



F E D E R A L T R A N S I T A D M I N I S T R A T I O N

Metropolitan Council
Paratransit Compliance Review Final Report
March 17, 2014

Federal Transit Administration



U.S. Department of Transportation
Federal Transit Administration

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Executive Summary

Purpose

This report reviews Metropolitan Council's Metro Mobility complementary paratransit service in the Minneapolis/St. Paul, Minnesota metropolitan area. Its objective is to verify whether Metropolitan Council (Met Council) is meeting its obligations under the ADA to provide paratransit as a complement to its fixed route service.

This compliance review included three stages:

1. Preparation: compilation of information covering policies and procedures and interviews with eligible Metro Mobility riders and local disability organizations
2. Site visit: a three-person review team's observations of how Metro Mobility handles trip requests, scheduling and dispatching, examinations of eligibility applications and related documents (including appeals), and interviews with Met Council, Metro Mobility, and contractor employees
3. Analysis and reporting: using site visit data, identification of deficiencies requiring corrective actions and suggestions of effective practices in complementary paratransit service

Key Findings

During the review team's visit, Met Council representatives were committed to providing high-quality paratransit service as a complement to its fixed route service. The review team also observed that:

- Met Council provides sufficient financial resources to operate Metro Mobility service
- Metro Mobility's in-person assessment process for determining ADA paratransit eligibility is thorough and well run, enabling them to process all eligibility applications within 21 days of receipt
- Metro Mobility's service is "first door-through-first door service," which exceeds the DOT ADA requirements
- Metro Mobility drivers are well trained and understand their job responsibilities

The review identified the following deficiencies that Met Council can correct immediately:

- Letters determining eligibility and explaining appeal decisions do not include all of the language the regulations require
- Inconsistent with Met Council's normal business hours, three service providers do not accept telephone calls between 4 and 5 p.m. on weekends
- Some policies and procedures regarding what constitutes a no-show, how no-shows affect subsequent trips, and how suspensions for no-shows are reviewed are not compliant
- Existing performance standards for excessively long trips and long telephone hold times do not properly ensure compliant service

The review also identified the following deficiencies that Met Council must address:

- In Metro Transit's free-fare and reduced-fare zones, Metro Mobility fares exceed twice the fixed route fare
- Some of Metro Mobility's agency trips exhibit a potential pattern of excessively long trips for particular riders

- Several service providers are not meeting the Metro Mobility standard for on-time drop-offs, particularly for very early drop-offs
- Service provider monitoring is deficient in several areas of service delivery, including excessively long trips, telephone hold times, and untimely drop-offs

Please see Section 5 for a discussion of all 36 deficiencies. The Summary Table of Compliance Review Findings (following Section 5) lists all findings. Met Council must address all deficiencies within 60 days of receipt of this report.

1 General Information

This chapter provides basic information concerning this Metropolitan Council compliance review. Information on the Metropolitan Council, the review team, and the dates of the review are presented below.

Grant Recipient:	Metropolitan Council (Met Council)
City/State:	Saint Paul, Minnesota
Grantee Number:	5155
Executive Official:	Patrick Born, Regional Administrator
On-site Liaison:	Kathleen Shea, Director, Program Evaluation and Audit
Report Prepared By:	the Collaborative, Inc.
Dates of Site visit:	September 30–October 4, 2013
Review Team Members:	David Chia, the Collaborative, Inc. James Purdy, the Collaborative, Inc. Russell Thatcher, TranSystems Corp.

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2 Jurisdiction and Authorities

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 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, 38, and 39) include eligibility requirements and service criteria that must be met by complementary paratransit service programs. Section 37.135(d) of the regulations required that complementary paratransit service 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.

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3 Introduction to Metropolitan Council

Metropolitan Council (Met Council) is a public agency with a range of responsibilities in the seven-county Minneapolis-St. Paul, MN metropolitan area, including regional planning, parks management, affordable housing, water supply planning and wastewater treatment, and public transportation service.

The fixed route system (Metro Transit) includes bus, light rail, and commuter rail service. Met Council also operates the Transit Link general public demand responsive service and Metro Mobility, the complementary paratransit service, which is the subject of this compliance review. Based on ridership, Metro Transit is the 12th largest fixed route operator in the United States. According to its website, Met Council provided 81 million passenger trips in Fiscal Year (FY) 2012 (January–December), with approximately 70 million trips by bus. According to FTA’s National Transit Database (NTD), Metro Transit’s service area is 2,975 square miles, with a population of 2,849,567.



Metro Mobility van and website [link](#)

3.1 Introduction to Complementary Paratransit Services and Organizational Structure

According to NTD, Metro Mobility serves 2,314,701 people in a 1,111-square mile six-county service area with a 400-vehicle fleet of small buses and sedans. Metro Mobility includes some non-ADA service. In FY 2012, Metro Mobility provided 1.71 million complementary paratransit trips. At the time of the review team’s site visit (October 2013), Metro Mobility had approximately 35,000 ADA paratransit eligible riders in its database.

Five complementary paratransit service providers operate under contract to Met Council. DARTS, Transit Team, and First Transit are private entities and Anoka and Scott Counties are public entities. These service providers cover the following five geographic regions (see Figure 3.1):

- Anoka County
- Dakota County (DARTS)
- West Metro: primarily Hennepin County (Transit Team)
- East Metro: primarily Ramsey and Washington Counties (First Transit)
- Scott County

Metro Mobility service providers are responsible for:

- Accepting and scheduling trip requests
- Hiring and training drivers
- Dispatching vehicles
- Maintaining vehicles

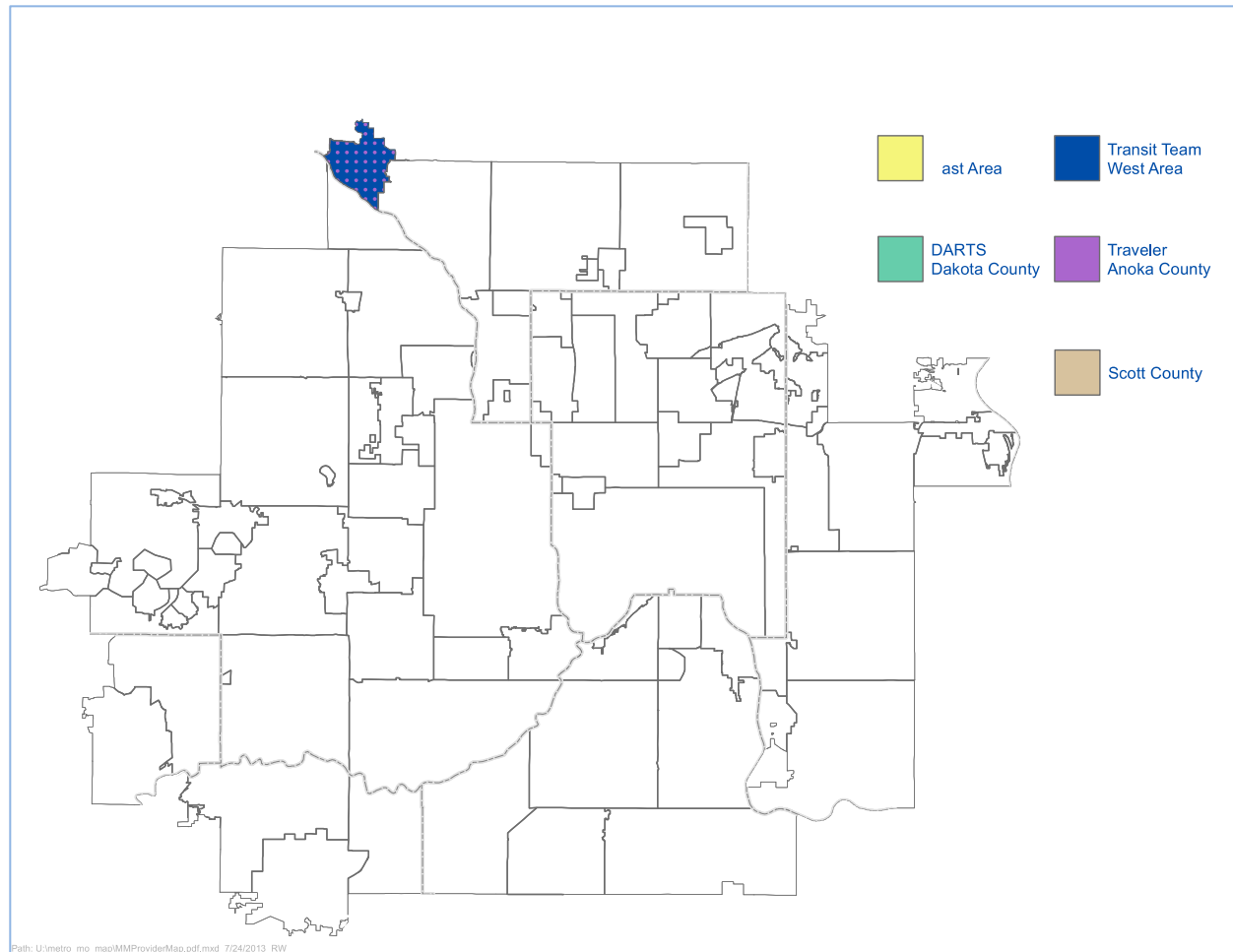


Figure 3.1 – Metro Mobility Service Provider and Service Area Map

Metro Mobility staff, based in Met Council’s St. Paul office, determines ADA paratransit eligibility and monitors service provider operations. (See Sections 5.12 and 5.13 regarding Met Council’s respective oversight of its private and public service providers.) Met Council owns the vehicle fleet, telephone systems, computer hardware, and paratransit software. Met Council also resolves complaints, maintains complaint records, and oversees the appeal process.

The majority of Metro Mobility’s trips occur in Hennepin (including Minneapolis), Ramsey (including St. Paul), and Washington Counties, with some overlap in service areas. Metro Mobility assigns riders to service providers (known as “home carriers”) based on where riders reside. For trips between East Metro and West Metro, home carriers provide complete trips (i.e., no transfers) along with any requested return trips. Trips between East Metro or West Metro and Anoka, Dakota, or Scott Counties require transfers, although home carriers can opt to provide entire trips. Fares for transfer and non-transfer trips are the same.

Met Council also contracts with First Transit to provide what it defines as “agency trips.” According to Met Council’s contract for agency services:

“Agency” means a day training and rehabilitation center, adult day care center, or other high volume social service agency designated by the Council to be provided Metro Mobility Agency Service by the Contractor.

“Agency Trip” means a one-way trip for an ADA-certified rider from a designated pickup point that is to be delivered by the Contractor. An Agency trip is initiated through a request by a participating Agency to establish a regularly scheduled set of trips.

All of Metro Mobility’s agency trips are subscription service trips. First Transit provides contracted agency trips throughout Metro Mobility’s service area for riders traveling to participating agencies — regardless of location or the rider’s home address. Riders that First Transit serves for agency trips must use their home carrier for non-agency trips.

First Transit, which also serves East Metro for complementary paratransit service (“demand service”), operates out of one facility. Some drivers, staff, and equipment serve both operations, but First Transit uses separate fleets; with Met Council’s prior approval, First Transit may temporarily reassign vehicles from one service to the other.

For a small portion of its ADA paratransit service, Met Council contracts with Taxi Services, Inc. to serve “peak demand overflow” trips that its other contractors cannot serve.

Table 3.1 summarizes Metro Mobility ADA paratransit ridership by service provider for FY 2012 and the first eight months of FY 2013. This table includes H.S.I., Washington County’s service provider during FY 2012; First Transit began providing these trips late in FY 2013.

Table 3.1 – Metro Mobility ADA Paratransit Ridership

Service Provider	FY 2012		FY 2013 (8 months)	
	Trips	Percent	Trips	Percent
Transit Team	636,006	37.2%	454,929	37.5%
First Transit (demand)	460,214	26.9%	333,941	27.5%
First Transit (agency)	354,753	20.7%	239,280	19.7%
DARTS (Dakota County)	149,026	8.7%	109,228	9.0%
H.S.I./First Transit (Washington County)	21,720	1.3%	11,711	1.0%
Anoka County	67,533	3.9%	25,655	2.1%
Scott County	22,349	1.3%	17,097	1.4%
Taxi Services, Inc.	0	0%	21,052	1.7%
Total	1,711,601	100%	1,212,893	100%

Table 3.2 summarizes how Met Council allocates its vehicles (small buses, vans, and sedans) to each service provider.

Table 3.2 – Metro Mobility Vehicle Fleet

Service Provider	Vehicles
Transit Team	149
First Transit (demand)	120
First Transit (agency)	80
DARTS	35
Anoka County	10
Scott County	4
Total	398

Met Council clearly distinguishes between ADA and non-ADA trips. Trips that begin and end within the complementary paratransit service area are ADA trips. Conversely, trips that began or end beyond the ADA service area are non-ADA trips.

Met Council records the limited number of same-day trips it provides (primarily using Taxi Services, Inc.) as non-ADA trips.

Met Council also provides subscription (“standing order”) service in addition to First Transit agency trips for any trips (one-way or round trip) that occur at least weekly between the same origins and destinations.

4 Scope and Methodology

The purpose of this review is to provide FTA with a tool for determining whether a public operator of a fixed route system is in compliance with the complementary paratransit requirements under DOT ADA regulations. However, the deficiencies identified and findings made in this report are by necessity limited to the information available to and the observations made by the review team at the time of the site visit. A lack of findings in a particular review area does not constitute endorsement or approval of an entity's specific policies, procedures or operations; instead, it simply indicates that no deficiencies in the delivery of service were observed at the time of the site visit.

The scope of the review and the methodology employed by the review team is described in greater detail below.

4.1 Scope

The review focused on whether Met Council's complementary paratransit service (Metro Mobility) operates according to the service criteria specified in 49 CFR § 37.131 of the DOT ADA regulations, and without capacity constraints prohibited under 49 CFR § 37.131(f)). The review examined Metro Mobility's service area, response time, fares, and hours and days of service, as well as its policies, standards and procedures for monitoring service provision, including on-time performance, on-board travel time, telephone hold times, and avoiding trip denials and missed trips. The review seeks to ascertain whether service is being provided to eligible individuals within at least the minimum required service area on a next-day basis, during the same hours and days as the fixed route system, for not more than twice the fixed route fare for the same trip; whether there are patterns or practices that result in a substantial number of trip limits, trip denials, untimely pickups, and/or trips of excessive length; policies which cause riders to arrive late to appointments; or long telephone hold times, as defined by the transit agency's established standards (or typical practices if standards do not exist).

Overall, the complementary paratransit compliance review included the following regulatory requirements:

- Complaint resolution and compliance information (49 CFR §§ 27.13(b) and 27.121(b))
- Nondiscrimination (49 CFR § 37.5)
- Service under contract (49 CFR § 37.23)
- Requirement for comparable complementary paratransit service (49 CFR § 37.121)
- ADA paratransit eligibility: Standards (49 CFR § 37.123)
- ADA paratransit eligibility: Process (49 CFR § 37.125 including whether:
 - Information is made available in accessible formats upon request
 - A decision is made within 21 days or presumptive eligibility is granted pending a decision
 - There is written notification of all decisions
 - All denials or conditional eligibility determinations are completed in writing with specific reasons for the decision
 - There is an administrative appeals process for denials and conditional eligibility determinations
- Reasonable policies for suspending service to eligible riders who establish a pattern or practice of missing trips
- Complementary paratransit service for visitors (49 CFR § 37.127)
- Types of service (49 CFR § 37.129)

- Service criteria for complementary paratransit (49 CFR § 37.131) including:
 - Service area
 - Response time
 - Fares
 - Trip purpose restrictions
 - Hours and days of service
 - Capacity constraints
- Subscription service (49 CFR § 37.133)
- Training requirements (49 CFR § 37.173)

4.2 Methodology

FTA's Office of Civil Rights sent a notification letter to Met Council's Chairwoman Susan Haigh on August 8, 2013, confirming the dates for the site visit and asking Met Council to send information to the review team in advance of the site visit (Attachment A).

Prior to the site visit, the review team examined the following service information:

- Met Council's description of how it structures its complementary paratransit service
- Public information describing Met Council's complementary paratransit service
- Met Council's standards or goals for on-time performance, trip denials, missed trips, complementary paratransit trip length, and telephone hold times, and how it specifies all of these standards or goals in its contracts with service providers and in its "Metro Mobility Service Guide"

As FTA requested, Met Council made additional information available during the visit:

- Copies of completed driver manifests for recent months
- Thirty-six months of service data, including the number of trips requested
- Records of consumer comments and complaints related to capacity issues, including trip denials, on-time performance, travel time, and telephone access
- Procedures for passenger complaints and other incident reports
- Met Council's summary of complaints
- A fleet roster of Metro Mobility vehicles
- A listing of complementary paratransit employees and their start dates
- Capital and operating budgets and cost data

The Met Council complementary paratransit service site visit took place from September 30–October 4, 2013. The site visit began with an opening conference, held at 9 a.m. on September 30, 2013, at the Met Council office at 390 North Robert Street, St. Paul, MN. Attending the conference were:

- Kathleen Shea – Director, Program Evaluation and Audit, Metropolitan Council
- Gerri Sutton – Assistant Director, Contracted Transit Services, Metropolitan Council
- Andrew Krueger – Senior Manager, Metro Mobility
- Mary Gustafson – Grants Manager, Metro Transit
- Marjorie Espina – Region V Civil Rights Officer, FTA (via telephone)
- David Chia – Review Team Leader, the Collaborative

- Jim Purdy – Review Team Member, the Collaborative
- Russell Thatcher – Review Team Member, TranSystems

Following the opening conference, the review team met with representatives from Met Council and Metro Mobility to discuss the information sent in advance, as well as the on-site information and material. For the remainder of the day, the review team discussed the eligibility process with Metro Mobility's customer service manager. Using data from a sample week of Metro Mobility service (September 8–14, 2013), the review team began its analysis of on-time performance, trip lengths, and telephone performance. The review team also discussed the Metro Mobility complaint process and budgeting process with Met Council staff,

On Tuesday, October 1, 2013, the review team visited the First Transit Metro Mobility facility in Roseville, MN. The review team interviewed First Transit's project manager and toured the facility, including the Metro Mobility garage. The review team met with First Transit's lead scheduler for its demand service and observed the dispatching process for both First Transit operations. The review team examined a sample of completed driver manifests to verify data in the monthly performance reports and interviewed six First Transit drivers.

The review team also examined First Transit's policies and procedures for handling trip reservations and listened to incoming calls, observing how reservationists negotiated trip requests with callers and entered the information in the paratransit software. This examination sought to identify any calls that resulted in denials or unsuccessful negotiations, evidence of trip caps or waiting lists, or any patterns or practices of denying a significant number of trip requests.

The review team also gathered the following information:

- Vehicle fleet composition
- Vehicle pullout and driver availability
- Other staffing schedules and staffing turnover
- Driver training materials

On Wednesday, October 2, 2013, the review team visited the Transit Team Metro Mobility facility in Minneapolis. The review team interviewed the Transit Team's project manager and toured the facility. They met with the Transit Team's lead scheduler, observed the dispatching process, and examined a sample of completed driver manifests to verify data in the monthly performance reports. The review team also interviewed six Transit Team drivers.

The review team also examined Transit Team's policies and procedures for handling trip reservations, and listened to incoming calls, observing how reservationists negotiated trip requests with callers and entered the information in the paratransit software. This examination sought to identify any calls that resulted in denials or unsuccessful negotiations, evidence of trip caps or waiting lists, or any patterns or practices of denying a significant number of trip requests.

The review team also gathered the following information:

- Vehicle fleet composition
- Vehicle pullout and driver availability
- Other staffing schedules and staffing turnover
- Driver training materials

On Thursday, October 3, 2013, the review team analyzed data at Met Council's office, examining on-time performance, on-board travel times, and eligibility determination records. The review team compared on-board complementary paratransit travel time with those via fixed route service for comparable trips,

focusing on complementary paratransit trips with lengthy travel times. The review team gathered additional information concerning Met Council's monitoring policies and practices.

On Friday, October 4, 2013, the review team continued to analyze and tabulate the various data they had gathered. They posed additional questions to representatives from Met Council and Metro Mobility and prepared for the exit conference, which took place at 2 p.m. at Met Council's office. Attending the conference were:

- Kathleen Shea – Director, Program Evaluation and Audit, Metropolitan Council
- Gerri Sutton – Assistant Director, Contracted Transit Services, Metropolitan Council
- Andrew Krueger – Senior Manager, Metro Mobility
- Wanda Kirkpatrick – Director, Office of Diversity and Equality Opportunity, Metropolitan Council
- Andy Streasick – Manager, Customer Service, Metro Mobility
- David Chia – Review Team Leader, the Collaborative
- Jim Purdy – Review Team Member, the Collaborative
- Russell Thatcher – Review Team Member, TranSystems
- Bill Schwartz – Project Manager, the Collaborative (via telephone)

FTA provided Met Council with a draft copy of the report for review and response. A copy of Met Council's response to the draft report, dated March 4, 2014, is included as Attachment B.

5 Findings and Advisory Comments

This chapter details the findings for each of the areas pertinent to the regulations found in 49 CFR Parts 27, 37 and 38 outlined in the Scope and Methodology section above. For each area, an overview of the relevant regulations and a discussion of the regulations as they apply to Met Council's complementary paratransit system is provided below, with corrective actions and a timetable to correct deficiencies for each of the requirements and sub-requirements where necessary.

Findings are expressed in terms of "deficiency" or "no deficiency." Findings of deficiency denote policies or practices found to be not in compliance with DOT ADA regulations or matters for which FTA requires additional reporting to determine whether an ADA compliance issue exists.

Findings of deficiency shall always require corrective action and/or additional reporting, and will always be expressed as:

- A statement concerning the policy or practice in question at the time of the review
- A statement concerning the DOT ADA requirements being violated or potentially being violated
- A statement concerning the required corrective action to resolve the issue

Advisory comments are statements detailing recommended or suggested changes to policies or practices to ensure effective practices under the ADA or otherwise assist the entity in achieving or maintaining compliance.

5.1 Comparable Complementary Paratransit Service

Requirement: Under 49 CFR § 37.121, transit agencies operating a fixed route system must provide complementary paratransit service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed route system.

Discussion: During this compliance review, no deficiencies were found with the requirement for Met Council to provide comparable paratransit service with the Metro Mobility service.

5.2 ADA Paratransit Eligibility Process

Absence of Administrative Burdens

Requirement: Under 49 § CFR 37.125, transit agencies must establish an eligibility process for complementary paratransit. The process may not impose unreasonable administrative burdens on applicants, and, since it is part of the entity's nondiscrimination obligations under § 37.5(d), may not involve "user fees" or application fees to the applicant.

Discussion: During this compliance review, no deficiencies were found with respect to the prohibition against unreasonable administrative burdens in Met Council's eligibility process.

Applicants must complete a two-part application form (see Attachment C), which is available online and via telephone by calling the Metro Mobility Service Center (Service Center). The first part of the application (Certification Questionnaire) requests general information as well as information about mobility aids, personal attendants, functional abilities, and current use of fixed route transit. The second part (Professional Verification) requires a professional familiar with the applicant to describe the type of disability, whether permanent or temporary, current treatment, impacts of extreme environmental conditions, and functional abilities. Met Council accepts verifications from a wide array of professionals.

Depending on an applicant's disability, Met Council requires some individuals to attend an interview or an in-person assessment to enable Metro Mobility staff to measure their physical or cognitive functional abilities.

According to Page 17 of the Metro Mobility Service Guide (Service Guide – see Attachment D), when scheduling in-person assessments, Met Council provides free transportation. Customer service representatives also ask applicants if they need transportation to and or from these assessments.

All riders who use Metro Mobility must have photo ID cards, which Met Council issues free of charge; replacement ID cards are \$5. During in-person assessments, Met Council photographs applicants and sends photo ID cards with eligibility letters. (See Attachment E.)

Applicants deemed eligible without needing an interview receive letters with temporary IDs (Attachment E). Then they obtain photo IDs by:

- Traveling to the Service Center in downtown St. Paul; as with in-person assessments, Met Council provides free transportation for this purpose
- Contacting Minnesota Driver and Vehicle Services (DVS) to request duplicate drivers' licenses or State ID cards; Met Council works with DVS to have the letter "A" included on the licenses or State IDs, indicating the individuals are ADA paratransit eligible

5.3 Paratransit Eligibility Standards

Requirements: Under 49 CFR § 37.123(e)(1)–(3), a transit agency's eligibility processes, application materials and public information must be comprehensive enough to permit the transit agency to determine that the following individuals are ADA paratransit eligible:

Any individual with a disability who is unable, as the result of a physical or mental impairment (including a vision impairment), and without the assistance of another individual (except the operator of a wheelchair lift or other boarding assistance device), to board, ride, or disembark from any vehicle on the system which is readily accessible to and usable by individuals with disabilities

Any individual with a disability who needs the assistance of a wheelchair lift or other boarding assistance device and is able, with such assistance, to board, ride and disembark from any vehicle which is readily accessible to and usable by individuals with disabilities

Any individual with a disability who has a specific impairment-related condition that prevents the individual from traveling to a boarding location or from a disembarking location

Discussion: During this compliance review, no deficiencies were found with the comprehensiveness of Met Council's eligibility processes, application materials, and public information communicating the eligibility process. An advisory comment is made regarding in-person assessments for applicants whose functional abilities are in question.

Pages 14–17 of the Service Guide describe ADA paratransit eligibility as well as the application process in a section titled, "Met Council Answers Your Questions about Metro Mobility." Met Council publishes the Service Guide on its website and makes it available in hard copy and in accessible formats upon request. Page 14 of the Service Guide outlines the three categories of eligibility in § 37.123(e)(1)–(3). Representatives can also explain the ADA paratransit eligibility process via telephone.

A Metro Mobility Customer Service Specialist (CSS) screens application forms for errors or omissions. If the CSS finds any, he or she calls the applicant to complete the form. The CSS returns forms to applicants when professional verification is missing.

The CSS confers eligibility to applicants whom they judge to clearly have disabilities that would prevent them from using fixed route service. The CSS forwards all other applications to the ADA Paratransit Evaluator (Evaluator), a Met Council staff member who has nine years of experience and training as an occupational therapist, vocational assessment and job coach, and speech therapist, and is a certified brain injury specialist. The Evaluator is also trained to administer the Tinetti test (used to assess an individual's ability to balance while standing and while moving) and the Functional Assessment of Cognitive Transit Skills (FACTS) test (used to assess an individual with cognitive disabilities regarding their ability to use fixed route service), and has participated in ADA paratransit eligibility training.

The Evaluator contacts some applicants and/or the professional who completed the verification forms to obtain additional information and/or schedule an in-person appointment. These appointments include an interview followed by any necessary functional assessments such as the Tinetti Balance and Gait test, the FACTS test, or a short outdoor walk along a designated route.

The Evaluator then determines the applicant's eligibility (i.e., unconditionally or conditionally eligible or not eligible). Determinations cover Met Council's entire term of eligibility of 1.5–5 years (see below) or include a termination date (temporary eligibility). Only the Evaluator can determine whether or not applicants are conditionally eligible.

