



FEDERAL TRANSIT ADMINISTRATION

## **Pioneer Valley Transit Authority**

### **ADA Paratransit Compliance Review**

Final Report  
February 2017



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

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## Executive Summary

### Objective and Methodology

This report reviews Pioneer Valley Transit Authority (PVTA) complementary paratransit service in the Springfield, MA metropolitan area. It verifies whether PVTA meets the Americans with Disabilities Act (ADA) requirements 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 PVTA paratransit riders and local disability organizations
2. Site visit: a two-person review team observation of PVTA's handling of paratransit trip requests, scheduling and dispatching, eligibility applications and related documents (including appeals), and interviews with PVTA and contractor employees
3. Analysis and reporting: identification of deficiencies requiring corrective actions and suggestions of effective practices in complementary paratransit service

PVTA's complementary paratransit service includes the following positive program elements:

#### **Positive Program Elements**

- PVTA's paratransit service area extends beyond the minimum 3/4 mile fixed route corridors within its member communities.
- PVTA has a thorough process to review rider no-shows before considering service suspensions.

PVTA has the following administrative deficiencies that are easily correctable to bring its program into compliance with 49 CFR Parts 27, 37, and 38:

#### **Administrative Deficiencies**

- Certain letters for conditional eligibility improperly restrict service.
- PVTA does not offer eligibility for all visitors who may be eligible.
- PVTA's missed trip definition is not comprehensive.

PVTA needs to address the following substantive deficiencies to bring its program into compliance with 49 CFR Parts 27, 37, and 38:

#### **Substantive Deficiencies**

- PVTA does not monitor carrier-missed trips.
- PVTA has no standard for and does not monitor drop-off performance.

Please see Section 6 for a discussion of all 9 deficiencies. The Summary Table of Compliance Review Findings (following Section 6) lists all findings. PVTA must address all deficiencies within 60 days of receipt of this report.

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## 1 General Information

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

Grant Recipient:	Pioneer Valley Transit Authority (PVTa)
City/State:	Springfield, MA
Grantee Number:	1379
Executive Official:	Mary MacInnes, Administrator
On-site Liaison:	Josh Rickman, Manager of Operations and Planning
Report Prepared By:	The Collaborative, Inc.
Dates of Site Visit:	September 13–16, 2016
Review Team Members:	David Chia, the Collaborative, Inc. Bill Schwartz, the Collaborative, Inc.

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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 Purpose and Objectives**

This chapter discusses the purpose and objectives of an FTA ADA complementary paratransit compliance review and the review process.

### **3.1 Purpose**

Pursuant to 49 CFR §§ 27.19 and 27.123, as part of its oversight efforts, the FTA, through its Office of Civil Rights, conducts periodic reviews of fixed route transit and complementary paratransit services operated by its grantees. Compliance with all applicable requirements of the Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. 12101–12213) including the DOT’s ADA Regulations is a condition of eligibility for receiving Federal financial assistance.

### **3.2 Objectives**

The primary objective of this paratransit review is to verify whether a public operator of a fixed-route transit system that benefits from FTA funding is meeting its obligations under the ADA to provide paratransit as a complement to its fixed-route service. This review examines the policies, procedures and operations of the transit system’s complementary paratransit service concerning service provision, including origin to destination service; eligibility, including the process used to determine who is eligible for the service; receiving and resolving complaints; and meeting the complementary paratransit service criteria as specified in 49 CFR § 37.131.

The review team will observe dispatch, reservations, and scheduling operations and analyze service statistics, basic service records, and operating documents. To verify the accuracy of the public operator’s reported information and evaluate its methodology, the review team will also conduct its own independent analysis of sample data. In addition, FTA will solicit comments from eligible riders and from local disability organizations.

This report will summarize findings and advisory comments. Findings of deficiency require corrective action and/or additional reporting. Advisory comments are statements detailing recommended or suggested changes to policy or practice to ensure effective practices under the ADA.

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## 4 Introduction to PVRTA

The Pioneer Valley Transit Authority (PVRTA) provides fixed route and demand responsive service in 24 member communities in western Massachusetts. PVRTA began in 1974 and, with the exception of the MBTA in Boston, is the largest regional transit authority in Massachusetts. An advisory board comprised of representatives from each member community oversees PVRTA.

PVRTA's administrative offices are located at 2808 Main Street, Springfield, MA. PVRTA contracts with Springfield Area Transit Company to operate fixed route service and with Valley Area Transit Company to maintain its entire vehicle fleet. It contracts with Hulmes Transportation Services, Ltd. (Hulmes) to provide paratransit service. The primary garage and vehicle maintenance facility for fixed route service is adjacent to the Springfield administrative offices. Paratransit operations take place at a Hulmes facility at 80 First Avenue, Chicopee, MA.

PVRTA's fixed route fleet consists of 186 buses. In FY 2016 (July 2015–June 2016), PVRTA provided 12,154,880 fixed route unlinked passenger trips. It had an operating budget of \$46.68 million.



For more information on PVRTA services, go to [pvta.com](http://pvta.com)

### 4.1 Complementary Paratransit Services and Organizational Structure

Through its contractor Hulmes, PVRTA operates complementary paratransit service for individuals with disabilities who cannot use PVRTA's fixed route bus service. PVRTA also operates a separate demand-responsive service for seniors who live in its member communities (senior van service). PVRTA oversees paratransit and manages ADA paratransit eligibility at its administrative offices. In addition to the main facility in Chicopee, Hulmes also has overnight parking in Northampton and Belchertown. Hulmes is responsible for the following activities:

- Accepting trip requests
- Scheduling trips
- Dispatching vehicles
- Delivering trips and collecting fares

Table 4.1 presents paratransit ridership and ADA denials for Fiscal Years 2013–2016. As shown, PVRTA had an increasing number of denials from 2013–2016. In August 2016, PVRTA separated its fleet into ADA and senior van service in order to remove any capacity constraints.

**Table 4.1 – PVRTA Paratransit Ridership and Denials**

<b>Fiscal Year</b>	<b>All Paratransit Trips</b>	<b>ADA Paratransit Trips</b>	<b>ADA Denials</b>
2013	312,022	199,068	54
2014	305,024	206,696	72
2015	310,133	209,926	113
2016	333,839	216,974	143

The paratransit operating budget in FY 2016 was \$8.59 million.

## 5 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.

### 5.1 Scope

The review focused on whether PVRTA's complementary paratransit service 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 the paratransit 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), 27.121(b), and 37.17)
- 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:
  - 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)

## 5.2 Methodology

FTA's Office of Civil Rights sent a notification letter to Ms. Mary MacInnes, PVTA Administrator, on May 17, 2016, confirming the dates for the site visit and asking PVTA to send information to the review team in advance of the visit. See Attachment A.

Before the visit, the review team examined the following service information:

- PVTA's description of how it structures its complementary paratransit service
- Public information describing PVTA's complementary paratransit service
- PVTA's standards or goals for on-time performance, trip denials, missed trips, complementary paratransit trip length, on-time performance, and telephone hold times
- The specification of all of these standards or goals in written policies and procedures as well as in any public documents

As FTA requested, PVTA provided the following information during the visit:

- Copies of completed driver manifests for recent months
- 36 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 addressing rider complaints and other incidents
- PVTA's complaint recordkeeping process
- A fleet roster of paratransit vehicles
- A listing of complementary paratransit drivers and their start dates
- Operating budgets, capital spending plans, and cost data

The PVTA complementary paratransit service site visit took place September 13–16, 2016. The visit began with an opening conference, held at 9 a.m. at the PVTA administrative offices. Attending the conference were:

- Josh Rickman, Director of Transit Operations and Planning, PVTA
- Iris Lawrence, ADA Coordinator, PVTA
- Robin St. Amand, Manager of Paratransit Services, PVTA
- Price Armstrong, Paratransit Analyst, PVTA
- Paul Anziano, President, Hulmes Transportation
- Sean Peindel, General Manager, Hulmes Transportation



- John Day, Program Manager for Policy and Technical Assistance, FTA (via telephone)
- Peggy Griffin, Civil Rights Office, FTA Region I (via telephone)
- Anita Heard, Equal Opportunity Specialist, FTA (via telephone)
- David Chia, Review Team Leader, the Collaborative, Inc.
- Bill Schwartz, Review Team Member, the Collaborative, Inc.

Following the opening conference, the review team met with PVRTA and Hulmes representatives to discuss the information sent in advance and PVRTA's complementary paratransit policies and procedures. The review team also discussed various topics, including PVRTA's compliance with DOT service criteria.

During the afternoon, the review team visited the Hulmes facility to observe call takers as they accepted trip requests. One team member began analyzing electronic data covering the selected sample week (August 8–14, 2016).

On the morning of September 14, a team member met with the ADA coordinator to review the eligibility determination process. He collected policies and sample determination letters and selected a set of client files to review. The other team member analyzed trip data for on-time performance and long trips. He also began review of the telephone performance data.

In the afternoon, the team returned to Hulmes to interview drivers and review operations data with Hulmes managers. A team member reviewed the telephone system and hold time performance. Team members interviewed paratransit drivers.

On September 15, a team member met with PVRTA's manager of paratransit services to discuss procedures for overseeing Hulmes, such as reviewing trips coded as no-shows. The manager also discussed PVRTA's no-show appeal process. A team member obtained sample complaint records and interviewed PVRTA staff to discuss the process for accepting, tracking, and responding to complaints. Team members met with PVRTA's chief financial officer to discuss the budgeting process for paratransit. In the afternoon, team members returned to Hulmes to interview the schedulers and observe dispatchers. Team members continued analyzing on-time performance, trip lengths, and telephone hold times.

On September 16, the review team met with Hulmes managers to discuss driver training and observe call takers accepting trip requests. The team returned to the PVRTA offices to analyze and tabulate the various data. They prepared for the exit conference, which took place at 2 p.m. at the PVRTA administrative offices. Attending the conference were:

- Mary MacInnes, Administrator, PVRTA
- Josh Rickman, Director of Transit Operations and Planning, PVRTA
- Iris Lawrence, ADA Coordinator, PVRTA
- Robin St. Amand, Manager of Paratransit Services, PVRTA
- Paul Anziano, President, Hulmes Transportation
- Sean Peindel, General Manager, Hulmes Transportation
- Alana Kuhn, FTA (via telephone)
- David Chia, Review Team Leader, the Collaborative, Inc.
- Bill Schwartz, Review Team Member, the Collaborative, Inc.

FTA provided PVRTA with a draft copy of the report for review and response. PVRTA offered no comments on the draft report.

## 5.3 Stakeholder Interviews

Before the site visit, the review team interviewed three complementary paratransit riders and six representatives of agencies/organizations that assist paratransit riders on eligibility determinations and other service issues. The following is a summary of comments the review team received:

**Eligibility.** No interviewees cited issues with the initial assessment or the recertification process. Several rider representatives cited an improved and “streamlined” certification process.

**Telephone access.** One rider reported consistent long hold times. A council on aging representative characterized the voicemail system as confusing. Another rider representative cited a lack of courtesy among some of the call takers.

**Denials.** No interviewees were aware of wait lists or trip denials for complementary paratransit service.

**On-time performance.** Three interviewees cited lower on-time performance on weekday afternoons. One representative thought that on-time performance had improved over the past year.

**Wait time policy.** No interviewees had concerns about drivers not waiting long enough for riders at pickup locations.

**Travel times.** All three riders mentioned long trips, sometimes longer than one hour and on occasion, two hours. The rider representatives did not cite long trips as a concern.

**Drivers.** Two riders mentioned “rude” drivers. The majority of the comments were complimentary. One representative believed there was a high turnover of drivers.

**Resolving Complaints.** Four individuals complained about service. None said that they were satisfied with the outcome. One interviewee said that the PVTa staff agreed with his complaint, but he did not know if changes resulted from his complaint.

## 6 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 PVTA's complementary paratransit system is provided, 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.

### 6.1 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 PVTA to provide comparable paratransit service for those certified to receive it.

### 6.2 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 the prohibition against unreasonable administrative burdens in PVTA's ADA paratransit eligibility process.

PVTA's ADA coordinator oversees and makes eligibility determinations for complementary paratransit. She conducts outreach throughout the service area at councils on aging (COAs), social service agencies, and nursing homes. She said that others learn about the paratransit service from current riders and Hulmes staff. She also informs seniors with disabilities of complementary paratransit service benefits, such as longer days and hours, a larger service area, and no constraints on service.

