

**Massachusetts Bay Transportation Authority (MBTA)  
Boston, Massachusetts**

**ADA Complementary Paratransit Service  
Compliance Review**

**July 19–27, 2010  
Summary of Observations**

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

**Prepared by  
Planners Collaborative, Inc.  
With  
TranSystems Corporation**

**Final Report: March 7, 2012**

# CONTENTS

<b>1</b>	<b>Purpose of the Review .....</b>	<b>1</b>
<b>2</b>	<b>Overview.....</b>	<b>3</b>
2.1	Pre-Review.....	3
2.2	On-Site Review.....	4
<b>3</b>	<b>Background .....</b>	<b>7</b>
3.1	Description of Fixed Route Service .....	7
3.2	Description of ADA Complementary Paratransit Service .....	7
3.3	ADA Complementary Paratransit Performance Policies and Standards .....	8
3.4	Consumer Input .....	9
<b>4</b>	<b>Summary of Findings .....</b>	<b>10</b>
4.1	ADA Complementary Paratransit Service Criteria .....	10
4.2	ADA Complementary Paratransit Eligibility Process .....	11
4.3	Telephone Access .....	13
4.4	Service Performance .....	14
<b>5</b>	<b>ADA Complementary Paratransit Service Criteria .....</b>	<b>15</b>
5.1	Consumer Comments .....	15
5.2	Type of Service .....	15
5.3	Service Area .....	15
5.4	Days and Hours of Service.....	17
5.5	Fares.....	18
5.6	Trip Purpose .....	19
5.7	Coordination with Adjacent Service Providers .....	19
5.8	Complaint-Handling Process.....	20
5.9	Findings.....	22
5.10	Recommendations .....	24
<b>6</b>	<b>ADA Complementary Paratransit Eligibility.....</b>	<b>25</b>
6.1	Consumer Comments .....	25
6.2	Eligibility Determination Procedures and Practices.....	25
6.3	Reported Determination Outcomes.....	29
6.4	Process Observations and Reviews of Recent Determinations .....	30
6.5	No-Show Suspension Policy .....	33
6.6	Findings.....	33
6.7	Recommendations .....	35
<b>7</b>	<b>Telephone Access .....</b>	<b>37</b>
7.1	Consumer Comments .....	37
7.2	Phone System Standards and Performance Monitoring .....	37
7.3	Phone System Design .....	37
7.4	Reservations and Dispatch Staffing .....	40
7.5	Observations of the Call-Handling Process .....	40
7.6	Telephone Performance Reports .....	41
7.7	Findings.....	41
7.8	Recommendations .....	42

<b>8</b>	<b>Reservations.....</b>	<b>43</b>
8.1	Consumer Comments .....	43
8.2	Standards, Policies and Procedures .....	43
8.3	Service Reports .....	44
8.4	Observations of the Handling of Trip Requests.....	45
8.5	Trip Confirmations .....	47
8.6	Recommendations .....	48
<b>9</b>	<b>Service Performance .....</b>	<b>49</b>
9.1	Consumer Comments .....	49
9.2	Service Standards and Policies.....	49
9.3	Scheduling and Dispatching Procedures and Observations .....	50
9.4	Driver Interviews .....	63
9.5	On-Time Performance .....	65
9.6	No-Show and Missed-Trip Coding.....	66
9.7	Analysis of On-Board Travel Times .....	67
9.8	Findings.....	75
9.9	Recommendations .....	75
<b>10</b>	<b>Resources.....</b>	<b>76</b>
10.1	Consumer Comments .....	76
10.2	Vehicle Fleet and Availability.....	76
10.3	Driver Availability, Training, and Turnover.....	76
10.4	Staffing.....	76
10.5	Run Coverage .....	77
10.6	Other Resources.....	78
10.7	Planning, Budgeting, and Funding .....	79
10.8	Ridership .....	80
10.9	Recommendations .....	81

## ATTACHMENTS

Attachment A	MBTA Response to Draft Report (Final Report only)
Attachment B	FTA Review Notification Letter
Attachment C	On-Site Review Schedule
Attachment D	ADA Paratransit Eligibility Application
Attachment E	Sample Eligibility Determination Letters (Prior and Revised)
Attachment F	Discussion of Incomplete Applications
Attachment G	Sample Telephone Performance Reports
Attachment H	Driver Interview Form
Attachment I	ADA Complementary Paratransit Demand Estimate

# 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 required that ADA complementary paratransit services meet these criteria by January 26, 1997.

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the ADA and the DOT regulations implementing the ADA. As part of its compliance efforts, FTA, through its Office of Civil Rights, conducts periodic reviews of fixed route transit and ADA complementary paratransit services operated by Federal grantees.

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

FTA conducted a review of ADA complementary paratransit service provided by the Massachusetts Bay Transportation Authority (MBTA) of Boston, Massachusetts, from July 19-27, 2010. Planners Collaborative, Inc. and TranSystems Corporation, both located in Boston, Massachusetts, conducted the review for the FTA Office of Civil Rights. The review focused primarily on compliance of the MBTA's ADA complementary paratransit service, THE RIDE, with the requirement in Section 37.131(f) of the DOT ADA regulations that this service be operated without capacity constraints.

The review also examined compliance of THE RIDE related to eligibility determinations, rider-assistance policies, service area, response time, fares, trip purposes, days and hours of service, and coordination with other ADA complementary paratransit services in the area. Sections 37.123 through 37.127 of the DOT ADA regulations require that a process be established for determining who is ADA paratransit eligible and that determinations of eligibility be made consistent with regulatory criteria. Section 37.131(a) requires that ADA complementary paratransit service be origin-to-destination service. Section 37.131(a) requires that ADA complementary paratransit service be provided in all geographic areas where non-commuter fixed route service is provided. Section 37.131(b) requires that "next-day" service be provided. Section 37.131(c) requires that ADA complementary paratransit fares be no more than twice the full fixed route fare. Section 37.131(d) requires that ADA complementary paratransit service be

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

This report summarizes the observations and findings of the on-site review of THE RIDE. Chapter 2 explains the approach and methodology used to conduct the review. Chapter 3 then describes key features of the MBTA transit system. Chapter 4 provides a summary of the findings that are also presented at the end of the remaining chapters. Chapter 5 includes observations and findings related to rider-assistance policies, service area, fares, trip purposes, days and hours of service, and coordination with other public transit entities. Chapter 6 presents observations and findings related to the eligibility-determination process. Observations and findings related to the capacity constraint criteria, as well as additional observations on response time, are presented in Chapters 7 through 10.10 (Resources). Recommendations for addressing some of the findings are also provided.

## 2 Overview

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

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

The 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
- Coordination with other ADA complementary paratransit services in the area
- ADA complementary paratransit service eligibility process
- Telephone capacity

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

### 2.1 Pre-Review

A notification from the FTA Office of Civil Rights was sent to MBTA’s former General Manager, Richard Davey, on May 28, 2010, requesting dates for the review and information that the review team needed that should be sent in advance. The notification letter is provided in Attachment B.

Based on the information received from the MBTA, the review team examined key service information prior to the on-site review. This information included:

- A description of how THE RIDE is structured
- Public information describing THE RIDE
- The MBTA’s standards for on-time performance, trip denials, travel times, and telephone service, which are specified within the contract documents with the operators of THE RIDE

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

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

In addition, the review team contacted several riders, disability advocates, and disability agency staff to get input on their recent experiences with THE RIDE.

## 2.2 On-Site Review

An on-site review of THE RIDE service took place from July 19–27, 2010. The review began with an opening conference, held at 9 a.m. on Monday July 19, 2010, at the MBTA's offices at 10 Park Plaza, Boston, MA. The following attended the meeting:

Richard Davey	MBTA (former) General Manager
Melissa Dullea	MBTA, Director of Planning and Schedules
Carol Joyce-Harrington	MBTA, Office of Transportation Access, Assistant Manager - Administration
John Lewis	MBTA, Chief Operating Officer
Frank Oglesby	MBTA, Deputy Director of Customer Services for Operations
Paul Strobis	MBTA, Office of Transportation Access, Assistant Manager - Operations
Dorothy Winn	MBTA, Office of Transportation Access, Paratransit Coordinator
Peggy Griffin	FTA Civil Rights Officer, Region 1
Susan Clark	FTA Office of Civil Rights (by phone)
Theresa Sullivan	FTA Office of Civil Rights (by phone)
David Chia	Planners Collaborative, Review Team Leader
Jim Purdy	Planners Collaborative
John Hersey	Planners Collaborative
Russell Thatcher	TranSystems

Ms. Clark opened the meeting by thanking the MBTA for opening its office and operations to the review. She stressed that the review team would make every effort to complete the review with a minimal level of disruption to the MBTA's operation. She also invited MBTA staff to contact her directly should they have any questions or concerns about the review. Ms. Clark noted that the main purpose of the review was to ensure compliance with requirements of the ADA. She noted that the review team had significant experience with ADA complementary paratransit operations and encouraged the MBTA to utilize the review team for technical assistance.

Ms. Clark noted that FTA sees the compliance review not just as a way to assess the MBTA's operation of services, but as an opportunity to determine if the MBTA has the resources and assistance it needs. She noted that the review team would present preliminary findings at a

closing meeting and give the MBTA an opportunity to respond on Tuesday July 27, 2010. She encouraged the MBTA to ask questions about the preliminary findings as well as what approaches are possible for addressing any issues that might be identified.

David Chia of Planners Collaborative then presented the schedule for the on-site review, including the parts of the operation that would be observed each day. Attachment C presents a copy of the review schedule.

Following the opening conference, the review team met with MBTA staff to discuss the information sent in advance as well as additional material and information that was available on site. For the remainder of the day on Monday, the review team discussed the process in place at the MBTA to record and respond to consumer input and concerns and requested copies of comments and complaints from recent months. The review team discussed the eligibility process with MBTA staff and reviewed eligibility files. For the remainder of the week, the review team met with each of the three contractors that operate THE RIDE.

The three contractors, their office locations, and service characteristics are:

- Northwest: Veterans Transportation Services (VTS) – Waltham, MA (19 municipalities, 716,000 residents, 209 square miles)
- North: Greater Lynn Senior Services (GLSS) – Lynn, MA (22 municipalities, 629,000 residents, 243 square miles)
- South: Joint Venture (JV) – Boston, MA (19 municipalities, 482,000 residents, 329 square miles)

On Tuesday, the review team began its peak-hour observations of trip reservations, scheduling, and dispatching at VTS. The review team met with the scheduler to discuss procedures used to develop the final driver manifests, examined driver manifests as a part of on-time performance verification, and interviewed drivers. Review of eligibility files and interviews with MBTA staff on the eligibility determination process continued.

On Wednesday, review team members reviewed data gathered on Tuesday. Russell Thatcher analyzed eligibility criteria, while Jim Purdy and David Chia interviewed MBTA staff to follow up on data received at VTS the previous day.

On Thursday, Jim Purdy and Russell Thatcher observed operations at the GLSS offices, and David Chia and John Hersey conducting a similar review at the JV offices. Team members at both locations performed a similar review as that conducted at the VTS offices earlier in the week.

The review team used Wednesday, Friday, and the following Monday to complete additional tasks and prepared for the exit conference.

The exit conference took place on Tuesday July 27, 2010, at 2 p.m. at the MBTA office.

Attending the conference were:

Melissa Dullea	MBTA, Director of Planning and Schedules
Carol Joyce-Harrington	MBTA, Office of Transportation Access, Assistant Manager - Administration
John Lewis	MBTA, Chief Operating Officer
Frank Oglesby	MBTA, Deputy Director of Customer Services for Operations

---

Paul Strobis	MBTA, Office of Transportation Access, Assistant Manager - Operations
Dorothy Winn	MBTA, Office of Transportation Access, Paratransit Coordinator
Karen Charles	MBTA, Chief of Staff
Scott Darling	MBTA, Deputy Chief of Staff
Catherine Lynds	MBTA
Peggy Griffin	FTA Civil Rights Officer, Region 1
Theresa Sullivan	FTA Office of Civil Rights (by phone)
David Chia	Planners Collaborative
Jim Purdy	Planners Collaborative
John Hersey	Planners Collaborative
Russell Thatcher	TransSystems

Ms. Griffin led the meeting and reviewed the goals of the review—to assess compliance and also to provide technical assistance on ADA complementary paratransit services. She noted that a report would be drafted and provided to the MBTA for review and comment. Once the draft is transmitted to the MBTA, the report would be subject to release in response to Freedom of Information Act (FOIA) requests. MBTA’s comments on the draft will then be incorporated into a final report, and the final report will be posted on FTA’s website.

Ms. Griffin advised that the MBTA would be required to respond to the findings presented in the draft report. Recommendations, which do not require a response, will be offered as suggestions for addressing the findings and the MBTA may consider the recommendations in developing responses to the findings.

Those findings that require corrective action will be presented in a reporting table for the MBTA to use in reporting proposed corrective actions and a timetable for making required changes. The MBTA will then prepare quarterly progress reports for FTA review until it addresses all findings.

Ms. Griffin encouraged the MBTA to begin addressing findings noted during the on-site review while it awaited the draft and final reports. She also invited MBTA staff to contact FTA or the review team for technical assistance over the next several months if they decided to move ahead with corrective actions.

The review team members also thanked the MBTA and its contractors 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, manpower, and financial resources)

## 3 Background

### 3.1 Description of Fixed Route Service

The Massachusetts Bay Transportation Authority (MBTA) serves approximately 1.24 million passengers per day throughout the Boston region and is currently the fifth largest mass transit system in the United States as measured by ridership. Known as “The T,” the MBTA and its contractors operate bus, subway, commuter rail, and ferry service in the region. Table 3.1 summarizes the fixed route services. The service area includes the City of Boston and, with its commuter rail service included, serves 174 other municipalities covering 3,244 square miles. The fixed route service covers 60 municipalities. The MBTA’s ADA complementary paratransit service is known as THE RIDE. According to the 2000 U.S. Census, 4,667,555 people live in the MBTA service area (the population of THE RIDE’s service area is smaller).

**Table 3.1 – Summary of MBTA Fixed Route Services<sup>1</sup>**

Service	Route Miles	Routes	Vehicles	Start	End	Base Fare
Rapid Rail	38	3	450	5:05 a.m.	1:05 a.m.	\$2
Light Rail	23	4	207	4:56 a.m.	12:52 a.m.	\$2
Trolley	3	1	10	5:05 a.m.	1:05 a.m.	\$2
Commuter Rail	655	13	490	4 a.m.	1:42 a.m.	\$1.70–8.25
Bus Service	761	186	1055	3:20 a.m.	1:46 a.m.	\$1.50
Bus Rapid Transit	20*	4	49	5:15 a.m.	1:13 a.m.	\$2
Ferry	40*	3	12	5:45 a.m.	11:05 p.m.	\$1.70–12

\* Estimate

The MBTA’s operating budget for FY 2011 of \$1.6 billion reflects a \$5.1 million decrease over FY 2010, primarily related to a debt restructuring required to preserve vital transportation services within a balanced budget. The budget comprises operating expenses of \$1.2 billion and debt service expenses of \$405 million.

### 3.2 Description of ADA Complementary Paratransit Service

Three contractors operate THE RIDE for the MBTA (VTS, GLSS, and JV). The MBTA’s Office of Transportation Access (OTA)<sup>2</sup> oversees THE RIDE contracts, determines eligibility, addresses complaints, and enforces system-wide policies. The contractors manage reservations, scheduling, and dispatching; hire, train, monitor and discipline drivers; and operate, maintain, and repair vehicles.

THE RIDE is a paratransit service that operates on a door-to-door basis, without regard to trip purpose, throughout a service area consisting of 60 cities and towns— including all communities served by MBTA bus, rapid rail, light rail, bus rapid transit, and trolley service – during generally the same hours and days as the fixed-route service. The fare is \$2. Rider may make reservations 1–14 days in advance from 8:30 a.m. to 5 p.m. every day of the year.

<sup>1</sup> FY 2011–2015 MBTA Capital Investment Program

<sup>2</sup> In this report, OTA is used to refer to the MBTA’s Office of Transportation Access. Findings always refer to the MBTA except when specifically referring to OTA staff.

There are three other fixed route transit systems with contiguous service areas. THE RIDE has arranged a transfer point for ADA complementary paratransit riders with each system, as described in Chapter 5. Riders are responsible for making reservations with each system's ADA complementary paratransit system for any trip that requires a transfer, and pay separate fares for each system.

### **3.3 ADA Complementary Paratransit Performance Policies and Standards**

The MBTA provided the review team with requested information detailing its ADA complementary paratransit performance policies and standards for THE RIDE. The review team collected additional information during the on-site review and in several follow-up e-mails and visits. Following is a summary of the ADA complementary paratransit performance standards established by the MBTA for trip denials, vehicle wait time and rider no-shows, missed trips, on-time performance, on-board travel times, and telephone service. Chapter 5 presents this information in more detail, including relevant findings and recommendations.

#### **Trip Denial Policies**

Section 37.131(b) of the regulations allows transit agencies to negotiate pickup times up to one hour before or after the time requested by riders. According to the MBTA's contract with operators of THE RIDE, "the Contractor shall comply with the requirements of ADA and shall notify the MBTA if capacity concerns arise and work with the Authority to effect corrective action." The contracts indicate that the MBTA identifies trip denial as one hour before or after the customer's requested departure time. The MBTA does not permit contractors to deny trips.

#### **Missed Trip Standard**

According to the contract, missed trips are defined as an arrival more than 30 minutes late at the pickup location or more than 10 minutes late at the drop-off location where the customer is not found or elects to cancel resulting in the trip not being made. Late or missed trips mutually agreed to by the MBTA and the contractor due to factors beyond the control of the contractor are not included in this calculation. The MBTA imposes a \$60 fine on the contractor for each missed trip and rewards contractors \$5,000 each month there are no late trips.

#### **On-Time Performance Standards**

Contracts indicate that vehicles should arrive between 5 minutes before and 15 minutes after the scheduled pickup time under normal operating conditions. The MBTA penalizes the contractor \$30 per occurrence and repeated failure to comply with this requirement may lead to termination of the contract.

#### **On-Board Travel Time Standard**

The MBTA requires its contractors provide at least 98 percent of trips in an hour or less. The monthly penalty for failing to meet this standard is \$10,000, stating:

No passenger is to be kept on board a vehicle for more than sixty (60) minutes, except for transfers (limit 60 minutes per area) unless the factors influencing ride time are beyond the control of the contractor, or if THE RIDE time on the most direct route would be in

excess of thirty (30) minutes, the actual ride time shall not exceed twice the time required on the most direct route. This standard may be relaxed at the direction of the MBTA.

In addition to on-board travel time, the MBTA requires its contractors to compare its schedules with the shortest fixed route travel itineraries (excluding commuter rail). The ride time standard is the fixed route travel time plus 20 minutes.

In FY 2010, none of the contractors exceeded the 2 percent threshold for long trips. Of all trips, GLSS reported 1.39 percent, JV reported 1.75 percent, and VTS reported 1.17 percent as being longer than one hour.

## **Telephone Service Standard**

According to the contract, on a monthly basis average hold times must be less than 2.5 minutes. No more than 5 percent of all calls may be on hold for more than 5 minutes. The MBTA imposes a \$10,000 fine on each contractor that fails to meet this standard each month.

## **3.4 Consumer Input**

### **FTA Complaints and Recent Service Issues**

At the time of the review, FTA did not have any formal complaints on file.

### **Consumer Input**

Prior to and during the on-site review, the review team interviews registered riders of THE RIDE by asking for input on various aspects of the service, including:

- Eligibility-determination process
- Telephone hold times, trip denials, and getting trips scheduled at desired times
- On-time performance
- On-board travel times
- Driver assistance and professionalism
- Vehicle condition

Review team members also asked for any other input on the service not covered by the specific questions. Please refer to Chapters 5 to 9 for summaries of the consumer input related to the service issues covered in each chapter.

### **Rider Comments on File at the MBTA**

Chapter 5 describes MBTA procedures for receiving and responding to consumer input and complaints.

## 4 Summary of Findings

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

### 4.1 ADA Complementary Paratransit Service Criteria

1. Section 37.131(a)(1) of the DOT ADA regulations requires transit systems operating fixed route bus service to provide ADA complementary paratransit service that covers, at a minimum, all areas within 3/4-mile of all of its bus routes. The last stop of the MBTA's contracted bus route (#716) is within 1/4-mile of the Town of Stoughton, which THE RIDE does not service. At a minimum, the MBTA must provide RIDE service in Stoughton within 3/4-mile of MBTA's Route #716.
2. THE RIDE service hours do not cover as broad a span of hours as the fixed route service, and this is not compliant with Section 37.131(e) of the DOT ADA regulations. The MBTA must ensure that THE RIDE service is available during the same hours that comparable fixed route service is available.
  - a. THE RIDE provides ADA complementary paratransit service 365 days a year, generally from 5 a.m. to 1 a.m. The MBTA has a number of fixed routes that begin service before 5 a.m. and end service after 1 a.m. on weekdays. On weekdays, the earliest MBTA bus leaves Mattapan Station in Boston at 3:20 a.m., while the latest bus ends service at 1:46 a.m. in Lynn.
  - b. Riders who want to travel in Avon and Brockton must transfer to Brockton Area Transit Authority's "dial-a-bat" paratransit service. MBTA bus routes 230 and 240, which travel into these municipalities, both begin service earlier than *dial-a-bat* and both end service later than *dial-a-bat*. As a result, RIDE riders who want to travel within 3/4-mile of either MBTA bus Routes 230 or 240 are not able to receive early morning or evening service, even though fixed route service is available.
3. Section 37.131(c) of the DOT ADA regulations requires that ADA complementary paratransit fares be no more than double the non-discounted fixed route fare for a comparable fixed route trip. The MBTA's cash fare for fixed route bus service is \$1.50 and the fare for subway service is \$2. The RIDE fare is \$2, which complies with DOT ADA regulations. However, in the case of a RIDE rider who travels between the RIDE service area and Brockton or Avon, the total one-way fare is \$4 (*dial-a-bat* fare is \$2). If the destination in Brockton or Avon is within 3/4-mile of MBTA bus Route 230 or Route 240, and the comparable fixed route trip would require riding only one bus, then the fixed route fare would be \$1.50. For such RIDE trips, the fare is more than double the fare of the comparable fixed route trip and therefore is not in compliance with the regulations.
4. Under DOT ADA regulations at Section 37.131(b), transit providers must provide next-day response time for eligible riders. According to *THE RIDE Guide*, fares for The RIDE can

only be paid via prepaid customer account. The processing time to add funds ranges from five business days for U.S. mail, to two business days for accounts processed by phone or online, to one hour or less at the Back Bay Station sales location. This lead time, together with the need to establish a prepaid account prior to reserving a trip, compromises the MBTA's ability to meet the next-day response time for eligible riders as required under Section 37.131(b) of DOT ADA regulations. The only means by which an eligible rider would be able to establish the necessary prepaid account and reserve a trip for the next day would be to travel to the Back Bay Station sales location. However, the Back Bay Station is only open on weekdays, and riders may not be able to reach the Back Bay Station without first reserving a paratransit trip. In contrast, multiple fare-payment options (including cash) are available to MBTA fixed-route passengers, and passengers using the "CharlieCard" are able to add funds instantly at any station. This operational practice may violate DOT ADA regulations at Section 37.131(f)(3), which prohibits transit systems from engaging in any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons.

5. *THE RIDE Guide* states that eligible passengers must maintain a minimum balance of \$12 in their prepaid accounts in order to reserve a trip. In contrast, there is no requirement that fixed-route passengers carry a minimum of \$12 in their pockets in order to ride the bus. The minimum balance requirement may be inconsistent with the general requirement that complementary paratransit provide a level of service that is comparable to that provided by the fixed-route system and may constitute a capacity constraint. By establishing such requirements for paratransit service, the MBTA places additional conditions upon eligible persons' use of The RIDE, which may prevent or discourage eligible passengers from using the system. Under Section 37.131(f)(3) of DOT ADA regulations, transit systems may not engage in any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons.

## 4.2 ADA Complementary Paratransit Eligibility Process

1. To meet the requirements of Section 37.123(e)(3) of the DOT ADA regulations, the MBTA must revise its eligibility determination process to consider an applicant's ability to independently board, ride, and disembark from its fixed route vehicles, and travel independently to and from boarding and disembarking locations. The determination process must also consider the interaction of the applicant's disability with any architectural and/or environmental barriers such as distance, terrain, and weather that may prevent the applicant from independently traveling to or from a bus stop or rail station. Leaving out these conditions has the effect of inappropriately limiting eligibility for those applicants whose most limiting condition is this interaction. As part of the revision, the MBTA may find it necessary to revise its application form to request more information about issues related to getting to and from stops/stations and physical and environmental barriers that affect the travel of applicants and to conduct follow up with applicants and professionals named in the applications.
2. To meet the requirements of Section 37.123(e), the MBTA must ensure that the portion of the form which medical professionals are required to complete clearly indicates whether the questions are designed to solicit information concerning cognitive abilities, physical abilities, or both. As mentioned in Finding #1, the eligibility process must consider physical and

sensory skills and abilities, such as maximum walking distance and street crossing ability. Including the ability to respond with “sometimes” in addition to yes or no will help to clarify the information. Finally, providing a space for additional information will also help with application reviews, particularly if MBTA is imposing conditions on eligibility determinations.

3. To meet the requirements of Section 37.121-123 of the DOT ADA regulations, the MBTA must ensure that its eligibility determinations consider whether rail stations are accessible or inaccessible.
4. 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 and thereafter until the eligibility determination is made. Based on a sample of 26 eligibility determinations made in July 2010, the MBTA did not make any determinations within 21 days. To meet the requirements of Section 37.125(c) of the DOT ADA regulations, in those instances where eligibility determinations take more than 21 days after receipt of a complete application, the MBTA must treat applicants as eligible and provide service to them on the 22nd day and thereafter until and unless the application is denied. Developing a method for tracking application processing time is essential to granting presumptive eligibility in a timely manner. The MBTA is not permitted to wait until an applicant calls to check on the status of his or her application. Appendix D to the DOT ADA regulations explains “service may be terminated only if and when the entity denies the application.”
5. To meet the requirements of Section 37.125(g), the MBTA will be required to develop a process and procedure for tracking eligibility appeals and appeal decisions. As of the time of the review, the MBTA had no information to provide to the review team on the number of appeals requested, decisions reversed, decisions upheld, and decisions remanded to MBTA for reconsideration. Tracking this information is important in the event that a complaint is filed with MARTA and or with FTA. At the time of the review, OTA staff stated that they could recall only two appeals in the last 17 years. At the same time, staff stated that appeals are received and that OTA follows up with the applicant or the named professional on the additional information and most frequently finds the applicant eligible. FTA is concerned that MBTA and OTA RTA may have made revisions to determinations on a case by case basis only, rather than also tracking the appeals 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.
6. To meet the requirements of Section 37.125 of the DOT ADA regulations, the MBTA must ensure that its paratransit eligibility process does not pose unreasonable administrative burdens on applicants. The review team found two as described in this chapter.
  - a. The practice of encouraging applicants to prepare a written response as a precursor to obtaining the required opportunity to be heard and to present arguments and information could dissuade applicants from exercising their appeal rights and could constitute an unreasonable administrative burden. However, the MBTA may require that applicants file a notice of intent to appeal.
  - b. The MBTA’s practice of returning applications with the letter containing the statement of ineligibility could dissuade people from submitting the additional

- information and may actually give some applicants the impression that they need to reapply for their applications to receive consideration.
7. In the event the MBTA chooses to implement its suspension policy, to meet its obligations under Section 37.125(h) of the DOT’s ADA regulations, the MBTA must specify the length of the suspension and must ensure that it is reasonable; the policy must be revised to reflect that ***only no-shows under the rider’s control*** will be charged against riders and only if they fail to board after the 5 minute vehicle wait time or cancel at the door ***when the vehicle arrives within the pickup window***, as trips missed by system error must not be counted against passenger. The MBTA may not count those instances where the vehicle arrives outside of the pickup window and the rider elects not to board. The policy must take frequency of use into account, as the intent of the regulation is to deter or deal with chronic no shows and that sanction can only be imposed for a pattern or practice of missing scheduled trips which involves intentional repeated or regular actions by both frequent and infrequent riders and not isolated accidental or singular incidents.
  8. FTA will require the MBTA to submit information clarifying whether its “met at both ends” eligibility is a type of assisted transfer or hand-to- hand transfer agreement or whether this is in fact a type of conditional eligibility, where the rider is eligible to use THE RIDE under certain conditions and is able to use the MBTA fixed route bus and rail under certain conditions.
  9. FTA will require the MBTA to submit information clarifying its eligibility determination requiring travel with an attendant. Review team conversations with OTA staff suggested that travel with an attendant is only authorized when applicants need a level of supervision on the vehicle that the paratransit driver cannot provide and that this decision is reached in consultation with the applicant’s guardian. The review team’s analysis of a sample of applications suggest that in at least two cases, OTA imposed this requirement based on speculation on the need for supervision in violation of Section 37.5(e) of the DOT ADA regulations.

## 4.3 Telephone Access

1. Section 37.131(b)(2) of the DOT ADA regulations permits transit systems to negotiate pickup times with paratransit passengers but prohibits requiring the individual to schedule a trip to begin more than one hour before or after his or her desired departure time. Page five of *THE RIDE Guide* states, “After the close of reservations, trips for the following day are scheduled.” Eligible individuals reserving a trip on The RIDE are not provided with a pickup time until the evening before the scheduled trip, and notification is via an automated call. In the event that the pickup time is incorrect – i.e., either more than an hour before or after the passenger’s requested pickup time or completely inaccurate – the passenger has little opportunity to correct the error, or to negotiate a more acceptable pickup time within the 120-minute timeframe surrounding the passenger’s original request. For example, if a passenger wishes to travel at 8:00 a.m., and the automated call informs the passenger that his or her pickup time will be 8:45 a.m., the passenger has no opportunity to negotiate for a 7:15 pickup if that would better serve his or her travel needs. Under Section 37.131(b)(2) , the MBTA must schedule and provide paratransit service to any ADA paratransit eligible person at any requested time on a particular day in response to a request for service made the previous day.

Consequently, the passenger must be provided the opportunity to adjust their pickup time on the day before the requested service.

## 4.4 Service Performance

1. MBTA must cease requiring paratransit passengers to use “body belts” as a condition of service. The DOT ADA regulations at 49 C.F.R. § 37.165(c)(3) permits MBTA to require passengers to permit their wheelchair to be secured, but does not permit requirements for additional securement of their person. The requirement for wheelchair securement devices for buses and vans, found in 49 C.F.R. § 38.23(d), contain various performance standards for attachment points and forces that must be withstood, and also requires seat belts and shoulder harnesses for each securement location. However, there is no provision for separate trunk supports or “body belts,” which would not be expected to be a component of the vehicle’s securement system but of a passenger’s wheelchair seating system if needed for positioning purposes. MBTA’s policy requiring paratransit drivers to secure wheelchair users with a “body belt” that wraps around the rider’s torso and the backrest of his or her wheelchair is both dangerous and contrary to regulatory requirements established under DOT ADA implementation regulations.

## 5 ADA Complementary Paratransit Service Criteria

This chapter presents information about the compliance of THE RIDE policies with the regulatory criteria for each of the following areas:

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

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

### 5.1 Consumer Comments

In advance of the site visit, the review team interviewed 11 riders by telephone. None of the riders contacted in advance expressed concerns about service criteria. Five riders reported that the MBTA does not sufficiently address all of their complaints, and three of these riders mentioned that the MBTA does not always inform them of how they resolved the complaint.

### 5.2 Type of Service

Transit agencies may designate the “base” level of rider assistance that they provide as either curb-to-curb or door-to-door; § 37.129(a) of the DOT ADA regulations states that ADA complementary paratransit service must be provided on an “origin-to-destination” basis. According to the DOT regulations and DOT guidance on the subject, 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 includes having policies and procedures in place for assisting riders to and from the vehicle to the front door in a safe and reasonable way.

The MBTA’s written policies in *THE RIDE Guide* indicate that the drivers are required to offer door-to-door service to riders, and are therefore compliant with the DOT ADA regulations.

