

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

Winston-Salem Transit Authority
Paratransit Compliance Review

Final Report

February 2016

Federal Transit Administration



U.S. Department of Transportation
Federal Transit Administration

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Executive Summary

Objective and Methodology

This report reviews the Winston–Salem Transit Authority’s (WSTA) complementary paratransit service (Trans-AID) in Winston-Salem, North Carolina. Its objective is to verify whether WSTA is meeting its obligations under 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 Paratransit riders and local disability organizations
2. Site visit: a three-person review team’s observation of how WSTA handles Trans-AID trip requests, scheduling and dispatching, examination of eligibility applications and related documents (including appeals), and interviews with contractor employees
3. Analysis and reporting: identification of deficiencies requiring corrective actions and suggestions of effective practices in complementary paratransit service

WSTA representatives are committed to operating high quality paratransit service as a complement to its fixed route service. WSTA’s Trans-AID service includes the following positive program elements:

Positive Program Elements

- WSTA meets or exceeds regulatory requirements related to the Trans-AID service area, days and hours of operation, fares, response time, and trip purposes.
- Trans-AID operates with no trip denials, waiting lists, or trip caps.
- WSTA has a thorough process for tracking and responding to rider complaints about Paratransit service.

WSTA 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

- WSTA’s eligibility determination process incorrectly interprets the presumptive eligibility requirements by allowing for 21 days before scheduling interviews instead of scheduling interviews promptly.
- WSTA’s conditional eligibility determination letters do not include sufficiently specific reasons for the determination.
- WSTA does not have a policy to provide complementary paratransit to visitors not already ADA paratransit eligible from another transit agency.
- WSTA does not promote the availability of eligibility and other materials in accessible formats in its paratransit guide or on its website.

WSTA has the following substantive deficiencies that need to be addressed to bring their program into compliance with 49 CFR Parts 27, 37 and 38:

Substantive Deficiencies

- Trans-AID riders experience a substantial number of significantly untimely pickups.
- WSTA's 40-minute pickup window for Trans-AID service is too long.
- WSTA does not have sufficient telephone capacity to answer calls promptly during all service hours.
- The City of Winston Salem (through WSTA) does not have sufficient requirements in place for monitoring services provided by its contractor in order to ensure compliance with the DOT ADA regulations.

Please see Section 6 for a discussion of all 23 deficiencies. The Summary Table of Compliance Review Findings (following Section 6) lists all findings. WSTA must address all deficiencies within 60 days of receipt of this report.

1 General Information

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

Grant Recipient:	Winston-Salem Transit Authority (part of City of Winston-Salem)
City/State:	Winston-Salem, North Carolina
Grantee Number:	1114
Executive Official:	Art Barnes, General Manager
On-site Liaison:	Takiha Alston, ADA Coordinator
Report Prepared By:	the Collaborative, Inc.
Dates of Site Visit:	August 18–21, 2015
Review Team Members:	David Chia, the Collaborative, Inc. Bill Schwartz, the Collaborative, Inc. Jim Purdy, 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 WSTA

The Winston-Salem Transit Authority (WSTA) provides fixed route bus and paratransit service in the City of Winston-Salem, NC and portions of adjoining Forsyth County. WSTA is part of the City's Department of Transportation. It has an eight-member board of directors, all recommended by the mayor and appointed by the City Council. The City has a contract with Transdev (formerly Veolia) to operate transit services. All WSTA personnel, including the General Manager, are Transdev employees.

WSTA's fixed route fleet consists of 53 buses. In FY 2015 (July 2014–June 2015), WSTA provided 3,248,003 unlinked passenger trips on its fixed route buses. It had an operating budget of \$11.5 million.



For more information on WSTA paratransit services, go to <http://www.wstransit.com/paratransit-service/>

4.1 Introduction to Complementary Paratransit Services and Organizational Structure

WSTA operates Trans-AID, its complementary paratransit service for persons with disabilities who cannot use WSTA fixed route bus service. Trans-AID also serves Medicaid riders and older adults (60 years and older). Trip reservations and eligibility determinations (including in-person interviews) take place at the downtown Clark Campbell Transportation Center, 100 West 5th Street; scheduling, dispatching, vehicle storage, and maintenance occur at the WSTA administrative office, 1060 North Trade Street.

As mentioned above, all WSTA personnel responsible for Trans-AID are Transdev employees.

WSTA has fleet of 35 vans and small buses for Trans-AID service and uses paratransit software for reservations, scheduling, and dispatch operations.

Table 4.1 presents Trans-AID ridership for FY 2012 to FY 2015. In FY 2015, WSTA provided 178,187 Trans-AID trips. Of these, 138,747 (78 percent) were ADA paratransit trips. As shown, both the number and proportion of ADA paratransit to trips Trans-AID trips have increased over the past four years from 58 to 78 percent.

Table 4.1 -- Trans-AID Ridership

Fiscal Year	Trans-AID Trips	ADA Paratransit Trips	Percent Paratransit	Percent Paratransit Growth
FY 2012	145,193	83,747	57.7%	41.6%
FY 2013	153,558	96,238	62.7%	14.9%
FY 2014	160,915	111,822	69.5%	16.2%
FY 2015	178,187	138,747	77.9%	24.1%

In FY 2015, the Trans-AID operating budget was \$2,949,531.

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 WSTA's Trans-AID 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 Trans-AID service area, response time, fares, and hours and days of service, as well as its policies, standards and procedures for monitoring service provision, including on-time performance, on-board travel time, telephone hold times, and avoiding trip denials and missed trips. The review seeks to ascertain whether service is being provided to eligible individuals within at least the minimum required service area on a next-day basis, during the same hours and days as the fixed route system, for not more than twice the fixed route fare for the same trip; whether there are patterns or practices that result in a substantial number of trip limits, trip denials, untimely pickups, and/or trips of excessive length; policies which cause riders to arrive late to appointments; or long telephone hold times, as defined by the transit agency's established standards (or typical practices if standards do not exist).

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

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

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

5.2 Methodology

FTA's Office of Civil Rights sent a notification letter to Art Barnes, WSTA's General Manager, on June 8, 2015, confirming the dates for the site visit and asking WSTA to send information to the review team before the site visit. (See Attachment A.)

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

- WSTA's description of how it structures its complementary paratransit service
- Public information describing WSTA's complementary paratransit service
- WSTA's standards or goals for on-time performance, trip denials, missed trips, complementary paratransit trip length, on-time performance, and telephone hold times
- Public documents that specify these standards, goals and procedures

As requested by FTA, WSTA made additional information available during the visit:

- Copies of completed driver manifests for recent months
- Thirty-six months of service data, including the number of trips requested
- Records of consumer comments and complaints related to capacity issues, including trip denials, on-time performance, travel time, and telephone access
- Procedures for addressing rider complaints and other incident reports
- WSTA's complaint recordkeeping process
- A fleet roster of Trans-AID vehicles
- A listing of complementary paratransit drivers and their start dates
- Operating budgets, capital spending plans, and cost data

The WSTA complementary paratransit service site visit took place from August 18-21, 2015. The visit began with an opening conference, held at 9 a.m. on August 18, 2015, at the WSTA administrative offices at 1060 North Trade Street, Winston-Salem, NC. Attending the conference were:

- Art Barnes, General Manager, WSTA
- Verylen Crawford, Operations Manager, WSTA
- Tikiha Alston, ADA Coordinator, WSTA
- Jackie Settle, Mobility Manager, WSTA
- Roderick Cockerham, Paratransit Director, WSTA
- John Ashford, Maintenance Manager, WSTA
- Toneq' McCullough, Director of Transportation, City of Winston-Salem

- John Day, Program Manager for Policy and Technical Assistance, FTA (via telephone)
- David Chia, Review Team Leader, the Collaborative
- Jim Purdy, Review Team Member, the Collaborative
- Bill Schwartz, Review Team Member, the Collaborative

Following the opening conference, the review team met with WSTA representatives to discuss the information sent in advance, the on-site materials, Trans-AID policies and procedures, and the trip records and data for the on-time performance and travel time analysis.

The review team looked at how Trans-AID complies with DOT service criteria and coordinates transit agencies with adjoining fixed route service areas.

During the afternoon, the review team gathered information on the telephone system. Two members of the review team also observed reservationists taking trip requests at the downtown office. One member of the review team began to discuss the eligibility determination process with the ADA Coordinator.

On Wednesday, August 19th, the review team again observed trip reservations in the morning. A team member met with the ADA Coordinator and Customer Service Manager to discuss WSTA's process for accepting, tracking, and responding to complaints.

One team member reviewed the eligibility determination process, including applicants' files, while other members gathered data to analyze on-time performance and on-board travel times for a sample week (April 15–21, 2015) and month (April 2015). Team members also gathered further information on the telephone system to analyze hold times and interviewed Trans-AID drivers.

On Thursday, August 20, a team member met with the Paratransit Director to discuss scheduling and collect further information about Trans-AID operations, including: fleet data, driver availability, and driver tenure. Team members observed the Trans-AID dispatchers during the midday, which managers said was the busiest time for Trans-AID operations. They also interviewed additional drivers. In the afternoon, team members met with the Director of Transportation for the City of Winston-Salem, gathering information about the city's activities to monitor Trans-AID service. Team members conducted further analysis of on-time performance, trip lengths, and telephone performance.

On Friday, August 21, 2015, the review team continued to analyze and tabulate the various data they had gathered. They prepared for the exit conference, which took place at 11 a.m. at WSTA's administrative offices at 1060 North Trade Street, Winston-Salem. Attending the conference were:

- Art Barnes, General Manager, WSTA
- Verylen Crawford, Operations Manager, WSTA
- Tikiha Alston, ADA Coordinator, WSTA
- Jackie Settle, Mobility Manager, WSTA
- Roderick Cockerham, Paratransit Director, WSTA
- John Ashford, Maintenance Manager, WSTA
- Tomeka Cockerham, Operations Analyst, WSTA
- Toneq' McCullough, Director of Transportation, City of Winston-Salem
- Kenneth Baker, Transit Planner, Winston-Salem Department of Transportation
- John Day, Program Manager for Policy and Technical Assistance, FTA (via telephone)
- David Chia, Review Team Leader, the Collaborative
- Jim Purdy, Review Team Member, the Collaborative
- Bill Schwartz, Review Team Member Manager, the Collaborative

FTA provided WSTA with a draft copy of the report for review and response. A copy of WSTA's response is in Attachment B.

5.3 Stakeholder Interviews

Before the site visit, the review team interviewed eight Trans-AID riders and four healthcare or disability organization representatives on a range of topics, including eligibility determinations and various Trans-AID service issues. Following is a summary of comments received.

Eligibility. A majority of the riders who discussed the initial eligibility process and recertification process were satisfied with the timeliness and the process. Two riders said that WSTA initially would not grant eligibility because they lived more than 3/4-mile from a bus route. One rider said that it took several months to get eligibility.

Telephone access. A majority of the riders and staff noted long wait times to make trip requests. They cited telephone hold times of 10–40 minutes. Two riders reported calling before 5 p.m. and were on hold till after 5 p.m., then were told that it was too late to request a trip. While one rider said that there were some improvements recently, the others did not cite any recent changes. Riders did not cite any particular better day or time to call, although late afternoon appeared to be the busiest time.

Denials. All but one of the riders said Trans-AID schedules all their trips without denials. Two agency staff members cited “wait lists,” though they may have been referring to receiving subscription service.

Trip negotiation. Generally, riders do not have to negotiate either their requested pickup or drop-off times. However, certain riders and staff members cited pickup times that they believed were changed without Trans-AID's notifying them.

On-time performance. Four riders had concerns about on-time pickups; one rider estimated “60 percent late.” Most riders said that drop-offs were generally on time, although some were very early. One rider said that she requested drop-off times 15 minutes early in order to be on time.

Travel times. Five riders cited occasional long trips, sometimes longer than two hours on the vehicle. This usually occurs when there are “group trips,” i.e., many riders from the same origin returning to different destinations.

Drivers. Opinions on driver performance varied greatly. Some riders and agency staff were happy with driver service; one agency staff member complimented the drivers for their sensitivity to the riders. Several riders said that some drivers offered little or no personal assistance to riders. Riders also said that newer drivers tended to rely more on GPS for navigating the service area.