All first-time applicants have in-person interviews, most of which take place at PVTA's Springfield office. In addition, the ADA coordinator conducts interviews at four locations (COAs in Amherst, Holyoke, Northampton, and Wilbraham), at least once per month. Applicants can choose their interview locations. PVTA provides a free paratransit trip to the interview upon request.

## 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 PVRTA’s process to determine if individuals are ADA paratransit eligible.

PVRTA uses a written application, in-person interview, and medical information to make an eligibility determination.

At the time of the site visit, PVRTA had 2,575 individuals in its database certified as ADA paratransit eligible. During FY 2016 (July 2015–June 2016), PVRTA received 2,699 applications (including recertifications).

All first-time applicants complete the seven-page written application (see Attachment B) during the in-person interview, and provide the following information:

- Parts A-F. Name, contact information
- Part G. General information: Have you applied previously, is this a recertification, are you certified with another transit agency?
- Parts H, I. Information about applicant’s disability
- Part J. Experience using fixed route bus service
- Part K. Key abilities for traveling independently
- Part L. Barriers to using fixed route bus service
- Signature
- Authorization to obtain physician or professional verification: name and contact information of health care professional

While the ADA coordinator observes the applicant during the interview, she does not conduct a separate physical assessment. She reviews the completed application, explains the service (including the differences between ADA paratransit and PVRTA’s senior van service and answers questions.

PVRTA mails or faxes Professional Verifications (Attachment C) to medical professionals for almost all applicants, even if the ADA Coordinator is confident that an applicant will be eligible. She receives approximately 75 percent of completed verifications within a week and follows up on unreturned verifications after 15 days. If the information from the professional conflicts with the information that she collected from the application and interview, she calls the professional to resolve the conflict.

Based on the information collected and observations, PVRTA makes one of the following eligibility determinations:

- Unconditional
  - U1: riders can always use paratransit
  - U3: riders who use wheelchairs decide for each trip whether to use fixed route or paratransit
- Conditional
  - C1: riders decide when they can use fixed route or paratransit
  - C3: PVRTA applies conditions for when riders can use paratransit
- Temporary: 2–12 months
- Denial (not eligible)

Table 6.1 presents the distribution of determinations for FY 2016.

**Table 6.1 – PVRTA Eligibility Determinations, July 2015–June 2016**

Category	Number	Percent
Unconditional	1,580	58.5
Conditional	837	31.0
Temporary	226	8.4
Not eligible	56	2.1
Total	2,699	100.0

To assess PVRTA’s eligibility determination process, the review team examined a sample of 21 eligibility determination files. This included four determinations of unconditional eligibility, two determinations of temporary unconditional eligibility, five conditional eligibility determinations, and ten eligibility denials.

All determinations appeared reasonable. Four of the five applicants who received conditional eligibility were “C1,” which means that they decide when to use paratransit. For all applicants whom PVRTA determined not eligible, the information in their files supported the decision. Some of these applicants used fixed route buses. Some applied for paratransit service because they did not have bus service near their home addresses.

For the two applicants who received temporary eligibility, one received eligibility for two months; the other, 12 months.

For all individuals determined conditionally eligible, PVRTA relies on Hulmes call takers to enforce the conditions. While PVRTA’s paratransit software displays trip conditions in rider files, the software does not evaluate trips to determine if riders should or should not receive paratransit service for each trip. The review team observed that in practice, call takers do not check riders’ eligibility conditions when booking a trip request.

## 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 this requirement to have information in accessible formats. An advisory comment is made concerning PVRTA’s clarifying language in its ADA Paratransit Services Guide (Services Guide – see Attachment D).

The Services Guide (pages 27-28) states:

PVTA is required to make their communications and information available to people with disabilities through the use of accessible formats and technology (e.g., braille, large print, audio tape, computer disk, email, TDD/TTYs etc.) to enable customers and potential customers to obtain adequate information about transportation services and to schedule them...

All materials associated with the ADA complementary paratransit process (e.g., public information brochure, cover letter, application form, eligibility determination letter etc.) must be available in alternative formats so that eligible and potentially eligible customers can effectively apply for and use ADA complementary paratransit

This language does not explicitly state that PVTA will honor requests for accessible information. PVTA staff confirmed their process for providing materials and information in appropriate accessible formats.

**Advisory Comment:** An effective practice is for PVTA to clarify information about the eligibility process, including all aspects of paratransit service, and make it available in accessible formats upon request—without merely re-stating the regulatory requirements.

### Eligibility Determinations or Presumptive Eligibility Within 21 Days

**Requirements:** Under 49 CFR 37.125(c), if the transit agency has not made an eligibility determination on the 21st day following the submission of a complete application, it must treat the applicant as eligible on the 22nd day and have a process in place to provide service to the applicant beginning on the 22nd day and until the eligibility determination has been made. The transit agency's process must communicate the right to this presumptive eligibility to applicants so they are aware of their rights to schedule and use the service, beginning on the 22nd day.

**Discussion:** During this compliance review, no deficiencies were found with the requirement for PVTA to communicate an applicant's right to presumptive eligibility.

The Services Guide (page 3) states "Applicants will be notified of their eligibility determinations within 21 days of receipt of the completed application, which includes a medical professional verification. Temporary eligibility will be given if the process exceeds 21 days."

PVTA sends a letter to applicants explicitly stating it will provide complementary paratransit service within 21 days of eligibility if it has made a determination. The most common reason for determination delays is a delay in receiving the professional verification.

The review team examined a sample of 21 applicant files to calculate the number of days PVTA needed to make its determination. Twenty of 21 had determinations made within 21 days (a majority within 14 days). The one exception took 24 days.

### 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. 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 how PVTA documents its eligibility determinations. Certain letters granting conditional eligibility improperly restrict a rider's use of complementary paratransit. Other letters granting conditional eligibility improperly refer to a rider's home address as a potential eligibility condition.

PVTA's determination letters include the following required information:

- Name of the eligible individual
- Name of the transit provider
- Telephone number of the entity's paratransit coordinator
- Eligibility expiration date
- Conditions or limitations on the individual's eligibility
- Individual's need for personal care attendant (PCA)

All letters granting other than unconditional eligibility appropriately explain the applicant's right to appeal the decision.

Certain letters of conditional eligibility improperly restrict a rider's use of complementary paratransit by listing bus routes that the rider must use. For example, one letter includes the following language:

[Name of applicant] is to continue using the following city bus routes:

B6, B17, P20

Any trips you need to make that are not on these routes, you will be provided paratransit service for

This letter attempts to indicate that because certain PVTA routes serve applicants' home addresses, their use of complementary paratransit is limited to origins and destinations these routes do not serve. While PVTA's fixed route buses are fully accessible, it has not verified that all stops and all paths of travel leading to/from the stops are accessible. An appropriate condition on eligibility would include specific origin-destination pairs that PVTA has confirmed are accessible, e.g., Springfield Bus Terminal to Holyoke Mall on route P20.

In addition, PVTA sends letters of conditional eligibility to applicants who are unconditionally eligible but reside beyond 3/4-mile of a bus route. A letter to an applicant approved for conditional eligibility includes the following language:

Your current address is well outside the 3/4-mile zone. This means that although eligibility has been conveyed, it does NOT obligate or require the paratransit (van) system to travel outside the 3/4-mile zone to provide service. If it is done, it is merely as a courtesy, and may be eliminated at any time. IF PVTA decides to exercise the 3/4-mile radius zone policy, the transportation provider will not be able to provide services from your home address or to your home address. Arrangements will have to be made from the closest PVTA bus stop...

PVTA may remind an applicant of its service area, but this is not an eligibility condition; it is an operating policy.

**Corrective Actions and Schedule:** Within 60 days of the issuance of the final report, PVTA must revise letters for conditional eligibility so that they do not improperly restrict a rider's use of paratransit.

PVTA must also revise letters for conditional eligibility so that they do not imply that living beyond 3/4-mile of a bus route is a potential disqualification for 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 PVTA's process for recertifying ADA paratransit eligibility.



The eligibility term is three years for individuals receiving unconditional and conditional eligibility. The term for individuals with temporary eligibility varies depending on the nature of the disability. According to the Services Guide:

All customers, regardless of eligibility type, will need to re-apply for Paratransit service on or before the expiration date on their eligibility approval letter. Three to four weeks prior to the expiration date, PVTA will notify customers via U.S. Postal Mail of their recertification appointment. This letter will include the date, time, location and current certification expiration date. You may schedule a ride for this appointment, free of charge, with Hulmes Transportation at 413-739-7436, and please inform them that your appointment will run for about 45 minutes.

It is the customer's responsibility to notify PVTA (413-732-6248 ext. 214) when their condition changes. Often an individual's condition worsens and mobility aids are needed that were not needed when they were first certified for services.

If an individual misses his recertification appointment or does not schedule one, PVTA may extend eligibility until the individual attends an in-person interview.

If an individual has unconditional eligibility, PVTA does not require an in-person interview for recertification. A telephone interview is sufficient for these riders.

### **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, no deficiencies were found with the process or documents PVTA uses for applicants to appeal eligibility determinations. An advisory comment is made concerning the composition of PVTA's appeal committee.

If an applicant receives a determination other than unconditional, the applicant may appeal the decision. An applicant must request an appeal in writing within 60 days of the date of the determination letter. The appellant may request an in-person hearing. Appellants may attend the hearing with their representatives.

PVTA schedules appeal hearings at least once per month (as needed). At the time of the site visit, the appeal committee had three members: the PVTA claims manager, the Hulmes contract manager, and a transportation staff member of the Pioneer Valley Planning Commission. While such representation is acceptable, many transit agencies invite experts in specific disabilities to assist with appeal reviews.

The appeal committee submits its decision in writing. If the committee does not decide within 30 days of the appeal, then PVTA provides the appellant complementary paratransit service until the committee makes a decision.

During the 12 months before the site visit, PVTA had nine applicants appeal their initial determinations (all "not eligible"). Subsequent appeal reviews resulted in the following decisions:



- Upheld: two
- Changed to conditional: four
- Changed to unconditional: two
- Changed to temporary: one

According to PVTA's ADA Coordinator, new information provided during (or prior to) the hearing led to the seven changed determinations.

**Advisory Comment:** An effective practice for PVTA is to add experts to its eligibility appeal committee who can advise on mobility, cognitive, vision, and hearing disabilities, thus supporting committee reviews as appropriate.

### Complementary Paratransit for Visitors

**Requirements:** Under 49 CFR § 37.127(d) and (e), complementary paratransit service must be made available to visitors not residing in the jurisdiction(s) served by PVTA 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. The transit system 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, the transit system may require documentation of the individual's place of residence and, if the individual's disability is not apparent, of his or her disability. 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 PVTA's process to provide service to visitors. The Services Guide (pages 20-21) describes PVTA's policy:

Any visitor who presents ADA eligibility documentation from another jurisdiction will be provided service. We will accept a certification by the visitor that he or she is unable to use fixed route transit. The visitor will be provided 21 days of service within a 365-day period.

PVTA's policy does not account for visitors who do not have documentation of eligibility from another jurisdiction and if the individual's disability is not apparent, of their disability.

**Corrective Actions and Schedule:** Within 60 days of the issuance of the final report, PVTA must revise its process for visitor eligibility so that it accommodates visitors without eligibility from another jurisdiction. This includes visitors without an apparent disability who have documentation of their disability.

## 6.3 Types of Service

**Requirement:** Under 49 CFR 37.129(a), the transit agency's complementary paratransit service must be provided on an origin-to-destination-basis. The transit agency may determine through its local planning process whether to establish either door-to-door or curb-to-curb service as the basic mode of 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 PVTA's obligation to provide complementary paratransit service on an origin-to-destination-basis.

The base level of PVRTA paratransit is curb to curb. Assistance beyond the curb is available upon request. The Services Guide (page 13) states:

Drivers will assist customers upon request with boarding and exiting the vehicle and/or to and from the ground level exterior door of the building. Riders who require door to door assistance must call Hulmes only once to notify them that they are requesting the assistance which will be added to their client file. Drivers cannot escort customers past the ground floor of any building and are not allowed to enter residences

The review team confirmed this level of service during driver interviews.

In addition, the PVRTA website has a “Reasonable Modification” page that explains its policies. Riders may call, e-mail, or write PVRTA (via a downloadable form) to request a reasonable modification.

## 6.4 Service Criteria for Complementary Paratransit

**Requirement:** Section 12143(c)(3) of the ADA directed the Secretary of Transportation to establish minimum criteria to establish service criteria to be used when determining whether the service provided by paratransit is comparable to the regular fixed-route system. These criteria are contained in 49 CFR 37.131, and include service area, response time, fares, 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 the transit agency’s ADA paratransit system using these criteria as described below.

