



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

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

January 27, 2009

Mr. Mark E. Huffer
General Manager
Kansas City Area Transportation Authority
1200 East 18th Street
Kansas City, MO 64108

Re: Compliance Review of KCATA's ADA Complementary Paratransit Service

Dear Mr. Huffer:

Thank you for your response to the Federal Transit Administration's (FTA) letter and preliminary report of findings of the Americans with Disabilities Act of 1990 (ADA) Complementary Paratransit compliance review of the Kansas City Area Transportation Authority's (KCATA) ADA complementary paratransit service from September 17 to 20, 2007. Enclosed is the Final Report. As of the date of this letter the Final Report became a public document and is subject to dissemination under the Freedom of Information Act of 1974.

Also enclosed with this letter is an updated progress table listing FTA's understanding of the corrective actions either planned or taken by KCATA in response to the preliminary findings contained in the draft report. If you feel that our summarization of corrective actions is inconsistent with your response, please inform us in writing as soon as possible.

Following most of the areas where findings were made, we have:

- Identified responses that adequately address the finding
- Requested documentation of results and outcomes
- Requested clarification for specific corrective actions based on response to the report findings

Please continue to use the enclosed table as the format to report progress to FTA on the corrective actions that KCATA has completed or intends to implement as a result of our findings. Please identify each response by item number (e.g., 1.1, etc.). The requested documentation, along with updates on the status of implementation of proposed corrective actions, should be provided in quarterly reports to FTA. Each report should include the planned and actual completion date of the corrective action, the current status and contact person information for

each corrective action, and specific reporting requests cited in this letter and on the enclosed table. The first report will be due on February 27, 2009, and should include data for the months of October 2008 through January 2009, and any actions completed prior to that date that have not already been addressed. Additional reports will be due by April 15, 2009 and July 15, 2009 and 15 days after each calendar quarter thereafter until FTA releases KCATA from this reporting requirement.

We recognize the progress that you have made in responding to the findings of the review as presented in your December 16, 2008 letter. In addition to these efforts, we request that your first progress report more fully respond to the following findings. The enclosed chart also includes additional findings where reporting or minor clarifications are also needed.

1. ADA Complementary Service Criteria

5. Finding: KCATA written materials suggest that customer complaints must be filed within five days of an occurrence.

Corrective Action Proposed by KCATA: Time limitation is to expedite the investigation. KCATA will accept complaints beyond the five day time limit.

Clarification of Corrective Action: While KCATA may accept complaints beyond five days after an incident, the wording in the Share-A-Fare brochure may discourage individuals from making complaints after five days if they have not done so.

Additional Reporting: Please provide updated language, if any, concerning the complaint process for Share-A-Fare service.

2. ADA Complementary Paratransit Eligibility

3. Finding: According to KCATA publications, companions other than PCAs must either provide assistance to the paratransit eligible rider or pay twice the fare paid by the rider.

Corrective Action Proposed by KCATA: The companion who is required to pay 2X the fare of the paratransit eligible person is a participant in a non-ADA paratransit program.

Clarification of Corrective Action: FTA accepts this clarification of Share-A-Fare policy. However, the wording in the Share-A-Fare brochure does not make the distinction between ADA and non-ADA paratransit service.

Additional Reporting: Please provide updated language concerning the fare for companion passengers on Share-A-Fare ADA service.

3. Telephone Access

2. **Finding:** SAF coordinators answered only 64 percent of incoming calls in 2 minutes or less for the entire sample week, and only 85 percent of all calls within 4.5 minutes. The worst daily performance was on Tuesday, September 11. For this day, only 26 percent of calls were answered with 2 minutes, and only 49 percent were answered within 4.5 minutes.

Corrective Action Proposed by KCATA: Additional staff to answer phones have been included in the 2009 budget

Additional Reporting: Please provide a weekly shift schedule of the Share-A-Fare coordinators.

In addition, please provide reports of telephone system performance for the most recent 30 days with data on number of calls on hold and calls abandoned by time of day (as provided to the review team during its site visit and described on page 28 of the FTA report).

5. Service Performance

2. **Finding:** KCATA does not have a standard for on-time drop-offs for SAF service. KCATA does not track the timeliness of drop-offs.

Corrective Action Proposed by KCATA: Changing in the scheduling software will allow for the tracking of the timeliness of drop-offs

Clarification of Corrective Action: Please provide KCATA's standard for on-time drop-offs for Share-A-Fare service. If the software has not been implemented, please report on the expected date of implementation and progress toward doing so.

5. **Finding:** KCATA does not regularly analyze the duration of its SAF trips.

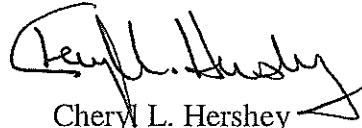
Corrective Action Proposed by KCATA: Process to analyze the duration of ADA paratransit trips expected to be in place 01/01/09.

Clarification of Corrective Action: Please provide an analysis of trip duration for Share-A-Fare service for the three most recent months. If the regular process is not yet in place, please report on the expected date of implementation and progress toward doing so.

We recognize the efforts that KCATA has already taken to correct the deficiencies identified in the draft report, and we anticipate your continued endeavors to take further corrective actions as noted in this letter. We appreciate the cooperation and assistance that you and your staff have provided us during this review. If you have any questions about this matter, please contact me or Mr. Jonathan Klein, Program Manager for this review, at (202) 366-0809 or at his e-mail address: jonathan.klein@dot.gov.

It would also be very helpful to us if you would provide electronic copies of all correspondence to this office to Mr. Thomas Harris, the FTA Region VII Civil Rights Officer, at his email address: thomas.harris@dot.gov

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl L. Hershey", with a stylized flourish at the end.

Cheryl L. Hershey
Director
FTA Office of Civil Rights

Enclosures

cc: Mokhtee Ahmad, FTA Region VII Administrator
Thomas Harris, FTA Region VII Civil Rights Officer
David Chia, Planners Collaborative, Inc.