Complaint Resolution. The riders who called or wrote to WSTA to complain about Trans-AID service were not satisfied with WSTA's response. They said that WSTA acknowledged the complaints, but did not inform them of the resolution. Several riders said that the WSTA managers were polite but not helpful.

Other Comments. Respondents also provided the following additional comments:

- One rider said that some vehicles do not have air conditioning or windows that open. She said that a Trans-AID manager told her that there were no other vehicles available.
- One rider noted that Trans-AID did not have a customer service representative who spoke Spanish.

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 WSTA'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.

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.

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

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 WSTA to provide comparable 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, deficiencies were found with the prohibition against unreasonable administrative burdens in WSTA's eligibility process for Trans-AID service.

Applications for ADA paratransit eligibility have five different variations (see below), depending on the specific disability. All applications include a Part A (to be completed by the applicant) and Part B (to be completed by a medical professional). Most applicants also participate in an in-person interview at the Transportation Center. Upon request, WSTA provides Trans-AID service to applicant interviews at no charge.

The applications (all variations) state:

After WSTA has received your application, you will be contacted within *21 business days* by the WSTA ADA Coordinator/staff to schedule an in-person interview and functional assessment to determine your eligibility. [Emphasis added]

The Guide to Riders has slightly different text (page 19):

How long does it take for the application process?

After the ADA Coordinator has received your application; the process begins. You will be contacted and interviewed within *21 days*. The ADA coordinator will schedule an in-person interview and possibly a functional assessment to determine your eligibility. Once the interview and the functional assessment are completed, a determination will be made within 3-5 business days of the actual interview. The determination is made from the in-person interview and the functional assessment. [Emphasis added]

These inconsistently worded policies appear to misconstrue the presumptive eligibility requirements specified in § 37.125(c), which obligate transit agencies to provide presumptive eligibility to an applicant after 21 days if the agency has not made an eligibility determination by the 22nd day. (See below.)

FTA expects transit agencies that require applicants to first submit paper applications and then appear for in-person interviews or functional assessments to offer these appointments promptly (e.g., within 7–10 days) once applications have been received. FTA considers long wait times for interview appointments an unreasonable administrative burden. WSTA’s policies introduce unreasonable delays in application processing times.

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must revise its procedures for eligibility determination to schedule in-person interviews promptly (e.g., 7–10 days) once applications have been received. WSTA must also update its Guide for Riders and website to reflect these changes.

6.3 Paratransit Eligibility Standards

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

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

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

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

Discussion: During this compliance review, deficiencies were found with WSTA’s written policies for allowing PCAs and companions to accompany Trans-AID riders.

No other deficiencies were found with the comprehensiveness and accuracy of WSTA’s eligibility determination process.

Three advisory comments are made concerning information about personal care attendants (PCAs), recordkeeping practices, and eligibility categories tied to riders’ home address.

Written applications for ADA paratransit eligibility vary as follows:

- Physical disabilities
- Cognitive disabilities

- Psychiatric disabilities
- Visual disabilities
- Seizures

Each version of the application has questions tailored to the type of disability. Information about the eligibility determination process and more general questions are similar in all five versions. Attachment C presents the “Trans-AID Eligibility Application for Persons with Physical Disabilities.”

All of the applications include questions about an applicant’s need for a personal care attendant (PCA), the PCA’s name and telephone number if known. Consistent with the § 37.123(e) requirements, the need for a PCA does not impact WSTA’s eligibility determinations. Asking for known PCA contact information is unusual, and serves little purpose given that the individual serving as a PCA may change frequently; however, because this information is not required as part of the application process, no finding has been made.

Applicants complete Part A and medical professionals must complete Part B. When completed and submitted, WSTA reviews the materials for completeness with the most common issue being missing information from Part B.

WSTA’s ADA Coordinator reviews completed applications, and schedules interviews for all first-time applicants. Eligible riders applying for recertification whose abilities are unlikely to change receive approval without follow-up interviews. (See below.) For those requiring interviews, WSTA calls the applicant to schedule an interview and sends a follow-up confirming the appointment time.

The in-person interview and assessment (60–75 minutes) includes a conversation and, if necessary, a walk outside the Transportation Center and across the street, after which the ADA Coordinator makes a determination and prepares a determination letter.

Table 6.1 presents the distribution of eligibility determinations for the 14 months between June 1, 2014 and July 31, 2015, which showed that 89 percent of applicants received some form of Trans-AID eligibility and slightly less than 11 percent were determined not eligible.

**Table 6.1 – Trans-AID ADA Paratransit Eligibility Determinations
June 1, 2014 – July 31, 2015**

Eligibility Category	Jun-Dec 2014	Jan-Jul 2015	14 months
Unconditional	54.5%	83.1%	72.1%
Conditional	10.0%	7.9%	8.7%
Temporary	20.0%	1.1%	8.4%
Not eligible	15.5%	7.9%	10.8%
Total Determinations	110	177	287

To assess WSTA’s eligibility determination process, the review team examined a sample of 19 eligibility determination files. This included ten determinations of unconditional eligibility, three determinations of temporary unconditional eligibility, four conditional eligibility determinations, and two eligibility denials.

A sample of WSTA’s eligibility determinations appeared reasonable. Based on information the applicants and medical professionals provided in writing, along with notes from in-person interviews and assessments, WSTA properly determined those able to use fixed route service not eligible for ADA paratransit service, while those able to use fixed route service for at least some of their trips received conditional eligibility. (See below for a discussion of the determination letters for conditional eligibility.)

Applicants found not eligible have 60 days from the date of the notification letter to appeal the decision. After those 60 days, WSTA discards the files and has no record of the applications. As a result, WSTA could only provide the review team with two sample files for applicants determined not eligible.

WSTA established an “ADA-2” eligibility category for riders determined ADA paratransit eligible who live outside the complementary paratransit service area. Page 2 of the Guide to Riders states:

They are persons with disabilities who qualify under the terms of the Americans with Disabilities Act of 1990; however, they live more than 3/4 of mile away on either side of the Winston-Salem Transit Authority’s (WSTA’s) fixed-route. If a passenger under these criteria is provided transportation and the client is traveling within 3/4 miles of the fixed-route, additional service will be provided. Please be aware, transportation to return the passenger to his/her residence (if outside of the 3/4 mile service area) may not be guaranteed.

The ADA-2 category could mislead ADA paratransit eligible riders whose home address is not a factor in determining eligibility. Policies related to traveling to or from addresses outside of the WSTA service area are applicable to all riders, not just those whose home address is outside of the service area. While offering a written reminder to such riders that their home address is outside of the service area, the use of a second category is not necessary.

Page 9 of the Guide for Riders states “Each Trans-AID passenger is allowed either one Personal Care Attendant (PCA) or companion to accompany them on a trip.” This is inconsistent with Appendix D to § 37.131, which states:

“A personal care attendant (i.e., someone designated or employed specifically to help the eligible individual meet his or her personal needs) always may ride with the eligible individual. If there is a personal care attendant on the trip, the eligible individual may still bring a companion, plus additional companions on a space available basis. The entity may require that, in reserving the trip, the eligible individual reserve the space for the attendant.”

In practice, WSTA allows Trans-AID riders to travel with both a PCA and multiple companions. The review team did not observe Customer Service Representatives (CSRs) limiting trips to PCAs and companions or limiting the number of reservations callers could make during each call.

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must revise its Guide for Riders to make it clear that a Trans-AID rider may always travel with a PCA and one companion; and that a rider may travel with additional companions if space is available.

Advisory Comments: While transit agencies may ask applicants about their use of PCAs when traveling on complementary paratransit service, it is not necessary to collect contact information for PCAs.

For applicants determined ineligible, an effective practice is to retain the applicant files for at least one year after sending the applicant letters of ineligibility. This practice can facilitate appeal reviews and assist with future FTA compliance reviews.

For applicants whose home address is outside the complementary paratransit service area, an effective practice is to inform riders that they are eligible for trips within the service area, but that WSTA cannot guarantee service to or from their home address.

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 how WSTA communicates the availability of all information about the process, materials necessary to apply for eligibility, and notices and determinations concerning eligibility.

No deficiencies were found with the requirement for WSTA to make all information about the process, materials necessary to apply for eligibility, and notices and determinations concerning eligibility available in accessible formats.

WSTA offers Trans-AID eligibility materials in large print and electronically upon request. WSTA can also translate the information into other languages. Each Trans-AID eligibility application states on Page 2:

This application is available in alternative formats. If you would like additional assistance, please call (336) 727-2000. The information in this application will be used only to determine your eligibility for Trans-AID services, and will be kept confidential.

However, WSTA does not promote the availability of information in accessible formats in its Guide for Riders or on its website.

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must promote in its Guide for Riders and on its website the availability of accessible formats that explain the eligibility process, the materials needed to apply, and notices and determinations concerning eligibility. WSTA must let the public know which alternative formats are available, as well as how to request information in an alternative format.

Eligibility Determinations or Presumptive Eligibility Within 21 Days

Requirement: Under 49 CFR § 37.125(c), a transit agency that has not made a written eligibility determination by the 21st day following submission of a complete application must treat the applicant as eligible on the 22nd day and provide service until and unless the transit agency denies the application. Transit agencies that require functional assessments must schedule such assessments within a reasonable period of time (7–10 days). The transit agency's process must communicate to applicants the right to this presumptive eligibility so they are aware of their rights to schedule and use the service beginning on the 22nd day.

Discussion: During this compliance review, deficiencies were found with the requirement for WSTA to communicate applicants' rights to presumptive eligibility for applications not processed within 21 days.

WSTA misinterpreted the requirements in CFR § 37.125(c) to mean it should schedule and conduct in-person interviews within 21 days of receiving written applications. WSTA provides presumptive eligibility if its staff does not schedule and conduct an interview within 21 days instead of doing so when staff cannot make a determination after receiving a completed application within 21 days.

In all versions of its applications for Trans-AID service, WSTA includes information about presumptive eligibility (page 2):

If you have questions or have not been contacted within 21 business days of submitting your application, call the ADA Coordinator... If, at that time a determination of your eligibility has not been made, you will be temporarily eligible for Trans-AID service until such time as your application can be reviewed.

WSTA also has a template for letters granting presumptive eligibility to applicants for whom WSTA has not yet made a determination. However, a team member reviewed a sample of eligibility files and found that WSTA was not consistent in sending this letter to applicants, even based on its incorrect understanding of the requirements.

FTA considers the date of notification as the date WSTA sends its written determination letters. To measure WSTA's processing times, the review team analyzed 19 application files during 2014 or 2015. WSTA processed all but three applications within 21 days.

Among these three applications, one was a determination of not eligible, one was a conditional eligibility determination, and one was for temporary eligibility. In the latter two, WSTA recertified riders, and continued to provide service without interruption. However, for all three of these applicants, WSTA did not document that they had sent letters or otherwise notified them of their presumptive eligibility.

WSTA does not use tools such as spreadsheets or databases to record and measure processing times between the receipt of completed applications and transmittal of determination letters. Until the determination, WSTA keeps application files separate without entering any information into a tracking system (paper or electronic) to record and track key milestones in the application process, such as:

- Date paper application received
- Date paper application reviewed for completeness
- Date(s) WSTA staff contacts applicant to schedule in-person interview
- Date of interview letter
- Date of in-person interview
- Date of determination letter

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must revise its eligibility applications, related correspondence, and other public information, explaining the right to presumptive eligibility. When WSTA has not made an eligibility determination by the 22nd day after receiving a completed application, applicants have the right to receive Trans-AID service beginning on the 22nd day.

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

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

Discussion: During this compliance review, deficiencies were found with WSTA's written eligibility determination with respect to determinations of conditional eligibility and not eligible.

No deficiencies were found with WSTA's letters granting unconditional or temporary eligibility.

The determination letters that WSTA sends to its applicants serve as the official documentation of eligibility required by § 37.125(d). WSTA does not provide Trans-AID riders with a separate ID card. The letters include all required information:

- Name of the eligible individual
- Name of the transit provider
- Telephone number of the entity's paratransit coordinator
- Expiration date for eligibility
- Any conditions or limitations on the individual's eligibility including the use of a personal care attendant (PCA)

WSTA's letters for determinations other than for unconditional eligibility provide information about the appeals process.