### Service Area

**Requirement:** Under 49 CFR 37.131(a)(1) all public operators of a fixed-route 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 public transit agency does not have the legal authority to operate in those areas. For entities operating a light rail or rapid rail system, the paratransit service area 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 PVRTA’s complementary paratransit service area. An advisory comment is made concerning the imprecise wording for the service area in the “Services Guide.”

PVRTA provides complementary paratransit throughout its 24 member municipalities, including areas beyond 3/4-mile of a PVRTA bus route. The Services Guide (page 1) states, “the PVRTA currently goes above and beyond this ADA requirement and provides paratransit services for all individuals residing within the geographic boundaries of the member community AND have been approved to utilize the service.” Rather than referring to “individuals residing within the geographic boundaries of the member community,” the Services Guide should refer to all origins and destinations in the communities.

PVRTA also provides ADA paratransit within 3/4-mile of its bus routes to communities that are not members. Callers may refer to the PVRTA maps that depict these non-member areas. However, the eligible addresses in non-member communities are not stored in the paratransit software.

**Advisory Comment:** An effective practice is for PVRTA to revise the wording in its Services Guide to not restrict service to “individuals residing” in its service area.

## Response Time

**Requirement:** Under 49 CFR 37.131(b), transit agencies must schedule and provide paratransit service to any ADA paratransit eligible person at any requested time on a particular day in response to a request for service made the previous day, 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 the transit agency may negotiate the pickup time with a caller prior to a trip being scheduled, it cannot require a rider to schedule a trip to begin more than one hour before or after the individual's desired departure time. Any greater deviation would exceed the bounds of comparability. The transit agency must have policies and procedures in place to ensure that schedulers and dispatchers do not adjust the rider's negotiated pickup time or the pickup window without the rider's consent.

Under 49 CFR 37.131(b)(4), if the transit agency proposes to change its reservations system, it shall comply with the public participation requirements equivalent to those of § 37.137 (b) and (c). The transit agency may permit advance 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, no deficiencies were found with PVTA's response time.

Call takers accept trip requests for complementary paratransit trips every day from 8 a.m. to 4:40 p.m. On the two days per year when call takers do not work (Thanksgiving and Christmas), PVTA accepts trip requests via voicemail up to 7 days in advance. They also accept same-day requests if capacity is available.

A caller may request either a pickup or drop-off time. During the call, PVTA accepts the trip as requested. Every day, usually 6–6:30 p.m., PVTA initiates automated calls to all riders who have trips scheduled for the following day. The recording states the 20-minute pickup window and provides a number to call to negotiate a different pickup time.

The review team examined the August sample week (3,832 trips), identifying 1,797 as trips with requested pickup times. Of these, PVTA scheduled pickup times within 15 minutes of requested times for 1,380 trips (77 percent). PVTA did not schedule any trips more than one hour before or after requested pickup times.

Between the afternoon of September 13<sup>th</sup> and the morning of September 16<sup>th</sup>, review team members spent five hours observing and listening to call takers accepting trip requests. They confirmed that:

- Riders may request trips 1–7 days in advance.
- Riders may ask for a pickup time or appointment (drop-off) time.
- Call takers do not negotiate times with riders.

## 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, no deficiencies were found in PVTA's complementary paratransit fare policy or its companion policy.

The base fare for PVRTA bus service is \$1.25. The fare for a trip with one transfer is \$1.50. For two transfers, the fare is \$2.75. For comparable paratransit trips, respective fares are \$2.50, \$3.00, and \$3.50. These paratransit fares are no more than twice the fares for the comparable fixed route trips and they comply with the regulations.

PVRTA's paratransit software automatically calculates the fare based on the origin and destination addresses.

Companions pay the same fare as the rider. If the companion is a child (age five or younger), the child does not pay a fare. PCAs do not pay a fare. In addition, individuals with an ID from one of the region's colleges do not pay a fare.

### 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 this requirement.

There is no mention of trip purpose in the Services Guide or the website. Call takers did not ask or record trip purpose when team members observed them taking requests for complementary paratransit trips.

### 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 availability of complementary paratransit service during all hours PVRTA operates fixed route service.

The Services Guide (page 4) explains the service hours for complementary paratransit:

PVRTA's paratransit program is required by ADA to operate the same days and hours as fixed route bus service. Days and hours of service vary community to community. Call the Hulmes Transportation Call Center toll-free at 1-866-277-7741 or (413) 739-7436 to inquire about hours of service for communities you may need to travel to/from. You can also find hours of service by community by visiting [www.PVRTA.com](http://www.pvta.com). You can find the hours of service under the "ADA Mobility Impaired" link under the "Getting Around" header. If you are traveling from two separate areas, your travel time is also determined by availability of fixed route services in both communities. Not all PVRTA member communities have the fixed route span of services.

The website links to a table listing service hours for each member community: weekday, Saturday, and Sunday (<http://www.pvta.com/media/pdfs/ADAServiceHoursUpdatedSeptember2016.pdf>). These service hours vary based on the span of fixed route service in each community.

### 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 restricting the number of trips for ADA paratransit eligible riders. PVTA does not limit the number of trips provided to a paratransit rider.

### **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.<sup>1</sup>

**Discussion:** During this compliance review, no deficiencies were found with this requirement.

The review team found no evidence of any waiting lists and did not observe call takers denying trip requests or placing any requests on waiting lists.

**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 PVTA's on-time pickup performance.

PVTA uses a 20-minute on-time window (0/+20) from the negotiated time and requires riders to be ready throughout the window.

Table 6.2 presents PVTA's reported on-time performance during FY 2016 using monthly data from its paratransit software. As shown, PVTA is not meeting its 95 percent minimum standard. This data reflects on-time performance when both ADA paratransit and the senior van service operated as a combined service.

**Table 6.2 – PVTA Paratransit Reported On-Time Performance (FY 2016)**

Month	On-Time Percentage	Month	On-Time Percentage
Jul-15	90.79%	Jan-16	87.48%
Aug-15	89.40%	Feb-16	85.35%
Sep-15	85.78%	Mar-16	85.65%
Oct-15	87.15%	Apr-16	84.83%
Nov-15	86.73%	May-16	85.17%
Dec-15	85.35%	Jun-16	84.42%

Using PVTA's paratransit software data, the review team analyzed 3,832 trips from the August 2016 sample week. Table 6.3 shows an on-time performance rate of 93.5 percent, including 15.4 percent of pickups occurring before the pickup time. Given the 20-minute pickup window, this reflects an adequate level of on-time performance.

<sup>1</sup> 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.

**Table 6.3 – On-Time Performance for 3,832 PVTA Paratransit Trips: August 8–14, 2016**

<b>Trips</b>	<b>Number</b>	<b>Percent</b>
Early	707	18.4%
In window (-0/+20)	2,876	75.1%
<b>Early or in Window</b>		<b>93.5%</b>
All late	249	6.5%
1–15 minutes late	212	5.5%
16–30 minutes late	27	0.7%
>30 minutes late	10	0.3%

### No Substantial Numbers of Trip Denials or Missed Trips

**Requirements:** Under 49 CFR 37.131(f)(3)(i)(B), the transit agency must provide ADA paratransit service without substantial numbers of trip denials or transit agency missed trips. A denial occurs whenever a transit system is unable to provide a trip on a next-day basis as requested by an eligible passenger between points within the 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) of the DOT ADA regulations, the transit system may negotiate pickup times with a passenger, but cannot require the passenger to schedule a trip to begin more than one hour before or after his or her desired departure time. If the trip cannot be arranged within this timeframe 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, deficiencies were found with this requirement. PVTA’s definition of a “missed trip” is not complete. An advisory comment is also made concerning the small but ongoing number of trip denials.

According to the Services Guide (page 19), a missed trip “is when the paratransit vehicle does not arrive before or during the 20 minute pickup window provided to the paratransit passenger.” This definition omits situations when a driver arrives and leaves before the pickup window begins, or when the driver arrives within the pickup window, but does not wait five minutes.

PVTA has had a small but persistent number of trip denials. In FY 2016, there were 143 complementary paratransit denials with monthly totals ranging from six to 17. In FY 2015, there were 113 denials, with monthly totals ranging from five to 15. In FY 2016, these denials comprised less than 0.07 percent of all complementary paratransit trip requests. All were beyond the 60-minute negotiating window, which the software counts as a denial. PVTA attributed these denials to its contractor incorrectly using the paratransit software when taking trip requests.

See Section 6.11 for a discussion of PVTA’s oversight of contractor-missed trips.

**Corrective Actions and Schedule:** Within 60 days of the issuance of the final report, PVTA must revise its definition of a missed trip to include a driver arriving and leaving before the start of the pickup window, or a driver arriving within the pickup window, but not waiting the full five minutes before departing.

**Advisory Comment:** An effective practice is for PVTA to require its contractor re-train its staff in the use of the paratransit software to avoid placing trip requests outside of the 60-minute negotiation window.

### No Substantial Numbers of Trips With Excessive Trip Lengths

**Requirement:** Under 49 CFR 37.131(f)(3)(i)(C), the transit agency must provide ADA 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 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, no deficiencies were found with PVRTA's definition of long trips or with its long-trip performance.

PVRTA defines as excessively long, any paratransit trips that are longer than comparable fixed route trips. To monitor travel times, PVRTA samples paratransit trips longer than 60 minutes and compares them to fixed route travel.

PVRTA has a large service area, and due to bus schedules and required transfers, many fixed route trips take far longer than via paratransit. The median paratransit travel time during the sample week was 21 minutes with just 3.4 percent of trips taking 61 minutes or longer. The review team did not identify any trips taking more than 20 minutes longer than via fixed route; most were far shorter via paratransit, some by more than an hour.

### **No Operational Patterns or Practices Limiting the Availability of Service to ADA Paratransit Eligible Individuals**

**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 both telephone and drop-off performance standards and reporting.

#### **Telephone Hold Times**

PVRTA's goal is to answer all calls within two minutes. As noted in the FTA Circular:

To evaluate their telephone performance, many transit agencies have established performance standards for telephone hold times. An optional good practice is to define a minimum percentage (e.g., X percent) of calls with hold times shorter than a specific threshold (e.g., 2 minutes) and a second (higher) percentage (e.g., Y percent) of calls with hold times shorter than a longer threshold (e.g., 5 minutes).

PVRTA provided the review team with monthly data showing average holds aggregated by hours, e.g., average hold time 8-9 a.m. in December 2015. However, as compiled, these reports do not identify patterns or maximum hold times, thus preventing the review team (or PVRTA) from identifying any time periods when telephone capacity is constrained. In addition, the reports do not enable PVRTA to measure adherence to its goal.

PVRTA's contractor has several cross-trained individuals capable of providing additional telephone capacity when needed. During its observations of call takers and dispatch, the review team did not observe instances when telephone lines appeared to be at full capacity.

See Section 6.10 for a discussion of deficiencies with respect to monitoring service private entities provide under contract.

### Drop-off Performance

PVTA does not have a defined window for drop-offs or a defined standard for drop-off performance. See Section 6.10 for a discussion of deficiencies with respect to monitoring service that private entities provide under contract.

Approximately 53 percent of the 3,832 trips during the sample week had appointment times. Of these, 123 trips (6 percent) were late, meaning that 94 percent took place before the required drop-off times. Only eight trips were more than 30 minutes early (0.4 percent).

**Corrective Actions and Schedule:** Within 60 days of the issuance of the final report, PVTA must revise its telephone reports to include metrics that analyze telephone performance ensuring hold times do not limit customer access. PVTA must establish a drop-off performance standard and analyze drop-offs regularly to ensure timely drop-offs for trips with appointment times.

## 6.5 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, no deficiencies were found with how PVTA provides subscription service.

PVTA offers subscription service to its complementary paratransit riders. According to PVTA's Services Guide (page 11):

Standing Orders/Subscription service is for PVTA customers who make a reservation to and from the same locations at least once per week. Call Hulmes to request that these trips be automatically scheduled, which eliminates the need to call individually for each trip. This is a service that PVTA provides that is not required under the ADA. Subscription service is subject to availability. Multiple no shows or late cancels may result in termination of the standing order.

Although PVTA's service does not have specific capacity constraints, the review team identified three capacity-related deficiencies in Section 6.4 (missed trip definition, telephone reporting information, and drop-off performance standard). Once PVTA implements the required corrective actions and reviews future performance reports, PVTA must limit subscription service to no more than 50 percent of the available trips at any given time if capacity is constrained.

