

**Guam Regional Transit Authority (GRTA)
U.S. Territory of Guam**

**ADA Complementary Paratransit Service
Compliance Review**

February 9–12, 2010

Summary of Observations

Prepared for

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

Prepared by

**Planners Collaborative, Inc.
with
TranSystems Corporation**

Final Report: April 3, 2012

CONTENTS

1	Purpose of the Review	1
2	Overview.....	3
2.1	Pre-Review	3
2.2	On-Site Review	4
3	Background.....	7
3.1	Description of Fixed Route and Demand-Responsive Services.....	7
3.2	Description of ADA Complementary Paratransit Service.....	9
3.3	ADA Complementary Paratransit Performance Policies and Standards	10
3.4	Consumer Input.....	11
4	Summary of Findings	13
4.1	ADA Complementary Paratransit Service Criteria.....	13
4.2	ADA Complementary Paratransit Eligibility Process	13
4.3	Telephone Access.....	14
4.4	Trip Reservations and Scheduling.....	14
4.5	Service Performance	14
4.6	Resources	16
5	ADA Complementary Paratransit Service Criteria	17
5.1	Consumer Input.....	17
5.2	Type of Service	17
5.3	Service Area	18
5.4	Days and Hours of Service.....	18
5.5	Fares	19
5.6	Trip Purpose	19
5.7	Coordination with Adjacent Service Providers	20
5.8	Complaint-Handling Process	20
5.9	Findings.....	22
5.10	Recommendations	23
6	ADA Complementary Paratransit Eligibility	25
6.1	Consumer Input.....	25
6.2	Overview of the Eligibility Determination Process and Materials.....	25
6.3	Process Observations and Reviews of Recent Determinations.....	30
6.4	No-Show Suspension Policy	30
6.5	Findings.....	31
6.6	Recommendations	32
7	Telephone Access	35
7.1	Consumer Input.....	35
7.2	Phone Service Standards and Performance Monitoring	35
7.3	Phone System Design	35
7.4	Reservations and Dispatch Staffing.....	36
7.5	Observations of the Call-Handling Process	36
7.6	Telephone Performance Reports	36
7.7	Findings.....	37
7.8	Recommendations	37
8	Trip Reservations Process	39

8.1	Consumer Input.....	39
8.2	Service Standards	40
8.3	Review of Recorded Trip Denials	40
8.4	Observations of the Handling of Trip Requests	41
8.5	Trip Confirmations	43
8.6	Findings.....	43
8.7	Recommendations	43
9	Service Performance	45
9.1	Consumer Input.....	45
9.2	Service Standards and Policies.....	46
9.3	Daily Operations.....	46
9.4	Driver Interviews.....	47
9.5	On-Time Performance	49
9.6	No-Show and Missed-Trip Coding	51
9.7	On-Board Travel Times.....	51
9.8	Findings.....	55
9.9	Recommendations	56
10	Resources	57
10.1	Consumer Input	57
10.2	Vehicle Fleet and Vehicle Availability	57
10.3	Staffing and Operator Training	59
10.4	Run Coverage	60
10.5	Other Resources	61
10.6	Planning, Budgeting, and Funding	61
10.7	Ridership.....	62
10.8	Findings.....	63
10.9	Recommendations	63

ATTACHMENTS

Attachment A	GRTA Response to Draft Report
Attachment B	FTA Notification Letter to GRTA
Attachment C	Review Schedule
Attachment D	Rider Interview Questions
Attachment E	GRTA Complaint Form
Attachment F	ADA Paratransit Eligibility Application Form
Attachment G	Sample Eligibility Determination Letters
Attachment H	ADA Paratransit ID Card
Attachment I	Appeals Process for Eligibility
Attachment J	Percent Subscription Trips of All Scheduled Trips, December 1–7, 2009
Attachment K	Sample Denials Log
Attachment L	Sample Reservations Log
Attachment M	Estimation of ADA Complementary Paratransit Demand

1 Purpose of the Review

The U.S. Department of Transportation (DOT) regulations implementing the Americans with Disabilities Act of 1990 (ADA) requires public entities that operate fixed route transportation services for the general public 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 that 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 compliance 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 established standards (or typical practices if standards do not exist). The examination of patterns or practices includes looking not just at service statistics, but also at basic service records and operating documents, and observing service to determine whether records and documents appear to reflect true levels of service delivery. Input is also gathered from local disability organizations and riders. Guidance is provided to assist the transit agency in monitoring service for capacity constraints.

FTA conducted a review of ADA complementary paratransit service provided by the Guam Regional Transit Authority (GRTA) of Hagatna, Guam from February 9–12, 2010. Planners Collaborative, Inc. and TranSystems Corporation, both located in Boston, Massachusetts, conducted the review for the FTA Office of Civil Rights. The review focused primarily on compliance of GRTA's ADA complementary paratransit service with the requirement in the DOT ADA regulations that this service be operated without capacity constraints (49 CFR § 37.131(f)).

The review also examined compliance of GRTA's ADA complementary paratransit service with the requirements related to eligibility determinations, rider assistance policies, service area, response time, fares, trip purposes, days and hours of service, and coordination with other ADA complementary paratransit services in the area. Sections 37.123 through 37.127 of the DOT ADA regulations require that a process be established for determining who is ADA complementary paratransit eligible and that determinations of eligibility be 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 between origins and destinations within $\frac{3}{4}$ -mile of a fixed bus route, and between points within a $\frac{3}{4}$ -mile radius of two different rail stations. Section 37.131(b) requires that "next-day" service be provided. Section 37.131(c) limits ADA complementary paratransit fares to no more than twice the full fixed route fare for a comparable trip. Section 37.131(d) requires

that ADA complementary paratransit service be provided without restrictions or priorities placed on trip purpose. Section 37.131(e) requires that ADA complementary paratransit service be provided during all days and hours that fixed route service is provided. Section 37.139(g) requires that plans for ADA complementary paratransit service address efforts to coordinate with other public entities that have contiguous or overlapping ADA complementary paratransit service areas.

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

GRTA was provided with a draft copy of the report for review and response. A copy of the correspondence received from GRTA on December 16, 2011, documenting their response to the draft report, is included as Attachment A.

2 Overview

This review focused primarily on compliance with the ADA complementary paratransit capacity constraints requirements of the DOT ADA regulations. The regulations identify several types of capacity constraints. These include “wait-listing” trips, having caps on the number of trips provided, and recurring patterns or practices that result in a significant number of trip denials or missed trips, untimely pickups, or excessively long trips. Capacity constraints also include other operating policies or practices that tend to significantly limit the amount of service to persons who are ADA complementary paratransit eligible.

The review focused on observations and findings in the following areas to assess each potential capacity constraints:

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

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

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

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

2.1 Pre-Review

The FTA Office of Civil Rights sent a notification letter to GRTA’s Interim Executive Director Joseph C. Manibusan on December 22, 2009, requesting dates for the review and information needed by the review team that should be sent in advance. The notification letter is provided as Attachment B. The FTA on-site review also included an ADA review of Lift Reliability and Maintenance.

The review team examined key service information prior to the on-site review based on the information received from GRTA. This information included:

- A description of how GRTA’s ADA complementary paratransit service is structured
- Public information describing GRTA’s ADA complementary paratransit service
- GRTA’s standards for on-time performance, trip denials, travel times, and telephone service, which were contained in a January 11, 2010, correspondence from GRTA to FTA

As requested by FTA, GRTA made additional information available during the on-site review. This information included:

- Copies of completed driver manifests for recent months
- 36 months of service data, including the number of trips requested
- Records of recent consumer input and complaints related to capacity issues: trip denials, on-time performance, travel time, and telephone access
- Procedures for passenger service comments (reporting complaints and other incidents)
- A listing of vehicles in the GRTA fleet
- A listing of ADA paratransit employees and their starting dates
- Capital and operating budgets and cost data

In addition, the review team contacted several riders, disability advocates, and disability agency representatives to get input on their recent experiences with GRTA's ADA complementary paratransit service.

2.2 On-Site Review

An on-site review of the ADA complementary paratransit service took place from February 9–12, 2010. The review began with an opening conference, held at 9 a.m. on Tuesday, February 9, 2010, at the GRTA offices at 212 Aspinall Boulevard in Hagatna, Guam. The following people attended the meeting:

Joseph Manibusan	GRTA Interim Executive Director
Travis Kloppenburg	Kloppenburg Enterprises (KEI) (contractor to GRTA)
Susan Clark	FTA Office of Civil Rights (by telephone)
David Chia	Planners Collaborative (team leader)
Jim Purdy	Planners Collaborative
Rosemary Gerty	TranSystems

Ms. Clark opened the meeting by thanking GRTA 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 GRTA operations. She also invited GRTA to contact her directly should they have any questions or concerns about the review. Ms. Clark noted that the main purpose of the review was to ensure compliance with requirements of the ADA. She also noted that the review team had significant experience with ADA complementary paratransit operations and encouraged GRTA to utilize the review team for technical assistance.

Ms. Clark noted that FTA sees the compliance reviews not just as a way to assess GRTA's operation of services, but as an opportunity to determine if GRTA has the resources and assistance it needs. She explained that preliminary findings and an opportunity to respond would be provided at a closing meeting on Friday, February 12, 2010. She encouraged GRTA to ask questions about the preliminary findings as well as possible approaches for addressing any issues that might be identified.

Mr. Chia of Planners Collaborative 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 as Attachment C.

Following the opening conference, the review team met with GRTA and KEI to discuss the information sent in advance as well as the information and material that was available on site. They also discussed KEI policies and procedures.

For the remainder of Tuesday morning, the review team discussed the process in place at GRTA to record and respond to consumer input and concerns and requested consumer input from recent months. The review team discussed the eligibility process with GRTA and gathered eligibility files for examination. The review team also gathered information about the GRTA resources devoted toward ADA paratransit service. In the afternoon, the review team moved to the KEI facility. They observed reservations calls and began reviewing operations data and met with the driver trainer at the University of Guam.

On Wednesday, the review team continued its observations of the trip reservations and scheduling process and dispatching at KEI. The review team collected and analyzed information about the telephone system and performance, on-time performance, and trip lengths. During the late morning and early afternoon, the review team visited the facility of KEI's two joint venture partners to review operations and fleet data and to interview drivers. In the afternoon, review of eligibility files and interviews with GRTA on the eligibility determination process continued at the GRTA office.

On Thursday, the review team continued observations of dispatching. The team also continued its examination of on-time performance, on-board travel times, and eligibility determination records. The review team examined long ADA paratransit trips and compared on-board travel times with those on the fixed route service. The review team interviewed GRTA staff regarding resources, budgeting, and staffing. In addition, the review team interviewed the scheduler/dispatcher.

On Friday, 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 GRTA office. The following persons attended the conference:

Joseph Manibusan	GRTA Interim Executive Director
Ginger Porter	GRTA Board Member
Travis Kloppenburg	Kloppenburg Enterprises
Susan Clark	FTA Office of Civil Rights (by telephone)
David Chia	Planners Collaborative
Jim Purdy	Planners Collaborative
Rosemary Gerty	TranSystems

Ms. Clark opened the exit conference by thanking GRTA and KEI for their cooperation in the review. She said she hoped that the review had not caused any disruptions for GRTA and invited them to contact her if they had any concerns. Ms. Clark reviewed the goals of the review—to assess compliance and also to provide technical assistance on ADA complementary paratransit services. She noted that:

- A report would be drafted and provided to GRTA for review and comment.
- Once FTA transmitted the draft report to GRTA, it would be subject to release in response to Freedom of Information Act (FOIA) requests.

- GRTA would have 30 days to review the draft and provide comments, and the comments would be incorporated into a final report. The final report would be posted on FTA's website.
- If there were findings that require action, GRTA would be asked to propose corrective actions and a timetable for making required changes.
- Quarterly progress reports would then be prepared by GRTA and reviewed by FTA until all findings are addressed.

Ms. Clark noted that the draft and final reports would include both findings and recommendations. She explained that GRTA would be required to address any deficient findings, while the recommendations would be presented only for GRTA's consideration as possible ways to address the findings. Ms. Clark encouraged GRTA to begin addressing findings noted during the on-site review while it awaited the draft and final reports. She also invited GRTA to contact FTA or the review team for technical assistance over the next several months if they decided to move ahead with corrective actions.

The review team also thanked the GRTA and KEI for the cooperation they had 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
- Other operational policies and practices
- Resources (vehicles, manpower, and financial resources)

3 Background

Guam Regional Transit Authority (GRTA) was formed in March 2009 as a successor to the Division of Transportation Services in the territorial government's Department of Administration. GRTA is now the FTA grantee and provides essentially the same transportation services with the same personnel and contractor agreement. The few differences occasioned by the formation of the Authority are noted in this report where relevant.

GRTA serves the entire U. S. Territory of Guam, an island of approximately 209 square miles with a population projected by the U.S. Census Bureau to be approximately 178,000 in 2009.

At the time of the on-site review, the seven seats of the GRTA Board of Directors were in the process of being filled. Board members serve 4-year terms. Members of the Mayor's Council of Guam select two members and the Governor of Guam appoints five members. Two of the Governor's appointments are selected from a list of two transit riders and two advocates for people with disabilities provided by the other five Directors. The Board had four members at the time of the on-site review, which exceeded the number required for a quorum, and the last three members were expected to be appointed in 2010.

The GRTA service population is the same as that of the island. Fixed route ridership was 146,930 in FY 2009, an average of 2,826 per week. During the same period, ridership of the demand-responsive service (described below) was 133,427, and ADA paratransit ridership was 37,181.

3.1 Description of Fixed Route and Demand-Responsive Services

GRTA operates four fixed routes known as Red 1, Blue 1, Blue 2, and Express on Monday to Saturday from 5:30 a.m. to 7:30 or 8:30 p.m., depending on the route. There is a break in service for all routes from Noon to 1:30 p.m. Two routes operate every 60 minutes and two others every 120 minutes. The routes converge at a transfer point in Chamorro Village in Hagatna.

Six general public demand-responsive routes provide same-day service in response to rider phone calls. GRTA refers to this service as "Response" (Red 2, Green 1, Green 2, Gray 1, Gray 2, and Gray 3), which operates during the same general hours as the fixed routes. Green 1 makes a number of fixed route stops before becoming a demand-responsive route. The demand-responsive routes each cover a zone of the island and transport riders to and from fixed route bus stops; origin to destination service is provided only within the coverage zone of each route. Demand-responsive service is not provided on Sundays.

Transit service on Sundays comprises the Red 1, Blue 1, and Blue 2 routes plus a Gray 4 route that runs instead of the Gray 1, 2, and 3 demand-responsive routes. Sunday hours of service are 7:30 a.m. to 6:30 p.m., with a break in service from Noon to 1:30 p.m.

Figure 1 presents the GRTA Route Map for fixed route and demand-responsive service.

The fare for a one-way trip is \$1. There is also a daily pass available for \$3.

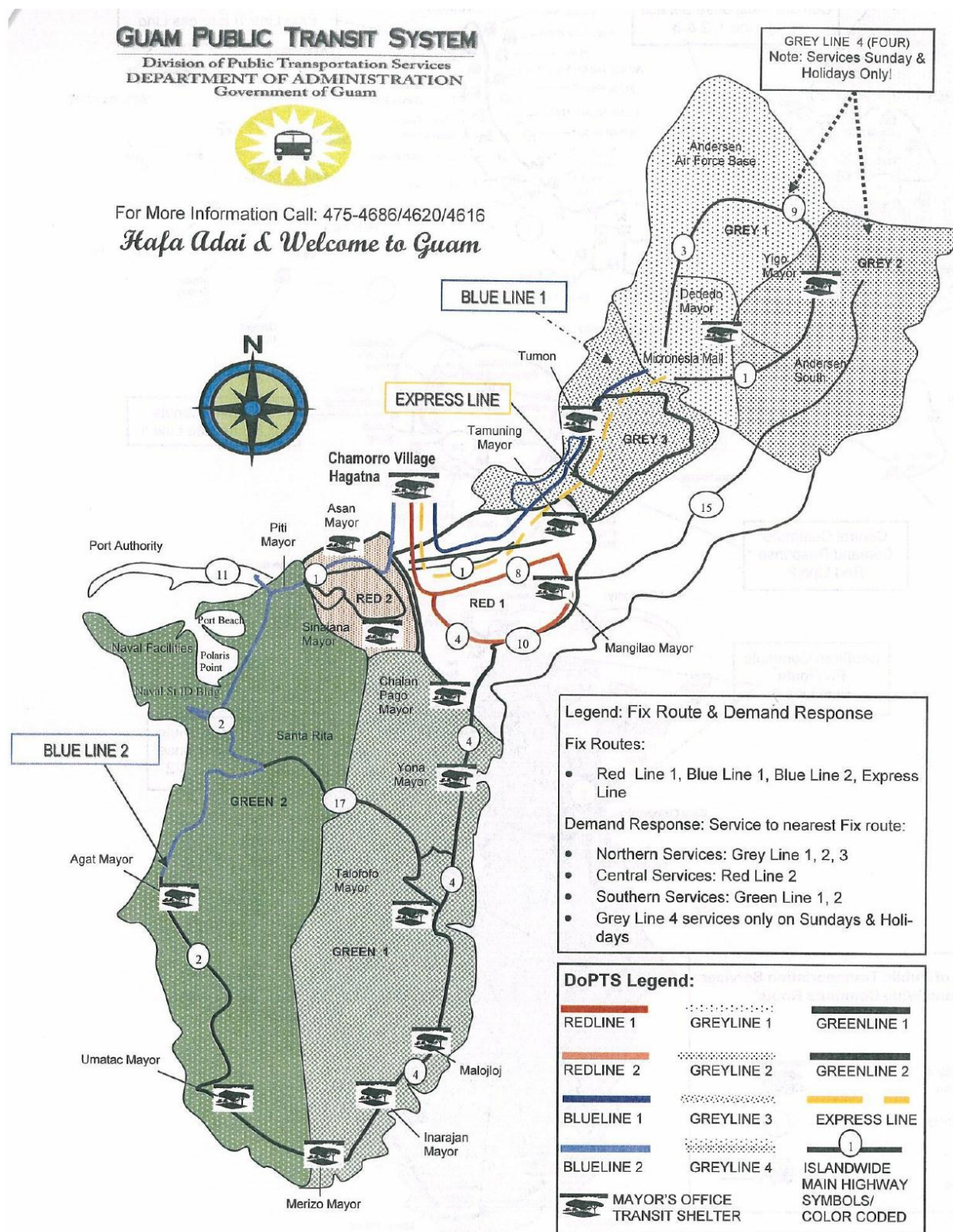


Figure 1 – GRTA Route Map

All GRTA service is provided under contract by a joint venture led by Kloppenberg Enterprises, Inc. (KEI) together with Guam Sanko Transportation (GST) and Micronesia Hospitality, Inc.

(MHI). All three companies provide commercial tourism transportation services that comprise a majority of their respective businesses. At the time of the on-site review, GST and MHI recently merged and were in the process of integrating their staffs. All equipment and personnel were located at GST's bus facility. Due to recent litigation as well as the formation of GRTA, all transit services were being contracted through monthly purchase orders with the KEI joint venture.

The absence of a longer-term contract discourages both GRTA and the contractors to make long-range plans and investments. The Interim Executive Director expected the new Board of Directors to issue a request for proposals for a long-term contract sometime in 2010.

GRTA's website www.grta.guam.gov includes a telephone number that can be used for complaints and inquiries, but no e-mail address. Construction of the website was in progress at the time of review and it provided general operating hours but no route maps or other information for transit and ADA paratransit riders.

3.2 Description of ADA Complementary Paratransit Service

According to the Paratransit Rider's Guide, "Paratransit service is an island wide transportation service for individuals with disabilities who are not able to fully utilize the Guam public transit system, fixed route and demand-response services."

Type of Service

GRTA's written policies state "operators are not allowed to assist passengers from the door of their point of origin to the entry of their destination" (Rider's Guide). However, the GRTA Interim Executive Director noted that the actual practice is more flexible than stated in the Rider's Guide. Furthermore, driver interviews indicated that they provide assistance beyond the curb if needed or requested by the passenger.

Service Area

According to the Riders' Guide, GRTA's paratransit service area encompasses the entire island.

Response Time

Reservations are accepted 1–14 days in advance "during normal business hours" (Rider's Guide). As discussed further in Chapter 7 of this report, reservationists are available to take trip requests 7 days a week from 8 a.m. to 5 p.m.

Days and Hours of Service

ADA paratransit service is available on Monday to Saturday from 5:30 a.m. to 7:30 p.m. (last drop-off) and Sundays and holidays from 7:30 a.m. to 5:30 p.m. The exception to these hours is that, similar to the fixed route and general public demand-responsive services, there is a midday break from 12:30–1:30 p.m.

Fares

The fare for a one-way paratransit trip is 35 cents. Multi-trip discounts are available for daily, weekly, monthly, and annual passes.

Trip Purposes

According to the Rider’s Guide, GRTA’s policy is to arrange trips on a first-come first-served basis with no prioritization.

Service Design

As with GRTA’s fixed route and demand-responsive service, ADA paratransit has been provided under contract by a joint venture led by KEI together with GST and MHI. GRTA (and its predecessor, the Guam Mass Transit Authority GMTA) has been issuing monthly purchase orders seeking vendors to provide all three transit services. The contractor provides all staff, vehicles and other equipment, and facilities to provide ADA complementary paratransit service. GRTA reimburses the contractor per vehicle hour operated.

Eligibility Determination

GRTA performs all aspects of eligibility determination with their own staff.

3.3 ADA Complementary Paratransit Performance Policies and Standards

Denials

GRTA stated in material sent to the review team prior to the on-site review that “Currently there is no set level or percentage of acceptable trip denials; our goal is 100% service.” GRTA also stated that it had no recent ADA paratransit denials.

Trip Cancellations and No-Shows

According to the Riders Guide, riders are to call 1 hour prior to the scheduled pickup time in order to cancel a trip. Trips cancelled less than 1 hour in advance are considered no-shows.

Missed Trips

GRTA does not have a definition or standard for a trip missed by its carriers.

Travel Time

Based upon material GRTA sent to the review team prior to the on-site review (pre-review materials), GRTA’s travel time standard is that an ADA paratransit trip should not take longer than if the rider utilized fixed routes and other services in the system for the same pickup and destination points on the same day/time.

Telephone Standards

According to the pre-review materials, GRTA did not have telephone call-handling standards at the time of the on-site review. GRTA’s goal is to answer every incoming call and to handle the call as quickly and thoroughly as possible.

3.4 Consumer Input

FTA Complaints and Recent Service Issues

An ADA paratransit rider filed a complaint in June 2004 (FTA Complaint Number 04-0171) alleging instances of unequal treatment under the Americans with Disabilities Act by the current contractor, KEI, and associated firms. The complaint addressed insensitive questions asked by ADA paratransit dispatchers, use of inaccessible vehicles for ADA paratransit service, and assignment of drivers who were not appropriately trained in wheelchair securement. Correspondence between the FTA and the Guam Department of Administration (DOA) addressed these allegations. DOA stated that part of the problem was due to the transition to the new contractor in January 2004, that the incidents were not intentional, and that DOA had grown in knowledge and experience since that time and was continuing to strive toward compliance with the applicable laws and regulations.

A November 2006 letter from the complainant to FTA stated that many of the original deficiencies cited in the complaint had not been rectified and that there had been a persistent pattern of non-compliance with the ADA such as: failure to provide ADA paratransit trips the next day, failure to schedule trips 14 days in advance, failure to provide timely service, operation of vehicles without lifts or with inoperative lifts, excessively long ADA paratransit rides, and failure to ensure the proper training of drivers in wheelchair securement and lift operation. The letter also stated:

I believe the government also has a duty to log in complaints, which provide a basis to document repetitive situations, an element I recently found missing. I have filed concerns [to the Guam Division of Transit about another matter] and now find that my documentation is the only existing record, with none having been retained by the transit division.

This complaint is relevant to the review of Guam's ADA paratransit service both in terms of allegations of capacity constraints, poor training of drivers, and use of inaccessible vehicles, as well as the alleged failure to maintain records of complaints.

