paratransit service, TheHandi-Van.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Attachment

PRELIMINARY RESPONSES TO OBSERVATIONS MADE
BY FTA ADA COMPLIANCE REVIEW TEAM
DURING 01/28/2010 EXIT INTERVIEW

Category	FTA Review Team's Observations	Status of the City's Responses
1. **Customer Comments (from Review Team's meeting with Citizens for a Fair ADA Ride)**	a. Confusion over fixed route fare policy	Resolved. Bus passes for paratransit-eligible riders available as of 9/29/ 2009. Forfeited TheHandi-Van ID cards returned to owners by contractor.
	b. Concerns w/ new eligibility process: 1. Objections to persons w/lifelong disabilities having to be assessed again 2. Concern that riders are being pushed onto TheBus 3. Concerns may not be based on personal experience	Riders' concerns about change to in-person eligibility process addressed through public information & outreach; personal concerns can be addressed by mobility coordinators during interview process.
	c. Drivers have multiple pickups at same time	Scheduling issue - covered in Item 9.
	d. Inconsistent assistance beyond curb	Related to need to clarify "origin-to-destination" service for staff and riders – covered in Item 2e.
	e. Problems w/ "Where's My Ride?" phone line access	Phone system issue – covered in Item 5.
	f. Vehicles old, ride rough, interiors dirty	Resource issue – covered in Item 8
	g. Riders experience long travel times (≥2 hrs), lots of back-tracking.	Resource issue – covered in Items 7& 9
	h. Need announcements for riders w/vision disabilities	Related to need to clarify "origin-to-destination" service for staff and riders – covered in Item 2e.
	i. Poor on-time performance 1. Late pick-ups 2. Drop-offs late 50-60% of the time	On-time performance issues covered in Item 7.
	j. Taxi issues: 1. Drivers' limited English proficiency	Related to need to clarify "origin-to-destination" service requirements for staff and drivers of taxi sub-contractors – covered in Item 2e.
	2. No-shows incorrectly recorded (Drivers not always informed when trips are cancelled)	Related to no-show policy - covered in Item 4.

Category	FTA Review Team's Observations	Status of the City's Responses
	3. Riders w/vision disabilities don't know to expect taxi instead of HV	Related to need to clarify "origin-to-destination" service requirements for staff and drivers of taxi sub-contractors – covered in Item 2e.
2. Non-capacity Constraint Issues	a. Service area covers entire island b. Fares meet regulations (≤ 2X fixed route fares)	**No action required - system exceeds ADA requirements for these standards.**
	c. Riders Guide incorrectly states HV hours of operation o Rtes 88A, 42, 412 have 1st pickups earlier than 5 am	**Partially resolved.** Web sites corrected. Work in progress to correct hours of operation in Riders' Guide and other printed public information materials. Expected public distribution during first quarter 2011. *(Exhibit A: Print copy of TheHandi-Van web page)*
	d. No trip priority policies for reservations meets regulations	**No action required – system is ADA-compliant for this standard.**
	e. Public information materials state "curb-to-curb" service; current FTA guidance emphasizes "origin-to-destination" service	**Work in progress.** Text clarifying "origin-to-destination" services in Riders' Guide and other public information materials in process. Expected public distribution during first quarter 2011.
	1. Confusion about availability of assistance for riders (Many HV operators provide help, taxis do not)	**Resolved.** Contractor completed refresher training on ADA service standards.
	f. Site investigations well-documented 1. 2 private properties prohibit TheHandi-Van access	**Resolved.** Site investigation reports were reviewed. It was determined that sites that cannot accommodate large cutaway vans had been incorrectly described as prohibiting access to TheHandi-Van vehicles. Reports have been corrected to state "site inaccessible due to van requirements".
3. Eligibility Process	a. Comparisons of outcomes: 1. Previous paper process: – 14,000 registered riders – 60% conditionally eligible; 39% unconditional; 1% temporary eligibility Review Team noted that 60% conditionally eligible is a relatively high proportion 2. New in-person assessment process:	

Category	FTA Review Team's Observations	Status of the City's Responses
	– 33% conditionally eligible; 63% unconditional; 2% temporary eligibility; 2% ineligible – Appointment requests ≈350/month; total 720 interviews actually conducted (as of 3rd week of January 2010). Review Team noted that 33% conditionally eligible is more in keeping with national trends Estimated 30% reduction in demand ∘ Run basic skills test, even if applicant attests to their functional capabilities. –	**Resolved.** Functional tests are being administered as suggested by the Review Team.
	∘ Consider hiring or contracting licensed physical therapist (PT) or occupational therapist (OT) for Eligibility Center staff: – Enhances in-house assessment capabilities – Suggestion that PT or OT conduct all outdoor functional assessments	**Under long-range consideration.** OT administrator reviewed Eligibility Center process and confirmed that appropriate tests are being administered correctly by contractor's mobility coordinators. Attempts to develop working relationships with local OT professional organizations & resources unsuccessful to date.
	b. Examination of 22 applicant files: 1. All completed w/in 21 days (using interview date as date of application) 2. Outcome: 7 denials and 15 conditional eligibility, of which 10 records extremely complete, 4 pretty good, 1 not so good (identified "post-dialysis" instead of "extreme fatigue" as a condition) ∘ Recommended improvements to applicant files: – Identify all conditions affecting an applicant's eligibility – State affected functional ability and not diagnosis when identifying eligibility conditions (Ex: "Extreme fatigue" instead of "post-dialysis") – Document processing timeframes (Ex: Intervals between date call	**Resolved.** All of the Review Team's suggestions were adopted by contractor.

Category	FTA Review Team's Observations	Status of the City's Responses
	requesting interview was received and date interview conducted; negotiated interview date)	
4. No-show Suspension Policy	Official policy calls for service suspension if 3 no-shows occur in 90-day period. Confirmed that policy has not been enforced for ≈3 yrs. ∘ If reinstated, evaluate pattern of no-shows first – Don't set arbitrary number of no-shows as basis for suspending service. – Frequency of a rider's use should be factored into decision	Work in progress. Revised no-show policy drafted by contractor & under review by City. Riders to be subject to written warnings and subsequent sanctions based on occurrence of no-shows as a proportion of total ride reservations over a consecutive 3-month period. Consultation with community groups (including riders & disability advocates) to be completed before implementation of policy.
5. Phone System Performance	a. Access to phone system can be an ADA issue if riders are kept from asking for ride reservations.	
	b. Telephone Hold Times 1. Reservations line: average hold times >2 minutes during 8-9 am and 2-5 pm 2. Where's My Ride line: hold times much greater than 2 minutes (5:34 wait) during 8-11:30 am period; calls not answered (cut after 4:27 wait) ∘ Take phone off hook when away from desk ∘ Compile Trapeze reports on maximum telephone hold times by hour- Send hourly report to DTS ∘ Performance report on Late Cxl Line ∘ Run before and after report/stats. (prior to hiring additional reservationists).	Resolved. "Quick fix" suggestions (i.e., taking phone off hook, hold time reports) implemented. 2 additional staff hired to cover areas that are deficient, based on daily reports generated by the phone system; tentatively scheduled to start work on 10/11/2010.
6. Reservations	a. Observed 188 bookings 1. No wait list 2. No outright denials 3. 185 reservations booked as requested 4. 3 negotiated times resulted in reservations >1 hour from requested	

Category	FTA Review Team's Observations	Status of the City's Responses
	time (due to "matrix" and blocked-out times)	
	b. Review of past 6-months records: 1. 74 reservations >1 hour from requested time 2. 4 outright denials	
	c. "Matrix"/slot management as currently practiced 1. Urban Honolulu: On the hour 2. Outlying/rural areas: Every 2 hours 3. Additional times blocked-out for subscription rides Reviewers note this is an ADA compliance issue if practice leaves insufficient capacity for demand trips. Also, extended time for negotiating reservations could be a concern ∘ Fix matrix.	**Partially resolved.** (1) All weekend scheduling being made in "real time". (2) Reservations for a portion of urban Honolulu are now available every ½ hour. Area to be expanded to cover Kahala Mall to Pearl City (Kaahumanu Street) as of 10/8/10. Possible further expansion to Aina Haina & Hawaii Kai areas to be undertaken as resources are available. (3) Pilot project, "Agency-provided Trips", undertaken through the City's Human Services Transportation Coordination Program and using FTA New Freedom grant funds, started service in May 2010, resulting in reduction of about 4,000 subscription trips per month from TheHandi-Van rolls. *(Exhibit B: Sample of trip sheets/manifests)*
7. On-time Performance	a. Analysis of 152-trip sample of drivers' manifests from 12/9/2009 (every 15th trip) 1. Pick-ups: 86% on time – Substantially below goal of 95% – 30-minute window is routinely exceeded 2. Drop-offs: 25% late to scheduled appointments ∘ Revisit on-time performance goals	Work in progress. To be addressed in Short Range Transit Operations Plan

Category	FTA Review Team's Observations	Status of the City's Responses
	∘ Factor riders' appointment times into on-time standards ∘ Establish interim goals ∘ Eliminate appt. times for all return to home trips.	(work in progress). **Work in progress.** **Partially resolved.** To be addressed in Short Range Transit Operations Plan (work in progress). **Resolved.** Practice adopted by contractor *(Exhibit C: Copy of 9/10/2010 Nelson\Nygaard draft memo, "TheHandi-Van: Development of Strategies")*
	b. On-board travel time (adjusted for 11% vehicles w/o MDTs) 1. TheHandi-Van performance – Average trip time: 49 minutes – Trips <30 minutes: 39% – Trips 31-60 minutes: 34% – Trips 61-90 minutes: 18% – Trips 91-120 minutes: 3% – Trips ≥121 minutes: 6% 2. Comparison of sample w/ equivalent fixed route trips: – HV trips shorter than fixed route (FR) trips: 21% – HV trips longer than FR trips: 79% – (HV trips longer than FR trips by ≥20 minutes: 61%) ∘ Rewrite on-board travel time performance standard (FTA recommends fixed route travel time, including walking time to and from bus stop plus 20 minutes)	**Work in progress.** Work in progress on revised trip duration performance standards. Issues are being addressed, in part, in Short Range Transit Operations Plan.
	c. Analysis of no-shows from 12/1-12/9/2009: 393 recorded 1. Only 50% correctly recorded (should have been missed trips)	**Resolved.** In the past, some events were recorded as no shows but should have been recorded as missed trips. Corrective action taken.
	2. Operators left before end of 5-minute window 5% of time	**Resolved.** Ongoing training provided to address/ensure time sync w/Trapeze

Category	FTA Review Team's Observations	Status of the City's Responses
	3. 40% trips missing data	
	d. Contract taxis 1. On-time performance data not available ∘ Increase oversight over taxi contractors; communicate on-time performance standards and goals ∘ Improve communication between drivers and dispatch ∘ Establish requirement for monthly On-Time Performance report from taxi vendors	Work In progress. Contractor working with taxi sub-contractors to establish standards and reporting requirements. Preliminary reports being provided to contractor for review & approval for performance monitoring. *(Exhibit D: Sample of taxi sub-contractor report)*
8. Resources	a. Vehicles & equipment 1. Total fleet: 166 vehicles – 160 available for paratransit use – 6 reserved for Community Access 2. Daily vehicle requirement: 130 vehicles – 110 peak pull-outs – 20 for late am returns – 30 spares – 22-32 vehicles out of service per day – 3 days where >30 vehicles out of service	
	3. Fleet is relatively old – 43% vehicles have been operated >300,000 miles – About ½ fleet 7-8 years old – ≈ 2 breakdowns/day; 4-6 some days	
	4. Cleanliness of vehicles: interiors didn't look too bad – Interior issues primarily related to seat restraints	Resolved. Contractor implemented the following procedures: ∘ Established quality control checks for vehicle cleanliness. Quality Assurance check list in place ∘ Exteriors washed daily; quick clean only ∘ Power steam clean/dry securement belts

Category	FTA Review Team's Observations	Status of the City's Responses
		(Exhibit E: Quality assurance checklist)
	5. MDT reliability issues need to be looked at more closely • Focus on reliable communications	**Resolved.** City/contractor working group has been meeting to monitor and address communications system issues on a monthly basis since January 2010. *(Exhibit F: Summaries of working group meetings)*
	b. Manpower 1. 239 operators, 5% turnover Compares favorably to 30% turnover nationwide 2. 34 "blown" runs in 1 month < 1%	
	c. Budget 1. 2005-2007 ridership: increased by about 10.4% 2. 10.4% ridership increases modest 3. Budget increases have been keeping pace with ridership	
	d. Implementation of real-time scheduling 1. 2 additional reservationists insufficient 2. Expect phone times to double Need to increase system capacity before initiating	**Under long-range consideration.**
9. Reservations, scheduling, dispatch policies	a. Across-the-board good attitudes, professionalism	
	b. Reservationists "just input" ride requests into system, which pushes burden onto scheduling	
	c. Bulk of scheduling done in schedulers' heads, not in Trapeze 1. Able to fit all but 100/1200 trips into runs 2. Schedulers feel they need 10-15 more morning, mid-day & afternoon runs to meet demand Places burden on operators to figure out schedules Dispatch has to rely on operators to ask for help	

_____ By _____		HandiVan ID _____
Determination Date _____	Interview ID _____	Determination ID _____

Elig Type _____ Elig End _____ Extension ○ Yes ○ No

PCA ○ No ○ Yes Space Type _____ Deter Review _____

EXPEDITED ELIGIBILITY? ☐ Yes Explanation _____

DETER COMPLETED _____

Determination Letter Mailed _____

CATEGORY 1 - 49 CFR 37.123.(e) (1): Boarding, Riding, and Disembarking from a Fixed Route Bus

The applicant is able (with driver assistance operating the lift) to ***independently BOARD, RIDE and DISEMBARK*** from fixed route vehicles throughout the service area.

