

**Metropolitan Atlanta Rapid Transit Authority
(MARTA)
Atlanta, GA**

**ADA Complementary Paratransit Service
Compliance Review**

February 9–12, 2009

Summary of Observations

Prepared for

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

Prepared by

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with
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Final Report: December 3, 2012

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1 Purpose of the Review

Public entities that operate fixed route transportation services for the general public are required by the U.S. Department of Transportation (DOT) regulations implementing the Americans with Disabilities Act of 1990 (ADA) to provide ADA complementary paratransit service for persons who, because of their disability, are unable to use the fixed route system. These regulations (49 CFR Parts 27, 37, and 38) include six service criteria 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 oversight efforts, FTA, through its Office of Civil Rights, conducts periodic reviews of fixed route transit and ADA complementary paratransit services operated by Federal grantees.

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

FTA conducted a review of ADA complementary paratransit service provided by the Metropolitan Atlanta Rapid Transit Authority (MARTA) of Atlanta, Georgia, known locally as MARTA Mobility, from February 9 to 12, 2009. Planners Collaborative, Inc., and TranSystems Corp., both located in Boston, Massachusetts, conducted the review for the FTA Office of Civil Rights. The review focused primarily on compliance of MARTA'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)).

Sections 37.123 through 37.127 of the DOT ADA regulations require that a process be established for determining who is ADA paratransit eligible and that eligibility determinations are made consistent with regulatory criteria. Section 37.129(a) requires that ADA complementary paratransit be origin-to-destination service. Section 37.131(a) requires that ADA complementary paratransit service be provided between origins and destinations within 3/4 of a mile of fixed bus routes and between points within a 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 based 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 complementary paratransit plans address efforts to coordinate with other public entities that have contiguous or overlapping ADA complementary paratransit service areas.

The review also examined MARTA's ADA complementary paratransit service with respect to the requirements related to eligibility determinations, rider assistance policies, and ADA complementary paratransit service criteria.

This report summarizes the observations and findings of the on-site review of MARTA's ADA complementary paratransit service. Chapter 2 explains the approach and methodology used to conduct the review. Chapter 3 then describes key features of transit services provided by MARTA's fixed route bus and ADA complementary paratransit service. Chapter 4 p summarizes the findings that are also presented at the end of the remaining chapters. Chapter 5 includes observations and findings related to rider assistance policies, service area, fares, trip purposes, days and hours of service, and coordination with other public transit entities. Observations and findings related to the eligibility determination process are presented in Chapter 6. Observations and findings related to the capacity constraint prohibition, as well as additional observations on response time, are then presented in Chapters 7-10 on telephone service, reservations, service performance and resources. Recommendations for addressing some of the findings are also provided.

On October 31, 2012, FTA transmitted the draft report to MARTA electronically for review and response within ten days. FTA did not receive a response from MARTA.

2 Overview

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

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

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

This review also includes 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
- Efforts to coordinate with other ADA complementary paratransit services in the area
- ADA complementary paratransit service eligibility process
- Telephone capacity

The review also addresses scheduling, dispatching, operation of service and an analysis of resources as a potential contributor to capacity constraints.

2.1 Pre-Review

The FTA Office of Civil Rights sent a notification letter to MARTA on January 2, 2009 confirming dates for the review and requesting that information needed by the review team be sent in advance of the review. The notification letter is provided in Attachment B.

This information included:

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

MARTA made additional information available during the on-site visit. This information included:

- Copies of completed driver manifests
- Six months of service data, including the number of trips requested, scheduled, denied, canceled, no-shows, missed trips, and trips provided

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

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

2.2 On-Site Review

An on-site review of the ADA complementary paratransit service took place from February 9 to 12, 2009. The on-site review began with an opening conference, held at 9 a.m. on Monday, February 9 at the MARTA offices at 2424 Piedmont Road, NE, in Atlanta. MARTA representatives attending the meeting included:

- Dwight A. Ferrell, Deputy General Manager and Chief Operating Officer
- Mary Ann Jackson, Assistant General Manager, Bus Operations
- Sharon C. Crenchaw, Director, MARTA Mobility
- Reginald K. Diamond, Executive Director, Diversity and Equal Opportunity
- Vicki Dewberry, General Superintendent, MARTA Mobility
- Cheryl Turner, Office Administrator

David Chia of Planners Collaborative and Russell Thatcher and Patricia Monahan of TranSystems represented the review team. Susan Clark of FTA's Office of Civil Rights in Washington, DC, participated via telephone.

Ms. Clark opened the meeting by thanking MARTA for opening its office and operations to the review. She stated that the review team would make every effort to complete the review with a minimal level of disruption to the MARTA operation. She invited MARTA staff to contact her directly with questions or concerns about the review. She encouraged MARTA to take advantage of review team member's knowledge while the team was on site for technical assistance. She stated that she hoped the review would be beneficial to MARTA and indicated that FTA was available provide appropriate assistance.

At the time of the review, MARTA staff indicated that the agency was reviewing its no-show/suspension policy and was not enforcing suspensions. The review team stated that they could provide technical assistance on possible elements of a policy as part of the review.

MARTA staff also asked how FTA interpreted “significant” and “substantial” numbers of excessively long trips and late trips when determining if capacity constraints exist in the ADA paratransit service. Ms. Clark stated that the travel time analysis would compare ADA paratransit ride times with comparable trips made on the fixed route system.

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

Following the opening conference, the review team met with MARTA staff to discuss the information sent in advance as well as the information and material that was available on site. Information about the design of the ADA paratransit service was reviewed.

For the remainder of the morning on February 9, the review team discussed the process in place at MARTA to record and respond to rider comments. Rider comments months were compiled. The review team also began gathering information about the process used by MARTA to plan and budget for ADA paratransit services. Finally, the review team gathered information needed to analyze compliance with the ADA paratransit requirements related to service area, fares, days and hours of service, and rider assistance policies.

In the afternoon on February 9, the review team toured the MARTA Mobility call center at 2424 Piedmont Road. Review team members then gathered information about call center staffing levels, the design of the telephone system, and telephone performance (hold times). Review team members also began observing the process used to take ADA paratransit trip requests.

In the morning of Tuesday February 10, the review team continued its observations of the trip reservations and initial scheduling process. Review team members sat with selected reservation agents, listened to calls from riders, and recorded observations on the handling of trip requests. The review team then toured the MARTA Mobility operations center at 1040 Brady Avenue in Atlanta. Review team members met with the lead scheduler to discuss procedures used to develop final runs. Several special data reports on on-time performance and travel times were also prepared with the assistance of MARTA staff. The review team also began examining completed driver manifests as a part of on-time performance verification, and reviewing long paratransit trips, comparing on-board travel times with those on the fixed route service.

In the afternoon of February 10, the review team members observed the dispatch area during the peak hours of operation. Vehicle drivers were also interviewed as they returned from morning runs. The review team also met with the MARTA Mobility staff that managed the ADA paratransit eligibility determination process and began reviewing eligibility determination files.

On Wednesday February 11, the review team examined vehicle driver workforce records, training, and turnover and reviewed fleet information, daily vehicle availability, and operating spare ratios. The review team continued its examination of on-time performance, on-board travel times, and eligibility determination records. No-show policies and information about the tabulation of rider no-shows were reviewed. Several more vehicle drivers were interviewed.

On Thursday morning February 12, the review team met with MARTA staff at 2424 Piedmont to continue discussing the process used to plan and budget for ADA paratransit services. The review team also 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 MARTA office at 2424 Piedmont Road. MARTA staff attending the exit conference were:

- Dwight A. Ferrell, Deputy General Manager and Chief Operating Officer
- Mary Ann Jackson, Assistant General Manager, Bus Operations
- Elizabeth O'Neill, Assistant General Manager and Chief Counsel
- Sharon C. Crenchaw, Director, MARTA Mobility
- Reginald K. Diamond, Executive Director, Diversity and Equal Opportunity
- Knox O'Callaghan, Director of Grant Programs
- Vicki Dewberry, General Superintendent, MARTA Mobility
- Cheryl Turner, Office Administrator
- Denise Bell-Brown, ADA Coordinator
- Joyce D. Brown, Equity Administration
- Becky Reumann, MARTA Mobility Eligibility Specialist
- Shirley Webb, MARTA Mobility Reservations Supervisor
- Mark Webster, Assistant Superintendant, Mobility Dispatch
- Jo Dennis, MARTA Mobility Assistant Superintendant
- Michael Fredericks, Manager of Mobility Planning and Scheduling
- Renee Willis, Executive Administrator
- Jennifer Jinadu-Wright, Director of Marketing and Sales

Attending for the review team were David Chia of Planners Collaborative and Russell Thatcher and Patricia Monahan of TranSystems. John Day of FTA's Civil Rights Office in Washington, DC, participated by telephone.

Mr. Day opened the exit conference by thanking MARTA staff for their cooperation in the review. He reviewed the process that FTA will use to develop a final report and stated that at MARTA will have an opportunity to comment on the final report.

The review team members also thanked the MARTA 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
- Resources (vehicles, personnel, and financial planning and budgeting)

3 Background

MARTA is the ninth largest transit system in the U.S. and North America. It provides public transit services in the Atlanta metropolitan area, which includes the City of Atlanta and adjoining Fulton and DeKalb Counties. MARTA provides rapid rail, fixed route bus and ADA complementary paratransit service. About 1,650,000 people live in the MARTA service area, which covers about 804 square miles.

The rapid rail system consists of 48.1 route miles, 338 rail cars, and 38 stations. The rail system operates weekdays from 4:23 a.m. until 2:02 a.m. All 38 stations are advertised as fully accessible.

Fixed route bus service is provided with a fleet of 600 buses operating on 132 routes and about 1,000 route miles. Bus service is provided weekdays from 4:31 a.m. until 2:03 a.m. The fixed route bus system is also advertised as fully accessible.

MARTA's ADA paratransit service is operated with 175 lift-equipped vans. In FY 2008, the Mobility program provided 347,379 passenger trips.

MARTA's FY 2008 Annual Report notes that the agency accommodates about one half million passenger boardings per day on its various services. About 105.9 million passenger boardings were recorded in FY 2008.

The base fixed route bus fare at the time of the review was \$1.75.

In FY 2008, total MARTA operating expenses, excluding depreciation expenses, were about \$368.8 million. The two primary revenue sources for the system are fares (which account for about 19 percent of total revenues) and a sales tax (which accounts for about 64 percent of total revenues).

3.1 Prior FTA Review

The FTA Office of Civil Rights conducted a compliance review of MARTA's ADA complementary paratransit service in September 2001. The review found that the MARTA ADA paratransit service met many of the regulatory requirements, but the final report of the prior review included several findings. These were:

- Reliance on a paper application for determining ADA paratransit eligibility sometimes did not fully capture travel issues. Denying eligibility based solely on the paper application was sometimes inaccurate. It was noted that 97% of applicants who were denied and appealed were made eligible in the appeal process. Follow-up with applicants and named professionals was suggested before denying eligibility.
- Letters of ADA paratransit eligibility determination that granted conditional eligibility did not include information about the appeal process.
- The telephone standard to answer 95% of calls within eight minutes did not ensure acceptable hold times.
- Long hold times and a high call abandoned rate on the reservations phone lines.

- Inadequate staff in reservations to handle calls during the busiest times of the day.
- Difficulty reaching riders who could not get through on the phone and who left a voice message.
- Internal transfers to management and support staff during busy call times that resulted in callers being put back in the queue which further increased total hold times.
- A lack of music, periodic messages, or other indication that callers had not been disconnected during long telephone holds times.
- A lack of information about the dispatch telephone number, which increased the call volume to the reservations line and resulted in internal transfers described above.
- Scheduling practices that wait listed some riders.
- Denials of up to 6.3% of total monthly requests and initial denials as high as 38% of next-day requests.
- A pattern of trip denials during afternoon and early evening hours.
- A shortage of extraboard drivers and an inability to cover unscheduled call-outs by vehicle drivers on the day of service.
- A high number of trips unscheduled on the day of service and dispatched same-day as add-ons, which impacted on-time performance and on-board ride times.
- Inadequate scheduling staff to handle the high number of unscheduled (wait listed) trip requests and to prepare final runs for the day of service.
- The lack of a call-back log to document calls to riders when scheduled pickup times are changed.
- Inadequate dispatch staff to handle the high number of unscheduled trips on the day of service and to proactively manage scheduled runs.
- A lack of scheduled breaks for vehicle drivers which appeared to result in drivers creating their own breaks by arriving early for some trips and then late for the next trips.
- On-time performance of only 80-85%.
- Excessively long on-board ride times for medium length (16 to 30 mile) trips.
- An inadequate number of vehicles to meet the expressed demand for ADA complementary paratransit service.
- An inadequate number of vehicle drivers to meet the expressed demand for service.
- A budget process based on approved vehicle driver positions that did not allow for adequate growth to meet the demand for ADA complementary paratransit service.
- A low rate of trips per capita which indicated capacity constraints in the ADA complementary paratransit system.

MARTA developed corrective actions to address the above findings and submitted quarterly progress reports to FTA through October 15, 2004. All issues identified in the 2001 review were considered addressed with the submission of the last progress report.

3.2 Description of ADA Complementary Paratransit Service

At the time of the review, MARTA's ADA complementary paratransit service, MARTA Mobility, was operated in-house. MARTA employees made eligibility determinations, took and scheduled trip requests, and dispatched, operated, and maintained vehicles.

The MARTA Mobility (“Mobility”) call center, where trip reservations were taken and initial scheduling of trips to runs was done, was located at MARTA main headquarters at 2424 Piedmont Road in Northeast Atlanta. The operations center and garage was located at 1040 Brady Avenue in Atlanta. Scheduling, dispatching, vehicle pullout and maintenance were all performed at the Brady Avenue operations center.

At the time of the on-site visit MARTA operated a fleet of 175 Mobility vehicles. All vehicles were lift-equipped body-on-chassis minibuses.

Key ADA complementary paratransit service policies, including the type of service provided, service area, days and hour, fares, response time, and trip purposes are detailed in Chapter 5.

3.3 ADA Complementary Paratransit Performance Policies and Standards

MARTA provided the review team with advance information detailing its ADA complementary paratransit performance policies and standards; much of the information was in a response letter and attachments dated January 20, 2009. Additional information was collected during the on-site review. Following is a summary of the paratransit performance standards established by MARTA for trip denials, vehicle wait time and rider no-shows, missed trips, on-time performance, on-board travel times, and telephone performance.

Trip Denial Standard

MARTA provided documentation in Attachment 4 of its response that indicated that MARTA defined a trip denial as “pickups made more than 120 minutes after the scheduled time” and had set as its goal to have no trip denials. During the on-site review, MARTA staff explained that this definition was related to an operational practice implemented for very late pickups. If on the day of service pickups were projected to be more than 120 minutes late, calls were made to riders to inform them of the situation. Riders were asked if they still wanted the pickup. If riders indicated that the trips would not be taken, the trips were recorded in the system as denials.

The need to revise MARTA’s definition of trip denials is discussed in Chapter 8.

Vehicle Wait Time and Rider No-Shows

Page 21 of the *MARTA Mobility Customer’s Guide (Guide)* indicated that vehicle drivers were only required to wait 5 minutes for riders to board.

Page 30 then defined a “no-show” as a situation where the “Customer is not at the scheduled pickup location at the established Ready Time and fails to board the bus within five minutes of the arrival of that bus.”

Page 30 also noted that a rider would also be charged with a no-show if they cancelled late or cancelled at the door. A “late cancel” was defined as the “Customer cancels a scheduled trip

within two (2) hours of the established Ready Time. “ A “cancel at the door” was defined as “Customer chooses not to ride the vehicle after it arrives at the scheduled pickup.”

MARTA’s no-show /suspension policies and the need to revise them are discussed in greater detail in Chapters 9.

Missed Trip Standard

Information forwarded with the January 20, 2009 letter did not include a definition for missed trips or a goal related to missed trips. Discussions with MARTA staff during the on-site visit indicated that MARTA considered a trip to be “missed” if the vehicle arrived more than 30 minutes after the end of the pickup window (i.e., more than 60 minutes after the scheduled pickup time the scheduled pickup time). It was noted that a formal standard and goal associated with missed trips had not been established.

The need to revise the definition of missed trips and to consider establishing a standard is discussed in Chapter 9.

On-Time Performance Standards

The *Guide* noted that riders were given a 30 minute pickup window during the trip reservations process. The 30 minute window started at the scheduled pickup time. Riders were asked to be ready to board their vehicle any time within this 30 minute window.

Documentation provided in Attachment 4 to the January 20, 2009 letter then indicated that MARTA considered a trip to be performed on time if the pickup is made “within 30 minutes of the scheduled time. “ That documentation then set a “Target” to be on time for at least 95 percent of scheduled trips. Documentation provided did not indicate a standard related to on-time drop-offs (discussed in Chapter 9).

On-Board Travel Time Standard

The formal performance metrics described in Attachment 4 to MARTA’s January 20, 2009 letter did not include a metric or “Target” for on-board ride times for the Mobility program. .

MARTA’s response did not include a target or standard for on-board ride times for Mobility trips.

At the time of the review, *the Guide (Page 15)* stated “Every effort will be made to schedule trips so that travel times are comparable to the time it would take to make the trip by fixed route bus.” It also stated that “a MARTA Mobility trip may be as long as a fixed route trip plus one-half (1/2) hour.”

Standards for on time performance and on-board ride time are discussed in Chapter 9.

Telephone Service Standard

Documentation provided in Attachment 4 to the January 20, 2009, letter indicated that MARTA had established two metrics for Mobility telephone performance for “reservation calls.” The first was “Average call wait time for Mobility reservation calls (in minutes). The “Target” was to have an average wait time of no more than one minute. The second was “Abandonment rate for Mobility reservation calls; the “Target” was an abandonment rate of no more than 3.5 percent.

The metric did not specify if the average hold time of 60 seconds applied to each hour of the day, each total day of service, or average service for the month. The metric also did not indicate if the target was to be achieved 100 percent of the time or some other percentage.

The telephone hold time standards are discussed in more detail in Chapter 7.

3.4 Customer Comments

Formal Complaints Received by FTA

At the time of the on-site visit there were two formal complaints on file with FTA concerning MARTA ADA complementary paratransit service. The first, dated February 12, 2007, indicated the following issues:

- Very late pickups—one that was allegedly four hours late and one that was allegedly two hours late
- Drivers distracted from their job and talking on cell phones
- Drivers with poor customer service skills
- Inconsiderate and apathetic dispatchers
- Long hold times when calling dispatch to check on the status of a ride

The second formal complaint, dated August 27, 2007, indicated the following issues:

- A ride that typically took one hour took three hours and twenty minutes due to a vehicle breakdown
- A driver talking on her cell phone while operating the lift and securing the rider’s wheelchair
- An 8:00 a.m. pickup that was not made until 8:40 a.m. on one day and not until 9:37 a.m. on another day
- Long hold times when calling to check on the status of a ride (20 minutes was cited)

FTA’s investigation of the latter complaint indicated that MARTA had experienced problems with its scheduling software, a shortage of vehicle drivers, and several vehicle breakdowns on the service day cited by the complainant. Information provided by MARTA indicated that additional vehicle drivers had been hired, 50 new paratransit vehicles had been purchased, and another 95 new vehicles ordered to address the service problems noted by the complainant.

Customer Comments

Prior to and during the on-site visit, the review team contacted seven Mobility paratransit riders and three staff at local disability and human service agencies that assisted riders using the paratransit service. Each was asked for comments on various aspects of the service, including: the eligibility determination process; telephone hold times, trip denials and getting trips scheduled at desired times; on-time performance; on-board travel times; vehicle driver assistance and professionalism; and vehicle condition. Each was also asked for any other comments on the service not covered by the specific questions. Summaries of the comments received are provided in the appropriate sections throughout the report.

Rider Comments on File at MARTA

The review team examined the quarterly reports compiled by MARTA's Office for Diversity and Equal Opportunity (DEO) for FY 2008 Third Quarter through FY 2009 Second Quarter, which covered January through December 2008. The DEO reports tracked valid complaints only and did not include the number of commendations and suggestions received from riders. The reports indicated receipt of 1,758 valid complaints regarding ADA paratransit service during the period.

MARTA's target rate for complaints was 5.5 complaints or fewer per 1,000 trips. Data submitted by MARTA staff prior to the review indicated that in 2008, MARTA provided 383,169 passenger trips. The complaint rate for 2008 was 4.6 complaints per 1,000 trips, therefore below MARTA's target rate.

A compilation of complaints in the various categories tracked by DEO in the quarterly reports is shown in Table 3.1. The most frequent complaint was related to on-time performance. As shown in Table 3.1, 881 complaints received during this period (50.1 percent) concerned late pickups or drop-offs. Complaints in the "Other" category, which included comments about early pickups, driver performance, vehicle issues, and other topics, numbered 332, or 18.9 percent. Two hundred thirty complaints, or 13.1 percent, concerned the failure of a vehicle to arrive for a pickup. The subject of 168 complaints (9.6 percent) was communication between the customer and MARTA staff. Other issues, including excessive ride time, a change in the customer's "ready time", and telephone performance, each accounted for 2 to 4 percent of the complaints received during 2008.

Table 3.1 – Breakdown of Complaint Issues, January through December 2008

Subject	Number of Complaints	Percent of Total
Late Pickup/Drop-off	881	50.1
Excessive Ride Time	77	4.4
Vehicle No-show	230	13.1
Change in Ready Time	36	2.0
Telephone (dispatch number)	34	1.9
Discourteous/No or Slow Response	168	9.6
Other (bus early, vehicle stopping location, driver performance, AC, ventilation, etc.)	332	18.9

Total	1,758	100.0
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To get a more detailed breakdown of the types of complaints received, the review team reviewed individual complaint files for December 2008, obtained from DEO. The review team identified 168 issues cited in the valid complaints received during the month (the number of complaints received was fewer than 168; a number of complaints involved more than one issue). Table 3.2 summarizes the complaints.

On-time performance complaints—50 regarding late pickups and 31 about late drop-offs—accounted for 48 percent of those received during the month. In contrast, early pickups and drop-offs accounted for 3.6 percent of the month’s complaints. Complaints filed by 21 individuals who felt that they had been incorrectly charged with a no-show made up another 12.5 percent of complaints. Vehicle no-shows, ETA ride information, driver performance, and vehicles going to the wrong address or location were each the subject of 6 to 8 percent of complaints for the month. Other complaint issues included a change in the rider’s ready time (4.2 percent), travel time (2.4 percent), reservations/scheduling (1.2 percent), vehicle issues (0.6 percent) and “Other” (0.6 percent).

Table 3.2 – Breakdown of Complaint Issues, December 2008

Subject	Number of Complaints	Percent of Total
Late Pickup	50	29.8
Late Drop-off	31	18.5
Early Pickup	5	3.0
Early Drop-off	1	0.6
Travel Time	4	2.4
Vehicle No-show	11	6.5
Incorrect Passenger No-show	21	12.5
Change in Ready Time	7	4.2
ETA Information	10	6.0
Driver Performance	13	7.7
Reservations/Scheduling	2	1.2
Vehicle Issues	1	0.6
Wrong Address/Location	11	6.5
Other	1	0.6
Total	168	100.0

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 and Complaint Handling Process

1. MARTA's policies, in the *MARTA Mobility Customer's Guide (Guide)* and other rider information stated that "Mobility's service mode remains curb to curb" despite a June 2007 MARTA general order that "operators must provide assistance beyond the curb to riders who make such a request or where a customer's disability or external conditions prevents them from reach the curb to board the vehicle or navigating the pathway from the vehicle to the entrance of their destination." At the time of the review, provision of such assistance appeared to depend upon riders making their needs known to drivers. To meet the requirements of §37.129(a) of the DOT ADA regulations, MARTA must revise its public information to inform applicants and eligible riders that this assistance will be provided when needed, due to disability, and how and when they are to request it. As described in Chapter 8 of this report, the revised policy must take into account that an eligible rider's need for assistance may vary depending upon the location, particularly if it is one to which the rider has not traveled previously. MARTA must ensure that personnel and contractors are trained to proficiency on this policy and provide copies of the revised policy, procedure and public information to FTA. As discussed in Chapter 6 of this report MARTA must cease granting "curb-to-curb service only" as a type of conditional eligibility. This policy does not take into account that an eligible rider's need for assistance may vary depending upon the location.
2. To meet its obligations under §§27.13(b) and 27.121(b) of the DOT ADA regulations MARTA must have procedures in place for keeping copies of complaints on file for one year and maintaining a summary of complaints on file for five years. Based on the information the review team provided to FTA, it does not appear that these obligations were discussed with MARTA staff. Please provide information on MARTA's policies and procedures describing how these obligations are met.
3. As discussed in Chapter 8 of this report, according to a MARTA supervisor at the time of the review, MARTA did not always make timely revisions to its paratransit scheduling software in response to changes to the fixed route serve area and at times these revisions took several months. The delay meant that the Trapeze software incorrectly indicated that trips were ineligible when they actually were eligible and vice versa. Ensuring that revisions to the Trapeze polygons identifying the service area are made in a timely manner is the most thorough and accurate way of

determining whether or not a trip is an eligible trip to meet the requirements of requirements of §37.131(a) of the DOT ADA regulations.

4.2 ADA Complementary Paratransit Eligibility

1. At the time of the review, MARTA did not charge a fare when approved applicants traveled to designated locations to obtain the Mobility Breeze Card photo ID. However, MARTA charged a fare for the return trip. The DOT ADA regulation under §37.5 prohibits the imposition of special charges on riders with disabilities. Appendix D at §37.125 explains that the paratransit eligibility process may not impose unreasonable administrative burdens on applicants, and, since it is part of the entity's nondiscrimination obligations, may not involve "user fees" or application fees to the applicant." Since the trip to obtain a Breeze Card is part of the process to become eligible for and use the Mobility service, MARTA is prohibited from charging a fare for either trip. MARTA must revise public information to remove the statement that a fare will be charged for the return trip, direct employees to cease imposing these charges and provide a copy of the directive and revised public information to FTA.
2. At the time of the review, public information stated that MARTA must process applications within 21 days. Based on the information provided to FTA, it is unclear if and how applicants were made aware of the right to presumptive eligibility. To meet the requirements of §37.125 c of the DOT ADA regulations, MARTA must revise its public information to inform applicants and prospective applicants that if MARTA has not made an eligibility determination within 21 calendar days of receiving a complete application, presumptive eligibility will be provided on the 22nd day until and unless MARTA denies the application. Please provide to FTA copies of revised or current public information to FTA. If MARTA requires applicants to obtain a Breeze card before using Mobility service, MARTA must allow adequate time for the Breeze card to be obtained, so the applicant can begin using the system on the 22nd day. As part of MARTA's response to this finding, FTA requests a justification for "closing" the applicant's file if either the applicant or the medical professional do not respond within 30 days, and the rationale for omitting this consequence from letters sent to both.
3. At the time of the review, required information was missing from all sample eligibility determination letters provided to the review team, and it appeared that a letter granting temporary eligibility was not requested or provided. To meet the requirements of the DOT ADA regulations under §37.125(d), MARTA must revise its eligibility determination letters that deny eligibility and those granting conditional or temporary eligibility to state the specific reason(s) for the finding. As explained in Appendix D of the DOT ADA regulations, in the case of a denial "the reasons must specifically relate the evidence in the matter to the eligibility criteria of the rule and of the entity's process. Appendix D also states that determination letters must include information on the applicant's use of a personal care attendant (PCA). If MARTA intends that any eligible rider may ride with a PCA, language to that effect would be included in the determination letter. As part of MARTA's response to this finding,

submit actual letters that MARTA considers representative and submit them to FTA for review, after redacting the applicant's personal information.

4. The professional verification form and cover letter in use at the time of the review raised concerns that MARTA's process may not have solicited adequate information to permit MARTA to make thorough and accurate eligibility determinations, may not have considered the inaccessibility of bus stops and/or may not have adequately considered the ability of applicants whose functional limitation is getting to or from fixed route bus and rail service. To meet the requirements of §37.123(e)(3), MARTA's eligibility process must consider the inaccessibility of bus stops as a potential barrier even after its fixed route bus fleet is "100% accessible" and must consider inability to get to and from fixed route bus and rail service to be a functional limitation. This information is essential to make thorough and accurate determinations of conditional eligibility, as MARTA's eligibility process did not include functional assessments while MARTA stated it was considering implementing feeder service. Two of the questions appeared to focus only on "riding" the rail and bus systems. As part of MARTA's response to this finding, revise the professional verification form and cover letter and provide copies to FTA.
5. While determinations to deny eligibility appeared appropriate in 12 of the 15 cases reviewed, the lack of required specificity in the denial letters prevented the review team from ascertaining the possible reasons for three of the denials. As described in detail in Chapter 6 of this report, all three applicants appeared to be candidates for some level of eligibility. In one of the three cases, follow-up with the named professional was needed to resolve conflicting statements on the professional verification form. Based on information provided to FTA, this failure to follow up with the applicant or the named professional may also have prevented MARTA from determining applicants' functional abilities and establishing conditions based on factors typically encountered outdoors (such as distance, environmental factors, inaccessible paths of travel or bus stops, and terrain). The apparent failure to consider these functional abilities and architectural and environmental barriers suggest that MARTA's process denied eligibility to applicants who should have been determined eligible for at least some level of ADA paratransit service.
6. At the time of the review, MARTA inappropriately granted applicants receiving chemotherapy and radiation treatments conditional eligibility to/from chemotherapy and radiation treatments only. MARTA did not permit these riders to make reservations for other trips. This policy does not meet the requirements under § 37.131(d) of the DOT ADA regulations and MARTA must cease restricting eligibility based on trip purpose. MARTA must inform similarly-situated riders whose eligibility has been linked to trip purpose that they may reapply for eligibility. As part of MARTA's response to this finding, please submit an example of letters and/or other public information sent to these riders informing them of the right to reapply.
7. At the time of the review, the lack of required specificity in the sample letters described in finding #6 above also prevented the review team from confirming staff statements that MARTA had not yet implemented trip-by-trip eligibility ("trip eligibility") and that conditionally eligible riders could use Mobility as if they had unconditional use of the service. To meet the requirements under §37.125 of the DOT

ADA regulations, MARTA must revise its eligibility process to first either grant conditional eligibility to applicants who are able to use fixed route under some conditions, or it must grant unconditional eligibility to these applicants. The conditional eligibility determination letter must identify the applicant's functional limitations and the environmental conditions that prevent the applicant from using fixed route. In the determination discussed in finding #6 above, the conditional eligibility letter should list the condition as severe fatigue, if that was the condition that prevented fixed route use. Next, in trip-by-trip eligibility ("trip eligibility"), MARTA must apply the individual's conditions to his or her specific trips requests based on the trip origin and destination and must do so for every trip request to determine whether or not the trip is to be taken on Mobility or on fixed route service.

