

FTA

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

St. Cloud Metropolitan Transit Commission (Metro Bus)

ADA Paratransit Compliance Review

Final Report
November 2016



U.S. Department of Transportation
Federal Transit Administration

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Table of Contents

Executive Summary	1
1 General Information	3
2 Jurisdiction and Authorities	5
3 Purpose and Objectives	7
3.1 Purpose	7
3.2 Objectives	7
4 Introduction to Metro Bus	9
4.1 Complementary Paratransit Services and Organizational Structure	9
5 Scope and Methodology	11
5.1 Scope	11
5.2 Methodology	12
5.3 Stakeholder Interviews	14
6 Findings and Advisory Comments	15
6.1 Comparable Complementary Paratransit Service	15
6.2 ADA Paratransit Eligibility Process	15
Absence of Administrative Burdens	15
Paratransit Eligibility Standards	16
Accessible Information	18
Eligibility Determinations or Presumptive Eligibility Within 21 Days	18
Written Eligibility Determinations Including Specific Reasons for Denials or Temporary or Conditional Eligibility Determinations	19
Recertification of Eligibility at Reasonable Intervals	19
Administrative Appeal Process for Denials or Decisions Granting Conditional or Temporary Eligibility	20
Complementary Paratransit for Visitors	21
6.3 Types of Service	21
6.4 Service Criteria for Complementary Paratransit	22
Service Area	22
Response Time	23
Fares	23
No Trip Purpose Restrictions	25
Hours and Days of Service	25
Absence of Capacity Constraints	26
No Restrictions on the Number of Trips Provided to ADA Paratransit Eligible Individuals	26
No Waiting List for Access to the Service	26
No Substantial Numbers of Significantly Untimely Pickups for Initial or Return Trips	26

No Substantial Numbers of Trip Denials or Missed Trips.....	27
No Substantial Numbers of Trips With Excessive Trip Lengths.....	28
No Operational Patterns or Practices Limiting the Availability of Service to ADA Paratransit Eligible Individuals.....	29
6.5 Subscription Service	30
6.6 Reasonable Policies for Proposed Service Suspensions for Missing Scheduled Trips and the Right to Appeal.....	30
6.7 Complaint Resolution and Compliance Information	32
6.8 Nondiscrimination.....	33
6.9 Training Requirements.....	34
6.10 Service Under Contract with a Private Entity	34
6.11 Service Provided by Another Public Entity	35
6.12 Coordination of Service	35
Summary Table of Compliance Review Findings	36

Attachments

- A FTA Notification Letter to Metro Bus
- B Metro Bus Response Letter to Draft Report
- C Dial-a-Ride Application
- D Dial-a-Ride Service Guide
- E Notice of Right to Appeal

Executive Summary

Objective and Methodology

This report reviews the St. Cloud Metropolitan Transit Commission's (Metro Bus's) complementary paratransit service (Dial-a-Ride) in the St. Cloud, MN metropolitan area. It verifies whether Metro Bus 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 Dial-a-Ride paratransit riders and local disability organizations
2. Site visit: a three-person review team's observation of how Metro Bus handles paratransit trip requests, scheduling and dispatching, examination of eligibility applications and related documents (including appeals), and interviews with Metro Bus employees
3. Analysis and reporting: identification of deficiencies requiring corrective actions and suggestions of effective practices in complementary paratransit service

Metro Bus's Dial-a-Ride complementary paratransit service includes the following positive program elements:

Positive Program Elements

- Metro Bus effectively addressed a prior compliance issue by eliminating denials of trip requests; since September 2015, Metro Bus has had no service denials.
- Metro Bus offers door-through-door service for all riders.
- Metro Bus has an exemplary training program.

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

Administrative Deficiencies

- Metro Bus does not sufficiently publicize or explain how to request information about Dial-a-Ride service in accessible formats.
- Metro Bus does not notify all Dial-a-Ride applicants in writing of their eligibility determination.
- Metro Bus does not offer free fare for Dial-a-Ride trips at times and locations where the fixed route is free.

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

Substantive Deficiencies

- Dial-a-Ride service is not available outside the boundaries of Metro Bus's four member cities in adjacent areas within 3/4-mile of some of its bus routes.
- Metro Bus does not sufficiently verify whether potential no-show trips are not missed trips.

Please see Section 6 for a discussion of all 18 deficiencies. The Summary Table of Compliance Review Findings (following Section 6) lists all findings. Metro Bus 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 Metro Bus compliance review. Information on Metro Bus, the review team, and the dates of the review are presented below.

Grant Recipient:	St. Cloud Metropolitan Transit Commission (Metro Bus)
City/State:	St. Cloud, Minnesota
Grantee Number:	1223
Executive Official:	Ryan Daniel, Executive Director
On-site Liaison:	Nicky Lahr, Operations Manager
Report Prepared By:	The Collaborative, Inc.
Dates of Site Visit:	July 19–22, 2016
Review Team Members:	David Chia, the Collaborative, Inc. Bill Schwartz, the Collaborative, Inc. Ian Kolesinskas, 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 Metro Bus

The St. Cloud Metropolitan Transit Commission (Metro Bus) provides fixed route and ADA complementary paratransit service in St. Cloud, MN and portions of three adjacent cities: Sartell, Sauk Rapids, and Waite Park, MN. Metro Bus is a public entity overseen by a five-member board of commissioners representing St. Cloud and the three other cities. Metro Bus employs its own management and staff for all operations and administrative activities.

The Metro Bus administrative offices are located at 665 Franklin Avenue NE, St. Cloud. Fixed route and paratransit operations, as well as vehicle parking and maintenance take place at this facility.

Metro Bus's fixed route fleet consists of 39 buses. In FY 2015 (October 2014–September 2015), Metro Bus provided 2,099,501 unlinked passenger trips on its fixed route buses. It had an operating budget of \$12.2 million.



For more information on Metro Bus services, go to ridemetrobus.com

4.1 Complementary Paratransit Services and Organizational Structure

Metro Bus operates Dial-a-Ride complementary paratransit service for individuals with disabilities who cannot use Metro Bus's fixed route bus service. Most Dial-a-Ride activities take place at Metro Bus's main facility, 665 Franklin Avenue NE, St. Cloud; Metro Bus also has a Mobility Training Center in downtown St. Cloud (700 West St. Germain Street) where travel training and paratransit eligibility determinations take place.

Table 4.1 presents ADA paratransit and total paratransit ridership for Fiscal Years 2013–2016. Metro Bus denied a substantial number of Dial-a-Ride trip requests through mid-FY 2014 but then expanded operational capacity, which eliminated denials, reporting only two in FY 2015 and none in FY 2016.

The Dial-a-Ride operating budget in FY 2015 was \$3.6 million.

Table 4.1 – Metro Bus Paratransit Ridership

Fiscal Year	Dial-a-Ride Trips	Denials
2013	119,789	2,533
2014	125,692	1,054
2015	132,485	2
2016 (10 months)	130,932	0
2016 (projected, 12 months)	138,456	0

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 Metro Bus'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 Mr. Ryan Daniel, Metro Bus Chief Executive Officer, on May 17, 2016, confirming the dates for the site visit and asking Metro Bus to send information to the review team in advance of the visit. (See Attachment A.)

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

- Metro Bus's description of how it structures its complementary paratransit service
- Public information describing Metro Bus's complementary paratransit service
- Metro Bus'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, Metro Bus 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
- Metro Bus'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 Metro Bus complementary paratransit service site visit took place July 19–22, 2016. The visit began with an opening conference, held at 9 a.m. at the Metro Bus administrative offices. Attending the conference were:

- Ryan Daniel, CEO, Metro Bus
- Tom Cruikshank, Chief Operations and Planning Officer, Metro Bus
- Paula Mastey, Chief Finance and Administrative Officer, Metro Bus
- Nicky Lahr, Operations Manager, Metro Bus
- Debbie Anderson, Community Outreach/Mobility Manager, Metro Bus
- Kim Hoff, Mobility Specialist, Metro Bus

- Kayla Filbert, Human Resources Specialist, Metro Bus
- Ed Yurek, Director of Maintenance, Metro Bus
- Steve Williams, IT and Data Manager, Metro Bus
- Jerry Gillman, Driver Instructor, Metro Bus
- Tammy Johnson, Dial-a-Ride Dispatcher, Metro Bus
- Richie Nguyen, Equal Opportunity Specialist, FTA (via telephone)
- Yolanda Mitchell, FTA (via telephone)
- David Chia, Review Team Leader, the Collaborative, Inc.
- Bill Schwartz, Review Team Member, the Collaborative, Inc.
- Ian Kolesinskis, Review Team Member, the Collaborative, Inc.

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

During the afternoon, two review team members observed Dial-a-Ride call takers, who also serve as dispatchers. One review team member began analyzing electronic data covering the selected sample week (May 8–14, 2016). Team members also interviewed three Dial-a-Ride drivers.

On the morning of July 20, review team members observed additional Dial-a-Ride reservations and other calls. Another team member visited the Mobility Training Center to review the eligibility determination process. He interviewed the mobility manager and mobility specialist and reviewed Dial-a-Ride files.

A team member reviewed the telephone system and hold time performance. Team members interviewed three additional Dial-a-Ride drivers. A team member met with the lead driver trainer. All team members reviewed additional policies and operations data. They also analyzed on-time performance and trip lengths, and reviewed telephone data.

On July 21, team members obtained data from the May sample week to determine if Metro Bus improperly coded missed trips as rider no-shows. A team member obtained sample complaint records and interviewed the Metro Bus operations manager to discuss the process for accepting, tracking, and responding to complaints. That afternoon, team members met with the Metro Bus chief finance and administrative officer to discuss the budget process and allocation of resources for Dial-a-Ride service. A team member interviewed the primary Dial-a-Ride scheduler and observed Dial-a-Ride dispatching. Team members continued analyzing on-time performance, trip lengths, and telephone hold times.

On July 22, the review team analyzed and tabulated the various data. They prepared for the exit conference, which took place at 1 p.m. at the Metro Bus administrative offices. Attending the conference were:

- Ryan Daniel, CEO, Metro Bus
- Tom Cruikshank, Chief Operations and Planning Officer, Metro Bus
- Paula Mastey, Chief Finance and Administrative Officer, Metro Bus
- Nicky Lahr, Operations Manager, Metro Bus
- Debbie Anderson, Community Outreach/Mobility Manager, Metro Bus
- Kim Hoff, Mobility Specialist, Metro Bus
- Steve Williams, IT and Data Manager, Metro Bus
- Jerry Gillman, Driver Instructor, Metro Bus
- Scott Stark, Driver Instructor, Metro Bus

- John Day, Program Manager for Policy and Technical Assistance, FTA (via telephone)
- Marisa Appleton, Oversight, FTA Region V (via telephone)
- David Chia, Review Team Leader, the Collaborative, Inc.
- Bill Schwartz, Review Team Member, the Collaborative, Inc.
- Ian Kolesinskas, Review Team Member, the Collaborative, Inc.

FTA provided Metro Bus with a draft copy of the report for review and response. See Attachment B for Metro Bus's correspondence documenting its response to the draft report.

5.3 Stakeholder Interviews

Before the site visit, the review team interviewed three Dial-a-Ride riders and three representatives of agencies/organizations that assist Dial-a-Ride riders on a range of topics, including eligibility determinations and various paratransit service issues. The following is a summary of comments the review team received.

Eligibility. One rider described the in-person assessment as burdensome. Others cited no problems with either the initial assessment or the recertification process.

Telephone access. One rider reported occasional long hold times in the morning (prior to 8 a.m.) and at lunchtime. Others reported no problems with long hold times.

Denials. No stakeholder was aware of wait lists or trip denials in recent years.

Trip negotiation. Riders (incorrectly) stated that Metro Bus does not negotiate trip requests. Riders understood they had the option to request either a pickup or drop-off time, but not both.

On-time performance. All individuals interviewed were satisfied with trips being on time, both for pickups and drop-offs.

