

# Transcript

## FTA ADA Circular Webinar 4: The ADA and Demand Responsive Service Requirements

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Okay. Thank you, everyone, for your patience while we've been struggling with the technology. Everything appears to be working now. So welcome to the fourth in a series of webinars on the FTA ADA Circular. This one will cover demand response of service. I am John Day Program Manager for Policy and Technical Assistance in the Office of Civil Rights here at FTA. With me is Dawn Sweet, Program Manager for Complaints and Communication, who will be handling the Q&A box today, and Richie Nguyen, Equal Opportunity Specialist, who is running the technology and will help us with Q&As as they come up.

Due to the size of the audience today, everyone is muted, but we do want this to be as interactive as possible, so please use the Q&A box for all questions. You can ask those questions at any time during the presentation. We will do our best to keep up. Once a question has been answered, we'll post it on the screen, and we may not have time to get to all of the questions, but we will post Q&A later on, on the Civil Rights Training page.

We are going to start today with some background on the Circular. We will cover Chapter 7, which covers demand responsive service, and then, as I said, we will have an opportunity for some questions.

In developing the Circular, we wanted to create a plain-English reference on the DOT regulation to help people better explain the requirements, which span four chapters of the Code of Federal Regulations, a rather imposing body of regulations in and of themselves. It's our hope is by using it, it will help you to avoid oversight findings in various compliance reviews that we conduct. We should stress that it contains no new requirements, though there may be some that seem new to you, and we are hoping that this circular in general provides a one-stop shopping point for all of your ADA needs. So that's sort of our intent in developing the Circular.

It covers 12 chapters in all, and this may seem imposing enough in and of itself, but it's important to remember that this is intended as a reference document, not to be read cover to cover like a novel. The topic of today, as I said, is Chapter 7 on demand responsive service. We do have to stress here that demand responsive service is not ADA complementary paratransit service. The term paratransit gets used a lot to mean any type of demand responsive service, but it's important to understand that it has a specific meaning under the ADA, and paratransit is covered in Chapters

8 and 9 of the Circular. What we are talking about is demand responsive service, which is addressed, as I said, in Chapter 7.

Other relevant chapters to demand responsive service -- and they are relevant because they apply to all forms of transportation, not just demand responsive -- but there are several other chapters that are relevant. Chapter 1 covers services under contract or other arrangement. Chapter 2 covers general requirements, including lift use and securement, service animals, personnel assistance and training, maintenance of accessible features, accessible information, and reasonable modification of policy. All of those apply across the board, including demand responsive service. And Chapter 4 covers vehicle acquisition and specifications. So those are other chapters in the Circular that will be relevant. We are not covering them today. We either covered them in previous webinars or will in upcoming webinars.

So what is demand responsive service? The ADA regulations define it as any system transporting information which is not a fixed route system. That's pretty much the official definition in the rules, and it's not really terribly helpful. So we have to look at sort of what is a fixed route and work our way backwards from there.

So a fixed-route system means a system of transporting individuals on which a vehicle is operated along a prescribed route according to a fixed schedule. So if it's not that, it's probably demand responsive service.

So how do we determine what is demand responsive service? Primarily, it's whether the rider must request service in advance. With fixed-route service, no action by the individual is needed to initiate public transportation. If you are at the bus stop at the time the bus is scheduled to appear, you will be able to get on the bus and access the transportation system. With demand responsive service, an additional step must be taken by the individual before he or she can ride the bus, such as making a phone call.

Other factors, such as the presence or absence of published schedules or the variation of vehicle intervals in anticipation of difference in usage, like peak period service versus off peak, are less important when making the distinction between two types of service.

If a service is provided along a given route and the vehicle will arrive at certain times regardless of whether a passenger actively requests it -- the service in most cases should be regarded as fixed route rather than demand responsive.