○ Always ○ Never

If marked **NEVER**, check the transit skills the applicant cannot perform due to a qualifying disability. With a reasonable level of effort and risk the applicant cannot independently:

- ☐ Be in crowded situations
- ☐ Remain oriented in noisy buses
- ☐ Climb bus steps
- ☐ Get to seat or securement area
- ☐ Stay balanced on moving bus
- ☐ Stand on moving lift
- ☐ Transfer between routes
- ☐ Act appropriately in public setting
- ☐ Remain stable in crowded buses
- ☐ Grasp handrails/pull signal cord
- ☐ Recognize destination/landmarks
- ☐ Handle fare media
- ☐ Ride in seated position
- ☐ Get onto lift in mobility device
- ☐ Get off where lift can't be deployed
- ☐ Identify correct bus to board

CATEGORY 1 - 49 CFR 37.123.(e) (1): Understanding and Navigating the Fixed Route System

The applicant is able to ***independently UNDERSTAND and NAVIGATE*** the fixed route system throughout the service area.

○ Always ○ Never

If marked **NEVER**, check the transit skills the applicant cannot perform due to a qualifying disability. With a reasonable level of effort and risk the applicant cannot independently:

- ☐ Go to unfamiliar destinations
- ☐ Exercise personal safety skills
- ☐ Seek and act on directions
- ☐ Deal with unexpected situations
- ☐ Remember directions
- ☐ Locate and recognize the right bus
- ☐ Travel safely in the community
- ☐ Orient oneself to person/place/time
- ☐ Stay on task
- ☐ Transfer between routes
- ☐ Get and remember transit system info
- ☐ Signal for stop at right location

_____ By _____ HandiVan ID _____

CATEGORY 3 - 49 CFR 37.123.(e) (3): Getting to and from a bus stop or destination

The applicant is able to ***independently GET TO AND FROM BUS STOPS AND DESTINATIONS*** throughout the service area.

○ Always ○ Never ○ Sometimes

If marked **NEVER or SOMETIMES**, check the transit skills the applicant cannot perform due to a qualifying disability. With a reasonable level of effort and risk the applicant cannot independently:

- ☐ Go four blocks on level ground
- ☐ Go up/down three six inch steps
- ☐ Go up/down long ramps
- ☐ Go around obstacles/barriers
- ☐ Go across steep driveways
- ☐ Locate the curb or curb cuts
- ☐ Locate bus stop
- ☐ Cross two lanes with no signal
- ☐ Control mobility device adequately
- ☐ Go on uneven pavement
- ☐ Go on gravel/dirt/grassy surfaces
- ☐ Wait ten minutes standing
- ☐ Go up/down a gradual hill
- ☐ Go across sloped sidewalks
- ☐ Locate pedestrian signal
- ☐ Cross misaligned intersections
- ☐ Cross four lanes with a signal

CONDITIONAL ELIGIBILITY: Issues with Architectural and Environmental Barriers

If Category 3 is marked **SOMETIMES** , check all the architectural or environmental barriers that interact with the applicant's specific impairment-related condition to prevent him/her from independently getting to and from fixed route bus stops:

- ☐ Hills/steep or long grades
- ☐ Distance to/from stops
- ☐ Rain/Hot/Cold weather
- ☐ Air pollution/haze/vog
- ☐ Excess ambient noise
- ☐ No sidewalks/rough terrain
- ☐ Low or bright light
- ☐ Crowded areas
- ☐ Undetectable objects
- ☐ Flooding
- ☐ High winds
- ☐ Busy streets/intersections
- ☐ Constant right turns on red
- ☐ Steep curbs/steps
- ☐ No curb cuts/poor curb cuts
- ☐ Bus stops without detectable poles
- ☐ No pedestrian signals
- ☐ Wide open parking lots
- ☐ Utility obstacles/construction barricades
- ☐ No detectable path of travel
- ☐ Unaligned intersections
- ☐ Curbs with no detectable warnings

RESULTS OF FUNCTIONAL ASSESSMENTS:

Tinetti Date _____ **Tinetti Results** _____

TSA Date _____ **TSA Results** _____

If the answer to **ANY** Skills Set question is **NEVER**, the applicant is **UNCONDITIONALLY ELIGIBLE**

If the answers to **ALL** the Skills Set questions are **ALWAYS**, the applicant is **NOT ELIGIBLE**

If the answer to Skills Set 1 and 2 is **ALWAYS, and** the answer to Skill Set 3 is **SOMETIMES**, the applicant is **CONDITIONALLY ELIGIBLE**

_____ By _____ HandiVan ID _____

CONDITIONAL ELIGIBILITY DESCRIPTIONS

Based on a reasonable level of effort and risk considering the most limiting condition for the specific trip the individual has requested: (CHOOSE ONLY FROM DROP DOWN SELECTIONS. DO NOT CREATE CONDITIONS ON YOUR OWN. TRAPEZE CANNOT ACCEPT THEM AT THIS TIME.

Condition	Description	Display

WILL APPEAR ON DETERMINATION LETTER:

NOT ELIGIBLE, CONDITIONAL or TEMPORARY

If eligibility is denied, state clearly and in detail below the reasons for the denial to ensure there is a clear basis should the applicant wish to make an appeal. Include enough information to allow applicants to fully prepare for an appeal. (General statements such as, "The process found that you are not eligible to use the ADA paratransit system" are insufficient.

Go to Letter

Office Use Only

InvoiceDate

Oversize ○ Weight ○ Length ○ Width

The Handi-Van Application

[redacted] Date [redacted] Intv ID [redacted]

Please carefully review your answers below and request the Mobility Coordinator to make any changes or additions. Then sign the Signature Page. The original will be returned to you at the end of the in-person assessment.

Nickname _____ DOB [redacted] Gender [redacted] TheHandi-Van ID [redacted]

Phone 1 [redacted] Cell email none

Phone 2 [redacted] Home

Phone 3 _____ _____

Street [redacted] HONOLULU HI [redacted]

Neighborhood [redacted]

Mailing [redacted] Honolulu HI [redacted]

Accessible Formats
- ☒ NONE
- ☐ CD
- ☐ Braille
- ☐ Large Print
- ☐ Audio Tape
- ☐ Interpreter

Disability
- ☒ Arthritis
- ☐ CP
- ☐ Heart/Oxygen
- ☒ Physical/Other
- ☐ Blind
- ☒ Diabetes
- ☐ Low Vision
- ☐ Psychiatric
- ☐ Cognitive
- ☐ Dialysis
- ☐ MS
- ☐ Quad
- ☐ COPD
- ☐ Hearing
- ☐ Para
- ☐ Seizures

Mobility Aids
- ☒ Cane
- ☐ Leg Brace
- ☐ Prothesis
- ☒ Walker; Walker/Seat
- ☐ Car Seat
- ☐ Lift Required
- ☐ PWC
- ☐ Comm Bd
- ☐ MWC
- ☐ Scooter
- ☐ Crutches
- ☐ Port Oxygen
- ☐ Svc Animal

Emergency Contact

[redacted]	[redacted]	[redacted]	[redacted]	Cell

The Handi-Van Application

[redacted] Date [redacted] Intv ID [redacted]

1. Please indicate how your disability or health conditions prevent you from using TheBus fixed route service and indicate which health condition limits your travel the most.
   I have severe arthritis and some days I can't walk because of the pain in my knees and feet. It is hard for me to get to a bus stop. I can't carry my groceries. I am diabetic and I have to watch my blood suger closely. Sometimes I use a cane or on a really bad day, I use the walker my kids gave me.

2. What is the diagnosis and the date of onset of your most limiting disability or health condition?
   Arthritis diagnosed in the 1990s. Diabetes diagnosed in 2005. My doctor says I am not going to get any better.

3. What is the prognosis? Please explain if your most limiting condition is stable, declining or expected to improve:
   Stable now, but I'm going to decline. I'm getting older

4. If this is a temporary condition, when do you expect to recover?
   Not temporary

5. Please explain whether the effects of any of your health conditions cause you to have good/bad days:
   Yes, I have good and bad days, depending on the pain in my legs and feet.

6. Please describe the type of treatment you are receiving, if any:
   I take pain medicine. I try to walk. that's about it.

7. What medications are you currently taking?
   Aspirin, metformin, something for arthritis but I can't remember the name

8. Have you taken any medications today?
   I took all my meds this morning

[redacted] Date [redacted] Intv ID [redacted]

9. If your medications cause side effects, please describe your they affect your ability to travel:
No side effects

10. On a scale of one to ten, how are you feeling today?
I am about a 7. I have some pain but it's OK right now.

11. If you have seizures, how frequent are they, when what the last one, and how severe are they?
N/A

12. If you have seizures, can you tell if one is about to happen?
N/A

13. If you have seizures, are they controlled by medication?
N/A

14. If applicable, please explain how your health condition and your ability to travel by yourself are affected by humidity, hot or cold weather, air pollution, haze and/or vog:
When it's cold and damp, my arthritis is worse.

15. If applicable, please describe your ability to maintain your balance in crowds, and your ability to grip handrails and small items:
I can stay balanced unless my knees really hurt and the bus driver takes off before I get to a seat. I can hold onto things.

16. If you are legally blind or have low vision, please explain how dim light, shade, darkness or bright sunlight affect your ability to travel outdoors by yourself:
N/A

17. If you have psychiatric condition, please explain how it affects your ability to travel by yourself:
N/A

The Handi-Van Application

[redacted] Date [redacted] Intv ID [redacted]

18. If you have a hearing loss or are deaf, please explain how it affects your ability to travel by yourself:
My hearing is fine right now.

19. If you have multiple sclerosis, please explain how it affects your ability to travel by yourself:
N/A

20. Where is the closest TheBus stop to your home?
There is a bus stop about 1/2 block from my apartment.

21. Please describe any obstruction or barriers between your home and the closest TheBus stop that affect your ability to travel by yourself:
There is a little hill that I would have to walk up to get back from the bus stop. It is downhill going to the bus stop.

22. If applicable, please explain why you quit riding TheBus and how long ago that was:
I still ride TheBus sometimes now. Depends on if I have groceries to carry or if my legs hurt.

23. If you rode TheBus in the past, please describe whether you were able to transfer from one bus to another by yourself to get to your destinations
I transfer sometimes. I don't like to wait too long though for the other bus.

24. If you were ever lost or disoriented while traveling alone, how did you find your way home and how long ago did this happen?
I've never been lost.

25. Please explain the main way you travel now and whether you travel by yourself:
Sometimes I take TheBus or my daughter drives me or I ride with friends. I don't drive anymore.

26. Please describe your ability to travel by yourself to less familiar or totally unfamiliar destinations:
I would be afraid to go someplace alone if I didn't know where I was going

[redacted] Date [redacted] Intv ID [redacted]

27. Please explain why you feel TheHandi-Van will be better for you than riding TheBus:
It will come to my house so I don't have to walk very far and I can bring my bags of groceries with me. I won't have to wait for the bus to come.

28. If you have had Travel Training to ride TheBus, please describe what routes you learned and whether you still ride on these routes:
N/A

29. If you are interested in learning to ride TheBus to new places, where would you like to go? (Travel Training is free and fun!)
I know how to ride TheBus. I don't need any help.

30. Are you able to cross busy streets by yourself all of the time, some of the time, or never? Please explain your answer:
Usually I can cross streets but sometimes I get scared that I won't get across fast enough before the light changes. Especially if my knees are hurting.

31. Are you able to maneuver your wheelchair or step up or down a curb by yourself all of the time, some of the time, or never? Please explain your answer:
I can go up and down from curbs if my knees don't hurt me too much. I just go slow.

32. Are you able to maneuver your wheelchair or walk a short distance on uneven surfaces such as gravel, dirt, or grass by yourself all of the time, some of the time, or never? Please explain your answer:
I walk slow if it's not a good sidewalk. I do not want to fall.

33. While traveling by yourself in good weather, how many blocks on level ground do you think you can walk or maneuver your wheelchair?
I can walk 2 or 3 blocks if my legs are OK. On bad days it hurts to walk at all.

34. Please describe your ability to tell time, to see and read signs by yourself:
I can tell time and read signs.

[redacted] Date [redacted] Intv ID [redacted]

35. Please describe your ability to use a telephone to get information by yourself
I can use a phone.

36. Please describe your ability to wait in good weather by yourself for ten minutes at a bus stop that has no bench or shelter:
If my knees are not bad, I guess I could stand for 10 minutes. I walk around the grocery story and that takes me longer.

37. After being shown how, would you be able to find your way to a bus stop by yourself all of the time, some of the time, or never? Please explain your answer:
I could find my way to a bus stop by myself

38. Are you able to travel up and down a gradual hill by yourself all of the time, some of the time, or never? Please explain your answer:
As I've told you before, if my knees hurt me, I can't walk at all. So going up and down a hill could be bad. But somedays, it would be OK.

39. If you use a mobility device such as a scooter or a walker, how long ago did you begin using it?
N/A

40. If you use a manual wheelchair, do you push yourself using only your hands and arms, or do you also use one or both of your feet?
N/A

41. Please add anything else you would like that would help us understand how your health condition affects your ability to get to or from a bus stop, to board, ride or get off a bus or to understand how to ride TheBus throughout the service area:
I just don't feel good sometimes because of the pain. My doctor told me to ride TheHandi-Van because I am disabled. I need help with my groceries and my friends ride all the time. I still would use TheBus sometimes if I am OK.

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

KIRK W. CALDWELL
ACTING MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU, P.E.
DEPUTY DIRECTOR

RECEIVED
OCT - 5 2010
TranSystems

September 29, 2010

Mr. Russell Thatcher
TranSystems Corp.
38 Chauncy Street, Suite 200
Boston, Massachusetts 02111

Dear Mr. Thatcher:

Subject: City and County of Honolulu's Preliminary Responses to FTA 2010 Americans with Disabilities Act (ADA) Compliance Review

This is to provide you with an interim update on actions taken by the City and County of Honolulu to address the preliminary findings and suggestions that you and the other members of the FTA's ADA Compliance Review Team shared with us during the exit interview conducted on January 28, 2010. Capsule summaries of the Review Team's preliminary findings covered during the exit interview, and the status of our responses to them are summarized in the attached table.