Consumer Input

Prior to the on-site review, GRTA referred the review team to the University of Guam's Center for Excellence in Developmental Disabilities Education, Research and Service (CEDDERS). A senior staff member who provides advocacy training to members of the disability community on Guam (as well as bus driver training) provided contact information for GRTA riders with disabilities who might agree to be interviewed as well as other organizations such as dialysis centers that could assist in identifying potential interviewees. The review team conducted telephone interviews with six riders who use ADA paratransit as well as a social worker at a dialysis center.

The questions used in the interviews are presented in Attachment D. Each interviewee was asked for input on various aspects of the service, including:

- 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
- Vehicle condition

The review team also asked for any other input on the service not covered by the specific questions. Please refer to Chapters 5–10 for summaries of the consumer input related to the service issues covered in the respective sections.

Consumer Input on File at GRTA

GRTA’s procedures for receiving and responding to consumer input and complaints are described in Chapter 5.

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. GRTA's compliance with DOT ADA regulations origin-to-destination requirements were inconsistent. A majority of drivers interviewed and GRTA's Interim Executive Director told the review team that GRTA provides assistance to riders beyond the curb as needed. However, written policy (as contained in the Rider's Guide) for GRTA states "operators are not allowed to assist passengers from the door of their point of origin to the entry of their destination."
2. GRTA paratransit service did not operate during all hours when fixed route service is available. Paratransit service ended at 7:30 p.m. on Monday through Saturday, while fixed route service on all routes operated until 8 p.m. Paratransit service ended at 5:30 p.m. on Sundays, while fixed route service operated past 6:00 p.m.
3. GRTA has a complaint form, but its staff is not consistent in recording complaints received via telephone onto the form.
4. GRTA receives complaints via telephone, fax, from their contractors. Riders can also e-mail complaints—though GRTA does not publicize the e-mail address, so in practice riders did not e-mail complaints.

4.2 ADA Complementary Paratransit Eligibility Process

1. GRTA does not conduct in-person or functional assessments. Although the application form provides good information, the medical certification is highly detailed and requires a licensed physician to complete the medical certification. The types of questions that are asked are more typically part of an in-person functional assessment process and may not be answered accurately by a medical professional (e.g., questions about travel skills).
2. The eligibility determination letter for temporary eligibility does not provide the reasons for temporary eligibility. The letter does not describe how to file an appeal if the applicant disagrees with the temporary eligibility determination.
3. The eligibility determination letter (or ID card) for conditional eligibility does not specify the conditions. In addition, it does not describe how to file an appeal if the applicant disagrees with the conditional eligibility determination.
4. The appeals brochure provides an overview of the right to appeal, but does not contain detailed directions concerning the process for filing an appeal, and does not appear to acknowledge that trips missed due to circumstances beyond the rider's control cannot be used as a basis for determining the existence of a pattern or practice.

5. GRTA and KEI do not have a formal policy for what may constitute an excusable no-show.
6. At the time of the on-site review, if a rider failed to appear for an initial trip, GRTA's policy required the rider to confirm all subsequent trips for the day; otherwise, they were cancelled. This is inconsistent with DOT's position that regards each trip separately, and leaves it to the rider to cancel any subsequent trips that he or she does not intend or will be unable to take.
7. GRTA's policy for no-show suspension is based on a small, absolute number of no-shows, which may not be sufficient to constitute a pattern or practice sufficient to warrant suspension, particularly for frequent riders.
8. GRTA has not implemented its no-show policy. However, the policy for a suspension period of 180 days for the second offense could be considered excessive.
9. GRTA's policy regarding prohibited acts, misconduct, and suspension of service states "services may be suspended to a cardholder for a period not longer than 365 days at the discretion of the Director or his or her designee." Section 37.5(h) of the DOT regulations states "It is not discrimination under this part for an entity to refuse to provide service to an individual with disabilities because that individual engages in violent, seriously disruptive, or illegal conduct." However, suspending a passenger for 365 days for misconduct or prohibited acts, without considering mitigating circumstance or the degree of severity of the infraction, could be considered excessive. In addition, the brochure does not describe the right to appeal such a suspension.

4.3 Telephone Access

1. GRTA has no standards for its telephone service.
2. Neither GRTA nor KEI, which accepts the calls on behalf of GRTA for ADA paratransit service, measures or monitors call volumes, hold times, or calls sent to voicemail.
3. Neither GRTA nor KEI have a TDD line. For individuals who use a TDD, there is no public information on how to contact GRTA or KEI for ADA paratransit service.
4. KEI accepts trips requests from 8 a.m. to 5 p.m. 7 days a week. However, riders cannot make trip requests on Christmas or New Year's Day, even though GRTA provides ADA paratransit service on the following days.

4.4 Trip Reservations and Scheduling

1. At the time of the on-site review, GRTA did not have any written policies regarding their trip denial standard, standby status, or waiting lists.
2. In general, the dispatchers were courteous and professional with riders. However, they did not confirm all information by repeating the trip details back to the rider or ensure that the rider was aware of the pickup window.

4.5 Service Performance

1. GRTA regards a trip canceled less than 1 hour before the scheduled pickup time as functionally equivalent to a no-show. It does not have any other written policies concerning no-shows.

2. GRTA does not have a definition or standard for a carrier–missed trip. As a result, GRTA track missed trips. Contractors do not have a contractual incentive to avoid missed trips.
3. Dispatchers reported that additional demand for service on weekdays is leading to vehicle schedules with more trips, resulting in runs that are more difficult to operate on time. The ability to schedule trips can be somewhat of a challenge because there is no GRTA service from 12–1:30 p.m. As a result, it can be difficult to schedule late-morning and early-afternoon pickups. In addition, Saturday demand has been increasing.
4. KEI handles on-the-road dispatching for all three services using two-way radios. Drivers are supposed to call to record pickups and drop-offs with a dispatcher. However, the KEI dispatchers indicated that this is not enforced because the dispatchers are actively managing both paratransit and general demand-response travel requests while simultaneously handling radio traffic.
5. The dispatchers noted that they sometimes find that riders’ telephone numbers and secondary contact information is out of date. This lack of timely information can be important when a dispatcher is trying to contact a rider to avoid a no-show.
6. None of the 16 drivers interviewed knew the correct pickup window.
7. Drivers had an inconsistent understanding of GRTA’s policy for providing assistance to riders. Two drivers (both KEI) said they did not help beyond the curb; one of them indicated that they were not authorized to help.
8. Neither GRTA nor KEI monitor or measure on-time performance for pickups.
9. Drivers are not required to record actual pickup or drop-off times. In a two-week sample of driver manifests, 28 of 122 (23 percent) had actual pickup and/or drop-off times.
10. Based on the limited set of manifests with data from the sample period, GRTA pickups were on time or early for 78.6 percent of trips. If one were to compute pickup performance using a window of +15 minutes (more typical for ADA paratransit), then the performance for the sample set of trips would improve slightly, to 81.3 percent on time or early. This level of performance is well below the standard used by most paratransit systems.
11. GRTA does not have a definition for an on-time drop-off (appointment time). As a result, GRTA has no performance standard for on-time drop-offs.
12. Neither GRTA nor KEI monitor or measure on-time performance for drop-offs. GRTA does not require KEI call-takers to record appointment times (when requested by riders), so this information is not available to schedulers, dispatchers, or drivers. As a result, it is not possible to measure on-time performance for drop-offs.
13. GRTA does not have a specific standard for on-board travel time.
14. Drivers do not routinely record arrival and departure times for pickups or drop-offs, making it difficult to determine on-board travel times, which are typically calculated based on the departure time for the pickup to the arrival time for the drop-off.

4.6 Resources

1. At the time of the on-site review, GRTA was not monitoring ADA complementary paratransit service other than reviewing invoices and responding to complaints. There were no regular field observations of service or visits to the contractor facilities.
2. Neither GRTA nor KEI have a means of monitoring telephone performance.

5 ADA Complementary Paratransit Service Criteria

This chapter presents information about the compliance of GRTA’s ADA complementary paratransit service policies with the regulatory criteria for each of the following areas:

- Type of service
- Service area and days and hours of operation
- Fares
- Trip purposes
- Coordination with adjoining transit systems

This chapter also examines the GRTA’s process when receiving, investigating, and responding to comments and complaints from ADA complementary paratransit service riders.

5.1 Consumer Input

In the FTA complaint (Number 04-0171), the complainant claimed that the predecessor agency to GRTA did not maintain a record of her written complaints to the agency. The complainant “filed concerns [to the Guam Division of Transit about another matter] and now find that my documentation is the only existing record, with none having been retained by the transit division.”

The review team conducted a telephone interview with a social worker from a dialysis center that has many clients who used ADA paratransit. The social worker emphasized that a problem for several of his clients is the difficulty in getting from their residence to the ADA paratransit vehicles. In many cases drivers are unable to stop close to the rider’s door because of narrow streets and obstructed driveways. This problem is compounded by the relatively large size of some of the ADA paratransit vehicles.

Three riders interviewed by phone said that GRTA and KEI were responsive to complaints filed, particularly in recent years, while the other three said that they do not usually receive a response regarding the resolution of the complaint.

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. If the base service is curb-to-curb, in order to meet this origin-to destination requirement service may need to be provided to some individuals, or at some locations, in a way that goes beyond curb-to-curb service. 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.

A September 1, 2005, memo approved by US DOT’s Disability Law Coordinating Council recognizes that situations exist in which door-to-door service is not advisable. The memo states:

Drivers would not have to provide services that exceed “door-to-door” service (e.g., go beyond the doorway into a building to assist a passenger). Nor would drivers, for lengthy periods of time, have to leave their vehicles unattended or lose the ability to keep their vehicles under visual observation, or take actions that would be clearly unsafe (e.g., back

a vehicle down a narrow alley in specific circumstances that would present a direct threat to safety).

The Guam legislature enacted rules and regulations for the GMTA (predecessor to the GRTA) in Public Law 26–57 (February 2006). Section 3.13 states that “Paratransit is not a door-to-door service, nor is any other GMTA public transportation service.” Section 3.14 (“Curb-to-Curb service”) states “Transportation service provided for paratransit service shall be to and from accessible pick-up and drop off points, which are curbside adjacent to public streets, roadways, or any appropriate off-street location.” In addition, the printed Paratransit Rider’s Guide states the “operators are not allowed to assist passengers from the door of their point of origin to the entry of their destination.” However, the GRTA’s Interim Executive Director informed the review team that the actual practice is more flexible than stated in these documents. Furthermore, 13 of the 17 drivers interviewed by the review team said that they provide assistance beyond the curb if needed or requested by the rider.

Providing a means for the rider to request this assistance beyond the curb may include asking the rider for advance notice of this need during trip reservation. GRTA’s public information materials, including the Rider’s Guide, do not inform riders of the availability of assistance beyond the curb when needed. GRTA’s current policy does not directly inform drivers of the assistance-when-needed policy.

One issue specific to GRTA’s service area is that there are many narrow streets and driveways that may not be easily or safely navigated by the ADA paratransit vehicles, some of which are 30-foot buses. KEI currently visits the residences of riders who have applied for eligibility to assess vehicle access and determine the appropriate point for boarding and alighting. Smaller vehicles would be helpful in this regard, but there would still be many situations in which it would be difficult to bring the vehicle close to the door of a rider’s origin or destination point.

In summary, GRTA does not fully comply with the origin-to-destination requirement, and it should provide explicit guidance to its riders and drivers on how assistance beyond the curb should be requested and provided. In doing so, GRTA should make every reasonable effort to provide this assistance.

5.3 Service Area

Section 37.131(a) of the DOT ADA regulations requires a transit system 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 system’s fixed route, unless the public transit system does not have the legal authority to operate in those areas.

GRTA ADA paratransit serves the entire island of Guam, regardless of distance from fixed route service. It therefore is in compliance with this portion of the regulation.

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. This 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. 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.

The Rider’s Guide states GRTA’s hours of paratransit service as “from 5:30 a.m. to 7:30 p.m. (last drop-off), Monday–Saturday, and 7:30 a.m. to 5:30 p.m. (last drop-off on Sundays and holidays.” There is no service from 12:30–1:30 p.m.

Table 5.1 presents the start and end times for the four GRTA fixed routes

Table 5.1 – GRTA Fixed Route Start and End Times

Route	Monday–Saturday		Sunday	
	Start (a.m.)	End (p.m.)	Start (a.m.)	End (p.m.)
Blue 1	5:30	8:28	7:30	6:28
Red 1	5:30	8:22	7:30	6:29
Express	5:30	8:00	—	—
Grey 1	—	—	7:30	6:11

At the time of the on-site review, the ADA paratransit hours did not fully cover the GRTA fixed route schedules because the fixed route services run for approximately 1 hour after the final ADA paratransit drop-off. To be in compliance with DOT ADA regulations, ADA complementary paratransit riders must be able to schedule a trip with a drop-off at the same time as the fixed route buses run: roughly 8:30 p.m. on Monday to Saturday, and roughly 6:30 p.m. on Sundays.

5.5 Fares

Section 37.131(c) of the DOT ADA regulations requires that paratransit fares be no more than double the fixed route fare for an equivalent trip. 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 permitted to travel at no charge. Finally, a transit system may charge a higher fare to a social service organization or other organization for agency trips (guaranteed trips). The GRTA fixed route base fare is \$1.00. The ADA paratransit fare is 35 cents, which is well within the allowable limit. PCAs are not charged a fare. Therefore, GRTA ADA paratransit fares were in compliance at the time of the on-site review.

5.6 Trip Purpose

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

GRTA does not restrict or prioritize trips by trip purpose and therefore complies with the regulation. According to the Rider’s Guide, “Trips are not scheduled according to priority, the ADA does not allow trip purpose priorities. Transportation is arranged on a first come basis.”

During observations of trip reservations and scheduling, review team members did not observe call-takers prioritizing trip requests base on trip purpose.

5.7 Coordination with Adjacent Service Providers

As an outgrowth of the coordination requirements in Section 37.139(g) of the DOT ADA regulations, transit systems are required to coordinate with transit systems that have overlapping or contiguous service areas for paratransit riders who want to travel between service areas.

GRTA serves the entire island of Guam and there are no other transit systems with or without overlapping or contiguous service areas.

5.8 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 (49 CFR 27.13(b) and 27.121(b)). While requirements to respond to complainants are not included in the DOT ADA regulations, it is a common and effective practice for a transit provider to respond to complainants and for transit providers to investigate allegations to ensure that all DOT ADA requirements are being met.

Complaint Policies and Procedures

GRTA receives complaints directly from the public, and its contractors forward any complaints that they may receive. Most complaints come directly to GRTA via telephone; others come via fax, e-mail (though the address is not publicized), or from the contractors. GRTA takes notes of phone calls and in many, but not all instances, completes a complaint form (See Attachment E). Written complaints are also entered onto a complaint form. Complaints are sent to the lead contractor, KEI, requesting action to further investigate and resolve the complaint.

KEI investigates directly with the involved employee (either KEI or another contractor). KEI then informs GRTA as to how the firm addressed the complaint. Resolution may be specific action to counsel or discipline a driver who was at fault, or, if the contractor's operations manager believes the driver was not at fault, the response may simply be to document the driver's account of the incident.

GRTA stated that the majority of complaints are resolved within the 3-day limit prescribed by the applicable operating regulations of the Government of Guam (Public Law 26-57, Section 9) and that they generally call the rider back if he or she had asked to be informed about the resolution of their complaint.

An interview with an administrative employee of KEI confirmed the details of the complaint process and added that its dispatcher calls the complainant to report on the resolution of the complaint.

The completed complaint forms and handwritten notes of phone conversations are placed in a three-ring binder in chronological order. Dividers separate the months, and a one- or two-page synopsis of complaints is prepared and presented to the GRTA Board of Directors as part of their regular monthly meeting. The synopsis distinguishes between informal complaints that were received by telephone and formal complaints that were received in writing.

The review team also examined complaint files at the offices of the contractors. All of the paratransit-related complaints in the contractors' files were also in GRTA's complaint book. The only complaint that was not also in GRTA's complaint book was from a rider who said she'd been passed up by an MHI-operated fixed route bus.

The GRTA website did not have any content inviting rider comments and complaints. It did display a phone number and fax number that the public can use to contact GRTA. A mailing address, but not an e-mail address, was also provided.

The review team verified that complaints were being kept on file for at least the past 3 years; and examined the complaint records for the 12 months prior to the review.

Analysis of GRTA Complaints

GRTA does not separate complaints regarding ADA paratransit, demand-response, and fixed route service. The review team identified 21 separate complaint filings in the 12 months prior to the review, some of which contained more than one type of complaint; e.g., "driver did not secure wheelchair properly and was also rude" are counted as one filing with two separate complaints. Some of these filings were made by telephone and are documented only in handwritten notes. The 21 filings included 19 concerning ADA paratransit service, one concerning fixed route service, and one concerning sexual harassment on a demand-response bus.

For 13 of the 21 filings (62 percent), the resolution of the complaint was documented in the record. For the other eight filings, no documentation was included so that any resolution of the complaint could not be determined. In addition, few of the records documented a call to the complainant explaining how the complaint had been resolved.

The review team analyzed the 19 paratransit complaint filings by topic. Because some complaints included multiple issues, the total number of paratransit-related complaints actually totaled 25. Table 5.2 shows these complaints by type.

Of particular concern were three complaints (categorized as "Capacity") stating that it was not possible to reserve a trip at the desired time and date, and three complaints categorized as "Safety-driver" and "Injury" describing separate incidents in which two wheelchairs overturned and another almost overturned owing to alleged improper securement. Three complaints categorized as "Safety-van" described a wet floor surface, an inoperative horn, and a non-functional securement strap.

Table 5.2 – Paratransit Complaints, February 2009 to January 2010

Type of Complaint	Number By Type	Number By Subtype
Capacity	3	
Driver	3	
Driver behavior		1
Driver rude/insensitive		1
Driving		1
Drop-off wrong location	1	
Injury	3	
Injury w/c overturned		2
Injury other		1
Long trip	1	
Passenger misconduct	1	
Pickup late	1	
Pickup missed	2	
Reservations	3	
Reservations unavailable		2
Reservations rude/insensitive		1
Safety - driver	3	
Safety - van	3	
Van availability	1	
Total	25	

5.9 Findings

1. GRTA's compliance with DOT ADA regulations origin-to-destination requirements were inconsistent. A majority of drivers interviewed and GRTA's Interim Executive Director told the review team that GRTA provides assistance to riders beyond the curb as needed. However, written policy (as contained in the Rider's Guide) for GRTA states "operators are not allowed to assist passengers from the door of their point of origin to the entry of their destination."
2. GRTA paratransit service did not operate during all hours when fixed route service is available. Paratransit service ended at 7:30 p.m. on Monday through Saturday, while fixed route service on all routes operated until 8 p.m. Paratransit service ended at 5:30 p.m. on Sundays, while fixed route service operated past 6:00 p.m.
3. GRTA has a complaint form, but its staff is not consistent in recording complaints received via telephone onto the form.
4. GRTA receives complaints via telephone, fax, from their contractors. Riders can also e-mail complaints—though GRTA does not publicize the e-mail address, so in practice riders did not e-mail complaints.

5.10 Recommendations

1. GRTA should revise its written policies to allow drivers to provide door-to-door service to riders as needed. GRTA should have KEI and the other contractors train their drivers in this practice.
2. GRTA should expand its hours for paratransit service so that they, at a minimum, are comparable to the hours on its fixed route service.
3. GRTA staff should be consistent in the use of their use of the complaint form in recording complaints.
4. GRTA should publicize the e-mail address that riders can use to submit 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 input about the eligibility determination process through interviews with riders and advocates and a review of consumer input on file at GRTA
- Developed an understanding of the handling and review of applications through an assessment of current eligibility materials and interviews of eligibility determination staff
- Reviewed eligibility determination outcomes for the period of October 2008 to September 2009
- Reviewed the application files of applicants denied ADA complementary paratransit eligibility

6.1 Consumer Input

The 2004 complaint (FTA Complaint Number 04-0171) concerned insensitive questions asked by ADA paratransit dispatchers, use of inaccessible vehicles for ADA paratransit service, and assignment of drivers who were not appropriately trained in wheelchair securement. Eligibility was not mentioned in this complaint.

During telephone interviews, the review team asked riders about the eligibility process, including whether they had had any problems with the eligibility process and whether they had been notified of their eligibility within 21 days of filing a completed application. None of the riders had had difficulty becoming eligible. Two mentioned that they do not understand the need to renew their eligibility, but also said that the recent change to three-year renewals was a great improvement over the previous requirement for annual renewal. One said that it is not always easy to get an appointment for an eligibility interview. All said that notification was generally faster than 21 days. Two mentioned that several years ago there had been some delays in receiving notifications.

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 is available in accessible formats, upon request.

Section 137.125(c) 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) requires that the transit system's determinations of eligibility must be in writing and if applicants are found to be ineligible, the determination must state the specific reasons for the finding. Appendix D to the regulations indicates that these reasons cannot be a simple recital that the person has been found to be able to use fixed route service. Determinations that deny eligibility or limit eligibility also should be accompanied by 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 appeals 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.

Initial Determination Process

GRTA is responsible for all aspects of the eligibility determination process. Once an initial determination is made, KEI reviews the location of the applicant's home to identify any access issues based on road conditions or other factors.

GRTA accepts applications by mail or in person. GRTA helps applicants initiate the process via telephone and then sends them the application via mail to sign and return. Professional verification from a licensed physician is required of all applicants. The application was revised in December 2009 to include a self-assessment of the individual's ability to use public transit.

Attachment F provides a copy of the 36-page application form, which includes a cover letter and instructions. The main application (Parts 1–6) is eight pages. Part 7 (medical certification) includes five assessment form attachments, depending on the type of disability (cognitive, psychiatric, vision, seizure, or physical).

Applicants are asked to complete Parts 1–6 and ask a Guam licensed physician to complete the medical certification section (Part 7). The letter indicates that determinations are to be made within 21 days and, if the applicant has not received a determination during that time, presumptive eligibility will be provided. The letter states that some applicants may be asked to participate in an in-person assessment. It also indicates that if the person is not found eligible, exact reasons will be provided.

In addition to requesting contact information, Part 2 (Application Certification) asks the applicant to check a box on the form next to one of the following statements:

- I can use the Guam Public Transit System (Fixed and Demand-response) to go some places, but in other places I cannot get to or from the bus stop.
- I can use the Guam Public Transit System sometimes, but only if buses are equipped with wheelchair lifts.
- Because of my disability, I can never use the Guam Public Transit System.

Part 7 (Medical Certification) includes forms with detailed questions about the diagnosis, skills, and applicant's ability to use public transit. One of the questions on the form asks if the applicant is a licensed driver—which is not relevant to one's ability to use transit or whether the applicant is eligible for ADA complementary paratransit. The medical certification requires a physician to answer as many as 26 questions, which may take a long time to complete and discourage the physician from responding promptly.

When GRTA receives an application for paratransit, the program administrator notes the date of receipt and later notes the date the determination letter was sent to the applicant. Each application is reviewed for completeness. If there is missing information, the program administrator returns the application requesting the needed information (or calls if the missing information is minor). The 21-day period before an applicant receives presumptive eligibility begins after GRTA receives a completed application.

Beyond the request for medical certification, GRTA does not typically gather information about an applicant's condition. At the time of the on-site review, GRTA did not conduct functional assessments of its applicants or conduct interviews.

GRTA provides information to KEI once an applicant is determined as eligible. Then KEI conducts an assessment to determine whether their vehicles can reach the applicant's residence. Because of GRTA's typically large paratransit vehicles and because many roads are unpaved, certain addresses are inaccessible; sometimes an alternate pickup location is required.

KEI has 5 days to complete its assessment noting whether there is road access and whether it is paved, what type of residence (single family, duplex, or multiple apartments), and whether there is wheelchair access at ground level and whether there is a ramp. If the residence is not accessible, KEI identifies the nearest accessible pickup location; this information is included in the letter confirming eligibility to the applicant. The home assessment is a relatively new process that was still being fine-tuned at the time of the on-site review.

Eligible applicants receive a Paratransit Eligibility Card that includes a photo and unique four-digit ID number. The ID card has the name of the individual, the expiration date, and eligibility type. The reverse side includes the issue date, date of birth, weight, height, hair color, and eye color.

Types of Eligibility Granted

GRTA grants the following types of eligibility:

Unconditional ADA eligibility: Unconditional eligibility is “granted if your disability prevents you from using the Guam Public Transit System for all trips that you might need to make.”