8. As part revising conditional eligibility determination letters, MARTA must cease granting "feeder service only" to those applicants it determines are prevented from getting to or from bus stops because of their disability. To meet the requirements of §37.125 of the DOT ADA regulations, MARTA's eligibility determinations granting conditional eligibility must specify conditions or limitations on the individual's eligibility, for the reasons described in the previous findings, as conditions related to the eligibility criteria and the results of MARTA eligibility process regarding the applicant's functional ability are those which the rider has the right to appeal. While feeder service may be appropriate for some of the trips to be taken by eligible riders—depending on the rider's functional limitations and the length of the comparable fixed route trip (among other factors) – offering only feeder service for all trips that may be requested by these riders during the rider's entire term of eligibility may be inappropriate. Depending upon how MARTA chooses to operationalize feeder service, the decision on whether to provide feeder service may be a trip-by-trip determination process, which MARTA had not implemented at the time of the review. The fact that MARTA may sometimes decide to provide feeder service should be discussed in the determination letter separately from the conditions placed on the applicant's eligibility.
9. At the time of the review, MARTA had no information to provide to the review team on the number of appeals requested, decisions reversed, decisions upheld, and decisions remanded to MARTA for reconsideration; staff stated that there had been no appeals before the Elderly & Disabled Access Advisory Committee in the past few years. At the same time, MARTA stated that if applicants called to discuss the decision, staff often obtained new information, and very frequently revised the initial decision. One concern is that MARTA may have made revisions to determinations on a case- by case-basis only, rather than also tracking the revisions in its database to identify any patterns of decisions that are frequently revised to ascertain the information needed to enable staff to make more accurate determinations during the initial determination process. Tracking this information is important in the event that a complaint is filed with MARTA and or with FTA.
10. To meet its obligations under §37.125(g)(2), MARTA must cease requiring applicants to prepare a written statement to appeal and establish an appeal process that includes an opportunity for a hearing. At the time of the review, MARTA inappropriately required those granted conditional eligibility to file a written appeal as a precursor to

a hearing. Based on the information the review team provided to FTA, it is unclear as to whether applicants denied eligibility or those granted temporary eligibility were also inappropriately required to file a written appeal. As part of MARTA's response to this finding, FTA requests information on the reporting relationship(s) between the individual(s) involved in making eligibility determinations and the Eligibility Specialist identified in the appeal process, so that FTA can determine whether or not the appeal process guarantees the requisite separation of function. MARTA must direct staff to cease requiring written appeals, revise its eligibility material, denial, temporary and conditional letters and public information to remove requirements for a written appeal and to reflect the hearing process. The practice of requiring applicants to prepare a written appeal as a precursor to obtaining the required opportunity to be heard and to present arguments and information is a prohibited unreasonable administrative burden. The practice could also dissuade applicants from exercising their appeal rights. If MARTA elects to prepare the one-page appeal form described in recommendations section 6.5, please provide a copy to FTA.

11. At the time of the review, MARTA provided visitor eligibility to visitors who presented documentation of ADA paratransit eligibility from other transit system or who provided some other documentation of disability. To meet the requirements of §Section 37.127(d) of the DOT ADA regulations MARTA must revise its visitor eligibility process. Documentation cannot be required of visitors whose disability is apparent. Documentation can only be required of visitors whose disability is not apparent. MARTA must accept a certification by such individuals that they are unable to use the fixed route system. MARTA must revise its visitor eligibility process.

4.3 Telephone Access

1. To meet the requirements of §37.131(f) to operate Mobility service without any operational pattern or practice that significantly limits the availability of service, a revised telephone standard that specifies a maximum hold time for reservations and "ETA"- line calls is needed. Telephone hold times must be tracked and monitored against the standard and staffing adjusted to avoid a pattern or practice of significantly long hold times. MARTA must track all hold times, including those longer than five minutes. Based on telephone performance for the month of January 2009 for the reservations office, sixty-two percent of calls met MARTA's hold time standard. At the time of the review, the "metrics" for telephone performance in reservations prevented MARTA from measuring actual maximum hold times. The "metrics" lacked a target percentage of calls that MARTA expected to be handled and a percentage of the time the standards were to be achieved. The "metrics" did not specify if the target average hold time of 60 seconds and the target maximum of 90 seconds applied to each hour of the day, each total day of service, or an average for the month. MARTA's target for reservation telephone performance of a 60 second average hold time was met during only 2.5 hours on Monday of the sample week and nine percent of reservation calls answered on Friday of the sample week were on hold for more than five minutes. MARTA's performance standard of an abandoned call rate of 3.5 percent or less was met on two days of the sample week. Use of averages as a performance standard can mask individual call times and periods of poor

performance during the month; it is possible to meet a monthly average standard while still experiencing significantly longer hold times at specific times of day and/or on specific days of the week. As part of MARTA's response to this finding, draft the revised standard and submit a copy to FTA.

Additional findings requiring corrective action are similar to those discussed in Chapter 8, Trip Reservations. See Chapter 8 for findings regarding access to reservations. See below for recommendations concerning telephone performance

4.4 Trip Reservations and Scheduling

1. At the time of the review, it did not appear that MARTA provided an opportunity for passengers calling the reservations office on Saturday, Sundays and holidays to negotiate pickup times. Public information indicated that trip requests for next day service only could be left on voice mail between the hours of 10 a.m. and 4 p.m. on Saturdays, Sundays, and holidays and that call-backs to customers leaving a message during those hours would occur within one hour. The call back log for Sunday, February 8, 2009 indicated that only riders calling between 10:00 -10:15 received a call-back within an hour. Based upon the description of the log book provided to FTA, it is unclear whether pickup times were changed after the callbacks and it is unclear how MARTA handled trip requests when the rider could not be reached. Section 37.131(b)(2) of the DOT ADA regulations, permits transit systems to negotiate pickup times with ADA paratransit passengers but prohibits requiring the individual to schedule a trip more than an hour before or an hour after his scheduled time. The call-back log for Saturday, February 7, 2009, indicated that calls received between 10 a.m. - noon were returned either in less than one hour or between an hour and approximately one hour and 20 minutes. Calls received between noon-4 p.m. were generally returned more than an hour later and up to two hours and 20 minutes later. A total of 158 call-backs were recorded in the log for that day. In an additional 65 instances (over 17 percent of the call-backs), the log indicated that a message was left for the rider or the caller could not be reached. MARTA must revise its process to ensure that passengers are able to negotiate pickup times prior to finalizing the schedule.
2. At the time of the review, riders could make reservations for Mobility trips on weekdays from 8:30 a.m. to 5:00 p.m. However, on Saturdays, Sundays, and holidays, riders had to leave a voice mail message to make a trip reservation only between 10 a.m. and 4 p.m. and wait for a call-back. The weekend and holiday hours for making reservations do not meet the requirements under §37.131(b)(1) of the DOT ADA regulations which requires the provision of reservations service during at least all normal business hours of the entity's administrative offices, as well as during times, comparable to normal business hours, on a day when the entity's offices are not open before a service day. Appendix D to the DOT ADA regulations explains:

Under this provision, an entity must make its reservation service available during the hours its administrative offices are open. If those offices are open 9 to 5, those are the hours during which the reservations service must be open, even if the

entity's transit service operated 6 a.m. to midnight. On days prior to a service day on which the administrative offices are not open at all (e.g., a Sunday prior to a Monday service day), the reservation service would also be open 9 to 5.

3. At the time of the review, MARTA recorded as trip denials any outright inability to serve trip requests and any pickups made more than 120 minutes after the scheduled time. This incomplete definition of denials may have resulted in an undercount of denied trips. To meet the requirements of §37.131(b) MARTA must revise its policy on tracking denials to include any outright inability to serve trip requests and any trips which it cannot schedule within one hour before or after the eligible riders desired departure time. Even if a rider accepts an offer of a trip that is outside the one hour window, the trip must be tracked as a denial due to MARTA's inability to meet the response time requirement. If only one leg of a round trip can be reserved, and the rider declines the trip, it must be tracked as two denials. These are the ADA trips which must be served and MARTA must track and report this information to FTA.

4.5 Service Performance

1. For the sample day, MARTA was on time for only 58.9 percent of the sampled trips. If trips with pickups that occurred prior to the start of the pickup window are included, this increases to 87.4 percent; however, passengers cannot be compelled to begin their trips early and on-time performance should not be dependent upon a portion of substantially early pickups.) The latter was comparable to the on-time performance reported by MARTA for that day, 90.6 percent, but below MARTA's target of 95 percent. The percentage of pickups that took place before the beginning of the window was 28.5. These on-time performance levels suggest the existence of a capacity constraint in violation of §37.131(3)(i)(A) of the DOT ADA regulations. MARTA must develop a plan to review operational practices and identify ways to increase on-time performance for Mobility pickups within the pickup window.
2. At the time of the review, while MARTA recorded actual drop-off times for all trips and tracked drop-off performance for all Mobility trips with requested appointment times, it did not have a standard for drop-off performance. Of the 151 sampled Mobility trips, 72 had specified appointment times. The analysis showed that 83.3 percent of these trips had on-time drop-offs and 17.7 percent did not. This represented poor performance as one of every six riders with a known appointment arrived late. MARTA has an implicit obligation to get riders to appointments on time (not late) and an explicit obligation to monitor performance to insure that Mobility service is operated without any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons. Operational practices that cause riders to arrive late to appointments may discourage riders from using the service, which would constitute a capacity constraint prohibited by the DOT ADA regulations. Review team members noticed that reservationists almost always used a 90 minute "Global" travel time parameter setting in Trapeze, rather than a more refined travel time settings linked to the length of the trip. This could contribute to late drop-offs for long trips. MARTA must develop an on-time standard or window for on time drop-offs to appointments; continue to track, measure review and report

drop-off performance for all trips with a requested appointment time; and to print the appointment times on driver manifests for all trips with a requested appointment time. As part of MARTA's response to this finding, please provide copies of these standards and directives to FTA.

3. To meet its obligations to negotiate pickup times under §37.131(b)(2), MARTA must ensure that schedulers and dispatchers do not adjust the rider's scheduled pickup time (ready time) or the pickup window without the rider's consent and must limit any changes to within 60 minutes of the requested pickup time. Review team observations raised issues with MARTA's scheduling practices at the time of the review: First, the biggest challenge to the schedulers was the shortage of available runs; according to the scheduling supervisor, this was due to a lack of available drivers on most weekdays. Even with the capacity created by same-day cancellations and no-shows, the scheduling supervisor acknowledged that the overnight and morning dispatchers' insertion of unscheduled trips onto the available vehicle runs led to scheduling violations, such as late pickups and drop-offs and/or long travel times). Second, while Mobility's policy was obtain rider approval when an estimated pickup time fell out of the negotiated pickup window, the schedulers said that these calls did not always occur. Third, the scheduling supervisor confirmed review team observations that the software was set to schedule the pickup at least 90 minutes prior to the appointment time, regardless of the distance or estimated travel time. Finally as discussed on Page 72 of this report, it was also observed that the scheduling software would sometimes generate inappropriate pickup times (the system generated early morning pickups at 6 or 7 a.m. for pickups in the early or late afternoon). MARTA should continue to investigate this problem, as a solution to the issue could not be found during the on-site review. MARTA must direct staff and contractors to honor the negotiation window and document all customer contact regarding changes to the ready time and/or the pickup window, and provide a copy of the directive to FTA. As part of MARTA's response to this finding, FTA requests MARTA's current definition(s) of Mobility denials and the number of Mobility ADA paratransit trips, requested, scheduled, provided, and denied for the past six months.
4. At the time of the review, MARTA incorrectly defined and undercounted late trips and missed trips, preventing MARTA from identifying potential capacity constraints in the system. MARTA had not set a performance standard for avoidance of late or missed trips. MARTA must revise its definition of a missed trip to include any attempted pickup after the end of the pickup window that does not result in a passenger being transported, either due to the rider turning down or cancelling the trip, or the rider no longer being at the pickup location. If a vehicle does not arrive within the pickup window, the rider has no obligation to wait for the vehicle and is under no obligation to board the vehicle. If the rider elects to board a vehicle that arrives after the pickup window, that pickup must be counted as a late pickup. To meet the requirements of §37.125(h)(1)-(3) and §37.131(f)(3)(i)(B) of the DOT ADA regulations, MARTA must operate Mobility without a substantial number of missed trips and must ensure that trips missed by MARTA are not counted against the passenger. As discussed in Chapters 8 and 9, MARTA must revise the coding from cancellations and denied trips to missed trips for those pickups cancelled by riders informed that the vehicle is going to be more than 60 minutes late. MARTA must

direct ETA clerks and other employees to code missed trips properly to ensure that riders are not experiencing a substantial number of trips missed due to transit system error and that such trips are not counted as no-shows against the rider. MARTA must also establish a performance goal of zero missed trips and a performance standard on late trips. As part of MARTA's response to this finding, please provide copies of the directive(s) to FTA.

5. At the time of the review, there did not appear to be explicit procedures for employees to follow prior to declaring no shows or to verify that reported no-shows were in fact no-shows. Review team analysis of the sample week indicated there were at least 140 missed trips, yielding an adjusted missed trip rate of 1.80 percent; the review team found four trip records incorrectly coded as passenger no-shows and 41 trip records incorrectly coded as cancellations by ETA clerks. Based upon the information provided to FTA, MARTA did not appear to have a procedure in place to verify that the vehicle had waited 5 minutes per MARTA policy, had arrived within the pickup window at the correct pickup location or that that dispatch had made an attempt to locate the rider. MARTA must review Mobility trip data, particularly no-shows and cancellations, to ensure that these are being correctly categorized. As part of MARTA's response to this finding, develop such policies and procedures and provide copies to FTA.
6. At the time of the review, MARTA's no-show suspension policy did not appear to make distinctions between no-shows within a rider's control, those due to circumstances beyond the rider's control and those due to system error. MARTA must revise its no-show suspension policy as follows:
 - The vehicle must arrive within the pickup window and the vehicle operator must wait 5 minutes, per MARTA's policy, before a no-show is declared
 - No-shows that are not within the customer's control will not be counted against the rider
 - The advance notice of the proposed suspension must be provided in writing and the number of days of advance-notice must be specified
 - Riders' frequency of use must be taken into account, to ensure that sanctions are imposed only for a pattern or practice of missing scheduled trips and not isolated accidental or singular incidents
 - The length and reasonableness of all proposed suspensions must be revised. The policy called for a 14-day suspension if a rider accumulated four no-shows within a floating six-month period, a 30-day suspension if the rider accumulated an additional four no-shows in a subsequent six-month period and a six-month suspension if a rider accumulated 12 no-shows within a floating 12-month period

As part of MARTA's response to this finding, please also provide the current no-show rate for Mobility service.

7. To meet its obligations under §37.125(h)(3), MARTA must establish an explicit appeals process and make it available to an individual on whom sanctions have been

proposed and submit the appeals policy to FTA. The policy must call for the sanction to be stayed pending the outcome of the appeal. The appeals process must meet the requirements of 37.125(g). As part of MARTA's response to this finding, please provide the requested information to FTA.

8. Based on the information provided to FTA, at the time of the review, there did not appear to be an explicit procedure for monitoring Mobility trip lengths to ensure they were not excessive. While MARTA had established an internal standard for Mobility on-board time of fixed route travel time plus an estimated walking time of 30 minutes per trip, consistent with FTA technical assistance, MARTA had not established a target percentage of Mobility trips that were expected to meet the standard. MARTA was therefore unable to identify potential capacity constraints in the system. Review team analysis of a sample of Mobility trips that had travel times of 60 minutes or more found that 14 percent of the sample was not comparable to fixed route travel times on the sample day. If these results were extrapolated to Mobility service as a whole, about 1.5 percent of Mobility trips took longer than comparable fixed route trips. To meet its obligations under 37.131(f)(3)(i)(C) to operate Mobility service without substantial numbers of trips with excessive trip lengths, MARTA has an explicit obligation to monitor Mobility service to ensure that trip lengths are not excessive and adjust scheduling and dispatching practices to reduce the number and percentage of Mobility trips with travel times that exceed MARTA's maximum on-board travel time standard established internally at the time of the review and those are longer than comparable fixed route trips. MARTA must also establish a performance standard on comparable trip length. As part of MARTA's response to this finding, please provide copies of performance standard and monitoring plan to FTA.

4.6 Resources

There were no findings of non-compliance requiring corrective action in Chapter 10 of this report. See Section 10.10 of this report for recommendations.

5 ADA Complementary Paratransit Service Criteria

This chapter presents information about MARTA's ADA complementary paratransit service policies with respect to the DOT ADA regulatory criteria for each of the following:

- Type of service
- Service area
- Hours and days of service
- Fares
- No trip purposes
- Efforts to coordinate with adjoining transit systems

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

Observations concerning the response time requirement are discussed in Chapter 8. Observations concerning the requirement that ADA complementary paratransit service be operated without capacity constraints appear throughout the report if applicable

5.1 Customer Comments

None of the riders and agency representatives contacted in advance of the on-site review expressed concerns about the type of service, service area, days and hours of operation, fares, trip purposes, or trip reservations policies. Two of the 10 riders contacted expressed some concern about the MARTA complaint handling process. They indicated that they were not always satisfied with the responses received when they called to express concerns about the service.

Neither of the two formal complaints on file at FTA cited issues with the basic service policies addressed in this chapter or with the complaint handling process. Similarly, the review of internal complaints on file at MARTA, described in Chapter 3, did not include any complaints about service policies or the complaint process.

5.2 Type of Service

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

According to DOT's interpretation of this provision, if the base service is curb-to-curb, transit agencies must have procedures in place to provide additional assistance beyond the curb if this is needed for eligible riders to complete their trips. This might include assisting riders to and from the front door and policies and procedures for providing this assistance in a safe and reasonable way.

As noted in Chapter 8, Mobility reservationists did not request information from callers about the need for assistance beyond the curb

MARTA's written policies, both in the *Guide* and driver training materials indicated that the drivers were required to offer curb-to-curb service to riders. A MARTA general order (GO #07-04, June 24, 2007) revised this policy:

MARTA's Mobility's service mode remains curb to curb, however, as a result of this [FTA] ruling MARTA Mobility operators must provide assistance beyond the curb to customers who make such a request or where a customer's disability or external conditions prevents them from reach the curb to board the vehicle or navigating the pathway from the vehicle to the entrance of their destination.

This means that if a customer requests or requires assistance from the door of their origin or from the vehicle to the door of their destination, operators must provide such assistance. However, operators must under no circumstances pass through doors to assist customers.

The "FTA ruling" cited in the above policy excerpt refers to DOT Disability Law Guidance titled "Origin-to-Destination Service," issued on September 1, 2005.

While this policy may be adequate for knowing if assistance is needed from the vehicle to the door of the destination, it is not sufficient for determining if riders need assistance from the door of their origin to the vehicle. Information about the need for assistance at the origin is typically captured in the reservations process.

Interviewed drivers stated that they were prepared to offer greater assistance if the rider requested it.

5.3 Service Area, Days and Hours of Service

Section 37.131(a)(1) of DOT ADA regulations requires a transit provider operating fixed route bus service to provide complementary paratransit service that covers, at a minimum, all areas within 3/4 of a mile of all of its bus routes, along with any small areas within its core service area that may be more than 3/4 mile from a bus route, but which are otherwise surrounded by served corridors. The service area for ADA complementary paratransit service must include areas outside of the defined fixed route jurisdiction—such as beyond political boundaries or taxing jurisdictions—that are within 3/4 mile of the transit operator's fixed route, unless the public transit agency does not have the legal authority to operate in those areas. For entities operating a light rail or rapid rail system, the paratransit service area includes a 3/4-mile radius around each station, with service provided from points within the service area of one station to points within the service area of another.

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

area that has fixed route bus service on weekdays but not weekends must have ADA complementary paratransit service (provide trips) on weekdays but not necessarily on weekends; an area that has bus service from 5 a.m. until 9 p.m. must have ADA complementary paratransit service, at minimum, from 5 a.m. until 9 p.m.

The Guide stated that:

Paratransit service may not extend beyond a 3/4-mile radius from the fixed route system. Paratransit service operates to and from any point of origin or destination that is within a 3/4-mile corridor on each side of each bus route or within a 3/4-mile radius of each rail station within the MARTA service area. Points of origin and destination not within this 3/4-mile corridor or not surrounded by fixed-route service are not eligible for ADA Paratransit services.

At the time of the review, if small areas were surrounded by the service area defined above, MARTA included them in the Mobility service area. When reductions in the fixed route service had led to certain riders' homes falling out of the new Mobility service area, MARTA had grandfathered these addresses into the Mobility service area for a limited time—usually six months.

MARTA used the Trapeze Paratransit Scheduling Software (PASS) system to book and schedule trip requests. In the Trapeze scheduling software, Mobility staff had created service area polygons for each bus route and rail station: one each for weekday, Saturday, and Sunday service. The polygons carried the Mobility service area for the route (or rail station), along with the beginning and ending operating times and collectively create the service areas for Mobility service on weekdays, Saturday, and Sunday. The *Guide* (Page 6) stated “MARTA Paratransit service is generally available Monday through Friday from the first pickup at 5:00 am until the last pickup at 12:30 am and weekends/holidays from 5:30 am until 12:30 am” and that when a fixed route in a particular area operated with more limited hours, Mobility service was available only during those hours, e.g., if a bus route ended service at 9 p.m., Mobility was available in that area only until 9 p.m.

However, Mobility staff indicated that, in practice, for a particular day of the week, Mobility service was available for the full span of service hours for the entire service area. At the time of the review, this was 4:31 a.m. until 2:03 a.m.

As discussed in Chapter 8, at the time of the review, reservationists were instructed to double-check with the supervisor, if a rider requested a trip with the origin and/or destination that the Trapeze software showed was outside of the Mobility service area. The reservationist could also research the address by referring to a map book. One of the MARTA supervisors said that he used “Google Earth” for a more precise review of the service area to ensure that a rider received any service due to him or her.

Internal MARTA procedures called for the Mobility Trapeze polygons to be updated whenever there was a fixed route “markup” or service change, which usually happened quarterly. A

supervisor stated, that the updating of Trapeze polygons was not always timely, which could cause the Trapeze system to “reject” trips that were eligible.

5.4 Fares

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

The cash fare for a one-way trip on all MARTA fixed route bus and rail was \$1.75. The fare for an ADA complementary paratransit service trip was \$3.50, exactly two times the fixed route fare. Companions who accompanied a certified rider also paid a \$3.50 fare. Personal care attendants (PCAs) who accompanied a certified rider did not pay a fare.

MARTA also offered a monthly pass for unlimited Mobility trips for \$52.00

5.5 Trip Purposes

Section 37.131(d) of the DOT ADA regulation requires that there be no restrictions or priorities based on trip purpose in the provision of ADA complementary paratransit service. Section 37.133 of the DOT ADA regulation allows entities to establish trip purpose restrictions or priorities only for subscription service.

According to the *Guide*, subscription service “is restricted to trips to and from work, medical or educational institutions only. Service is offered Monday through Saturday.

Section 37.133 of the DOT ADA regulations allows trip purpose restrictions only for participation in the subscription service.

Findings related to trip purpose restrictions in the paratransit eligibility process are discussed in Chapter 6 of this report. Subscription trips are discussed in greater detail in Chapter 8 of this report.

5.6 Response Time

The DOT ADA regulations under § 37.131(b) require that an agency accept trip requests made the day before the trip. Requests must be accepted during normal business hours, including 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). Section 37.131(b) also allows transit agencies to negotiate pickup times up to one hour before or after the pickup time requested by riders.

At the time of the review, riders could make reservations on weekdays from 8:30 a.m. to 5 p.m. On weekdays, requests could be made for trips from one to seven days in advance. On Saturdays,

Sundays, and holidays, reservation requests were limited to next-day trips only and riders were instructed to call and leave a voice mail message between 10 a.m. and 4 p.m. MARTA staff stated that calls were returned between the hours of 10 a.m. and approximately 5 p.m.

The limited reservations hours on weekends and holidays at the time of the review do not meet the requirements of §37.131(b)(1) of the DOT ADA regulations. Also, it is very unusual for a system as large as MARTA—which operates seven days a week—to rely on voicemail for taking trip requests on weekends and holidays.

Furthermore, the *Mobility Customer’s Guide* stated that:

Reservations are made on a first-come, first-served basis. Every effort will be made to accommodate requested pickup or drop-off times; however, the customer should be aware that due to demand at certain times of the day, a requested trip time may not be available. The reservation agent will attempt to negotiate an alternate trip time and will confirm a trip as close to the requested time as possible.

... Negotiating an alternate trip time is encouraged. Reservation agents may find it necessary to negotiate from a customer’s requested time plus or minus one (1) hour.

While it is acceptable for an agent to negotiate +/- one hour from a rider’s requested pickup time, the statement “the reservation agent will attempt to negotiate an alternate trip time and will confirm a trip as close to the requested time as possible” is unclear, however, as to what an eligible rider may expect when calling to book a trip..

5.7 Coordination with Adjoining Service Providers

When developing their paratransit plans, transit systems were required under Section 37.139(g) to include efforts to coordinate with transit systems with overlapping or contiguous service areas for paratransit riders who want to travel between service areas.

At the time of the review, there were three fixed route transit systems with service areas that overlapped MARTA’s service area. MARTA had arranged a transfer point for paratransit riders with each system, as listed in Table 5.1. These transfer points were also common locations for Mobility riders to get picked up or dropped off by family members.

Table 5.1 – Adjoining Fixed Route Systems and Transfer Points for Paratransit Riders

Transit System	Service Area (relative to MARTA)	Transfer Location for Paratransit Riders
Cobb County Community Transit (CCT)	North and Northwest	Cumberland Transfer Center (bus only)
Gwinnett County Transit (GCT)	North and Northeast	Doraville MARTA rail station
Clayton County Transit (C-Tran) Ceased operations	Southeast	College Park MARTA rail station

Riders were responsible for making reservations with each system's paratransit service for any trip that requires a transfer. Passengers also paid separate fares for trips on each paratransit system.

In general, Mobility and the other paratransit systems did not arrange "live hand-offs" of riders who are transferring, i.e., the first driver does not routinely wait for the second driver to arrive to deliver the rider. The Mobility dispatchers said that they did not believe it necessary, since the rail stations and bus transfer center offered shelter and lighting. They stated that the schedules for Mobility runs did not build in wait time at the transfer points. Furthermore, the driver manifests did not specifically note whether a trip involved a transfer to or from another paratransit system.

However, Mobility dispatchers said that they might make exceptions for cold or rainy weather. The dispatchers also said that they tried to hold a Mobility vehicle at the transfer point if the dispatcher from the rider's first portion of the transfer trip lets them know of the vehicle is late.

5.8 MARTA 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.

The review team examined the MARTA complaint process and files as part of the review. Information and complaint records were obtained from the DEO.

Complaint Policies and Procedures

Riders wishing to lodge a complaint about any MARTA services, including MARTA Mobility, could do so by calling, writing, faxing, or e-mailing the Customer Service Center (CSC). Contact information for the CSC was provided in the *Guide* and at www.itsmarta.com. CSC staff used Help Expert Assistance Tool (HEAT) software to record and track complaints.

MARTA classified complaints regarding general service issues as informal ADA complaints; more serious charges of civil rights discrimination were classified as formal ADA complaints. All Mobility activity was tagged in the HEAT system initially as informal ADA complaints. After a HEAT number had been assigned to the complaint, it was forwarded to the appropriate department for investigation and resolution. An investigator based at the Brady Avenue facility was dedicated to conducting all Mobility complaint investigations.

At the same time, all informal complaints were forwarded to DEO for review. A final determination as to whether it was an ADA complaint was made. ADA complaints were

assigned another tracking number and entered into DEO's ADA complaint tracking database. DEO staff then monitored and tracked the investigation and resolution of the issue.

DEO provided training for Customer Service Representatives (CSRs) and investigators in identifying, investigating, and resolving ADA complaints; DEO compiled and reported statistics on ADA complaints quarterly.

