

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

Pace Paratransit ADA Paratransit Compliance Review

Final Report
January 2018



U.S. Department of Transportation
Federal Transit Administration

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Executive Summary

Objective and Methodology

This report reviews the Chicago region's complementary paratransit service. It verifies whether Chicago Transit Authority (CTA) and Pace Suburban Bus (Pace) are meeting their obligations under the Americans with Disabilities Act (ADA) requirements to provide paratransit as a complement to fixed route service. Pace operates the combined regional service while the Regional Transportation Authority (RTA) oversees ADA paratransit eligibility.

This compliance review included three stages:

1. Preparation: compilation of information covering policies and procedures and interviews with eligible Pace riders and local disability organizations
2. Site visit: a four-person review team's observation of Pace trip requests, scheduling and dispatching, examination of eligibility applications and related documents (including appeals), and interviews with Pace, RTA, CTA, and contractor employees
3. Analysis and reporting: identification of deficiencies requiring corrective actions and suggestions of effective practices in complementary paratransit service

The Pace complementary paratransit service includes the following positive program elements:

Positive Program Elements

- RTA's eligibility process is comprehensive and thorough
- Pace's operational standards and overall service performance are very high
- Pace's complaint investigation, tracking, and resolution process is comprehensive and thorough

The following administrative deficiencies are easily correctable to bring their program into compliance with 49 CFR Parts 27, 37 and 38:

Administrative Deficiencies

- RTA's letters conveying temporary eligibility do not mention the right to appeal
- Paratransit fares for comparable trips via five free-fare bus routes are not free

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

Substantive Deficiencies

- The number of very early drop-offs for trips with appointment times is high

Please see Section 6 for a discussion of all three deficiencies. The Summary Table of Compliance Review Findings (following Section 6) lists all findings. Unless otherwise noted, RTA, CTA, and Pace must address all deficiencies within 60 days of receipt of this report.

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1 General Information

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

Grant Recipients:	Chicago Transit Authority and Pace Suburban Bus
City/State:	Chicago, Illinois
Grantee Number:	1182 and 5118
Executive Official:	Dorval Carter and Thomas J. Ross
On-site Liaison:	Melinda Metzger
Report Prepared By:	the Collaborative, Inc.
Dates of Site Visit:	May 18–26, 2017
Review Team Members:	Bill Schwartz, the Collaborative, Inc. David Chia, the Collaborative, Inc. Jim Purdy, the Collaborative, Inc. Karla Karash, Karash Associates

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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 Pace Paratransit Service

Since 2006, Pace has operated complementary paratransit service throughout the Chicago region on its own behalf and for CTA. The following narrative, provided as part of the pre-visit information request, explains the RTA Act and Amendments establishing the regional program:

In 1974, the Regional Transportation Authority (RTA) was created upon approval of a referendum in the northeastern Illinois region of Cook, DuPage, Kane, Lake, McHenry and Will counties. The RTA is considered a special purpose unit of local government and a municipal corporation of the State of Illinois. In 1983, the RTA Act was amended with substantial changes made to the RTA's organization, funding and operations. The amended Act created three "Service Boards" known as the Chicago Transit Authority (CTA), Metra Commuter Rail and Pace Suburban Bus. The RTA's primary responsibilities became financial and budget oversight of CTA, Metra and Pace, and regional transit planning issues.

In July 2005, the RTA Act was amended by the Illinois General Assembly. The legislation established that Pace would be responsible for the provision of all ADA Paratransit services on July 1, 2006 and that the RTA would be responsible for the funding, financial review and oversight of all ADA Paratransit services that are provided by the RTA or any of the Service Boards.

In January 2008, the RTA Act was further amended by the Illinois General Assembly. The legislation stipulates that beginning in 2008, the RTA is to provide its Board with a written determination of the projected annual costs of ADA Paratransit services that are required to be provided pursuant to the Americans with Disabilities Act of 1990 and its implementing regulations. Further, the RTA is to conduct triennial financial, compliance, and performance audits of ADA paratransit services to assist in the determination.

4.1 CTA, Pace, and RTA

Chicago Transit Authority

CTA was created in 1945 pursuant to the Metropolitan Transportation Authority Act passed by the Illinois State Legislature. CTA provides bus and rail services in the city of Chicago and 35 adjoining suburban communities. A seven-member board of directors governs the CTA. The mayor of Chicago appoints four members with the advice and consent of the governor and the Chicago City Council. The governor of Illinois appoints the remaining three board members with the advice and consent of the mayor of Chicago and the state senate. The CTA Board hires the CTA president to direct CTA's day-to-day operations.

Pace Suburban Bus

Pace provides fixed route and demand responsive services in 284 municipalities in Cook, Will, DuPage, Kane, Lake, and McHenry counties in northeast Illinois. Its service area is 3,446 square miles. Pace was created in 1983. It has a 13-member board of directors with representatives from the city of Chicago and current and former suburban mayors.

Pace's administrative headquarters is in Arlington Heights, IL. It has 11 suburban divisions and an ADA paratransit office in downtown Chicago.

Regional Transportation Authority

Created in 1974, RTA is a local government special purpose unit and an Illinois municipal corporation serving Cook, DuPage, Kane, Lake, McHenry, and Will counties in northeastern Illinois. A 16-member board of directors governs RTA. The mayor of Chicago appoints five members. The suburban Cook

County board appoints six members (its president appoints one of the six), and the county board chairs of DuPage, Kane, Lake, McHenry, and Will counties each appoint one member. The 15 appointed members elect an RTA board chair. RTA is responsible for overseeing the ADA paratransit eligibility process for the entire Chicago region.

4.2 Pace Paratransit Service

Pace contracts for most complementary paratransit activities, including call taking, scheduling, daily operations, and vehicle maintenance. Pace owns the vehicles used for this service in the Pace suburban service area and the contractors own the majority of vehicles used for service in the Chicago (CTA) service area. Pace sets policies, creates performance standards, accepts, investigates, and resolves complaints, and monitors service. RTA performs eligibility determination (with the exception of service to visitors, which Pace administers) including the eligibility appeal process. CTA remains responsible for monitoring service that Pace provides on its behalf. Both CTA and Pace monitor RTA's eligibility determination process.



For more information on Pace Paratransit services, go to www.pacebus.com

Chicago Service

According to Pace-provided information, four contract carriers provide complementary paratransit service in the city of Chicago. Until July 2016, Pace provided Chicago service using three primary carriers and one supplemental carrier. In July 2016, Pace implemented a new trip distribution system, where the three former zone carriers continue to take next-day demand trip reservations and confirm pickups at the time of the reservation. Throughout the day, a contractor-operated Regional Mobility Management Call Center (RMMCC) redistributes trips among the four carriers to minimize deadhead, increase productivity, and improve customer service. Assigned carriers manage final scheduling/routing. On the day of service, RMMCC facilitators handle “Where’s My Ride?” (WMR) and other day-of-service calls in coordination with the carriers. The RMMCC monitors service performance throughout the day and works proactively with carriers to reassign trips to maintain on-time performance. First Transit (FT) Chicago, the supplemental city carrier, is the designated long-trip provider for trips 15 miles and longer. Additional back-up assistance is available to the RMMCC through a contract with 303 Taxi.

Suburban Service

According to Pace-provided information, in addition to providing complementary paratransit in the Pace Suburban Bus service area, Pace operates a variety of demand-responsive services in coordination with more than 100 local sponsors including townships, counties, and other non-profit agencies. Pace has eight contract carriers for the five “Collar Counties” surrounding Cook County (DuPage, Kane, Lake, McHenry and Will) and the three north, west, and south portions of Suburban Cook County.

Pace’s three suburban Cook County carriers provide turnkey service including reservations, scheduling, dispatch and WMR/day-of-service inquiries. The North Mobility Management Call Center (NMMCC)—managed by Pace’s McHenry County contractor—coordinates reservations, scheduling, trip distribution and WMR/day-of-service inquiries for Lake and McHenry counties. The Chicago-based RMCCC coordinates these same functions for DuPage, Kane, and Will counties. Pickup times are confirmed when the reservation is made. Several taxi companies also provide supplemental service for DuPage and Kane counties, assigned by the RMMCC. Suburban and Chicago ADA paratransit customers may make coordinated transfers at designated transfer locations.

Table 4.1 presents ADA paratransit ridership for 2014–2017. Pace has reported no capacity denials during this period.

Table 4.1 – Pace ADA Paratransit Ridership

Year	ADA Paratransit Trips	Annual Change
2014	3,422,665	—
2015	3,534,711	+3.17%
2016	3,527,232	-0.21%
2017 (2 months)	564,223	-3.32% (2 months)

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

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

- Complaint resolution and compliance information (49 CFR §§ 27.13(b) 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 Mr. Dorval R. Carter, Jr., CTA's President, and Mr. Thomas J. Ross, Pace's Executive Director, on January 31, 2017, confirming the dates for the site visit and asking Pace to send information to the review team in advance of the site visit. See Attachment A.