- **Conditional ADA eligibility:** Conditional eligibility is “granted if you can use the Guam Public Transit System buses under certain circumstances, but need GRTA’s Paratransit Service for certain trips.”
- **Temporary ADA eligibility:** this type of eligibility is not discussed in the application or accompanying letter.
- **Visitor Eligibility:** GRTA grants eligibility to visitors with documentation of ADA complementary paratransit eligibility from another jurisdiction for up to 21 days within any 365-day period. GRTA grants presumptive eligibility to visitors without documentation until they have submitted an application to GRTA and GRTA has made an eligibility determination.

Reported Determination Outcomes and Eligibility Determination Letters

The review team analyzed samples of GRTA’s eligibility determination letters (Attachment G), which vary based on the type of eligibility granted. All letters include the name of the applicant, the name of the transit provider, the telephone number for GRTA’s administrative office, and an expiration date for eligibility. The letters do not include the conditions of eligibility or specific reasons for the specific determinations.

The eligibility denial letter (there has only been one in the past few years) contained detailed information about the specific reasons for the denial and included information about how to file an appeal.

The letter granting conditional eligibility indicates that the applicant has been given conditional eligibility and states that the attached card “contains important information regarding your functional capabilities and requirements.” This is not consistent with the actual card, (Attachment H), which only indicates whether a person has conditional eligibility and does not indicate what those conditions are. The sample letter did not contain any information regarding how to file an appeal.

The letter granting unconditional eligibility also asks the individual to sign and return the application form, indicating that the application may have been processed without being signed.

Timeliness of the Process

The review team analyzed processing time for a sample of completed applications for ADA complementary paratransit received by GRTA from 2007–2009 (there are only 377 registrants and the files are kept together). The elapsed time calculated for the analysis is shown in Table 6.1.

Table 6.1 – Processing Time for Sample of ADA Complementary Paratransit Applications

Sample size	20
Average processing time (days)	12.6
Range of processing time (days)	3–36
Applications requiring > 21 days (includes 1 in 2007 and 1 in 2009)	2

Based on the analysis, it appears that GRTA is prompt in its review and processing of applications for ADA complementary paratransit service. Presumptive eligibility was granted for the two instances when the processing time exceeded 21 days.

Appeal Process

GRTA has established a Grievance Review and Appeals Board (GRAB) for individuals who have been denied eligibility, given conditional eligibility, or been given a no-show suspension or service suspension for disruptive behavior. The process for appeals is documented in a brochure (Attachment I). At the time of the on-site review, GRTA was unable to provide the names of current GRAB members, but noted that they represent individuals knowledgeable about the ADA and various disabilities and had been trained by Ginger Porter, GRTA Board Member and Instructor for Disability Studies at the University of Guam.

The appeals brochure provides an overview of the right to appeal, but does not contain detailed directions about the process for filing or how GRTA determines whether or not no-shows were beyond the rider's control—such as when they are sick or hospitalized and unable to cancel. There are also no provisions for disputing a no-show determination that might result from a driver incorrectly designating a missed trip as a no-show.

Recertification

At the time of the on-site review, 377 individuals were certified for ADA complementary paratransit, including 194 people with physical disabilities, 123 with mental illness, 27 with vision impairments or blindness, 16 with developmental disabilities, and 17 with other disabilities. Eligibility is granted for 3 years other than for individuals given temporary eligibility.

From October 2008 to September 2009, GRTA registered 351 individuals, including 44 new applicants given conditional eligibility and 17 given unconditional eligibility. There were also 290 recertifications, of which 208 received conditional, 81 unconditional, and one received temporary eligibility. A total of 201 individuals were registered as traveling with a PCA.

GRTA rarely denies eligibility to anyone applying for the service, with only one denial in the past three years.

In most transit systems conditional eligibility typically comprises less than 50 percent of applicants. However, GRTA grants conditional eligibility to about 76 percent of applicants. At the time of the on-site review, however, GRTA was not enforcing conditional eligibility, meaning that all riders could reserve a trip without any conditions.

6.3 Process Observations and Reviews of Recent Determinations

The review team examined 24 recent applications. All applicants were granted eligibility (13 unconditional and 11 conditional). The letters granting conditional eligibility do not consistently document the conditions. According to GRTA, this is often due to the extent of the information provided in the medical verification portion of the application.

Based on the review of the sample, by relying on self-reporting and medical verification of an applicant's functional ability to use fixed route service, determinations may become dependent upon the wording chosen by the applicant or physician and not on the observations of transit staff.

6.4 No-Show Suspension Policy

Section 37.125(h) of the DOT ADA regulations states that transit systems “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.’” The review team reviewed GRTA's policies procedures and practices regarding no-show suspensions as part of the assessment.

GRTA has established a policy for suspending service to riders for late cancellations and no-shows, and has established the following definitions as outlined in the Rider's Guide:

Cancellations: If the trip is not canceled at least one (1) hour before the scheduled pick-up time the [rider] will be considered a No-Show.

No-Shows: Failing to appear for a scheduled trip without proper cancellation is considered a No-Show.

The Rider's Guide also states the following policies:

Note: If you are a No-Show for your first scheduled pick up, you must confirm with the provider that you will be able to meet your remaining scheduled rides. If you do not confirm your remaining scheduled rides, then those rides will be cancelled.

If you are a No-Show for a second time on the same day, then all of your other trips scheduled for that day will automatically be cancelled. Riders who have repeated No-Shows may be subject to suspension of their paratransit service.

In 2001, FTA determined that in the event of an apparent no-show on the “going” (i.e., initial) trip, subsequent trips scheduled later that day cannot be automatically canceled and transit systems are required to take every step possible to ensure that an assumed no-show is in fact an actual no-show before canceling the return trip.

The No-Show and Late Cancellation Policy brochure states that individuals with no-shows/late cancellations may be suspended from service according to the following guidelines:

A passenger who is a No-Show/Late Cancellation three (3) times in a month may be subject to the suspension of public transit service at the discretion of Department of Administration's Director or his/her designee.

The first such suspension of service shall be for no longer than thirty (30) calendar days.

Suspensions for violations of this rule after the first suspension shall not be for more than one hundred eighty (180) calendar days.

Prior to suspending service to any passenger, one written notice of warning shall be given to the passenger.

The brochure notes that individuals have the right to appeal the decision of suspension by sending a written letter within five working days after the date of the letter of suspension.

In considering whether the number of no-shows truly constitutes a pattern or practice, FTA has encouraged transit systems to look not only at the absolute number of no-shows, but to consider the frequency of no-shows compared to all trips taken by the rider. Three no-shows for someone who travels daily to work and uses the service for other non-work trips represents a different pattern than three no-shows for someone who only occasionally uses the service.

The suspension period of 180 days for the second offense could be considered excessive.

GRTA does not appear to have practices for determining whether or not a no-show is due to circumstances beyond the rider's control, which cannot be used as the basis for suspension of service. For example, if someone is ill first thing in the morning and has an early pickup, it may not have been possible to contact GRTA more than an hour in advance of the scheduled pickup time (and regardless, a no-show under such circumstances could not be counted toward determining whether a pattern or practice existed).

As discussed further in Chapter 9, at the time of the on-site review, dispatchers at KEI did not have computer or paper access to a rider's address and telephone number. As a result, no means were available to contact a rider when the driver arrives at the pickup location but the rider does not appear. GRTA, which maintains the certification database, was working on sharing this information with KEI. At the time of the on-site review, GRTA had not been enforcing the no-show policy.

GRTA also has a policy regarding prohibited acts, misconduct, and suspension of service, which states "services may be suspended to a cardholder for a period not longer than 365 days at the discretion of the Director or his or her designee." Section 37.5(h) of the DOT regulations states "It is not discrimination under this part for an entity to refuse to provide service to an individual with disabilities because that individual engages in violent, seriously disruptive, or illegal conduct." However, suspending a passenger for 365 days for misconduct or prohibited acts, without considering mitigating circumstances or the degree of severity of the infraction, could be considered excessive. In addition, the brochure does not describe the right to appeal such a suspension.

6.5 Findings

1. GRTA does not conduct in-person or functional assessments. Although the application form provides good information, the medical certification is highly detailed and requires a licensed physician to complete the medical certification. The types of questions that are asked are more typically part of an in-person functional assessment process and may not be answered accurately by a medical professional (e.g., questions about travel skills).
2. The eligibility determination letter for temporary eligibility does not provide the reasons for temporary eligibility. The letter does not describe how to file an appeal if the applicant disagrees with the temporary eligibility determination.

3. The eligibility determination letter (or ID card) for conditional eligibility does not specify the conditions. In addition, it does not describe how to file an appeal if the applicant disagrees with the conditional eligibility determination.
4. The appeals brochure provides an overview of the right to appeal, but does not contain detailed directions concerning the process for filing an appeal, and does not appear to acknowledge that trips missed due to circumstances beyond the rider's control cannot be used as a basis for determining the existence of a pattern or practice.
5. GRTA and KEI do not have a formal policy for what may constitute an excusable no-show.
6. At the time of the on-site review, if a rider failed to appear for an initial trip, GRTA's policy required the rider to confirm all subsequent trips for the day; otherwise, they were cancelled. This is inconsistent with DOT's position that regards each trip separately, and leaves it to the rider to cancel any subsequent trips that he or she does not intend or will be unable to take.
7. GRTA's policy for no-show suspension is based on a small, absolute number of no-shows, which may not be sufficient to constitute a pattern or practice sufficient to warrant suspension, particularly for frequent riders.
8. GRTA has not implemented its no-show policy. However, the policy for a suspension period of 180 days for the second offense could be considered excessive.
9. GRTA's policy regarding prohibited acts, misconduct, and suspension of service states "services may be suspended to a cardholder for a period not longer than 365 days at the discretion of the Director or his or her designee." Section 35(h) of the DOT regulations states "It is not discrimination under this part for an entity to refuse to provide service to an individual with disabilities because that individual engages in violent, seriously disruptive, or illegal conduct." However, suspending a passenger for 365 days for misconduct or prohibited acts, without considering mitigating circumstance or the degree of severity of the infraction, could be considered excessive. In addition, the brochure does not describe the right to appeal such a suspension.

6.6 Recommendations

1. GRTA should modify its medical certification process to allow health professionals other than medical doctors to provide certification of an applicant's ability to use fixed route transit, such as occupational therapists, orientation and mobility specialists, and physical therapists.
2. GRTA should move toward conducting in-person functional assessments as part of its eligibility determination process for ADA complementary paratransit service. GRTA should also develop a master functional skills list for determining conditional eligibility that is transit specific and includes a comprehensive list of all the physical, cognitive, and sensory skills necessary to get to and from the bus, to wait for the bus, to get on and off the bus at the right place, to ride the bus, to navigate the environment, and to deal with the unexpected.
3. GRTA should revise its eligibility determination letters to include specific reasons for denying eligibility and state the specific conditions when an individual may use ADA complementary paratransit service when approved for conditional eligibility.

4. Eligibility determination letters that grant less than unconditional eligibility should include information on how to file an appeal.
5. GRTA should identify the members of its appeal committee and/or the credentials of its members.
6. GRTA must develop a process for ensuring that trips missed by a rider due to circumstances beyond his or her control are not counted as no-shows for purposes of establishing a pattern or practice upon which a suspension of service is based.
7. GRTA should not automatically cancel the trips of a rider who misses an initial trip. GRTA may make an effort to contact the rider, but must keep the trips on the schedule until (and if) the rider cancels them.
8. GRTA should consider using its standard of three no-shows in 30-days as a trigger for further review, but then examine the actual trip-making record, comparing the number of no-shows with the total number of trips requested in the month, and determining whether any no-shows are beyond the passenger's control before imposing a suspension.
9. GRTA should reduce the potential 180-day suspension period for riders who have a second offense for no-shows.
10. GRTA should reconsider the potential suspension period for riders who commit prohibited acts or misconduct; the potential suspension period of up to 365 days could be considered excessive. In addition, GRTA should make clear that a rider may appeal any suspension.

7 Telephone Access

Telephone access for placing or changing trip reservations or checking on the status of a ride 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.

Telephone access is governed by Section 37.131(b) of the DOT ADA regulations, which requires that a transit agency accept trip requests, at minimum, made the day before the trip. 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 team collected the following information about telephone access to the GRTA ADA complementary paratransit service:

- Consumer input 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 Input

In its consumer interviews, the review team asked paratransit riders whether the time spent on the telephone waiting to speak with a reservationist is excessive. One rider said he generally uses only subscription trips and does not have enough experience to comment. Another rider described telephone access as “not too hard but getting harder” and another estimated that she gets a busy signal or recording 25–30 percent of the time. Two others said that it is particularly difficult to get through to a reservationist during the lunch hour. One rider said that Saturday or Sunday are the best times to call, and another said that mornings are not generally a problem. Overall, their responses suggest that telephone access can be difficult at some times and relatively easy at other times.

7.2 Phone Service Standards and Performance Monitoring

At the time of the on-site review, GRTA did not have standards for its telephone service nor were they monitoring telephone system performance. GRTA stated in its January 10, 2010 letter transmitting the data requested by FTA that, “Guam currently does not have telephone call-handling standards. There are three lines available for riders to call. The goal is to answer every incoming call and to handle the call as quickly and thoroughly as possible.”

7.3 Phone System Design

KEI accepts trip requests 7 days a week, 8 a.m. to 5 p.m. There are three telephone lines dedicated to transit services (671-647-7433, 7434, and 7435). Neither GRTA nor KEI have a TDD line. According to GRTA, if caller uses a TDD, he or she needs to use the local Guam

relay system to request a trip. However, GRTA does not provide this information in any of its public documents.

If all three lines are busy—or if there is no answer after 20 rings—the call is automatically transferred to the KEI general voicemail, which can store approximately 20 messages. According to KEI, rider messages are rarely left on the general voicemail, which typically has several messages per month overall.

If a caller hangs up before leaving message, there is no record of a dropped call.

7.4 Reservations and Dispatch Staffing

The reservations, scheduling, and dispatching functions are combined and handled by three full-time and three part-time individuals, called dispatchers, who are employed by KEI. The dispatchers also handle requests for general public demand-responsive service, which is operated separately from the ADA paratransit service.

During working hours (8 a.m. to 5 p.m.) two employees are available to answer calls on two telephone lines. After 5 p.m., KEI dispatchers answer the phone until the last bus returns (7:30 p.m.) but does not take trip reservations. From 7:30 p.m. to midnight, KEI tour operations dispatchers answer the telephone lines. If a rider calls during these hours, the dispatchers respond that the transit lines are closed and will reopen at 5 a.m.

Monday through Saturday, two dispatchers are on duty from 8 a.m. until 5 p.m. One dispatcher arrives at 4 or 5 a.m., depending on the day, and one dispatcher is on duty from 5 to 9 p.m. On Sunday, when service is very light, one dispatcher is on duty from 7 a.m. to 7 p.m. The KEI office is closed on Christmas and New Year's Day; no calls are taken on those days.

The call center dispatchers' schedule for February 15–21, 2010, is shown in Table 7.1.

Table 7.1 – Call Center Schedule: February 15–21, 2010

Dispatcher	Mon	Tues	Wed	Thurs	Fri	Sat	Sun
1	8–5	8–6		8–5	9–5	8–5	
2			8–5	5–1	5–1	5–1	
3	4–1	5–1	5–1				7–7
4						1–9	
5	1–9	*	1–9	*	1–9		
6		1–9		1–9			

* Not scheduled for dispatching but available

7.5 Observations of the Call-Handling Process

The review team observed the operations in the reservations and dispatch area in the afternoon of February 9 (Tuesday) and the morning and afternoon of February 10 (Wednesday). During those times, dispatchers promptly answered calls and no calls were placed on hold for more than a few seconds.

7.6 Telephone Performance Reports

No telephone performance reports were available for review.

7.7 Findings

1. GRTA has no standards for its telephone service.
2. Neither GRTA nor KEI, which accepts the calls on behalf of GRTA for ADA paratransit service, measures or monitors call volumes, hold times, or calls sent to voicemail.
3. Neither GRTA nor KEI have a TDD line. For individuals who use a TDD, there is no public information on how to contact GRTA or KEI for ADA paratransit service.
4. KEI accepts trips requests from 8 a.m. to 5 p.m. 7 days a week. However, riders cannot make trip requests on Christmas or New Year's Day, even though GRTA provides ADA paratransit service on the following days.

7.8 Recommendations

1. GRTA should develop a standard for telephone service. This standard should stipulate the proportion of incoming calls that are answered within a specified number of seconds (e.g., x percent of calls within y seconds) and a maximum number of seconds in which all calls should be answered.
2. GRTA should require KEI to upgrade its telephone system so that KEI can monitor and report (by hour of day) call volumes, hold times, and abandoned calls.
3. GRTA should acquire a TDD line or require KEI to acquire a TDD line. GRTA (or KEI) staff should be trained to use the TDD to communicate with individuals who use it.
4. GRTA should require KEI to develop a procedure for riders to make trip requests on days when the KEI office is closed, but ADA paratransit service is provided the following day.

8 Trip Reservations Process

While the previous chapter addressed access to reservations, this chapter focuses on how GRTA handles trip requests. Section 37.131(b) of the DOT ADA regulations requires 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 system 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.

In this part of the review, the review team pays particular attention to policies regarding trip reservations and whether GRTA uses any form of trip caps or waiting lists. In addition, the review team researches whether there is a pattern or practice of denying a significant number of ADA-eligible trip requests. Finally, this portion of the review examines the policies and procedures concerning the negotiation of requested trip times. The review team examined how GRTA handled trip requests from riders. Particular attention was given to policies and procedures regarding trip reservations and negotiation of requested trip times, whether GRTA uses any form of trip caps or waiting lists, and whether there was a pattern or practice of denying a significant number of ADA eligible trip requests.

The review team gathered and analyzed the following information:

- Consumer input through telephone interviews, and comments and complaints on file at FTA and GRTA
- Reservations policies and performance standards
- Service reports prepared by GRTA showing the number of trips served and the number of trips denied for the past three years
- Direct observations of the handling of trips and interviews with GRTA about the ability to accommodate trip requests

8.1 Consumer Input

FTA has one complaint against GRTA on file, which was received in June 2004 (Complaint Number 04-0171). The original complaint alleged that reservationists asked insensitive questions about the rider's disability. The same complainant sent a letter to FTA in November 2006 stating that there had been a persistent pattern of failure to provide next-day ADA complementary paratransit and that it was not possible to make reservations 14 days in advance. (In 2006, GRTA extended its advance reservations window to 14 days, as permitted under DOT ADA regulations.)

The review team asked riders whether they could make a reservation on the first call or whether they are told they are on a wait list. None of the interviewed riders had been wait-listed but all felt that it is often difficult to reserve a trip at the desired time unless they call well in advance. One rider reported calling one week in advance and another reported calling two weeks before the desired day. Three riders said it is generally impossible to make a next-day reservation. This was not consistent with the review team's observations, discussed later in this chapter.

One rider said she is often offered trip times more than an hour from her requested time, and that the schedule is particularly full from 8–10 a.m. and 4–6 p.m. Another rider estimated that she could get her desired trip 45 percent of the time. All riders stated that they are able to make reservations based on a desired drop-off time subject to the constraints just described.

8.2 Service Standards

In its pre-review request, FTA asked for written policies regarding trip denials, standby status, and waiting lists. In its January 10, 2010, letter transmitting the FTA-requested data, GRTA stated, “Currently there is no set level or percentage of acceptable trip denials; our goal is 100 percent service.” At the time of the on-site review, GRTA did not have any written policies regarding their trip denial standard, standby status, or waiting lists.

Subscription Service

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 there is no capacity constraint, there is no limit to subscription service.

The KEI dispatchers review and update standing order (subscription) trips every month. These trips become a template for the reservations log sheets used to schedule the daily runs. Subscription trips comprise a large proportion of the trips; during the sample period from December 1–7, 2009, subscription trip comprised 55 percent of all GRTA’s scheduled paratransit trips.

Transit systems should look at the proportion of subscription trips throughout the day, not just as an overall percentage. Attachment J presents the number and percent of subscription trips scheduled for each hour of the service during this week. On a consistent basis, there were times of the day when subscription trips accounted for all or most of the scheduled trips. During the weekdays of the sample week for each 3-hour period between 5:30–8:30 a.m., subscription trips comprised at least 67 percent of all scheduled trips in all but one of the hours analyzed. In the early afternoon for these five days (1:30–3:30 p.m.), subscription trips comprised at least 67 percent of all scheduled trips for all but two of the hours analyzed. By allowing such a large proportion of subscription trips during these times, GRTA may have difficulty accommodating demand trips during these hours. The large number of subscription trips may be restricting access to the small fleet, which operates throughout the island.

8.3 Review of Recorded Trip Denials

KEI tracks trip denials for paratransit service using a form entitled, “ADA Paratransit Ride Denial Tracking Log.” KEI provides the denial log sheet to GRTA with its monthly ridership report. A sample log (November 2009) is presented in Attachment K. This log listed nine denials for the month. This represents 0.35 percent of the total trips requested that month. KEI and GRTA staff stated that they have not achieved zero trip denials but the rate of denials has stayed under 1 percent during 2009 and 2010.

8.4 Observations of the Handling of Trip Requests

GRTA accepts trip reservations every day from 8 a.m. to 5 p.m., seven days a week (with the exception of Christmas and New Year's). GRTA trip requests can be placed from one to 14 days in advance. A next-day reservation made near 5 p.m. can be for a pickup as early as service is provided. The review team observed the operations in the reservations and dispatch area in the afternoon of February 9 (Tuesday) and the morning and afternoon of February 10 (Wednesday).

Reservations Process

When a call comes in to the call center, the dispatcher first asks the caller to provide his or her name and the date of the requested trip. There is a binder of paper reservations log sheets (sometimes referred to as call sheets) for each day in the 14-day period for which reservations are being accepted. Attachment L presents a sample reservations log sheet.

KEI maintains separate log sheets for each route. Five paratransit routes, known as “Freedom” routes, cover different sections of the island and operate Monday–Saturday with three routes operating on Sunday. Log sheets have columns for entering the date and time of the call, the pickup time, the rider's name, pickup and drop-off locations, and additional columns to indicate if the rider uses a mobility aid and whether the rider travels with a PCA. As described below, each sheet is pre-printed with subscription trips and has additional empty lines on which demand trips are entered by hand. These log sheets are thus preliminary schedules for each paratransit vehicle (Freedom 1 through 5).

The dispatcher then asks the caller for a requested pickup or drop-off time and the pickup and drop-off locations. Trips may be scheduled based on either pickup or drop-off times as the caller wishes. For drop-off driven calls, the dispatcher uses his or her personal familiarity with the service area to choose an appropriate pickup time.

Using this information and the dispatcher's knowledge of the service area, the dispatcher selects the log sheet for an appropriate ADA paratransit run and attempts to fit the trip into the preliminary schedule. Because there is overlap among the areas served by each ADA paratransit vehicle, the dispatcher may consult more than one sheet for the day requested. If the trip fits into the day's schedule for a particular run, the dispatcher enters the trip information by hand on an empty line at the desired time of day.

The review team observed the reservations process on Tuesday, February 9, from 3:30–5 p.m., and on Wednesday, February 10, from 8:30–10 a.m. and from 3–4:30 p.m. The review team recorded 30 trip requests. Because the same individuals accept reservations, schedule trips, and dispatch ADA paratransit and demand-response trips, there is no separate telephone number for dispatch, cancellations, or rider-service inquiries. While on site, the review team observed 11 additional calls that were confirming or canceling paratransit pickups, requesting an earlier pickup for the return trip, inquiring about eligibility, or asking where the van was. In addition, the ADA complementary paratransit reservationist took 31 calls for demand-response trips when the dispatcher was busy.

Among the 30 observed calls for ADA paratransit reservations, the dispatchers negotiated the pickup time for four trip requests, accepted the requested pickup time without negotiation for 21 other trip requests, and scheduled five other trip requests based on the requested drop-off (appointment) time. The review team observed no denials either from an inability to schedule a

trip on the desired day or from negotiation to a time more than one hour before or after the requested time.

In general, the dispatchers were courteous and professional with riders. However, they did not mention the pickup window to the callers or confirm all information by repeating the trip details back to the rider. This may be due to their familiarity with individual riders and their origin and destination addresses. During the call observations, the review team did not observe any ADA paratransit calls remaining on hold for more than a few seconds.