Resolution of informal complaint issues was the responsibility of the investigator. Complaints were either determined to be valid and chargeable to the driver, valid and not chargeable to the driver, or not valid. The investigator reported back to the CSR that initially received the complaint information about the complaint investigation and resolution. The CSR contacted the customer with information about the resolution and closed the complaint. The response to the customer usually matched the way in which the complaint was submitted; most responses were provided over the phone.

While written materials describing the MARTA's informal complaint processing procedures stated that efforts would be made to resolve informal complaints within 30 business days, DEO and Customer Service Center staff indicated that MARTA's goal was to resolve complaints within 7-10 business days. In cases that required additional time, the CSR contacted the customer to report on the status before the complaint was resolved.

DEO administered a separate process for formal ADA complaints, defined as written complaints of discrimination on the basis of disability that were submitted on MARTA's complaint form and sought a remedy to the perceived discrimination. Formal ADA complaints were directed to the Assistant General Manager (AGM) of DEO. A detailed investigation procedure was required for these complaints. Investigations were performed by a DEO Investigator. The procedure included a written report to the AGM within 30 business days, meetings between the AGM of DEO and the legal department and MARTA management to discuss the findings and recommendations, and a meeting with the complainant to discuss the findings, proposed resolution and right to appeal.

5.9 Findings

1. MARTA's policies, in the *MARTA Mobility Customer's Guide (Guide)* and other rider information stated that "Mobility's service mode remains curb to curb" despite a June 2007 MARTA general order that "operators must provide assistance beyond the curb to riders who make such a request or where a customer's disability or external conditions prevents them from reach the curb to board the vehicle or navigating the pathway from the vehicle to the entrance of their destination." At the time of the review, provision of such assistance appeared to depend upon riders making their needs known to drivers. To meet the requirements of §37.129(a) of the DOT ADA regulations, MARTA must revise its public information to inform applicants and eligible riders that this assistance will be provided when needed, due to disability, and how and when they are to request it. As described in Chapter 8 of this report, the revised policy must take into account that an eligible rider's need for assistance may vary depending upon the location, particularly if it is one to which the rider has not traveled previously. MARTA must ensure that personnel and contractors are trained

to proficiency on this policy and provide copies of the revised policy, procedure and public information to FTA. As discussed in Chapter 6 of this report MARTA must cease granting “curb-to-curb service only” as a type of conditional eligibility. This policy does not take into account that an eligible rider’s need for assistance may vary depending upon the location.

2. To meet its obligations under §§27.13(b) and 27.121(b) of the DOT ADA regulations MARTA must have procedures in place for keeping copies of complaints on file for one year and maintaining a summary of complaints on file for five years. Based on the information the review team provided to FTA, it does not appear that these obligations were discussed with MARTA staff. Please provide information on MARTA’s policies and procedures describing how these obligations are met.
3. As discussed in Chapter 8 of this report, according to a MARTA supervisor at the time of the review, MARTA did not always make timely revisions to its paratransit scheduling software in response to changes to the fixed route serve area and at times these revisions took several months. The delay meant that the Trapeze software incorrectly indicated that trips were ineligible when they actually were eligible and vice versa. Ensuring that revisions to the Trapeze polygons identifying the service area are made in a timely manner is the most thorough and accurate way of determining whether or not a trip is an eligible trip to meet the requirements of requirements of §37.131(a) of the DOT ADA regulations.

5.10 Recommendations

1. Work to strengthen coordination with other paratransit providers to serve riders, who because of their disabilities are not able to independently transfer to paratransit vehicles of other systems.

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, timelines for processing applications, recertification requirements, how appeals are handled, and how the process is described 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 applicants' functional ability. The review team also assessed timeliness of the processing of requests for eligibility and carried out the following tasks:

- Obtained information about the eligibility determination process through interviews with riders and advocates and a review of consumer comments on file at MARTA
- Developed an understanding of the handling and review of applications through an assessment of eligibility materials and interviews of eligibility determination staff
- Reviewed eligibility determination outcomes for the period of Month through Month Year
- Reviewed the application files of applicants denied ADA complementary paratransit eligibility
- Reviewed no-show policy and procedures

6.1 Customer Comments

None of the ten riders and agency staff contacted in advance of the on-site review indicated issues with the initial eligibility determination process. All indicated that the determinations seemed to be fair and accurate and that determinations were made within 21 days.

Some of those contacted, however, expressed issues with the recertification process. They stated that there did not seem to be a process in place for notifying riders that their eligibility was about to expire and that they needed to reapply. They indicated that they learned of the need to reapply from reservation agents when they were calling to schedule rides.

However, if riders did not call in to schedule rides because they only used the service for subscription trips, they would not find out that their eligibility was about to expire. They would get a letter when eligibility had expired, and the subscription trip would be taken off of the schedule.

Neither of the two formal complaints on file at FTA cited the eligibility process as an issue. Similarly, the review of complaints received by MARTA did not indicate concern with the eligibility determination process.

6.2 Eligibility Determination Procedures and Practices

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

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

Section 37.125(d) of the DOT ADA regulations states that determinations of eligibility must be in writing and if applicants are found to be ineligible, the determination must state the specific reasons for the decision. Appendix D to the regulations indicates that these reasons cannot be a simple recital that the person has been found to be able to use fixed route service. The specific reasons must relate to the regulatory criteria and MARTA's eligibility process. Decisions that deny or limit eligibility also must include information about the process for appealing the decision.

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

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

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

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

Section 37.127 of the DOT ADA regulations requires that paratransit service be made available to visitors who do not reside in the jurisdiction(s) served by the transit system. Visitors who present documentation that they are ADA paratransit eligible in the jurisdiction in which they reside are to be treated as eligible. For visitors with disabilities who do not present such documentation, the transit system may require documentation of the individual's place of residence and, if the individual's disability is not apparent, of his or her disability,

and must accept a certification by such individuals that they are unable to use the fixed route system.

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

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

Initial Determination Process

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

At the time of the review, MARTA determined ADA complementary paratransit eligibility based on a paper application. When individuals called and inquired about registering for the service, the Mobility Eligibility Specialist or one of the Mobility Service Agents explained the program to callers, took their names and addresses and sent them a cover letter and a four-page application form. Assistance with completing the application form was also offered. If the person asked for assistance, the staff reviewed the application form with them over the phone and filled out as much of the application as possible. The form was then sent to the applicant. The cover letter asked the applicant to check the information entered by staff, complete any information not addressed over the phone, and sign and return the completed application.

If application materials were requested and sent, MARTA staff entered the individual's name into an eligibility database and started the tracking process which allowed MARTA staff to determine the status of applications in the database.

A copy of the four-page application form and cover letter sent at the time of the review is provided in Attachment C. The application form requested the following information:

- General information such as name, address, phone number, etc.
- A description of the applicant's disability and whether the disability was temporary
- Statements about how the disability affected use of fixed route bus service and train service
- Whether environmental conditions or architectural barriers (such as hills, a lack of sidewalks, or a lack of curb-cuts) affected travel
- Whether the applicant was able to wait outside for a fixed route bus
- The maximum distance the applicant could walk unassisted
- The types of mobility aids used by the applicant

- If the applicant traveled with a service animal and, if so, the type of animal and the specific service it was trained to provide
- If the applicant traveled with portable medical equipment and, if so, the type of equipment
- The need for a personal care attendant
- Whether the applicant could climb steps and hold onto handrails for support
- How the applicant traveled and whether they had used the fixed route bus or train
- If the applicant had received training to use the bus or train
- If the applicant could use the bus or train if a paratransit van took them to and from stops/station

Finally, applicants were asked to identify a health care professional (with phone and fax numbers) who could verify their disability and functional limitations and applicants were asked to sign a release to allow the professional to provide medical information.

When a completed application was received, MARTA staff sent a cover letter and two-page “Health Care Professional Certification for MARTA Mobility Eligibility” form to the applicant’s named professional. The form asked:

- In what capacity the professional knew the applicant
- The date of the applicant’s last visit
- The diagnosis of disability
- The functional impacts of the disability on the applicant’s travel abilities
- Whether the disability was permanent or temporary
- If the disability was periodic (episodic) and the conditions that might cause it
- Whether the applicant could perform certain tasks such as give addresses and phone numbers, recognize landmarks or destinations, deal with unexpected situations, ask for, understand and follow directions, and safely travel through crowded/complex facilities
- The maximum distance the applicant could walk without assistance
- Whether the applicant could climb stairs and grip handrails
- The type or types of mobility aids used by the applicant
- If the applicant could use bus or train service
- If weather impacted the applicant’s ability to travel
- If the applicant required a personal care attendant

The letter asked the professional to respond within three days. A copy of a sample fax cover, cover letter, and professional certification form is also provided in Attachment C.

MARTA staff referred to the application form completed by the applicant as Part A. The professional verification form was referred to as Part B. If a completed Part A was received from an applicant, but the Part B professional verification form was not completed and returned, the Part B form was faxed to the professional again and a letter was sent to the applicant informing him that the professional did not provide the information requested and suggesting that the applicant contact the professional to make sure that verification form had been received.

According to MARTA staff, the letter also mentioned that if the applicant or professional did not respond within 30 days, the application file would be closed, although this language was not included in the samples provided to the review team. At the time of the review, MARTA staff stated that as long as the applicant indicated that he was still interested in pursuing eligibility, the file date was extended.

When both parts of the application had been completed, the Mobility Eligibility Specialist reviewed the information and made a determination. In some cases, telephone calls were made to applicants and/or professionals to clarify information in the application or to get additional information about the applicant's functional abilities.

Applicants found to be ADA paratransit eligible had to obtain a photo identification (ID) card (Breeze Card). Photo ID cards could be obtained at two locations in the area—the MARTA Five-Points rail station and the MARTA Lindbergh rail station—weekdays from 9 a.m. to 4 p.m. In addition to serving as an identification card for the Mobility paratransit service, the photo ID card allowed an individual to ride fixed route services free of charge. There was no charge for the card and MARTA provided fare-free transportation to the photo ID centers. However, a fare was charged for the return trip after a card had been obtained.

Since the trip to obtain a Breeze Card is part of the process to become eligible for and use the Mobility service, there must be no fare charged for either trip. The DOT ADA regulation under §37.5 prohibits the imposition of special charges on riders with disabilities. Appendix D at §37.125 explains that the paratransit eligibility process may not impose unreasonable administrative burdens on applicants, and, since it is part of the entity's nondiscrimination obligations, may not involve "user fees" or application fees to the applicant."

MARTA staff indicated that while the *MARTA Mobility Customer's Guide (Guide)* and eligibility determination letters indicated that the Mobility Breeze Card was required to use the service, the practice was that individuals could use the service without this photo ID. Once applicants were determined eligible and letters were sent, their names were entered into the Trapeze system and they could begin calling and booking rides.

Recertification Policies and Procedures

The standard term of eligibility was two years. Shorter periods of eligibility were granted if the disability was temporary and prevented fixed route travel for a shorter period of time.

MARTA staff indicated that the Trapeze system provide a pop-up screen to alert reservation agents 14 days before riders' eligibility was to expire. If a rider whose eligibility was to expire called to book a ride, this pop-up screen alerted the agent who alerted the rider. Once the trip had been booked, the agent also transferred the rider to the Eligibility Department. Staff then sent out a new application form and extended the rider's eligibility in the system for 30 days to allow for the recertification process to be completed.

The procedure described above worked for riders who regularly called to book trips, but was not sufficient to alert riders who only used subscription service. MARTA eligibility staff indicated that they had implemented a separate procedure to identify and alert subscription riders. Each

Monday, the Mobility Eligibility Specialist ran a Trapeze query designed to identify subscription riders whose eligibility would expire within 45 to 60 days. New application forms were sent to these riders. If eligibility would expire within 30 days, new application forms were sent and the riders were called.

Visitor Eligibility

Section 37.127(e) of the DOT ADA regulations requires that:

“A public entity shall make the service to a visitor required by this section available for any combination of 21 days during any 365-day period beginning with the visitor’s first use of the service during such 365-day period.”

Section 37.127(d) of the DOT ADA regulations also requires that visitor eligibility be granted to individuals with disabilities who do not have documentation of being determined ADA paratransit eligible by another transit system. This section states that:

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

Page 26 of the *Guide* detailed visitor eligibility. It noted that 21 days of service was provided each year to visitors with disabilities. It noted that individuals must provide “proof of disability when boarding the vehicle” and that ADA paratransit certification from other transit systems is honored.

Section 37.127(d) of the DOT ADA regulation states that documentation not be required of visitors whose disability is “apparent.” Documentation can only be required of visitors whose disability is not “apparent.” If a visitor’s disability is “apparent,” MARTA cannot require proof of disability.

Eligibility Determination Outcomes and Letters

Sections 37.125 (d) and (e) of the DOT ADA regulations require that letters of determination include the following five points of information:

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

This section also requires that determinations of eligibility be in writing, and if applicants are found to be ineligible, the determination must state the specific reasons for the decision.

Appendix D to the regulations indicates that these reasons cannot be a simple recital that the

person has been found to be able to use fixed route service. Decisions that deny or limit eligibility also must include information about the process for appealing the decision.

At the time of the on-site visit, there were 6,086 individuals in the MARTA Mobility system that had been granted ADA paratransit eligibility. Determination records for calendar year 2008 indicated that 3,426 completed applications had been received, about 286 per month. About 18 percent of applicants determined eligible were granted unconditional eligibility and about 81 percent were granted conditional eligibility. A total of 186 applicants (about 5 percent) were found able to use the fixed route system under all conditions and were denied ADA paratransit eligibility.

At the time of the review, if an applicant indicated that she could only independently travel one half of one block to get to or from bus stops, MARTA stated that it granted her conditional eligibility for trips when bus stops were more than a half block away, rather than granting her unconditional eligibility. It appeared to the review team that this practice led to the relatively high percentage of conditional determinations. The review team's analysis of a sample of 15 conditional determinations showed that this stated practice was not always followed. As described in section 6.3 below, three of the applicants who indicated they could walk no more than one block were denied eligibility outright. The lack of required specificity in the denial letters prevented the review team from determining the reasons for the denials.

Section 37.125(d) of the DOT ADA regulations requires that letters or other documentation of ADA paratransit eligibility include the following information:

- An indication that the documentation is for “ADA Paratransit Eligibility”
- The name of the applicant
- The name of the transit agency making the determination
- The telephone number of a MARTA Mobility person who can be contacted by other systems to verify eligibility
- An expiration date
- Any conditions of eligibility
- Whether the applicant is approved to travel with a personal care attendant

Sample letters used by MARTA to grant eligibility were obtained and reviewed. The letters did not include information about whether the rider was authorized to travel with a PCA. MARTA staff indicated that any eligible rider could indicate during the trip reservation process that they would be traveling with a PCA.

Letters granting conditional eligibility specified whether “curb-to-curb service” or “feeder service” would be provided. As mentioned below and in Chapter 5 of this report, these letters will need to be revised.

A sample letter granting conditional eligibility that inappropriately linked certain conditions to “feeder service” or “curb-to-curb service” and trip purpose (chemotherapy and radiation treatments) is provided in Attachment D. The overall determination ought not to have been tied to a specific trip purpose. The appropriate determination would have been to grant conditional eligibility for trips when severe fatigue prevented use of fixed route service.

Conditional eligibility and trip-by-trip eligibility form a two-stage process. First, in conditional eligibility, the transit agency assesses an individual's functional ability to use the fixed route transit system. Second, in trip-by-trip eligibility ("trip eligibility") the transit agency applies the individual's conditions to his or her specific trips, based on the actual origin and destination. In doing trip eligibility, transit agencies consider environmental and other conditions, such as the path of travel to and from the bus stops, for every trip request.

As discussed in Chapter 5 of this report, depending upon how MARTA chooses to implement door-door service, when needed due to disability, the decision on whether door-to-door or curb-to-curb service will be provided for a particular trip could be a decision made in the trip-by-trip process, or in the reservation process. At the time of the review, MARTA stated that it had not implemented trip eligibility.

The sample denial letters and letters granting conditional eligibility did not state the specific reasons for the decision; the conditional eligibility letter inappropriately required the filing of a written appeal

Given constraints on resources at the time of the on-site visit, MARTA was considering implementing trip-by-trip eligibility ("trip eligibility") and feeder service. The Mobility Eligibility Specialist stated that the conditions of eligibility were not imposed during the trip reservations process and that all riders granted conditional eligibility were permitted to book trips and receive service as if they had been granted unconditional eligibility; the Eligibility Specialist also stated that feeder service had not yet been implemented.

Origin to destination service and the requirement that assistance beyond the curb must be provided if needed due to disability was discussed in Chapter 5 of this report. Depending on how MARTA decides to meet the requirement to provide assistance beyond the curb when needed due to disability, the language in the eligibility determination letters and in the *Guide* may need to be revised. For example, if MARTA decides to use the eligibility process to assist in determining if riders always need assistance beyond the curb, the letters for those riders might need to be changed to indicate that door-to-door service will be provided. For other riders who may only need assistance beyond the curb at certain locations, the letters would be changed to indicate "curb-to-curb service with assistance beyond the curb when needed and requested" or language to that effect.

The review team also discussed feeder service with MARTA staff. While the eligibility determination letters implied that only feeder service would be provided when inaccessible path-of-travel and distance issues prevented use of the fixed route system, feeder service may be appropriate for only a small percentage of these trips. Also, determinations granting only feeder service would mean that riders would be provided feeder service at both ends of the fixed route portions of their trips. In FTA's experience, using this type of "double feeder" service is a significant operational challenge and is very seldom used. In addition, special attention is required to ensure that feeder service even if only for one end of the trip does not result in excessively long total travel times. Therefore, in implementing feeder service, MARTA may find that it is operationally feasible only for relatively long trips and only when one end of the trip is close to fixed route so that feeder service is only needed on one end.

With respect to feeder service, Appendix D to the DOT ADA regulations explains

For persons in the second eligibility category (e.g., persons who can use accessible buses, but do not have an accessible bus route available to take them to their destination), origin-to-destination service can be used. Alternatively, the entity can provide either of two other forms of service. One is on-call bus, in which the individual calls the provider and arranges for one or more accessible buses to arrive on the routes he needs to use at the appropriate time. On-call bus service must meet all the service criteria of Sec. 37.131, except that on-call buses run only on fixed routes and the fare charged can be only the fixed route fare that anyone pays on the bus (including discounts).

The second option is "feeder paratransit" to an accessible fixed route that will take the individual to his or her destination. Feeder paratransit, again, would have to meet all the criteria of Sec. 37.131. With respect to fares, the paratransit fare could be charged, but the individual would not be double charged for the trip. That is, having paid the paratransit fare, the transfer to the fixed route would be free.

For persons in the third eligibility category (e.g., persons who can use fixed route transit but who, because of a specific impairment-related condition, cannot get to or from a stop), the "feeder paratransit" option, under the conditions outlined above, is available. For some trips, it might be necessary to arrange for feeder service at both ends of the fixed route trip. Given the more complicated logistics of such arrangements, and the potential for a mistake that would seriously inconvenience the passenger, the transit provider should consider carefully whether such a "double feeder" system, while permissible, is truly workable in its system (as opposed to a simpler system that used feeder service only at one end of a trip when the bus let the person off at a place from which he or she could independently get to the destination). There may be some situations in which origin to destination service is easier and less expensive.

Eligibility determinations must not limit eligibility to feeder service only. It would be more appropriate to state the conditions of eligibility as these are conditions related to functional ability and the results of MARTA eligibility process which the rider has the right to appeal and then discuss separately in the letter of determination the fact that MARTA may sometimes decide to provide feeder service.

Appeal Process

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

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

If applicants appealed the initial determination, the Mobility Eligibility Specialist first conducted an informal review of the decision. This sometimes involved a follow-up telephone conversation with the applicant to discuss the decision. This informal review did not, however, replace the requested formal appeal. Staff stated that during these calls, additional information was often obtained and that it was very common that the initial decision was revised.

If a formal appeal was needed, it was heard by a five-person panel comprised of members of the Elderly and Disabled Advisory Committee (EDAC). Different members of the committee heard appeals and served on the Appeals Subcommittee on a rotating basis. Finally, if the applicant was not satisfied with the outcome of the first formal appeal, he or she could appeal to a three-member panel made up of MARTA's Assistant General Manager of Operations, Assistant General Manager of Diversity and Equal Opportunity, and Assistant General Manager of Customer Service.

At the time of the review, the Mobility Eligibility Specialist stated that there had been no formal appeals before the appeal panel in the past few years.

6.3 Observations

Review team members examined the files of 30 applicants and discussed each determination with the Mobility Eligibility Specialist. The files included 15 applicants found not eligible and 15 applicants granted conditional eligibility.

All 15 conditional eligibility determinations appeared to be appropriate. Applicants indicated that they could use fixed route service under certain conditions and conditional eligibility appeared applicable. In 11 of the cases, though, applicants indicated maximum walking distances of less than one block and eligibility was granted if getting to bus stops or rail stations required a walk than one-half block. Given that relatively few trips would have bus stops no more than one-half block from both the origin and the destination, it might have been reasonable in these cases to grant unconditional eligibility, particularly since MARTA staff stated at the time of the review that it had not yet implemented trip eligibility,.

Decisions seemed appropriate in 12 of the 15 cases where eligibility had been denied. In each case, the applicant did not identify barriers that prevented fixed route use and also indicated that the applicants used the fixed route system. The professional verification forms also indicated that travel by fixed route was not prevented.

In three cases where applicants had been denied, though, there were some questions about the determinations. In one case, the applicant indicated severe cardio-pulmonary disease and the use of portable oxygen. The professional indicated that fixed route use was prevented and that the person could be expected to travel only one block. In a second case, the applicant indicated recent foot surgery and the use of a walker and cane. It appeared that temporary eligibility would have been appropriate in the second case.

In the third case, the applicant reported degenerative joint disease, arthritis in both hips, the use of a support cane, and an ability to walk only one block. The professional confirmed pain when walking and a maximum walking distance of one block. Interestingly, however, the professional answered “No” to the questions “Does the applicant’s disability prevent the applicant from riding the rail system?” and “Does the applicant’s disability prevent the applicant from riding the regular accessible bus?” Follow-up contact with the professional to clarify this apparent conflicting information would have been appropriate before a decision was made to deny eligibility.

The last case mentioned above indicated a possible problem with the wording of questions in the professional verification form. In a number of instances, professionals verified significant disabilities and distance or path-of-travel issues, but then indicated that the applicant was not prevented from “riding the rail system” or “riding the regular accessible bus.” It is possible that when answering these questions, professionals are thinking only of “riding” the fixed route and not of getting to and from the fixed route system. These questions in the professional verification form should probably ask whether the applicant’s disability prevents the applicant from getting to or from or riding the rail and bus systems.

Review of Application Processing Times

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

In addition to examining determinations made, the review team analyzed the processing time for determinations. The database MARTA used to track application processing captured the date that Part A of the application was received, the date that the professional verification form (Part B) was sent to the named professional, the date that Part B was returned, and the date that the final determination was made. A special report with this information was prepared for all determinations made from January 2008 through January 2009. Application processing times were then calculated for 156 randomly selected determinations made during this period. The application processing times are summarized in Table 6.1 below.

Table 6.1 – Processing Times for 152 Sample ADA Paratransit Eligibility Applications

Number of Days Between Completed Application and Final Determination	Number of Determinations	Percentage of All Determinations
1-7 Days	0	0%
8-14 Days	115	74%
15-21 Days	41	26%
22+ Days	0	0%
Totals	156	100%

As shown, 115 of the 156 determinations (74 percent) were made in eight to 14 days after the receipt of both Part A and Part B of the application. The remaining 41 determinations (26 percent) were made between 15 and 21 days after the receipt of a completed application. None of the 156 randomly selected sample determinations took longer than 21 days.

The analysis of the data also indicated that MARTA sent the Part B form to professionals promptly and that MARTA did not delay the process by assuming responsibility for requesting information from professionals. In 152 of the 156 cases analyzed, the Part B form was sent to the professional identified by the applicant on the same day that Part A was received from applicants. In the other four cases, Part B was sent out within one day, three days, four days, and five days.

Page 9 of the *Guide* noted that MARTA must process completed applications within 21 calendar days of receipt.

No-Show Suspension Policy

Section 37.125(h) of the DOT ADA regulations states that transit agencies “may establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit service to ADA eligible individuals who establish a pattern or practice of missing scheduled trips.” FTA has permitted transit systems to regard late cancellations as no-shows if and only if they have the same operational effect on the system as a no-show, generally less than 1–2 hours of the scheduled trip time.

As specified in §37.125(h)(1), trips missed by riders for reasons beyond their control, including trips missed due to operator or transit system error, cannot be a basis for determining that such a pattern or practice exists. Appendix D to this section describes a “pattern or practice” as involving “intentional, repeated or regular actions, not isolated, accidental or singular incidents.” The review team assessed MARTA’s policies and practices regarding no-show suspensions.

Page 21 of the *Guide* indicated that vehicle drivers must wait at least five minutes within the pickup window before departing and recording riders as no-shows. Page 30 then indicated that riders will be charged with no-shows if any one of the following occurred:

- The rider is not at the scheduled pickup location at the scheduled pickup time and fails to board the vehicle within five minutes of the arrival of that bus.
- The rider cancels a scheduled trip within two hours of the scheduled pickup time (also called a “Late Cancel”).
- The rider chooses not to ride after the vehicle arrives for the scheduled pickup (also called a “Cancel at Door”).

It was noted that the *Guide* did not indicate that no-shows will only be charged against riders if they fail to board or cancel at the door when the vehicle arrives within the pickup window. If vehicles arrive late and riders do not board, this should be counted as a missed trip and not as a no-show.

MARTA Mobility staff sent riders postcards after each recorded no-show. The postcards let riders know that they had been charged with no-shows, indicated the date and time of each no-

show, and provided the rider the opportunity to dispute the no-show if there were “extenuating circumstances.”

“Warning” letters were then sent if riders have two no-shows in a six-month period. These letters informed riders that they could be suspended if they incurred two more no-shows in the same six-month period.

MARTA’s policy called for a 14-day suspension if riders accumulated four no-shows in a floating six-month period. If after this first suspension a rider accumulated another four no-shows in a subsequent six-month period, the policy called for a 30-day suspension. The policy also called for a six-month suspension from service if riders accumulated 12 no-shows within a floating 12-month period of time.

It was noted that the policy did not take the frequency of use into consideration. For example, a rider who used the service 10 times a week to go to and from work every weekday would make at least 260 trips in a six month (26 week) period. Four no-shows for a rider using the service this often would amount to only one and a half percent of all scheduled trips. This low rate of no-shows would be less than the system average and would not constitute a “pattern or practice” of missing scheduled trips.

At the time of the on-site visit, MARTA Mobility staff indicated that the no-show suspension policy was not being enforced and noted that the policy was being reviewed with the EDAC.

Findings regarding MARTA’s no-show suspension policy at the time of the review are found in Chapter 9.

6.4 Findings

1. At the time of the review, MARTA did not charge a fare when approved applicants traveled to designated locations to obtain the Mobility Breeze Card photo ID. However, MARTA charged a fare for the return trip. The DOT ADA regulation under §37.5 prohibits the imposition of special charges on riders with disabilities. Appendix D at §37.125 explains that the paratransit eligibility process may not impose unreasonable administrative burdens on applicants, and, since it is part of the entity’s nondiscrimination obligations, may not involve “user fees” or application fees to the applicant.” Since the trip to obtain a Breeze Card is part of the process to become eligible for and use the Mobility service, MARTA is prohibited from charging a fare for either trip. MARTA must revise public information to remove the statement that a fare will be charged for the return trip, direct employees to cease imposing these charges and provide a copy of the directive and revised public information to FTA.
2. At the time of the review, public information stated that MARTA must process applications within 21 days. Based on the information provided to FTA, it is unclear if and how applicants were made aware of the right to presumptive eligibility. To meet the requirements of §37.125 c of the DOT ADA regulations, MARTA must revise its public information to inform applicants and prospective applicants that if MARTA has not made an eligibility determination within 21 calendar days of

receiving a complete application, presumptive eligibility will be provided on the 22nd day until and unless MARTA denies the application. Please provide to FTA copies of revised or current public information to FTA. If MARTA requires applicants to obtain a Breeze card before using Mobility service, MARTA must allow adequate time for the Breeze card to be obtained, so the applicant can begin using the system on the 22nd day. As part of MARTA's response to this finding, FTA requests a justification for "closing" the applicant's file if either the applicant or the medical professional do not respond within 30 days, and the rationale for omitting this consequence from letters sent to both.