We appreciate your efforts to assist the City and County of Honolulu in maintaining ADA compliance in its ADA complementary paratransit service, TheHandi-Van.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Attachment

PRELIMINARY RESPONSES TO OBSERVATIONS MADE
BY FTA ADA COMPLIANCE REVIEW TEAM
DURING 01/28/2010 EXIT INTERVIEW

Category	FTA Review Team's Observations	Status of the City's Responses
1. **Customer Comments (from Review Team's meeting with Citizens for a Fair ADA Ride)**	a. Confusion over fixed route fare policy	Resolved. Bus passes for paratransit-eligible riders available as of 9/29/ 2009. Forfeited TheHandi-Van ID cards returned to owners by contractor.
	b. Concerns w/ new eligibility process: 1. Objections to persons w/lifelong disabilities having to be assessed again 2. Concern that riders are being pushed onto TheBus 3. Concerns may not be based on personal experience	Riders' concerns about change to in-person eligibility process addressed through public information & outreach; personal concerns can be addressed by mobility coordinators during interview process.
	c. Drivers have multiple pickups at same time	Scheduling issue - covered in Item 9.
	d. Inconsistent assistance beyond curb	Related to need to clarify "origin-to-destination" service for staff and riders – covered in Item 2e.
	e. Problems w/ "Where's My Ride?" phone line access	Phone system issue – covered in Item 5.
	f. Vehicles old, ride rough, interiors dirty	Resource issue – covered in Item 8
	g. Riders experience long travel times (≥2 hrs), lots of back-tracking.	Resource issue – covered in Items 7& 9
	h. Need announcements for riders w/vision disabilities	Related to need to clarify "origin-to-destination" service for staff and riders – covered in Item 2e.
	i. Poor on-time performance 1. Late pick-ups 2. Drop-offs late 50-60% of the time	On-time performance issues covered in Item 7.
	j. Taxi issues: 1. Drivers' limited English proficiency	Related to need to clarify "origin-to-destination" service requirements for staff and drivers of taxi sub-contractors – covered in Item 2e.
	2. No-shows incorrectly recorded (Drivers not always informed when trips are cancelled)	Related to no-show policy - covered in Item 4.

Category	FTA Review Team's Observations	Status of the City's Responses
	3. Riders w/vision disabilities don't know to expect taxi instead of HV	Related to need to clarify "origin-to-destination" service requirements for staff and drivers of taxi sub-contractors – covered in Item 2e.
2. Non-capacity Constraint Issues	a. Service area covers entire island b. Fares meet regulations (≤ 2X fixed route fares)	**No action required - system exceeds ADA requirements for these standards.**
	c. Riders Guide incorrectly states HV hours of operation o Rtes 88A, 42, 412 have 1st pickups earlier than 5 am	**Partially resolved.** Web sites corrected. Work in progress to correct hours of operation in Riders' Guide and other printed public information materials. Expected public distribution during first quarter 2011. *(Exhibit A: Print copy of TheHandi-Van web page)*
	d. No trip priority policies for reservations meets regulations	**No action required – system is ADA-compliant for this standard.**
	e. Public information materials state "curb-to-curb" service; current FTA guidance emphasizes "origin-to-destination" service	**Work in progress.** Text clarifying "origin-to-destination" services in Riders' Guide and other public information materials in process. Expected public distribution during first quarter 2011.
	1. Confusion about availability of assistance for riders (Many HV operators provide help, taxis do not)	**Resolved.** Contractor completed refresher training on ADA service standards.
	f. Site investigations well-documented 1. 2 private properties prohibit TheHandi-Van access	**Resolved.** Site investigation reports were reviewed. It was determined that sites that cannot accommodate large cutaway vans had been incorrectly described as prohibiting access to TheHandi-Van vehicles. Reports have been corrected to state "site inaccessible due to van requirements".
3. Eligibility Process	a. Comparisons of outcomes: 1. Previous paper process: – 14,000 registered riders – 60% conditionally eligible; 39% unconditional; 1% temporary eligibility Review Team noted that 60% conditionally eligible is a relatively high proportion 2. New in-person assessment process:	

Category	FTA Review Team's Observations	Status of the City's Responses
	– 33% conditionally eligible; 63% unconditional; 2% temporary eligibility; 2% ineligible – Appointment requests ≈350/month; total 720 interviews actually conducted (as of 3rd week of January 2010). Review Team noted that 33% conditionally eligible is more in keeping with national trends Estimated 30% reduction in demand o Run basic skills test, even if applicant attests to their functional capabilities. –	**Resolved.** Functional tests are being administered as suggested by the Review Team.
	o Consider hiring or contracting licensed physical therapist (PT) or occupational therapist (OT) for Eligibility Center staff: – Enhances in-house assessment capabilities – Suggestion that PT or OT conduct all outdoor functional assessments	**Under long-range consideration.** OT administrator reviewed Eligibility Center process and confirmed that appropriate tests are being administered correctly by contractor's mobility coordinators. Attempts to develop working relationships with local OT professional organizations & resources unsuccessful to date.
	b. Examination of 22 applicant files: 1. All completed w/in 21 days (using interview date as date of application) 2. Outcome: 7 denials and 15 conditional eligibility, of which 10 records extremely complete, 4 pretty good, 1 not so good (identified "post-dialysis" instead of "extreme fatigue" as a condition) o Recommended improvements to applicant files: – Identify all conditions affecting an applicant's eligibility – State affected functional ability and not diagnosis when identifying eligibility conditions (Ex: "Extreme fatigue" instead of "post-dialysis") – Document processing timeframes (Ex: Intervals between date call	**Resolved.** All of the Review Team's suggestions were adopted by contractor.

Category	FTA Review Team's Observations	Status of the City's Responses
	requesting interview was received and date interview conducted; negotiated interview date)	
4. No-show Suspension Policy	Official policy calls for service suspension if 3 no-shows occur in 90-day period. Confirmed that policy has not been enforced for ≈3 yrs. • If reinstated, evaluate pattern of no-shows first – Don't set arbitrary number of no-shows as basis for suspending service. – Frequency of a rider's use should be factored into decision	Work in progress. Revised no-show policy drafted by contractor & under review by City. Riders to be subject to written warnings and subsequent sanctions based on occurrence of no-shows as a proportion of total ride reservations over a consecutive 3-month period. Consultation with community groups (including riders & disability advocates) to be completed before implementation of policy.
5. Phone System Performance	a. Access to phone system can be an ADA issue if riders are kept from asking for ride reservations.	
	b. Telephone Hold Times 1. Reservations line: average hold times >2 minutes during 8-9 am and 2-5 pm 2. Where's My Ride line: hold times much greater than 2 minutes (5:34 wait) during 8-11:30 am period; calls not answered (cut after 4:27 wait) • Take phone off hook when away from desk • Compile Trapeze reports on maximum telephone hold times by hour- Send hourly report to DTS • Performance report on Late Cxl Line • Run before and after report/stats. (prior to hiring additional reservationists).	Resolved. "Quick fix" suggestions (i.e., taking phone off hook, hold time reports) implemented. 2 additional staff hired to cover areas that are deficient, based on daily reports generated by the phone system; tentatively scheduled to start work on 10/11/2010.
6. Reservations	a. Observed 188 bookings 1. No wait list 2. No outright denials 3. 185 reservations booked as requested 4. 3 negotiated times resulted in reservations >1 hour from requested	

Category	FTA Review Team's Observations	Status of the City's Responses
	time (due to "matrix" and blocked-out times)	
	b. Review of past 6-months records: 1. 74 reservations >1 hour from requested time 2. 4 outright denials	
	c. "Matrix"/slot management as currently practiced 1. Urban Honolulu: On the hour 2. Outlying/rural areas: Every 2 hours 3. Additional times blocked-out for subscription rides Reviewers note this is an ADA compliance issue if practice leaves insufficient capacity for demand trips. Also, extended time for negotiating reservations could be a concern ∘ Fix matrix.	**Partially resolved.** (1) All weekend scheduling being made in "real time". (2) Reservations for a portion of urban Honolulu are now available every ½ hour. Area to be expanded to cover Kahala Mall to Pearl City (Kaahumanu Street) as of 10/8/10. Possible further expansion to Aina Haina & Hawaii Kai areas to be undertaken as resources are available. (3) Pilot project, "Agency-provided Trips", undertaken through the City's Human Services Transportation Coordination Program and using FTA New Freedom grant funds, started service in May 2010, resulting in reduction of about 4,000 subscription trips per month from TheHandi-Van rolls. *(Exhibit B: Sample of trip sheets/manifests)*
7. **On-time Performance**	a. Analysis of 152-trip sample of drivers' manifests from 12/9/2009 (every 15th trip) 1. Pick-ups: 86% on time – Substantially below goal of 95% – 30-minute window is routinely exceeded 2. Drop-offs: 25% late to scheduled appointments ∘ Revisit on-time performance goals	Work in progress. To be addressed in Short Range Transit Operations Plan

Category	FTA Review Team's Observations	Status of the City's Responses
	∘ Factor riders' appointment times into on-time standards ∘ Establish interim goals ∘ Eliminate appt. times for all return to home trips.	(work in progress). **Work in progress.** **Partially resolved.** To be addressed in Short Range Transit Operations Plan (work in progress). **Resolved.** Practice adopted by contractor *(Exhibit C: Copy of 9/10/2010 Nelson\Nygaard draft memo, "TheHandi-Van: Development of Strategies")*
	b. On-board travel time (adjusted for 11% vehicles w/o MDTs) 1. TheHandi-Van performance – Average trip time: 49 minutes – Trips <30 minutes: 39% – Trips 31-60 minutes: 34% – Trips 61-90 minutes: 18% – Trips 91-120 minutes: 3% – Trips ≥121 minutes: 6% 2. Comparison of sample w/ equivalent fixed route trips: – HV trips shorter than fixed route (FR) trips: 21% – HV trips longer than FR trips: 79% – (HV trips longer than FR trips by ≥20 minutes: 61%) ∘ Rewrite on-board travel time performance standard (FTA recommends fixed route travel time, including walking time to and from bus stop plus 20 minutes)	**Work in progress.** Work in progress on revised trip duration performance standards. Issues are being addressed, in part, in Short Range Transit Operations Plan.
	c. Analysis of no-shows from 12/1-12/9/2009: 393 recorded 1. Only 50% correctly recorded (should have been missed trips)	**Resolved.** In the past, some events were recorded as no shows but should have been recorded as missed trips. Corrective action taken.
	2. Operators left before end of 5-minute window 5% of time	**Resolved.** Ongoing training provided to address/ensure time sync w/Trapeze

Category	FTA Review Team's Observations	Status of the City's Responses
	3. 40% trips missing data	
	d. Contract taxis 1. On-time performance data not available ∘ Increase oversight over taxi contractors; communicate on-time performance standards and goals ∘ Improve communication between drivers and dispatch ∘ Establish requirement for monthly On-Time Performance report from taxi vendors	Work in progress. Contractor working with taxi sub-contractors to establish standards and reporting requirements. Preliminary reports being provided to contractor for review & approval for performance monitoring. *(Exhibit D: Sample of taxi sub-contractor report)*
8. Resources	a. Vehicles & equipment 1. Total fleet: 166 vehicles – 160 available for paratransit use – 6 reserved for Community Access 2. Daily vehicle requirement: 130 vehicles – 110 peak pull-outs – 20 for late am returns – 30 spares – 22-32 vehicles out of service per day – 3 days where >30 vehicles out of service	
	3. Fleet is relatively old – 43% vehicles have been operated >300,000 miles – About ½ fleet 7-8 years old – ≈ 2 breakdowns/day; 4-6 some days	
	4. Cleanliness of vehicles: interiors didn't look too bad – Interior issues primarily related to seat restraints	Resolved. Contractor implemented the following procedures: ∘ Established quality control checks for vehicle cleanliness. Quality Assurance check list in place ∘ Exteriors washed daily; quick clean only ∘ Power steam clean/dry securement belts

Category	FTA Review Team's Observations	Status of the City's Responses
		(Exhibit E: Quality assurance checklist)
	5. MDT reliability issues need to be looked at more closely • Focus on reliable communications	Resolved. City/contractor working group has been meeting to monitor and address communications system issues on a monthly basis since January 2010. *(Exhibit F: Summaries of working group meetings)*
	b. Manpower 1. 239 operators, 5% turnover Compares favorably to 30% turnover nationwide 2. 34 "blown" runs in 1 month < 1%	
	c. Budget 1. 2005-2007 ridership: increased by about 10.4% 2. 10.4% ridership increases modest 3. Budget increases have been keeping pace with ridership	
	d. Implementation of real-time scheduling 1. 2 additional reservationists insufficient 2. Expect phone times to double Need to increase system capacity before initiating	Under long-range consideration.
9. Reservations, scheduling, dispatch policies	a. Across-the-board good attitudes, professionalism	
	b. Reservationists "just input" ride requests into system, which pushes burden onto scheduling	
	c. Bulk of scheduling done in schedulers' heads, not in Trapeze 1. Able to fit all but 100/1200 trips into runs 2. Schedulers feel they need 10-15 more morning, mid-day & afternoon runs to meet demand Places burden on operators to figure out schedules Dispatch has to rely on operators to ask for help	

Attachment B
On-Site Review Schedule

ADA Complementary Paratransit Compliance Assessment
City and County of Honolulu Department of Transportation Services (DTS)
January 25-28, 2010