When riders travel between service areas, they are transferred between the contractors that serve the respective service areas (if a trip crosses just one town into the other service area, there is no transfer). The MBTA requires contractors to make vehicle-to-vehicle transfers; the contractor transports the customer to and from a transfer point and waits with the customer in the first vehicle until the transfer vehicle arrives. The transfer points are Ruggles Station in Roxbury (Boston), Oak Grove Station in Malden, and the MBTA Busway in West Roxbury (Boston).

### 5.3 Service Area

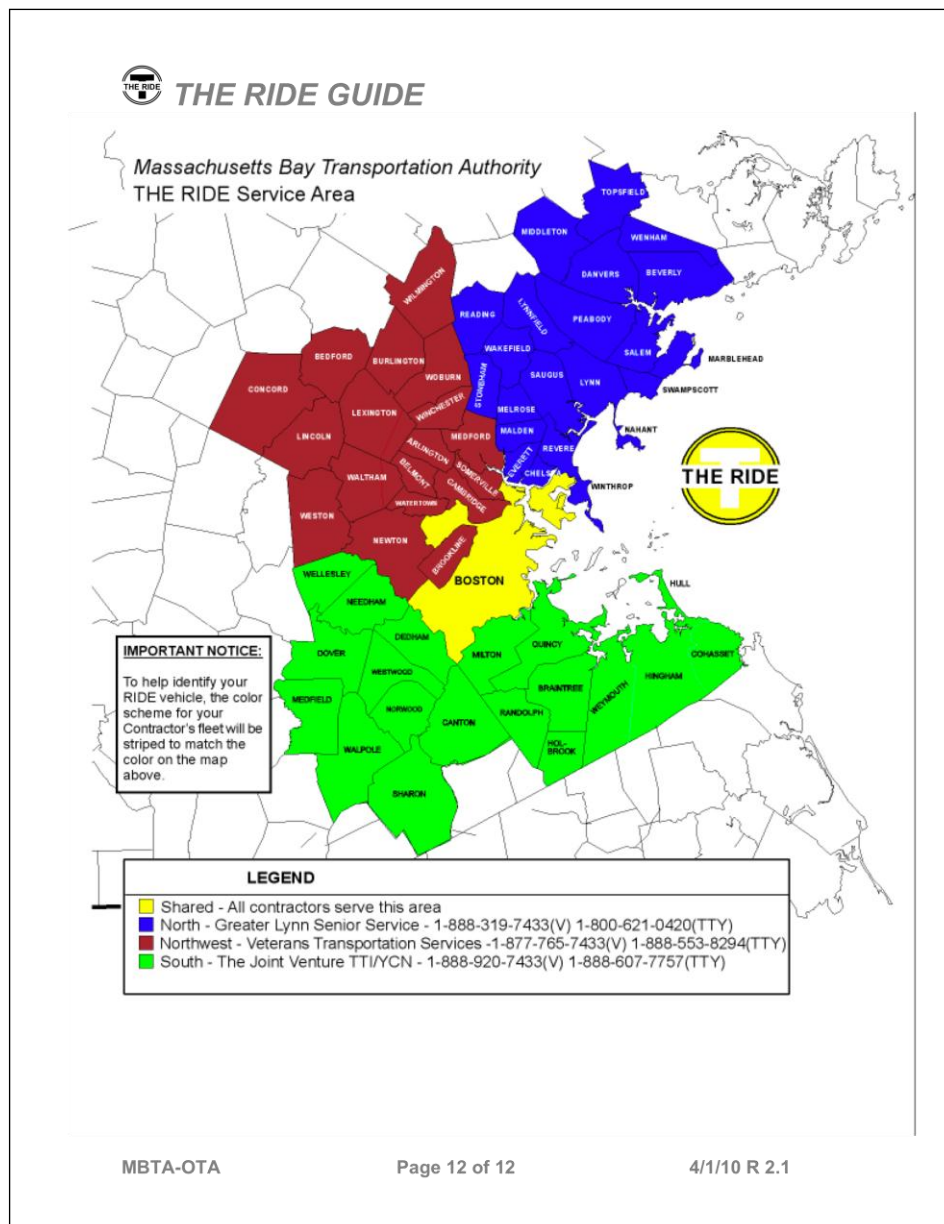
Section 37.131(a)(1) of the DOT ADA regulations require transit systems operating fixed route bus service to provide ADA complementary paratransit service that covers, at a minimum, all areas within 3/4-mile of all of its bus routes, along with any small areas within its core service area that may be more than 3/4-mile from a bus route, but are otherwise surrounded by served corridors. The service area for ADA complementary paratransit service must include areas

outside of the defined fixed route jurisdiction—such as beyond political boundaries or taxing jurisdictions—that are within 3/4-mile of the transit system’s fixed route, unless the public transit system does not have the legal authority to operate in those areas.

As described in Chapter 2, three contractors operate THE RIDE under contract to the MBTA. The service area and its operators are illustrated in Figure 5.1 and consist of:

- Northwest Service Area, operated by Veterans Transportation Services (VTS)
- North Service Area, operated by Greater Lynn Senior Services (GLSS)
- South Service Area, operated by Joint Venture (JV)

**Figure 5.1 – THE RIDE Service Area**



THE RIDE provides service to a larger area than DOT ADA regulations require. Pre-dating the DOT ADA regulations, the MBTA chose to operate THE RIDE in entire municipalities through which fixed route service travels. The MBTA also chose to provide THE RIDE in neighboring municipalities that did not have fixed route service. For instance, while the towns of Topsfield, Middleton, Dover, and Medfield do not have fixed route service within 3/4-mile of their borders, THE RIDE serves these towns. The MBTA chooses to offer THE RIDE within the entirety of any of the 60 municipalities served by fixed route bus and rail (excluding commuter rail).

The MBTA has a contracted bus route (#716) with its southern terminal in the Town of Canton, which is in service area of THE RIDE. However, the last stop of this route is within 1/4-mile of the Town of Stoughton, which THE RIDE does not serve. At minimum, the MBTA should provide RIDE service in Stoughton within 3/4-mile of MBTA's Route 716.

The MBTA has bus service to Brockton, which is south of its defined service area for THE RIDE. It accommodates RIDE users via a transfer to the paratransit service operated by the Brockton Area Transit (BAT) system. Further discussion of BAT paratransit service is presented below.

## 5.4 Days and Hours of Service

Section 37.131(e) of the DOT ADA regulations requires that the ADA complementary paratransit service be available during the same hours and days as the fixed route service. If a person can travel between two given points using a given fixed route at a given time of day, an ADA paratransit eligible person must be able to travel between those same points on paratransit at that time of day. This criterion recognizes that the shape of the service area can change. 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.

According to *THE RIDE Guide*, "THE RIDE service operates seven days a week (including holidays) with first pick up generally from 5 a.m. and ending at 1 a.m. (mirroring the Fixed Route schedule in your area)." The MBTA has a number of fixed routes that begin service before 5 a.m. and end service after 1 a.m. on weekdays. On weekdays, the earliest MBTA bus leaves Mattapan Station in Boston at 3:20 a.m., while the latest bus ends service at 1:46 a.m. in Lynn.

Information about service hours in *THE RIDE Guide* is inconsistent with service hours information in contractor contracts. Excerpts from the three contracts state that service operates 7 days a week from 6 a.m. to 1 a.m., with exceptions for select towns: Stoneham in the North; Weston in the Northwest; and Dedham, Medfield, Needham, Norwood, Sharon, Walpole, Wellesley, and Westwood in the South. Starting times for these towns are earlier (as early as 4:50 a.m. for some South towns on Monday to Saturday).

The MBTA should ensure that paratransit service is available in the areas where bus and/or rail service runs before 5 a.m. or after 1 a.m. It should confirm that the contractors' reservationists know the proper service hours and that the ADEPT software does not prevent such trips from being scheduled. The MBTA should also confirm that the contractors have the available staff (such as drivers and dispatchers) to provide any early morning or late evening trip that is within the service hours of comparable fixed route service.

As mentioned above, the MBTA operates Route #230 that has its southern terminal in Brockton, which is not part of THE RIDE service area. The MBTA also operates Route #240 that has its southern terminal in the Town of Avon (adjacent to Brockton), also not part of THE RIDE service area. If a RIDE rider wants a trip to or from Brockton or Avon to a municipality in the RIDE service area, the rider must arrange a transfer with Brockton Area Transit Authority's "dial-a-bat" paratransit system. If a rider wants a trip within either Brockton or Avon or between Brockton and Avon, that rider must arrange the trip with *dial-a-bat*. However, service hours on *dial-a-bat* are more limited than the service hours of Routes #230 and #240, as presented in Table 5.1.

**Table 5.1 – Service Hours for MBTA Bus Routes #230 and #240 and dial-a-bat**

Service	City/ Town	Start time (M-F)	End Time (M-F)
MBTA Route 230	Brockton	5:39 a.m.	11:42 p.m.
dial-a-bat	Brockton	6:15 a.m.	8:30 p.m.
MBTA Route 240	Avon	5:55 a.m.	12:12 a.m.
dial-a-bat	Avon	6:15 a.m.	5 p.m.

As a result, paratransit riders who want to travel in Avon and Brockton within 3/4-mile of either Route 230 or Route 240 are not able to receive early morning or evening service, even though fixed route service is available. This is not compliant with Section 37.131(h) of the DOT ADA regulations.

## 5.5 Fares

Section 37.131(c) of the DOT ADA regulations requires that ADA complementary paratransit fares be no more than double the non-discounted fixed route fare for a comparable fixed route trip. In addition, fares for individuals accompanying ADA complementary paratransit riders must be the same fare as for the ADA complementary paratransit rider. Personal Care Attendants (PCAs) are permitted to travel at no charge. Finally, a transit system may charge a higher fare to a social service organization or other organization for agency trips (guaranteed trips).

The cash fare for a one-way trip on the MBTA is \$1.50 on fixed route bus and is \$2 on rapid and light rail. The fare for an ADA complementary paratransit service trip is \$2. Personal care attendants (PCAs) who accompany a certified rider do not pay a fare, while companions who accompany a certified rider also pay a \$2 fare. THE RIDE fare thus complies with the DOT ADA regulations.

For trips between two RIDE service areas that involve a transfer, the fare is still \$2.

Riders who transfer between THE RIDE and the ADA complementary paratransit service of another transit system pay two fares. In general, the DOT ADA regulations do not prohibit requiring payment of two fares, just as long as the resulting paratransit fare is no more than double the fare of the comparable trip on fixed route. However, in the case of a RIDE rider who travels between the RIDE service area and Brockton or Avon, the total one-way fare is \$4 (dial-a-bat fare is \$2). If the destination in Brockton or Avon is within 3/4-mile of Route 230 or Route 240 (discussed above), and the comparable fixed route trip would require riding only one bus, then the fixed route fare would be \$1.50. For such RIDE trips, the fare is more than double the fare of the comparable fixed route trip and therefore not in compliance with the regulations.

THE RIDE's three contractors each collect fares through a pre-payment system; riders do not exchange cash with drivers. Each contractor requires that a rider have at least \$12.00 in his or her account before making a reservation. In contrast, there is no requirement that fixed-route passengers carry a minimum of \$12 in their pockets in order to ride the bus. The minimum balance requirement may be inconsistent with the general requirement that complementary paratransit provide a level of service that is comparable to that provided by the fixed-route system and may constitute a capacity constraint. By establishing such requirements for paratransit service, MBTA places additional conditions upon eligible persons' use of The RIDE, which may prevent or discourage eligible passengers from using the system. Under Section 37.131(f)(3) of DOT ADA regulations, transit systems may not engage in any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons.

*THE RIDE Guide* suggests four methods of payment for a rider's prepaid account: call the OTA office with credit/debit account information; go to THE RIDE's website with credit/debit account information; send a check or money order to the OTA office; or visit the MBTA's Systemwide Accessibility office with cash, check, money order or credit/debit card. The processing time to add funds ranges from five business days for U.S. mail, to two business days for accounts processed by phone or online, to one hour or less at the Back Bay Station sales location. This lead time, together with the need to establish a prepaid account prior to reserving a trip, compromises MBTA's ability to meet the next-day response time for eligible riders as required under Section 37.131(b) of DOT ADA regulations. In contrast, multiple fare-payment options (including cash) are available to MBTA fixed-route passengers, and passengers using the "CharlieCard" are able to add funds instantly at any station. This operational practice may violate DOT ADA regulations at Section 37.131(f)(3), which prohibits transit systems from engaging in any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons.

## 5.6 Trip Purpose

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

The MBTA meets this requirement as *THE RIDE Guide* does not specify trip purpose, there is no prioritization in scheduling, and the review team witnessed no reservationists requesting trip-purpose information.

## 5.7 Coordination with Adjacent Service Providers

ADA regulations require transit agencies to coordinate with agencies with overlapping or contiguous service areas for paratransit riders who want to travel between service areas.

There are three fixed route transit systems with contiguous service areas. THE RIDE has arranged a transfer point for ADA complementary paratransit riders with each system, as listed in Table 5.1.

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

<b>Transit System</b>	<b>Transfer Locations</b>
Brockton Area Transit Authority (BAT)	Brockton Rail Station Cobbs Corner (Canton)
Lowell Regional Transit Authority (LRTA)	Common bus route stop in Burlington
MetroWest Regional Transit Authority	Wellesley Farms Rail Station

Riders are responsible for making reservations with each system’s ADA complementary paratransit system for any trip that requires a transfer. Riders also pay fares separately for trips on each ADA complementary paratransit system.

THE RIDE and other service providers arrange live hand-offs of transferring riders (i.e., the first driver routinely waits for the second driver to arrive with the rider). The MBTA’s policy and practice of waiting with transferring riders complies the DOT ADA regulations.

Although THE RIDE coordinates transfers with the three contiguous transit agencies, OTA staff did not have written agreements on the transfer practices with the agencies. Such agreements would help to ensure continued compliance with the DOT ADA regulations regarding coordination.

## **5.8 Complaint-Handling Process**

While requirements to respond to complainants are not included in the DOT ADA regulations, transit providers are required to receive and maintain records of rider complaints. It is a common and effective practice for transit provider to respond to complainants and for transit providers to investigate allegations to ensure that all DOT ADA requirements are being met.

As part of the review, the MBTA provided the review team with reports summarizing complaints recorded from July 1, 2009, to June 30, 2010. The MBTA also provided copies of complaints received in April 2010.

### **Complaint Policies and Procedures**

Riders wishing to log a complaint about any MBTA services, including THE RIDE, have several options for filing complaints as summarized in Table 5.2.

*THE RIDE Guide* includes a complaint or compliment form with fields to include rider contact information, complaint or compliment type, a space for comments, and date of receipt. The form includes postal, fax, email, and phone contact information for submission. Despite this form, OTA staff often receives complaints and comments by informal email, letters or phone calls.

A review of the three contractors’ websites, which at the time of the review were accessed from the main THE RIDE page on the MBTA’s website, revealed an inconsistency regarding directing feedback to the contractor. While both JV and GLSS had a “Contact Us” tab on their landing pages, the VTS site did not have such a tab. Further, the VTS page had a “VTS Home” link that does not connect to another page.

**Table 5.2 – Complaint Options and Handling Procedures for THE RIDE**

<b>Option</b>	<b>Procedure</b>
Call MBTA Rider Support Services	MBTA staff assigns a number to the complaint, enters it in

	the MBTA's Help Expert Assistance Tool (HEAT) database, and forwards the complaint to OTA
Contact one of the three contractors	Contractors that receive a complaint record and forward it to OTA for processing.
Call, e-mail, fax, or write to OTA	OTA staff enters all forwarded or directly received complaints into in the Advanced Database Environment for Planning and Tracking (ADEPT) database, a system unique to OTA

Once OTA enters a complaint in ADEPT, contractors have 10 days to address it. Contractors must respond in the method (e.g., letter, phone call, e-mail) requested by the complainant, if specified. If not specified, contractors must respond in a manner that is to the satisfaction of OTA. In order to ensure that comment responses are of proper quality, OTA requires a principal of each of three contractors to review the responses and sign a log. Failure to respond completely adequately within 10 days results in a \$50 penalty for each complaint; there is no progressive fine for each day beyond 10 days that the penalty is not addressed. OTA keeps copies of the complaint and response on file for one year. At the end of the year, OTA summarizes the complaints and prepares a summary report, which it preserves for 5 years.

In addition to forwarding complaints to and monitoring responses from the contractors, OTA circulates complaints to the Access Advisory Committee to the MBTA (AACT), which, according to *THE RIDE Guide*:

... is a consumer body composed primarily of persons with disabilities, THE RIDE riders, advocates and representatives of disability advocacy groups and agencies who advise and make recommendations to the MBTA regarding accessible transportation for both our fixed route services (buses, subway and trains) as well as THE RIDE ... An elected Executive Board governs AACT... The Executive Board is involved in researching and reviewing complaints for riders at the rider's request.

## Analysis of Complaint Response Times

The review team examined annual reports compiled by OTA from July 1, 2009, to June 30, 2010 (FY 2010). The OTA report tracks all complaints but does not include the number of commendations and suggestions received from riders. The report indicates the receipt of 1,703 valid complaints regarding ADA complementary paratransit service during that time. Of this total, 1,676 complaints were related to activities of the contractors, while 27 complaints were related to activities of OTA or other MBTA staff.

Table 5.3 summarizes complaints by contractor and overall for the categories in OTA's annual report. The discrete categories refer to the following common complaints:

- "Problem with driver" includes hazardous or unsafe driving, unfriendly service, or improper use of equipment
- "Promptness of pickup/drop-off" refers to unexpectedly long trips or "where's my ride (WMR)?" complaints
- "Scheduling problem" frequently consists of early or late pickups or drop-offs or long trips
- "Dispatcher problem" usually indicates a disagreement between a rider and a dispatcher

- “Other” encompasses ride cancellations, issues with automated phone prompts, lengthy idling, or disagreement about the contractor’s response to an earlier complaint
- “Difficulty in getting a ride” typically refers to no-show issues
- “Problem with reservationist” specifies a difficult conversation between a rider and a reservationist
- “Comfort of ride” may involve difference of radio station preference, excessively loud noise related to operation of accessibility equipment, or issues with other passengers
- “Condition of vehicle” often includes vehicles in disrepair
- “Problem with telephone” refers to long telephone hold times or inaccurate automated phone calls from the contractor

As shown in the table, 618 complaints related to contractor activities received during this period (37 percent) concerned problems with drivers—the highest rate of complaints in this category coming from the VTS service area northwest of Boston. Twenty-one percent of complaints related to contractor activities referred to “promptness”: timely pickups and drop-offs. Scheduling problems accounted for 16 percent of all complaints related to contractor activities. Other issues, including trip reservations and quality of the trip experience, each accounted for less than 10 percent of the complaints received related to contractor activities.

**Table 5.3 – Summary of Complaints by Contractor – July 2009 to June 2010**

Complaint Category	Total		GLSS		JV		VTS	
	Num	%	Num	%	Num	%	Num	%
Driver	618	37%	157	35%	195	29%	266	48%
Promptness	353	21%	101	22%	153	23%	99	18%
Scheduling	268	16%	88	19%	134	20%	46	8%
Dispatcher	121	7%	30	7%	53	8%	38	7%
Other	81	5%	30	7%	18	3%	33	6%
Getting a Ride	86	5%	14	3%	63	9%	9	2%
Reservationist	44	3%	15	3%	15	2%	14	3%
Comfort of Ride	32	2%	7	2%	13	2%	12	2%
Condition of Vehicle	33	2%	5	1%	8	1%	20	4%
Telephone	40	2%	8	2%	17	3%	15	3%
<b>Total</b>	<b>1,676</b>	<b>100%</b>	<b>455</b>	<b>100%</b>	<b>669</b>	<b>100%</b>	<b>552</b>	<b>100%</b>

As shown, GLSS had 27 percent of the complaints, JV had 40 percent of the complaints, and VTS had 33 percent of the complaints. The complaint management system in place at the MBTA is comprehensive and well managed. The MBTA complies with DOT’s requirement to keep complaint records for one year and complaint summaries for five years. The recordkeeping system and reporting are consistent with DOT ADA regulations.

## 5.9 Findings

1. Section 37.131(a)(1) of the DOT ADA regulations requires transit systems operating fixed route bus service to provide ADA complementary paratransit service that covers, at a minimum, all areas within 3/4-mile of all of its bus routes. The last stop of the MBTA’s contracted bus route (#716) is within 1/4-mile of the Town of Stoughton, which THE RIDE

does not service. At a minimum, the MBTA must provide RIDE service in Stoughton within 3/4-mile of MBTA's Route #716.

2. THE RIDE service hours do not cover as broad a span of hours as the fixed route service, and this is not compliant with Section 37.131(e) of the DOT ADA regulations. The MBTA must ensure that THE RIDE service is available during the same hours that comparable fixed route service is available.
  - a. THE RIDE provides ADA complementary paratransit service 365 days a year, generally from 5 a.m. to 1 a.m. The MBTA has a number of fixed routes that begin service before 5 a.m. and end service after 1 a.m. on weekdays. On weekdays, the earliest MBTA bus leaves Mattapan Station in Boston at 3:20 a.m., while the latest bus ends service at 1:46 a.m. in Lynn.
  - b. Riders who want to travel in Avon and Brockton must transfer to Brockton Area Transit Authority's "dial-a-bat" paratransit service. MBTA bus routes 230 and 240, which travel into these municipalities, both begin service earlier than *dial-a-bat* and both end service later than *dial-a-bat*. As a result, RIDE riders who want to travel within 3/4-mile of either MBTA bus Routes 230 or 240 are not able to receive early morning or evening service, even though fixed route service is available.
3. Section 37.131(c) of the DOT ADA regulations requires that ADA complementary paratransit fares be no more than double the non-discounted fixed route fare for a comparable fixed route trip. The MBTA's cash fare for fixed route bus service is \$1.50 and the fare for subway service is \$2. The RIDE fare is \$2, which complies with DOT ADA regulations. However, in the case of a RIDE rider who travels between the RIDE service area and Brockton or Avon, the total one-way fare is \$4 (*dial-a-bat* fare is \$2). If the destination in Brockton or Avon is within 3/4-mile of MBTA bus Route 230 or Route 240, and the comparable fixed route trip would require riding only one bus, then the fixed route fare would be \$1.50. For such RIDE trips, the fare is more than double the fare of the comparable fixed route trip and therefore is not in compliance with the regulations.
4. Under DOT ADA regulations at Section 37.131(b), transit providers must provide next-day response time for eligible riders. According to *THE RIDE Guide*, fares for The RIDE can only be paid via prepaid customer account. The processing time to add funds ranges from five business days for U.S. mail, to two business days for accounts processed by phone or online, to one hour or less at the Back Bay Station sales location. This lead time, together with the need to establish a prepaid account prior to reserving a trip, compromises the MBTA's ability to meet the next-day response time for eligible riders as required under Section 37.131(b) of DOT ADA regulations. The only means by which an eligible rider would be able to establish the necessary prepaid account and reserve a trip for the next day would be to travel to the Back Bay Station sales location. However, the Back Bay Station is only open on weekdays, and riders may not be able to reach the Back Bay Station without first reserving a paratransit trip. In contrast, multiple fare-payment options (including cash) are available to MBTA fixed-route passengers, and passengers using the "CharlieCard" are able to add funds instantly at any station. This operational practice may violate DOT ADA regulations at Section 37.131(f)(3), which prohibits transit systems from engaging in any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons.

5. *THE RIDE Guide* states that eligible passengers must maintain a minimum balance of \$12 in their prepaid accounts in order to reserve a trip. In contrast, there is no requirement that fixed-route passengers carry a minimum of \$12 in their pockets in order to ride the bus. The minimum balance requirement may be inconsistent with the general requirement that complementary paratransit provide a level of service that is comparable to that provided by the fixed-route system and may constitute a capacity constraint. By establishing such requirements for paratransit service, the MBTA places additional conditions upon eligible persons' use of The RIDE, which may prevent or discourage eligible passengers from using the system. Under Section 37.131(f)(3) of DOT ADA regulations, transit systems may not engage in any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons.

## 5.10 Recommendations

1. The MBTA should confirm that the contractors' reservationists know the proper paratransit service hours and that the ADEPT software does not prevent trips before 5 a.m. or after 1 a.m. from being scheduled. The MBTA should also confirm that the contractors have the available staff (such as drivers and dispatchers) to provide any early morning or late evening trip that is within the service hours of comparable fixed route service. The MBTA may also consider making a formal amendment to the contractor contracts that state incorrect hours of service.
2. The MBTA may consider eliminating the requirement for a paratransit transfer for service to Brockton or Avon if the destination is within 3/4-mile of a MBTA bus route.
3. The MBTA should consider formalizing its coordination agreements with the adjoining transit agencies. This should include level of service at the transfer locations, days and hours, fares, and eligibility.

## 6 ADA Complementary Paratransit Eligibility

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

The review team examined the process used to determine applicants' eligibility for ADA complementary paratransit service to ensure that determinations are being made in accordance with the regulatory criteria and in a way that accurately reflects the functional ability of applicants. The review team also assessed timeliness of the processing of requests for eligibility and carried out the following tasks:

- Obtained input about the eligibility determination process through interviews with riders and advocates and a review of consumer input on file at the MBTA
- Developed an understanding of the handling and review of applications through an assessment of current eligibility materials and interviews of eligibility determination staff
- Reviewed eligibility determination outcomes for the period of July 2009 through May 2010
- Reviewed the application files of applicants denied ADA complementary paratransit eligibility

### 6.1 Consumer Comments

Only one of the 11 riders contacted in advance of the site visit described recent issues with the initial eligibility determination process, noting that she had to go to the Office of Transportation Access (OTA) to submit the application. That same rider said that it took OTA more than 21 days to determine her eligibility. Another rider commented that when he applied 10 years ago, OTA took more than 3 months to determine his eligibility. The nine remaining riders indicated no problems with timely eligibility determinations or with the recertification 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 is available in accessible formats, upon request.

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

Section 37.125(e) requires the transit system to provide documentation to each eligible individual stating that he or she is ADA 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 ADA complementary paratransit coordinator
4. Expiration date for eligibility
5. Any conditions or limitations on the individual's eligibility, including the use of a PCA

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

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

## Initial Determination Process

Individuals interested in applying for eligibility to use THE RIDE must complete and submit an Application for Certification of ADA Paratransit Eligibility. The 4-page application is available by calling OTA, from the MBTA website, or from area disability service organizations.

The applicant completes pages 1–3 of the application form and the fourth page is to be completed by a licensed human service or health care professional. These can be physicians, psychiatrists, level III social workers, rehabilitation professionals, physical or occupational therapists, mobility instructors, physicians' assistants, nurse practitioners, or registered nurses. Attachment D displays a copy of the instruction letter and application form.

The pages to be completed by the applicant request the following information:

- General information (name, address, phone number, emergency contact, etc.)
- Whether the applicant uses a personal care attendant
- Type of disability
- Types of mobility aids used
- Whether the applicant can enter a vehicle that does not have a lift or ramp
- Whether the applicant, without the assistance of another person, can safely walk 200 feet, 1/4- mile, 1/2-mile, or 3/4-mile
- Whether the applicant can climb three 12-inch steps without assistance
- Whether the applicant can wait outside without support

- A general explanation of the disability and how it prevents the applicant from using fixed route services
- Whether the disability is temporary and, if so, the expected duration

The health professional page requests:

- A narrative assessment of the applicant’s “functional level of mobility” and whether the professional agrees with the applicant’s statement about inability to use fixed route services
- Whether the applicant can “Give information such as address and telephone number on request”
- Whether the applicant can “Recognize a destination or landmark”
- Whether the applicant can “Ask for, understand and follow directions”
- Whether the applicant can “Safely travel through crowded and/or complex MBTA facilities”

The application does not specifically request information about physical or environmental barriers that might prevent applicants from getting to and from bus stops or rail stations. Applicants have the opportunity to describe these issues in answers to the open-ended questions. The application does not include questions about the applicant’s ability to get to or from bus stops for reasons such as a lack of curb ramps, inaccessible paths of travel, busy or uncontrolled street crossings, accumulations of snow or ice, severe heat or humidity, or other significant environmental or physical barriers.

Applications are processed by OTA staff. Upon receipt, OTA first checks to make sure the application is complete. If not, OTA sends the applicant a letter explaining that information was missing or incomplete; attached to the letter is a copy of the applicable page(s) of the application that needs completion. OTA has several form letters that cover most of the situations that would cause an application to be deemed incomplete. The most common reasons are:

- Page 4 (information from a licensed professional) is not completed
- Page 4 is completed by someone who does not qualify as a licensed professional or their license number is missing
- Page 4 is not signed or has a signature stamp rather than the licensed professional’s original signature
- Page 4 is a fax or copy rather than an original
- The information provided by the licensed professional is not detailed enough
- Important information is missing from the applicant on Pages 1–3

These letters informing the applicant that their application is incomplete begin with a statement that the applicant had been found ineligible and include information about the appeal process. The letters also explain that the application is incomplete. By starting the letter with a statement of ineligibility when the letter is intended to notify an applicant that his/her application is incomplete, OTA may be unnecessarily confusing the applicant and potentially discouraging the submission of the missing information.

Because of the FTA site visit, OTA had subsequently revised the language in these letters and transmitted copies of the revised letters to the review team. The first paragraphs of the letters no

longer state that the application had been found incomplete. Attachment E presents a sample copy of the original letter and the first page of the revised letter.

Prior to the site visit, OTA assigned two people to review the applications and had just hired a third staff person for this role. These three employees share the responsibility for reviewing applications. If the application is unclear or if a particular determination involves complex or difficult issues, another staff member reviews the application. OTA might follow up by phone to request more information from applicants.

If the information on the fourth page is insufficient to make a determination, OTA typically returns the application and asks the medical professional for a more complete narrative on the applicant's functional ability. OTA typically only speaks with the corresponding medical professional after they have first returned the application.

## Types of Eligibility Granted

If OTA determines that an applicant is eligible, OTA grants the following types of ADA complementary paratransit eligibility: unconditional, conditional, or temporary. OTA grants the following types of conditional eligibility:

- Seasonal – from November through March if applicants are prevented from using fixed route service due to accumulations of snow or ice or extreme cold weather.
- Night blindness – for travel during night hours only if applicants have vision disabilities that prevent them from navigating to or from bus stops when it is dark.
- Met on both ends – for applicants that cannot be left unattended at drop-off locations but can independently travel on ADA complementary paratransit vehicles without supervision.
- Travel with attendant – for applicants with behavioral issues that require supervision while traveling on ADA complementary paratransit vehicles.

While OTA grants conditional eligibility for snow, ice, cold, and heat, OTA does not grant conditional eligibility for terrain issues such as such as lack of curb ramps, long distances to stops, or inaccessible bus stops. Leaving out these conditions has the effect of inappropriately limiting eligibility. For example, if conditional eligibility were due to snow and ice, the rider would not be eligible in the summer even though he or she may have issues getting to and from bus stops due to physical barriers.

When asked about the “travel with attendant” condition, OTA explained that this condition is only established after discussions with guardians or licensed professionals who agree that the rider would likely need an attendant while riding due to behavioral issues. While § 37.5(e) of the DOT ADA regulations prohibits the transit system from requiring an individual with disabilities to be accompanied by an attendant, it appears in this case that the requirement is being established not by OTA, but by persons with direct involvement in and responsibility for such individuals.

## Eligibility Determination Letters

The review team analyzed samples of the letters that OTA uses in its eligibility determinations. This included letters granting full (unconditional) eligibility, temporary eligibility, and the one

letter that denied eligibility. All letters were on MBTA letterhead (and thus indicated the issuing transit agency) and they included the applicant's name. The chairperson of the Eligibility Review Committee signs all letters and the OTA phone number is included. Expiration dates are included and any conditions or limitations on eligibility are identified. The letter does not explicitly refer to PCAs traveling at no fare because all eligible riders are allowed to state a need for a PCA at the time that trips are booked and no special designation in the determination letters is required.