The review team spoke by telephone with CTA, Pace, and RTA representatives to discuss the information request, and Pace coordinated the response. Prior to the site visit, the review team examined the following service information:

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

As requested by FTA, Pace 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
- Pace's complaint recordkeeping process
- A fleet roster of paratransit vehicles
- A listing of complementary paratransit drivers and their start dates
- Operating budgets, capital spending plans, and cost data

The Pace complementary paratransit service site visit took place from May 18–26, 2017. The visit began with an opening conference, held at 9 a.m. on May 18 at Pace's paratransit operations office at 547 West Jackson Boulevard, Chicago, IL. Attending the conference were:

- Melinda Metzger, Deputy Executive Director, Revenue Services, Pace
- Sally Ann Williams, Division Manager, Pace
- Rosemary Gerty, Manager, Contract Administration, Pace
- C J Mikucki, Senior Operations Analyst, Pace
- Jerald Brooks, Operations Administration, Pace

- Collette Thomas-Gordon, Chief Internal Auditor/EEO Officer, Pace (via telephone)
- Jeff Hulbert, Senior Manager, Regulatory Compliance, CTA
- Amy Serpe, Manager, ADA Compliance, CTA
- Michael VanDekreke, Mobility Services Department Director, RTA
- Anne LeFevre, Manager, ADA Paratransit Certification, RTA
- Allison Noback, Deputy General Counsel, RTA
- Nicholas Sun, Program Manager for Regional Operations, FTA
- Bill Schwartz, Review Team Leader, the Collaborative, Inc.
- David Chia, Review Team Member, the Collaborative, Inc.
- Jim Purdy, Review Team Member, the Collaborative, Inc.
- Karla Karash, Review Team Member, Karash Associates

Following the opening conference, the review team met with CTA, Pace, and RTA representatives to discuss the information sent in advance and Pace's complementary paratransit policies and procedures. Team members also discussed site visit logistics with CTA, Pace, and RTA managers, including contractor and staff interviews and data sources.

During the afternoon, team members visited CTA to discuss its monitoring procedures. Team members also visited Pace's RMMCC to observe call-takers. A team member visited the RTA office to begin the review of the eligibility process.

On May 19, three team members visited the North Cook (Niles) paratransit facility, operated by MV Transportation, one of Pace's contractors for suburban service. One team member visited the DuPage County (Glen Ellyn) paratransit facility, operated by First Transit, another Pace contractor for suburban service. At both facilities, team members interviewed the site manager, training manager, and drivers. Team members also observed schedulers and dispatchers.

On Monday, May 22, two team members visited the South Area paratransit facility, operated by SCR, one of Pace's contractors for Chicago service. They interviewed the site manager, training manager, and drivers. They also observed schedulers and dispatchers. One team member visited the RMMCC (which is adjacent to SCR) to observe call-takers. In the afternoon, he returned to RTA to continue review of the eligibility process. One team member continued interviews, research, and analysis at the paratransit operations office.

On May 23, two team members visited the Central Area paratransit facility, operated by CDT, one of Pace's contractors for Chicago service. They interviewed the site manager, training manager, and drivers. They also observed schedulers and dispatchers. The other team members continued interviews, research, and analysis at the paratransit operations office.

On May 24, two team members visited the North Area paratransit facility, operated by MV Transportation, one of Pace's contractors for Chicago service. They interviewed the site manager, training manager, and drivers. They also observed schedulers and dispatchers. They returned to the paratransit operations office in the afternoon; one of them reviewed no-show/missed trip verification procedures, suspension policies, and visitor eligibility processes. The other team members continued interviews, research, and analysis at the paratransit operations office.

On May 25, one team member visited the paratransit facility operated by First Transit, which provides supplemental paratransit service for Chicago, particularly for trips longer than 15 miles. He interviewed the site manager, training manager, and drivers. He also observed the dispatchers. The other team members continued interviews, research, and analysis at the paratransit operations office.

On May 26, the team returned to the Pace offices to analyze and tabulate the various data. They prepared for the exit conference, which took place at 2 p.m. at the Pace's paratransit operations office. Attending the conference were:

- Melinda Metzger, Deputy Executive Director, Revenue Services, Pace
- Sally Ann Williams, Division Manager, Pace
- Rosemary Gerty, Manager, Contract Administration, Pace
- C J Mikucki, Senior Operations Analyst, Pace
- Karen Tamley, Board of Directors, Pace, and Commissioner, Mayor's Office for People with Disabilities (via telephone)
- Collette Thomas-Gordon, Chief Internal Auditor/EEO Officer, Pace (via telephone)
- Jeff Hulbert, Senior Manager, Regulatory Compliance, CTA
- Amy Serpe, Manager, ADA Compliance, CTA
- Michael VanDekreke, Mobility Services Department Director, RTA
- Anne LeFevre, Manager, ADA Paratransit Certification, RTA
- Nicholas Sun, Program Manager for Regional Operations, FTA
- John Day, Program Manager for Policy and Technical Assistance, FTA (via telephone)
- Bill Schwartz, Review Team Leader, the Collaborative, Inc.
- David Chia, Review Team Member, the Collaborative, Inc.
- Jim Purdy, Review Team Member, the Collaborative, Inc.
- Karla Karash, Review Team Member, Karash Associates

On August 29, 2017, FTA provided Pace with a draft copy of the report for review and response. See Attachment B for Pace's correspondence documenting its response to the draft report.

5.3 Stakeholder Interviews

Before the site visit, the review team interviewed eight complementary paratransit riders and one representative of an agency that works with paratransit riders. The following is a summary of comments the review team received:

Eligibility. One rider said that the wording of certain questions on the paper application was unclear. The agency representative said there had been occasional delays in getting interviews for her clients.

Telephone access. Three riders cited poor or unprofessional manners of call-takers. Two riders cited particularly long hold times in the late afternoon. Three riders said that they had occasionally been on hold for more than 10 minutes. Three riders said that hold times were better in the morning. One rider said that hold times were better when requesting rides with the suburban carriers. Two riders said that telephone hold times improved in 2017.

Denials. No interviewees were aware of wait lists or trip denials. Most riders said there was some negotiation on the requested trip time, but usually within 10 minutes of the request. Three riders noted that Pace eliminated the option for will-call return trips.

On-time performance. Four riders said that on-time performance was good or improving. Two riders were unhappy with pickup performance (late "quite a bit," "very bad"). Two riders said their pickups were usually on time, but can be very late. One rider said that her subscription trips were usually on time, but other trips were less reliable.

Travel times. Three riders mentioned long trips. One Chicago rider believed that CDT trips are faster, while SCR and First Transit trip are less direct.

Drivers. Riders were mostly complimentary about drivers. Several riders said that the older drivers are more courteous and knowledgeable. One Chicago rider believed that CDT and MV Transportation drivers are more courteous. Drivers often provide extra service on request, such as carrying bags. One rider mentioned that some drivers do not know the proper way to secure her oversize wheelchair.

Resolving Complaints. Riders mostly said that Pace responded to comments within two weeks. However, most riders did not find the responses specific or useful. One rider said that she had received “standard replies” with no details, so she stopped calling to complain.

Other Comments. Two riders complimented the quality and cleanliness of SCR vehicles. Two riders said that CDT vehicles are not clean.

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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 Pace complementary paratransit service is provided, with corrective actions and a timetable to correct deficiencies for each of the requirements and sub-requirements where necessary.

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

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

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

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

6.1 Comparable Complementary Paratransit Service

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

Discussion: During this compliance review, no deficiencies were found with the requirement for CTA and Pace to provide comparable paratransit service. Pace operates complementary paratransit that serves ADA paratransit eligible individuals.

6.2 ADA Paratransit Eligibility Process

RTA is responsible for administering the ADA paratransit eligibility process for all Pace Paratransit riders, including unconditional, conditional, and temporary eligibility. Pace manages the process for providing service to visitors.

Absence of Administrative Burdens

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

Discussion: During this compliance review, no deficiencies were found with the prohibition against unreasonable administrative burdens in the ADA paratransit eligibility process. RTA manages this process for CTA and Pace.

Since the mid-1990s, RTA has conducted ADA paratransit eligibility determinations for individuals who want to use ADA paratransit service. RTA’s main administrative office is in downtown Chicago, 175 West Jackson Boulevard. As of late 2016, RTA has contracted MTM, Inc. to conduct interviews and in-person assessments and recommend eligibility determinations.

All first-time applicants have in-person interviews and assessments. Most recertifying riders also have in-person interviews and assessments. RTA's two satellite offices where interviews and in-person assessments take place are on the south side of Chicago and on the northwest side of Chicago. There is no application fee and Pace provides free paratransit trips to the interview/assessment sites upon request.

Paratransit Eligibility Standards

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

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

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

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

Discussion: During this compliance review, no deficiencies were found with the RTA-managed process to determine if individuals are ADA paratransit eligible.

RTA uses a written application, in-person interview and functional assessment in order to make eligibility decision. In addition, the RTA may request additional information from a medical professional if needed to make an eligibility determination. As of April 2017, RTA had 66,623 individuals certified as ADA paratransit eligible. Between April 1, 2016 to April 30, 2017, RTA received 18,880 applications.

All new applicants for service call RTA to receive a paper application (also available in alternative formats). The application (see Attachment C) consists of the following sections:

- I. General information
- II. Disability and mobility equipment
- III. Abilities to use fixed route buses or "L" trains
- IV. Functional abilities
- V. Current travel
- VI. Signature

The end of the application includes a place for a medical professional's contact information, should RTA require additional information.

After completing as much of the form as possible, an applicant contacts RTA to arrange an in-person interview and functional assessment at one of the two contractor (MTM)-operated assessment sites. At the interview, an MTM eligibility evaluator reviews the completed application with the applicant and decides if a 30–45 minute functional assessment is needed to assess the applicant's travel abilities. The evaluator may subsequently contact the applicant's designated medical professional for additional information.