So why is this distinction so important? One of the reasons is that for public operators of demand responsive systems, you are permitted to acquire inaccessible vehicles; that is, so long as the system, when viewed in its entirety, provides equivalent service to persons with disabilities. And there is a certification that's required before you can do that. Before requiring inaccessible vehicles, the regulations require a public entity to certify that the service using a future fleet with the inaccessible vehicles will be equivalent to riders with disabilities, including riders who use wheelchairs. In the Circular, we provide Attachment 7-1, which is the certification form for entities to complete. That also appears in the regulations themselves. I believe it may be Appendix C, but don't quote me on that. See Attachment 7-1 in the Circular.

Certifications are valid for one year, meaning the entity will have to recertify before acquiring additional inaccessible vehicles through future procurements.

An equivalent service exists where service is provided in the most integrated setting; and the level of service for individuals with disabilities is equivalent to the level of service for individuals without disabilities based on seven service characteristics that we will discuss in a moment.

Where all vehicles in a demand responsive fleet are fully accessible, the equivalent service standard does not apply. It only applies where you're acquiring inaccessible vehicles. Basically because a 100% accessible fleet is already capable of providing equivalent service. Anybody regardless of disability can request a ride on any bus, and any bus in the fleet can show up and accommodate them. But it's important to stress that the nondiscrimination requirements that are found in Section 37.5 and discussed in Chapter 2 of the Circular apply to all demand responsive services. So for example, if you have a system with 100% demand responsive fleet, it would be discriminatory to charge a higher fare to riders with disabilities for say using a lift or provide them a poorer response time in comparison to the service provided to riders without disabilities. So that would not be allowed. The general nondiscrimination requirements still apply.

In general, providing service in the most integrated setting appropriate on the same vehicle means providing service on the same vehicles and together with all other riders. When the service provided is demand responsive, there might be limited circumstances when the use of a separate vehicle is necessary, but we expect those instances to be extremely rare. It's also important to keep service integration in mind when you are putting together the specs for your accessible vehicles. You may be tempted to specify a vehicle with five wheelchair locations and no seats if that's something that you think would satisfy your demand better, but that's not really service in an integrated setting. You're segregating wheelchair users into one vehicle and everyone else into another, and that's something that we would discourage. Instead, we would encourage agencies to acquire vehicles that accommodate a mix of all riders, which would be a prerequisite to fulfilling the most integrated setting requirement.

Okay. So as we said, you can acquire inaccessible vehicles if you can provide equivalent service, and here are those seven characteristics of equivalent service: Response time; fares; service area; hours and days of service; any restrictions or priorities based on trip purpose; the availability of information and reservations capability; and any constraints on capacity or service availability. And it's important to understand that these are separate and apart from the complementary paratransit service criteria. With a paratransit system, the comparability is as compared to a fixed-route system. With demand responsive service, the comparison is between a person with a disability, including a wheelchair user, their experience using the service as compared to a non-disabled person who is using the service. So a little bit different comparison there. The regulation requires the level of service provided to be equivalent.

Two of these characteristics come up a little bit more than others in our experience, so we wanted to touch a little bit on those. And those are response time and capacity constraints and service availability. So response time, basically, you need to make sure that an accessible vehicle is dispatched to those who need it on the same basis as those who do not. You can't, for example,

make wheelchair users call three days ahead while everyone else gets next-day service. That would not be an equivalent response time. So if somebody –if a nondisabled person can call and get a ride in an hour, then that’s the expectation for a rider with a disability, again, always including wheelchair users.

Capacity constraints. Things like trip denials, waiting lists, trip caps, trip purpose restrictions or priorities, all of these things are allowed in demand responsive service as long as, again, they are applied equally to all riders, people with and without disabilities. The regulations don’t prohibit demand responsive services from having trip denials or providing trips on a first-come, first-served basis; however, to be considered equivalent, riders with disabilities will encounter trip denials at the same frequency as riders without disabilities. The regulations don’t prohibit the use of waiting lists or trip caps, as long as riders with disabilities are not wait-listed more often or do not have more restrictive trip cap limitations. For example, it’s certainly appropriate to, you know, limit all riders to 20 trips a month, but you couldn’t limit riders to 20 trips a month and then say wheelchair users only get 10 trips a month. That would not be equivalent service.