3. At the time of the review, required information was missing from all sample eligibility determination letters provided to the review team, and it appeared that a letter granting temporary eligibility was not requested or provided. To meet the requirements of the DOT ADA regulations under §37.125(d), MARTA must revise its eligibility determination letters that deny eligibility and those granting conditional or temporary eligibility to state the specific reason(s) for the finding. As explained in Appendix D of the DOT ADA regulations, in the case of a denial "the reasons must specifically relate the evidence in the matter to the eligibility criteria of the rule and of the entity's process. Appendix D also states that determination letters must include information on the applicant's use of a personal care attendant (PCA). If MARTA intends that any eligible rider may ride with a PCA, language to that effect would be included in the determination letter. As part of MARTA's response to this finding, submit actual letters that MARTA considers representative and submit them to FTA for review, after redacting the applicant's personal information.
4. The professional verification form and cover letter in use at the time of the review raised concerns that MARTA's process may not have solicited adequate information to permit MARTA to make thorough and accurate eligibility determinations, may not have considered the inaccessibility of bus stops and/or may not have adequately considered the ability of applicants whose functional limitation is getting to or from fixed route bus and rail service. To meet the requirements of §37.123(e)(3), MARTA's eligibility process must consider the inaccessibility of bus stops as a potential barrier even after its fixed route bus fleet is "100% accessible" and must consider inability to get to and from fixed route bus and rail service to be a functional limitation. This information is essential to make thorough and accurate determinations of conditional eligibility, as MARTA's eligibility process did not include functional assessments while MARTA stated it was considering implementing feeder service. Two of the questions appeared to focus only on "riding" the rail and bus systems. As part of MARTA's response to this finding, revise the professional verification form and cover letter and provide copies to FTA.
5. While determinations to deny eligibility appeared appropriate in 12 of the 15 cases reviewed, the lack of required specificity in the denial letters prevented the review team from ascertaining the possible reasons for three of the denials. As described in detail in Chapter 6 of this report, all three applicants appeared to be candidates for some level of eligibility. In one of the three cases, follow-up with the named professional was needed to resolve conflicting statements on the professional verification form. Based on information provided to FTA, this failure to follow up

- with the applicant or the named professional may also have prevented MARTA from determining applicants' functional abilities and establishing conditions based on factors typically encountered outdoors (such as distance, environmental factors, inaccessible paths of travel or bus stops, and terrain). The apparent failure to consider these functional abilities and architectural and environmental barriers suggest that MARTA's process denied eligibility to applicants who should have been determined eligible for at least some level of ADA paratransit service.
6. At the time of the review, MARTA inappropriately granted applicants receiving chemotherapy and radiation treatments conditional eligibility to/from chemotherapy and radiation treatments only. MARTA did not permit these riders to make reservations for other trips. This policy does not meet the requirements under § 37.131(d) of the DOT ADA regulations and MARTA must cease restricting eligibility based on trip purpose. MARTA must inform similarly-situated riders whose eligibility has been linked to trip purpose that they may reapply for eligibility. As part of MARTA's response to this finding, please submit an example of letters and/or other public information sent to these riders informing them of the right to reapply.
 7. At the time of the review, the lack of required specificity in the sample letters described in finding #6 above also prevented the review team from confirming staff statements that MARTA had not yet implemented trip-by-trip eligibility ("trip eligibility") and that conditionally eligible riders could use Mobility as if they had unconditional use of the service. To meet the requirements under §37.125 of the DOT ADA regulations, MARTA must revise its eligibility process to first either grant conditional eligibility to applicants who are able to use fixed route under some conditions, or it must grant unconditional eligibility to these applicants. The conditional eligibility determination letter must identify the applicant's functional limitations and the environmental conditions that prevent the applicant from using fixed route. In the determination discussed in finding #6 above, the conditional eligibility letter should list the condition as severe fatigue, if that was the condition that prevented fixed route use. Next, in trip-by-trip eligibility ("trip eligibility"), MARTA must apply the individual's conditions to his or her specific trips requests based on the trip origin and destination and must do so for every trip request to determine whether or not the trip is to be taken on Mobility or on fixed route service.
 8. As part revising conditional eligibility determination letters, MARTA must cease granting "feeder service only" to those applicants it determines are prevented from getting to or from bus stops because of their disability. To meet the requirements of §37.125 of the DOT ADA regulations, MARTA's eligibility determinations granting conditional eligibility must specify conditions or limitations on the individual's eligibility, for the reasons described in the previous findings, as conditions related to the eligibility criteria and the results of MARTA eligibility process regarding the applicant's functional ability are those which the rider has the right to appeal. While feeder service may be appropriate for some of the trips to be taken by eligible riders—depending on the rider's functional limitations and the length of the comparable fixed route trip (among other factors) – offering only feeder service for all trips that may be requested by these riders during the rider's entire term of eligibility may be inappropriate. Depending upon how MARTA chooses to

operationalize feeder service, the decision on whether to provide feeder service may be a trip-by-trip determination process, which MARTA had not implemented at the time of the review. The fact that MARTA may sometimes decide to provide feeder service should be discussed in the determination letter separately from the conditions placed on the applicant's eligibility.

9. At the time of the review, MARTA had no information to provide to the review team on the number of appeals requested, decisions reversed, decisions upheld, and decisions remanded to MARTA for reconsideration; staff stated that there had been no appeals before the Elderly & Disabled Access Advisory Committee in the past few years. At the same time, MARTA stated that if applicants called to discuss the decision, staff often obtained new information, and very frequently revised the initial decision. One concern is that MARTA may have made revisions to determinations on a case- by case-basis only, rather than also tracking the revisions in its database to identify any patterns of decisions that are frequently revised to ascertain the information needed to enable staff to make more accurate determinations during the initial determination process. Tracking this information is important in the event that a complaint is filed with MARTA and or with FTA.
10. To meet its obligations under §37.125(g)(2), MARTA must cease requiring applicants to prepare a written statement to appeal and establish an appeal process that includes an opportunity for a hearing. At the time of the review, MARTA inappropriately required those granted conditional eligibility to file a written appeal as a precursor to a hearing. Based on the information the review team provided to FTA, it is unclear as to whether applicants denied eligibility or those granted temporary eligibility were also inappropriately required to file a written appeal. As part of MARTA's response to this finding, FTA requests information on the reporting relationship(s) between the individual(s) involved in making eligibility determinations and the Eligibility Specialist identified in the appeal process, so that FTA can determine whether or not the appeal process guarantees the requisite separation of function. MARTA must direct staff to cease requiring written appeals, revise its eligibility material, denial, temporary and conditional letters and public information to remove requirements for a written appeal and to reflect the hearing process. The practice of requiring applicants to prepare a written appeal as a precursor to obtaining the required opportunity to be heard and to present arguments and information is a prohibited unreasonable administrative burden. The practice could also dissuade applicants from exercising their appeal rights. If MARTA elects to prepare the one-page appeal form described in recommendations section 6.5, please provide a copy to FTA.
11. At the time of the review, MARTA provided visitor eligibility to visitors who presented documentation of ADA paratransit eligibility from other transit system or who provided some other documentation of disability. To meet the requirements of §Section 37.127(d) of the DOT ADA regulations MARTA must revise its visitor eligibility process. Documentation cannot be required of visitors whose disability is apparent. Documentation can only be required of visitors whose disability is not apparent. MARTA must accept a certification by such individuals that they are unable to use the fixed route system. MARTA must revise its visitor eligibility process.

6.5 Recommendations

1. Consider sending out reminders of the need to reapply for Mobility service, as expiration dates approach. While MARTA did not automatically send out notices to riders whose ADA paratransit eligibility was about to expire to remind them to reapply, it had developed several procedures for staff to review records and make telephone and written contacts as needed.
2. Revise procedures to include follow up by phone or fax with applicants and professionals, especially if there are inconsistencies among responses to questions on the professional verification form or on written application forms, particularly before making decisions to deny eligibility outright. Conducting follow up with professionals will facilitate MARTA's making more thorough initial determinations, provide additional information about an applicant's functional ability if the applicant appeals the decision and will inform MARTA if questions on the professional verification form are unclear to some professionals.
3. Consider utilizing professionals who are trained to conduct physical functional assessments, such as physical or occupational therapists, to conduct ADA paratransit eligibility assessments as part of the eligibility determination process. In the absence of a complete functional assessment, MARTA staff should consider abilities and limitations indicated by professionals named by applicants. MARTA staff should follow-up with applicants and professionals before discounting the information provided by professionals and basing decisions on the information in the paper application.
4. MARTA should consider that many persons with cancer experience severe fatigue on non-treatment days and/or throughout the day on treatment days.
5. Create a one-page notice of appeal form for applicants to sign and return to MARTA to indicate their intention to appeal MARTA's denial or determination of conditional or temporary eligibility. The form may contain check boxes for applicants to indicate if they are appealing a denial of eligibility or a decision granting conditional eligibility and they feel that they should have been granted unconditional eligibility.
6. As part of revising public information, consider clarifying the need for the Breeze card.

7 Telephone Access

Telephone access for placing or changing trip reservations or for checking 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.

Section 37.131(b) of the DOT ADA regulations requires that service must be scheduled and provided at any requested time in response to a request for service made the previous day. Requests must be accepted during normal business hours, even on days that the agency may not otherwise be providing service, such as trip requests taken on Sunday for a trip on the following Monday. In addition, the prohibition on capacity constraints contained in §37.131(f) prevents a transit system from establishing any operational pattern or practice that significantly limits the availability of service. This chapter summarizes the review team's observations of the telephone system used for placing, changing, or confirming trip reservations or checking on the status of a ride.

The review included:

- Conducting telephone interviews with riders, agency staff assisting riders and advocates
- Reviewing MARTA's standards for telephone performance
- Obtaining information from MARTA staff concerning the design of the phone system and on staffing levels in reservations and dispatch
- Observing practices for handling calls to reservations and dispatch

7.1 Customer Comments

All 10 of the riders and service agency staff contacted in advance of the review indicated that telephone hold times were very reasonable when calling to book a ride. Several, however, indicated issues when calling to check on the status of a late ride. They indicated long initial hold times and secondary holds. One individual cited a secondary hold of 40 minutes. Long hold times and long hold times when calling to check on the status of rides were also mentioned in both of the formal complaints on file at FTA.

Some concerns were expressed about the trip reservations process on weekends. To place a trip request on the weekends, riders needed to leave a message in a voice mail box for someone to call them back to schedule the ride. The process was felt to be cumbersome by four of the individuals contacted in advance. Two of the four indicated that they sometimes did not receive a return call when they left a message.

Complaints on file at MARTA indicated some concerns about telephone performance. Long hold times were mentioned 34 times in complaints received by MARTA between January and December 2008. This represented 1.9 percent of the issues cited during this time frame. Long telephone hold times were also mentioned 10 times in complaints received in December 2008, which represented 6 percent of all concerns. All of these complaints were related to the line for checking on late rides (ETA line).

7.2 Phone Service Standards

The formal standards established by MARTA for telephone performance and in effect at the time of the review were:

- Average time on hold for calls made to the reservations office:
 - 60 seconds or less (target)
 - 61-90 seconds (needs improvement)
 - >90 seconds (fails to meet standard)
- Abandoned call rate for calls made to the reservations office:
 - 3.5 percent or less (target)
 - 3.6-7.0 percent (needs improvement)
 - >7.0 percent (fails to meet standard)

The standards specified neither a target percentage of calls that MARTA expected to be handled nor the percentage of the time the standards were to be achieved; the standards did not specify if the average hold time of 60 seconds applied to each hour of the day, each total day of service, or an average for the month. .

While on site, the review team found that MARTA tracked the average hold time for calls to the reservations office and the number and percentage of calls that were on hold for less than three minutes, three to five minutes, and over five minutes.

7.3 Phone System Design and Staffing

At the time of the review, MARTA utilized a Nortel telephone system, with 48 incoming trunk lines dedicated to the Mobility reservations office. The overall system included a Symposium Call Center ACD system and a Witness digital recording system, both of which were used for weekday calls to the reservations office and outgoing calls made on weekends.

To access the reservations office, customers had a number of alternatives.

1. Dialing 404-848-5826 on weekdays would connect directly to the reservations office. A separate number, 404-848-6400, was used to access voice mail for reservations on weekends, as explained in more detail below. If a customer dialed 404-848-5826 on a weekend, however, the call goes to 404-848-6400).
2. From the main MARTA number, 404-848-5000, a caller could choose Option #2 for Mobility. Additional menu options from that point allow the caller to select Eligibility (1), Reservations (2), or ETA (3).
3. 404-848-4212, the ETA line, also presented callers with a menu of options, including ETA (1), Eligibility (2), Reservations (3), to get information about a trip or cancel a trip (4), to speak with a dispatcher for Mobility vehicle drivers (4), and Customer Service (5).
4. 404-848-5389, Eligibility, offered the following options: MARTA information (1) and Mobility information (2). Additional menu options under Mobility information included Eligibility (1), Reservations (2), and ETA (3).

The reservations office was fully staffed from 8:30 a.m. until 5 p.m. on weekdays. All reservation agents were full time and worked the full day.

The Automatic Call Distributor (ACD) assigned calls to a reservation agent based on the length of time that the agent had not answered a call, first assigning a call to the agent who had been available the longest. While the reservations office did not use the electronic queue display system as the Customer Service Center did, reservation agents were able to display the current queue on their phone.

If a call to the reservations office was on hold for three minutes, the caller was given the option of leaving a voice mail message. MARTA stated that a reservation agent would call any customer who left a message back by close of business the same day.

Customers were not able to place trip requests directly with a reservation agent on weekends or holidays. Trip requests for next day service could be left on voice mail on Saturdays, Sundays, and holidays. Page 12 of the *Guide* indicated “When you call, you will be asked to leave your name and phone number and your call will be returned within the hour. “

Reservations Staffing

At the time of the review, the reservations staff included eight full-time reservation agents and a supervisor. The work schedules of the reservations staff are shown in Table 7.1.

As Table 7.1 shows, eight reservation agents were on duty Monday, Tuesday, and Friday; seven reservation agents were on duty on Wednesday and Thursday, when call volumes were typically lower. Shifts were not staggered; all reservationists scheduled to work on a particular day are on duty from 8:30 a.m. until 5 p.m.

Each reservation agent took a one-hour lunch break and two 15-minute breaks. Lunch breaks and 15-minute breaks were staggered to minimize the impacts of reduced staffing at those times.

On Saturdays and Sundays, one reservation agent was on duty from 10 a.m. until 4 p.m. to call customers who had left voice mail messages requesting a trip for Sunday or Monday. On Sundays, when call volumes were typically high, an additional reservation agent was sometimes on duty between approximately noon and 4 p.m. to assist with return calls. On holidays, a Saturday and Sunday staffing schedule was used.

Dispatch and ETA Staffing

At the time of the review, the Mobility staff included six ETA agents. Either 2 or 3 agents were on duty during peak hours, and one or two agents were on duty at other times.

Table 7.1—MARTA Mobility Reservationists' Work Schedules

Staff	Monday	Tuesday	Wednesday	Thursday	Friday	1st Break	Lunch	2nd Break	Saturday	Sunday
Reservationist #1	8:30 – 5:00	8:30 – 5:00	Off	Off	8:30 – 5:00	10:45-11:00	1:00 – 2:00	3:00 – 3:15	10:00 – 4:00	10:00 – 4:00
Reservationist #2	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	9:45 – 10:00	11:00 – 12:00	1:30 – 1:45	Off	Off
Reservationist #3	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	10:30 – 10:45	12:30 – 1:30	2:30 – 2:45	Off	Off
Reservationist #4	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	10:50 – 11:05	12:15 – 1:15	2:30 – 3:05	Off	Off
Reservationist #5	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	11:30 – 11:45	2:00 – 3:00	4:00 – 4:15	Off	Off
Reservationist #6	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	10:30 - 10:45	1:00 – 2:00	3:30 – 3:45	Off	Off
Reservationist #7	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	9:30 – 9:45	11:00 – 12:00	1:30 – 1:45	Off	Off
Reservationist #8	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	8:30 – 5:00	10:05 – 10:20	12:00 – 1:00	2:15 – 2:30	Off	Off
Total staff on duty	8	8	7	7	8				1	1

7.4 Telephone Performance

Performance Reports

Telephone hold time reports for January 2009, generated by the Symposium Call Center ACD system, were obtained and analyzed.

Mobility Reservations Office—Weekdays

A total of 16,109 calls were received in the reservations office in the month of January 2009. Of those calls, 12,412, or 77 percent, were answered. The average hold time for those calls was one minute and 29 seconds, which exceeded MARTA's hold-time standard of no more than 60 seconds on average. The maximum hold time for calls answered in the reservations office during the month was 13 minutes and 44 seconds. The remaining 23 percent were either not answered because they were made before or after office hours or because the calls were abandoned.

During the month, 7,721 answered calls, or 62 percent, were on hold for 60 seconds or less and met MARTA's hold-time standard. Another 747 calls, or six percent, were on hold for 61-90 seconds, the "needs improvement" category of MARTA's standard. Finally, 3,944 calls, or 32 percent, were on hold for more than 90 seconds, and "failed" MARTA's standard for acceptable performance.

The review team also used Symposium report data to compare hold times for the calls answered during the month of January to the standard MARTA used to measure phone system performance in the "Mobility Reservations Weekly Status Report" and the quarterly ADA performance reports prepared by DEO. The results were as follows:

- Less than three minutes: 9,983 calls, or 80 percent of answered calls
- Three to five minutes: 1,252 calls, or 10 percent of answered calls
- More than five minutes: 1,177 calls, or nine percent of answered calls

Daily hold time data for calls answered in the reservations office during the week of January 26-30, 2009, was also reviewed and is reported in Tables 7.2 and 7.3.

**Table 7.2 – Telephone Hold Times by Day, Week of January 26-30, 2009,
Mobility Reservations Office**

Day and Date	Calls Answered	Calls Abandoned		Average Hold Time (min:sec)	Maximum Hold Time (min:sec)	60 Seconds or Less		61-90 Seconds		> 90 Seconds	
		#	% of All Calls			#	%	#	%	#	%
Monday, 1/26/09	710	56	6	1:24	7:04	336	47	89	13	285	40
Tuesday, 1/27/09	601	9	1	0:23	4:39	525	87	38	6	38	6
Wednesday, 1/28/09	564	5	1	0:20	4:29	507	90	24	4	33	6
Thursday, 1/29/09	566	31	5	1:05	7:40	404	71	34	6	128	23
Friday, 1/30/09	629	29	4	1:18	8:14	409	65	31	5	189	30

As Table 7.2 shows, the percentage of calls received each day in the reservations office that was abandoned by the caller after 90 seconds ranged from one percent to six percent. MARTA's performance standard of an abandoned call rate of 3.5 percent or less was met on Tuesday and Wednesday. On the other three days of this sample week, the abandoned call rate fell into the "needs improvement" category of MARTA's standard of 3.6 to 7 percent of calls abandoned.

Daily average telephone hold times for the week ranged from 20 seconds to one minute and 24 seconds. Daily maximum hold times ranged from four minutes and 29 seconds to eight minutes and 14 seconds. Average and maximum hold times were lower on Tuesday and Wednesday than on the other days of the week; hold times were longest on Friday.

Between 47 percent and 90 percent of the answered calls each day were on hold for 60 seconds or less. Performance was best on Tuesday and Wednesday of this sample week, with 87 percent to 90 percent of calls on hold for 60 seconds or less. Performance was worst on Monday, when fewer than half of the answered calls were on hold for 60 seconds or less. Relatively few of the calls received each day fell into the "needs improvement" category: the percentage of calls each day that were on hold from 61-90 seconds ranged from four percent on Wednesday to thirteen percent on Monday. Between six percent and 40 percent of the calls answered each day were on hold for more than 90 seconds and failed to meet the MARTA standard. Performance was best on Tuesday and Wednesday and worst on Friday.

Table 7.3 shows the number and percentage of calls each day during the sample week that were on hold for less than three minutes, between three and five minutes, and longer than five minutes.

**Table 7.3 – Mobility Reservations Office Telephone Hold Times,
Week of January 26-30, 2009**

Day and Date	Calls Answered	< 3 Minutes		3-5 Minutes		> 5 Minutes	
		#	%	#	%	#	%
Monday, 1/26/09	710	608	85.6	85	12.0	17	2.4
Tuesday, 1/27/09	601	589	98.0	12	2.0	0	0
Wednesday, 1/28/09	564	559	99.1	5	0.9	0	0
Thursday, 1/29/09	566	486	85.8	43	7.6	37	6.5
Friday, 1/30/09	629	510	81.1	62	9.9	57	9.0

Each day, between 81 percent and 99 percent of calls answered were on hold for less than three minutes. Calls that were on hold for three to five minutes made up less than one percent to 12 percent of answered calls each day. Between two percent and nine percent of calls each day were on hold times for more than five minutes. The percentage of calls with longer hold times were lower on Tuesday and Wednesday than on other days, and highest on Friday.

Average and maximum hold times for calls to the reservations office by hour for each day during the week of January 26-30, 2009, are shown in Table 7.4. Data in the bottom section of the table indicates the number of hours in each day during which average hold times met or exceeded MARTA's formal hold time standard for calls to the reservations office. All information in Table 7.4 was obtained from Symposium Call Center ACD reports for the sample week.

As the table shows, average hold times were below 60 seconds, MARTA's hold-time standard, in the majority of hours during which the reservations office was staffed on Tuesday through Thursday of the sample week. On Monday of that week, the standard was met for only 2.5 hours.

Information about maximum hold times by hour for each day in the sample week is presented on the right side of Table 7.4. Maximum hold times ranged from a low of 14 seconds to a high of eight minutes and 14 seconds. In general, maximum hold times tended to be greater on Monday and Friday than on the other days of the week and greater in the middle and near the end of each day than at the beginning.

Table 7.4 – Telephone Performance for the Reservations Office, January 26-30, 2009

	Average Hold Time for Answered Calls (seconds)					Maximum Hold Time (seconds)				
Hour of day	1/26 /09	1/27/09	1/28/09	1/29/09	1/30/09	1/26/09	1/27/09	1/28/09	1/29/09	1/30/09
8:30 a.m. - 9:00 a.m.	18	7	8	6	17	88	17	55	14	107
9:00 - 10:00 a.m.	16	12	8	9	18	110	79	34	87	163
10:00 - 11:00 a.m.	60	5	6	29	7	244	13	17	249	21
11:00 a.m. - 12:00 p.m.	79	8	18	79	11	296	51	114	361	90
12:00 - 1:00 p.m.	73	14	9	170	23	423	199	121	460	170
1:00 - 2:00 p.m.	114	28	28	25	75	254	142	141	176	327
2:00 - 3:00 p.m.	121	18	20	33	97	333	131	98	146	282
3:00 - 4:00 p.m.	66	49	17	23	40	215	279	134	150	216
4:00 - 5:00 p.m.	165	38	40	175	290	424	221	269	451	494
Total calls answered	710	601	564	566	629	710	601	564	566	629
Hours with avg hold times of 60 seconds or less	2.5	8.5	8.5	5.5	5.5					
Hours with avg hold times of 61-90 seconds	3	0	0	1	1					
Hours with avg hold times of > 90 seconds	3	0	0	2	2					
Hours with avg hold times under 3 minutes	8.5	8.5	8.5	8.5	8					
Hours with avg hold times of 3-5 minutes	0	0	0	0	1					
Hours with avg hold times of > 5 minutes	0	0	0	0	0					

Maximum average 4 minutes, 50 seconds - 4:00 - 5:00 Friday, 1/30

Weekend Reservations Call-Backs

At the time of the review, the Mobility reservations office was not fully staffed on weekends or holidays. On weekends, riders requesting next-day trips were asked to leave a voice mail message with the trip information. A reservation agent was to call the customer back to book the ride. The *Guide* indicated that a return call would be made within the hour.

At the time of the site visit, MARTA staff stated that the reservation agents on duty on weekends and holidays kept a log of call-backs that included the time of the voice message, the caller's phone number, the time of the call back, and the action taken (i.e., if the trip was booked, if information about a current trip was provided, if trip was cancelled, or if a message was left for the customer). A review of the call-back log for Saturday, February 7, 2009, with one reservation agent on duty, indicated that customers' calls received between 10 a.m. and noon were returned either in less than one hour or between an hour and approximately one hour and 20 minutes. Calls that were received between noon and 4 p.m. were generally returned more than an hour later and up to two hours and 20 minutes later. A total of 158 call-backs were recorded in the log for that day.

Two hundred sixteen call-backs were attempted on Sunday, February 8, 2009, according to the call-back log. One reservation agent was on duty between 10 a.m. and 5:30 p.m.; an additional reservation agent appeared to be on duty between 1 p.m. and 5:30 p.m. For calls that were received between 10:00 and 10:15 a.m., call-backs were made in less than an hour or up to an hour and 15 minutes later. Customers who called between 10:15 and 11 a.m. generally received a call-back more than an hour later, and up to one hour, 45 minutes after leaving a message. Between 11 a.m. and 2 p.m., call volumes were highest and call-backs were made, in general, in more than an hour, and up to 2-1/2 hours after customers left messages. Between 2 p.m. and 4 p.m., calls were returned in one hour or up to 1-1/2 hours later.

The review of the call-back logs for February 7 and 8 also indicated that riders could often not be contacted. A total of 376 call-backs were attempted on these two days. In 58 instances, MARTA reservationists left a message on an answering machine and never reached the rider. In another seven instances, the calls did not go through for other reasons such as a wrong number, busy signals, etc. These 65 instances represent over 17 percent of the call-backs.

Findings and recommendations regarding weekend call-backs are included in Chapter 8 of this report.

Mobility ETA Group

"Where's my ride?" calls were handled by the Mobility ETA staff. The review team analyzed data generated by the Symposium Call Center ACD system to assess the performance of the ETA call group during the month of January 2009.

During the month, the ETA Group received 16,650 calls of which 14,043 were answered. The average hold time was 33 seconds; the maximum hold time was 34 minutes and 16 seconds.

A comparison of hold times from “Mobility Reservations Weekly Status Report” which documented MARTA’s phone system performance standard and the quarterly ADA performance reports prepared by DEO showed the following:

- Less than three minutes: 13,494 calls, or 96 percent of answered calls
- Three to five minutes: 413 calls, or three percent of answered calls
- More than five minutes: 136 calls, or one percent of answered calls

Information about hold times for calls to the ETA group by hour for each day during the week of January 26-30, 2009, is shown in Table 7.5. The average and maximum hold times for each hour that calls to the ETA line were answered according to Symposium Call Center ACD reports are presented in the top section of the table. The bottom section of the table shows the number of hours each day that met or exceeded MARTA’s official standard for average hold times. The comparison of each hour’s average hold time to MARTA’s standard is shown even though the standards had been established for calls to the reservations office and not for calls to the ETA line.

Calls to the ETA line were answered nearly 24 hours a day during the sample week. Average hold times during nearly all of those hours were 60 seconds or less, and met MARTA’s standard for hold times for calls to the reservations office. During most of the few hours in which average hold times were greater than 60 seconds, they were between 61 and 90 seconds. In three hourly periods on Tuesday, January 27 and Wednesday, January 28, average hold times exceeded 90 seconds.

As shown in Table 7.5, maximum hold times for calls to the ETA line during the sample week ranged from two seconds to 34 minutes and 16 seconds. The highest maximum hold time occurred between 9 p.m. and 10 p.m. on Wednesday, January 28, and was significantly higher than the maximum hold times that were experienced by callers during other hourly periods. Although there were variations, maximum hold times during this sample week were highest between the hours of 7 a.m. and 5 p.m. on Monday and Tuesday, and between the hours of 3 p.m. and 6 p.m. or 7 p.m. on Wednesday and Thursday, and at various two-hour periods throughout the day on Friday.

Review Team Observations

Review team members observed operations in the reservations office for several hours during the afternoon of February 9, 2009 and the morning of February 10, 2009. During those times, calls were answered promptly by the reservations agents, even on Monday afternoon when the volume of calls was high. Reservation agents also recorded and verified trip information. Review team members also observed operations in the ETA area for several hours in the afternoon on February 10, 2009. Agents answered calls in a professional and timely manner.

However, several of the reservation agents experienced delays in processing calls when their computer systems “froze”. Reservations office staff indicated that similar problems had been occurring since the end of November 2008, including during the sample week of January 26-30, 2009 that was selected for analysis of telephone system performance. Longer call-processing times might limit the availability of reservation agents to answer new calls and contribute to longer hold times for other customers.