The distribution of calls in terms of the number of days that the call was made in advance of the travel date can be an indicator of capacity constraints in an ADA paratransit system. The review team tabulated 92 requests for demand trips from the call records for December 1–2, 2009. Table 8.1 summarizes this analysis. As shown, of the 92 trip requests observed, 21 were for service on the following day and only three were made more than 7 days in advance. This distribution of requests suggests that many callers feel comfortable making next-day trip requests.

Table 8.1 – Sample of Trip Requests by Days in Advance of Trip

Days in Advance	Number	Percent
1	21	23%
2	7	8%
3	10	11%
4	12	13%
5	15	16%
6	15	16%
7	9	10%
8	3	3%
9–14	0	0%
Total	92	100%

Trip Negotiations and Denials

KEI staff explained their process for recording and tracking denials. If all the schedules are full at the requested time, the KEI dispatcher attempts to negotiate an alternative time with the caller. If there is no opening within one hour of the requested time, the dispatcher suggests a different time when the trip could be accommodated. If the caller accepts a time more than one hour before or after the requested time, the dispatcher enters the trip on the reservations log sheet and also enters information about the call on a denial log sheet for the month as discussed below.

The dispatcher logs the trip request as a denial if the negotiation results in an appointment more than one hour before or after the requested trip time, if the caller does not accept the offered trip time, or if there are no openings on requested day. The dispatcher records the rider's name, call date, requested trip date, the requested and offered trip times, and comments. The denial log also has a column to indicate whether the trip origin is within $\frac{3}{4}$ -mile of a fixed route. Since GRTA's stated service area is island-wide, this information is not relevant to the denial.

In response to review team questions, the dispatchers correctly defined denials as including negotiated trip times more than one hour before or after the requested time, whether those times

were accepted by the rider or not. During the week of the review, KEI logged two denials, although the review team did not observe either denial.

8.5 Trip Confirmations

Trips are scheduled in real time while the caller is on the phone. KEI dispatchers make callbacks only if there is a change in the scheduled pickup time or if a previously denied trip becomes available as a result of a cancellation.

8.6 Findings

1. At the time of the on-site review, GRTA did not have any written policies regarding their trip denial standard, standby status, or waiting lists.
2. In general, the dispatchers were courteous and professional with riders. However, they did not confirm all information by repeating the trip details back to the rider or ensure that the rider was aware of the pickup window.

8.7 Recommendations

1. GRTA should develop written policies that prohibit trip denials, waiting lists, standby lists, and other operational capacity constraints.
2. GRTA should continue to track and monitor trip denials. GRTA should explore options for increasing trip capacity, whether through increased resources or more efficient operations. GRTA should accept and confirm all trip requests. GRTA should consider establishing a list of unscheduled trips (not a waiting list) that could not be accommodated within the 1-hour negotiation window and have schedulers work trips into the final schedule, notifying passengers of their scheduled pickup time.
3. GRTA should instruct KEI dispatchers to confirm trip details with riders during the reservation call, including describing the pickup window. One way to address this is to use a formal script for accepting trip requests.
3. GRTA should explore options for improving system capacity for demand trips during peak hours when subscription trips may consume all or most of the available trips. In a sample week chosen by the review team (December 1–7, 2009), subscription trips comprised 55 percent of all GRTA’s scheduled paratransit trips. On a consistent basis, there were times of the day when subscription trips accounted for all or most of the scheduled trips. During the weekdays of the sample week for each 3-hour period between 5:30–8:30 a.m., subscription trips comprised at least 67 percent of all scheduled trips in all but one of the hours analyzed. In the early afternoon for these five days (1:30–3:30 p.m.), subscription trips comprised at least 67 percent of all scheduled trips all but two of the hours analyzed. By allowing such a large proportion of subscription trips during these times, the system may have difficulty meeting the demand for next-day trips during these hours.

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. In order to evaluate GRTA’s performance in this regard, the review team examined on-time performance, missed trips and no-shows, and on-board travel times for GRTA’s ADA complementary paratransit service.

To assess service quality, the review team:

- Obtained input from consumers regarding on-time performance and travel times through telephone interviews and a review of complaints filed with GRTA
- Reviewed GRTA’s relevant service policies, procedures, and standards
- Observed GRTA’s scheduling and dispatch functions and interviewed the appropriate staff
- Interviewed drivers about schedules provided and dispatch support received
- Reviewed GRTA’s 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 ADA complementary paratransit trips with those of comparable fixed route trips

9.1 Consumer Input

In a November 2006 letter to FTA from the complainant who filed the June 2004 complaint (FTA complaint # 04-0171) the complainant cited excessively long trips, as well as the GRTA’s failure to provide timely service.

During the telephone interviews, the review team asked riders whether they are picked up and dropped off on time. Opinions differed, with four of the six riders saying that pickups were mostly on time, while one said that pickups could range from too early to late by 5–10 minutes and another said she may wait 20–30 minutes for her pickup if the van is full. Three riders felt that drop-offs are likely to be on time or early (one said 5–30 minutes early if the pickup is early) and the other three said that drop-offs are sometimes late, particularly if there are other passengers on the van. One rider said that the majority of schedules are too tight for good on-time performance.

Five of the riders said that drivers generally know how to find the destination based on the address on the manifest, but one estimated that a quarter of the drivers are poor in this regard. One of the riders noted that drivers seek wayfinding advice from each other via radio.

Riders were asked if their trips are often very long, e.g., more than an hour. One said that this happens only “once in a blue moon,” and another said that his trips usually take 30–45 minutes. Another said she tries not to make reservations for times when trips are likely to be long due to traffic or heavily loaded vans. Three other riders said that if the van is heavily loaded, trips may be long, with one stating that they take 30–45 minutes longer than normal, a second stating that a

20-minute trip can take up to an hour, and a third stating that her trip sometimes takes up to two hours in these circumstances.

For complaints on file with GRTA for the 12-month period February 2009 to January 2010, eight of the 25 complaints dealt with some aspect of service performance. There were two complaints about missed pickups, and one complaint each about a drop-off at the wrong location, a long trip, and a late pickup. In addition, three complaints referred to driver behavior.

9.2 Service Standards and Policies

On-Time Performance Policies and Standards

GRTA has an on-time window for pickups of ± 10 minutes relative to the negotiated pickup time. However, GRTA has no standard for determining what constitutes on-time performance for its drivers, and does not have a definition for what constitutes an on-time drop-off when a rider has specified an appointment time. As a result, GRTA has no performance standard for on-time drop-offs.

No-Show and Missed Trip Definitions and Performance Standards

According to the Paratransit Rider's Guide, "If the trip is not canceled at least 1 hour before the scheduled pickup time, the cardholder will be considered a No Show."

GRTA does not have a definition or standard for a carrier missed trip. As a result, neither GRTA nor its contractors track missed trips. Contractors do not have a contractual incentive to avoid missed trips.

Travel Time Policies and Standards

GRTA's materials submitted prior to the on-site review stated "Guam currently follows the FTA guidelines of a comparable trip whereby the paratransit trip should not take longer than if the rider utilized fixed routes and other services in the system for the same pickup and destination points on the same day/ time."

9.3 Daily Operations

Scheduling Procedures

As described in Chapter 8, three full-time and three part-time KEI employees (dispatchers) handle the reservations, scheduling, and dispatching functions. The dispatchers also handle requests for the general demand-response service, which is also operated under contract to GRTA but is separate and apart from the ADA complementary paratransit service.

From 8 a.m. to 5 p.m., one dispatcher focuses on accepting and scheduling ADA paratransit trips, while the other focuses on managing the demand-response trip requests and dispatching for both services. They provide backup to one another throughout the day because they sit in close proximity.

Generally, the dispatcher is working on the ADA paratransit schedules for the next day while they accept new reservation requests and dispatch trips.

The process for preparing driver schedules for the next service day is to transfer the handwritten demand trips from the reservation log sheets into an Excel spreadsheet for each ADA paratransit

vehicle. Trips may be moved from one route to another to optimize the schedule while preserving the negotiated pickup time. If the time is changed, the dispatcher calls the rider to confirm that the change is acceptable. Schedules are completed by 5 p.m. the day before service, printed, and faxed to each carrier.

The ability to schedule trips can be somewhat of a challenge because there is no GRTA service from 12–1:30 p.m. to accommodate lunches and shift changes. As a result, it can be difficult to schedule late-morning and early afternoon pickups. The dispatchers also noted that scheduling trips for weekday service is getting harder due to the limited availability of vehicles. Saturday demand has been increasing while Sunday demand has remained light.

Dispatch Procedures

The review team observed the call center, including dispatching, at KEI on Tuesday afternoon and Wednesday morning. Dispatching for GRTA's ADA paratransit, demand-response, and fixed route service takes place at KEI. At least one dispatcher is on duty during all service hours and two are available from 8 a.m. to 5 p.m., Monday–Saturday.

The early and late dispatchers assign vehicles (distributing and collecting keys) and schedules to drivers ("window dispatch") at the beginning and end of the shifts, and additional managers are available to provide backup as needed. Dispatchers monitor service and handle "Where's my ride?" calls for all three carriers. Most driver communication is via two-way radio and most of the actual dispatching of service is for general-purpose demand-response (non-ADA) service. Because of the monthly contracts issued by GRTA, KEI and the other carriers have not made major investments in computers or automated vehicle location technology (AVL).

Drivers are supposed to call to record pickups and drop-offs with the dispatcher. This is not enforced because the dispatchers are actively managing the demand-response real-time travel requests while simultaneously responding to radio traffic.

If a passenger appears to be a no-show, drivers are required to call the dispatcher to record the no-show and proceed after approval from the dispatcher. Dispatchers record the time of the request on the log sheet and check the manifest to confirm that the driver arrived within the scheduled pickup window. In contrast to GRTA's written procedure, the GRTA dispatchers stated that GRTA does not cancel a no-show rider's scheduled return trip unless the rider cancels that trip.

The dispatchers noted that they sometimes find the telephone numbers and secondary contact information (e.g., of a guardian or relative) to be out of date. This can be important when a dispatcher is trying to contact a rider to avoid a no-show. GRTA maintains this information in an Access database file. At the time of the on-site review, GRTA provided a paper copy of the registration list to KEI. GRTA was working to develop an Excel spreadsheet with this information that would make it easier to transmit updated rider information to KEI.

9.4 Driver Interviews

There are 46 drivers working for the three contractors who are assigned to any of the three GRTA services as needed. While on site, the review team interviewed 16 drivers. The interviewed drivers have a range of experience from one year to over 29 years. The average tenure for the drivers interviewed is approximately 8 years. The review team asked each driver a

series of questions about the training they received, various aspects of their jobs, policies and procedures, and vehicles.

Nine of the 16 drivers indicated that they felt the training received was very helpful. Six drivers mentioned the sensitivity training as being particularly helpful. Another six drivers indicated that they received training on the operation of equipment, in particular the use of securements. When asked about refresher training, fourteen of the sixteen drivers indicated that they were aware of, or had benefited from, refresher training. Two drivers indicated that the refresher training was a repetition of the initial training, but three other drivers referred to new areas on emergency training and evacuations.

Drivers were asked to describe what they found to be the most difficult aspect of driving. Seven drivers referred to difficulties with riders. Two of these seven drivers indicated that communicating with riders who have cognitive disabilities can be a challenge. Three of these seven drivers mentioned riders that complain or give drivers a “hard time.” Riders that do not know GRTA policies and riders that argue with other riders were also mentioned as difficulties of the job. Another seven drivers indicated that schedules and being on time are the hardest part of the job for them. Learning the roads and old vehicles were also listed as difficulties. One driver indicated that explaining a vehicle’s inability to use narrow driveways as the toughest part of the job.

Fourteen of 16 drivers indicated that they felt the schedules they were given were too “tight,” i.e., not enough time to provide timely pickups and drop-offs. Two mentioned that schedulers seem unaware of driving times when making schedules. Two of the drivers said that they have 10–15 passengers per run, and two others said they do 18–20 trips in a busy day. One driver suggests that more vehicles and an upgraded scheduling system would help the situation. Thirteen of 16 drivers said they arrive early to stay on schedules at least some of the time or if they know the passenger will be ready. One driver indicated that an early arrival could be as much as 15–20 minutes before the scheduled pickup time.

When asked for the definition of an on-time pickup, eight drivers indicated that arriving within five minutes of the pickup window (+5) would qualify as an on-time pickup. Two drivers indicated that the pickup window was 5–10 minutes before or after the scheduled time. One driver indicated that an on-time pickup meant arriving at the scheduled time exactly, and one driver indicated a pickup window of 20 minutes before or after the scheduled time. Two other drivers indicated that an on-time pickup required arriving up to 5 minutes before the scheduled time.

On the related question of whether or not the passengers understood the on-time (or pickup) window, five of the drivers indicated that the riders understood the pickup window, and three drivers said that “most” riders understood it. Four drivers indicated that riders do not understand the pickup window, and two mentioned having riders that were not ready when the ride arrived. One driver indicated that riders believe the scheduled time is exact and do not come out before it.

When asked if riders sometimes have a different pickup time than what is on the schedule, six of the drivers indicated no, it never happened. Five drivers indicated that it happened rarely. Two drivers said it happens sometimes, and only one driver answered yes.

Drivers were then asked what they did if a rider did not board the vehicle as scheduled. Seven drivers said that they wait 5 minutes and then call the dispatcher to receive permission to leave.

Another seven indicated that they just call the dispatcher and leave when they have received permission. Two of the drivers indicated that they would also honk the horn. Two other drivers indicated that they would fill out a no-show card at the end of the day. One driver mentioned that while it is part of the protocol to leave a note on the door, he is concerned about the “liability” of entering a rider’s property.

Six of the drivers indicated that they ran late often or “almost daily.” Two drivers indicated that they never ran late, and two drivers indicated running late “not often” or a couple of times a month. Three drivers indicated running late a couple of times a week and one driver said it depends on the schedule. All of the drivers indicated that they would call the dispatcher if they were running late. Six of the drivers indicated that the dispatcher would reassign trips. Seven drivers said that the dispatcher is able to help by rearranging trips only “sometimes.” One driver calls other drivers directly to get help when running behind schedule. Two drivers indicated that the dispatcher would call riders to tell them to expect a late ride if there were no vehicles available to rearrange trips.

When asked if they would provide help to riders beyond the curb, five drivers indicated they would if needed and two said they helped most riders. Two drivers specified that they would help a rider who had a vision impairment. One driver reported that he assisted riders who use wheelchairs. One driver helps if asked by the rider, and one will help with bags. Two drivers (both of whom worked for KEI) said they did not provide assistance beyond the curb; one of them indicated that they were not authorized to help.

Six drivers indicated that the instructions provided on the driver’s manifest were helpful and accurate. One driver indicated that sometimes it was not noted when a passenger would be accompanied by a PCA. One driver indicated that instructions were “not necessarily” correct. The remaining eight drivers had no comment.

Fourteen of the drivers remarked that vehicles are “okay” but old. Three of these drivers mentioned vehicles breaking down a couple of times a month. One said that the handling is not good. Two drivers stated that the vehicles are not in good repair. However, nine drivers indicated that repairs of the vehicles are prompt. One driver said that repairs take time, and one said that the maintenance team does their best.

9.5 On-Time Performance

Reported On-Time Performance

GRTA has an on-time window for pickups of ± 10 minutes relative to the negotiated pickup time. However, GRTA has no standard for on-time performance. GRTA does not track or do any measure of on-time pickup performance. Drivers are not required to record actual pickup times.

Calculated On-Time Performance for Sample Day

The review team performed an independent calculation of on-time performance. The review team looked at driver manifests for a 2-week period, December 6–19, 2009. There were 122 manifests during this period. Drivers recorded actual pickup times on only 28 of these 122 manifests (23 percent). From these, the review team recorded route and time information for 3–5 completed trips per manifest: scheduled pickup time, actual pickup arrival time, and actual drop-

off time. The total sample for this analysis was 112 paratransit trips. Table 9.1 presents a summary of the pickup performance for the sample set of trips.

**Table 9.1 – Calculated On-Time Pickup Performance
December 6–19, 2009**

Pickups	Number	Percent
>30 minutes late	3	2.7%
16–30 minutes late	6	5.4%
1–15 minutes late	15	13.4%
In window (-10/+10)	70	62.5%
1–15 minutes early	10	8.9%
16–30 minutes early	7	6.3%
>30 minutes early	1	0.9%

As presented in Table 9.1, 62.5 percent of the trips in the sample had pickups in the ± 10 -minute window. Another 16.1 percent of trips had pickups before the beginning of the window. This yields 78.6 percent of trips with pickups early or in the window. This means that the portion of late trips was 21.4 percent. Of the late trips, 13.4 percent were 1–15 minutes late, 5.4 percent were 16–30 minutes late, and 2.7 percent were more than 30 minutes late. On average, more than one of every five trips had a late pickup.

If one were to apply a pickup +15 window to the negotiated pickup time, which is a more typical window for paratransit pickups, then performance would improve slightly to:

- In window 70.5 percent
- In window or early 81.3 percent
- All late 18.8 percent

This proportion of pickups in the window or early is still below the on time performance standard used by most paratransit systems.

In order to analyze a sample of manifests, the review team was aware of some limitations, including:

- Even for these 28 manifests, not all trips had actual written pickup times. The review team assumed that the driver was implying that the actual pickup time was the same as the negotiated time.
- The analysis presumes that these 28 manifests—and the drivers who completed them—are representative of the entire GRTA ADA paratransit service. For instance, can it be presumed that the drivers who record pickup times are as timely in pickups as the drivers who do not record the pickup times (or perhaps more timely)? Are the runs assigned to these drivers similar to the entire set of ADA paratransit runs?

According to KEI managers, the drivers who record the actual pickup and drop-off times tended to be more experienced and were doing so because they had been required to do so in the past. One might then conclude that the performance presented here overstates the systemwide performance.

In addition, there is no data for requested drop-off times. KEI staff may ask riders for appointment times when taking trip requests, but these times are not recorded and do not appear

on driver manifests or dispatcher logs. A driver may learn of an appointment time from a rider. As a result, it is not possible to measure on-time performance for drop-offs.

9.6 No-Show and Missed-Trip Coding

KEI records rider no-shows and cancellations on a daily basis on a hand-written form. KEI staff then transfers the no-show and cancellation data to monthly Excel tables. The data for no-shows and cancellations is tabulated by individual rider and by day of month. KEI provides these monthly tabulations to GRTA.

GRTA does not retain the data needed to verify no-shows. As a result, the review team could not analyze whether the no-shows that had been recorded represented actual trips missed by the rider, trips missed by GRTA, or trips missed by the rider due to circumstances beyond the rider's control.

GRTA also does not require KEI to track missed trips.

9.7 On-Board Travel Times

The review team analyzed a sample of 112 ADA complementary paratransit trips made from December 6–19, 2009. Table 9.2 shows the distribution of travel time for those trips, as determined by pickup and drop-off times recorded on driver manifests. The average travel time for trips in this sample was 27 minutes and the median travel time was 23 minutes. About 94 percent of the trips were 60 minutes or shorter, with 78 percent less than or equal to 30 minutes. About 6 percent of the trips exceeded 60 minutes.

**Table 9.2 – On-board Travel Times for Sample of
GRTA ADA Paratransit Trips Provided the Week of December 6–19, 2009**

On-board Travel Time	Number of Trips	Percent
Up to 15 minutes	36	32.1
16–30 minutes	40	35.7
31–45 minutes	17	15.2
46–60 minutes	12	10.7
61–90 minutes	6	5.4
91–120 minutes	1	0.9
Over 120 minutes	0	0
Total	112	100
Average travel time	27 minutes	
Median travel time	23 minutes	

As noted earlier in this chapter, the analysis for the travel times may not be representative of GRTA's entire ADA paratransit service. GRTA does not require drivers to record arrival and departure times. Fewer than a quarter of the manifests from the sample period (28 of 122 manifests) included pickup times recorded by the driver. The sample of trips analyzed for travel times are the same as those used for on-time performance. It is not certain that the performance of drivers who completed these manifests is representative of all paratransit drivers.

Comparison to GRTA Travel Time Standards

A second part of this review involved a comparison of ADA complementary paratransit travel times with comparable fixed route travel times, comparing the travel times for the same origin/destination pair at the same time of day for each mode.

GRTA does not have a specific travel time standard for its ADA complementary paratransit service. The materials provided in advance of the on-site review stated that GRTA “follows the FTA guidelines of a comparable trip whereby the paratransit trip should not take longer than if the rider utilized fixed routes and other services in the system for the same pickup and destination points on the same day/time.”

The methodology for the review team’s analysis typically includes drawing a random sample of long ADA complementary paratransit trips of more than 60 minutes that represent different service days and hours, and then comparing the on-board travel time to a comparable trip using fixed route for each origin-to-destination pairing. The fixed route times include a 5-minute wait time, on-board travel time, transfer time(s), and an allowance for travel to and from the bus stop at the origin and destination, if applicable.

For this analysis, the review team selected a sample of 15 ADA complementary paratransit trips made during December 2009. However, ADA complementary paratransit is offered island-wide, including areas where fixed route service is not available and demand-response service is provided instead. Because about 94 percent of trips are 60 minutes or shorter, and because drivers do not routinely record both the arrival and departure times for the pickup and drop-off locations, the sample was somewhat limited and based on usable data. Additionally, in 13 of 15 cases at least one leg of the fixed route trip routing actually involved using demand-response service. Therefore, the analysis results should be viewed with caution.

As shown in Table 9.3, overall the travel time required for an ADA complementary paratransit trips included in the sample was 75 minutes, which is 18 minutes shorter than the adjusted average time calculated for fixed route/demand-response trip (93 minutes). Note that 5 minutes of wait time was added for trips that included a fixed route origin and an additional 5 minutes was added to Trip #4, which included a three-block walk to the fixed route service.

For six of the 15 paratransit trips, the respective travel times were longer than the travel times of the comparable fixed route/demand-responsive trips, by an average of 33 minutes and a range of 3–72 minutes. For the other paratransit trips in the sample, the respective travel times were shorter than the travel times of the comparable fixed route/demand-responsive trips, by an average of 43 minutes and a range of 12–107 minutes.

Of the six long paratransit trips that had longer travel times than their respective comparable fixed route/demand-response trips, four had travel times of at least 20 minutes greater than the travel times of their respective comparable fixed route/demand-response trips. This extrapolates to 1.7 percent of all GRTA paratransit trips with excessive trip lengths. Acknowledging the limitations of the available data, it appears that there are not a substantial number of GRTA paratransit trips with excessive trip lengths.