Once all information is obtained, the MTM evaluator recommends a determination, which an MTM manager reviews before forwarding it to RTA. At the time of the site visit, RTA was reviewing all recommendations, but planned to change its 100 percent review process as follows. If determined:

- Not eligible: review 100 percent
- Conditionally eligible: review 50 percent, decreasing eventually to 25 percent

- Unconditionally or temporarily eligible: review 25 percent, decreasing eventually to 10 percent

As appropriate, RTA requests further information from MTM to justify a recommended determination or it may recommend modifying the determination. At the time of the site visit, RTA estimated that it disagreed with less than five percent of MTM's recommendations and in most cases, areas of disagreement included documentation, paperwork, or other administrative issues rather than the actual recommendation. RTA makes one of the following eligibility determinations:

- Unconditional: rider may use Pace Paratransit for all trips
- Conditional: rider may use Pace Paratransit for some trips
- Temporary: rider may use Pace Paratransit for a limited time (set at three, six, nine, or 12 months). All temporary eligibility determinations are unconditional
- Not eligible

RTA makes determinations of conditional eligibility with a range of possible conditions. However, Pace does not enforce these conditions when providing service to conditionally eligible riders.

Table 6.1 presents the distribution of determinations for April 1, 2016 to April 30, 2017.

Table 6.1 – RTA Eligibility Determinations, April 1, 2016–April 30, 2017

Category	Number	Percent
Unconditional	14,329	75.9
Conditional	2,715	14.4
Temporary	1,649	8.7
Not eligible	187	1.0
Total	18,880	100.0

To assess RTA's eligibility determination process, the review team examined a sample of 25 eligibility determination files. These included five determinations of unconditional eligibility, five conditional eligibility determinations, and 15 eligibility denials.

All determinations were reasonable. Of the 15 denials, 13 of the applicants were using fixed route service; the supporting documentation and evaluator notes for these 15 denials often acknowledged some physical or cognitive disability but asserted the applicants were able to use fixed route service. For the five conditionally eligible applicant files, the eligibility conditions were appropriate.

Accessible Information

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

Discussion: During this compliance review, no deficiencies were found with this requirement to have information in accessible formats. Advisory comments are made about Pace and CTA informing its riders on the availability of paratransit information on CTA's website and in other accessible formats.

RTA's ADA paratransit application states, "call if you need this application in large print, Braille, on audio tape or audio CD, or in Spanish." The RTA website (<http://rtachicago.org/rider-resources/accessible-transit/paratransit-certification>) states that at the interview, "we will provide... the services of an American Sign Language or Spanish interpreter at no charge." RTA has an internal document that lists the information it makes available in accessible formats.

Pace's printed paratransit Customer Guides (see Attachment D) refer to availability of information in accessible formats. However, neither the Pace or CTA website provides instructions on how to obtain information in accessible formats. In addition, at the time of the site visit, CTA's website did not provide

any information on paratransit or a link to the Pace Paratransit website landing page (http://www.pacebus.com/sub/paratransit/sd_ada-paratransit.asp).

Advisory Comments: It is an effective practice to widely promote the availability of information in accessible formats, particularly on agency websites. It is also an effective practice for CTA to provide a link to the Pace Paratransit website.

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, no deficiencies were found with the requirement for RTA to communicate an applicant’s right to presumptive eligibility for Pace Paratransit.

The RTA website (<http://rtachicago.org/rider-resources/accessible-transit/paratransit-certification>) states:

“A decision will be made on your application within 21 days of the completion of the interview and assessment. If a decision is not made within 21 days, we will provide you with ADA Paratransit service until a final decision is made. You will be notified of your eligibility by letter...”

According to RTA managers, the 21-day clock begins after the in-person interview and assessment — or later, if RTA is waiting for information from a medical professional.

The review team looked at key dates of eligibility determinations RTA made in March and April 2017: “application complete” and “eligibility date.” The difference between these two dates is the processing time. Based on nearly 3,000 determinations made during these two months:

- Mean time to make determination: seven days
- Median time to make determination: six days

Based on this sample, less than one percent of the applications required more than 21 days for a determination.

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, a deficiency was found with the letter that RTA sends to applicants who have been determined temporarily eligible. This letter does not inform the applicant of the right to appeal this decision.

RTA's determination letter is the official documentation of eligibility. RTA provides an identification card to individuals who receive some level of eligibility, but this is not the official document. All letters include the following 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)

RTA's letters granting conditional eligibility or denying eligibility explain the applicant's right to appeal the decision. However, the letters that grant temporary eligibility do not include information about the applicant's right to appeal the decision. Since temporary eligibility is a limited form of eligibility, FTA requires that applicants receiving this determination have the right to appeal, and transit agencies must inform them of this right.

Corrective Actions and Schedule: Within 60 days of the issuance of the final report, RTA must revise its temporary eligibility letters to inform applicants they may appeal RTA's decision.

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 RTA's process for recertifying ADA paratransit eligibility.

An individual who has unconditional or conditional eligibility receives a term of four years. Two months prior to the end of a rider's eligibility period, RTA mails a paper application and instructions to the rider. Most recertifying individuals must complete the application and have an in-person interview.

In 2015, RTA began to let certain individuals reapply with shorter applications and without in-person interviews by omitting two sections included in the initial application: "Abilities to use fixed route buses or 'L' trains" and "Please give us more information about your functional abilities." To qualify for mail-in recertifications, riders must meet at least one of these criteria:

1. Be at least 75 years old in the year of the current application
2. Have been found unconditionally eligible for two consecutive certifications
3. Have a severe or profound cognitive or intellectual disability
4. Have a severe physical disability with complex medical needs requiring constant monitoring and frequent intervention
5. In cases where a combination of factors exist, including diagnosis, prognosis, mobility aid and lack of independent mobility such that the possibility for independent mobility in the future is extremely unlikely

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

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

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

Discussion: During this compliance review, no deficiencies were found with the process or documents RTA uses for eligibility applicants to appeal eligibility.

Individuals who receive conditional eligibility or who are denied eligibility may appeal the determination. Those wishing to appeal the decision must request an appeal in writing with 60 days of the initial determination. They do not need to state a reason.

After RTA receives the written request, it performs an administrative review of the determination. Based on this review, RTA may revise the determination and/or request an additional assessment. However, in most cases, the administrative review process does not identify any errors or omissions. In cases where revisions are made, RTA will notify the appellant of any revision to the initial determination following the administrative review. The appellant may accept this new determination or proceed with a formal appeal.

The eligibility review board has three members:

- RTA mobility manager who was not involved in the initial determination
- Community member with a disability or staff from an agency that works with persons with disabilities
- Representative of (Chicago) Mayor’s Office of Persons with Disabilities

Upon request, RTA will arrange for Pace to provide paratransit service to the hearing. At the appellant’s request, the hearing may take place via conference call. Whether in person or via conference call, appellants can offer further documentation and/or invite others to speak on their behalf. The appellant may also choose not to participate in the hearing. The review board makes a decision within 30 days after the hearing. RTA provides the decision in writing (or other requested accessible format). Upon request, RTA also provides an audio recording of the appeal hearing.

For the 13-month period, April 1 2016 to April 30, 2017, RTA had 32 appeals. Table 6.2 presents the outcomes of these appeals.

Table 6.2 – RTA Eligibility Appeal Outcomes, April 1, 2016–April 30, 2017

Category	Number	Percent
Original determination upheld	11	34.4
Determination changed	15	46.9
Appeal withdrawn	5	15.6
Referred for additional assessment by appeal board	1	3.1
Total	32	100.0

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 review, no deficiencies were found with Pace's process to provide complementary paratransit service to visitors to its service area. An advisory comment is made regarding Pace's turnaround time for granting visitor requests

Pace administers service to visitors (not RTA). According to the Pace Customer Guide (Page 17):

Pace will provide ADA Paratransit Service for visitors with disabilities who reside outside the six-county RTA service area. Out-of-town visitors should request eligibility for Pace ADA Paratransit Service at least 7 days before the first desired day of travel.

- Visitors who already have ADA paratransit eligibility from another transit agency need to contact Pace and provide proof of eligibility, such as a valid ADA Paratransit ID card or a letter from the transit agency that certified the person's ADA paratransit eligibility.
- Visitors who do not have ADA paratransit eligibility with another transit agency must provide documentation of place of residence (such as a driver's license or state ID card) and a statement that they have a disability and are unable to use fixed route service. Additional documentation may be required if the disability is not apparent.

While Pace requests at least seven days advance notice, Pace processes visitor requests for service within two business days. In 2016, 219 individuals requested service from Pace as visitors.

Appendix D to 49 CFR 37.127 states that "each entity having a complementary paratransit system to provide service to visitors from out of town on the same basis as it is provided to local residents. By 'on the same basis,' we mean under all the same conditions, service criteria, etc., without distinction." For this reason, FTA expects granting visitor eligibility to be a fairly simple and quick process enabling individuals to contact the host agency to learn what is required, and that upon receipt of any required documentation, transit agencies would quickly act to permit visitors to place trip requests. FTA envisions this as a process that can often be completed the same day or no more than one day later

Advisory Comment: It is an effective practice for transit agencies to have procedures in place to process all visitor requests within the same day or not more than one day later.

6.3 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 review, no deficiencies were found with Pace's policies or procedures to provide complementary paratransit service on an origin-to-destination-basis.