Table 7.5 – Telephone Performance for the ETA Call Group, January 26-30, 2009

ETA Call Group (Dispatch)	Average Hold Time for Answered Calls (Seconds)					Maximum Hold Time (seconds)				
	1/26/09	1/27/09	1/28/09	1/29/09	1/30/09	1/26/09	1/27/09	1/28/09	1/29/09	1/30/09
3:00 a.m.										
4:00 a.m.										
12:00 - 1:00 a.m.	0	2	4	4	0	0	2	4	4	0
1:00 - 2:00 a.m.	0	8	0	0	0	0	8	0	0	0
2:00 - 3:00 a.m.	4	10	0	3	14	4	10	0	3	25
3:00 - 4:00 a.m.	4	0	34	0	8	4	0	34	0	10
4:00 - 5:00 a.m.	18	11	12	35	23	18	121	29	155	208
5:00 - 6:00 a.m.	23	6	8	23	7	176	44	63	94	36
6:00 - 7:00 a.m.	11	13	8	14	12	37	175	24	95	83
7:00 - 8:00 a.m.	14	27	7	22	6	108	168	45	83	21
8:00 - 9:00 a.m.	51	182	12	37	6	199	484	66	159	45
9:00 - 10:00 a.m.	30	192	30	12	10	151	383	54	54	70
10:00 - 11:00 a.m.	61	16	11	14	19	200	110	82	146	137
11:00 a.m. - 12:00 p.m.	21	28	13	10	14	193	183	101	64	180
12:00 - 1:00 p.m.	57	36	21	14	8	198	205	86	206	57
1:00 - 2:00 p.m.	18	45	9	27	7	150	210	48	276	35
2:00 - 3:00 p.m.	8	54	7	15	9	22	259	32	115	36
3:00 - 4:00 p.m.	14	63	22	40	68	109	213	166	193	280
4:00 - 5:00 p.m.	7	50	64	41	87	29	220	288	198	303
5:00 - 6:00 p.m.	13	14	17	40	51	125	103	165	314	90
6:00 - 7:00 p.m.	6	20	28	31	9	11	72	143	212	36
7:00 - 8:00 p.m.	10	8	7	11	7	51	15	17	37	19
8:00 - 9:00 p.m.	8	0	31	18	5	19	0	31	46	7
9:00 - 10:00 p.m.	9	39	418	31	66	32	91	2056	182	241
10:00 - 11:00 p.m.	8	12	29	85	15	19	7	86	158	70
11:00 p.m. - 12:00 a.m.	1	43	5	29	6	3	286	6	120	14
12:30 a.m.										
Total calls answered	619	634	532	630	584					

ETA Call Group (Dispatch)	Average Hold Time for Answered Calls (Seconds)					Maximum Hold Time (seconds)				
	1/26/09	1/27/09	1/28/09	1/29/09	1/30/09	1/26/09	1/27/09	1/28/09	1/29/09	1/30/09
Hour of day										
Hours with avg hold times of 60 seconds or less	23	21	22	23	21					
Hours with avg hold times of 61-90 seconds	1	1	1	1	3					
Hours with avg hold times of > 90 seconds	0	2	1	0	0					
Hours with avg hold times under 3 minutes	24	22	23	24	24					
Hours with avg hold times of 3-5 minutes	0	2	0	0	0					
Hours with avg hold times of > 5 minutes	0	0	1	0	0					

7.5 Findings

1. To meet the requirements of §37.131(f) to operate Mobility service without any operational pattern or practice that significantly limits the availability of service, a revised telephone standard that specifies a maximum hold time for reservations and “ETA”- line calls is needed. Telephone hold times must be tracked and monitored against the standard and staffing adjusted to avoid a pattern or practice of significantly long hold times. MARTA must track all hold times, including those longer than five minutes. Based on telephone performance for the month of January 2009 for the reservations office, sixty-two percent of calls met MARTA’s hold time standard. At the time of the review, the “metrics” for telephone performance in reservations prevented MARTA from measuring actual maximum hold times. The “metrics” lacked a target percentage of calls that MARTA expected to be handled and a percentage of the time the standards were to be achieved. The “metrics” did not specify if the target average hold time of 60 seconds and the target maximum of 90 seconds applied to each hour of the day, each total day of service, or an average for the month. MARTA’s target for reservation telephone performance of a 60 second average hold time was met during only 2.5 hours on Monday of the sample week and nine percent of reservation calls answered on Friday of the sample week were on hold for more than five minutes. MARTA’s performance standard of an abandoned call rate of 3.5 percent or less was met on two days of the sample week. Use of averages as a performance standard can mask individual call times and periods of poor performance during the month; it is possible to meet a monthly average standard while still experiencing significantly longer hold times at specific times of day and/or on specific days of the week. As part of MARTA’s response to this finding, draft the revised standard and submit a copy to FTA.

Additional findings requiring corrective action are similar to those discussed in Chapter 8, Trip Reservations. See Chapter 8 for findings regarding access to reservations. See below for recommendations concerning telephone performance

7.6 Recommendations

1. Base the hold time standard on maximum hold time rather than average hold time. The concern with using average hold times is that this standard could be met while masking periods of poor performance and actual individual call times during the month. If an average hold time standard is used, call for a specific percentage of hourly call periods to have shorter hold times than the average.
2. Consider adopting performance standards that measure the percentage of Mobility calls on hold by time increment, for example: W percent of calls answered within one minute, X percent in two minutes, Y percent in three minutes with 100 percent of the calls answered within Z minutes. Set the maximum allowable hold time to avoid

significantly long hold times. When measuring hold times, use 30-minute increments.

3. Attempt to identify the source of computer freezing problems. Resolving the issue will decrease the number of long and reduce average hold times.
4. Consider simplifying the numbers and menu options through which customers may access the Mobility reservations office and ETA line. If the reservations office could be reached through the central MARTA number only, the direct Mobility reservations office number only, or the central number and the direct reservations office number, placing trip requests or checking on the status of a ride would be more convenient for customers and there would be less potential for delays for the customer while calls are transferred to the reservations office from other lines.

8 Trip Reservations Process

While the previous chapter addressed telephone performance and its impact on access to reservations, this chapter focuses on how MARTA handled trip requests.

8.1 Response Time

The response time provisions of § 37.131(b) of the DOT ADA regulations require the transit system to schedule and provide paratransit service to any ADA complementary paratransit eligible person at any requested time on a particular day in response to a request for service made the previous day. Reservations may be taken by reservation agents or by mechanical means and the transit system can use real-time scheduling in providing ADA complementary service. Section 37.131(b)(2) states the transit agency may negotiate pickup times with the rider but cannot require the rider to schedule a trip to begin more than one hour before or after the individual's desired departure time.

Section 37.131(b)(4) of the DOT ADA regulations also permit transit operators to accept paratransit reservations to be made up to 14 days in advance. It is important to note, however, that providing advance reservations is *optional*; providing next day service is *required*.

The review team examined how MARTA handled trip requests from riders. Particular attention was given to policies regarding trip reservations and whether MARTA uses any form of trip caps or waiting lists. In addition, the review considered whether there was a pattern or practice of denying a significant number of ADA-eligible trip requests. Finally, this portion of the review examined the policies and procedures concerning the negotiation of requested trip times. The review team gathered and analyzed the following information:

- Comments from customers and advocates through telephone interviews and through a review of comments and complaints on file at FTA and MARTA
- Reservations policies and performance standards
- Service reports prepared by MARTA 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 contractor staff about the ability to accommodate trip requests

8.2 Customer Comments

None of the ten riders and agency staff contacted in advance of the on-site review indicated issues with trip denials, waiting lists, or trip caps. Most of the riders also indicated that they are able to negotiate pickup times that work for the trips they are making.

Three individuals indicated that when they called to book trips based on their appointment times, the pickup times offered were early. One person indicated that pickup times are often 60 to 90 minutes prior to the stated appointment time. One person cited a 7:45 a.m. pickup offer for a 10 a.m. appointment.

One person indicated that the trip reservation process seemed cumbersome and could be frustrating. She stated that she had used the service mainly as a subscription rider in the past. She

began using the service for non-subscription trips and found the process of negotiating pickup times somewhat frustrating.

The trip scheduling process and offering pickup times acceptable to customers were mentioned twice in complaints received by MARTA in December 2008. This represented 1.2 percent of all comments received.

Neither of the two formal complaints on file at FTA indicated issues with trip denials, waiting lists, trip caps or the trip scheduling process.

8.3 Policies and Procedures

As noted in Chapter 3, the January 20, 2009 letter received in advance of the on-site review indicated that it was MARTA's policy to not deny any trip requests. MARTA staff also indicated that they did not set trip caps of any kind and did not use waiting lists as part of the trip reservations or scheduling process for non-subscription trips.

MARTA indicated that it defined trip denials as not only an outright inability to serve trip requests, but also "pickups made more than 120 minutes after the scheduled time." During the on-site visit, it was explained that this definition was related to an operational practice implemented for very-late pickups. If pickups were projected to be more than 120 minutes late on the day of service, riders were called to inform them of the delay. Riders were then asked if they still wanted the service to be provided. If riders declined the late service, these were then recorded in the system as denials. MARTA staff stated their goal was not have any denials under either definition.

While the formal definition provided by MARTA indicated that this second type of trip "denial" was related to vehicles that were 120 minutes late, it was noted during the on-site review that this standard had been tightened in actual practice. The observed practice was that riders were called when pickups were expected to be more than 60 minutes late. Should riders then cancel these trips, the declinations of these late pickups were also recorded as a denial.

MARTA staff also indicated that they comply with the DOT regulatory requirement to schedule trips within one hour of the time requested. A review of the parameters set in the Trapeze system—the automated system used for trip bookings and initial scheduling—showed that MARTA had set the system to generate pickup times that were within 60 minutes of the requested time.

As noted in Chapters 5 and 7, MARTA accepted trip requests weekdays from 8:30 a.m. to 5 p.m. On weekdays, requests could be made for trips from one to seven days in advance. On Saturdays, Sundays, and holidays, riders must call and leave a voice mail message to make trip reservations between 10 a.m. and 4 p.m. and trip requests were limited to the next day only. Riders were asked to leave a message with basic details of the trip they would like to schedule. Reservation agents then checked the voice mail and called riders back to complete the trip booking.

Subscription service was available for trips that were to and from the same origins and destinations, at the same pickup or drop-off times, and were made at least two times per week.

As noted on pages 15-17 of the *Guide*, subscription service was limited to work, educational, and medical trips. Short-term suspensions to subscription trips (e.g., for riders on vacation) could be made without losing subscription service. Requests must be made ten business days in advance of the needed suspension of service. Long-term changes must be submitted as new subscription service requests. MARTA reserves the right to withdraw subscription service if riders cancel more than eight scheduled trips in a thirty-day period. If subscription service is withdrawn, riders can still request the trips on a non-subscription, “demand” basis.

When riders called to book a trip, reservationists typically followed this process to book the first leg of the trip:

- Entered the rider name into the Trapeze trip booking screen, which called up the rider’s information from the client file
- Confirmed the origin address—usually by asking callers if they would be traveling from their home address (which automatically populated the origin address field).
- Entered a different address if the origin was not the home address
- Confirmed the home telephone number and/or cell phone numbers listed for the rider
- Entered the date of the trip and confirmed the day and date
- Entered the destination address by selecting a destination from a common locations file, or geo-coded a destination address if it is was not already in the system
- Requested and entered any special pickup or drop-off location instructions
- Requested and entered a destination telephone number (if available)
- Asked for an appointment or desired arrival time and entered this time (if applicable) in the latest time (“LT”) field of the “Destination” portion of the trip-booking screen. A time 15 minutes before the stated appointment time was also entered into the “requested time (“RT”) field in the “Destination” portion of the trip-booking screen. If riders indicated there was no appointment or desired arrival time, a requested pickup time was entered in the “RT” field in the “Origin” portion of the trip-booking screen.
- Asked something like, “Will you be going by yourself?” to determine if a PCA or companions would accompany the rider
- Verified the mobility aids that the rider would use during the trip

Reservationists said that stated appointment times were entered into the “LT” field and a time 15 minutes before the stated appointment time was entered into the “RT” field so that riders were sure to get to appointments on time. The extra 15 minutes between the “RT” and “LT” time allowed for some time to disembark from the vehicle and travel to the destination.

Once all of this information had been entered into the system, reservationists clicked on the system icon that initiated scheduling the trip onto a vehicle run. If the system indicated that scheduling options were available, reservationists reviewed the suggested pickup times for the trip requested. As a general rule, reservationists would typically not offer a suggested pickup time if it was less than 90 minutes before the stated appointment time. It was explained that this allows for the vehicle to arrive up to 30 minutes after the scheduled pickup time (any time within the pickup window), as well as for 60 minutes of possible travel time. For shorter trips, it was observed that reservationists sometimes selected pickups that were 75 minutes before the stated appointment time.

Occasionally, when reservationists initiated scheduling of the trip onto a run, the Trapeze system indicated that no scheduling options were available. In these cases, reservationists left the trip in the system as an “UNS” (unscheduled) request to be manually scheduled later by schedulers or dispatchers. When this was done, the reservationists confirmed the trip with the caller as if it had been scheduled at the time requested. The review team observed that the 16 trips that were left unscheduled were later reviewed manually and scheduled by the schedulers. It did not appear that these unscheduled requests amounted to a prohibited wait list.

To book the return or subsequent legs of trips, reservationists typically:

- Initiated scheduling of a return trip in the system, which automatically populated the new origin address with the prior destination address and the new destination address with the prior origin address.
- Asked if the rider would be returning to the origin address. If not, the reservationist changed the address in the return trip booking screen.
- Asked when the rider would like to be picked up for the return trip and entered this time into the “RT” (requested time) field in the origin portion of the trip booking screen.

Again, once this information was entered, reservationists initiated a search for scheduling options. If the system indicated that options were available, the options were reviewed and a time was selected and offered to the rider.

For return trips, reservationists did not select or offer times that were earlier than the requested pickup time so that riders would not have to leave earlier than desired (e.g., leave work early).

Once all trip legs were booked, reservationists went to the final trip summary screen and repeated and revived key information for each trip, including the day/date, the origin and destination addresses, and the “be ready” and scheduled pickup times.

A review of the Trapeze parameter setting indicated that a “Global” travel time setting of 90 minutes was used. This allowed the system to schedule ride times that were up to 90 minutes long without indicating a travel time violation. At the time of the review, MARTA reservationists typically selected pickup times that were 75 to 90 minutes prior to appointment times but that included both the 30-minute pickup window and 45 to 60 minutes of travel time. Having a “Global” travel time setting that allowed 90-minute ride times, while considering only 45 to 60 minutes of travel time in the trip booking process, could lead to trips with late drop-offs. As discussed in Chapter 9, more detailed travel time settings are needed to ensure that trips are not booked in a way that will result in late drop-offs.

Subscription Service

Subscription service was available for those trips to and from the same origins and destinations, at the same pickup or drop-off times, on the same days each week and were made at least two times per week, from month-to-month. As stated on pages 15-17 of the *Guide*, subscription service was limited to work, educational, and medical trips. Short-term suspensions to subscription trips, for example for riders on vacation could be made without losing subscription service. Requests were to be made ten business days in advance. Long-term changes were

required for consideration as new subscription service requests. MARTA reserved the right to withdraw subscription service if riders cancelled more than eight scheduled trips in a thirty-day period. If subscription service was withdrawn, riders could still request the trips on a non-subscription, “demand” basis.

8.4 Review of Recorded Trip Denials

Under Section 37.131(b) of the DOT ADA regulations, the transit system may negotiate pickup times with a passenger, but cannot require the passenger to schedule a trip to begin more than one hour before or after his or her desired departure time. If the trip cannot be arranged within this timeframe and the passenger accepts a departure time of more than one hour earlier or later, this still constitutes a denial of service and must be counted as a denial, whether the rider accepts the offer or not due to the entity’s inability to meet the ADA service criteria. Similarly, if only one leg of a round trip can be reserved, and the rider declines the trip, it must be tracked as two denials.

Information about the number of trips provided and the number recorded as “denied” was obtained from MARTA for FY 2007, 2008, and 2009 (to date). A copy of the data is in Attachment E.

MARTA provided 308,602 one-way trips to ADA paratransit eligible riders in FY 2007 (July 1, 2006 through June 30, 2007). A total of 1,616 trips were recorded as “denials” in this year—0.52 percent. In FY 2008, 347,379 trips were provided and 593 were recorded as “denials” (0.17 percent). And in the first six months of FY 2009—July through December 2008—198,416 trips were provided while 131 were recorded as “denials” (0.06 percent).

These denials were discussed with MARTA paratransit managers. The review team noticed that all of these trips were actually scheduled in the trip reservations process, but were trips that were later cancelled by riders when pickups ran very late (more than an hour late) on the day of service. It was discussed that these trips should have been counted as trips missed by MARTA rather than as trip denials.

8.5 Observations of the Handling of Trip Requests

On Monday afternoon (February 9) and Tuesday morning (February 10), review team members observed reservationists handling and scheduling of trip requests for approximately five hours, through both the afternoon and morning peak call times. Reviewers observed and recorded 288 trip requests.

Table 8.1 shows the number of: observed trip requests received from one to seven days in advance, trips placed directly on runs by reservationists trips left unscheduled in the system and trips denied or wait listed is shown.

Table 8.1 – Outcomes of Trip Requests Observed on February 9 and 10, 2009

Number of Days in Advance	Trips Scheduled to Runs	Trips Left Unscheduled	Trips Denied or Wait Listed	Total Trip Requests
1 day	132	13	0	145
2 days	44	0	0	44
3 days	35	0	0	35
4 days	15	2	0	17
5 days	10	1	0	11
6 days	10	0	0	10
7 days	8	0	0	8
TOTAL	272	16	0	288

As shown, reservationists scheduled 272 of the 288 to runs. Only 16 of the 288 trip requests were left as unscheduled. At the time of the review, trips left unscheduled were later reviewed manually and scheduled to runs by schedulers. Callers were not told the trip was being left unscheduled. The review team observed neither trip denials nor trip requests being placed on a waiting list.

The review team noticed that 145 of the 288 trip requests (50 percent) were requested one day in advance. Another 79 trips (27 percent) were requested two or three days in advance. The fact that 77 percent of all requests observed were made three or fewer days in advance suggests that these riders may not be concerned about their trips being denied trips or being offered inappropriate pickup times offers if they were to request trips closer to the day they wished to travel.

Reservationists were professional and in gathering information from and providing information to callers. During trip request calls, they consistently confirmed:

- The days and dates of the trips
- Origin addresses and special pickup instructions
- Destination addresses
- Rider telephone numbers
- Appointment and pickup times
- Fares
- Types of mobility aids used by riders

Reservationists communicated exact pickup times to riders and did not consistently remind riders of the 30-minute pickup window. Not reminding riders of the 30-minute pickup window can sometimes result in riders expecting vehicles at an exact time and thinking that vehicles are late if they do not arrive at the scheduled pickup time. MARTA staff did indicate that many riders tend to call to check on a “late ride” within the 30-minute pickup window rather than waiting until the end of the window.

The review team noticed that reservationists did not ask if riders needed assistance beyond the curb at one or both ends of their trips. Given that MARTA’s policy was to only provide assistance beyond the curb on an as needed basis, it is important to request and record the need for this assistance in the trip reservation process, even if it is part of the eligibility process. The eligibility process is the place to identify the initial need for assistance beyond the curb. The eligibility process will not identify all needed assistance for every situation that will arise

throughout a rider's term of eligibility. A rider's need for assistance may vary from location to location.

It was also observed that the Trapeze system would sometimes generate inappropriate pickup times. For example, in several instances, the system generated early morning pickups at 6 or 7 a.m. for trips that were requested in the early or late afternoon. When this happened, reservationists would go back into the trip-booking screen and enter times in the "RT" field in the "Origin" portion of the screen to get the system to generate more appropriate times. For example, if the trip was being booked with an appointment time, the reservationists would enter a time 90 minutes before the appointment time in the "RT—Origin" field. This was done to try to get the system to generate a pickup time 90 minutes before the stated appointment time. This sometimes resulted in trip offers that were up to 150 minutes early. Reservationists seemed familiar with this issue; and would keep adjusting times in the system until they obtained a pickup time that was close to 90 minutes before the stated appointment time.

This issue was discussed with IT staff at MARTA. At first, it was thought that reservationists' workstations were not set with the "Sch W" (schedule window) option automatically toggled on. This option in the Trapeze system is designed to ensure that pickup times more than 60 minutes from the requested time (i.e., outside the one hour negotiation window) are not generated. In a few instances, the review team noticed that reservationist workstations did not consistently have this option toggled on. However, even after toggling the "Sch W" option on, the trip offers that were too early were generated on occasion. It was suggested that MARTA continue to investigate this problem, as a solution to the issue could not be found during the on-site review.

During one trip booking, the Trapeze system indicated that the trip was outside the 3/4-quarter-mile corridors that defined the MARTA ADA paratransit service area. The reservationist requested supervisor assistance and it was discovered that the origin and destination were actually within the service area. The supervisor explained that when changes were made to fixed routes, it sometimes took several months for corresponding changes to be made to the corridor polygons in the Trapeze system, and reservationists were trained to ask for assistance when Trapeze initially identified a trip as being outside the service area.

8.6 Findings

1. At the time of the review, it did not appear that MARTA provided an opportunity for passengers calling the reservations office on Saturday, Sundays and holidays to negotiate pickup times. Public information indicated that trip requests for next day service only could be left on voice mail between the hours of 10 a.m. and 4 p.m. on Saturdays, Sundays, and holidays and that call-backs to customers leaving a message during those hours would occur within one hour. The call back log for Sunday, February 8, 2009 indicated that only riders calling between 10:00 -10:15 received a call-back within an hour. Based upon the description of the log book provided to FTA, it is unclear whether pickup times were changed after the callbacks and it is unclear how MARTA handled trip requests when the rider could not be reached. Section 37.131(b)(2) of the DOT ADA regulations, permits transit systems to negotiate pickup times with ADA paratransit passengers but prohibits requiring the individual to schedule a trip more than an hour before or an hour after his scheduled time. The call-

back log for Saturday, February 7, 2009, indicated that calls received between 10 a.m. - noon were returned either in less than one hour or between an hour and approximately one hour and 20 minutes. Calls received between noon-4 p.m. were generally returned more than an hour later and up to two hours and 20 minutes later. A total of 158 call-backs were recorded in the log for that day. In an additional 65 instances (over 17 percent of the call-backs), the log indicated that a message was left for the rider or the caller could not be reached. MARTA must revise its process to ensure that passengers are able to negotiate pickup times prior to finalizing the schedule.

2. At the time of the review, riders could make reservations for Mobility trips on weekdays from 8:30 a.m. to 5:00 p.m. However, on Saturdays, Sundays, and holidays, riders had to leave a voice mail message to make a trip reservation only between 10 a.m. and 4 p.m. and wait for a call-back. The weekend and holiday hours for making reservations do not meet the requirements under §37.131(b)(1) of the DOT ADA regulations which requires the provision of reservations service during at least all normal business hours of the entity's administrative offices, as well as during times, comparable to normal business hours, on a day when the entity's offices are not open before a service day. Appendix D to the DOT ADA regulations explains:

Under this provision, an entity must make its reservation service available during the hours its administrative offices are open. If those offices are open 9 to 5, those are the hours during which the reservations service must be open, even if the entity's transit service operated 6 a.m. to midnight. On days prior to a service day on which the administrative offices are not open at all (e.g., a Sunday prior to a Monday service day), the reservation service would also be open 9 to 5.

3. At the time of the review, MARTA recorded as trip denials any outright inability to serve trip requests and any pickups made more than 120 minutes after the scheduled time. This incomplete definition of denials may have resulted in an undercount of denied trips. To meet the requirements of §37.131(b) MARTA must revise its policy on tracking denials to include any outright inability to serve trip requests and any trips which it cannot schedule within one hour before or after the eligible riders desired departure time. Even if a rider accepts an offer of a trip that is outside the one hour window, the trip must be tracked as a denial due to MARTA's inability to meet the response time requirement. If only one leg of a round trip can be reserved, and the rider declines the trip, it must be tracked as two denials. These are the ADA trips which must be served and MARTA must track and report this information to FTA.

8.7 Recommendations

1. Reinforce with reservationists the importance of confirming and explaining the 30-minute pickup window during the trip-booking process. Failure to remind a rider of the window can result in a customer expecting the vehicle to arrive exactly at the negotiated pickup time and the impression that the pickup is late if it does not arrive at that exact time. MARTA staff confirmed that riders tended to call to check on a "late ride" within the 30-minute pickup window rather than waiting until the end of the window, when the vehicle was actually late.

2. Consider having Mobility reservationists on duty on weekends and holidays for accepting trip requests rather than relying on voice-mail and MARTA's call-backs.

9 Service Performance

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

In order to evaluate MARTA's performance in this regard, the review team conducted the following activities:

- Obtained comments from consumers regarding on-time performance and travel times through telephone interviews and a review of complaints filed with MARTA
- Reviewed MARTA's relevant service policies, procedures, and standards
- Observed MARTA's scheduling and dispatch functions and interviewed the appropriate staff
- Interviewed drivers about schedules provided and dispatch support received
- Reviewed MARTA'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 Customer Comments

Most of the issues raised by the ten riders and agency staff contacted in advance of the review had to do with service performance--particularly early arrivals to appointments. Several riders indicated that the pickup times were too early and, as a consequence, riders were arriving to appointments too early, more than 30-minutes early. Most people did not indicate that pickups were routinely late. Riders stated that if a vehicle was late outside of the window, it was usually really late. Two of the riders indicated that only five or six trips out of ten were on time, while a third indicated that MARTA Mobility was on time 95 percent of the time.

There were also numerous comments about excessively long ride times—up to 90 minutes. One rider reported a trip that took three hours. Other riders commented about vehicles driving past their destinations to pick up another rider and then doubling back to drop them off. Other riders indicated that drivers were sometimes given two pickups or drop offs at the same time and in different locations.

An agency travel trainer that he had heard of riders occasionally being given having different ready times than those the driver had on his manifest.

Several riders described being given incorrect information when calling to check on late rides, being told a vehicle was 5 minutes away but having to wait much longer for the vehicle to show up. Some described the converse; they were told the driver would be there in 30 minutes and then the driver arrived in five minutes. Some riders reported being instructed to “give the driver more time and call back in “X” minutes if he doesn’t arrive.”

Service performance was also the main subject of the two formal complaints on file at FTA. Both complaints claimed very late pickups and excessively long ride times. One complaint also mentioned “inconsiderate and apathetic dispatchers.”

An analysis of complaints on file at MARTA indicated that on-time performance, ride times, and no-shows made up the vast majority of rider comments. On-time performance complaints—50 regarding late pickups and 31 about late drop-offs—accounted for 48 percent of the 168 comments received in December 2008. Early pickups and drop-offs accounted for 3.6 percent of the month’s complaints. Complaints from 21 individuals who felt that they had been incorrectly charged with a no-show made up another 12.5 percent of complaints received in December 2008.

9.2 Service Standards and Policies

On-Time Performance Policies and Standards

At the time of the review MARTA had a target for on-time performance for Mobility pickups of 95 percent. It considered “on time” as within the pickup window (0/+30-minutes) or earlier. MARTA recorded pickup times for all trips and reviewed its performance on a monthly basis. It considered monthly performance of 90 to 95 percent as “needs improvement, while below 90 percent was considered as “fail.”

While MARTA tracked its on-time performance of Mobility drop-offs for appointments at the time of the review, it did not have a standard for drop-off performance.

Travel Time Policies and Standards

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

No-Show and Missed Trip Definitions and Performance Standards

Under §37.125(h) (1) of the DOT ADA regulations, transit operators may establish an administrative process to suspend ADA paratransit service, for a reasonable amount of time, to eligible individuals who

establish a pattern or practice” of missing scheduled trips. Trips missed by the individual beyond his or her control (including, but not limited to, trips which are missed due to operator error) shall not be a basis for determining that such a pattern or practice exists. Appendix D explains that “pattern or practice” involves, intentional, regular, or repeated actions, not isolated, accidental, or singular incidents. In particular, trips that are missed due to operator error are not attributable to the individual passenger for this purpose.

Similarly, §37.131(f) prohibits transit operators from engaging in operational patterns or practices that significantly limit the availability of ADA paratransit service to eligible persons, including substantial numbers of missed trips. As with passenger no-shows, operational problems outside the control of the transit operator do not count as a basis for determining that a pattern or practice under this provision. For example, if something that could not have been anticipated at the time the trip was scheduled (e.g., a snowstorm, an accident or incident that traps the paratransit vehicle, like all traffic on a certain highway, for hours), the resulting missed trip would not count as part of a pattern or practice. On the other hand, if scheduling practices fail to account for regularly-occurring traffic conditions or vehicles experience frequent mechanical breakdowns due to poor maintenance practices, a pattern or practice may exist.

The *Guide* (page 21) stated that Mobility will wait at least five minutes within the pickup window after reaching the pickup address. “If the customer does not board the vehicle within the five-minute grace period, the trip will be canceled and recorded as a ‘No-Show.’”

MARTA defined a “missed trip” as a Mobility vehicle arrival at the pickup point more than 30-minutes after the end of the window (0 to 30 minutes after the negotiated time). When a vehicle arrived from 1 to 30 minutes after the end of the window, MARTA classified these as “late.” MARTA had not set a standard for late or missed trips.

It is important to note that if a vehicle does not arrive within the pickup window, the rider has no obligation to wait for the vehicle. Any attempted pickup after the pickup window closes that does not result in a trip (either due to the rider turning down or canceling the trip or is not at the pickup location) should be coded as a “missed trip.”

As mentioned earlier in the report, MARTA’s response to FTA **did** not include a definition for missed trips or a goal on avoiding missed trips. At the time of the review, staff confirmed that a performance standard and goal on avoiding missed trips had not been established.

Discussions with MARTA staff during the on-site visit suggested that MARTA defined trips as “late” when a Mobility vehicle arrived as a Mobility vehicle arrival at the pickup point more than 30.” minutes after the end of the pickup window, in other words, more than 60 minutes after the scheduled pickup time. Staff stated that a formal standard and goal associated with missed trips had not been established.

Any attempted pickup after the end of the pickup window that does not result in a passenger being transported, either due to the rider turning down or cancelling the trip, or the rider no longer being at the pickup location must be coded as a “missed trip.” If a vehicle does not arrive within the pickup window, the rider has no obligation to wait for the vehicle.

Travel Time Policies and Standards

At the time of the review, MARTA's standard for on-board travel time for Mobility riders was the fixed route travel time for the same trip plus 30-minutes. The additional 30-minutes was intended to estimate the time associated with walking, stops, transfers, and waiting as part of a fixed route trip stops, transfers, and waiting as part of a fixed route trip.

9.3 Daily Operations

Scheduling Procedures

In practice at the time of the review, the first step in scheduling Mobility trips was the reservationists' taking trip requests from riders. In addition, roughly 40 percent of all trips were subscription trips (not equally spread out during the service day). At the time of the on-site visit, there were 1,800 to 2,000 trip requests on a typical weekday; 800 to 900 trip requests on Saturdays; and 500 to 600 trip requests on Sundays.