## 6.6 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 systems to regard late cancellations as no-shows if and only if they have the same operational effect on the system as a no-show, generally within less than 1–2 hours of the scheduled trip time.

Under 49 CFR 37.125(h)(1), trips missed by riders for reasons beyond their control, including trips missed due to operator or transit system 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 appeals 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, no deficiencies were found with PVRTA's no-show verification process or with its policies and processes for no-show suspensions.

PVRTA, which implemented its current no-show and suspension procedures in place in 2015, charges a rider with a no-show for any of the following incidents:

- Rider is not at pickup point during the pickup window when vehicle arrives
- Rider cancels at the door or "waves away" the driver who arrives at the pickup point during the pickup window
- Rider cancels a scheduled trip less than one hour prior to scheduled pickup

Riders are subject to warnings or suspensions if they have 20 or more scheduled trips in a calendar month and are charged with no-shows for more than 15 percent of these scheduled trips. The first time this occurs within a calendar year, PVRTA warns in a letter that further no-shows can provoke a suspension.

The second occurrence in a calendar year of more than 15 percent no-shows out of 20 or more scheduled trips in a month can result in a service suspension of seven days. Subsequent occurrences can lead to longer suspensions, up to 28 days.

Before each potential suspension, PVRTA sends riders letters documenting the no-shows. Riders may appeal charged no-shows within 10 days of the date of the letter.

PVRTA staff is diligent in reviewing trip requests coded as no-shows for riders who may be subject to suspension for excessive no-shows. Each month, PVRTA's manager of paratransit services compiles a list of riders that have met the threshold for suspension (20 scheduled trips and more than 15 percent no-shows). She researches the coded no-shows to verify that they meet PVRTA's definition of no-shows. If the data and documentation is not definitive, she removes the charged no-show.

At the time of the site visit, since implementing its new procedures, PVRTA had not suspended any riders for excessive no-shows. Riders may appeal no-show suspensions the same way they appeal eligibility determinations.

## 6.7 Complaint Resolution and Compliance Information

**Requirements:** Under 49 CFR §§ 27.13(a) and 37.17(a), the transit agencies must designate at least one person to coordinate its efforts to comply with the nondiscrimination requirements contained in DOT ADA regulations.

Under 49 CFR §§ 27.13(b) and 37.17(b), the transit agency must adopt procedures that incorporate appropriate due process standards and provide for the prompt and equitable resolution of complaints. This includes sufficiently advertising to the public the process for filing a complaint. Public advertising will typically include the agency's website. The complaint procedures must be accessible to and usable by individuals with disabilities. Finally, a transit agency must promptly communicate its response to the complaint allegations, including its reasons for the response, to the complainant by a means that will result in documentation of the response.

Under 49 CFR § 27.121(b), the agency 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. Establishing these policies and procedures is the responsibility of the transit agency, not its contractors.

**Discussion:** During this compliance review, no deficiencies were found with PVRTA's advertising of contact information for filing complaints or with PVRTA's complaint resolution process, its communication with complainants, or its recordkeeping.

PVRTA categorizes and investigates ADA complaints using an internal recordkeeping system that includes detailed information on the complaint, dates of receipt, internal investigation milestones, and resolution communication (when contact information is available). Based on a review of ADA complaints recorded between July 2015 and June 2016, PVRTA resolves such complaints promptly (typically with one week) and equitably. Detailed records extend to 2011.

While PVRTA designates and identifies an ADA coordinator in published materials and on its website, the manager of paratransit services oversees ADA complaints. PVRTA provides complaint contact information on its website including title, mailing address, and telephone. PVRTA accepts complaints by mail, phone, fax, or through the website.

## 6.8 Nondiscrimination

**Requirement:** Under 49 CFR 37.5, the transit agency is prohibited from discriminating against an individual with a disability in connection with the provision of transportation service, or denying 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, no deficiencies were found with nondiscrimination. The review team examined complementary paratransit policies in comparison with fixed route policies and found no policies in conflict.

## 6.9 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 PVRTA's training for its own employees or with its contractors. An advisory comment is made regarding paratransit software training.

The review team interacted with employees who were appropriately trained.

Hulmes Transportation has developed separate curricula for the following positions:

- Field supervisors
- Reservationists
- Schedulers
- Dispatchers
- Drivers

Driver training includes 5 days of classroom and fieldwork followed by in-service training. The six drivers the review team interviewed described their training as adequate. All appeared appropriately trained and sensitive to the need to treat customers respectfully and courteously.

As discussed in Section 6.4 under Denials, PVTA had a small but persistent number of trip denials, most likely because call takers scheduled trips beyond the 60-minute negotiating window, which identifies trips as denials. PVTA attributed these denials to contractor misuse of the paratransit software when taking trip requests. Additional software training may be warranted.

**Advisory Comment:** An effective practice when using paratransit software is to ensure all users are fully trained in using the software, particularly when issues such as scheduling errors persist.

## 6.10 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 the requirement for PVTA to monitor its contractor (Hulmes Transportation) and ensure that Hulmes complies with the DOT ADA regulations.

PVTA has a goal of zero missed trips and denials. Its contract with Hulmes includes a \$50 penalty for each denial or missed trip. The contract also has an incentive of \$500 for each month that Hulmes has neither a missed trip nor denial. However, there is no simple way for PVTA to identify missed trips. The paratransit software does not have a code to identify a scheduled trip as a missed trip.

To record a missed trip, Hulmes dispatchers use the code for a no-show (either "cancel at door" or "not ready") and add notes for that trip. According to PVTA's manager of paratransit services, the only way to identify missed trips is to review the dispatcher notes of the no-shows, of which there are hundreds each month.

Neither Hulmes nor PVTA monitors telephone performance in real-time. As a result, Hulmes does not have the information to re-assign staff to assist the call takers during unexpected peak periods. In addition, while PVTA has a telephone standard of answering all calls within 2 minutes, it does not have data from its telephone system software to determine if Hulmes is meeting this standard.

PVTA does not monitor on-time drop-off performance.

**Corrective Actions and Schedule:** Within 60 days of the issuance of the final report, PVTA must begin to count missed trips and work with its contractor to minimize the number of missed trips.

PVTA must also develop a plan to collect data to enable it to determine if its contractor is meeting its standard for telephone hold times.

PVTA must also develop a standard for on-time drop-off performance and monitor its contractor's on-time drop-off performance.

## 6.11 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:** Not applicable. PVTA does not use another public entity for any portion of its paratransit service.

## 6.12 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 the requirement for PVTA to coordinate complementary paratransit service with other fixed route operators with overlapping or continuous service areas. An advisory comment is made regarding formal agreements for transfers with adjacent transit providers.

PVTA has bus routes that overlap with Franklin Regional Transit Authority (FRTA) routes, as shown in Table 6.4

**Table 6.4 – PVTA Bus Routes that Overlap with FRTA Bus Routes**

Community	PVTA Routes
Amherst	29, 30, 31, 33, 34, 35, 38, 40, 43, 45, 46
Deerfield	46
Northampton	39, 40, 41, 42, 43, 44, 48, 98, NE
Whatley	46

PVTA has internal procedures for PVTA complementary paratransit riders to transfer to FRTA fixed routes. However, they do not have a formal agreement, procedures, or a memorandum of understanding to coordinate their respective services if a complementary paratransit rider wants to transfer between the two services.

**Advisory Comment:** An effective practice is for PVTA to formalize an agreement with FRTA so riders can transfer between FRTA and PVTA complementary paratransit services.

## 7 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/Date
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		
4	Accessible information	37.125(b)	No deficiencies 1 advisory comment		
5	Eligibility determinations within 21 days	37.125(c)	No deficiencies		
6	Written eligibility determinations including specific reasons for denials or temporary or conditional eligibility	37.125(d)(e)	2 deficiencies	Certain letters granting conditional eligibility improperly restrict a rider's use of complementary paratransit. Other letters granting conditional eligibility improperly refer to a rider's home address as a potential eligibility condition.	60/April 2017 60/April 2017
7	Recertification of eligibility at reasonable intervals	35.125(f)	No deficiencies		
8	Administrative appeals process for denials and conditional eligibility	37.125(g)	No deficiencies 1 advisory comment		

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days/Date
9	Complementary paratransit for visitors	37.127	1 deficiency	PVTA's definition of visitor eligibility omits individuals without documentation from another jurisdiction who have an apparent disability and individuals without an apparent disability who have documentation of a disability.	60/April 2017
10	Types of service	37.129	No deficiencies		
11	Service area	37.131(a)	No deficiencies 1 advisory comment		
12	Response time	37.131(b)	No deficiencies		
13	Fares	37.131(c)	No deficiencies		
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		

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days/Date
20	No substantial numbers of trip denials or missed trips	37.131(f) (3)(i)(b) 37.131(3)(1)(b)	1 deficiency 1 advisory comment	Definition of a missed trip is incomplete.	60/April 2017
21	No substantial numbers of trips with excessive trip lengths	37.131(f) (3)(i)(c)	No deficiencies		
22	No operational patterns or practices significantly limiting service availability	37.131(f)	2 deficiencies	System-generated telephone reports are insufficient for measuring hold time performance. PVRTA does not have a standard for tracking on-time drop-off performance for trips with appointment times.	60/April 2017 60/April 2017
23	Subscription Service	37.133	No deficiencies		
24	No-show, late cancel and reasonable service suspension & appeal policies	37.125(h) (1)-(3)	No deficiencies		
25	Complaint Resolution & Compliance Information	27.13(a)(b) & 27.121	No deficiencies		
26	Nondiscrimination	37.5	No deficiencies		
27	Training	37.173	1 advisory comment		
28	Service under contract with a private entity	37.23	3 deficiencies	PVRTA is not monitoring missed trips. PVRTA is not properly monitoring telephone hold times. PVRTA is not monitoring on-time drop-off performance.	60/April 2017 60/April 2017 60/April 2017
29	Service provided by another public entity	37.21(b)	Not applicable		
30	Coordination of service	37.139(g)	No deficiencies 1 advisory comment		

**Attachment A**  
**FTA Notification Letter**  
**To Pioneer Valley Transit Authority**





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

Headquarters

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

May 17, 2016

Ms. Mary MacInnes  
Administrator  
Pioneer Valley Transit Authority  
2808 Main Street  
Springfield, MA 01107

Dear Ms. MacInnes:

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. The Pioneer Valley Transit Authority (PVTA) has been selected for a review of its ADA paratransit service to take place during the week of September 13-16, 2016.

The purpose of this review will be to determine whether PVTA is meeting its obligations to provide paratransit service as a complement to its fixed route bus service 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 the ADA complementary paratransit service, and an exit conference. The entire on-site portion of the review will be completed within four days. FTA has engaged the services of 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, with FTA participating by telephone.

We request an opening conference at **10 a.m. on Tuesday September 13, 2016**, to introduce the Collaborative team and FTA representatives to PVTA, including you or your designee, the director of PVTA's ADA Paratransit service, 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 Paratransit offices for the duration of their visit. Please let us know if you will designate a member of your staff to serve as PVTA's liaison with the review team and will coordinate the site visit and address questions that may arise during the visit.

So that we may properly prepare for the site visit, we request that you provide the information described in Enclosures 1 and 2. Enclosure 1 consists of items that the Collaborative must receive by **Monday August 1, 2016**. These materials should be forwarded to:

David Chia  
Senior Associate  
the Collaborative, Inc.  
122 South Street  
Boston, MA 02111  
617-338-0018 x17  
*dc@thecollaborative.com*

Enclosure 2 consists of items that the Collaborative team will review on site beginning on September 13, 2016 after the opening conference.

We request the exit conference be scheduled for **2 p.m. on Friday September 16, 2016**, to afford an opportunity for the reviewers to discuss their observations with you and your agency. We request that you or your designee, the director of PVRTA's ADA Paratransit service, the ADA coordinator, and other key staff attend the exit conference. The FTA Office of Civil Rights will make findings and will provide them to you in a draft report. You will have an opportunity to correct any factual errors before FTA finalizes the report. The Draft and Final Reports, when issued to PVRTA, will be considered public documents subject to release under the Freedom of Information Act, upon request.

PVRTA representatives are welcome to accompany the review team during the on-site activities, if you so choose. If you have any questions or concerns prior to the opening conference, please contact Anita Heard, Program Manager for this compliance review, at 202-493-0318 or at her e-mail address: *anita.heard@dot.gov*.

Thank you in advance for your assistance and cooperation as we undertake this process. We look forward to working with PVRTA staff.

Sincerely,

A handwritten signature in dark ink, appearing to read "J Day", with a long, sweeping horizontal stroke extending to the right.