Wait time policy. Metro Bus offers "door-through-door" service, meaning Dial-a-Ride drivers escort riders from and to the front door of pickup and drop-off locations. This service exceeds the minimum origin-to-destination service requirements. When drivers arrive on-time (i.e., not early), this means drivers go to the door and then wait for one minute after ringing the doorbell before returning to their vehicle and departing. Two riders expressed concern about this policy, which may result in a no-show. (See untimely pickups discussion in Section 6.4.)

Travel times. One rider described her regular Sunday trips as "overly long." No riders or agency workers reported issues with long trips.

Drivers. Individuals were generally complimentary of the Dial-a-Ride drivers, describing them as helpful.

Resolving Complaints. Two individuals made complaints, both by telephone. Both expressed satisfaction with how Metro Bus responded to their complaints.

Other Comments. Two individuals who work for social service agencies noted that they arrange many of their riders' trips as "agency trips." They are guaranteed certain pickup and drop-off times. The negotiated one-way fare for these agency trips is \$4.75.

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 Metro Bus’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 Metro Bus to provide comparable paratransit service. Metro Bus operates Dial-a-Ride paratransit that serves individuals certified for ADA complementary paratransit service.

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 respect to the prohibition against unreasonable administrative burdens in Metro Bus’s ADA paratransit eligibility process.

Dial-a-Ride applicants may download applications from the Dial-a-Ride page of the Metro Bus website. They can also request applications by mail, at the downtown Mobility Training Center, or at community outreach sessions that Metro Bus holds, which in FY 2015 included 5,800 attendees. Applicants may submit completed applications by mail, fax, or in person.

The Dial-a-Ride application is an eight-page form (see Attachment C) that includes the following components:

- Overview of the process
 - How to apply

- What will happen at the interview?
- When and how will you find out if you are eligible?
- Part A. General information: why applicant is requesting Dial-a-Ride eligibility, name and contact information
- Part B. Applicant's information: current capability to travel, characteristics of disability
- Part C. Current use of fixed route bus service: past or current use of bus, barriers to fixed route
- Part D. Common destinations: addresses and current way of traveling to three common destinations
- Part E. Signature
- Authorization for Release of Medical Records: name and contact information of medical professional

After Metro Bus receives a completed application, the mobility specialist calls the applicant to schedule an interview and possible functional assessment at the Mobility Training Center. Metro Bus provides free Dial-a-Ride transportation to these appointments 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, deficiencies were found with Metro Bus's process to determine if individuals are ADA paratransit eligible.

Metro Bus uses the written application, in-person interview, assessment, and medical information to make an eligibility determination.

At the time of the site visit, Metro Bus had 1,671 individuals in its database certified as ADA paratransit eligible. During the preceding 12 months (June 2015–May 2016), Metro Bus received 438 Dial-a-Ride applications (including recertifications).

Metro Bus interviews more than 90 percent of first-time applicants. Applicants not interviewed are typically those seeking temporary eligibility while using mobility aids like crutches or wheelchairs. In addition to conducting interviews in its own facility, Metro Bus interviews some applicants at nursing homes. The mobility specialist uses different sets of interview questions depending on the nature of each applicant's disabilities.

The mobility specialist observes applicants and, based on answers to her questions, determines whether to conduct a functional assessment. The mobility center has a fully equipped indoor course, including an

actual front half of a bus, simulated crosswalk, and sloped and uneven paths. The mobility specialist may escort the applicant outside to walk the sidewalk and to cross streets.

Metro Bus requests a medical professional’s name and contact information as part of its evaluation and contact a medical professional for about 10 percent of all applicants, typically for applicants with cognitive disabilities.

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

- Unconditional
- Conditional
 - Snow/ice present
 - Darkness (for individuals with visual disabilities)
 - Distance (specified) to travel to bus stop
 - Temperature ranges
 - Except for certain origin-destination pairs: for individuals who have been trained to use the fixed route for certain trips, they do not receive paratransit service for those trips, but are eligible to use Dial-a-Ride for other trips
 - “Vulnerability” (mainly for individuals with cognitive disabilities)
- Temporary: up to 12 months
- Denial (not eligible)

Table 6.1 presents the distribution of determinations for the 12 months preceding the site visit.

Table 6.1 – Dial-a-Ride Eligibility Determinations, June 2015–May 2016

Category	Number	Percent*
Unconditional	265	62.2
Conditional	33	7.7
Temporary	118	27.7
Not eligible	10	2.3
Withdrawn application	12	—
Applications received	438	100.0

* Excludes withdrawals

To assess Metro Bus’s eligibility determination process, the review team examined a sample of 20 eligibility determination files. This included three determinations of unconditional eligibility, two determinations of temporary unconditional eligibility, five conditional eligibility determinations, eight eligibility denials, and two withdrawn applications.

All but two determinations appeared proper. For one applicant, Metro Bus denied eligibility to an otherwise unconditionally eligible applicant because the combined weight of the individual plus his wheelchair exceeded the Dial-a-Ride vehicle’s lift capacity of 800 pounds. An applicant’s ADA paratransit eligibility is based on functional ability to use fixed route transit, not the vehicle’s lift capacity. Transit agencies must grant eligibility based on functional ability and may inform the approved applicant of any lift capacity issues, assuming their vehicles are compliant with 49 CFR Part 38.

A second improper determination was for an individual given conditional eligibility for “eye appointments only.” While Metro Bus may condition eligibility for certain trips and require rider to use fixed route service for a particular origin-destination pair, it may not impose a condition that limits Dial-a-Ride use to a particular trip purpose or destination.

Corrective Actions and Schedule: Within 60 days of the issuance of the final report, Metro Bus must revise its criteria for Dial-a-Ride eligibility so that it does not deny service to an applicant solely because the combined weight of the individual and his/her mobility device exceeds the capacity of its vehicles' lifts.

Metro Bus must also revise its criteria for Dial-a-Ride eligibility determination so that when it grants conditional eligibility, the condition is not limited by trip purpose.

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, deficiencies were found with this requirement to have information in accessible formats.

Metro Bus makes all information about Dial-a-Ride service, including the eligibility application and other eligibility material, available in accessible formats upon request. However, Metro Bus does not sufficiently publicize this or explain how to request these materials. Neither the Dial-a-Ride Service Guide (Service Guide—see Attachment D) nor the Dial-a-Ride application refers to the availability of information in accessible formats.

The “Contact Us” page on Metro Bus’s website (www.ridemetrobus.com/contact_us.php) has a Civil Rights section with information on Limited English Proficiency and Title VI complaints, but no information on accessible formats—whether about eligibility or other aspects of Dial-a-Ride service.

Corrective Actions and Schedule: Within 60 days of the issuance of the final report, Metro Bus must publicize the availability of all public information about Dial-a-Ride service in accessible formats. This includes the application form, eligibility-related communications, the Service Guide, and other materials.

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 Metro Bus to communicate an applicant’s right to presumptive eligibility. An advisory comment is made regarding application recordkeeping.

The application states (page 2): “This [eligibility] decision will be made within 21 days of the date we receive your application. If a decision is not made in 21 days, we will provide you with Dial-a-Ride until a final decision is made.” This standard, tied to the receipt of application and not to a completed application process, is stricter than the regulations require.

The review team examined a sample of applicant files to calculate the number of days Metro Bus needed to make its determination. A majority of determinations were made within two days after the interview or receipt of the written application (if there was no interview). Approximately 10 percent of determinations took longer than two days, with some taking more than 21 days. Metro Bus explained these longer processing times were often a result of the mobility specialist’s vacation schedule. Delays also occurred when Metro Bus requested additional information from the named medical professional but did not receive a timely response. The files in such instances did not have notes explaining the reasons for the delays.

Advisory Comment: An effective practice is for Metro Bus to record all steps in the eligibility determination process for each applicant, including activities, communications, and dates.

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 Metro Bus documents its eligibility determinations.

Metro Bus'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

When applicable, the letters do not mention the applicant's potential need for a personal care attendant. Also when applicable, the letters state the conditions for conditional or temporary eligibility.

All letters granting other than unconditional eligibility appropriately explain the applicant's right to appeal the decision. In addition, Metro Bus provides an ID card to all individuals who receive unconditional, conditional, or temporary eligibility.

Metro Bus does not send a determination letter to all applicants. For example, when Metro Bus has sufficient information to make a determination of not eligible, it explains such findings at the conclusion of the interview/functional assessment. Metro Bus does not subsequently send a written determination to the applicant. This is not compliant as all determinations must be in writing.

Metro Bus does not provide written determinations for riders with unconditional eligibility seeking recertification. Instead Metro Bus communicates its plans to recertify the individual upon receipt of their application. This is not a sufficient notification: it lacks most of the required information (e.g., the eligibility expiration date).

Corrective Actions and Schedule: Within 60 days of the issuance of the final report, Metro Bus must begin sending written notification of eligibility to all applicants for Dial-a-Ride service. In addition, Metro Bus must revise the determination letter to include information about whether the rider may be traveling with a personal care attendant.

Recertification of Eligibility at Reasonable Intervals

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

Discussion: During this compliance review, no deficiencies were found with the Metro Bus process for recertifying ADA paratransit eligibility.

Metro Bus certifies riders with unconditional or conditional eligibility for three years and notifies riders by mail 30–60 days prior to the expiration date. The notification includes a recertification form, which is shorter than the initial application.

Metro Bus reviews each recertification request by focusing on any new or worsening conditions and limits the need for interviews or in-person assessments to a small portion of the recertifications, typically riders with conditional eligibility whose conditions may be worsening. Metro Bus offers free transportation to such interviews or functional assessments.

After processing a recertification application, Metro Bus sends a new certification letter when a rider's eligibility changes from conditional to unconditional or remains conditional. As with its initial determinations, Metro Bus does not send a new letter to riders whose eligibility remains unconditional. (See previous discussion.)

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 Metro Bus uses for eligibility applicants to appeal eligibility determinations. An advisory comment is made concerning instructions for appealing a decision.

Metro Bus's “Notice of Right to Appeal” (see Attachment E) explains the appeal process, which is similar to appealing a potential suspension for excessive no-shows. (See Section 6.6.).

This process includes the following elements:

- Appellants may request an in-person hearing.
- Metro Bus asks for appeal requests in writing.
- Metro Bus holds appeal hearings on the third Tuesday of every month.
- Appellants may present additional information and witnesses at their hearing.
- If the appeal committee has not made decision within 30 days of a hearing, appellants receive presumptive eligibility.

A five-member appeal committee reviews each appeal request. Committee members are drawn from a pool of 11 professionals and/or persons with disabilities. The pool includes two current Dial-a-Ride riders, an individual with a visual disability (not a Dial-a-Ride user), physical therapists, social workers, and staff from independent living centers and home health care agencies.

At the time of the site visit, since these procedures became effective in June 2015, no applicants or riders had filed an appeal.

The instructions for filing an appeal state, “Applicants are urged to state in their appeal letter the reasons why they believe the determination does not accurately reflect the ability to use fixed route Metro Bus service [emphasis added]. The same paragraph states, “An applicant may, however, request an appeal hearing without providing additional detail and without the submission of additional written material information.”

While this language does not require written appeals, it may be confusing to some. The second sentence has an appropriate neutral tone.

Advisory Comment: An effective practice is for Metro Bus to modify its appeal instructions with more permissive language such as “applicants have the option to submit their appeals in writing.”

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 Metro Bus 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, no deficiencies were found with Metro Bus’s process to provide service to visitors to the Dial-a-Ride service area.

The Dial-a-Ride Service Guide states (page 6):

Visitor: Allows use when visiting and staying in Metro Bus service area. Must prove eligibility by presenting an identification card from their local public transportation program, or prove mobility impairments, such as use of a wheelchair or other mobility aid. Using the service longer than 21 days in a 365-day period of time requires completion of application.

A visitor who wants to use Dial-a-Ride service may mail, e-mail, or fax documentation to Metro Bus or visit the Mobility Training Center to provide the documentation or demonstrate his or her mobility impairment. Metro Bus usually approves temporary certification on the same day, and the visitor may request service for the following day.