At the time of the site visit, Metro Mobility's Customer Service Manager (CSM) estimated that 35,000 individuals were listed as ADA paratransit eligible, of which 25,000 were active riders (i.e., those who used the service at least once in the past year).

The review team examined Met Council's eligibility determination records for September 1, 2012–August 31, 2013. Table 5.1 summarizes this key process and outcome information. As shown, Met Council received 8,888 applications during the 12-month period and made determinations for 8,561 applications. Of the remainder, 276 applications (3.1 percent) were determined incomplete and 51 applications (0.6 percent) were in process at the time of the site visit.

For the 8,561 completed eligibility determinations, Met Council found 6,601 applicants unconditionally eligible (77.1 percent), 1,151 conditionally eligible (13.4 percent), 571 eligible on a short-term (temporary) basis (6.7 percent), and 238 not eligible (2.8 percent).

**Table 5.1 – Metro Mobility Eligibility Process Statistics and Outcomes
September 1, 2012–August 31, 2013**

	Number	Percent
Incomplete applications	276	3.1%
Applications still in process	51	0.6%
Eligibility determinations made	8,561	96.3%
Total applications received	8,888	100%
Unconditional determinations	6,601	77.1%
Conditional determinations	1,151	13.4%
Temporary determinations	571	6.7%
Not eligible determinations	238	2.8%
Total eligibility determinations	8,561	100%

The review team examined a sample of 31 eligibility determination files to assess Met Council's processing of unconditional (11 files) and conditional eligibility (10 files) or not eligible (10 files).

Based on an examination of the 11 sample files for unconditionally eligible applicants, the review team agreed with the determination that these applicants could not use fixed route transit service under any conditions.

Based on an examination of the 10 sample files for conditionally eligible applicants, the review team agreed with the determination that these applicants were either already using fixed route service for some of their trips or could expect to use fixed route services under some conditions.

Based on an examination of the 10 sample files for ineligible applicants, the review team agreed the applicants' disabilities did not prevent them from using fixed route transit services. In one case, information from the verifying professional was not very detailed. The applicant was a homeless woman, and the professional had limited contact with the applicant and was unsure of her functional abilities. In this instance, Met Council made its determination without conducting an interview or in-person assessment. (See the advisory comment below.)

Advisory Comment: An effective practice for transit agencies that conduct in-person assessments is to invite all applicants whose functional abilities are in question to attend in-person assessments.

Accessible Information

Requirement: Under 49 CFR § 37.125(b), transit agencies must make all information about the process, materials necessary to apply for eligibility, and notices and determinations concerning eligibility available in accessible formats, either as a rule or upon request.

Discussion: During this compliance review, no deficiencies were found with the requirement to provide accessible eligibility information, or with how Met Council communicates the availability of materials in accessible formats to potential applicants.

The Service Guide includes the following statement on the Contents page:

This document contains important information about public transportation for people with disabilities. It is available in alternative formats upon request, and is posted at our accessible website. Contact us online at www.metromobility.org or at the Service Center: 390 North Robert Street, St. Paul, MN 55101. Telephone 651-602-1111; 651-221-9886 TTY; Fax 651-602-1660.

The ADA Paratransit Eligibility Application/Recertification form (Attachment E), which is also posted on the Met Council website, states:

If you need this form in an accessible format please call a customer service representative at (651) 602-1111, (651) 221-9886 TTY.

The first page of the application form also states:

This application and future written information are available in large print. Does large print better suit your needs?

According to Metro Mobility's CSM, Met Council maintains a supply of application forms in large print. Met Council also maintains five Braille copies of applications and has a relationship with State Services for the Blind to prepare additional copies. Met Council also makes the application and other information available via CD upon request.

Eligibility Determinations or Presumptive Eligibility Within 21 Days

Requirement: Under 49 CFR § 37.125(c), a transit agency that has not made a written eligibility determination by the 21st day following submission of a complete application must treat the applicant as eligible on the 22nd day and provide service until and unless the transit agency denies the application. The transit agency's process must communicate to applicants the right to this presumptive eligibility so they are aware of their rights to schedule and use the service beginning on the 22nd day.

Discussion: During this compliance review, deficiencies were found with how Met Council communicates presumptive eligibility to applicants.

No deficiencies were found with the requirement to have a process in place for applicants whose eligibility has not yet been determined to provide them service beginning on the 22nd day following the submission of a complete application. An advisory comment is made regarding tracking dates during the application process.

Met Council stated that they process all applications for ADA paratransit eligibility within 21 days. The review team confirmed this practice through its review of Met Council's procedures for tracking applications as well as through an analysis of processing time. Although Met Council's application processing practices effectively provide service to ADA paratransit eligible applicants within 21 days, Met Council does not inform applicants of their right to service starting on the 22nd day. Section A of the professional verification portion of the application form states, "Once all required information is received, you will be notified within 21 days regarding your eligibility status or if you need to participate in an in-person assessment." In addition, the application instructions page states, "Please note that applicants who need to come in for in-person assessments will still have their applications processed within 21 calendar days."

Met Council maintains a database to track applications for ADA paratransit eligibility and enters the dates they receive applications and the dates they certify riders as eligible. Using this database, the review team analyzed the processing time for recent applications for 679 determinations made between September 16, 2013 and October 16, 2013, as shown in Table 5.2. Met Council made approximately 28 percent of the determinations the same day they received completed application forms and made approximately 87 percent of its determinations within seven days of receipt. Met Council made approximately 99 percent of its determinations within 14 days and all determinations within 21 days.

According to the CSM, when Met Council requests applicants to attend in-person interviews and/or functional assessments, they do not make any adjustments to the database—such as the dates they contact applicants to schedule interviews/assessments or the dates of the appointments. They start the "21-day clock" the day they receive completed paper applications.

Corrective Action Schedule: Within 60 days of the issuance of the final report, Met Council must revise its Metro Mobility application form and instructions to explain applicants' right to service on the 22nd day if they have not received an eligibility determination within 21 days.

Advisory Comment: An effective practice is to record dates of interviews and assessments, including dates of calls to schedule and confirm appointments. These records help a transit agency determine whether its process meets the § 37.125(c) requirements including not imposing unreasonable administrative burdens upon applicants. Another effective practice is to record any events outside the transit agency's control that delay the applicant submitting a completed application, such as applicants' canceling or not appearing for scheduled interviews/assessments.

Table 5.2 – Processing Time for 679 Eligibility Determinations Made September 16–October 16, 2013

Days	Applications	Percent	Cumulative Percent
0 (same day)	191	28.13%	28.13%
1	198	29.16%	86.75%
2	43	6.33%	
3	60	8.84%	
4	29	4.27%	
5	31	4.57%	
6	13	1.91%	
7	24	3.53%	98.82%
8	28	4.12%	
9	28	4.12%	
10	0	0.00%	
11	10	1.47%	
12	4	0.59%	
13	3	0.44%	
14	9	1.33%	100.00%
15	3	0.44%	
16	1	0.15%	
17	1	0.15%	
18	0	0.00%	
19	1	0.15%	
20	0	0.00%	
21	2	0.29%	
Total	679	100%	

Written Eligibility Determinations Including Specific Reasons for Denials or Temporary or Conditional Eligibility Determinations

Requirements: Under 49 CFR § 37.125(d), determinations of eligibility must be made in writing. The documentation must include the name of the eligible individual, the name of the transit provider, the telephone number of the entity's paratransit coordinator, an expiration date for eligibility, and any conditions or limitations on the individual's eligibility including the use of a personal care attendant (PCA). Under § 37.125(e), if applicants are found to be ineligible, the determination must state the specific reasons for the decision (a mere statement that the applicant has been found to be ineligible is not sufficient). If an individual has been determined to be conditionally or temporarily eligible, the determination must state the conditions under which eligibility is granted and the basis for that determination. Information concerning the applicant's right to appeal under § 37.125(g) must also be provided.

Discussion: During this compliance review, deficiencies were found with the requirement to inform individuals determined to be conditionally or temporarily eligible of their right to appeal the decision.

Deficiencies were also found with the lack of information in the written determination concerning the use of a PCA.

No deficiencies were found with the requirements to make eligibility determinations in writing, to provide the required documentation to eligible individuals, to provide specific reasons for eligibility denials, or to

inform individuals who are denied eligibility about their right to appeal. An advisory comment is made regarding how Met Council explains conditional eligibility.

Met Council's ADA paratransit eligibility determination letters (Attachment E) note the specific type of eligibility under "Eligibility Status," explaining the three types of eligibility, describing:

- Unconditional eligibility as "You can use ADA public transit service for all your trips"
- Conditional eligibility as "Under certain conditions you may be able to use other modes of public transit"
- Temporary eligibility as "You are eligible for a limited period of time"

Met Council uses two templates for letters communicating eligibility denials. (See Attachment F.) One letter is tailored to applicants that participated in in-person assessments; the second letter is for those who do not receive such assessments. Both letters provide opportunities for the author to insert text outlining specific reasons for the decision. The templates also include a list of common reasons for denials of eligibility, which the author can include as appropriate. The denial letters also include information on the right to an appeal and how to appeal the decision.

However, Met Council's conditional and temporary eligibility letters do not include information on the right to an appeal and how to appeal the decision.

Met Council's ADA paratransit eligibility determination letters meet some, but not all of the § 137.125(d) documentation requirements as follows:

- Letters are on Met Council's letterhead. Metro Mobility is also named on the detachable portion of the letters that serve as temporary ID cards
- The eligible individuals' names are on top of the letters as well as on the detachable portion of the letters
- The letters and temporary ID cards provide the Service Center telephone number
- The first line of the letters lists the eligibility expiration date
- The detachable temporary ID cards state limitations on eligibility (conditional or temporary only)

The letters do not state whether Met Council authorizes an eligible rider to travel with a personal care attendant (PCA). According to Metro Mobility's CSM, Met Council permits all eligible riders to travel with PCAs. During trip request calls, reservationists ask riders if they will be traveling with a PCA and then add this information to the reservation.

As discussed above, the review team examined 10 ineligible applicants' files, which included personalized, detailed, and appropriate explanations of the reasons for Met Council's determinations.

For individuals determined conditionally eligible, the letters do not explain the conditions under which the rider can use complementary paratransit. Metro Mobility's CSM explained that those determined conditionally eligible can decide which trips they would like to make on Metro Mobility.

Corrective Action and Schedule: Within 60 days of the issuance of the final report, Met Council must revise the letters it sends to conditionally or temporarily eligible applicants to include information about their right to appeal the decision and the appeal process.

Met Council must revise the letters it sends to conditionally or temporarily eligible applicants to include information about the use of a PCA.

Advisory Comment: Met Council's letters conferring conditional eligibility do not indicate the specific conditions under which applicants can be expected to use fixed route services. An effective practice is for transit agencies to explain the conditions under which riders are eligible for complementary paratransit service with statements such as, "when the distance to or from stops and stations is more than four blocks

or when the route to stops and stations is inaccessible.” Transit agencies making such distinctions can use this information to implement trip-by-trip eligibility.

Recertification of Eligibility at Reasonable Intervals

Requirement: Under 49 CFR § 37.125(f), transit agencies are permitted to require paratransit riders to recertify eligibility at reasonable intervals. As stated in Appendix D, a reasonable interval would be between one and three years.

Discussion: During this compliance review, no deficiencies were found with the recertification process or with how Met Council communicates recertification of eligibility to applicants.

According to Metro Mobility managers, new Metro Mobility riders are eligible for 1.5–5 years. In an effort to help riders remember their eligibility expiration dates, Met Council ties the date to either their birthday or state ID/driver’s license expiration. Once recertified, eligibility terms are four years long. Met Council ties the length of riders’ temporary eligibility to the expected duration of their disability.

Met Council tracks eligibility expiration dates and notifies riders four months in advance of the need to reapply.

Met Council provides a three-month transition period to existing riders who apply for recertification but are later determined ineligible, which provides them an opportunity to appeal the decision before their current eligibility expires. This transition period also provides them time to arrange alternate travel if they do not appeal the decision or remain ineligible after a panel hears their appeal (see below).

Met Council grants certain riders unconditional permanent eligibility. According to its policy—effective July 1, 2009—this includes unconditionally eligible riders who are “in a situation where future advancements in technology or newly developed skills are unlikely to alter eligibility status because of either advanced age (65+) or reduced life expectancy as a symptom of a health condition or disability.” (See Attachment G.)

Administrative Appeal Process for Denials or Decisions Granting Conditional or Temporary Eligibility

Requirements: Under 49 CFR § 37.125(g), transit agencies must have a process for administering appeals through which individuals who are denied eligibility can obtain review of the denial. Transit agencies are permitted to require written notice, within 60 days of its written decision denying or limiting eligibility that the applicant wishes to exercise his or her right to an appeal hearing. Transit agencies cannot require the “filing of a written appeal.”

The appeal process must include an opportunity for the applicant to be heard and to present information and arguments, with appropriate separation of function (i.e., a decision by a person not involved with the initial decision to deny eligibility). Appeal decisions must be provided in writing and explain the reasons for denying the appeal. The appeal hearing must be scheduled within a reasonable amount of time, and if a decision has not been made within 30 days of the completion of the appeal process, the appellant must be provided complementary paratransit service from that time until and unless a decision to deny the appeal is issued, as required.

Discussion: During this compliance review, deficiencies were found with Met Council’s process for administering appeals of eligibility determinations.

Deficiencies were also found with the requirement for the appeal process to include appropriate separation of functions (i.e., a person not involved with the initial denial making an appeal decision).

Deficiencies were also found with how Met Council explains its reasons for denying an appeal.

Met Council’s Office of Diversity and Equal Opportunity (ODEO) oversees the appeal process. When applicants appeal eligibility determinations, ODEO contacts them to schedule a hearing; ODEO confirms

the hearing dates and times in writing and encloses its written procedures for hearing appeals and making decisions. (See Attachment H.) The procedures require ODEO's Appeal Panel to decide appeals within 21 days of the hearings and to communicate their decisions within 30 days or "the appeal shall be considered granted and the Appellant shall be certified for Metro Mobility service by the Metro Mobility General Manager." (See Attachment H.)

A three-person panel hears the appeals. The chairperson of Met Council's consumer advisory committee—the Transportation Accessibility Advisory Committee (TAAC)—serves as chair of the Appeal Panel. The other two representatives include a professional who works with persons with disabilities, and a volunteer professional acquainted with the appellant's stated disability that the TAAC recommends.

At the time of the site visit, available volunteer professionals included a rehabilitation worker from the Courage Center, a representative from a local rehabilitation agency, a travel instructor from the St. Paul School, which serves individuals with intellectual disabilities, and a representative of ADA Minnesota, which is a regional ADA technical assistance agency.

Met Council's letter denying eligibility (Attachment F) requires appellants to send a written statement with reasons they feel they are eligible for Metro Mobility service, stating:

If you wish to appeal this decision, you may do so by sending a written statement in which you discuss the reasons why you feel you are eligible for ADA paratransit services, such as Metro Mobility.

Your statement should include additional information about any limitations you have that make it impossible for you to use regular-route bus service.

While transit agencies may require individuals to request appeals in writing, they may not require appellants to put in writing the reasons for the appeals.

As discussed above, Met Council makes some eligibility determinations without first conducting an in-person assessment. When applicants who receive letters notifying them of the denial write to Met Council requesting an appeal, Met Council telephones to offer them two options: (1) participate in an in-person assessment before proceeding to the hearing stage; or (2) arrange for a hearing directly. Met Council schedules hearings for appellants who choose to skip an in-person assessment (see above). When an appellant chooses the first option, Met Council schedules an in-person assessment, which the Evaluator performs. The Evaluator discusses his or her findings with the appellant at the end of the assessment (i.e., whether the assessment confirms his or her previous eligibility determination or supports its reversal). Met Council also communicates this information in a follow-up letter, which invites the appellant to request a hearing.

Metro Mobility's CSM explained that these in-person assessments are useful and can minimize the number of appeal hearings. While this practice is acceptable, the regulations require "an appropriate separation of functions" during the appeal process, which means someone other than the individual who initially denied the applicant's eligibility must perform the in-person assessment. At present, the Evaluator determines eligibility and performs in-person assessments.

Met Council does not keep records of how many such in-person assessments occur on appeal.

Met Council communicates Appeal Panel decisions in writing. (See Attachment I for two letter templates and a form.) Met Council uses the first letter to deny the appeal and uses the second letter to reverse the initial determination. The form Met Council attaches to the letter communicates the relevant facts of the appeal and decision, but without detailed reasons. Appeal decisions must give reasons for denying appeals.

Corrective Action Schedule: Within 60 days of issuing the final report, Met Council must no longer require appellants to submit written statements describing reasons for their appeals.

If Met Council continues to offer in-person assessments on appeal, it must ensure separation of functions between individuals making initial eligibility decisions and individuals conducting assessments on appeal.

Met Council must revise its appeal decision letters and forms to include specific reasons for denying appeals.

Complementary Paratransit for Visitors

Requirements: Under 49 CFR § 37.127(d)–(e), complementary paratransit service must be made available to visitors not residing in the jurisdiction(s) served by a transit agency for any combination of 21 days during any 365-day period, beginning with the visitor’s first use of the service during the 365-day period. Transit agencies must treat as eligible all visitors who present information that they are eligible for complementary paratransit service in the jurisdiction in which they reside; for those who do not present such documentation, transit agencies may require documentation of the individual’s place of residence and, if the individual’s disability is not apparent, of his or her disability. In no case may transit agencies require visitors to apply for or receive eligibility certification for their own complementary paratransit service before providing service to eligible visitors.

Discussion: During this compliance review, deficiencies were found with the requirement to make complementary paratransit service available to individuals meeting the definition of visitor, including limiting documentation requirements to those whose disabilities are not apparent.

Deficiencies were also found with Met Council documentation requirements for ADA paratransit eligible visitors.

The review team examined the certification database and identified 24 visitors that Met Council granted eligible for Metro Mobility service.

When visitors request Metro Mobility service, Met Council asks for names and dates of birth and enters these details into its database. Met Council also asks those certified as ADA paratransit eligible by other transit agencies to forward copies of their certifications. For visitors without such certifications, Met Council asks for other disability documents, even from visitors who have an apparent disability. According to Metro Mobility’s CSM, Met Council is very lenient on the source of those documents, and easily accepts statements from third parties or the people describing their own disabilities.

Met Council also asks visitors how long they will stay and sets their dates of eligibility accordingly. When the same visitor returns, Met Council requires them to contact the Service Center to update the dates of eligibility. When visitors arrive more than once in a 365-day period, Met Council does not track the number of eligible days. If they stay more than 21 days, Met Council asks that they apply for eligibility as a local applicant.

Page 15 of the Service Guide states,

If you are visiting the Twin Cities metropolitan area you must register with the Metro Mobility Service Center prior to your arrival in the Twin Cities. Metro Mobility will request a letter from the transit agency in your home state, which verifies your eligibility under the Americans with Disabilities Act (ADA).

The regulations require transit agencies to accept verification information visitors provide. Requesting verification from the transit agency that granted eligibility is not consistent with the requirements.

Corrective Action Schedule: Within 60 days of the issuance of the final report, Met Council must revise its policy and procedures regarding visitors to accept requests for visitor eligibility from who indicate an apparent disability when making such requests, regardless of whether they are certified as ADA paratransit eligible.

Met Council must revise its documentation requirements for ADA paratransit eligible visitors to accept documentation directly from visitors as opposed to requesting documentation from a visitor's home transit agency.

5.4 Types of Service

Requirement: Under 49 CFR § 37.129(a), transit agencies must provide complementary paratransit service on an origin-to-destination-basis. Transit agencies may determine, through their local planning process, whether to establish either door-to-door or curb-to-curb service as the basic mode of complementary paratransit service. Where the local planning process establishes curb-to-curb service as the basic complementary paratransit service mode, however, provision must still be made to ensure that the service available to each passenger actually gets the passenger from his or her point of origin to his or her destination point. To meet this origin-to-destination requirement, service may need to be provided to some individuals, or at some locations, in a way that goes beyond curb-to-curb service.

Discussion: During this compliance review, no deficiencies were found with the requirement to provide origin-to-destination service to ADA paratransit eligible riders or with how Met Council communicates its origin-to-destination service policies.

According to Page 1 of the Service Guide, Met Council's origin-to-destination service policy is "first-door-through-first-door service." "Drivers escort every passenger from the first-entry door at their pickup through the first-entry door at their destination."

Met Council's contracts with its service providers include liquidated damages for drivers not providing the required level of service. The review team interviewed First Transit and Transit Team managers and drivers who said they understood the requirements for first-door-through-first-door service. The review team also interviewed Metro Mobility riders who confirmed drivers provided this level of service.

5.5 Service Criteria for Complementary Paratransit

Requirement: As codified in 42 U.S.C. 12143, the ADA directed the Secretary of Transportation to issue regulations that establish minimum service criteria for determining the level of service provided by paratransit as a complement to fixed route service. These criteria are contained in 49 CFR § 37.131 and include service area, response time, fares, and hours and days of service, and prohibit restrictions on trip purpose and capacity constraints that limit the availability of service to eligible individuals. The review team assessed Met Council's complementary paratransit system using these criteria as described in this section.

Service Area

Requirement: Under 49 CFR § 37.131(a)(1), all public entities operating a fixed route transit system must provide complementary paratransit service that covers, at a minimum, all areas within a 3/4-mile radius of all of its bus routes, and within a "core service area" that includes any small areas that may be more than 3/4 mile from a bus route, but are otherwise surrounded by served corridors. This includes any areas that cross political boundaries or taxing jurisdictions, but are within a 3/4-mile radius of a fixed route, unless the transit agency does not have the legal authority to operate in those areas. For transit agencies operating a light rail or rapid rail transit service, the complementary paratransit service area must also include a 3/4-mile radius around each station, with service provided from points within the service area of one station to points within the service area of another.

Discussion: During this compliance review, no deficiencies were found with the requirement to provide complementary paratransit service to eligible individuals to and from origins and destinations within the service area or with how Met Council communicates the service area.

In fulfillment of local requirements, the Metro Mobility service area is larger than what the DOT ADA regulations require. Page 4 of the Service Guide states, “Metro Mobility provides service in areas served by all day local fixed route transit service and the area designated by the state legislature known as the ‘Transit Taxing District.’” This includes areas Metro Transit bus and light rail serve.

Metro Mobility also provides complementary paratransit service to meet the obligations of the following five suburban transit systems that have “opted out” of Metro Transit service but are within the Met Council region:

- Maple Grove Transit
- Minnesota Valley Transit Authority
- Plymouth Metrolink
- Shakopee Transit
- SouthWest Transit

Minnesota Valley Transit, Shakopee Transit, and SouthWest Transit operate local bus routes. Maple Grove Transit and Plymouth Metrolink provide commuter service only. All five transit agencies only operate weekday service.

Met Council’s [website](#) includes three maps depicting ADA and non-ADA service areas—one each for weekday, Saturday, and Sunday service. Riders can enter origin and destination addresses and days of travel to determine if Metro Mobility provides the desired trip. In addition, the Met Council website lists the municipalities that offer Metro Mobility service, with start and end times for weekday, Saturday, and Sunday service.

When riders request trips by phone, reservationists use the paratransit software’s geographic database to determine whether or not the origin and destination addresses are within the Metro Mobility service area.

Response Time

Requirements: Under 49 CFR § 37.131(b), transit agencies must schedule and provide complementary 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, including during times comparable to normal business hours on a day when the offices are not open before a service day. Reservations may be taken by reservation agents or by mechanical means. Under 49 CFR § 37.131(b)(2), while transit agencies may negotiate the pickup time with a caller prior to a trip being scheduled, they cannot require a rider to schedule trips to begin more than one hour before or after the rider’s desired departure time. Any greater deviation would exceed the bounds of comparability. Transit agencies must have policies and procedures in place to ensure that schedulers and dispatchers do not adjust a rider’s negotiated pickup time or pickup window without the rider’s consent.

Under 49 CFR § 37.131(b)(4), if transit agencies propose to change their reservations system, they must comply with the public participation requirements equivalent to those of § 37.137 (b)–(c). Transit agencies may permit reservations to be made up to 14 days in advance of an eligible individual’s desired trips, subject to the same trip negotiation requirements as next-day trips required under § 37.131(b)(2).

Discussion: During this compliance review, deficiencies were found with the response time requirements to schedule and provide next-day service during normal business hours.

No deficiencies were found with how Met Council negotiates or schedules trip requests to within 60 minutes of the requested pickup time.

According to the Page 4 of the Service Guide, “Reservations are taken seven days per week between the hours of 6:00 a.m. and 5:00 p.m.” Riders can reserve trips from one to four days in advance either by

phone or through the Metro Mobility [website](#). According to Metro Mobility staff, riders can also request same-day non-ADA trips, which service providers try to accommodate without any guarantees.

Met Council's normal business hours are from 8 a.m. to 5 p.m. every day. By analyzing Metro Mobility's telephone reports, the review team was able to confirm that First Transit and Transit Team reservationists were on duty from 6 a.m. to 5 p.m. every day, accepting reservations two hours before the start of and until the end of Met Council's normal business day. The weekday telephone reports for Scott, Anoka, and Dakota Counties showed that reservationists were on duty from 7 a.m. to 5 p.m. on weekdays, accepting reservations for one hour before the start of and until the end of Met Council's normal business day.

Saturday and Sunday reservations reports for the three counties showed that reservationists answered calls from 8 a.m. to 4 p.m. While the 8 a.m. start time is consistent with the start of Met Council's normal business day, the 4 p.m. end time is one hour before the end of Met Council's business day.

Met Council's contracts with its county service providers reflect the incorrect end time for accepting reservations calls on weekends and holidays. (Sections 5.12 and 5.13 discuss the respective requirements for Met Council to ensure its private and public service providers comply with the response time requirements.)

Reservations hours as published in the Service Guide (6 a.m. to 5 p.m.) are inconsistent with actual practice in the three counties. On weekdays, the inconsistency applies to 6–7 a.m. On weekends, the inconsistency applies to 6–8 a.m. and 4–5 p.m.

According to the Service Guide, reservationists may negotiate pickup times up to 60 minutes before or after the requested pickup times. The review team observed that reservationists followed this policy. As discussed in Section 5.6 below, the review team also observed that when callers indicated appointment times for requested trips, reservationists provided pickup times that yielded scheduled drop-offs at requested destinations up to 60 minutes prior to requested arrival times. See Section 5.6 for findings of deficiency regarding Metro Mobility service due to a pattern of untimely drop-offs.

Corrective Action Schedule: Within 60 days of the issuance of the final report, Met Council must require Scott County, Anoka County, and DARTS to accept (at a minimum) trip reservations during normal business hours (i.e., until at least 5 p.m. every day).

Met Council must modify its contracts with these service providers to reflect this requirement.

In addition, Met Council must ensure that all public information (service guides, websites, etc.) reflects the corrected hours for making reservations with all service providers.

Fares

Requirement: Under 49 CFR § 37.131(c), complementary paratransit fares must be no more than twice the fixed route fares for the same trip at the same time of day on the fixed route system, excluding discounts. Transit agencies must allow eligible riders to travel with at least one companion (with additional companions accommodated on a space-available basis). If personal care attendants (PCAs) accompany riders, transit agencies must provide service to one companion in addition to the PCA. Companions may be charged the same fare as the eligible rider; no fare may be charged for a PCA.