Letters finding applicants ineligible also noted that they have the right to appeal and include information about how to request an appeal. Letters limiting eligibility (conditional or temporary) also indicated that riders can appeal if they do not agree with the limitations placed on their eligibility.

## Recertification

OTA grants unconditional and conditional eligibility for a period of 3 years. Long-term eligibility for a period of 10 years can be granted when one of the following criteria is met:

- If applicant is 75 years of age or older and has a permanent disability
- If applicant is blind (no level of vision)
- If applicant uses a wheelchair and the disability is permanent
- If applicant uses oxygen
- If applicant is receiving dialysis treatment

OTA grants temporary eligibility for between 3 months and 1 year. The term of eligibility is based on the expected duration of the disability as stated in the application form.

Three months before the date of a rider's certification, OTA sends reminder letters and an application form to all riders whose eligibility is due to expire.

## 6.3 Reported Determination Outcomes

OTA reported that approximately 68,500 individuals were certified as ADA complementary paratransit eligible in the region as of April 2010. With about 900 new applications each month (of which 80 percent are approved), by July 2010 there were an estimated 70,660 eligible riders overall. Of these, approximately 90.4 percent have unconditional eligibility and 9.6 percent have conditional eligibility.

The review team examined OTA workflow reports for eligibility determinations made between July 2009 and May 2010. The reports, summarized in Table 6.1, show the number of pieces of mail handled by type, including the number of new applications and recertification applications received as well as letters sent with a determination of ineligibility or incomplete applications; the letters of ineligibility did not separate out those that were simply incomplete.

During the 45-week period analyzed, OTA received 12,717 applications, or approximately 283 per week (57 per day). Of these, 81.2 percent were from new applicants and 18.8 percent were for recertification.

During this same period, OTA sent out 3,317 letters of ineligibility that included letters of actual ineligibility and letters regarding incomplete applications. A review of a sample of 22 of these letters showed that 17 letters were for incomplete information and five were determinations that

applicants were not eligible. Extrapolating this sample to all of the full set of 3,317 letters of ineligibility, approximately 763 applications during this period resulted in a determination of ineligibility. This represents 6 percent of all applications.

**Table 6.1 – Eligibility Applications and Determination Outcomes, July 2009–May 2010**

<b>Applications</b>	<b>Number</b>	<b>Percent</b>
New Applications Received	10,331	81.2%
Recertification Requests Received	2,386	18.8%
<b>Total Applications</b>	<b>12,717</b>	<b>100%</b>
<b>Determination Outcomes</b>	<b>Number</b>	<b>Percent</b>
Applications Denied or Deemed Incomplete	3,317	26.1%
Applications Approved	9,400	73.9%
<b>Total Determinations</b>	<b>12,717</b>	<b>100%</b>

## 6.4 Process Observations and Reviews of Recent Determinations

To review the appropriateness of determinations, the review team analyzed 47 recent application files for which OTA had made eligibility determinations. This included five applicants who had been denied, 17 cases where it was deemed that the information received was incomplete, 11 cases where unconditional eligibility had been granted, 12 cases where conditional eligibility was granted, and two cases where temporary eligibility was granted. The full files, including the application forms and any subsequent information provided, were reviewed and the determinations were discussed with OTA’s Eligibility Coordinator.

All 12 determinations that resulted in conditional eligibility and both determinations that granted temporary eligibility appeared to be reasonable and appropriate.

Nine of the 11 determinations that granted unconditional eligibility also appeared to be reasonable and appropriate. In two cases, however, the review team raised possible issues with the decisions. These were:

- Applicant #####500:** In this case, the applicant indicated Parkinson’s disease as the health condition/disability, and indicated use of a walker. The licensed professional confirmed this information and stated, “(the applicant) does well with familiar situations & environments but would be unable to negotiate environments that were unfamiliar.” The professional also checked “no” for the questions, “Recognize a destination or landmark,” “Deal with unexpected situations or unexpected changes in routine,” and “Safely travel through crowded or complex MBTA facilities.” The applicant had left blank the question about use of a PCA. OTA granted unconditional eligibility, but the applicant was required to always travel with a PCA. The decision to require a PCA appears to have been made based on the information from the professional with no follow-up with the applicant or the professional. Subsequently, the applicant called to dispute the decision (not a formal appeal) and the professional sent a follow-up letter saying the applicant could travel independently. As a result, OTA removed the requirement to be always accompanied by a PCA. Given the prohibition against

establishing a requirement for attendants contained in § 37.5(e), it would have been best to follow up with the applicant (or caregiver) and professional to determine whether either believed the applicant should not travel unattended.

**Applicant #####179:** Applicant indicated paraplegia as the disability/health condition and indicated use of a manual wheelchair. OTA denied the applicant and the denial appears to have been based largely on the fact that the licensed professional answered “Yes” to the question “Safely travel through crowded or complex MBTA facilities?” The applicant questioned the decision, there were follow-up conversations with the professional, and OTA staff noted on the application “Can’t self propel.” The denial was changed to unconditional eligibility. This decision raised two significant issues about the way that eligibility determinations are made. First, the question about safely traveling through crowded MBTA facilities is in a series of five questions that are clearly aimed at issues of cognition. It is likely that the professional was only indicating that the applicant had the cognitive ability to safely navigate complex stations. The answer to this question appears to have been given much greater meaning by OTA staff without any follow-up with the professional or the applicant. Second, the fact that the applicant could not self-propel certainly prevents the applicant from boarding, riding, and disembarking independently from any fixed-route vehicle, and appears to constitute a specific impairment-related condition that would prevent travel to or from a boarding or disembarking location, consistent with the eligibility criteria under §37.123(e). Information in four of the five files for which OTA found applicants ineligible appeared to support the decisions made. In one case, however, the denial of eligibility did not appear to be appropriate. In this case (Applicant #####556), the applicant indicated use of a power wheelchair due to peripheral vascular disease and neuropathy in both legs and feet. A licensed professional confirmed the disability and use of a power wheelchair. The determination did not seem to take into account that even though the applicant used a powered wheelchair, there would likely be conditions that may prevent the applicant from traveling to or from a boarding or disembarking location. While architectural and environmental barriers such as distance, terrain, and/or weather do not, standing alone, form a basis for eligibility, the interaction of such barriers with the applicant’s power wheelchair could, to the extent that they would prevent the applicant from traveling to or from a bus stop. In addition, the determination did not appear to account for the fact that certain Green Line light rail stations are not accessible to riders who use wheelchairs.

The review team noted that in several cases, OTA returned the applications as incomplete because OTA staff did not feel that the narrative provided by the licensed professional was sufficient to make a final determination. However, team members judged that there appeared to be sufficient information in 11 of the 17 cases that they reviewed. Attachment F provides a summary of the key facts in several of these cases.

In addition, in 10 of these 17 cases for which OTA staff deemed the initial application to be ineligible/incomplete, the applicant and/or the licensed professional subsequently contacted the OTA staff and provided additional information. In all 10 cases, the applicants were found to be eligible. In seven cases, though, the applicants had not yet followed up.

## 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 and thereafter until the eligibility determination is made.

At the time of the on-site review, OTA was not keeping a running log of applications received and processed but was filing processed applications in alphabetical order. In order to review the application processing times, the review team examined 26 applications that OTA had processed the week prior to on-site review but had not yet been filed. The review team compared the date stamps recording the receipt of the application and the date of letters of determination.

Table 6.2 shows the results of this check of processing times. The average (mean) number of days to process an application in this sample was 34 days. The one application that OTA processed in 1 day was for an individual who applied for visitor status. All other applications required at least 30 days, once considered complete. The maximum processing time in this sample was 59 days.

**Table 6.2 – Processing Times for 26 Randomly Selected Recent Eligibility Determinations**

<b>Days to Process</b>	<b>No. of Applications</b>
1 (visitor status)	1
30	2
32	16
34	1
38	1
39	1
45+ (maximum 59 days)	4
<b>Total</b>	<b>26</b>
<b>Average processing days</b>	<b>34 days</b>

OTA returned four applications as incomplete; once returned, OTA processed these four applications in 30–49 days. For the 21 applications that were complete when initially received, the range of processing time was 30–59 days.

OTA staff was aware that their processing time was significantly longer than 21 days, and was in the process adding another person to process applications. To ensure that current riders did not lose eligibility due to OTA's delays in processing applications, OTA routinely checks the date of expiration on all current riders who are applying for recertification. If the expiration is imminent, OTA extends the term of eligibility by 60 days to allow enough time for processing the recertification request.

For new applications, if a decision is pending after 21 days and the applicant inquires about the status of his or her determination, OTA reviews and processes the application that day, then contacts the applicant with the decision. If eligible, OTA enters their rider number into the system so that they can request service for the following day.

Page five of the application's cover letter informs potential applicants that they have a right to receive service if the application is not processed within 21 days, stating, "If no eligibility determination has been made within 21 days of receipt of a completed application, you will be provided THE RIDE service until a determination is made."

## Appeal Process

All OTA determination letters informing applicants that they are ineligible or have been granted limit eligibility contain information about how to request an appeal. OTA accepts appeals for 60 days following the receipt of letter. Appeals must be requested in writing and appellants are encouraged to provide reasons for the appeal, but a written response to the initial determination is not required. A three-person Appeals Board that consists of an attorney from the MBTA's Law Department, the Chairperson of the Access Advisory Committee to the MBTA (AACT) or the chairperson's designee, and a representative from the Massachusetts Rehabilitation Commission hears appeals. Policy requires decisions within 30 days of hearing the appeal. If the Appeals Board has not made a decision within 30 days, the applicant receives service until the decision is made.

OTA staff noted that they could recall only two appeals in the past 17 years and stated that the last appeal they could recall was in 2006. While they receive requests for appeals, in almost all cases the request either contains additional information and/or OTA follows up with the applicant or professionals. Most of the time the additional follow-up results in OTA's finding the applicant eligible once additional information is gathered or provided.

## 6.5 No-Show Suspension Policy

Section 37.125(h) of the DOT's 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." The review team reviewed the MBTA's policies, procedures, and practices regarding no-show suspensions as part of the assessment.

Page 6 of *THE RIDE Guide* defines a no-show as occurring "when you request a trip, receive confirmation, and then fail to cancel with at least one hour's notice to your Contractor or you fail to show up within 5 minutes after your scheduled pickup time." OTA staff indicated that they had not developed or implemented a formal no-show suspension policy.

## 6.6 Findings

1. To meet the requirements of Section 37.123(e)(3) of the DOT ADA regulations, the MBTA must revise its eligibility determination process to consider an applicant's ability to independently board, ride, and disembark from its fixed route vehicles, and travel independently to and from boarding and disembarking locations. The determination process must also consider the interaction of the applicant's disability with any architectural and/or environmental barriers such as distance, terrain, and weather that may prevent the applicant from independently traveling to or from a bus stop or rail station. Leaving out these conditions has the effect of inappropriately limiting eligibility for those applicants whose most limiting condition is this interaction. As part of the revision, the MBTA may find it necessary to revise its application form to request more information about issues related to getting to and from stops/stations and physical and environmental barriers that affect the travel of applicants and to conduct follow up with applicants and professionals named in the applications.
2. To meet the requirements of Section 37.123(e), the MBTA must ensure that the portion of the form which medical professionals are required to complete clearly indicates whether the

questions are designed to solicit information concerning cognitive abilities, physical abilities, or both. As mentioned in Finding #1, the eligibility process must consider physical and sensory skills and abilities, such as maximum walking distance and street crossing ability. Including the ability to respond with “sometimes” in addition to yes or no will help to clarify the information. Finally, providing a space for additional information will also help with application reviews, particularly if MBTA is imposing conditions on eligibility determinations.

3. To meet the requirements of Section 37.121-123 of the DOT ADA regulations, the MBTA must ensure that its eligibility determinations consider whether rail stations are accessible or inaccessible.
4. 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 and thereafter until the eligibility determination is made. Based on a sample of 26 eligibility determinations made in July 2010, the MBTA did not make any determinations within 21 days. To meet the requirements of Section 37.125(c) of the DOT ADA regulations, in those instances where eligibility determinations take more than 21 days after receipt of a complete application, the MBTA must treat applicants as eligible and provide service to them on the 22nd day and thereafter until and unless the application is denied. Developing a method for tracking application processing time is essential to granting presumptive eligibility in a timely manner. The MBTA is not permitted to wait until an applicant calls to check on the status of his or her application. Appendix D to the DOT ADA regulations explains “service may be terminated only if and when the entity denies the application.”
5. To meet the requirements of Section 37.125(g), the MBTA will be required to develop a process and procedure for tracking eligibility appeals and appeal decisions. As of the time of the review, the MBTA had no information to provide to the review team on the number of appeals requested, decisions reversed, decisions upheld, and decisions remanded to MBTA for reconsideration. Tracking this information is important in the event that a complaint is filed with MARTA and or with FTA. At the time of the review, OTA staff stated that they could recall only two appeals in the last 17 years. At the same time, staff stated that appeals are received and that OTA follows up with the applicant or the named professional on the additional information and most frequently finds the applicant eligible. FTA is concerned that MBTA and OTA RTA may have made revisions to determinations on a case by case basis only, rather than also tracking the appeals 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.
6. To meet the requirements of Section 37.125 of the DOT ADA regulations, the MBTA must ensure that its paratransit eligibility process does not pose unreasonable administrative burdens on applicants. The review team found two as described in this chapter.
  - a. The practice of encouraging applicants to prepare a written response as a precursor to obtaining the required opportunity to be heard and to present arguments and information could dissuade applicants from exercising their appeal rights and could constitute an unreasonable administrative burden. However, the MBTA may require that applicants file a notice of intent to appeal.

- b. The MBTA’s practice of returning applications with the letter containing the statement of ineligibility could dissuade people from submitting the additional information and may actually give some applicants the impression that they need to reapply for their applications to receive consideration.
7. In the event the MBTA chooses to implement its suspension policy, to meet its obligations under Section 37.125(h) of the DOT’s ADA regulations, the MBTA must specify the length of the suspension and must ensure that it is reasonable; the policy must be revised to reflect that *only no-shows under the rider’s control* will be charged against riders and only if they fail to board after the 5 minute vehicle wait time or cancel at the door *when the vehicle arrives within the pickup window*, as trips missed by system error must not be counted against passenger. The MBTA may not count those instances where the vehicle arrives outside of the pickup window and the rider elects not to board. The policy must take frequency of use into account, as the intent of the regulation is to deter or deal with chronic no shows and that sanction can only be imposed for a pattern or practice of missing scheduled trips which involves intentional repeated or regular actions by both frequent and infrequent riders and not isolated accidental or singular incidents.
8. FTA will require the MBTA to submit information clarifying whether its “met at both ends” eligibility is a type of assisted transfer or hand-to- hand transfer agreement or whether this is in fact a type of conditional eligibility, where the rider is eligible to use THE RIDE under certain conditions and is able to use the MBTA fixed route bus and rail under certain conditions.
9. FTA will require the MBTA to submit information clarifying its eligibility determination requiring travel with an attendant. Review team conversations with OTA staff suggested that travel with an attendant is only authorized when applicants need a level of supervision on the vehicle that the paratransit driver cannot provide and that this decision is reached in consultation with the applicant’s guardian. The review team’s analysis of a sample of applications suggest that in at least two cases, OTA imposed this requirement based on speculation on the need for supervision in violation of Section 37.5(e) of the DOT ADA regulations.

## 6.7 Recommendations

1. Consider revising the eligibility determination process to include some form of an in-person assessment.
2. Between July 1, 2009 and May 29, 2010, the MBTA received 12,717 applications for ADA complementary paratransit eligibility, or an average of 283 per week. Of those applications determined to be eligible, approximately 90.4 percent were determined to be unconditionally eligible. Applicants were found to be conditionally eligible 9.6 percent of the time. This is a relatively low proportion of conditionally eligible determinations compared to other transit systems that conduct more detailed reviews. The MBTA determination process should obtain a greater amount of detailed information in order to facilitate more thorough determinations that will yield a higher proportion of conditional eligibilities.
3. Track data on eligibility determination outcomes to separate incomplete applications from determinations that applicants are not eligible.

4. Based on a review of a sample of 17 applications that the MBTA deemed incomplete, team members judged that 11 of them appeared to have sufficient information to lead to finding of eligibility. The MBTA should not find applications with sufficient information to be incomplete.
5. For several of the applications deemed incomplete, the MBTA reviewers may have had some questions about the specific abilities of applicants that could have been collected by following up with the applicants or with the licensed professionals that completed part of the application. The MBTA should consider adding staff resources to the eligibility-determination function to permit those reviewing the applications to contact the applicants or, with the applicant's permission, the applicant's respective licensed professionals, in order to clarify information. For other incomplete applications, MBTA reviewers appeared to perceive inconsistencies in the responses that could be easily rectified by making a follow-up call. This follow-up would dramatically reduce the very high percentage of applications that are now being returned as incomplete because of minor inconsistencies or missing information. More staffing would also shorten the time required to process applications.
6. Providing a space for additional information will help with application reviews.
7. Follow up with applicants, guardians, and professionals as appropriate regarding the need for supervision during transport and/or at either end of their trips. Include documentation describing the nature of the need for supervision.
8. In one case, the MBTA imposed a requirement for an individual to always travel with a personal care attendant (PCA). It appears the MBTA based this decision on an overly broad interpretation of an answer by the professional to the question of whether the person could safely travel through crowded or complex MBTA facilities. The MBTA should be sure to clarify an applicant's travel requirements with the applicant, guardian, or professional.
9. Only two MBTA employees were responsible for reviewing a weekly average of 283 applications. Consider adding staff to help shorten the time required to process applications and ensure there is time to conduct follow-up as needed.

## 7 Telephone Access

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

The review team collected information about telephone access at the offices of the three contractors for THE RIDE, collecting the following information:

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

### 7.1 Consumer Comments

Two of the 11 riders contacted in advance of the site visit indicated that telephone hold times could last as long as 10 minutes, while another rider noted that it took as long as 5 minutes for a reservationist to pick up. The remaining eight riders said that wait times were reasonable. One rider commented that the phone system's automated prompts are difficult for cognitively disabled riders to operate and that she would prefer more direct access to a reservationist. Two riders offered that hold times become longer near the end of the day.

These comments were not consistent with review team observations, perhaps due to improvements to telephone access. At the time of the site visit, the automatic call routing system allows callers to speak directly to a live reservationist.

### 7.2 Phone System Standards and Performance Monitoring

The MBTA requires its contractors to keep average telephone hold times to less than 2-1/2 minutes, monitored on a monthly basis. Contractors are also required to keep the proportion of calls that remain on hold for more than 5 minutes under 5 percent of all calls. The contractors submit monthly reports to the MBTA with their telephone statistics for the month. The MBTA penalty is \$10,000 for not meeting both standards each month.

These telephone performance criteria are consistent with the DOT ADA regulations' requirement to avoid patterns and practices that would constitute a capacity constraint that might discourage some customers from using THE RIDE.

The MBTA indicated that all three contractors regularly meet the telephone standards.

### 7.3 Phone System Design

Each contractor has an independent telephone system, as described below. All three contractors use the same automated call routing menu with a recorded voice providing the menu of choices that a caller hears after dialing the contractor's telephone number. The contractors each use a single telephone number for public access. The numbers are published in *THE RIDE Guide* and

on the RIDE page of the MBTA's website along with a map indicating which contractor to call depending on the service area. If a rider's trip goes between two service areas (all three service areas include the City of Boston), the rider calls the contractor that covers the address of the trip's origin.

Each contractor utilizes an automated phone system that allows customers to check their balance; schedule, review or cancel a trip reservation; or to speak with a reservationist. Each call center has a means of displaying the number of calls in the queue so that both reservationists and supervisors are aware of any queues. The automated call routing menu identifies the contractor (e.g., "You have reached THE RIDE, operated by Veterans Transportation"), notes that the call will be recorded or may be monitored, and gives the hours for making trip reservations.

If the caller remains on the line, he or she receives the following primary and secondary choices:

- For assistance with a trip for today, press 1
  - To get "where's my ride?" information using the automated system, enter RIDE ID
- To book a trip for a future date or if you need account information, press 2
- To get account information from the automated system, press 1 or say "account balance"
- To book a trip using the automated system, press 2 or say "book a trip"
- Press 3 to review or cancel your trips
  - To review or cancel scheduled trips for today, press 1 or say "scheduled trips"
  - To review or cancel future trip requests, press 2 or say "requested trips"
- To speak with an agent at any time, press 0

When all call-takers are occupied, a recorded message asks the customer to wait for the next available representative.

The system at Greater Lynn Senior Services (GLSS) is the same, except that before presenting other options, it invites the caller to press 1 to use the automated system to check a ride or to cancel, confirm, or book a ride, or press 0 to speak with a reservationist (customer service representative). If the GLSS customer presses 1, the menu of choices is as described above.

By providing riders with the ability to check their balances (the debit account for paying fares) and make reservations, the automated system reduces the load on the call center and improves service for those riders who wish to speak to a reservationist for these purposes.

If a rider chooses to enter his or her RIDE ID to use the automated options, the rider can check his or her balance, reserve or cancel a trip, or check on a ride without the assistance of a reservationist. In order to set up automatic trip requests, riders are asked to provide the necessary information on their trip origins and destinations, whether they need a PCA and/or use a mobility aid.

Table 7.1 summarizes the phone systems for all three contractors. For all three contractors, the number of telephone lines is adequate to minimize call-waiting times.

All three contractors use an automated callback system that places calls each evening with riders' pickup times for the following day. The automatic callback is made after the close of reservations. In the event that the pickup time is incorrect – i.e., either more than an hour before or after the passenger's requested pickup time or completely inaccurate – the passenger has little

opportunity to correct the error, or to negotiate a more acceptable pickup time. This violates Section 37.131(b)(2) of the DOT ADA regulations, which prohibits requiring the individual to schedule a trip to begin more than one hour before or after his or her desired departure time. Under Section 37.131(b)(2), the MBTA must schedule and provide paratransit service to any ADA paratransit eligible person at any requested time on a particular day in response to a request for service made the previous day. Consequently, the passenger must be provided the opportunity to adjust their pickup time on the day before the requested service.

Callbacks do not begin until after the reservations hours (8:30 a.m. to 5 p.m.), so there is no additional demand on the telephone system due to callbacks.

**Table 7.1 – Telephone System Characteristics**

	VTS		GLSS		JV	
Number of phone lines	15		16		46	
Peak call center staffing	12 <sup>1</sup>		13		12	
Average reservations call volume (approximate)	Weekday	Weekend	Weekday	Weekend	Weekday	Weekend
	1,100	700	1,500	400	1,200	750
Call distribution system	inDepth		ShoreTel		Avaya IP Office	
Dispatch lines	10 <sup>2</sup>		8		5	

1 – 10 full-time and 2 part-time

2 – Reservations lines can overflow to dispatch

### **Veterans Transportation Service (VTS)**

Calls to VTS are distributed by NEC inDepth automated call distribution and management information software. There are 15 phone lines in the call center, which has 12 reservationist workstations, and 12 lines in the dispatch center, which has 10 dispatch workstations. VTS has five workstations in the dispatch center that are staffed to handle “where’s my ride?” (WMR) calls but can also book reservations when all reservationists are busy. The telephone system allows reservations calls to overflow to these dispatch lines, reducing customer waiting times. In both the call center and dispatch center, wall-mounted displays indicate the number of calls in the queue, which encourages reservationists and dispatch staff to answer waiting calls more quickly than they might if they were unaware of the queue length.

At the time of the on-site review, VTS daily reservations call volumes were approximately 1,100 on weekdays and 700 on weekends.

### **Greater Lynn Senior Services (GLSS)**

The phone system at GLSS has 16 lines for the 13 call center stations, and eight lines for the dispatch center, which has 10 dispatchers. Calls are distributed by ShoreTel software. The call center workstation displays include an indicator of the number of calls in the queue. WMR calls are routed directly to the dispatch lines, but reservations calls do not overflow to dispatch.

GLSS daily reservations call volumes were approximately 1,500 on weekdays and 400 on weekends

### **Joint Venture (JV)**

The phone system at JV uses Avaya IP Office software to distribute calls. It has 46 digital lines and 12 analog lines for incoming and outgoing calls, including one TTY line. There are 11

reservationist and dispatch stations and JV indicated that another reservations station could be added if necessary. A wall-mounted display shows the number of calls in the queue.

JV daily reservations call volumes were approximately 1,200 on weekdays and 750 on weekends.

## **7.4 Reservations and Dispatch Staffing**

### **Veterans Transportation Service (VTS)**

At VTS the reservationists arrive shortly before 8:30 a.m. (the beginning of the reservations period) and are on duty until 5 p.m. or until the queue is cleared. No live reservations calls are accepted after 5 p.m. Schedules and breaks are arranged to maintain phone coverage of 10–12 reservationists at all times; this includes two part-time reservationists, one working in the morning and one in the afternoon. On Saturdays and Sundays, the staffing is seven to eight reservationists at all times during the reservations hours, which are the same as on weekdays.

Five dispatch assistants directly accept WMR calls handle reservations overflow calls.

### **Greater Lynn Senior Services (GLSS)**

At GLSS, the call center staffing is 11–13 reservationists on duty during the reservations hours and longer if there calls remain in the queue after 5 p.m. GLSS does not use dispatch assistants, so in addition to reservations, the call center accepts live calls for cancellations and WMR inquiries. One CSR works a shift beginning at 6 a.m. for this purpose, and there are two reservationists accepting calls until 8 p.m. and one reservationist on duty until 10 p.m. After that, all calls are routed directly to the dispatchers. The GLSS call center supervisor said that during periods when call volumes are low, two reservationists work on entering trip requests received through the GLSS web page, which is linked to THE RIDE web page.

### **Joint Venture (JV)**

At JV, weekday staffing at the call center was 11 reservationists at the time of review. Due to a vacant staff position, one station was not staffed. Weekend staffing is eight reservationists on Saturdays and seven on Sundays. Like GLSS, WMR calls are routed through the call center. JV handles calls before 8:30 a.m. and after 5 p.m.

## **7.5 Observations of the Call-Handling Process**

The review team observed the reservations process and dispatch areas for several hours at VTS on Tuesday July 20, 2010, and at GLSS and JV on Thursday July 22, 2010.

In general, reservationists answered calls without significant delay in all call centers during the observation period. Queue displays mounted high on the wall of the VTS and JV call centers and on the reservations screens at GLSS generally indicated no more than two calls in the queue, and these queues were consistently cleared in less than two minutes.

The review team observed very efficient handling of calls in the dispatch area. At VTS, dispatch assistants had workstations with the dispatch software running and were able to handle WMR calls without the assistance of a dispatcher. Dispatchers at all three contractors could also monitor the dispatch queue.

## 7.6 Telephone Performance Reports

The contractors' telephone systems each generate a variety of performance reports. Attachment G presents examples of the performance reports. These reports are designed to enable the call center supervisor to monitor reservationist productivity (number of calls accepted and duration of calls) as well as to display average telephone hold times in order to monitor adherence to the MBTA telephone performance standards.

The contractors' reports differ in a number of respects, including the time intervals used. VTS reports cover 60-minute intervals, GLSS reports cover 30-minute intervals, and JV reports cover 15-minute intervals. Only JV's Avaya system was capable of creating a report that explicitly showed the number of calls with hold times greater than 5 minutes. The VTS and GLSS systems show average wait times and maximum wait times by time interval, but do not provide information that could be used to determine precisely what percentage of hold times exceeded 5 minutes. However, because the wait times at all three contractors were very short on average, it is likely that all contractors are meeting the MBTA's contractual standard for calls on hold more than 5 minutes.

Table 7.2 summarizes the telephone system performance for the week of Sunday, April 25, through Saturday, May 1, 2010. As shown, all three contractors demonstrated very good telephone performance for the selected week. The average call wait time, including hours outside the 8:30 a.m. to 5 p.m. reservations hours, was very low. Over the week in question, there were only seven time intervals when the average wait time exceeded 2 minutes, and the longest half-hour average wait time in these periods was under 1 minute for VTS and under 3 minutes for GLSS and JV. Based on these observations, it appears telephone access is good for all three contractors and there is no capacity constraint.

**Table 7.2 – Telephone System Performance, Reservations Calls, April 25–May 1, 2010**

	<b>VTS</b>	<b>GLSS</b>	<b>JV</b>
Average call wait time for the week, all hours (min:sec)	0:15	1:17	0:45
Number of hours in which average wait time exceeded 2 minutes	0	4	3
Longest average wait time in a half-hour period, 8:30 a.m. to 5 p.m. (min:sec)	0:54	2:46	2:48

## 7.7 Findings

1. Section 37.131(b)(2) of the DOT ADA regulations permits transit systems to negotiate pickup times with paratransit passengers but prohibits requiring the individual to schedule a trip to begin more than one hour before or after his or her desired departure time. Page five of *THE RIDE Guide* states, "After the close of reservations, trips for the following day are scheduled." Eligible individuals reserving a trip on The RIDE are not provided with a pickup time until the evening before the scheduled trip, and notification is via an automated call. In the event that the pickup time is incorrect – i.e., either more than an hour before or after the passenger's requested pickup time or completely inaccurate – the passenger has little

opportunity to correct the error, or to negotiate a more acceptable pickup time within the 120-minute timeframe surrounding the passenger's original request. For example, if a passenger wishes to travel at 8:00 a.m., and the automated call informs the passenger that his or her pickup time will be 8:45 a.m., the passenger has no opportunity to negotiate for a 7:15 pickup if that would better serve his or her travel needs. Under Section 37.131(b)(2), the MBTA must schedule and provide paratransit service to any ADA paratransit eligible person at any requested time on a particular day in response to a request for service made the previous day. Consequently, the passenger must be provided the opportunity to adjust their pickup time on the day before the requested service.

## **7.8 Recommendations**

1. The MBTA may consider standardizing the reporting formats for telephone performance for all three contractors so that it can determine the percent of calls on hold more than 5 minutes.

## 8 Reservations

DOT ADA regulations require that a public entity must accept reservations and schedule and provide trips made the day before (§ 37.131(b)). Reservations must be accepted during normal business hours, including those days that the agency does not provide service (e.g., trip requests must be accepted on Sunday for a trip on the following day). Section 37.131(b) also allows a transit agency to negotiate pickup times up to one hour before or after the time requested by riders.

Section 37.133 of the DOT ADA regulations governs subscription trips (i.e., pre-arranged trips at a particular time not requiring individual trip reservations for each trip). Such trips may not comprise more than 50 percent of the available trips at any given time if there is a capacity constraint at that time of day. If there is no capacity constraint, there is no limit to subscription service.

The review team examined how the MBTA handled trip requests from THE RIDE passengers. Particular attention was paid to policies regarding trip reservations and negotiation of trip times, whether THE RIDE uses any form of trip caps or waiting lists. In addition, the review team researched whether there was a pattern or practice of denying a significant number of ADA-eligible trip requests. The review team gathered and analyzed the following information:

- Input from riders and advocates through telephone interviews, and through a review of comments and complaints on file at the MBTA
- Reservations policies and performance standards
- Service reports showing the number of trips served and the number of trips denied for the past three years
- Review team observations of the handling of trips by review team members, and interviews with MBTA staff about the ability to accommodate trip requests

### 8.1 Consumer Comments

None of the 11 interviewed riders reported any issues with trip denials, waiting lists, or trip caps. Most of the riders offered similar accounts of the trip-notification process; they usually receive a call from the contractor the night before the trip between 6 and 9 p.m. with the promised pickup time for all trips scheduled for the following day

### 8.2 Standards, Policies and Procedures

#### Response Time

The MBTA's website and *THE RIDE Guide* publish three toll-free telephone numbers for reservations, one for each contractor. TTY numbers for each contractor are also provided. Since the service area is divided into three zones, a map and a list of the towns served by each contractor appear on the same page of the Guide and the website. Riders who live in the city of Boston may call any contractor (in practice, Boston riders tend to use the contractor nearest to them, e.g., those living in Boston's southern neighborhoods tend to use JV).

Riders can make reservations for trips on THE RIDE any day of the year from 8:30 a.m. to 5 p.m. and trips may be booked from 1 to 14 days in advance. Same-day trip requests are

accepted and forwarded to dispatchers, who try to accommodate the request, but there is no guarantee for fulfilling same-day requests.