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 the Metro Bus policies for providing assistance to Dial-a-Ride passengers, or implementing the policies.

Metro Bus explains its policies in the Dial-a-Ride Service Guide (page 6):

Door-Through-Door Service Policy

Door-through-door service means that drivers will assist all passengers through the first door of the building (first door definition is “giving inside access to the building”) at both their point of origin and their destination.

Driver assistance ends when the driver has assisted the passenger through the first door of the building. Drivers are not allowed to assist beyond this point.

Metro Bus provides a level of service exceeding the regulatory requirements. Both riders and drivers confirmed this is the actual practice for Dial-a-Ride service.

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, deficiencies were found with the Dial-a-Ride complementary service area.

Metro Bus appropriately applies a 3/4-mile buffer to its fixed route corridors when determining the Dial-a-Ride service area, but incorrectly limits it to the municipalities its bus routes serve (St. Cloud, Sauk Rapids, Waite Park, and Sartell). No Dial-a-Ride service is available within 3/4-mile of the following Metro Bus locations and routes just beyond the four cities’ boundaries:

- East of Sauk Rapids, along Metro Bus route #21
- East of Sauk Rapids, along Metro Bus route #6
- West of Waite Park, along Metro Bus route #10
- West of Waite Park, along Metro Bus route #3

In addition, Metro Bus’s published materials show a Dial-a-Ride service area map with gaps in the core service area. These are in small regions surrounded by areas within 3/4-mile of bus routes. Metro Bus honors trip requests within the entire core service area and the discrepancy is in the published materials, not in the service provided.

Corrective Actions and Schedule: Within 60 days of the issuance of the final report, Metro Bus must revise its Dial-a-Ride service area to include all areas that are within 3/4-mile of its fixed routes, or

demonstrate that it does not have the legal authority to operate in those areas. Metro Bus must also revise its published service area map to be consistent with the required 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, a deficiency was found with Metro Bus's response time.

Metro Bus's administrative offices are open from 8 a.m. to 5 p.m. on weekdays. Metro Bus accepts Dial-a-Ride trip reservations during these same hours on weekdays and 9 a.m. to 5 p.m. on weekends. The weekend hours do not comply with the requirement to accept trip requests during times comparable to normal business hours even on days when the offices are not open before a normal service day.

During the site visit, review team members spent four hours listening to Dial-a-Ride dispatchers taking trip requests and confirmed that:

- Riders may request trips between one and seven days in advance.
- Metro Bus negotiates pickup times within one hour of a requested time.
- Riders may ask for an appointment (drop-off) time in place of a pickup time.

Metro Bus uses an internal window from 10 minutes before to 10 minutes after the negotiated pickup time (+10/-10). As discussed in 6.3 (Types of Service), Drivers must wait until the scheduled pickup time and stay for one additional minute before they may depart. Riders are expected to be ready at the scheduled pickup time.

The discussion of untimely pickups in (see Section 6.4) includes an advisory comment regarding the Dial-a-Ride pickup window.

Corrective Action: Within 60 days of the issuance of the final report, Metro Bus must accept requests for Dial-a-Ride trip reservations on weekend days during the same hours as regular weekday business hours.

Fares

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

Discussion: During this compliance review, deficiencies were found in Metro Bus’s complementary paratransit fare policy and its companion policy.

The Metro Bus fixed route fare is \$1.25 and the Dial-a-Ride fare is \$2.50, which is compliant. Metro Bus also has agreements with certain social service agencies for which it charges an “agency fare” of \$4.75 per passenger trip.

Metro Bus operates two “Late Nite” fixed routes (Routes 94 and 95). These routes offer free fare hours from 1:45 to 2:35 a.m. on early Friday, Saturday, and Sunday mornings when Saint Cloud State University (SCSU) is in session. These routes run between Metro Bus’s Transit Center and SCSU. Metro Bus does not offer free Dial-a-Ride service for comparable trips during these service hours.

In the summer months, Metro Bus also offers a free trolley on Wednesday nights from 5-9:25 p.m. The trolley runs from several parking lots and destinations in downtown St. Cloud to an event venue in Lake George. While Dial-a-Ride service is available in this area during the same hours, Metro Bus charges its regular Dial-a-Ride fare for comparable trips.

As discussed FTA Circular 4710.1,

In cases where complementary paratransit riders are traveling between origins and destinations that are both within 3/4 mile of a zero-fare route, and the typical fixed route user would make use of this zero-fare route to make a comparable trip, applying the § 37.131(c) maximum fare provisions means the complementary paratransit fare for this trip is also zero. FTA recommends that agencies with free-fare zones that wish to determine whether a typical fixed route user would in fact take advantage of the free-fare option compare the following elements in their analysis:

1. Regular fixed route fare (outside of free-fare zone)
2. Frequency of the free service versus alternative service
3. Need for transfers on the free versus alternative service
4. Walking distances to and from the free service versus the alternative

Such an analysis would demonstrate that fixed route riders might walk to the nearest boarding point in the free-fare zone instead of boarding the nearest fixed route vehicle and transferring to the free-fare service. It might also demonstrate that individuals crossing the free-fare zone will typically use the regular fixed route system, while individuals traveling between points along the free-fare zone are more likely to use the free-fare service. This analysis would enable a transit agency to determine whether it may charge a fare for a given complementary paratransit trip from origins to destinations that are both within 3/4 mile of the free-fare zone.

Metro Bus does not charge a fare for PCAs. Companions pay the same fare as riders. However, Metro Bus’s companion policy includes an improper restriction. The Service Guide states (page 12):

Travelling Companions

A certified individual suspended under the Guidelines cannot travel as a companion of another certified individual under this section.

Metro Bus established this policy to prevent suspended riders from bypassing the suspension if they travel with another eligible rider as a companion. However, because riders may travel with anyone as a companion without identifying the companion, this policy is both impractical and not permitted.

Corrective Actions and Schedule: Within 60 days of the issuance of the final report, Metro Bus must revise its fare policy to ensure that fares for comparable Dial-a-Ride trips are the same, which means some Dial-a-Ride trips during free-fare hours are also free. Metro Bus must permit all Dial-a-Ride riders to travel with any companion, regardless of their own ADA paratransit eligibility status.

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. An advisory comment is made concerning Service Guide wording regarding who may use Dial-a-Ride service.

According to the Service Guide (page 2), “Dial-a-Ride is for residents of St. Cloud, Waite Park, Sauk Rapids and Sartell to get to and from activity centers, medical facilities, work, school, grocery shopping and other community functions.” While in practice Metro Bus confers eligibility to applicants wishing to travel within its service area and does not limit eligibility to residents of the above cities, this statement can be confusing. A clearer explanation might state, “Riders may use Dial-a-Ride to get to and from activity centers, medical facilities, work, school, grocery shopping, and other activities.”

During the site visit, the review team confirmed that Dial-a-Ride dispatchers do not ask for trip purpose when taking trip requests. Metro Bus does restrict will-call pickups to medical appointments. This is an acceptable policy, as will-calls are a premium service.

Advisory Comment: An effective practice is for Metro Bus to remove wording in its Service Guide implying that Dial-a-Ride service is limited to *residents* of St. Cloud, Waite Park, Sauk Rapids and Sartell.

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, deficiencies were found with the availability of Dial-a-Ride service during all hours Metro Bus operates fixed route service.

Table 6.2 compares the published service hours for Dial-a-Ride and fixed routes. As published, most weekday fixed routes extend longer (by 90 minutes) than Dial-a-Ride service. The review team found that in practice, Metro Bus accepted trip requests and scheduled rides during the same longer hours of fixed route service.

In addition, the previously mentioned SCSU service (Routes 92, 93, 94, and 95) operates during the academic year without complementary paratransit service.

Table 6.2 – Dial-a-Ride and Fixed Route Service Hours

Days	Dial-a-Ride	Fixed Route
Monday–Friday	5:30 a.m.–9 p.m.	5:10 a.m.–10:30 p.m.*
Saturday	8 a.m.–6:30 p.m.	7:45 a.m.–7 p.m.*
Sunday	9 a.m.–6 p.m.	8:45 a.m.–6 p.m.

*SCSU service extends to 2:47 a.m. late Thursday, Friday, and Saturday

Corrective Actions and Schedule: Within 60 days of the issuance of the final report, Metro Bus must implement policies to ensure it operates Dial-a-Ride service during the same days and hours as its fixed routes. Metro Bus must also revise its public information to describe the actual hours of operation.

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. Metro Bus does not limit the number of trips provided to the Dial-a-Ride 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.¹

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 dispatchers denying trip requests or placing any requests on waiting lists.

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

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

Discussion: During this compliance review, no deficiencies were found with Dial-a-Ride on-time performance for initial or return trips. An advisory comment is made regarding Metro Bus's wait policy for riders that do not appear at the door within one minute, which may help to improve on-time service efficiency.

Metro Bus tracks on-time performance each month. Table 6-3 presents reported Dial-a-Ride on-time performance from June 2015 through May 2016. As shown, on time performance ranged between 93.9 percent and 95.8 percent.

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

Table 6-3 –Reported Dial-a-Ride On-Time Performance (Jun 2015–May 2016)

Month	On-Time Percentage	Month	On-Time Percentage
Jun-15	93.9%	Dec-15	95.3%
Jul-15	94.3%	Jan-16	95.3%
Aug-15	93.8%	Feb-16	94.2%
Sep-15	94.5%	Mar-16	95.3%
Oct-15	95.4%	Apr-16	95.8%
Nov-15	95.0%	May-16	95.6%

The review team obtained electronic records for 2,198 trips during the May sample week to independently analyze on-time performance. Table 6-4 summarizes the analysis, which shows on-time performance comparable to Metro Bus’s reported information.

Table 6-4 – On-Time Performance for 2,198 Dial-a-Ride Trips (April 8–14, 2016)

	Number	Percent
Early	54	2.5%
In window (-10/+10)	2,071	94.2%
Early or in Window		96.7%
All late	73	3.3%
1–15 minutes late	71	3.2%
16–30 minutes late	0	0%
>30 minutes late	2	0.1%

Metro Bus’s -10/+10 pickup window is internal, meaning Metro Bus does not explain the window to riders. Its Service Guide (page 11) states:

Passengers must be prepared and ready at the first door at their scheduled pick-up time in order to keep the bus on schedule. If the driver arrives and the passenger is not ready at the first door, the driver is allowed to leave one minute after the scheduled pick-up time, which will result in a no-show for the passenger.

While transit agencies may set their own policies regarding appointment times and driver wait times, Metro Bus’s practice may be confusing to riders because in some instances (≤10 minutes before the pickup time), the driver will come to the door and, if the rider is not ready, return to the vehicle and wait until the pickup time, then come back to the door at the pickup time. In other instances (≥10 minutes after the pickup time), the driver will come to the door and depart after one minute if the rider is not ready/does not appear.

Advisory Comment: An effective practice when using pickup windows is clearly explain them to riders in public information and when confirming reservations calls.

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, no deficiencies were found with this requirement. Metro Bus does not deny any request for complementary paratransit trips nor does it appear to have a substantial number of missed trips.

In pre-visit materials provided to the review team, Metro Bus stated, “We have a No-Denial Policy in place. Zero percent is our acceptable rate.”

Until January 2014 when it increased Dial-a-Ride capacity, Metro Bus regularly had hundreds of denials each month for Dial-a-Ride trip requests. From February 2014 to August 2015, there were seven reported denials; since September 2015, there were no reported denials.

The review team observed call takers negotiating trip requests, properly offering times within 60 minutes of the request, and accepting all requests for trips with appointment (drop-off) times without negotiation. Metro Bus personnel occasionally adjust pickup times after the initial negotiation, but call the rider the day before the trip to seek approval for the adjustment. They don’t change the time without approval. During the sample week, Metro Bus provided almost all of the trips requested except cancellations at the door, 36 no-shows, and ten missed trips. Accordingly, the number of missed trips is not substantial. See Section 6.6 for a discussion of no-show trip verification for potential missed trips.