WSTA's letters limiting or denying ADA paratransit eligibility do not include sufficiently specific reasons that would enable applicants to appeal the decision. Letters include statements such as:

- "While you have a disability, you can use the fixed route buses."
- "Doctor notes that you are not appropriate for Trans-AID."

As explained in the [Appendix D](#) to § 37.125(e), when denying eligibility, "the reasons must specifically relate the evidence in the matter to the eligibility criteria of this rule and of the entity's process. A mere recital that the applicant can use fixed route transit is not sufficient."

WSTA's letters applying conditions on eligibility are difficult for riders (and potentially WSTA personnel) to interpret, while other conditions are not specifically related to an applicant's inability to use fixed route bus service. Examples include:

- "Locations not served by accessible fixed routes"
- "Bus does not travel within a reasonable distance of your destination"
- "You have medical appointments"

Other conditions cited in WSTA's letters are more specific and useful, such as:

- Your destination is 2 blocks or more from the nearest bus stop
- Locations where your standing time at a bus stop is more than 10 minutes
- Negotiating hills/steep terrain
- Traveling in environmental settings that would present unsafe and risky conditions, such as heavy rainfall, extreme cold, heat, ice, and/or snow

At present, WSTA does not apply conditions during trip reservations and conditionally eligible riders reserve the same trips as other riders. In order to apply conditions to trip requests, WSTA will need to clearly specify such conditions so both riders and WSTA personnel clearly understand them.

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must:

- Revise letters denying eligibility to include specific reasons for the decision so that riders can prepare appeals.
- Revise its eligibility letters granting conditional eligibility to include specific reasons for the decision that are related to the applicants' inability to use the fixed route buses.

Recertification of Eligibility at Reasonable Intervals

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

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

All applicants certified as ADA eligible may ride Trans-AID for three years. They complete the same application form and follow the same process as individuals who are applying for the first time. WSTA is considering lengthening the term of eligibility to five years for certain individuals that it judges to have "permanent" disabilities.

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 how WSTA administers its appeals of ADA paratransit eligibility with respect to its eligibility appeals form, separation of function, timelines for hearing appeals and making decisions, or with providing appeal decisions in writing.

All versions of the written Trans-AID application include the following statements (page 2):

If you are denied Trans-AID eligibility, you will receive a letter regarding this decision and a copy of the Trans-AID Appeals Process. You have the right to appeal. For more information, contact the WSTA/ ADA Coordinator...

In addition, all determination letters other than unconditional eligibility determinations include the following statements:

If you do not agree with the decision that has been made, you have the right to appeal this determination. For your convenience, I have enclosed a copy of the Appeal process. Any request to appeal a denial of eligibility must be received within 60 days of the receipt of the denial of eligibility letter.

The Guide to Riders describes WSTA’s process for appealing an eligibility determination decision (page 15). WSTA asks appellants to submit requests in writing, and invites appellants to state the reason for their appeal. The Guide states, “a passenger may, however, request an appeal hearing without providing additional detail and without the submission of additional written material or information.”

Before scheduling an appeals hearing, the ADA Coordinator and Mobility Manager review their determinations of “not eligible,” and may revise their decisions before the formal hearing.

Between three and five members comprise the appeals panel. According to the ADA Coordinator, at least two panel members have knowledge of disability issues; one panel member is a manager from the neighboring High Point Transit System.

Other elements of the appeals process include:

- Requirement to submit an appeal within 60 days
- Hearing procedures
- Instructions on presenting additional information
- Scheduling of appeals hearing (10 business days)
- Timeline for appeal decisions (5 days)

WSTA uses the same appeals process for eligibility determinations as it does for no-show suspensions.

WSTA had no eligibility appeals in 2014 or 2015, as of the time of the site visit.

Complementary Paratransit for Visitors

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

Discussion: During this compliance review, deficiencies were found with regard to eligibility for visitors who do not have eligibility in another system. No deficiencies were found with regard to granting eligibility to those visitors who are ADA paratransit eligible in other jurisdictions.

WSTA does not have a policy to provide complementary paratransit to visitors without documentation from another transit agency. The ADA Coordinator hasn’t received requests from visitors without documentation. Nevertheless, transit agencies need to be prepared for this possibility and make information available to visitors.

After receiving a request from an individual with eligibility from another transit agency, WSTA contacts the agency directly to obtain documentation of eligibility. WSTA provides up to 21 days of visitor eligibility within a 365-day period. WSTA does not publicize its visitor policy either on its website or in its Guide for Riders, which could make it difficult for visiting riders to obtain eligibility.

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must revise its visitor eligibility policy to accept applications from visitors not eligible elsewhere. WSTA can require proof of residence for those whose disabilities are apparent. For visitors whose disability is not apparent, WSTA may require documentation of disability.

6.4 Types of Service

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

Discussion: During this compliance review, no deficiencies were found with the requirement to provide origin-to-destination service to ADA paratransit eligible riders.

WSTA’s Guide to Riders (pages 1-2) states:

Trans-AID is a ride-sharing program that provides special advance-scheduled curb-to-curb, or if needed, door-to-door transportation services to eligible elderly or disabled citizens who reside in Winston-Salem/Forsyth County...

If needed, operators can provide assistance to an individual with a disability to and from the point of origin. Operators cannot provide “personal services” that exceed “door to door” service (e.g., go beyond the doorway into a building....)

With door-to-door service, operators will be required to go to the door of the residence/origin to alert the passenger of their arrival. The operators can go to the door and knock/ring the doorbell if the passenger is not waiting for the van. The door-to-door policy does not allow the vehicle operator to go into the dwelling.

WSTA’s Trans-AID operators will not be able to provide door-to-door service if the door to the passenger’s home or door of the point of origin is not in sight of the Trans-AID vehicle. If it is determined the operator will lose sight of the van or if it is considered a safety hazard, the passenger must have someone assist them to the most accessible point of origin, and the operator will provide assistance from that point.

In July 2015, WSTA published a guidance document on Reasonable Modification of Policy based on Part 37 Appendix E. During interviews with the review team, Trans-AID drivers indicated that they understood their responsibility to offer assistance to riders who needed help beyond the curb.

6.5 Service Criteria for Complementary Paratransit

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

The review team assessed WSTA’s complementary paratransit system using these criteria as described in this section.

Service Area

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

Discussion: During this compliance review, no deficiencies were found with the requirement to provide complementary paratransit service within 3/4 mile of the fixed route bus service area.

WSTA provides service within a 3/4-mile radius of its fixed route bus service. WSTA’s paratransit software uses polygons to determine if requested trips are within that radius, as the service area changes by day of week and time of day as fixed route services change.

Response Time

Requirement: Under 49 CFR § 37.131(b), transit agencies must schedule and provide complementary paratransit service to any ADA paratransit eligible person at any requested time on a particular day in response to a request for service made the previous day, including during times comparable to normal business hours on a day when the offices are not open before a service day. Reservations may be taken by

reservation agents or by mechanical means. Under 49 CFR § 37.131(b)(2), while transit agencies may negotiate the pickup time with a caller prior to a trip being scheduled, they cannot require a rider to schedule trips to begin more than one hour before or after the rider's desired departure time. Any greater deviation would exceed the bounds of comparability. Negotiations should take into account riders' practical constraints. Transit agencies must have policies and procedures in place to ensure that schedulers and dispatchers do not adjust a rider's negotiated pickup time or pickup window without the rider's consent.

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

Discussion: During this compliance review, no deficiencies were found with the requirement to accept reservations during normal business hours for trips on the next service day. WSTA accepts reservations from 8 a.m. to 5 p.m. seven days per week, and takes next-day only reservations on Saturdays and Sundays.

No deficiencies were found with the trip negotiation process during reservations calls. An advisory comment is made regarding paratransit software to schedule trips and spread demand evenly.

Team members observed calls for over 75 trips during four 2-hour sessions, in which customer service representatives (CSRs) accepted all trip requests for ADA paratransit eligible riders, typically by asking callers, "What time do you need to arrive?" and then backing up one hour from that arrival time to enter the trip into the paratransit software. For return trips, CSRs entered the pickup time the caller requested. While entering trips without any negotiation represents good customer service, the regulations permit a transit agency to negotiate pickup times with the rider as long as it does not require the rider to schedule a trip more than one hour before or after the rider's desired departure time. Because WSTA uses paratransit software that can automatically propose pickup times for trips with appointment times, and because the software is designed to balance vehicle loads, not employing such methods can lead to scheduling issues. (See further discussion in "No Substantial Numbers of Significantly Untimely Pickups for Initial or Return Trips," Section 6.6.)

To address concerns raised during stakeholder interviews that Trans-AID was changing certain negotiated pickup times without notifying riders, the review team interviewed WSTA's Paratransit Director and others to discuss Trans-AID trip scheduling. At the time of the site visit, schedulers were not adjusting pickup times. In fact, as discussed in Section 6.6, WSTA often leaves as many as 100 Trans-AID trips unassigned to runs heading into the day's service; were schedulers adjusting pickup times, there would likely be many fewer unassigned trips.

Advisory Comment: For transit agencies that use scheduling software for complementary paratransit service, an effective practice is to use the software during the trip reservations process to offer trip times that correspond to availability, thus reducing the demand during peak hours, as well as the number of unscheduled trips.

Fares

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

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

The fixed route fare for WSTA buses is \$1.00 and the Trans-AID fare is 50 cents. ADA paratransit eligible riders who are Medicaid eligible ride Trans-AID free. PCAs also ride free. Companion fares are the same as Trans-AID fares.

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. Reservationists do not ask ADA paratransit eligible riders the purpose of their trip and no prioritization takes place. Riders wishing to make reservations for non-ADA Trans-AID trips (Medicare or elderly) receive trips based on availability. When non-ADA trips are not available, WSTA adds their names to a waiting list.

Hours and Days of Service

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

Discussion: During this compliance review, no deficiencies were found with the requirement. WSTA operates Trans-AID during the same days and hours as the fixed route service. The paratransit scheduling software includes different schedules according to the days and hours of the fixed route service.

6.6 Absence of Capacity Constraints

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

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

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

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

WSTA does not restrict the number of trips that a Trans-AID rider may take. During observations of CSRs, review team members saw no limit on the number of trips that a caller could request.

No Waiting List for Access to the Service

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

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

WSTA's pre-visit review materials included the statement: "WSTA does not deny trips for ADA paratransit passengers."

When capacity is limited, WSTA places other (non-ADA) Trans-AID riders on a wait list. During observations of trip requests, CSRs did not place any ADA paratransit eligible riders 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, deficiencies were found with WSTA's pickup window and on-time pickup performance, both of which contribute to substantial numbers of significantly untimely pickups.

WSTA's pickup window is 40 minutes (-20/+20). FTA considers pickup windows longer than 30 minutes in total to be excessive, because they require riders to wait an unreasonably long time for service.

WSTA's pre-visit material indicated an on-time performance goal is 90 percent. WSTA obtains monthly reports from its paratransit software, which the review team analyzed. The report for the month of April 2015 indicated 83.4 percent of the trips performed that month were within the 40-minute window, which is below WSTA's goal.

As of the time of the site visit, the City of Winston-Salem was not monitoring on-time pickup performance. (See Section 6.12 for a discussion of deficiencies with respect to monitoring service that private entities provide under contract.)

WSTA had previously equipped Trans-AID vehicles with mobile data terminals (MDTs), but the MDTs were removed due to equipment failure issues. They have identified the need to procure new MDTs, currently budgeted for 2016. Because of the absence of MDTs, WSTA has required its drivers to use paper manifests to record trip data. The manifests include fields for the following entries:

- Arrival time at the pickup address
- Departure time at the pickup address
- Drop-off arrival time
- Departure time from the drop-off address
- Odometer readings at both locations

To track on-time performance, WSTA relies on drivers to call the dispatchers, who record the times into the database. Based on interviews with Trans-AID operations personnel, drivers do not regularly report this information and do not always report the actual times, but instead call the dispatchers after they depart the pickup or drop-off address. It appeared to the review team that the paratransit software is

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.

interpolating pickup and drop-off times. Therefore, the monthly on-time performance reports are not reliable.