Table 9.3 – Comparison of Travel Times on GRTA’s ADA complementary paratransit Service vs. Fixed Route for Selected Trips, December 2009

Paratransit Trip			Paratransit Travel Time			Fixed Route/Demand-Response Travel Time				
Trip #	Origin	Destination	Pick-up Time	Drop-off Time	Travel Time	Comparable Itinerary	Start Time	End Time	Travel Time	Paratransit – Adjusted FR/DR Travel Time
1	100 Uhang St, Macheche (~2 mi to FR w/o DR)	Jamaican Grill, Hagatna	5:10	6:30	80	Grey 2 (DR) Express (FR)	5:40	6:17	37	43
2	200 Pугue St, Latte Plantation (~3 mi to FR w/o DR)	Tamuning Mayor	5:14	6:46	92	Grey 2 (DR) Express (FR)	5:50	6:10	20	72
3	200 Pугue St, Latte Plantation (~3 mi to FR w/o DR)	CHDP Mongmong	5:25	6:50	85	Grey 2 (DR) Express (FR) Red 2 (DR)	5:50	6:30	45	40
4	Santos Lane, Mangilao (3 blks. to FR)	CHDP Mongmong	6:30	7:35	65	Red 1 (FR) Red 2 (DR)	5:30	6:10	40	15
5	100 Marigold Lp, Santa Ana Dededo (~6 mi to FR w/o DR)	Hafa Adai Ex, Tamuning	8:20	9:35	75	Grey 1 (DR) Express (FR)	7:30	9:17	107	-32
6	100 Bel Air Gardens, Mangilao	Santa Barbara Church (~4 mi to FR w/o DR)	8:30	10:23	113	Red 1 (FR) Express (FR) Gray 1 (DR)	8:30	10:15	105	3
7	400 E Sta Barbara, Dededo (~2 mi to FR w/o DR)	DYA, Mangilao	8:40	9:40	60	Grey 1 (DR) Express (FR) Red 1 (FR)	7:30	10:00	150	-90
8	100 Victor San Nicolas, Inarajan (~10 mi to FR w/o DR)	GRC, Hagatna	9:45	10:48	63	Green 1 (DR) Red 2 (DR)	7:30	9:35	125	-62
9	100 Crestangayu Ligan Terrace (~1 blk from FR)	Mangilao Public Health	8:55	9:58	63	Grey 1 (DR) Express ((FR) Red 1 (FR)	8:30	9:45	75	-12
10	CHDP Mongmong (~6 mi from FR w/o DR)	600 Gayinero Rd, Yigo	1:30 p.m.	2:34 p.m.	64	Red 2 (DR) Express (FR) Grey 2 (DR)	1:30 p.m.	3:30 p.m.	120	-56
11	CHDP, Mongmong (~6 mi to FR w/o DR)	100 S Falpe, Marianas Ter	1:30 p.m.	2:45 p.m.	75	Red 2 (DR) Express (FR) Grey 2 (DR)	1:30 p.m.	3:30 p.m.	120	-45

Paratransit Trip			Paratransit Travel Time			Fixed Route/Demand-Response Travel Time				
Trip #	Origin	Destination	Pick-up Time	Drop-off Time	Travel Time	Comparable Itinerary	Start Time	End Time	Travel Time	Paratransit – Adjusted FR/DR Travel Time
12	GPO Theaters	800 Toto Canada Road, Hagatna (~4 mi to FR w/o DR)	1:30 p.m.	2:50 p.m.	70	Blue 1 (FR) Red 2 (DR)	2:30 p.m.	3:50 p.m.	100	-35
13	K-Mart	100 Chn Ayuyu, Campwetik (~4 mi to FR w/o DR)	1:30 p.m.	2:36 p.m.	66	Express (FR) Green 1 (DR)	1:30 p.m.	4:00 p.m.	90	-29
14	DOA GMTA Office (~4 mi to FR w/o DR)	100 N Leo Ten, Talofofo	1:35 p.m.	2:48 p.m.	73	Red 2 (DR) Green 1 (DR)	1:30 p.m.	3:50 p.m.	180	-107
15	GRC, Hagatna (~4 mi to FR w/o DR)	1 Dydasco Apt, Ipam	3:00 p.m.	4:15 p.m.	75	Red 2 (DR) Green 1 (DR)	3:20 p.m.	4:10 p.m.	50	25
Average Travel Time					75				93	-18

DR: demand-response

FR: fixed route

Notes

Dispatchers estimated distance to FR portion of trip.

Dispatchers estimated travel time for DR portions of the comparable trips.

For FR wait time at origin, 5 minutes added to on-board time; for 1 block to FR, 5 minutes wait/walk time added; for 3 blocks, 5 minute wait and 5 minute walk time added. No walk/wait time added for demand-response routing.

9.8 Findings

1. GRTA regards a trip canceled less than 1 hour before the scheduled pickup time as functionally equivalent to a no-show. It does not have any other written policies concerning no-shows.
2. GRTA does not have a definition or standard for a carrier–missed trip. As a result, neither GRTA nor its contractors track missed trips. Contractors do not have a contractual incentive to avoid missed trips.
3. Dispatchers reported that additional demand for service on weekdays is leading to vehicle schedules with more trips, resulting in runs that are more difficult to operate on time. The ability to schedule trips can be somewhat of a challenge because there is no GRTA service from 12–1:30 p.m. As a result, it can be difficult to schedule late-morning and early-afternoon pickups. In addition, Saturday demand has been increasing.
4. KEI handles on-the-road dispatching for all three services using two-way radios. Drivers are supposed to call to record pickups and drop-offs with a dispatcher. However, the KEI dispatchers indicated that this is not enforced because the dispatchers are actively managing both paratransit and general demand-response travel requests while simultaneously handling radio traffic.
5. The dispatchers noted that they sometimes find that riders’ telephone numbers and secondary contact information is out of date. This lack of timely information can be important when a dispatcher is trying to contact a rider to avoid a no-show.
6. None of the 16 drivers interviewed knew the correct pickup window.
7. Drivers had an inconsistent understanding of GRTA’s policy for providing assistance to riders. Two drivers (both KEI) said they did not help beyond the curb; one of them indicated that they were not authorized to help.
8. Neither GRTA nor KEI monitor or measure on-time performance for pickups.
9. Drivers are not required to record actual pickup or drop-off times. In a two-week sample of driver manifests, 28 of 122 (23 percent) had actual pickup and/or drop-off times.
10. Based on the limited set of manifests with data from the sample period, GRTA pickups were on time or early for 78.6 percent of trips. If one were to compute pickup performance using a window of +15 minutes (more typical for ADA paratransit), then the performance for the sample set of trips would improve slightly, to 81.3 percent on time or early. This level of performance is well below the standard used by most paratransit systems.
11. GRTA does not have a definition for an on-time drop-off (appointment time). As a result, GRTA has no performance standard for on-time drop-offs.
12. Neither GRTA nor KEI monitor or measure on-time performance for drop-offs. GRTA does not require KEI call-takers to record appointment times (when requested by riders), so this information is not available to schedulers, dispatchers, or drivers. As a result, it is not possible to measure on-time performance for drop-offs.
13. GRTA does not have a specific standard for on-board travel time.

14. Drivers do not routinely record arrival and departure times for pickups or drop-offs, making it difficult to determine on-board travel times, which are typically calculated based on the departure time for the pickup to the arrival time for the drop-off.

9.9 Recommendations

1. In order to minimize the potential for no-shows, GRTA should ensure that information on when the rider should be ready for a pickup and how long the driver has to wait within the pickup window is clearly communicated to drivers and passengers.
2. GRTA should develop a definition for a carrier-missed trip. It should set a standard for missed trips and monitor KEI's performance relating to missed trips.
3. GRTA should work with KEI to ensure that dispatch staffing remains sufficient to maintain proper service quality for ADA paratransit riders.
4. GRTA and KEI should work to ensure that the rider information database is updated and accurate and provide that information to KEI on a regular basis.
5. GRTA should have its contractors re-train their drivers to ensure that they have the correct understanding of the pickup window.
6. GRTA should ensure that drivers providing service on their behalf are properly trained to assist riders as appropriate to their duties.
7. GRTA should begin to have KEI measure on-time performance for pickups. GRTA should begin to monitor on-time pickup performance on a regular basis.
8. GRTA should reinforce the need for drivers to record arrival and departure times for pickups and drop-offs. GRTA should then use this data to analyze on-board ride times, to analyze excessively long trips, and to confirm no-shows in order to determine if they are meeting ADA requirements for the provision of service.
9. GRTA and KEI should investigate ways to improve on-time pickup performance. This may require more resources (drivers, vehicles, scheduling and dispatching tools) and/or improved techniques in scheduling and dispatching.
10. GRTA should establish a definition for on-time drop-offs. GRTA should develop a standard for drop-off performance.
11. GRTA should have KEI dispatchers record drop-off times when specified by riders. This information should be available to the dispatchers and drivers.
12. GRTA should adopt a specific on-board travel time standard consistent with other ADA paratransit systems.
15. GRTA should work with its contractors to adjust scheduling and dispatching practices to reduce the number and percent of trips with travel times that exceed the established maximum on-board travel time standard and are longer than comparable fixed route trips. When the actual travel times of 15 long ADA complementary paratransit trips (those with travel times of 60 minutes or more) provided between during December 2009 were compared with the estimated travel times for comparable fixed route/demand-response trips, travel times for six of the ADA paratransit trips (40 percent) were longer than comparable fixed route/demand-response travel times by an average of 33 minutes.

10 Resources

Section 27.133 (f) of the DOT ADA regulations (Capacity Constraints) recognizes that service quality can constitute a capacity constraint that limits the availability of service to ADA complementary paratransit-eligible riders. The review team collected and examined information about GRTA's resources to provide ADA complementary paratransit service including:

- Consumer input on driver performance and vehicle condition
- Input 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

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

10.1 Consumer Input

The June 2004 complaint filed with FTA cited the use of inaccessible vehicles for ADA complementary paratransit service and assignment of drivers who were not appropriately trained in wheelchair securement.

In the review team's telephone interviews with six ADA complementary paratransit riders, five of the six noted that a few of the drivers are less skilled in securement of a mobility device, careless in their driving, or preoccupied by their schedule.

For complaints on file with GRTA for the 12-month period of February 2009 to January 2010, there were three complaints categorized as "safety-driver" and "injury." These described separate incidents in which two wheelchairs overturned and another almost overturned owing to improper securement. Three complaints categorized as "safety-van" described a wet floor surface, an inoperative horn, and a non-functional securement strap.

Driver Comments

As noted in Chapter 9, 14 of 16 drivers interviewed by the review team remarked that vehicles are "okay but old." Three of these drivers mentioned vehicles breaking down a couple of times a month. One indicated that the handling is not good. Two drivers indicated that the vehicles are not in a good state of repair. However, nine drivers indicated that repairs are made promptly. One driver said that repairs take time, and one said that the maintenance team does their best. One driver suggested that more vehicles and an upgraded scheduling system would ease what he viewed as vehicle runs that were difficult to perform on a timely basis.

10.2 Vehicle Fleet and Vehicle Availability

Vehicle Age and Condition

GRTA uses 23 contractor-owned vehicles in the active fleet, ranging in model year from 1988 to 2008. At the time of the on-site review, the average age of the fleet was 13.8 years with a median age of 13 years. All but one vehicle—2008 Ford Champion—have exceeded their

expected service life. Each of the three contractors owns its vehicles. The fleet is a mix of mostly used buses acquired from other transit agencies or through the US Government Services Administration (GSA) fleet surplus. All vehicles are lift-equipped and all but two have space for two riders using wheelchairs; the other two have space for one rider using a wheelchair.

As shown in Table 10.1, KEI has nine vehicles, GST has six vehicles, and MHI has eight vehicles. While GST and MHI are jointly owned, their fleet operations remain separate. Every 3 months, the service mix is reassigned so the three contractors may be providing any combination of fixed route, demand-response and/or ADA complementary paratransit service. The vehicles that are typically used for ADA complementary paratransit service are noted in the table. The average age of these five vehicles is 8 years, which is higher than the average fleet ages of other transit systems providing ADA complementary paratransit service.

Table 10.1 – GRTA Fleet Summary

Operator	Year	Make	Model	Length	Capacity	Wheelchairs
KEI	1995	Blue Bird	QBRE 2903	29'	27	2
KEI	1995	Blue Bird	QBRE 2903	29'	27	2
KEI	1995	Blue Bird	QBRE 2903	29'	27	2
KEI	1997	Blue Bird	C1-FE 2509	25'	24	2
KEI	1998	Blue Bird	TSFE 2509	25'	27	2
KEI	1998	Blue Bird	TSFE 2509	25'	27	2
KEI	1998	Blue Bird	TSFE 2509	25'	27	2
KEI	1998	Blue Bird	C1-FE-2509	25'	20	2
KEI	1998	Blue Bird	QBRE 2903	29'	27	2
GST	1989	Gillig	Phantom	30'	30	2
GST	1989	Gillig	Phantom	30'	30	2
GST	1991	Gillig	Phantom	30'	36	2
GST	1995	El Dorado	MST280	28'	30	2
GST	2003	Ford	E350	Van	7	1
GST	2008	Ford	Champion	Cutaway	14	2
MHI	1988	Gillig	30/96TB	30'	30	2
MHI	1989	Gillig	30/96TB	30'	30	2
MHI	1989	Gillig	30/96TB	30'	30	2
MHI	1996	El Dorado	Aero 240	25'	21	2
MHI	1998	El Dorado	MST280M	28'	23	2
MHI	2001	Ford	E354	Van	8	1
MHI	2002	El Dorado	MST280M	28'	26	2
MHI	2002	El Dorado	Aero 240	Cutaway	17	2

Vehicles in **bold** are typically used for ADA complementary paratransit service

The current Monday through Saturday schedule for fixed route, ADA complementary paratransit, and demand-response services includes 15 morning and afternoon runs (requiring 15 vehicles), with each contractor operating five runs. Five of the 15 weekday runs are ADA complementary paratransit. The morning runs operate from approximately 5:30 a.m. until noon, with a 90-minute midday break. All three services resume at 1:30 p.m. All vehicles return to their respective garages at the midday break. On weekdays there are a total of eight spare vehicles available to GRTA; however, because each carrier is responsible for providing five

vehicles, GST only has one spare vehicle, while MHI has three and KEI has four. As needed, GST and MHI may rent vehicles from each other on a daily basis to provide GRTA service. Furthermore, the three contractors state that they give priority to ADA complementary paratransit service over demand-response. If they do not have five vehicles available during a day (or part of a day), they remove a vehicle from demand-response service to insure that all ADA complementary paratransit runs operate.

On Sundays, there are six runs, with each carrier operating two runs (and vehicles) in the morning and afternoon. Two of the Sunday runs are for ADA complementary paratransit service.

KEI manager, drivers, and riders all noted that the size of the vehicles used for ADA complementary paratransit service can make it difficult to maneuver along narrow streets and driveways and other private paths. As mentioned in Chapter 6, KEI visits the residences of new applicants to identify appropriate pickup and drop-off locations.

Many of the vehicles were purchased used either through GSA surplus contracts or from transit agencies that were retiring fleet vehicles. Because of the nature of the ongoing month-to-month GRTA procurements, there is little incentive for the contractors to purchase new buses. None of them has a fleet replacement plan in place. GRTA has been awarded \$921,000 in American Recovery and Reinvestment Act (ARRA) funds, which it expects to use to upgrade the fleet as part of a longer-term procurement for transit services.

The monthly Request for Quotation that GRTA has been using to procure all transit services includes a paragraph (#12) that allows GRTA staff to inspect contractor equipment.

10.3 Staffing and Operator Training

Driver Availability

At the time of the on-site review, the three contractors had a total of 46 drivers trained to provide ADA complementary paratransit service: 18 from KEI, 14 from GST, and 14 from MHI. The contractors use these drivers for all three GRTA services. If a driver assigned to ADA complementary paratransit service calls in sick, the immediate backup would be a driver assigned to demand-response service. Generally, each contractor provides backups for its drivers, but they also have the flexibility to cover for each other.

Based on the number of available drivers at the three contractors and their procedures in place to provide backups, there appear to be sufficient drivers for GRTA's ADA complementary paratransit service.

The median tenure of the KEI drivers was 6 years, 1 month; this is atypically high for an ADA complementary paratransit operation. In fact, the most junior driver had nearly 3 years of experience, while four drivers had worked for KEI at least 12 years. As discussed earlier, all drivers may be assigned to any of the three GRTA services. The median tenure of the GST and MHI drivers was slightly lower, each about four years.

Training

The Government of Guam requires that transit drivers receive 16 hours of initial training on ADA-related skills as well as four hours of refresher training each year (Public Law 29-19, subsection 3101.1.a). GRTA contractor bus drivers receive very thorough training on boarding

and securement skills, ADA, sensitivity to issues experienced by older adults and people with disabilities, and customer relations.

The CEDDERS program at the University of Guam provides training for all transit drivers employed by KEI, GST, and MHI. The chief instructor is certified by the Community Transportation Association of America (CTAA) to teach conduct the Passenger Service and Safety (PASS) course. The same training is given to fixed route, demand-response, and ADA complementary paratransit drivers, since they rotate periodically among these service modes. Dispatchers also receive the same training so they will have a better understanding of situations called in to them by drivers.

An extensive set of materials is provided to the trainees, including the CTAA PASS booklet and the Project ACTION *Transit Operator's Pocket Guide*. The curriculum includes classroom discussion of Project ACTION videos, the CTAA PASS training video, and course handouts. The course is divided into four segments of 4 hours each, as follows:

- Wheelchair Securement and Safety, including hands-on practice in boarding, securing mobility devices, and providing customer assistance
- Sensitivity Training, including disability awareness, understanding seizure disorders, and effective communication
- Passenger Assistance
- Passenger Relations, including ADA regulations and local regulations
- The training also includes emergency procedures, evacuation, and self-protection from bloodborne pathogens

CEDDERS gives written and oral examinations using CTAA examination materials. The annual report transmitted from CEDDERS to GRTA in November 2009 stated that 44 individuals were trained and certified as passing the examination in the previous year, and that 17 of the 19 personnel who completed training in 2009 had passed and were awaiting certification by CTAA.

As mentioned in Chapter 9, nine of the 16 drivers indicated that they felt the training they received was very helpful. Six drivers mentioned the sensitivity training as being particularly helpful. Another six drivers indicated that they received training on the operation of equipment, in particular the use of securements. When asked about refresher training, 14 of the 16 drivers indicated that they were aware of or had benefited from refresher training. Two drivers indicated that the refresher training was a repetition of the initial training, but three different drivers referred to new areas on emergency training and evacuations.

10.4 Run Coverage

GRTA ADA complementary paratransit service consists of five runs Monday to Saturday and two runs on Sunday. Collectively, KEI and its partners have sufficient vehicles and drivers to operate this level of service. Since ADA complementary paratransit service has priority over demand-response, the contractors have the discretion, if necessary, to temporarily reduce demand-response service to maintain the required level of ADA complementary paratransit service.

In the review team's analysis of the sample period (December 6–19, 2009), all ADA complementary paratransit runs took place as scheduled.

10.5 Other Resources

At the time of the on-site review, the GRTA staff consisted of five full-time professionals plus the Interim Executive Director—whose permanent position was Deputy Director, Department of Administration for the Government of Guam. The five full-time professionals collectively devoted about 1.5 full-time equivalents (FTEs) to ADA complementary paratransit. Their responsibilities covered eligibility determination, handling rider complaints, and processing the monthly contractor invoices.

One of the GRTA staff had the role of monitoring contractor service (all three modes), but had been on extended leave for several months at the time of the on-site review. During this time GRTA was not monitoring ADA complementary paratransit service, other than reviewing invoices and responding to complaints. There were no regular field observations of service or visits to the contractors' facilities.

At KEI, the office staff of dispatchers is cross-trained so that they are capable in all aspects of call taking, scheduling, and dispatching ADA complementary paratransit service.

At all three contractors, it appears that there are sufficient mechanics to ensure that there are enough vehicles to provide the current level of ADA complementary paratransit service.

As described in Chapter 7, neither GRTA nor KEI have a means of monitoring telephone performance. Based on review team observations, telephone capacity does not appear to be a capacity constraint.

10.6 Planning, Budgeting, and Funding

At the time of the on-site review, GRTA (and its predecessor, GMTA) had been using emergency procurements to contract for services since October 2003 (beginning of FY 2004). These procurements have each lasted one calendar month. As the time of the on-site review, legal issues, including the protest of a contract award by an unsuccessful bidder, had not been resolved. Furthermore, in 2009, the Government of Guam established the GRTA as the public entity responsible for providing public transportation. According to GRTA's Interim General Manager, the seats on the GRTA board had not been completely filled. Once that takes place, he expected that the board would issue an RFQ for a longer-term contract and have a multi-year contract in place by fall 2010.

In the monthly procurements since 2003, GRTA (and its predecessor, GMTA) had specified the number of vehicles and vehicle hours for each of the three services (fixed route, ADA complementary paratransit, and demand-response). Bidders could specify different costs per vehicle hour for each service. KEI, as the prime contractor, had bid different rates up to May 2008. Since June 2008, it had bid the same hourly rate for all three services. At the time of the on-site review (February 2010), its hourly rate was \$60, which had been held constant since February 2009. From July 2008 to January 2009, KEI's hourly rate was \$57.50.

The use of monthly procurements for an extensive period of time—rather than multi-year contracts—has likely led to higher costs for GRTA. First, with 1-month contracts, the incumbent contractor has not had the incentive to make investments that would lead to long-term savings. Second, the other private transportation firms on the island (there are several whose primary business is tourist transportation) have not had an incentive to compete, given the initial

investments that would be needed to provide GRTA service (e.g., obtain accessible vehicles, hire and train drivers and office staff) with no assurance of long-term work.

Operating Budgets

Table 10.2 presents GRTA's ADA complementary paratransit ridership and the operating budgets for FY 2007–2010 (3 months). The ridership from 2007–2009 was very stable. Approximately 90–93 of the budget was for contractor reimbursements with the remainder for GRTA salaries and benefits. The cost per trip has increased from 2007–2009 as KEI's hourly reimbursement rate has increased.

Table 10.2 – GRTA Ridership and Budgets: FY 2007–2010

Fiscal Year	Ridership	Approx. weekly trips	Budget	\$/Trip
2010 (3 months)	8,475	650	\$315,720	37.25
2009	37,181	715	\$1,536,300	41.31
2008	37,147	714	\$1,393,569	37.51
2007	37,772	726	\$1,088,261	28.81

In the monthly procurements, GRTA sets a maximum number of ADA complementary paratransit vehicle hours, based on five runs on Monday to Saturday and two runs on Sundays and holidays. This number of runs has not changed for several years. The Interim General Manager could not provide the basis for this volume of service other than this was the amount that the Government was willing to fund. There is no link between the ADA complementary paratransit budget and the estimated demand.

Both KEI and riders have requested additional vehicle hours, but the Government of Guam has not approved additional service for ADA paratransit, fixed route, or demand-response.

Capital Planning

Currently, GRTA has no capital budget for ADA complementary paratransit. Instead, it procures service on a turnkey basis (i.e., bidders are responsible for providing a facility, vehicles, vehicle maintenance, other equipment, and computer software and hardware).

In anticipated future procurements for services, GRTA intended to use an ARRA grant to purchase new vehicles. This would reduce service costs as bidders would not have to include amortization costs in their bids, and maintenance costs for these vehicles would be lower owing to a combination of some repairs being covered by warranties and overall fewer maintenance issues for newer vehicles. GRTA staff also indicated that under a long-term contract they intended for all the contractors to use government fuel pumps for GRTA vehicles. This would further reduce costs for the contractors.

10.7 Ridership

In 2009, GRTA provided a total of 37,181 paratransit trips. To compare this level of ridership with other transit systems, the review team used a national ADA complementary paratransit ridership model to estimate the predicted ADA complementary paratransit ridership in the GRTA ADA complementary paratransit service area.

The national model, developed by the Transportation Cooperative Research Program (TCRP) and detailed in *TCRP Report 119, Improving ADA Complementary Paratransit Demand*

Estimation, uses data from 28 transit systems across the country to model ADA complementary paratransit demand. The model estimates ADA complementary paratransit demand based on the population of the service area, the base fare charged, the percentage of the population with household incomes below the poverty level, the effective window used to determine on-time performance, the percentage of applicants found conditionally eligible, and whether conditional eligibility is used for trip-by-trip eligibility in operations.

To estimate demand for the GRTA ADA complementary paratransit area using this national model, the review team used the following data:

- Service area population: 154,805 (2000 U.S. Census data)
- Base ADA complementary paratransit fare: \$0.35
- Service area poverty rate: 23 percent (U.S. census data)
- Conditional eligibility rate: 76 percent
- On-time window: 20 minutes
- Trip-by-trip eligibility: not used

Using these factors, the TCRP model estimates the annual demand for ADA complementary paratransit service for GRTA paratransit to be 96,982 one-way trips. This is more than 160-percent higher than the GRTA ADA complementary paratransit ridership reported for 2009. A copy of the summary page from the model showing the estimation for the GRTA ADA complementary paratransit area is provided in Attachment M.

10.8 Findings

1. At the time of the on-site review, GRTA was not monitoring ADA complementary paratransit service other than reviewing invoices and responding to complaints. There were no regular field observations of service or visits to the contractor facilities.
2. Neither GRTA nor KEI have a means of monitoring telephone performance.

10.9 Recommendations

1. GRTA should focus efforts on acquiring newer vehicles for its ADA paratransit service. The median age of the five vehicles used most often for ADA complementary paratransit service is eight years. Four of the vehicles have exceeded their expected service life. Eight years is younger than the overall fleet age (median of 13.8 years), but still high for an ADA complementary paratransit fleet. Because of the nature of the ongoing month-to-month GRTA procurements, there is little incentive for GRTA's contractors to purchase new buses. None has a fleet-replacement plan in place.
2. GRTA should consider acquiring smaller vehicles for ADA paratransit service that are more suitable for the environment and conditions (i.e., narrow streets and confined spaces) in which they must operate.
3. GRTA should devote more staff time to monitoring paratransit service. This includes analysis of the data provided by the contractors, as well as firsthand observations on the road and at the contractor facilities.