Pages 7–8 of the Customer Guide sets forth Pace's policies and procedures for the level of driver assistance:

Customers should request assistance when they make their reservation. However, customers also may also request assistance at the time of pick-up and or drop-off. Drivers will assist customers

with boarding and exiting the vehicle, and to/from the ground-level exterior door of the building. Drivers will provide assistance up/down two steps to/from a building if it is safe to do so. Drivers are required to make sure that all wheelchairs and scooters are properly secured per Pace requirements. Drivers are not allowed to lift or carry customers.

Drivers cannot escort customers past the ground floor of any building and are not allowed to enter residences. They are required to maintain a visual sight line of their vehicle at all times. Customers are expected to carry their own bags and packages. Customers are responsible for ensuring that the path of travel between their exterior door and the vehicle pick-up/drop-off area are clear of snow and other obstacles.

Pace's policy is to make "live" handoffs at transfers between Pace Paratransit vehicles: the first driver waits for the second driver to arrive at the transfer point. The exception to this policy is a rider's consent to being left unattended—usually at shopping malls or other indoor locations.

Rider interviews indicated an uneven level of driver assistance. However, in review team interviews, drivers appeared to understand Pace's policies and procedures.

6.4 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 Pace'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 Pace's paratransit service area.

Pace's paratransit service area includes the entire city of Chicago, plus a 3/4 mile radius around local CTA and Pace bus routes and CTA rail stations beyond the city. When a call-taker enters a requested pickup or drop-off address, Pace's paratransit software displays a map showing whether the address is within the service area. Pace regularly updates its software with any bus route changes.

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 Pace's response time.

Pace accepts trip requests one day ahead of the travel day and accepts same-day requests on a limited basis. Riders may call seven days a week, 6 a.m. to 6 p.m. For early morning trips (e.g., after Midnight), riders may call until 6 p.m. on the prior day.

Pace's policy and practice is to always offer pickup times within 60 minutes of the requested time. When riders cannot leave before a certain time, Pace negotiates only 60 minutes after the requested time. Pace does not subsequently change pickup times after call-takers confirm them with riders. When riders request specific drop-off times (appointments), Pace offers pickup times to ensure on-time arrivals before the appointments.

Review team observations of the trip reservations process confirmed that when riders requested pickups, Pace offered a time within 60 minutes of the requested time, usually within 10 minutes. Team members also observed trip requests with appointment times in which the offered trip would ensure arrival before the requested arrival time.

Fares

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

Discussion: During this compliance review, deficiencies were found in Pace's complementary paratransit fare policy with respect to a limited number of fare-subsidized bus routes.

CTA and Pace service cash fares are:

- \$2.25: CTA bus and train
- \$2.00: most Pace bus routes
- \$0.25: transfers, CTA and Pace

The fare for most Pace Paratransit trips is \$3. In some suburban counties, if a rider is transferring from demand-responsive service to ADA paratransit service and the demand-responsive fare is lower than \$3, the rider pays only that lower fare for the entire one-way trip.

However, Pace operates five local routes with a free fare:

- Niles Township Courtesy Bus (routes #410, 411, and #412)
- Rosemont Entertainment Circulator (route #811)
- Schaumburg's Woodfield Trolley (route #905)

In each of these instances, another entity is reimbursing Pace for the fares; riders do not pay any fare. Riders taking comparable paratransit trips are still charged a fare, and Pace has not negotiated comparable paratransit fare arrangements with the reimbursing entities.

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

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

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

Accordingly, the fare must also be free for paratransit trips where typical fixed route users would use these four routes for comparable trips.

Corrective Actions and Schedule: Within 60 days of the issuance of the final report, Pace must ensure that fares for comparable ADA paratransit trips are no more than twice the fixed route fare, which means some paratransit trips within 3/4-mile of free-fare routes #410, #411, #412, #805, and #905 must also be free. Accordingly, Pace should establish a fare-comparability zone around these routes. This could be funded through renegotiating the terms of the free-fare arrangements with other entities to include reimbursement for comparable paratransit trip fares taken within the free-fare zones, or an alternative local solution.

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. Neither Pace's Customer Guides nor its website discuss trip purposes. In addition, review team members did not observe call-takers restricting or prioritizing trip requests based on the trip purpose.

Hours and Days of Service

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

weekdays but not necessarily on weekends; an area that has bus service from 5 a.m. until 9 p.m. must have complementary paratransit service, at minimum, from 5 a.m. until 9 p.m.

Discussion: During this compliance review, no deficiencies were found with the availability of paratransit service during all hours that Pace and CTA operate fixed route service.

Pace provides paratransit within its Chicago service area 24 hours per day, seven days a week.

In the suburban service area, Pace provides paratransit during hours and days that mirror the service hours of its bus routes. For example, if a portion of the service area has fixed route bus service from 5 a.m. to 8 p.m. on weekdays, that area receives paratransit service during those same hours and days.

Absence of Capacity Constraints

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

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

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

Discussion: During this compliance review, no deficiencies were found with the prohibition against restricting the number of trips for ADA paratransit eligible riders. Pace does not limit the number of trips provided to paratransit riders.

No Waiting List for Access to the Service

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

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

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

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

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

Discussion: During this compliance review, no deficiencies were found with this requirement. Pace's on-time performance is very good. Pace applies strict on-time performance standards to both its Chicago and suburban contractors as discussed below.

Chicago Service

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.

Pace defines an on-time trip as one that takes place within 20 minutes after the scheduled time (-0/+20), and requires contractors to be on time at least 95 percent of the time. Using Pace's paratransit software data, the review team independently analyzed nearly 51,000 trips during a sample week (March 19–25, 2017).

Table 6.3 shows an overall on-time performance rate of 93.6 percent, including 48.3 percent of pickups occurring before the pickup time. Among the four Chicago contractors, performance that week ranged between 89.9 and 95.5 percent. Given Pace's 20-minute Chicago pickup window, this reflects very good on-time performance. The review also examined the distribution of early pickups and found approximately 79 percent occurred between one and 15 minutes early. Pace's policy prohibits drivers from appearing at a pickup address more than ten minutes before a rider's scheduled pickup time. The five-minute boarding window Pace affords to riders does not begin until the scheduled pickup time; riders may board earlier but are not required to do so.

Table 6.3 – On-Time Performance for 50,800 Pace Chicago Paratransit Trips: March 19–25, 2017

Trips	All Trips		Contractor Percentages			
	Number	Percent	CDT	SCR	MV	First
Early	24,516	48.3%	49.8%	48.7%	49.2%	38.0%
In window (-0/+20)	23,035	45.3%	42.6%	46.8%	45.3%	51.8%
Early or in Window	47,551	93.6%	92.4%	95.5%	94.5%	89.9%
All late	3,249	6.4%	7.6%	4.5%	5.5%	10.1%
1–15 minutes late	2,479	4.9%	5.9%	3.7%	4.0%	6.6%
16–30 minutes late	592	1.2%	1.4%	0.7%	1.2%	2.3%
>30 minutes late	178	0.4%	0.3%	0.1%	0.4%	1.2%

Suburban Service

For its suburban service, Pace defines an on-time trip as one that takes place within 15 minutes after the scheduled time (-0/+15), and requires contractors to be on time at least 95 percent of the time. Using Pace's paratransit software data, the review team independently analyzed approximately 16,000 trips during a sample week (March 19–25, 2017).

Table 6.4 shows an overall on-time performance rate of 94.0 percent, including 55.3 percent of pickups occurring before the pickup time. Information for individual contractor performance was not readily available. Given Pace's 15-minute suburban pickup window, this reflects very good on-time performance. The review also examined the distribution of early pickups and found approximately 78 percent occurred between one and 15 minutes early. As with its Chicago contractors, Pace's policy prohibits drivers from appearing at a pickup address more than ten minutes before a rider's scheduled pickup time. The five-minute boarding window Pace affords to riders does not begin until the scheduled pickup time; riders may board earlier but are not required to do so.

Table 6.4 – On-Time Performance for 16,155 Pace Suburban Paratransit Trips: March 19–25, 2017

Trips	Number	Percent
Early	8,931	55.3%
In window (-0/+15)	6,248	38.7%
Early or in Window	15,179	94.0%
All late	976	6.0%
1–15 minutes late	665	4.1%
16–30 minutes late	154	1.0%
>30 minutes late	157	1.0%

No Substantial Numbers of Trip Denials or Missed Trips

Requirements: Under 49 CFR § 37.131(f)(3)(i)(b), transit agencies must provide complementary paratransit service without substantial numbers of trip denials or transit agency missed trips. A denial

occurs whenever a transit agency is unable to provide a trip on a next-day basis as requested by an eligible passenger between points within the complementary paratransit service area, at a time when the fixed route system is operating, subject to the limitations on trip time negotiation. Under 49 CFR § 37.131(b), transit agencies may negotiate pickup times with a passenger, but cannot require the passenger to schedule a trip to begin more than one hour before or after his or her desired departure time. If the trip cannot be arranged within this timeframe, a denial has occurred whether or not the passenger accepts a departure time of more than one hour earlier or later. In addition, when a denied trip makes a subsequent requested trip impossible, as could occur in the case of an individual taking a round trip to and from a specific location, two trips have been denied.

Discussion: During this compliance review, no deficiencies were found with the number or tracking of trip denials or missed trips. Pace has a zero denial policy and requires contractors to report any trips in which its contractors do “not offer a new time to the client within the usable hour.” Pace has not had any denials for the past three years. Pace also tracks refusals (“adversarial denials”) and “eligibility denials” (trips that Pace does not have to provide based on service area, day/time, or are otherwise not an ADA paratransit trip.) The review team did not observe any denials during their observations of call-takers.