The review team obtained detailed trip data from the paratransit software for a seven-day period between April 15 and April 21, 2015. The team's analysis of pickup performance is based on the software data and paper manifests from a sample of 123 recorded trips during the April sample week. The results are presented in Table 6.2. As shown, 78 percent of the sample trips were within the -20/+20 window, below WSTA's on-time goal of 90 percent and also below the April monthly reported rate. This represents a capacity constraint.

Table 6.2 – On-Time Performance for Sample of Trans-AID Trips: April 15–21, 2015

	Number	Percent
Sample Size		123
Early	6	4.9%
In window (-20/+20)	96	78.0%
Early or in Window		82.9%
All late	21	17.1%
1–15 minutes late	15	12.2%
16–30 minutes late	4	3.3%
>30 minutes late	2	1.6%

Furthermore, if WSTA used a 30-minute pickup window rather than 40 minutes with the same resources and demand the on-time performance would fall lower.

The review team interviewed dispatchers, schedulers, and other operations personnel who acknowledged different reasons for Trans-AID's poor on-time performance. The number of available vehicles is one key factor. The Trans-AID fleet is 33 vehicles; WSTA stated that they typically need 25 vehicles each day. However, on August 20th, WSTA only had 20 vehicles available.

WSTA's Trans-AID fleet is old. Three of the 33 vehicles are less than five years old (19 vehicles began service in spring or summer 2010; another 11 vehicles began service in 2007 or earlier). Median mileage as of October 2015 was 225,100 miles and eight vehicles had fewer than 200,000 miles. While WSTA plans to obtain replacement vehicles in the coming years, the age of the current fleet is a constraint.

Second, as mentioned in Section 6.5 under Response Time, WSTA does not negotiate pickup times with riders during reservations calls. The DOT regulations allow transit agencies to negotiate the pickup time up to one hour (subject to practical constraints of the rider) before or after the initially requested time. These negotiations allow an agency to "smooth" demand and reduce the peak ridership, lowering requirements for peak vehicles and drivers. Such an approach is particularly useful during hours when subscription trips are higher. (See Section 6.7.)

WSTA's paratransit software (as well as all other major paratransit software) has the capability to offer alternate pickup times within the allowed negotiating window. To use this feature, WSTA would likely need to train CSRs as well as orient riders.

One main consequence of accepting trip requests without negotiations is that Trans-AID schedulers are left with a significant number of trips they have to assign to vehicle runs. According to WSTA's Paratransit Director, WSTA provides approximately 700 of the 900 weekday trips typically scheduled, (accounting for late cancellations, no-shows, and missed trips). Each weekday morning, as many as 100 trips remain unassigned to a run.

Paratransit operations typically provide *some* unscheduled trips at the start of a weekday. But up to 100 unscheduled trips divert dispatchers' attention away from tracking vehicles on the road and maintaining

on-time service. Thus, the combination of an aging, less reliable fleet and a high number of unassigned trips are likely significant contributors to WSTA's poor on-time performance.

Corrective Actions and Schedule: Within 60 days of receiving the final report, WSTA must modify its pickup window to be no longer than 30 minutes. WSTA must also develop a plan to improve its on-time performance for pickups and related tracking methods to reduce the substantial number of untimely trips.

No Substantial Numbers of Trip Denials or Missed Trips

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

Discussion: During this compliance review, a deficiency was found regarding the tracking of missed trips. No deficiencies were found with the number of trip denials.

WSTA policy is to "not deny trips for ADA paratransit passengers." The review team observed that CSRs do accept all trip requests from ADA-certified riders and had no reports indicating past denials.

At the time of the site visit, WSTA was not receiving valid missed trip reports from its contractor. (See Section 6.12 for a discussion of deficiencies on monitoring service that private entities provide under contract.) Nevertheless, based on interviews and observations of drivers and dispatchers, WSTA's understanding of missed trips is consistent with FTA's, which occur when:

- The vehicle arrives and leaves before the beginning of the pickup window without picking up the rider.
- The vehicle arrives and leaves without picking up the rider and does not wait at least five minutes within the pickup window.
- The vehicle arrives after the end of the pickup window and departs without picking up the rider.

Many driver manifests do not include arrival and departure times for pickups (or attempted pickups). As a result, no data exists to determine if drivers arrive before or within the pickup window and wait at least five minutes within the pickup window.

If riders challenge no-show charges, WSTA supervisors review the video from the vehicle's camera to determine if drivers arrived at the correct pickup address, before or within the pickup window, and waited at least five minutes. If riders do not challenge a no-show, WSTA assumes that it has made a correct determination.

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must collect the necessary data to determine whether drivers arrive at pickup locations in a timely manner and, if the rider is not present, wait a sufficient length of time before departing. After collecting this data, WSTA must use this information to distinguish between rider no-shows and Trans-AID missed trips.

No Substantial Numbers of Trips With Excessive Trip Lengths

Requirement: Under 49 CFR § 37.131(f)(3)(i)(c), transit agencies must provide complementary paratransit service without substantial numbers of trips with excessive trip lengths. Comparability is

based on the length of time required to make a similar trip between the same two points using the fixed route system, including time spent traveling to and from a boarding point and waiting for the fixed route vehicle to arrive. FTA recommends basing complementary paratransit travel time on the comparable fixed route travel time, plus 20–30 minutes to allow for a reasonable estimate of time spent walking to and from a bus stop, waiting for the bus to arrive, and making any necessary transfers from one vehicle to another.

Discussion: During this compliance review, deficiencies were found with patterns of trip lengths exceeding acceptable times for certain Trans-AID riders.

No deficiencies were found with the requirement that complementary paratransit service be provided without substantial numbers of trips with excessive trip lengths, with WSTA’s standards for defining when trips are comparable with fixed route travel time, and when trip lengths are excessive.

WSTA provides complementary paratransit service without a substantial number of excessively long trips. However, for select individuals, a pattern of regular trips exceeded fixed route times by substantial margins. These riders tend to have subscription service (“standard trips”), and WSTA assigns many pickups and drop-offs on these runs, leading to excessive travel times, particularly for riders boarding early and/or alighting at the end of runs (“first on, last off”).

The City of Winston-Salem did not monitor travel times at the time of the site visit. (See Section 6.12 for a discussion of deficiencies on monitoring service private entities provide under contract.)

The pre-visit material from WSTA included the following standard for trip length:

The Winston-Salem Transit Authority’s on-board maximum travel time is one (1) hour. The goal for percentage of trips to be provided within the standards for travel time is 90%.

The review team analyzed all trips (both ADA and non-ADA) for the month of April 2015. WSTA’s performance was slightly below its standard. As shown in Table 6.3, 89.7 percent of trips were 60 minutes or less. Over half of trips (53.8 percent) were 30 minutes or shorter, and an additional 22.6 percent were 31–45 minutes long.

Table 6.3 – Trans-AID Trip Length Distribution for April 2015

Trip time (minutes)	Number	Percent
30 or less	8,514	53.8%
31-45	3,576	22.6%
46-60	2,116	13.4%
61–90	1,391	8.8%
91–120	202	1.3%
> 120	41	0.3%
Total	15,840	100%
All Trips ≤60	14,206	89.7

The analysis identified six Trans-AID riders whose trips consistently exceeded WSTA’s standard. Trips included destinations to Goodwill Industries, the Creating Opportunity Center, and a dialysis center. Each of the seven riders took between 13 and 23 trips during the sample month. The lengths of individual trips varied from 61 minutes to more than 2-1/2 hours.

The analysis of these trips found the following:

- For three riders, nearly all Trans-AID trips (78 out of 79 trips) were within 20 minutes of the time of comparable fixed route trips.

- For two other riders, 31 out of 32 Trans-AID travel times exceeded the comparable fixed route travel times by more than 20 minutes; 23 out of 32 Trans-AID trips were at least 30 minutes longer.
- For one rider, four out of his 13 Trans-AID travel times were more than 20 minutes longer than comparable fixed route trips.

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must develop a plan to ensure that particular riders do not experience trips of excessive length (based on a comparison with fixed route service) on a regular basis.

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

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

Discussion: During this compliance review, deficiencies were found with WSTA’s long telephone hold times.

WSTA’s standards for telephone hold times and abandoned calls are:

“Telephone call-handling performance standards for reservations are 100%.”

“WSTA’s standards for hold times are 5–8 minutes and abandoned calls standards range from 4 to 5%.”

Based on discussions with WSTA’s Mobility Manager (who oversees the WSTA call center), the telephone analysis software calculates average hold times for a specified time interval—but it does not calculate the number of calls whose hold times exceed a specific length (e.g., number of calls on hold greater than 3 minutes). This means that WSTA cannot determine whether it is meeting its telephone standards.

The City of Winston-Salem does not monitor telephone performance, including hold times. (See Section 6.12 for a discussion of deficiencies on monitoring service that private entities provide under contract.)

All CSRs answer calls for both Trans-AID and fixed route questions (the most common fixed route inquiries related to trip planning and next-bus information). On weekdays, five CSRs work 8 a.m. to 5 p.m., with staggered lunch breaks. On Saturdays, three CSRs, work staggered shifts from 8 a.m. to 5 p.m., with either one or two at a time. On Sundays, two CSRs, work staggered shifts from 8 a.m. to 5 p.m., although only one at a time, other than a 30-minute shift overlap. After 5 p.m., calls automatically forwarded to the agents in the Transportation Center who answer questions from in-person riders.

In August 2015, WSTA hired additional CSRs to staff weekends and weekdays.

The review team examined telephone statistics for the WSTA customer service call center for the April sample week by hour and day of the week. On weekdays, the average time calls remained in the queue ranged from three minutes on Friday April 17th to five minutes and 36 seconds on Wednesday April 15. As these values represent average wait times, many callers waited much longer. The percentage of abandoned calls went from 16.7 percent on Friday to 38.4 percent on Wednesday.

As presented in Table 6.4, there were 15 hours during the sample week when the average wait time exceeded 5 minutes. On weekdays, there is a regular pattern of long wait times from noon to 4 p.m.

Table 6.4 – Hours during Sample Week with Telephone Queue Times Greater than 5 Minutes

Day	Hour	Average Time in Phone Queue
Sunday	1 p.m.	7:08
Sunday	2 p.m.	10:22
Sunday	4 p.m.	5:57
Monday	12 noon.	6:50
Monday	1 p.m.	6:16
Monday	2 p.m.	6:02
Tuesday	1 p.m.	7:50
Tuesday	2 p.m.	7:03
Wednesday	1 p.m.	5:56
Wednesday	2 p.m.	7:56
Wednesday	3 p.m.	8:51
Wednesday	4 p.m.	9:30
Thursday	12 noon	5:10
Thursday	4 p.m.	5:01
Friday	4 p.m.	6:56

Performance on Sunday April 12 was worse than on weekdays, and performance on Saturday April 18 was better; call volumes on the weekend days were substantially lower than during the weekdays, but staffing was also lower.

As presented in Table 6.5, monthly statistics by hour of day showed similarly poor performance for each month from January through June 2015, indicating that the sample week data was typical of overall telephone system performance.

Table 6.5 – Average Telephone Hold Times and Call Abandon Rates for WSTA Call Center (2015)

Month	Average Hold Time (min:sec)	Abandon Call Rate
January	5:11	31.7%
February	4:19	30.4%
March	3:24	20.6%
April	4:00	25.6%
May	3:24	21.2%
June	3:47	22.9%

Poor telephone performance is likely due to an insufficient number of CSRs staffing the telephones in the call center. A secondary issue is that the CSRs also handle fixed route information calls. However, the review team concluded from its observations that the poor performance in handling Trans-AID calls would still exist even if fixed route service calls were not the responsibility of the CSRs.

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must develop a plan to provide sufficient capacity to promptly answer telephone calls during all service hours. To comply with the 49 CFR § 37.131(f) requirements, WSTA must collect and carefully analyze hourly telephone performance data to determine when it is not meeting its standards. WSTA must increase the number of reservationists and other required resources during hours when performance falls below its standards.

In addition, WSTA should consider revising its telephone standard to establish thresholds for the proportion of calls answered for intervals greater than two minutes, e.g., “At least X percent answered within three minutes, at least Y percent answered within five minutes.” In addition, the standard should state the proportion of hourly periods that WSTA should meet or exceed these service levels.