The regulations also don’t prohibit demand responsive services from having poor rates of on-time performance or having long travel times, as long as riders with disabilities do not experience lower on-time performance rates or longer ride times than other riders. So you know, you can provide whatever level of service you want as long as it’s equivalent to riders with and without disabilities.

So there are sections in the Circular that touch on various types of demand responsive services, and we’ve highlighted them here: Dial-a-ride, taxi subsidy, vanpool, and route deviation. And we’ll get a little bit into each of those as we move on.

Dial-a-ride service is probably the most common type of demand responsive service. It usually operates in a defined area, such as a city, county, or transit agency jurisdiction, and during advertised days and hours. Pickups and drop-offs typically take place anywhere within the service area, and you typically find dial-a-ride service in suburban and rural areas that don’t have sufficient population density to support fixed-route service.

Riders typically request a pickup time by calling, and then the service providers develop schedules and routes according to those requests. Again, service has to be equivalent to passengers with and without disabilities, including wheelchair users and including in the most integrated setting.

The Circular also has a section on taxi subsidy service. Basically, transit agencies in this model contract with taxi companies to provide service, and you typically see either a user-side or provider-side subsidy. A user-side subsidy program would be something like the transit agency selling discounted vouchers to riders who arrange trips directly with the taxi companies and use the vouchers as payment. On a provider-side subsidy program, the riders may arrange their trips through a transit agency which then contracts with taxi companies for service and subsidizes a portion of the fare through direct agreement. The difference is who is initiating the trip and who is being provided the subsidy directly.

Agencies are responsible for providing equivalent service to individuals with disabilities,

including those who use wheelchairs, who qualify for these types of services. Taxi subsidy programs that use only inaccessible taxicabs would not meet the regulatory requirement for equivalency. One way to provide equivalent service is to work with participating taxi companies to incorporate accessible vehicles into their taxi fleets. Another way might be to contract with other companies that can provide accessible service and negotiate terms so that the riders requiring accessible vehicles receive equivalent service without being charged a higher fare.

And it's important for transit agencies operating taxi subsidy programs to monitor response time for people with disabilities, including those who use wheelchairs, to ensure that these riders experience comparable response times to other riders. With respect to fares, equivalency means all riders pay the same fares for comparable trips, regardless of the actual cost of providing taxi service. So let's say you set up your taxi subsidy program, and you have two cab companies. One has regular automobiles and the other has accessible vehicles. They each have fare structures and the one with accessible vehicles has a higher fare structure. You would have to negotiate the terms of your taxi subsidy program so that the rider doesn't pay any more for needing an accessible vehicle than they would if they rode in the other provider's sedans.

So that's an important consideration for service equivalency.

Vanpools are another form of transportation that the ADA regulations regard as demand responsive. Basically, a vanpool is a voluntary commuter ridesharing arrangement using vans or buses which provides transportation to a group of individuals traveling directly from their homes to their regular places of work within the same geographic area and which the commuter driver does not receive compensation beyond reimbursement for his or her costs for providing the service. It's more or less lifted straight from Section 37.3 of the regulations. And typically, entities that sponsor and administer vanpools coordinate the creation of vanpool rider groups, set the cost of the service, and collect regular payments from riders. And they also tend to purchase or lease, insure, and maintain the vans.

And the important consideration for service equivalency for vanpools is that in vanpool systems operated by public entity in which they own, purchase, or lease the vehicles, they are subject to the equivalent service requirements that apply to general public demand responsive services. Meaning they must be prepared to accommodate requests to participate in the vanpool from individuals with disabilities, including those who use wheelchairs. If riders without disabilities can join an existing vanpool in one to two days, for example, equivalent response time means riders who use wheelchairs can join a vanpool in the same timeframe. So again, equivalent service is the key.