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, a deficiency was found with Metro Bus’s long trip definition. No deficiencies were found with the prohibition against a substantial number of trips with excessive trip length or a pattern of complementary paratransit trips with excessive trip lengths.

Metro Bus defines excessively long trips as 75 minutes or greater and has a goal of 95 percent of its rides being 60 minutes or less on a monthly basis. This definition and goal do not take into account the comparability to fixed route service. FTA encourages standards that consider trip distances and associated travel times on fixed route.

The review team analyzed the 2,198 trips from the May 2016 sample week, during which 34 trips took 60 minutes or longer (1.5 percent). The review team used this 34-trip sample because shorter trips are less likely to yield a travel time difference of more than 20 minutes between fixed route and Dial-a-Ride travel. Of these 34 trips, there were 18 unique itineraries (signifying that the long trip sample had repeated origin-destination pairs).

The review team consulted with a Dial-a-Ride dispatcher to determine the comparable Metro Bus fixed route itineraries for these 34 trips (same origin and destination, same day and time). Based on this analysis, the review team determined that for these 34 Dial-a-Ride trips:

- 13 trips were shorter than their comparable fixed route trips (38.2 percent)
- 1 trip was the same length as its comparable fixed route trip (2.9 percent)
- 15 trips were 1–20 minutes longer than their comparable fixed route trips (44.1 percent)
- 5 trips were more than 20 minutes longer their comparable fixed route trips (14.7 percent)

These results do not represent a substantial number of trips with excessive trip lengths.

Corrective Actions and Schedule: Within 60 days of the issuance of the final report, Metro Bus must revise its long-trip definition to reflect comparability to fixed route travel times and not an absolute standard.

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, no deficiencies were found with Metro Bus's telephone performance. An advisory comment is made regarding performance measures and tracking. In addition, no deficiencies were found with drop-off performance.

Telephone Hold Times

Metro Bus's telephone service standards are:

- Hold time: 30 seconds or less
- Abandoned calls: 5 percent or less of calls received
- Percentage of calls to be handled within these standards: 95 percent

The 30-second hold time standard and goal for 95 percent of calls to be answered within 30 seconds is ambitious. 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).

The review team examined system-generated telephone service reports for the May 2016 and found one half-hour period (6:30–7 p.m.) when average hold times exceeded one minute. This is after the offices close at 5 p.m. In addition, during its observations of Dial-a-Ride calls, the review team observed sufficient capacity to handle all calls. Metro Bus has both monitoring systems and procedures in place to notify others when telephone hold queues build and other staff members need to assist.

Advisory Comment: When using specific standards for telephone hold time performance, an effective practice is to produce reports that provide the necessary information. For instance, with a performance standard that "95 percent of calls should be answered within three minutes, and 99 percent of calls should be answered within five minutes," the telephone system should track the number and percent of calls taking three minutes or more and five minutes or more. Ideally, the reports would flag those hours in which the standards are not met.

Drop-off Performance

Approximately 26 percent of the 2,198 trips during the sample week had appointment times. Of these, 15 trips (2.7 percent) were late, meaning that 97.3 percent took place before the required drop-off time. Approximately 22 percent of the drop-offs were more than 30 minutes early. The review team asked Metro Bus about these trips to ensure that drivers were not leaving riders at drop-off addresses before buildings opened. Metro Bus explained it tracks hours of operation and its door-through-door policy ensures that when drivers accompany riders to buildings that are not yet open, the drivers return the riders to the vehicle and wait.

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 Metro Bus provides subscription service as part of its Dial-a-Ride service.

According to the Dial-a-Ride Service Guide (page 9):

Subscription Service may be available for those who travel to the same place, at the same times, several days a week. To be considered for Dial-a-Ride Subscription service, all of the following criteria must be met:

- Certified to use Metro Bus Dial-a-Ride, except those with Temporary or Visitor certifications
- Request is for travel to the same destination at the same time—at least three times a week

With no ongoing denials since 2014, Metro Bus was considering changing its written policy to allow subscription service for riders who want one or two trips per week.

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, deficiencies were found with Metro Bus’s no-show verification process. No deficiencies were found with Metro Bus’s policies and processes for no-show suspensions.

Metro Bus charges a rider with a no-show “when an individual schedules a ride and fails to use the service by missing their scheduled ride or does not give sufficient cancellation notice (less than 2 hours)” (Service Guide, page 9).

Furthermore, as stated in the Service Guide (page 9):

If an individual receives more than five (5) no-shows in a 30-day period AND the no-shows equal more than 10% of their total trips scheduled for that 30-day period of time, they will be suspended.

Metro Bus sends a letter to the rider for each charged no-show. The rider may appeal individual no-shows within 10 business days of receipt of the letter; the appeal can be in writing, by phone, or in person. Metro Bus then replies to the appeal within 10 days of receipt.

If a rider has six or more no-shows that comprise greater than 10 percent of total trips in a 30-day period, Metro Bus sends a suspension letter. The first suspension is for seven days. Repeated patterns of excessive no-shows within one year increase the suspension length: 14 days for a second suspension, 21 days for a third suspension, and 30 days for a fourth suspension.

According to the Service Guide (page 10):

Consideration will be given for no-shows that are beyond the passenger's control, which could include any of the following:

1. The vehicle arrived at the pick-up location late and the passenger was not ready, had left to call, or made other arrangements;
2. A sudden personal or family emergency arose that caused the passenger to change plans and did not allow time to notify dispatch; or
3. A sudden turn for the worse for a passenger with a variable condition.

A rider may appeal a proposed suspension in writing or by attending a monthly Dial-a-Ride Appeal Committee meeting. Proposed suspensions are deferred until after appeal decisions are made. The Committee may dismiss one or all charged no-shows or may uphold a suspension.

As of the site visit, Metro Bus had imposed five Dial-a-Ride suspensions (four different riders) since August 2015, when these policies and procedures went into effect.

Metro Bus tracks Dial-a-Ride rider no-shows. In the sample week, 36 scheduled trips (1.6 percent) were recorded as no-shows. However, Metro Bus does not analyze these no-shows to determine if they may have been missed trips.

Missed trips, which are caused by agencies and not by riders, result from trips that are requested, confirmed, and scheduled, but do not take place because:

1. The vehicle arrives and leaves before the beginning of the pickup window without picking up the rider and without any indication from the rider that he or she no longer wants to make the trip. Note that a rider is not obligated to board until the beginning of the pickup window or—for transit agencies that have a 5-minute wait-time policy—from the start of the pickup window until 5 minutes have elapsed.
2. The vehicle does not wait the required time within the pickup window, there is no contact with the rider, and the vehicle departs without the rider. Note that if during the wait time the rider indicates he or she no longer wants to take the trip, this is typically recorded as a “cancel at the door.”
3. The vehicle arrives after the end of the pickup window and departs without picking up the rider (either because the rider is not there or declines to take the trip because it is now late).
4. The vehicle does not arrive at the pickup location. (FTA ADA Circular Page 8-22)

The review team analyzed two reports (60 no-shows) to determine if Metro Bus had improperly characterized operator missed trips as rider no-shows, including:

- 36 no-shows recorded in the sample week
- 24 no-shows charged to three riders Metro Bus suspended for excessive no-shows

The review team verified 53 no-shows; Metro Bus did not have sufficient documentation to verify three no-shows and the four were operator missed trips.

Corrective Actions and Schedule: Within 60 days of the issuance of the final report, Metro Bus must implement procedures to verify all potential no-shows before assessing no-shows to a rider.

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, a deficiency was found with Metro Bus's public information on filing ADA-related complaints. A deficiency was also found with tracking and communicating complaint responses.

Metro Bus's operations manager is the designated official to coordinate complaint procedures. Her contact information is not included in the Service Guide or on Metro Bus's website. While Metro Bus offers telephone and e-mail instructions as well as a customer feedback web form for submitting comments or complaints, its webpage dedicated to ADA services only has a general contact information link at the bottom of the page. Metro Bus has a formal complaint form on its website, but it is tied to Title VI issues and not to ADA issues.

The review team determined that Metro Bus staff handles complaints equitably. Appropriate procedures—with the exceptions noted below—are in place regarding ADA-related complaints.

Dispatchers handle all telephone complaints related to Dial-a-Ride, gathering information from the complainant and entering it into a complaint database. The system is programmed to notify street supervisors of any service complaints. These supervisors investigate complaints reviewing relevant audio, video, and paratransit software information.

Each complaint file includes a detailed narrative, the person assigned to conduct the investigation, the findings, and the resolution of the complaint. However, because Metro Bus does not consistently communicate the resolution to the complainant or document its response, the review team was unable to determine whether complaints are resolved promptly.

Metro Bus maintains detailed complaint records extending back at least seven years.

Corrective Action and Schedule: Within 60 days of the issuance of the final report, Metro Bus must advertise contact information for the staff member responsible for accepting ADA-related complaints. Metro Bus must also promptly communicate complaint resolutions to complainants and document the dates of such communications.

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, two deficiencies were found related to discriminatory policies and practices.

The Service Guide includes an “Expectations” section (following page 16), which states,

What the Metro Bus Dial-a-Ride program, its drivers and its staff expect from Passengers:

- Respect toward drivers, other riders and staff
- No eating, drinking or smoking on the vehicle
- Appropriate personal hygiene
- Personal assistive devices that are in good working order
- Steps, ramps, sidewalks and driveways that are clear of snow and ice
- Rides that are free of disruptive behavior
- Adherence to scheduling policies (i.e. ready and waiting at the first door of the building at your scheduled pick up time)

The first two policies would also apply to fixed route passengers; Metro Bus has similar policies governing rider behavior. The third policy governing personal hygiene is neither listed as a fixed route policy nor appropriate for complementary paratransit. As discussed in the FTA ADA Circular, “a transit agency cannot refuse service to individuals with disabilities solely because their appearance or involuntary behavior may offend, annoy, or inconvenience employees or other riders.” The Circular continues, “It would not be appropriate to refuse service if the situation were merely unpleasant to other passengers or drivers. If the situation disrupts the provision of service, however, grounds for refusing service may exist.” (See Circular Section 2.27, page 2-5.)

Metro Bus uses the following definition of wheelchair in its Service Guide:

A wheelchair is defined by the ADA as a mobility aid belonging to any class of three or four-wheeled devices, usable indoors, designed for and used by individuals with mobility limitations, whether operated manually or powered.

The 49 CFR 37.3 definition states,

Wheelchair means a mobility aid belonging to any class of three- or more-wheeled devices, usable indoors, designed or modified for and used by individuals with mobility impairments, whether operated manually or powered.

Corrective Actions and Schedule: Within 60 days of the issuance of the final report, Metro Bus must revise its Service Guide to remove any references to personal hygiene without also incorporating the 37 CFR 37.5(h) requirements governing service refusal. Metro Bus must also revise its Service Guide to accurately reflect the ADA wheelchair definition.

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 Metro Bus's training program.

Metro Bus has developed its training program iteratively with an emphasis on adult learning methods. While Metro Bus tries to recruit drivers with commercial drivers licenses (CDLs), it has also hired its own CDL trainers in order to expand its hiring pool. Metro Bus administers the State of Minnesota's CDL driver training program (20-50 hours depending on skills), and uses a third party vendor to administer the road test, saving time in "on-boarding" new drivers.

Training (classroom and driving) covers a range of topics, including:

- Eliminating distractions with emphasis on map reading and finding addresses
- Working with practice schedules
- Using data terminals (Rangers)
- Providing customer service
- Providing door-through-door service and passenger assistance, including ergonomics and understanding how people fall
- Applying the 20-minute pickup window
- Using safety and accessibility equipment including almost 3 hours working with different buses and different equipment
- Completing incident reports and defect cards

Drivers conduct practice runs using mock schedules until they are ready for revenue service. Metro Bus spends additional time as needed with new drivers and retrain as necessary.

The review team interviewed six drivers who answered questions consistently and with sensitivity to individuals with disabilities.