*THE RIDE Guide* states:

You may review or change any trip in the fourteen-day period up to 5 p.m. on the day before service by calling your Contractor. After the close of reservations, trips for the following day are scheduled. Schedules are created to share rides for riders traveling similar routes. Request times may be adjusted to allow riders to share the ride.

Requests for same-day trips, or requests for next-day trips after 5 p.m., can be placed through your Contractor's dispatcher. Although these requests cannot be guaranteed, it is often possible to provide the service.

THE RIDE appears to be in compliance with the requirements for response time.

## Subscription Service

Section 37.133 of the DOT ADA regulations allows subscription trips, i.e., pre-arranged trips at a particular time not requiring individual trip reservations for each trip. Such trips may not comprise more than 50 percent of the available trips at any given time if there is a capacity constraint at that time of day. If there is no capacity constraint, there is no limit to subscription service.

The MBTA offers subscription service to riders who repeat the same trip at the same time several times per week. There is an inconsistency among the contractors. VTS and JV require that the rider make the trip at least three days a week, while GLSS requires that subscription trips occur as little as one day a week, e.g., Sunday trips to church services. This is not an ADA compliance issue, but the MBTA may wish to standardize the policy for all three contractors to prevent confusion to riders.

## 8.3 Service Reports

The MBTA provided service statistics for FY 2010. It reported that of 2.6 million trip requests, two (2) trips were unavailable, i.e., denials. For FY 2009 and FY 2008, which had a similar numbers of trip requests, there were no reported denials. According to the MBTA staff, no denials resulted from trips being negotiated outside the allowable window of 60 minutes before or after the requested time.

All three contractors use the term "promised time" on the driver manifests to indicate the scheduled pickup time that was given to the rider in callbacks, which are described below. They do not use the term "negotiated time," in part because the reservations system does not offer the caller a time during the original reservation call.

Data provided by the MBTA on GLSS operations for the week of April 25–May 1, 2010 indicated that no scheduled pickups differed from requested pickup times by more than 60 minutes, only two out of 1935 trips were scheduled more than 30 minutes from the requested time, and over 80 percent of the trips were scheduled no more than 10 minutes from the requested time. For JV, one trip out of 11,230 trips scheduled differed by more than 60 minutes from the requested time, but over 80 percent of trips were scheduled within 10 minutes of the requested time, and very few trips differed by more than 30 minutes from the requested time. Scheduled pickup times were not available for VTS.

A GLSS dataset of trips for the week included a column labeled “Rq Time/ Pr Time” (i.e., Requested Time/Promised Time), indicating that GLSS considered requested and promised pickup times to be identical, even though there was some difference between requested and schedule times as noted above. Together, this reported information, as well as the review team observations described below, suggest that no negotiations or scheduling outside the allowable window were occurring, as stated by the MBTA. However, as described below, no negotiation of any kind was in general occurring because of the nature of the reservations process used by THE RIDE contractors.

## 8.4 Observations of the Handling of Trip Requests

Table 8.1 summarizes the review team’s observations of the reservations process at all three contractors’ call centers. This included more than 13 hours of observations consisting of 140 reservations calls and 126 other calls (e.g., trip confirmations, cancellations, or “Where’s my ride?” calls). During the 140 reservations calls, customers made 330 trip requests.

**Table 8.1 – Summary of Trip Request Observations**

Date	Contractor	Observation Period			Reservations Calls		Other Calls
		Begin	End	Total (Hr:Min)	Calls	Trips Requested	
20-Jul	VTS	9:07	10:00	0:53	31	64	28
20-Jul	VTS	9:07	9:55	0:48	8	15	12
20-Jul	VTS	15:10	17:00	1:50	18	64	16
22-Jul	GLSS	9:10	10:00	0:50	6	10	5
22-Jul	GLSS	14:40	17:00	2:20	19	38	11
22-Jul	GLSS	9:30	10:15	0:45	8	16	10
22-Jul	JV	10:50	11:15	0:25	1	2	1
22-Jul	JV	8:30	10:30	2:00	13	33	12
22-Jul	JV	16:00	17:00	1:00	10	19	9
22-Jul	JV	9:15	10:32	1:17	11	33	8
22-Jul	JV	15:47	16:55	1:08	15	36	14
<b>Total</b>				<b>13:16</b>	<b>140</b>	<b>330</b>	<b>126</b>

All three contractors use Stratagen ADEPT software to book reservations and schedule trips. The reservations procedures are very similar at each site. Upon taking the call, the reservationist:

- Greets the caller, who may be a rider or someone calling on a rider’s behalf.
- Asks if the caller is making a reservation and request the rider’s RIDE identification number.
- Asks the rider’s name to confirm who the trip is for. The software displays the rider’s home address.
- Checks the rider’s account balance and gives the caller the balance if it is low or insufficient for the trip.
- Asks what day the reservation is for. The software displays the rider’s trips that have been already booked for that day.
- Asks for the pickup address.

- Asks for the destination address. The software allows the reservationist to look up addresses and to see the addresses used in the rider's previous trips; this reduces the chance of incorrectly entering an address.
- Based on the destination, asks if the rider is going to an appointment (e.g., a medical office building).
- If the trip is appointment-driven, selects "appointment" to anchor the trip at the drop-off end. If it is not appointment driven, select "pickup" to anchor the trip at the origin end.
- Asks the caller what mobility aids or service animal, if any, the rider will use, and whether they will travel alone, with a PCA, and/or a companion.
- If a child will accompany the rider, the reservationist types "booster seat" or "child seat" in the address field so the scheduler will be sure to assign the trip to a vehicle with the correct equipment.
- Confirms information on file that is displayed on the reservations screen indicating whether the rider usually uses a mobility aid and/or travels with a PCA. (This practice was not followed in all observations.)
- Once the outgoing trip is reserved, saves the trip and ask if there will be a return trip.
- If yes, enters the requested pickup time and destination for the return trip (or additional legs of a multi-leg trip). The software default is to use the going trip origin as the destination for the return trip.
- If the caller is unsure of the time of a return trip, enters the trip as a will-call trip and tells the passenger to call for the return pickup when they are ready.
- Ends the call by confirming the trip details and telling the customer that they will receive a callback on the evening before their trip giving the pickup time for all trips on that day.

Trips on THE RIDE are not assigned to runs or scheduled while the caller is on the phone; instead, all trips are saved for subsequent scheduling. As noted above, the great majority of trips are scheduled within 10 minutes of the requested pickup time, or, for drop-off-anchored trips, trips are scheduled during the 30-minute window prior to the requested appointment time.

If a trip requires a transfer to another contractor's vehicle (which is the case for destinations that are more than one town into the adjoining service area), the reservationist books both ends of the trip, tells the caller where the transfer will occur, and logs the transfer trip on paper. The lists of transfer trips to each of the other contractors are exchanged between the contractors by fax at the end of the day.

The review team observed reservationists to be professional, efficient, and courteous. Most reservationists confirmed all trip details (except pickup times), although some did not confirm the information contained in the rider's record regarding the rider's use of mobility aids and personal care attendant.

## Negotiations and Denials

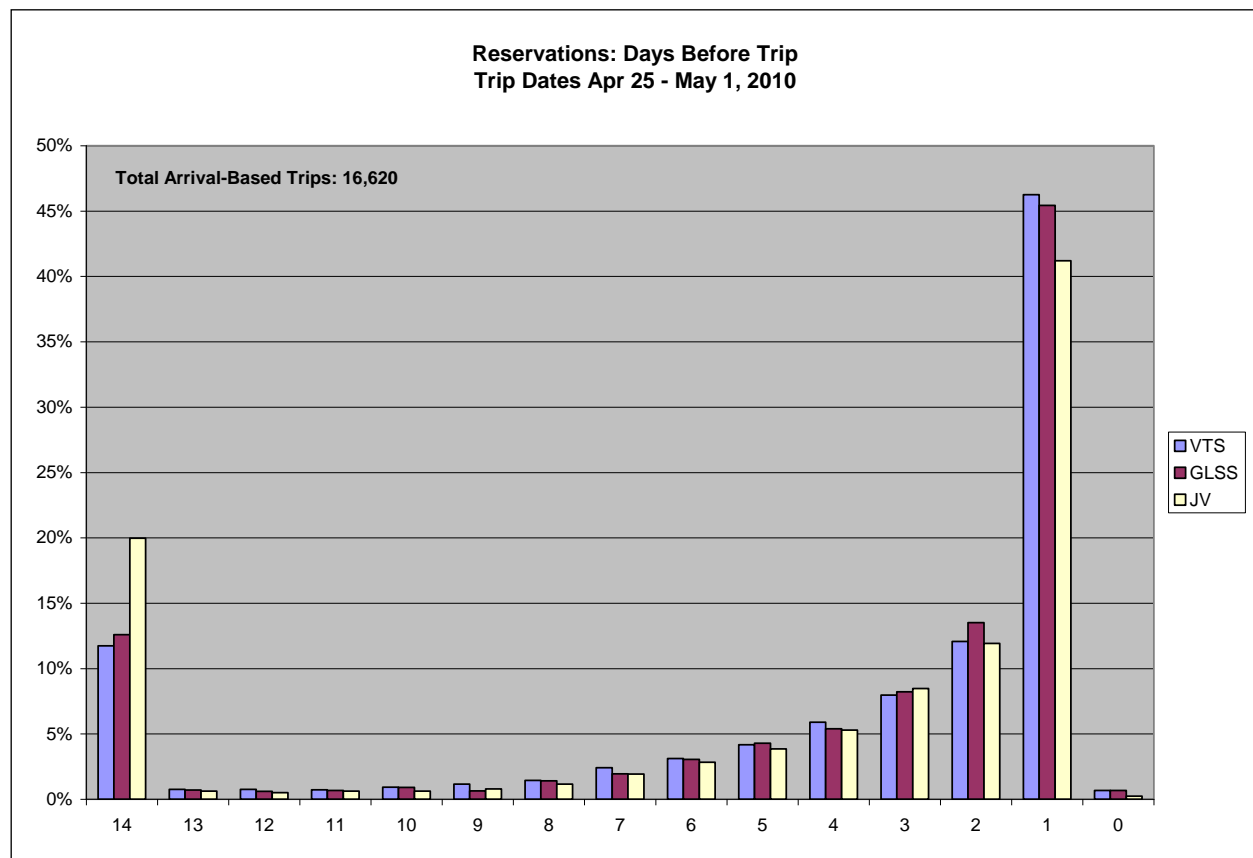
The review team did not observe any negotiations because the reservationists enter the requested trip times into the ADEPT system, with no negotiation taking place during the call. At all three contractor sites, the reservationists told each customer that they would receive a callback on the day before the trip with the exact time of their pickup for trips scheduled for the following day.

As noted above, for the two contractors whose reported trip data included both scheduled and requested times, only one trip ended up being scheduled more than 60 minutes from the requested time.

## Reservation Lead Times

Using MBTA data for the week of April 25—May 1, 2010, the review team compared the date of the trip with the date the reservation was created (excluding subscription trips). Figure 8.1 shows the distribution of how many days in advance of the travel day customers called to book the trip.

**Figure 8.1 – Distribution of Calls by the Number of Days in Advance of the Trip**



Over 40 percent of the reservations were made one day prior to the trip and relatively few trips were booked far in advance, except for the 10–20 percent of the reservations made as soon as the 14-day booking period opened. This pattern suggests that most customers are confident that they do not need to book trips well in advance in order to get the trip time they wish. Reservations made as soon as the 14-day booking window begins reflect the commonly seen practice of some customers wishing to reserve their trips as soon as it is possible to do so.

## 8.5 Trip Confirmations

THE RIDE uses automated callbacks to inform the rider of the pickup time for the next day's trips. The MBTA requires callbacks to take place 6:30–9 p.m. As noted above, very few trips are scheduled more than 30 minutes from the requested pickup time, so negotiation is not often

needed by riders when they receive their callbacks. If a rider objects to the offered pickup time, he or she may call the all-purpose THE RIDE telephone number, direct the call to the dispatcher, and negotiate the trip time with a dispatcher. Although this is not often necessary because scheduled times are within 10 minutes of the requested time for the great majority of trips, the ability of the rider to easily object to an offered time and attempt to negotiate a more suitable time is essential to comply with the DOT ADA regulations.

## 8.6 Recommendations

1. The MBTA should consider implementing a feature in the automated callbacks—such as an option to connect directly to a dispatcher—that makes it easy for customers who object to the pickup time that is offered to attempt to have the time adjusted.
2. MBTA should have its contractors monitor their reservationists to ensure that they are consistently confirming all trip details with riders at the conclusion of their calls.
3. The MBTA should standardize the policy among all three contractors regarding how often a rider must take a trip in order to gain subscription service (i.e., setting the threshold at one trip per week as GLSS currently does).

## 9 Service Performance

Section 27.133(f) of the DOT ADA regulations for ADA complementary paratransit service prohibit capacity constraints—including missed trips, a substantial number of untimely trips, and excessively long rides—and other operational practices that limit the availability of service to paratransit eligible riders. Consequently, the review team examined on-time performance, missed trips and no-shows, and on-board travel times for THE RIDE.

To assess service quality, the review team:

- Obtained consumer comments regarding on-time performance and travel times and a review of complaints filed with the MBTA
- Reviewed THE RIDE’s relevant service policies, procedures, and standards
- Observed THE RIDE’s scheduling and dispatch functions and interviewed the appropriate staff
- Interviewed drivers about schedules provided and dispatch support received
- Reviewed THE RIDE’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 determine average trip length
- Compared travel times of ADA complementary paratransit trips with those of comparable fixed route trips

### 9.1 Consumer Comments

Two of the 11 interviewed riders said that late pickups were sometimes an issue. Another rider commented that drivers typically arrive from 30 minutes early to 30 minutes late. Seven of the riders said that drivers often arrive within the pickup window or nearly on time. Two riders offered that on-time performance has improved since new contracts started in July 2009.

All of these riders reported experiencing rides longer than one hour, mostly when the trip occurred in the afternoon during periods of traffic congestion or when the trip involved a transfer to another contractor. None of the riders suggested that long rides are a frequent problem.

When asked whether drivers know how to reach the destination, most riders said they offer the drivers advice and shortcuts. Many of these riders assume that drivers typically have little experience with THE RIDE service, and that the on-board GPS systems are not always accurate.

### 9.2 Service Standards and Policies

#### On-Time Performance Policies and Standards

The MBTA has a pickup window of -5/+15 minutes for RIDE pickups. The drop-off window is +10 minutes (no early threshold).

The performance standard for each contractor on a monthly basis is 90 percent of all trips on time on both ends, i.e., neither a late pickup nor a late drop-off. The MBTA imposes a fine each month on a contractor of \$30 per late trip beyond 10 percent.

## No-Show and Missed Trip Definitions and Performance Standards

The MBTA considers any cancellation less than 1 hour before the negotiated pickup time as a passenger no-show. At the time of the site visit, MBTA had not developed a policy for no-show suspensions.

According to *THE RIDE Guide*, a missed trip by a carrier is “a late arrival at the pickup location where the customer is not found or elects to cancel-at-door; in either case, the trip is not made.” A late arrival is greater than 30 minutes after the negotiated pickup time (not 10 minutes, which is the end of the pickup window). If the vehicle arrives more than 10 minutes but fewer than 30 minutes after the negotiated pickup time, the MBTA does not consider this as a missed trip. As well, if the rider chooses to take the trip even when the vehicle arrives more than 30 minutes after the negotiated pickup time, the MBTA does not consider this as a missed trip.

The MBTA imposes a fine of \$60 for each missed trip.

## Travel Time Policies and Standards

For trips that would have a direct ride time up to 30 minutes, the maximum allowed travel time on THE RIDE is 60 minutes. For trips that would have a direct ride time greater than 30 minutes, the maximum allowed travel time on THE RIDE is two times the direct ride time. The performance standard for each contractor on a monthly basis is 98 percent of all trips with a travel time 60 minutes or less.

The MBTA may impose a fine of \$10,000 on a contractor for not meeting this standard during a month.

For trips involving a transfer between two RIDE contractors, this travel time standard applies to each leg of the trip.

## Securement Policy

The MBTA requires THE RIDE passengers who use a wheelchair or scooter to use a “body belt” as a condition of service. Page 7 of *THE RIDE Guide* states, “If you are a wheelchair or scooter user, the driver will apply the MBTA supplied body belt immediately upon greeting you.” The DOT ADA regulations at 49 C.F.R. § 37.165(c)(3) authorize MBTA to require passengers to permit their wheelchair to be secured but do not permit requirements for additional securement of their person.

## 9.3 Scheduling and Dispatching Procedures and Observations

### Scheduling Procedures

The review team interviewed lead schedulers and dispatchers and observed the dispatch process at each contractor location. The schedulers manage the batch-scheduling process and the development of final runs after the reservations process is complete so that the system-managed callbacks can take place. Variations among the contractors are described below.

### Veterans Transportation Service (VTS)

VTS employs three full-time schedulers. Two work Sundays through Thursdays from 10 a.m. to 7 p.m. The third works weekdays from 10 a.m. to 7 p.m. One of the schedulers also works overtime on Saturdays from 11 a.m. to 7 p.m. This work schedule provides two full-time schedulers on Sundays (when Monday schedules are being developed), three on Mondays through Thursdays (when the schedules for Tuesdays through Fridays are being created) and one full-time scheduler on Fridays and Saturdays (when schedules for Saturdays and Sundays are being developed).

The scheduling staff has been very stable. A review of personnel records indicated no turnover among schedulers for the 12-month period prior to the on-site review.

The lead scheduler noted that the ADEPT system automatically opens each day for scheduling. When each day opens, ADEPT automatically adds subscription trips for that day.

The process of creating schedules for the following day begins with a review of the trips that are already in the system. Then the lead scheduler obtains the final list of available drivers and driver assignments for the following day. There are two lists of drivers: one for vans and one for sedans. The scheduler enters this information into ADEPT.

Next, the scheduler runs several routines to double-check the accuracy and appropriateness of the trips that have been booked and are in the system for the following day, including:

- A check of trips with similar addresses and times to make sure that trips have not been double-booked. If there are issues with possible double-bookings, schedulers listen to telephone recordings to clarify the issues.
- A check of the accuracy of the geocoding of trips to make sure that they have been coded appropriately.
- A check of all transfer trips to make sure that all trips going to the transfer locations have been booked based on a drop-off time and all return trips from transfer locations have been booked based on a pickup time.
- A check of all out-of-area trips to make sure that they have been booked in accordance with MBTA policies.

Next, the lead scheduler manually creates schedules within service quality parameters. The lead scheduler stated that experience indicates that it is best for both productivity and service quality to keep vehicles in primary service zones to the maximum extent possible. This helps direct the software to select vehicles that are nearby rather than sending vehicles all over the service area. It also helps to keep drivers in areas they know for as many of their trips as possible. To achieve this, VTS uses an affinity zone number feature in the ADEPT software to assign each vehicle to a primary zone or series of zones. VTS has created seven zones for the Northwest service area as follows:

- Zones 1 and 2: Lexington, Burlington, Bedford, Concord and Woburn
- Zone 3: Cambridge, Somerville, Medford, Malden, Everett, Winthrop and Chelsea
- Zone 4: Boston
- Zone 5: Dorchester, Roxbury and Jamaica Plain
- Zone 6: Newton, Allston and Brookline

- Zone 7: Brookline, Allston and Brighton

The schedulers assign each vehicle an affinity number for each zone. For example, if the schedulers want the system to keep a vehicle in Zone 3, they give that vehicle an affinity number of 10 for Zone 3 and 0 for all other zones. If they want to have a vehicle primarily in Zone 3, but also make it available to do trips in Boston, they might give it a 7 for Zone 3 and a 5 for Zone 4. If they want a vehicle to be able to be used throughout the area, they might assign it a similar affinity number for each of the seven zones.

Once the trips are checked, the schedulers move the trips to a test database that allows schedulers to adjust affinity numbers and run preliminary batches to see how many trips the planned runs can accommodate and to see the potential vehicle productivities (trips per vehicle hour). Having the trips on a separate test database allows schedulers to fine tune the settings without affecting the standard settings. They adjust affinity codes based on the number of drivers available and the total number of trips requested for the day.

Before running the preliminary test batches on trips in the test database, schedulers identify and manually schedule known group trips. This ensures that these trips are grouped together in the most efficient way. Once they group these trips, their respective pickup times are locked and the trips are locked on specific runs. Schedulers also identify, manually schedule, and lock in any requested trips that are very long.

Finally, schedulers manually schedule all trips where children who require car seats will be riding. This ensures that these trips are assigned to vehicles that have car seats available (since the MBTA requires its contractors to provide the seats).

Once the schedulers complete the initial manual scheduling on group trips, long trips, and trips involving children, the schedulers begin running test batches and adjusting affinity numbers to get the best possible set of schedules. During this process, they can determine if they need more drivers and then call the operations staff to request additional drivers.

Once the adjustments and testing produce the best set of schedules, they run the real batch process, after which some trips remain unscheduled. The schedulers work to manually schedule as many of these trips as possible. In the final stage, schedulers identify about 250 trips per day that do not group well or fall out of the batch process as unscheduled. VTS also uses taxis to serve certain unscheduled trips in Newton, Allston, and Brookline. Taxis are arranged through Veterans Taxi (owned by the same company as VTS and garaged at an adjacent site).

Trip requests for the next day continue until 5 p.m. The MBTA requires that callbacks start at 6:15 p.m. each day. This leaves 75 minutes for the scheduling team to run as many scenarios as possible, perform the final scheduling routines, and prepare the final set of schedules. This timeframe was compressed when the MBTA extended reservation hours to from 4:30 to 5 p.m.

VTS does not schedule any traditional spare (“extraboard”) drivers who are available to cover for drivers who are out. Instead, VTS schedules drivers and runs that begin their respective shifts without any assigned trips (“floaters”) that VTS places in service whether or not any drivers have unexpectedly not reported for duty (“callouts”). If all drivers report for duty as planned, the floater runs become extra capacity to handle other same-day issues. If there are driver callouts, the floaters cover trips from those runs. The lead scheduler indicated that VTS schedules 16 floater drivers and runs each weekday. One floater driver starts at 5 a.m. and the rest start at

6 a.m. VTS does not schedule any floaters in the afternoon. If there are unscheduled callouts in the afternoon, dispatchers ask drivers to work overtime.

The reservations staff manages subscription trips. VTS managers indicated that there is no waiting list for subscription. If a trip meets the criteria for subscription—at least three times per week to the same addresses at the same time—and the rider asks for it to be a subscription trip, VTS place these trips in the system as subscription trips.

The review team verified key scheduling parameter settings in the ADEPT system at VTS. The drop-off window is set with an early drop-off of 30 minutes before the appointment time and a late drop-off of 10 minutes before the appointment time. The system is set to alert dispatchers if drop-offs will be fewer than 10 minutes before the appointment time. This then allows the dispatcher an extra 10 minutes to ensure that drop-offs occur on or before the appointment time. The review team verified that the scheduling window is set to  $\pm 30$  minutes.

The ADEPT system uses Ride Time Factors parameter settings to determine appropriate on-board travel times for trips. VTS has the system set to allow an on-board travel time that is 30 minutes longer than the estimated direct travel time (the time to make the trip, without making any other stops along the way), regardless of the direct travel time. For example, if a trip takes 10 minutes to make without any other stops, ADEPT allows a travel time of up to 40 minutes; if a trip takes 90 minutes to directly make, ADEPT allows a travel time up to 120 minutes.

Table 9.1 shows the peak sedan, van, and total runs at VTS by day.

**Table 9.1 – VTS Average Peak Scheduled Runs by Day, July 2010**

Day	Peak Sedan Runs	Peak Van Runs	Total Peak Runs
Monday	112	99	211
Tuesday	122	108	230
Wednesday	131	107	238
Thursday	120	107	227
Friday	120	107	227
Saturday	59	57	116
Sunday	58	47	105

### **Greater Lynn Senior Services (GLSS)**

GLSS employed three schedulers at the time of the review. One worked Sundays through Fridays from 10:30 a.m. to 7 p.m. A second worked Mondays through Thursdays from 9:30 a.m. to 6 p.m. The third worked weekdays from 8 a.m. to 4:30 p.m. This level of staffing allowed for three schedulers from Monday through Thursday, when they are creating schedules for Tuesday through Friday. It allowed for two schedulers on Friday when they are creating schedules for Saturday. This level of staffing did not include any schedulers on Saturday and only one scheduler on Sundays. The unit supervisor assists on Sundays and the supervisor and a customer service employee report on Saturdays to prepare the schedules for Sunday. At the time of the review, GLSS indicated that it planned to add another scheduler to help with weekend coverage.

The schedulers split work between trips on north of Boston versus trips in Boston or to and from Boston. One scheduler focuses on trips in Boston. The others handle trips in the north service area.

A review of personnel records showed no turnover in the scheduling staff for the 12-month period prior to the on-site review.

Prior to running the batch scheduling routine each day, GLSS schedulers manually assign trips going just beyond the GLSS service area into the VTS area. GLSS provides these trips directly rather than to arrange a transfer.

Next, the schedulers manually schedule several types of trips, including long trips, group subscription trips, trips with common destinations, transfer trips involving other service providers, trips in the shared Boston service zone, and passengers that have been approved for sedan only service. GLSS has found manually scheduling these trips to be more efficient than using the automated system. Once manually scheduled, the schedulers lock these trips onto runs to prevent them from moving when they subsequently run the batch.

They then perform the batch scheduling routine shortly after 5 p.m. each day. The batch assigns as many remaining trips as possible to runs. If there are many unscheduled trips after the batch is run for the first time, schedulers arrange to have some additional drivers work the following day on overtime. Runs for these drivers are added to the system and the batch is then run a second time. Typically, some trips still remain unscheduled even after the second batch is run. Schedulers then work to manually schedule as many of these as possible.

Schedulers noted that typically only about 10–40 trips remain unscheduled after running the second batch with extra drivers. On very busy days, there may be 50 unscheduled trips after the scheduling process is completed. None of the unscheduled trips are early morning trips. Schedulers make sure that they have assigned all early morning trips to runs.

GLSS schedulers then provide a list each day to the dispatchers' office that shows all of the trips that require booster seats. Arrangements are then made at pullout and by dispatchers to ensure that booster seats are on the vehicles that have these trips.

GLSS also uses the zonal affinity settings available in the ADEPT system to target certain vehicles to certain parts of the service area. GLSS has also created seven zones as follows:

- Zone 1: core area
- Zone 2: northeast part of the GLSS service area
- Zone 3: northwest part of the GLSS service area
- Zone 4: “rivers” area (mainly Revere)
- Zone 5: Boston
- Zone 6: southern part of the GLSS service area
- Zone 7: western part of the GLSS service area

Schedulers periodically review and make adjustments to the affinity settings to improve performance. After running the batch, schedulers manually scan all of the runs to make sure that the final schedules are reasonable and that trips have not been scheduled too close together. They then refine the schedules as needed.

During the day, in addition to preparing the trip database for the batch scheduling process, schedulers work on transfer trips. They assist the dispatchers by closely monitoring these trips, making adjustments as needed, and communicating with the other service providers.

Schedulers noted that they hold out two to three runs in the morning for dispatchers to have available as spare or “floater” runs. In the afternoon there are no floater runs. Dispatchers rely on morning drivers to work extra time in the afternoon if there is the need for additional capacity.

Two reservationists handle subscription trips and noted that if they receive a request for subscription service, they fill out a form, check to see if the trip qualifies, and then enter the request in the system. They do not need to clear new subscription requests with schedulers and they noted that there is no waiting list for subscription trips. GLSS accepts subscription requests for trips made one day or more per week, at the same times and to and from the same locations.

The review team examined GLSS’s parameter settings related to the scheduling window in the ADEPT system, which were:

- General: initial search request: 0/+20 minutes
- General: pickup request: 0/+20 minutes
- General: appointment request: -20/-10 minutes

These settings are more stringent than the required  $\pm 30$ -minute window. For trips requested by pickup time, the system only searches from the requested time to 20 minutes after the requested time (rather than up to 30 minutes as allowed by the MBTA). For trips requested based on a stated drop-off (appointment) time, the system was set to look for options within only a 10-minute window; i.e., from 20 minutes before the requested drop-off time to 10 minutes before the requested drop-off time.

The review team examined the ride time factor parameter settings that GLSS uses. The settings are shown in Table 9.2. For trips with an estimated direct travel time of 11 minutes or greater, GLSS allowed the maximum on-board times to be 30 minutes longer than the direct time. This is similar to the settings used by VTS. But for trips with a very short direct travel time (less than 11 minutes), GLSS reduced the extra allowed time slightly to 20 minutes (for trips with direct travel times of 6–10 minutes), and to 15 minutes (for trips with direct travel times of 0–5 minutes).

**Table 9.2 – GLSS Ride Time Settings**

<b>Estimated Direct Ride Time</b>	<b>Maximum Allowed On-Board Ride Time</b>
0–5 minutes	Direct + 15 minutes
6–10 minutes	Direct + 20 minutes
>10 minutes	Direct + 30 minutes

GLSS’s settings for maximum on-board ride time are more restrictive than the MBTA’s standards for ride time. The settings appear to be limiting the software when it is searching for rescheduling options on the day of service. GLSS managers noted that the drop-off parameters in particular had been set in this manner to prevent the system from offering pickup times that were too far in advance of the appointment times. GLSS was using an older version of the ADEPT system that was not as flexible in terms of setting travel times by trip length. The older version only had a maximum travel time setting of 60 minutes; to compensate for this setting limitation, GLSS devised the restrictive ride time settings. The MBTA was in the process of purchasing the upgraded version of the software; the upgraded software will permit more varied travel time settings and allow GLSS to use less restrictive settings for ride time.

Table 9.3 summarizes information on peak runs for sedans and vans for April 25–May 1, 2010.

GLSS reported that they have been working on the run structure and introducing more split shifts to provide additional peak hour capacity. At the time of the review team’s site visit, GLSS had 24 split shifts.

**Table 9.3 – GLSS Peak Scheduled Runs by Day, April 25–May 1, 2010**

Day	Peak Sedan Runs	Peak Van Runs	Total Peak Runs
Sunday	22	52	74
Monday	44	113	157
Tuesday	44	119	163
Wednesday	49	117	166
Thursday	47	115	162
Friday	48	106	154
Saturday	30	62	92

### Joint Venture (JV)

JV has a staff of five full-time schedulers plus a lead scheduler. Four schedulers work on Monday and Thursday; all five schedulers work on Tuesday and Wednesday; three work on Sunday; and two work on Friday and Saturday.

Two schedulers work with trips whose origins and/or destinations are on the South Shore (towns due south of Boston). Two schedulers work with trips whose origins and/or destinations are in the towns southwest of Boston. The fifth scheduler focuses on transfer trips. (Prior to July 2009, JV’s current service area was split between JV and another contractor; the other contractor handled the South Shore). One of the two South Shore schedulers handles most of the longer trips in those towns and one of the two southwest schedulers works on the long trips in those towns.

For the 12 months prior to the on-site review, JV hired schedulers to handle the larger service area and ridership (some of them worked for the previous contractor). The lead scheduler had worked with JV slightly more than 12 months.

The schedulers tend to work only on the schedules for the next day. They manually schedule several types of trips:

- Group trips (either explicit or single trips heading to same or adjacent destinations)
- Transfer trips
- Subscription trips, which JV neither anchors to a particular route nor fixes the negotiated time
- Long trips, both within JV’s service area and in and out of Boston
- Riders that need special attention

Similar to the other contractors, JV’s reservationists—rather than the schedulers—set up subscription rides.

The schedulers also pay attention to riders who need to use vans—not only riders who use wheelchairs, but also larger riders who cannot fit comfortably in a sedan. Given the number of trips that JV assigns by hand prior to using ADEPT’s batch function, the lead scheduler estimated that they manually scheduled about 40 percent of all requested trips during the weekdays. For the sample week of April 25–May 1, 2010, the average weekday had 2,080

scheduled trips, which means that schedulers are manually assigning approximately 800 trips on an average weekday.