Route deviation service is sort of a hybrid approach to demand responsive service. Essentially, it operates along established routes to have designated stops, but between these stops, they can deviate from the established route to pick up or drop off riders within a defined off-route service area. And transit agencies operating route deviation service typically ask riders to call in advance to request off-route pickups, and typically you will find all of the vehicles using route deviation service are accessible as it would be difficult to provide equivalent service with a mixed fleet. If a rider needs an accessible vehicle and they can pick it up, you know, by waiting for the

next bus at the bus stop, the next bus at the bus stop had better be accessible or you're not providing equivalent service.

So the central issue in any route deviation discussion is whether ADA paratransit is required. On paper it looks like an easy solution, it looks black and white. Fixed route means a vehicle is operated along a prescribed route according to a fixed schedule. Demand responsive means essentially service is initiated by the rider. But as I said, route deviation is a hybrid that doesn't always neatly fit into those categories.

Appendix D to the regulations does state that a system that permits user-initiated deviations from routes or schedules is considered a demand responsive service. So route deviation, because it permits user-initiated deviations from the route, the regulations specifically say that's regarded as demand responsive service.

However, to be considered demand responsive, a system must deviate for the general public. If deviations are restricted to a particular group, the service ceases to be demand responsive for the general public, and ADA paratransit is required. So we need to look closely at the service characteristics in that case.

So what makes route deviation demand responsive? It deviates for everyone or anyone. It's publicly advertised as a route deviation service. We would like people to avoid demand responsive service that looks to be demand responsive on paper only. You know, things like it's route deviation, but we'll deviate as much as two blocks from the route to pick somebody up, or you know, we'll deviate for anyone, but we are going to charge you 20 bucks to do it. You know, things like that. Or simply not advertising it as route deviation service. You know, you kind of have to know that you can call in advance to get a deviation, and most people don't know that, so essentially it operates as a fixed-route system. Those are all characteristics of something that, you know, might appear to be demand responsive on paper only.

We would look for reasonable service criteria. As a starting point, we would suggest something along the lines of the paratransit criteria when setting parameters. If you are going to deviate, maybe think about deviating three-quarters of a mile off the route. And if you are charging an extra fare, maybe no more than double the fixed-route fare. Again, this is for route deviation service for anyone.

Nondiscrimination, again, is the standard for demand responsive service. People with disabilities need to have access to the same level of service as everyone else. So if you have all these things in place, it deviates for anyone, it's publicly advertised as route deviation service, the service is nondiscriminatory, if all that's in place, then you're demand responsive and you don't have a paratransit obligation in connection with that service.

Now, having said that, there's sort of another hybrid-hybrid option that has been put forth by at least one transit system that we are aware of, and they said we are not operating route deviation. What we are doing is we have a regular fixed-route service, and we are operating paratransit service, but we are doing it all on the same bus. And operationally, that seems to be a little bit difficult, but if it works for them, there's no reason it shouldn't work for us. So basically, what we said in that case is that as long as the portion of the service that you are calling paratransit meets all

of the paratransit requirements -- eligibility, all of the service criteria, it provides origin-to-destination service, it's free of capacity constraints, and you can demonstrate to us that all of those requirements are being met, then this is an okay service delivery option. But as I said, it's sort of a hybrid of a hybrid. It's not technically a route deviation service; it's commingled service with fixed route and paratransit being operated on the same vehicle. It's a little complex, I think, to implement, but like I said, where it works, if you can make it work, then there's no reason you shouldn't be able to do that.

We do expect transit agencies to sufficiently monitor their demand responsive service, whether it's provided in house or by contractors, in order to confirm that the service is being delivered in a consistent manner with the ADA requirements. We don't dictate the specifics of an agency's monitoring efforts. Approaches for monitoring demand responsive service will vary based on the characteristics of the service and local consideration. And the Circular provides guidance on how to monitor service, in particular, monitoring for equivalency.