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: Not applicable. Metro Bus does not use contractors for any portion of its paratransit service.

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. Metro Bus does not use contractors 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: Not applicable. Metro Bus's local bus service does not adjoin or overlap with service of the service area of another public transit operator. Metro Bus does run commuter bus service (Northstar Link), but commuter bus service is not subject to this requirement.

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)	2 deficiencies	Metro bus denies eligibility to an applicant solely because the combined weight of the individual and his/her mobility device exceeds the capacity of its vehicles' lifts Metro Bus limits certain conditional eligibility determinations to a origin-destination pair or trip purpose	60/Jan-2017
4	Accessible information	37.125(b)	1 deficiency	Metro Bus does not publicize the availability of public information about Dial-a-Ride service in accessible formats	60/Jan-2017
5	Eligibility determinations within 21 days	37.125(c)	1 advisory comment		
6	Written eligibility determinations including specific reasons for denials or temporary or conditional eligibility	37.125(d)(e)	2 deficiencies	Metro Bus does not send written notification of eligibility to all applicants for Dial-a-Ride service Eligibility determination letter do not include information about whether the rider may need a personal care attendant	60/Jan-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)	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	No deficiencies		
10	Types of service	37.129	No deficiencies		
11	Service area	37.131(a)	2 deficiencies	Dial-a-Ride service area does not include all areas that are within 3/4-mile of Metro Bus fixed routes. Published service area map for Dial-a-Ride is not consistent with the required service area.	60/Jan-2017
12	Response time	37.131(b)	1 deficiency	Metro Bus does not accept requests for Dial-a-Ride trip reservations on weekend days during the same hours as its regular weekday business hours.	60/Jan-2017
13	Fares	37.131(c)	2 deficiencies	Metro Bus charges a fare for Dial-a-Ride in areas where the comparable fixed route trip is free. Metro Bus does not permit all Dial-a-Ride riders to travel with a companion if the companion is suspended from Dial-a-Ride service.	60/Jan-2017
14	No trip purpose restrictions	37.131(d)	1 advisory comment		
15	Hours and days of service	37.131(e)	2 deficiencies	Dial-a-Ride does not operate during certain hours when fixed route operates. Metro Bus's public information does not state the correct service hours for Dial-A-Ride.	60/Jan-2017
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		

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
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)	1 advisory comment		
20	No substantial numbers of trip denials or missed trips	37.131(f)(3)(i)(b) 37.131(3)(1)(b)	1 advisory comment		
21	No substantial numbers of trips with excessive trip lengths	37.131(f)(3)(i)(c)	1 deficiency	Metro Bus's definition for a long Dial-a-Ride long trip does not reflect comparability to fixed route travel time.	60/Jan-2017
22a	No operational patterns or practices significantly limiting service availability	37.131(f)	1 advisory comment		
23	Subscription Service	37.133	No deficiencies		
24	No-show, late cancel and reasonable service suspension & appeal policies	37.125(h)(1)-(3)	1 deficiency	Metro Bus does not have procedures to verify all potential no-shows before assessing no-shows to a rider.	60/Jan-2017
25	Complaint Resolution & Compliance Information	27.13(a)(b) & 27.121	2 deficiencies	Metro Bus does not advertise contact information for the staff member responsible for accepting ADA-related complaints. Metro Bus does not also promptly communicate complaint resolutions to complainants and document the dates of such communications.	60/Jan-2017
26	Nondiscrimination	37.5	2 deficiencies	Metro Bus Service Guide for Dial-a-Ride improperly refers to "personal hygiene" as an expectation for passengers. Metro Bus's Service Guide for Dial-a-Ride does not accurately reflect the proper ADA wheelchair definition.	60/Jan-2017

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
27	Training	37.173	No deficiencies		
28	Service under contract with a private entity	37.23	Not applicable		
29	Service provided by another public entity	37.21(b)	Not applicable		
30	Coordination of service	37.139(g)	Not applicable		

Attachment A
FTA Notification Letter to Metro Bus



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

Headquarters

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

May 17, 2016

Mr. Ryan Daniel
Executive Director
St. Cloud Metropolitan Transit Commission
665 Franklin Avenue, N.E.
St. Cloud, MN 56304

Dear Mr. Daniel:

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 St. Cloud Metropolitan Transit Commission (Metro Bus) has been selected for a review of its ADA paratransit service to take place during the week of July 19-22, 2016.

The purpose of this review will be to determine whether Metro Bus 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 **9 a.m. on Tuesday July 19, 2016**, to introduce the Collaborative team and FTA representatives to Metro Bus, including you or your designee, the director of Metro Bus's Dial-a-Ride 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 Dial-a-Ride offices for the duration of their visit. Please let us know if you will designate a member of your staff to serve as Metro Bus'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 **Friday June 17, 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 July 19, 2016 after the opening conference.

We request the exit conference be scheduled for **2 p.m. on Friday July 22, 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 Metro Bus's Dial-a-Ride 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 Metro Bus, will be considered public documents subject to release under the Freedom of Information Act, upon request.

Metro Bus 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 Metro Bus staff.

Sincerely,



John Day
Program Manager for Policy and Technical Assistance

cc: Marisol Simon, FTA Region V Administrator
Marjorie Hughes, FTA Region V Civil Rights Office

Enclosure 1

The following information must be submitted to the Collaborative by Friday June 17, 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

St. Cloud MTC: 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
Metro Bus Response to Draft Report

From: Ryan Daniel

Sent: Tuesday, November 15, 2016 4:08 PM

To: Day, John (FTA)

Cc: Berry, Britney (FTA); Mitchell, Yolanda CTR (FTA); Hughes, Marjorie; Simon, Marisol (FTA); Tom Cruikshank; P Mastey

Subject: RE: St. Cloud Paratransit Review Draft Report

Good Afternoon Mr. Day,

Metro Bus reviewed the draft report. We didn't find any factual errors nor do we have any comments at this time. Metro Bus will address all deficiencies within 60 days.

Warm Regards,

Ryan I Daniel WSO-CSS

Chief Executive Officer Voice 320.529.4482 | Fax 320.257.7682

St. Cloud Metropolitan Transit Commission

665 Franklin Ave NE

St. Cloud, MN 56304

METRO BUS

SAFE, RELIABLE & FRIENDLY

AMERICA'S BEST TRANSIT SYSTEM IN 1990 & 2007

AMERICA'S BEST URBAN TRANSIT SYSTEM IN 2014

MINNESOTA'S BEST TRANSIT SYSTEM IN 2015

Attachment C
Dial-a-Ride Application Form



DIAL-A-RIDE SERVICE APPLICATION INSTRUCTIONS

Metro Bus Dial-A-Ride service is available for individuals with disabilities who are unable to ride Fixed Route* buses. This is a shared ride, door-through-door driver-assisted service**, which requires advance reservations. Users must complete an eligibility process before using the service. This process starts with completing the enclosed application.

Dial-a-Ride is intended only for those trips that the person cannot make on Fixed Route buses. This application is intended to determine when and under what circumstances the applicant can use Metro Bus Fixed Route buses and when Dial-a-Ride is required.

Please read instructions carefully before completing the enclosed application.

If you have questions about Dial-a-Ride Eligibility, please call 320.529.4495. If you need help filling out the application form, the interviewer will assist you at the interview.

Please note that eligibility for Dial-a-Ride is a transportation decision, not a medical one.

Determinations are based upon a person's functional ability to use accessible Fixed Route buses. Eligibility determinations are not solely based on disability, age or medical diagnosis. Perceived inconvenience, real inconveniences or simply a desire not to use accessible Fixed Route bus service are not criteria for eligibility.

*Fixed Route buses are the large transit buses operated on set routes by Metro Bus.

**Door-through-door driver-assisted service means drivers will assist all passengers through the first door of a building [first door definition is "giving inside access to the building"] at both their point of origin and their destination.

HOW TO APPLY

To help us accurately determine your eligibility for Dial-a-Ride, please fill out the enclosed application form as completely and thoroughly as possible.

Applications that are not complete or clearly written will be returned, which will delay the eligibility determination process.

Once the application is received, you will be contacted to set up an in-person interview.

If you need transportation to the interview, let us know when we call. Your ride will be provided free of charge.

WHAT WILL HAPPEN AT THE INTERVIEW?

1. We will review the application form with you and will ask you additional questions about your ability to use Fixed Route buses.
2. We may ask you to participate in a functional assessment so we can further evaluate your travel abilities and limitations. The assessments will be at the same location as the interview. Please come dressed in appropriate attire for a possible outdoor functional assessment.

WHEN AND HOW WILL YOU FIND OUT IF YOU ARE ELIGIBLE?

You will be notified of your eligibility by letter, either in person on the day of your interview or by mail following the interview. This decision will be made within 21 days of the date we receive your application. If a decision is not made in 21 days, we will provide you with Dial-a-Ride until a final decision is made.

If you are determined eligible for Dial-a-Ride, you will be given a Dial-a-Ride Service Guide with information about the service. If it is determined that you are able to use Fixed Route buses for some or all of your trips, you will be notified in writing of the exact reasons for this decision and information will be provided about how to appeal our decision.

**If you have questions about Dial-a-Ride Eligibility, please call 320.529.4495.
If you need help filling out the application form, the interviewer will assist you at the interview.**

Mail or fax completed applications to:

Metro Bus

700 West St. Germain St, Ste. 100
St. Cloud, MN 56301

Phone: (320) 529.4495

Fax: (320) 257.7695

Email: info@stcloudmtc.com

Website: www.ridemetrobus.com

If the application is faxed, please mail the original or bring it to the interview.

Office Use Only
 Date Application Received: _____
 New Application Recertification
 Interview Date: _____
 Assessment Date: _____
 Eligibility Determination: _____
 Certification Date: _____
 Expiration Date: _____
 Travel Training: _____

APPLICATION

PART A: GENERAL INFORMATION

Please indicate below the reasons why you are seeking ADA Dial-a-Ride eligibility (check all that apply):

- I can use Metro Bus Fixed Route buses to go some places, but in other places I cannot get to or from the bus stop.
- I can use Metro Bus Fixed Route buses sometimes but only if they are accessible by means of ramp or lift.
- Because of my disability, I can never use Metro Bus Fixed Route bus service.

APPLICANT NAME: (PLEASE PRINT)

First Name: _____ Middle Initial _____
 Last Name: _____ Sex: Male Female
 Street Address: _____ Apt # _____
 City: _____ State _____ Zip _____
 Date of Birth: _____ Phone Number: _____
 What is your preferred language? _____
 Email Address _____

Please give us the name and phone number of a friend or relative we can call in case of an emergency, or if we are unable to reach you at your regular number:

Name: _____
 Relationship: _____
 Phone [daytime]: (____) _____ [evening]: (____) _____

PART B: APPLICANT'S INFORMATION

1. What type or types of disabilities prevent you from using Metro Bus Fixed Route buses.
(Check all that apply)

- | | |
|---|--|
| <input type="checkbox"/> Physical disability | <input type="checkbox"/> Visual impairment/blindness |
| <input type="checkbox"/> Developmental disability | <input type="checkbox"/> Mental illness |
| <input type="checkbox"/> Other | <input type="checkbox"/> None |

Please describe your disability in more detail:

2. Is the disability above permanent or temporary?

- | | |
|---------------------------------------|---|
| <input type="checkbox"/> Permanent | <input type="checkbox"/> Temporary, I expect it to last for another __ months |
| <input type="checkbox"/> I don't know | |

3. Please indicate below if you use any of the following mobility aids or equipment.

- | | | |
|--|--|---|
| <input type="checkbox"/> Cane | <input type="checkbox"/> Manual wheelchair | <input type="checkbox"/> Service animal |
| <input type="checkbox"/> White cane | <input type="checkbox"/> Powered wheelchair | <input type="checkbox"/> Communication device |
| <input type="checkbox"/> Walker | <input type="checkbox"/> Powered scooter or cart | <input type="checkbox"/> Portable oxygen |
| <input type="checkbox"/> Crutches | <input type="checkbox"/> Alphabet Board | |
| <input type="checkbox"/> Other (please describe) _____ | | |

I do not use a mobility aid or equipment

4. If you use a wheelchair or scooter:

Is it more than 30 inches wide? Yes No

Is it more than 48 inches long? Yes No

Is the combined weight of the device and the occupant more than 800 pounds?