Mobility had two full-time schedulers plus a scheduling supervisor who worked on the vehicle schedules. Aside from the subscription trips, most assignments of trips to vehicle runs took place on the day before service. The schedulers focused their attention on the runs that had been built by the reservationists' assignment of trips and on moving and adding trips that Trapeze did not schedule. On some days, the schedulers "re-batch" the demand (non-subscription) trips.

Most subscription trips were anchored to particular runs. These assignments were reviewed and adjusted by the schedulers on a quarterly basis. The longer subscription trips were allowed to move from run to run on a daily basis, providing more flexibility to the runs.

The biggest challenge to the schedulers was the shortage of available runs. According to the scheduling supervisor, this was due to a lack of available drivers on most weekdays. On a typical weekday, the schedulers left 100 trips unscheduled. The overnight dispatchers were responsible for assigning all trips before 10:00 a.m. trips. Then the morning dispatchers tried to schedule trips beyond 10 a.m. Both were helped by openings in schedules created by same-day cancellations and no-shows.

Even with the capacity created by same-day cancellations and no-shows, however, the scheduling supervisor acknowledged that the insertion of these unscheduled trips onto the available vehicle runs led to scheduling violations, such as late pickups and drop-offs and/or long travel times). When an estimated pickup time fell out of the negotiated pickup window, Mobility's policy was to call riders and obtain their approval. The schedulers said that these calls did not always occur, particularly if the difference was a few minutes.

The scheduling supervisor also confirmed the review team observations concerning the scheduling of trips with requested drop-off or appointment times. The Trapeze software was set to schedule the pickup at least 90 minutes in advance of the appointment time, regardless of the distance or estimated travel time.

The scheduling supervisor also mentioned several procedures to improve efficiency of the schedules.

- He developed a “CBD zone,” an area in Atlanta where many trips have both their origins and destinations. He designated certain CBD runs that stay within this zone, which he believed had increased vehicle productivity.
- He tried to maximize “split shifts” (two pieces of work with at least a 1-1/2 hour gap) to better meet the weekday peak demand periods of morning and mid-afternoon. If the total duration of the work plus gap time exceeded 12 hours, drivers got paid for “premium time”.
- He wanted to develop runs that began or ended at rail stations during midday to save both deadhead time and miles.

Dispatch Procedures

At the time of the on-site visit, Mobility used four dispatchers plus a supervisor during peak periods; Mobility’s peak fleet was about 100 vehicles. This ratio appeared reasonable given the use of ETA clerks (described below) to handle calls from riders and certain communications with drivers. One of the dispatchers focused on road calls, late trips, and “Where’s My Ride?” inquiries (a further discussion on Mobility’s “Where’s My Ride” procedures follows). The other three dispatchers spent much of their time “performing” pickups and drop-offs. They did not interact much with the drivers on handling late trips or anticipating problems. Given the shortage of runs, they did not have options to move trips from one run to another.

During the overnight and morning shifts, dispatchers were also responsible for assigning unscheduled trips to runs.

Dispatchers stated that the Mobility fleet of 175 vehicles was not fully equipped with Mobile Data Terminals (MDTs) and that some of the MDTs were not reliable. At the time of the on-site visit, 140 of 175 vehicles had MDTs.

Use of Estimated Time of Arrival (ETA) Clerks

Since June 2008, MARTA had developed a new position within the Mobility office, ETA clerks; they worked within the Mobility facility in a separate office from the dispatchers’ office. The ETA clerks helped the dispatchers and talked to riders who called to make “last-minute” changes to their travel plans or who were waiting for a Mobility pickup. At the time of the on-site visit, there were three full-time ETA clerks who worked staggered shifts from morning until 8 p.m. MARTA planned to extend the end of the shift to 10 p.m. on weekdays.

When an ETA clerk received a call from a rider to find out the ETA for a late pickup, the ETA clerk could check this trip on the Trapeze dispatch screen (which was updated when either drivers or dispatchers “perform” trips), or the clerk could radio the driver directly. If a clerk had difficulty contacting the driver, she could ask a dispatcher to get the information. The ETA clerks also received calls from riders for the following situations:

- Rider was ready for pickup earlier than scheduled pickup (“ready early”). Clerk checked if driver is available to make early pickups and informed the rider.

- Rider would not be ready for scheduled pickup. Clerk cancelled the pickup and created a new “will-call” trip in Trapeze.
- Rider called to make a same-day cancellation.
- Rider confirmed time for pickup.

For trip cancellations, the clerks entered the cancellation into Trapeze and contacted the drivers directly. The clerks, however, did not direct drivers to change their schedules; this remained the responsibility of the dispatchers.

Review team members observed ETA clerks during a weekday afternoon (4 to 6 p.m.). They took calls from riders, talked to drivers and riders, and updated information in Trapeze, as described above. The ETA clerks served a useful function within the paratransit operation, as they relieved dispatchers of the responsibility to respond to rider calls and some of the more routine communications with drivers.

However, the clerks did not appear to understand the proper coding of certain trips. A review team member posed a hypothetical situation to a clerk: a rider calls at 8:45 a.m. to cancel a trip with a negotiated 8 a.m. pickup, 15 minutes after the end of the pickup window. The clerk said she would consider it a “same-day cancel,” rather than a late or missed trip.

A review team member observed an ETA clerk receiving a call at 4:51 p.m. from a rider canceling a trip that had a 4:15 p.m. negotiated pickup time. This was 36 minutes after the negotiated time, or 6 minutes after the end of the 30-minute pickup window. The clerk coded this trip as a “cancel” rather than recording it as a trip missed by MARTA. A further discussion and analysis of this practice is presented in Section 9.6.

9.4 Driver Interviews

The review team interviewed 10 vehicle drivers, who were randomly selected as they finished their runs. The interviews were conducted in private and drivers were informed that they would remain anonymous. Both new and experienced drivers were interviewed; the shortest tenure was one year and the longest tenure was eight years. Drivers were asked several questions about schedules and dispatch support, training, and understanding of service policies. Attachment F includes a copy of the form and questions used in the interviews.

When asked about the schedules they were given and whether the schedules were too loose, about right, or too tight, four of the 10 drivers said the schedules were too tight. One cited multiple pickups scheduled for the same times (e.g., three pickups at 9 a.m.). Five drivers said that the schedules varied and were sometimes too tight. One said that the schedules got too tight if there were not enough drivers to cover all of the runs created. Another said that his schedule was too tight “about once a week.” One driver said that he worked a split shift and his schedules were okay, but when he worked a morning straight shift the schedules were too tight.

When asked how often they ran late (meaning outside the on-time window), one driver said “one out of ten trips,” another said “two to three out of ten,” another indicated “four out of ten,” one

said “once a day,” and another said “pretty often.” Four drivers said “rarely” or “not often.” One driver indicated that he had a set run that did not vary and he rarely ran late for this reason.

When asked about the dispatch assistance on late trips, the review team received a very mixed response. Six drivers said that dispatch support and help with late trips varied and depended on the circumstances. One said trips were only moved if they were “really late.” Another said assistance was provided “a little more than half the time.” One said “it depended, but it had gotten better.” Four drivers were critical of dispatch support with three saying trips were rarely moved and dispatchers just said “do the best you can.” One of these four drivers said that he had stopped asking for dispatch support and for trips to be moved and just did his best with the schedule he was given.

Most drivers were familiar with the on-time pickup window, with eight correctly saying that it was from the scheduled pickup time to 30-minutes after the scheduled time. Two drivers, however, had an incorrect understanding of the pickup window. One driver said it was “the ETA,” and a second driver said his understanding was that it was “up to 10 minutes early” but not after the scheduled pickup time.

Most of the drivers interviewed felt that riders understood the 30-minute pickup window. Eight drivers said that riders understood the pickup window, or that “most” understood it. Only one driver indicated that riders did not seem to understand the pickup window. The question was not asked of the driver who indicated that pickups were to be made at “the ETA,” and who didn’t seem to understand the pickup window. Four of the eight drivers who said that riders understood the window also said that, while they riders understand the window, they still want the vehicle to arrive at the scheduled time and were often not pleased if the pickup was later inside the 30-minute window.

When asked if they needed to run early to stay on time, seven of the 10 drivers said “yes,” one said “sometimes” and one said “no.” The tenth driver, who indicated that it was his understanding that the pickup window started 10 minutes before the scheduled time, said he typically was early. All ten indicated that they would wait and not pressure riders if they were early. Two indicated that they contacted dispatchers and asked that a call be made to the riders. One said he went to the door to let the rider know he was there.

Six of the 10 drivers said that riders rarely or never indicated that the pickup times they were given differ from what was on the manifest. One said it sometimes happened and that the time differences were typically five to 10 minutes. Three drivers said time differences happened fairly often. One said time differences of 15-30 minutes were not uncommon and one said times could differ by up to 60 minutes.

All 10 drivers demonstrated a good understanding of the procedures to follow when riders were no-shows. All said they would wait a minimum of five minutes, would then contact dispatch, and would follow dispatch instructions from there. Most indicated that dispatchers would attempt to call riders before determining a no-show.

Drivers were also asked if information on the manifests about special pickup instructions or rider needs were accurate. Seven of the 10 said the instructions were typically provided and were accurate. Three said that special instructions were sometimes provided. One of these three said that riders sometimes indicated that they gave the reservations agent special instructions, but the instructions were not on the manifest. Five of the drivers were aware that special instructions were on both the paper manifests as well as on the MDTs and knew how to access the information on the MDTs. However, the other five indicated they were not sure if the information was also on the MDTs and did not seem familiar with accessing special pickup instructions on the MDTs.

In response to a question about the “most difficult part of the job,” four drivers indicated that the schedules—being too tight and sometimes not making sense—were the greatest challenge. Two drivers mentioned the lack of help from dispatchers, poor relationships with dispatchers, and inappropriate and difficult communications with dispatchers. Two drivers mentioned long hours and the need to do split shifts. One mentioned that traffic and other drivers was the most difficult thing. And one said that “satisfying customers” was the most difficult part of the job.

Finally, at the end of the interviews, vehicle drivers were asked for “other issues” and general comments. Comments included:

- “Schedules are the main thing”
- Dispatcher responsiveness
- Vehicle drivers and dispatchers “need to work as a team”
- Favoritism given to some drivers by dispatchers
- Vehicle maintenance
- Split shifts
- Pay disparity between fixed route and paratransit
- A need to “inform passengers about the service rules”

9.5 On-Time Performance

Reported On-Time Performance

At the time of the review, MARTA recorded pickup times for all trips and reviewed performance on a monthly basis, to monitor on-time performance for pickups. In FY 2008, reported on-time performance was 84.4 percent. On-time performance appears to have improved in FY 2009. Reported performance for the first 5 months (August to December 2008) ranged from 85.8 percent to 90.8 percent.

MARTA recorded actual drop-off times for all trips and tracked drop-off performance for all Mobility trips with requested appointment times. Reported drop-off performance by month (August to December 2008) ranged from 85.5 percent to 89.6 percent. Table 9.1 presents the performance levels for pickups and drop-offs reported by MARTA from August to December 2008.

Table 9.1 – Reported On-time Performance for Mobility Pickups and Drop-offs

Month (2008)	Pickups		Drop-offs	
	Total Trips	In Window or Early	Total Trips	On Time
August	33,274	88.1%	12,805	86.6%
September	34,398	85.8%	12,863	85.5%
October	37,000	87.5%	14,258	86.7%
November	31,121	90.8%	11,650	89.6%
December	33,245	88.0%	12,376	87.5%

For the pickups, when considering only pickups that are in the window, performance was considerably lower, as early pickups comprised 30 to 34 percent of all trips.

Calculated On-Time Performance for Sample Day

In order to develop an independent estimate of on-time performance, the review team evaluated a sample of Mobility trips completed on Wednesday, January 28, 2009. The review team analyzed a sample of 151 ADA complementary paratransit service delivered that day. The review team recorded the information directly from the driver manifests, sampling every tenth trip from the day's manifests. For each trip in the sample, the review team recorded the scheduled pickup time and appointment time (when available) printed on the manifest along with the actual pickup arrival time, pickup departure time, and drop-off time written on the manifests by the drivers.

Table 9.2 shows the analysis of on-time pickup performance for the sampled trips. Considering all pickups that were in the window or early, on-time performance was 87.4 percent. This is comparable to the on-time performance reported by MARTA for that day, 90.6 percent, but below MARTA's own target of 95 percent. If one counts only pickups within the window of 0/+30-minutes, then on-time performance for the sampled trips was 58.9 percent; 28.5 percent of the pickups took place before the beginning of the window.

Of the 151 trips, 72 had specified appointment times. The on-time drop-off performance for the sampled trips is presented in Table 9.3.

The analysis showed that 83.3 percent of the sampled trips with appointment times had on-time drop-offs; in other words, one of every six trips with an appointment time arrived late. While MARTA does not have its own standard at the time of the review, this was poor performance. In addition, 38.9 percent of trips with appointment times had very early drop-offs—arrivals more than 30-minutes early. As discussed in Chapter 8, review team members observed that reservationists usually allowed at least 90 minutes from pickup time to appointment time (e.g., 7:30 a.m. pickup for a 9 a.m. appointment), regardless of the distance to travel. For shorter trips, reservationists sometimes selected pickups that were 75 minutes before the stated appointment time.

Table 9.2 – On-time Pickup Performance: January 28, 2009

	Number	%
Sample	151	100.0
Pickups in Window (0-30-minutes after negotiated time)	89	58.9
Pickups in Window or Early	132	87.4
All Early Pickups	43	28.5
1-15 minutes	31	20.5
16-30-minutes	6	4.0
> 30-minutes	6	4.0
All Late Pickups	19	12.6
1-15 minutes	13	8.6
16-30-minutes	3	2.0
> 30-minutes	3	2.0

Table 9.3 – On-time Drop-off Performance: January 28, 2009

	Number	%
Sample	72	100.0
All on-time trips (before appointment time)	60	83.3
1-15 minutes	12	16.7
16-30-minutes	20	27.8
30-60 minutes	25	34.7
> 60 minutes	3	4.2
All Late Drop-offs	12	16.7
1-15 minutes	7	9.7
16-30-minutes	0	0
> 30-minutes	5	6.9

9.6 Review of Trip Coding

As discussed in Section 3 of this report, MARTA's response to FTA included neither a definition for missed trips nor a performance standard on avoiding missed trips. Discussions with MARTA staff during the on-site visit indicated that MARTA considered a trip to be "missed" if the vehicle arrived more than 30 minutes after the end of the pickup window, in other words, more than 60 minutes after the scheduled pickup time. Staff stated that a formal standard and goal associated with missed trips had not been established.

MARTA defined "late" pickups as a vehicle's arrival from 1 to 30 minutes after the end of the window.

During the sample week (January 25 to 31, 2009), MARTA Mobility recorded a total of 95 "missed trips".

The 95 missed trips yield a rate of missed trip rate of 1.23 percent:

$$(95 \text{ missed trips}) \div (7638 \text{ completed trips})$$

Review team members reviewed the trip records for this sample week that were coded as “passenger no-shows” to determine if they had been properly coded. Within Trapeze, the review team looked at the “tracker comments” that had been entered by Mobility staff that declared no-shows, the date and time—and compared them to the pickup window of each trip request. During the sample week, there were 174 trip requests that Mobility staff recorded as no-shows. Of these:

- One trip record had comments that clearly indicated that the driver arrived more than one hour after end of pickup window. This represented a missed trip and ought to have been recorded as a trip missed by MARTA.
- Three trip records had no comment beyond “cancel trip.” However, the time of the no-show comment was more than two hours beyond the end of pickup window. These three trips were likely missed trips.

Review team members also reviewed trip requests that were coded as “cancellations” after the end of the pickup window. This additional review was prompted by ETA staff coding a trip as a “cancel” rather than a trip missed by MARTA, when a customer no longer wanted a pickup. The vehicle had not arrived six minutes after the end of the 30-minute pickup window (36 minutes after the “ready time”).

For the sample week, Mobility staff created a report that showed 67 cancellations (either same-day, late, or cancel-at-door) for which the time of the cancellation was after the end of the negotiated pickup window. The “tracker comments” in Trapeze indicated that for at least 41 of these trips, the vehicle did not arrive within the pickup window. These trips ought to have been coded as “missed trips.”

Counting the four trip records incorrectly coded as passenger no-shows and the 41 trip records incorrectly coded as cancellations, there were at least 140 missed trips during the sample week, yielding an adjusted missed trip rate of 1.80 percent.

9.7 Analysis of On-Board Travel Times

The review team analyzed a random sample of Mobility trips provided on Wednesday, January 28, 2009.

The sample of 152 trips represented 11 percent of the trips provided that day to Mobility riders. Table 9.4 shows the distribution of travel time for those trips, determined by pickup and drop-off times recorded on vehicle operator manifests. The average travel time for trips in this sample was 36 minutes.

A sample of trips with long travel times was selected for further analysis. Trips with on-board travel times of 60 minutes or longer during the week of January 25 to January 31, 2009, based on scheduled pickup and drop-off times, were identified from a long-trip report generated by

Trapeze. Of the 1,509 scheduled long trips, a sample of 30 trips was selected at random for further analysis. The review team used operator manifests to determine actual travel times for those trips.

Table 9.4– On-board Travel Times for a Random Sample of Mobility ADA Paratransit Trips Provided on Wednesday, January 28, 2009

On-board Travel Time	Number of Trips	Percentage
Up to 15 minutes	23	15%
16-30-minutes	58	38%
31-45 minutes	37	24%
46-60 minutes	18	12%
61-90 minutes	11	7%
91-120 minutes	2	1%
Over 120 minutes	3	2%
Total	152	100%

Twenty-three trips had actual travel times of 60 minutes or more. These travel times were then compared with travel times for comparable trips on the MARTA fixed route system.

MARTA Customer Information Center staff assisted the review team by developing fixed route itineraries and estimating the comparable fixed route travel times using MARTA's automated trip planner. For one trip, no fixed route service was available at the time of the paratransit trip.

The on-board travel times for the final sample of 22 trips, measured from the departure at the pickup location to the arrival at the drop-off location, ranged from 60 minutes to 115 minutes.

Each estimate of fixed route travel time included the following components:

- Travel time on each bus route
- Transfers (waiting time) for multi-route trips (included in fixed route travel time)
- 20 minutes to account for estimated walking time at each end of the trip (and between routes in the middle of the trip, as necessary), using an estimated speed of three miles per hour (20 minutes per mile)

Table 9.5 shows the results of the comparison between paratransit and fixed route travel times for the 22 trips in the final sample. Table 9.5 shows the origin and destination (addresses are rounded to the nearest 100 to maintain confidentiality), the actual departure time from the pickup location and arrival at the drop-off location as recorded on the vehicle operator manifests, and the actual total paratransit travel time. Table 9.5 also shows the fixed routes that would be used to make the comparable fixed route trip, the number of transfers involved, a calculation of travel time on board the buses, an estimate of walking time to the bus stops, and a calculation of total fixed route travel time.

Table 9.5 – Comparison of Travel Times on MARTA Mobility ADA Paratransit Service vs. Fixed Route for Selected Trips, January 25-31, 2009

ADA Complementary Paratransit Trip		Paratransit Travel Time		Fixed Route Equivalent					
Trip #	PU/DO Address (rounded to 100 block)	Actual PU/DO Times	Actual Ride Time (mins)	Itinerary (routes/transfers)	Start/End Times	On-Board Time (mins)	Walk/Wait Time	Total FR Travel Time	Paratransit Travel Time – FR Travel Time (mins)
1	2100 Flintstone Drive, Tucker 2000 Niskey Lake Trail SW, Atlanta	14:02 15:03	61	Route 75 East-West Rail Line Route 170 2 transfers	14:23 16:08	105	20	125	-64
2	300 18 th Street, Atlanta 1600 Treehills Parkway, Stone Mountain	16:33 17:34	61	Route 113 East-West Rail Line Route 111 2 transfers	16:43 18:14	91	20	111	-50
3	600 Peachtree Street NE, Atlanta 2300 Wesley Providence Highway, Lithonia	16:37 17:37	60	North-South Rail Line East-West Rail Line Route 116 2 transfers	16:32 17:59	87	20	107	-47
4	2100 Flintstone Drive, Tucker 6700 Chupp Road, Lithonia	14:32 15:40	68	Route 121 Route 115 1 transfer	15:20 16:54	94	20	114	-46
5	1800 Phillips Road, Lithonia 300 N. Crossing Way, Decatur	10:20 11:41	81	Route 116 Route 186 Route 1 East-West Rail Line 3 transfers	10:25 12:10	105	20	125	-65
6	2100 Flintstone Drive, Tucker 2700 Rainbow Forest Drive, Decatur	14:14 15:14	60	Route 75 East-West Rail Line Route 186 2 transfers	14:23 15:35	72	20	92	-32
7	5600 Strathmore Manor Circle,	07:24	64	Route 115	07:17	74	20	94	-30

ADA Complementary Paratransit Trip		Paratransit Travel Time		Fixed Route Equivalent					
Trip #	PU/DO Address (rounded to 100 block)	Actual PU/DO Times	Actual Ride Time (mins)	Itinerary (routes/transfers)	Start/End Times	On-Board Time (mins)	Walk/Wait Time	Total FR Travel Time	Paratransit Travel Time – FR Travel Time (mins)
	Lithonia 700 W. Peachtree Street NW, Atlanta	08:28		East-West Rail Line North-South Rail Line 2 transfers	08:31				
8	80 Jesse Hill Drive SE, Atlanta 6200 Hillandale Drive, Lithonia	16:27 17:37	70	Route 186 Route 86 1 transfer	16:11 17:30	79	20	99	-29
9	3600 Cameron Hills Place, Ellenwood 100 Executive Park West NE, DeKalb	05:01 06:22	81	Route 15 East-West Rail Line Route 8 2 transfers	05:16 06:43	87	20	107	-26
10	4800 White Oak Path, Stone Mountain 2100 Marietta Blvd NW, Atlanta	07:09 08:25	76	Route 111 East-West Rail Line Route 60 2 transfers	06:50 08:07	77	20	97	-21
11	2700 Osborne Road NE, Atlanta 3600 Cloudland Drive, Stone Mountain	15:34 16:47	73	Route 25 Northeast-South Rail Line East-West Rail Line 2 transfers	14:21 15:35	74	20	94	-21
12	2600 Piedmont Road NE, Atlanta 500 N. Indian Creek Drive, Clarkston	17:00 18:09	69	Route 245 Route 121 1 transfer	16:40 17:46	66	20	86	-17
13	1300 Moreland Avenue SE, Atlanta 2100 MLK Jr. Drive SW, Atlanta	10:20 11:35	75	Route 49 Route 3 1 transfer	10:33 11:42	69	20	89	-14
14	6300 Creekford Drive, Lithonia	09:45	115	Route 115	09:20	109	20	129	-14

ADA Complementary Paratransit Trip		Paratransit Travel Time		Fixed Route Equivalent					
Trip #	PU/DO Address (rounded to 100 block)	Actual PU/DO Times	Actual Ride Time (mins)	Itinerary (routes/transfers)	Start/End Times	On-Board Time (mins)	Walk/Wait Time	Total FR Travel Time	Paratransit Travel Time – FR Travel Time (mins)
	6100 Old National Highway, College Park	11:40		East-West Rail Line Northeast-South Rail Line Route 189 3 transfers	11:09				
15	2300 Wallingford Drive, Decatur 5000 Peachtree Industrial Boulevard, Atlanta	06:28 07:52	84	Route 9 Northeast-South Rail Line 1 transfer	06:07 07:24	77	20	97	-13
16	1200 James Jackson Parkway NW, Atlanta 5800 Glenridge Drive NE, Atlanta	07:59 09:21	82	Route 153 East-West Rail Line North-South Rail Line 2 transfers	07:12 08:25	73	20	93	-11
17	100 Broad Street SW, Atlanta 4500 Cedar Glen, Stone Mountain	16:54 17:57	63	East-West Rail Line Route 120 1 transfer	16:00 16:46	46	20	66	-3
18	4200 Autumn Woods Court, Stone Mountain 100 Warren Street SW, Atlanta	08:35 09:35	60	Route 119 East-West Rail Line Route 24 2 transfers	08:08 08:50	42	20	62	-2
19	3200 Albatross Lane, Decatur 1800 S. Ponce de Leon Avenue NE, Atlanta	07:43 08:43	60	Route 114 Route 2 1 transfer	07:24 08:06	42	20	62	-2
20	3000 Cocklebur Road, Decatur 600 Piedmont NE, Atlanta	06:42 08:07	85	Route 186 Route 110	06:47 07:46	59	20	79	6

ADA Complementary Paratransit Trip		Paratransit Travel Time		Fixed Route Equivalent					
Trip #	PU/DO Address (rounded to 100 block)	Actual PU/DO Times	Actual Ride Time (mins)	Itinerary (routes/transfers)	Start/End Times	On-Board Time (mins)	Walk/Wait Time	Total FR Travel Time	Paratransit Travel Time – FR Travel Time (mins)
				1 transfer					
21	3600 Orchard Circle, Decatur 700 W. Peachtree Street NW, Atlanta	07:08 08:25	77	Route 96 East-West Rail Line North-South Rail Line 2 transfers	07:07 07:51	44	20	64	13
22	4100 Deacon Lane, Chamblee 600 Peachtree Street NE, Atlanta	06:15 07:52	97	Route 25 Northeast-South Rail Line 1 transfer	06:24 06:57	33	20	53	44

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ADA Complementary Paratransit Trip		Paratransit Travel Time		Fixed Route Equivalent					
Trip #	PU/DO Address (rounded to 100 block)	Actual PU/DO Times	Actual Ride Time (mins)	Itinerary (routes/transfers)	Start/End Times	On-Board Time (mins)	Walk/Wait Time	Total FR Travel Time	Paratransit Travel Time – FR Travel Time (mins)
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22	4100 Deacon Lane, Chamblee 600 Peachtree Street NE, Atlanta	06:15 07:52	97	Route 25 Northeast-South Rail Line 1 transfer	06:24 06:57	33	20	53	44

The final two columns of Table 9.5 compare the ADA complementary paratransit services with MARTA fixed route travel times. The “Travel Time Difference” column presents the difference in travel times between the two modes. A minus sign (-) indicates that the ADA complementary paratransit travel time would have been *less* than the estimated fixed route travel time.

As shown in Table 9.5, all of the fixed route trips involved one or more transfers:

One transfer: 9 trips

Two transfers: 10 trips

Three transfers 3 trips

Three of the 22 itineraries, or 14 percent, had paratransit travel times that were longer than the comparable fixed route travel time. The differences in travel time between paratransit and the MARTA fixed route services ranged from four minutes to 44 minutes, with an average of 21 minutes. The other 19 paratransit trips, or 86 percent, would have taken from two to 65 minutes more time using fixed route service (an average of 27 more minutes).

Comparison to MARTA On-Board Travel Time Standard

At the time of the review, MARTA’s internal standard for on-board travel time for Mobility riders was the estimated fixed route travel time plus an estimated walking time of 30-minutes per trip. Using that standard, three of the trips in the sample of 22 trips with on-board travel times of 60 minutes or more (or 14% of the sample) were longer than the comparable fixed route trip.