Pace defines a missed trip as a scheduled trip in which:

- The contractor does not pick up the rider, excepting rider cancellations or no-shows
- The pickup occurs more than 60 minutes after the scheduled pickup time
- The contractor arrives beyond the pickup window and no pickup takes place

See Section 6.10 for a discussion of Pace’s oversight of contractor-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, no deficiencies were found with Pace’s definition of long trips or with the number of long trips.

Pace’s service standard and requirement for trip length applies to all contractors for Chicago and suburban service.

Standard: Rider travel time shall be comparable to or less than the travel time for the same trip on fixed-route buses, including walk time and all bus transfers associated with the trip. The Contractor shall use the RTA Trip Planner at www.goroo.com to determine if their travel times are equal to or less than the fixed-route travel time. This standard shall not apply when verifiable circumstances exist beyond the Contractor’s control, such as inclement weather, unusually heavy traffic, etc.

Requirement: Contractor shall comply with FTA requirements regarding rider travel time. For trips provided where the rider travel time exceeds comparable travel time for fixed-route service, the Contractor shall provide a written explanation for the additional travel time, upon Pace request.

The review team analyzed long trips from the sample week, first for their overall distribution of travel times, and then for each contractor. Approximately 16 percent of all trips were longer than 60 minutes, with 4.1 percent longer than 90 minutes, and 0.8 percent longer than 120 minutes. These proportions were

similar for both Chicago and suburban trips. For the Chicago contractors, the proportion of trips longer than 60 minutes ranged from 12.7 percent (SCR) to 34.7 percent (First Transit). The high proportion of trips longer than 60 minutes for First Transit is not surprising since First Transit is the designated long-trip provider for trips 15 miles or longer.

Second, the review team selected 31 long trips from the same sample week that exceeded 90 minutes, and compared the respective travel times to the times for comparable trips via fixed route service. The travel times for comparable trips were based on RTA's online trip planner. Of these 31 long paratransit trips, 13 trips (42 percent) were more than 30 minutes longer than their comparable fixed route trips. Combining this sample with the Pace average of 4.1 percent of trips exceeding 90 minutes, an estimated 1.7 percent of all Pace trips were excessively long. This is not a substantial number of long trips.

Every three months, Pace regularly compares paratransit and fixed route travel times by selecting a sample of 20 of its top 100 riders (in terms of frequency). Pace reviews all trips (regardless of travel time) the 20 riders took the prior quarter. For Q1 2017, this analysis comprised 4,810 trips and showed that 4.4 percent (210) of these trips had excessively long travel times.

Furthermore, Pace investigates all rider complaints related to trip length by compiling a detailed record of a complainant's trips and compares travel times and on-time performance. If Pace identifies a pattern or practice of long trips for that rider or from its quarterly analysis, it directs its contractor to improve performance for the rider's future trips. See Section 6.7 for a discussion of the complaint process and Section 6.10 for a discussion of how Pace monitors contractor trips.

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, no deficiencies were found with Pace's telephone performance. An advisory comment is offered on inconsistent hold time standards among Pace contractors.

As discussed in Section 4.2, Pace has established two regional call centers for some customer calls; its individual service providers handle other customer calls. Pace's standards for telephone hold times are shown in Table 6.5.

Table 6.5 – Telephone Hold Time Standards

Service Area	No. Rings	Standard	Max Hold Time
Chicago	3	75% calls on hold < 150 sec	N/A
DuPage, Kane, Will Counties (RMMCC)	3	75% calls on hold < 75 sec 95% calls on hold < 90 sec	120 seconds
Suburban Cook County	3	75% calls on hold < 150 sec	N/A
Lake, McHenry Counties (NMMCC)	3	75% calls on hold < 75 sec 95% calls on hold < 90 sec	120 seconds

According to Pace, the different standards reflect contracts being negotiated at different times.

The regional call centers (RMMCC and NMMCC) have sufficient capacity, including hardware and incoming lines, to avoid busy signals at peak call times. The telephone performance reports break out hold times on an hourly basis and present performance in line with Pace standards.

The review team analyzed telephone performance for the March sample week. Overall, 97 percent of calls were on hold for fewer than 180 seconds (three minutes); 98.9 percent of calls were on hold for fewer than 300 seconds (five minutes). The review team also analyzed telephone performance on an hourly basis. All contractors had occasional hours in which the percent of calls with hold times exceeding 90 seconds was greater than Pace’s standard. These hours tended to be at the end of the day (4-6 p.m.) on weekdays, or the beginning of the day (8-9 a.m.).

Riders the review team contacted raised a concern that hold times were longer at the end of the day, particularly 4-5 pm. The data indicates that telephone hold time performance improved during this sample week when compared to data Pace reports for earlier in 2017.

Advisory Comment: It is an effective practice to apply uniform hold time standards for all service areas and contractors. With uniform standards, all riders may expect the same level of telephone service and Pace will have the same expectations for all contractors.

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, a deficiency was found with Pace’s on-time drop-off performance with respect to the number of very early drop-offs. An advisory comment is made concerning the measurement of on-time performance. Pace applies strict on-time performance standards to both its Chicago and suburban contractors as discussed below.

Chicago Service

According to Pace’s contracts, “dropping off a rider on-time for their appointment shall be defined as dropping the rider off at their destination on or before the recorded appointment time.” Pace requires its contractors to achieve on-time performance equaling or exceeding 95 percent of the drop-off appointment times. Using Pace’s paratransit software data, the review team independently analyzed nearly 16,000 trips with appointment times during the March sample week.

Table 6.6 shows an overall on-time drop-off performance rate of 91.8 percent, which is below Pace’s 95 percent on-time standard, but alone does not represent a substantial number of untimely drop-offs. However, Table 6.6 also shows 62.5 percent of drop-offs were more than 30 minutes early; 14.7 percent of drop-offs were more than 60 minutes early. This represents a high number of very early drop-offs and is a potential capacity constraint that could act to discourage use of the system. FTA encourages policies to drop off riders no more than 30 minutes before appointment times.

Table 6.6 – Drop-off Performance for 15,827 Pace Chicago Paratransit Trips: March 19–25, 2017

	All Trips		Contractor Percentages			
	Number	Percent	CDT	SCR	MV	First
Trips	15,827	100%	5,868	6,388	1,916	1,655
All late	1,292	8.2%	8.6%	5.5%	9.6%	15.5%
1–15 minutes late	154	1.0%	0.9%	0.4%	1.3%	3.1%
16–30 minutes late	312	2.0%	2.1%	1.3%	2.1%	3.9%
>30 minutes late	826	5.2%	5.5%	3.8%	6.2%	8.5%
All on-time/early	14,535	91.8%	91.4%	94.5%	90.4%	84.5%
1–15 minutes early	1,773	11.2%	11.3%	10.2%	11.5%	14.4%
16–30 minutes early	2,877	18.2%	18.8%	16.7%	18.9%	21.0%

31–60 minutes early	7,552	47.7%	47.0%	51.5%	13.0%	12.5%
>60 minutes early	2,333	14.7%	14.4%	16.1%	13.0%	12.5%
All >30 minutes early	9,885	62.5%	61.4%	67.6%	60.0%	49.1%

Suburban Service

For its suburban service, Pace defines on-time drop-offs the same way as for its Chicago service, but requires its contractors to achieve on-time performance equaling or exceeding 90 percent.

Using Pace’s paratransit software data, the review team independently analyzed nearly 3,900 trips with appointment times during the March sample week. Table 6.7 shows an overall on-time drop-off performance rate of 90.0 percent, which matches Pace’s 90 percent on-time standard. Individual contractor on-time performance statistics for suburban contractors was not readily available. The table also shows 42.4 percent of drop-offs were more than 30 minutes early, 5.8 percent of drop-offs were more than 60 minutes early. While this represents a lower number of very early drop-offs as the Chicago service, it also represents a high number of very early drop-offs, a potential capacity constraint.

Table 6.7 – Drop-off Performance for 3,866 Pace Suburban Paratransit Trips: March 19–25, 2017

Trips	All Trips	
	Number	Percent
All late	387	10.0%
1–15 minutes late	258	6.7%
16–30 minutes late	83	2.1%
>30 minutes late	46	1.2%
All on-time/early	3,479	90.0%
1–15 minutes early	747	19.3%
16–30 minutes early	1,056	27.3%
31–60 minutes early	1,415	36.6%
>60 minutes early	223	5.8%
All >30 minutes early	1,638	42.4%

In order to ensure on-time drop-offs for trips with appointment times, during the reservations process, call takers consult printed tables with predetermined time allowances. These allowances account for the Chicago region’s conditions, and according to Pace are comparable to fixed route travel times. However, as a 24-hour service, some trips occur during times of less congestion and/or are point-to-point trips. For some trips at less congested times and/or without any intervening pickups or drop-offs, travel times can be much shorter, potentially leading to very early drop-offs.

Corrective Actions and Schedule: Within 60 days of the issuance of the final report, Pace must submit a plan to reduce the number of very early drop-offs in both Chicago and for suburban service.

Advisory Comment: Pace regularly monitors arrival on-time performance for appointments for both very early and late arrivals; however, no standard has been established for very early drop-offs. It is an effective practice for Pace to consider revising its performance measures to establish a standard for very early drop-offs. In so doing, Pace may wish to examine fixed route headways to determine how far in advance of a scheduled appointment a rider would have to arrive using the comparable fixed route system in certain corridors where infrequent fixed route service may be a factor.