Yes No

5. When using Metro Bus Dial-a-Ride, does your health condition or disability require you to travel with a personal care attendant (PCA)?

Yes No Sometimes

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

PART C: YOUR CURRENT USE OF METRO BUS FIXED ROUTE BUS SERVICE

(This section **does not pertain to Dial-a-Ride**. The questions are asking about your use of Metro Bus Fixed Route bus service.)

1. Have you ever used Metro Bus Fixed Route bus service? (**Fixed Route means the large transit buses operated on set routes by Metro Bus**)
 - Yes, I typically use Metro Bus Fixed Route ____ times a week
 - Yes, I used to but stopped because _____
 - No

2. If you don't use Fixed Route bus service, explain what **prevents** you from independently using it? _____

3. Do you know which Metro Bus Fixed Route(s) serve your neighborhood?
 - Yes No If yes, which routes? _____

4. If you use Metro Bus Fixed Route service now, which routes do you use?

5. What is the closest Fixed Route bus stop to your home? Please give the location (Ex. Corner of 1st Street and 6th Avenue) _____

6. Can you get to this bus stop by yourself? Yes No Sometimes
If No, why not? _____

7. What might help you in being able to ride Metro Bus Fixed Route buses?
(Check all that apply)
 - Improved route and schedule information
 - Learning to use Metro Bus Fixed Route with travel training
 - Buses being wheelchair accessible
 - Only if there are curb-cuts and level sidewalk
 - If the bus stop was closer to where I live and where I need to go
 - I would need a communication aid
 - Other, describe _____

8. Using a mobility aid or on your own, how far are you able to travel?
 - I am unable to walk or transport myself outside my home or apartment
 - I can walk or transport myself less than one block
 - I can walk or transport myself up to ¼ mile (3 blocks)
 - I can walk or transport myself up to ½ mile (6 blocks)
 - I can walk or transport myself up to ¾ mile (9 blocks)
 - I can walk or transport myself more than ¾ mile

PART C CONTINUED

9. Does the weather have an effect on your ability to use Metro Bus Fixed Route?

- Yes No I don't know

If you answered yes, how does the weather affect your ability to use the Fixed Route bus service? _____

10. I am able to wait at the bus stop for a Fixed Route bus (check all that apply)

- Only if there is a bench or shelter
 For no more than 15 minutes
 For more than 15 minutes

PART D: WHERE YOU GO AND HOW YOU GET THERE NOW

To assist with your mobility assessment, please list three places you go most often and how you get there now.

1. Destination _____
Address _____
How often do you go there? _____
How do you get there now? _____

2. Destination _____
Address _____
How often do you go there? _____
How do you get there now? _____

3. Destination _____
Address _____
How often do you go there? _____
How do you get there now? _____

PART E: SIGNATURE INFORMATION

Please Complete Box A, unless you are a Minor or have a Legal Guardian, in that case your Parent or Legal Guardian should complete Box B.

A. I understand that the purpose of this application is to determine if I am eligible to use Metro Bus Dial-a-Ride. I certify that the information provided in this application is true and correct. I understand that falsification of information could result in a loss of Metro Bus Dial-a-Ride riding privileges as well as a penalty under the law. I agree to notify Metro Bus if I no longer need to use Dial-a-Ride.

_____ Date _____
Signature of Applicant

B. I understand that the purpose of this application is to determine if the Applicant is eligible to use Metro Bus Dial-a-Ride. I certify that the information provided in this application is true and correct. I understand that falsification of information could result in a loss of Metro Bus Dial-a-Ride riding privileges as well as a penalty under the law. I agree to notify Metro Bus if the Applicant no longer needs to use Dial-a-Ride.

I consent to the Applicant's interview and any possible assessment of his/her travel abilities and limitations to determine Dial-a-Ride eligibility.

_____ Date _____
Signature of Parent or Legal Guardian

If someone assisted in completing this application, please provide the following information:

Print name _____

Relationship to applicant _____

Address _____

Agency _____ Phone (____) _____

AUTHORIZATION FOR RELEASE OF MEDICAL RECORDS

(Must be completed by **Applicant**)

Disability verification by a qualified professional does not guarantee eligibility for Dial-a-Ride transportation, but it **can** play a major role in the eligibility determination process. While verification by a physician or licensed medical professional is **not required**, there are times when it may be important to obtain information from them to verify an individual's disability. It is important to note that the professional should be familiar not only with that person's particular disability, but also with his/her ability or inability to travel on a regular Metro Bus Fixed Route.

Statement of Release

I, the undersigned, understand that the medical information requested is confidential and will not be shared with any other person or agency, with the possible exception of another transit provider or transportation program to facilitate travel. I authorize the release of any and all medical records and/or information by the professional listed below to Metro Bus for the express purpose of determining my eligibility for Dial-a-Ride transportation.

Qualified Professionals

Note: Only the following professionals are authorized to verify your disability: Licensed Physician or Registered Nurse, Licensed Independent Clinical Social Worker, Psychologist/Psychiatrist, Occupational or Physical Therapist, Certified Rehabilitation Counselor, Orientation and Mobility Specialist, Independent Living Specialist.

Name of Professional _____

Address _____

City _____ State _____ ZIP _____

Office Telephone Number _____

Applicant Name _____
(please print)

Applicant Signature _____ Date _____
(Required)

This authorization expires one year from date of authorization

Attachment D
Dial-a-Ride Service Guide

Metro Bus Dial-a-Ride Service Guide



METRO BUS
dial-a-ride services





Serving St. Cloud
Sartell, Sauk Rapids
and Waite Park,
Minnesota

St. Cloud Metropolitan
Transit Commission
665 Franklin Ave NE,
St. Cloud, MN 56304
320.251.1499

fax:
320.251.3499

email:
info@stcloudmtc.com

web:
ridemetrobus.com

Metro Bus Mobility
Training Center
700 West St. Germain
St. Cloud, MN 56301

320.529.4497

fax:
320.257.7697

email:
info@stcloudmtc.com

web:
ridemetrobus.com

METRO BUS Dial-a-Ride Guide

TABLE OF CONTENTS	1
METRO BUS DIAL-A-RIDE OVERVIEW	2
Service Availability and Hours.....	3
Dial-a-Ride Personnel	3
Service Area Map	4
CERTIFICATION & ELIGIBILITY	5
Eligibility.....	5
Applying for Dial-a-Ride	5-6
Appeals Process.....	7
Recertification	7
SCHEDULING RIDES & POLICIES	8
Scheduling a Trip.....	8
Subscription Trips	9
Canceling a Scheduled Trip.....	9
No-Show Policy.....	9-10
RIDING DIAL-A-RIDE SERVICE	11
Door-through-Door Service	11
Paying for Your Trip (Fares)	11-12
Personal Care Attendant (PCA)	12
Traveling Companions	12
Out of Town Visitors	12
Wheelchairs.....	13
Steps, Ramps, Sidewalks & Driveways.....	13
Animals.....	14
Children	14
Seat Belts.....	14
Grocery and Shopping Bags	14
CUSTOMER SERVICE (Comments or Complaints)	15
METRO BUS OPERATING POLICIES	16

DIAL-A-RIDE OVERVIEW

Dial-a-Ride is a driver-assisted, door-through-door, shared ride bus service for people with disabilities.

Dial-a-Ride is for residents of St. Cloud, Waite Park, Sauk Rapids and Sartell to get to and from activity centers, medical facilities, work, school, grocery shopping and other community functions.

These program guidelines describe the process of applying for Dial-a-Ride along with information on policies, procedures, and the responsibilities of both the passenger and Metro Bus.

Following the policies and procedures outlined in this Service Guide will ensure that Metro Bus Dial-a-Ride operates successfully for everyone.

The federal Americans with Disabilities Act (ADA) provides the framework that Metro Bus must follow when providing Dial-a-Ride, which is referred to as “complementary paratransit” service in the transit industry.

The ADA establishes minimum requirements for complementary paratransit services on such matters as fares, operating hours, service area and other elements of the program.

Metro Bus Dial-a-Ride is funded primarily through an appropriation from the Minnesota State Legislature, with passenger fares and local and federal funding accounting for the balance of operating revenue.

Mission Statement

The Mission of the St. Cloud Metropolitan Transit Commission is to provide quality alternative transportation services that meet diverse mobility needs and enhance the quality of life of our community. We strive to provide these services in an effective and financially responsible manner that is sensitive to the needs of our customers and citizens.

Dial-a-Ride Availability and Hours

Dial-a-Ride operates comparable hours to Fixed Route. Specific times vary by geographic area. Generally this is:

Mon-Fri: 5:30 am- 9:00 pm

Sat: 8:00 am- 6:30 pm

Sun: 9:00 am- 6:00 pm

There is no service on New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. Service ends early on Christmas Eve.

Dial-a-Ride Personnel

All Metro Bus drivers wear uniforms that clearly identify them as Metro Bus personnel. Drivers receive training in defensive driving, First Aid and customer relations.

They also receive passenger sensitivity training to help them understand and respond to the special needs of Dial-a-Ride passengers.



CERTIFICATION & ELIGIBILITY

Eligibility

To be eligible for Dial-a-Ride an individual:

- Must be unable to board, ride, or disembark a Fixed Route Metro Bus, or access the Fixed Route system due to a combination of a disability and physical barrier (i.e. distance to bus stop, terrain, etc.)
- Uses a personal oxygen supply or ventilator.

Ineligible for Dial-a-Ride:

- A person requiring external life support equipment or immediate/emergency medical transportation.

Applying for Dial-a-Ride

1) Application: The Dial-a-Ride application is available online at ridemetrobust.com or by calling 320.529.4495.

2) Interview: After Metro Bus receives the application, an interview will be scheduled.

At the interview:

- the application will be reviewed;
- questions will be asked about applicant's ability to use the Fixed Route bus system;
- a cognitive or physical functional assessment may be performed.

If transportation is needed to the interview, Metro Bus will provide a ride free of charge. The applicant should come dressed in appropriate attire for a possible outdoor functional assessment.

Eligibility determination will be made within 21 business days of receipt of application.

3) Determination: Following the interview process, a written notification regarding the applicant's eligibility will be mailed.

Eligibility for Dial-a-Ride is a transportation decision, not a medical one.

Determinations are based not on the presence of a disability, but on the effect the disability has on an individual's capacity to use Fixed Route bus service. Perceived inconvenience, real inconveniences or simply a desire not to use accessible Fixed Route bus service, are not criteria for eligibility.



Approval

If approved for service, the applicant will receive an identification card that includes name, and expiration date. The card also includes information about how to schedule a ride.

Once approved for service, the applicant must communicate changes in disability status or home address to Metro Bus. If an individual's use of a mobility aid changes, such as switching from using a walker to using a wheelchair, this should also be communicated to Metro Bus.

Approval is given in the form of certification. There are five types of certifications:

Types of Certification

- 1. Unconditional:** Allows use year-round and under any condition.
- 2. Conditional:** Allows use under certain conditions based on a disability. An example of a conditional certification is that an applicant is only eligible for Metro Bus Dial-a-Ride when there is snow or ice present. At times of the year when the weather does not include the presence of snow or ice, the applicant is able to utilize the Fixed Route bus system.
- 3. Temporary:** Allows use when disability is temporary for a limited, specific amount of time due to post-operative recovery, broken bones, etc.
- 4. Non-Resident:** If the applicant lives outside the Metro Bus transit service area and meets the eligibility criteria, he or she may use Dial-a-Ride for trips within the service area.
- 5. Visitor:** Allows use when visiting and staying in Metro Bus service area. Must prove eligibility by presenting an identification card from their local public transportation program, or prove mobility impairments, such as use of a wheelchair or other mobility aid. Using the service longer than 21 days in a 365-day period of time requires completion of application.