Discussion: During this compliance review, deficiencies were found with the requirement that complementary paratransit fares must not exceed twice the fixed route fares at the same time of day.

No deficiencies were found with Met Council's fare policies for PCAs or companions or with how Met Council communicates Metro Mobility fares.

In the majority of the Metro Mobility service area, the complementary paratransit fares do not exceed twice the non-discounted fixed route fare. Table 5.3 summarizes Metro Transit and Metro Mobility fares and shows that Metro Mobility fares are less than twice the Metro Transit fares. Complementary

paratransit riders pay the higher (peak) fare only when both the negotiated and actual pickup times are within the peak time periods.

**Table 5.3 – One-way Fares for Metro Transit and Metro Mobility
(Excluding Reduced Fare and Free-fare Zones)**

Time (peak and off peak)	Metro Transit (bus & light rail)	Metro Mobility (complementary paratransit)
Monday–Friday 6–9 a.m., 3–6:30 p.m, excluding holidays	\$2.25	\$4.00
All other days and times	\$1.75	\$3.00

The Metro Mobility fare does not comply with the § 37.131(c) requirements in three geographic zones (shown on the Metro Transit system map and on Metro Transit’s [website](#)) that have reduced fares or no fares for bus and light rail service. Table 5.4 compares the Metro Mobility fares (peak and off-peak) with free Metro Transit service in the Nicolet Mall corridor and reduced fares for Metro Transit service in the downtown Minneapolis and downtown St. Paul zones. As shown, Metro Mobility fares are six to eight times higher than fares in the two downtown zones.

**Table 5.4 – One-way Fares for Metro Transit and Metro Mobility
(Reduced Fare and Free-fare Zones)**

Time (peak and off peak)	Metro Transit (bus & light rail)		Metro Mobility (complementary paratransit)
	Nicolet Mall	Downtown Minneapolis and Downtown St. Paul	
Monday–Friday 6–9 a.m., 3–6:30 p.m., excluding holidays	Free	\$0.50	\$4.00
All other days and times	Free	\$0.50	\$3.00

To comply with the § 37.131(c) requirements, complementary paratransit trips that have an origin and destination within 3/4-mile of any of these three geographic zones (but not from one zone to another), cannot exceed twice the fixed route fares in these zones. In the downtown Minneapolis and St. Paul zones, the maximum fare Metro Mobility can charge is \$1.00. In the Nicollet Mall free-fare zone, Metro Mobility cannot charge any fare. Alternatively, Met Council may undertake an analysis to determine which trips a typical fixed route rider would take using the free or reduced-fare service and which trips they would take via services with a fare, and use that information to establish a comparable fare for trips between points within 3/4-mile of these routes.

PCAs pay no fare while companions pay the same fare as Metro Mobility riders.

Corrective Action Schedule: Within 60 days of the issuance of the final report, Met Council must revise its Metro Mobility fares to not exceed twice the fares for all comparable fixed route trips in the service area, including trips with origins and destinations within its reduced-fare and free-fare zones.

No Trip Purpose Restrictions

Requirement: Under 49 CFR § 37.131(d), there can be no restrictions or priorities based on trip purpose. When a user reserves a trip, the entity will need to know the origin, destination, time of travel, and how many people are traveling. The entity does not need to know why the person is traveling, and should not even ask.

Discussion: During this compliance review, no deficiencies were found with the prohibition against imposing restrictions or priorities based on trip purpose.

The review team observed that Metro Mobility reservationists do not ask riders for their trip purpose and do not enter any trip purpose data into the paratransit software system.

Hours and Days of Service

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

Discussion: During this compliance review, no deficiencies were found with the requirement to provide complementary paratransit service during the same hours and days as fixed route service or with how Met Council communicates the hours and days of Metro Mobility service.

Based on the review team's investigation of the Metro Mobility website and published schedules, Metro Mobility service hours are accurately linked to Metro Transit service hours in each community. Metro Transit and Metro Mobility operate 24-hour service in Minneapolis, St. Paul, Bloomington, and at MSP Airport. In other communities, Metro Transit and Metro Mobility services operate during normal daytime and evening hours. (Attachment J summarizes the Metro Mobility service hours for each community.)

Met Council's paratransit software incorporates information on Metro Mobility's start and end times throughout its service area. When Metro Mobility reservationists enter trip requests into the software, the system notifies them if the requests are within the fixed route service schedules and routes. According to Metro Mobility managers, when fixed route service times change, they update the software accordingly.

5.6 Absence of Capacity Constraints

Requirement: Under 49 CFR § 37.131(f), transit agencies may not limit the availability of complementary paratransit service to ADA paratransit eligible individuals by any of the following: restrictions on the number of trips an individual will be provided; waiting lists for access to the service; or any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons. Such patterns or practices include, but are not limited to: substantial numbers of significantly untimely pickups for initial or return trips, substantial numbers of trip denials or missed trips, or substantial numbers of trips with excessive trip lengths.

No Restrictions on the Number of Trips Provided to ADA Paratransit Eligible Individuals

Requirement: Under 49 CFR § 37.131(f)(1), transit agencies may not impose restrictions on the number of trips provided to ADA paratransit eligible riders.

Discussion: During this compliance review, no deficiencies were found with the prohibition against imposing restrictions on the number of complementary paratransit trips Metro Mobility provides to ADA paratransit eligible riders.

Met Council does not have a policy limiting the number of Metro Mobility trips. During review team observations, Metro Mobility reservationists did not limit the number of trips that a rider could reserve.

No Waiting List for Access to the Service

Requirement: Under 49 CFR § 37.131(f)(2), transit agencies are prohibited from establishing policies or engaging in practices and/or procedures that establish waiting list(s) for accessing the service.¹

Discussion: During this compliance review, no deficiencies were found with the prohibition against the use of waiting lists for access to non-subscription complementary paratransit service.

When Metro Mobility riders request “ADA trips” (at least one day in advance and within the complementary paratransit service area), Metro Mobility reservationists either directly confirm or negotiate pickup times within one hour before or after requested times.

Metro Mobility staff place some “non-ADA” trip requests onto waiting lists. These non-ADA trips typically have origins and/or destinations beyond the ADA service area.

No Substantial Numbers of Significantly Untimely Pickups for Initial or Return Trips

Requirement: Under 49 CFR § 37.131(f)(3)(i)(a), transit agencies must provide complementary paratransit service without any substantial numbers of significantly untimely pickups for initial or return trips.

Discussion: During this compliance review, no deficiencies were found with the requirement to provide complementary paratransit service without substantial numbers of significantly untimely pickups for initial or return trips or with how Met Council defines timely pickups. An advisory comment is made regarding electronic recordkeeping for taxi subcontractors.

Page 19 of the Service Guide, states “Drivers are considered “on time” if they arrive within a 30-minute window that follows the scheduled pickup.” Met Council’s contractual standard is 95 percent on-time performance, as reported on a monthly basis. Met Council defines on-time pickups as those occurring before the beginning of the “0/+30” pickup window as on-time pickups.

Met Council was unable to provide the review team with data demonstrating that Scott County is providing complementary paratransit service with timely pickups. (See Section 5.13 for deficiencies with respect to monitoring service provided by other public entities.)

Met Council was unable to provide the review team with data demonstrating that its taxi contractor (Taxi Services, Inc.) is providing complementary paratransit service with timely pickups for the trips it provides. (See Section 5.12 for a discussion of deficiencies with respect to monitoring service that private entities provide under contract.)

Met Council monitors on-time pickup performance for all but the aforementioned Scott County and Taxi Services trips. According to reports Met Council provided to the review team, during FY 2012, overall on-time pickup performance was 97.5 percent. In FY 2012, performance exceeded Met Council’s 95-percent standard every month except December (94.1 percent). Each service provider Met Council monitors exceeded the standard in all months except December. For the first eight months of FY 2013, reported on-time pickup performance exceeded Met Council’s standard in all months except March (94.5 percent). All monitored service providers, with the exception of First Transit demand trips exceeded the standard in all eight months of FY 2013. First Transit’s reported on-time performance for demand trips during the eight-month period averaged 93.4 percent and ranged from 90.8 to 95.2 percent.

¹ Under § 37.133(c), waiting lists may only be established for participation in subscription service that may be offered as part of the transit agency’s complementary paratransit system.

The review team independently assessed Metro Mobility's on-time performance by analyzing complementary paratransit trip data from its paratransit software for the September 8–14, 2013 sample week for the following service providers:

- Anoka County
- DARTS
- First Transit (agency trips)
- First Transit (demand trips)
- Transit Team

Table 5.5 summarizes the results of the review team's analysis, which yielded an overall on-time pickup performance rate of 95.3 percent, indicating that 4.7 percent of trips were late. Of these, 3.8 percent were 1–15 minutes late and less than 1 percent were more than 15 minutes late. The lowest performing service provider was First Transit (demand trips), with 91.4 percent of its pickups on time during the sample week.

Table 5.5 – Sample On-Time Performance for Metro Mobility ADA Trips (September 8–14, 2013)

	Anoka County	DARTS	First Transit agency	First Transit demand	Transit Team	Total
All pickups	827	3,524	7,060	9,687	12,753	33,851
Early	7.7%	30.0%	41.2%	29.2%	35.2%	33.7%
1–15 minutes early	7.7%	20.5%	36.1%	25.9%	30.4%	28.7%
>15 minutes early	0%	9.5%	5.7%	3.3%	4.8%	4.9%
In window	88.7%	66.5%	56.6%	62.2%	61.0%	61.6%
All early/in window	96.4%	96.5%	98.4%	91.4%	96.2%	95.3%
All late	3.6%	3.5%	1.6%	8.6%	3.8%	4.7%
1–15 minutes late	3.6%	2.7%	1.5%	6.5%	3.3%	3.8%
16–30 minutes late	0%	0.7%	0.1%	1.4%	0.4%	0.6%
>30 minutes late	0%	0.1%	0%	0.7%	0.1%	0.3%

Overall, 33.7 percent of pickups occurred prior to the beginning of the pickup window. However, of these early pickups, most (28.7 percent) were 1–15 minutes early. This does not demonstrate a substantial number or pattern of early pickups that would discourage riders from using Metro Mobility. Furthermore, interviews with drivers and observations of dispatch did not identify any practice or policy of coercing riders to enter the vehicles earlier than they were obligated to under Metro Mobility policy.

Advisory Comment: When using taxi contractors for complementary paratransit service, an effective practice is to establish electronic recordkeeping to monitor taxi contractor performance.

No Substantial Numbers of Trip Denials or Missed Trips

Requirements: Under 49 CFR § 37.131(f)(3)(i)(b), transit agencies must provide complementary paratransit service without substantial numbers of trip denials or transit agency missed trips. A denial occurs whenever a transit agency is unable to provide a trip on a next-day basis as requested by an eligible passenger between points within the complementary paratransit service area, at a time when the fixed route system is operating, subject to the limitations on trip time negotiation. Under 49 CFR § 37.131(b), transit agencies may negotiate pickup times with a passenger, but cannot require the passenger to schedule a trip to begin more than one hour before or after his or her desired departure time. If the trip cannot be arranged within this timeframe, a denial has occurred whether or not the passenger

accepts a departure time of more than one hour earlier or later. In addition, when a denied trip makes a subsequent requested trip impossible, as could occur in the case of an individual taking a round trip to and from a specific location, two trips have been denied.

Discussion: During this compliance review, no deficiencies were found with the requirement to provide complementary paratransit service without substantial numbers of trip denials or missed trips.

Based on materials Met Council provided to the review team, Met Council’s missed trip definition is, “The Vehicle arrives more than 30 minutes AFTER the scheduled pickup time AND is either UNABLE to locate the passenger OR the passenger cancels the trip due to the late vehicle arrival.”

The review team examined the paratransit software data for the first eight months of FY 2013 and determined that four complementary paratransit trip denials occurred out of 1.17 million trips provided during the eight-month period. See Section 5.8 for a discussion and analysis of how service providers code missed trips.

No Substantial Numbers of Trips With Excessive Trip Lengths

Requirement: Under 49 CFR § 37.131(f)(3)(i)(c), transit agencies must provide complementary paratransit service without substantial numbers of trips with excessive trip lengths. Comparability is based on the length of time required to make a similar trip between the same two points using the fixed route system, including time spent traveling to and from a boarding point and waiting for the fixed route vehicle to arrive. FTA recommends basing complementary paratransit travel time on the comparable fixed route travel time, plus 20–30 minutes to allow for a reasonable estimate of time spent walking to and from a bus stop, waiting for the bus to arrive, and making any necessary transfers from one vehicle to another.

Discussion: During this compliance review, deficiencies were found limiting the availability of Metro Mobility service due to an operational pattern of trips with excessive trip lengths for certain riders.

Deficiencies were also found with Met Council’s performance standard for long trips.

The review team analyzed 21,578 Metro Mobility’s complementary paratransit trips for its three largest service providers during the September 8–14, 2013 sample week to determine the proportion of trips with excessive trip lengths. (The analysis omitted Anoka County and DARTS because less than 1 percent of these providers’ trips were 61–90 long minutes and none were longer than 90 minutes; Scott County data were not available.) (See Section 5.13 for deficiencies with respect to monitoring service provided by other public entities.)

As shown in Table 5.6, approximately 90 percent of the 21,578 sample week trips took 60 minutes or less while slightly more than 1 percent of the trips exceeded 90 minutes. All told, 10.2 percent of the trips took longer than 60 minutes.

**Table 5.6 – Trip Duration for Metro Mobility’s Three Largest Providers
Week of September 8–14, 2013**

Provider	Sample Size	Trips ≤ 60 Minutes	Trips 61–90 Minutes	Trips > 90 Minutes	All trips >60 Minutes
First Transit (demand)	7,779	91.3%	7.7%	1.0%	8.8%
First Transit (agency)	4,576	81.3%	15.9%	2.8%	18.7%
Transit Team	9,223	92.6%	6.9%	0.4%	7.3%
Total	21,578	89.7%	9.1%	1.1%	10.2%

To identify a pattern or practice limiting service availability due to excessively long trips, the review team also analyzed transfer trips and a sample of long trips. For each trip, the review team used Google Maps to determine travel times for comparable fixed route trips. Google Maps estimates walking speeds of three MPH (20 minutes/mile).

The review team's analysis of transfer trips did not reveal a pattern or practice of excessively long trips. Trips between the same origins and destinations using fixed route service were of comparable length.

The analysis of trips longer than 90 minutes consisted of two steps. In the first step, the review team obtained a sample of 32 trips longer than 90 minutes, divided among First Transit demand (12 trips), First Transit agency (10 trips), and Transit Team (10 trips).

The analysis showed that five of the ten Transit Team sample trips were more than 20 minutes longer than their respective comparable fixed route trips. As noted in Table 5.7, 7.3 percent of Transit Team's trips took more than 60 minutes.

Ten of First Transit's 12 demand trips were more than 20 minutes longer than their respective comparable fixed route trips. As noted in Table 5.7, 8.8 percent of First Transit's demand trips took more than 60 minutes.

The analysis of First Transit's agency trips showed that nine of the 10 trips in the sample were more than 20 minutes longer than their comparable fixed route trips. Because Met Council's contract with First Transit for agency trips is exclusively for group trips to social service facilities, the review team further investigated these trips. A potential concern with group trips is excessively long travel times for the group members who reside farthest from their common destination. Such "first on-last off" vehicle runs may pick up the riders farthest from each destination first and pick up additional riders en route. On return trips, the reverse pattern can occur.

The analysis of First Transit's agency trips identified vehicle runs with travel times exceeding 60 minutes (approximately 850 trips). After sorting these long trips by passenger ID, the review team identified nine passengers who experienced multiple trips exceeding 60 minutes. Table 5.7 summarizes this analysis for 72 trips the nine passengers took during the sample week, and shows that seven of these long trips were more than 20 minutes longer than comparable fixed route trips. While not a substantial number of excessively long trips as compared to the number of trips in the sample week, at least one rider (#9) experienced a clear pattern of trips with excessive trip lengths. During the sample week, First Transit provided rider #9 with 10 trips to and from Walker Methodist Health Center (3737 Bryant Avenue South, Minneapolis) and four of rider #9's trips took longer than the comparable fixed route travel time by more than 20 minutes.

Met Council's service provider contracts include performance standards for long trips stating, "Customer ride times shall not exceed 90 minutes for more than one percent of all customer trips in a calendar month." This standard is deficient because it fails to compare Metro Mobility trip lengths with the length of comparable fixed route trips. In addition, in cases where riders are transferring between two service providers, Met Council's standard permits 90 minutes for each leg of such trips, allowing trips two providers serve to take three hours and still meet Met Council's performance standard.

Corrective Action Schedule: Within 60 days of the issuance of the final report, Met Council must develop and implement procedures to: identify Metro Mobility trips of excessive length; ensure that riders do not experience a substantial number of trips with excessive trip length; monitor trip lengths and eliminate any such patterns.

Met Council must establish a trip-length standard based on the length of comparable fixed route trips (e.g., "Metro Mobility trips should not exceed the length of the comparable fixed route trip"). Met Council may include walking time to and from bus stops or rail stations in the comparison. Met Council must apply the revised standard to all Metro Mobility trips, including those that include transfers.

**Table 5.7 – Sample of First Transit Agency Riders with Frequent Long Trips
Week of September 8–14, 2013**

Rider	Morning/Afternoon Trip	Comparable Fixed Route Time (mins.)	Trips Exceeding Comparable Fixed Route Time by More Than 20 Minutes
1	Morning	118	0 of 5
2	Morning	98	0 of 5
3	Morning	92	0 of 5
3	Afternoon	93	1 of 4
4	Morning	106	0 of 5
5	Morning	111	0 of 5
5	Afternoon	108	0 of 5
6	Morning	96	2 of 5
6	Afternoon	97	0 of 3
7	Morning	82	0 of 5
7	Afternoon	90	0 of 5
8	Morning	92	0 of 5
8	Afternoon	102	0 of 5
9	Morning	78	3 of 5
9	Afternoon	84	1 of 5
Total			7 of 72

No Operational Patterns or Practices Limiting the Availability of Service to ADA Paratransit Eligible Individuals – Telephone Hold Times

Requirement: Under 49 CFR § 37.131(f), transit agencies may not limit the availability of complementary paratransit service to ADA paratransit eligible individuals by any operational patterns or practices that significantly limit availability of service to ADA paratransit eligible people. Examples of such operational patterns or practices include insufficient capacity to take reservations, long telephone hold times, and untimely drop-offs for appointments.

Discussion: During this compliance review, deficiencies were found with policies limiting the availability of Metro Mobility service due to long telephone hold times.

Deficiencies were also found with Met Council’s telephone hold time standard.

Deficiencies were also found due to occasional busy signals, as reported by Metro Mobility riders.

Met Council’s telephone standard for its service providers states, “Average reservations response time shall not exceed 90 seconds on average on any given day.” Met Council’s standard overlooks whether callers are on hold longer than specific periods, e.g., longer than three minutes. (Sections 5.12 and 5.13 discuss the respective requirements for Met Council to monitor its private and public service providers’ telephone performance.) Average response times can easily mask both very long and very short hold times. A more appropriate measurement is the percentage of calls that remain on hold for long periods, which may reveal patterns that limit telephone access.

The review team analyzed the available reports of average wait times for three weeks of data (September 8–28, 2013) covering 231 hours for callers to Transit Team and First Transit. Although the reports did not indicate how many calls on hold exceeded a more appropriate standard, the average wait times indicated patterns that substantially limited access to Metro Mobility. During the three-week period, callers to Transit Team experienced average waits exceeding two minutes in 37 of the hours while callers to First Transit experienced average waits exceeding two minutes in 36 of the hours. Average waits exceeding two minutes imply that many callers during these hours experienced wait times much longer than two minutes. Transit Team’s Chief Executive Officer reported that they had call center staffing vacancies at the time of the site visit.

The review team also analyzed telephone performance data for the smaller service providers during the same sample week. The data revealed that callers to Anoka County experienced average wait times longer than two minutes for 3.6 percent of the hours analyzed. Riders calling DARTS experienced average waits longer than two minutes for 40.3 percent of the hours, with waits longer than five minutes during several hours.

In the review team's interviews with Metro Mobility riders, some reported experiencing occasional busy signals when they tried to make trip reservations in the early morning. Busy signals are different from call holds because the calls never reach a service provider's phone system, and they are therefore not included in Met Council's call data. Met Council managers stated they were adding more telephone lines and expected to have more capacity in place by December 2013.

Corrective Action Schedule: Within 60 days of the issuance of the final report, Met Council must begin analyzing the distribution of long wait times on an hourly basis and communicate to its contractors its threshold for unacceptably long wait times. If this analysis confirms that wait times exceeding that threshold are common, Met Council must take action to provide an adequate number of call-takers during the days and hours when these long waits occur.

Met Council must also report on its progress to increase line capacity to the call centers and reduce the incidence of busy signals.

No Operational Patterns or Practices Limiting the Availability of Service to ADA Paratransit Eligible Individuals – Untimely Drop-offs for Appointments

Requirement: Under 49 CFR § 37.131(f), transit agencies may not limit the availability of complementary paratransit service to ADA paratransit eligible individuals by any operational patterns or practices that significantly limit availability of service to ADA paratransit eligible people. Examples of such operational patterns or practices include insufficient capacity to take reservations, long telephone hold times, and untimely drop-offs for appointments.

Discussion: During this compliance review, deficiencies were found limiting the availability of Metro Mobility service due to a pattern of untimely drop-offs.

Deficiencies were also found with the operational practice of failing to enter drop-off times for a portion of Metro Mobility trips with actual appointment times into the paratransit software.

Met Council encourages riders to provide known appointment times for requested trips. Page 4 of the Service Guide suggests that riders have available “the time you would like to be picked up or the time you need to arrive at your destination (appointment time).” The Service Guide also offers the following advice:

Getting to an appointment on time:

1. Tell the reservationist you have an appointment time.
2. Build in travel time from the drop-off location to your destination inside the building.
3. Remember, it's a shared-ride service. You may not get a direct ride.

The Service Guide does not specify drop-off windows or Met Council's standard for on-time drop-offs. Met Council's service provider contracts allow a window of 60 minutes before and up to the appointment time (-60/0 minutes), stating, “No less than 90% of the trips with a designated appointment time will be dropped off between 0 and 60 minutes before the designated appointment time.” A 60-minute drop-off window is a potential indicator of capacity constraints as it has the potential to discourage eligible riders' use of the service. Met Council has an implicit obligation to get riders to appointments on time (not late). A model drop-off policy would also get riders to appointments not substantially early (for example, no more than 30 minutes early).

Met Council does not regularly obtain drop-off performance data from all of its service providers. (Sections 5.12 and 5.13 discuss the respective requirements for Met Council to monitor its private and public service providers' drop-off performance.)

The review team examined Metro Mobility's on-time performance for drop-offs using data from the September 8–14, 2013 sample week for the following service providers:

- Anoka County
- DARTS
- First Transit agency
- First Transit demand
- Transit Team

Table 5.8 summarizes the analyzed drop-off performance. The analysis, which is based on reconciled data for all trips scheduled that Metro Mobility provided (from the paratransit software), includes only those trips that had a specified drop-off time in the paratransit software. As shown, drop-off performance for this sample week was approximately 87 percent on time and 13 percent late. This indicates a potential capacity constraint. First Transit agency, First Transit demand, and Transit Team did not meet Met Council's travel time standard, while Anoka County and DARTS did.

In addition, 3.7 percent of the sample trips had drop-offs more than 60 minutes early ("very-early drop-offs"), which is also outside Met Council's drop-off window (-60/0 minutes). DARTS' sample showed the highest rate of very early drop-offs at 11.2 percent. Overall drop-off performance, which includes late drop-offs plus very early drop-offs, shows that only Anoka County, with 89.9 percent of trips dropped off within the window, effectively met Met Council's drop-off standard.

Drop-off windows help ensure that riders arrive on time for requested appointments and also help prevent riders from arriving too early. Met Council's drop-off window of -60/0 minutes can lead to concerns for riders with appointments—particularly those with early morning appointments—who may arrive well in advance of when the building opens.

The last two rows of Table 5.8 show that three of the service providers' trip records had relatively low percentages of completed trips with a drop-off time (DARTS, First Transit agency, and First Transit demand). In FTA's experience, 35–45 percent of complementary paratransit trips typically have scheduled designated drop-off times, which correspond to "going" trips where riders need on-time arrivals for example, for medical appointments, work, school, or other appointments.

First Transit agency reported just 2.6 percent of its trips with appointment times, which is likely inaccurate since Met Council structures the agency contract so nearly all of its riders attend programs with specific start times (e.g., adult daycare, day training and rehabilitation centers, etc.).

One possible explanation for the low percentages of trips with drop-off times is that the service providers did not enter riders' appointment times into the paratransit software. Failure to enter this information from the software also means it is not printed on driver manifests and is unavailable to dispatchers. Drivers and dispatchers may claim they are familiar with repeat riders' appointment times, but this practice does not account for changes in riders' appointment times or driver turnover.

**Table 5.8 – Sample On-Time Drop-off Performance for Metro Mobility ADA Trips
September 8–14, 2013**

	Anoka County	DARTS	First Transit agency	First Transit demand	Transit Team	Total
All trips with requested drop-offs	325	952	185	2,714	5,176	9,352
0–30 minutes early	50.2%	52.2%	48.7%	50.7%	57.8%	54.7%
31–60 minutes early	39.7%	31.6%	12.4%	35.4%	24.2%	28.5%
61+ minutes early (very early)	4.6%	11.3%	6.5%	3.4%	2.2%	3.6%
All on time	94.5%	95.1%	67.6%	89.5%	84.2%	86.8%
1–15 minutes late	4.9%	4.2%	0%	7.3%	10.4%	8.5%
16–30 minutes late	0.6%	0.5%	29.7%	2.6%	3.5%	3.4%
31+ minutes late	0%	0.2%	2.7%	0.6%	1.9%	1.3%
All late	5.5%	4.9%	32.4%	10.5%	15.8%	13.2%
All late plus very early	10.1%	16.2%	38.9%	13.9%	18.0%	16.8%
Overall drop-off performance (0-60 minutes early)	89.9%	83.8%	61.1%	86.1%	82.0%	83.2%
All completed trips	827	3,524	7,060	9,687	12,753	33,851
Percent completed trips with a drop-off time	39.3%	27.0%	2.6%	28.0%	40.6%	27.6%

Note: shaded cells identify particular performance concerns

The review team analysis of sample on-time drop-off performance does not include trips Scott County or Taxi Services, Inc. provide. Met Council does not receive drop-off data from either Scott County or Taxi Services, so it cannot measure or monitor these two providers' drop-off performance.

Corrective Action Schedule: Within 60 days of the issuance of the final report, Met Council must reduce the number of very early drop-offs.

Met Council must ensure that all of its service providers ask riders to provide appointment times when making reservations, and then enter these times into the paratransit software.