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

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

Discussion: During this compliance review, deficiencies were found with WSTA's drop-off performance. As discussed in Section 6.5 under Response Time, WSTA CSRs ask callers what time they need to arrive but do not use the paratransit software to then generate solutions (i.e., available runs with associated trip times within the permitted regulatory parameters), which they might then offer to riders.

While WSTA produces monitoring reports for drop-off performance, the City of Winston-Salem is not monitoring drop-offs. (See Section 6.12 for a discussion of deficiencies on monitoring service that private entities provide under contract.)

WSTA's pre-visit material indicated a 90 percent drop-off standard for vehicles arriving before the appointment time. While WSTA does not have any standards related to very early drop-offs, CSRs the review team interviewed stated they try to make sure they don't deliver riders more than 45 minutes early. In the same April 2015 sample of 123 trips, Table 6.6 shows that 86 of the trips (70 percent) had appointment times. Of these, 23.3 percent were late while 76.7 percent of trips occurred before the appointment times. Of the early trips, less than 10 percent were 60 minutes early.

**Table 6.6 – On-Time Drop-Off Performance for Trans-AID Trips with Appointment Times
April 15–21, 2015**

	Number	Percent
Sample Size	86	100%
> 30 minutes late	5	5.8%
16–30 minutes late	7	8.1%
1–15 minutes late	8	9.3%
All late	20	23.3%
0–15 minutes early	21	24.4%
16–30 minutes early	14	16.3%
> 30 minutes early	31	36.0%

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must develop a plan to reduce the high proportion of late drop-offs.

6.7 Subscription Service

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

Discussion: During this compliance review, deficiencies were found with this requirement.

As discussed earlier in this section, Trans-AID service has capacity constraints and has service hours in which subscription trips exceed 50 percent of all trips. Table 6.7 shows that in five hours, 53–73 percent of trips were subscription service.

Table 6.7 – Service Hours When a Subscription Trips Comprise Majority of Trans-AID Trips

Hour Beginning	Total Trips	Subscription Trips	Percent
5 a.m.	624	457	73.2%
6 a.m.	1344	801	59.6%
7 a.m.	1918	1011	52.7%
3 p.m.	1806	1061	58.7%
4 p.m.	1898	1127	59.4%

Note: based on analysis of July 2015 Trans-AID service

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must compare its distribution of subscription trips by time of day with periods of capacity constraints, and develop a plan to limit subscription service to 50 percent of all Trans-AID trips. This can be done by reducing the number of subscription trips or by increasing capacity in these hours.

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

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

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

Discussion: During this compliance review, deficiencies were found with WSTA’s policies triggering service suspensions for rider no-shows. Deficiencies were found with the burden that WSTA places on riders to challenge no-shows.

In the Guide to Riders (page 13), WSTA defines a rider no-show if a rider:

- Places a request for service, but does not take the ride upon its arrival if the pickup is on time
- Cancels a trip less than one (1) hour and 30 minutes before the scheduled pickup time
- Is not ready to board within 5 minutes after the arrival of the vehicle. If the vehicle arrives early, the rider does not have to board until 5 minutes after the actual scheduled pickup time [beginning of pickup window]

For riders that are no-shows for initial trips, WSTA appropriately does not cancel the return trip unless the rider requests the cancellation.

If riders have five or more no-shows within a 30-day period within a calendar quarter, WSTA sends them a warning letter. If the same riders have five or more no-shows during another 30-day period within the same calendar quarter, WSTA suspends them for a two-week period. They continue to suspend riders for

no-shows for two weeks for each incursion thereafter. The tally of no-shows does not carry over from one calendar quarter to the next quarter.

When the rider receives either the initial warning letter or a suspension notification letter, WSTA allows the rider five days to contact WSTA to dispute any no-show. According to the Guide to Riders, WSTA staff investigates the particular incident and makes a determination within five business days. According to WSTA's ADA Coordinator, Trans-AID staff investigates by reviewing on-board video, telephone recordings, or the interactive voice response system (used for after-hour calls).

Once no-shows lead to proposed suspensions, WSTA lets riders appeal by writing a letter to WSTA's Mobility Management office. The Appeals Committee allows the rider to present evidence and within five days of the hearing, makes a decision.

In 2014, WSTA suspended riders 22 times for excessive no-shows. In 2015 (through August), WSTA suspended riders 12 times.

Several components of WSTA's suspension and appeals policy are not compliant.

FTA requires that transit agencies consider riders' trip frequencies when establishing a threshold for excessive no-shows and cancellations. WSTA's policy incorrectly considers a fixed number of violations rather than the rate of no-shows/late cancellations as a proportion of all trips riders take.

In addition, WSTA does not state that it excuses no-shows or late cancellations beyond a rider's control.

Furthermore, as discussed earlier in Section 6.6, WSTA lacks accurate data on most arrival and departure times for pickups (or attempted pickups); its paratransit software estimates these times based on the small amount of actual time data that Trans-AID dispatchers enter into the system, which is not reliable. And since the aforementioned no-show verification process is very labor-intensive, WSTA only does this when riders challenge no-shows. WSTA has no regular process for verifying no-shows prior to communicating them with riders.

Corrective Action Schedule: WSTA must immediately cease all suspensions under its existing no-show policy and reinstate service to those under suspension. Within 60 days of the issuance of the final report, WSTA must:

- Revise its no-show suspension policy to incorporate frequency of scheduled trips that result in no-shows or late cancellations
- Ensure that it excuses no-shows or late cancellations that are beyond a rider's control
- Collect and analyze pickup data that ensures that its tally of no-shows is reliable.

6.9 Complaint Resolution and Compliance Information

Requirements: Under 49 CFR § 27.13(b), transit agencies must have administrative procedures in place that incorporate appropriate due process standards and provide for the prompt and equitable resolution of complaints.

Under 49 CFR § 27.13(a), the transit agencies must designate at least one person to coordinate its efforts to comply with the Part 27 nondiscrimination requirements.

Under 49 CFR § 27.13(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, including the name, address, telephone number, and email address of the aforementioned coordinator. Public advertising includes the agency's website. The complaint procedures must be accessible to and usable by individuals with disabilities. Finally, transit agencies 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), transit agencies must keep all complaints of noncompliance on file for one year and a record of all such complaints (which may be in summary form) for five years.

Discussion: During this compliance review, no deficiencies were found with certain elements of WSTA's complaint resolution and compliance information while two deficiencies were found regarding the required contact information for filing complaints and making the process accessible.

WSTA's ADA Coordinator is designated to coordinate complaint resolution and compliance.

WSTA responds to ADA-related complaints with appropriate due process standards and resolves them promptly via a variety of means. WSTA's website has Contact Us page with a link to a customer experience [page](#), which states:

Any person who believes they have received inadequate customer service may file a complaint with the Winston Salem Transit Authority (WSTA). A complaint must be filed no later than 5 business days after the date of the incident. You may file your complaints at the Clark Campbell Transportation Center, by phone with a Customer Service Representative (CSR) at 336.727.2000, or via WSTA's website under Customer Experience.

Various WSTA employees enter information into their complaint tracking system and complaints are assigned depending on the functional area. The system in use at the time of the site visit did not provide an opportunity to classify complaints as ADA-related.

WSTA assigns complaints to responsible employees (customer service, maintenance, fixed route, Trans-AID, or transportation center) who have five days to respond. They listen to telephone recordings and view videos from on-board cameras. After the investigation is complete, they respond directly to complainants, including sending out letters to retract incorrect or unverifiable no-show charges. (See Section 6.8.)

WSTA's complaint contact information is incomplete. While the name of the ADA Coordinator is listed on the WSTA website and Rider Guide, WSTA doesn't provide the required information in a central location and with all of the required elements. The ADA Coordinator's email address is listed on the Contact Us [page](#) under the staff directory. But the mailing address and telephone number is not provided on that page or on the Customer Experience page.

Page 18 of WSTA's rider's guide describes the complaint process and offers a different email address (custserv@wstransit.com), a telephone number for customer service, but no mailing address. Furthermore, this page does not list the ADA Coordinator's title (or name, which is optional), email address, telephone number, or mailing address.

WSTA's complaint process is not fully accessible. The availability of accessible formats or other accessible services is not published in the Guide to Riders or on the WSTA website.

WSTA database includes detailed records going back more than four years. At the time of the site visit, WSTA was developing a more robust complaint tracking system to separate ADA complaints for improved tracking purposes.

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must:

- Update its public information materials (Guide to Riders and website) to provide consistent and complete contact information for ADA-related complaints
- Make its complaint procedures accessible to individuals with disabilities

6.10 Nondiscrimination

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

Discussion: During this compliance review, a deficiency was found related to inconsistent suspension policies for violent or disruptive behavior between WSTA fixed route and Trans-AID service.

The Guide to Riders (page 16) presents potential suspension periods for “violent and/or threatening behavior by a passenger”:

- First occurrence - 7 days
- Second occurrence – 30 days
- Third occurrence – permanent removal

WSTA fixed route riders face the same sanctions for violent and/or threatening behavior as Trans-AID riders. However, a fixed route rider who receives permanent suspension may appeal this suspension after one year. WSTA does not have an equivalent policy for Trans-AID riders who receive permanent suspensions.

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must revise its policies for violent or disruptive behavior so that the penalties imposed on a Trans-AID rider are equivalent to the penalties imposed on a rider of WSTA fixed route service. WSTA must also revise the Trans-AID Guide for Riders to reflect any change in suspension policy.

6.11 Training Requirements

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

Discussion: During this compliance review, no deficiencies were found with the requirement to train personnel to proficiency. An advisory comment is made regarding using the full capabilities of paratransit software tools.

New Trans-AID drivers undergo comprehensive training in road skills and in passenger assistance and sensitivity. The drivers also receive periodic refresher training. In review team interviews with six Trans-AID drivers, the drivers said that they believed that the training prepared them for their job responsibilities. During the interviews, the drivers also appeared to understand the key Trans-AID policies (e.g., pickup window, waiting time at a pickup address, level of assistance to provide to riders).

In the review team’s telephone interviews with individuals who ride Trans-AID paratransit service or who work with Trans-AID riders, opinions on driver performance varied greatly. Some riders and agency staff were happy with driver service; one agency staff member complimented drivers for their sensitivity to riders. Several riders said that some drivers offered little or no personal assistance to riders.

The review team also observed CSRs and Trans-AID dispatchers and interviewed the paratransit director about the scheduling process. All appeared to understand their job responsibilities and carry them out

properly. However, as discussed in Section 6.5 under Response Time, and in 6.6 under Untimely Pickups, WSTA may need to train its staff more on its paratransit software.

Advisory Comment: When using paratransit software for reservations, scheduling, and dispatching, an effective practice is to fully take advantage of the software tool's capabilities.

6.12 Service Under Contract with a Private Entity

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

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

Discussion: During this compliance review, deficiencies were found with how WSTA monitors its service provider:

- WSTA (the City of Winston-Salem) does not have written objectives to evaluate the performance of Transdev, its contractor for Trans-AID service.
- WSTA (the City) does not actively monitor Transdev or key Trans-AID service quality performance measures.

As discussed in Section 4, WSTA is part of the City's Department of Transportation. WSTA also has a board of directors, which must seek City Council approval for major policy decisions and large expenditures.

The City has a five-year contract with Transdev, which began in August 2010, to operate transit services and hire employees, including the General Manager. Payments to Transdev are fixed each year (with 12 monthly payments). The City's Director of Transportation is responsible for monitoring fixed route and Trans-AID service.

One of the paragraphs within the "Transit Management Agreement" between the City ("the Authority") and Transdev ("the Company") discusses the City's oversight activities:

17. Company's Performance and Evaluation.

The performance objectives to be used in the evaluations of the Company shall be agreed to annually by the Company and the Authority. The Company will report monthly on how it is meeting its objectives. The Authority will audit the accuracy of the information provided by the Company by routinely checking the source documentation used to develop the performance objectives. These objectives may be changed from time to time by mutual consent of the Authority and the Company.