PROPOSED SCHEDULE (1-8-10), PAGE 1

Time	Activity	Who	Where
Monday, January 25, 2010			
9:00 AM	Opening conference	FTA; DTS staff; All assessment team members	650 S. King St.
9:30 AM	Review paratransit service design, policies, standards, service statistics, and other information sent in advance.	All assessment team members; DTS and OTS management staff	650 S. King St.
10:30 AM	Paratransit planning and budgeting; Review recent operating budgets and capital purchases and plans, and approved staffing levels	Russell Thatcher, Bill Schwartz; DTS and OTS budget and management staff	650 S. King St.
10:30 AM	Review DTS customer comment process; Review complaints by type for the past year; Review responses to complaints.	Patti Monahan; DTS customer service staff	650 S. King St.
11:30 AM	Review and compare fixed route and paratransit service area, fares. Review fixed route hours by route and paratransit days and hours.	Russell Thatcher, Bill Schwartz; DTS and OTS staff as needed to explain fixed route policies and comparable paratransit policies	650 S. King St.
12:30 PM	Meeting with Citizens for a Fair ADA Ride	All assessment team members; CFADAR members	841 Bishop St., Davies Pacific Ctr.
3:00 PM	Tour paratransit call center (reservations)	All assessment team members OTS Paratransit Manager and Call Center Manager	811 Middle St.
3:30 PM	Review OTS customer comment process; Review complaints by type for the past year; Review responses to complaints.	Patti Monahan; OTS Customer Service Manager	811 Middle St.
3:30 to 5:00 PM	Observe trip reservations process (using phone splitters if possible)	All assessment team members (Patti Monahan from 4:30-5); OTS reservationists	811 Middle St.
Tuesday, January 26, 2010			
8:00 AM	Observe reservations process (using phone splitters if possible)	All assessment team members	811 Middle St.
10:30 AM	Observe scheduling and interview schedulers. Meet with Lead Scheduler; Discuss scheduling procedures, run structure; system parameters. Generate special reports as needed on no-shows, on-time arrivals.	Russell Thatcher, Bill Schwartz OTS Lead Scheduler and IT/Data Specialist as needed.	811 Middle St.
10:30 AM	Generate special reports as needed on long trips, travel times. Identify sample of long trips. Begin analysis of paratransit versus fixed route travel times	Patti Monahan; OTS schedulers and IT Data Specialist as needed.	811 Middle St.
11:30 AM	Begin review of on-time performance, no-shows and missed trips	Bill Schwartz; OTS IT/Data Specialist as needed.	811 Middle St.
11:30 AM	Analyze trip denials and reservation observations. Generate special denial reports as needed	Russell Thatcher; OTS IT/Data Specialist as needed	811 Middle St.
11 AM - 1 PM	Interview drivers. Inspect vehicles at shift change.	All assessment team members	811 Middle St.
1-2:00 PM	Review phone system design; Review phone performance (ACD) reports; Review call center staffing levels, training, and turnover.	Russell Thatcher, Patti Monahan; OTS Call Center manager	

ADA Complementary Paratransit Compliance Assessment
City and County of Honolulu Department of Transportation Services (DTS)
January 25-28, 2010

PROPOSED SCHEDULE (1-8-10), PAGE 2

Time	Activity	Who	Where
2-5:00 PM	Observe "Where's My Ride? (WMR)" calls and dispatch process (using phone splitters if possible); interview dispatchers	All assessment team members; OTS dispatchers and WMR call-takers	811 Middle St.
Wednesday, January 27, 2010			
8:00 AM	Review driver workforce, driver training, driver turnover. Examine run pull-out records. Examine daily fleet availability records.	All assessment team members; OTS Paratransit Manager, Pull-out Supervisor, Maintenance Manager	811 Middle St.
10:00 AM	Continue on-time performance analysis; No-show analysis. Examine taxi and CAN Senior Transport records. Visit subcontractor as needed.	Bill Schwartz; OTS IT Data Specialist as needed	811 Middle St.
10:00 AM	Continue travel time analysis (with fixed route customer service staff as needed)	Patti Monahan; OTS fixed route trip planning staff as needed.	811 Middle St.
10:00 AM	Review eligibility determination process and records; review no-show and service suspension records; review of 30 recent determinations	Russell Thatcher; DTS Eligibility Coordinator	1100 Ward Ave., Suite 835
11 AM - 3 PM	Interview drivers. Inspect vehicles at shift change.	Patti Monahan, Bill Schwartz	811 Middle St.
3-5:00 PM	Additional telephone hold time and staffing analysis as needed	Patti Monahan; OTS Call Center Manager	811 Middle St.
3-5:00 PM	Additional "Where's My Ride?" and dispatch Observations; Additional Special Reports and analysis as needed	Russell Thatcher, Bill Schwartz; OTS dispatchers, WMR agents, and IT Manager as needed	811 Middle St.
Thursday, January 228, 2010			
8:00 AM	Additional analysis as needed; Tabulate and analyze data	All assessment team members; Various DTS and OTS staff as needed.	811 Middle St.
2:00 PM	Exit Conference	FTA, DTS and OTS staff, All assessment team members	650 S. King St.

Attachment C
Sample Letter Sent to Applicants Found Not Eligible and "Notice of Appeal" Form

Department of Transportation Services
CITY AND COUNTY OF HONOLULU

TheHandi-Van Eligibility Center

First Insurance Center – Suite 835 • 1100 Ward Ave., Honolulu, HI 96814
808-538-0033 • 808-538-0055 Fax

Catch the Right Bus!

- *TheBus*
- *TheHandi-Van*
- *Travel Training*

11/16/2009 [redacted]

[redacted]

[redacted]

We have completed the review of your recent request for ADA paratransit (TheHandi-Van) eligibility. It has been determined that you are **Not Eligible** for ADA paratransit service. This determination is based on the following factor(s):

[redacted] is able to walk 2 miles. [redacted] bus stop is 1/2 block from [redacted] home. During the interview, [redacted] [redacted] can board TheBus and uses TheBus when it is convenient for [redacted] [redacted] physician, has confirmed that [redacted] [redacted] is capable of riding public transportation.

Federal law restricts eligibility for ADA paratransit service to persons who cannot, due to a disability, utilize regular fixed route bus service (TheBus). This determination applies only to your eligibility for ADA paratransit (TheHandi-Van) service offered by the City and County of Honolulu.

We encourage you to use the fixed route bus service and hope you become a regular customer. You can call our Customer Service Office at 848-4500 (voice/TTY) for assistance in planning trip. We have enclosed a copy of a Person with Disability Bus Pass Application for your use.

If you do not agree with this eligibility decision, you have the right to appeal this determination. Any appeal must be made in writing within 60 days from the date of this letter. Information on the appeals process is included with this letter.

If there are changes in your condition that would affect your ability to use the City's fixed route bus service, TheBus, please contact us at 538-0033 to schedule an in-person interview.

Sincerely,

TheHandi-Van Eligibility Center Staff

Enclosures:
- Appeal Policy
- Appeal Request Form
- Person with a Disability Bus Pass Application

Alternate format upon request

Department of Transportation Services
CITY AND COUNTY OF HONOLULU

TheHandi-Van Eligibility Center

First Insurance Center – Suite 835 • 1100 Ward Ave., Honolulu, HI 96814
808-538-0033 • 808-538-0055 Fax

Catch the Right Bus!

- *TheBus*
- *TheHandi-Van*
- *Travel Training*

NOTICE OF APPEAL
(ADA Paratransit Eligibility)

Notice is hereby given that I, _____, wish to appeal the decision that denies me the following for which I believe qualify:
(check one)

____ **ADA Paratransit eligibility:**
Eligibility to use TheHandiVan service

____ **Unconditional ADA Paratransit eligibility:**
Conditional eligibility was given

Therefore, I request that a hearing date be set by the Department of Transportation Services, within twenty (20) working days of receiving this Notice, and that I be notified of the time and the place of the hearing.

_____ _____
Signature Date

Print legibly or type:

NAME: _____

Address: _____

_____

Phone: _____

Notice of Appeal must be submitted within 60 days of notification of denied eligibility
Return this completed form to:

Department of Transportation Services
Paratransit Operations Branch
650 S. King St. – 3rd Floor
Honolulu, HI 96813

Attachment D
Selected Telephone Performance Reports

- **Reservation Call Group Reports for November and December 2009**
- **Hourly Hold Times for November 13, 2009**
- **WMR? Call Group Reports ("HV Cancellation Group") for December 6-12, 2009**

Split/Skill Call Profile Monthly - Reservation Printed: 1/20/2010 05:38:03 PM

Month Starting: 11/1/2009
Split/Skill: Reservation
% Within Service Level: 33.28

Service Intervals Changed: n
Acceptable Service Changed: n

Seconds	0 -	60 -	120 -	180 -	240 -	300 -	360 -	420 -	480 -	540 -	>
ACD Calls:	10944	3893	2768	1772	1100	648	429	127	39		79
Aban Calls:	658	379	213	102	64	32	17	7	6		7

ACD Calls:	21799	Aban Calls:	1485
Avg Speed Ans:	1:35	Avg Aban Time:	1:37
% Ans Calls:	93.62	% Aban Calls:	6.38

14,837 of 21,799 (68%) ≤ 2 min.

17,605 of 21,799 (81%) ≤ 3 min

79 (0.4%) > 10 min

ACD: ACD1

Date: **11/13/2009**

Split/Skill: **Reservation**

Time	Avg Speed Ans	Avg Aban Time	ACD Calls	Avg ACD Time	Avg ACW Time	Aban Calls	Max Delay	Flow In	Flow Out	Extn Out Calls	Avg Extn Out Time	Dequeued Calls	Avg Time to Dequeue	% ACD Time	% Ans Calls	Avg Pos Staff	Calls Per Pos
Totals	**1:50**	**1:38**	**710**	**2:31**	**:38**	**74**	**8:32**	**0**	**0**	**133**	**:19**	**0**		**89.80**	**90.56**	**4.5**	**157**
8:00- 8:30AM	2:44	1:14	57	2:07	:15	18	4:45	0	0	7	:01	0		97.15	76.00	5.0	11
8:30- 9:00AM	1:17	:27	50	2:04	:05	3	4:48	0	0	13	:03	0		92.39	94.34	5.0	10
9:00- 9:30AM	2:33	:41	44	2:51	1:03	5	6:35	0	0	7	:28	0		96.21	89.80	5.0	9
9:30- 10:00AM	:20		35	2:34	:08	0	1:25	0	0	11	:38	0		90.81	100.00	5.0	7
10:00- 10:30AM	:30	1:19	35	2:10	1:51	3	2:03	0	0	6	:04	0		80.14	92.11	5.0	7
10:30- 11:00AM	:35		30	2:32	:08	0	2:29	0	0	14	:59	0		81.38	100.00	5.0	6
11:00- 11:30AM	:31	:54	34	2:21	2:42	2	2:47	0	0	6	:01	0		80.52	94.44	5.0	7
11:30- 12:00PM	:05	:15	25	2:19	1:02	1	1:32	0	0	6	:18	0		73.48	96.15	5.0	5
12:00- 12:30PM	:54		35	2:35	1:09	0	4:03	0	0	9	:11	0		81.17	100.00	5.0	7
12:30- 1:00PM	:33	:30	34	2:07	:39	1	2:10	0	0	3	:09	0		79.57	97.14	5.0	7
1:00- 1:30PM	1:20	:10	25	2:55	:58	1	3:55	0	0	6	:12	0		98.50	96.15	2.8	9
1:30- 2:00PM	:54	:07	16	2:35	1:47	2	1:48	0	0	3	1:30	0		97.47	88.89	1.5	11
2:00- 2:30PM	3:22	1:15	46	2:49	:30	7	6:03	0	0	4	:10	0		96.90	86.79	5.0	9
2:30- 3:00PM	2:34	2:03	44	3:00	:15	7	5:05	0	0	3	:01	0		97.42	86.27	5.0	9
3:00- 3:30PM	1:24	1:39	45	2:15	:28	2	4:49	0	0	7	:29	0		93.46	95.74	5.0	9
3:30- 4:00PM	2:19	1:30	45	3:09	:12	2	4:52	0	0	8	:22	0		97.68	95.74	5.0	9
4:00- 4:30PM	2:17	3:00	44	2:40	:17	8	6:13	0	0	6	:09	0		95.59	84.62	5.0	9
4:30- 5:00PM	4:21	2:46	59	2:26	:03	12	8:32	0	0	12	:01	0		99.22	83.10	5.0	12
5:00- 5:30PM	1:06		7	2:37	:01	0	3:42	0	0	2	:01	0		77.50	100.00	1.4	5

staff available

Date: **12/6/2009**
Split/Skill: **HV Cancellation Grp**
% Within Service Level: **15.46**

Service Intervals Changed: **n**
Acceptable Service Changed: **n**

Seconds	0 - 60	60 - 120	120 - 180	180 - 240	240 - 300	300 - 360	360 - 420	420 - 480	480 - 540	540 - >
ACD Calls:	135	29	8	4	1	2	3	1	0	0
Aban Calls:	26	26	7	6	7	5	3	0	2	2

ACD Calls:	183	Aban Calls:	84
Avg Speed Ans:	:50	Avg Aban Time:	2:25
% Ans Calls:	28.28	% Aban Calls:	12.98

Date: **12/7/2009**
Split/Skill: **HV Cancellation Grp**
% Within Service Level: **5.67**

Service Intervals Changed: **n**
Acceptable Service Changed: **n**

Seconds	0 - 60	60 - 120	120 - 180	180 - 240	240 - 300	300 - 360	360 - 420	420 - 480	480 - 540	540 - >
ACD Calls:	133	83	62	33	35	16	15	15	6	8
Aban Calls:	88	85	50	39	24	15	13	13	5	6

ACD Calls:	406	Aban Calls:	338
Avg Speed Ans:	2:32	Avg Aban Time:	2:42
% Ans Calls:	34.91	% Aban Calls:	29.06

Date: **12/8/2009**
Split/Skill: **HV Cancellation Grp**
% Within Service Level: **9.38**

Service Intervals Changed: **n**
Acceptable Service Changed: **n**

Seconds	0 - 60	60 - 120	120 - 180	180 - 240	240 - 300	300 - 360	360 - 420	420 - 480	480 - 540	540 - >
ACD Calls:	164	82	45	23	15	11	6	9	5	3
Aban Calls:	56	69	36	22	23	10	9	3	4	8

ACD Calls:	363	Aban Calls:	240
Avg Speed Ans:	1:54	Avg Aban Time:	2:42
% Ans Calls:	39.59	% Aban Calls:	26.17

Date: **12/9/2009**
Split/Skill: **HV Cancellation Grp**
% Within Service Level: **13.65**