5.7 Subscription Service

Requirement: Under 49 CFR § 37.133, transit agencies are permitted (but not required) to provide subscription service (pre-arranged trips at a particular time not requiring individual trip reservations for each trip). If provided, however, subscription service may not comprise more than 50 percent of the available trips at any given time unless the system is experiencing no capacity constraints.

Discussion: During this compliance review, deficiencies were found with Met Council's subscription trips, which comprise more than 50 percent of Metro Mobility trips because of capacity constraints.

Met Council offers subscription ("standing order") service to Metro Mobility riders. Riders who travel between the same origin and destination at the same time at least once per week may establish standing orders at no additional charge. Met Council treats subscription trips the same as demand trips (e.g., use of a 30-minute pickup window, requirements to cancel at least one hour in advance, etc.). The Service Guide (Page 9) states: "Some requests for standing orders may not be accepted based on capacity." If Met Council does not accept a specific standing order request, riders may still request a trip as a demand trip.

Based on an analysis of the three largest service providers, 42 percent of Metro Mobility's ADA trips during the September 8–14, 2013 sample week were subscription trips overall, and the proportion

exceeded 50 percent in the early morning and mid-afternoon hours. (Agency contract trips are subscription trips.)

As discussed in Section 5.6, because this review identifies capacity constraints in Metro Mobility service, a pattern of excessively long trips for certain riders, limitations on telephone access, and untimely drop-offs, Met Council must ensure that subscription service does not exceed more than 50 percent of all service during the hours capacity constraints occur.

Corrective Action Schedule: Within 60 days of the issuance of the final report, Met Council must analyze its subscription (standing order) trips for all Metro Mobility service providers to compare these hours with times when there are capacity constraints. During those hours, Met Council must limit subscription service to 50 percent of all trips.

5.8 Reasonable Policies for Proposed Service Suspensions for Missing Scheduled Trips and the Right to Appeal

Requirements: Section 37.125(h) of the DOT ADA regulations states that transit agencies “may establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit service to ADA eligible individuals who establish a pattern or practice of missing scheduled trips.” FTA has permitted transit agencies to regard late cancellations as no-shows if and only if they have the same operational effect on the system as a no-show, generally within less than 1–2 hours of the scheduled trip time. If riders do not show up for the outgoing portions of round trips, transit agencies cannot automatically assume that the return trip is not needed.

Under 49 CFR § 37.125(h)(1), trips missed by riders for reasons beyond their control, including trips missed due to operator or transit agency error, must not form a transit agency’s basis for determining that such a pattern or practice exists. The transit agency’s policies must therefore distinguish between no-shows that are within the rider’s control and those that are not, and propose sanctions only on the basis of the former. In order to establish whether a rider has engaged in a pattern or practice of missing scheduled trips, the transit agency must also account for a passenger’s frequency of use. The appeal process required under § 37.125(g) must be available to an individual on whom sanctions have been imposed, and the sanction must be stayed pending the outcome of the appeal.

Discussion: During this compliance review, deficiencies were found with Met Council’s no-show policies, which improperly designate as no-shows riders who cannot pay the fare or present proper identification.

Deficiencies were also found with Met Council’s no-show warning and suspension letters, which do not inform riders that they can dispute no-shows outside of their control.

Deficiencies were also found with Met Council’s no-show suspension policy, which does not consider the proportion of no-shows relative to the rider’s frequency of travel.

Deficiencies were also found with the lengths of the potential no-show suspensions.

Deficiencies were also found with Met Council’s no-show suspension appeal process, which does not provide the requisite separation of functions or permit appellants to attend an Appeal Panel hearing.

Deficiencies were also found with Met Council’s practice of cancelling return trips when riders are no-shows for outgoing trips.

No deficiencies were found with how Met Council’s two largest service providers (First Transit and Transit Team) code no-shows; the review team did not review other service providers’ practices. An advisory comment is made regarding confirming return trips for riders who are no-shows for initial scheduled trips.

Pages 4 and 6 of the Service Guide define the 30-minute pickup window and the 60-minute (trip reservations) negotiation window, and informs riders that, “you are not required to board until your scheduled ready time. However, if you are ready to go early you may board the vehicle before the scheduled ready time.” Page 7 of the Service Guide explains Metro Mobility’s no-show process. Met Council charges riders with no-shows when they:

- Cancel a trip less than one hour before the scheduled pickup time
- Cancel or refuse a trip when the vehicle arrives within the 30-minute pickup window²
- Are not at the designated pickup point at the ready time and during the 30-minute pickup window
- Do not have the required fare
- Do not have proper Metro Mobility identification

While transit agencies are permitted to refuse service when riders cannot pay the fare or do not have the required ID, transit agencies are not permitted to suspend riders for such infractions.

A Metro Mobility CSS sends letters to riders who accumulate three no-shows within a 30-day period warning them of a suspension of service if they accumulate a fourth within the same 30-day period. Before sending out these warning letters, the CSS reviews the records for each of the charged no-shows to confirm their accuracy.

In instances of a fourth no-show within 30 days, the CSS reconfirms the records before sending riders suspension letters. The length of suspensions varies as follows:

- 30-day suspension for the first pattern of four no-shows in 30 days
- 30-day suspension for the second pattern of four no-shows in 30 days
- 45-day suspension for the third pattern of four no-shows in 30 days
- 60-day suspension for the fourth pattern of four no-shows in 30 days
- 90-day suspension for the fifth pattern of four no-shows in 30 days
- 120-day suspension for the sixth pattern of four no-shows in 30 days

The warning and suspension letters include detailed lists of all recorded no-shows. The letters also invite riders to call or email the Service Center to dispute any no-shows that were “the result of driver, dispatch or reservationist error.” The letters do not inform riders of the right to dispute no-shows outside of their control or those due to transit agency error.

Met Council’s no-show suspension policy is based on the absolute number of no-shows; the policy does not compare the number of trips taken within a 30-day period and the number of no shows, as the policy must not unfairly penalize frequent or infrequent riders. Four no-shows in a 30-day period may reflect a small percentage of trips a frequent rider takes, and may not reflect a pattern or practice of missing scheduled trips. For example, a rider who requests 80 trips in one month and has four no-shows has a no-show rate of 5 percent. If this percentage approximates the Metro Mobility systemwide average, this percentage would not amount to abuse of the service.

Furthermore, the lengths of the proposed suspensions do not represent “reasonable periods of time.”

Met Council has established a four-step appeal process for riders to dispute no-shows and suspensions. (See Attachment K) and does not carry out any suspensions until all appeals options are exhausted. In step one, a CSS—the same person that issues suspensions—reviews the appeal and may uphold the suspension. The CSS can offer riders a 30-day probationary period, after which Met Council can then

² Upon arrival, Met Council requires its service providers to have its drivers wait at least five minutes within the 30-minute pickup window before recording riders as no-shows.

rescind the suspension. Riders not satisfied with the disposition of their appeal can advance to the next step.

In step two, the CSM, who supervises the CSS, reviews the appeal. He or she can make a one-time exception to reduce the length of the proposed suspension by half. He or she can also offer a 30-day probationary period if the CSS did not previously make this offer. Riders not satisfied with the disposition of their appeal can advance to the next step.

In step three, Metro Mobility's Senior Manager, who supervises the CSM, reviews the appeal. He or she has the discretion to grant exceptions, such as offering a 30-day probationary period or reducing or modifying the suspension. Riders not satisfied with the disposition of their appeal can advance to the next step.

In the fourth and final step, riders can request a review by Met Council's Appeal Panel (see above). During this review, Metro Mobility's Senior Manager attends an Appeal Panel meeting and describes the no-show policy, explains the no-shows in question, and describes the riders' no-show history. The Appeal Panel then sustains or overrules the proposed suspension.

Met Council's appeal process does not correctly separate functions since the CSS reviewing the appeal is the same person proposing the suspension. The individuals reviewing the second and third level appeals supervise the CSS and are within the same department. The fourth level of appeal, while an appropriate separation of functions, does not allow suspended riders to present their case at an Appeal Panel hearing.

Met Council does not monitor how its service providers code no-shows. (Sections 5.12 and 5.13 discuss Met Council's respective requirements to monitor how its private and public service providers document no-shows.)

The review team examined a sample of First Transit and Transit Team paratransit software data of scheduled trips coded as rider no-shows. As summarized in Table 5.9, First Transit and Transit Team coded 312 scheduled trips as rider no-shows during the September 8–14, 2013 sample week. The review team analyzed these trips to determine if drivers:

- Arrived within the 30-minute pickup window and waited at least five minutes before departing without picking up the rider (which should have been coded as a no-show)
- Arrived within or before the 30-minute window and departed before waiting at least five minutes within the 30-minute pickup window without picking up the rider (which should have been coded as a missed trip)
- Arrived after the 30-minute window without the rider being transported (which should have been coded as a missed trip)

Table 5.9 – Review of No-Show Coding for September 8–14, 2013 Sample Week

Service provider	First Transit (agency + demand)	Transit Team	Total	Percent
Total no-shows recorded	138	174	312	100%
Actual no-shows	134	169	303	97.1%
Driver waited <5 minutes	0	3	3	1.0%
Driver arrived after window ended	4	2	6	1.9%
Total missed trips incorrectly coded	4	5	9	2.9%

As shown in the table, First Transit and Transit Team correctly coded as no-shows 303 of the 312 trips they recorded. No-shows that were actually missed trips comprised three trips where drivers waited less than the required five minutes (1.0 percent) and six trips where drivers arrived after the 30-minute window ended (1.9 percent). This yields an overall no-show coding error rate of 2.9 percent.

According to the Service Guide, “If a rider ‘No Shows’ the outgoing leg of their trip, all other scheduled trips for that day will be cancelled unless the rider contacts the provider within one hour of the ‘No Showed’ ride.”

Transit agencies must consider each leg of a trip as a separate trip request and cannot automatically cancel other scheduled trips that day if a rider is a no-show for the first leg of a trip. Met Council may only cancel subsequent trips upon the rider’s notification.

Corrective Action Schedule: Within 60 days of the issuance of the final report, Met Council must cease the practice of charging no-shows against riders who do not pay the fare or who do not present a Metro Mobility ID card.

Met Council must revise its no-show warning and suspension letters to state that riders can dispute no-shows they believe were outside of their control.

Met Council must revise its no-show suspension policy to reflect the percentage of no-shows relative to the rider’s frequency of travel rather than only an absolute number of no-shows and establish suspension periods of reasonable length.

Met Council must revise its appeals process for disputing no-show suspensions by providing the requisite separation of functions between those initially proposing service suspensions and those deciding appeals. The revised process must also permit riders facing service suspension to continue to receive service pending the outcome of the appeal.

When a rider is a no-show for an outgoing trip, Met Council must no longer cancel the return trip unless Met Council contacts the rider and confirms that the rider does not need the return trip; Met Council must also revise its policy documents and public information regarding no-shows accordingly.

Advisory Comment: An effective practice is to review a sample of trip requests coded as no-shows to ensure that they are in fact no-shows. In particular, transit agencies should verify any no-shows for riders facing a suspension for excessive no-shows.

5.9 Complaint Resolution and Compliance Information

Requirements: Under 49 CFR § 27.13(b), transit agencies must have administrative procedures in place that incorporate appropriate due process standards and provide for the prompt and equitable resolution of complaints. Under 49 CFR § 27.121(b), transit agencies must keep all complaints of noncompliance on file for one year and a record of all such complaints (which may be in summary form) for five years.

Discussion: During this compliance review, no deficiencies were found with the requirement to have administrative procedures in place that incorporate appropriate due process standards or with how Metro Mobility communicates its complaint policies and procedures. An advisory comment is made regarding the ability to submit comments via Metro Mobility’s website.

No deficiencies were found with the requirement to resolve complaints promptly and equitably and file summaries and records of complaints.

The Metro Mobility Service Guide includes a page immediately following the table of contents titled, “Resolution of Service Problems,” with telephone numbers and an email address to contact the Service Center, as well as suggestions on how to report incidents. This page states, “When an issue is filed with Metro Mobility Service Center, customer service staff will:

- Record a detailed description of the issue
- Research the complaint
- Forward information to the transportation provider to help quickly resolve the issue

Metro Mobility's web page www.metromobility.org provides links to the Service Guide, customer service telephone numbers, and a link that generates an email to customer service.

Metro Mobility's Service Guide states, "Customers can expect a response to their complaint within two working days if requested." Metro Mobility's CSM provided its reports to the review team summarizing ADA complaints Met Council received during the first nine months of 2013. Met Council maintains full records of all complaints for more than five years—whether received by letter, e-mail, or telephone call—documenting all complaints and their resolutions. Based on a review of the complaint files, the review team concluded that Met Council resolves complaints promptly (generally within five days) and consistently documents complaints and their resolutions in detail.

One file contained a rider complaint that the driver on a particular trip took an indirect route, which resulted in her arriving late to her medical appointment. The resolution column in the file stated, "The driver took a bad route in this case. Driver will be educated on route decisions and client will be sent a ride coupon for her trouble."

The number of complaints filed against Metro Mobility's service providers ranged from 0.1 to 0.74 complaints per 1,000 trips provided.

Advisory Comment: The Metro Mobility webpage does not provide a direct link related to complaints. At the time of the site visit, the web page stated, "Questions, Call Customer Services at 651.602.1111 (TTY 651.221.9886) between 7:30 a.m. and 4 p.m., Monday through Friday" followed by a hyperlink, "Send your e-mail questions or comments to Metro Mobility." Clicking on this link generated an email. In addition, the website featured two "contact us" links, one on the top right of the page and one on the bottom left of the page. Each of these links connected to a different page and neither of these links referenced comments or complaints about service. An effective practice is for transit agencies to have a customer support tab on the website that links to a form for riders to enter information, comments, and includes an address and telephone number that allows riders to mail or call in a complaint.

5.10 Nondiscrimination

Requirement: Under 49 CFR § 37.5, transit agencies are prohibited from discriminating against an individual with a disability in connection with the provision of transportation service, or deny any individual with a disability the opportunity to use the transportation services it provides to the general public. Discriminatory practices include and are not limited to requiring the use of alternate transportation services, requiring persons with disabilities to be accompanied by an attendant, imposing user fees or special charges upon people with disabilities and requiring people with disabilities to use designated priority seating.

Discussion: During this compliance review, deficiencies were found with Met Council's requirement that Metro Mobility riders under age six travel with personal care attendants (PCAs) (Page 6 of the Service Guide). This requirement discriminates against individuals with disabilities because Met Council does not require Metro Transit fixed route riders under age six to travel with PCAs. A nondiscriminatory policy would require all children under age six to travel with an adult on any transportation service.

Deficiencies were also found with Met Council's practice of permitting its service providers to transfer riders from one provider to another without waiting with riders who cannot be left unattended. Riders needing to transfer vehicles who cannot be left unattended would require an attendant to accompany them, which is a discriminatory practice.

Corrective Action Schedule: Within 60 days of the issuance of the final report, Met Council's age policy for riders under age six must be the same on both Metro Mobility and Metro Transit.

Met Council must also change its policies and procedures for Metro Mobility trips that include transfers so that riders who cannot be left unattended are not also required to travel with attendants to transfer between vehicles to complete their trips.

5.11 Training Requirements

Requirement: Under 49 CFR § 173, each public or private entity which operates a fixed route or demand responsive system shall ensure that personnel are trained to proficiency, as appropriate to their duties, so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service in a respectful and courteous way, with appropriate attention to the difference among individuals with disabilities.

Discussion: During this compliance review, no deficiencies were found with the requirement to train personnel to proficiency as appropriate to their duties, or with how Met Council communicates, manages and/or oversees training requirements with respect to staff or its service providers. An advisory comment is made regarding effective reservations practices.

Prior to the site visit, the review team conducted telephone interviews with current Metro Mobility riders. The interviews covered the quality of service that reservationists, drivers, and Metro Mobility staff and its service providers provide, and the riders' satisfaction with the resolution of complaints presented to Metro Mobility staff. These telephone interviews helped the review team identify potential concerns warranting further investigation during the site visit. For example, one concern identified was the lack of experience of some newer Metro Mobility drivers in navigating the service area.

Met Council trains its Metro Mobility staff. Each Metro Mobility service provider is responsible for training its drivers, schedulers, dispatchers, customer service staff, and other staff. Met Council is also responsible for setting the system parameters in the paratransit software that all of its service providers use.

The review team met with and observed reservationists, schedulers, dispatchers, and drivers working for the two largest Metro Mobility service providers, First Transit (demand and agency) and Transit Team.

The review team observed how reservationists accept ADA and non-ADA trip requests at both First Transit and Transit Team. They observed requests for 123 trips at First Transit and 119 trips at Transit Team. Reservationists did not deny any trip requests. They handled three refusals properly, i.e., when they offered a trip within one hour of the pickup time requested by the rider and the rider turned down the offer, they recorded this as a "refusal" in the computer software. They placed 39 non-ADA trip requests on standby. These were requests for trips that were outside of the ADA service area and/or were at a time when fixed route service was not offered at the origin and/or destination.

Based on review team observations, the schedulers and dispatchers are properly trained to assist and treat individuals with disabilities with respect.

The review team also evaluated the First Transit and Transit Team drivers' training programs and curricula, which provide sufficient information and practice to train drivers to operate vehicles and equipment safely and assist and treat individuals with disabilities with respect. During the interviews with the review team, drivers said that they received enough training to carry out their jobs properly. Both First Transit and Transit Team have refresher training for drivers. Both have trainers and supervisors observe drivers while they are on the road.

Advisory Comment: The review team observed that reservationists were not consistent in confirming the following key information at the end of telephone calls: pickup times (most stated the negotiated time rather than the pickup window), use of special equipment, need for a PCA or companion, and fare (which can be peak or non-peak). An effective practice is to confirm all pertinent information at the end of each telephone call and to use a script for all reservationists that includes the following confirmation details:

- Rider contact information
- Date and time (use pickup windows rather than specific times)
- Pickup address
- Traveling with a PCA and/or companion(s)
- Special equipment the rider will use
- Drop-off address
- Fare

The review team identified some paratransit software parameters that merit Met Council's attention as potential contributors to the poor pickup and drop-off performance discussed in this report. For example, the setting for average road speed was 25 miles per hour, which in FTA's experience is higher than the setting other urban transit agencies use. Second, the maximum on-board ride time (trip length) was set to 90 minutes, regardless of distance traveled. This setting alone can create very early pickups and drop-offs and turn relatively short trips into excessively long trips. An effective practice for service providers is to review the software parameters and adjust them accordingly.

5.12 Service Under Contract with a Private Entity

Requirement: Under 49 CFR § 37.23, transit agencies must ensure that any private entity with which it has entered into a contract or other arrangement to provide complementary paratransit service meets all the obligations of the DOT ADA regulations, including those for service provision and vehicle acquisition, that the transit agency would be required to meet, if it provided the service directly.

Transit agencies must have policies and procedures in place to monitor contractors' performance and ensure that contractors meet the requirements. Transit agencies are not permitted to neglect monitoring or to limit their monitoring to the terms and conditions of contract or other arrangements with the private entity or entities.

Discussion: During this compliance review, deficiencies were found with how Met Council monitors its contracted service providers (First Transit, Transit Team, DARTS, and Taxi Services), with respective report sections noted as follows:

- Met Council is unable to measure Taxi Services' on-time performance. (See untimely pickups in Section 5.5 above.)
- Met Council's telephone hold-time performance standard is incorrect, which prevents them from properly monitoring private contractors (See telephone hold times in Section 5.5 above.)
- Met Council is unable to measure Taxi Services' drop-off performance. (See untimely drop-offs in Section 5.5 above.)
- Met Council does not monitor how its contractors code no-shows. (See discussion of no-shows in Section 5.8.)

Corrective Action Schedule: Within 60 days of the issuance of the final report, Met Council must begin monitoring and measuring on-time pickup performance for trips Taxi Services, Inc. provides.

Met Council must modify its telephone hold-time performance standard and must require its service providers to report telephone hold times.

Met Council must regularly monitor each service providers' drop-off performance.

Met Council must regularly review the trip requests that its contractors classify as no-shows to ensure they are properly distinguishing between rider no-shows and missed trips.

5.13 Service Provided by Another Public Entity

Requirement: 49 CFR Part 37 applies to any public entity that provides designated public transportation or intercity or commuter rail transportation. Under 49 CFR § 37.21(b), for entities receiving Federal financial assistance from the Department of Transportation, compliance with the applicable requirements of 49 CFR Part 37 is a condition of § 504 of the Rehabilitation Act of 1973 and of receiving financial assistance. Where a transit agency relies on another public entity to provide complementary paratransit service on its behalf, the transit agency remains responsible for meeting the requirements of 49 CFR Part 37. In other words, a transit agency must ensure that the service provided on its behalf meets all of the requirements that the transit agency would be required to meet, if the transit agency provided the service directly.

Transit agencies must have policies and procedures in place to monitor the performance of such service to ensure that these requirements are met; transit agencies are not permitted to defer to the public entity operating the service.

Discussion: During this compliance review, deficiencies were found with how Met Council's monitors public entities that provide Metro Mobility service, with respective report sections noted as follows:

- Met Council cannot monitor real-time operations data for trips Scott County provides. Furthermore, Scott County does not report its on-time performance to Met Council (See untimely pickups in Section 5.5 above.)
- Met Council's telephone hold-time performance standard is incorrect, which prevents them from properly monitoring public service providers. (See telephone hold times in Section 5.5 above.)
- Met Council is unable to measure Scott County's drop-off performance. (See untimely drop-offs in Section 5.5 above.)
- Met Council does not monitor how its service providers code no-shows. (See discussion of no-shows in Section 5.8.)

Corrective Action Schedule: Within 60 days of the issuance of the final report, Met Council must begin receiving and reviewing performance information from Scott County, including on-time performance (pickup and drop-off), long trip analysis, and telephone hold-time performance.

Met Council must modify its telephone hold-time performance standard and must require its service providers to report telephone hold times.

Met Council must regularly monitor each service providers' drop-off performance.

Met Council must begin to review the trip requests that its service providers are classifying as no-shows to ensure they are properly distinguishing between rider no-shows and missed trips.

5.14 Coordination of Service

Requirement: Under 49 CFR § 37.139(g), public transit operators were required to address efforts to coordinate service with other fixed route operators with overlapping or contiguous service areas or jurisdictions when developing their complementary paratransit plans. Coordination is an ongoing process; while these efforts are likely to have evolved over time, it is expected that such transit agencies will have a mechanism in place to ensure that complementary paratransit riders have an ability to make interjurisdictional trips on a comparable basis to individuals using the fixed route system.

Discussion: During this compliance review, no deficiencies were found with how Met Council coordinates service with other fixed route operators with overlapping or contiguous service areas. No other fixed route transit system's complementary paratransit service area overlaps with or is contiguous to Met Council's complementary paratransit service area. Therefore, Met Council has no such coordination obligations.

Summary Table of Compliance Review Findings

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days
1	Comparable complementary paratransit service	37.121	No deficiencies		
2	Absence of administrative burden	37.125 & 37.5	No deficiencies		
3	ADA paratransit eligibility standards	37.123(e) (1)-(3)	No deficiencies 2 advisory comments		
4	Accessible information	37.125(b)	No deficiencies		
5	Eligibility determinations within 21 days	37.125(c)	1 deficiency 1 advisory comment	Met Council does not communicate availability of presumptive eligibility to applicants	60 days of issuance of Final Report
6	Written eligibility determinations including specific reasons for denials or temporary or conditional	37.125(d)(e)	1 deficiency	Met Council's determination letters for individuals granted conditional or temporarily eligibility do not inform applicants of their right to appeal the decision	60 days of issuance of Final Report
7	Recertification of eligibility at reasonable intervals	35.125(f)	No deficiencies		

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days
8	Administrative appeals process for denials and conditional eligibility	37.125(g)	3 deficiencies	<p>Met Council requires individuals requesting appeals to submit written statements with reasons they feel they are eligible for Metro Mobility service (a prohibited practice)</p> <p>Met Council does not have the required separation of functions when conducting in-person assessments as an interim step prior to an appeal hearing</p> <p>Met Council's letters explaining its appeal decisions do not contain specific reasons for denying appeals</p>	60 days of issuance of Final Report
9	Complementary paratransit for visitors	37.127	2 deficiencies	<p>For visitors without certification from another transit system whose disability is apparent, Met Council incorrectly requires documentation</p> <p>Met Council requires documentation for ADA paratransit eligible visitors from their home transit agency rather than from visitors themselves</p>	60 days of issuance of Final Report
10	Types of service	37.129	No deficiencies		
11	Service area	37.131(a)	No deficiencies		
12	Response time	37.131(b)	1 deficiency	Weekend and holiday reservations hours in Scott, Anoka, and Dakota Counties end one hour before Metro Mobility's normal business hours	60 days of issuance of Final Report

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days
13	Fares	37.131(c)	1 deficiency	Fares for Metro Mobility service for trips in Metro Transit's reduced or free fare zones exceed twice the fixed route fare	60 days of issuance of Final Report
14	No trip purpose restrictions	37.131(d)	No deficiencies		
15	Hours and days of service	37.131(e)	No deficiencies		
16	Absence of capacity constraints	37.131(f)	(See items 17-22 below)		
17	No restrictions on the number of trips provided to an individual	37.131(f)(1)	No deficiencies		
18	No waiting list for access to the service	37.131(f)(2)	No deficiencies		
19	No substantial numbers of significantly untimely pickups for initial or return trips	37.131(f)(3)(i)(a)	No deficiencies 1 advisory comment		
20	No substantial numbers of trip denials or missed trips	37.131(f)(3)(i)(b) 37.131(3)(1)(b)	No deficiencies		

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days
21	No substantial numbers of trips with excessive trip lengths	37.131(f) (3)(i)(c)	2 deficiencies	Met Council's long-trip standard (90 minutes) fails to consider comparability with fixed route trips Metro Mobility's agency trips reveal the pattern of excessively long trips for particular riders	60 days of issuance of Final Report
22a	No operational patterns or practices significantly limiting service availability (telephone hold times)	37.131(f)	3 deficiencies	Met Council's telephone performance led to long telephone hold times Met Council's standard for acceptable telephone hold times improperly considers average daily hold times rather than the proportion of peak hold times longer than a stated amount Rider interviews reported occasional busy signals, likely due to insufficient system capacity, which Met Council confirmed	60 days of issuance of Final Report
22b	No operational patterns or practices significantly limiting service availability (untimely drop-offs)	37.131(f)	2 deficiencies	Drop-off performance for the sample week was approximately 87 percent on time and 13 percent late. Met Council's three largest service providers did not meet the on-time drop-off performance standard. In addition, 3.7 percent of the sample trips had drop-offs more than 60 minutes early (very early drop-offs) The sample data contained many trips without appointment times, implying that service providers omitted this information from the paratransit software. The lack of drop-off times can prevent dispatchers and drivers from meeting riders' drop-off needs	60 days of issuance of Final Report
23	Subscription Service	37.133	1 deficiency	Due to the presence of capacity constraints, subscription service cannot exceed more the 50 percent of all service during the hours when capacity constraints exist	60 days of issuance of Final Report

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days
24	No-show, late cancel and reasonable service suspension & appeal policies	37.125(h) (1)-(3)	5 deficiencies 1 advisory comment	<p>Met Council improperly designates as no-shows riders who cannot pay the fare or present proper identification</p> <p>Met Council's no-show warning and suspension letters do not inform riders that they can dispute no-shows they believe were outside of their control</p> <p>Met Council's no-show suspension policy does not consider the percentage of no-shows relative to the rider's frequency of travel</p> <p>Met Council's no-show suspension appeal process does not provide appropriate separate of functions between those initially proposing suspensions and those deciding appeals. In addition, the revised process does not permit appellants to present their cases to the Appeal Panel</p> <p>Met Council improperly cancels return trips if riders are no-shows for outgoing trips</p>	60 days of issuance of Final Report
25	Complaint Resolution & Compliance Information	27.13(b) & 27.121	1 advisory comment		
26	Non-discrimination	37.5	2 deficiencies	<p>Met Council's requirement that Metro Mobility riders under age six travel with PCAs discriminates against individuals with disabilities because Met Council does not require Metro Transit riders under age six to travel with PCAs</p> <p>Met Council permits its service providers to leave riders unattended when transferring them from one provider to another; for riders who cannot be left unattended, this policy improperly requires them to travel with an attendant, a discriminatory practice</p>	60 days of issuance of Final Report

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days
27	Training	37.173	No deficiencies 1 advisory comment		
28	Service under contract with a private entity	37.23	4 deficiencies	<p>Met Council does not obtain data from Taxi Services, Inc. that would allow analysis of on-time pickup performance, on-time drop-off performance, and trip lengths</p> <p>Met Council does not collect or review data regarding the distribution of telephone hold times</p> <p>Met Council does not monitor contractors' drop-off performance</p> <p>Met Council does not monitor how its contractors code no-shows</p>	60 days of issuance of Final Report
29	Service provided by another public entity	37.21(b)	4 deficiencies	<p>Met Council does not have an electronic link to Scott County's software and thus cannot monitor on-time performance for trips Scott County provides</p> <p>Met Council does not collect or review data regarding the distribution of telephone hold times</p> <p>Met Council does not monitor service providers' drop-off performance</p> <p>Met Council does not monitor how its service providers code no-shows</p>	60 days of issuance of Final Report
30	Coordination of service	37.139(g)	No deficiencies		

Attachment A
FTA Notification Letter to Met Council



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

Headquarters

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

AUG 08 2013

Susan Haigh, Chair
Metropolitan Council
390 North Robert Street
St. Paul, MN 55101

Dear Ms. Haigh:

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, 38 and 39 as they apply to public transportation. As part of its ongoing oversight efforts, FTA through its Office of Civil Rights conducts a number of on-site ADA compliance reviews of grant recipients. This letter serves as official notification that Metropolitan Council has been selected for a review of Metro Mobility ADA complementary paratransit service to take place during the week of September 30, 2013.