6.5 Subscription Service

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

Discussion: During this compliance review, no deficiencies were found with how Pace provides subscription service as part of its ADA paratransit service.

According to Page 13, of its Customer Guide, Pace offers subscription service for repeated trips (same day of week, same time, same origin and destination) that occur at least twice per week. The proportion of subscription trips by service area ranges from 20 to 40 percent of total trip requests in the respective service areas. Depending on operational considerations, Pace may place requests for subscription service on a waiting list.

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

Requirements: Section 37.125(h) of the DOT ADA regulations states that transit agencies “may establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit service to ADA eligible individuals who establish a pattern or practice of missing scheduled trips.” FTA has permitted transit 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, no deficiencies were found with Pace’s policies and processes for no-show suspensions. No deficiencies were found with Pace’s no-show verification process.

Pace may suspend a rider’s paratransit service if the rider accumulates no-shows, cancels at door, or cancels late (which Pace tallies as one-half of one no-show) at the following rate in a calendar month:

- No shows/late cancellations represent 10 percent or more of the rider’s scheduled trips and
- Rider has three or more no shows

Each month, for up to 100 new (i.e., not repeat) violators who meet these two criteria, Pace sends a first warning letter. Before sending this letter—or taking any subsequent action—Pace verifies each recorded no-show, late cancellation, and door cancellation. This means that time data and dispatcher notes must demonstrate that the driver arrived at the correct location on time (in or before the pickup window), and waited at least five minutes within the pickup window. Pace will also remove a recorded no-show or late cancellation if there is evidence of a contractor error or circumstances beyond the rider’s control, e.g., medical appointment runs later than anticipated, or a rider is unable to cancel an early morning pickup two hours in advance due to a power outage.

Pace takes the following progressive actions for repeated instances of violating the no-show policy:

1. First violation: Pace issues a warning letter advising the rider that he/she has violated Pace’s no-show/late cancellation policy
2. Second violation within a 30-day period: Pace issues a second warning letter
3. Third violation within a 30-day period: rider receives a 7-day suspension
4. Fourth violation within a 30-day period: rider receives a 14-day suspension

5. Fifth and subsequent violations: rider receives a 30-day suspension

Pace informs the rider of a potential service suspension (stages 3, 4, or 5). A rider may appeal any potential suspension. The no-show suspension appeal hearing process is separate from the process for eligibility appeals.

A rider can request details on individual recorded no-shows, late cancellations, and cancels at the door. Pace's general counsel or another Pace attorney presides at no-show suspension hearings. A member of Pace customer service team presents the information supporting the proposed suspension. The rider may appear in person, or submit written documentation. The rider may dispute the information and/or explain why any recorded no-shows were not within the rider's control.

For a period of nearly eight months (October 2016–May 25, 2017), Pace issued 100 suspensions due to excessive no-shows and late cancellations: 28 suspensions for seven days; 24 suspensions for 14 days; and 48 suspensions for 30 days.

6.7 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.

Discussion: During this compliance review, no deficiencies were found with the requirements related to complaint resolution and compliance. Pace has thorough procedures to promptly and equitably resolve complaints. Pace's Quality Assurance (QA) department manages the complaint process, with full contact information properly advertised in the Customer Guide and on the Pace website.

Pace uses a complaint tracking database as well as its paratransit software to record and investigate complaints. Pace records all complaints received via telephone, mail, or via the Pace website in the database and initiates the investigation. If it can resolve the complaint directly, QA staff record the resolution in the paratransit software (if appropriate) and in the tracking database. If needed, Pace forwards the complaint to the appropriate contractor for investigation and response. Pace requires its contractors to initiate appropriate retraining or disciplinary action as appropriate. Pace promptly communicates the resolution to the complainant and records this information in the database. Detailed complaint records extend back more than five years.

The review team examined the complaint database, interviewed QA department staff, and reviewed individual complaint investigations. This included contractor correspondence requiring corrective actions and customer assistance forms for individual complaints. The process is thorough and comprehensive.

6.8 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, no deficiencies were found with any Pace policy that may deny an individual with a disability the opportunity to use the transportation services it provides to the general public.

Pace policies have no improper prohibitions on specific wheelchairs and Pace does not require riders to use seatbelts. There are no conditions for which Pace requires a rider to be accompanied by PCA. Other policies (including fare discounts) apply to both paratransit and fixed route service.

6.9 Training Requirements

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

Discussion: During this compliance review, no deficiencies were found with training for Pace's employees or with its contractors.

Pace employees appeared to fully understand their responsibilities and the ADA requirements. RTA employees who oversee the eligibility determination process also understand their responsibilities.

Review team members interviewed training managers for MV Transportation, First Transit, SCR, and CDT. The review team also interviewed 31 drivers at the four Chicago contractor and two suburban sites. The training contractors provide to drivers includes a combination of classroom work and field practice, such as maintaining sensitivity to passengers and transporting, assisting and securing those who use wheelchairs. Contractors also provide refresher training, mostly via periodic safety meetings. Interviewed drivers appeared to understand their responsibilities and Pace policies.

As noted in Section 5.3, riders the review team interviewed were mostly complimentary about drivers. Several riders said that the older drivers are more courteous and knowledgeable. One Chicago rider believed that CDT and MV Transportation drivers are more courteous. Drivers often provide extra service on request, such as carrying bags.

Review team members observed call-takers at the RMMCC (May 18 and 22), MV Transportation (Niles, May 19; Chicago, May 24), and CDT (May 23). The call-takers appeared to understand their responsibilities, including the ADA requirements, Pace policies, and use of the paratransit software.

Review team members also observed and interviewed schedulers and dispatchers at six contractor sites. The contractor staff appeared to have sufficient training in their job responsibilities and were aware of treating individuals who use the service in a respectful and courteous way.

6.10 Service Under Contract with a Private Entity

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

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

Discussion: During this compliance review, no deficiencies were found with how Pace monitors the paratransit service private entities provide. Pace has a team of managers whose sole responsibility is oversight of contractors who accept trip requests, schedule trips, deliver trips, and maintain Pace vehicles. Service provider contracts all specify performance standards for travel time, on-time pickup and drop-off performance, and missed trips.

As discussed in Section 6.4 (No Substantial Numbers of Trips With Excessive Trip Lengths), Pace analyzes trips quarterly. If particular riders have a high number of trips longer than comparable fixed route trips, Pace sends a letter to the carrier asking for a plan to ensure future service does not reflect a pattern.

For on-time pickup and drop-off performance, Pace's contract managers run reports and compare performance to their standards at least bi-monthly. In addition, Pace managers carefully monitor on-time performance each service day and require carriers to identify performance issues with an accompanying plan of action to achieve on-time performance.

For missed trips, Pace requires carriers to submit a Provider Missed Trip Report. Pace assesses a liquidated damage for each reported missed trip equal to two times the hourly reimbursement rate that it pays to the carrier. If Pace identifies a missed trip that a carrier did not report, it assesses a liquidated damage equal to four times the hourly reimbursement rate that it pays to the carrier.

Pace's contracts with the RMMCC operator and other contractors that accept trip requests specify performance standards for hold times and call abandonment rates. Pace produces an Excel file to analyze data its telephone management software generates for call data. Pace may impose liquidated damages when contractors do not meet the telephone performance standards.

6.11 Service Provided by Another Public Entity

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

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

Discussion: During this compliance review, no deficiencies were found with how Pace monitors the eligibility certification process RTA performs or with CTA's monitoring of Pace's service and RTA's eligibility certification.

As discussed in Section 4, Pace operates paratransit service that complements Pace Suburban Bus' and CTA's fixed route systems. RTA oversees ADA paratransit eligibility for both Pace and CTA. As such, both Pace and CTA have an obligation to monitor RTA's eligibility certification and appeal process and CTA has an obligation to monitor Pace's Chicago paratransit service.

Pace works closely with RTA on rider eligibility, including transporting applicants and riders to certification and recertification appointments. Pace also performs spot inspection of the eligibility centers and regularly monitors RTA statistics to help forecast demand. Pace also receives and investigates any complaints about the eligibility process.

The 2008 Illinois legislation established Pace as the operating entity for CTA's paratransit service. As such, CTA does not need a formal agreement with Pace. CTA monitors the Pace complementary paratransit service provided on its behalf through participation in several ADA committees, as follows:

- A seven-member Chicago Transit Board governs CTA, with four members appointed by the Mayor of Chicago, who also appoints a Pace board member, currently the Commissioner of the Mayor's Office for People with Disabilities. She thus receives regular information on the operation of Pace's ADA paratransit service, providing oversight for the City of Chicago and CTA.
- The ADA Coordinating Committee includes the CEO's, ADA managers, and board representation from each of the four participating agencies (CTA, Pace, TRA, and Metra). ADA eligibility and paratransit performance is discussed at these biannual meetings. For example, the August 1, 2016 meeting agenda included an update on the ADA paratransit certification program and the Pace ADA performance. The January 23, 2017 meeting included a 30-minute update on the Pace ADA paratransit program.
- The ADA Working Group includes the ADA managers from CTA, Pace, RTA, and Metra. This group meets approximately every 6–8 weeks and discusses issues retarding paratransit and other relevant accessibility services and programs.
- Pace has two ADA Advisory Committees, one in Chicago and one in the suburbs. CTA's ADA Manager of ADA Compliance Programs attends these meetings, as do Pace's ADA managers. At the Pace Advisory Committee meetings, Pace provides ADA paratransit ridership data broken down by month, carrier and location, on-time performance data, on-time performance for appointments, paratransit complaint totals (broken down by category).