Determining equivalency in the area of service capacity and availability requires a more detailed analysis of various service constraints and limitations, such as waiting lists, trip paths, trip denials, on-time performance, and onboard ride times. And each of these areas, FTA suggests the transit agencies compare the experiences of riders with disabilities, particularly those who use wheelchairs and need accessible vehicles, with the experiences of other riders. So again, it's important to monitor and make sure that equivalent service is being provided to everyone.

I did say this was a rather short chapter in the Circular, so it's been a rather short presentation. So that's our introduction to Chapter 7 of the FTA ADA Circular. I am sure we've got some questions, so Dawn, what do we have?

>> DAWN SWEET: Yeah, we do. We've got some pretty interesting questions and some pretty complicated ones for you, John, especially on vanpooling.

>> JOHN DAY: There's three of us in here.

>> DAWN SWEET: Maybe we'll start with some of the more straightforward ones.

I was in the middle of typing out a response to this question, but I think we can handle it over the phone so everyone's not waiting for you to go.

The question is "Do the ADA paratransit riders have to go through an eligibility process for the commingled example?" So when you are commingling ADA paratransit customers, either on the fixed-route bus -- the Circular also discusses commingling ADA paratransit riders with dial-a-ride riders as well. So do they have to go through a process?

>> JOHN DAY: In general, paratransit is supposed to be strictly limited to those people who meet the eligibility requirements, so the eligibility requirements would apply. And I am not sure how you would know if you are providing the required level of service to people who are entitled to paratransit if you don't go through some sort of eligibility process and know who they are.

Having said that, the regulations also don't say that you can't offer extra service or additional service to other people. So it's kind of a little of both, but I would lean on the side of certifying eligibility.

>> DAWN SWEET: Okay. I'll take this question. Do you know where the agency is that does

commingle fixed route? We are aware of a couple systems. It's hard to do if you have high demand, but if you've got some lag time built into your headway, it's not a lot of demand, it is possible to deviate and provide ADA complementary paratransit that meets all of the Subpart F requirements.

We would have to look around a little, but I would suggest that you, anybody else who has questions about this topic or any other ADA or civil rights topic to submit it through FTA's Contact Us Tool. You will find an icon at the bottom of FTA's homepage. You click on it, and it will bring up a drop-down menu, and just select "Civil Rights and Accessibility," and your question will get routed real-time to the Office of Civil Rights. So again, for that question, just contact us through Contact Us, and we can do a little research and put you in contact with some other agencies.

All right. Let's stick with route deviation. This question is when doing deviated fixed route or route deviation, does one have to deviate from all fixed stops?

>> JOHN DAY: I think the key is that you take requests for deviations from people who request it, and you deviate accordingly. There may be some cases where a route may operate in route deviation mode in the suburbs and then when it gets in the downtown area it becomes fixed route, and the regulations do say for the portion of that service that's operated as fixed route, you do need complementary paratransit. So in the downtown area where it does not deviate, that would be part of your paratransit service area. In the suburbs where it's operating in route deviation mode, it's demand responsive and would not require paratransit.

>> DAWN SWEET: I will take this question, and it's an important one. "What constitutes a noncommuter or fixed route?" It's important because the ADA requirements except for commuter service. It becomes critical to define appropriately whether your bus service, for example, is commuter or noncommuter. The regulations define commuter bus in terms of service characteristics, and it's often a mix of ten or so characteristics, but some of the big ones are it typically runs during commuter hours. For example, it often is of an extended length. But it doesn't typically comprehensively cover a neighborhood. Often you purchase tickets to ride it. So you need to look at all of those characteristics and then make an assessment of whether your service is, in fact, commuter bus or regular fixed route, where paratransit would be required.