The purpose of this review will be to determine whether Metropolitan Council is meeting its obligations to provide ADA paratransit service as a complement to fixed route in accordance with the service criteria and eligibility requirements contained in Subpart F of 49 CFR Part 37, and other related requirements contained in 49 CFR Parts 27, 37 and 38.

The review process includes data collection prior to the site visit, an opening conference, an on-site analysis of Metro Mobility complementary paratransit service, and an exit conference. The entire on-site portion of the review will be completed within five days. FTA has engaged the services of the Collaborative, Inc. (the Collaborative), of Boston, MA, to conduct this compliance review. The Collaborative team and FTA representatives will participate in the opening and exit conferences.

We request an opening conference at **9 a.m. on Monday, September 30, 2013** to introduce the review team members to Metropolitan Council, including you or your designee, the paratransit service manager, the ADA coordinator, and other key staff. During the opening conference, the review team members will present an overview of the on-site activities.

Because review team members will spend considerable time on site during the week, please provide them with temporary identification and a workspace within or near the Metro Mobility offices for the duration of the visit. Ms. Kathleen Shea, Director of Program Evaluation and Audit has informed us that she will serve as Metropolitan Council's liaison with the review team and will coordinate the on-site review and address questions that may arise during the visit.

So that we may properly prepare for the on-site visit, please provide the information described in the two attached enclosures. Enclosure 1 lists items that must be received within 21 calendar days of the date of this letter. These materials should be forwarded to:

David Chia
the Collaborative, Inc.
122 South Street
Boston, MA 02111
617-338-0018, x17
dchia@thcollaborative.com

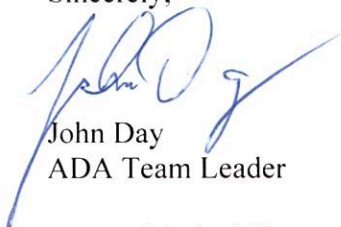
Enclosure 2 consists of items that the review team members will analyze on site on September 30, 2013, after the opening conference.

We request **2 p.m. on Friday, October 4, 2013**, for the exit conference to afford an opportunity for the reviewers to discuss their observations with you and your agency. We request that you or your designee, the Metro Mobility paratransit service manager, the ADA coordinator, and other key staff attend the exit conference. The FTA Office of Civil Rights will make findings at a later date and will provide a *Draft Report*. Metropolitan Council will have an opportunity to comment before FTA finalizes the report. The *Draft Report*, when issued to the Metropolitan Council, will be considered a public document subject to release under the Freedom of Information Act, upon request.

Metropolitan Council, Metro Transit and Metro Mobility representatives are welcome to accompany the review team during the on-site activities, if you choose. If you have any questions or concerns prior to the opening conference, please contact Susan Clark, Program Manager for this compliance review, at 202-493-0511 or at her e-mail address: sue.clark@dot.gov

Thank you in advance for your assistance and cooperation as we undertake this process. We look forward to working with Metropolitan Council, Metro Transit, Metropolitan Transportation Services and Metro Mobility staff.

Sincerely,



John Day
ADA Team Leader

cc: Marisol Simon, FTA Region V Administrator
Marjorie Espina, FTA Region V Civil Rights Officer
Patrick Born, Regional Administrator, Metropolitan Council
Kathleen Shea, Director of Program Evaluation and Audit, Metropolitan Council
Brian Lamb, General Manager, Metro Transit
Arlene McCarthy, Director, Metropolitan Transportation Services (MTS)
Gerri Sutton, Assistant Director, Metropolitan Transportation Services (MTS)
Susan Clark, FTA Equal Opportunity Specialist

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

1. A description of how ADA complementary paratransit service is structured and provided, including:
 - How trip requests/reservations are handled (by a central reservation office or by each carrier), and the address(es) where reservations are taken
 - How trips are scheduled (by a central scheduling office or by each carrier) and the address(es) where scheduling is done
 - How dispatching is handled (centrally or by each carrier) and the address of the central dispatch office or the carrier dispatch sites)Review team members may contact you prior to the visit to discuss this information.
2. One copy of current carrier contract(s) with private operators, public entities and counties that provide ADA paratransit service on behalf of the entities responsible for fixed route services
3. A copy of the complementary paratransit "Operator Manual" for each carrier or contractor (if each uses its own), and copies of the "Rider Handbook," service brochure, or other document(s) for eligible riders and the public explaining service provision and how to request trips
4. A description of the complementary paratransit service standards, including:
 - The on-time performance standards (how "on-time" is defined and the percentage goal for trips to be provided within the standards)
 - The standards that have been set regarding acceptable numbers or percentages of ADA trip denials
 - Travel time standards, including maximum travel time (if applicable). What travel time is considered comparable to fixed route and what travel time is considered too long? What are the percentage goals for trips to be provided within the standards?
5. Performance standards for hold time (and/or call pickup) and abandoned calls to reservations and dispatch. What are the standards and percentage goals of calls to be handled within these standards?
6. Samples of driver manifests (described in Item #1 of Enclosure 2 attached) and samples of records, reports or tabulations of the ADA complementary paratransit information (described in Item #2 of Enclosure 2 attached)
7. Capital and operating budget and expenditures for complementary paratransit service for the four most recent fiscal years, including the current fiscal year
8. The number of ADA complementary paratransit trips scheduled and provided, and trips denied for the four most recent fiscal years, including the current fiscal year
9. Three copies of the fixed route system map

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
 - Passenger no-shows
 - Carrier missed trips
 - Trips provided
 - An itemization of trips requested, scheduled, and provided by carrier / contractor
 - A list of ADA trips denied each month showing customer's name, origin, requested destination, day and time, and if the person was ambulatory or used a wheelchair
 - On-time performance information (by carrier)
 - A list of ADA trips over 60 minutes in length, including the customer's name, trip origin, trip destination, date, day and time, total on-board time and whether the customer was ambulatory or used a wheelchair.
 - A list of passenger no-shows and carrier missed trips for the last month including the negotiated pickup time and the actual vehicle arrival and departure times
 - Telephone call management records (if available) showing hold times by hour or half-hour periods and day, total call volume, calls answered and abandoned
3. A list of complaints filed in the past year related to or alleging capacity constraints in ADA complementary paratransit service. The list should include all complaints related to ADA trip denials, missed trips, wait lists, trip caps, trip restrictions or limits, on-time performance, lengthy trips, phone capacity issues, etc. The list should include the customer's name, trip origin, date and type of complaint, carrier, and the agency's resolution, including any corrective actions requested and taken.
4. The following ADA paratransit eligibility information:
 - A blank ADA eligibility application form
 - Copies of eligibility guidelines and policies and any assessment or interview forms
 - Samples of all types of determination letters (unconditional, conditional, temporary, trip eligible (if applicable) and denial letters
 - Other letters related to receipt of applications, incomplete applications, eligibility appeals and other eligibility issues
 - Total number of ADA paratransit eligible individuals
 - For the most recent 12 months:
 - Number of applications received
 - Number of completed applications considered and processed
 - Number of applications determined incomplete
 - Number of people determined unconditional eligible
 - Number of people determined conditionally eligible
 - Number of people determined temporarily eligible
 - Number of people determined ineligible
 - Documentation, policies, procedures and correspondence related to service suspensions for

passenger no-shows

- Access to eligibility files and appeal records, and no-show/suspension files and appeal records
5. Work shift assignments for reservationists, schedulers, dispatchers, and drivers
 6. Access to personnel records showing hire and termination dates for reservationists, schedulers, dispatchers, drivers, and road supervisors
 7. A current complementary paratransit fleet roster with vehicle type, make and model year (designating whether the vehicles are accessible or inaccessible) and odometer reading and numbers of accessible and inaccessible spares. For each accessible vehicle, please include the design load of the lift or ramp
 8. Run structure for each ADA paratransit contractor listing the number of vehicles in service (by hour) for a recent week
 9. ADA subscription trips provided by each ADA paratransit (by hour) for a recent week (if applicable)
 10. Training curricula for each category of ADA complementary paratransit employees and contractors (e.g. reservationists, drivers, dispatchers, schedulers)
 11. Procedures for providing information and communications capacity through accessible formats and technology
 12. Access to the most recent six months of daily vehicle pullout records showing late pullouts and closed runs
 13. Vehicle availability reports for the most recent six months
 14. Copies of vehicle pre-trip inspection and preventative maintenance form(s)
 15. Assistance with viewing and capturing parameters used in the scheduling software
 16. Assistance with viewing and collecting data on vehicle run structures and peak pullout requirements

Attachment B
Met Council Response to Draft Report

Upon reviewing the Metropolitan Council Paratransit Compliance Review Draft Report dated January 30th, 2014 Metropolitan Council staff have several questions, comments, and corrections. Because the audit happened at a unique time during the government shutdown there are several unexpected deficiencies listed. Metropolitan Council staff did not have the opportunity or advantage of interacting directly with FTA Civil Rights Office Staff during the review. Therefore, we would like to set a conference or video conference up with your staff at your earliest convenience in the next two weeks to discuss the items listed below.

Issues for discussion / clarification

1. Compliance issues with Taxi Services

The Metropolitan Council contracts with Taxi Services Inc. to provide “non-ADA” rides for our customers under both the Premium Same Day Program and the Peak Demand Overflow program. Both programs are designed for Non-ADA Rides only.

Only rides which are outside of the ADA Service area are allowed to be placed onto the PDO service. This has been the Metro Mobility policy since the beginning of the program. Through the audit, it was discovered that a few ADA rides were erroneously placed onto taxi service. Since the audit Metro Mobility revised its communication to contractors to underscore the importance of placing only non-ADA rides onto PDO taxi services. If an ADA ride is erroneously placed on PDO it will be considered a “Denial of Service” and a violation of the riders Civil Rights. As a result the provider will be fined \$500 to \$2,000 per trip for an ADA denial under the terms of the contract.

In September 2013, ten ADA Trips were mistakenly placed on PDO. In October the same provider mistakenly placed four ADA trips on PDO taxi service for which the provider was fined. The Metro Mobility service center created a report to flag any ADA trips that are erroneously placed onto PDO taxi so that the ride can be appropriately moved back to Metro Mobility in advance of the service day. In January 2014 there were zero ADA trips placed on PDO. Metro Mobility Staff will continue to monitor and address every ADA Trip placed on PDO accordingly.

PDO and PSD Taxi Services are established for Non-ADA trips. It is our position that any discussion about non-ADA service is outside of the scope of this audit. The Metropolitan Council respectfully requests that all references for the deficiencies pertaining to taxi service be removed from the contract including:

- a. All deficiencies noted in Section 5.12 “Service under contract with a private entity” on pages 44 and 45.

- b. Language in Section 5.6, Absence of Capacity Constraints on page 30. *“An advisory comment is made regarding electronic recordkeeping for taxi subcontractors.”* Also in the same section the following language should be stricken from the report. *“Met Council was unable to provide the review team with data demonstrating that its taxi contractor (Taxi Services, Inc.) is providing complementary paratransit service with timely pickups for the trips it provides. (See Section **Error! Reference source not found.** for a discussion of deficiencies with respect to monitoring service that private entities provide under contract.)”*

2. No Show Policy

a. FTA Requirement for percentage of trips

The Metropolitan Council respectfully requests a discussion about the requirement that a “No Show determination” include the number of trips that a person scheduled. Each passenger no show carries a considerable expense to the tax payers of the State of Minnesota and negatively impacts the Civil Rights of other passengers. The current Metro Mobility policy of four No Shows within a 30-day period balances both fairness for the rider and accountability to the tax payer. Four No Shows in a 30 day period represents 10% of the trips which would be taken in a four week period by a passenger traveling 2 times per day (for example to a work appointment.) The average system No Show percentage is just under 2%. The reviewers suggested that a reasonable policy of “excessive” No-shows would be double the average. Therefore, IF the Council were to adopt a 4% no-show threshold as suggested, there would be virtually no change as to which riders are impacted by the No-show policy. The current Metro Mobility No Show Policy is easy to communicate, understand, and administer without an undue negative impact on the customer.

b. The Metropolitan Council does not “separate functions correctly.”

In Section 5.8 on page 44 the report states, *“Met Council’s appeal process does not correctly separate functions since the CSS reviewing the appeal is the same person proposing the suspension.”* The Metropolitan Council respectfully disagrees with this conclusion. The Customer Service Specialist reviewing No Shows is not hearing “Appeals” from customer on the legitimacy of the No Show Suspension. The CSS is reviewing individual No Shows with the customer to determine if there was an error by the contractor. The first “level” of an appeal rests with the Customer Service Manager. The Customer Service Manager has access to call recordings, and additional information which is not readily available to front line staff. This separation of functions and responsibility within the Metro Mobility program is both expedient and appropriate.

If a two-step appeal process is implemented, can the Manager of Customer Service conduct step one (initial review) before forwarding an appeal to the panel? The MMSC feels that customer’s benefit by having MMSC staff involved in the appeal process due to staff’s thorough knowledge of policy and access to phone recordings and manifest data. Because staff review can be quick and is not subject to coordination of various

schedules it allows faulty no-shows and late cancels to be exposed and removed more quickly than would be necessary if all appeals went directly to the panel.

c. The Customer does not have the right to an appeal hearing

The statement in section 5.8 on page 40 which states *“The fourth level of appeal, while an appropriate separation of functions, does not allow suspended riders to present their case at an Appeal Panel hearing”* is incorrect. All customers have the opportunity to appeal directly to the appeals panel.

d. No Shows suspensions are not appropriate length

In Section 5.8 on page 41 the report states that the *“Met Council must...establish suspension periods of reasonable length.”* The Metropolitan Council believes that it has already established a No Show policy which seeks to balance the rights of the rider, the rights of other riders and the rights of the tax payer. The current graduated No Show Policy which includes both *“Second Chances”* and *“Suspension Reductions”* is fair and reasonable. We respectfully request that FTA staff demonstrate which portion of the Met Council procedure is *“unreasonable.”*

3. Excessive Trip Lengths

The Metropolitan Council requests clarification and guidance regarding *“excessive trip lengths”* and *“comparable”* as defined within section 5.6 *“Absence of Capacity Constraints.”* On page 32 the report states, *“FTA recommends basing complementary paratransit travel time on the comparable fixed route travel time, **plus 20–30 minutes** to allow for a reasonable estimate of time spent walking to and from a bus stop, waiting for the bus to arrive, and making any necessary transfers from one vehicle to another.”* However, throughout the remainder of the document 20 minutes is used for the analysis.

- a. Does the FTA consider 20 or 30 minutes *“reasonable”* relative the fixed route? What do the numbers look like if the analysis is based on 30 minutes instead of 20?
- b. If 30 minutes of additional *“travel”* or walking time are considered *“comparable”* should all Metro Mobility trips 30 to 40 minutes or less be excluded from any comparability analysis?
- c. At what point would the FTA say that trips which cannot be *“reasonably”* completed on local fixed route transit be excluded? For example, is 3 hours on a local fixed route excessively long and should it therefore be excluded?
- d. Can the FTA provide guidance on industry best practices for how other transit agencies are analyzing and identifying comparability?
- e. Does the FTA recognize that this relatively restrictive additional time (20-30 minutes) has the potential to significantly limit an agency’s ability to create efficiencies through a shared ride system?

4. Drop off Performance Requirements.

In Section 5.6 Absence of Capacity Constraints on page 36 the report states, *“Met Council does not regularly obtain drop-off performance data from its service providers. (Sections **Error! Reference source not found.** and **Error! Reference source not found.** discuss the respective requirements for Met Council to monitor its private and public service providers’ drop-off performance.)”* This should be stricken from the report. The Metropolitan Council monitors the drop off performance of the contractors on a monthly basis. The “Performance Credit” section of the contract lists “Appointment Time” as contract criteria with damages assigned to the contractors for failing to meet the performance standard.

5. Subscription Service

Section 5.7 of the report notes on page 38 that *“because this review identifies capacity constraints in Metro Mobility service, a pattern of excessively long trips for certain riders, limitations on telephone access, and untimely drop-offs, Met Council must ensure that subscription service does not exceed more than 50 percent of all service during the hours capacity constraints occur.”*

The Metropolitan Council respectfully disagrees with this assessment. First, subscription service does not contribute to excessive telephone hold times noted in this report. On the contrary reducing the number of subscriptions would increase possible telephone hold times. Second, there is no indication that the excessive ride times are occurring during the early morning hours when the Consultants noted a greater than 50% subscription rate. Third, there is no analysis showing that the appointment times are negatively impacted at the hours in which there is a greater than 50% subscription rate.

Further, the Metropolitan Council would like to seek clarification on this requirement. The Council believes that it is inappropriate to look at the percent of standing order rides as a system-wide calculation. Each of our contracts has dedicated fleet, separate reservationists and serves specific customers. The Council has always held each contract to the 50% threshold and we believe this to be correct approach since they operate independently of each other. Requiring one provider to reduce the number of subscription trips at a given time because of another provider’s capacity constraints not only fails to address the existing constraints, but may create new ones by increasing call volume and reducing routing efficiency.

6. Potential to appeal “Temporary and conditional eligibility”

In Section 5.3 Paratransit Eligibility Standards, on page 20 the report notes *“During this compliance review, deficiencies were found with the requirement to inform individuals determined to be conditionally or temporarily eligibility of their right to appeal the decision.”* We would like the language to reflect that the Metropolitan Council does not enforce conditional eligibility so this “deficiency” currently has no impact to the consumer.

7. Administrative Appeals determining eligibility

The Metropolitan Council is seeking clarification. Is adequate separation of function achieved by having the ADA Paratransit Evaluator's manager conduct interim assessments prior to appeal in cases where an applicant has been denied based exclusively on the paper application? The Metro Mobility Service Center feels that interim assessments are an important tool for customer service, as they allow for expedited resolution of cases where applicants are denied based in inaccurate or incomplete information presented in written applications.

8. Complementary Paratransit for Visitors

The Metropolitan Council is seeking clarification. Is it considered noncompliant to require a visitor who claims to have an apparent disability that prevents them from accessing fixed-route transit to put that claim in writing and send it to the MMSC? Must the MMSC accept a verbal claim of "apparent" disability when talking to a visitor over the phone?

9. Operational Patterns or Practices Limiting the Availability of Service to ADA Paratransit Eligible Individuals

The Council respectfully requests that deficiencies listed in 22a of the "Summary Table of Compliance Review Findings" be removed. The intent of 49 CFR 31.131 is to ensure that customers are not denied rides. The Council understands that excessively poor on-time performance and long ride times shall be considered a constrained system and the equivalent of denied rides as pointed out in the language.

49 CFR paragraph 37.131 (f) restricts "any operational pattern or practice that significantly limits the availability of service". The language does not discuss call hold times and to conclude that intermittent hold times "in excess of two minutes" significantly interferes with a rider's ability to secure a ride is not reasonable. The Council believes that only chronic and sustained difficulties hold times and busy signals "significantly limits the availability of service" and would thereby constitute a denial. The Council does not have chronic and sustained difficulties with riders accessing a reservationist to place their ride.

The Council acknowledges that the phone hold times are unacceptable at times from a quality experience perspective and is working to resolve the issue through additional phone lines, additional staffing and an IVR system that will allow callers access to ride information and automatically distribute imminent arrival notifications. These changes are expected to alleviate any recurring issues with long telephone hold times.

10. Fares exceed more than twice the fixed route fare

In the report it is noted that the "Met Council must revise its Metro Mobility fares to not exceed twice the fares for all comparable fixed route trips in the service area, including trips with origins and destinations within its reduced-fare and free-zone."

First it should be noted that the Council does not have a “free zone.” Metro Transit operates limited “Fee Buses” along a 12 block stretch of one north/south Nicollet Mall corridor from approximately 6:00 am to 1:00 am. This route does not enable customers to “transfer” free of charge to other routes serving the remaining downtown area.

Traditionally the FTA has interpreted the area around a fixed route for terms of ADA paratransit service to be $\frac{1}{4}$'s of a mile. This would encompass essentially the entire downtown fare zone. It would also make it possible for paratransit customers to take trips which are perpendicular rather than parallel the north/south Nicollet Corridor. Therefore the Met Council respectfully requests that for purposes of determining comparability that only trips within $\frac{1}{4}$ of a mile either side of the Nicollet Mall corridor is consider as being within the “Free Zone.”

Attachment C
Eligibility Application

Application / Recertification

Questions about this form?

Call Metro Mobility Customer Service at (651) 602-1111 voice, (651) 221-9886 TTY.

Mail applications to: **Metro Mobility Service Center**

390 N. Robert Street, St. Paul, MN 55101-1805

We do not accept
applications by fax

Complete all parts of the application form. Applications that are not fully completed will be returned, which will delay your eligibility determination.

This application and future written information are available in large print. Does large print better suit your needs? ☐ Yes ☐ No

Please print or type

PART A **Applicant data**

Name: _____
First Middle Initial Last

Street Address: _____ Apt.#: _____

City: _____ Zip Code: _____

Day Telephone: (_____) _____ Evening Telephone: (_____) _____

Birth Date: ____/____/____

Do you have a Minnesota state ID card or Minnesota driver's license? ☐ Yes ☐ No

ID # _____ License # _____ Expiration Year: _____

Mailing Address *(if different from above)*

Street Address: _____ Apt.#: _____

City: _____ Zip Code: _____

Email Address: _____

Emergency Contact Person

Name: _____
First Middle Initial Last

Day Telephone: (_____) _____ Evening Telephone: (_____) _____

1. Which of the following mobility/communication aids do you use? (Please check all that apply.)

- | | | | |
|---|---|--|---|
| <input type="checkbox"/> Cane | <input type="checkbox"/> Manual Wheelchair | <input type="checkbox"/> Service Animal | <input type="checkbox"/> Transfer Board |
| <input type="checkbox"/> White Cane | <input type="checkbox"/> Powered Wheelchair | <input type="checkbox"/> Communication Aid | <input type="checkbox"/> Prosthesis |
| <input type="checkbox"/> Walker | <input type="checkbox"/> Powered Scooter/Cart | <input type="checkbox"/> Portable Oxygen | <input type="checkbox"/> None of These |
| <input type="checkbox"/> Crutches | <input type="checkbox"/> Boarding Chair | | |
| <input type="checkbox"/> Other (please describe): _____ | | | |

If you selected Wheelchair or Scooter, would you prefer/need to use the device while riding in Metro Mobility Vehicles? ☐ Yes ☐ No ☐ Sometimes

2. Are you able to travel in an automobile? ☐ Yes ☐ No

3. If you use a wheelchair or scooter:

Is it more than 30 inches wide? ☐ Yes ☐ No

Is it more than 48 inches long? ☐ Yes ☐ No

Is the combined weight of device and occupant more than 600 pounds? ☐ Yes ☐ No

Travel training is an individualized program designed to teach people with disabilities how to use bus/rail transportation. The Metropolitan Council offers this service at no cost.

If you are interested in learning more about our Travel Training Program please call Metro Mobility Customer Service at 651-602-1662.

4. Does your health condition/disability require you to use paratransit service:

☐ Seasonally (Nov. - Apr.)

☐ Until I successfully complete travel training

☐ Permanently ☐ Temporarily

If temporarily, for how long? _____ Week(s) _____ Month(s)

5. Does your health condition/disability change from day to day in ways that occasionally disrupts your ability to use regular-route bus service? ☐ Yes ☐ No

If yes, please explain: _____

6. When using paratransit service, does your health condition/disability require you to travel with a personal care attendant (PCA)*? ☐ Yes ☐ No

* A PCA is a person traveling as an aide who is designated or employed by a person with disabilities to help that person meet his or her personal needs and/or facilitate travel.

PART B

Questions about using regular-route public transit

Complete Part B even if you are unable to use regular-route transit. This information will assist us in determining how your disability/health condition affects your ability to use regular-route bus service.

7. Do you now independently use regular-route buses? ☐ Yes ☐ No ☐ Sometimes

If "Yes" or "Sometimes," how often? _____ Week(s) _____ Month(s) _____ Year(s)

Which of the following best describes how you use regular-route buses?

- ☐ To travel to and from one destination only
- ☐ To travel to and from a few destinations
- ☐ To travel to and from many different destinations

Explain what prevents you from independently using public transit services.