9.8 Findings

1. For the sample day, MARTA was on time for only 58.9 percent of the sampled trips. If trips with pickups that occurred prior to the start of the pickup window are included, this increases to 87.4 percent; however, passengers cannot be compelled to begin their trips early and on-time performance should not be dependent upon a portion of substantially early pickups.) The latter was comparable to the on-time performance reported by MARTA for that day, 90.6 percent, but below MARTA’s target of 95 percent. The percentage of pickups that took place before the beginning of the window was 28.5. These on-time performance levels suggest the existence of a capacity constraint in violation of §37.131(3)(i)(A) of the DOT ADA regulations. MARTA must develop a plan to review operational practices and identify ways to increase on-time performance for Mobility pickups within the pickup window.
2. At the time of the review, while MARTA recorded actual drop-off times for all trips and tracked drop-off performance for all Mobility trips with requested appointment times, it did not have a standard for drop-off performance. Of the 151 sampled Mobility trips, 72 had specified appointment times. The analysis showed that 83.3 percent of these trips had on-time drop-offs and 17.7 percent did not. This represented poor performance as one of every six riders with a known appointment arrived late. MARTA has an implicit obligation to get riders to appointments on time (not late) and an explicit obligation to monitor performance to insure that Mobility service is operated without any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons. Operational practices that

- cause riders to arrive late to appointments may discourage riders from using the service, which would constitute a capacity constraint prohibited by the DOT ADA regulations. Review team members noticed that reservationists almost always used a 90 minute “Global” travel time parameter setting in Trapeze, rather than a more refined travel time settings linked to the length of the trip. This could contribute to late drop-offs for long trips. MARTA must develop an on-time standard or window for on time drop-offs to appointments; continue to track, measure review and report drop-off performance for all trips with a requested appointment time; and to print the appointment times on driver manifests for all trips with a requested appointment time. As part of MARTA’s response to this finding, please provide copies of these standards and directives to FTA.
3. To meet its obligations to negotiate pickup times under §37.131(b)(2), MARTA must ensure that schedulers and dispatchers do not adjust the rider’s scheduled pickup time (ready time) or the pickup window without the rider’s consent and must limit any changes to within 60 minutes of the requested pickup time. Review team observations raised issues with MARTA’s scheduling practices at the time of the review: First, the biggest challenge to the schedulers was the shortage of available runs; according to the scheduling supervisor, this was due to a lack of available drivers on most weekdays. Even with the capacity created by same-day cancellations and no-shows, the scheduling supervisor acknowledged that the overnight and morning dispatchers’ insertion of unscheduled trips onto the available vehicle runs led to scheduling violations, such as late pickups and drop-offs and/or long travel times. Second, while Mobility’s policy was to obtain rider approval when an estimated pickup time fell out of the negotiated pickup window, the schedulers said that these calls did not always occur. Third, the scheduling supervisor confirmed review team observations that the software was set to schedule the pickup at least 90 minutes prior to the appointment time, regardless of the distance or estimated travel time. Finally as discussed on Page 72 of this report, it was also observed that the scheduling software would sometimes generate inappropriate pickup times (the system generated early morning pickups at 6 or 7 a.m. for pickups in the early or late afternoon). MARTA should continue to investigate this problem, as a solution to the issue could not be found during the on-site review. MARTA must direct staff and contractors to honor the negotiation window and document all customer contact regarding changes to the ready time and/or the pickup window, and provide a copy of the directive to FTA. As part of MARTA’s response to this finding, FTA requests MARTA’s current definition(s) of Mobility denials and the number of Mobility ADA paratransit trips, requested, scheduled, provided, and denied for the past six months.
 4. At the time of the review, MARTA incorrectly defined and undercounted late trips and missed trips, preventing MARTA from identifying potential capacity constraints in the system. MARTA had not set a performance standard for avoidance of late or missed trips. MARTA must revise its definition of a missed trip to include any attempted pickup after the end of the pickup window that does not result in a passenger being transported, either due to the rider turning down or cancelling the trip, or the rider no longer being at the pickup location. If a vehicle does not arrive within the pickup window, the rider has no obligation to wait for the vehicle and is under no obligation to board the vehicle. If the rider elects to board a vehicle that

arrives after the pickup window, that pickup must be counted as a late pickup. To meet the requirements of §37.125(h)(1)-(3) and §37.131(f)(3)(i)(B) of the DOT ADA regulations, MARTA must operate Mobility without a substantial number of missed trips and must ensure that trips missed by MARTA are not counted against the passenger. As discussed in Chapters 8 and 9, MARTA must revise the coding from cancellations and denied trips to missed trips for those pickups cancelled by riders informed that the vehicle is going to be more than 60 minutes late. MARTA must direct ETA clerks and other employees to code missed trips properly to ensure that riders are not experiencing a substantial number of trips missed due to transit system error and that such trips are not counted as no-shows against the rider. MARTA must also establish a performance goal of zero missed trips and a performance standard on late trips. As part of MARTA's response to this finding, please provide copies of the directive(s) to FTA.

5. At the time of the review, there did not appear to be explicit procedures for employees to follow prior to declaring no shows or to verify that reported no-shows were in fact no-shows. Review team analysis of the sample week indicated there were at least 140 missed trips, yielding an adjusted missed trip rate of 1.80 percent; the review team found four trip records incorrectly coded as passenger no-shows and 41 trip records incorrectly coded as cancellations by ETA clerks. Based upon the information provided to FTA, MARTA did not appear to have a procedure in place to verify that the vehicle had waited 5 minutes per MARTA policy, had arrived within the pickup window at the correct pickup location or that that dispatch had made an attempt to locate the rider. MARTA must review Mobility trip data, particularly no-shows and cancellations, to ensure that these are being correctly categorized. As part of MARTA's response to this finding, develop such policies and procedures and provide copies to FTA.
6. At the time of the review, MARTA's no-show suspension policy did not appear to make distinctions between no-shows within a rider's control, those due to circumstances beyond the rider's control and those due to system error. MARTA must revise its no-show suspension policy as follows:
 - The vehicle must arrive within the pickup window and the vehicle operator must wait 5 minutes, per MARTA's policy, before a no-show is declared
 - No-shows that are not within the customer's control will not be counted against the rider
 - The advance notice of the proposed suspension must be provided in writing and the number of days of advance-notice must be specified
 - Riders' frequency of use must be taken into account, to ensure that sanctions are imposed only for a pattern or practice of missing scheduled trips and not isolated accidental or singular incidents
 - The length and reasonableness of all proposed suspensions must be revised. The policy called for a 14-day suspension if a rider accumulated four no-shows within a floating six-month period, a 30-day suspension if the rider accumulated an additional four no-shows in a subsequent six-month period

and a six-month suspension if a rider accumulated 12 no-shows within a floating 12-month period

As part of MARTA's response to this finding, please also provide the current no-show rate for Mobility service.

7. To meet its obligations under §37.125(h)(3), MARTA must establish an explicit appeals process and make it available to an individual on whom sanctions have been proposed and submit the appeals policy to FTA. The policy must call for the sanction to be stayed pending the outcome of the appeal. The appeals process must meet the requirements of 37.125(g). As part of MARTA's response to this finding, please provide the requested information to FTA.
8. Based on the information provided to FTA, at the time of the review, there did not appear to be an explicit procedure for monitoring Mobility trip lengths to ensure they were not excessive. While MARTA had established an internal standard for Mobility on-board time of fixed route travel time plus an estimated walking time of 30 minutes per trip, consistent with FTA technical assistance, MARTA had not established a target percentage of Mobility trips that were expected to meet the standard. MARTA was therefore unable to identify potential capacity constraints in the system. Review team analysis of a sample of Mobility trips that had travel times of 60 minutes or more found that 14 percent of the sample was not comparable to fixed route travel times on the sample day. If these results were extrapolated to Mobility service as a whole, about 1.5 percent of Mobility trips took longer than comparable fixed route trips. To meet its obligations under 37.131(f)(3)(i)(C) to operate Mobility service without substantial numbers of trips with excessive trip lengths, MARTA has an explicit obligation to monitor Mobility service to ensure that trip lengths are not excessive and adjust scheduling and dispatching practices to reduce the number and percentage of Mobility trips with travel times that exceed MARTA's maximum on-board travel time standard established internally at the time of the review and those are longer than comparable fixed route trips. MARTA must also establish a performance standard on comparable trip length. As part of MARTA's response to this finding, please provide copies of performance standard and monitoring plan to FTA.

9.9 Recommendations

1. The model drop-off policy would also prevent riders from arriving substantially early (for example, more than 30 minutes prior to the rider's desired arrival time).
2. Consider reviewing operational practices to reduce the number of MARTA drop-offs that are more than 30 minutes ahead of the requested appointment time. The review team noticed that reservationists usually allowed at least 90 minutes from pickup time to appointment time, regardless of the distance to travel. A high proportion (38.9) percent of sampled trips with appointment times had very early drop-offs—arrivals more than 30-minutes early. This may be a concern for riders dropped off at a location that may not be open that far in advance of an appointment.

3. As discussed in Chapter 10 of this report, consider increasing the paratransit driver workforce to enable all scheduled runs to be covered and to provide an adequate extraboard for paratransit operations. While the vehicle fleet and spare ratio were adequate for the number of runs scheduled, at the time of the review, MARTA did not have an adequate driver workforce to cover all scheduled runs. As discussed in Chapter 9, on a typical weekday, the schedulers left 100 trips unscheduled. According to the scheduling supervisor, there was usually a shortage of available runs due to a shortage of drivers on most weekdays. Review of run coverage for the sample week of January 24 to 30, 2009, indicated that between 1 and 8 percent of runs were closed on weekdays due to a lack of drivers and 9 percent of runs were closed on weekends. Run closures result in unscheduled trips and same day add-ons to already full runs that can negatively impact on-time performance and ride times.
4. Look at scheduling practices and other operating resources, beyond drivers, to determine how to improve on-time pickup performance for Mobility.
5. As discussed in Chapter 10 of this report, review paratransit vehicle maintenance practices to ensure that they are adequate. Several of the drivers interviewed as part of the review indicated that vehicle maintenance could be improved.
6. As discussed in Chapter 10 of this report, provide an adequate operating budget to meet estimated ADA paratransit expenses. MARTA's process for estimating Mobility operating costs appeared to be thorough. The estimates of a 10 percent ridership increase in FY 2009 and the need for 8 percent more vehicle-revenue-hours seemed appropriate. However, final budget decisions did not appear to consider these estimates. The FY 2009 operating budget provided less than a 1 percent increase over FY 2008 actual expenses. To meet its obligations under §37.121-131 of the DOT ADA regulations, MARTA must budget, plan and schedule to meet current and unmet demand.
7. Refine the practice of scheduling a Mobility pickup 90 minutes ahead of all requested pickups. This is a likely contributor for the high proportion of very early drop-offs.
8. As discussed in Chapters 8 and 9. Refine the Trapeze travel time parameter settings to ensure that an appropriate amount of time is factored into the scheduling of trips with varying distances. In addition to the 90 minute "Global" travel time setting, it is recommended that MARTA utilize the "On-Board Time Matrix" in Trapeze to set maximum travel times for trips of varying distances. It is recommended that different settings in this matrix be tested until settings that produce comparable trip lengths for shorter and longer trips are identified. It is recommended that this testing be done off line before using the settings in actual service.

10 Resources

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

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

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

10.1 Customer Comments

The ten riders and agency staff interviewed in advance of the on-site review had mixed experiences with the drivers – some good and some bad. Concerns were raised about driver training. Three respondents had concerns about how well mobility devices were being secured in the vehicle. One rider indicated that drivers often do not assist riders with lap belts. Two respondents indicated they had seen drivers using cell phones while on duty—apparently for personal calls. Another felt that improved sensitivity training drivers was needed.

There were also mixed responses regarding the condition of paratransit vehicles. Some people felt that they were new and clean, while other felt that the vehicles were not well maintained. At least two of the respondents indicated that the vehicles had a rough ride.

Both of the formal complaints on file at FTA included issues related to driver performance. Both expressed concerns about cell phone use by drivers. One suggested that drivers needed better training in customer service skills. Neither formal complaint to FTA mentioned vehicles or vehicle condition.

Some driver and vehicle issues were included in complaints on file at MARTA. Thirteen of the 168 rider issues conveyed to MARTA in December 2008 (7.7 percent) were about driver performance. One was about vehicle condition—about 0.6 percent.

10.2 Driver Comments

As mentioned in Chapter 9, review team members interviewed 10 drivers, using a standard set of questions (Attachment F). Three of the interview questions related to training and vehicle condition.

Drivers were asked if the training they received adequately prepared them for the job. All 10 drivers responded that they felt the training was good to excellent and did prepare them for the

job. One driver indicated that no training, however good, could fully prepare someone for the job—drivers needed to experience what the service required. One driver gave the training a rating of “8.5 on a scale of one to 10” and said that additional on-the-street orientation to the area would be helpful. He said that his on-the-road training took place very early in the day, much of it before dawn, and he didn’t learn the streets as well as he would have liked.

Drivers were also asked if they received periodic refresher training. Several indicated that a refresher training course was underway at the time of the on-site review. Three drivers indicated that refresher training was typically provided when new vehicles or new equipment were obtained and that the training focused on learning the new equipment. One driver, with three years on-the-job, said refresher training was only provided as needed—if there were incidents. One driver said he had participated in refresher training “once or twice” in his two years on the job. One driver said refresher training is only provided if drivers are out for an extended period of time and then return to the job. Two drivers, one with two years experience and one with seven years of experience, said they had not received refresher training during their time on the job.

Drivers were also asked about vehicle condition and maintenance. There were mixed responses. Four drivers said that maintenance was good and vehicles were repaired promptly. One of these three said that things noticed in the daily inspections were “sometimes not fixed,” and a second said that while repairs were made, the vehicles were not always kept clean. Two drivers said that maintenance was “fair” and another rated it a 7.5 on a scale of one to ten. The two who said “fair” indicated that repairs of minor items were sometimes not made promptly. The remaining three drivers indicated that maintenance was not good. One of these three rated it as a 3 on a scale of one to ten, and another said that maintenance was “terrible” and that the vehicles were not kept clean and repairs were not made promptly. Two drivers indicated some issues with vehicle design; both said that the steps were too high and that the placement of mirrors was not good. One driver said that the location of the farebox was less than ideal and that the restraint systems could come loose in transit.

10.3 Vehicle Fleet and Vehicle Availability

At the time of the on-site visit, MARTA operated a fleet of 175 lift-equipped body-on-chassis minibuses that accommodated up to six ambulatory passengers and three passengers using wheelchairs.

Table 10.1 shows the fleet by model year. As shown, the fleet was fairly new. One hundred and twenty-five were 2007 model year vehicles and the remaining 50 were 2008 model year vehicles. The average fleet age was therefore only 1.7 years.

A review of the run structure established by MARTA showed that between 111 and 122 vehicles were needed on weekdays to meet peak pullout. The maximum weekday pullout of 122 vehicles was on Wednesdays. With 175 total vehicles, this provided for 53 to 64 spare vehicles on weekdays, a 43 to 58 percent spare ratio. This spare ratio appeared to be relatively high and more than adequate.

Table 10.1 – MARTA Mobility Fleet by Model Year

Model Year	Totals
2007	125
2008	50
Totals	175

Daily vehicle availability records were also reviewed. These records showed that at the time of the on-site review there were enough vehicles to always cover the number of runs created. On weekdays, there were about 30 available spares, beyond the vehicles needed, to start the day.

MARTA managers and operations staff mentioned that prior to the summer of 2008 and the purchase of the 50 2008 model year vehicles, there were not always enough vehicles to meet daily pullout. They indicated that the operation was “often down ten vehicles” on high demand weekdays.

10.4 Run Coverage and Extraboard/Standby Drivers

To determine if there was an adequate workforce to cover scheduled runs and the level of backup typically available on the day of service, the review team analyzed MARTA’s “Paratransit Daily Operator Compliment” records for the week of January 24 to 30, 2009. These records showed the total driver workforce and the number of drivers out (both scheduled and unscheduled) each day. The records also showed the number of runs created each day, the number of open runs due to driver call-outs, and the number of “extra work” drivers available to cover open runs each day. A copy of the records for the sample week is provided in Attachment G.

As the “Paratransit Daily Operator Compliment” records show, MARTA had a total of 177 full-time and 68 part-time drivers at the time of the on-site review. On a typical weekday, 24 to 30 drivers were scheduled out on short- and long-term leave or were unscheduled call-outs.

Table 10.2 summarizes the information provided in the “Paratransit Daily Operator Compliment” records for the sample week of January 24 to 30, 2009. It shows the total number of runs scheduled for each day, the number of drivers who were out each day (which was also the number of open runs), the number of “extra work operators” available each day to cover open runs, and the number of runs that could not be covered and which were “closed” each day.

As shown, between 24 and 32 runs were “open” on weekdays due to drivers being either scheduled or unscheduled “outs.” On weekdays, there were 16 to 27 extra work drivers available. On one weekday (Thursday, January 29) there were enough extra work drivers to cover all open runs. On the other four weekdays, though, between three and 16 runs were closed each day. This represented from 1 to 8 percent of all runs for the day.

Table 10.2 – MARTA Run Coverage, January 24 to 30, 2009

Date	No. of Scheduled Runs	No. of Drivers Out	Avail. Extra Work Drivers	No. (%) of Runs “Closed”
Sat., Jan. 24	77	21	14	7 (9%)
Sun., Jan. 25	79	16	9	7 (9%)
Mon., Jan. 26	196	32	16	16 (8%)
Tues., Jan. 27	221	29	20	9 (4%)
Wed., Jan. 28	214	30	27	3 (1%)
Thurs., Jan. 29	223	24	25	0 (0%)
Fri., Jan. 30	212	30	16	14 (7%)

On Saturday, there were 21 drivers out (and therefore 21 open runs). There were 14 available extra work drivers, meaning that seven runs had to be closed (7 percent of all scheduled runs). On Sunday, 16 runs were open and nine extra work drivers were available, meaning that seven runs had to again be closed (9 percent of all runs).

The review of the pullout records for this sample week indicated that MARTA had a chronic shortage of available drivers. Between 1 and 9 percent of scheduled runs appeared to be regularly closed due to driver shortages. This led to many same-day add-ons, overly tight schedules, and late and long trips.

10.5 Driver Training and Turnover

MARTA paratransit drivers received at least 40 days (eight weeks) of training before being placed into service on their own. This included 22 days of classroom training and a minimum of 18 days of on-the-road training. Additional on-the-road training was provided on an as needed basis.

The training covered Mobility policies and procedures, familiarity with vehicles and equipment, map reading and orientation to the area, defensive driving, customer service, ADA requirements, and disability awareness training. It also included modules on required paperwork, radio protocol, MARTA personnel policies, and other issues.

The training curriculum appeared extensive and complete. As mentioned earlier in this section, all of the 10 drivers interviewed indicated that they felt the training adequately prepared them for the job. The one suggested improvement from a driver was for more on-the-road orientation to the service area.

Refresher training did not appear to be as extensive. The 10 drivers indicated they had either received no refresher training or that refresher training was only provided in the past when new equipment was received or as needed by individual drivers following an incident. At the time of the on-site review, MARTA was in the process of providing more general refresher training. A review of driver records showed that 19 of the 177 full-time drivers were hired between February 1, 2008 and January 31, 2009. Fifty of the 68 part-time drivers were also hired in this

one-year period. This suggested an annual post-training turnover rate of about 28% for 2008 and the first part of 2009. At the time of the on-site visit there were no new drivers in training.

10.6 Other Staffing

Staffing levels in the reservations, scheduling, and dispatch areas are detailed in Chapters 7 and 9. At the time of the on-site review, MARTA employed eight reservations agents plus a call center supervisor, six ETA agents, two schedulers plus a scheduling supervisor, and 10 dispatchers and assistant supervisors.

10.7 Planning, Budgeting, and Funding

The review team met with MARTA's Mobility Program Director and staff from the budget department to review the process used to plan and budget for Mobility services each year. MARTA used a July-to-June fiscal year and planning, and budgeting for the upcoming year began each year in December. The budget department sent each part of the agency its current-year allocations, prior-year statistics, and year-to-date statistics. Each department was then responsible for developing service and budget estimates for the next year.

The Mobility Program Director developed a budget by estimating ridership for the upcoming year. This was done by analyzing ridership levels in recent years as well as recent trends in the current fiscal year. Next, she estimated the number of vehicle-hours that would be required to serve the projected ridership. This required her to make assumptions about the productivity of the service—the number of trips per hour that will likely be able to be served for each vehicle-hour put on the street. Once the estimate of vehicle hours was prepared, she was able to estimate her budget needs. The vehicle-hour estimate led to the number of drivers and vehicles she would need, which in turn allowed for an accurate estimate of salaries, fringe benefits and vehicle operating costs. Some operating costs, such as fuel costs, were developed by projecting a number of vehicle-miles. Other personnel needs and costs, such as call center, scheduler, and dispatcher staffing levels could also be developed based on the projected changes in ridership.

Data used to develop the FY 2009 Mobility budget was obtained and discussed with MARTA staff. Key information obtained and reviewed is provided in Table 10.3. The data sheet provided by MARTA staff, from which the information in the table is taken, is provided in Attachment H. Table 10.3 shows actual Mobility ridership, vehicle-revenue-hours, driver "head count," and direct net operating expenses for FY 2006, FY 2007 and FY 2008. It also shows the estimated ridership, revenue-hours, and budget for FY 2008. Finally, it shows the estimated and budgeted service levels, staffing and operating costs for FY 2009.

Table 10.3 – MARTA Mobility program Service Data and Operating Budgets and Expenses, FY 2006 – FY 2009

	FY 2006 Actual	FY 2007 Actual	FY 2008 Estimate/ Budget	FY 2008 Actual	FY 2009 Estimate/ Budget
Mobility Program Ridership	289,258	312,311	343,848	346,520	381,546
% Increase Over Prior Year	NA	8%	10%	11%	10%
Mobility Program Vehicle-Revenue-Hours	221,713	247,990	275,268	283,788	305,236
% Increase Over prior Year	NA	12%	11%	14%	8%
Actual and Estimated Productivity	1.30	1.26	1.25	1.22	1.25
Mobility Program Direct Net Operating Expenses	\$8,997,298	\$11,480,641	\$11,813,547	\$12,310,644	\$12,355,769
% Increase Over Prior Year	NA	28%	3%	7%	0%
Driver Head Count: Full-Time	127	171	NA	171	171
(Actual) Part-Time	48	48	NA	48	63

Mobility Program ridership increased by 8 percent from FY 2006 to FY 2007, then increased another 11 percent between FY 2007 and FY 2008. For FY 2009, the Mobility Program Director estimated that ridership would increase 10 percent (based on the historical record). Ridership of 381,546 was included for FY 2009.

Vehicle-revenue-hours increased at a slightly higher rate than ridership from FY 2006 through FY 2008. From FY 2006 to FY 2007, vehicle-revenue-hours increased by 12%, then by 14% between FY 2007 and FY 2008. Actual productivity from FY 2006 through FY 2008 ranged from 1.22 trips per vehicle-revenue-hour to 1.30 trips per vehicle-revenue-hour. For FY 2009, the Mobility Program Director used an estimated productivity of 1.25 to estimate that the program would need to operate 305,236 vehicle-revenue-hours.

Based on an estimated 305,236 vehicle-revenue-hours, the Mobility program Director estimated a need for 248 drivers. The original FY 2009 budget only included 234 drivers and all of the increase over FY 2008 was in part-time drivers. Approval was received during the year to increase the head count to 177 full-time and 68 part-time drivers (245 total).

Interestingly, while a ridership increase of 10 percent was projected, and an 8 percent increase in revenue hours was included, the direct net operating budget increased by less than 1 percent between FY 2008 and FY 2009. MARTA staff could not explain why the approved budget for FY 2009 had not been more in line with the revenue-hour increase.

The review team noticed that while the direct net operating budget had increased by 7 percent between FY 2007 and FY 2008, the approved head count had not increased at all. In addition, even though an 8 percent increase in revenue-hours had been projected for FY 2009, the approved head count at the beginning of the year was again not increased over the FY 2007 or FY 2008 levels.

10.8 Ridership

As indicated above, the projected ridership for the fiscal year was 381,546 one-way passenger trips. To determine how this level of ridership compared with other transit properties, the review team used a recently developed national ADA paratransit ridership model to estimate the predicted ADA paratransit ridership in the MARTA area. The national model, developed by the Transportation Cooperative Research Program (TCRP) and detailed in *TCRP Report 119, Improving ADA Complementary Paratransit Demand Estimation*, used data from 28 transit systems across the country to model ADA paratransit demand. The model estimates ADA paratransit demand based on the population of the service area, the base fare charged, the percentage of the population with household incomes below the poverty level, the effective window used to determine on-time performance, the percentage of applicants found conditionally eligible, and whether conditional eligibility is used to do trip-by-trip eligibility in operations.

To estimate demand for the MARTA area using this national model, the review team used a service area population of 1,650,000, obtained from MARTA's on-line public information. A base ADA paratransit fare of \$3.50 was used. U.S. Census information was used to estimate the poverty rate, which indicated that 9.4 percent of the population in the Atlanta area had a

household income below the poverty level. A conditional eligibility rate of 50 percent was used (lower than the 81 percent indicated in Chapter 6 but more realistic in terms of national outcomes). An on-time window of 30-minutes was used. Finally, the model was set to reflect that MARTA does not use trip-by-trip eligibility.

Using these factors, the TCRP model estimated demand for ADA paratransit service in the MARTA area to be 460,693 one-way trips. This is about 20 percent higher than the estimated ridership for FY 2009. A copy of the summary page from the model showing the estimation for the MARTA area is provided in Attachment I.

10.9 Findings

1. There were no findings of non-compliance requiring corrective action in Chapter 10 of this report. See Section 10.10 below for recommendations.

10.10 Recommendations

1. All ten drivers interviewed indicated that they felt the training program adequately prepared them for the job. One driver suggested increasing on -the-road orientation to the service area.

Attachment A
MARTA Response to Draft Report

On October 31, 2012, FTA transmitted the draft report to MARTA electronically for review and response within ten days. FTA did not receive a response from MARTA.

Attachment B
On Site Review Schedule

**ADA Complementary Paratransit Compliance Assessment
Metropolitan Atlanta Rapid Transit Authority (MARTA)
February 9-12, 2009**

PROPOSED SCHEDULE (2-4-09), PAGE 1

Time	Activity	Who	Where
Monday, February 9, 2009			
9:00 AM	Opening conference	FTA; MARTA staff; All assessment team members	2424 Piedmont
9:30 AM	Review paratransit service design, policies, standards, service statistics, and other information sent in advance.	All assessment team members; MARTA Paratransit Manager and other appropriate staff	2424 Piedmont
10:30 AM	Paratransit planning and budgeting; Review recent operating budgets and capital purchases and plans, and approved staffing levels	Russell Thatcher; MARTA Budget Manager, Paratransit Manager and other appropriate staff	2424 Piedmont
10:30 AM	Review customer comment process; Review complaints by type for the past year; Review responses to complaints.	Patti Monahan; MARTA staff who coordinate paratransit complaint process.	2424 Piedmont
10:30 AM	Review paratransit service area, fares, days and hours, rider assistance policies	David Chia; MARTA staff as needed to explain fixed route policies and comparable paratransit policies	2424 Piedmont
1:00 PM	Tour paratransit call center (reservations)	All assessment team members MARTA Paratransit Manager and Call Center Manager	2424 Piedmont
1:30 PM	Review phone system design; Review phone performance (ACD) reports; Review call center staffing levels, training, and turnover.	Russell Thatcher, Patti Monahan; Call Center Manager	2424 Piedmont
1:30 to 5:00 PM	Observe trip reservations process (using phone splitters if possible)	All assessment team members (David Chia from 1:30-5, Russ Thatcher and Patti Monahan from 3-5); MARTA reservationists	2424 Piedmont
Tuesday, February 10, 2009			
8:30 AM	Observe reservations process (using phone splitters if possible)	All assessment team members	2424 Piedmont
10:00 AM	Tour paratransit operations center	MARTA Paratransit Manager; All assessment team members	1040 Brady
10:30 AM	Meet with Lead Scheduler; Discuss scheduling procedures, run structure; system parameters. Generate special reports as needed on long trips, travel times, no-shows, on-time arrivals.	David Chia, Russell Thatcher, MARTA Lead Scheduler and IT/Data Specialist as needed.	1040 Brady
10:30 AM	Identify sample of long trips. Begin analysis of paratransit versus fixed route travel times	Patti Monahan; MARTA schedulers and IT Data Specialist as needed.	1040 Brady
11:30 AM	Begin review of on-time performance, no-shows and missed trips	David Chia; MARTA IT Data Specialist as needed.	1040 Brady
11:30 AM	Review eligibility determination process and records; review no-show and service suspension records; Begin review of 30 recent determinations	Russell Thatcher; MARTA eligibility coordinators; MARTA No-Show Coordinator	1040 Brady
11 AM - 1 PM	Interview drivers	All assessment team members	1040 Brady
3-5:00 PM	Observe "Where's My Ride (WMR)?" calls (using phone splitters if possible)	David Chia; MARTA WMR call-takers	1040 Brady
3-5:00 PM	Observe dispatch process (using phone splitters if possible).	Russell Thatcher, MARTA dispatchers	1040 Brady

**ADA Complementary Paratransit Compliance Assessment
Metropolitan Atlanta Rapid Transit Authority (MARTA)
February 9-12, 2009**

PROPOSED SCHEDULE (2-4-09), PAGE 2

Time	Activity	Who	Where
Wednesday, February 11, 2009			
8:00 AM	Review driver workforce, driver training, driver turnover. Examine run pull-out records. Examine daily fleet availability records.	Russell Thatcher; MARTA Paratransit Manager, Pull-out Supervisor, Maintenance Manager	1040 Brady
8:00 AM	Continue on-time performance analysis; No-show analysis	David Chia; MARTA IT Data Specialist as needed	1040 Brady
8:00 AM	Continue travel time analysis (with fixed route customer service staff as needed)	Patti Monahan; MARTA fixed route trip planning staff as needed.	1040 Brady 2424 Piedmont
10:00 AM	Continue eligibility determination review – 30 recent determinations	Russell Thatcher; MARTA Eligibility Coordinator	1040 Brady
10 AM - 1 PM	Interview drivers	All assessment team members	1040 Brady
3-5:00 PM	Additional “Where’s My Ride?” and dispatch Observations; Additional Special Reports and analysis as needed	All Assessment Team members MARTA Ops. Manager, dispatchers, WMR agents, and IT Manager as needed	1040 Brady
Thursday, February 12, 2009			
8:00 AM	Additional analysis as needed; Tabulate and analyze data	All assessment team members; Various MARTA staff as needed.	2424 Piedmont; 1040 Brady
2:00 PM	Exit Conference	FTA, MARTA staff, All assessment team members	2424 Piedmont

Attachment C
ADA Paratransit Eligibility Application Materials



2424 Piedmont Rd. N.E.
Atlanta, GA 30324-3330
404-848-5000

SUBJECT: APPLICATION FOR MOBILITY ELIGIBILITY

Dear Applicant:

The Metropolitan Atlanta Rapid Transit Authority (MARTA) appreciates your interest in our Mobility services. The Americans with Disabilities Act of 1990 (ADA) requires MARTA to provide equivalent public transportation to individuals with disabilities who cannot board, ride, or get to an accessible fixed route bus or train due to their disabilities. This service must be comparable to the service that is provided to individuals without disabilities who use MARTA's regular fixed-route system.