Service Intervals Changed: **n**
Acceptable Service Changed: **n**

Seconds	0 - 60	60 - 120	120 - 180	180 - 240	240 - 300	300 - 360	360 - 420	420 - 480	480 - 540	540 - >
ACD Calls:	227	80	42	22	22	19	11	4	4	7
Aban Calls:	57	49	37	14	10	7	4	4	2	4

ACD Calls:	438	Aban Calls:	188
Avg Speed Ans:	1:49	Avg Aban Time:	2:19
% Ans Calls:	51.11	% Aban Calls:	21.94

Date: **12/10/2009**
Split/Skill: **HV Cancellation Grp**
% Within Service Level: **7.61**

Service Intervals Changed: n
Acceptable Service Changed: n

Seconds	0 - 60	60 - 120	120 - 180	180 - 240	240 - 300	300 - 360	360 - 420	420 - 480	480 - 540	540 - >
ACD Calls:	164	65	54	29	27	25	23	14	8	21
Aban Calls:	79	62	48	34	25	20	20	11	11	28

ACD Calls:	430	Aban Calls:	338
Avg Speed Ans:	2:51	Avg Aban Time:	3:35
% Ans Calls:	41.43	% Aban Calls:	32.56

Date: **12/11/2009**
Split/Skill: **HV Cancellation Grp**
% Within Service Level: **9.07**

Service Intervals Changed: **n**
Acceptable Service Changed: **n**

Seconds	0 - 60	60 - 120	120 - 180	180 - 240	240 - 300	300 - 360	360 - 420	420 - 480	480 - 540	540 - >
ACD Calls:	177	114	67	26	17	7	5	4	1	17
Aban Calls:	83	65	49	20	15	10	6	4	6	4

ACD Calls:	435	Aban Calls:	262
Avg Speed Ans:	1:58	Avg Aban Time:	2:20
% Ans Calls:	46.42	% Aban Calls:	27.96

Date: **12/12/2009**
Split/Skill: **HV Cancellation Grp**
% Within Service Level: **5.80**

Service Intervals Changed: **n**
Acceptable Service Changed: **n**

Seconds	0 - 60	60 - 120	120 - 180	180 - 240	240 - 300	300 - 360	360 - 420	420 - 480	480 - 540	>
ACD Calls:	61	14	22	16	10	4	6	1	3	0
Aban Calls:	40	41	12	16	6	6	2	3	3	3

ACD Calls:	137	Aban Calls:	132
Avg Speed Ans:	2:05	Avg Aban Time:	2:26
% Ans Calls:	19.38	% Aban Calls:	18.67

Attachment E
Copies of Sample Trip Time Matrices

CITY TO

REVISED 09/04/08

CITY													
Ft Shafter to Waialae - Kahala	500	600	700	800	900	1000	1100	1200	1300	1400	1500	1600	1700
SALT LAKE													
SALT LAKE-FOSTER VILLAGE-AIRPORT-RED HILL	500	600		800	900	1000	1100	1200	1300		1500		1700
MOANALUA VALLEY-TRIPLER-MAPUNAPUNA	500	600		800	900	1000	1100	1200	1300		1500		1700
AIEA													
AIEA-HALAWA-STADIUM	500	545		800	900	1000	1100	1200	1300		1500		1700
PEARL CITY													
PEARL CITY(NEW TOWN-WAIAU-WAIMALU)	500	545		800	900	1000	1100	1200	1300		1500		1700
WAIPAHU													
WAIPAHU-WAIPIO-ROYAL KUNIA	500	600		800	900	1000	1100	1200	1300		1500		1700
EWA - EWA BEACH													
EWA-EWA BEACH	500	600		800	900	1000		1200	1300		1500		1700
MAKAKILO - KAPOLEI													
BARBER'S PT- KALAELOA -MAKAKILO-KAPOLEI	500	600		800	900	1000		1200	1300		1500		1700
WAIANAE	*0530 FROM KAIMUKI / WAIKIKI							*600 FROM MAKIKI / KALIHI					
NANAKULI-MAILI-WAIANAE-MAKAHA	530*	600*		800	900	1000		1200	1300		1500		1700
HONOKAI HALE	530*	600*		800	900	1000		1200	1300		1500		1700
CENTRAL	*600 from KALIHI ONLY					*700 STARTS FROM KAPAHULU / WAIKIKI / MAKIKI							
MILILANI	500	600*	*700	800	900	1000	1100	1200	1300		1500		1700
WAHIAWA / WHITMORE VILLAGE	500	600*	*700	800	900	1000	1100	1200	1300		1500		1700
NORTH SHORE	*700 STARTS FROM KAPAHULU / WAIKIKI / MAKIKI												
WAIALUA / HALELIWA/ PUPUKEA	500		*700	800	900		1100	1200	1300		1500		1700
WINDWARD													
KANEOHE	545	615		800	900		1130		1300		1500		1700
AHUIMANU / KAHALUU / WAIAHOLE		545		800	900		1130		1300		1500		1700
KAHUKU/LAIE/HAUULA/PUNALUU/KAAAWA		545		800	900		1130		1300		1500		1700
KAILUA	500	600		800	900	1000	1130		1300		1500		1700
WAIMANALO	500	600		800	900	1000	1130		1300		1500		1700
HAWAII KAI													
AINAKOA-AINA HAINA-WAIALAE IKI		600		800	900	1000	1100	1200	1300		1500		1700
KULIOUOU-HAWAII KAI-KALAMA VALLEY		600		800	900	1000	1100	1200	1300		1500		1700

WAIANAE To

REVISED 3/14/06

CITY													
FT SHAFTER - WAIALAE KAHALA	500		700		900		1100	1200	1300	1400	1500	1600	1700
SALT LAKE													
SALT LAKE-FOSTER VILLAGE-AIRPORT-RED HILL	500		700		900		1100	1200	1300	1400	1500	1600	1700
MOANALUA VALLEY-TRIPLER-MAPUNAPUNA	500		700		900		1100	1200	1300	1400	1500	1600	1700
AIEA													
AIEA-HALAWA-STADIUM	500		700		900		1100	1200	1300	1400	1500	1600	1700
PEARL CITY	0600 VAN IS FULL *ONLY* GOING TO WAIMANO HOME RD												
PEARL CITY(NEW TOWN-WAIAU-WAIMALU)	500	600	700		900		1100	1200	1300	1400	1500	1600	1700
WAIPAHU													
WAIPAHU-WAIPIO-ROYAL KUNIA	500	600	700		900	1000	1100	1200	1300	1400	1500	1600	1700
EWA - EWA BEACH													
EWA-EWA BEACH	500		700		900	1000	1100	1200	1300	1400	1500	1600	1700
MAKAKILO - KAPOLEI													
MAKAKILO-KAPOLEI	500		700		900	1000	1100	1200	1300	1400	1500	1600	1700
BARBER'S PT- KALAELOA	500		700		900	1000	1100	1200	1300	1400	1500	1600	1700
WAIANAE	0600/0800 avail ONLY 2 Waipahu-Waikele-Waipio-Kaiser Waipio												
NANAKULI-MAILI-WAIANAE-MAKAHA	500		700		900	1000	1100	1200	******	1400	1500	1600	1700
HONOKAI HALE	500		700		900	1000	1100	1200	1300	1400	1500	1600	1700
CENTRAL													
MILILANI		600		800	able to negotiate 900/1000		1100	TRF	TRF	TRF	1500		TRF
WAHIAWA / WHITMORE VILLAGE		600		800			1100	TRF	TRF	TRF	1500		TRF
NORTH SHORE													
WAIALUA / HALELIWA/ PUPUKEA		600		800			1100	TRF	TRF	TRF	1500		TRF
WINDWARD													
KANEOHE	TRF		TRF		TRF		TRF	TRF	TRF		TRF		TRF
AHUIMANU / KAHALUU	TRF		TRF		TRF		TRF	TRF	TRF		TRF		TRF
KAHUKU/LAIE/HAUULA/PUNALUU/KAAAWA		600		800	TRF		TRF	TRF	TRF		TRF		TRF
KAILUA	TRF		TRF		TRF		TRF	TRF	TRF		TRF		TRF
WAIMANALO	TRF		TRF		TRF		TRF	TRF	TRF		TRF		TRF
HAWAII KAI													
AINA HAINA-WAIALAE IKI	TRF		TRF		TRF		TRF	TRF	TRF	TRF	TRF		TRF
KULIOUOU-HAWAII KAI-KALAMA VALLEY	TRF		TRF		TRF		TRF	TRF	TRF	TRF	TRF		TRF

AVAILABLE

545

MAILI TO WAIANAE DIALYSIS

AVAILABLE

***** 1300 ONLY

WHEN TRAVELING

FROM MAKAHA

HEADING EAST BOUND

AVAILABLE

700

NANAKULI TO MAKAHA

900

NANAKULI TO MAKAHA

Attachment F
Examples of Overly Tight Schedules

Schedule (A)
Run 15210

Schedule Editor - Run Itinerary

Edit View Find Cancel/NoShow Mark Map

View | Options

Sched=[Live 01-27-2010, Wednesday] : Para Run = 15210, Veh = , Cap Type = 4, MUT = 0[SIOTE MATTHEW][Direction=Inbound]

Run	SubT	SpaceOB.F	Client	Schd	Reqd	Slack	Est	Location	Dist	City	Comment
15210				5:15		16	5:31	KALIHI, 811 MIDDLE ST		KALIHI	
15210	DEP	WH1	ACOSTA, DEBRA	6:00			6:00	920697 PAAKAI ST	19.7	KAPOLEI	
15210	DEP	WH2	HINDEMITH, LISA	6:00			6:20	921035 LUAWAINUI ST	5.8	MAKAKILO	
15210	DEP	WH3	LUKE, EDWARD	6:00			6:25	921035 LUAWAINUI ST		MAKAKILO	
15210	DEP	AM1,WH3	MADIRO, SEAN	6:00			6:32	921202 MAKAMAI PL	0.7	KAPOLEI	
15210	DEP	AM2,WH3	HUNTER, WAIOLA	6:01			6:40	920527 UALEHEI ST	1.8	MAKAKILO	
15210	DEP	AM3,WH3	IOLI, ANTHONY	6:00			6:43	920458 AKAULA ST	0.3	MAKAKILO	
15210	DEP	AM4,WH3	KAPULE, TERRY	6:00			6:47	920651 MAKAKILO DR, HA1	0.6	MAKAKILO	
15210	DEP	AM5,WH3	NAKAMURA, TYSON	6:00			6:55	911047 HANAPAA ST	2.0	KAPOLEI	
15210	DEP	AM6,WH3	SALAS, RONALD	6:00			7:06	920985 KANEHOA LOOP	2.7	KAPOLEI	
15210	DEP	AM7,WH3	WEMPLE, JADE	6:00			7:16	910229 PAIA 911047 HANAPAA ST	2.6	KAPOLEI	ALT #391-7506
15210	DEP	AM8,WH3	BARIRING, JEAN	6:00			7:18	910229 PAIAHA PL		KAPOLEI	
15210	DEP	AM9,WH3	ATKINS, EDMUND	6:00			7:32	921177 PUEONANI ST	3.9	KAPOLEI	
15210	DEP	AM8,WH3	BARIRING, JEAN		7:15		8:16	BLAISDELL PARK,KAAHUMANU ST	12.7	WAIMALU	
15210	DEP	AM7,WH3	HUNTER, WAIOLA		7:30		8:17	BLAISDELL PARK,KAAHUMANU ST		WAIMALU	
15210	DEP	AM6,WH3	ATKINS, EDMUND		7:15		8:18	BLAISDELL PARK,KAAHUMANU ST		WAIMALU	
15210	DEP	AM6,WH2	LUKE, EDWARD		7:15		8:23	BLAISDELL PARK,KAAHUMANU ST		WAIMALU	
15210	DEP	AM6,WH1	HINDEMITH, LISA		7:15		8:23	BLAISDELL PARK,KAAHUMANU ST		WAIMALU	
15210	DEP	AM5,WH1	WEMPLE, JADE		8:00		8:23	BLAISDELL PARK,KAAHUMANU ST		WAIMALU	
15210	DEP	AM4,WH1	SALAS, RONALD				8:51	GOODWILL KILIHAU, 2610 KILIHAU ST	7.3	MAPUNAPUN	
15210	DEP	AM3,WH1	IOLI, ANTHONY		7:30		8:52	GOODWILL KILIHAU, 2610 KILIHAU ST		MAPUNAPUN	
15210	DEP	AM2,WH1	MADIRO, SEAN		8:00		9:06	QUEENS COUNSELING CLINICAL SERV,	3.6	NUUANU	ENTER FROM VINEYARD
15210	DEP	AM1,WH1	NAKAMURA, TYSON		8:00		9:14	KAKAAKO PARK,KOULA ST	1.9	KAKAAKO	NEAR JOHN DOMINIS
15210	DEP	WH1	KAPULE, TERRY		8:15		9:15	KAKAAKO PARK,KOULA ST		KAKAAKO	NEAR JOHN DOMINIS
15210	DEP		ACOSTA, DEBRA		8:15		9:20	KAKAAKO PARK,KOULA ST		KAKAAKO	NEAR JOHN DOMINIS
15210				9:45		12	9:32	KALIHI, 811 MIDDLE ST	4.5	KALIHI	

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READY

Start | Tropeze4 - CDBLOG | Tropeze4 Workstatio... | Schedule Editor - Run... | Schedule Booking Wiz... | 5:40 PM

12 pick-ups @ 6 AM that are estimated (realistically) to take 'til 7:32 (later than ~~[illegible]~~ est times for first 5 drop-offs). By last drop-off, running over an hour late on drop-offs.