4. GRTA should consider acquiring the technology to monitor telephone performance. In the interim, GRTA and KEI can have the local phone company conduct an analysis of telephone traffic and busy signals of the KEI lines used for the GRTA contract.
5. As its ADA complementary paratransit ridership increases, GRTA should consider acquiring specialized ADA complementary paratransit software to aid in scheduling, dispatching, and rider information. In addition, for any vehicle procurements, GRTA should consider incorporating AVL, on-board mobile data computers, and global positioning systems.
6. GRTA should place priority on developing and issuing a longer-term procurement for its ADA paratransit services.
7. In developing its budget for future ADA paratransit services, GRTA should develop objective, quantitative means for estimating the full demand for service.
8. Furthermore, GRTA should examine its current policies and practices to identify any constraints to full ADA paratransit demand.

Attachment A
GRTA Response to Draft Report



GUAM REGIONAL TRANSIT AUTHORITY

Government of Guam

Eddie M. Calvo, Governor
Raymond S. Tenorio, Lt. Governor
Feliberto R. Dungca Interim Executive Manager

P.O. Box 2896
Hagatna, GU 96932

Phone: (671) 475-4686 or 4616
Fax: (671) 475-4600



December 16, 2011

Ms. Britney Berry
Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590
(202) 366-0765

Dear Ms. Britney,

GRTA would like to thank you for allowing us to participate with the Office of Civil Right review. We have been already taking steps on resolving transit issues, The technical assistant provide by the OCR team has now created software which will ensure that our constituents receive the best transit services.

The Office of Civil Rights draft review report in its entirety not only addresses the transparent, integrity commitment, of what is truly the check and balance of the GRTA's administration and the service providers. As we all move towards effectively supporting, maintaining, mainstreaming, and serving our constituent island wide. And find more ways to improve its GRTA services.

Again, we would like to thank your team's visit and taking their time to assist both GRTA and the service provider. We welcome the U.S Office of Civil Rights to review the GRTA administration, operations, and maintenance facility, again in the future.

Please feel free to contact our office at (671) 475-4603, if you or your team should have any other comments and concerns. Again, thank you very much and have a good day.

/S/

Felixberto R. Dungca
Interim, Executive Manager
Guam Regional Transit Authority

Attachment B
FTA Notification Letter



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

Headquarters

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

December 22, 2009

Mr. Joseph C. Manibusan
Interim Executive Director
Guam Regional Transit Authority
Government of Guam
P.O. Box 2896
Hagatna, Guam 96932

Dear Mr. Manibusan:

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the Americans with Disabilities Act of 1990 (ADA) and the Department of Transportation's (DOT) implementing regulations at 49 CFR Parts 27, 37, and 38, as they relate to public transportation. As part of our ongoing oversight efforts, FTA's Office of Civil Rights conducts a number of on-site compliance reviews of ADA complementary paratransit services and fixed route lift maintenance and reliability. Guam Regional Transit Authority's (GRTA/DOA) public transportation service has been selected for one ADA complementary paratransit review and one fixed route lift maintenance and reliability review. **We are requesting Tuesday, February 9 through Friday, February 12, 2010 for the paratransit review and Tuesday, February 16 through Friday, February 19, 2010 for the fixed route review.**

The focus of the paratransit review will be GRTA/DOA's compliance with the six paratransit service criteria outlined in the DOT ADA regulations at 49 CFR § 37.131.

The focus of the fixed route lift maintenance and reliability review will be GRTA's/DOA's compliance with the DOT ADA regulations applicable to the maintenance, reliability, and usage of accessibility equipment. Section 37.161 mandates that transit service providers maintain in operable condition features required to make vehicles readily accessible by individuals with disabilities. When accessibility features are out of order, they must be promptly repaired. Such features include, but are not limited to, wheelchair lifts. Additionally, Section 37.165 addresses the use of wheelchair lifts and securements. These are some, but not all, of the regulations that you are required to meet to be in compliance with the ADA and implementing regulations.

The overall review process will consist of the collection of data prior to the visit, an opening conference for each review, an on-site review of GRTA/DOA's paratransit and fixed route service, and an exit conference for each review. The entire on-site portion of the review will be completed within two weeks. FTA has engaged the services of Planners Collaborative, Inc. (PCI), of Boston, MA, assisted by TranSystems of Medford, MA to conduct the compliance reviews. Representatives of PCI and TranSystems and FTA will participate in the opening and

exit conferences. Ms. Susan Clark, the Program Manager for this compliance review, has already contacted your organization to notify you of the on-site visit and has confirmed **Tuesday, February 9, 2010**, for commencement of the on-site visit for the ADA complementary paratransit review and **Tuesday February 16, 2010**, .

We request **9 a.m.** for the opening conference for each of the two reviews (Tuesday February 9 and Tuesday February 16, 2010, respectively). This will provide an opportunity for an introduction of the FTA representatives and PCI and TranSystems reviewers to members of your organization, including you or your designee, the paratransit service manager, the ADA coordinator, and other key staff. During the opening conference, team members from PCI and TranSystems will present an overview of the on-site review.

Because the members of the review team will be spending considerable time reviewing GRTA/DOAs paratransit and fixed route services, it would be helpful if you could provide them with temporary identification to permit easy system access. We also request that you identify a DOA staff contact to coordinate the on-site review and address questions that may arise during the review. In addition, we request that a work area be made available to the team in the building where the opening and exit conferences take place.

In order that we may properly prepare for the on-site visit, we request that you provide the information outlined in Enclosures 1-3. Enclosure 1 consists of items that must be received within 21 calendar days of the date of this letter for the paratransit review. These materials should be forwarded to:

David Chia
Planners Collaborative, Inc.
122 South Street
Boston MA 02111
617-338-0018 x17
617-338-4228 fax
dc@thecollaborative.com

Enclosure 2 consists of items that will be needed at the initiation of the ADA complementary paratransit review while the review team is on site.

Enclosure 3 consists of items that must be received within 21 calendar days of the date of this letter for the fixed route review. These materials should be forwarded to:

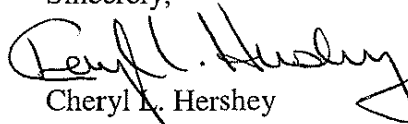
James Purdy
Planners Collaborative, Inc.
122 South Street
Boston MA 02111
617-338-0018 x187
617-338-4228 fax
dc@thecollaborative.com

We request that the exit conference for each review be scheduled for **2 p.m. Friday, February 12, 2010 and Friday February 19, 2010 respectively**. This conference will afford an opportunity for the reviewers to discuss their observations with you and your organization. We request that you or your designee, the GRTA/DOA paratransit service manager, the ADA coordinator, and other key staff attend the exit conference. Findings will be made by the FTA Office of Civil Rights and provided to you in a written draft at a future date. You will then have an opportunity to provide comments before the report becomes final. When the report is transmitted to GRTA/DOA in draft form, it will be a public document and subject to the Freedom of Information Act upon request.

GRTA/DOA staff are welcome to accompany the review team during both reviews, if you so choose. We welcome your suggestions and encourage your participation in the review by asking questions or commenting on any issues you may feel are relevant. If you have any questions or concerns prior to the opening conference, please contact Susan Clark at 202-493-0511 or at her e-mail address: sue.clark@dot.gov. You may also contact David Chia and Jim Purdy, whose contact information is listed above.

Thank you for your assistance and cooperation as we undertake this process together. We look forward to a meaningful and successful review.

Sincerely,



Cheryl L. Hershey
Director

FTA Office of Civil Rights

Enclosures

cc: Leslie T. Rogers, FTA Region IX Administrator
Derrin Jourdan, FTA Region IX Civil Rights Officer
Nadeem S. Tahir, FTA Region IX Director of Program Management & Oversight

:

Enclosure 1

The following information must be submitted to Planners Collaborative, Inc. **within 21 calendar days from the date of this letter.**

1. A description of how the ADA complementary paratransit service is structured and provided, including:
 - How trip requests/reservations are handled (by a central reservation office? by each carrier?), and the address(es) where reservations are taken.
 - How trips are scheduled (by a central scheduling office? by each carrier?) and the address(es) where scheduling is done.
 - How dispatching is handled (centrally? by each carrier?) and the address of the central dispatch office or the carrier dispatch sites).
2. A copy of the current broker and carrier contract(s), if service is contracted out in part or in total.
3. A copy of your ADA complementary paratransit "Operator Manual" (or copies if each carrier uses their own), and copies of your "Rider Handbook," service brochure, or other document that explains how trips are requested and service is provided.
4. A description of ADA complementary paratransit service standards, including:
 - The on-time performance standards (how is "on-time" defined and what is the goal for their percentage of trips provided within the standard?).
 - What standards have been set regarding acceptable numbers or percentages of trip denials?
 - The travel time standard (what travel time is considered comparable or too long and what is the goal for the percentage of trips provided within this standard?).
5. Telephone call-handling standards (what is the standard for hold time and/or call pickup and what is the goal for their percentage of calls within this standard?).
6. Samples of driver manifests as identified in Item 1 of Enclosure 2 in this correspondence and samples of records or reports or tabulations of the information requested in Item 2 of Enclosure 2.
7. Capital and operating budget and expenditures for ADA complementary paratransit services for the three most recent fiscal years, including the current year.
8. The number of ADA complementary paratransit trips served and trips denied for the three most recent fiscal years, including the current year.
9. Three copies of the system map for fixed route services.

Enclosure 2

We request that the following information and/or assistance be available at the beginning of the on-site visit.

1. Copies of completed driver manifests for the most recent six-month period (for each carrier).
2. The following ADA complementary paratransit data, by month, for the last six months (paper copies as well as in electronic format, if available):
 - Trips requested
 - Trips scheduled
 - Trips denied
 - Canceled trips
 - No-shows
 - Missed trips
 - Trips provided
 - A breakdown of trips requested, scheduled, and provided by carrier / provider.
 - A listing of trips denied each month showing customer's name, origin, requested destination, day and time, and if the person was ambulatory or uses a wheelchair.
 - On-time performance information (by carrier if there are multiple carriers in the system).
 - List of trips that exceeded 60 minutes showing the customer name, origin, destination, day and time, if the person was ambulatory or uses a wheelchair; and the total time on-board.
 - List of passenger no-shows and carrier missed trips with negotiated pickup times and actual vehicle arrival and departure times
 - Telephone call management records (if available) showing hold times by hourly or half-hourly periods and day, total call volume, calls answered and abandoned.
3. A list of complaints related to ADA complementary paratransit capacity constraints in the past year. The list should include all complaints related to trip denials, trip limits, on-time performance, lengthy trips, phone capacity issues, etc. showing customer's name, trip origin, date and type of complaint, carrier, and resolution (any corrective actions requested and taken).
4. The following eligibility information:
 - Copy of application form
 - Eligibility guidelines and any assessment or interview forms
 - Samples of all letters of determination
 - Other letters related to incomplete applications, appeals, and other eligibility issues
 - Total number of individuals registered for ADA complementary paratransit service
 - Most recent 12 months of data:
 - Applications received
 - Completed applications
 - Unconditional eligibility
 - Conditional eligibility
 - Temporary eligibility
 - Not eligible

- Any documentation and correspondence related to no-show suspensions
 - Access to eligibility files and appeals records
5. Work shift assignments for reservationists (call-takers), schedulers, and dispatchers
 6. Access to personnel records showing date of hire and termination for reservationists (call-takers), schedulers, dispatchers, drivers, and road supervisors
 7. Current paratransit fleet roster with vehicle type, accessible spaces, model year, and odometer reading.
 8. Access to most recent six months of daily vehicle pull-out records showing late pull-outs and closed runs.
 9. Vehicle availability reports for most recent six months.
 10. Copies of vehicle pre-trip inspection form and preventative maintenance form.
 11. Assistance with viewing and capturing parameters used in scheduling software.
 12. Assistance with viewing and collecting data on vehicle run structures and peak pull-out requirements.

Enclosure 3

We request that the following information be submitted to Planners Collaborative within 21 calendar days from the date of this letter.

1. Five copies of the most recent system route map.
2. A complete set of current detailed route schedules.
3. Identification of which routes are operated directly by the NJ TRANSIT and which are operated by a private contractor.
4. Identification of which routes/areas are served by each garage.
5. Identification of transfer points and locations where different routes share a common line.
6. Bus fleet inventory identifying year, make, bus garage, and accessibility of each bus, including whether the system uses low-floor buses and to what extent.
7. A description of lift maintenance practices identifying the location and party performing lift maintenance.
8. Current Fixed Route Operator Manual/s, notices, bulletins, memoranda, or other documentation informing vehicle operators of lift operation and maintenance policies.
9. Reports, memoranda, or other documentation regarding lift operation and maintenance monitoring activities and findings.
10. A list of complaints related to lift operations in the past year. The list should include customer's name, trip origin, date and type of complaint, carrier, and resolution (any corrective actions requested and taken).

Attachment C

On-Site Review Schedule

**ADA Complementary Paratransit Service Review
Guam Regional Transit Authority (GRTA), Hagatna, GU
February 9-12, 2010**

Time	Activity	Who	Where
Tuesday, February 9, 2010			
9 a.m.	➤ Opening Conference	All	GRTA
9:30 a.m.	➤ Review information requested and policies & procedures with GRTA and Kloppenburg (KEI) managers	All	
10:30 a.m.	➤ Review complaints ➤ Review budget and resources ➤ Review eligibility process and records	Purdy Chia Gerty	
1:30 p.m.	➤ Interview driver trainer ➤ Tour KEI facility	Purdy Chia, Gerty	Univ. of Guam KEI
2 p.m.	➤ Review contractor staff and resources	Chia, Gerty	
3 p.m.	➤ Conduct trip length analysis ➤ Observe call-takers; record trip request information	Gerty Purdy, Chia	
Wednesday, February 10, 2010			
8 a.m.	➤ Analyze on-time performance; no-shows ➤ Observe call-takers; record trip request information	Chia Purdy, Gerty	KEI
10 a.m.	➤ Review telephone system and performance ➤ Analyze service area, hours and fares ➤ Interview scheduler	Chia Purdy Gerty	
11 a.m.	➤ Continue review of eligibility process and records ➤ Interview Drivers	Gerty Chia, Purdy	GRTA Sanko, MHI 360 Chalan Pasaheru, Route 10a, Tamuning
1 p.m.	➤ Continue analysis of on-time performance ➤ Continue review of paratransit complaints ➤ Conduct trip length analysis	Chia Purdy Gerty	KEI
3 p.m.	➤ Observe dispatch	Purdy, Gerty	
Thursday, February 11, 2010			
8 a.m.	➤ Review schedules; pull-out and fleet ➤ Observe dispatch	Chia Purdy, Gerty	KEI
10 a.m.	➤ Interview drivers	Purdy, Chia	Sanko, MHI
Afternoon	➤ Continue follow-up interviews and analysis	All	
Friday, February 12, 2010			
Morning	➤ Complete preliminary data analysis ➤ Prepare materials for debriefing session	All	KEI
2 p.m.	➤ Exit Conference	All	GRTA

Attachment D

Consumer Interview Questions

ADA Complementary Paratransit Service Review Rider/Customer Interview

Agency or Individual GRTA

Contact Person at Agency _____

Phone Number _____

1. Does it take a long time on the telephone getting to a trip reservationist? _____

2. Do you get reservations on the 1st call, or are you ever wait-listed? _____

3. Do you get the pickup time you want, or do you have to negotiate a time? **Can you ask for a drop-off time?**

4. Does the driver arrive at the pickup point when he or she should? _____

5. Does the driver always know the proper address and how to get there? _____

6. Does the driver get you to your destination on time? _____

7. Are your trips sometimes excessively long (say, over 1 hour)? _____

8. Did you have any problems becoming eligible for the service? _____

9. Were you notified of your eligibility or non-eligibility within 21 days of your application?

10. Are the drivers courteous, respectful and helpful? _____

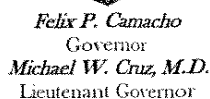
11. Were any complaints you made to the proper authorities handled to your satisfaction? ____

Please feel free to extend your answers or make additional comments.

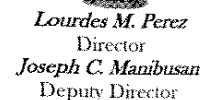
Date

Interviewer

Attachment E
GRTA Complaint Form



P.O. Box 884, Hagatna, Guam 96932
Tel: (671) 475-4686/4616/4620/4603 Fax: (671) 475-4600



1. Name (Complainant):	2. Phone:	3. Home address (street number, city, state, zip code):
4. If applicable, name of person(s) who allegedly discriminated against you:		
5. Location and position of person(s) if known:		6. Date of alleged incident:
7. Discrimination because of: <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input type="checkbox"/> Race / color</div> <div style="width: 33%;"><input type="checkbox"/> Sex (includes sexual harassment)</div> <div style="width: 33%;"><input type="checkbox"/> Vietnam Era Veteran</div> <div style="width: 33%;"><input type="checkbox"/> National origin</div> <div style="width: 33%;"><input type="checkbox"/> Sexual orientation</div> <div style="width: 33%;"><input type="checkbox"/> Disabled Veteran</div> <div style="width: 33%;"><input type="checkbox"/> Creed / religion</div> <div style="width: 33%;"><input type="checkbox"/> Marital status</div> <div style="width: 33%;"><input type="checkbox"/> Retaliation</div> <div style="width: 33%;"><input type="checkbox"/> Disability</div> <div style="width: 33%;"><input type="checkbox"/> Age</div> </div>		
8. Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Also, attach any written material pertaining to your case.		

PLEASE COMPLETE SHEET 2 OF THIS FORM
Sheet 1 of 2

ADDITIONAL INFORMATION:

9. Why do you believe these events occurred?

10. What other information do you think is relevant to the investigation?

11. How can this/these issue(s) be resolved to your satisfaction?

12. Please list below any person(s) we may contact for additional information to support or clarify your complaint (witnesses, fellow employees, supervisors, others):

Name:

Job title:

Address:

Phone number:

Signature:

Date:

Attachment F
Application for ADA Complementary Paratransit



GUAM REGIONAL TRANSIT AUTHORITY
Government of Guam

Felix P. Camacho, Governor
Michael W. Cruz, MD, Lt. Governor
Joseph C. Manibusan, Interim Executive Manager

P.O. Box 2896
Hagatna, GU 96932

Phone: (671) 475-4686 or 4616
Fax: (671) 475-4600



January 29, 2010

Dear Customer:

Hafa Adai! Thank you for inquiring about the Guam Regional Transit Authority's (GRTA) "ADA Paratransit" service. Enclosed is GRTA's "ADA Paratransit Application Form". **Please read all the enclosed material carefully before completing the application form.**

GRTA's "ADA Paratransit" service is provided to individuals who, because of a **disability**, are **prevented** from using our standard Guam Public Transit System (Fixed Route and Demand Response Services). This might include being unable to get to or from bus stops, being unable to get on or off buses, or being unable to understand how to ride and use the system.

GRTA will provide paratransit service to person's determined "ADA Paratransit Eligible" for those trips that cannot be made using the Guam Public Transit System. You may, for example, be able to use the Guam Public Transit System for some trips if stops are nearby and there are no barriers which prevent you from getting to and from the bus. At other times, you might not be able to get to and use the bus. ADA paratransit service is meant to assist you at these times.

There are two (2) types of ADA Paratransit eligibility. These are:

- **Unconditional** – this eligibility is granted if your disability prevents you from using the Guam Public Transit System for all trips that you might need to make.
- **Conditional** – this eligibility is granted if you can use the Guam Public Transit System buses under certain circumstances, but need GRTA's Paratransit Service for certain trips.

To enable us to accurately determine your eligibility for this service, please fill out the enclosed application form **as completely and thoroughly as possible**. The questions are meant to determine the specific limitations you have in using the Guam Public Transit System. They are also meant to determine **when and under what circumstances you can use the Guam Public Transit System buses or when GRTA's Paratransit Service is required**.

After you have completed Parts 1 – 6 please have a Guam licensed physician complete Part 5 of the application form. The physician's statement may certify your disability but does not necessarily determine your eligibility for GRTA's Paratransit service. It is important that all sections of the application form are complete. **If any sections are left blank, the form will be returned to you.**

Information about your disability which you provide in the application will be kept **strictly confidential**.

If you need assistance in completing the form, or have questions about GRTA's ADA Paratransit service and eligibility, please feel free to contact our office at:

671-475-4686 (Voice)
671-475-4600 (Facsimile)

Material is also available in large print, and can be provided in another format if needed. Just call and let us know the format you require.

Completed applications will be processed within twenty-one (21) calendar days of receipt. You will be notified in writing of your eligibility for GRTA's ADA Paratransit service. If you have not heard from us in twenty-one (21) days, please call and we will provide you with paratransit service until your application is processed. Please note that in some instances, we may not be able to determine your eligibility without further information. In this case, we may ask you to schedule an in-person assessment to allow us to better understand your disability and transportation needs.

If you are determined to be eligible for GRTA's "ADA Paratransit" service (either unconditional or conditional), a "Riders Guide", which provides information about the service and how to use it will be sent to you at the address provided in your application. Customers must **provide GRTA with two (2) color I.D. size (1 ½ by 1 ½) photos** in order to receive your GRTA ADA Paratransit riders card.

If it is determined that you are able to use the Guam Public Transit System and therefore are not eligible for GRTA's ADA Paratransit Service, we will notify you in writing of the exact reasons for this determination.

Sincerely,

/S/
JOSEPH C. MANIBUSAN
Interim Executive Manager

Attachments

**ADA
PARATRANSIT
SERVICE**

**GUAM PUBLIC TRANSIT SYSTEM
ADA PARATRANSIT ELIGIBILITY
DETERMINATION**

GUAM REGIONAL TRANSIT AUTHORITY (GRTA)

In compliance with the Americans with Disabilities Act of 1990 (ADA), the Guam Regional Transit Authority provides "ADA Paratransit" service to anyone with a disability who is determined eligible for GRTA's ADA Paratransit Service. **The GRTA's ADA Paratransit Service is intended only for those trips that a person cannot make on the Guam Public Transit System.** This application form is intended to determine when and under what circumstances the applicant can use the GRTA's ADA Paratransit Service and when GRTA's ADA Paratransit Service is required. Before completing this application form, please read the enclosed letter which describes eligibility for GRTA's ADA paratransit service in more detail.

INSTRUCTIONS FOR COMPLETING THIS FORM:

Be sure to read the enclosed letter before you complete this form.

The applicant (or someone assisting the applicant) must complete **PARTS 1-6**. A Guam licensed physician must complete **PART 7** and sign the **MEDICAL CERTIFICATION** section(s).

All questions must be answered. Incomplete forms will be returned.

Provide GRTA with two (2) color I.D. size (1 ½ by 1 ½) photos.

Copies of this form are available in large print and other accessible format upon request.

If you have any questions or need assistance completing this form, call GRTA's ADA Paratransit Administrator at 671-475-4686/4616 (Voice) or 671-475-4600 (Facsimile).

WHEN COMPLETED, PLEASE RETURN THE ENTIRE FORM TO:

**GUAM REGIONAL TRANSIT AUTHORITY
ATTN: Paratransit Administrator
P.O. Box 2986
Hagatna Guam 96932**



PART 1. GENERAL INFORMATION

For Official Use Only:

Type: New Renewal Replacement

I.D. Number: _____

Date Issued: _____

Last Name: _____ First Name: _____ MI: _____

Mailing Address: _____ Zip Code: _____

Home Address: _____ Apt. /Bldg. No.: _____

Telephone No.: (Home) _____ (Work) _____

Social Security No.: _____ Date of Birth: _____

Weight: _____ Height: _____ Hair Color: _____ Eye Color: _____

If someone assisted you in completing this form, please identify them below:

Name: _____ Phone No.: _____

Do you need to have information and material given to you in any of the following ways
(check all that you need):

☐ Large Print ☐ Audio Tape ☐ Braille ☐ Other: _____

Please give us the name and telephone number of someone we can call in an
emergency.

Name: _____ Phone No.: _____

Relationship: _____

PART 2. APPLICATION CERTIFICATION

Please indicate below the reason(s) why you are seeking ADA paratransit eligibility (check all that applies):

- ☐ I can use the Guam Public Transit System (Fixed and Demand Response) to go some places, but in other places I cannot get to or from the bus stop.
- ☐ I can use the Guam Public Transit System sometimes, but only if buses are equipped with wheelchair lifts.
- ☐ Because of my disability, I can never use the Guam Public Transit System.