If you have a current diagnosed disability that prevents you from using a MARTA lift-equipped bus or the accessible rail system, you may be eligible for Mobility Services. If your disability does not prevent you from using a lift-equipped bus or the accessible rail system, you may take advantage of MARTA's **half-fare card** program for individuals with disabilities. The card allows you to travel at half the regular fare (currently, 85 cents one-way) on both the bus and rail system. (Alternatively, the Mobility fare is \$3.50 each way.) The **Half-Fare Office** number is (404) 848-5112.

Enclosed you will find **PART A** of the **APPLICATION FOR MARTA MOBILITY ELIGIBILITY**. You or your designee must complete all questions on **PART A** and you must sign it to certify that the information is complete and correct. Please be sure that **all** of the **signatures** required on the **Authorization** page have been **signed** by you or your designee. Please return your application in the enclosed envelope.

PART B of this application will be forwarded to your health care professional upon receipt of **PART A**, including the signed **Authorization** page. **PART B must be completed and signed** by your physician or other health care professional. Your or your health care professional's failure to return fully completed applications will delay processing. **MARTA must process a completed application (PART A and B) within 21 calendar days of receipt.**

If you have any questions, please call the MARTA Mobility Eligibility Department at (404) 848-5389 (Voice) or -711 (Georgia Relay for Hearing Impaired).

Sincerely,

A handwritten signature in cursive script that reads "Rebecca R. Reumann".

Rebecca R. Reumann, M.A., M.S.
Mobility Eligibility Specialist

MARTA MOBILITY
APPLICATION FOR PARATRANSIT ELIGIBILITY

DEAR APPLICANT:

PLEASE READ BEFORE COMPLETING

The questions in **Part A** of this application represent the **first step** in the process to certify your application for eligibility to use MARTA Mobility Service (i.e., paratransit). Please answer every question, as each will assist MARTA in determining the appropriate service that matches your abilities.

It is your responsibility to return this first step of the Certification Process (PART A) to MARTA **completed and properly signed**. You must sign the **Authorization Page** of PART A. Your signature authorizes your Health Care Professional to release information about your disability. At the top of the Authorization Page, please **provide the name, address, and phone number of the Health Care Professional** who can appropriately answer questions about your disability and ability to travel. MARTA will forward Part B the same day Part A is received in our office.

Your application is complete once your Health Care Professional has completed and returned **PART B** to MARTA.

PART A--APPLICANT INFORMATION (PLEASE PRINT) DATE: _____

PLEASE CHECK ONE: INITIAL APPLICATION ☐ RE-CERTIFICATION APPLICATION ☐

NAME
LAST _____ FIRST _____ MI _____ TITLE _____

ADDRESS: _____
(# STREET) (APT #)

(CITY) (STATE) (ZIP) (COUNTY)

NAME OF SUBDIVISION OR APARTMENT COMPLEX: _____

NEAREST MAJOR INTERSECTING STREET: _____

NEAREST CROSS STREET TO YOUR RESIDENCE: _____

CELL PHONE #: _____ HOME PHONE #: _____ WORK PHONE #: _____
() () ()

FOR ID PURPOSES ONLY: SS # _____ / _____ / _____ DOB: _____ / _____ / _____
(OPTIONAL)

WHAT IS YOUR DISABILITY?

IS THIS CONDITION TEMPORARY? YES ☐ NO ☐ IF YES, HOW LONG DO YOU ANTICIPATE YOUR DISABILITY WILL AFFECT YOU?

HOW DOES THIS CONDITION AFFECT YOUR ABILITY TO RIDE REGULAR FIXED ROUTE BUS SERVICE?

HOW DOES THIS CONDITION AFFECT YOUR ABILITY TO RIDE THE TRAIN?

ARE THERE ANY OTHER PHYSICAL OR MENTAL DISABILITIES/CONDITIONS WHICH IMPACT YOUR FUNCTIONAL ABILITY TO RIDE MARTA'S REGULAR BUS OR RAIL SERVICES?

DO ANY OF THE FOLLOWING CONDITIONS AFFECT YOUR TRAVEL:

GOOD DAYS/BAD DAYS _____
HILLS _____
NO CURB CUT _____
NO SIDEWALK _____
WEATHER/TEMPERATURE SENSITIVITY _____

CAN YOU WAIT OUTSIDE FOR 10-15 MINUTES UNASSISTED? YES ☐ NO ☐
IF NO, EXPLAIN.

HOW FAR CAN YOU WALK WITHOUT THE ASSISTANCE OF ANOTHER PERSON?

_____ LESS THAN ONE CITY BLOCK?	200 FT.
_____ THE LENGTH OF ONE FOOTBALL FIELD?	300 FT.
_____ ONE LENGTH OF A FOOTBALL FIELD AND BACK?	600 FT.
_____ ONE LAP AROUND A TRACK?	+1200 FT.

DO YOU USE A MOBILITY DEVICE TO TRAVEL? PLEASE CHECK ALL THAT APPLY:

_____ WHITE CANE
_____ ORTHOPEDIC CANE (THREE OR FOUR PRONG BASE)
_____ WALKER
_____ BRACES
_____ CRUTCHES
_____ MANUAL WHEELCHAIR
_____ MOTORIZED WHEELCHAIR
_____ SCOOTER

IS YOUR SCOOTER/WHEELCHAIR OF STANDARD PROPORTIONS? YES ☐ NO ☐
IF LARGER, PLEASE SPECIFY.

DO YOU USE A SERVICE ANIMAL? YES ☐ NO ☐ IF YES, WHAT TYPE OF ANIMAL
AND FOR WHAT PURPOSE WAS THE ANIMAL TRAINED?

DO YOU TRAVEL WITH PORTABLE MEDICAL EQUIPMENT? YES ☐ NO ☐
WHAT TYPE OF EQUIPMENT?

DO YOU REQUIRE SOMEONE TO TRAVEL WITH YOU TO PROVIDE PERSONAL
TRANSPORTATION ASSISTANCE? YES ☐ NO ☐ SOMETIMES ☐

IF YES OR SOMETIMES, PLEASE TELL US ABOUT THE SPECIFIC ASSISTANCE YOU
REQUIRE.

ARE THERE SITUATIONS WHEN YOU WILL NOT REQUIRE THIS TYPE OF
ASSISTANCE? EXPLAIN.

ARE YOU ABLE TO WALK UP 12-14 INCH STEPS UNASSISTED? YES ☐ NO ☐

CAN YOU GRIP A HANDRAIL TO SUPPORT YOURSELF? YES ☐ NO ☐

HOW DO YOU TRAVEL NOW? HOW DID YOU GET HERE TODAY?
PLEASE CHECK ALL THAT APPLY:

_____ WALK
_____ DRIVE MYSELF
_____ PASSENGER IN SOMEONE ELSE'S CAR
_____ MARTA'S REGULAR BUS SERVICE
_____ TRAIN
_____ OTHER VAN SERVICE WHICH ONE: _____

WHEN WAS THE LAST TIME YOU RODE A MARTA BUS?

WHY DID YOU STOP?

WHEN WAS THE LAST TIME YOU RODE ON THE TRAIN?

WHY DID YOU STOP?

HAVE YOU EVER BEEN TRAINED IN THE USE OF MARTA'S BUS AND RAIL SYSTEM?
YES ☐ NO ☐ WHERE? _____

DO YOU FEEL THAT YOU COULD RIDE THE TRAIN OR BUS IF THE VAN COULD GET
YOU THERE AND PICK YOU UP FROM THERE? _____

NAME AND ADDRESS OF HEALTH CARE PROFESSIONAL WHO WILL CERTIFY APPLICATION:

PHONE # () FAX # ()

TO THE BEST OF MY KNOWLEDGE, THE INFORMATION I HAVE PROVIDED IN PART A OF THIS APPLICATION HAS BEEN PROPERLY RECORDED. I HAVE REVIEWED ALL ANSWERS AND CERTIFY THAT THE INFORMATION IS COMPLETE AND CORRECT. I UNDERSTAND THAT ANY INTENTIONAL FALSE OR MISLEADING INFORMATION MAY BE GROUNDS FOR DENIAL OF SERVICE.

SIGNATURE OF APPLICANT DATE / /
REPRESENTATIVE OR LEGAL GUARDIAN

IN CASE OF EMERGENCY CONTACT (IF POSSIBLE, ALTERNATIVE NUMBER, THAN YOUR HOME PHONE):

NAME

PHONE # () CELL # ()

IF THIS APPLICATION HAS BEEN COMPLETED BY SOMEONE OTHER THAN THE APPLICANT, THAT PERSON MUST COMPLETE THE FOLLOWING:

NAME

RELATIONSHIP

ADDRESS

HOME PHONE WORK TDD/TTY

I CERTIFY, TO THE BEST OF MY KNOWLEDGE, THAT THE INFORMATION PROVIDED IN THIS APPLICATION IS COMPLETE AND CORRECT BASED UPON THE INFORMATION GIVEN ME BY THE APPLICANT OR MY OWN KNOWLEDGE OF THE APPLICANT'S HEALTH CONDITION OR DISABILITY.

SIGNATURE DATE / /

AUTHORIZATION BY APPLICANT TO RELEASE MEDICAL INFORMATION:

I, THE UNDERSIGNED, DO HEREBY CONSENT VIA SIGNATURE OF THIS AUTHORIZATION, THE RELEASE OF MEDICAL INFORMATION TO MARTA PARATRANSIT SERVICES FOR THE SOLE PURPOSE OF DETERMINING ADA PARATRANSIT ELIGIBILITY. I UNDERSTAND THAT THIS INFORMATION WILL BE SHARED ONLY WITH OTHER TRANSIT PROVIDERS TO FACILITATE TRAVEL IN THOSE AREAS.

SIGNATURE OF APPLICANT DATE / /

REPRESENTATIVE OR LEGAL GUARDIAN

SIGNATURE OF PERSON COMPLETING APPLICATION



2424 Piedmont Rd. N.E.
Atlanta, GA 30324-3330

FAX

☒ Urgent

☐ For Review

☒ Please Reply

Date: / /

To:

Phone/Fax:

From: Becky Reumann *Becky Reumann*

Phone/Fax: 404-848-5789/4-848-6900

Re: MARTA Mobility Eligibility Application No. of Pages: 5

Comments: FAX Confidential: If this fax was sent to you in error, please call or return to MARTA Mobility. Otherwise, please complete and fax back to us ASAP—within 3 business days. Thank you!

FOR:

SSN:

DOB:

PLEASE COMPLETE AND FAX BACK ASAP, WITHIN 3 BUSINESS DAYS. THANK YOU!!



2424 Piedmont Rd. N.E.
Atlanta, GA 30324-3330
404-848-5000

Dear Health Care Professional:

The Americans with Disabilities Act (ADA) of 1990 is a civil rights bill which prohibits discrimination against persons with disabilities. In accordance, MARTA is required to provide comparable (paratransit) transportation for individuals who, because of their disability, cannot travel by fixed route (bus or rail) service. MARTA's regular bus and rail service is wheelchair accessible and operators make the required ADA announcements to assist the visually impaired. The entire system is 100% accessible, adhering to all aspects of ADA compliance. Many disabled individuals use our system daily; however, a percentage of patrons cannot travel on regular buses or the rail system. Individual categories applying to these patrons are described below.

One of your clients has requested certification for use of MARTA Mobility Services. Your assistance is required for evaluating and properly determining the applicant's ability or inability to use MARTA's regular bus and/or rail service. Please complete the attached Health Care Professional Certification (Part B) of the Application for MARTA Mobility Services and fax your reply to MARTA.

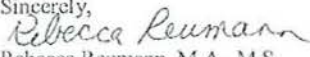
The law specifically defines the conditions of eligibility for paratransit (MARTA Mobility) transportation. We hope that the descriptions below will aid your understanding of the eligibility criteria. The three categories of eligibility are defined as follows:

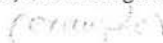
Category 1: Individuals with disabilities who cannot board, ride or disembark from an accessible vehicle (e.g., people who, because of a visual or cognitive impairment, could never "navigate the system"). These individuals are usually paratransit dependent for life.

Category 2: Individuals with disabilities who can use an accessible vehicle (bus or rail) but an accessible vehicle is not available. These individuals are usually transitional users until the system becomes 100% accessible.

Category 3: Individuals with disabilities who have specific impairment related conditions which prevent them from getting to and from a bus stop. A combination of a disability and environmental barriers (such as a blind person who cannot cross an eight lane highway or a wheelchair user who cannot go up a steep hill or push through heavy snow) may prevent a person from getting to and from a stop. The existence of a barrier alone, however, does not confer eligibility. Inconvenience and decreased comfort are not a basis for qualification. The condition must prevent the travel.

Should you need additional information or explanation, please call our Eligibility and Certification Specialist for assistance at (404) 848-5389. Please fax your reply to us within three (3) days. We appreciate your timely response to this request as the ADA law requires a twenty one (21) day turnaround on application processing.

Sincerely,

Rebecca Reumann, M.A., M.S.
Mobility Eligibility Specialist

If any questions, please contact me, Gloria Singleton, at
(404) 848-5789. Thank you!! 

PART B
HEALTH CARE PROFESSIONAL CERTIFICATION
FOR MARTA MOBILITY ELIGIBILITY

THIS PORTION MUST BE COMPLETED BY ONE OF THE FOLLOWING CURRENTLY LICENSED PROFESSIONALS:

Physician, registered nurse, social worker, psychologist, physical therapist, chiropractor, occupational therapist, speech pathologist, special education teacher, nurse practitioner, physician's assistant, mental health counselor, orientation/mobility specialist, respiratory therapist, vocational rehabilitation counselor, or recreation therapist employed by a medical facility.

NAME OF APPLICANT _____

CAPACITY IN WHICH YOU KNOW THE APPLICANT:

DATE OF APPLICANT'S LAST VISIT:

MEDICAL DIAGNOSIS OF DISABILITY:

PLEASE DISCUSS THE IMPACT THIS DISABILITY HAS ON THE APPLICANT'S ABILITY TO FUNCTION:

IS DISABILITY/CONDITION PERMANENT? YES ☐ NO ☐

IF TEMPORARY, WHEN WILL PATRON BE ABLE TO RESUME NORMAL TRAVEL PATTERNS?
DATE: / /

IS DISABILITY/CONDITION PERIODIC? YES ☐ NO ☐

UNDER WHAT CIRCUMSTANCES DOES DISABILITY/CONDITION FLARE-UP?

DOES THE APPLICANT HAVE THE MENTAL CAPACITY, VISUAL AND OR HEARING ABILITY TO:

GIVE ADDRESSES AND PHONE NUMBERS?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
RECOGNIZE A DESTINATION OR LANDMARK?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
DEAL WITH UNEXPECTED CHANGE IN ROUTINE?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
ASK FOR, UNDERSTAND AND FOLLOW DIRECTIONS?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
SAFELY/EFFECTIVELY TRAVEL THROUGH CROWDED/COMPLEX FACILITIES?	YES <input type="checkbox"/>	NO <input type="checkbox"/>

ARE THERE ANY OTHER MEDICAL CONDITIONS OF WHICH MARTA SHOULD BE AWARE? IF YES, EXPLAIN

PART B
HEALTH CARE PROFESSIONAL CERTIFICATION
FOR MARTA MOBILITY ELIGIBILITY

HOW FAR CAN THE APPLICANT WALK WITHOUT ASSISTANCE? PLEASE CHECK.

_____	LESS THAN ONE CITY BLOCK?	200FT.
_____	THE LENGTH OF ONE FOOTBALL FIELD?	300FT.
_____	ONE LENGTH OF A FOOTBALL FIELD AND BACK?	600FT.
_____	ONE LAP AROUND A TRACK?	+1200FT.

CAN THE APPLICANT WALK UP 12-14 INCH STEPS WITHOUT ASSISTANCE YES ☐ NO ☐

CAN APPLICANT GRIP A HANDRAIL? YES ☐ NO ☐

DOES THE APPLICANT USE A MOBILITY DEVICE? PLEASE CHECK ALL THAT APPLY

_____ WHITE CANE
_____ SUPPORT CANE
_____ ORTHOPEDIC CANE (3 OR 4 PRONG)
_____ WALKER
_____ BRACES
_____ CRUTCHES
_____ MANUAL WHEELCHAIR
_____ MOTORIZED WHEELCHAIR
_____ SCOOTER

DOES THE APPLICANT'S DISABILITY PREVENT THE APPLICANT FROM RIDING THE RAIL SYSTEM?

YES ☐ NO ☐ IF YES, EXPLAIN.

DOES THE APPLICANT'S DISABILITY PREVENT THE APPLICANT FROM RIDING THE REGULAR ACCESSIBLE BUS? YES ☐ NO ☐ IF YES, EXPLAIN.

DOES WEATHER IMPACT APPLICANTS ABILITY TO TRAVEL? YES ☐ NO ☐
PLEASE EXPLAIN WEATHER CONDITIONS AND EFFECTS?

DOES APPLICANT REQUIRE A PERSONAL CARE ATTENDANT? YES ☐ NO ☐

THIS CERTIFICATION HAS BEEN COMPLETED BY:

PRINT NAME OF CERTIFYING PROFESSIONAL: _____

NAME OF FACILITY/AGENCY _____

ADDRESS _____ SUITE _____

CITY _____ STATE _____ ZIP _____

OFFICE PHONE NUMBER _____ FAX _____

SIGNATURE _____ CERT. _____ DATE / /

Attachment D
Sample Conditional Eligibility Letter

marta
2424 Piedmont Rd. N.E.
Atlanta, GA 30324-3330
404-848-5000

SUBJECT: APPROVAL OF APPLICATION FOR MARTA MOBILITY ELIGIBILITY

Dear Customer:

Your application for MARTA Mobility service has been approved on a **CONDITIONAL** basis for two years, through _____ The conditions of your eligibility are as follows:

- If fixed-route service inaccessible or Distances greater than 200 feet (1/2 block), feeder svc.
- To/From chemotherapy or radiation treatments, curb-to-curb service

If you do not agree with this decision, you have the right to an appeal. Appeals must be filed, in writing, within 60 days of this letter and submitted to:

Appeals Panel
MARTA Mobility Services
2424 Piedmont Road, N.E.
Atlanta, GA 30324-3330

Upon receipt of your letter of appeal, MARTA will notify you of the location and time of the appeals hearing. You will have the opportunity to be represented at the hearing and may present information and arguments at that time.

As part of our MARTA Mobility program, all Customers approved for the service are **required** to have a **Photo Identification Card**. This card must be presented when using MARTA Mobility.

MARTA Mobility Photo ID Cards will be issued at MARTA Half-Fare Card offices: **

- 1) MARTA Five-Points Station, accessible by MARTA bus and train, Ph: 404-848-3203 or
- 2) MARTA Lindbergh Station, 1st floor, Headquarters Bldg, 2424 Piedmont Ave NE, accessible by MARTA bus, train and parking available. Ph: 404-848-5112.

Cards may be obtained Monday through Friday between the hours of 9:00 AM and 4:00 PM. Your MARTA Mobility Service **cannot** begin until you have acquired your photo ID. However, you will be permitted to use the Mobility service to obtain your ID card at a discounted rate of \$3.50, to be paid **in exact change** on the return trip. Please keep this letter and present it when you come to obtain your photo ID.

Upon your arrival at our facility, we will give you a **MARTA Mobility Customer's Guide** to inform you about how to use our service. Reservation calls for service are currently accepted between the hours of 8:30 AM and 5:00 PM, Monday through Friday. Reservations may be made up to 7 days in advance and must be made at least the day before your desired trip. **To make a reservation, please call MARTA Mobility Reservations at (404) 848-5826.** On Saturdays and Sundays, you may leave a message between 10:00 AM and 4:00 PM to book or cancel NEXT DAY reservations only.

If you have any questions, please call MARTA Mobility Eligibility Department at (404) 848-5389 (Voice) or -711 (Georgia Relay for Hearing Impaired). We appreciate your patronage and support.

Sincerely,
Rebecca R. Reumann
Rebecca R. Reumann, M.A., M.S.
Mobility Eligibility Specialist

****PLEASE NOTE:** If you were previously issued a MARTA Half-Fare Card, please bring it with you to exchange for a MARTA Mobility Card. Thank you!

Attachment E
Reported Trip Denials
Fiscal Years 2007, 2008 and 2009

MARTA Mobility Trips and Denials

		Trips	Denials	Denial %
FY06	Dec-05	21976	53	0.24%
	Jan-06	23583	65	0.28%
	Feb-06	23031	81	0.35%
	Mar-06	27384	108	0.39%
	Apr-06	24152	99	0.41%
	May-06	26099	144	0.55%
FY07	Jun-06	25298	131	0.52%
	Jul-06	23,417	134	0.57%
	Aug-06	27,540	155	0.56%
	Sep-06	25,242	197	0.78%
	Oct-06	27,220	145	0.53%
	Nov-06	23,599	119	0.50%
	Dec-06	23,984	141	0.59%
	Jan-07	26,500	150	0.57%
	Feb-07	24,002	115	0.48%
	Mar-07	27,725	106	0.38%
	Apr-07	25,855	95	0.37%
	May-07	26,688	83	0.31%
FY08	Jun-07	26,830	176	0.66%
	Jul-07	26,068	13	0.05%
	Aug-07	28,575	70	0.24%
	Sep-07	25,966	26	0.10%
	Oct-07	28,760	59	0.21%
	Nov-07	27,584	54	0.20%
	Dec-07	25,673	96	0.37%
	Jan-08	30,878	63	0.20%
	Feb-08	28,781	93	0.32%
	Mar-08	30,296	42	0.14%
	Apr-08	31,513	32	0.10%
	May-08	32,003	33	0.10%
FY09	Jun-08	31,282	12	0.04%
	Jul-08	31,417	21	0.07%
	Aug-08	34,640	21	0.06%
	Sep-08	33,657	34	0.10%
	Oct-08	36,183	14	0.04%
	Nov-08	30,272	19	0.06%
	Dec-08	32,247	22	0.07%

TOT
Feb = 310, 210
0.52%

308,602 trips 1,616 denials

362,626

TOT
Feb = 347, 972
0.17%

347,379 trips 593 denials
(12.6% increase)

198,416 131 denials

(22% inc.)
over FY08

TOT
Feb = 198,547
0.07%

Attachment F
Driver Interview Form

ADA Complementary Paratransit Assessment

Site: _____

Date: _____

DRIVER INTERVIEW FORM

1. How long have you been a driver?
2. Did the training you received when you were first hired adequately prepare you for the job?
3. Since you were hired, have you received refresher training?
4. What is the most difficult part of the job?
5. How would you describe the schedules you are given? Too loose, too tight, about right?
6. What is your understanding of an "on-time pick-up?"
7. Do riders seem to understand the pick-up window? Are they ready when you arrive?
8. Do riders ever indicate that they were given a different pick-up time than what you have on your schedule? Is it sometimes very different (more than 15-20 minutes)?
9. Do you sometimes find it necessary to arrive early in order to stay on schedule? What do you do if you arrive early and the rider is not ready to go?

[REDACTED]

10. If riders do not board as scheduled, what do you do?

11. How often do you end up running late?

12. If you are running late, do you request dispatcher assistance? Do the dispatchers reassign trips when you are running late or do you just do the best you can? Are these trips reassigned in advance so that the next driver can still get there on time?

13. Do you provide assistance beyond the curb (e.g., to the door) if needed?

14. Are special instruction or other notes on the manifests accurate?

15. Are vehicles in good repair? When you report a problem, is it fixed?

16. Are there any other issues I have not asked about?

Interviewer: _____

Attachment G
“Paratransit Daily Operator Complement” Data,
January 24 –January 30, 2009

PARATRANSIT DAILY OPERATOR COMPLIMENT

WEEK ENDING 1-30-09 SAT 24 SUN 25 MON 26 TUE 27 WED 28 THUR 29 FRI 30 Total LAST WEEK AT&A Total

Service Statistics:

Service Failures	0	0	0	0	0	0	0	0
Unscheduled Trips	0	0	0	0	0	0	0	0
Total Routes for the Day	77	79	196	221	214	223	212	1222
Total Revenue Hours Used	0	0	0	0	0	0	0	0
OTP%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

← Total
R-1

ETA Department:

Calls Offered	325	266	693	865	597	693	624	4063
Calls Answered	273	215	619	634	532	630	584	3487
Calls Abandoned	16	11	18	106	28	14	18	211
Percentage of Calls Abandoned	6.00%	5.00%	3.00%	17.00%	5.00%	2.00%	3.00%	6.00%

Equipment Failures:

Total MDT'S Inoperable	0	0	0	0	0	0	0	0
Total Breeze Machines Inoperable	0	0	0	0	0	0	0	0
Total Fare Boxes Inoperable	0	0	0	0	0	0	0	0

Operator Availability:

Full- Time Operators	177	177	177	177	177	177	177	177
Part- Time Operators	68	68	68	68	68	68	68	68
Full- Time Actually Working	158	158	158	158	158	158	158	1106
Part- Time Actually Working	61	61	61	61	61	61	61	427
Operators in Training	0	0	0	0	0	0	0	0
Total Regular Operators Scheduled to Work	81	72	177	177	181	182	190	1060

PARATRANSIT DAILY OPERATOR COMPLIMENT

WEEK ENDING 1-30-09 SAT 24 SUN 25 MON 26 TUE 27 WED 28 THUR 29 FRI 30 Total LAST WEEK AT&A Total

Scheduled Outs:

PTO(PO)	3	1	4	4	5	4	4	25
Swap								0
Holiday Birthdays	1							1
Holiday Anniversaries								0
Required Court (Personal/Jury Duty)			2					2

Unscheduled Outs:

PTU(PU)	9	9	11	11	13	10	13	76
HOLD			1	3	2	2	3	11
AWOL	2		1			1	1	5
FMLA	1	1	7	5	4	2	4	24
Military								0
Job Injury	5	5	6	5	6	5	5	37
Retraining								0
Suspended								0
Out-Of-Class								0
Funeral Leave								0
Leave of Absence								0
Light Duty/TEP/STD/LTD								0
Terminated/Resigned								0
Union/Marta Business				1				1
OPEN ROUTES (ROUTES STILL OPEN AFTER MARK-UP)	0	0	0	0	0	0	0	0
TOTAL ROUTES OPEN (PTO, PTU, FMLA, OJI)	21	16	32	29	30	24	30	182
AVAILABLE @ STRAIGHT TIME	60	56	145	148	151	158	160	878
EXTRA WORK OPERS. (Between 5.0 and 8.0 of hrs)	2 14	9	16	20	27	25	16	127
TOTAL OPERATORS AVAILABLE	74	65	161	168	178	183	176	1005
TOTAL # OF OPER. NEEDED TO COVER RTS.	1 17	23	51	73	63	65	52	344
SPECIAL SERVICE HOURS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EXTRAWORK HOURS	103.75	63.00	96.00	131.00	164.75	151.50	97.50	807.50
TOTAL OVERTIME HOURS THIS WEEK	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL OVERTIME HOURS LAST WEEK	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Operators Available
Additional operators needed

(A) Closed routes = Additional operators needed (#1) minus extra work operators available (#2)

(B) Closed routes = Total open routes (#3) minus Extra work operators available (#2)

Attachment H
Ridership, Vehicle Hour and Workforce Information
Used in FY 2009 Budget Process

non Ha 2/11

MOBILITY BUDGET DEVELOPMENT STATISTICS

Reg.

	FY06 Actual	FY07 Actual	FY08 Estimate	FY08 Actual	FY09 Budget
Revenue Hours	221,713	247,990	275,268	283,788	305,236
% Change		12%	11%	14%	8%
Trips*	289,258	312,311	343,848	346,520	381,546
% Change		8%	10%	11%	10%
Direct Net Operating Expenses	\$8,997,298	\$11,480,641	\$11,813,547	\$12,310,644	\$12,355,769
% Change		28%	3%	7%	0%
<u>Head Count</u>					
Full Time	127	171	----	171	171
Part Time	48	48	----	48	63
Total FTES	163	207	----	207	218
% Change		27%	----	0%	5%
<u>Analytics</u>					
Direct cost/hour	40.58	46.29	42.92	43.38	40.48
% Change		14%	-7%	-6%	-7%
Direct cost/trip	31.10	36.76	34.36	35.53	32.38
% Change		18%	-7%	-3%	-9%

offered w/ slight prod. imp 1.3 → 1.25
slight OTR imp.

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Cozi Reeves
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Productivity: FY06 - 1.30
FY07 - 1.26
FY08 - 1.22
FY09 est. -

Also, please go to feeding but not implemented.
Decision due in cell
Attendance?

Attachment I
ADA Complementary Paratransit Demand Estimate

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

Input Values	
ADA service area population (2000 Census)	1,650,000
Base fare for ADA paratransit (Dollars)	\$3.50
Percent of applicants for ADA paratransit eligibility found conditionally eligible	50.0
Conditional trip screening	0
Percent of the population in the ADA service area in households with 1999-2000 income below the poverty line	9.4
Effective on-time window for ADA paratransit (minutes)	30

Results	
Predicted Annual Ridership per Capita	0.28
Predicted Annual Ridership	460,693

Confidence Intervals for Mean Value for Systems with the Characteristics Entered

	Trips per Capita	Annual Ridership
Upper 95% confidence limit	0.51	846,502
Upper 90% confidence limit	0.46	762,395
Lower 90% confidence limit	0.17	278,383
Lower 95% confidence limit	0.15	250,723