According to the Director of Transportation, the City's sole written standard for Transdev is that it "meets Federal standards when carrying out services." During the site visit, she stated that the City and Transdev try to work together to resolve any problems. In WSTA's response letter (see Attachment B), she added that the City has required Transdev to make "corrections to procedures and methods as necessary to ensure compliance." Over the course of the most recent contract, the City has not imposed any penalties on Transdev.

49 CFR § 37.23 obligates the City of Winston Salem to ensure that its contractors meet the relevant Part 37 requirements for Trans-AID service. The contract between the City and Transdev must clarify service provision requirements, including minimum performance standards, incentives and penalties, and regular reporting.

Transdev generates monthly reports for the City and the WSTA board. The data in the report related to Trans-AID includes a range of operations and service information. (See Attachment D for a sample Trans-AID report.) Five items began to appear in the reports in August 2015.

- Missed Trips
- No Shows
- Timely Services-On time percent
- Onboard Ride Times
- Telephone Performance (busy signals/hold times)

These are all important indicators for measuring Trans-AID service for compliance. However, the August report did not include this data.

Corrective Action Schedule: Within 60 days of the issuance of the final report, WSTA must:

- Establish service standards and performance objectives for Trans-AID service
- Regularly monitor its contractor and hold them accountable for service provision, using these service standards and performance objectives

6.13 Service Provided by Another Public Entity

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

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

Discussion: WSTA does not contract with or have an agreement with another public entity to provide complementary paratransit service on its behalf.

6.14 Coordination of Service

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

Discussion: WSTA fixed route service overlaps with the service the Piedmont Authority provides for Regional Transportation (PART), including fixed route bus. However, PART routes that overlap or are contiguous with WSTA routes fall under the definition of “commuter bus,” and don’t require complementary paratransit. Therefore, this requirement is not applicable to WSTA.

Summary Table of Compliance Review Findings

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days
1	Comparable complementary paratransit service	37.121	No deficiencies		
2	Absence of administrative burden	37.125 & 37.5	1 deficiency	Excessive number of days allowed to schedule eligibility determination interview	60 days from the date of the Transmittal Letter
3	ADA paratransit eligibility standards	37.123(e) (1)-(3)	1 deficiency 3 advisory comments	Written policy does not allow PCA and companion to accompany Trans-AID riders	60 days from the date of the Transmittal Letter
4	Accessible information	37.125(b)	1 deficiency	Does not promote availability of eligibility material in accessible formats in Guide for Riders or on website	60 days from the date of the Transmittal Letter
5	Eligibility determinations within 21 days	37.125(c)	1 deficiency	Does not consistently inform applicants of their right to presumptive eligibility if determination is not made within 21 days	60 days from the date of the Transmittal Letter

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days
6	Written eligibility determinations including specific reasons for denials or temporary or conditional eligibility	37.125(d)(e)	2 deficiencies	Letter denying eligibility does not include specific reasons for denial Letter granting conditional eligibility does not include specific reasons for the decision that are related to the applicants' inability to use the fixed route buses	60 days from the date of the Transmittal Letter
7	Recertification of eligibility at reasonable intervals	35.125(f)	No deficiencies		
8	Administrative appeals process for denials and conditional eligibility	37.125(g)	No deficiencies		
9	Complementary paratransit for visitors	37.127	1 deficiency	Does not have policy to provide complementary paratransit to visitors not already ADA paratransit eligible from another transit agency	60 days from the date of the Transmittal Letter
10	Types of service	37.129	No deficiencies		
11	Service area	37.131(a)	No deficiencies		

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days
12	Response time	37.131(b)	No deficiencies 1 advisory comment		
13	Fares	37.131(c)	No deficiencies		
14	No trip purpose restrictions	37.131(d)	No deficiencies		
15	Hours and days of service	37.131(e)	No deficiencies		
16	Absence of capacity constraints	37.131(f)	(See items 17-22 below)		
17	No restrictions on the number of trips provided to an individual	37.131(f)(1)	No deficiencies		
18	No waiting list for access to the service	37.131(f)(2)	No deficiencies		
19	No substantial numbers of significantly untimely pickups for initial or return trips	37.131(f)(3)(i)(a)	2 deficiencies	40-minute pickup window for Trans-AID service is too long Substantial number of significantly untimely pickups	60 days from the date of the Transmittal Letter

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days
20	No substantial numbers of trip denials or missed trips	37.131(f) (3)(i)(b) 37.131(3)(1)(b)	1 deficiency	Does not collect sufficient information to properly determine or record missed trips	60 days from the date of the Transmittal Letter
21	No substantial numbers of trips with excessive trip lengths	37.131(f) (3)(i)(c)	1 deficiency	Certain riders experience trips of excessive length on regular basis	60 days from the date of the Transmittal Letter
22a	No operational patterns or practices significantly limiting service availability (telephone hold times)	37.131(f)	1 deficiency	Insufficient telephone capacity to answer calls promptly during all service hours	60 days from the date of the Transmittal Letter
22b	No operational patterns or practices significantly limiting service availability (untimely drop-offs)	37.131(f)	1 deficiency	High proportion of untimely drop-offs for trips with requested appointment times	60 days from the date of the Transmittal Letter
23	Subscription Service	37.133	1 deficiency	Subscription trips in excess of 50 percent of total trips during certain hours on certain days when capacity constraints are present	60 days from the date of the Transmittal Letter

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days
24	No-show, late cancel and reasonable service suspension & appeal policies	37.125(h) (1)-(3)	4 deficiencies	<p>No-show suspension policy does not incorporate frequency of scheduled trips that result in no-shows or late cancellations</p> <p>No policy to excuse no-shows or late cancellations that are beyond a rider's control</p> <p>Does not collect and analyze pickup data that ensures that tally of no-shows is reliable</p> <p>No process to verify no-shows prior to communicating them with riders</p>	60 days from the date of the Transmittal Letter
25	Complaint Resolution & Compliance Information	27.13(b) & 27.121	2 deficiencies	<p>Inconsistent and incomplete contact information to submit ADA-related complaints</p> <p>Complaint procedures not in accessible formats</p>	60 days from the date of the Transmittal Letter
26	Non-discrimination	37.5	1 deficiency	Trans-AID suspension policy for violent or disruptive behavior is not consistent with fixed route policy	60 days from the date of the Transmittal Letter
27	Training	37.173	No deficiencies 1 advisory comment		

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency	Response Days
28	Service under contract with a private entity	37.23	2 deficiencies	Insufficient service standards and performance objectives for Trans-AID service Insufficient monitoring by City of contractor's service	60 days from the date of the Transmittal Letter
29	Service provided by another public entity	37.21(b)	Not applicable		
30	Coordination of service	37.139(g)	No deficiencies		

Attachment A
FTA Notification Letter to
Winston-Salem Transit Authority



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

Headquarters

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

June 8, 2015

Mr. Art Barnes
General Manager
Winston-Salem Transit Authority
1060 North Trade Street
Winston-Salem, NC 27101

Dear Mr. Barnes:

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. Winston-Salem Transit Authority (WSTA) has been selected for a review of its Trans-AID paratransit service to take place during the week of August 18–21, 2015.

The purpose of this review will be to determine whether WSTA 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 Trans-AID 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, August 18, 2015**, to introduce the Collaborative team and FTA representatives to WSTA, including you or your designee, the WSTA director of paratransit, 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 Trans-AID offices for the duration of their visit. Please let us know if you will designate a member of your staff to serve as WSTA'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 must be received within 21 calendar days of the date of this letter. These materials should be forwarded to:

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

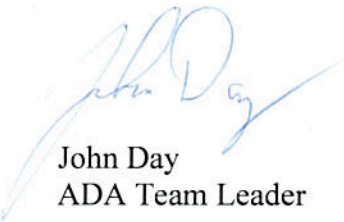
Enclosure 2 consists of items that the Collaborative team will review on-site beginning on July 14, 2015 after the opening conference.

We request the exit conference be scheduled for **2 p.m. on Friday, August 21, 2015**, to afford an opportunity for the reviewers to discuss their observations with you and your agency. We request that you or your designee, the WSTA director of paratransit, 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 WSTA, will be considered public documents subject to release under the Freedom of Information Act, upon request.

WSTA and Trans-AID 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 WSTA and Trans-AID staff.

Sincerely,



John Day
ADA Team Leader

cc: Yvette G. Taylor, FTA Region IV Administrator
Carlos Gonzalez, FTA Region IV Civil Rights Office
Roderick Cockerham, Trans-AID Director

Enclosure 1

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

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?
 - What standards have been set regarding acceptable numbers or percentages of ADA trip denials?
 - What travel time is considered comparable to fixed route and what travel time is considered too long? What are the goals for the percentages of trips to be provided within the standards?
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 on-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

Winston-Salem Transit Authority: 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
WSTA Response to Draft Report



December 30, 2015

**Department of
Transportation**

City of Winston-Salem
P.O. Box 2511
Winston-Salem, NC 27102
CityLink 311 (336.727.8000)
Fax 336.748.3370
www.dot.cityofws.org

Ms. Anita Heard
Equal Opportunity Specialist
Internal EEO Program Coordinator
Federal Transit Administration
Office of Civil Rights, TCR
1200 New Jersey Avenue
E54-420, East Building
Washington, DC 20590

RE: Comment on Paratransit Compliance Review Report

Mrs. Heard:

The City of Winston-Salem plans to correct deficiencies indicated in the final report. We are fully committed to correct actions which were found not in compliance with ADA regulations. Please see our comments to two sections in the Paratransit Compliance Review Draft Report dated October 2015.

Reference: Paratransit Eligibility Standards
Page 18

The draft report states that the use of a category to identify riders living outside the 3/4 mile area is unnecessary. The report suggests:

“For applicants whose home address is outside the complementary paratransit service area, an effective practice is to inform eligible riders that they are eligible for trips within the service area, **but not eligible for those to and from their home address.**”

For all practical purposes, this statement or policy would result in the blanket denial of trips outside of the 3/4 mile area in that the great majority of trips begin or end at a residence. Furthermore, Forsyth County; whose boundaries extend well beyond the 3/4 mile area, provides funding for Trans-Aid, and expects some degree of service.

Our current practice is to accommodate all ADA trips within the 3/4 mile area and accommodate those outside of the area should we have capacity. Therefore, we must have some way of identifying or classifying this trip category. We recognize, however that the current language in our Rider's Guide may be confusing and requires clarification.

CityLink311

Call 311 or 336-727-8000
citylink@cityofws.org

City Council: Mayor Allen Joines; Vivian H. Burke, Mayor Pro Tempore, Northeast Ward; Denise D. Adams, North Ward; Dan Besse, Southwest Ward; Robert C. Clark, West Ward; Molly Leight, South Ward; Jeff MacIntosh, Northwest Ward; Derwin I. Montgomery, East Ward; James Taylor, Jr., Southeast Ward; City Manager: Lee D. Garrity

Reference: Service Under Contract with a Private Entity
Page 38

The following information is provided to clarify the statement included in Section 6.12, (page 38) of the draft report:

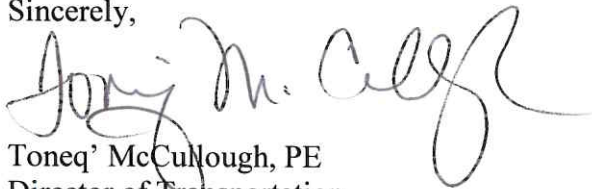
“According to the Director of Transportation, the City’s sole written standard for Transdev is that it “meets Federal standards when carrying out services.” She also stated that the City and Transdev try to work together to resolve any problems. Over the course of the most recent contract, the City has not requested any corrective actions from Transdev.”

Transdev maintains a service contract with the City of Winston-Salem to manage the Transit operation in the City. The Winston-Salem Transit Authority Board of Directors establish and make policy decisions for the Authority. City Council makes final budgeting decisions. The Department of Transportation (DOT) staff provide oversight and support at the direction of the Board of Directors and City Council. The DOT staff and Transdev staff work together to establish procedures to meet the requirements set by both.

Section 31 of Transit Management agreement with Transdev states that “the Company will comply with all local, state and federal laws, ordinances, decrees, orders, rules and regulations. In amplification thereof, the Company shall comply with all Federal Clauses required by the FTA for this type of Agreement....” This is the written standard referred to in the Director’s statement. While the City has required corrections to procedures and methods as necessary to ensure compliance, there have not been any penalties imposed on the Contractor or Transdev.