Appeals Process

If an individual is determined ineligible and denied service, or given a conditional or temporary certification for Dial-a-Ride, the written notification shall state the reason for the decision. The applicant may appeal the decision by following the information in the Notice of Right to Appeal.

All appeals must be in writing and presented within 60 days of receipt of the letter stating the eligibility determination. Upon receipt, the appeal will be date stamped and referred to the Community Outreach & Travel Training Manager for initial review and consideration. The Community Outreach & Travel Training Manager will decide to either reverse a determination of eligibility or schedule the matter for a hearing at the next Appeal Committee meeting. The Appeal Committee regularly meets on the third Tuesday of every month at 11:30 a.m. Appointments may be made to appear before the Appeal Committee by calling 320.252.1010.

After the Appeal Committee has received, reviewed and considered the material presented as part of the Appeal process, they shall render a final decision and shall direct the Community Outreach & Travel Training Manager to prepare a letter to the applicant regarding its determinations. The Appeal Committee will specify, and the letter shall explain in detail, the reasons for their decision.

Reapplying for Service: If an applicant is denied eligibility, the applicant may reapply if there are substantial new or different conditions which cause a significant change in physical or mental capabilities.

Recertification

All Dial-a-Ride passengers, whether they have been approved for an unconditional or conditional certification, must be recertified for service every three years. A reminder notice will be sent by mail at least 60 days prior to their expiration date. Those who still need Dial-a-Ride transportation may reapply for the service. Recertification may be identical to the certification process; however, Metro Bus reserves the right to waive this process or any portion of it.

SCHEDULING RIDES & POLICIES

Scheduling a Trip

To schedule a ride, call the Dial-a-Ride dispatch office at 320.252.1010.

Drivers cannot take appointments or make changes to any previously scheduled rides.

Please provide the following information:

- a passenger name
- origin address
- destination address
- desired destination arrival time
- whether a companion or Personal Care Attendant will be accompanying for each trip scheduled

The caller will be provided with scheduled pick-up and return times. All passengers should be ready and waiting at the first door (first door definition is “giving inside access to the building”) of the building from which they are being picked up. Please allow 15 minutes to pass beyond the scheduled pick-up time before calling the office to inquire about the ride. Return trips for medical appointments can be scheduled when the initial ride is requested or can be called in when the medical appointment is completed.

Advance Notice Requirement: Rides may be scheduled between one and seven days in advance. Every effort will be made to schedule trip requests at the specific time desired; however, because this is a shared ride

Scheduling Rides for Dial-a-Ride

Call 320.252.1010

Monday - Friday
6:30 am to 6:30 pm

Saturday & Sunday
9:00 am to 5:00 pm

service (see below) earlier or later pick-up times may be suggested to accommodate the most passengers per bus. Dial-a-Ride does not provide emergency medical transportation.

Passengers are responsible for remembering their scheduled pick-up and return times. Drivers cannot provide this information. If verification of scheduled rides is needed, please call the Dial-a-Ride dispatch office at 320.252.1010.

Shared-Ride System: The Dial-a-Ride program operates on a shared-ride basis. This means that other passengers may be on board during any part of a trip, and that scheduled pick-up times or routes of travel may be altered to accommodate another passenger. It is likely that your ride won't always be a direct route to your destination without any stops. All trips will be coordinated to carry as many passengers as possible to help lower the cost of service.

Subscription Trips

Subscription Service may be available for those who travel to the same place, at the same times, several days a week. To be considered for Dial-a-Ride Subscription service, all of the following criteria must be met:

- Certified to use Metro Bus Dial-a-Ride, except those with Temporary or Visitor certifications
- Request is for travel to the same destination at the same time — at least three times a week

To be considered for Subscription Service, please complete the Subscription Request Form, available at ridemetrobus.com or by calling 320.252.1010.

Subscription Service requests are reviewed the first Monday of each month and the five working days following. Approval is based on meeting the set criteria, as well as the availability of service.

Subscription trips may be put on hold for up to 30 days. If a rider does not resume subscription trip within 30 days, it will be removed and rescheduled through the subscription trip request process. Subscriptions have no expiration. If there are any changes made to the subscription (day, time or destination) it may be canceled and will be reinstated, if there is availability. If a rider cancels 50% or more of their trips in the month, subscription service may be removed.

Canceling a Scheduled Trip

If a trip has been scheduled that will not be used, please cancel it as far in advance as possible. To avoid a no-show, a scheduled pick-up time must be cancelled at least two hours in advance.

No-Show Policy

A no-show occurs when an individual schedules a ride and fails to use the service by missing their scheduled ride or does not give sufficient cancellation notice (less than 2 hours).

If an individual receives more than five (5) no-shows in a 30-day period AND the no-shows equal more than 10% of their total trips scheduled for that 30-day period of time, they will be suspended. The 30-day period of time is determined by the date of the first no-show.

When an individual receives a no-show, a letter will be sent to them containing information about when the no-show occurred and will give instructions for how to appeal the no-show. Individuals have 10 business days from receipt of the letter to notify Metro Bus that they wish to appeal the no-show. The appeal may be in writing, by phone, or in person to Metro Bus. Metro Bus will reply in writing or by phone to the individual within 10 business days of receipt of the appeal notice with a determination of the validity of the no-show.

An individual who receives a sixth (6) no-show (and their no-shows equal more than 10% of their total trips for a 30-day period of time) will be notified by letter that they will be suspended. The suspension will go into effect fifteen (15) days from the date of the letter. Metro Bus administrative staff will issue the suspension.

Individuals wishing to appeal the suspension may do so by notifying Metro Bus and attend the next Dial-a-Ride Appeal Committee meeting to discuss the reasons for the no-shows. During the time period of the appeal, the suspension will be put on hold. The Appeal Committee may either dismiss one or all of the no-shows or make a final determination to uphold the suspension.

If an individual goes one year without any suspensions (counting from the previous suspension's start date), their next suspension will revert back to a 1st Suspension of seven (7) days.

The Dial-a-Ride Appeal Committee meets the third Tuesday of each month at 11:30 a.m. at the Mobility Training Center, 700 W. St. Germain St, St. Cloud, MN 56301.

1st suspension – loss of Dial-a-Ride privileges for seven (7) days.

2nd suspension – loss of Dial-a-Ride privileges for fourteen (14) days.

3rd suspension – loss of Dial-a-Ride privileges for twenty-one (21) days.

4th suspension – loss of Dial-a-Ride privileges for thirty (30) days.

Metro Bus Dial-a-Ride is a shared-ride service, so it is important that scheduled trips do not go unused.

Consideration will be given for no-shows that are beyond the passenger's control, which could include any of the following:

- 1) the vehicle arrived at the pick-up location late and the passenger was not ready, had left to call, or made other arrangements;
- 2) a sudden personal or family emergency arose that caused the passenger to change plans and did not allow time to notify dispatch; or
- 3) a sudden turn for the worse for a passenger with a variable condition.

RIDING DIAL-A-RIDE SERVICE

Door-Through-Door Service Policy

Door-through-door service means that drivers will assist all passengers through the first door of the building (first door definition is “giving inside access to the building”) at both their point of origin and their destination.

Driver assistance ends when the driver has assisted the passenger through the first door of the building. **Drivers are not allowed to assist beyond this point.** Passengers who require further assistance once inside the first door of a building are responsible to have a Personal Care Attendant, companion, or other individual present to assist them. The Dial-a-Ride driver reserves the right to refuse loading at a location where the lift or ramp cannot be physically deployed due to the location being deemed as unsafe to the driver and/or passenger.

Passengers must be prepared and ready at the first door at their scheduled pick-up time in order to keep the bus on schedule. If the driver arrives and the passenger is not ready at the first door, the driver is allowed to leave one minute after the scheduled pick-up time, which will result in a no-show for the passenger.

Paying for your Trip (Fares)

Fares: A fare is required for each one-way trip. Individual fares cannot be paid round-trip, in advance or billed at a later date. Passengers are asked to have their passes ready to swipe through the farebox upon boarding the bus. When paying a fare with cash, any amount over the cost of the ride will be given in the form of a debit change card, which can be used for future rides.

Up to two children, five and under, ride free with a paid fare on any Metro Bus. However, if a child, regardless of age, is certified with Dial-a-Ride, a fare must be paid. Up to two fare-paying companions or a non-farepaying Personal Care Attendant may accompany the certified child.

Agency Fare: When Metro Bus transports an individual or group of individuals for an “Agency Trip”, each trip will be billed directly to the participating agency or organization through a contractual agreement. Agency trips are when an agency (such as social service agency, residential care facility, or other organization) schedules a guaranteed trip for a resident, client, or group for attending a function of the agency or organization.



Types of Fares

- **Cash Fare**
- **31-Day All Service Pass**
Unlimited ridership on all Metro Bus routes and Dial-a-Ride during the 31 days following the first time the pass is activated.
- **10-Ride Pass** Good for 10 rides, no expiration.

Call 252.1010 for current fare prices. Passes may be purchased online at ridemetrobust.com, at the Metro Bus Transit Center, major grocery stores (service counter).

Receipts: Metro Bus does not provide receipts for rides taken. Individuals who need this information for income verification are responsible for keeping their own records.

Personal Care Attendant (PCA)

One Personal Care Attendant (PCA) can accompany a certified Dial-a-Ride passenger at no charge. A PCA is defined as a person who provides care for the certified individual and who is a necessary part of the individual's mobility. The certified individual's application will need to indicate that he or she, at times, requires the assistance of a PCA. The need for a PCA will be noted in the certified individual's client file. A PCA's ride must be scheduled with the dispatcher in advance to allow for seating in the vehicle. The PCA must board and deboard the vehicle at the same locations as the certified

individual. **Metro Bus Dial-a-Ride does not provide PCA's for riders.**

Traveling Companions

One companion may ride with a certified Dial-a-Ride individual. However, additional companions may ride only if there is sufficient vehicle capacity as determined by the Dial-a-Ride dispatcher. Companions traveling with a certified individual must pay the one-way trip fares each time they ride. Companions must board and deboard from the vehicle at the same location as the certified individual. A certified individual suspended under the Guidelines cannot travel as a companion of another certified individual under this section.

Out of Town Visitors

Since eligibility criteria established by the ADA are standard throughout the country, ADA-certified visitors can use Dial-a-Ride anywhere within the St. Cloud transit area (which includes St. Cloud, Sauk Rapids, Waite Park and Sartell). Visitors do not need to apply for certification in the city they are visiting and are permitted to use the service on any combination of 21 days throughout a 365-day period beginning with the visitor's first use of the service during such 365-day period.

It is important to call ahead at 320.252.1010 when planning to use Dial-a-Ride, because policies and procedures vary from city to city.

Wheelchairs

A wheelchair is defined by the ADA as a mobility aid belonging to any class of three or four-wheeled devices, usable indoors, designed for and used by individuals with mobility limitations, whether operated manually or powered.

According to the ADA, in order to be carried in any Metro Bus vehicle, such a device cannot exceed 30 inches in width and 48 inches in length when measured two inches above the ground.

Metro Bus is unable to provide service if the combined weight of the rider and the wheelchair exceeds 800 pounds.

Metro Bus Dial-a-Ride does not transport mobility devices without the rider.

Wheelchair securement and restraints:

Metro Bus Dial-a-Ride vehicles are equipped with securement devices to keep wheelchairs from moving while on the vehicle. Metro Bus Dial-a-Ride drivers are trained in, and responsible for, properly securing wheelchairs. Riders are required to wear the vehicle-equipped seat belt and restraints.

Broken wheelchairs: Mobility devices must be in good working order when traveling on the Metro Bus Dial-a-Ride service. Flat tires, brakes that do not hold, power chairs without power, loose handgrips, and bent or loose wheels are safety hazards. **Drivers may refuse to provide a ride if a wheelchair is unsafe.**

Scooter-type Wheelchairs

It should be noted that occupied scooter-type wheelchairs have been shown to be unstable during transport. When possible, riders should transfer from the scooter to a vehicle seat while in route.