And there is a section in Chapter 7 on making that assessment, and there's a link within that section to a complaint decision letter on our website that gives some information on an assessment we did during an investigation. Alright, so let's go back to route deviation.

In the case of deviated fixed route or route deviation, is there a minimum number of times it needs to deviate to avoid being considered a fixed-route system?

>> JOHN DAY: The answer to that is generally no, the regulations don't prescribe. You know, it's all in how it operates, you know, from the passenger's point of view.

So every system's going to be a little bit different, and there's no prescribed number of deviation, there's no prescribed area for deviations. All the regulations tell us is that if a system permits user-initiated deviations from the route, it's considered demand responsive, and as we said during the presentation, we would look for things that might make it look to be demand responsive in



name only versus truly demand responsive I think is the best answer we can give.

>> DAWN SWEET: Okay. This is a good question. We get variations of this quite a bit. And I'll just say verbatim. "Is this correct? Our Subsidiaries who provide route deviation demand responsive service do not have to make reasonable accommodations for door to door because they are providing route deviation for all passengers?" Door-to-door is a unique requirement of ADA complementary paratransit service.

>> JOHN DAY: Yes, origin to destination is part of the nature of complementary paratransit service. It's not something that would apply to route deviation service. You know, everybody is entitled to the same service. So that's not one of the requirements for route deviation.

>> DAWN SWEET: All right. I am going to go to some of the questions that came in a little bit earlier that were a little complicated that would be better to talk these out. The first one -- let's see here -- I think this is route deviation. If there is a fixed schedule for a limited number of time points at which passengers can board without advance request, do passengers have the option of requesting a pickup or drop-off at an alternate location not on the published schedule, either along the route or deviating from the regular route, does FTA consider this to be fixed route or demand responsive?

>> JOHN DAY: That is a rather complicated one. I am not sure I have a good answer to that. I think we would have to look at the service itself and probably try to ascertain for ourselves what it looked most like. You know, I don't know that -- if you are passing time points and you are only stopping if somebody is waiting at the bus stop, a lot of fixed-route systems operate that way. They will stop only if somebody is waiting at the bus stop. I don't think that in and of itself is dispositive. But if you can request that the bus deviate from the route to come pick you up at your house, for example, then that probably factors in favor of demand responsive service.

>> DAWN SWEET: Yeah, definitely for the entity that submitted that question and any others, again, feel free to follow up and contact us. You can give us a little more details, and we can respond. And the Contact Us Tool, it is a technical assistance tool, so we are not making assessments of compliance. We are just offering some guidance to point you in the right direction.

Alright. We've got two questions that I saved on vanpool service. So the first one is if a public transit agency subsidizes a vanpool via a third party who owns the vehicle, are they still responsible for providing accessible service if a third-party agency does not have such a vehicle?

>> JOHN DAY: Well, and I think you have to go back to service under contract or other arrangement. Clearly, there is an arrangement between the transit agency and the third party, so the third party essentially stands in the shoes of the transit agency, so the transit agency can either expect the third party to come up with the accessible vehicle when needed or find some other way through their vanpool program to provide an accessible vehicle.

>> DAWN SWEET: Okay. This is a related question from another entity. Do entities that contract out their vanpool service subject to these requirements; whereas, they do not own, purchase, or lease the vehicles but, rather, pay for the service only?

>> JOHN DAY: Again, I think you are looking at a contract or other arrangement type of situation where the vanpool entity would stand in the shoes of the public entity. I think that's the

best answer I can give.

>> DAWN SWEET: All right. Let me take a look here.

If you deviate part of your fixed route, is it demand responsive?

>> JOHN DAY: The part of the fixed route that you deviate is demand responsive. The part you do not is fixed route and paratransit is required.

>> DAWN SWEET: Okay.

>> DAWN SWEET: What requirements exist for a deviation? Would a half mile be enough?