8. Have you ever had training to use the regular-route buses? ☐ Yes ☐ No

If "No," would you like to receive free training on how to use the Metro Transit bus or Light Rail system? ☐ Yes ☐ No

9. Using a mobility aid or on your own, how far are you able to travel without the assistance of another person? ☐ 3 blocks ☐ 6 blocks

☐ 9 blocks ☐ < 3 blocks

10. I can wait for a regular-route bus (check all that apply):

- ☐ Only if there is a bench or shelter
- ☐ No more than 15 minutes ☐ More than 15 minutes



11. Please check all the categories below as they relate to your ability to use regular-route buses:

I am:	Yes	No	Sometimes
A. Able to tolerate very hot or very cold weather.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B. Able to recognize destinations, bus stops, or landmarks.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C. Able to tolerate air pollution (smog, fumes, perfume).....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D. Free from night blindness.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
E. Able to recognize printed information.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
F. Able to hear and process spoken words or auditory information.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
G. Able to communicate needs.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
H. Able to follow directions.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I. Able to deal with unexpected situations or changes in routine (example: bus detours).....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
J. Able to safely and effectively travel through crowded and/or complex facilities.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
K. Able to recognize curbs and other drop-offs.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
L. Able to travel independently along sidewalks and other pedestrian ways.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M. Able to cross streets independently.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
N. Able to find the correct bus stop.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
O. Able to identify the correct bus.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
P. Able to safely enter/exit the bus (this includes stepping up three steps with maximum height of 16 inches).....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q. Able to get on and off a bus that has a lift platform (either standing or with mobility aid).....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
R. Able to deposit fare into the fare box or show bus pass.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
S. Able to get to a seat/wheelchair position and remain seated during a bus trip.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
T. Familiar with what to do if I miss my bus.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you checked "No" or "Sometimes" to any of the items in question 11, please explain:

Use the lines provided below if you require additional space

PART C

Applicant signature

The information provided on this form is private data and is used to determine ADA paratransit eligibility. The ability to determine your eligibility is based on receiving all of the information requested on this form. All medical or locational information pertaining to application for or users of ADA paratransit service is private, except the name of the applicant or user. Any other information cannot be released to anyone else, unless the applicant or user authorizes the release in writing. If you are determined ADA paratransit eligible, information about your eligibility status will be entered into a database maintained by the Minnesota Department of Public Safety, Driver and Vehicle Services Division, so a symbol can be produced on a Minnesota Driver's License or Minnesota ID Card which you will use as an identification card when using Metro Mobility services.

I certify that all information on this application form is accurate. **I understand that misinformation or misrepresentation of facts will be cause for disqualification or rejection of my ADA eligibility.** I also understand that additional information relating to my health condition or disability may be required to determine eligibility. This information may be obtained through an in-person assessment or by requesting information from a professional who understands my health condition or disability. Additional information will be required only when the information provided on the application form does not clearly determine ADA paratransit eligibility.

Applicant's Signature: _____ Date: _____

- ★ If the applicant is not his/her own guardian, the following information about the guardian is required:

Guardian's Name: _____
First Middle Initial Last

Day Phone: () _____

Guardian's Signature: _____ Date: _____

- ★ If someone other than the applicant or the applicant's guardian is preparing this form, please provide the following information about the preparer:

Name: (please print) _____
First Middle Initial Last

Day Phone: () _____

Preparer's Signature: _____ Date: _____

Metro Mobility Eligibility Application Professional Verification

SECTION A

This portion of your *Americans with Disabilities Act (ADA)* paratransit application requires information from a professional you identify as being familiar with your disability/health condition.

Here's what you need to do:

- 1. Complete and sign** the authorization form (*Section B*).
Keep Section A for your future reference.
- 2. Send** the completed authorization form (*Section B*) and the Professional Verification Form (*Section C*) **to the professional you have identified.**
- 3.** The professional will send Section B and Section C back to you.
- 4.** You need to *return the followings in the enclosed envelope.*
 - The ADA Paratransit Application/Recertification
 - Section B of this form
 - Section C of this form

Mail to: *Metro Mobility Service Center (MMSC),
390 N. Robert Street, St. Paul, MN 55101-1805*

Incomplete applications will be returned to you.

**How long does the application process take?**

Once all required information is received, you will be notified within 21 days regarding your eligibility status or if you need to participate in an in-person assessment.

There are several things that you can do to help speed up the process. Be sure you answered all questions on the application form, signed the application, and have included the application and Sections B & C.

Applications received that do not include all three (3) sections will be considered incomplete and will be returned to you. **Incomplete applications will be returned one (1) time. If the same incomplete packet is received again by the MMSC it will be discarded and applicants will need to start the process over.**

Who qualifies as a professional?

It is important that you select a professional who is familiar with your disability/health condition and your functional abilities and limitations. Make sure that your professional meets the criteria necessary in helping to determine your eligibility. The MMSC will accept information from one of the following professionals:

- physician or registered nurse
- licensed independent clinical social worker (LICSW)/licensed independent social worker (LISW)
- psychologist/psychiatrist
- occupational or physical therapist
- certified rehabilitation counselor
- certified orientation & mobility specialist
- certified recreational therapist
- speech language pathologist

Why is an Authorization Release form necessary?

An applicant's authorization is required before the professional can release information to the MMSC. The information is deemed private and is only used in assisting us in determining an applicant's ADA Paratransit eligibility.

If you need this form in an alternative format please call a customer service representative at **(651)602-1111, (651)221-9886 TTY.**



Instructions for the **Authorization**

1. **Complete and sign** the "*Authorization to Release Information*" (Section B).
Keep (Section A) for your future reference.
2. **Send** the completed *Authorization Form* (Section B) and the *Metro Mobility Professional Verification Form* (Section C) to your designated professional.
3. **Wait** for the professional to return *Sections B and C* to you. Check back with your professional if you don't receive your information.
4. **Put your application/recertification form and Sections B & C in the same envelope and mail to:** *Metro Mobility Service Center (MMSC), 390 N. Robert Street, St. Paul, MN 55101-1805* for processing.

SECTION B **Authorization to Release Information**

(when complete send to the professional you named)

Applicant's Name: _____

Date of Birth: ____/____/____

Applicant's Address: _____ Apt. #: _____

City: _____ State: _____ Zip Code: _____

Applicant's Telephone Number: (_____) _____

I authorize the following professional to release to the MMSC specific information as requested. It is my understanding that the information released will be used solely to determine my ADA paratransit eligibility. I understand that I may revoke this authorization at any time. Unless revoked, this form will allow that professional listed below to release information described for six months after the date appearing below.

Name of Professional: _____ Title: _____

Applicant's Signature: _____ Date: _____

Guardian's signature required if the applicant is not his/her own guardian,

Guardian's Signature: _____ Date: _____

SECTION C Metro Mobility Professional Verification Form

Dear Health Care Professional:

You are being asked to provide information regarding this individual's disability. The Federal Law is very specific about ADA para-transit eligibility. The law restricts eligibility to individuals who,

1. as a result of their disability, cannot board, ride, or disembark from a regular fixed route bus or light rail car or
2. have a specific impairment-related condition which prevents them from getting to or from a bus stop.

PLEASE NOTE: This **does not** include persons who find it **difficult** or **uncomfortable** to get to and from bus stops. *In providing information you should consider only the presence of a disability or health condition and not the applicant's age or economic status.*

This section must be filled out for all applicants

GENERAL INFORMATION

- Describe diagnosed disability you are currently treating this individual for: _____

- Date of onset ____/____/____
- Date of last visit ____/____/____
- How long have you worked with the individual? Since ____/____/____
- Is disability temporary____ or permanent____ ?
If permanent is disability progressive? Yes____ No____
If temporary please give best estimate of rate of recovery. <6 mos.____ >6mos.____ >1 year____
- Is therapy part of treatment? Yes____ No____ If yes, give brief description_____

- Do temperature extremes affect the individual?
(Ex. Heat index of >85 degrees or wind chill <10 degrees) Yes____ No____ If yes, how so?

- Please list all medications. _____

- Is this individual compliant with taking medications? Yes____ No____
- Does the individual currently uses regular route public transportation? Yes____ No____ Not Sure____
- Is the individual's judgment impaired? Yes____ No____
- Is behavioral inhibition impaired? Yes____ No____
- Can the individual walk? Yes____ No____
- Does the individual use a mobility aid? Yes____ No____ Please list _____

>>> Cont. to next page

This section must be filled out for all applicants

GENERAL INFORMATION *Cont'd*

- How long has individual been using the device(s)?

- How far can the individual walk? (With mobility aid if applicable)
3 blocks____ 6 blocks____ 9 blocks____ <3 blocks____
- With treatment/therapy will this distance increase? Yes____ No____
- Please indicate the expected distance after treatment/therapy:
3 blocks ____ 6 blocks____ 9 blocks____ <3 blocks____
- Give best estimate of length of time required to achieve this improvement.

Please complete only those sections that apply to this individual

NEUROLOGICAL IMPAIRMENT/HEAD INJURY

- Does the individual experience seizures? Yes____ No____ Date of last seizure ____/____/____
Please give no. of seizures____ and frequency____
- Is the individual's judgment impaired? Yes____ No____
- Is behavioral inhibition impaired? Yes____ No____
- Does judgment and inhibition impairment prevent the individual from independently traveling outside the home or immediate environment? Yes____ No____
- When traveling independently does the individual have the ability to:
(check all that apply)
Get help if lost____ Recognize & avoid danger____ Cross streets safely____
Follow written directions____ Communicate needs____ Process information____
Understand and follow schedule to get places on time____

VISUAL IMPAIRMENT * Fill in if applicable

- Please provide visual acuity measurements and visual field readings for both eyes.
* OS: _____ OD: _____
- Does the individual require any accommodations, adaptations, low vision aids, etc? Please list:

- How does the individual's visual impairment affect their ability to move about in the environment?

- Has the individual received any orientation & mobility (O&M) training? Yes____ No____

EMOTIONAL/BEHAVIOR ISSUES

- Does the individual experience any of the following:
auditory hallucinations____ visual hallucinations____ delusions____
- Does this prevent the individual from being oriented to person, place, and time? Yes____ No____
- Is the individual currently being treated for any of the following:
anxiety____ depression____ panic attacks____ schizophrenia____ other:_____
- For anxiety panic attacks please indicate on average the frequency and length of panic attacks.
per day____ per week____ per month____ per year____ approx. duration: _____
- What technique(s) and/or skills is the individual utilizing to assist in coping with the above issue(s)?
visualization____ relaxation techniques____ positive self-talk ____ aroma therapy____ other:_____
- Are these techniques effective in reducing symptoms? Yes____ No____

COGNITIVE/MENTAL IMPAIRMENTS

* Fill in if applicable

- Please describe the functional limitations caused by this impairment?

- Is the individual's judgment impaired? Yes____ No____

- If yes, please describe to what extent or give an example. _____

* Please list IQ score and GAF score if known. IQ = _____ GAF = _____

- Is the individual able to live independently? Yes____ No____

Additional Comments:

MMSC Staff will make the final determination of the applicant's eligibility

Doctor/Health Care Professional Signature: _____

PLEASE RETURN FORM TO APPLICANT

PLEASE PRINT so that we may contact you if needed

Name of Professional: _____ Date: ____/____/____

Title: _____

Street Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____ Fax: _____

Attachment D
Service Guide

Metropolitan Council

Answers Your Questions about Metro Mobility

Service Guide effective October 2010



MetroMobility
a service of the Metropolitan Council

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This document contains important information about public transportation for people with disabilities. It is available in alternative formats upon request, and is posted at our accessible website. Contact us online at www.metromobility.org or at the **Metro Mobility Service Center:** 390 North Robert Street, St. Paul, MN 55101. Telephone 651-602-1111 • 651-221-9886 TTY • Fax 651-602-1660

Resolution of Service Problems

Metro Mobility takes all reported complaints and incidents very seriously. We are committed to providing you the highest possible level of service.

Metro Mobility customer service representatives are available to respond to rider issues from 7:30 a.m. to 4:00 p.m. Monday through Friday.

When an issue is filed with the Metro Mobility Service Center, customer service staff will:

- Record a detailed description of the issue.
- Research the complaint.
- Forward information to the transportation provider to help quickly resolve the issue.

It is important to report any problems as soon as possible.

To assist customer service staff, please have the following information available if possible:

- The date and time of the incident.
- Passenger's name and/or vehicle number.
- Details of the incident.

Once a complaint is registered with the Service Center, customers can expect a response within two working days, if requested.



If you have questions about the Metro Mobility Program please contact the Metro Mobility Service Center.

Metro Mobility Service Center

390 Robert Street North, St. Paul, MN 55101

Phone: 651-602-1111 • Fax: 651-602-1660 • TTY: 651-221-9886

Email: metromobility@metc.state.mn.us

Website: www.metromobility.org

Metro Mobility is...

- **Public transportation** for certified riders who are unable to use a fixed-route bus at least some times due to a disability or health condition.
- **First-door-through-first-door service.** Drivers escort every passenger from the first entry door at their pickup through the first entry door at their destination.
- **Complementary** to the public fixed-route transit service, operating in communities and at times when fixed-route transit service is available.
- **A service of the Metropolitan Council,** the regional planning organization for the seven-county Twin Cities metropolitan area. The Council operates Metro Transit, collects and treats wastewater, coordinates regional water resources, plans regional parks and administers funds that provide housing opportunities for low- and moderate-income families and individuals. The Council is appointed by and serves at the pleasure of the governor. Council meetings are held at 390 Robert Street North, St. Paul, Minnesota, 55101, and are always open to the public.
- **Managed by** the Metro Mobility Service Center. The Service Center determines eligibility and administers contracts with transportation providers who deliver the service.
- **Provided by** several different transportation providers. The providers are responsible for hiring drivers, maintaining vehicles and scheduling the rides.

Expectations

Metro Mobility Riders can expect:

- A safe and reliable ride
- Courteous and professional telephone staff
- Professional drivers who have successfully completed extensive training
- Drivers, wearing identification badges, who are appropriately dressed and groomed
- A properly maintained vehicle free of smoke and litter

Door-through-door service

Metro Mobility drivers must assist every rider between the vehicle and the first entry door of the pickup and dropoff. This assistance can include support when walking or pushing a wheelchair.

Drivers are not permitted to go beyond the first entrance of any building.

Riders who need additional assistance may bring a personal care attendant (PCA) to ride with them at no charge.

You should know

Metro Mobility drivers are not permitted to sign release forms when escorting riders out of a building.

Important Contact Information

Anoka County Traveler

www.co.anoka.mn.us

651-602-1170

1-800-627-3529 TTY (MN Relay)

763-323-5556 FAX

Dakota County (DARTS)

www.darts1.org/

651-602-1180

651-234-2288 TTY

651-234-2284 FAX

First Transit

651-602-1120

651-636-4000 TTY

651-628-0211 FAX

Scott County Transit

www.co.scott.mn.us

952-496-8001 Phone & TTY

952-496-1842 FAX

Transit Team

651-602-1100

612-332-5081 TTY

612-332-4116 FAX

Washington County HSI

www.hsicares.org

651-275-4300

651-773-4399 TTY

651-275-4310 FAX

Metro Mobility Service Center

390 Robert Street North, St. Paul, MN 55101

Phone: **651-602-1111** • Fax: **651-602-1660** • TTY: **651-221-9886**

Email: metromobility@metc.state.mn.us

Website: www.metromobility.org

Please note: Providers and service areas are subject to change.
For service hours by community, please see Metro Mobility's
current Service Supplement at www.metromobility.org.

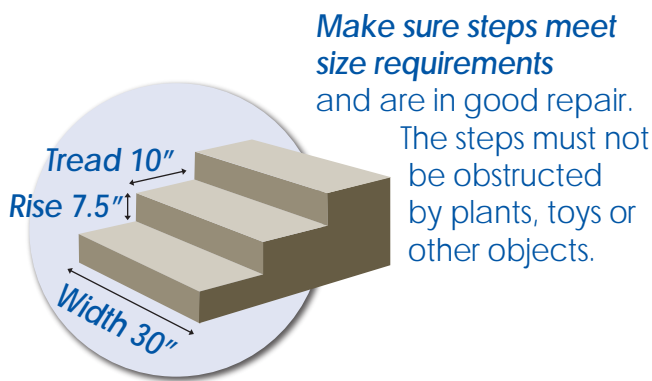
Riding Metro Mobility

Rider safety

Rider safety is our primary concern. Metro Mobility drivers are professionals who meet strict guidelines set by the State of Minnesota. Drivers must successfully complete nearly two weeks of training, which includes passenger assistance, first aid, defensive driving and behind-the-wheel training. In addition, a criminal history background and pre-employment drug screen are done to ensure your safety.

Riders can help keep themselves and others safe by:

- Remaining seated with the seatbelt fastened at all times. (MN state law)
- Keeping sidewalks, ramps, and steps in good repair and clear of ice, snow and other hazards. Steps must provide safe and adequate clearance of at least 30 inches x 7.5 inches x 10 inches.



- Not smoking on or near the Metro Mobility vehicles.
- Refraining from all acts of violence, profanity and sexual harassment.

Mobility devices

Drivers receive extensive training in how to assist passengers, properly secure wheelchairs and scooters, and safely operate the motorized lifts provided on every bus.

All of our buses are equipped with lifts that meet or exceed the minimum ADA Standards.

Riders should:

- Ensure that mobility devices are in good condition including, but not limited to, keeping the brakes in good working order.
- Back their mobility device onto the lift.

Maximum dimensions:

Metro Mobility vehicles **cannot** accommodate devices that are **greater than:**

30 inches wide (OR) 48 inches long (OR) 600 pounds combined weight of the passenger and device.

Failure to follow the safety guidelines may result in a disciplinary suspension, a mandated personal care attendant (PCA), or loss of Metro Mobility service.

Did you know?

Some mobility devices are not intended to be used during transport on a vehicle. These devices may not be safe in the event of a vehicle collision, even if they are secured.

Reserving a ride

Certified riders may reserve a ride up to **four days in advance**, or as little as one day in advance. Reservations are taken seven days per week between the hours of 6:00 a.m. and 5:00 p.m.

For a ride on...	Call as soon as the previous...
Monday -----	Thursday
Tuesday -----	Friday
Wednesday -----	Saturday
Thursday -----	Sunday
Friday -----	Monday
Saturday -----	Tuesday
Sunday -----	Wednesday

Customers may reserve a ride either by calling their provider or by using the online internet-based reservation system. The online reservation system can be used to schedule or cancel a future ride. Customers must be registered with the Metro Mobility Service Center and receive a login name and password to access the online reservations system.

Service area and times

Metro Mobility provides service in areas served by all day local fixed-route transit service and the area designated by the state Legislature known as the "Transit Taxing District." Service hours are adjusted by community as changes are made to the regular fixed-route transit schedule. For specific hours in your community go to **www.metro-mobility.org** or contact the Metro Mobility Service Center.

Scheduling a ride

Please have the following information available when you call to schedule your ride:

- Your name and Metro Mobility ID number **or** birth date.
- The **day** and **date** of your trip.
- The **exact addresses**, including apartment, building, or suite numbers for both your pickup and dropoff. Any additional information that might be helpful, including building name, description and phone number.
- **The time** you would like to be picked up **OR** the time you need to arrive at your destination (appointment time).
- **What type of mobility aide(s)** you will be using.
- **The number of people** traveling with you.

The reservationist will offer you the best available times, based on the buses in your area. To accommodate all rides, reservationists look one hour before and one hour after your requested time. If you do not like the times that are available, the reservationist must book a new trip. **Reservationists** are not allowed to change the original requested time.

Getting to an appointment on time

1. Tell the reservationist you have an **appointment time**.
2. Build in travel time from the drop-off location to your destination inside the building.
3. Remember, it's a shared-ride service. You may not get a direct ride.

Additional passengers

Riders may bring additional passengers with them **if they notify the provider at the time of the reservation.**

Personal Care Attendants (PCA): If you need assistance once you arrive at your destinations you may bring another person along as your **"Personal Care Attendant."** PCAs ride free-of-charge.

Guests: Guests may accompany a certified Metro Mobility rider. Guests are required to pay the standard fare. More than one guest may accompany a certified Metro Mobility rider only as space permits.

Children: Children five and under may ride the vehicle as a guest at no additional charge. Children six and over will be charged the regular fare. For safety reasons

children must be secured in their own seat. If the child is required by law to be in a car seat, the passenger must furnish the car seat and ensure that it is properly secured.

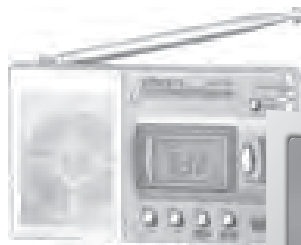
Animals

Service animals: Service and/or therapy animals are always welcome. The animal must be under the control of the rider throughout the trip and while boarding and exiting. Drivers and other passengers may not control the animal at any time. Service animals may sit on the floor or in the rider's lap. Service animals may not sit in a passenger seat.

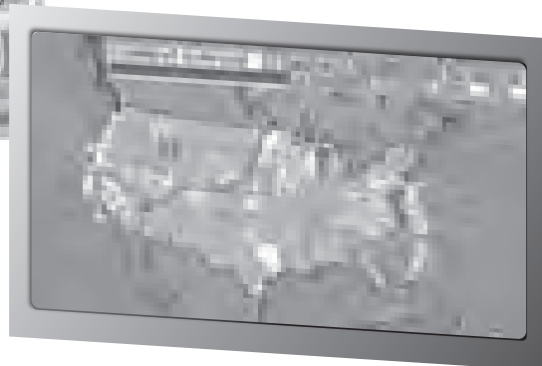
Pets: Riders may bring a pet with them if there is space on the vehicle and the animal is properly caged.

During times of severe weather: Metro Mobility may suspend service for trips from riders' homes and focus on safely returning riders in the community back home. Any decision to suspend service due to severe weather will be broadcast on the following local television and radio stations.

WCCO – AM 830
KSTP – FM 94.5
KFAN – AM 1130
KDWB – FM 101.3



WCCO – TV Channel 4
KSTP – TV Channel 5
FOX – TV Channel 9
KARE – TV Channel 11



Packages

Riders may bring up to four grocery-sized bags or the equivalent. Packages should be able to fit in the area around the rider without taking the space of any other rider. Riders may bring a small folding grocery cart for convenience. A paying guest may also bring up to four bags or small folding cart as well. **Personal care attendants (PCA) are not permitted additional packages.**

Did you know?

Drivers will assist riders with loading and unloading packages, but they are not permitted to assist riders with their packages beyond the first door of any building.

Scheduled ready time

When your trip is scheduled you will be given a **"ready time."** This is the time you should be ready for the vehicle to arrive. Riders should be waiting inside the first door at the building entrance at the scheduled ready time.

Pickup window

We try to arrive as close to the ready time as we can, but because we offer a shared-ride service we cannot guarantee the exact time. The vehicle **should arrive within 30 minutes of the pickup time.**

To accommodate as many people as possible, the vehicle will be considered "on-time" if it arrives within 30 minutes of the scheduled ready time. For example

Did you know?

If your vehicle arrives more than 30 minutes after your scheduled ready time your ride is free.

if your **ready time** is 1:00 p.m. the vehicle should arrive between 1:00 p.m. and 1:30 p.m.

Early pickups

If the vehicle arrives before your scheduled ready time, you are not required to board until your scheduled ready time. However, if you are ready to go early you may board the vehicle before the scheduled ready time.

TIPS FOR A SUCCESSFUL RIDE

- Wait inside the main or designated entrance at your ready time.
- Have your Metro Mobility ID card with you.
- Have correct change or a fare coupon ready before the driver arrives. Drivers do not give change.
- Allow the driver to assist you through the front entrance and while boarding the bus. Drivers are obligated to assist you to and from vehicles even if your disability does not necessitate this level of service.

Canceling your rides

If you do not need your scheduled ride, please call in as soon as possible to cancel the ride. This will allow other passengers to use that timeslot and space.

“No Shows”

A “No Show” is characterized by any of the following.

- Canceling a ride **less than one hour before** the scheduled ready time.
- Canceling or refusing to ride when the vehicle arrives within the 30-minute pickup window.
- Not being at the designated pickup point at the ready time and during the 30-minute pickup window.
- Not having the fare.
- Not having proper Metro Mobility ID.

“No Shows” process

Riders who accumulate three No Shows within a 30-day period will receive a warning letter from the Metro Mobility Service Center. If the rider receives a fourth No Show within 30 days of the first No Show they may be suspended. The suspension will begin approximately 30 days after the fourth No Show. The term of the suspension period may be increased based on the number of previous suspensions within a 12-month period.

Riders may dispute a No Show or suspension at any time after the receipt of the warning or suspension letter by contacting the **Metro Mobility Service Center at 651-602-1111** or by email to **MetroMobility@metc.state.mn.us**.

Did you know?

If a rider “No Shows” the outgoing leg of their trip, all other scheduled trips for that day will be cancelled unless the rider contacts the provider within one hour of the “No Showed” ride.

Please put **“No Show Dispute”** in the subject line along with the details for the No Show you are disputing and why it should not be recorded as a No Show.

Transferring between providers

Metro Mobility Providers

Some trips may require a “transfer” from one Metro Mobility provider to another.

- If your trip requires a transfer, your primary provider will make all of the arrangements for the trip and notify you.
- A transfer trip does not require an additional fare. When you pay the standard fare, the driver will give you a transfer to give to the other provider.
- All transfers take place at sheltered locations with easy access to phones and restrooms, such as transit hubs, fast-food restaurants and major grocery stores.

For the current list of transfer locations go to **www.metromobility.org**.

Transfers to regular fixed-route/ Light Rail

You can transfer between Metro Mobility and the regular fixed-route or light rail service.

If the trip starts on the regular fixed-route bus, present your Metro Mobility approved ID card and pay the 75-cent limited mobility fare. Ask the driver for a transfer, which you can present to the Metro Mobility driver when you board. You will receive a 75-cent credit towards your Metro Mobility fare. Fixed-route transfers are valid for 2.5 hours after they are issued. **You will be required to pay the difference between the Metro Mobility fare and the limited mobility fare when transferring to Metro Mobility.**

Paying for Metro Mobility...

As a public transportation service, a user fee, or fare, is required for each trip. All passengers, **except** children under six years and personal care attendants, are required to pay the standard fare.

The fare will be waived if the vehicle arrives more than 30 minutes past the scheduled ready time.

The fare will be reimbursed upon request via mail if your ride time exceeds 90 minutes for any single trip.

Current Fare Information

Rush Hours	Non-rush hours
\$4.00	\$3.00

Rush Hours ... Monday – Friday

6:00 a.m.- 9:00 a.m. & 3:00 p.m.- 6:30 p.m.

Payment options

- Riders may pay the driver in cash. Riders must have the exact fare. **Drivers do not make change.**
- **Riders may pay with fare tickets, which can be purchased in advance.** Tickets may be ordered online, by mail or at any full-service Transit Store.
- **To order online by credit card,** go to **www.metrotransit.org** and click on “Costs,” then “**Purchase Metro Mobility tickets online.**” You will be directed to the Metro Transit website, where you can order Metro Mobility fare tickets.
- **To order by mail,** contact the Metro Mobility Service Center at 651-602-1111 or 651-221-9886 (TTY) to request an order form. This allows you to purchase by check or credit card.
- **To order in person,** go to any full-service Metro Transit Store. For current locations and store hours go to **www.metrotransit.org**

Holidays

Metro Mobility observes six holidays throughout the year. The non-peak fare is charged for all trips scheduled on these days regardless of the time of day.