The manual scheduling continues past 5 p.m. The batch scheduling routine generally takes place from 5:15 to 5:30 p.m. After the batch scheduling routine, JV reviews the output from ADEPT. The output usually has trips with parameter violations—outside of the pickup window, drop-off too late, and/or excessive travel time—which the lead scheduler estimated to be about two percent of all trips, on average. They try to add trips that they had not previously assigned to routes. They add runs, if necessary, using drivers who are seeking overtime work. They can also easily shift the scheduled lunch breaks of the drivers. JV does not use split shifts; most driver shifts are 10–12 hours.

After the review and adjustments, approximately 20 unassigned trips remain (1 percent of the total). This is a reasonable number given the cancellations and no-shows that occur every day. Most of these trips are assigned before the morning of service, either by schedulers or by night dispatchers. According to the Daily Provider Operations reports for the sample week of April 25–May 1, 2010, there were 42 trips for the 7 days that were not assigned to a vehicle run until the day of service, with maximum of 11 (on Sunday).

At the time of the site visit, JV had created 10 affinity zones in ADEPT, but was making use of only seven zones. The lead scheduler said that JV was planning to redraw the zones (after understanding the new trip patterns of the larger service area in the new contract) and make greater use of the affinity zones.

The review team examined the ride time factors parameter settings that JV uses, shown in Table 9.4. For trips with an estimated direct travel time of 11 minutes or greater, GLSS allowed the maximum on-board times to be 30 minutes longer than the direct time. This is similar to the settings used by VTS. But for trips with a very short direct travel time (less than 11 minutes), GLSS reduced the extra allowed time slightly—from 20 minutes for trips with direct travel times of 6–10 minutes, and to 15 minutes for trips with direct travel times of zero to 5 minutes.

**Table 9.4 – JV Ride Time Settings**

<b>Estimated Direct Ride Time</b>	<b>Maximum Allowed On-Board Ride Time</b>
0–5 minutes	Direct + 10 minutes
6–10 minutes	Direct + 12 minutes
11–15 minutes	Direct + 15 minutes
16–20 minutes	Direct + 18 minutes
21–30 minutes	Direct + 20 minutes
31–60 minutes	Direct + 15 minutes
61–120 minutes	Direct + 10 minutes

JV has the most restrictive ride time limits of the three contractors, even though the three service areas are comparable in area. MBTA managers have given the three contractors the flexibility to set their own software parameters even while having a uniform ride time standard for the entire service area.

Table 9.5 summarizes information on peak runs for sedans and for April 25–May 1, 2010.

**Table 9.5 – JV Peak Scheduled Runs by Day, April 25–May 1, 2010**

<b>Day</b>	<b>Peak Sedan Runs</b>	<b>Peak Van Runs</b>	<b>Total Peak Runs</b>
Sunday	20	50	70
Monday	72	90	162
Tuesday	72	90	162
Wednesday	75	90	165
Thursday	75	90	165
Friday	68	90	158
Saturday	30	50	80

## Dispatch Procedures

The review team observed the dispatch areas for all three contractors, focusing on how runs are managed, how no-shows are handled, and how WMR calls are handled. The review team reviewed dispatch staffing and interviewed dispatchers about dispatch procedures. Following are descriptions for each THE RIDE contractor.

### Veterans Transportation Service (VTS)

At the time of the on-site review, VTS employed 20 full-time dispatchers and one part-time dispatcher. This included three full-time lead dispatchers, nine full-time dispatchers, eight full-time assistant dispatchers, and one part-time assistant dispatcher. Lead dispatchers manage the area and are scheduled for morning, mid-day and evening shifts. Dispatchers managed runs and responded to requests for assistance from drivers. Assistant dispatchers took WMR calls from riders and assisted dispatchers as needed.

This level of staffing provides 1–2 lead dispatchers, 3–4 dispatchers, and 3–4 assistant dispatchers during peak operating hours on Tuesdays, Wednesdays, and Thursdays.

On Mondays and Fridays VTS has slightly fewer staff in the dispatch area. On Mondays, the two lead dispatchers, two dispatchers, and four assistant dispatchers are scheduled in the morning. One lead, three dispatchers, and four assistants are scheduled on Monday afternoons. On Fridays, two lead dispatchers, four dispatchers, and two assistant dispatchers are scheduled in the morning. Two dispatchers and four assistants are scheduled on Friday afternoons.

On Saturdays, the staffing plan allows for three dispatchers and 1–2 assistant dispatchers for most of the operating day. On Sundays, one dispatcher and four assistant dispatchers are scheduled in the morning and mid-day. One lead dispatcher, four dispatchers, and one assistant dispatcher are scheduled in the afternoon and evening on Sundays.

This level of staffing, combined with the information about the number of peak runs per day in Table 9.1 above, suggests the following ratios of runs per dispatcher during peak hours (lead dispatchers plus dispatchers):

- Mondays and Fridays                      About 56 runs per dispatcher
- Tuesdays through Thursdays        About 39–47 runs per dispatcher
- Saturdays                                      About 39 runs per dispatcher
- Sunday mornings                          About 105 runs per dispatcher
- Sunday afternoons                        About 21 runs per dispatcher

On weekends, the mix of lead dispatchers, dispatchers, and assistant dispatchers is different than on weekdays and there is more crossover in job functions. On Sunday mornings, for example, assistant dispatchers appear to help with managing the runs, while on Sunday afternoons and evenings, dispatchers appear to assist with calls from riders.

A review of personnel records indicated moderate annual post-training turnover in the dispatch area—19 percent for the 12-month period preceding the review. A further review of the records indicated that most of the turnover was voluntary (employees who moved and left the Boston area). Only one termination in the 12-month period was due to performance.

VTS managers noted that they do not divide the fleet up among the dispatchers. All dispatchers observe the screen that lists the unscheduled trips and watch for late trips and runs that are projected to be late. Each dispatcher can intervene on any run. The interviewed dispatchers noted that they work well as a team and communicate within the dispatch area to minimize duplication of effort. If the area becomes busy, dispatchers might informally assume responsibility for certain zones.

The review team observed that VTS dispatchers are proactive and look ahead 1–2 hours to move trips among vehicle runs so that trips would not be late. Relative to the number of trips being performed, the review team observed very few trips and runs projected by the software to be late. When this happened, dispatchers respond to the situation promptly.

The review team noted a manageable number of unscheduled trips during observations. Unscheduled trips appear to be assigned far enough in advance of the scheduled pickup time to allow for timely performance.

The review team observed dispatchers to be very thorough in handling drivers reporting no-shows. In each instance observed, dispatchers checked the trip times to be sure the driver had arrived within the pickup window and had waited at least 5 minutes after the scheduled pickup time. The dispatchers also used the AVL to check the vehicle location relative to the scheduled location, checked special pickup instructions, and attempted to call riders whenever there was a telephone number in the file.

The review team noted the following issues with the handling of no-shows for trips assigned to the overflow or back-up taxi service. In one case, when a rider called to inquire about an overdue pickup, the VTS dispatcher looked up the trip, found it was assigned to a taxi, and radioed the driver. The driver reported that he “could not find the address, so I no-showed it.” In this case, the driver actually appeared to perform the trip, so it did not show up as a requested no-show in need of dispatch intervention. The dispatcher that handled the issue noted that while all taxis have MDTs and voice communications that are tied into the VTS central dispatch system, the taxi drivers are not always as diligent about contacting VTS for assistance or for no-show approvals. The taxi drivers have a tendency to work with the taxi dispatcher or to make decisions without dispatch approval.

The review team also noted an issue with special pickup instructions. In one instance, a driver reported difficulty locating a rider. When the dispatcher looked up the trip details, she could see that there were special instructions indicating that the rider would be at a particular building within a large medical complex. The dispatcher relayed the information and asked the driver if the information appeared on the in-vehicle MDT screen; the driver indicated that it did not. When this issue was pursued with a lead dispatcher, it was found that in some cases special

instructions appear in the shortcut field, but do not show up in the comment field under the address. While dispatchers can look up records that have both fields, drivers only see instructions in the address-comments field. VTS reported that such information might not be included in the comment field if the reservationist selected a destination from the trip history file but did not retype the special instructions into the comment field.

The review team asked dispatchers how they made decisions on the day of service about whether to accept requests for trip changes or new same-day trips. They consider several factors, including:

- How many total trips are scheduled for the day and the number of total drivers and drivers not assigned to runs (“floater” drivers) available
- The origins and destinations of the trips (some areas are easier to accommodate and shorter trips can be accommodated easier than longer trips)
- The amount of time that, collectively, the vehicles in service have no riders on board (“slack time”) versus the number of unscheduled trips at the time requested (the VTS system is set up to easily provide this information to dispatchers)
- Whether the request requires an accessible vehicle or a child booster seat (both of which are harder to accommodate). Accessible vans comprise less than 60 percent of each contractor’s fleet; at any given time, the vehicles whose runs would best accommodate a new trip request may not be accessible.

VTS has a program to cross-train reservationists, schedulers, dispatchers, and drivers to promote teamwork throughout the operation. Over time, employees in each area are scheduled to observe other parts of the operation. For example, dispatchers will sit with reservationists and schedulers to get a sense of what they do. Dispatchers will also go out on the road with drivers to observe service delivery first hand. Drivers are also brought in to the call center to learn what is involved in reservations, scheduling and dispatch. VTS noted that the program has promoted better understanding among employees in each area as they learn the demands of each job. VTS also said that it also encourages promotion from within the organization. After being exposed to different parts of the operation, reservationists and drivers are more likely to consider scheduling or dispatching jobs. VTS noted that they encourage promotion from within and keep all employees informed of employment opportunities throughout the company. This is a notably good practice.

### **Greater Lynn Senior Services (GLSS)**

At the time of the on-site review, GLSS had a dispatch supervisor and 10 dispatchers. On weekdays, the schedule called for two dispatchers to be available starting at 5 a.m. Four additional dispatchers report from 7–8 a.m. and there are six dispatchers available until 1:30 p.m. Four dispatchers are scheduled for the rest of the afternoon. Two dispatchers are then available in the evening.

On Saturdays, three dispatchers are scheduled to work from the morning until 4:30 p.m. One additional dispatcher reports at 1 p.m., which provides four dispatchers through the mid-afternoon. Two dispatchers are available from 4:30–5:30 p.m., and then one dispatcher is on duty through the rest of the evening.

On Sundays, two dispatchers are scheduled for most of the day, with three available between the hours of 1–4:30 p.m.

Given the number of peak runs scheduled by day (see Table 9.3), this level of staffing provided the following ratios of peak runs per dispatcher:

- Weekdays: 26–42 peak runs per dispatcher
- Saturdays: 23–31 peak runs per dispatcher
- Sundays: 25–37 peak runs per dispatcher

A review of personnel records indicated that staffing in the dispatch area was stable. There were no post-training terminations in the 12-month period preceding the on-site review. One dispatch trainee had been terminated after five days of training.

Dispatch responsibilities are split among the staff on duty by area. Typically, when there are four or five dispatchers on duty, one or two oversee runs that are in Boston or scheduled to go to Boston. Two dispatchers oversee runs operating in communities on the North Shore. One or two then handle telephone calls to allow the others to focus on run management: this includes no-show calls as well as WMR calls that are transferred over from the reservations area, from riders who attempt to use the ADEPT system to answer questions about trip status, but may need to transfer some calls to dispatch.

GLSS uses two radio channels for paratransit operations; one is assigned to the dispatchers who oversee the Boston runs, and the other to the dispatchers who oversee the North Shore runs. All dispatchers can transmit messages on either channel or can send messages out on both channels to the entire fleet.

The review team observed that the dispatchers are proactive in their management of runs; they look ahead 1-2 hours to identify pickups and drop-offs that might be late. They then work to reassign these trips to other runs or to move other trips to get the runs back on time.

The review team observed that dispatchers relied almost exclusively on radio messages sent to all drivers (“all-calls”) to identify options for placing unassigned trips or rescheduled trips. While they would first use the ADEPT system to search for possible scheduling options, the system rarely finds solutions. This is likely due to the tight schedule settings in the system (see above). If the ADEPT system does not find a scheduling solution, dispatchers put out an “all-call” to drivers and ask if anyone can assist with the trip. Dispatchers noted that drivers were good about responding when they are available to help out.

Dispatchers also did a good job of handling any unscheduled trips, same-day trip requests, or changes. During the observations, by 9:30 a.m., all unscheduled trips had been placed on runs. The Daily Provider Operations reports obtained for the week of April 25–May 1, 2010, also showed that very few unscheduled trips remained in the system after 10 a.m.

The review team observed the procedures used to handle no-shows and discussed this with dispatchers. The following procedure was noted and observed:

- Drivers are to wait 5 minutes, during which they will go to the door or try to locate the rider in other ways.
- After 5 minutes, drivers send a request for a no-show approval via the MDT.
- Dispatchers double-check the scheduled time and the arrival time to be sure the vehicle arrived and waited at least 5 minutes in the pickup window.
- Dispatchers double-check the vehicle location using the AVL system.

- Dispatchers attempt to call the rider. If they reach the rider, they also mention the pickup time and location just to make sure that it is correct.
- If they reach the rider and he or she is not going, the dispatcher will ask if any subsequent trips for that day are needed or should be cancelled. The dispatcher will then authorize the no-show and tell the driver to proceed.
- If the rider cannot be reached by phone, the dispatcher will check the schedule to see if the driver can wait a few more minutes without inconveniencing other passengers. If so, drivers are typically asked to wait another 5 minutes before proceeding. If not, the dispatcher will authorize the no-show and instruct the driver to proceed.

On the day of observations, three runs had been left unscheduled. GLSS used these runs to cover the runs of drivers with unscheduled absences. When asked about run coverage, the dispatchers noted that schedulers have been trying recently to leave 2–3 runs with no trips. Beyond the few runs that schedulers might leave available, there are no scheduled spare (“extraboard”) runs and drivers. Any runs that schedulers are able to leave available are in the mornings. In the afternoons there are no available empty runs or extraboard runs. In order to provide coverage for the afternoon, GLSS asks drivers to work overtime.

GLSS dispatchers noted inconsistencies and mistakes that can occur in providing special pickup instructions to drivers on their manifests. If the reservationists create a new trip request in the ADEPT software by copying a prior trip request (same rider, same origin and destination), any special pickup instructions (e.g., “use side entrance”) from the prior trip request will also be included in the new trip request. The dispatchers said that instructions are sometimes incorrect for the new trip request, but the reservationists often neglect to confirm them with the rider for the new trip being booked.

The review team noted a several instances where drivers’ requesting assistance with locating pickup addresses and the dispatchers attempting to assist both encountered difficulties locating the address. Dispatchers reported that the map in the ADEPT system needs to be updated. GLSS managers said that the version of ADEPT is somewhat dated and that the MBTA was in the process of purchasing an updated version that will have a more accurate map.

### **Joint Venture (JV)**

On weekdays, JV has five dispatchers working during the morning, midday, and afternoon peaks (including a lead dispatcher or supervisor). In the evening, there are three dispatchers. On Saturday and Sunday, there are 3–4 dispatchers. During the peak, this yields a ratio of up to 33 runs per dispatcher. At other times, the ratio is no greater than 25 runs per dispatcher. This is a reasonable workload, given JV’s extensive use of MDTs for routine communication between drivers and dispatchers.

JV has trained and encouraged its drivers and dispatchers to operate via “quiet dispatch.” This means using their “Ranger” MDT rather than radio whenever feasible. Even beyond the routine pickup and drop-off data, dispatchers transmit most trip cancellations and trip add-ons to the drivers via text messages that appear on the MDTs’ display screens. Trip data is easily transferred from the ADEPT software to the MDT system.

JV’s lead dispatcher has primary responsibility for monitoring real-time operations and the associated on-time performance. He stated that he tries to look 2 hours ahead and expects the other dispatchers to be looking ahead at least 1 hour. He said that his key tool is the “ticker”: a

large video screen mounted in the dispatch room that shows the performance of runs and color codes the runs by on-time performance, e.g., white for 1–9 minutes past the negotiated pickup time, up to red for 30 or more minutes past the negotiated pickup time. He said that he wants to keep all pickups at or before the negotiated pickup time (0 minutes), even if the pickup window extends to +15 minutes. But JV's primary objective is to avoid any pickups more than 30 minutes after pickup time, since this is the MBTA's threshold for liquidated damages.

When JV reservationists receive WMR calls from riders, they transfer these calls to JV's lead dispatcher. He may try to handle the calls himself. In other cases, he may transfer the call to the dispatcher who is directly monitoring a particular run.

When JV dispatch receives calls (via the reservationists) for a will-call pickup, JV generally does not provide a pickup time to riders in real-time. The lead dispatcher tells the riders to call back in 30–45 minutes. In the meantime, the dispatchers work to find a slot for these trips. JV's goal is to try to pick them up within 60 minutes of the initial call. The lead dispatcher also takes responsibility for trying to accommodate requests for same-day trips. He estimated that there are 30 same-day requests on a typical weekday. On average, JV may be able to provide trips for half of these same-day requests.

The other dispatchers generally monitored a subset of the total runs currently on the road. Based on review team observations, each dispatcher has a different style and preference for using the ADEPT system. As stated, most communication with drivers takes place via the MDTs rather than over the radio. Dispatchers are observing their assigned routes for late and potentially late runs. Some dispatchers make greater use of the ADEPT dispatch screens (versus the video ticker) to monitor timeliness. They all have the capability of removing and transferring trips among runs, including the runs for which they do not have primary responsibility. Dispatchers move many of these trips via messages on the MDTs and in turn, drivers acknowledge the new trips via MDT.

The dispatchers and drivers appeared to follow the proper procedures to confirm passenger no-shows. JV dispatchers also used AVLs to vehicle to verify that the driver was at the correct pickup location.

## 9.4 Driver Interviews

The review team interviewed a cross section of eight drivers at each of the three vendors as they finished their runs. The review team conducted the interviews in private and drivers were informed that they would remain anonymous. The interviews included both new and experienced drivers; the shortest tenure was less than one month and the longest tenure was 15 years. Questions covered schedules, dispatch support, training, and understanding of service policies. Attachment H 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 (i.e., too much time without a rider on the vehicle), about right, or too tight, 13 of the 24 drivers said that the schedules were about right, though most offered that schedules change every day and usually get tighter – or more delayed – as the day continues. Two drivers noted that one trip per hour is a reasonable expectation. Two drivers commented that precipitation—particularly snow—delays schedules. No driver characterized the schedule as too loose.

The pickup window for THE RIDE service is 5 minutes before to 15 minutes after the scheduled pickup time. During the interviews, none of the 24 drivers stated the correct pickup window. When asked to define the pickup window, drivers offered a variety of permissible pickup times beginning as early as 10 minutes before the scheduled time to 15 minutes after it. *THE RIDE Guide* explains,

Be ready to travel 5 minutes before your scheduled pickup and be prepared to wait up to 15 minutes after that time. The driver must wait for you for 5 minutes from the time of the scheduled pickup. If you are not at the pickup location, the driver will obtain clearance from his or her dispatcher to leave after waiting 5 minutes. Please do not leave your pickup location to call before the end of the 15-minute waiting period.

Nineteen of the 24 drivers felt that riders understand the 20-minute pickup window. However, with so few drivers agreeing on the driver's pickup window, it is not clear that the drivers can reliably comment on the rider's pickup window. Three drivers noted that riders often require more time or request that drivers arrive as early as 15 minutes before the scheduled pickup time.

When asked how often they ran late (meaning outside the on-time window), seven of the 24 drivers responded, "once or twice a week." Other comments ranged from low percentages to a few times each month. All drivers who ran late cited afternoon traffic – particularly in or around Boston. Four drivers commented that riders often understand late arrivals due to traffic and sympathize with drivers. Six drivers stated that they have never run late.

When asked about the assistance they receive from dispatchers when running behind schedule, drivers consistently provided the same response: they send a message to their dispatchers on the Ranger MDTs to request assistance; at that point, dispatch often asks other drivers near a prospective pickup to assume that trip. Drivers who lose that trip may sometimes receive another trip as a result. All drivers noted that switching trips is common in the afternoons as traffic congests and schedules delay, and most of them said they often volunteer to help other drivers.

When asked if they needed to arrive early to stay on schedule, eight of the 24 drivers replied yes but quickly added that they often park away from the rider's residence until 5 minutes before the scheduled pickup so that riders do not feel hurried.

When asked if riders often have a different idea of the scheduled pickup time than is on the manifest, six of the 24 drivers said that riders might have a scheduled time that differs, but usually it is less than 30 minutes different from the driver's pickup time. Two drivers said that riders might be off by an hour. Three drivers said that it might happen once a week. One driver noted that a rider having a different pickup time than on the manifest is more common with transfer trips while another driver commented that riders sometimes call to change a trip and refer to the older arrival time.

All 24 drivers demonstrated a consistent understanding of the procedures to follow when riders were no-shows. All said they would wait a minimum of 5 minutes, would then contact dispatch, and would follow dispatch instructions from there. Most indicated that dispatchers attempt to call riders before determining a no-show and releasing the driver.

Drivers were also asked if information on the manifests about special pickup instructions or rider needs was accurate. Only two of the 24 drivers said that the instructions were often inaccurate. Two drivers noted that, while accurate, the Ranger MDT requires drivers to scroll down to the

special instructions. One driver noted that instructions sometimes change (e.g., if a rider has a walker instead of a wheelchair), in which case the driver asks the rider to inform OTA about the change.

In response to a question about the most difficult part of the job, six drivers indicated that traffic congestion and its effect on schedules were the greatest challenge. Eight drivers mentioned that riders could present some challenges, either due to their physical or cognitive abilities or other physical factors. Five drivers said that the job does not present excessive challenges.

Finally, at the end of the interviews, the review team asked drivers if they wanted to provide any other input. Comments included:

- It would help if destinations were not closed when riders arrived there. In addition, it would help to be informed about parades or other unusual traffic situations.
- Contractors should more firmly discipline drivers who receive many complaints.
- Training classes should include tours of the dispatch room.
- THE RIDE drivers should receive a higher wage than fixed route drivers because the former provide personal and comprehensive service.
- Riders with mobility aides have difficulty navigating snowy sidewalks.
- Riders really appreciate the service.
- Management recognizes drivers' effort. THE RIDE is a good service, because riders really need the help.

## 9.5 On-Time Performance

As stated earlier in this chapter of the report, MBTA has established an on-time pickup window for THE RIDE of -5 to +15 minutes relative to the negotiated pickup times (-5/+15). For trips with requested drop-off times, the on-time threshold is +10 minutes; there is no limit to early drop-offs. MBTA's standard for all contractors is that on a monthly basis 90 percent of all trips be on time on both ends, i.e., neither a late pickup nor a late drop-off.

### Reported On-Time Performance

For 11 months of FY 2010 (July 2009 to May 2010), MBTA reported the following on-time performance:

- JV = 95.6 percent
- GLSS = 94.2 percent
- VTS = 93.8 percent

The overall on-time performance was 94.5 percent.

### Calculated On-Time Performance for Sample Day

The review team performed an independent calculation of on-time performance of the three contractors. Using the ADEPT database, the review team separately analyzed performance for pickups and drop-offs. ADEPT receives its data from each contractor based on the pickups and drop-offs performed. Drivers enter data into their MDTs as they arrive and depart from each pickup and drop-off location. The review team could not collect this data from paper manifests as two of the three contractors use MDTs exclusively.

The review team analyzed the reconciled trip data for Wednesday, April 28, 2010, which included 5,966 completed trips. Table 9.6 presents the pickup performance for each contractor and systemwide.

**Table 9.6 – On-Time Pickup Performance: April 28, 2010**

Performance Measure	All Trips	GLSS	JV	VTs
	5,966	1,882	1,032	1,480
Early (before -15)	33.6%	39.5%	40.4%	66.3%
In window (-5/+15)	59.8%	55.7%	55.8%	23.1%
All trips early or in window	93.3%	95.2%	96.3%	89.4%
All late (after +15)	6.7%	4.8%	3.7%	10.6%
Very late (after +30)	1.0%	0.8%	0.3%	1.8%

On this sample day, 59.8 percent of all pickups were in THE RIDE's pickup window. If one also includes pickups made prior to the beginning of the window, 93.3 percent of trips were on time. By contractor, the on-time performance varied from 89.4 percent (VTs) to 96.3 percent (JV).

Of the completed trips, 2,943 had a requested drop-off time. Table 9.7 presents the drop-off performance for each contractor and systemwide.

**Table 9.7 – On-Time Drop-Off Performance: April 28, 2010**

Performance Measure	All Trips	GLSS	JV	VTs
	2,943	910	897	1,136
Very early (before -30)	35.8%	47.4%	30.1%	31.1%
On time (-30/0)	57.9%	49.2%	61.3%	62.2%
Up to +10 minutes (0/+10)	4.0%	2.4%	5.5%	4.1%
All trips in RIDE window	97.8%	99.1%	96.9%	97.5%
Late (after +10)	<b>2.2%</b>	<b>0.9%</b>	<b>3.1%</b>	<b>2.5%</b>

Based on the MBTA's standard for on-time drop-offs, the performance of all three contractors in this sample is good, with GLSS delivering 99.1 percent of drop-offs on time. The lowest performance was JV's with 96.9 percent of drop-offs on time.

For this sample, the portion of trips with arrivals after the requested appointment time that meet the MBTA's on-time standard is 4 percent. Individual contractors range from 2.4 percent (GLSS) to 5.5 percent (JV). In addition, 35.8 percent of the drop-offs took place more than 30 minutes ahead of the requested pickup time ranging from 30.1 percent (JV) to 47.4 percent (GLSS). The MBTA should realize that very early drop-offs might pose a problem for some riders. They may be heading to a facility that is not yet open or does not have a safe and comfortable waiting area for persons with disabilities.

## 9.6 No-Show and Missed-Trip Coding

The review team examined several Vehicle Location Audit reports for the sample day of April 28, 2010, to determine if the contractors were properly categorizing trips as no-shows. Based on THE RIDE policy, drivers are supposed to arrive in the pickup window or before and wait at least 5 minutes within the pickup window before leaving. The audit reports list a sample of declared no-shows, along with the negotiated pickup time, vehicle arrival time at the pickup

location, and the vehicle departure time. Table 9.8 presents the results of the review team’s analysis.

**Table 9.8 – Review of No-Show Coding: April 28, 2010**

	<b>All Contractors</b>	<b>GLSS</b>	<b>JV</b>	<b>VTs</b>
Total no-show sample	289	54	118	117
Proper arrival, wait times	133	35	13	85
Wait time < 5 minutes	11	7	1	3
Wait time not in window	32	8	2	22
Times not provided	113	4	102	7

This sample shows that overall, 133 of the coded no-shows had proper arrival and wait times (46 percent). Drivers did not wait for at least 5 minutes for 4 percent of the no-shows. For another 11 percent, the drivers wait period was either before or after the pickup window. In these cases, one cannot know if driver was or was not acting properly; the dispatcher may have given him or her instructions to leave, based on other information, e.g., a phone call confirming that the rider did not want to take the trip. A more careful review of this report by the MBTA and its contractors would help to verify that dispatchers and drivers are following the proper no-show procedures.

In addition, the sample included 118 coded no-shows by JV. Only 16 of these 118 trips had recorded times for the driver’s arrival and driver’s departure at the pickup address. It is not clear why such a large portion of JV data was not available.

## 9.7 Analysis of On-Board Travel Times

Lengthy on-board travel times are part of the ADA compliance review both because they are inconvenient and potentially stressful for the rider, and because a pattern of excessively long trips may indicate a capacity constraint. Section 37.131(f)(3)(i)(C) of the DOT ADA regulations states that the transit entity shall not limit the availability of service by an operational pattern or practice that includes a “substantial number of trips with excessive trip lengths.”

The MBTA’s contracts with the three contractors include the following provision:

No passenger is to be kept on board a vehicle for more than sixty (60) minutes, except for transfers (limit 60 minutes per area) unless the factors influencing ride time are beyond the control of the Contractor, or if the ride time on the most direct route would be in excess of thirty (30) minutes, the actual ride time shall not exceed twice the time required on the most direct route. This standard may be relaxed at the direction of the MBTA.

**NOTE: In compliance with ADA guidelines, the Contractor shall perform quality control analysis to measure schedule results to shortest MBTA fixed route travel itineraries (excluding commuter rail) plus 20 minutes as a standard for travel time limits [emphasis added].** The MBTA reserves the right to make changes to this standard.

There are two separate standards in this provision, both of them directed toward on-board times that exceed 60 minutes. One standard requires that paratransit trips should not exceed twice the direct driving time (e.g., the time a van with a single passenger on board would require) and the second standard requires that trips over 60-minutes long should not exceed the MBTA fixed route service time by more than 20 minutes. If a trip requires a transfer to another paratransit contractor’s vehicle, these standards apply to each contractor’s part of the trip. The MBTA

contracts provide for a penalty if more than 2 percent of trips exceed 60 minutes on a monthly basis.

The review team used data provided by the for the week of April 25–May 1, 2010, to examine the time customers remain on board paratransit vehicles, and the proportion of trips that are longer than one hour.

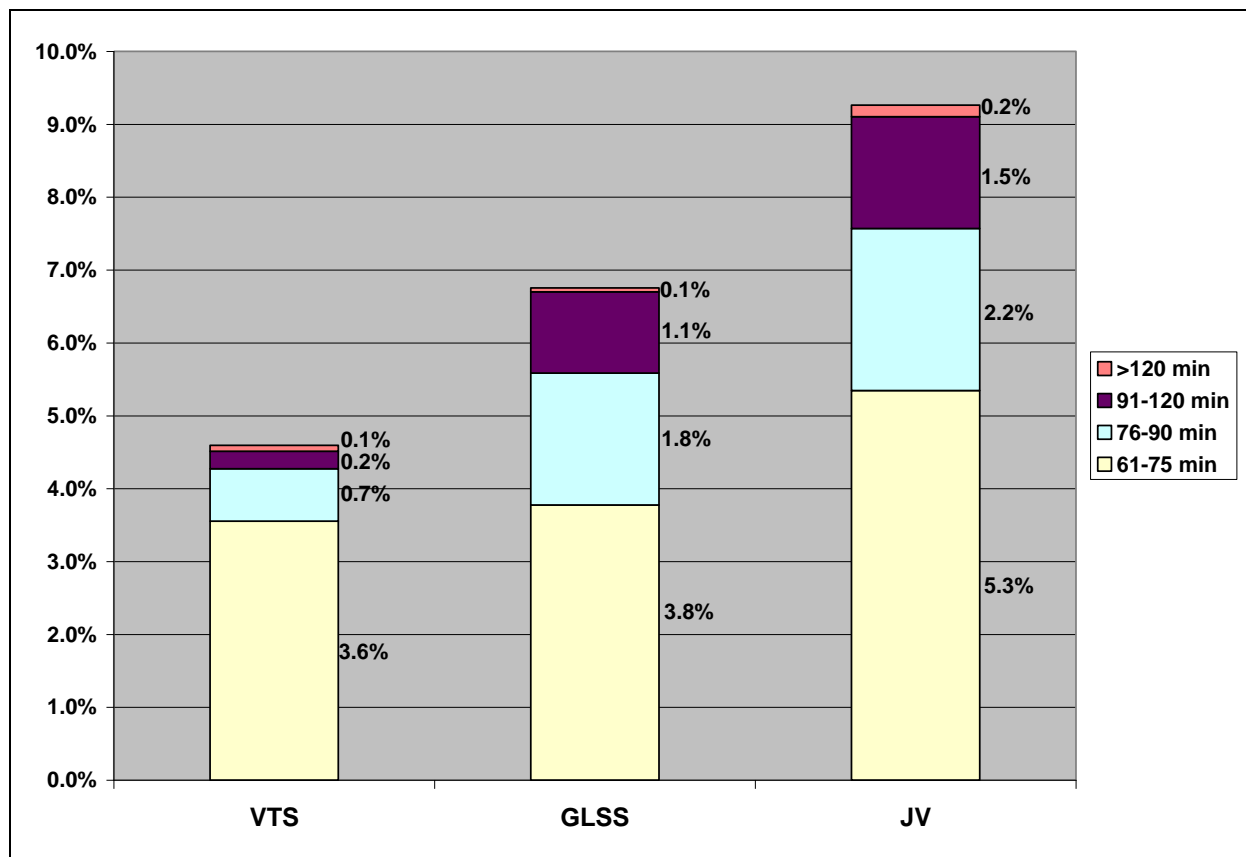
GLSS and JV provided data on paratransit trip time compared to direct-drive time calculated by ADEPT, which showed that 1.4 percent (GLSS) and 2.4 percent (JV) of trips longer than 30 minutes exceeded twice the calculated direct driving time. These figures are not excessive. They are also not directly comparable, since, as discussed above under dispatching, the direct-drive time calculations depend on the parameter settings in each contractor's ADEPT software. VTS data did not provide this data.