>> JOHN DAY: That's something that's subject to local input, I think. Probably half a mile might be reasonable. You know, it's one of those sorts of things I think you have to -- you know it when you see it.

>> DAWN SWEET: Yeah, and this is a pretty good discussion in the Circular about the service criteria for route deviation. And the recommendation is -- essentially, we want to make sure that it's route deviation in practice, that it's demand responsive, and so you are meeting the requests that you get. And so the Circular suggests that you start, when you are thinking about reasonableness, from the paratransit service criteria and work backwards. So you would know that if you deviate for three-quarters of a mile, the paratransit corridor, that would be reasonable.

But we have seen systems, because of terrain, for example, that deviate a half a mile. What we wouldn't want to see and what we have seen in real limited basis, I should say, would be systems that deviate for everybody for a block or two. You know, not really meeting any demand that may be out there.

Okay. Another question, switching gears a little. Are private taxis part of the demand responsive rules?

>> JOHN DAY: If you are entering into some sort of an arrangement, like a taxi subsidy arrangement, then that service is covered. The taxi subsidy service, the program itself would be covered.

Taxi service, as long as they are out there doing their own thing being taxis, there aren't that many ADA requirements that they have to meet. There's the general nondiscrimination requirements. But unless they purchase something that's not an automobile for use as a taxi, they need not acquire accessible vehicles.

Now, when you enter into a contract or other arrangement with them to provide a taxi subsidy service, then you have to expect that there are going to be people who are going to be eligible for that taxi subsidy service who are going to have disabilities, some of whom may use wheelchairs, and that taxi subsidy service as a whole needs to provide equivalent service to people with and without disabilities.

>> DAWN SWEET: Okay. I think that brings up an interesting point because in the ADA regulations and the DOT ADA regulations, there is a section on taxicabs on private service as well, and while those requirements are in the ADA regulations for DOT, they are actually enforced by the Department of Justice. So it's just a different kind of wrinkle to this.

Alright. Let's see. Here's another question. Our dial-a-ride combines complementary paratransit service for our fixed route with senior transportation. Assume the senior transportation

program would be defined as demand response, but there is an age qualification to use it. Do we need to treat the senior program's transportation under the demand responsive rules?

>> JOHN DAY: And I think the answer to that is probably yes. It's demand responsive service. As we said, there can be eligibility criteria for demand responsive service. It's different from the -- it's not the same as the paratransit eligibility requirements. It can be essentially whatever, you know, you want it to be. So if it's set up as a senior service, it can be operated that way, but it's still demand responsive service, and you still have to be able to accommodate people who qualify for that service who have disabilities, including those who use wheelchairs.

>> DAWN SWEET: Okay. Next question. How do the reasonable modification requirements fit in with the previous question and response regarding route deviation, demand responsive service, and door-to-door accommodations?

>> JOHN DAY: Well, I think in the case of general purpose demand responsive service, a door-to-door requirement might be a fundamental alteration of that type of service. It's not -- as I said, it's different from the requirement for origin-to-destination service, which is unique to paratransit. That's how it's set up, how it's defined, and in order to get someone from their origin to their destination, it may be necessary to provide them service, you know, beyond the curb. With general public demand response service, you can provide curb-to-curb service. There's no expectation of origin-to-destination. And I don't know that it would necessarily be a reasonable modification in that sense to expect door-to-door service. But your mileage may vary.

>> DAWN SWEET: Okay. I think that we've answered -- we'll go through the Q&A box to make sure that we didn't miss anything, but I think that we've hit the major themes here, John.

>> JOHN DAY: Okay.

>> DAWN SWEET: For anyone, again, if we didn't get to your question, if it was overlooked or you want us to dig a little deeper and respond, please submit it to Contact Us, and we will be happy to get back to you promptly.

>> JOHN DAY: Alright. Well, thanks, everyone, for joining us this afternoon or this morning as the case may be wherever you are, and I guess we'll see you next time. (End of session, 1:45 p.m. CT.)

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