Designated Holidays:

- New Year's Day
- Memorial Day (observed)
- Independence Day
(4th of July and observed)
- Labor Day
- Thanksgiving Day
- Christmas Day

Standing orders

Metro Mobility offers standing orders as a convenience for customers. A standing order automatically schedules your routine trips going from the same address to the same address, at the same time, at least one day a week. **All of the other rules of Metro Mobility service apply to your standing order**, including the 30-minute pickup window, shared-ride service, etc.

Requesting a standing order

Riders can request a standing order at any time by submitting a Standing Order Request form to the Metro Mobility Service Center. The form can be downloaded from www.metromobility.org or sent to you by fax or mail by contacting the Metro Mobility Service Center at 651-602-1111 or 651-221-9886 TTY.

Placing new standing orders

Standing orders are reviewed and placed on a monthly basis if space is available at the requested time. Some requests for standing orders may not be accepted based on capacity. Metro Mobility notifies riders about newly approved standing orders by phone. Denial notices are mailed to the rider within ten days.

Return completed forms to:
Metro Mobility Service Center
390 Robert Street North
St. Paul, Minnesota, 55101

Standing order trips will not be provided on these holidays:

- New Year's Day
- Memorial Day (Observed)
- Independence Day (July 4th)
- Labor Day
- Thanksgiving Day and the Friday following
- Christmas Day

Rides who need to travel on any of these days must contact their service provider and schedule a demand ride up to four days in advance.

Metro Mobility Service Center

390 Robert Street North, St. Paul, MN 55101

Phone: 651-602-1111 • Fax: 651-602-1660 • TTY: 651-221-9886

Email: metromobility@metc.state.mn.us

Changing an existing standing order

You can make up to four changes to an existing standing order each year. Contact the Metro Mobility Service Center at least 21 days in advance of any change, as implementing changes may take up to three weeks.

Changes may include:

- Adding one or more days.
- Changing the pickup or dropoff location.
- Changing your home address.
- Changing the pickup time.

Metro Mobility posts standing-order change request forms online at: www.metromobility.org.

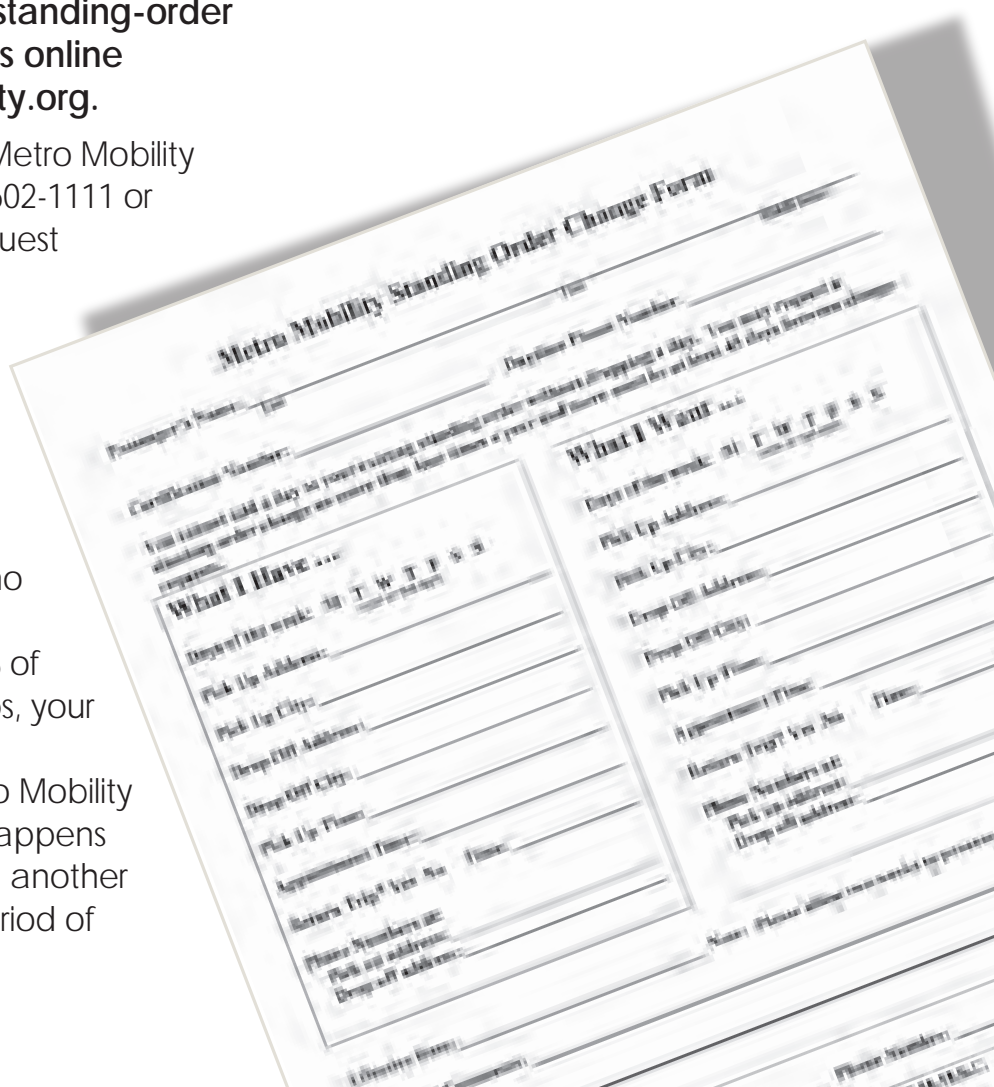
You may also call the Metro Mobility Service Center at 651-602-1111 or 651-221-9886 TTY to request a form. For all other changes contact your provider.

Standing-order cancellations

Standing orders are reserved for people who travel regularly. If you cancel or no-show 40% of your standing order trips, your standing order may be cancelled by the Metro Mobility Service Center. If this happens you will not be granted another standing order for a period of 12 months.

Placing a standing order on hold

When you will not be using your standing order for a period of time, you can put your standing order on hold. A standing order can be placed on hold for as little as a week or for up to **90 days** per calendar year. To place your standing order on hold, please contact your provider. If a standing order is on hold for more than 90 days in a calendar year Metro Mobility may contact you about whether you need your standing order. Standing orders that are on hold longer than 90 days each year may be subject to cancelation by Metro Mobility.



The image shows a 'Metro Mobility Standing Order Change Form'. The form is tilted and contains various fields for user information and trip details. Key sections include:

- Passenger's Name:** A line for the user's name.
- Confirmation Number:** A line for the standing order number.
- Daytime Phone Number:** A line for the user's phone number.
- What I Have:** A section with a heading 'Days of the week: M T W T F S S' and fields for 'Pick Up Address', 'Pick Up City', 'Drop Off Address', 'Drop Off City', 'Pick Up Time', 'Appointment Time', 'Return Trip? Yes No', 'Phone Numbers at: Pick up address: Drop off address:'. There is also a note: 'You cannot add a day to your existing standing order without dropping a day. You may request a standing order change no more than four times a year and there must be at least 48 days between changes.' and a 'Notes' section at the bottom.
- What I Want:** A section with a heading 'Days of the week: M T W T F S S' and fields for 'Pick Up Address', 'Pick Up City', 'Drop Off Address', 'Drop Off City', 'Pick Up Time', 'Appointment Time', 'Return Trip? Yes No', 'Phone Numbers at: Pick up address: Drop off address:'. There is also a 'Notes' section at the bottom.

Supplemental Services

To ensure that our riders get the service that they need, Metro Mobility has implemented several supplemental programs.

Same Day Ride Requests



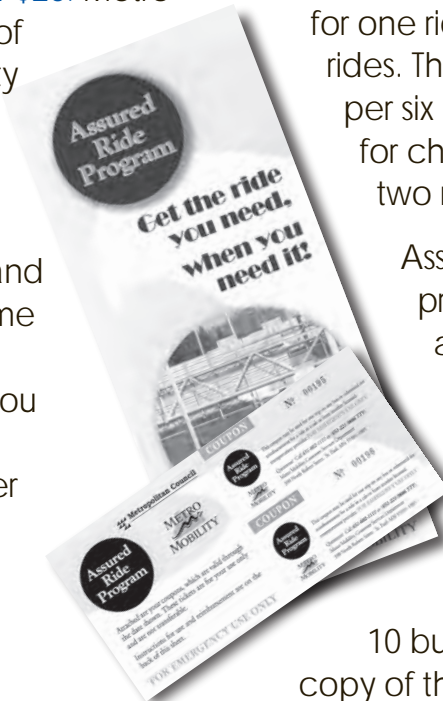
Same day rides can be requested at least **two hours** prior to the requested pickup time during normal reservation hours. They are subject to space availability.

Premium Same Day Service (PSD)

"Premium Same Day Service" allows Metro Mobility certified riders to take a taxi trip at a discounted rate. The rider is responsible for paying the **first \$7** of the cab fare and **all costs over \$20**. Metro Mobility will pay up to \$13 of the taxi fare. Metro Mobility coupons cannot be used to pay the PSD fare.

Process for PSD trips

1. **Contact your provider** and request a "Premium Same Day Ride."
2. **Your provider will** give you a confirmation number.
3. **Contact** the taxi provider with your confirmation number to request the trip.



Assured Ride Home Program

The Assured Ride Program reimburses eligible riders up to \$100 annually for transportation expenses incurred when the rider needs to get home right away for any reason.

The Assured Ride Program will pay for up to four rides by cab or other licensed transport. To be eligible, riders must **average** at least three days of Metro Mobility service weekly and will receive **"request cards"** twice each year. Eligible riders will be sent a request card, which can be completed and mailed to the Metro Mobility Service Center. Two Assured Ride coupons will be sent to the rider. Each coupon authorizes the rider to receive reimbursement of up to \$25 each for eligible ride expenses.

Customers may combine the two coupons for one ride or use them for two separate rides. The maximum reimbursement is \$50 per six months. Metro Mobility pays only for charges incurred on no more than two rides per six-month period.

Assured Ride reimbursements require proof of purchase. Obtain a signed and dated receipt from the driver, then mail the receipt and coupon(s) to the **Metro Mobility Service Center, 390 Robert Street North, St. Paul, Minnesota, 55101**. The reimbursement check will be issued within 10 business days. Be sure to keep a copy of the receipt for your records.

Metro Mobility Service Center

390 Robert Street North, St. Paul, MN 55101

Phone: **651-602-1111**

Fax: **651-602-1660**

TTY: **651-221-9886**

Email: **metromobility@metc.state.mn.us**

Website: **www.metromobility.org**



Alternatives to Metro Mobility

Fixed-route transit service

Metro Mobility certified riders can access fixed-route transit for the limited mobility fare of 75-cent with their Metro Mobility ID card. All of the fixed-route vehicles in the Twin Cities metro area are accessible.

Riders may also combine fixed-route transit and Metro Mobility service.

To transfer between fixed-route and Metro Mobility service, riders pay the first driver and request a transfer. When the second half of the trip occurs on Metro Mobility, the rider pays the balance of the Metro Mobility fare. When the trip starts on Metro Mobility, the fixed-route portion of the trip is free with a valid Metro Mobility ID and a Paratransit Transfer. Ask your driver for a Paratransit Transfer when transferring to another bus.

To obtain fixed-route and schedule assistance by phone call **Metro Transit 612-373-3333**.

Transit Link

Transit Link is a dial-a-ride minibus transit service for the general public that goes where regular transit routes are unavailable. Like Metro Mobility, rides must be reserved in advance. However, Transit Link rides are subject to availability. Transit Link is curb-to-curb service, with limited assistance, though ADA-certified riders may request door-to-door service.

Service is available from Monday through Friday from 6 a.m. to 7 p.m. (some areas have limited Saturday service). To reserve a ride, call **651-602-LINK (5465)** between 7 a.m. and 3:30 pm. You may reserve a ride up to five business days in advance. Fares are based on the distance traveled. For more information, visit www.transitlinktc.org.

Eligibility

Metro Mobility service is for people who are unable to use regular fixed-route transit services due to a disability or health condition. Metro Mobility uses guidelines in the Americans with Disabilities Act (ADA) to determine eligibility. A person might be eligible if:

- They are unable to navigate the regular fixed-route bus system (or)
- They are unable to board or exit the regular fixed-route bus at some locations.
- They are physically unable to get to or from the regular fixed-route bus because of their disability or health condition within an area that the fixed-route serves.

Did you know

Lack of fixed-route service does not qualify a person for Metro Mobility. Fear of riding or difficulty riding the fixed-route are not qualifying factors.

If you have a disability but do not qualify for Metro Mobility, you may still qualify for a reduced fixed-route transit fare of 75 cents. For Metro Transit's Limited Mobility Program requirements, call 612-373-3333.

Length of eligibility

Generally people are eligible for up to four years. Certification dates coincide with the expiration on the rider's Minnesota state ID or driver's license when possible. If a person is of advanced age and has a deteriorating health condition the rider may be certified permanently at the discretion of Metro Mobility staff.

Temporary eligibility

Persons who have a temporary condition that prevents them from accessing the regular fixed-route bus can be approved on a temporary basis up to nine months. Riders who are certified temporarily do not need a Metro Mobility ID card, but must present a valid government issued photo ID for each trip.

Visiting other cities

The eligibility criteria established by the ADA are standard throughout the United States. This means that ADA-certified riders from the Twin Cities can use ADA Paratransit programs like Metro Mobility throughout the country without applying for certification in the city they are visiting for up to 21 days. Because policies and procedures differ from place to place, it is important that you contact the provider in the city you are visiting at least a week before you visit. For a directory of providers, see

www.projectaction.easterseals.com or call (800) 659-6428.

Visiting the Twin Cities

If you are visiting the Twin Cities metropolitan area you must register with the Metro Mobility Service Center prior to your arrival in the Twin Cities. Metro Mobility will request a letter from the transit agency in your home state, which verifies your eligibility under the Americans with Disabilities Act (ADA).

Children

Children whose disability (as opposed to their age) would prevent them from using a regular fixed-route bus may be eligible. Children under age six must travel with a personal care attendant (PCA).



Metro Mobility Service Center

390 Robert Street North, St. Paul, MN 55101

Phone: **651-602-1111** • Fax: **651-602-1660** • TTY: **651-221-9886**

Email: **metromobility@metc.state.mn.us**

Website: **www.metromobility.org**

Certification Process

To determine eligibility, all applicants must complete the certification process. There is **NO CHARGE** to become certified with Metro Mobility.

STEP ONE: Submit an application

Applicants submit a **two-part** application designed to assess the applicant's ability to use regular fixed-route transit service.

PART 1: Certification Questionnaire, completed by the applicant.

PART 2: Professional Verification Form filled out by one of the following professionals who are familiar with the applicant's condition:

- Physicians or Psychiatrists
- Occupational Therapists
- Psychologists
- Physical Therapists
- Licensed Independent Social Workers (LISW, LICSW)
- Recreational Therapists
- Speech-Language Pathologists
- Certified Orientation and Mobility Specialists
- Registered Nurses (RN)

The Application/Recertification Packet is available online at www.metromobility.org or by calling the Metro Mobility Service Center at 651-602-1111 or 651-221-9886 TTY. Materials may be provided in alternative formats upon request.



Both the Certification Questionnaire and the Professional Verification Form must be submitted together to:

**Metro Mobility Service Center
390 Robert Street North
Saint Paul, MN 55101**

Metro Mobility does not accept certification forms by fax.

STEP TWO: Review of application

Metro Mobility staff will review the application packet. Usually this provides us with all of the information we need to make a determination on eligibility. Sometimes, however, more information is needed. When this happens applicants may be asked to come in for an **“in-person assessment.”**

In-person assessment

The in-person assessment is designed to evaluate the applicant’s ability to use regular fixed-route transit service. It may include a combination of the following:

- **A conversation about the applicant’s current mobility.** The Metro Mobility evaluator will talk about how the applicant currently gets around.
- **A pretend bus trip on the computer.** This standardized test is designed to measure a person’s cognitive ability to use regular fixed-route transit. (Functional Assessment of Cognitive Transit Skills.)
- **A walk outside or through the skyway.** This will help determine things such as physical ability to get to the regular fixed-route bus as well as memory and landmark recognition.
- **A standard walking and balance test.** This standardized test measures a person’s risk of falling. (Tinetti Gait and Balance Test).

Did you know?

A Metro Mobility trip can be scheduled for the in-person assessment at no charge within the Metro Mobility Service area.

STEP THREE: Get your photo ID

Once an applicant is determined eligible for Metro Mobility, they need to get a Metro Mobility-approved ID card. There are two options.

1. Come to the Metro Mobility Service Center in St. Paul and receive a Metro Mobility ID card at **NO CHARGE** to you.
2. Contact Minnesota DVS (Driver and Vehicle Services) at 651-296-6911 or 651-282-6555 TTY to request a duplicate license or state ID. Metro Mobility will put on an “A” to signify that the applicant is certified under the ADA.

Applicants can apply for a reduced-fee state ID, using the form at www.4dmv.com/states/mn/reducedfeeidcard.pdf

Metro Mobility can issue you a duplicate ID card, if the original one is lost. To order a duplicate ID contact the Metro Mobility Service Center. **There is a \$5.00 fee for all replacement ID cards.**

Glossary of Terms

ADA – The Americans with Disabilities Act is a federal law protecting the civil rights of people with disabilities.

ADA Paratransit – Public transit comparable to fixed-route public transit for people whose disability or health condition creates undue barriers to the use of fixed-route transit. Paratransit routes are based on reservations for the day. Vehicles transport more than one passenger and make multiple stops per trip.

Assured Ride – A program that creates a safety net for high-frequency riders by annually providing up to four taxi or shuttle ride coupons, each worth up to \$25.

Fixed-route transit – Public transit service, usually provided by bus or rail, which operates on predetermined routes and schedules.

No Show – A failure by a rider to meet the driver within the pickup window for a scheduled trip, or a cancellation by a rider that occurs less than 60 minutes before the scheduled pickup.

PCA (Personal Care Attendant) – Riders who need assistance may include one PCA when they reserve a trip. PCAs ride for free.

Pickup window – Drivers are considered “on time” if they arrive within a 30-minute window that follows the scheduled pickup.

Ready time – The scheduled pickup time when riders should be ready and waiting for the vehicle to arrive.

Service provider – Private companies or localities that operate designated portions of the Metro Mobility system, under the management of Metro Mobility.

Metro Mobility Service Center – The office where Metro Mobility manages paratransit service and the application and recertification process, establishes standing orders, and responds to service issues, comments and complaints. It is located in downtown St. Paul, Minnesota.

Standing order – An application-based program, subject to availability, that allows riders to pre-schedule their daily or weekly recurring trips.

STS – Minnesota's Special Transportation Services rules establish driver training and vehicle safety requirements for the Metro Mobility program. The Minnesota Department of Transportation, Office of Motor Carriers, assures compliance.



The Metropolitan Council is the regional planning organization in the seven-county Twin Cities metropolitan area that includes Minneapolis and St. Paul, Minnesota. The Council runs the regional bus, Metro Mobility and light rail systems, collects and treats wastewater, coordinates regional water resources, plans regional parks and administers funds that provide housing opportunities for low- and moderate-income families and individuals. The Council is appointed by and serves at the pleasure of the Governor. Council meetings are held at 390 North Robert Street, St. Paul, Minnesota and are always open to the public.



Additional information about the Metropolitan Council is posted at www.metrocouncil.org.



MetroMobility
a service of the Metropolitan Council



Metropolitan Council

Metro Mobility Service Center

390 North Robert Street
St. Paul, MN 55101-1805

PRSR STD
US POSTAGE
PAID
PERMIT 7029
ST. PAUL, MN

Attachment E
Eligibility Approval Letters

Appeal letter
Bottom part is Temp ID card.



NOT A REAL CHL
Metro Mobility

July 11, 2011

Dear Fake Fake:

Thank you for renewing your Metro Mobility ADA Certification. You are now eligible until 1/31/2020. Your Metro Mobility ADA Identification number is **46557**.

If a new Metro Mobility ID was not included with this letter you must renew your Metro Mobility ID. Please see the enclosed information which explains that process. **To ride Metro Mobility you must provide a valid Metro Mobility ID Card each time you ride. Please get your Metro Mobility ID Card within the next 90 days. Failure to do so may result in a loss of service.**

INFORMATION REGARDING YOUR ADA ID CARD. It is important that you have a valid ADA ID Card as you may be asked to present the card each time you board the vehicle. See the attached sheet for complete details.

The bottom portion of this letter contains the following information.

Metro Mobility ID Number: This number may be used when scheduling rides.

Primary Provider Name: This is the name of your primary provider.

Phone Number: The phone number for your primary provider to schedule, cancel and inquire about your ride status. Both the voice line and the TTY for hearing impaired persons are listed.

Eligibility Status:

Unconditional: You can use ADA public transit service for all your trips.

Conditional: Under certain conditions you may be able to use other modes of public transit.

Temporary: You are eligible for a limited period of time.

If you have questions or concerns about your ADA Certification please contact the Metro Mobility Service Center

Voice: 651-602-1111 TTY: 651-221-9886

The bottom portion of this letter may be detached and used as proof of ADA Eligibility until you receive your ADA ID Card.

www.metrocouncil.org

390 North Robert Street • St. Paul, MN 55101-1805
(651) 602-1111 • Fax (651) 602-1660 • TTY (651) 291-9886

An Equal Opportunity Employer

ADA INFORMATION

NAME: Fake Fake

Metro Mobility ID Number: 46557

Primary Provider: HUMAN SERVICES INC

Phone Number: 651-275-4300 Voice
651-773-4399 TTY

Eligibility Status:

(Unconditional, Conditional, Temporary)



Metro Mobility Service Center
Metropolitan Council

390 North Robert Street
St. Paul, MN 55101-1805

Phone: (651) 602-1111

Attachment F
Eligibility Denial Letters

May 10, 2013

XXXXXXX
XXXX
XXXXXXX

Dear XXXXXXX XXXXXXX:

Based on your application and information provided by your Professional Verification form Metro Mobility Service Center is denying your application for paratransit services.

Reason for Determination

You applied for Metro Mobility based on an assumed future level of functioning due to a medical procedure. However, federal guidelines insist that eligibility be based on *current* functional ability. Because assumed future limitations cannot be used to determine ADA paratransit eligibility, we cannot certify you for Metro Mobility at this time. Please contact me at 651-602-1662 after your procedure and I will do everything I can to expedite your eligibility determination.

The Federal Law is very specific about ADA paratransit eligibility. The law restricts eligibility to individuals who are *unable* to utilize regular fixed-route service due to a physical or mental disability. Further the Federal Law states that if using the regular fixed-route system is *hard or harder* for an individual with a disability, this does not qualify said individual for ADA Paratransit/Metro Mobility services. Based on the information you reported on your application, there is no indication that you are *unable* to utilize public transportation. Additionally, the information provided by your Professional Verification form did not sufficiently support your need to use paratransit services.

Appeal Process

- If you wish to appeal this decision, you may do so by **sending a written statement** in which you discuss the reasons why you feel you are eligible for ADA paratransit services, such as Metro Mobility.
- Your statement should include **additional information** about **any limitations** you have that **make it impossible for you to use regular-route** bus service.
- The appeal must be signed by you or your legal guardian, submitted within sixty days, and sent to: ADA Eligibility Appeals Committee, Metropolitan Council, 390 Robert St. N, Saint Paul, MN 55101.

You will receive a notice of when the committee will meet should you elect to appeal this decision. You are encouraged to attend the appeal hearing and provide additional information or respond to further questions that committee members may have about you and your ability to use public transportation.

We would encourage you to use the regular fixed-route bus service operated by Metro Transit. Metro Transit currently has a service for people with disabilities called The Mobility Program. This program is not governed by federal regulations and allows people with disabilities to pay a seventy-five (\$.75) cent fare for all trips, regardless of the time of travel. We have enclosed an information packet for The Mobility Program which includes an application.

Again, our staff has determined that you are not eligible for ADA paratransit services and therefore your application has been denied. If you have questions about this determination, or the Federal Eligibility Guidelines, please feel free to contact our ADA Paratransit Evaluator at 651-602-1662.

Sincerely,

Andy Streasick
Customer Service Manager

Possible explanations:

You reported in your application that you currently access the Metro Transit bus/rail system independently.

The symptoms of your psychiatric disabilities, as reported by your medical professional, do not prevent you from being oriented to person, place or time in any way that would qualify you for ADA paratransit under Federal Guidelines.

Your medical professional explicitly stated in your application that you do not currently have a disability or health condition that would qualify you for ADA paratransit under Federal Guidelines.

You reported in your application that your seizures have been under control for over a year, and that you have no limitation in judgment or behavioral inhibition as a result of your neurological disability.

Neither your visual field nor acuity, as reported by your medical professional, is currently impaired to an extent that would qualify you for ADA paratransit under Federal Guidelines.

You reported in your application that your need for Metro Mobility certification stems from lack of bus service in your area. Unfortunately, such limitations to the fixed-route transit system do not qualify you for ADA paratransit under Federal Guidelines. You may be eligible for transportation through Transit Link, a service provided through the Metropolitan Council to individuals who live in areas of the Metro not served by Metro Transit buses. For more information on Transit Link, please call 651-602-5465.

The symptoms of your health condition, as reported by your medical professional, do not currently prevent you from being able to navigate or physically access the Metro Transit bus/rail system.

Applicants for Metro Mobility certification who are under six years of age are evaluated based on their ability to access fixed-route transportation *with a parent or guardian*. Your application has been denied based on this standard. **Please note that you can reapply for Metro Mobility after reaching the age of six years**, and should you choose to do so you will be reevaluated at that time based on your ability to *independently* access fixed-route transportation.

Paratransit service is an accommodation to public transportation for individuals with a disability mandated by the Americans with Disabilities Act (ADA). It's a service related directly and only to public transportation. Lack of availability of a personal vehicle or lack of ability to operate a personal vehicle does not fall within the determination criteria of the ADA.

Your medical professional made no indication in your application that you currently have a disability or health condition that would qualify you for ADA paratransit under Federal Guidelines.

Age does not fall within the criteria of the minimum requirements since it is by definition not a diagnosed disability.

You applied for Metro Mobility based on an assumed future level of functioning due to a medical procedure. However, federal guidelines insist that eligibility be based on *current* functional ability. Because assumed future limitations cannot be used to determine ADA paratransit eligibility, we cannot certify you for Metro Mobility at this time. Please contact me at 651-602-1662 after your procedure and I will do everything I can to expedite your eligibility determination.

→ Could be one of above, or something else if there isn't any.