6.12 Coordination of Service

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

Discussion: During this compliance review, no deficiencies were found with how Pace coordinates service with other fixed route operators with overlapping or contiguous service areas or jurisdictions.

Pace coordinates the complementary paratransit services that CTA and Pace are required to provide. Pace provides transfers between the Chicago and suburban service areas with a single fare structure for the entire service area. Its eligibility process and service policies for Chicago and the suburbs are the same.

Pace's and CTA's fixed route service areas do not overlap or adjoin the service areas of any other fixed route operators.

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/Exit Meeting Notes	Response Days/ Date
1	Comparable complementary paratransit service	37.121	No deficiencies		
2	Absence of administrative burden	37.125 & 37.5	No deficiencies		
3	ADA paratransit eligibility standards	37.123(e) (1)-(3)	No deficiencies		
4	Accessible information	37.125(b)	No deficiencies Advisory comment		
5	Eligibility determinations within 21 days	37.125(c)	No deficiencies		
6	Written eligibility determinations including specific reasons for denials or temporary or conditional eligibility	37.125(d)(e)	Deficiency	Temporary eligibility letters do not mention right to appeal the determination	60/3-18
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	Advisory comment		

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency/Exit Meeting Notes	Response Days/ Date
10	Types of service	37.129	No deficiencies		
11	Service area	37.131(a)	No deficiencies		
12	Response time	37.131(b)	No deficiencies		
13	Fares	37.131(c)	Deficiency	Paratransit fares for comparable trips via four subsidized free-fare bus routes must also be free	60/3-18
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 below		
17	No restrictions on the number of trips provided to an individual	37.131(f)(1)	No deficiencies		
18	No waiting list for access to the service	37.131(f)(2)	No deficiencies		
19	No substantial numbers of significantly untimely pickups for initial or return trips	37.131(f)(3)(i)(a)	No deficiencies		
20	No substantial numbers of trip denials or missed trips	37.131(f)(3)(i)(b) 37.131(3)(1)(b)	No deficiencies		
21	No substantial numbers of trips with excessive trip lengths	37.131(f)(3)(i)(c)	No deficiencies		

Item	Part 27 or 37 or 38 Requirement	Reference	Site Visit Finding deficiency/no deficiency or advisory comment	Finding(s) of Deficiency/Exit Meeting Notes	Response Days/ Date
22a	No operational patterns or practices significantly limiting service availability (telephone hold times)	37.131(f)	Advisory comment		
22b	No operational patterns or practices significantly limiting service availability (untimely drop-offs)	37.131(f)	Deficiency Advisory comment	The number of very early drop-offs for trips with appointment times is high	60/3-18
23	Subscription Service	37.133	No deficiencies		
24	No-show, late cancel and reasonable service suspension & appeal policies	37.125(h) (1)-(3)	No deficiencies		
25	Complaint Resolution & Compliance Information	27.13(a)(b) & 27.121	No deficiencies		
26	Nondiscrimination	37.5	No deficiencies		
27	Training	37.173	No deficiencies		
28	Service under contract with a private entity	37.23	No deficiencies		
29	Service provided by another public entity	37.21(b)	No deficiencies		
30	Coordination of service	37.139(g)	Not applicable		

Attachment A
FTA Notification Letter



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

Headquarters

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

January 31, 2017

Mr. Dorval R. Carter, Jr., President
Chicago Transit Authority
567 W. Lake Street
Chicago, IL 60661

Mr. Thomas J. Ross, Executive Director
PACE Suburban Bus Service
550 W. Algonquin Road
Arlington Heights, IL 60005

Dear Messrs. Carter and Ross:

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the Americans with Disabilities Act of 1990 (ADA) and the Department of Transportation's (DOT) implementing regulations at 49 CFR Parts 27, 37, 38 and 39 as they apply to public transportation. As part of its ongoing oversight efforts, FTA through its Office of Civil Rights conducts a number of on-site ADA compliance reviews of grant recipients. The Chicago Transit Authority (CTA) and Pace have been selected for a review of ADA paratransit service to take place during from May 18–26, 2017.

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

The review process includes data collection prior to the site visit, an opening conference, an on-site analysis of the ADA complementary paratransit service, and an exit conference. The entire on-site portion of the review will be completed over seven working days. FTA has engaged the services of the Collaborative, Inc. (the Collaborative) of Boston, MA to conduct this compliance review. As part of the review, the following FTA contractor personnel will be granted temporary access to your TrAMS account: William Schwartz, David Chia, Jim Purdy, and Karla Karash. Please do not remove these individuals. FTA will do so at the close of the 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. Central on Thursday May 18, 2017**, to introduce the Collaborative team and FTA representatives to CTA and Pace, including you or your designee, representatives responsible for ADA paratransit eligibility and paratransit operations, 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 CTA offices for the duration of their visit. Please let us know if you will designate a member of your staff to serve as CTA's and Pace's liaisons with the review team and will coordinate the site visit and address questions that may arise during the visit.

So that we may properly prepare for the site visit, we request that you provide the information described in Enclosures 1 and 2. Enclosure 1 consists of items that the Collaborative must receive by **April 6, 2017**. These materials should be forwarded to:

Bill Schwartz
 Sr. Vice President
 The Collaborative, Inc.
 122 South Street
 Boston, MA 02111
 617-306-9466
wschwartz@thecollaborative.com

Enclosure 2 consists of items that the Collaborative team will review on site beginning on May 18, 2017 after the opening conference.

We request the exit conference be scheduled for **2 p.m. Central on Friday May 26, 2017**, to afford an opportunity for the reviewers to discuss their observations with you and your agency. We request that you or your designee, the director of ADA Paratransit service, each grantee's 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 CTA and Pace, will be considered public documents subject to release under the Freedom of Information Act, upon request.

CTA and Pace representatives are welcome to accompany the review team during the on-site activities, if you so choose. If you have any questions or concerns before the opening conference, please contact John Day, Program Manager for this compliance review, at 202-366-1671 or via e-mail at *john.day@dot.gov*.

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

Sincerely,



John Day
 Program Manager for Policy & Technical Assistance

cc: Marisol Simon, Regional Administrator, FTA Region V
 Marjorie Hughes Regional Civil Rights Officer, FTA Region V
 Melinda Metzger, Deputy Executive Director, Pace
 Sylvia Peistrup, TrAMS User Manager, Pace
 Jeff Hulbert, Senior Manager, Regulatory Compliance, CTA
 Angela King, TrAMS User Manager, CTA
 William Schwartz, the Collaborative, Inc.

Enclosure 1

The following information must be submitted to the Collaborative by April 6, 2017.

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 contracts with private entities any agreements for complementary paratransit eligibility or operations with other public entities
3. A copy of all rider guides, service brochures, or other documents that explain to the public and eligible riders how trips are requested and how service is provided
4. A description of the complementary paratransit service standards, including:
 - How is “on-time” performance defined and what is the goal for the percentage of trips to be provided within the standards? Are there standards and goals for both pickups and drop-offs?
 - What standards have been set regarding acceptable numbers or percentages of ADA trip denials?
 - What is the standard for acceptable trip length (time)? What is the performance goal?
 - Do you make any such definitions or standards public?
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. Four copies of the fixed route system map

Enclosure 2

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

1. Copies of completed driver manifests for the most recent six-month period
2. The following complementary paratransit data, by month, for the last six months (paper copies as well as in electronic format, if available):
 - Trips requested
 - Trips scheduled
 - Trips denied
 - Canceled trips
 - Passenger no-shows
 - Carrier missed trips
 - Trips provided
 - 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

CTA and Pace: ADA Complementary Paratransit Compliance Review

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

Attachment B
Response Letter



Thomas J. Ross
Executive Director

September 28, 2017

Mr. John Day
Program Manager for Policy and Technical Assistance
Federal Transit Administration Office of Civil Rights
U.S. Department of Transportation
1200 New Jersey Ave., SE, Room E-54-310
Washington, DC 20590

Re: Response to *Pace Paratransit ADA Paratransit Compliance Review Draft Report*

Dear Mr. Day:

Thank you for sending the review copy of the *Pace Paratransit ADA Paratransit Compliance Review Draft Report August 2017* for the ADA Paratransit Compliance Review of Pace Suburban Bus and the Chicago Transit Authority (CTA), conducted May 18-26, 2017. We appreciate the opportunity to review the report and have prepared a coordinated response, including letters from Pace Suburban Bus, the Chicago Transit Authority (CTA) and the Regional Transportation Authority (RTA).

Collectively, we are pleased that the FTA Office of Civil Rights recognizes the positive elements of our service as summarized on page 1 of the *Draft Report*:

Positive Program Elements

- RTA's eligibility process is comprehensive and thorough
- Pace's operational standards and overall service performance are very high
- Pace's complaint investigation, tracking, and resolution process is comprehensive and thorough

These observations confirm the very positive feedback we all received during the past two cycles of Triennial Reviews, which included enhanced review modules (ERMs) for the ADA service component. We also appreciate the review team's recognition of the hard work that goes into providing exemplary service, including our carriers, our staff members, our advisory boards and our customers.

As requested, Pace has put together a list of factual corrections and/or clarifications, which is enclosed in this letter. Corrections and/or clarifications are also included with the CTA and RTA letters. Additionally, we are requesting that FTA remove the four Administrative and Substantive Deficiencies for the reasons cited in this letter.