The review team examined trip times by using contractor data for Wednesday April 28, 2010, and by comparing paratransit trip times with MBTA fixed route trip times.

For all trips that occurred on the selected day, 6.6 percent of trips exceeded 60 minutes. (For the week of April 25–May 1, the proportion over 60 minutes was 5.6 percent. The proportion was 4.6 percent for VTS, 6.8 percent for GLSS, and 9.3 percent for JV.) The differences in these proportions are likely due to the sizes of the contractor service areas as well as the relative accessibility to the City of Boston, where all three contractors have a large share of trip origins and destinations. These proportions are not in themselves excessive, given the large size of the service areas as well as traffic conditions in Boston. Table 9.9 and Figure 9.1 show the comparative distributions of trips longer than 60 minutes.

Table 9.9 - Distribution of Trips Over 60 Minutes, Wednesday April 28, 2010

<b>VTs</b>			
<b>Trip Time (min)</b>	<b>Number</b>	<b>Percent</b>	<b>Cum Pct</b>
All trips	2,504	100.0%	
0–30	1,596	63.7%	100.0%
31–60	793	31.7%	36.3%
61–75	89	3.6%	4.6%
76–90	18	0.7%	1.0%
91–120	6	0.2%	0.3%
121+	2	0.1%	0.1%
<b>GLSS</b>			
<b>Trip Time (min)</b>	<b>Number</b>	<b>Percent</b>	<b>Cum Pct</b>
All trips	1,880	100.0%	
0–30	1,243	66.1%	100.0%
31–60	510	27.1%	33.9%
61–75	71	3.8%	6.8%
76–90	34	1.8%	3.0%
91–120	21	1.1%	1.2%
121+	1	0.1%	0.1%
<b>JV</b>			
<b>Trip Time (min)</b>	<b>Number</b>	<b>Percent</b>	<b>Cum Pct</b>
All trips	1,889	100.0%	
0–30	1,151	60.9%	100.0%
31–60	563	29.8%	39.1%
61–75	101	5.3%	9.3%
76–90	42	2.2%	3.9%
91–120	29	1.5%	1.7%
121+	3	0.2%	0.2%
<b>All Contractors</b>			
<b>Trip Time (min)</b>	<b>Number</b>	<b>Percent</b>	<b>Cum Pct</b>
All trips	6,273	100.0%	
0–30	3,990	63.6%	100.0%
31–60	1,866	29.7%	36.4%
61–75	261	4.2%	6.6%
76–90	94	1.5%	2.5%
91–120	56	0.9%	1.0%
121+	6	0.1%	0.1%

**Figure 9.1 – Distribution of Trips Over 60 Minutes, Wednesday April 28, 2010**

Data for the GLSS and JV trips also compared the direct-drive distances and times with the actual distances and times. For trips longer than 30 minutes, GLSS exceeded twice the calculated direct time in 1.4% of their trips for the sample week; JV exceeded twice the direct time in 2.4% of their trips. The data from VTS did not include direct trip times for comparison with actual times. These comparisons with direct trip times are not consistent among contractors because the contractors can set the travel speed parameters in the ADEPT software differently. Although the proportion of trips that exceeded the calculated direct-drive time do not conform to MBTA policy, they are not large enough to suggest a capacity constraint that is non-compliant with the DOT ADA regulations.

The review team selected a sample of 27 trips of at least 75 minutes in length and compared these paratransit trip times to fixed route trips using MBTA buses and rapid transit. The selected paratransit trips took place on Wednesday, April 28, 2010. Five of the trips were transfers between contractors.

The review team used the MBTA's Trip Planner to compare the fixed route and paratransit trips. These trips started at the same time of day as the paratransit trips so that headways would be representative, and the fixed route estimates included waiting time, transfer time if more than one fixed route service was used in the itinerary, and walking time to and from the closest bus stop or transit station. For paratransit trips that involved two contractors, the fixed route comparison was an itinerary from the overall origin to destination, not two itineraries to and from the paratransit transfer point. (For example, a paratransit trip from Salem to Belmont involved a

transfer from GLSS to VTS at Oak Grove Station in Malden, but the fixed route comparison was from Salem to Belmont by the shortest fixed route itinerary). FTA's standard methodology for fixed route comparison utilizes both bus and rapid transit but not commuter rail.

Of the 27 trips, the paratransit time was shorter than the fixed route time for 11 of the trips (41 percent), ranging from 1–85 minutes longer. Paratransit time was longer than fixed route for 16 trips; of these, the paratransit time was more than 20 minutes longer than fixed route for ten trips (37 percent of the total). The ten paratransit trips that took more than 20 minutes longer than fixed route ranged from 21–114 minutes longer and averaged 49 minutes (94 percent) longer than fixed route. It is this group of ten trips that exceeds the MBTA's standard of fixed route time plus 20 minutes.

The ten paratransit trips that exceeded fixed route time by more than 20 minutes constituted 37 percent of the sample that was taken from the universe of trips of longer than 75 minutes. The trips longer than 75 minutes comprised 2.5 percent of all trips on the sample day, so if the comparison with fixed route times is representative of these trips, slightly less than 1 percent of the paratransit trips longer than 75 minutes exceeded the standard ( $37\% \times 2.5\% = 0.9\%$ ).

It should be noted that for nine of the ten paratransit trips that were more than 20 minutes longer than a comparable fixed route trip, the fixed route itineraries involved a single bus line, rapid transit, or one bus plus rapid transit. Given that traffic conditions are an important factor in paratransit trip length, the alternative of rapid transit is a more stringent yardstick for comparison than fixed route buses running in traffic.

The conclusion is that the proportion of trips longer than one hour does not indicate a pattern or practice that limits the availability of service and is thus compliant with the regulation. The full analysis is presented in Table 9.10.

Table 9-10 – Comparison of Travel Times on THE RIDE ADA Paratransit Service vs. Fixed Route for Selected Trips, April 25–May 1, 2010

Paratransit Trip						Fixed Route Trip Comparison						
Trip No.	Contractor	Pickup Address Drop-Off Address	Pickup Time	Drop-Off Time	Trip Time (min)	FR Time	Itinerary (Bus Route/Subway Line)	Walk Time	Wait Time	FR Ride Time	FR Transfer Time	Paratransit – Fixed Route Time
1	VTs	1 Guest St, Brighton 3900 Mystic Valley Pkwy, Medford	4:22 p.m.	6:36 p.m.	134	101	86, Orange, 100	20	11	45	25	33
2	VTs	800 W Cummings Park, Woburn 100 Mill St, Belmont	5:14 p.m.	6:54 p.m.	100	132	335, 352, Orange, Red, 73	23	5	76	28	-32
3	VTs	150 Edgemere Rd, West Roxbury 350 Washington St, Boston	7:58	10:04	126	69	34, Orange	17	7	36	9	57
4	VTs	1 Arcadia St, Dorchester 50 Martin St, Medford	4:12 p.m.	5:48 p.m.	96	86	18, Red, 96	8	6	57	15	10
5	VTs	1000 Harrison Ave, Roxbury 50 Orchard Ave, Newton	2:52 p.m.	4:11 p.m.	79	91	47, 11, 553	12	5	52	22	-12
6	VTs	150 Nashua St. Boston 150 Garfield Ave, Hyde Park	3:39 p.m.	5:24 p.m.	105	105	Orange, 29, 24	18	3	71	13	0
7	VTs	1 Warren Ave, Somerville 650 Cambridge St, Brighton	6:30	8:27	117	27	86,	16	5	18	0	90
8	VTs	300 Mishawum Rd, Woburn 100 High St, Medford	2:22 p.m.	4:04 p.m.	102	44	355	18	1	34	0	58
9	GLSS	250 Tremont St, Boston 400 Revere Beach Blvd, Revere	12:50 p.m.	2:05 p.m.	75	71	Orange, 441	18	5	19	29	4
10	GLSS	400 Revere Beach Blvd, Revere 1 Parkman St, Boston	7:41	9:14	93	103	441, Orange, Red, 18	13	5	54	31	-10
11	GLSS	200 S Huntington Ave, Jamaica Plain 150 School St, Everett	5:19 p.m.	6:38 p.m.	79	71	Green, Orange, 104	16	5	36	14	8
12	GLSS	600 Washington St, Boston 50 Gardner St, Peabody	4:30 p.m.	6:00 p.m.	90	175	449, 435	22	5	75	73	-85
13	GLSS	150 Brookline Ave, Boston 50 Temple St, Reading	4:17 p.m.	5:43 p.m.	86	125	8, Orange, 136	17	3	83	22	-39
14	GLSS	150 Milk St, Boston 250 River St, Mattapan	12:01 p.m.	1:47 p.m.	106	131	Red, 27, 33	13	5	54	59	-25
15	GLSS	1 Park Plz, Boston 50 Lee Fort Ter, Salem	4:52 p.m.	6:39 p.m.	107	112	Green, 450, 451	24	5	74	28	-5

Paratransit Trip						Fixed Route Trip Comparison						
Trip No.	Contractor	Pickup Address Drop-Off Address	Pickup Time	Drop-Off Time	Trip Time (min)	FR Time	Itinerary (Bus Route/Subway Line)	Walk Time	Wait Time	FR Ride Time	FR Transfer Time	Paratransit – Fixed Route Time
16	JV	1 Staniford St, Boston	5:01 p.m.	6:27 p.m.	86	67	Orange, 31	16	3	39	9	19
		300 Brush Hill Rd, Milton										
17	JV	100 Cambridge St, Boston	2:08 p.m.	3:37 p.m.	89	90	Orange, 36	35	0	46	9	-1
		250 Bridge St, Dedham										
18	JV	50 Staniford St, Boston	2:22 p.m.	3:41 p.m.	79	63	Red, 215	27	1	24	11	16
		1 Grayson St, Dorchester										
19	JV	1 Science Park, Boston	2:08 p.m.	3:31 p.m.	83	63	Orange, Red	29	1	23	10	20
		50 Msgr Patrick J Lydon Way, Dorchester										
20	JV	1 Parkman St, Boston	12:01 p.m.	1:35 p.m.	94	73	Green, Red	26	7	29	11	21
		650 N Main St, Randolph										
21	JV	300 Brush Hill Rd, Milton	6:35	8:35	120	71	31, Orange	19	5	39	8	49
		1 Staniford St, Boston										
22	JV	1 Parkman St, Boston	12:01 p.m.	2:00 p.m.	119	93	18, 240	18	5	46	24	26
		1 Desmond Ave, Randolph										
T1	GLSS/VT	200 Locust St, Lynn	7:34	09:14	100	78	450, Orange, Red	15	4	47	12	22
		1 Cambridge Ctr, Cambridge										
T3	GLSS/VT	1 Colonial Ter, Salem	8:39	10:39	120	138	450, Orange, 8, 60	19	5	91	23	-18
		100 Fairway Rd, Chestnut Hill										
T5	JV/GLSS	50 Newport Ave Ext, Quincy	3:10 p.m.	6:08 p.m.	178	64	210, Red, Orange	13	5	32	14	114
		1 Leblanc Dr, Peabody										
T7	GLSS/VT	50 Saint Peter St, Salem	6:37	9:03	146	149	450, Green, Red, 74	11	22	92	24	-3
		1 Watson Rd, Belmont										
T9	JV/VT	1 O’Neil Dr, Dedham	7:30	9:16	106	83	34, Orange, 95	14	7	48	14	23
		1 Middlesex Ave, Somerville										

Notes: T indicates transfer trip  
Street numbers rounded to the nearest 50

## 9.8 Findings

1. Page 7 of *THE RIDE Guide* states, “If you are a wheelchair or scooter user, the driver will apply the MBTA supplied body belt immediately upon greeting you.” The MBTA must cease requiring paratransit passengers to use “body belts” as a condition of service. The DOT ADA regulations at 49 C.F.R. § 37.165(c)(3) authorize MBTA to require passengers to permit their wheelchair to be secured but do not permit requirements for additional securement of their person. The requirement for wheelchair securement devices for buses and vans, found in 49 C.F.R. § 38.23(d), contains various performance standards for attachment points and forces that must be withstood and also requires seat belts and shoulder harnesses for each securement location. However, there is no provision for separate trunk supports or “body belts,” which would not be expected to be a component of the vehicle’s securement system but of a passenger’s wheelchair seating system if needed for positioning purposes. MBTA’s policy requiring paratransit drivers to secure wheelchair users with a “body belt” that wraps around the rider’s torso and the backrest of his or her wheelchair is both dangerous and contrary to regulatory requirements established under DOT ADA implementation regulations.

## 9.9 Recommendations

1. The MBTA and VTS should reinforce with VTS taxi subcontractors the importance of getting dispatch authorization before recording a rider as a no-show. Given that all taxis used by VTS have MDTs and radios that are connected to the central THE RIDE dispatch office, this should not require extraordinary effort.
2. The MBTA should upgrade the ADEPT software at GLSS and all contractors, including the underlying map, to allow better travel time parameters to be set and to enable better identification of addresses.
3. It is recommended that GLSS should schedule an adequate number of extraboard runs each morning and each afternoon to cover unscheduled driver absences. It is also recommended that GLSS include some morning and afternoon floater runs that can be used to handle same-day service issues.
4. The MBTA should have the contractors provide refresher training to all drivers concerning the pickup window.
5. The MBTA should consider developing a drop-off window with an early threshold, rather than consider any time prior to the appointment time as acceptable. The MBTA should realize that very early drop-offs might pose a problem for some riders. They may be heading to a facility that is not yet open or does not have a safe and comfortable waiting area for persons with disabilities.
6. The MBTA should continue to monitor recorded no-shows to ensure that contractors are following the proper procedures—and that riders are improperly charged with no-shows.
7. The MBTA should ensure that all contractors are providing full data on trips that they record as no-shows.
8. The MBTA should require all contractors to submit the monthly data needed to apply its contractual standards for actual trip time versus direct drive time.

## 10 Resources

As with Telephone Access and Service Performance, Section 27.133 (f) of the DOT ADA regulations (Capacity Constraints) recognizes that service quality can constitute a capacity constraint that limits the availability of service to ADA complementary paratransit-eligible riders. Consequently, the review team examined the resources made available by the MBTA to provide ADA complementary paratransit service. This information included:

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

### 10.1 Consumer Comments

The eleven riders interviewed in advance of the on-site review mostly had positive views of driver performance and attitude. Many riders complimented drivers for their willingness to assist them with bags or other accessories. One rider commented that drivers have improved since the July 2009 contract began.

### 10.2 Vehicle Fleet and Availability

Table 10.1 summarizes the vehicle fleet for the three contractors, which includes both sedans and vans.

**Table 10.1 – Vehicle Fleet Used for THE RIDE**

<b>Contractor</b>	<b>MBTA Vans</b>	<b>MBTA Sedans</b>	<b>Contractor Vehicles</b>	<b>TOTAL</b>
<b>GLSS</b>	123	66	20	201
<b>JV</b>	123	70	22	215
<b>VTS</b>	143	82	25	250
<b>Total</b>	<b>389</b>	<b>218</b>	<b>67</b>	<b>666</b>

As discussed later in this chapter, the MBTA plans to purchase 108 new vehicles, most to replace the contractor vehicles. The MBTA adheres to the recommended life of vehicles: maximum of 7 years for vans and 6 years for sedans. The average fleet age was under 5 years.

### 10.3 Driver Availability, Training, and Turnover

### 10.4 Staffing

At the time of the site visit, VTS had 310 drivers, all full-time; GLSS had 304 drivers, 253 full-time and 51 part-time; and JV had 246 drivers, 240 full-time and six part-time. Managers of all three contractors acknowledged that they were always searching for more drivers. For example, a VTS manager said that the ideal staffing would be 335 full-time drivers. They noted that with the economic conditions, they were able to be more selective in their hiring. The way in which

the contractors ensured a sufficient driver pool was to offer overtime and expand the definition of “full-time,” often to 48 or more hours per week.

There did not appear to be capacity constraints arising from a shortage of office staff: reservationists, schedulers, or dispatchers. The ratio of peak runs to dispatchers is higher than typical, but the extensive use of MDTs and move to “quiet dispatch” makes this reasonable.

## Turnover

GLSS personnel records showed that there were 74 driver terminations in during FY 2010. Of these, 39 occurred during training, and 35 occurred post-training. Given a total driver workforce of 304, this yields an annual post-training turnover rate of 12 percent. This is a relatively low turnover rate for ADA paratransit services.

For VTS, there were 57 driver terminations in during FY 2010. Of these, 16 occurred during training, and 41 occurred post-training. Given a total driver workforce of 357 (who drove at some point during FY 2010), this yields an annual post-training turnover rate of about 14 percent.

For JV, there were 83 driver terminations in during FY 2010. Of these, 33 occurred during training, and 50 occurred post-training. Given a total driver workforce of 246, this yields an annual post-training turnover rate of about 20 percent. It is not surprising that JV has the highest turnover rate among the three contractors; in FY 2010, JV took over the operations of a previous THE RIDE contractor (as well as maintaining its own operations), so one would expect personnel changes accompanying management change.

A recent national study (TCRP Report 142) found the average annual post-training turnover rate for ADA paratransit services to be about 27 percent. All three contractors have driver turnover rates below the ADA paratransit industry average.

## Training

As noted in Chapter 9, the review team members interviewed 24 drivers, following a standard set of questions. The review team asked drivers if the training they received adequately prepared them for the job. All but one of the 24 drivers responded that they felt the training was very thorough and prepared them for the job; one driver stated that there was too little training about the MDTs and that there was substantial material missing from the class. Two drivers noted that the training did not sufficiently address defensive driving or driving in the snow.

As a group, these drivers provided a wide range of responses regarding whether and what type of refresher training the contractors provide. Five of the 24 drivers were hired too recently to receive refresher training. Six mentioned regular CPR recertification, while two drivers made note of defensive driving clinics. Four drivers said that the contractors train them on new equipment as it becomes available. Two drivers said that there is re-training every 2 years, while another driver said the training happens every year.

## 10.5 Run Coverage

Table 10.2 presents the ratios of fleet size to peak fleet for the three contractors. The ratios for both GLSS and JV are both greater than 1.20, which should be sufficient for fleets of their size. The ratio for VTS is only 1.05, which is very low. VTS compensates for this low rate by subcontracting on a daily basis when needed to Veterans Taxi, a sister company to VTS.

**Table 10.2 – The RIDE Vehicle Fleets and Peak-Fleet Needs**

<b>Contractor</b>	<b>Total Fleet</b>	<b>Peak Fleet</b>	<b>Ratio</b>
<b>GLSS</b>	201	166	1.21
<b>JV</b>	215	165	1.30
<b>VTS</b>	250	238	1.05

Peak fleet based on sample week April 25 to May 1, 2010

The ratios of drivers to peak fleet were low for the current operations of the three contractors, leading to a greater potential of uncovered runs. During the sample week analyzed by the review team, there were uncovered runs at VTS due to unscheduled driver absences. However, those dispatchers have the option of moving certain trips to Veterans Taxi (the public taxi component of VTS). This did not appear to have an adverse effect on service quality, though—as discussed in Chapter 9—monitoring by the VTS dispatchers is more difficult.

At GLSS, driver shortage had led to closed runs on a consistent basis. This could lead to potential capacity constraints and/or service quality issue. JV managers stated that JV had rarely closed runs due to lack of drivers.

## 10.6 Other Resources

### MBTA Staff

The MBTA dedicates the following staff resources to administration of THE RIDE:

- Contract Managers – 3
- Fleet Maintenance Monitoring – 1
- Financial Monitoring and Fare System Management– 1
- Field Observations of Contractor Service – 1

Contract monitors respond to customer complaints, review contractor data and reports, and monitor service in real-time via ADEPT.

Administrative staff also includes the Assistant Manager for Operations and the Deputy Director for Paratransit Operations.

While the contract managers can use the ADEPT software and the various reports from contractors to monitor service, this level of staffing appears tight for an operation of over 7,000 scheduled trips per weekday.

As discussed in Chapter 6, the average response time for processing eligibility applications and making determinations for a sample of recent determinations was 34 days, significantly longer than the goal of 21 days. OTA was planning to add a staff person to help with the application processing.

### Technology and Software

THE RIDE makes good use of software and various hardware tools. As discussed in Chapter 9, the contractors make extensive use of MDTs for communication with drivers. They are all moving toward quiet dispatch.

OTA staff manages the rider and eligibility database. Contract managers have real-time access to ADEPT data and the MBTA owns this software. The MBTA also owns the on-board cameras in all RIDE vehicles, whether the MBTA or contractor owns the vehicle. The contractors are responsible for all other equipment and facilities.

The contractors select and own their respective telephone systems, including phone service monitoring systems and callback systems. MBTA staff has the capability to directly monitor VTS calls. GLSS and JV can monitor phone service by listening to wave files. Based on review team observations, the telephone systems appear to have sufficient capacity for the current demand.

## 10.7 Planning, Budgeting, and Funding

The MBTA works on a July 1–June 30 fiscal year (FY) and the budget cycle begins the previous October. The budget for THE RIDE is a component of the MBTA’s Operations Directorate, which submits a single figure to the budget department. The budget for THE RIDE consists of staff wages and benefits, materials, services, and reimbursements to the three contractors. The contractor estimates are based on a combination of the negotiated reimbursement rates and projected ridership. According to MBTA managers, while there have been some internal negotiations on their budget requests, they receive what they need over the course of the year.

The MBTA is in the midst of 5-year contracts with the three contractors. Reimbursement is per completed trip by registered rider, with each contractor reimbursed at its negotiated per-trip rate. The MBTA reimburses the contractors separately for fuel; contractors do not have to pay the excise tax on the fuel. Additional financial transactions include the various incentives and penalties for performance and service quality. MBTA managers noted that the MBTA imposed about \$1 million in penalties and \$70,000 in incentives during FY 2010.

### Operating Budgets

Table 10.3 presents the actual expenditures for FY2008–2010 and the budget for FY2011. The large increase in cost per trip in FY2010 is due primarily to the higher reimburse rates in the new contract. As shown, contractor costs are the predominant portion of program expenditures.

The small projected increase in the FY 2011 ridership is partly due to a decrease in THE RIDE service area; two towns moved to another fixed route system. While the MBTA underestimated ridership growth in FY2009–2010, they reported that they have always provided the needed resources to meet the demand. For FY 2012–2014, the MBTA is projecting annual ridership increases of 7 percent. According to the MBTA, they have a methodology to project future ridership and costs for THE RIDE program and strive to meet their obligations.

**Table 10.3 – THE RIDE Expenditures and Ridership FY2008–FY 2011**

	<b>FY 2008</b>	<b>FY 2009</b>	<b>FY 2010</b>	<b>FY 2011 (budget)</b>
<b>MBTA wages, materials, services (\$M)</b>	<b>1.61</b>	<b>1.16</b>	<b>1.05</b>	<b>1.58</b>
<b>Contractors (\$M)</b>	<b>54.72</b>	<b>62.34</b>	<b>85.65</b>	<b>90.17</b>
<b>Total Cost (\$M)</b>	<b>56.33</b>	<b>63.50</b>	<b>86.70</b>	<b>91.75</b>
Annual increase		12.7%	36.5%	5.8%
<b>Ridership</b>	<b>1,764,113</b>	<b>1,983,489</b>	<b>2,095,998</b>	<b>2,106,801</b>
Annual increase		12.4%	5.7%	0.5%
<b>Cost/Trip</b>	<b>\$31.93</b>	<b>\$32.01</b>	<b>\$41.36</b>	<b>\$43.55</b>
Annual increase		0.3%	29.2%	5.3%

## Capital Budgets

Future capital investments for THE RIDE are set forth in the MBTA's capital investment program, currently projecting costs to FY 2015. Planned expenditures include:

- \$5.59M from ARRA funds by FY 2011 for 108 vans; some of these will replace current contractor vehicles, yielding decreased contractor costs
- \$16.05M for programmed vehicle replacement, mostly FY 2013–FY 2015
- \$890,000 for upgrading ADEPT

## 10.8 Ridership

MBTA's ADA complementary paratransit ridership in FY 2010 was 2,095,998 and its projected FY 2011 ridership is 2,106,801. To determine how this level of ridership compares with other transit agencies, the review team used a national ADA complementary paratransit ridership model to estimate the predicted ADA complementary paratransit ridership in the MBTA's ADA complementary paratransit service area.

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

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

- Service area population: 2,417,553 (2000 U.S. Census data)
- Base ADA complementary paratransit fare: \$2.00
- Service area poverty rate: 8.6 percent (U.S. census data)
- Conditional eligibility rate: 10.4 percent
- On-time window: 20 minutes
- Trip-by-trip eligibility: used

Using these factors, the TCRP model estimated the annual demand for ADA complementary paratransit service for THE RIDE to be 2,332,786 one-way trips. This is more than 11 percent higher than the MBTA's projected FY 2011 ridership for THE RIDE. A copy of the summary page from the model showing the estimation for the MBTA ADA complementary paratransit area is provided in Attachment I.

## 10.9 Recommendations

1. The MBTA and the contractors should seek ways to continually recruit and train drivers to meet the growing operational needs of THE RIDE. The ratios of drivers to peak fleet were low for the current operations of the three contractors, leading to a greater potential of uncovered runs.
2. The MBTA should ensure that it has sufficient staff to process applications for THE RIDE service.
3. The MBTA should ensure that it continues to have the resources to meet future growth in THE RIDE, for which it projects annual ridership growth of 7 percent for at least the next 3 years. It should investigate the proper application of conditional eligibility, which has a great potential for dampening ridership growth.

**Attachment A**  
**MBTA Response to Draft Report**



Deval L. Patrick, Governor  
Timothy P. Murray, Lt. Governor  
Richard A. Davey, MassDOT Secretary & CEO  
Jonathan R. Davis, Acting General Manager  
and Rail & Transit Administrator



January 17, 2012

Aaron Meyers  
Office of Civil Rights  
Federal Transit Administration  
1200 New Jersey Avenue, S.E.  
East Building, 5th Floor  
Washington, D.C. 20590

Mr. Meyers,

Thank you for providing us the opportunity to correct material statements of fact that we believe to be in error and to update you on any substantive changes to our operations/service model, rather than responding to particular findings in the report. Below is a list of our preliminary comments:

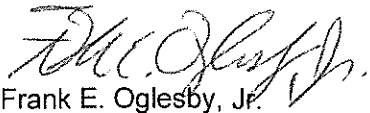
1. My title was incorrect in Section 2.2. The official transition from "Deputy Director of Customer Services for Operations" to Deputy Director of Paratransit Contract Operations took place on August 3, 2009.
2. "On Site Review" section: Count of municipalities in each vendor's service area is wrong. JV has 20 member communities, and GLSS has 23 member communities. These sums to 60 unique municipalities, since all three serve Boston. I am not sure if the square miles and population data need to be modified to reflect the change in count.
3. Section 3.1. "The fixed-route service covers 60 municipalities". The RIDE service area includes 60 municipalities, but the fixed-route network doesn't cover the entire municipality, or even serve some of them at all. (Topsfield, Medfield, ...)
4. Section 3.2. "THE RIDE is a paratransit service that operates on a door-to-door basis, without regard to trip purpose, throughout a service area consisting of 62 cities and towns." We only talk about 60 cities and towns in an earlier section. Perhaps this was copied from another document that still included Framingham and Natick.
5. Section 4.1. Please search-and-replace and remove all references to "Black Bay". The station name is "Back Bay".
6. Section 4.4. "The requirement for wheelchair securement devices for buses and cans". The intended word is vans.

2.

7. Section 5.3. Again, service area. We are in 60 cities and towns, not 62 (which include Framingham and Natick). And again, these 60 towns are more than the municipalities served by bus and rail (excluding commuter rail). Earlier in
8. The same section the auditors reference Medfield, Dover, Topsfield, and Middleton.
9. Section 6.2 Eligibility Determination and practices. Because of the FTA site visit, OTA had subsequently revised the language in these letters and transmitted copies of the revised letters to the review team.
10. Section 10.7: Planning Budgeting and Funding: The 7% estimate of ridership growth was a figure devised by the former Asst. Manager for Operations at OTA. That figure was eclipsed from the first year onward RIDE ridership was in double-digit growth levels even back then. The current working figure is 13+%. This also appears in Section 10.9 Recommendations.

Mr. Meyers, if you have any questions or concerns regarding our response, please contact me either by email at [foglesby@mbta.com](mailto:foglesby@mbta.com) or phone at (617) 222-4441. Thank you for your attention.

Truly,



Frank E. Oglesby, Jr.  
Deputy Director of Paratransit Contract Operations

**Attachment B**  
**FTA Notification Letter**



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

Headquarters

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

May 28, 2010

Mr. Richard A. Davey  
General Manager  
MBTA  
10 Park Plaza, Suite 3910  
Boston, MA 02116

Dear Mr. Davey:

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the Americans with Disabilities Act of 1990 (ADA) and the Department of Transportation's (DOT) implementing regulations at 49 CFR Parts 27, 37, and 38, as they relate to public transportation. As part of our ongoing oversight efforts, FTA's Office of Civil Rights conducts a number of on-site compliance reviews of ADA complementary paratransit services. The RIDE, the T's ADA complementary paratransit program, has been selected for such a review. The focus of the review will be MBTA's compliance with the six paratransit service criteria outlined in the DOT ADA regulations at 49 CFR § 37.131.

The overall review process will consist of the collection of data prior to the visit, an opening conference, an on-site review of MBTA's paratransit service, and an exit conference. The entire on-site portion of the review will be completed within four days. FTA has engaged the services of Planners Collaborative, Inc. (PCI), of Boston, MA, assisted by TranSystems of Boston, MA to conduct the compliance review. Representatives of PCI and TranSystems and FTA will participate in the opening and exit conferences. Ms. Susan Clark, the Program Manager for this compliance review, has already contacted your organization to notify you of the on-site visit and has confirmed **Monday, July 19, 2010**, for commencement of the on-site visit.

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

Because the members of the review team will be spending considerable time reviewing MBTA's paratransit service, it would be helpful if you could provide them with temporary identification to permit easy system access. We thank you for identifying an MBTA staff contact to coordinate the on-site review and address questions that may arise during the review. In addition, we request that a work area be made available to the team in the building where the opening and exit conferences take place.

Enclosure 1

The following information must be submitted to Planners Collaborative, Inc. by June 18, 2010.

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

## Enclosure 2

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

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

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

In order that we may properly prepare for the on-site visit, we request that you provide the information outlined in Enclosures 1 and 2. Enclosure 1 consists of items that must be received by June 21, 2010. These materials should be forwarded to:

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

Enclosure 2 consists of items that will be needed at the initiation of the review.

We request that the exit conference be scheduled for **2 p.m. on Friday, July 23, 2010**. This conference will afford an opportunity for the reviewers to discuss their observations with you and your organization. We request that you or your designee, THE RIDE paratransit service manager, the ADA coordinator, and other key staff attend the exit conference. Findings will be made by the FTA Office of Civil Rights and provided to you in a written draft at a future date. You will then have an opportunity to provide comments before the report becomes final. When the report is transmitted to MBTA in draft form, it will be a public document and subject to the Freedom of Information Act upon request.

MBTA and THE RIDE staff are welcome to accompany the review team during the review, if you so choose. We welcome your suggestions and encourage your participation in the review by asking questions or commenting on any issues you may feel are relevant. If you have any questions or concerns prior to the opening conference, please contact Susan Clark at 202-493-0511 or at her e-mail address: [sue.clark@dot.gov](mailto:sue.clark@dot.gov). You may also contact Mr. Chia whose contact information is above.