John Day

Program Manager for Policy and Technical Assistance

cc: Mary Beth Mello, FTA Region I Administrator  
Margaret Griffin, FTA Region I Civil Rights Office

**Enclosure 1**

**The following information must be submitted to the Collaborative by Monday August 1, 2016.**

1. A description of how complementary paratransit service is structured and provided, including:
  - How trip requests/reservations are handled (by contractors?) and the address(es) where reservations are taken
  - How trips are scheduled (by contractors?) and the address(es) where scheduling is done
  - How dispatching is handled (by contractors?) and the address(es) of the central dispatch offices

Note that the Collaborative may contact you in advance to discuss this first question.

2. A copy any current operator contracts and any joint operating agreements for complementary paratransit with other public entities
3. A copy of the complementary paratransit operator manual, and copies of all rider guides, service brochures, or other documents that explain to the public and eligible riders how trips are requested and how service is provided
4. A description of the complementary paratransit service standards, including:
  - How is “on-time” performance defined and what is the goal for the percentage of trips to be provided within the standards? Are there standards and goals for both pickups and drop-offs?
  - What standards have been set regarding acceptable numbers or percentages of ADA trip denials?
  - What is the standard for acceptable trip length (time)? What is the performance goal?
5. Telephone call-handling performance standards for calls to reservation and dispatch: What are the standards for hold time (and/or call pickup) and abandoned calls? What are the goals for the percentages of calls to be handled within these standards?
6. Samples of driver manifests (described in Item #1 of Enclosure 2) and samples of records, reports, or tabulations of the complementary paratransit information (described in Item #2 of Enclosure 2)
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 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

## Enclosure 2

We request that the following information and/or assistance be available at the **beginning of the site visit**:

1. Copies of completed driver manifests for the most recent six-month period
2. The following 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
  - A listing of 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
  - A listing of trips longer than 60 minutes showing the customer name, origin, destination, day and time, if the customer was ambulatory or used a wheelchair, and the total time on-board
  - A listing of passenger no-shows and carrier missed trips for last month with negotiated pickup times and actual vehicle arrival and departure times
  - Telephone call management records (if available) showing hold times by hourly or half-hourly periods and day, total call volume, calls answered and abandoned
3. A list of complaints from the past year related to the ADA paratransit eligibility process, provision of complementary paratransit service or other complaints of discrimination. Provision of service complaints should include all complaints related to trip denials, missed trips, wait lists, trip caps, trip restrictions or limits, on-time performance, lengthy trips, phone capacity issues, etc. showing the customer's name, trip origin, date and type of complaint, and transit agency resolution (any corrective actions requested and taken)
4. The following ADA paratransit eligibility information:
  - Copy of a blank application form
  - Copies of eligibility guidelines and policies and any assessment or interview forms
  - Sample letters of all types of determination (unconditional, conditional, temporary, trip eligible (if applicable) and
  - Other letters related to receipt of applications, incomplete applications, eligibility appeals and other eligibility issues
  - Total number of ADA paratransit eligible individuals
  - Access to eligibility files and appeals records

## Pioneer Valley Transit Authority: ADA Complementary Paratransit Compliance Review

- 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
- 5. Any documentation, policies, procedures and correspondence related to service suspensions for missing scheduled trips (i.e., passenger no-shows and/or late cancellations)
- 6. Work shift assignments for reservationists (call-takers), schedulers, dispatchers, and drivers
- 7. Access to personnel records showing hire and termination dates for reservationists (call-takers), schedulers, dispatchers, drivers, and road supervisors
- 8. Current complementary paratransit fleet roster with vehicle type, make and model year and odometer reading, (designating whether the vehicles are accessible or inaccessible), numbers of accessible and inaccessible spares. For each accessible vehicle, please include the design load of the lift or ramp
- 9. Run structure (vehicles in service by hour of day)
- 10. Access to the most recent six months of daily vehicle pullout records showing late pullouts and closed runs
- 11. Vehicle availability reports for most recent six months
- 12. Copies of pre-trip vehicle inspection and preventative maintenance form(s)
- 13. Assistance with viewing and capturing parameters used in the scheduling software
- 14. Assistance with viewing and collecting data on vehicle run structures and peak pullout requirements
- 15. Subscription trips by hour
- 16. Training curricula for each type of complementary paratransit employee
- 17. Procedures for providing information and communication in accessible formats

**Attachment B**  
**PVTA Paratransit Application Form**

# Professional Verification

Application Date \_\_\_\_\_

**NOTE: This form must be completed by the licensed professional who sees this applicant on a professional basis regarding their disability (not a friend or relative).**

**PLEASE NOTE: All PVRTA regular fixed route buses are wheelchair lift equipped and have low floor kneelers for people who use a mobility aid or cannot climb stairs.**

The information you provide will enable us to make an appropriate determination for this applicant. All information will be kept confidential. Thank you for your assistance.

Applicant's Name \_\_\_\_\_ Date of Birth \_\_\_\_\_

Professional capacity in which you know the applicant \_\_\_\_\_

Physical and/or cognitive disability which prevents the use of the regular public bus:

\_\_\_\_\_

How does the disability prevent the use of a regular public bus? Please explain in detail.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Is this condition temporary? ☐ No ☐ Yes, for \_\_\_\_\_ months

Print Name \_\_\_\_\_ Signature \_\_\_\_\_

Date \_\_\_\_\_ Daytime Phone # \_\_\_\_\_ Fax # \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Professional License, Registration or Certification # \_\_\_\_\_ Expiration Date \_\_\_\_\_

**\*The individual mentioned above** is applying for PVRTA Paratransit services and has asked PVRTA to submit the Professional Verification form to your office. The form must be completed in its entirety by a licensed professional. By Federal regulations, ADA applications must be processed by the transit authority within 21 days, therefore, your prompt response will be most appreciated.

## **PLEASE RETURN THIS FORM UPON COMPLETION TO:**

**PVRTA Attn: Iris Lawrence, ADA Coordinator**

**Fax Number: (413) 746-1659 (Preferred)**

**Email Address: [iris@pvta.com](mailto:iris@pvta.com)**

**Office Tel: 413-732-6248 x 214**

**Address: 2808 Main St, Spfld, MA 01107**

The information contained in this facsimile message is intended only for the use of the individual or entity named above and is privileged and confidential. Any dissemination, distribution, or copying of this communication, other than to the individual or entity named above, is strictly prohibited. If you receive this facsimile communication in error, please notify us immediately by telephone and return the original message and copies to the sender named above. Thank you for your cooperation.

# **ADA APPLICATION INSTRUCTIONS**

- 1. Please complete the ADA application in its entirety.**
- 2. If you need additional doctor authorization forms besides the one that is already attached to the application, please request them.**
- 3. The ADA coordinator will review the application with you once you complete it. Please make sure you have your photo ID available and any additional paperwork you would like to include with your application at time of review.**





## ADA Paratransit Application Form

*Please note any information given on this application will be kept confidential and shared only with professionals involved in providing the paratransit service on an as needed basis.*

### A. Personal Information

Mr. ___ Mrs. ___ Ms. ___	Date of Birth:	Age:
Last Name:	First Name:	

### B. Current Residence

Street Address:		
Building #:	Apartment #:	Room #:
City:	State:	Zip Code:
Is this residence:		
<input type="checkbox"/> A Single or Multi-Family House		
<input type="checkbox"/> An Apartment or Condominium Complex	Name:	
<input type="checkbox"/> A Nursing or Assisted Living Facility	Name:	
<input type="checkbox"/> Other:		

### C. Mailing Address (if different from Residence)

Street Address or P.O. Box:		
Building #:	Apartment #:	Room #:
City:	State:	Zip Code:

## D. Contact Information

Primary Phone:	Alternate Phone:
TDD or Relay Number:	
Email Address:	
Language Ability: <input type="checkbox"/> English <input type="checkbox"/> Spanish <input type="checkbox"/> Other (specify)_____	

## E. Emergency Contact

Last Name:	First Name:
Relationship:	Agency if Applicable:
Primary Phone:	Alternate Phone:

## F. If someone assisted you in completing this form, please give the following information:

Last Name:	First Name:
Relationship:	Agency if Applicable:
Primary Phone:	Alternate Phone:

## G. General Information

Have you applied for ADA eligibility previously? <input type="checkbox"/> Yes <input type="checkbox"/> No			
Is this a recertification? <input type="checkbox"/> Yes <input type="checkbox"/> No			
Are you certified for ADA paratransit services by another RTA? <input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes:	Name of Service Provider:	State:	ID # (if applicable):

## H. Information About Your Disability

Please list by name what disabilities or health related conditions prevent you from using the public bus service:

If legally blind, please submit *Certificate of Blindness*.

If Developmental and/or Mentally Challenged is indicated, please attach a neuropsychological evaluation showing Full Scale Intelligent Quotient (FSIQ) or Mental Age if applicable.

Explain how your disabilities or health related conditions prevent you from independently using the public bus service:

Do you use any of the following when you travel?

☐ Manual Wheelchair

☐ Scooter

☐ Powered Wheelchair

☐ Cane

☐ Walker

☐ Communication Device

☐ Oxygen If yes:

☐ Crutches

☐ Tank ☐ Compressor

☐ Service Animal

☐ Respirator

☐ Medical Equipment

☐ Other, explain:

## I. Information About Your Disability (continued)

Is the disability or health related condition you describe:

☐ Permanent

☐ Temporary

Expected to last \_\_\_\_\_ months

☐ Unsure

Does your health condition or disability change from day to day in a way that affects your ability to use the public bus service?

☐ Yes

☐ No

☐ Sometimes

If "yes", please explain:

Are there times when a personal care attendant accompanies you when you travel?

☐ Yes

☐ No

☐ Sometimes

## J. Public Bus Service Experience

Do you ride the public bus? Have you ever ridden the public bus?

☐ Yes

If yes, how often and to what locations?

☐ No

If no, why don't you currently ride the public bus?

Travel training is a free service that teaches people how to use the public bus.

Would you like more information about this service?

☐ Yes

☐ No

## K. Functional Ability

Can you find your way to a public bus stop if someone shows you once?

☐ Yes

☐ No

☐ Sometimes

How far can you walk, using a mobility aid if necessary? (A block is about 500ft).

☐ Zero Blocks ☐ 1 Block ☐ 2-4 Blocks ☐ 4+ Blocks

Can you walk up/down a gradual incline?

☐ Yes

☐ No

☐ Sometimes

Can you see/detect curbs, ramps, and other drop off areas?

☐ Yes

☐ No

☐ Sometimes

How long can you stand and wait at a public bus stop?

Can you get on and off a public bus?

☐ Yes

☐ No

☐ Sometimes

If "no" please explain:

Can you ask for, understand, and follow travel directions?

☐ Yes

☐ No

☐ Sometimes

## L. Barriers

What barriers in the environment would make it difficult for you to use the public bus service?

☐ Lack of Curb Cuts

☐ Steep Hills

☐ Busy Street I Must Cross

☐ No Crosswalk Light

☐ No Sidewalks

☐ Sidewalks in Poor Condition

☐ Other, describe

Explain why the conditions indicated make it difficult to use the public bus service.

I understand that the purpose of this application is to determine if there are times when I cannot use the public bus service and must therefore use ADA paratransit services. I certify that to the best of my knowledge, the information in this application is true and correct. I understand that providing false or misleading information may result in reevaluation of my eligibility.

\_\_\_\_\_      \_\_\_\_/\_\_\_\_/\_\_\_\_

**PLEASE NOTE:**

PVTA has 21 days in which to make an eligibility determination after all necessary documentation is received, which includes face to face interviews.

Completed applications will be processed within 21 days of receipt.

You will be notified by letter of your eligibility determination for ADA Paratransit service. If you have not been notified with a decision or the status of your application within 21 days, please call and we will provide you with Paratransit services until your application is processed and a final determination of eligibility is determined.



**Attachment C**  
**Professional Verification**

Date: \_\_\_\_\_

## AUTHORIZATION TO OBTAIN PHYSICIAN OR OTHER PROFESSIONAL VERIFICATION

Please provide the following information for a physician or a professional who is familiar with your eligibility and is able to provide the needed information that would help determine eligibility for ADA paratransit service. (must not be a relative)

___ Physician	___ Health Care Professional	___ Rehabilitation Professional
Professional's Name:		
Agency:		
Office Address:		
City:	State:	Zip Code:
Phone #:	Office Fax:	
Applicant's Name:		Date of Birth:
Signature of applicant or guardian:		

### ADA Definition of Disability

Any person with a disability who is unable, as a result of a physical or mental impairment, and without the assistance of another individual, (except the operator of a wheelchair lift) to board, ride, or disembark from any public city bus.