It is Metro Bus policy that scooter/carts can be tied down and the passenger will not be required to transfer to a seat. However, if the driver determines that a cart cannot be secured because of the style of the cart or if the passenger prefers a bus seat, he or she should be transferred to a seat.

Steps, Ramps, Sidewalks & Driveways

Drivers will assist ambulatory passengers in entering and exiting all buildings provided there are no more than five steps to maneuver or ascend/descend. For the safety of both the driver and the passenger, drivers are not permitted to assist passengers who use a wheelchair up and down any steps. Curbs are not included as steps.

Steps, ramps, sidewalks and driveways must be free of ice, snow and debris. For both riders' and drivers' safety, service may be refused if drivers determine that assisting a particular rider is unsafe. If service is refused, the driver will notify the Metro Bus Dial-a-Ride supervisor. A liaison may be asked to inspect and evaluate the situation and explain what corrections must be made in order for service to resume.

Animals

Service animals are animals that are individually trained to perform tasks for people with disabilities — such as guiding people who are blind, alerting people who are deaf, pulling wheelchairs, alerting and protecting a person who is having a seizure, or performing other special tasks. A service animal must be under the constant control of its owner or handler. Service animals are working animals, not pets.

Riders should inform dispatch when service animals will be accompanying them. **There is no additional fare charged for a service animal.**

Metro Bus Dial-a-Ride can transport non-service animals on a space-available basis, provided that the animals are properly caged. Drivers are not permitted to carry cages.

Children

Up to two children, five and under, ride free with a paid fare on any Metro Bus. Additional children or children over the age of five must pay a fare. If the child is certified to use Dial-a-Ride, a fare is required to be paid.

Strollers: Baby strollers must be folded and stored in a manner as to not interfere with other passengers or the operation of the bus. Under no circumstances shall a bus operator allow a child to remain seated in a stroller while the bus is in motion.

Seat Belts

All non-wheelchair passengers must use a seat belt if one is available. For those riding in a wheelchair, the driver will secure the wheelchair tie-down devices and engage separate seat belts.

Grocery and Shopping Bags

Passengers are allowed to bring on the bus as many packages as they are capable of carrying in one trip. Drivers are only allowed to assist with two grocery bags or one cardboard grocery box. If help is needed for additional packages, a companion must be available to assist the passenger.

CUSTOMER SERVICE (Comments and Complaints)

Customer service is a very important part of the Metro Bus Dial-a-Ride service.

Our goal is to provide passengers with a safe and enjoyable ride.

Metro Bus Dial-a-Ride employees are highly trained professional drivers and dispatchers.

When using the Dial-a-Ride service, customers can expect to be treated in a courteous manner by a staff that has a goal of providing the best service possible.

Customer Service is responsible for obtaining and documenting information, forwarding it to the appropriate department and following up to ensure issues are resolved in a timely manner.

To assist the Customer Service representative in researching an issue, the following information is needed:

- Date and time of incident
- Name of passenger
- Phone number
- Employee name, if known
- Bus number
- Details of incident

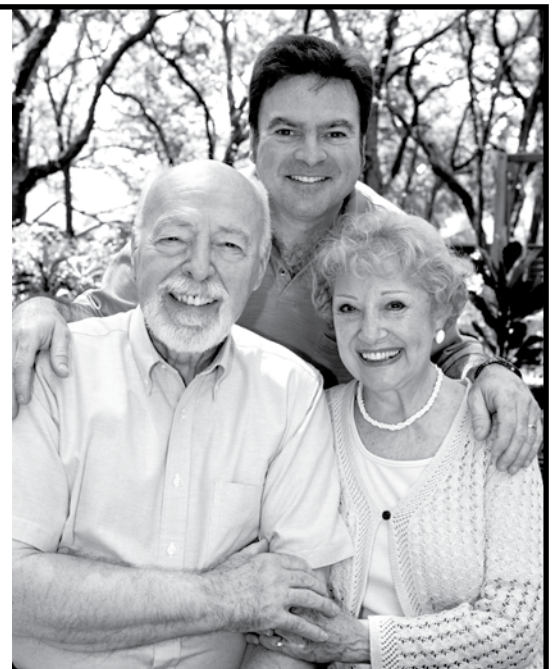
Please let the Customer Service representative know if you would like to receive a follow-up call once the issue has been researched. It is important to report any comments or complaints as soon as possible, while the details are clear.

Increase your independence

Riding the Fixed Route may work better for some of your trips. The Fixed Route allows you more flexibility and spontaneity. You don't have to call ahead to plan your trip, and you can extend your stay at your destination without worrying about missing your scheduled pick-up time. All buses are wheelchair accessible.

Learning how to ride Fixed Route will not affect your eligibility status for Dial-a-Ride, and we'll provide free training. We work with you at your pace until you feel comfortable to ride on your own.

**Learn more about Travel Training:
320.529.4497.**



METRO BUS OPERATING POLICIES

Disruptive Passenger Policy

Metro Bus prohibits passengers from disturbing the peace and quiet of another person or the transit bus operator. Disturbing the peace includes but is not limited to: offensive odors, verbal outbursts and visual disturbances. Metro Bus reserves the right to refuse entry aboard the bus or removal from the bus. Disruptive behavior while being transported by Dial-a-Ride may result in a temporary suspension of riding privileges.

Beverage Policy

Persons entering the bus with hot beverages must have them in a sealed, travel mug with a lid.

This does not include paper or Styrofoam containers with lids.

Cold beverages must be in a plastic bottle with a replaceable top, or a travel mug.

Roller blades/In-Line Skates

Passengers wearing Roller blades and wishing to board the bus shall first remove their Roller blades prior to boarding the bus, and shall not put them back on until they have deboarded the bus.

It will be acceptable for such passengers to board and ride the bus in their stocking feet.

EXPECTATIONS

What passengers should expect from the Metro Bus Dial-a-Ride program, its drivers and staff:

- Courteous and professional telephone staff
- Drivers who have successfully completed all necessary training needed to be a Metro Bus Dial-a-Ride driver
- Door-through-door assistance from driver
- A safe ride
- Drivers who are appropriately dressed and groomed
- Drivers and staff who can communicate with riders in spoken and written English
- A properly maintained vehicle, free of smoke and litter
- Prompt response to customer-service issues when requested

What the Metro Bus Dial-a-Ride program, its drivers and its staff expect from Passengers:

- Respect toward drivers, other riders and staff
- No eating, drinking or smoking on the vehicle
- Appropriate personal hygiene
- Personal assistive devices that are in good working order
- Steps, ramps, sidewalks and driveways that are clear of snow and ice
- Rides that are free of disruptive behavior
- Adherence to scheduling policies (i.e. ready and waiting at the first door of the building at your scheduled pick up time)



**FOR RESERVATIONS, CANCELLATIONS OR CUSTOMER
SERVICE CALL320.252.1010**

Call up to 7 days ahead for a reservation

Metro Bus Dial-a-Ride and Metro Bus
Fixed Route Services are operated by the
St. Cloud Metropolitan Transit Commission.
665 Franklin Ave NE, St. Cloud MN 56304

Attachment E
Notice of Right to Appeal



Serving St. Cloud,
Sartell, Sauk Rapids
and Waite Park,
Minnesota

St. Cloud Metropolitan
Transit Commission
665 Franklin Ave. NE
St. Cloud, MN
56304

320.251.1499

fax:
320.251.3499

email:
info@stcloudmtc.com

web:
ridemetrobust.com

Commissioners:
Chair:
Dave Kleis

Vice Chair:
Rick Miller

Treasurer:
Kurt Hunstiger

Secretary:
Amy Braig-Lindstrom

Member:
John Libert

Executive Director:
Ryan I. Daniel

NOTICE OF RIGHT TO APPEAL

Pursuant to U.S. Department of Transportation regulations implementing ADA paratransit requirements (49 CFR, Part 37, Subpart F, Section 37.125(g)), you have the right to appeal any determination stating that you are not eligible for the Metro Bus ADA Dial-a-Ride or any restrictions which may have been placed upon your use of the service.

Filing An Appeal:

1. All appeals must be filed in writing within 60 days of receipt of the original determination of ineligibility, conditional eligibility, or denial of a specific trip request. If the 60th day after the original determination or trip denial is on a weekend or legal holiday, an appeal will be accepted on the next subsequent business day.
2. Applicants are urged to state in their appeal letter the reasons why they believe the determination does not accurately reflect their ability to use fixed route Metro Bus service. Written material regarding the specific functional ability of the applicant or relating to the general nature of the individual's disability may be submitted at this time. An applicant may, however, request an appeal hearing without providing additional detail and without the submission of additional written material or information.

Receipt and Scheduling an Appeal Hearing:

1. Upon receipt, all appeals will be date-stamped and referred to the ADA Mobility Specialist for initial review and consideration. The ADA Mobility Specialist may choose to:
 - a. reverse a determination of ineligibility or revise conditions of eligibility;
 - b. authorize a specific trip request which had been denied;
 - c. schedule the matter for a hearing by the Metro Bus Appeal Committee.

Appeal Committee Procedures:

1. Copies of the original application submitted by the applicant, including medical verification, any additional material submitted by the applicant in filing the appeal, and any results from either a cognitive or physical functional assessment, will be provided to the Appeal Committee at least three (3) days in advance of the appeal hearing.
2. The Appeal Committee shall hear and consider:
 - a. the information provided in the original application;
 - b. any additional information, written or verbal, received from the applicant;
 - c. any results from either a cognitive or physical functional assessment;

METRO BUS
the people picker-uppers.

- d. the statements of the applicant, his/her advocate and any other witnesses offered by the applicant; information from Metro Bus staff regarding its services, the architectural or other barriers impacting access to fixed route service or other eligibility criteria; and
 - e. any other material deemed by the Appeal Committee to be germane to the consideration of the applicant's ability to utilize Metro Bus fixed route service.
3. After it has received, reviewed and considered the material presented as part of the Appeal process, the Appeal Committee shall render a decision and shall direct the ADA Mobility Specialist to prepare a letter to the applicant regarding its determinations. The Appeal Committee will specify, and the letter shall explain in detail, the reasons for their decision.
 4. The Appeal Committee will normally render its decision immediately after the hearing. If the Committee determines that it must delay a decision in order to obtain further information regarding the appeal, U.S. Department of Transportation regulations pertaining to presumptive eligibility will apply.

Interim Service:

1. During the period between the receipt of an appeal of an initial determination regarding eligibility and the determination of the Appeal Committee, no ADA Dial-a-Ride Service will be provided to the applicant. This does not apply if the applicant is going through a re-certification process, at which time, they will be able to continue using Dial-a-Ride Service until the Appeal Committee has made a final decision.
2. If an appeal is taken based upon a determination of trip eligibility, service for the trip in question will be provided until an appeal hearing is concluded.
3. If the Appeal Committee has not rendered its decision within thirty (30) days of the hearing, service will be provided on an interim basis pending final determination by the Board.

Privacy of Applicants:

1. All Appeal Committee copies of applicant's applications and supporting materials remain the property of Metro Bus and will be returned to the ADA Mobility Specialist at the conclusion of the appeal hearing.
2. Members of the Appeal Committee are strictly prohibited from discussing the details of an appeal or regarding the name or other identifying characteristics of the applicant with any person not directly involved in the appeal. Members may discuss information of a general sort regarding a particular type of disability and its functional impact upon an individual's ability to use fixed route service in preparation for a hearing, but are advised to take care that information regarding specific applicants is not shared.

If you wish to submit your appeal in writing, you may send it to the following address:

Metro Bus Dial-a-Ride
Attn: ADA Certification Appeal Committee
700 W. St. Germain St, Ste 100
St. Cloud MN 56301

The Metro Bus Appeal Committee meets the third Tuesday of every month beginning at 11:30 a.m. at the Mobility Training Center, 700 W. St. Germain Street, St. Cloud MN