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

Sincerely,



Cheryl L. Hershey

Director

FTA Office of Civil Rights

Enclosures

cc: Mary Beth Mello, FTA Region I Acting Administrator  
Margaret Griffin, FTA Region I Civil Rights Officer  
Matthew P. Keamy, FTA Region I Director of Program Management & Oversight

## **Attachment C**

### **On-Site Review Schedule**

**ADA Complementary Paratransit Service Review**  
**Massachusetts Bay Transportation Authority (MBTA)**  
**Boston, MA**  
**July 19-27, 2010**

**Schedule**

<b>Time</b>	<b>Activity</b>	<b>Who</b>	<b>Where</b>
<b>Monday, July 19, 2010</b>			
9 a.m.	➤ Opening Conference	All	MBTA 10 Park Plaza
9:30 a.m.	➤ Review information requested and policies & procedures with MBTA and contractor managers	All	
10:30 a.m.	➤ Review MBTA oversight tasks	All	
1 p.m.	➤ Review eligibility process and records ➤ Review complaints ➤ Review data availability: telephones, trip length, on-time	Thatcher Hersey Purdy, Chia	
2 p.m.	➤ Review MBTA budget and resources ➤ Review service criteria	Chia Hersey	
<b>Tuesday, July 20, 2010</b>			
8 a.m.	➤ Tour facility	All	VTS: 224 Calvary St., Waltham
8:30 a.m.	➤ Review data availability ➤ Observe dispatch	All Thatcher	
9:30 a.m.	➤ Observe call-takers; record trip request information ➤ Review telephone system and performance	Hersey, Chia Purdy	
11 a.m.	➤ Interview scheduler ➤ Review VTS resources ➤ Interview drivers	Thatcher Chia Hersey, Purdy	
1 p.m.	➤ Analyze personnel shifts and turnover ➤ Analyze vehicle pull-out and driver availability ➤ Interview drivers	Thatcher Chia Hersey, Purdy	
3 p.m.	➤ Observe dispatch ➤ Observe call-takers; record trip request information	Thatcher, Chia Hersey, Purdy	

**ADA Complementary Paratransit Service Review  
Massachusetts Bay Transportation Authority (MBTA)  
Boston, MA  
July 19-27, 2010**

**Schedule**

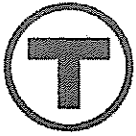
<b>Wednesday, July 21, 2010</b>			
8:30 a.m.	➤ Observe call-takers; record trip request information	Hersey, Purdy	VTS 224 Calvary St., Waltham
10 a.m.	➤ Interview drivers	Hersey, Purdy	VTS
Morning (as needed)	➤ Continue review of MBTA budget and resources ➤ Continue review of eligibility	Chia Thatcher	MBTA
Afternoon	➤ Continue follow-up interviews and analysis as needed	Hersey, Purdy	VTS
<b>Thursday, July 22, 2010</b>			
8 a.m.	➤ Tour facility	Thatcher, Purdy	GLSS 330 Lynnway, Lynn
8:30 a.m.	➤ Review data availability ➤ Observe dispatch	Purdy Thatcher	
9:30 a.m.	➤ Observe call-takers; record trip request information	Thatcher, Purdy	
11 a.m.	➤ Interview scheduler ➤ Interview drivers	Thatcher Purdy	
1 p.m.	➤ Analyze personnel shifts and turnover; review GLSS resources ➤ Interview drivers	Thatcher  Purdy	
3 p.m.	➤ Observe dispatch ➤ Observe call-takers; record trip request information	Thatcher Purdy	
8 a.m.	➤ Tour facility	Chia, Hersey	JV 110 Meadow Rd. Readville
8:30 a.m.	➤ Observe call-takers; record trip request information ➤ Review data availability	Hersey Chia	
9:30 a.m.	➤ Observe dispatch	Chia, Hersey	
11 a.m.	➤ Interview scheduler ➤ Interview drivers	Chia Hersey	
1 p.m.	➤ Analyze personnel shifts and turnover; review JV resources ➤ Interview drivers	Chia  Hersey	
3 p.m.	➤ Observe dispatch ➤ Observe call-takers; record trip request information	Chia Hersey	

**ADA Complementary Paratransit Service Review  
Massachusetts Bay Transportation Authority (MBTA)  
Boston, MA  
July 19-27, 2010**

**Schedule**

<b>Friday, July 23, 2010</b>			
8 a.m.	<ul style="list-style-type: none"> <li>➤ Observe dispatch</li> <li>➤ Observe call-takers; record trip request information</li> </ul>	Thatcher Purdy	GLSS 330 Lynnway, Lynn
9:30 a.m.	<ul style="list-style-type: none"> <li>➤ Analyze vehicle pull-out and driver availability</li> <li>➤ Review telephone system and performance</li> </ul>	Thatcher Purdy	
11 a.m. & afternoon	<ul style="list-style-type: none"> <li>➤ Conduct further data collection and interviews, as needed</li> </ul>	Thatcher, Purdy	
8 a.m.	<ul style="list-style-type: none"> <li>➤ Observe dispatch</li> <li>➤ Observe call-takers; record trip request information</li> </ul>	Chia Hersey	JV 110 Meadow Rd. Readville
9:30 a.m.	<ul style="list-style-type: none"> <li>➤ Analyze vehicle pull-out and driver availability</li> <li>➤ Review telephone system and performance</li> </ul>	Chia Hersey	
11 a.m. & afternoon	<ul style="list-style-type: none"> <li>➤ Conduct further data collection and interviews, as needed</li> </ul>	Chia, Hersey	
<b>Tuesday, July 27, 2010</b>			
Morning	<ul style="list-style-type: none"> <li>➤ Complete preliminary data analysis &amp; remaining detail work</li> <li>➤ Prepare materials for debriefing session</li> </ul>	All	MBTA
2 p.m.	<ul style="list-style-type: none"> <li>➤ Exit Conference</li> </ul>	All	MBTA

**Attachment D**  
**ADA Paratransit Eligibility Application**



# *Massachusetts Bay Transportation Authority*

Deval L. Patrick  
Governor

Timothy P. Murray  
Lt. Governor

Jeffrey B. Mullan  
MassDOT  
Secretary & CEO

John R. Jenkins  
MassDOT  
Board Chair

Richard A. Davey  
General Manager and  
Rail & Transit Administrator

Dear RIDE Applicant:

Thank you for your interest in the MBTA's **shared-ride**, door-to-door transportation program for persons with disabilities **THE RIDE**. Enclosed is the application form that you requested, along with some general information about **THE RIDE** and an instructional guide to help answer any questions you may have about completing the application form. For easy reference, the numbers within the guide correspond to the numbered questions on the application.

Please be certain that the application is fully completed by you and your licensed/certified human services or health care professional before returning it to us, so that we may review your application without delay.

If you have Internet access we encourage you to visit our website for additional applications and information about **THE RIDE** at:

[www.mbtta.com](http://www.mbtta.com), navigate to

Riding the T-Accessible Services-**THE RIDE** or call 617-222-5123

Please note this packet includes a listing of the 60 cities and towns included in the MBTA **RIDE** service area. For services in *all other* Regional Transit Authorities within Massachusetts please call 617-973-7000(V), 617-973-7306(TTY) or visit [www.eot.state.ma.us](http://www.eot.state.ma.us) navigate to Regional Transit links. Service availability, hours of service, fares and policies vary within each Regional Transit Authority (RTA). For information on possible transfer sites (MBTA - RTA) contact our office. We do not have information on agencies outside of the Commonwealth of Massachusetts.

**THE RIDE** Staff of the Office for Transportation Access



**Intentionally left blank**

## Instructions for completing THE RIDE Application

Please fill out each section of the application. Generally, you are eligible for THE RIDE if your disability makes it impossible to fully use MBTA buses, trains and streetcars some or all of the time. Therefore, it is important that you and your human service or health care professional provide as much information as possible so that the Eligibility Review Committee is able to determine eligibility.

**You must *complete* the first three (Pgs. 1-2-3) pages of THE RIDE Application, while a *licensed human service or health care professional* must *complete* the last page (Pg. 4).** Examples of licensed human service or health care professionals include those who are familiar with your disability and have been licensed (issued a license number), such as:

Medical Doctor  
Psychiatrist  
Psychologist  
Social Worker (Level III)  
Rehabilitation Professionals-Physical/Occupational Therapist, Mobility Instructor  
Physicians Assistant, Nurse Practitioner, Registered Nurse

**When completing the application, please refer to the following instructions, which correspond to the numbered sections shown on the application pages.**

1. PRINT your name, Home Address, etc. Circle **TTY** if you use a Telecommunication Tele-Typewriter Device for the Hearing Impaired (TTY) on phone lines. List your Mailing Address if different than your Home Address.
2. Enter a name and phone number for someone that can be used as an Emergency Contact, including his or her relationship to you.
3. Place a check mark by the appropriate answer.

A Personal Care Assistant (PCA) is anyone who is traveling with you to assist with your travel and/or personal needs. PCAs are not supplied by the MBTA or its RIDE Contractors, but we will provide space if you will be accompanied by one.

4. Place a check mark by each of the disabilities that apply to you.
5. If you use a mobility aid while traveling, please indicate YES or NO here. and place a check mark by all mobility aids (wheelchair, walker, crutches, etc.) that you would use while traveling on THE RIDE. If you use a powered wheelchair or a powered scooter, please include the manufacturer and model name so that we know how much space you need when using THE RIDE.

6. For these series of questions, place a check mark by "YES" if you can perform the task at all times (EXAMPLE: If you use a cane for mobility and can use a conventional auto and therefore do not require a ramp or lift to enter a vehicle).
  - Place a check mark by "NO" if you cannot perform the task under any conditions (EXAMPLE: If you use a wheelchair for mobility at all times and always require a ramp or lift to enter a vehicle).
  - Place a check mark by "SOMETIMES" if you can perform the tasks under certain conditions (EXAMPLE: If you use a wheelchair for mobility only due to temporary weakness, such as following dialysis treatments, but otherwise use a cane for mobility, then you should explain, in the space provided, that for trips to dialysis appointments you will use a wheelchair and will need a vehicle with a lift or ramp).
7. Provide as much information as possible about your disability and how it prevents you from using MBTA buses, trains and street cars, such as "I have rheumatoid arthritis and use a walker for mobility whenever leaving my house. I am not able to climb any station steps and cannot get up the steps of a streetcar".
8. If your disability is temporary, answer "YES". Be certain to fill in how many months or years you expect your disability to be present. If your disability is permanent, answer "NO" and go to section 10.
9. Sign your name to indicate that the information you have given is correct to the best of your knowledge. If you are unable to sign, you may have someone sign for you. In this instance, the person signing for you should indicate their relationship to you (EXAMPLE: PCA, Visiting Nurse, Mother, Son, etc.).

If you require your response to you to be in Large Print, in Braille or on Audio CD, please place a check mark by the format you need.

10. Sign your name to indicate that you will allow your human service or health care professional to release any necessary information. If you are unable to sign, you may have someone sign for you. Again, if someone is signing for you they should indicate their relationship to you (EXAMPLE: PCA, Visiting Nurse, Mother, Son, etc.).
11. **Page 4**, the last page of the application, is to be **completed by your Human Service or Health Care Professional**. Please be certain that it is **fully** completed, to avoid having your application returned for lack of information.

If you or your Human Service or Health Care Professional have any questions about the information requested on the application, please call the Office for Transportation Access and ask to speak with a member of THE RIDE Eligibility Review Committee.

Once your application is fully completed, please MAIL signed original to:

**MBTA Office for Transportation Access  
Ten Park Plaza, Room 5750  
Boston, Massachusetts 02116**

***NOTE: Electronic, FAX or photocopies of the application CANNOT be accepted; ONLY the signed ORIGINAL can be processed.***

Once your completed application is received, the Eligibility Review Committee will review it. If you are approved, you will be mailed a RIDE Guide with details on how to use THE RIDE. If you are found ineligible, you will be mailed a letter telling you why and instructions on how to appeal will be provided. Call the Office for Transportation Access if you have any questions about the decision or the appeals process. If no eligibility determination has been made within 21 days of receipt of a completed application, you will be provided THE RIDE service until a determination is made.

Although every effort will be made to process your application as quickly as possible, due to the large number of applications received and the length of time required to fully review and process applications, we must ask that you allow 21 days from the day we receive your application for processing.

If you or your health care provider have questions about the application or you wish to check the status of your application, please call the **Office for Transportation Access** at **800-533-6282(V)**, **617-222-5123(V)**, or **617-222-5415(TTY)** for the deaf and hard of hearing.

### **ABOUT THE SERVICE**

The MBTA's Paratransit service, THE RIDE, provides advance notice, shared-ride, door-to-door transportation to those who, because of a mental, physical or cognitive disability, are unable to use general public transportation. Wheelchair lift-equipped vans and sedans make it possible for both semi-ambulatory persons and those using wheelchairs to take advantage of this transportation service.

All drivers receive sensitivity and safety training so they may respond in a responsible and proper manner. Drivers will provide assistance into and out of vehicles and from the main entrance or lobby area of the rider's point of origin, and to the main entrance or lobby area of the rider's destination. Drivers will assist individuals who use wheelchairs, at drop off and pick up locations, up a ramp or over a maximum of one curb and/or one step (several if you are ambulatory). In addition, the driver will help with a manageable number of shopping bags, to the door of your destination.

As a customer of this shared-ride service, you will travel with other passengers on vehicles that operate within a 60 city and town service area. (See enclosed listing of communities). There are no restrictions on the types of trips you wish to take. Customers must be accepted and registered for THE RIDE and have established a RIDE account with the MBTA Revenue department, before a trip may be requested. A minimum of \$12.00 must be entered into your RIDE account and sufficient funds need to be maintained at all times to complete a desired trip. Greater detail on use of the service and how to set up an account will be provided upon completion of the registration process.

### **SERVICE PROVIDERS**

Three contractors provide THE RIDE service to our customers. Information on the contractor serving your community is included in THE RIDE Guide, which is sent to all eligible registered customers and are also listed in this package.

### **SERVICE HOURS**

RIDE service operates seven days a week (including holidays) with first pick up generally from 5:00 a.m. and ending at 1:00 a.m. (mirroring the Fixed Route schedule in your area). Call ahead to your RIDE contractor for details.

### **TRANSFERS**

Travel to and from the various service areas may require a transfer. Customers are picked up at their trip origin and taken to a transfer site where they remain on the vehicle, safe and protected from the weather, until they are met by a transfer vehicle and continue on to their destination.

### **ELIGIBILITY CRITERIA**

You must have a mental, physical or cognitive disability, which prevents you from using general public transportation. For example, extreme difficulty or inability to:

- Walk
- See
- Ride an MBTA bus
- Use stairs/escalators
- Stand in moving vehicles

You may obtain an application form and additional information concerning THE RIDE by contacting:

**MBTA Office for Transportation Access**

**Ten Park Plaza, Room 5750**

**Boston, Massachusetts 02116**

**800-533-6282(V), 617- 222-5123, or 617- 222-5415 TTY**

**Or visit our website at**

**[www.mbta.com](http://www.mbta.com) Riding the T - Accessible Services - Office for Transportation Access**

Upon successful completion of the registration process, each eligible applicant will receive a RIDE Identification number and a detailed information package, called THE RIDE Guide, describing use of THE RIDE service. Once you have received this package follow the directions in the Guide on how to set up a RIDE account. Only when your account is established will you be able to make a reservation.

### **ADDITIONAL MBTA RESOURCES**

The following MBTA programs and contacts are available to make transportation easy and accessible for all travelers:

- ✓ For our deaf and hard of hearing customers please utilize a "Relay Operator" when a TTY line is not available for your use.
- ✓ [www.mbta.com](http://www.mbta.com) 'Rider Tools' for all Transit Updates and Travel Information or 800-392-6100(V), 617-222-3200(V), 617-222-5146(TTY)
- ✓ MBTA Police Emergency: 617-222-1212(V), 617-222-1200(TTY)
- ✓ MBTA Senior and Access Program Information  
[www.mbta.com](http://www.mbta.com) Riding the T - Accessible Services Reduced Fare CharlieCard (buses, subways and trains) for seniors and persons with disabilities are available at Back Bay Station on the Orange Line. For information, call 800-543-8287(V) toll-free-in-state, 617-222-5438(V), 617-222-5854(TTY).
- ✓ Elevator / Escalator Update Line  
800-392-6100, press 6 or [www.mbta.com](http://www.mbta.com) 'Rider Tools'  
617-222-2828(V) 617-222-5854(TTY), Mon. - Fri., 8:30 a.m. - 5:00 p.m.
- ✓ For all other accessibility related questions concerning MBTA buses, subway, trains or commuter boat, or for Travel Information call 800-392-6100(V), 617-222-3200(V), 617-222-5145 TTY
- ✓ The Access Advisory Committee to the MBTA (AACT) is a consumer body composed primarily of persons with disabilities who advise and make recommendations to the MBTA regarding accessible transportation. Anyone is invited to participate. The goal of AACT is to achieve 100% accessible transportation. AACT meets monthly at the State Transportation Building, 10 Park Plaza in Boston. For meeting information or to be placed on their mailing list call 617-973-7507(V), 617-973-7089(TTY) or email [aact@ctps.org](mailto:aact@ctps.org).

### THE RIDE Cities and Towns by Service Area

<b>Boston</b>	<b>North GLSS</b>	<b>Northwest VTS</b>	<b>South JV</b>
Allston	Beverly	Arlington	Boston
Back Bay	Boston	Bedford	Braintree
Brighton	Chelsea	Belmont	Canton
Charlestown	Danvers	Boston	Cohasset
Chinatown	Everett	Brookline	Dedham
Dorchester	Lynn	Burlington	Dover
Downtown Boston	Lynnfield	Cambridge	Hingham
East Boston	Malden	Concord	Holbrook
Fenway	Marblehead	Lexington	Hull
Hyde Park	Melrose	Lincoln	Medfield
Jamaica Plain	Middleton	Medford	Milton
Mattapan	Nahant	Newton	Needham
North End	Peabody	Somerville	Norwood
Roslindale	Reading	Waltham	Quincy
Roxbury	Revere	Watertown	Randolph
South Boston	Salem	Weston	Sharon
South End	Saugus	Wilmington	Walpole
West Roxbury	Stoneham	Winchester	Wellesley
	Swampscott	Woburn	Westwood
	Topsfield		Weymouth
	Wakefield		
	Wenham		
	Winthrop		

For information on cities and towns not serviced by the MBTA RIDE program, within Massachusetts, visit the web at: [www.eot.state.ma.us](http://www.eot.state.ma.us) and navigate to Regional Transit link or call 617-973-7000, 617-973-7306 TTY, Service availability, hours of service, fares and policies vary within each Regional Transit Authority (RTA). For information on possible transfer sites (MBTA-RTA) contact our office. We do not have information on agencies outside of the Commonwealth of Massachusetts.



***Completed Original must be returned to:***  
**MBTA Office for Transportation Access**  
**Ten Park Plaza, Room 5750**  
**Boston, MA 02116**  
**800-533-6282, 617-222-5123(V)**  
**617-222-5415(TTY)**

I.D. #: \_\_\_\_\_

DATE: \_\_\_\_\_

MALE \_\_\_\_\_  
FEMALE \_\_\_\_\_

- | HOME ADDRESS | APT. # |
|--------------|--------|
|              |        |

**CITY** \_\_\_\_\_ **STATE** \_\_\_\_\_ **ZIPCODE** \_\_\_\_\_

EMAIL \_\_\_\_\_ DATE OF BIRTH \_\_\_\_\_

PHONE \_\_\_\_\_ TTY \_\_\_\_\_ TTY \_\_\_\_\_  
Home Work or Cell

MAILING ADDRESS APT#

If Different than Above

CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIPCODE \_\_\_\_\_

- [illegible]

PHONE \_\_\_\_\_ TTY \_\_\_\_\_ TTY \_\_\_\_\_  
Home Work or Cell

3. PERSONAL CARE ASSISTANT (PCA)? Yes \_\_\_\_\_ No \_\_\_\_\_ Occasionally \_\_\_\_\_

- |           |                      |                      |                   |
|-----------|----------------------|----------------------|-------------------|
| <b>4.</b> | <b>TOTALLY BLIND</b> | <b>LEGALLY BLIND</b> | <b>LOW VISION</b> |
|-----------|----------------------|----------------------|-------------------|

DIALYSIS PATIENT      HEARING IMPAIRED      DEAF

**5. DO YOU USE A MOBILITY DEVICE? YES OR NO**  
**IF YES, WHICH OF THE FOLLOWING MOBILITY AIDS OR EQUIPMENT DO YOU**  
**USE TO HELP YOU GET WHERE YOU NEED TO GO?**

(Please check all that apply)

Manual Wheelchair	_____	Walker	_____	Powered Scooter	_____
Powered Wheelchair	_____	Cane	_____	Guide Cane	_____
Prosthetic Device/Brace	_____	Crutches	_____	Oxygen	_____
Service Animal (guide dog, etc.)	_____		_____	Other	_____
Specify	_____				

**6. CAN YOU, USING THE MOBILITY DEVICES YOU IDENTIFIED ABOVE:**

**ENTER A VEHICLE WITHOUT A RAMP OR A LIFT?** Yes \_\_\_ No \_\_\_ Sometimes \_\_\_  
If sometimes, explain which conditions would prevent you \_\_\_\_\_

**WALK SAFELY 200 FEET WITHOUT THE ASSISTANCE OF ANOTHER PERSON?**  
Yes \_\_\_ No \_\_\_ Sometimes \_\_\_ If sometimes, explain which conditions would prevent you \_\_\_\_\_

**WALK SAFELY 1/4 MILE WITHOUT THE ASSISTANCE OF ANOTHER PERSON?**  
Yes \_\_\_ No \_\_\_ Sometimes \_\_\_ If sometimes, explain which conditions would prevent you \_\_\_\_\_

**WALK SAFELY 1/2 MILE WITHOUT THE ASSISTANCE OF ANOTHER PERSON?**  
Yes \_\_\_ No \_\_\_ Sometimes \_\_\_ If sometimes, explain which conditions would prevent you \_\_\_\_\_

**WALK SAFELY 3/4 MILE WITHOUT THE ASSISTANCE OF ANOTHER PERSON?**  
Yes \_\_\_ No \_\_\_ Sometimes \_\_\_ If sometimes, explain which conditions would prevent you \_\_\_\_\_

**CLIMB SAFELY THREE 12-INCH STEPS WITHOUT ASSISTANCE?**  
Yes \_\_\_ No \_\_\_ Sometimes \_\_\_ If sometimes, explain which conditions would prevent you \_\_\_\_\_

**WAIT OUTSIDE WITHOUT SUPPORT (SUCH AS A CANE, WHEELCHAIR, OXYGEN TANK) FOR TEN MINUTES?**  
Yes \_\_\_ No \_\_\_ Sometimes \_\_\_ If sometimes, explain which conditions would prevent you \_\_\_\_\_

7. WHAT IS YOUR DISABILITY AND HOW DOES IT PREVENT YOU FROM USING MBTA BUSES, SUBWAYS OR STREETCARS SOME OR ALL OF THE TIME?

\_\_\_\_\_

\_\_\_\_\_

8. IS YOUR DISABILITY TEMPORARY? Yes or No \_\_\_\_\_

IF YES, HOW LONG IS IT EXPECTED TO LAST? \_\_\_\_\_ Months \_\_\_\_\_ Years

9. I CERTIFY THAT THE INFORMATION GIVEN ABOVE IS CORRECT TO THE BEST OF MY KNOWLEDGE.

X \_\_\_\_\_  
Applicant's Signature

In our correspondence to you, which format would you prefer?

Large Print \_\_\_\_\_ Braille \_\_\_\_\_ Audio CD \_\_\_\_\_

**\*\*IMPORTANT\*\***

The information provided by your human service or health care professional **on page 4** will only be used to help the MBTA decide if you are eligible for THE RIDE and to make sure that we understand your travel needs. **If page 4 is incomplete we cannot determine your eligibility.** This personal information will only be shared with people who will be providing you with your transportation.

10. I hereby authorize my Human Service or Health Care Professional to release any information necessary to determine RIDE eligibility to the MBTA.

Applicant's Signature X \_\_\_\_\_ Date \_\_\_\_\_

The HUMAN SERVICE OR HEALTH CARE PROFESSIONAL ASSESSMENT on Page 4, must be completed in its entirety by that professional and **provide a functional assessment** of the Applicants disability in their use of regular public transportation (buses, subways, streetcars).

**PAGE 3 of 4**

11.\*\*\*TO BE COMPLETED BY HUMAN SERVICE OR HEALTH CARE PROFESSIONAL\*\*\*  
(See definition of human service or health care professional in the attached letter of introduction)

**IMPORTANT NOTICE TO HUMAN SERVICE OR HEALTH CARE PROFESSIONAL**  
Information, which you provide, will assist us in determining the applicant's **functional ability** to use public transportation. It is essential that you be as precise and comprehensive as possible in your evaluation. Thank you for your cooperation.

**PLEASE TYPE / PRINT CLEARLY**

Applicant's Name \_\_\_\_\_

Applicant's Address \_\_\_\_\_

Relationship to the Applicant \_\_\_\_\_

Please provide a narrative assessment of the applicant's **functional level of mobility**, describing any other effects of the disability, and noting whether you agree with the applicant's assessment of his/her functional ability to use MBTA buses, trains or streetcars: (if additional space is required, please add a page)

Is the Applicant able to? (If NO, please explain further)

Give information such as address and telephone number upon request? Yes\_\_\_\_ No\_\_\_\_

Recognize a destination or landmark? Yes\_\_\_\_ No\_\_\_\_

Deal with unexpected situations or unexpected change in routine? Yes\_\_\_\_ No\_\_\_\_

Ask for, understand and follow directions? Yes\_\_\_\_ No\_\_\_\_

Safely travel through crowded and/or complex MBTA facilities? Yes\_\_\_\_ No\_\_\_\_

I certify that the information given above

Is correct to the best of my knowledge.   X  

*Signature of Licensed Health Care or Human  
Services Professional*

Print clearly your contact info below:

NAME \_\_\_\_\_ BOARD  
LICENSE # \_\_\_\_\_ DATE \_\_\_\_\_

BUSINESS # \_\_\_\_\_ FAX # \_\_\_\_\_

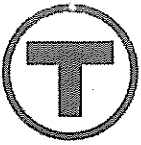
BUSINESS ADDRESS \_\_\_\_\_

Return Pages. 1- 4 to: MBTA-RIDE, Ten Park Plaza-5750, Boston, MA 02116

We cannot accept FAX Applications

PAGE 4 of 4

**Attachment E**  
**Sample Eligibility Determination Letters**  
**(Prior and Revised)**



# *Massachusetts Bay Transportation Authority*

*Deval L. Patrick*  
Governor

*Timothy P. Murray*  
Lt. Governor

*Jeffrey B. Mullan*  
MassDOT  
Secretary & CEO

*John R. Jenkins*  
MassDOT  
Board Chair

*Richard A. Davey*  
General Manager and  
Rail & Transit Administrator

July 19, 2010

Dear :

Your application for THE RIDE Paratransit service has been reviewed, and according to the information submitted you have been found ineligible for the following reason(s):

**Your application for certification of Paratransit eligibility was incomplete. Page four of the application (a copy of which is enclosed) must be completed by a licensed healthcare professional that provides a functional assessment that tells us why you are unable to use MBTA buses, subway trains and streetcars. Page four of your application was blank.**

If you have questions about this decision please call the Eligibility Review Committee at the MBTA Office for Transportation Access at (617) 222-5123 / (617) 222-5425 TTY or (800) 533-6282. A member of the committee will review your application with you and explain why the application was denied and tell you what additional information you or your healthcare professional can provide to reverse this decision. Many times the missing information can be acquired with a phone call and a decision on eligibility can be made.

If you do not agree with this decision, you have a right to appeal this determination. Any request for an appeal must be made in writing and must be postmarked within 60 days of the date of this letter, and sent to the following address:

MBTA Office for Transportation Access  
THE RIDE Eligibility Appeals Board  
Ten Park Plaza, Room 5750  
Boston, Massachusetts 02116



Page two

The enclosed description of the eligibility policy provides additional information about the appeal process. You will be granted a hearing at which time an independent Appeals Board will review your appeal.

Also, if there is any change in your ability to use MBTA bus, train and streetcar services in the future, you may submit a new application. Please contact a member of the Eligibility Review Committee with any questions by calling 617-222-5123/TTY 617-222-5415.

We regret our inability to serve you on THE RIDE at this time, and encourage you to use MBTA bus, train and streetcar service. We hope you will become a regular customer. In addition, you may be eligible for a Transportation Access Pass or a Senior Citizen Pass for reduced fares on MBTA services. Contact the Senior and Access Pass Program at 617-222-5438/TTY 617-222-5854 for more information.

Sincerely,

Dorothy M. Winn

Dorothy M. Winn  
Chairperson  
Eligibility Review Committee

## **Conditions under which applicants could be granted Conditional Eligibility for ADA Paratransit Service**

1. Weakness from dialysis treatment - Approved for return trips from dialysis only.
2. Night Blindness - Approved for trips during night hours only.
3. Inability to withstand intense cold - Approved for Months of December, January, February and March
4. Inability to withstand intense heat - Approved for Months of July and August

## **Reasons that applicants could be denied ADA Paratransit Eligibility**

1. \_\_\_\_\_ (condition and/or extent of condition) does not prevent applicant from using existing MBTA bus, train and streetcar services.
2. Applicant requires supervision. Monitors are not provided on THE RIDE.
3. Applicant must make frequent stops due to \_\_\_\_\_ (condition, e.g., frequent urination, chronic diarrhea). THE RIDE cannot make unscheduled stops.
4. Applicant must have a seat when traveling on fixed route. MBTA regular vehicles have reserved seating for persons with disabilities.

## **ADMINISTRATIVE PROCESS**

### **ADA PARATRANSIT ELIGIBILITY DETERMINATIONS**

#### **STEP ONE**

Initial review of application to determine completeness by two-person Eligibility Review Committee from Office for Transportation Access.

#### **STEP TWO**

EITHER

**A. INCOMPLETE APPLICATION**

Request to applicant to complete information absent from application.

[NOTE: Application is considered "complete" once the person has provided all of the information required.]

OR

**B. EVALUATION OF APPLICATION**

Eligibility Review Committee, comprised of two staff members from Office for Transportation Access, evaluates application using a combination of self-certification and professional certification.

Determination must be made within 21 calendar days of receipt of complete application; otherwise applicant becomes presumptively eligible for Paratransit service until determination is made.

**STEP THREE**

**DETERMINATION BY COMMITTEE**

Written notification, or accessible format if requested, provided to applicant of Committee decision.

1. Approval - Letter of ADA Paratransit Eligibility with Riders' Manual.
2. Conditional Approval - Letter of Limitations with Riders' Manual.
3. Denial - Letter of ineligibility stating reasons for denial.

In either 2 or 3 above, Letter contains notice of applicant's right to appeal, in writing, within 60 calendar days of receipt of notification.

**STEP FOUR**

**WRITTEN APPEAL**

Filed by applicant. Appeal hearing process coordinated by MBTA Office for Transportation Access staff member and mutually

acceptable hearing date scheduled. Applicant provided with written notice of hearing date. Written notice requests any accommodations that may be required by applicant (i.e., interpreter) be provided to Office for Transportation staff two weeks prior to hearing date. Applicant encouraged to provide reasons for the appeal. However, failure to do so will not preclude scheduling of hearing. Additional evidence gathered or requested, as necessary.

Opportunity to be heard and to present case to three-member Appeals Board consisting of Attorney from MBTA Law Department, Chairperson of AACT or designee, and Representative of Massachusetts Rehabilitation Commission with knowledge of disability issues of applicant.

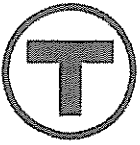
## **STEP FIVE**

### **DECISION ON APPEAL**

Three-member panel deliberates and renders decision.

Written decision, or in accessible format if requested, provided to applicant within 30 calendar days of hearing date.