Schedule (B)

Run 12100

Schedule Editor - Run Itinerary

Edit View Find Cancel/NoShow Mark Map

View | Options

Sched=[Live 01/27/2010 Wednesday] : Pars Run = 12100 Veh = , CapType = 4 MDT = 0[PAONGO,ELENA][Direction= Inbound]

Run	SubT	SpaceOB.F	Client	Sched	Req.	Slack	Est	Location	Dist	City	Comment
12100				4:45		0	4:45	KALIHI, 811 MIDDLE ST		KALIHI	
12100	REC	AM1	BAUTISTA, LEROY	5:00			5:00	1676 KALAUIPO ST	8.7	PEARL CITY	
12100	REC	AM2	OSHIRO, BRENDEN	5:05			5:05	1597 HOOLANA ST	0.7	PEARL CITY	
12100	REC	AM1	BAUTISTA, LEROY		6:30		5:23	2906 KAIHIKAPU ST	8.1	MAPUNAPUN	ALA KONA INC
12100	REC		OSHIRO, BRENDEN		7:00		5:29	GOODWILL KILIHAU, 2610 KILIHAU ST	1.5	MAPUNAPUN	
12100	DEP	AM1	REYNOLDS, VIRGINIA	7:00		1h17	7:00	800 3RD ST, #9 3 28	8.4	PEARL CITY	
12100	REC	AM2	TERADA, NOBUE	7:00			7:10	2036 AANIU LOOP	2.8	PEARL CITY	NEEDS LIFT
12100	DEP	AM3	BEALL, LOREN	7:00			7:19	1357 NANAKAI ST	2.2	PEARL	
12100	SUE	AM4	YAMAMOTO, TSUYUKO	7:00			7:22	1249 NOELANI ST	0.3	PEARL CITY	
12100	REC	AM5	SEKIGAWA, JOAN	7:00			7:23	981421 KAMAHAO ST, #123	1.0	PEARL CITY	
12100	DEP	AM6	OSHITA, DEREK	7:00			7:42	2471 AUMAKUA ST	3.9	PALISADES	
12100	DEP	AM7	PING, ABIGAIL	7:00			7:47	2239 AKEUKEU ST	0.9	PALISADES	
12100	DEP	AM9	NARVAEZ, CLARA	7:00			7:59	HALE O HAUOLI, 950 LUEHU ST, #103	3.0	PEARL CITY	P/U & D/O FRONT ONLY
12100	DEP	AM10	TOYOTA, VIOLET	7:00			8:07	981585 HOOMAIKE ST	1.7	PEARL CITY	
12100	DEP	AM11	SUNIO, FELICIDAD	7:00			8:12	981870 KAAHUMANU ST, #M	1.1	PEARL CITY	SIGN SAYS "HEIGHTS" TURN LFT/RT SALMON C
12100	REC	AM12	OKA, ROBERT	7:05			8:22	1623 MALUAWAI ST	2.4	PEARL CITY	ONLY MILTON (SON) 2 MAKE/CHNGE - ALZHEIME
12100	REC	AM13	IWANE, ANNIE	7:15			8:27	1453 HOOHAKU PL	0.9	PEARL CITY	
12100	DEP	AM11	NARVAEZ, CLARA		8:30		8:33	STRAUB PEARLRIDGE, 980151 PALI MOI	2.6	AIEA	PIKUP IN FRONT OF OLD PRIDGE 4PLEX ON PALI
12100	DEP	AM10	OSHITA, DEREK		8:00		8:42	OUR SAVIOR LUTHERAN SCHOOL, 9810	0.2	AIEA	
12100	REC	AM9	TERADA, NOBUE		8:00		8:46	ST TIMOTHYS CHURCH, 980939 MOANA	0.5	AIEA	KUAKINI SATELLITE
12100	REC	AM8	OKA, ROBERT		8:00		8:47	ST TIMOTHYS CHURCH, 980939 MOANA		AIEA	KUAKINI SATELLITE
12100	SUE	AM7	YAMAMOTO, TSUYUKO				8:50	ST TIMOTHYS CHURCH, 980939 MOANA	0.3	AIEA	KUAKINI SATELLITE
12100	DEP	AM6	SUNIO, FELICIDAD				9:03	USS MISSOURI,FORD ISLAND WY	3.9		
12100	REC	AM5	SEKIGAWA, JOAN		8:30		9:27	GOODWILL KILIHAU, 2610 KILIHAU ST	7.1	MAPUNAPUN	
12100	DEP	AM4	REYNOLDS, VIRGINIA		8:30		9:33	KALAKAUA GYM, 821 MCNEILL ST	2.0	KALIHI	ENTER THROUGH MC NEIL OFF KALIHI ST
12100	DEP	AM3	PING, ABIGAIL		8:30		9:40	KALAKAUA GYM, 821 MCNEILL ST		KALIHI	ENTER THROUGH MC NEIL OFF KALIHI ST
12100	DEP	AM2	TOYOTA, VIOLET		8:00		9:41	KALAKAUA GYM, 821 MCNEILL ST			ST
12100	REC	AM1	IWANE, ANNIE		8:00		9:48	KUAKINI DAYCARE PALI, 1727 PALI HWY	2.9		N-PLS CA

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READY

Start | Trapeze4 - CDBLOG | Trapeze4 Workstatio... | Schedule Editor - Run... | Schedule Booking Wiz... | 5:39 PM

- 12 7-7:15 pick-ups estimated to be completed by 8:27 making all 8-8:30 drop-offs late (some over 90 minutes late)

- Also, one 5:05 pick-up dropped off 91 minutes early to cycle back to start 7 A.M. pick-ups

Schedule (C)

Run 13100

Schedule Editor - Run Itinerary

Edit View Find Cancel/NoShow Mark Map

View | Options

Sched=[Live 01-27-2010 Wednesday] - Para Run = 13100, Veh = , CabType = 4, MDT = 0(NAUAHI,GABRIEL)[Direction=Inbound]

Run	SubT	SpaceOB.F	Client	Schel	Reqt.	Slack	Est	Location	Dist	City	Comment
13100				4:30		53	5:23	KALIHI, 811 MIDDLE ST		KALIHI	
13100	REC	AM1	FARINO, MICHAEL	5:50			5:50	245 VALLEY AVE	18.2	WAHIAWA	
13100	REC	AM2	KUROIWA, GENE	5:55			5:55	955 PEACH ST	1.0	WAHIAWA	
13100	REC	AM3	LAUVAO, JOSEPH	5:55			6:02	524 KULIA ST	2.1	WAHIAWA	
13100	REC	AM4	GABBARD, BARBARA	6:00			6:08	140 KUAHIWI AVE, #B	1.7	WAHIAWA	CaRoLiNe=721-9000 Or CaRoL/MiKe PiNiS oR M Le
13100	DEP	AM5	AGDINADAY, FILOMENA	6:00			6:15	117 KANIKO PL	1.9	WAHIAWA	
13100	REC	AM6	HIRAMOTO, CHRISTOP	6:00			6:24	1214 NEAL AVE	2.2	WAHIAWA	
13100	DEP	AM7	INOUYE, DOUGLAS	6:00			6:28	61 OHAI ST, #A	0.6	WAHIAWA	NEW RES CAREGIVER EDWIN DEVERA
13100	DEP	AM8	KIILI, HERMAN	6:00			6:33	245 VALLEY AVE	1.1	WAHIAWA	
13100	DEP	AM8,WH1	GABAYAN, CATHLEEN	6:00			6:37	1060 KILANI AVE, #APT E03	0.5	WAHIAWA	
13100	DEP	AM8,WH2	MIYAMOTO, DIANNE	6:00			6:47	S15 UAKANIKOO ST	1.7	WHITMORE	HALE KOHAO RENEW
13100	DEP	AM8,SC1,W	REYHER, ERNEST	6:00			6:50	1 IHOIHO PL, #101 A	2.1	WAHIAWA	
13100	DEP	AM9,SC1,W	REVERA, CLARENCE	6:00			7:06	245 VALLEY AVE	0.9	WAHIAWA	
13100	DEP	AM10,SC1,W	WINGATE, GERARD	6:00			7:11	140 KUAHIWI AVE, #B	1.0	WAHIAWA	
13100	DEP	AM10,SC1,W	GABAYAN, CATHLEEN				7:39	LEEWARD COMMUNITY COLLEGE, 9600	8.5	PEARL CITY	
13100	DEP	AM9,SC1,W	WINGATE, GERARD		7:30		7:45	ARC (PEARL CITY), 1174 WAIMANO HOM	2.4	PEARL CITY	
13100	DEP	AM9,SC1	MIYAMOTO, DIANNE		8:00		7:50	BLAISDELL PARK,KAAHUMANU ST	1.4	WAIMALU	
13100	DEP	AM8,SC1	REVERA, CLARENCE		7:30		8:20	GOODWILL KILIHAU, 2610 KILIHAU ST	7.3	MAPUNAPUN	
13100	DEP	AM8	REYHER, ERNEST		7:30		8:34	TRIPLER VA CLINIC, 459 PATTERSON RI	2.5	TRIPLER	NEXT TO G WING-SPARK MATSUNAGA
13100	REC	AM7	HIRAMOTO, CHRISTOP		7:30		8:46	GOODWILL KILIHAU, 2610 KILIHAU ST	3.1	MAPUNAPUN	
13100	REC	AM6	GABBARD, BARBARA		7:30		8:47	GOODWILL KILIHAU, 2610 KILIHAU ST		MAPUNAPUN	
13100	REC	AM5	KUROIWA, GENE		8:00		8:48	GOODWILL KILIHAU, 2610 KILIHAU ST		MAPUNAPUN	
13100	REC	AM4	FARINO, MICHAEL		7:30		8:49	GOODWILL KILIHAU, 2610 KILIHAU ST		MAPUNAPUN	
13100	REC	AM3	LAUVAO, JOSEPH				9:02	LANAKILA CRAFT BACHELOT, 1809 BACI	3.7	LILIHA	ONLY ACTIVE BOARDING & ALIGHTING PERMITTI
13100	DEP	AM2	KIILI, HERMAN		8:00		9:12	KAKAAKO PARK,KOULA ST	2.6	KAKAAKO	NEAR JOHN DOMINIS
13100	DEP	AM1	INOUYE, DOUGLAS		8:15		9:13	KAKAAKO PARK,KOULA ST		KAKAAKO	NEAR JOHN DOMINIS
13100	DEP		AGDINADAY, FILOMENA		9:00		9:21	1516 S KING ST	2.0	HONOLULU	LOCAL 5 HAWAII
13100	SUE	AM1	SUGIMOTO, THELMA	11:00		1h27	11:00	KALAKAUA GYM, 821 MCNEILL ST	4.0	KALIHI	ENTER THROUGH MC NEIL OFF KALIHI ST

READY

Views: 1

start | Trapeze4 - CDBLOG | Trapeze4 Workstatio... | Schedule Editor - Run... | Schedule Booking Wiz... | 5:39 PM

- 13 pick-ups between 5:50 and 6:00 not estimated to be completed until 7:11 making ~~[illegible]~~ many of the 7:30 – 9 am drop-off late, some over an hour late

Schedule (D)

Run 14500

Schedule Editor - Run Itinerary

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View | Options

Sched=Live 01-27-2010 Wednesday - Para Run = 14500 Veh = CapType = 4 MLT = 0 [NATIVIDAD,BRYAN JR] [Direction= Inbound]

Run	SubT	SpaceOB.F	Client	Sched	Reqd	Slack	Est	Location	Dist	City	Comment
14500				6:15		7	6:22	KALIHI, 811 MIDDLE ST		KALIHI	
14500	REC	WH1	DIAS, WILLIAM	6:55			6:55	910109 HALOKO PL	13.3	EWA BEACH	
14500	DEP	AM1,WH1	ROBBINS, RALPH	7:00			7:20	6639 A 111 ST	6.2	EWA BEACH	
14500	DEP	AM2,WH1	TSUCHIDA, MAGNOLIA	7:00			7:30	911054 KAUIKI ST	2.6	EWA BEACH	
14500	DEP	AM3,WH1	MOLINA, RENEE	7:00			7:39	6445 102ND ST, #8	2.3	IROQUOIS P	
14500	DEP	AM4,WH1	ANTONIO, EDWARD	7:00			7:52	910540 POHAKUPUNA RD	3.3	EWA BEACH	RESPITE
14500	REC	AM5,WH1	HIRAI, DEAN	7:10			7:57	911035 NORTH RD	1.0	EWA BEACH	DONT LEAVE UNATTENDED 499-7470- GLORIA/PLE
14500	DEP	AM6,WH1	LYONS, NEIL	7:00			8:01	910933 HAIAMU ST	0.6	EWA BEACH	
14500	DEP	AM7,WH1	HATICO, MISTYANN	7:00			8:11	911200 KEAUNUI DR, #619	2.4	EWA BEACH	2nd EWA BY GENTRY-Trn LF frm Ft Weaver to Keaun
14500	DEP	AM7,WH2	MERCADO, LYDIA	7:00			8:19	911328 HOOPIO ST	1.7	EWA BEACH	
14500	DEP	AM6,WH2	ROBBINS, RALPH		9:00		9:07	TRIPLER VA CLINIC, 459 PATTERSON RI	13.7	TRIPLER	NEXT TO G WING-SPARK MATSUNAGA
14500	REC	AM5,WH2	HIRAI, DEAN		9:30		9:25	LANAKILA CRAFT 911328 HOOPIO ST ACI	4.9	LILIHA	ONLY ACTIVE BOARDING & ALIGHTING PERMITTEC
14500	DEP	AM4,WH2	TSUCHIDA, MAGNOLIA		9:00		9:23	LANAKILA HEALTH CENTER, 1700 LANA	0.7	LANAKILA	PU/DO IN PRKNG LOT MAUKA SIDE BY HANDI CAP
14500	DEP	AM3,WH2	ANTONIO, EDWARD		8:15		9:40	KAKAAKO PARK,KOULA ST	2.9	KAKAAKO	NEAR JOHN DOMINIS
14500	DEP	AM2,WH2	HATICO, MISTYANN		8:30		9:41	KAKAAKO PARK,KOULA ST		KAKAAKO	NEAR JOHN DOMINIS
14500	DEP	AM1,WH2	MOLINA, RENEE		8:15		9:42	KAKAAKO PARK,KOULA ST		KAKAAKO	NEAR JOHN DOMINIS
14500	DEP	WH2	LYONS, NEIL		9:15		9:43	KAKAAKO PARK,KOULA ST		KAKAAKO	NEAR JOHN DOMINIS
14500	DEP	WH1	MERCADO, LYDIA		8:30		9:53	ALA MOANA CENTER, 1450 ALA MOANA	1.9	ALA MOANA	POST OFFICE
14500	REC		DIAS, WILLIAM		9:00		10:09	SECOH--DH, 708 PALEKAUA ST	5.9	DIAMOND HE	
14500				13:30		3h04	10:25	KALIHI, 811 MIDDLE ST	9.4	KALIHI	