Any person with a disability who has a specific impairment-related condition which prevents them from traveling to or from a bus stop on the public city bus system.

Architectural and environmental barriers such as distance, terrain or weather; do not, standing alone, form a basis for eligibility. However, a person may be eligible if the interaction of the disability and barriers prevent the person from traveling to or from the public city bus stop.



**Attachment D**  
**ADA Paratransit Services Guide**

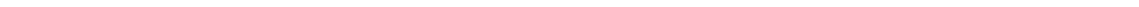


**ADA PARATRANSIT  
SERVICES  
GUIDE**



**Under the Americans  
With Disabilities Act of  
1990 (ADA)  
January 2016**

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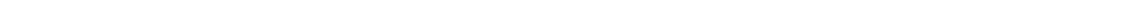
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## **PIONEER VALLEY TRANSIT AUTHORITY**

### **ADA Paratransit Services Guide**

The Pioneer Valley Transit Authority (PVTa) provides a shared-ride origin to destination Paratransit service in accordance with the Americans with Disabilities Act (ADA). Transportation is provided utilizing lift-equipped vans and a small number of ambulatory vehicles. Paratransit service is for individuals with disabilities which prevent them from riding the fixed route bus service. Customers who are unable to climb steps can enter vehicles utilizing the lift.

### **SERVICE AREA**

PVTa services 24 member communities. Under the ADA, transit systems are required to provide service within  $\frac{3}{4}$  mile of a fixed route. A fixed route is defined as a specific route with timed stops. The PVTa currently goes above and beyond this ADA requirement and provides paratransit services for all individuals residing within the geographic boundaries of the member community AND have been approved to utilize the service. If a fixed route enters an adjoining town that is not a member community, the paratransit vehicles will serve individuals who are  $\frac{3}{4}$  mile from the fixed route in that town.

### **PVTa Member Communities:**

Agawam, Amherst, Belchertown, Chicopee, E. Longmeadow, Easthampton, Granby, Hadley, Hampden, Holyoke, Leverett, Longmeadow, Ludlow, Northampton, Palmer, Pelham, South Hadley, Springfield, Sunderland, Ware, W. Springfield, Westfield, Wilbraham, Williamsburg



## ADA CERTIFICATION PROCESS

### How to Apply for ADA Paratransit Services

1. Call (413) 732-6248 ext 214 or toll free at (800)752-1638(ext. 214), to schedule an appointment for an in-person interview to complete the application.

Pioneer Valley Transit Authority  
ATTN: ADA Coordinator  
2808 Main Street  
Springfield, MA 01107

### Application Process

ADA Paratransit eligible individuals are:

- (1) Individuals who cannot independently board, ride, or disembark a fixed route accessible (lift-equipped) vehicle. This includes persons who cannot determine where to get on or off a fixed route.
- (2) Individuals with a specific impairment related condition which prevents them from getting to or from a boarding location or disembarking from such location.

PVTA determines eligibility for paratransit services utilizing the guidelines of the Americans with Disabilities Act.

Eligibility determinations will be made on an individual basis. There are three types of eligibility:

1. *Unconditional eligibility* – an individual is eligible for all trips on Paratransit service.

2. *Conditional eligibility* – an individual may be eligible for certain trips on Paratransit service.
3. *Temporary eligibility* – an individual is eligible for Paratransit service on a temporary basis. The length of time varies depending on medical necessity.

Applicants will be notified of their eligibility determinations within 21 days of receipt of the completed application, which includes a medical professional verification. Temporary eligibility will be given if the process exceeds 21 days. If you have any questions, call PVTa at (413) 732-6248 ext 214.

### **Re-certification Process**

All customers, regardless of eligibility type, will need to re-apply for Paratransit service on or before the expiration date on their eligibility approval letter. Three to four weeks prior to the expiration date, PVTa will notify customers via U.S. Postal Mail of their recertification appointment. This letter will include the date, time, location and current certification expiration date. You may schedule a ride for this appointment, free of charge, with Hulmes Transportation at 413-739-7436, and please inform them that your appointment will run for about 45 minutes.

It is the customer's responsibility to notify PVTa (413-732-6248 ext. 214) when their condition changes. Often an individual's condition worsens and mobility aids are needed that were not needed when they were first certified for services.

The general rule is that an individual is certified for a period of three (3) years for unconditional and conditional eligibility, and less time for temporary eligibility.

Failure to come in for your appointment will result in the termination of your services upon your certification expiration date including any standing order you may have with the van service. PVRTA will allow for one extension for your eligibility of services if you are unable to attend your initial recertification appointment. However, this will only apply for individuals who re-schedule their recertification in advance (minimum of one day before appointment). If the individual no-shows the recertification appointment a letter requesting an extension of services must be provided for consideration by the PVRTA, otherwise your eligibility for the services will be terminated. These individuals will need to re-apply for paratransit services.

### **HOURS OF ADA PARATRANSIT OPERATION**

PVRTA's paratransit program is required by ADA to operate the same days and hours as fixed route bus service. Days and hours of service vary community to community. Call the Hulmes Transportation Call Center toll-free at 1-866-277-7741 or (413) 739-7436 to inquire about hours of service for communities you may need to travel to/from. You can also find hours of service by community by visiting [www.PVRTA.com](http://www.PVRTA.com). You can find the hours of service under the "ADA Mobility Impaired" link under the "Getting Around" header. If you are traveling from two separate areas, your travel time is also determined by availability of fixed route services in both communities. Not all PVRTA member communities have the fixed route span of services.

### Holidays

No Service is provided on the following holidays:

Thanksgiving Day

Christmas Day

**Subscription Service/Standing Orders trips are not provided on holidays;** therefore you are responsible for reserving your trips on those days. For more information on subscription trips/standing order please see the scheduling options section. The following holidays you need to book your trips if you have a standing order:

New Year's Day, Martin Luther King Day, Memorial Day, Independence Day, Labor Day, Columbus Day and Veteran's Day

### **HOURS OF SENIOR VAN SERVICE**

Senior Service (60 years old+) trips are provided 8:00 AM - 4:30 PM Monday - Friday, on a space available basis with priority given to certified ADA passengers in accordance with federal law.

### **SCHEDULING ADA AND SENIOR VAN SERVICE**

#### **Reservations**

ADA Reservations can be made between the hours of 8:00 AM and 4:30 PM seven (7) days a week. Reservations may be made up to seven (7) days in advance, but no later than the previous day before 4:30 PM. Senior van service can be reserved Monday-Friday from 8:00 AM to 4:30 PM Monday through Friday. **If you are traveling to an appointment, be sure to tell the Reservation Staff what time you must arrive at your destination.** Then a correct pick-up time can be

determined. All service is “shared-ride”; your total travel time can allow for others to board and ride in the same vehicle. Your paratransit ride can at times take approximately the same amount of time a similar trip on the fixed route bus would take, and may not follow a direct route between your pick up and drop off location.

If you have multiple trips on the same day, they need to be scheduled at least sixty (60) minutes apart. This will allow for travel time and the utilization of the 20-minute window. This policy is in place to prevent the return trip from arriving before the original trip has been completed.

### **1 Hour Negotiation Rule**

Occasionally we may need to ask a customer to change the requested pick-up time in order to accommodate their request for a reservation. The ADA allows PVRTA to negotiate a pick-up with you that may be up to one hour before or after your requested pick-up time. Customers can request their estimated pickup or drop off times at the time of reservation. These times may change slightly during the auto scheduling performed at the end of the day.

**Example:** If you request a pick-up time of 9:00 AM, the negotiated time could be one hour before or after that time. Negotiating pick-up times with customers gives a better estimated arrival time.

### **20-Minute Window**

You will receive a phone call the night before your trip that will provide a 20-minute pick-up window. Customers should expect the vehicle to arrive within the pick-up window. Customers are expected to be ready at the beginning of the pick-up window; drivers will only wait five (5) minutes.

## **5 Minute Rule**

**Be Ready!** Drivers are allowed to wait only five (5) minutes for the customer to board the service vehicle, so it is very important for the customer to be ready and waiting at the beginning of the pick-up window. It is your responsibility to be ready to take your trip. If you cannot be located or choose not to start boarding within five (5) minutes, the driver may leave and continue to the next pick-up. The 5 Minute Rule doesn't start until the beginning of your pick-up window.

## **Early Pick-ups**

Sometimes your vehicle will arrive before the beginning of the window because of a cancellation or light traffic. If your vehicle arrives before the 20-minute pick-up window, you may wait to get on the vehicle until the start of your confirmed pick-up window, or you may get into the vehicle and leave right away. It's your choice. The 5 Minute Rule doesn't start until the beginning of your pick-up window.

## **Shared-Ride Service**

All service is "shared-ride"; your total travel time will allow time for other passengers to board and ride in the same vehicle. Your paratransit ride may take approximately the same amount of time a similar trip on the fixed route bus would take, and may not follow a direct route between your pick up and drop off location.

## **Trip Cancellations**

Trip cancellations are required no later than 1 hour before the start of the pick-up window. Trip changes are considered cancellations. Failure to cancel trips at least 1 hour before the scheduled pick-up will result in a late cancel (see No Shows).

## Senior Service

In addition to the federally required ADA paratransit service, the PVTa also provides Senior Service. Anyone 60 Years of age or older can call the reservation number, Toll Free at (866) 277-7741 or (413) 739-7436 at least one day in advance to schedule a ride. Let the Reservation staff know you are calling for the Senior Service; they will take your trip information to schedule the ride.

**Senior Service is available within the PVTa service area,**

**Monday thru Friday, 8:00 AM - 4:30 PM**

## Helpful Suggestions When Making Reservations

When calling to reserve a ride, have the following information ready:

- Your first and last name
  - Date when you want to travel
  - Telephone number
  - Pick-up address: number, street, suite number, city, zip, and entry code for any security entrances
  - Be specific about pick-up directions (Example: North Entrance, South Entrance, etc.)
  - Please make sure the location requested is accessible to lift vehicles, to ensure lift vehicles can enter and exit without backing
  - The house, apartment or mobile home number must be visible
- \* Reminder: it is not possible for our vehicles to be parked for long periods of time at the entrance. Our vehicles cannot block any other vehicle or customer traffic. If you are waiting for a vehicle at

an entrance, be sure you are ready and waiting at the beginning of your pick-up window

- Your requested pick-up or requested drop-off time
- Your requested return time if you want a round trip
- Where you want to go; number, street, suite number, city, zip, etc.
- If you will be using a wheelchair or other mobility device
- If you will be accompanied by a personal care assistant (PCA) and/or companion (including children), and if they use a mobility device
- Any other information the paratransit driver should know to help you travel
- Ask the reservationist to read back the information back to you

**When you call to schedule your trip, keep a record of the Reservation Staff person you spoke with, along with the date and time.**

Calls May Be Monitored for Quality Assurance
--

## **Scheduling Options**

When you call to schedule a ride please be aware of the following scheduling options as they may improve your control over your pick-up window.

### **A. Appointment**

An appointment trip can be adjusted up to 1 hour of the desired appointment time in addition to the 20 minute pick up window. Trips



with this scheduling option will not allow the trip to be adjusted that would result in arriving late to an appointment.

## **B. Return**

Trips can be adjusted up to 1 hour of the desired departure time in addition to the 20 minute pick up window. Trips with this scheduling option will not allow the trip to be adjusted that would result in the van arriving before the desired departure time.

## **C. No Earlier Than and No Later Than**

No Earlier Than and No Later Than are alternative scheduling options offered by PVRTA that allow customers to have more control over the one hour scheduling window. This is a service that PVRTA provides that is not required under the ADA.

- No earlier than – trip is reserved for riders who cannot or do not want to arrive to a destination before a specific time, this scheduling option could result in arriving late to a scheduled appointment time.

*Example: If the passenger cannot arrive before 8AM because the building is not open then they would request a drop off time "no earlier than 8AM." This will push the drop off time between 8AM and 9AM.*

- No later than – trip is reserved for riders who cannot or do not want to be picked up after a specific time, this scheduling option can result in passengers having to leave an appointment, work, etc. earlier than expected.

*Example: If the passenger cannot leave after 5PM because the building closes, then they would request a pick up time "no later*

*than 5PM." This will push the pick-up time between 4PM and 5PM.*

#### **D. Standing Orders/Subscription Services**

Standing Orders/Subscription service is for PVTa customers who make a reservation to and from the same locations at least once per week. Call Hulmes to request that these trips be automatically scheduled, which eliminates the need to call individually for each trip. This is a service that PVTa provides that is not required under the ADA. Subscription service is subject to availability. Multiple no shows or late cancels may result in termination of the standing order.