If no decision reached within 30 calendar days of hearing date, applicant becomes presumptively eligible for Paratransit service until such time as decision is rendered.



# *Massachusetts Bay Transportation Authority*

Deval L. Patrick  
Governor

Timothy P. Murray  
Lt. Governor

Jeffrey B. Mullan  
MassDOT  
Secretary & CEO

John R. Jenkins  
MassDOT  
Board Chair

Richard A. Davey  
General Manager and  
Rail & Transit Administrator

Date: August 12, 2010

Dear [REDACTED]

Your application for THE RIDE Paratransit service has been reviewed, and the information that you have submitted is *incomplete* for the following reason(s):

**Page four of the application (a copy of which is enclosed) must be completed by a licensed healthcare professional that provides a functional assessment that tells us why you are unable to use MBTA buses, subway trains and streetcars. Page four of your application was blank.**

If you have questions about this decision please call the Eligibility Review Committee at the MBTA Office for Transportation Access at (617) 222-5123 / (617) 222-5425 TTY or (800) 533-6282. A member of the committee will review your application with you and explain why the application was denied and tell you what additional information you or your healthcare professional can provide to reverse this decision. Many times the missing information can be acquired with a phone call and the decision on eligibility can be made.

If you do not agree with this decision, you have a right to appeal this determination. Any request for an appeal must be made in writing and



**Attachment F**  
**Discussion of Incomplete Applications**

**Applicant #####515:** The applicant's guardian completed the application and indicated that the applicant was legally blind and also had a cognitive disability. The licensed professional confirmed that the applicant was legally blind. Regarding the applicant's cognition, the professional checked No on the questions about cognitive skills needed to use fixed route service and also wrote "functions at 6–10 year old" in the narrative question. The application was returned as ineligible/incomplete and the staff comment was that the professional had not provided adequate functional abilities information. The fact that the applicant was legally blind and also had significant cognitive issues should have indicated a decision of some level of eligibility. In addition to indicating the age level of functioning, the professional did answer all five questions in the application that request information about key cognitive skills and indicated that the applicant did not have the necessary skills to use fixed route service independently. After follow-up calls from the guardian (no formal appeal), the decision was changed to unconditional eligibility with the stipulation that the applicant be met at both ends of the trip.

**Applicant #####876:** The applicant indicated "double vision, arthritis and mental confusion at times" and checked several questions indicating limitations in using fixed route services. In the open-ended narrative, the licensed professional indicated "Intracranial aneurysm. Double vision, confused easily with directions and would not be safe on bus or train. Also, chronic back pain, osteoarthritis, can't walk ¼ mile." This description was deemed to not be complete by OTA staff. The application was sent back as ineligible/incomplete. While it may have been helpful to know more about the functional abilities of the applicant, the description provided by the professional certainly included functional information about maximum walking distance and ability to understand directions that would seem to indicate some level of eligibility. It did not seem appropriate to indicate to the applicant that the professional had not provided an adequate description of abilities. The application asks only for a narrative of applicable functional abilities. If OTA reviewers have specific functional questions beyond what is requested in the application, it would seem more appropriate to initiate follow-up contact rather than simply to return the application and hope that the professional will know what additional information is needed.

**Applicant #####071:** The applicant indicated degenerative joint disease, chronic obstructive pulmonary disease (COPD), asthma, and indicated an inability to walk one-quarter mile. In the open-ended narrative question, the licensed professional wrote, "(Applicant) is an alert, oriented x 3 elder who lives alone in supportive housing. She ambulates with a cane and has had a number of falls. Her endurance level is limited as she tires easily and becomes short of breath due to her medical diagnosis of COPD, asthma, CHF, H/O MI, CAD, Anemia, PVD. She experiences chronic daily pain due to degenerative joint disease in her spine." The professional also indicated No to the question "Safely travels through crowded or complex MBTA facilities?" The application was returned as ineligible/incomplete because it was deemed that the information provided by the professional was not adequate. The OTA reviewer also wrote "Why Not?" next to the answer by the professional about the applicant not being able to safely navigate complex facilities. In the review team's opinion, this is a fairly detailed professional statement that provides functional as well as verifying diagnostic information. From this description, it seems clear that the applicant cannot walk to and from bus stops/stations throughout the service area (potentially up to three-quarters of a mile) and that she would be at risk of falling if attempting to do so. Again, while there may be other questions about specific functional abilities that would be interesting to know (specifically if OTA were setting detailed conditions of

eligibility on maximum walking distance, street crossings, etc., but the application as presented appears to have an adequate level of detail. Without more specific questions in the application, it would be more appropriate to obtain additional information by initiating follow-up with the professional and/or applicant rather than sending the application back as incomplete and leaving it to the person and professional to ascertain what additional information the OTA reviewer would find helpful. It was also apparent that the professional was indicating that the applicant could not physically navigate through complex MBTA facilities (probably because of the risks of falling), while the OTA reviewer was interpreting the question as one dealing solely with cognition and a possible inconsistency with the statement that the applicant was “alert” and “oriented.” Such possible misinterpretations of this question would more appropriately be addressed through follow-up contact with the professional, rather than as cause to deem the application incomplete. Several application files pointed to possible misinterpretations (both by professionals and by OTA staff) of the five questions about cognitive abilities in the section to be completed by professionals.

**Applicant #####811:** The applicant indicated COPD (chronic obstructive pulmonary disease) as the disability/health condition, said she “uses oxygen 24/7,” and indicated an inability to travel more than 200 feet. The licensed professional stated, “Patient has history of COPD and is oxygen dependent. Agree with applicant’s assessment.” The application was returned as ineligible/incomplete and the OTA reviewer wrote in the margin “What prevents use of fixed route services.” Given the information provided, the question back to the applicant and professional seems out of place. The verification of the disability by the professional and the agreement with the applicant’s assessment that she cannot walk more than 200 feet would certainly seem to indicate an inability to walk to and from bus stops and train stations throughout the service area.

**Applicant #####501:** The applicant indicated use of a cane, severe arthritis, and difficulty walking and standing and said she “sometimes falls.” The licensed professional indicated, “Cane dependent for ambulation; long distances poorly tolerated; severe arthritis affecting lumbar spine and both knees. Difficulty with standing and long distance ambulation.” The professional also answered, Yes to the questions about cognitive abilities. The application was returned as incomplete and the OTA reviewer underlined the words “difficulty” and “long” in the narrative provided by the professional. The OTA reviewer also put a question mark next to the Yes answer for “Safely travel through crowded or complex MBTA facilities?” The letter back to the applicant stated, “Someone (signature illegible) signed your application (a copy of which is enclosed) and states that you can safely travel through crowded and/or complex MBTA facilities” as the reasons for determining the application ineligible/incomplete. In this case, the OTA reviewer appeared to be interpreting the answer to the question about safe travel through complex facilities as an indication of physical ability and not cognitive ability, even though it is contained in a list of five questions that are clearly aimed at cognitive abilities. It also appeared that the OTA reviewer wanted the professional to define what was meant by “difficulty” and “long” when talking about ambulatory functional ability. Without more detailed questions (like those in the section filled out by the applicant), it seems unrealistic to expect this level of detail in a short (five lines provided) open-ended narrative question. Again, given the design of the application form, it would seem more appropriate to get this additional level of detail through follow-up contact initiated by OTA rather than returning the application as ineligible/incomplete. The review team also noted that while the professional’s signature was illegible, the page did contain a printed name, license number, address, and phone number for the professional. Again,

it seems like it may have been more appropriate to call and confirm that the applicant was a patient rather than to return the application because the signature was illegible.

**Applicant #####665:** The applicant indicated a severe degenerative spine condition, use of a cane, double hip replacements, and an inability to ambulate more than 200 feet. In the open-ended narrative question, the licensed professional wrote, “(Applicant) can only ambulate with cane. She does not have the strength or balance to walk safely to bus stops or train stations. She can’t lift her legs high enough to get on bus. Still unable to walk a full block due to double hip replacement surgery 5/09. Her spine is degenerating.” The professional also answered Yes to the five questions about cognitive abilities, indicating that cognition was not an issue. The application was returned as ineligible/incomplete and the letter stated, “your healthcare provider...did not provide information which would allow us to determine your ability to use MBTA services.” The OTA reviewer also had written “All MBTA buses are ramp + lift equipped. No stairs required” with a line to the professional’s statement that the applicant could not lift her legs high enough to get on a bus. The OTA reviewer also put a question mark next to the answer that the applicant could safely travel through crowded or complex MBTA facilities. The reason for returning the application and the note about ramp/lift equipped buses seemed inappropriate given the information provided. The narrative provided by the professional not only included functional information, it included very detailed information—even stating that the applicant could not manage one full block. In addition, given that the issue was really an inability to get to and from bus stops and train stations, the note about buses being lift/ramp-equipped seemed peripheral at best. The question mark next to the answer about being able to safely navigate complex facilities again appears to indicate that the OTA reviewer was interpreting this as an indication of physical ability and a possible conflict with the other information provided (rather than as an indication of cognition since the question is one of five about cognitive skills).

**Applicant #####471:** The applicant indicated that he is legally blind and that in some places buses, subways and streetcars were not available to him. He did not indicate any limitations in walking endurance, noting that he could walk up to three-quarters of a mile. The licensed professional wrote “Best correction visual acuity hand motion OD & OS. Legally blind. Tunnel visual field OU. Both conditions are resulted from Pigmentosa Retinitis. The condition is permanent.” The professional also indicated in the five questions below the narrative question that the applicant could not recognize destinations or landmarks, could not deal with unexpected situations or changes in routine, and could not safely travel through crowded or complex MBTA facilities. Sensing that the questions were more geared to cognitive abilities, the professional also added, “The answer No is due to his limited visual ability” below these questions. The application was returned as ineligible/incomplete and the letter stated, “(Healthcare provider)...did not provide information which would allow us to determine your ability to use MBTA services.” The OTA reviewer also added a note to the application that read, “Applicant states he walks ¾ miles safely with his cane.” The review of this file indicated that the professional had provided detailed visual acuity information that suggested very limited vision (hand motion) and, in answering the questions below the narrative question, indicated that the applicant could not recognize landmarks and could not navigate complex facilities. This information seemed sufficient to justify some level of eligibility (perhaps for trips to places with which the applicant was not familiar). The issue with being able to ambulate three-quarters of a mile seems irrelevant given that the disability is not related to endurance but to vision and wayfinding.

**Attachment G**  
**Sample Telephone Performance Reports**



Last Refresh: 5/18/2010

User: IVT

## I/C + Xfer by Target Group

From: 5/17/2010 8:00:48AM To: 5/17/2010 4:59:39PM 12:00:00AM To: 11:59:59PM

Target: Reservation

PCA: 150

*Mon*

Date / Time	I/C Presented + Xfer	I/C Answered + Xfer	I/C Lost	I/C Answered (%)	I/C Lost (%)	Average I/C Duration	Average Wait Answered	Average Wait Lost	Calls Ans Within 60	Calls Ans Within 120	Calls Ans Within 150	Calls Ans Within 240	Calls Ans Within 300	Call Ans + 300	Longest Waiting Answered	PCA
5/17/2010 08:00	51	51	0	100.00%	0.00%	0:01:45	0:07:04	0:00:00	0	0	1	7	5	38	0:15:17	1.96%
5/17/2010 09:00	140	140	0	100.00%	0.00%	0:01:58	0:02:00	0:00:00	24	49	22	43	2	0	0:04:16	67.86%
5/17/2010 10:00	144	144	0	100.00%	0.00%	0:01:56	0:02:46	0:00:00	15	25	17	56	31	0	0:04:52	39.58%
5/17/2010 11:00	155	155	0	100.00%	0.00%	0:01:49	0:01:04	0:00:00	85	46	19	5	0	0	0:02:57	96.77%
5/17/2010 12:00	127	127	0	100.00%	0.00%	0:01:44	0:00:47	0:00:00	82	31	10	4	0	0	0:02:53	96.85%
5/17/2010 13:00	152	152	0	100.00%	0.00%	0:02:01	0:01:30	0:00:00	55	48	27	21	1	0	0:04:02	85.53%
5/17/2010 14:00	160	160	0	100.00%	0.00%	0:02:09	0:03:08	0:00:00	4	22	16	90	19	9	0:05:53	26.25%
5/17/2010 15:00	166	166	0	100.00%	0.00%	0:02:09	0:02:44	0:00:00	14	25	26	79	22	0	0:04:59	39.16%
5/17/2010 16:00	128	128	0	100.00%	0.00%	0:01:45	0:00:55	0:00:00	79	32	11	6	0	0	0:03:06	95.31%
Totals:	1223	1,223	0	100.00%	0.00%	0:01:57	0:02:08	0:00:00	358	278	149	311	80	47	0:15:17	64.19%



Last Refresh: 5/19/2010

User: INT

## IC + Xfer by Target Group

From: 5/18/2010 8:00:51AM To: 5/18/2010 4:59:34PM 12:00:00AM To: 4:59:59PM

Target: Reservation

PCA: 150

TUE

Date / Time	IC Presented + Xfer	IC Answered + Xfer	IC Lost	IC Answered (%)	IC Lost (%)	Average IC Duration	Average Wait Answered	Average Wait Lost	Calls Ans Within 60	Calls Ans Within 120	Calls Ans Within 150	Calls Ans Within 240	Calls Ans Within 300	Call Ans + 300	Longest Waiting Answered	PCA
5/18/2010 08:00	73	73	0	100.00%	0.00%	0:01:43	0:03:30	0:00:00	24	4	1	9	13	22	0:19:45	39.73%
5/18/2010 09:00	136	136	0	100.00%	0.00%	0:01:57	0:00:15	0:00:00	131	5	0	0	0	0	0:01:17	100.00%
5/18/2010 10:00	126	126	0	100.00%	0.00%	0:01:35	0:00:13	0:00:00	121	5	0	0	0	0	0:01:40	100.00%
5/18/2010 11:00	120	120	0	100.00%	0.00%	0:01:55	0:00:29	0:00:00	98	21	1	0	0	0	0:02:11	100.00%
5/18/2010 12:00	123	123	0	100.00%	0.00%	0:01:48	0:01:04	0:00:00	82	24	1	6	10	0	0:04:36	86.99%
5/18/2010 13:00	140	140	0	100.00%	0.00%	0:01:39	0:00:58	0:00:00	79	41	14	6	0	0	0:02:56	95.71%
5/18/2010 14:00	149	149	0	100.00%	0.00%	0:02:14	0:00:57	0:00:00	92	37	11	9	0	0	0:03:30	93.96%
5/18/2010 15:00	155	155	0	100.00%	0.00%	0:02:02	0:00:36	0:00:00	117	37	1	0	0	0	0:02:06	100.00%
5/18/2010 16:00	130	130	0	100.00%	0.00%	0:01:59	0:00:23	0:00:00	119	9	2	0	0	0	0:02:22	100.00%
Totals:	1152	1,152	0	100.00%	0.00%	0:01:54	0:00:48	0:00:00	863	183	31	30	23	22	0:19:45	93.49%



Last Refresh: 5/20/2010

User: IVT

## I/C + Xfer by Target Group

From: 5/19/2010 8:00:22AM To: 5/19/2010 4:59:29PM

12:00:00AM

To: 11:59:59PM

Target: Reservation

PCA: 150

*wed*

Date / Time	I/C Presented + Xfer	I/C Answered + Xfer	I/C Lost	I/C Answered (%)	I/C Lost (%)	Average I/C Duration	Average Wait Answered	Average Wait Lost	Calls Ans Within 60	Calls Ans Within 120	Calls Ans Within 150	Calls Ans Within 240	Calls Ans Within 300	Call Ans + 300	Longest Waiting Answered	PCA
5/19/2010 08:00	79	79	0	100.00%	0.00%	0:01:33	0:03:31	0:00:00	3	14	18	29	10	5	0:23:46	44.30%
5/19/2010 09:00	114	114	0	100.00%	0.00%	0:01:48	0:00:12	0:00:00	112	2	0	0	0	0	0:01:11	100.00%
5/19/2010 10:00	125	125	0	100.00%	0.00%	0:01:54	0:00:53	0:00:00	80	29	6	10	0	0	0:03:59	92.00%
5/19/2010 11:00	121	121	0	100.00%	0.00%	0:02:06	0:00:33	0:00:00	102	11	3	5	0	0	0:03:50	95.87%
5/19/2010 12:00	118	118	0	100.00%	0.00%	0:01:45	0:00:16	0:00:00	114	4	0	0	0	0	0:01:44	100.00%
5/19/2010 13:00	153	153	0	100.00%	0.00%	0:02:01	0:00:51	0:00:00	89	59	5	0	0	0	0:02:26	100.00%
5/19/2010 14:00	172	172	0	100.00%	0.00%	0:01:58	0:00:56	0:00:00	92	71	5	4	0	0	0:03:05	97.67%
5/19/2010 15:00	186	186	0	100.00%	0.00%	0:02:01	0:00:46	0:00:00	129	45	8	4	0	0	0:02:39	97.85%
5/19/2010 16:00	136	136	0	100.00%	0.00%	0:02:05	0:00:21	0:00:00	126	9	1	0	0	0	0:02:13	100.00%
Totals:	1204	1,204	0	100.00%	0.00%	0:01:56	0:00:49	0:00:00	847	244	46	52	10	5	0:23:46	94.44%



Last Refresh: 5/21/2010

User: IVT

## I/C + Xfer by Target Group

From: 5/20/2010 8:00:48AM To: 5/20/2010 4:59:33PM

12:00:00AM

To: 11:59:59PM

Target: Reservation

PCA: 150

*Thurs*

Date / Time	I/C Presented + Xfer	I/C Answered + Xfer	I/C Lost	I/C Answered (%)	I/C Lost (%)	Average I/C Duration	Average Wait Answered	Average Wait Lost	Calls Ans Within 60	Calls Ans Within 120	Calls Ans Within 150	Calls Ans Within 240	Calls Ans Within 300	Call Ans + 300	Longest Waiting Answered	PCA
5/20/2010 08:00	72	72	0	100.00%	0.00%	0:02:02	0:05:38	0:00:00	0	0	2	13	18	39	0:26:58	2.78%
5/20/2010 09:00	133	133	0	100.00%	0.00%	0:01:53	0:00:43	0:00:00	102	15	7	9	0	0	0:03:36	93.23%
5/20/2010 10:00	146	146	0	100.00%	0.00%	0:01:54	0:01:22	0:00:00	74	29	11	22	10	0	0:04:56	78.08%
5/20/2010 11:00	137	137	0	100.00%	0.00%	0:01:41	0:00:40	0:00:00	104	26	4	3	0	0	0:03:11	97.81%
5/20/2010 12:00	122	122	0	100.00%	0.00%	0:01:54	0:00:26	0:00:00	106	16	0	0	0	0	0:01:44	100.00%
5/20/2010 13:00	135	135	0	100.00%	0.00%	0:01:51	0:00:31	0:00:00	107	26	2	0	0	0	0:02:22	100.00%
5/20/2010 14:00	165	165	0	100.00%	0.00%	0:02:05	0:00:37	0:00:00	130	34	1	0	0	0	0:02:05	100.00%
5/20/2010 15:00	165	165	0	100.00%	0.00%	0:01:59	0:00:31	0:00:00	139	21	4	1	0	0	0:02:31	99.39%
5/20/2010 16:00	141	141	0	100.00%	0.00%	0:01:48	0:00:09	0:00:00	141	0	0	0	0	0	0:00:57	100.00%
Totals:	1216	1,216	0	100.00%	0.00%	0:01:54	0:00:55	0:00:00	903	167	31	48	28	39	0:26:58	90.54%



# NC + Xfer by Target Group

From: 5/21/2010 8:00:04AM To: 5/21/2010 4:59:13PM

12:00:00AM

To: 11:59:59PM

Target: Reservation

PCA: 150

*Friday*

Date / Time	I/C Presented + Xfer	I/C Answered + Xfer	I/C Lost	I/C Answered (%)	I/C Lost (%)	Average I/C Duration	Average Wait Answered	Average Wait Lost	Calls Ans Within 60	Calls Ans Within 120	Calls Ans Within 150	Calls Ans Within 240	Calls Ans Within 300	Call Ans + 300	Longest Waiting Answered	PCA
5/21/2010 08:00	53	53	0	100.00%	0.00%	0:02:16	0:05:24	0:00:00	0	0	0	7	18	28	0:19:16	0.00%
5/21/2010 09:00	128	128	0	100.00%	0.00%	0:02:00	0:01:46	0:00:00	38	37	15	32	6	0	0:04:38	70.31%
5/21/2010 10:00	104	104	0	100.00%	0.00%	0:02:25	0:02:17	0:00:00	27	19	11	32	8	7	0:06:51	54.81%
5/21/2010 11:00	127	127	0	100.00%	0.00%	0:02:08	0:01:25	0:00:00	53	42	11	21	0	0	0:03:26	83.46%
5/21/2010 12:00	132	132	0	100.00%	0.00%	0:01:48	0:00:55	0:00:00	72	52	7	1	0	0	0:02:42	99.24%
5/21/2010 13:00	131	131	0	100.00%	0.00%	0:01:59	0:01:41	0:00:00	37	43	18	32	1	0	0:04:09	74.81%
5/21/2010 14:00	143	143	0	100.00%	0.00%	0:02:17	0:01:36	0:00:00	53	39	15	32	4	0	0:04:19	74.83%
5/21/2010 15:00	127	127	0	100.00%	0.00%	0:02:09	0:01:32	0:00:00	47	43	18	12	7	0	0:04:58	85.04%
5/21/2010 16:00	142	142	0	100.00%	0.00%	0:02:03	0:01:16	0:00:00	66	34	24	18	0	0	0:03:30	87.32%
Totals:	1087	1,087	0	100.00%	0.00%	0:02:06	0:01:44	0:00:00	393	309	119	187	44	35	0:19:16	75.53%



Last Refresh: 5/23/2010

User: IVT

## I/C + Xfer by Target Group

From: 5/22/2010 8:00:17AM To: 5/22/2010 4:58:53PM 12:00:00AM To: 11:59:59PM

Target: Reservation

PCA: 150

SAT

Date / Time	I/C Presented + Xfer	I/C Answered + Xfer	I/C Lost	I/C Answered (%)	I/C Lost (%)	Average I/C Duration	Average Wait Answered	Average Wait Lost	Calls Ans Within 60	Calls Ans Within 120	Calls Ans Within 150	Calls Ans Within 240	Calls Ans Within 300	Call Ans + 300	Longest Waiting Answered	PCA
5/22/2010 08:00	44	44	0	100.00%	0.00%	0:01:46	0:02:07	0:00:00	23	4	1	9	4	3	0:16:12	63.64%
5/22/2010 09:00	100	100	0	100.00%	0.00%	0:01:56	0:00:38	0:00:00	74	25	1	0	0	0	0:02:02	100.00%
5/22/2010 10:00	81	81	0	100.00%	0.00%	0:01:55	0:00:42	0:00:00	62	12	3	4	0	0	0:03:58	95.06%
5/22/2010 11:00	97	97	0	100.00%	0.00%	0:01:46	0:01:10	0:00:00	63	17	3	4	3	7	0:07:17	85.57%
5/22/2010 12:00	83	83	0	100.00%	0.00%	0:01:30	0:01:31	0:00:00	50	10	3	6	10	4	0:06:32	75.90%
5/22/2010 13:00	133	133	0	100.00%	0.00%	0:01:18	0:00:47	0:00:00	94	26	7	6	0	0	0:03:09	95.49%
5/22/2010 14:00	88	88	0	100.00%	0.00%	0:02:08	0:00:39	0:00:00	67	15	4	2	0	0	0:02:55	97.73%
5/22/2010 15:00	74	74	0	100.00%	0.00%	0:01:38	0:00:26	0:00:00	64	4	4	2	0	0	0:02:36	97.30%
5/22/2010 16:00	78	78	0	100.00%	0.00%	0:01:40	0:00:19	0:00:00	71	7	0	0	0	0	0:01:40	100.00%
Totals:	778	778	0	100.00%	0.00%	0:01:43	0:00:52	0:00:00	568	120	26	33	17	14	0:16:12	91.77%



Last Refresh: 5/24/2010

User: IVT

## I/C + Xfer by Target Group

From: 5/23/2010 8:03:41AM To: 5/23/2010 4:59:44PM 12:00:00AM To: 11:59:59PM

Target: Reservation

PCA: 150

*Sunday*

Date / Time	I/C Presented + Xfer	I/C Answered + Xfer	I/C Lost	I/C Answered (%)	I/C Lost (%)	Average I/C Duration	Average Wait Answered	Average Wait Lost	Calls Ans Within 60	Calls Ans Within 120	Calls Ans Within 150	Calls Ans Within 240	Calls Ans Within 300	Call Ans + 300	Longest Waiting Answered	PCA
5/23/2010 08:00	44	44	0	100.00%	0.00%	0:01:46	0:01:53	0:00:00	17	8	3	13	2	1	0:05:11	63.64%
5/23/2010 09:00	86	86	0	100.00%	0.00%	0:01:32	0:00:13	0:00:00	83	3	0	0	0	0	0:01:42	100.00%
5/23/2010 10:00	71	71	0	100.00%	0.00%	0:01:42	0:00:11	0:00:00	69	2	0	0	0	0	0:01:30	100.00%
5/23/2010 11:00	78	78	0	100.00%	0.00%	0:01:22	0:00:11	0:00:00	78	0	0	0	0	0	0:00:54	100.00%
5/23/2010 12:00	73	73	0	100.00%	0.00%	0:01:54	0:00:22	0:00:00	66	7	0	0	0	0	0:02:00	100.00%
5/23/2010 13:00	93	93	0	100.00%	0.00%	0:01:47	0:00:29	0:00:00	75	18	0	0	0	0	0:01:52	100.00%
5/23/2010 14:00	129	129	0	100.00%	0.00%	0:01:37	0:00:42	0:00:00	96	23	4	6	0	0	0:03:49	95.35%
5/23/2010 15:00	86	86	0	100.00%	0.00%	0:01:56	0:00:24	0:00:00	78	5	3	0	0	0	0:02:25	100.00%
5/23/2010 16:00	81	81	0	100.00%	0.00%	0:01:32	0:00:26	0:00:00	65	14	1	1	0	0	0:02:36	98.77%
Totals:	741	741	0	100.00%	0.00%	0:01:40	0:00:29	0:00:00	627	80	11	20	2	1	0:05:11	96.90%



Last Refresh: 5/25/2010

User: INT

## IC + Xfer by Target Group

From: 5/24/2010 8:01:12AM To: 5/24/2010 4:59:37PM

12:00:00AM

To: 11:59:59PM

Target: Reservation

PCA: 150

*Mon*

Date / Time	I/C Presented + Xfer	I/C Answered + Xfer	I/C Lost	I/C Answered (%)	I/C Lost (%)	Average I/C Duration	Average Wait Answered	Average Wait Lost	Calls Ans Within 60	Calls Ans Within 120	Calls Ans Within 150	Calls Ans Within 240	Calls Ans Within 300	Call Ans + 300	Longest Waiting Answered	PCA
5/24/2010 08:00	84	82	2	97.62%	2.38%	0:01:57	0:04:54	0:03:19	0	0	1	28	13	40	0:07:22	1.22%
5/24/2010 09:00	145	144	1	99.31%	0.69%	0:01:53	0:02:47	0:02:25	11	34	23	50	13	13	0:06:00	47.22%
5/24/2010 10:00	131	131	0	100.00%	0.00%	0:02:04	0:04:20	0:00:00	6	16	3	18	24	64	0:07:02	19.08%
5/24/2010 11:00	157	152	5	96.82%	3.18%	0:02:00	0:03:51	0:02:06	3	13	7	56	45	28	0:07:01	15.13%
5/24/2010 12:00	140	140	0	100.00%	0.00%	0:01:52	0:01:30	0:00:00	59	42	11	24	4	0	0:04:26	80.00%
5/24/2010 13:00	125	125	0	100.00%	0.00%	0:02:22	0:01:07	0:00:00	70	26	13	16	0	0	0:03:12	87.20%
5/24/2010 14:00	164	162	2	98.78%	1.22%	0:02:07	0:02:24	0:01:27	22	36	14	87	3	0	0:04:42	44.44%
5/24/2010 15:00	154	154	0	100.00%	0.00%	0:02:24	0:02:19	0:00:00	32	28	22	57	12	3	0:05:09	53.25%
5/24/2010 16:00	139	139	0	100.00%	0.00%	0:02:12	0:01:28	0:00:00	52	47	20	20	0	0	0:03:41	85.61%
Totals:	1239	1,229	10	99.19%	0.81%	0:02:06	0:02:39	0:02:14	255	242	114	356	114	148	0:07:22	49.72%



Last Refresh: 5/26/2010

User: IVT

## I/C + Xfer by Target Group

From: 5/25/2010 8:03:33AM To: 5/25/2010 4:58:31PM 12:00:00AM To: 11:59:59PM

Target: Reservation

PCA: 150

TUE

Date/Time	I/C Presented + Xfer	I/C Answered + Xfer	I/C Lost	I/C Answered (%)	I/C Lost (%)	Average I/C Duration	Average Wait Answered	Average Wait Lost	Calls Ans Within 60	Calls Ans Within 120	Calls Ans Within 150	Calls Ans Within 240	Calls Ans Within 300	Call Ans + 300	Longest Waiting Answered	PCA
5/25/2010 08:00	81	81	0	100.00%	0.00%	0:01:54	0:03:20	0:00:00	14	10	5	29	15	8	0:13:14	35.80%
5/25/2010 09:00	151	151	0	100.00%	0.00%	0:01:52	0:00:43	0:00:00	118	20	3	10	0	0	0:03:29	93.38%
5/25/2010 10:00	129	129	0	100.00%	0.00%	0:01:48	0:00:55	0:00:00	73	41	11	4	0	0	0:02:45	96.90%
5/25/2010 11:00	143	143	0	100.00%	0.00%	0:01:45	0:00:44	0:00:00	102	34	2	5	0	0	0:03:17	96.50%
5/25/2010 12:00	145	145	0	100.00%	0.00%	0:01:54	0:01:10	0:00:00	76	37	7	24	1	0	0:04:05	82.76%
5/25/2010 13:00	131	131	0	100.00%	0.00%	0:02:12	0:01:10	0:00:00	68	41	11	10	1	0	0:04:02	91.60%
5/25/2010 14:00	153	153	0	100.00%	0.00%	0:02:06	0:01:35	0:00:00	47	55	19	30	2	0	0:04:11	79.08%
5/25/2010 15:00	153	153	0	100.00%	0.00%	0:02:10	0:01:37	0:00:00	40	58	30	25	0	0	0:03:42	83.66%
5/25/2010 16:00	162	162	0	100.00%	0.00%	0:01:59	0:01:05	0:00:00	76	70	9	7	0	0	0:02:54	95.68%
Totals:	1248	1,248	0	100.00%	0.00%	0:01:58	0:01:16	0:00:00	614	366	97	144	19	8	0:13:14	86.30%

**Attachment H**  
**Driver Interview Form**

## ADA Complementary Paratransit Review

Site: MBTA RIDE

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 pickup?"
7. Do riders seem to understand the pickup 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?
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 I**  
**ADA Complementary Paratransit Demand Estimate**

## TCRP Project B-28

### Input Values

ADA service area population (2000 Census)	2,417,553
Base fare for ADA paratransit (Dollars)	\$2.00
conditionally eligible	9.6
Conditional trip determination	1
Percent of the population in the ADA service area in households with 1999-2000 income below the poverty line	8.60%
Effective on-time window for ADA paratransit (minutes)	20

### Results

Predicted Annual Ridership per Capita	0.96
Predicted Annual Ridership	2,332,786

### Confidence Intervals for Mean Value for Systems with the Characteristics Entered

	Trips per Capita	Annual Ridership
Upper 95% confidence limit	1.77	4,286,389
Upper 90% confidence limit	1.60	3,860,499
Lower 90% confidence limit	0.58	1,409,634
Lower 95% confidence limit	0.53	1,269,574
Actual 2010 ridership		2,095,998
Projected 2011 ridership		2,106,801