August 7, 2013

XXXXXX
XXXXXX
XXXXXX

Re: Americans with Disabilities Act (ADA) Eligibility Determination

Dear XXXX:

This letter is to confirm that, as explained to you by Metro Mobility's ADA Paratransit Evaluator, you do not meet the eligibility criteria established by the Americans with Disabilities Act Paratransit Regulations. Therefore your application is denied. This decision was based on three major components:

- Information reported by you on the application form
- Information supplied by XXXX, LICSW
- In-person interview conducted XXXX X, XXXX at the Metro Mobility Service Center

Deciding factors in the decision are:

1. In your application, you stated that you are a person with asthma, asperger's, arthritis, and ADHD diagnoses. Answers you gave to questions during your assessment indicate that your disabilities do not prevent you from being able to utilize fixed-route public transit. You explained that you have regularly taken the bus in the past, successfully completing trips involving multiple transfers. You disclosed that you independently walk to various locations near your home, and were able to provide detailed directions to frequent destinations that are further away. These skills indicate memory recall, focus, and landmark recognition that should be transferable to travel using the City Bus. Finally, you explained that your asthma is controlled by medication and that you currently seldom use your inhaler.
2. Your score on the Functional Assessment of Cognitive Transit Skills (FACTS) confirms that you are currently capable of independent travel using fixed-route. The FACTS is a standardized evaluation tool proven to accurately indicate an individual's ability to ride the bus. During the FACTS, you successfully recognized and recalled specific buses, bus stops, and landmarks. You also displayed problem solving skills, capability to follow multi-step directions, appropriate stranger boundaries, and the ability to seek assistance from the driver if needed.
3. Your score on the Tinetti Gait and Balance Test indicates that you are not at increased risk of falling because of your physical disabilities. This test measures one's ability to ambulate safely by examining indicators including stability, trunk sway, step symmetry, and stance.
4. As part of your assessment, you were taken on a nine-block walk through downtown Saint Paul. The trip included managing inclines and steps, crossing streets of multiple lengths within one light cycle, and ambulating on a variety of surfaces. You completed the walk successfully

without displaying outward signs of discomfort like gait change, excessive sweating, or shortness of breath.

5. As part of your assessment, you were taken on a nine-block walk through the Downtown Saint Paul skyway system. Midway through the trip you were asked to lead the way back to the Metro Mobility Service Center. You did so without error, exhibiting memory recall, landmark recognition, and focus while traveling in a crowded, complex environment that was new to you.
6. You also stated on your application that you are:
 - Able to tolerate very hot or very cold weather
 - Able to recognize destinations, bus stops, and landmarks
 - Able to tolerate air conditions such as smog, perfume, and fumes
 - Able to travel at night (free from night blindness)
 - Able to recognize printed information
 - Able to hear and process spoken words or auditory information
 - Able to communicate your needs
 - Able to follow directions
 - Able to deal with unexpected situations (such as bus detours)
 - Able to travel safely and effectively through crowded and/or complex facilities
 - Able to recognize curbs and other drop-offs
 - Able to travel independently along sidewalks and other pedestrian ways
 - Able to cross streets independently
 - Able to find the correct bus stop
 - Able to identify the correct bus
 - Able to safely enter/exit the bus
 - Able to get on and off a bus that has a lift platform
 - Able to deposit fare into the fare box or show bus pass
 - Able to get to a set position and remain seated during a bus trip
 - Familiar with what to do if you miss your bus

The Federal Law is very specific about ADA paratransit eligibility. The law restricts eligibility to individuals who are *unable* to utilize regular fixed-route service due to a physical or mental disability. Further, the Federal Law states that if using the regular fixed-route system is *hard or harder* for an individual with a disability, this does not qualify said individual for ADA paratransit/Metro Mobility services. Based on the information you reported on your application, coupled with the in-person interview, there is no indication that you are *unable* to utilize public transportation.

- Additionally, the documentation you submitted from XXXX, LICSW does not provide any additional information to substantiate the need for ADA paratransit/Metro Mobility service.

We would encourage you to use the regular fixed-route bus service operated by Metro Transit. Metro Transit currently has a service for people with disabilities called The Mobility Program. This service is not governed by federal regulations and allows people with disabilities to pay a seventy-five (\$.75) cent fare for all trips, regardless of the time of travel. For that reason, we have enclosed an information packet for The Mobility Program which includes an application.

If you are interested in receiving training to build familiarity and comfort with the Metro Transit bus system, the Metropolitan Council has Customer Advocates on staff to assist you. Their contact information is included on the "Commute with Confidence" flier, also enclosed.

If you wish to appeal this decision, you may do so by sending a written statement in which you discuss the reasons why you feel you are eligible for paratransit services. Your statement should include additional information about any limitations you have that prevent you from utilizing the regular fixed-route system. The appeal must be signed by you or your legal guardian, submitted within sixty days, and sent to: ADA Eligibility Appeals Committee, Metropolitan Council, 390 Robert St. N, Saint Paul, MN 55101.

You will receive a notice of when the committee will meet should you elect to appeal this decision. You are encouraged to attend the appeal hearing and provide additional information or respond to further questions that committee members may have about you and your ability to use public transportation.

Again, our staff has determined that you are not eligible for paratransit services and therefore your application has been denied.

Sincerely,

XXX XXXX

Manager of Customer Service

Possible explanations:

You reported in your application that you currently access the Metro Transit bus/rail system independently.

Neither your visual field nor your acuity, as reported by your medical professional, is currently limited to an extent that would qualify you for ADA paratransit under Federal guidelines.

Your ability to ambulate, as reported by your medical professional, is not currently limited by your disability or health condition to an extent that would qualify you for ADA paratransit under Federal guidelines.

You reported on your application that your need for Metro Mobility certification stems from the lack of bus service in your area. Unfortunately, such limitations to the fixed-route transit system are not a factor in evaluating ADA paratransit eligibility under Federal guidelines.

You may qualify for rides through the Metropolitan Council's Transit Link program. Transit Link is a general-public transportation service that provides rides in areas of the Metro that are not served by Metro Transit buses. For more information on Transit Link, please call 651-602-5465.

The symptoms of your psychiatric disabilities, as reported by your medical professional, do not currently disorient you from person, place or time that would qualify you for ADA paratransit under Federal guidelines.

Attachment G
Permanent Eligibility Policy

Effective 7-1-09 the following are Metro Mobility's guidelines for permanent (1-1-2200) paratransit eligibility:

In order for an applicant to be eligible for permanent paratransit eligibility he or she must **have full (unconditional) paratransit eligibility**. The applicant must also be in a situation where future advancements in technology or newly developed skills are unlikely to alter eligibility status because of either **advance age (65+) or reduced life expectancy as a symptom of a health condition or disability**.

Attachment H
Appeal Panel Procedures

METRO MOBILITY APPEALS PANEL PROCEDURES

I. DEFINITIONS

- A. **“Appellant”** means the person who is seeking eligibility certification for Metro Mobility service or the certified Metro Mobility rider who does not concur with a service restriction placed on the rider.
- B. **“Council Liaison”** means the Council staff person, *from the Office of Diversity and Equal Opportunity*, who is responsible for administrative assistance to the Panel.
- C. **“Metro Mobility Representative”** means the staff person from the Council’s Metro Mobility program presenting the Metro Mobility General Manager’s decision of ineligibility or establishment of a service restriction.
- D. **“Panel”** or **“Appeals Panel”** means the Metro Mobility Appeals Panel which is appointed by the Regional Administrator to review the Metro Mobility General Manager’s decision of ineligibility or establishment of a service restriction.
- E. **“Presider”** means the member of the Appeals Panel designated by the Council’s Regional Administrator to preside at an appeals hearing.

II. APPEALS PANEL

- A. The Regional Administrator shall appoint a three (3) person Appeals Panel to decide the appeal, composed of:
 - 1. The Chair of the Council’s Transportation Accessibility Advisory Committee (TAAC), or the Chair’s designee;
 - 2. An individual who is professionally involved with persons with disabilities; and
 - 3. A professional acquainted with the Appellant’s particular stated disability, selected from a list of knowledgeable volunteers recommended by members of the TAAC.
- B. The Appeals Panel shall be impartial. Any member of the Appeals Panel shall withdraw from participation in the appeals process at any time if the member deems himself or herself disqualified for any reason.
- C. If, as part of the appeal, the Appellant requests a hearing, the hearing shall be scheduled as soon as is administratively possible after the Council Liaison receives the Appellant’s hearing request.
- D. The Appeals Panel shall not communicate with the Appellant or the Metro Mobility Representative, in connection with any issue of fact or law before the Panel, except at the hearing.

III. THE HEARING

- A. The Presider shall have all powers necessary and reasonable to conduct a fair and orderly hearing, including, but not limited to:
 - 1. The power to make rulings on the admissibility of evidence;
 - 2. The power to exclude witnesses from the hearing room so that they cannot hear the testimony of other witnesses, provided that the parties to the hearing may not be excluded;
 - 3. The power to limit questions by the other members of the Panel;
 - 4. The power to ask questions at any time of parties or witnesses;
 - 5. The power to receive exhibits, written evidence, and other documents into the appeal record;
 - 6. The power to maintain order during the hearing including the power to expel any witness, not a party, who is disrupting the hearing process;
 - 7. The power to reconvene the hearing if circumstances warrant.
- B. All relevant evidence, including reliable hearsay, is admissible if it is the type of evidence on which reasonable persons are accustomed to rely in the conduct of their serious affairs. Evidence that is irrelevant to the matters at issue or unduly repetitious may be excluded by the Presider.
- C. The Presider shall open the hearing by introducing the Panel members. The Presider will then state the procedural rules for the appeal hearing.
- D. Both parties may present and examine evidence and documents, offer rebuttal testimony, present an argument with respect to the issues, and cross-examine witnesses. Parties shall have the right to retain and be represented by counsel (at the party's own expense).
- E. Any party may be a witness or may present witnesses on his or her own behalf at the hearing. **Parties must have all evidence to be presented, both oral or written, available on the scheduled hearing date.**
- F. The Presider will determine the order of presentation of witnesses and evidence. Ordinarily, the Metro Mobility Representative will be asked to proceed with the Metro Mobility's presentation of evidence first. However, the Metro Mobility Representative's evidence shall not be given deference by the Panel.
- G. All hearings shall be audio tape-recorded. The Council Liaison will secure taping equipment for the hearing.
- H. Following the presentation of evidence, the Presider will close the appeal record and adjourn the hearing.
- I. If the Appellant does not appear at a scheduled hearing, the Panel may:
 - 1. Direct the Council Liaison to reschedule the hearing;
 - 2. Determine that the Panel will decide the appeal based on the parties' written submittals and any witnesses or other evidence available at the scheduled hearing; or
 - 3. Direct the Council Liaison to attempt to contact the Appellant to determine why the Appellant did not appear at the hearing and report back to the Presider, who may reconvene the hearing.

IV. DECISION OF THE PANEL

- A. In eligibility appeals, the Panel shall make its determination based on eligibility criteria as established in federal regulations, particularly 49 CFR, parts 37.5 and 37.123, and in accordance with applicable federal, state, and local laws. The Panel shall not make a determination on any issues unrelated to the eligibility of the Appellant.
- B. In appeals of service restrictions, the Panel shall make its determination based on the propriety and severity of the service restriction, in accordance with applicable federal guidance and regulations, including 49 CFR, part 37.5 and part 37.127, subpart (h), and in accordance with applicable federal, state, and local laws. The Panel shall not make a determination on any issues unrelated to the service restriction.
- C. The Presider shall call together the Panel to prepare a written decision stating the Panel's findings and reasons for the decision. Factual determinations shall be based solely on the parties' written submittals and, if a hearing was held, evidence presented at the hearing for inclusion in the appeal record. No other factual information or evidence shall be considered by the Panel. The Council Liaison may assist the Panel in preparing the written decision.
- D. The Presider shall give the Panel's written decision to the Council Liaison within twenty-one (21) days of the hearing or, if the Appellant does not request a hearing, within twenty-one (21) days of the Council Liaison's receipt of the Appellant's notification that no hearing is requested. The Council Liaison shall promptly forward a copy of the Panel's written decision to each of the parties or their counsel and shall take whatever action is necessary to ensure compliance with the decision. Decisions of the Panel shall be reached by majority vote. If a hearing was held, Panel members must have been present at the hearing in order to vote a decision.
- E. The Panel must issue its written decision within thirty (30) days of the hearing or, if the Appellant does not request a hearing, within thirty (30) days of the Council Liaison's receipt of the Appellant's notification that no hearing is requested.
- F. In eligibility appeals, if the Panel does not issue a written decision within thirty (30) days, the appeal shall be considered to be granted and the Appellant shall be certified eligible for Metro Mobility service by the Metro Mobility General Manager.
- G. In appeals of service restrictions, the service restriction shall not be in effect during the appeals process. If the Panel does not issue a written decision within thirty (30) days, the appeal shall be considered to be granted and the Appellant shall not be subject to the service restriction.

Attachment I
Appeal Decision Letters

Form letter if upheld

CERTIFIED MAIL: [#insert tracking number]

[insert date]

**[insert appellant name
and address]**

Dear **[insert appellant name]**:

The ADA Paratransit Appeals Panel upheld the Metro Mobility determination for **denial** of ADA paratransit eligibility. Attached is the decision of the Appeals Panel regarding your appeal for ADA Paratransit Metro Mobility certification.

If you have any questions concerning the appeal process or interpreting the appeal decision, please contact me at (651) 602-1085.

The ADA Paratransit Eligibility Appeals Panel indicated in their findings that should your medical conditions change, and/or you have medical documentation, you can **reapply by filing a new application** with the Metro Mobility Service Center. They can be contacted at (651) 602-1111.

Sincerely,

Wanda F. Kirkpatrick
Director, Equal Opportunity

Attachment

cc: Paul Colton, General Manager, Metro Mobility Service Center
Andrew Streasick, ADA Paratransit Evaluator, Metro Mobility Service Center

Appeal Decision Form
Letter

Date

Name & Address

Dear :

Attached is the decision of the appeals panel regarding your appeal for ADA Paratransit Metro Mobility certification.

If you have any questions concerning the appeal process or interpreting the appeal decision, please contact me at (651) 602-1085.

Sincerely,

Wanda Kirkpatrick
Director, Equal Opportunity

cc: Paul Colton, General Manager, Metro Mobility Service Center

Attachment

(Don't print this on original letter – this is a follow-up reminder. In addition to mailing decision letter to Metro Mo General Mgr. and the appellant, also email it to the three Panel Members + Andy Streasick. Print email and place in appellant's file.)

**Metro Mobility ADA Paratransit Appeals Panel Decision
(NAME OF APPELLANT)**

Background

On (day of week), (month/day/year), a Metro Mobility ADA Paratransit Appeals Panel conducted a hearing at _____ a.m. in Room _____ of the Robert Street Building in St. Paul to hear the appeal of _____ who had been determined to be ineligible for Americans with Disabilities Act (ADA) Paratransit certification by the Metro Mobility Service Center General Manager.

The Appeals Panel consisted of _____, _____, and _____ who presided at the hearing. Others present at the hearing included the appellant, _____; Metro Mobility Service Center (MMSC) representative, Andy Streasick; and Metropolitan Council staff liaison, Wanda Kirkpatrick.

Review of Information and Appeals Panel Discussion

After hearing from both the MMSC representatives and the appellant; and after the appeals panel members asked all questions they deemed necessary of both the appellant and the MMSC representatives to thoroughly understand the issues involving this appeal; and after the appeals panel reviewed all the initial written information concerning this appeal and other supporting medical information provided at the hearing by the appellant; the appeals panel determined that _____ be certified for use of Metro Mobility transit service at this time.

Appeals Panel Decision

It is the decision of the ADA Paratransit Appeals Panel that the MMSC General Manager's determination for denial of ADA paratransit eligibility certification for _____ not be upheld and that he be certified for use of Metro Mobility transit service at this time. The appellant did present new information to provide a basis to reverse the MMSC General Manager's decision.

Copies of this decision will be provided to the appellant and the MMSC's General Manager.

Attachment J
Hours and Days of Service by Community

COMMUNITY	WEEKDAYS		SATURDAY		SUNDAY	
Andover**	6:00 a.m.	8:00 p.m.	8:00 a.m.	6:45 p.m.	none	none
Anoka	5:15 a.m.	10:45 p.m.	7:00 a.m.	8:00 p.m.	8:00 a.m.	4:00 p.m.
Apple Valley	4:45 a.m.	11:30 p.m.	8:00 a.m.	8:45 p.m.	8:00 a.m.	4:00 p.m.
Arden Hills	5:15 a.m.	7:30 p.m.	8:00 a.m.	8:00 p.m.	8:00 a.m.	4:00 p.m.
Bayport	6:00 a.m.	6:00 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Baytown Twp.	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Birchwood Village	5:45 a.m.	10:30 p.m.	6:15 a.m.	8:00 p.m.	8:00 a.m.	4:00 p.m.
Blaine	5:00 a.m.	12:30 a.m.	5:45 a.m.	11:30 p.m.	8:00 a.m.	10:00 p.m.
Bloomington	24HR	24HR	24HR	24HR	24HR	24HR
Brooklyn Center	24HR	24HR	24HR	24HR	24HR	24HR
Brooklyn Park	3:45 a.m.	2:00 a.m.	3:45 a.m.	2:00 a.m.	4:45 a.m.	1:00 a.m.
Burnsville	5:00 a.m.	11:45 p.m.	7:15 a.m.	10:30 p.m.	7:30 a.m.	9:30 p.m.
Centerville	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Champlin	5:15 a.m.	10:45 p.m.	7:00 a.m.	8:00 p.m.	8:00 a.m.	4:00 p.m.
Chanhassen	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Chaska	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Circle Pines	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Columbia Heights	4:15 a.m.	2:45 a.m.	4:15 a.m.	2:45 a.m.	4:15 a.m.	2:45 a.m.
Coon Rapids	5:15 a.m.	12:30 a.m.	5:45 a.m.	11:30 p.m.	8:00 a.m.	10:00 p.m.
Cottage Grove	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Crystal	4:15 a.m.	1:45 a.m.	3:45 a.m.	2:00 a.m.	4:45 a.m.	12:45 a.m.
Dayton**	5:15 a.m.	10:45 p.m.	none	none	none	none
Deephaven	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Dellwood	6:00 a.m.	6:00 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Eagan	5:15 a.m.	11:45 p.m.	7:45 a.m.	9:15 p.m.	8:00 a.m.	9:00 p.m.
Eden Prairie	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Edina	4:15 a.m.	2:15 a.m.	4:15 a.m.	2:15 a.m.	5:15 a.m.	1:45 a.m.
Excelsior	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Falcon Heights	5:00 a.m.	2:00 a.m.	5:00 a.m.	2:00 a.m.	5:15 a.m.	12:45 a.m.
Fort Snelling (unorg.)	24HR	24HR	24HR	24HR	24HR	24HR
Fridley	4:15 a.m.	2:45 a.m.	4:15 a.m.	2:45 a.m.	4:15 a.m.	2:45 a.m.
Gem Lake	6:00 a.m.	6:00 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Golden Valley	24HR	24HR	24HR	24HR	24HR	24HR
Greenwood	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Hilltop	4:15 a.m.	2:45 a.m.	4:15 a.m.	2:45 a.m.	4:15 a.m.	2:45 a.m.
Hopkins	5:00 a.m.	2:00 a.m.	5:00 a.m.	2:00 a.m.	5:15 a.m.	2:00 a.m.
Inver Grove Heights	5:15 a.m.	1:45 a.m.	6:15 a.m.	1:45 a.m.	7:00 a.m.	12:30 a.m.
Jackson Twp.**	5:15 a.m.	6:45 p.m.	none	none	none	none

COMMUNITY	WEEKDAYS		SATURDAY		SUNDAY	
Lake Elmo	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Lakeville**	5:00 a.m.	11:30 p.m.	8:00 a.m.	8:30 p.m.	none	none
Landfall	5:15 a.m.	10:30 p.m.	6:15 a.m.	8:00 p.m.	8:00 a.m.	4:00 p.m.
Lauderdale	4:45 a.m.	1:45 a.m.	5:15 a.m.	2:00 a.m.	6:15 a.m.	12:45 a.m.
Lexington	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Lilydale	5:15 a.m.	11:45 p.m.	8:00 a.m.	8:45 p.m.	8:00 a.m.	6:15 p.m.
Lino Lakes	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Little Canada	4:30 a.m.	11:45 p.m.	6:15 a.m.	9:45 p.m.	6:30 a.m.	7:30 p.m.
Long Lake	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Mahtomedi	5:15 a.m.	10:30 p.m.	6:15 a.m.	8:00 p.m.	8:00 a.m.	4:00 p.m.
Maple Grove	5:15 a.m.	9:15 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Maplewood	4:30 a.m.	1:45 a.m.	4:15 a.m.	1:45 a.m.	4:15 a.m.	1:30 a.m.
Medicine Lake	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Mendota	5:15 a.m.	8:15 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Mendota Heights	5:15 a.m.	11:45 p.m.	8:00 a.m.	8:45 p.m.	8:00 a.m.	6:15 p.m.
Minneapolis	24HR	24HR	24HR	24HR	24HR	24HR
Minnetonka	5:00 a.m.	2:00 a.m.	5:00 a.m.	2:00 a.m.	5:00 a.m.	2:00 a.m.
Minnetonka Beach	5:15 a.m.	8:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Minnetrista **	5:15 a.m.	8:45 p.m.	none	none	none	none
Mound	5:15 a.m.	8:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Mounds View	5:15 a.m.	12:30 a.m.	6:45 a.m.	11:15 p.m.	8:00 a.m.	10:15 p.m.
MSP Airport	24HR	24HR	24HR	24HR	24HR	24HR
New Brighton	4:15 a.m.	1:45 a.m.	4:30 a.m.	1:45 a.m.	4:30 a.m.	1:45 a.m.
New Hope	5:00 a.m.	9:30 p.m.	6:00 a.m.	8:00 p.m.	7:30 a.m.	6:30 p.m.
Newport	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
North Oaks	5:15 a.m.	7:00 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
North St. Paul	5:00 a.m.	10:45 p.m.	5:15 a.m.	12:45 a.m.	8:00 a.m.	11:30 p.m.
Oak Park Heights	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Oakdale	4:45 a.m.	10:45 p.m.	5:30 a.m.	12:15 a.m.	8:00 a.m.	11:30 p.m.
Orono	5:15 a.m.	8:45 p.m.	6:45 a.m.	9:15 p.m.	8:00 a.m.	7:15 p.m.
Osseo	5:15 a.m.	11:00 p.m.	8:00 a.m.	7:00 p.m.	8:00 a.m.	7:00 p.m.
Pine Springs	6:00 a.m.	6:00 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Plymouth	5:15 a.m.	10:45 p.m.	6:30 a.m.	9:45 p.m.	8:00 a.m.	7:45 p.m.
Prior Lake	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Ramsey **	5:15 a.m.	10:45 p.m.	none	none	none	none
Richfield	24HR	24HR	24HR	24HR	24HR	24HR
Robbinsdale	24HR	24HR	24HR	24HR	24HR	24HR
Rosemount	5:15 a.m.	7:15 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Roseville	4:15 a.m.	1:45 a.m.	5:00 a.m.	1:45 a.m.	4:30 a.m.	1:45 a.m.
Savage	5:00 a.m.	11:30 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.

COMMUNITY	WEEKDAYS		SATURDAY		SUNDAY	
Shakopee	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Shoreview	5:15 a.m.	7:30 p.m.	6:45 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.
Shorewood	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
South St. Paul	5:00 a.m.	2:00 a.m.	6:15 a.m.	1:45 a.m.	7:15 a.m.	12:30 a.m.
Spring Lake Park	5:00 a.m.	12:30 a.m.	5:45 a.m.	11:30 p.m.	8:00 a.m.	10:15 p.m.
Spring Park	5:15 a.m.	8:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
St. Anthony	4:15 a.m.	1:45 a.m.	4:30 a.m.	1:45 a.m.	4:30 a.m.	1:45 a.m.
St. Louis Park	4:15 a.m.	2:15 a.m.	5:00 a.m.	2:15 a.m.	5:00 a.m.	2:15 a.m.
St. Paul	24HR	24HR	24HR	24HR	24HR	24HR
St. Paul Park	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Stillwater	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Sunfish Lake	5:15 a.m.	11:00 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Tonka Bay	5:15 a.m.	8:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Vadnais Heights	5:15 a.m.	7:00 p.m.	7:00 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.
Wayzata	5:15 a.m.	10:30 p.m.	6:45 a.m.	9:15 p.m.	8:00 a.m.	7:30 p.m.
West St. Paul	5:15 a.m.	1:45 a.m.	5:45 a.m.	1:45 a.m.	7:00 a.m.	12:00 a.m.
White Bear Lake	5:00 a.m.	12:00 a.m.	5:15 a.m.	12:45 a.m.	8:00 a.m.	11:15 p.m.
White Bear Twp.	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Willernie	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.
Woodbury	5:15 a.m.	10:45 p.m.	6:15 a.m.	8:00 p.m.	8:00 a.m.	4:00 p.m.
Woodland	5:15 a.m.	6:45 p.m.	8:00 a.m.	4:00 p.m.	8:00 a.m.	4:00 p.m.

Effective February 22, 2013

Communities indicated with two asterisks (**) have limited service areas.

Attachment K
No-show Appeal Policy

Metro Mobility No-Show Policy

- 1.) **No-Show Warning:** After receiving 3 no-shows in a 30-day period a customer is mailed a warning letter stating that a 4th no-showed ride in the same 30-day period will result in a suspension of service.
- 2.) **No-Show Suspension:** Upon committing a 4th no-show a suspension letter is mailed indicating that the customer will be suspended in two weeks for a period of 30, 45, 60, 90, or 120 days depending on the number of previous no-show suspensions the customer has served in the last 365 days. The first and second suspensions in a rolling 365-day period are 30 days long, the 3rd 45 days long, the 4th 60 days long, the 5th 90 days long, and the 6th 120 days long. The letter mentions that the customer can call the MMSC to appeal any incorrect no-shows or explain any extenuating circumstances. The Customer must contact the MMSC before the start of the suspension to initiate an appeal.
- 3.) **Appeal Step 1:** The Customer Service Specialist (CSS) in charge of investigating no-shows handles the initial calls and determines whether any of the no-shows were the result of a Metro Mobility error. If all no-shows are legitimate, the CSS may offer a one-time 30-day probationary period. Under this probation, if a customer successfully goes a full 30 days without committing a no-show the suspension will be waived. If the CSS's decision fails to satisfy a customer the appeal is routed to step 2.
- 4.) **Appeal Step 2:** The Metro Mobility Manager of Customer Service speaks with the customer and re-investigates the validity of any challenged no-shows. If all no-shows are found to be legitimate the Customer Service Manager may either offer a one-time lenience reducing the length of the suspension by half or, offering a one-time probationary period if it was not offered by the CSR at step 1. If the Customer Service Manager's decision fails to satisfy a customer the appeal is routed to step 3.
- 5.) **Appeal Step 3:** Metro Mobility's Senior Manager speaks with the customer and again investigates the no-shows and extenuating circumstances, employing leniency at his/her discretion if all no-shows are found to be legitimate. If the Senior Manager's decision fails to satisfy a customer the appeal is routed to step 4.
- 6.) **Appeal Step 4:** The same appeals committee that currently hears eligibility appeals will hear no-show appeals. The Senior Manager or Customer Service Manager will present to the committee the MMSC's no-show policy and the reasons behind it. The presenting manager will also share the specific results of the investigation into the validity of the no-shows in question and the customer's no-show history including any leniency granted to the customer in the past with regard to no-shows. The start of the suspension will be delayed until the committee notifies the customer and the Metro Mobility Service Center (MMSC) in writing of the outcome of the appeal.