#### **PVTa CUSTOMER SERVICE CENTER**

PVTa welcomes your compliments, complaints, and suggestions. We are committed to using customer input as a tool to improve service quality. All comments may be submitted by mail, phone, fax, or through the PVTa website.

Pioneer Valley Transit Authority  
ATTN: Customer Service Manager  
1341 Main Street  
Springfield, MA 01103  
Phone: (877) 779-7882  
Phone(local): (413) 781-7882  
Fax: (413) 788-7272  
[www.PVTa.com](http://www.PVTa.com)

## **Service Complaints**

If you experienced a problem with a specific ride, you may wish to file a formal service complaint. All formal complaints are investigated and receive responses.

To file a formal service complaint, customers can contact the Customer Service Office or online at [www.pvta.com](http://www.pvta.com). Please provide the following information:

- Rider's name, address, and telephone number
- Date and time of the incident
- Details of the incident

PVTA is committed to protecting the confidentiality of its riders. Anonymous service complaints, however, cannot receive responses.

When a customer submits a complaint via email, the PVTA Customer Service Manager reviews the complaint and sends the customer a response within 24 hours of receiving the complaint. This indicates receipt of the complaint.

The contractor of the paratransit service is provided 6 calendar days to review the complaint and provide any supplementary information to determine the validity of the complaint.

Feedback that is escalated due to severity of complaint or security issues will be sent to PVTA for review. PVTA will provide a custom letter to the individual and state any service changes or scheduling arrangements made in response to the incident. Complaints of this magnitude must also be reviewed within 6 calendar days.

## RIDING PARATRANSIT SERVICE

### Door-to-Door Service

Drivers will assist customers upon request with boarding and exiting the vehicle and/or to and from the ground level exterior door of the building. Riders who require door to door assistance must call Hulmes only once to notify them that they are requesting the assistance which will be added to their client file. Drivers cannot escort customers past the ground floor of any building and are not allowed to enter residences

**Customers who cannot travel independently or enter/exit a facility should be accompanied by a Personal Care Attendant (PCA). This service is not provided by PVTa and is the responsibility of the customer. PCAs travel free with the customer but must be picked up and dropped off at the same location as the customer. If the customer intends to have a PCA accompany them, they must inform the Customer Service Representative when the transportation is scheduled to guarantee space on the vehicle.**

### Wheelchairs/Mobility Aid

More than 95% of the paratransit fleet is lift equipped. Individuals requiring a lift for their trip are assigned vehicles with the appropriate equipment. If an individual would like to use the lift they ask the driver.

The driver must be able to safely secure the mobility device. Customers who use a 3-wheeled scooter may be asked to transfer to a regular seat. These types of chairs are difficult to secure. However, the choice to transfer to a regular seat is the discretion of the customer.

The American Safety Council recommends that customers in wheelchairs board by backing onto the lift for safety purposes.

## **Use of Lift and Ramps by passengers**

Any individual can request use of the lift or the ramp. An individual does not need to have a mobility device or mobility impairment to utilize that equipment.

## **Transporting Individuals using Oxygen, Respirators and concentrators with Oxygen**

Any individual who needs to use oxygen, respirators or concentrators with Oxygen are welcome to bring those devices on both paratransit and fixed route vehicles.

## **Disruptive Behavior Policy**

PVTA has established an administrative process through which individuals who engage in violent, seriously disruptive, or illegal conduct can be suspended or prohibited from using PVTA service.

## **Transporting Children**

- ADA eligible children must pay the full fare and must be accompanied by an adult.
- Children, age 5 and over, traveling as companions must also pay the full fare.
- Children under 5 years old or who weigh less than 40 pounds must be secured in an approved child safety seat provided by the customer.
- Strollers must be collapsed to fit between the seat and the customer. Non-collapsible strollers are prohibited.
- Children capable of sitting on their own must sit in a seat.

## **Transporting Animals**

- Service animals are welcome and ride free-of-charge.

- A disruptive animal is subject to suspension of service.
- Service animals must sit on the floor or on the passenger's lap. They may not occupy a passenger seat.
- Passengers must be in control of their service animals at all times while on the vehicle.

### **Inclement Weather**

In the event of severe weather, including snow, ice, flooding, etc., the ability to provide transportation may be hampered. If you do not need to travel on those days, please call the reservation office to cancel your trips in a timely manner. Every effort will be made to provide transportation but safety considerations may prevent trips being provided.

### **No Show Policy**

It is the responsibility of the customer to utilize Paratransit service in a responsible manner. Customers not using the service responsibly will be subject to suspension from Paratransit service. If the customer receives a valid no-show at their pick up location, Hulmes Transportation will document the trip as a no show; any remaining trips scheduled for that service day will remain. Hulmes Transportation will attempt to contact the individual to verify if the remaining trips are needed. If Hulmes is unable to contact the customer please be aware that multiple no shows may occur.

Following is a list of incidents that would result in a no-show being charged.

## No-Show

A customer who is not at the scheduled point of pick-up during the 20-minute window in order to board within five minutes of the vehicle arriving.

## Cancel at Door

A customer who cancels at the door or “waves” away the driver who has arrived at the scheduled pick-up time and location. This is considered a no-show as the vehicle arrived at the scheduled pick-up.

## Late Cancel

When the customer calls to cancel a previously scheduled trip less than one (1) hour prior to their scheduled pick-up. This is considered a no-show as the vehicle is already in route for the pick-up. The only exception to this rule is for trips that are scheduled prior to 9:00 a.m. when there is no staff to receive the cancellation.

## No Show Suspension Policy

All passengers who have 20 or more trips in a calendar month and no show more than 15% of those trips during that month will be subject to a warning or suspension. The average no show rate for PVTa paratransit customers is 4.4%. The PVTa will use 15% as the threshold for assessing this penalty to avoid penalizing the average PVTa paratransit rider. *For Example: If a passenger takes 30 trips in one month and no shows 5 of them, they will be in violation. As no showing 5 trips out of 30 would result in no showing 16.67% of their total trips.*

## **Notification Process and Suspensions**

Each passenger no show occurrence will be reviewed at the end of each calendar month for excessive no show policy violations. Warning or suspension letters will be sent to all passengers in violation of the policy. Each letter will identify the dates of each violation from the previous month as well as the dates when the passenger's service will be suspended. If notification must be made in an alternative accessible format, please contact our office(413-732-6248 ext. 214). Warning letters and an appeal form with instructions will be mailed to the customers using the following timelines:

### ***Letter #1***

A warning letter is sent when a passenger violated the no show policy for the first time in a calendar year. The mailing will include a copy of the no show policy, with reference to potential suspension if behavior continues.

### ***Letter #2***

Sent certified when a passenger violated the no show policy for a second time within the calendar year. The individual will be suspended from service for a period of 7 Days.

### ***Letter #3***

Sent certified when a passenger violated the no show policy for a third time within the calendar year. The individual will be suspended from service for a period of 14 Days.

### ***Letter #4***

Sent certified when a passenger violated the no show policy for a fourth time within the calendar year. The individual will be suspended from service for a period of 21 Days.



## **Letter #5**

Sent certified when a passenger violated the no show policy for a fifth (and subsequent violations during the calendar year) time within the calendar year. The individual will be suspended from service for a period of 28 Days.

## **Customer Responsibilities**

The PVRTA realizes there may be times when a no-show is charged in error. We need your help to ensure these charges do not become part of your permanent ridership history. You can help by following the procedures listed below:

- It is the responsibility of the customer to cancel all rides not needed within one (1) hour of the scheduled pick-up window by calling Dispatch at Hulmes Transportation at 413-739-7436.
- It is also the responsibility of the rider to inform the PVRTA at 413-732-6248 Ext 214 of address changes, changes in emergency phone numbers or any other information regarding accessibility needs or changes.

By following the above listed guidelines, customers can maintain a good ridership history. We all share the responsibility to help improve the service.

Customers can help ensure their trip runs smoothly by being ready and waiting for each scheduled trip for the entire 20-minute window. A service vehicle is only allowed to wait five (5) minutes and the customer must be ready to board the vehicle as soon as the driver arrives within the window.

## **No Show Appeal Process**

Customers have ten (10) calendar days from the date the letter is mailed to address any no-show they feel was charged in error. Customers must address no-shows in a timely manner. After the ten (10) days have elapsed without request for an appeal, the no-show(s) in question will become part of the customer's permanent ridership history and cannot be appealed at a later date

## **Excessively Long Trip**

A PVRTA paratransit passenger trip is considered to be excessively long if the trip length is longer than the comparable fixed route time, to include time it takes to walk to a bus stop, transfers and walk to one's destination. PVRTA samples paratransit trips each month and compares the ride time versus the time it would take the individual to use a fixed route vehicle using the parameters above.

## **Missed Trip**

A missed trip is when the paratransit vehicle does not arrive before or during the 20 minute pickup window provided to the paratransit passenger.

## **PARATRANSIT CUSTOMER ACCOMMODATIONS**

### **Personal Care Attendants**

PCAs traveling with a customer must be able to provide assistance to the customer. PCAs must be picked up and dropped off at the same location as the customer. In most cases, those individuals listed below will not be considered a PCA:

- Children under the age of 6 are not considered a PCA, as children under the age of 6 must be accompanied on the fixed route bus.

When it is noted that a customer cannot be left alone, PVRTA will contact the customer (or caregiver) to determine what difficulties they may be experiencing. If suitable arrangements cannot be made to ensure the customer will have a caregiver waiting at the drop-off location, the customer will be notified PVRTA will be unable to transport them without the assistance of a PCA. Service could be suspended for those customers who have been notified of the need to travel with a PCA and continue to try to travel without a PCA present. The major concern is the well-being of the customer having difficulty after the driver leaves which could create a safety hazard for them. PVRTA is committed to providing our customers with the safest transportation possible.

### **Companions**

Customers may have one (1) companion accompany them. If you will be traveling with a companion, you must notify the reservationist at the time you schedule your ride. Companions are charged the same fare as the customer and must be picked up and dropped off at the same location. Additional companions can travel with a Paratransit customer on a “space available” basis and will pay the same fare as the customer.

### **Visitors**

Any visitor who presents ADA eligibility documentation from another jurisdiction will be provided service. We will accept a certification by the visitor that he or she is unable to use fixed route transit. The visitor will be provided 21 days of service within a 365-day period.

Any restrictions on their ADA eligibility in their residence city will be enforced here. For example, if the individual’s eligibility states they can use the service only in winter months, they would not be eligible here for service during summer months.

If a visitor needs services beyond the 21 days in a 365 day period, the individual will be required to apply for Paratransit eligibility locally.

### **Parcels & Packages**

Passengers are limited to what they can carry themselves on and off the vehicle in one trip, or they may request assistance.

Riders who require assistance with their bags/parcels must call Hulmes only once to notify them that they are requesting the assistance which will be added to their client file. Drivers are only required to assist with up to 3 standard size carry-on bags with a combined weight not to exceed 25 lbs.

### **TRAVEL TRAINING**

PVTA offers Travel Training for seniors and people with mobility impairments who are motivated to learn how to safely and independently use the fixed route system.

Travel Trainers provide personalized, one-on-one instruction which takes each trainee's unique needs and abilities into account. Sessions are primarily field-based and can focus on destination travel (how to get to a specific destination and back) or general orientation (how to use fixed-route buses). Trainees select their travel destinations which typically include: work, medical appointments, schools, shopping malls, and other recreation sites.

Travel Training is self-paced and is conducted in a series of steps from initial one-on-one instruction to the gradual fading of trainer assistance leading to independent travel. An instructor will stay with participants until they feel comfortable and confident riding the bus.

Travel Skills: Trainees who successfully complete one-on-one training will be able to travel to and from their destination and do the following:

- Arrive on time and safely at their bus stop
- Pay fares, via cash or pass, and request a transfer (if applicable)
- Identify, board, and disembark from the bus
- Use ID card appropriately
- Understand how to gather information
- Manage an unexpected situation
- Demonstrate appropriate behavior and bus etiquette
- Cross streets independently and safely
- Be aware of how to interact with strangers

Costs: Travel Training is provided free-of-charge except for the trainee's bus fare while training is taking place.

Benefits of Travel Training:

- Enhances freedom, mobility and independence
- Provides access to safe and low-cost transportation
- Increases self-confidence
- Promotes healthy living by helping people stay active in the community

Eligibility – participants must:

- Have a residence and destination on or near a PVRTA bus route
- Be able to get to and from a bus stop
- Be 13 years-of-age or older
- Meet agency admission criteria
- Successfully complete a pre-mobility training assessment

Contact Us: For further information please contact PVRTA's Mobility Services Coordinator at (413) 732-6248 ext. 235.