Please let me know if we can provide additional information to you.

Sincerely,

A handwritten signature in black ink, appearing to read "Toneq' McCullough". The signature is fluid and cursive, with a large loop at the end.

Toneq' McCullough, PE
Director of Transportation

CC: Art Barnes, General Manager, WSTA

Attachment C
Eligibility Application

Trans-AID Eligibility Application For Person's with Physical Disabilities

Trans-AID, a paratransit system operating in accordance with the Americans with Disabilities Act (ADA) of 1990, is designed to serve individuals whose disabling condition or functional limitation prevents them from using regular fixed route WSTA bus services.

Who Is Eligible?

Under the ADA regulations, individuals who qualify for paratransit services (known as Trans-AID) qualify for at least one of the following three categories:

1. The individual is unable, as a result of mental, visual or physical impairment as defined in the ADA to get on, ride, or get off an accessible vehicle of the WSTA fixed route bus system, even with training;
2. The individual can use or learn to use an accessible public transportation, **BUT** such a vehicle is not available on the route when the person wants to travel;
3. The individual has a specific impairment-related condition (including limitations of vision, hearing or disorientation), which prevents travel to or from the Downtown Transportation Center or stop of the WSTA fixed route bus system.

If at least one of the above items that applies to you, identify that item by filling in the corresponding number(s) _____. **(ex. If you have a mental or physical impairment and cannot access WSTA fixed route system, then you would fill in the #1).**

Eligibility: What You Should Know About This Program:

- Individuals who can access regular fixed route bus services are not eligible for Trans-AID service.
- Trans-ID service operates where the WSTA fixed route service operates, and during the same days and hours.
- If the applicant is determined to be eligible for this program, one of two designations may be made: Unconditional, Conditional, or Temporary. Unconditional eligibility indicates that the applicant can use Trans-AID services for all trips with the service area. Conditional eligibility indicates that some trips are eligible and some not, based on functional ability to use the WSTA bus system, given the specific environment and demands of each trip. Temporary eligibility indicates that your condition is not permanent and you have an expected duration of your disability.

How to Apply

1. Complete an ADA Paratransit Certification form attained from the ADA Coordinator.
2. If you believe you qualify for Trans-AID, complete part A of this application.
3. Provide the application – both parts A & B – to an authorizing professional. Both parts of the application must be completed in order for your application to be considered.
4. Mail the completed applications (both parts A&B) to:

Winston-Salem Transit Authority
Mobility Management Department
100 West Fifth Street
Winston-Salem, NC 27101

Or fax the completed application to (336) 748-3161

What Happens After I Turn in My Application

1. After WSTA has received your application, you will be contacted within 21 business days by the WSTA ADA Coordinator/staff to schedule an in-person interview and functional assessment to determine your eligibility based on the following factors:
 - a. Information provided on your application.
 - b. Information provided by your authorizing professional.
 - c. Results of a brief assessment of your actual functional abilities.
 - d. A review of available transportation options in the areas in which you desire to travel.
 - All in-person interviews and functional assessments are held at the Clark Campbell Transportation Center.
 - If needed, the WSTA ADA Coordinator will schedule an interview and functional assessment in your work setting.
2. If you have questions or have not been contacted within 21 business days of submitting your application, call the ADA Coordinator at (336) 727-2000. If you use a TTY, call 1-800-735-8262. If, at that time a determination of your eligibility has not been made, you will be temporarily eligible for Trans-AID service until such time as your application can be reviewed.
3. If you are denied Trans-AID eligibility, you will receive a letter regarding this decision and a copy of the Trans-AID Appeals Process. You have the right to appeal. For more information, contact the WSTA/ ADA Coordinator at (336) 727-2000. If you use a TTY, call 1-800-735-8262.

This application is available in alternative formats. If you would like additional assistance, please call (336) 727-2000. The information in this application will be used only to determine your eligibility for Trans-AID services, and will be kept confidential.

Trans-AID Eligibility Application Part A

Please complete the following information:

Name: _____ Date: _____

Birth date: ____/____/____

Address: _____

City: _____ State _____ Zip _____

Please list closest intersection to home: _____

Please provide directions to your home from the Transportation Center at 100 W 5th Street

Home telephone number: _____

Work/Other daytime telephone number: _____

If hearing impaired, TTY number: _____

Applicant's signature: _____

If the applicant was assisted by someone else to complete this form, please list contact information below:

Name: _____ Daytime phone: _____
Address: _____
Relationship to applicant: _____
Signature: _____

Applicant's emergency contact (if different from person assisting with application):

Name: _____ Daytime phone: _____

Relationship to applicant: _____

Have you used the WSTA fixed route bus system? _____ No _____ Yes

If yes, which routes? _____

Are you currently using fixed-route transportation? _____ No _____ Yes

What is the closest bus stop to your home? _____

If you do not know, check N/A. _____

Can you get to the bus stop by yourself? _____ No _____ Yes

If no, what limits you from getting there? _____

If you do not know, check N/A. _____

Language Ability (Please check all that apply) _____ English _____ Spanish
_____ Other (specify) _____

Please describe the disability or health condition that prevents you from using fixed route buses. (Please list all disabilities and/ or health conditions that apply)

Have you ever had a seizure?

☐ Yes

☐ No

If yes, what type? _____

Are you taking medication to control the seizure?

☐ Yes

☐ No

What is the expected duration of this individual's condition?

- ☐ Temporary: Approximate expected duration until ____/____/____
- ☐ Long-term: Potential for improvement or periods of remission
- ☐ Permanent: No expectation of functional improvement

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

- | | | |
|------------------------|---------------------------|----------------------|
| ____ Cane | ____ Manual wheelchair | ____ Service animal |
| ____ White cane | ____ Powered wheelchair | ____ Picture board |
| ____ Walker | ____ Powered scooter/cart | ____ Alphabet board |
| ____ Crutches | ____ Boarding chair | ____ Portable oxygen |
| ____ Prosthesis | ____ Transfer board | ____ None of these |
| ____ Other (describe): | | |

Please check any of the following environmental or individual factors which are applicable to your situation:

1. Environment:

If I use the Regular (Fixed Route), I must have:

____ a bench ____ a shelter ____ nothing additional

When crossing a street, I need:

____ curb cuts ____ tactile curb warnings ____ audible signals
____ accessible median strip ____ no more than (#____) lanes of traffic

I cannot make my way across ground which is:

____ paved or sidewalk ____ grassy ____ gravel ____ hilly

My ability to access transportation is affected by weather which is:

____ warm (above ____ degrees) ____ cold (below ____ degrees)
____ rainy ____ icy ____ windy

My ability to access transportation is dependent on the time of day. I cannot see in:

____ full daylight ____ partial daylight ____ darkness /semi-darkness

My ability to access stairs is as follows. I can manage:

____ only one or two steps ____ only with a handrail ____ no steps

2. Individual

How far can you walk **by yourself** or with the assistance of a mobility aid?

- ____ I can get from the curb in front of the house/ apartment
- ____ I can travel up to 3 blocks (1/4 mile)
- ____ I can travel up to 6 blocks (1/2 mile)
- ____ I can travel up to 9 blocks (3/4 mile)
- ____ I can't travel outside my house/ apartment

If you use a manual or powered wheelchair or scooter, what year, make and model is it?

If you use a manual or powered wheelchair or scooter, is it more than 30-inches wide, more than 48-inches long, or does it weigh more than 600 pounds (person plus mobility device)? ____ Yes ____ No

Part B of this application must be filled out by a health care or human services professional who is familiar with the applicants disabling condition and/or functional limitation.

Your signature on the application authorizes this professional to provide information to the Trans-AID regarding your eligibility for ADA services and any needed clarification of functional limitations due to your disabling condition.

In the space provided below, CLEARLY PRINT the name of the professional who will be verifying your application, and specify his/her position.

Name of professional: _____

Professional affiliation (check the appropriate designation):

- | | |
|---|--|
| <input type="checkbox"/> Licensed physician | <input type="checkbox"/> Licensed physical therapist |
| <input type="checkbox"/> Licensed occupational therapist | <input type="checkbox"/> Licensed social worker |
| <input type="checkbox"/> Nurse (LPN or RN) | <input type="checkbox"/> Certified psychologist |
| <input type="checkbox"/> Certified rehabilitation counselor | <input type="checkbox"/> Speech pathologist |
| <input type="checkbox"/> Vision specialist | <input type="checkbox"/> Orientation/Mobility specialist |
| <input type="checkbox"/> Audiologist/Hearing specialist | <input type="checkbox"/> MR/DD qualified specialist |

Personal Care Attendant(s):

Do you **require** a Personal Care Attendant (PCA) to travel with you to destinations outside of your home?

____ Always ____ Never ____ Sometimes

If you require mobility assistance from one or more Personal Care Attendants, please complete the following information:

Personal Care Attendant Name: _____

Telephone number: _____

Release of Information

Because I receive services from the following rehabilitation facility or health care professional or agency which is familiar with my disability, you have my permission to discuss or provide healthcare information to the ADA Coordinator of the Winston-Salem Transit Authority, should they need to contact you for the purpose of completing this certification procedure.

(Please use a separate form for each agency)

Name: _____

Address:

Staff person familiar with the case: _____

I understand that this information will be held by WSTA in the strictest confidence and will not be shared with any other person or agency, unless it is needed for an Appeal Hearing with the Trans-Aid Appeal Board.

Signature of Applicant: _____

Witness: _____

Date: _____

Trans-AID Eligibility Application – Part B

Professional ADA Verification

You are being asked by the applicant named in Part A of this application to provide information regarding his/her ability to use the public transportation services of the Winston-Salem Transit Authority. WSTA provides ADA paratransit services through Trans-AID to ADA eligible persons with disabilities who cannot use regular services. The information you provide will allow us to evaluate the request and determine the individual's specific needs. Thank you for your cooperation in this matter.

PLEASE NOTE: WSTA fixed route transit services available within the city are currently accessible to persons with disabilities who need lift-equipped vehicles, vehicles which kneel to the curb, and/or announcement of bus stops. The individual applying for Trans-AID service **MUST BE UNABLE TO ACCESS THESE SERVICES** due to:

- ~ Conditions which prevent them from getting to or from a WSTA fixed bus stop, or transferring between vehicles **and/or**
- ~ Conditions which prevent them from being able to get on, ride, or get off a lift-equipped vehicle.

Individuals for whom performing these tasks is inconvenient or uncomfortable are **NOT ELIGIBLE** for services, and you are asked to verify this information.

Eligibility for Trans-AID is determined on a trip by trip basis. It is **extremely important** that you provide specific information about the individual's **functional** limitations, so these determinations can be made. For example, an individual who can easily and safely get to the bus stop nearest their home may not be able to get to a bus stop at their desired destination and thus would be eligible for transportation based on the destination.

Please follow these steps to verify this application:

1. Read Part A of the application in its entirety.
2. Fill out Part B of the application completely, using the criteria provided.
3. Return the completed application to the applicant within 7 days of receipt. The applicant is responsible for returning the application to WSTA.
4. Be aware that you may be contacted for further information if questions remain about the applicant's abilities.
5. If you have any questions, contact WSTA at (336) 727-2000. If you use a TTY, call 1-800-735-8262 and ask to be connected to (336) 727-2000

Part B – Professional Verification, continued

Name of Client: _____

I have read Part A in its entirety: _____ Yes _____ No

I agree with the information provided in Part A: _____ Yes _____ No

1. In what capacity do you know the applicant?

2. How long have you known or worked with the applicant?

3. When did you last see or treat the applicant?

Please state more detailed information about the stated disability and the extent of the disability.

4. What is the formal diagnosis of the applicant's disability?

5. What was the date of onset?

6. What is the prognosis?

7. How does the applicant's disability/health condition affect daily life activities?

Part B – Professional Verification, continued

Please define reasonable expectations for each skill (reasonable walking distances, reasonable terrain that can be negotiated, reasonable time that applicant could stand and wait for a bus, etc.).