I understand that the purpose of this evaluation form is to determine if there are times when I cannot use the Guam Public Transit System provided by the Guam Regional Transit Authority and must therefore use the GRTA's Paratransit Service. I understand that the information about my disability contained in this application will be kept confidential and shared only with professionals involved in evaluating my eligibility to use the GRTA's Paratransit Service. I certify that, to the best of my knowledge, the information in this evaluation form is true and correct. I understand that providing false or misleading information could result in my eligibility status being re-examined as well as other actions deem necessary by the Guam Regional Transit Authority.

Applicant's Signature: _____ Date: _____

PART 3. INFORMATION ABOUT THE APPLICANT'S DISABILITY

1. What type or types of disabilities prevent you from using the Guam Public Transit System (Fixed Route or Demand Response – Check all that apply):

- | | |
|---|--|
| <input type="checkbox"/> Physical Disability | <input type="checkbox"/> Visual Impairment/Blindness |
| <input type="checkbox"/> Developmental Disability | <input type="checkbox"/> Mental Illness |
| <input type="checkbox"/> Other | <input type="checkbox"/> None |

Please describe your disability in more detail: _____

2. Is the disability described above temporary or permanent?

- ☐ Temporary, I expect it to last for another _____ months.
- ☐ Permanent
- ☐ Controlled with medication.
- ☐ I don't know.

3. Please indicate below if you use any of the following mobility aids or equipment.

- | | | |
|--|--|---|
| <input type="checkbox"/> Cane | <input type="checkbox"/> Long White Cane | <input type="checkbox"/> Leg Braces |
| <input type="checkbox"/> Crutches | <input type="checkbox"/> Walker | <input type="checkbox"/> Picture Board |
| <input type="checkbox"/> Alphabet Board | <input type="checkbox"/> Manual Wheelchair | <input type="checkbox"/> Powered Wheelchair |
| <input type="checkbox"/> Powered Scooter | | <input type="checkbox"/> Prosthesis |
| <input type="checkbox"/> Other: _____ | | |
| <input type="checkbox"/> Service Animal (describe): _____ | | |
| <input type="checkbox"/> I don't use any of the above aids or equipment. | | |

Note: We may not be able to accommodate you if your wheelchair/scooter is longer than 48" or wider than 32" or if your total weight with your wheelchair is more than 600 pounds.

4. Do you require the assistance of a Personal Care Attendant (someone who assists you with daily life functions when you travel)?

- ☐ Yes, I need assistance: ☐ Always ☐ Sometimes

Name of Personal Care Attendant: _____
(PRINT)

- | | | | |
|-------------------------------------|--------------------------------------|---------------------------------|------------------------------------|
| <input type="checkbox"/> Mobility | <input type="checkbox"/> Reading | <input type="checkbox"/> Eating | <input type="checkbox"/> Transfers |
| <input type="checkbox"/> Medication | <input type="checkbox"/> Other _____ | | |

- ☐ No, I do not need assistance.

PART 4. QUESTIONS ABOUT USING THE GUAM PUBLIC TRANSIT SYSTEM



5. Have you ever used the Guam Public Transit System?

- ☐ YES, I typically use the Guam Public Transit System _____ times a week.
- ☐ YES, I used to but stopped because _____
- ☐ NO

6. Is there something that might help you ride the buses (check all that apply)?

- ☐ YES, route and schedule information
- ☐ YES, learning to use the buses
- ☐ YES, being able to get buses with lifts
- ☐ YES, a communication aide
- ☐ YES, if bus stops were closer to where I live and where I need to go
- ☐ YES, (describe): _____
- ☐ NO, none of these would help



7. Can you ask for and follow written or oral instructions to use the Guam Public Transit System?

- ☐ YES
- ☐ NO 
- ☐ SOMETIMES 
- ☐ I don't know because I have never tried to use the buses.

If NO or SOMETIMES, please check all that applies:

- ☐ I get too confused and might get lost.
- ☐ Other people cannot understand me.
- ☐ I probably could with instruction.
- ☐ Other: _____

8. Are you able to get to and from bus stops on your own?

- ☐ YES
- ☐ NO 
- ☐ SOMETIMES 
- ☐ I don't know because I have never tried.

If NO or SOMETIMES, please check all that apply:

- ☐ I can't get places if there are no curb-cuts.
- ☐ I can't if the street or sidewalk is too steep.
- ☐ I can't cross busy streets & intersections.
- ☐ I can't travel outside when it is too hot.
- ☐ I can't find my way at night because of a vision problem.
- ☐ I get confused and can't find my way.
- ☐ I probably could with instruction.
- ☐ I feel unsafe traveling alone.
- ☐ Other: _____

9. Under the best of conditions, How far can you walk outdoors (or travel using a mobility aid) without the help of another person?

- ☐ I can get to the curb in front of my house/apartment.
- ☐ I can travel up to three (3) blocks (1/4 mile).
- ☐ I can travel up to six (6) blocks (1/2 mile).
- ☐ I can travel up to nine (9) blocks (3/4 mile).
- ☐ I am unable to travel outside my house/apartment.

10. Can you wait up to thirty (30) minutes for a Guam Public Transit System bus?

- ☐ YES
- ☐ YES, but only if the stop has a bench and shelter.
- ☐ YES, but I don't like to wait that long.
- ☐ NO (explain): _____

11. Can you get on and off a
Guam Public Transit System bus?

- ☐ YES
- ☐ NO
- ☐ SOMETIMES
- ☐ I don't know because
I have never tried.



If NO or SOMETIMES, please check all that apply:

- ☐ Only if the bus has a wheelchair lift
- ☐ I can't climb the stairs.
- ☐ I don't want to use the lift.
- ☐ I probably could with instruction.
- ☐ Other: _____

12. If you are able to get on and off the Guam Public Transit System bus, can you get to a seat or wheelchair position by yourself and ride the bus?

- ☐ YES
- ☐ NO
- ☐ SOMETIMES
- ☐ I don't know because
I have never tried.



If NO or SOMETIMES, please check all that apply:

- ☐ I need someone to help me.
- ☐ I have a balance problem.
- ☐ I have trouble finding a seat.
- ☐ I need the seat nearest the door.
- ☐ Other: _____

13. If you are able to get on and off Guam Public Transit System buses, do you know where to get off the bus, or can you find out by yourself?

- ☐ YES
- ☐ NO
- ☐ SOMETIMES
- ☐ I don't know because I have never tried.

Please check all that apply:

- ☐ I get confused and can't remember where I am going.
- ☐ I can if the driver calls out the stops.
- ☐ I probably could with training.
- ☐ Other: _____

14. Are there any other conditions which limit your ability to use the Guam Public Transit System buses?

- ☐ YES (Please describe them below):

- ☐ NO

PART 5. CURRENT TRAVEL INFORMATION

15. Please give us information about where you go and how you get there now.

List the three (3) places you go most often

(1)Where do you go? _____

Address: _____

How often do you go there? _____

How do you get there? _____

(2)Where do you go?_____

Address:_____

How often do you go there?_____

How do you get there?_____

(3)Where do you go?_____

Address:_____

How often do you go there?_____

How do you get there?_____

PART 6. INFORMATION ABOUT TRAVEL TRAINING (Survey-Data collection purpose only)
--

NOTE: Travel training is personal (one-to-one) instruction that teaches an individual how to use the Guam Public Transit System buses.

16. Have you ever had any personal instruction on riding the Guam Public Transit System?

- ☐ NO, I have not received any personal instruction.
- ☐ YES, I received personal instruction from:_____
- ☐ YES, I received personal instruction from a friend/relative.

Indicate below all of the skills you learned:

- ☐ To travel to and from the bus stop.
- ☐ To cross streets.
- ☐ To ride on the following routes (please list them):
Route:_____ Route:_____ Route:_____
- ☐ Reading bus schedules and planning trips.
- ☐ Other:_____

Did you complete the above described instruction? ☐ YES ☐ NO

17. Please draw a map below to your residence. A transit inspector will be by to assess your area for bus access. (Note: Buses are not allowed to enter non-paved roads and single narrow access roadways.)

NAME: _____ PHONE NO.: _____

HOME ADDRESS: _____

THIS ENDS THE PORTION OF THE FORM TO BE COMPLETED BY THE APPLICANT. THE LAST SECTION (ON THE FOLLOWING PAGES) MUST BE COMPLETED BY A GUAM LICENSED PHYSICIAN.

PART 7. MEDICAL CERTIFICATION
(To be completed by a licensed physician)

The Americans with Disabilities Act of 1990 (ADA) requires that the Guam Regional Transit Authority (GRTA) provide "ADA Paratransit" service to anyone with a disability **who cannot use standard Guam Public Transit System (Fixed Route and Demand Response services)** services and who is traveling within a ¾ mile area served by fixed route service. The applicant who requests you to review and sign this form is applying at GRTA to be considered eligible for this service. GRTA's ADA paratransit service is intended only for those trips on the Guam Public Transit System that the person cannot access.

This application form is intended to determine ***when and under what circumstances the applicant can use GRTA's Guam Public Transit System – Paratransit Service.***

Please carefully review all the information provided by the applicant in PARTS 2-4 of this form and then complete all the appropriate "Attachments" below:

- (a) Please complete all the appropriate assessment forms that best describes the physical and/or cognitive conditions which functionally prevents the applicant from using standard Guam Public Transit System (Fixed Route and/or Demand Response Services):

Attachment A: Applicants with Cognitive Disabilities

Attachment B: Applicants with Psychiatric Disabilities

Attachment C: Applicants with Vision Disabilities

Attachment D: Applicants with Seizure Disorders

Attachment E: Applicants with Physical Disabilities

- (b) To the best of your knowledge, is the information provided by the applicant in PARTS 2-4 of this application form true and correct?

ATTACHMENT A
Applicants with Cognitive Disabilities

Name of Applicant: _____

Name of Licensed Physician: _____

Date Completed: _____

1. In what capacity do you know the applicant?

2. How long have you known or worked with the applicant?

3. When did you last see the applicant? _____

4. Comments about the applicant's stated disability and level of cognitive ability?

5. Does the applicant have any specific behavioral problems?

☐ YES ☐ NO

If YES, _____

6. Does the applicant travel alone at times? If so, where? _____

7. What abilities does the applicant have to follow directions to make a trip? _____

8. What abilities does the applicant have to understand time and follow a schedule to get places on time? _____

9. What abilities does the applicant have to know when he/she is lost? _____

10. What abilities does the applicant have to get help if he/she is lost? _____

11. What ability does the applicant have to cross a street safely? _____

12. Comments about the applicant's stated ability to travel alone. _____

13. Comments about skills related to functional abilities to travel: Orientation to person, place and time. _____

14. Comments on applicant's judgment and safety skills related to traveling alone. _____

15. Comments on problem solving and insight skills. _____

16. Comments on short and long-term memory. _____

17. Comments on concentration (focus attention). _____

18. Comments on ability to seek and act on direction. _____

19. Comments on ability to process information. _____

20. Comments on consistency (the ability to maintain a particular standard or repeat a particular task with minimal variation). _____

21. Comments on ability to communicate needs. _____

22. Comments on behavioral skills. _____

23. Comments about the applicant's related physical skills that may affect travel (i.e. walking stability-gait, balance; physical stamina-endurance, or seizures.) _____

PLACE LICENSE PHYSICIAN OFFICIAL STAMP BELOW:

Signature: _____ Date: _____

Print Name and Title: _____

Current Guam Medical License No.: _____

Business Address: _____

Mailing Address: _____

Telephone No.: _____ Fax: _____

ATTACHMENT B
Applicants with Psychiatric Disabilities

Name of Applicant: _____

Name of Licensed Physician: _____

Date Completed: _____

1. In what capacity do you know the applicant?

2. How long have you known or worked with the applicant?

3. When did you last see the applicant? _____

4. What is the formal diagnosis of the applicant's disability (DSM-IV or other)?

5. What was the date of onset?

6. What is the prognosis? _____

7. Is the applicant taking any psychotropic, antidepressant or other medication(s) prescribed by you?

☐ YES

☐ NO

Comments: _____

8. If YES, please list the type, frequency, dose, and any comments about how the medication(s) may complicate the individual's independent mobility in the community.

Medication Type	Dosage	Effect on Functional Ability (if any)

9. If the applicant takes his/her medication compliantly, will he/she be able to travel independently in the community?

☐ YES

☐ NO

☐ NA

Comments: _____

10. Do you deem the applicant to be compliant in taking prescribed medication?

☐ YES

☐ NO

☐ NA

Comments: _____

11. Is there anything about the use of medication that would complicate the applicant's use of public transportation?

☐ YES

☐ NO

☐ NA

If YES, please explain. _____

12. Has the applicant's functional ability decreased *temporarily* due to adjustment to medication?

☐ YES

☐ NO

☐ NA

13. If YES, please explain, and note the expected duration of the decrease in functional ability. _____

☐ NA

14. Does the applicant currently experience either auditory or visual hallucinations?

☐ YES

☐ NO

Comments: _____

15. If YES, would he/she be likely to experience auditory or visual misperceptions due to hallucinations?

☐ YES

☐ NO

☐ NA

Comments: _____

16. Are any of the following skills affected by the applicant's disability? If YES, please explain, describing the effect and the extent of limitation caused by the disability. Is the applicant able to:

	Yes	No	Some-times	Comments
Travel alone outside the house				
Leave the house on time				
Seek and act on directions				
Find way to /from bus stop				
Cross streets				
Wait for a bus				
Board the correct bus				
Ride on the bus				
Exit at the correct destination				
Transfer to a second bus				
Monitor time				
Deal with unexpected situations				

Comments: _____

17. Are any of the following affected by his/her disability? If YES, please explain.

	Yes	No	Some- times	Comments
Judgment				
Problem solving				
Insight (recognizing a problem)				
Coping skills				
Short-term memory				
Long-term memory				
Concentration				
Orientation				
Communication				
Attention to task (distractibility)				

Comments: _____

18. Would training, driver assistance, or tools such as ID cards, printed route directions, etc., help to minimize the effects noted above?

☐ YES

☐ NO

☐ NA

Comments: _____

19. Is the goal of traveling independently (even limited travel in the neighborhood) within the context of treatment?

☐ YES

☐ NO

☐ NA

Comments: _____

20. Would the use of alternative transportation (ADA paratransit service) conflict with the goals of therapy, such as confidence building?

☐ YES

☐ NO

☐ NA

Comments: _____

21. Would alternative transportation interfere with the applicant's therapy or improvement?

☐ YES

☐ NO

☐ NA

Comments: _____

22. Does the applicant demonstrate inappropriate social behavior (for example, is he/she aggressive or overly friendly)? If YES, please describe.

☐ YES

☐ NO

Comments: _____

23. Comments regarding current travel and activities:

Comments: _____

24. Does the individual drive a car?

☐ YES

☐ NO

Comments: _____

25. Are there any other life skills that the individual lacks that would be an indication of his/her inability to travel on a fixed route bus? If YES, please describe.

☐ YES

☐ NO

Comments: _____

26. Is there any additional information regarding this individual that you believe affects his/her functional ability to use regular fixed route bus service, or any special circumstances that you believe should be considered?

Comments: _____

PLACE LICENSE PHYSICIAN OFFICIAL STAMP BELOW:

Signature: _____ Date: _____

Print Name and Title: _____

Current Guam Medical License No.: _____

Business Address: _____

Mailing Address: _____

Telephone No.: _____ Fax: _____

ATTACHMENT C
Applicants with Vision Disabilities

Name of Applicant: _____

Name of Licensed Physician: _____

Date Completed: _____

1. In what capacity do you know the applicant?

2. How long have you known or worked with the applicant?

3. When did you last see the applicant? _____

4. What is the formal diagnosis of the applicant's eye disease or condition?
(Please include a visual acuity statement which indicates)
a) The visual acuity for each eye
b) The field of vision for each eye
c) The visual acuity with best correction for each eye)

5. What was the date of onset? _____

6. What is the prognosis? Is the condition stable, degenerative, or otherwise changing?

7. Is the individual able to walk outdoors alone?

☐ Sometimes

☐ Often

☐ Never

8. If SOMETIMES or OFTEN, where can he/she travel?

Only on his/her own property

☐ Yes

☐ No

To places nearby (for example, on the same block)

☐ Yes

☐ No

To places farther away

☐ Yes

☐ No

If YES to places farther away, please explain.

9. If the applicant is able to travel outdoors alone, is he/she able to cross streets without help?

At quiet streets with very little traffic

☐ Yes

☐ No

At traffic lights

☐ Yes

☐ No

At very busy intersections

☐ Yes

☐ No

NA

☐

Comments: _____

If the person is partially sighted:

10. Is he/she able to see steps or curbs?

☐ Sometimes

☐ Often

☐ Never

☐ NA

Comments: _____

11. Is his/her vision affected by different lighting conditions?

Bright sunlight

☐ Yes

☐ No

Dimly lit or shaded places

☐ Yes

☐ No

Night time

☐ Yes

☐ No

NA

☐

Comments: _____

12. Is the applicant's ability to travel outside alone affected by other conditions (consider in particular the impact of environment noise or the inability to distinguish traffic flow patterns)? If so, please describe.

Comments: _____

☐ NA

PLACE LICENSE PHYSICIAN OFFICIAL STAMP BELOW:

Signature: _____ Date: _____

Print Name and Title: _____

Current Guam Medical License No.: _____

Business Address: _____

Mailing Address: _____

Telephone No.: _____ Fax: _____

ATTACHMENT D
Applicants with Seizure Disorders

Name of Applicant: _____

Name of Licensed Physician: _____

Date Completed: _____

1. In what capacity do you know the applicant?

2. How long have you known or worked with the applicant?

3. When did you last see the applicant? _____

4. Please describe what the applicant experiences during and after a seizure. _____

5. How often do seizures occur?

6. What is the prognosis?

7. Are the seizures preceded by an aura?

☐ Yes

☐ No

☐ Sometimes

8. If YES or SOMETIMES, does the applicant usually have time to prepare and make him or herself as safe as possible?

Comments: _____

9. Are there certain things that will trigger the applicant's seizures?

☐ Yes

☐ No

☐ NA

Comments: _____

10. If YES, please describe these triggers.

☐ NA

11. Please describe the applicant's ability to travel alone in the community. When and where can he/she safely travel?

12. What advice or limitations on traveling alone in the community have been communicated to the applicant?

13. Is the applicant permitted to drive?

☐ Yes ☐ No

Comments: _____

14. Is the applicant taking any medication(s) prescribed by you or another professional?

☐ Yes ☐ No

Comments: _____

15. If YES, please list the type, frequency, dose, and any comments about how the medication(s) may complicate the individual's independent mobility in the community.

Medication Type	Dosage	Effect on Functional Ability (if any)

16. If the applicant takes his/her medication compliantly, will he/she be able to travel independently in the community.

☐ Yes ☐ No ☐ NA

Comments: _____

17. Do you deem the applicant to be compliant in taking prescribed medication?

☐ Yes ☐ No ☐ NA

Comments: _____

18. Is there anything about the use of medication that would complicate the individual's use of public transportation?

☐ Yes ☐ No ☐ NA

If YES, please explain. _____

19. Has the applicant's functional ability decreased *temporarily* due to adjustment to medication?

☐ Yes ☐ No ☐ NA

20. If YES, please explain, and note the expected duration of the decrease in functional ability.

21. Comments about the applicant's typical activities and current travel destinations.

PLACE LICENSE PHYSICIAN OFFICIAL STAMP BELOW:

Signature: _____ Date: _____

Print Name and Title: _____

Current Guam Medical License No.: _____

Business Address: _____

Mailing Address: _____

Telephone No.: _____ Fax: _____

ATTACHMENT E
Applicants with Physical Disabilities

Name of Applicant: _____

Name of Licensed Physician: _____

Date Completed: _____

1. In what capacity do you know the applicant?

2. How long have you known or worked with the applicant?

3. When did you last see the applicant? _____

4. What is the formal diagnosis of the applicant's disability? _____

5. What was the date of onset?

6. What is the prognosis? _____

7. How does the applicant's disability/health condition affect daily life activities?

8. Please define reasonable expectations for each skill (reasonable walking distances, reasonable terrain that can be negotiated, reasonable time that applicant could stand and wait for a bus, etc.).

Required Travel Skills	Reasonable Expectations
Walking distance to/from stops.	
Stepping on/off curbs and crossing streets.	
Negotiating hills/steep terrain.	
Standing time at bus stop.	
Boarding lift and non-lift buses.	
Other: _____	

9. Please define in more detail any environmental issues that may apply (temperature sensitivities – what temperatures would present unsafe or risky conditions for the applicant).

Environmental Issues	Unsafe/Risky Conditions
Extreme heat/humidity.	
Extreme cold.	
Poor air quality.	
Other: _____	

Please list the type, frequency, dose, and any comments about how the medication(s) may complicate the individual's independent mobility (travel) in the community.

Medication Type	Dosage	Effect on Functional Ability (if any)

PLACE LICENSE PHYSICIAN OFFICIAL STAMP BELOW:

Signature: _____ Date: _____

Print Name and Title: _____

Current Guam Medical License No.: _____

Business Address: _____

Mailing Address: _____

Telephone No.: _____ Fax: _____

Attachment G
Sample Eligibility Determination Letters



Felix P. Camacho
Governor
Michael W. Cruz
Lieutenant Governor

GOVERNMENT OF GUAM
(Gubetnomenton Gualan)
DEPARTMENT OF ADMINISTRATION
(Dipattamenton Atmencestrasion)
Division of Public Transportation Services

Chamorro Village
153 West Marine Corps Drive, Suite 142/143 Hagatna, Guam 96910
Tel: (671) 475-4686/4620/4616 Fax: (671) 475-4600



Lourdes M. Perez
Director
Joseph C. Manibusan
Deputy Director

Mr. A. [REDACTED]
Walk-In

Hafa Adai Mr. [REDACTED]

Based upon a review of your application for certification of ADA paratransit eligibility, the Department of Administration-Division of Public Transportation Services (DOA-DPTS) has determined that you are not eligible for ADA paratransit service. This determination is based on the following factors:

- (1) The extent of your disability do not affect and/or prevent you from boarding, riding or disembarking from any vehicle on the transportation system; and
- (2) The extent of your disability do not affect and/or prevent you from independent travel; and
- (3) The environmental conditions in combination with your disability do not prevent you from utilizing regular fixed and demand response service for your desired trips.

Federal law restricts eligibility for ADA paratransit service to persons who cannot due to a disability utilize fixed route transit service (regular bus service). This determination applies to your eligibility for ADA paratransit service offered by DOA-DPTS.

We would encourage you to use the fixed route service and hope you will become a regular customer. For that reason, we have enclosed information about the bus services to encourage you to find out just how our services can assist you in your transportation needs. You can also call our bus operations dispatchers for assistance in planning trips. That number is 647-7433.

If you do not agree with the decision that has been made, you have the right to appeal this determination. Any request for an appeal must be made in writing and must be mailed within 60 days of the date of this letter. The enclosed description of the appeal policy provides additional information about the process. Please also note that if there is any change in your ability to use the fixed route service in the future, you may submit a new application.

Si Yu'os Ma'ase,

EMELINE A. PEREIRA
Program Administrator/Ombudsperson

Enclosures: Riders Information Brochure
Bus Schedules, Routes and Map
Grievance and Appeals Brochure



GUAM REGIONAL TRANSIT AUTHORITY
Government of Guam

Felix P. Camacho, Governor
Michael W. Cruz, MD, Lt. Governor
Joseph C. Manibusan, Interim Executive Manager

P.O. Box 2896
Hagatna, GU 96932

Phone: (671) 475-4686 or 4616
Fax: (671) 475-4600



~~Jonathan B. Hatchery~~
#189 Biranda Babali
Dededo, Guam 96929

Dear Mr. ~~Hatchery~~,

Hafa Adai! Attached is a certification form which has been completed from information that you have previously provided our office. Please review the attached form. If there are any changes to be made, note the change on the form, sign and date form when completed return form to Guam Regional Transit Authority (GRTA) Administration Office.