## **CUSTOMER RESPONSIBILITIES**

PVRTA realizes there may be times when a no-show is charged in error. We need your help to ensure these charges do not become part of your permanent ridership history. You can help by following the procedures listed below:

- Inform PVRTA of address changes, changes in emergency phone numbers or any other information regarding accessibility needs or changes.
- Read all sections of the Information Brochure carefully.
- Make reservations at least one day in advance.
- Be at pick-up locations on time.
- Provide entry if the pick-up address is located inside a gated community or other place with special access. If a vehicle is unable to enter the pick-up area and the rider fails to meet the vehicle, the rider will be considered a "no show" for the trip.

- Call to inquire if the vehicle has not arrived by the end of the “20-minute window”.
- Call to cancel unneeded rides to avoid “no shows”.
- Pay the correct fare in cash or tickets (drivers do not make change).

\* You will not be transported if the fare is not paid prior to leaving your pick-up location.

- Wear seat belts.
- Avoid distracting the driver or other inappropriate behavior that would negatively impact other passengers.
- Maintain wheelchairs or other mobility aids in a safe condition according to manufacturer’s specifications.
- Expect “shared-ride” service; others may be picked up after, or dropped off before you reach your destination.
- Maintain acceptable standards of personal hygiene.
- Follow these common rules of courtesy
  - No eating, drinking or smoking on board.
  - No riding under the influence of alcohol or illegal drugs.
  - No littering in the vehicle.
  - No physical abuse of another customer or driver.
  - No operating or tampering with any equipment on the Paratransit vehicle.
  - No radio or other sound generating equipment is to be played aboard the vehicles without the use of a headset.
  - No willful destruction of vehicles.

Customers who violate these rules of conduct are subject to penalties up to and including suspension of service.

## **DRIVER RESPONSIBILITIES**

- Adhere to the same standards of common courtesy and personal hygiene as those required of the riders.
- Treat riders with courtesy.
- Wear a uniform and an ID badge.
- Provide door-to-door service.
- Operate the vehicle and lift in a safe manner and safely secure wheelchairs on the vehicle.
- Stay within the “line-of-sight” of their vehicle if riders are aboard.
- Collect the fare listed on their schedule.
- Go only to the destinations listed on the manifest or as notified by the dispatcher.
- Offer assistance to riders

Assistance includes:

- Get out of the vehicle and let you know they have arrived.
- Offering ambulatory passengers a steadying arm or other appropriate guidance or assistance while getting into the vehicle.
- Helping individuals in wheelchairs to maneuver onto the lift.
- Ensuring all riders are appropriately secured.



**Drivers are not allowed to:**

- Enter the rider's residence or go past the lobby of a public building.
- Leave passengers in the vehicle unattended.
- Perform any personal care assistance such as assisting riders to dress.
- Smoke, eat, or drink in the vehicle.
- Use a cell phone for personal calls, play loud music, or wear headphones.
- Be rude or harassing to passengers.
- Take information from the rider about cancellations or changes in reservations.
- Accept tips, lift or carry riders, or carry wheelchairs up and down steps.

All drivers are trained in first aid but they are not medical technicians. If there is a medical or health emergency on-board, such as a rider having a seizure or a dialysis patient bleeding, the driver will pull over, call 911, and wait for trained help.

**CAREGIVER RESPONSIBILITY**

Some riders are mentally or cognitively impaired or have severe memory problems such that they cannot be safely left on their own at either the pick-up point or the drop-off point. It is the responsibility of the rider's caregiver or family to clearly identify these riders to PVRTA so that PVRTA can inform the driver and take appropriate precautions. However, the driver cannot act as an attendant for these riders.

Cognitively impaired riders will be allowed to travel without an attendant only as long as they exhibit safe behavior in the vehicle.

An attendant or caregiver must be present at the pick-up point and at the drop-off point for riders who cannot be left alone. If a responsible attendant or caregiver is not present when the driver attempts to pick-up or drop-off these riders, it can seriously disrupt the driver's schedule. If PVRTA paratransit encounters absences of an attendant or caregiver, service to the rider may be suspended and the situation reported to adult protective services.

## **ACCESSIBLE INFORMATION AND TRANSLATION SERVICES**

### **Accessible Format**

PVRTA is required to make their communications and information available to people with disabilities through the use of accessible formats and technology (e.g., braille, large print, audio tape, computer disk, email, TDD/TTYs etc.) to enable customers and potential customers to obtain adequate information about transportation services and to schedule them.

- Schedule and route information must be made available in a format a customer can use to access the bus system.
- Phone lines and hold times are measured for capacity constraints
- All materials associated with the ADA complementary paratransit process (e.g., public information brochure, cover letter, application form, eligibility determination letter etc.) must be available in alternative formats so that eligible and

potentially eligible customers can effectively apply for and use ADA complementary paratransit

### **Language Assistance at Public Meetings**

All meeting notices will have information on how to request translation services or listening devices. The PVRTA requires that you make this request a minimum of 72 hours in advance. Please contact the Pioneer Valley Planning Commission:

- Phone: 413-781-6045
- Email: [delving@pvpc.org](mailto:delving@pvpc.org)
- Mail:  
Pioneer Valley Planning Commission  
ATTN: David Elvin  
60 Congress Street  
Springfield, MA 01104

### **DISTRIBUTION OF INFORMATION**

PVRTA uses a few different methods for distributing media. Using a variety of methods ensures delivery of information to people in a form that is accessible to them.

#### **E-Mail**

PVRTA maintains a email database for the distribution of meeting announcements. This list includes riders who have provided their email address at previous PVRTA van riders meeting. The email list also contains human service agencies, Councils on Aging, and other stakeholders. This list will also be used in the future to disseminate other policy and service changes.

## **Seat Drops**

PVTA provides seat drops to van riders to announce upcoming meeting announcements. The driver will hand a meeting notice to each of the passengers for at least two weeks prior to the meeting. The notices are also posted during this time.

## **Mailing**

Upon successful completion of the application process, PVTA van riders are sent a packet of information including:

## **Floodgate Message(AKA Robo call)**

PVTA will utilize the floodgate message system to make riders aware of upcoming public meetings, policy changes and service disruptions due to inclement weather.

## **WHERE IS INFORMATION DISTRIBUTED?**

### **PVTA Website**

Full PVTA website: <http://www.PVTA.com>

ADA information: <http://pvta.com/mobilityImpaired.php>

DAR information: <http://pvta.com/seniors.php>

### **Customer Information Centers**

For printed material please visit the following locations:

PVTA Customer Service Office: 1341 Main Street Springfield,  
MA 01103

Holyoke Transportation Center: 206 Maple Street, Holyoke, MA  
01040

## HOW OFTEN IS INFORMATION DISTRIBUTED?

### Policies

Policies are updated as needed and approved by the PVTa Advisory Board. PVTa will disseminate this information using email, floodgate message and public meetings when appropriate.

### Service Hours/Days:

Service hours and days are updated as fixed route schedules change. The service hours are typically updated 4 times a year. This information is provided on the PVTa website, PVTa will also use the email system and floodgate message system to make customers aware.

Winter (December)

Spring (March)

Summer (May)

Fall (late August or early September)

## TELEPHONE NUMBERS & ADDRESSES

### Information, Comments, Complaints, Ticket Sales

<b>PVTa Customer Service Center</b>	<b>1-877-779-7882</b>
<b>1341 Main Street</b>	<b>or</b>
<b>Springfield, MA 01106</b>	<b>1-413-781-7882</b>

*Holyoke Transportation Center*

<b>Holyoke Transportation Center</b>	<b>1-413-536-0694</b>
<b>206 Maple Street</b>	
<b>Holyoke, MA 01040</b>	

*ADA Eligibility*

<b>2808 Main Street</b>	<b>1-413-732-6248</b>
<b>Springfield, MA 01107</b>	<b>ext. 214</b>

*Trip Reservations, Dispatch, Lost & Found*

<b>Paratransit Call Center</b>	<b>1-866-277-7741</b>
	<b>or</b>
	<b>1-413-739-7436</b>

*PVTA Administration*

<b>PVTA Administrative Offices</b>	<b>1-413-732-6248</b>
<b>2808 Main Street</b>	
<b>Springfield, MA 01107</b>	

## PARATRANSIT FARE INFORMATION

### Fares

\$2.50, \$3.00, or \$3.50 depending on your pick-up and drop-off location. Please ask about your fare when reserving your ride.

Companion: Same fare as Rider

Children (5 and under): No Charge

PCA: No Charge

\*Customer eligibility file must designate that the customer requires a PCA.

### Coupon Books

Coupon books for Paratransit customers are available. They come in books of 20 coupons for \$47.50 each (\$2.50 value per coupon). We also have .50 cent coupons available, a book of 10 coupons for \$4.75 each (.50 value per coupon). They can be purchased in person or by mail at the address listed below.

To Purchase Coupon Book(s) by mail, send a check or money order to:

PVTA Customer Service Center  
1341 Main Street  
Springfield, MA 01103

Tickets can also be purchased in person at other locations in the PVTA service area. Please contact **Customer Service Center** for locations in your area **1-877-779-7882**.

## PayPal

PVTA customers may also use PayPal to purchase tickets online. Please visit the PVTA.com to purchase tickets using this method. PayPal enables you to send payments quickly and securely online using a credit card or bank account. When you select the "Buy Now" button, you will go to a PayPal payment request link for you to make your payment on PayPal's website. If you want to add additional tickets or passes, you may "Continue Shopping" at which time you will be redirected back to the PVTA website. Passes are not valid for paratransit service.

If you do not have a PayPal account yet, you can sign up for an account. If you will be shipping your tickets or passes to an address that is different from your billing account, the PVTA will contact you to verify the information.

PVTA will process your order within two business days and send your tickets or passes via standard USPS mail. If you do not receive your passes or tickets within five business days, please contact PVTA to open an inquiry on your order.

**PVTA does not issue refunds for monthly pass and van tickets.**

## FREQUENTLY ASKED QUESTIONS

**Q: Who do I call if I leave something on the vehicle?**

**A:** Phone the Hulmes Call-Center at 1-866-277-7741 and they will contact the appropriate driver.



**Q: What if my ride is late?**

**A:** You may call the Hulmes Call-Center at 1-866-277-7741 to check on rides that are not on time or have not arrived by the end of the 20-minute window. Be sure to wait until the end of the 20-minute window or the vehicle could arrive while you go inside to make the call; and you could be charged with a No Show.

**Q: I am changing from using a walker to using a wheelchair, what should I do?**

**A:** It is important for you to phone the Hulmes Call-Center at 1-866-277-7741 and update the information on your mobility device. If you don't, a van could be dispatched which is not able to accommodate a wheelchair.

**Q: Can a driver refuse to help me enter my destination?**

**A:** Drivers will meet customers at the door of the pick-up or drop-off location. Drivers do not enter the home, or drop-off and pick-up locations. The driver must stay within sight of the vehicle; there are some situations when the driver cannot assist passengers to/from an entrance that is out of sight of the vehicle.

**Q: May I take a friend with me on my shopping trip?**

**A:** Yes, you may take a companion, who will pay the same fare as you. Companions are charged the same fare as the customer and must be picked up and dropped off at the same location. Additional companions

may travel with on a space available basis. You will need to tell the Reservationist at the Hulmes Call-Center whether you will have a companion with you in order to reserve space.

**Q: Why does the driver ask me to back my wheelchair onto the lift, when it is easier for me to go on facing the vehicle?**

**A:** The American Safety Council and the Passenger Assistance Training programs train drivers to board customers by backing onto the lift for safety reasons. There is less chance of an accident with this method.

**Q: What if the driver shows up before the 20 minute pick-up window and I'm not ready?**

**A:** Don't Rush! Drivers should not arrive early, but if they do they cannot leave until 5 minutes within the pick-up window have passed.

**Q: Why won't the driver take a tip from me?**

**A:** Drivers are not allowed to take tips.

**Q: When I have had a good or bad trip and I want to comment, who do I call?**

**A:** All comments may be submitted by mail, fax, phone or through the PVTA website under Customer Service Link:

Pioneer Valley Transit Authority

ATTN: Customer Service Manager

1341 Main Street, Springfield, MA 01103

Phone: (877) 779-7882

Fax: (413) 788-7272

Website: [www.PVTA.com](http://www.PVTA.com)