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READY

start | Trapeze4 - CDBLOG | Trapeze4 Workstatio... | Schedule Editor - Run... | Schedule Booking Wiz... | 5:40 PM

9 pickups between 655 and 710. Estimated to be completed by 818, making most of the 815 to 930 drop-off lots, one 69 minutes late

Schedule (E)

Run 16610

Schedule Editor - Run Itinerary

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View | Options

Schedule Date 01-27-2010 Wednesday | Para Run = 16610 Veh = | CapType = 4 MDT = OAHAGARAN RAMON | Direction = Inbound

	Run	SubT	SpaceOB.F.	Client	Sched	ReqL	Slack	Est	Location	Dist	City	Comment
	16610				6:30			6:30	KALIHI, 811 MIDDLE ST		KALIHI	
	16610	REC	AM1	SAKAGUCHI, CLIFFORD	7:00			7:00	941292 HUAKAI ST	10.7	WAIPAHU	brother 699-8850
	16610	REC	AM2	SMITH, STEVEN	7:00			7:14	940784 KAAKA ST	3.9	WAIPAHU	PLS CALL 429-1666 5 MIN B4 P/U
	16610	DEP	AM3	ORTIZ, BARBARA	7:00			7:27	940272 PUPUKOAE ST	3.3	WAIPAHU	
	16610	DEP	AM4	RAPOZA, ALFRED	7:00			7:29	940314 WAIKELE RD	0.1	WAIPAHU	
	16610	DEP	AM5	HINES, BRIAN	7:00			7:37	940572 APII PL	1.9	WAIPAHU	P/D FNTG ADDSS/CALL DISPATCH IF ILLEGALLY P
	16610	DEP	AM6	RUIZ, STANLEY	7:00			7:44	940455 KAHUALENA ST	1.6	WAIPAHU	
	16610	DEP	AM7	COLEMAN, CATHERINE	7:00			7:47	941528 WAIPAHU ST	0.1	WAIPAHU	
	16610	DEP	AM8	HOOKAHI, LARRY	7:00			7:57	940274 WAIPAHU ST, #241	2.4	WAIPAHU	
	16610	DEP	AM9	ANDREWS, FREDERICK	7:00			8:00	940338 APOWALE ST	0.5	WAIPAHU	
	16610	REC	AM10	TOMA, REID	7:00			8:05	940593 LOAA ST	0.8	WAIPAHU	
	16610	REC	AM11	FAUMUINA, JOHN	7:00			8:14	940192 KIME PL	2.4	VILLAGE PAI	
	16610	REC	AM10	FAUMUINA, JOHN		8:30		9:07	LANAKILA CRAFT BACHELOT, 1609 BACI	15.7	LILIHA	ONLY ACTIVE BOARDING & ALIGHTING PERMITTED
	16610	REC	AM9	TOMA, REID				9:09	LANAKILA CRAFT BACHELOT, 1609 BACI	0.1	LILIHA	ONLY ACTIVE BOARDING & ALIGHTING PERMITTED
	16610	DEP	AM8	ANDREWS, FREDERICK		8:15		9:19	KAKAAKO PARK,KOULA ST	2.6	KAKAAKO	NEAR JOHN DOMINIS
▶	16610	DEP	AM7	HOOKAHI, LARRY		8:30		9:20	KAKAAKO PARK,KOULA ST		KAKAAKO	NEAR JOHN DOMINIS
	16610	DEP	AM6	ORTIZ, BARBARA		8:15		9:21	KAKAAKO PARK,KOULA ST		KAKAAKO	NEAR JOHN DOMINIS
	16610	DEP	AM5	RUIZ, STANLEY		8:15		9:22	KAKAAKO PARK,KOULA ST		KAKAAKO	NEAR JOHN DOMINIS
	16610	DEP	AM4	COLEMAN, CATHERINE		8:15		9:23	KAKAAKO PARK,KOULA ST		KAKAAKO	NEAR JOHN DOMINIS
	16610	DEP	AM3	HINES, BRIAN		8:15		9:24	KAKAAKO PARK,KOULA ST		KAKAAKO	NEAR JOHN DOMINIS
	16610	DEP	AM2	RAPOZA, ALFRED		8:30		9:25	KAKAAKO PARK,KOULA ST		KAKAAKO	NEAR JOHN DOMINIS
	16610	REC	AM1	SMITH, STEVEN		8:30		9:36	815 WAIAKAMILO RD	2.9	KALIHI	JOE MCOMBER @ SFTY SYSTMS 306-5270(PM 5 MI
	16610	REC		SAKAGUCHI, CLIFFORD		9:00		9:49	2145 KUHIO AVE	5.7	WAIKIKI	BLUE WATER SHRIMP & SEAFOOD pu/do kuhio ave
	16610				9:30			9:59	KALIHI, 811 MIDDLE ST	6.2	KALIHI	

READY

Start | Trapeze4 - CDBLOG | Trapeze4 Workstatio... | Schedule Editor - Run... | Schedule Booking Wiz... | 5:42 PM

11 pick-ups @ 7 am, estimated to be completed by 8:14 am. All 8:15 to 9 am drop-offs but for appointments – one by 66 minutes

Schedule (F)

Run 17510

Schedule Editor - Run Itinerary

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View | Options

Schedule[Date 01/27/2010 Wednesday] Para Run = 17510 Veh = . CapType = 4 MDT = 0 CEZAR RUESEN [Direction = Inbound]

Run	SubT	SpaceOB.F.	Client	Sched	Req.L	Slack	Est	Location	Dist	City	Comment
17510				7:15		24	7:39	KALIHI, 811 MIDDLE ST		KALIHI	
17510	DEP	AM1	NISHIMOTO, GRACE	8:00			8:00	951050 MAKAIKAI ST, #10P	14.9	MILILANI MA	
17510	DEP	AM2	SNYDER, JOHN	8:00			8:07	950580 KANAMEE ST	1.6	MILILANI	
17510	REC	AM3	NISHIMURA, SUMIYE	8:05			8:13	950159 WAIMAKUA DR	1.1	MILILANI	
17510	REC	AM5	KOBUKE, TAKASHI	8:20			8:20	940352 HAKAMOA ST	1.5	MILILANI	
17510	DEP	AM6	BELISARIO, JULIA	8:00			8:34	950269 WAIKALANI DR	4.0	MILILANI	
17510	DEP	AM7	RAMOS, ANDREW	8:00			8:43	950009 WAIKALANI DR, #202A	2.6	MILILANI	WAIKALANI WOODLAWNS/ PKG LOT 1ST BLDG.
17510	DEP	AM8	CARLOS, KATHERINE	8:00			8:51	951072 EULU ST	2.0	MILILANI	WALKER
17510	DEP	AM9	NAGAMINE, LISA	8:00			9:02	940345 HOKUAHIAHI ST, #122	2.7	MILILANI	
17510	DEP	AM10	CANMAR, CHARLES	8:00			9:07	940325 ANANIA, #2	1.1	MILILANI	ONEWAY
17510	DEP	AM11	OLIVEIRA, DEBORAH	8:00			9:18	951499 AINAMAKUA DR, #72	2.6	MILILANI MA	ONLY BEVERLY OR STEPHANIE CAN DL OR MAKE
17510	DEP	AM10	SNYDER, JOHN		9:30		9:35	LEEWARD COMMUNITY COLLEGE, 9600	6.7	PEARL CITY	
17510	REC	AM8	KOBUKE, TAKASHI				9:42	980330 KAAHELE ST	2.2	AIEA	NEW TOWN GOLF DRIVING RANGE
17510	DEP	AM7	NISHIMOTO, GRACE		9:15		9:47	PEARLRIDGE SHOPPING CENTER, 9810	0.7	PEARLRIDGE	ZIPPY'S FRONT ENTRANCE
17510	DEP	AM6	CANMAR, CHARLES		9:15		10:00	TRIPLER VA CLINIC, 459 PATTERSON RI	5.5	TRIPLER	NEXT TO G WING-SPARK MATSUNAGA
17510	DEP	AM5	NAGAMINE, LISA		9:45		10:09	KALIHI DENTAL GROUP, 2153 N KING ST	2.7	KALIHI	PIONEER PLAZA BLDG
17510	DEP	AM4	CARLOS, KATHERINE		10:30		10:18	KALAKAUA GYM, 821 MCNEILL ST	0.9	KALIHI	ENTER THROUGH MC NEIL OFF KALIHI ST
17510	DEP	AM3	RAMOS, ANDREW		10:00		10:2	HAWAII HOUSING AUTHORITY, 1002 N S	1.3	KALIHI	
17510	DEP	AM2	OLIVEIRA, DEBORAH		9:30		10:3	KALAKAUA GYM, 821 MCNEILL ST 500 KAPIOLA	2.0	HONOLULU	
17510	DEP	AM1	BELISARIO, JULIA		10:00		10:33	ALA MOANA CENTER, 1450 ALA MOANA	1.9	ALA MOANA	POST OFFICE
17510	REC		NISHIMURA, SUMIYE		9:30		10:44	OAHU CARE FACILITY, 1808 S BERETAN	2.0	MCCULLY	
17510				9:30			10:53	KALIHI, 811 MIDDLE ST	5.1	KALIHI	

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READY

start | Trapeze4 - CDBLOG | Trapeze4 Workstatio... | Schedule Editor - Run... | Schedule Booking Wiz... | 5:41 PM

10 pick-ups between 8 and 820 am. Estimated to not be completed until 9:18 am. All drop-offs late, are 74 minutes late

Schedule (G)

Run 21400

Schedule Editor - Run Itinerary

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View | Options

Sched=[Live 01/27/2010 Wednesday] - Para Run = 21400 Veh = , CopType = 4 MDT = 0[BRITTO,GLENN][Direction=Inbound]

Run	SubT	SpaceOB,F	Client	Sched	ReqU	Slack	Est	Location	Dist	City	Comment
21400				12:45		6	12:51	KALIHI, 811 MIDDLE ST		KALIHI	
21400	DEM	AM1	RESURRECCION, ANN	13:00			13:00	STRAUB HOSPITAL, 888 S KING ST	4.6	HONOLULU	PICKUP AND DROPOFF AT E
21400	DEM	AM2	FEBRERO, MARK	13:00			13:02	ACADEMY ART CENTER, 1111 VICTORIA ST	0.2	HONOLULU	
21400	DEM	AM3	RAMENTO, GABRIEL	13:00			13:04	ACADEMY ART CENTER, 1111 VICTORIA ST, #12		HONOLULU	
21400	DEM	AM4	SWEAZEY, CANDICE	13:00			13:09	QUEENS COUNSELNG CLINICAL SERV, 1374 NU	1.3	NUUANU	ENTER FROM VINEYARD
21400	DEM	AM5	TAKAOKA, KIMIKO	13:00			13:16	3055 PUIWA LN	2.5	NUUANU	NUUANU ELEMENTARY SCI
21400	DEM	AM5,WH1	VILLANUEVA, ROBERT	13:00			13:24	RIVER OF LIFE (MISSION), 101 PAUAHI ST	2.9	NUUANU	
21400	DEM	AM6,WH1	QUACH, JONAH	13:00			13:33	LANAKILA KITCHEN , 1809 BACHELOT ST	1.2	LILIHA	O/W
21400	DEM	AM5,WH1	RESURRECCION, ANN				14:12	921060 LUAWAINUI ST	21.6	KAPOLEI	
21400	DEM	AM4,WH1	FEBRERO, MARK		14:30		14:23	920527 KOKOLE ST	2.7	KAPOLEI	ONLY PARENTS TO MAKE/
21400	DEM	AM3,WH1	QUACH, JONAH		14:30		14:29	911006 OANIANI ST	1.6	KAPOLEI	
21400	DEM	AM2,WH1	TAKAOKA, KIMIKO		14:30		14:37	911059 KEKUILANI LOOP, #U1905	1.8	KAPOLEI	
21400	DEM	AM1,WH1	RAMENTO, GABRIEL		15:00		15:00	870215 KIPAIPAI PL	9.0	MAILI	
21400	DEM	WH1	SWEAZEY, CANDICE		15:00		15:20	651115 WAIANAE VALLEY RD	6.8	WAIANAE	
21400	DEM		VILLANUEVA, ROBERT		15:00		15:39	840390 JADE ST	4.1	WAIANAE	
21400	REG-	AM1	PONGASI, GLORIA	15:00			16:04	KOKUA MAU - NANAKULI, 870110 NANAIKEOLA	7.7	NANAKULI	ACRS KAISER CLINIC BHIND
21400	DEM	AM2	HULEN, ASHLEY	15:00			16:05	KOKUA MAU - NANAKULI, 870110 NANAIKEOLA		NANAKULI	ACRS KAISER CLINIC BHIND
21400	REG-	AM3	GOLIS, ROCHELLE	15:00			16:07	KOKUA MAU - NANAKULI, 870110 NANAIKEOLA		NANAKULI	ACRS KAISER CLINIC BHIND
21400	REG-	AM2	GOLIS, ROCHELLE				16:13	890493 PUAKOLU ST	1.2	NANAKULI	
21400	DEM	AM1	HULEN, ASHLEY		16:00		16:57	910978 OLOLANI ST	12.9	EWA BEACH	
21400	REG-		PONGASI, GLORIA				17:40	730 WILIKINA DR, #805	12.8	WAHIAWA	
21400				19:30		1h02	18:27	KALIHI, 811 MIDDLE ST	16.9	KALIHI	

READY

Start | Trapeze1 Works... | Schedule Edito... | 3 Internet Expl... | Microsoft Excel -... | Trapeze1 - CDBL... | 8:58 PM

Seven 1 pm pick-ups dropped off between 2:30 and 3 p.m. Pick-ups not completed until 3:39 pm, making 3 pick-ups at 3 pm over an hour late, and a 4 pm drop-off 57 minutes late.