Your certification of ADA paratransit eligibility has been determined that you are eligible for ADA paratransit service for certain trips. You will be granted the use of ADA paratransit service only when circumstances associated with your disability prevents you from using the regular fixed and demand response services. The above condition shall be used by GRTA paratransit contract provider to determine if and when you may be able to use the Paratransit Services. **You are encouraged to use the regular bus service whenever possible.**

Your certification of **Conditional** eligibility is valid until the **expiration date of February 1, 2013.** GRTA will send you an application form in the mail so that you can reapply at that time. Please note that you may also reapply at any time if you feel that changes in your ability to use the regular bus service could affect this determination.

Attached is your **Conditional** paratransit identification card, please carry it with you at all times. The identification card contains important information regarding your functional capabilities and requirements and must be shown whenever you make a trip.

I have enclosed important information about the ADA paratransit service, please read all enclosures carefully. If you have any questions about the service, or need any other assistance, please feel free to call GRTA's Administration Office at 475-4686 or 475-4616.

Sincerely,

EMELINE A. PEREIRA
Program Administrator/Ombudsperson

Enclosures: ADA Paratransit Eligibility ID
Paratransit Rider's Guide
Grievance and Appeals Brochure
No Show/Late Cancellation Brochure
Transit Route Schedules
Public Information Brochure
Transit Fare Schedule

For Official Use Only:

Type: New Renewal Replacement Nature of Disability: MI Residential Location: Chalan Pago
I.D. Number: 0984 Eligibility: C Personal Care Attendant: N
Expiration Date: February 1, 2013 Mobility Aide: None Adult/Minor: A Gender: M

PART 1. GENERAL INFORMATION (Please indicate changes if applicable)

Last Name: [REDACTED] First Name: [REDACTED] MI: [REDACTED]

Mailing Address: #420 Biranda Babali City: Dededo State: Guam Zip Code: 96929

Home Address: #05 Taitano Apartments, Chalan Pago Apt/Bldg No.: #05

Telephone No.: (Home) 808-2700 (Work/Cell) _____

Date of Birth: 03/11/62 Weight: 215 Height: 5'7" Hair Color: BLK Eye Color: BLK

Please give us the name and telephone number of someone we can call in an emergency.

Name: [REDACTED] Phone No.: 427-8876 Relationship: Brother

PART 2. CERTIFICATION FORM

Please indicate below the reason(s) why you are seeking ADA paratransit eligibility (check all that applies):

- ☒ I can use the Guam Public Transit Service (Fixed and Demand Response) to go some place, but in other places I cannot get to or from the bus stop.
- ☐ I can use the Guam Public Transit Service sometimes, but only if they are equipped with wheelchair lifts.
- ☐ Because of my disability, I can never use the Guam Public Transit Service.

I understand that the purpose of this certification form is to determine if there are times when I cannot use the Guam Public Transit Service provided by the GRTA and must therefore use the Guam Paratransit Service. I understand that the information about my disability contained in this application will be kept confidential and shared only with professionals (medical & non-medical) involved in evaluating my eligibility.

I certify that, to the best of my knowledge, the information in this form is true and correct and that there are no changes to my medical verification that was previously provided to GRTA Administration Office. I understand that providing false or misleading information could result in my eligibility status being re-examined as well as other actions deemed necessary by the GRTA.

Applicant's Signature: _____ Date: _____

PART 3. INFORMATION ABOUT THE APPLICANT'S DISABILITY

1. What type or types of disabilities prevent you from using the Guam Public Transit Service (Fixed Route or Demand Response – Check all that apply):

- ☐ Physical Disability ☐ Visual Impairment/Blindness
☐ Developmental Disability ☒ Mental Illness ☐ Other ☐ None

Please describe your disability in more detail: Chronic mental illness with paranoia and hallucination.

2. Is the disability described above temporary or permanent?

- ☐ Temporary, I expect it to last for another _____ months.
☒ Permanent ☐ Controlled with medication ☐ I don't know.

3. Please indicate below if you use any of the following mobility aids or equipment.

- ☐ Cane ☐ Long White Cane ☐ Leg Braces
☐ Crutches ☐ Walker ☐ Picture Board
☐ Alphabet Board ☐ Manual Wheelchair ☐ Powered Wheelchair
☐ Powered Scooter ☐ Other: _____
☐ Service Animal (describe): _____
☒ I don't use any of the above aids or equipment.

Note: We may not be able to accommodate you if your wheelchair/scooter is longer than 48" or wider than 32" or if your total weight with your wheelchair is more than 600 pounds.

4. Do you require the assistance of a Personal Care Attendant (someone who assists you with daily life functions)?

- ☐ Yes, I need assistance when I travel with:

Name(s) of Personal Care Attendant: _____

(PRINT)

- ☐ Mobility ☐ Reading ☐ Eating ☐ Transfers

- ☐ Medication ☐ Other _____

☒ No

PART 4. BUS ACCESSIBILITY ASSESSMENT

A transit inspector just recently visited your place of residence and the following comments and observation was presented to GRTA.

1. Multi unit apartments.
2. Road access to apartment unit is narrow and difficult for a transit bus to enter and exit your apartment unit safely.
3. Recommended pick up location is in front of the feed store.

COMMENTS: When you make a reservation for paratransit service and you were placed on schedule for a pickup. Please note that the bus is unable to enter your place of residence; please make other suitable pickup location arrangements with the dispatcher.



GUAM REGIONAL TRANSIT AUTHORITY
Government of Guam

Felix P. Camacho, Governor
Michael W. Cruz, MD, Lt. Governor
Joseph C. Manibusan, Interim Executive Manager

P.O. Box 2896
Hagatna, GU 96932

Phone: (671) 475-4686 or 4616
Fax: (671) 475-4600



[REDACTED]
P.O. Box [REDACTED]
Hagatna, Guam 96932

Dear Mr. [REDACTED]:

Hafa Adai! Attached is a certification form which has been completed from information that you have previously provided our office. Please review the attached form. If there are any changes to be made, note the change on the form, sign and date form when completed return form to GRTA Administration Office.

Your certification of ADA paratransit eligibility has been determined that you are eligible for ADA paratransit service for any trip. This certification of **Unconditional** eligibility is valid until the **expiration date of February 1, 2013**. GRTA will send you an application form in the mail so that you can reapply at that time.

Attached is your **Unconditional** paratransit identification card, please carry it with you at all times. The identification card contains important information regarding your requirements and must be shown whenever you make a trip.

I have enclosed important information about the ADA paratransit service, please read all enclosures carefully. If you have any questions about the service, please feel free to call GRTA Administration Office at 475-4686 or 475-4616.

Sincerely,

EMELINE A. PEREIRA
Program Administrator/Ombudsperson

Enclosures: ADA Paratransit Eligibility Identification Card
Paratransit Rider's Guide
No Show/Late Cancellation Brochure
Transit Route Schedules/Map
Grievance and Appeals Brochure
Public Information Brochure
Transit Fare Schedule

For Official Use Only:

Type: New Renewal Replacement Nature of Disability: VI-B/O Residential Location: Mangilao
I.D. Number: 0979 Eligibility: U/PCA Personal Care Attendant: Y
Expiration Date: February 1, 2013 Mobility Aide: Cane Adult/Minor: A Gender: M

PART 1. GENERAL INFORMATION (Please indicate changes if applicable)

Last Name: [REDACTED] First Name: [REDACTED] MI: T.

Mailing Address: P.O. Box [REDACTED] City: Hagatna State: Guam Zip Code: 96932

Home Address: [REDACTED] Mangilao Guam 96913 Apt/Bldg No.: [REDACTED]

Telephone No.: (Home) [REDACTED] (Work/Cell) [REDACTED]

Date of Birth: 07/07/74 Weight: 230 Height: 5'5" Hair Color: BLK Eye Color: BRN

Please give us the name and telephone number of someone we can call in an emergency.

Name: [REDACTED] Phone No.: [REDACTED] Relationship: Sister

PART 2. CERTIFICATION FORM

Please indicate below the reason(s) why you are seeking ADA paratransit eligibility (check all that applies):

- ☐ I can use the Guam Public Transit Service (Fixed and Demand Response) to go some place, but in other places I cannot get to or from the bus stop.
- ☐ I can use the Guam Public Transit Service sometimes, but only if they are equipped with wheelchair lifts.
- ☒ Because of my disability, I can never use the Guam Public Transit Service.

I understand that the purpose of this certification form is to determine if there are times when I cannot use the Guam Public Transit Service provided by the GRTA and must therefore use the Guam Paratransit Service. I understand that the information about my disability contained in this application will be kept confidential and shared only with professionals (medical & non-medical) involved in evaluating my eligibility.

I certify that, to the best of my knowledge, the information in this form is true and correct and that there are no changes to my medical verification that was previously provided to GRTA Administration Office. I understand that providing false or misleading information could result in my eligibility status being re-examined as well as other actions deemed necessary by the GRTA.

Applicant's Signature: _____ Date: _____

PART 3. INFORMATION ABOUT THE APPLICANT'S DISABILITY

1. What type or types of disabilities prevent you from using the Guam Public Transit Service (Fixed Route or Demand Response – Check all that apply):

- ☐ Physical Disability ☒ Visual Impairment/Blindness
- ☐ Developmental Disability ☐ Mental Illness ☒ Other ☐ None

Please describe your disability in more detail: End stage renal disease (ESRD)-extremely weak after dialysis treatment; legally blind on both eyes.

2. Is the disability described above temporary or permanent?

- ☐ Temporary, I expect it to last for another _____ months.
- ☒ Permanent ☐ Controlled with medication ☐ I don't know.

3. Please indicate below if you use any of the following mobility aids or equipment.

- ☐ Cane ☒ Long White Cane ☐ Leg Braces
- ☐ Crutches ☐ Walker ☐ Picture Board
- ☐ Alphabet Board ☐ Manual Wheelchair ☐ Powered Wheelchair
- ☐ Powered Scooter ☐ Other: _____
- ☐ Service Animal (describe): _____
- ☐ I don't use any of the above aids or equipment.

Note: We may not be able to accommodate you if your wheelchair/scooter is longer than 48" or wider than 32" or if your total weight with your wheelchair is more than 600 pounds.

4. Do you require the assistance of a Personal Care Attendant (someone who assists you with daily life functions)?

☒ Yes, I need assistance when I travel with:

Name(s) of Personal Care Attendant: _____ Care Giver
(PRINT)

- ☐ Mobility ☒ Reading ☒ Eating ☐ Transfers

☒ Medication ☐ Other _____

☐ No

PART 4. BUS ACCESSIBILITY ASSESSMENT

A transit inspector just recently visited your place of residence and the following comments and observation was presented to GRTA.

1. Multi unit apartments.
2. Gravel/dirt road access to apartments.
3. No access for a bus to enter and exit apartment unit safely.

COMMENTS: When you make a reservation for paratransit service and you were placed on schedule for a pickup. Please note that the bus is unable to enter your place of residence; please make other suitable pickup location arrangements with the dispatcher.

Attachment H
Paratransit ID Card

WARNING
THIS CARD IS ISSUED FOR OFFICIAL USE OF THE
HOLDER DESIGNATED HEREON, ANY ABUSE OR
MISUSE OF THIS CARD WILL RESULT IN PENALTY

DATE ISSUED	DOB	WEIGHT
HEIGHT	HAIR COLOR	EYE COLOR

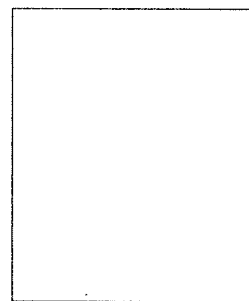
SIGNATURE OF ISSUING OFFICIAL

IN ACCORDANCE WITH PARS 27, 37 & 38, OF 49 C.F.R. AND PUBLIC LAW 26-27 THE INFORMATION PROVIDED BY THE APPLICANT DURING THE APPLICATION REVIEW PROCESS, AND SIGNED BY THE APPLICANT, OR ITS REPRESENTATIVE, THE DIVISION OF PUBLIC TRANSPORTATION HAS DETERMINED THE FOLLOWING ELIGIBILITY CATEGORIES BELOW.

1. (TC) TEMPORARY- CONDITIONAL
2. (TU) TEMPORARY- UNCONDITIONAL
3. (C) CONDITIONAL- RIDES GRANTED UNDER CERTAIN CIRCUMSTANCES BUT NEED PARATRANSIT FOR CERTAIN TRIPS.
4. (U) UNCONDITIONAL-PERMANENT PARATRANSIT RIDER
5. (D) DIABETIC W/ FOOD
6. (PCA) PERSONAL CARE ATTENDANT

GUAM PUBLIC TRANSIT SYSTEM

Division of Public Transportation Services
DEPARTMENT OF ADMINISTRATION
Government of Guam



0987

NAME: _____

EXPIRATION DATE: _____

PARATRANSIT ELIGIBILITY: _____

PARATRANSIT ELIGIBILITY CARD

Attachment I Appeals Process

GUAM REGIONAL TRANSIT AUTHORITY

Government of Guam



GUAM PUBLIC TRANSIT SYSTEM GENERAL INFORMATION

GRIEVANCE REVIEW AND APPEALS BOARD:

**For more Information Telephone:
475-4686, 4620, 4616**



INTRODUCTION:

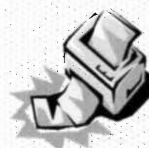
The Guam Regional Transit Authority (GRTA) has established the Guam Public Transit Grievance Review and Appeals Board. Furthermore, GRTA has adopted its internal Grievance Review and Appeals Procedures for the purpose itself, an avenue of rectifying any alleged violation of the goals, policies, operational procedures, requirements and provisions, as well as local and federal laws.

The right of a person to prompt and equitable resolution of a complaint as the U.S. Department of Transportation or the U.S. Department of Justice. These rules are intended to protect the rights of interested persons to meet appropriate due process standards and to assure that local and federal regulations including the American with Disabilities Act (ADA).

OBJECTIVE:

It is the intent and objective of the Guam Regional Transit Authority that the Grievances Review and Appeals Procedures will provide for:

- a. The prompt and equitable resolution of complaints alleging any action prohibited by the U.S. Department of Transportation regulations implementing Title II of the ADA, that no otherwise qualified disabled individual shall solely by reason of disability be excluded from the participation in, be denied the benefits of, or be subject to discrimination under any program or activity sponsored by the Guam Regional Transit Authority.
- b. Resolving any action, directly or indirectly caused by GRTA, its service provider, or another individual that may adversely affect the safe and efficient transport of a passenger.
- c. Resolving complaints at the local level without requiring the complainant to resort to the Federal Complaint Procedures.



Filing a Complaint:

All complaints must be in writing and Submitted to:
Interim Executive Manager
Guam Regional Transit Authority
P.O. Box 2896
Hagatna, Guam
96932

All Complaints should include the name and address of the person filing the complaint and be specific as to the exact date, time, place and details with complete description as well as any witnesses.

For more information call the Guam Regional Transit Authority at 475-4686/4620/4616.



Attachment J
Percent Subscription Trips of All Scheduled Trips
December 1–7, 2009

Date	Time	Scheduled Subscription Trips	Scheduled Demand Trips	Percent Subscription
Tues 12/1	5:30	11	1	92%
	6:30	9	5	64%
	7:30	8	4	67%
	8:30	7	3	70%
	9:30	5	8	38%
	10:30	5	6	45%
	11:30	4	9	31%
	12:30	0	0	midday break
	13:30	18	3	86%
	14:30	9	4	69%
	15:30	7	5	58%
	16:30	2	0	100%
	17:30	7	3	70%
	18:30	1	1	50%
	19:30	3	1	75%
	Total	96	53	64%
Wed 12/2	5:30	11	3	79%
	6:30	9	2	82%
	7:30	7	7	50%
	8:30	3	7	30%
	9:30	5	2	71%
	10:30	4	9	31%
	11:30	9	4	69%
	12:30	0	0	midday break
	13:30	18	5	78%
	14:30	4	1	80%
	15:30	3	4	43%
	16:30	6	5	55%
	17:30	3	3	50%
	18:30	0	2	0%
	19:30	1	4	20%
	Total	83	58	59%
Thu 12/3	5:30	11		100%
	6:30	8	3	73%
	7:30	8	4	67%
	8:30	7	8	47%
	9:30	9	6	60%
	10:30	6	6	50%
	11:30	7	8	47%
	12:30	0	0	midday break
	13:30	19	1	95%

Date	Time	Scheduled Subscription Trips	Scheduled Demand Trips	Percent Subscription
	14:30	6	1	86%
	15:30	5	3	63%
	16:30	3	1	75%
	17:30	5	4	56%
	18:30	1	3	25%
	19:30	3	3	50%
	Total	98	51	66%
Fri 12/4	5:30	10	2	83%
	6:30	11	2	85%
	7:30	7	3	70%
	8:30	6	5	55%
	9:30	3	7	30%
	10:30	4	19	17%
	11:30	8	9	47%
	12:30	0	0	midday break
	13:30	13	8	62%
	14:30	6	2	75%
	15:30	2	1	67%
	16:30	4	4	50%
	17:30	6	1	86%
	18:30	0	2	0%
	19:30	0	5	0%
	Total	80	70	53%
Sat 12/5	5:30	3	1	75%
	6:30	4	3	57%
	7:30	1	4	20%
	8:30	4	6	40%
	9:30	6	7	46%
	10:30	1	14	7%
	11:30	6	8	43%
	12:30	0	1	midday break
	13:30	3	3	50%
	14:30	4	5	44%
	15:30	4	3	57%
	16:30	3	7	30%
	17:30	2	4	33%
	18:30	1	1	50%
	19:30	2	2	50%
	Total	44	69	39%
Sun 12/6	5:30	0	0	0%
	6:30	0	0	0%
	7:30	2	4	33%
	8:30	2	5	29%

Date	Time	Scheduled Subscription Trips	Scheduled Demand Trips	Percent Subscription
	9:30	0	3	0%
	10:30	0	2	0%
	11:30	0	3	0%
	12:30	0	0	midday break
	13:30	1	6	14%
	14:30	1	5	17%
	15:30	1	0	100%
	16:30	0	7	0%
	17:30	0	2	0%
	18:30	0	0	0%
	19:30	0	0	0%
	Total	7	37	16%
Mon 12/7	5:30	8	2	80%
	6:30	8	1	89%
	7:30	8	4	67%
	8:30	4	8	33%
	9:30	2	2	50%
	10:30	3	6	33%
	11:30	6	8	43%
	12:30	0	0	midday break
	13:30	16	3	84%
	14:30	5	4	56%
	15:30	4	4	50%
	16:30	3	4	43%
	17:30	6	4	60%
	18:30	0	1	0%
	19:30	1	2	33%
	Total	74	53	58%
Grand Total		482	391	55%

Attachment K
Sample Denials Log

Sample

Post-It® Fax Note 7671

To: TRACY
Co. Recpt. Co.
Phone #
Fax # 449-3253

Date 1/7/09
From ENELY
Co.
Phone #
Fax # 475-4660

Guam Public Transit System
ADA Paratransit Ride Denial
Tracking Log

NOVEMBER 09

Name	Date	Pickup Time	Dropoff Time	Route	Denial	Excluded Mile Zone	Missed Trip	Unusually Long Trip	Remarks
James S. Gonzales	11-25-09	11:28 AM	1P		1	Y			1st to Sally Book!
Wanda Ann Jip	11-25-09	11:30 AM	1P		1	Y			She will not ride Get 3! / NO Time!
Wanda Ann Jip	11-26-09	11:30 AM	1P		1	N			Sally Book! / NO Time!
Pauline Martinez	11-26-09	11:26 AM	3:00 PM		1	N			Requesting for 1500 plus but not available!
Lisa Day	11-27	11:27	10:00		2	N			NO availability!
Linda Gallardo	11-27	11:20	10:00		2	N			Drop-off time Request not available!
Sheila Perez - Longtime	11-28	11:30	10:00		2	N			got her at 12:00 pm
Mike Stephen	11-30	11:30	10:00		1	N			Sally Book!
Doris Ann	11-30	11:30	10:00		2	Y			Sally Book!
Connie Dunge	11-30	11:30	10:00		2	Y			Sally Book!

Attachment L
Sample Reservations Log

MONDAY

FREEDOM 1

MORNIG SHIFT

Date Called	Time Called	P/UP TIME	Customer's Name	Pick - Up Location	Drop - Off Destination	W C	PC A	M D
		530	Michael Taitano	640 Gayinero Rd Yigo	CHDP Mmong			
		540	Bacillio Laxamana	358 Josen Diego Yigo	Jamaican Grill Hagatna (CV)			
		600	Robert Dizon	1185 Ysengsong Rd Dededo	Finegayan Elem School			
		615	Carmelita Joseph	1644-A Chn Ottot Ast Ded	CHDP Mmong			
		635	David Wooten	238 Tum Hts	CHDP Mmong	x		
		730	Stephen Miller	University Grdns Mangilao	Untalan Middle School	(x)		
		745	Natasha Calderon	I & E Grdns Mangilao	Comp Mall Behind King's			
		820	Isabel Lubas	140 Marigold Lp Sta Ana Ded	Hafa Adai Ex Tam			
		840	Estalita Palma	409 E Sta Barbara Dededo	DYA Mangilao			
		900	Jesus Okada	276 Salisbury St Ded	Mangilao Senior Ctr			x
		915	Juliana Alviz	121 S Mariposa Liguana Ter	GMH Tam			
				Do Not Schedule Please				
		1035	Linda Gallardo	RCG Harm Lp Rd	120 Tun Luis Tugon Bk Rd Yigo	x	x	
				Do Not Schedule Please				
		1130	Charles Paulino	GMH Tam	4-A Makin Ct Sinajana			x
1170	1142	1130	Soel Kandido	Salvation Army	Namania Harmon			
		1200	Luis Castro	GDC Tam	215 Blas St Leyang Barr			
		1200	Armando Gonzalez	GDC Tam	107 Laurel St. Ded			x
		1200	John Paulino	GDC Tam	Gyma 910th W Rd.	x		

NOTES

SAMPLE : PARATRANSIT RESERVATION
LOG SHEET

MONDAY

FREEDOM 1

AFTERNOON SHIFT

10/17/09

Date Called	Time Called	P/UP TIME	Customer's Name	Pick ~ Up Location	Drop ~ Off Destination	W C	PC A	M E
		1330	Michelle Hudgens	CHDP Mmong	215 Pugua St Latte Plnt			
		1330	Carmelita Joseph	CHDP Mmong	1644 A Chn Otto Ast Ded			
		1330	Renee Lujan	CHDP Mmong	108 S Fakpe Marianas Terr	x		
		1330	Michael Taitano	CHDP Mmong	640 Gayinero Rd Yigo			
		1350	Jesus Okada	Mangilao Senior Ctr	276 Salisbury St Ded			x
		1400	Estalita Palma	DYA Mangilao	409 E Sta Barbara Ded			
		1500	Juliane A. SMH		BT Smangue Lujan			
		1515	Christina Manalo	GDC Tam	142 Chn Koda Machanao Ded	(x)		
		1630	Narciso Paz	Guma Ginefite Ctr Wusstig	550 Ryan Crl Canada Lp	x		
11/19	1500	1715	Karissa Ganish	2nd Marine Mre	35-1 - G. B. Royal Garden			
		1730	Ester Arca	Sagan Mami Tam	GCC Mangilao (d/o only)			
		1730	Rosalyn Anderson	Sagan Mami Tam	Tuba St B/S Mmong			
11/27	1152	1930	Huyen Huang	Sagan Mami Tam	Kyong Hua Mre			

NOTE

SAMPLE : PARATRANSIT RESERVATION
LOG SHEET

Attachment M
TCRP Project B-28
Estimation of ADA Complementary Paratransit Demand

TCRP Project B-28
Estimation Tool for ADA Complementary Paratransit Demand

Input Values for GRTA		
ADA service area population (2000 Census)	154,805	
Base fare for ADA paratransit (Dollars)	\$0.35	
Percent of applicants for ADA paratransit eligibility found conditionally eligible	76.0	
Conditional trip determination	0	
Percent of the population in the ADA service area in households with 1999-2000 income below the poverty line	23.0	
Effective on-time window for ADA paratransit (minutes)	20	
Results		
Predicted Annual Ridership per Capita	0.63	
Predicted Annual Ridership	96,982	
Confidence Intervals for Mean Value for Systems with the Characteristics Entered		
	Trips per Capita	Annual Ridership
Upper 95% confidence limit	1.15	178,199
Upper 90% confidence limit	1.04	160,494
Lower 90% confidence limit	0.38	58,603
Lower 95% confidence limit	0.34	52,780
GRTA FY 2009 Ridership		37,181