Walking distance to/from stops

Stepping on/off curbs and crossing streets

Negotiating hills/steep terrain

Standing time at bus stop

Boarding lift and non-lift buses

Other: _____

Can you define in more detail any environmental issues that may apply (temperature sensitivities - what temperatures would present unsafe or risky conditions for the applicant?)

Extreme heat/humidity

Extreme cold

Ice and/or snow

Poor air quality

Other:

Part B – Professional Verification, continued

Is the applicant taking any medication? IF YES, does this medication have any effect on their travel in the community?

<u>Medication</u>	<u>Dosage/ Frequency</u>	<u>Affect on Functional Ability (if any)</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

What is the expected duration of this individual's condition?

- ☐ Temporary: Approximate expected duration until ____/____/____
- ☐ Long-term: Potential for improvement or periods of remission
- ☐ Permanent: No expectation of functional improvement

Please choose the statement below which best represents your opinion regarding this individual's use of public transportation:

- ☐ This individual should be able to access public transportation successfully.
- ☐ This individual can use public transportation under certain situations as stated above.
- ☐ This individual cannot use public transportation due to multiple functional limitations

Thank you for your assistance!!

Date: _____

Signature: _____

Printed Name: _____

Address: _____

Phone # _____

Organization / Practice: _____

Winston Salem Transit Authority

Trans-AID Paratransit Services

Trans-AID Application Agreement

I, _____, have received and read the Trans-AID Eligibility Application for persons with disabilities. I have read and understand who is eligible, how to apply for Trans-AID, and the process of qualifying for services after I turn in the completed application. I understand that it is my responsibility, or an appointed representative, to read the guidelines and requirements of the Trans-AID eligibility process.

I understand that both Part A and Part B must be completed in order for the application to be considered eligible, and that Part B of the application has to be completed by an authorizing professional.

I also understand that I will be contacted within 21 business days after the receipt of the completed application by the WSTA ADA Coordinator, who will schedule an in-person interview and functional assessment at the Clark Campbell Transportation Center at 100 West 5th Street in Winston-Salem, NC.

It is further acknowledged that the determination of my eligibility is based on the completed application, information provided by the authorizing professional, the assessment of my functional capabilities, and the review of available transportation options in the areas in which I desire to travel.

(Applicant's Signature)

(Date)

Attachment D
Sample Board of Directors Report

**Fixed-Route
Board Report August 2015**

INDICATORS	MONTHLY		YEAR- TO- DATE	
	Aug-15	Aug-14	Aug-15	Aug-14
Passengers	270,741	293,473	534,599	570,918
Wheelchair Passengers	1,235	1,671	2,359	3,172
Bicycle Passengers	1,906	1,644	3,677	3,296
Revenue Miles	135,184	135,184	272,784	271,576
Passengers/Revenue Mile	2	2	2	2
Vehicle Accidents	2	9	5	12
Veh Accidents/100,000 Miles	1	7	4	9
Preventable Vehicle Accidents	0	4	3	7
Preventable /100,000 Miles	0	3	1	5
Passenger Accidents	0	0	0	0
Psgr Accidents/100,000 Passengers	0	0	0	0
Prev/Psgr Accidents	0	0	0	0
Prev/100,000 Passengers	0	0	0	0
Employee Accidents	0	0	0	1
Preventable/Employee Accidents	0	0	0	0
Complaints	30	30	71	81
Complaints Chargeable	6	1	10	7
Days of Operation				
Weekdays	21	21	44	43
Saturdays	5	5	8	9
Sunday	5	5	9	9
Special Services				
Passengers	11,137	0	11,307	11,347
Service Miles	1,995	0	2,101	2,186
Service Hours	528	0	551	533

Trans-Aid Board Report August 2015

INDICATORS	MONTHLY		YEAR- TO- DATE	
	Aug-15	Aug-14	Aug-15	Aug-14
Passengers	18,011	15,161	36,496	30,345
Wheelchair Trips	2,331	2,162	4,898	4,442
Vehicle Miles	89,293	79,344	181,336	157,112
Passengers/Revenue Hour	3	3	3	3
Vehicle Accidents	2	0	6	0
Preventable Vehicle Accidents	0	0	1	0
Passenger Accidents	0	0	0	0
Preventable Passenger Accidents	0	0	0	0
Employee Accidents	1	0	1	0
Preventable Employee Accidents	0	0	0	0
Complaints	22	13	38	19
Complaints Chargeable	3	1	8	2
Vehicle Hours	6,278	5,466	12,779	10,950
Revenue Vehicle Hours	5,897	5,128	11,969	10,273
Service Vehicle Hours	5,887	5,128	11,951	10,273
Missed Trips				
No Shows				
Timely Services- On time %				
Onboard Ride Times				
Telephone Performance (bus signals/hold times)				

Maintenance Board Report August 2015

INDICATORS	MONTHLY		YEAR- TO- DATE	
	Aug-15	Aug-14	Aug-15	Aug-14
Revenue Vehicles	158	158	158	158
Vehicle Accidents	1	0	2	0
Preventable/Vehicle Accidents	0	0	0	0
Employee Accidents	0	0	0	0
Preventable/Employee Accidents	0	0	0	0
Employees	24	24	49	48
Vehicle/Employee	7	7	13	13
Mechanic Hours	2,181	2,347	3,447	3,932
Maintenance Hours	4,727	4,584	7,475	7,123
Road Calls				
Fixed Route	21	38	65	76
Major	0	4	10	8
Minor	21	34	55	68
Trans-AID	11	11	23	20
Major	2	2	6	2
Minor	9	9	17	18
Inspection Hours	937	1,268	1,499	1,868

Winston-Salem Transit Authority									
Consolidated Statement of Revenues and Expenses									
For Period 12 Fiscal Year 2014-2015 (Not Final subject to change)									
Current Month		Transit Operating Revenues				Year to Date			
Budget	Actual		Budget	Actual		Actual	Projection		
\$ 106,333.33	\$ 191,711.78	General Farebox	454101 \$	1,276,000.00	\$	1,258,750.79	\$	1,276,000.00	
\$ 36,400.00	\$ 46,696.00	Ticket Sales	454102 \$	436,800.00	\$	460,609.91	\$	436,800.00	
\$ 208.33	\$ 200.00	Park & Ride Shuttle	454104 \$	2,500.00	\$	1,434.00	\$	2,500.00	
\$ -	\$ -	West End Trolley	454105 \$	-	\$	760.47	\$	-	
\$ 2,390.00	\$ 2,413.11	Greyhound	454107 \$	28,680.00	\$	26,333.34	\$	28,680.00	
\$ 2,083.33	\$ 2,196.81	Advertising	4542 \$	25,000.00	\$	46,575.42	\$	25,000.00	
\$ 4,583.33	\$ 103,972.00	JARC	454313 \$	55,000.00	\$	103,972.00	\$	55,000.00	
\$ 12,500.00	\$ 26,286.70	City Vehicles	454401 \$	150,000.00	\$	256,756.20	\$	150,000.00	
\$ 3,333.33	\$ 1,439.55	Other Vehicles PART	454402 \$	40,000.00	\$	1,439.55	\$	40,000.00	
\$ 1,500.00	\$ 1,241.01	Vending Machine Revenue	454901 \$	18,000.00	\$	15,793.32	\$	18,000.00	
\$ 8,333.33	\$ -	Misc Revenue	454909 \$	100,000.00	\$	70,552.45	\$	100,000.00	
\$ -	\$ -	Invoice Late Fees	456527 \$	-	\$	1,257.11	\$	-	
\$ 9,970.00	\$ 23,884.60	Part Reimbursements	4833 \$	119,640.00	\$	68,463.76	\$	119,640.00	
\$ 96,517.50	\$ 94,488.00	Federal Money-Operating	611001 \$	1,158,210.00	\$	1,133,856.00	\$	1,158,210.00	
\$ 201,055.00	\$ 196,684.58	Preventive Maintenance	611003 \$	2,412,660.00	\$	2,360,215.00	\$	2,412,660.00	
\$ 25,098.33	\$ -	State	6120 \$	301,180.00	\$	186,232.00	\$	301,180.00	
\$ 242.50	\$ 2,898.01	Debt Service	810200 \$	2,910.00	\$	2,898.01	\$	2,910.00	
\$ 425,663.33	\$ -	Transit Admin Fund	810534 \$	5,107,960.00	\$	-	\$	5,107,960.00	
\$ 833.33	\$ 100.00	Damage Settlement	65 \$	10,000.00	\$	17,644.17	\$	10,000.00	
\$ 22,500.00	\$ 308,130.87	Motor Vehicle Licenses	4231 \$	270,000.00	\$	308,130.87	\$	270,000.00	
\$ -	\$ 216,306.49	Property Tax Transfer	4009 \$	-	\$	4,790,671.84	\$	-	
\$ 959,545.00	\$ 1,218,649.51	Total Operating Revenues	\$	11,514,540.00	\$	11,112,346.21	\$	11,514,540.00	
Current Month		Trans-AID Revenues				Year to Date			
Budget	Actual		Budget	Actual		Actual	Projection		
\$ -	\$ 30.00	Ticket Sales	454102 \$	-	\$	2,235.00	\$	-	
\$ 19,500.00	\$ 17,651.76	Medicaid	454308 \$	234,000.00	\$	178,442.04	\$	234,000.00	
\$ 8,333.33	\$ 12,500.00	EDTAP	454311 \$	100,000.00	\$	85,048.40	\$	100,000.00	
\$ 208.33	\$ -	Misc Revenue	454909 \$	2,500.00	\$	3,642.23	\$	2,500.00	
\$ 88,620.83	\$ -	State	6120 \$	1,063,450.00	\$	1,063,450.00	\$	1,063,450.00	
\$ 13,565.83	\$ 62,850.69	County	613 \$	162,790.00	\$	184,943.19	\$	162,790.00	
\$ 26,833.33	\$ 57,587.00	Piedmont Triad COG	6141 \$	322,000.00	\$	298,843.00	\$	322,000.00	
\$ 88,205.83	\$ -	Transit Admin Fund	810534 \$	1,058,470.00	\$	-	\$	1,058,470.00	
\$ -	\$ 250,692.67	Property Tax Transfer	4009 \$	-	\$	1,184,025.66	\$	-	
\$ 245,267.50	\$ 401,312.12	\$	\$	2,943,210.00	\$	3,000,629.52	\$	2,943,210.00	
Current Month		Transit Operating Expenses				Year to Date			
Budget	Actual		Budget	Actual		Actual	Projection		
\$ 99,018.54	\$ 144,264.85	Administration	5331 \$	1,188,222.47	\$	1,178,851.20	\$	1,188,222.47	
\$ 75,630.83	\$ 91,245.11	Mobility Management	5332 \$	907,570.00	\$	912,522.99	\$	907,570.00	
\$ 559,125.44	\$ 685,815.68	Operations	5333 \$	6,709,505.29	\$	6,706,868.19	\$	6,709,505.29	
\$ 203,548.47	\$ 266,425.30	Maintenance - Vehicles	5334 \$	2,442,581.59	\$	2,208,236.81	\$	2,442,581.59	
\$ 13,113.90	\$ 8,980.93	Maintenance - Non Vehicles	5335 \$	157,366.85	\$	114,235.56	\$	157,366.85	
\$ -	\$ -	Transit Planning	5336 \$	-	\$	-	\$	-	
\$ 9,970.00	\$ 4,954.10	PART		119,640.00	\$	51,176.24	\$	119,640.00	
\$ 960,407.18	\$ 1,201,685.97	Total Operating Expenses	\$	11,524,886.20	\$	11,171,890.99	\$	11,524,886.20	
Current Month		Trans-AID Expenses				Year to Date			
Budget			Budget				Projection		
\$ 46,888.33	\$ 61,615.42	Trans-AID Admin	5321 \$	562,660.00	\$	520,940.49	\$	562,660.00	
\$ 169,712.50	\$ 235,742.13	Trans-AID Operations	5323 \$	2,036,550.00	\$	2,083,645.92	\$	2,036,550.00	
\$ 29,193.38	\$ 43,800.09	Trans-AID Maintenance	5324 \$	350,320.53	\$	403,959.28	\$	350,320.53	
\$ 245,794.21	\$ 341,157.64	Total Oper. Exp Before Deprec	\$	2,949,530.53	\$	3,008,545.69	\$	2,949,530.53	