Schedule (H)

Run 16820

Schedule Editor - Run Itinerary

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Sched=[Live 01-27-2010 Wednesday] - Para Run = 16820 Veh = CapType = 4 MDT = 0[KAILUA/KEOLANUI] Direction = Inbound]

Run	SubT	SpaceOB F	Client	Sched	Regl	Stock	Est	Location	Dist	City	Comment
16820				12:45		8	12:53	KALIHI, 811 MIDDLE ST		KALIHI	
16820	DEM	AM1	AQUINO, DAMON	13:00			13:00	WINNERS AT WORK, 414 KUWILI ST	2.9	IMILEI	
16920	DEM	AM3	GASTON, MAYROSE	13:00			13:06	REHAB HOSP KUAKINI, 226 N KUAKINI ST	1.3	LILIHA	BACK WHEN STANDING BY
16820	DEM	AM2	AQUINO, DAMON		14:00		13:23	1273 ALA ALOALO	6.8	SALTLAKE	.
16820	DEM		GASTON, MAYROSE		14:00		13:28	1007 PUOLO DR	0.6	SALT LAKE	
16820	REG-	AM1	NONAKA, JONATHAN	14:00		23	14:00	HALE AINA DINING,KUNTZ AVE	2.3	HICKAM AFB	BLDG 1660
16820	REG-		NONAKA, JONATHAN		15:30		14:16	990940 IWAENA ST	5.4	AIEA	HAWAII MEGA-COR INC.
16820	SUB-	AM1	AHNEE, KENNETH	14:30		5	14:30	ARC (PEARL CITY), 1174 WAIMANO HOME RD	4.5	PEARL CITY	
16820	SUB-	AM1XL1	CASH, URSULA (JACKIE)	14:30			14:32	ARC (PEARL CITY), 1174 WAIMANO HOME RD		PEARL CITY	
16820	SUB-	AM2XL1	EDWARD, CAROL	14:30			14:37	ARC (PEARL CITY), 1174 WAIMANO HOME RD		PEARL CITY	
16820	DEM	AM3XL1	ITOKAZU, LYLEN	14:30			14:38	ARC (PEARL CITY), 1174 WAIMANO HOME RD	0.1	PEARL CITY	
16820	SUB-	AM4XL1	KAMA, JAMES	14:30			14:40	ARC (PEARL CITY), 1174 WAIMANO HOME RD	0.1	PEARL CITY	
16920	SUB-	AM4,WH1XL1	LALIN, MELODY	14:30			14:42	ARC (PEARL CITY), 1174 WAIMANO HOME RD		PEARL CITY	
16920	SUB-	AM5,WH1XL1	TANAKA, KEVIN	14:30			14:47	ARC (PEARL CITY), 1174 WAIMANO HOME RD		PEARL CITY	
16820	SUB-	AM5,WH1XL3	DUDOIT, NATALIE	14:30			14:48	ARC (PEARL CITY), 1174 WAIMANO HOME RD		PEARL CITY	
16020	SUB-	AM5,WH1XL1	DUDOIT, NATALIE		16:00		15:34	910824 HANAKAHI ST, #B	9.5	EWA BEACH	
16820	SUB-	AM4,WH1XL1	TANAKA, KEVIN		15:45		15:37	910824 HANAKAHI ST	0.2	EWA BEACH	
16820	SUB-	AM4XL1	LALIN, MELODY		16:00		15:42	910824 HANAKAHI ST	0.2	EWA BEACH	
16820	SUB-	AM3XL1	KAMA, JAMES		16:00		15:44	910824 HANAKAHI ST		EWA BEACH	
16820	DEM	AM2XL1	ITOKAZU, LYLEN		15:30		15:47	910824 HANAKAHI ST	0.2	EWA BEACH	
16820	SUB-	AM1XL1	EDWARD, CAROL		16:00		15:50	910824 HANAKAHI ST	0.2	EWA BEACH	
16820	SUB-	AM1	CASH, URSULA (JACKIE)		16:30		15:55	910824 HANAKAHI ST		EWA BEACH	
16820	SUB-		AHNEE, KENNETH				15:57	910824 HANAKAHI ST	0.2	EWA BEACH	
16820	SUB-	AM1	TENGAN, JOHN	15:30			16:14	HOME & COMM SERVICE-WAIPAHU, 940216 FAF	5.3	WAIPAHU	LEEtownCTR BLDG IN BCK O
16820	SUB-	AM2	PUU, MAXINE	15:30			16:16	HOME & COMM SERVICE-WAIPAHU, 940216 FAF		WAIPAHU	LEEtownCTR-BLDG IN BCK O
16820	SUB-	AM3	PUU, NANCY	15:30			16:17	HOME & COMM SERVICE-WAIPAHU, 940216 FAF		WAIPAHU	LEEtownCTR BLDG IN BCK O
16820	SUB-	AM3,WH1	ISHIMA, JOYCE	15:30			16:18	HOME & COMM SERVICE-WAIPAHU, 940216 FAF		WAIPAHU	LEEtownCTR-BLDG IN BCK O
16820	SUB-	AM4,WH1	ARIYOSHI, ERIC	15:30			16:23	HOME & COMM SERVICE-WAIPAHU, 940216 FAF		WAIPAHU	LEEtownCTR-BLDG IN BCK O
16820	REG-	AM4,WH2	KINOSHITA, CHARLES	15:30			16:24	HOME & COMM SERVICE-WAIPAHU, 940216 FAF		WAIPAHU	LEEtownCTR-BLDG IN BCK O
16820	REG-	AM4,WH1	KINOSHITA, CHARLES		16:30		16:40	910583 HOOILO PL	4.1	EWA BEACH	
16820	SUB-	AM4	ISHIMA, JOYCE		16:30		17:01	910818 LAPINE PL	2.6	EWA BEACH	
16820	SUB-	AM3	ARIYOSHI, ERIC		17:00		17:04	911078 KAUNOLU ST	0.3	EWA BEACH	
16820	SUB-	AM2	PUU, NANCY		17:00		17:31	920665 WAINOHIA ST	7.8	MAKAKILO	
16020	SUB-	AM1	PUU, MAXINE		17:00		17:32	920665 WAINOHIA ST		KAPOLEI	
16820	SUB-		TENGAN, JOHN		17:00		17:47	920365 PAAKAI PL	4.0	HONOKAI HAI	
16820				17:30			18:42	KALIHI, 811 MIDDLE ST	19.3	KALIHI	

READY

Start | Trapeze1 Works... | Schedule Edito... | 3 Internet Expl... | Microsoft Excel -... | Trapeze1 - CDBL... | 8:57 PM

Six 3:30 pm pick-up schedule to begin 44 minutes late and not completed until 4:24 p.m.

Schedule (I)

Run 16620

Schedule Editor - Run Itinerary

Edit View Find Cancel/NoShow Mark Map

View | Options

Sched=[Live 01-27-2010, Wednesday] - Pass Run = 16620, Veh = , CapType = 4, MDT = 0(ANAGARAU RAMOLI)(Direction = Inbound)

Run	SubT	SpaceOB,F	Client	Sched	ReqL	Slack	Est	Location	Dist	City	Comment
16620				12:45		2	12:47	KALIHI, 811 MIDDLE ST		KALIHI	
16620	DEM	AM2	COUILLARD, RICHARD	13:00			13:00	DON QUIXOTE - PEARL CITY, 850 KAM HWY	7.6	PEARL CITY	Food Court
16620	DEM		COUILLARD, RICHARD		14:00		13:07	800 3RD ST, #A308	0.4	PEARL CITY	
16620	DEM	AM1	HERODIES, RICARDO	14:00		21	14:00	6184 IBIS AVE, #B	11.1	IROQUOIS PT	
16620	DEM		HERODIES, RICARDO				14:30	KAPOLEI DIALYSIS, 555 FARRINGTON HWY	8.1	KAPOLEI	FMC DIALYSIS CENTER
16620	DEM	WH1	GATES, LOUIS	15:00		20	15:00	SECOH-WAIPAHU, 940226 LEOKU ST	5.7	WAIPAHU	AM PU IN BACK OF BLDG Pl
16620	DEM	AM1,WH1	WALKER, ELIJAH	15:00			15:06	SECOH-WAIPAHU, 940226 LEOKU ST		WAIPAHU	AM PU IN BACK OF BLDG Pl
16620	REG	AM1,WH2	LEUNG, PAN YEE	15:00			15:08	SECOH-WAIPAHU, 940226 LEOKU ST		WAIPAHU	AM PU IN BACK OF BLDG Pl
16620	SUB	AM1,WH3	PABILONA, SHEILA	15:00			15:13	SECOH-WAIPAHU, 940226 LEOKU ST		WAIPAHU	AM PU IN BACK OF BLDG Pl
16620	SUB	AM1,WH4	GOKAN, ALBERT	15:00			15:18	SECOH-WAIPAHU, 940226 LEOKU ST		WAIPAHU	AM PU IN BACK OF BLDG Pl
16620	REG	AM1,WH4,XL2	MOSSMAN, BRUCE	15:00			15:23	SECOH-WAIPAHU, 940226 LEOKU ST		WAIPAHU	AM PU IN BACK OF BLDG Pl
16620	REG	AM1,WH4	MOSSMAN, BRUCE		16:30		15:45	940374 APOWALE ST	0.8	WAIPAHU	
16620	SUB	AM1,WH3	GOKAN, ALBERT		16:15		15:57	941185 HINAEA ST	1.9	WAIPAHU	
16620	SUB	AM1,WH2	PABILONA, SHEILA		16:15		16:02	941185 HINAEA ST		WAIPAHU	
16620	REG	AM1,WH1	LEUNG, PAN YEE		16:00		16:08	940969 KUHAULUA ST	0.4	WAIPAHU	
16620	DEM	WH1	WALKER, ELIJAH				16:22	941040 KUHAULUA ST	3.9	WAIPAHU	NEED LIFT
16620	DEM		GATES, LOUIS				16:27	941040 KUHAULUA ST		WAIPAHU	
16620	DEM	WH1	FUNAKI, DORIS	16:00			16:30	HONGWANJI MISSION WAIPAHU ADC, 940821 K	0.7	WAIPAHU	
16620	DEM	WH2	MIKAMI, MARIAN	16:00			16:35	HONGWANJI MISSION WAIPAHU ADC, 940821 K		WAIPAHU	
16620	REG	AM1,WH2	MASUOKA, BETTY	16:00			16:40	HONGWANJI MISSION WAIPAHU ADC, 940821 K		WAIPAHU	
16620	SUB	AM2,WH2	NAKAMURA, SHIZUKO	16:00			16:42	HONGWANJI MISSION WAIPAHU ADC, 940821 K	0.1	WAIPAHU	
16620	REG	AM3,WH2	TANIGUCHI, STELLA	16:00			16:44	HONGWANJI MISSION WAIPAHU ADC, 940821 K	0.1	WAIPAHU	
16620	SUB	AM3,WH3	CARTER, FRANCES	16:00			16:50	WAIPAHU HALE, 940830 HIKIMOE ST	1.3	WAIPAHU	
16620	DEM	AM4,WH3	WASA, JAMES	16:00			16:55	WAIPAHU HALE, 940830 HIKIMOE ST		WAIPAHU	
16620	DEM	AM5,WH3	TAIRA, ALICE	16:00			16:57	WAIPAHU HALE, 940830 HIKIMOE ST		WAIPAHU	
16620	DEM	AM4,WH3	TAIRA, ALICE				17:11	1773 HOOHOIHOI PL	4.1	PEARL	
16620	REG	AM3,WH3	TANIGUCHI, STELLA				17:22	2385 KOMO MAI DR	2.7	PALISADES	MAY BE LEFT ALONE AS PE
16620	SUB	AM2,WH3	NAKAMURA, SHIZUKO		17:15		17:35	1265 PUU PONI ST	3.5	PEARL CITY	
16620	REG	AM1,WH3	MASUOKA, BETTY				17:46	990409 AHEAHE ST	3.4	AIEA	NEEDS LIFT
16620	DEM	WH3	WASA, JAMES		17:30		18:04	1604 ALA MAHAMOE ST	4.9	MOANALUA	DONT LV ATTENDED/HONK
16620	DEM	WH2	MIKAMI, MARIAN		17:30		18:20	1430 IAO LN	3.4	PALAMA	
16620	DEM	WH1	FUNAKI, DORIS		17:30		18:25	1430 IAO LN		PALAMA	
16620	SUB		CARTER, FRANCES		17:30		18:39	1239 S KING ST, #312	2.6	HONOLULU	DONT LV UNATTENDED
16620				17:30			18:50	KALIHI, 811 MIDDLE ST	4.6	KALIHI	

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8 4:00 pm pick-ups not scheduled to begin until 4:30 pm and not completed until 4:57 pm (due to earlier schedule demands).

Attachment G
Ridership Estimates Based on National TCRP Demand Estimation Model

TCRP Project B-28
Estimation Tool for ADA Complementary Paratransit Demand

	Input Values
ADA service area population (2000 Census)	909,863
Base fare for ADA paratransit (Dollars)	$2.00
Percent of applicants for ADA paratransit eligibility found conditionally eligible	60.0
Conditional trip screening	0
Percent of the population in the ADA service area in households with 1999-2000 income below the poverty line	8.5
Effective on-time window for ADA paratransit (minutes)	30

	Results
Predicted Annual Ridership per Capita	0.40
Predicted Annual Ridership	361,664

Confidence Intervals for Mean Value for Systems with the Characteristics Entered

	Trips per Capita	Annual Ridership
Upper 95% confidence limit	0.73	664,541
Upper 90% confidence limit	0.66	598,513
Lower 90% confidence limit	0.24	218,543
Lower 95% confidence limit	0.22	196,829