September 28, 2017

Mr. John Day

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Response to *Pace Paratransit ADA Paratransit Compliance Review Draft Report*

Administrative Deficiencies

- RTA's letters conveying temporary eligibility do not mention the right to appeal
- Paratransit fares for comparable trips via five free-fare Pace bus routes are not free

Administrative Deficiency:

- **RTA's letters conveying temporary eligibility do not mention the right to appeal**

We request that this Administrative Deficiency (Item #6) be removed.

As stated in the RTA's response letter: "The RTA is requesting that the FTA remove this administrative deficiency from the final draft of the report, as the RTA believes this deficiency was based on a misunderstanding of RTA's processes."

We agree that the RTA has included the specific rationale and recommended edits to clarify the RTA's approach to temporary eligibility, which we believe is consistent with ADA regulatory requirements.

Administrative Deficiency:

- **Paratransit fares for comparable trips via five free-fare Pace bus routes are not free**

We request that this Administrative Deficiency (Item #13) be removed.

Pace believes the reviewers' characterization of the five community circulator programs is inaccurate and based on incomplete information. Pace operates five community circulator routes where fares are not collected from passengers:

- Niles Township Courtesy Bus (3 routes)
- Rosemont Entertainment Circulator
- Schaumburg's Woodfield Trolley

Niles Township Courtesy Buses: Pace has a Service Agreement with the Village of Niles to provide service for Routes 410, 411 and 412. These routes are open to the public and are subject to Pace's fixed route fare. Per the Agreement, the Village has elected to forego the collection of fares from its passengers, and therefore is responsible for remitting to Pace, on a monthly basis, an amount equal to the current Pace fare multiplied by its reported monthly ridership. The fixed route fare that the Village is responsible for is \$1.75 per rider and the paratransit fare is \$3.00 per rider which complies with the regulation that paratransit fare cannot be greater than twice the fare charged for fixed route service.

Rosemont Entertainment Circulator is a community-sponsored shuttle open to the general public. The City of Rosemont has an agreement with Pace to operate the circulator on behalf of

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Response to Pace Paratransit ADA Paratransit Compliance Review Draft Report

the city. The small buses provide shuttle service between the Rosemont CTA rail station/bus hub directly to the Rosemont entertainment district, where four stops are located. The lift-equipped buses are wrapped/branded specifically for this service and the stop signs also are identified as circulator stops.

Schaumburg's Woodfield Trolley is a community-sponsored shuttle open to the general public. The Village of Schaumburg has an agreement with Pace to operate the circulator on behalf of the village. The trolleys provide limited stop service between the Pace Northwest Transportation Center and Renaissance Schaumburg Hotel and Convention Center, serving a total of eight stops at several shopping/entertainment districts plus one flag stop. The accessible trolleys used for service are painted/branded specifically for this service, and the stop signs are identified as trolley stops.

*Because Niles, Rosemont and Schaumburg pay Pace for the fares for the users of these services, then the service is not free and we have no legal obligation to make the ADA fare free. Furthermore, the Rosemont and Schaumburg circulators are not part of the Pace fixed route service. They are branded circulators serving entertainment districts with designated circulator stops. **Given this information, we believe we are in compliance with 49 CFR 37.131(c) and the Administrative deficiency should be removed.***

Substantive Deficiencies

- The number of very early drop-offs for trips with appointment times is high
- CTA does not formally monitor the services that RTA or Pace provide on its behalf

Substantive Deficiency:

- **The number of very early drop-offs for trips with appointment times is high**

We request that this Substantive Deficiency (Item #22b) be removed.

On page 33 of the *Draft Report*, FTA states:

Discussion: During this compliance review, a deficiency was found with Pace's on-time drop-off performance with respect to the number of very early drop-offs.

The topic of early arrivals for drop-offs for appointments was discussed at length when the Review Team was on-site. As noted on page 33 of the *Draft Report*, the Pace carrier contracts state: "dropping off a rider on-time for their appointment shall be defined as dropping the rider off at their destination on or before the recorded appointment time."

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Response to *Pace Paratransit ADA Paratransit Compliance Review Draft Report*

On page 33 of the *Draft Report*, FTA paraphrases the requirements of 49 CFR 37.131(f) as follows:

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.

However, the regulations do not include “untimely drop-offs for appointments” as a capacity constraint. The actual verbiage of 49 CFR 37.131(f) Capacity constraints is silent on the topic of appointment times; rather it is specific to restrictions/limitations to accessing service:

49 CFR 37.131(f) Capacity constraints. The entity shall not limit the availability of complementary paratransit service to ADA paratransit eligible individuals by any of the following:

- (1) Restrictions on the number of trips an individual will be provided;
- (2) Waiting lists for access to the service; or
- (3) Any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons.
 - (i) Such patterns or practices include, but are not limited to, the following:
 - (A) Substantial numbers of significantly untimely pickups for initial or return trips;
 - (B) Substantial numbers of trip denials or missed trips;
 - (C) Substantial numbers of trips with excessive trip lengths.
 - (ii) Operational problems attributable to causes beyond the control of the entity (including, but not limited to, weather or traffic conditions affecting all vehicular traffic that were not anticipated at the time a trip was scheduled) shall not be a basis for determining that such a pattern or practice exists.

The FTA does include a discussion on “Untimely Drop-Offs” on page 8-24 in the FTA Circular C 4710.1 when in the context of “capacity constraints” FTA adds verbiage about other practices that might “discourage use of complementary paratransit service” (see underlined sections below):

C.4710.1 – 8.5.6 Other Potential Limits to Paratransit Service Availability

While § 37.131(f)(3)(i) lists three examples of patterns or practices that significantly limit the availability of service, the regulations specifically prohibit “any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons” (§ 37.131(f)(3)). Other capacity constraints, including untimely drop-offs, poor

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Response to *Pace Paratransit ADA Paratransit Compliance Review Draft Report*

telephone performance, and general practices that can discourage use of complementary paratransit, are discussed in this section.

Untimely Drop-Offs

All travelers using a transportation provider to travel to a time-sensitive appointment want to have confidence in the provider's reliability. This is also true for complementary paratransit. Frequently arriving late to appointments could discourage use of the service. As such, FTA considers a pattern or practice of untimely drop-offs for trips with stated appointment times as a capacity constraint. As in pickup performance, monitoring on-time performance for trips with requested drop-offs is necessary. If the analysis indicates a pattern of late drop-offs, agencies can then make appropriate operational changes.

FTA encourages establishing policies to drop off riders no more than 30 minutes before appointment times and no later than appointment times. Some transit agencies schedule drop-offs no later than 5 minutes before appointment times to allow riders time to get from vehicles to appointments.

Pace regularly monitors arrival on-time performance for appointments (AOTP) and works on an on-going basis to improve AOTP – both for very early arrivals and for late arrivals. *We agree with the FTA that it is a good practice to drop-off passengers no earlier than 30 minutes prior to their appointment time; however, there is no regulatory basis for the FTA to assess a Substantive Deficiency for early AOTP and therefore we ask that it be removed.*

Substantive Deficiency:

- **The CTA does not formally monitor the services that RTA or Pace provide on its behalf**

We request that this Substantive Deficiency (Item #29) be removed.

On page 38 of the *Draft Report*, FTA states (underlining added):

Discussion: During this compliance review, no deficiencies were found with how Pace monitors the eligibility certification process RTA performs. A deficiency was found with CTA's monitoring of Pace's service and RTA's eligibility certification.

For more than a decade, the RTA, CTA and Pace have worked cooperatively to provide excellent customer service for our City and Suburban ADA Paratransit riders. This is evidenced by the updated Regional ADA Paratransit Plan, submitted to the FTA Office of Civil Rights in 2006 (and with FTA input as it was being developed), which outlined the respective agency responsibilities when the RTA Act was amended and Federal Legislation enacted to designate responsibilities among the RTA, CTA and Pace.

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Mr. John Day

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Response to Pace Paratransit ADA Paratransit Compliance Review Draft Report

During the past two CTA and RTA Triennial Reviews, the topic of monitoring Pace ADA Paratransit was discussed extensively. In both instances, the FTA found no deficiencies with respect to oversight and monitoring. Enclosure #1 includes the correspondence between CTA and FTA. As described in the letter, dated March 31, 2014 from CTA to Melody Hopson at the FTA Region V office, in 2006, pursuant to Illinois State law, ADA Paratransit services in the northeastern Illinois region became the sole responsibility of Pace.

Understanding the continued oversight responsibility that corresponded to the arrangement, CTA has worked with Pace and the RTA since that juncture to monitor the delivery of complementary ADA Paratransit in this region. A previous letter, dated July 23, 2010, from CTA to Dominick Gato at the FTA Region V office, provided the same type of information related to oversight and monitoring in response to questions raised in the 2010 CTA Triennial Review. In a follow-up letter dated January 5, 2011, Mr. Gato accepted the information provided on monitoring and oversight, and closed the CTA's 2010 Triennial Review with no deficiencies.

As such, we respectfully request that the Substantive Deficiency regarding formal monitoring of service be removed.

In closing, thank you again for the opportunity to review the draft report and we welcome any additional discussion that may be needed.

Sincerely,



Melinda J. Metzger
Deputy Executive Director
Revenue Services

cc: T.J. Ross, Pace Executive Director
Dorval Carter, CTA President
Leanne Redden, RTA Executive Director
Marisol Simon, FTA Region V Administrator
Jeffrey Hulbert, CTA Senior Compliance Officer
Michael VanDekreke, RTA Director Mobility Services
William Schwartz, the Collaborative, Inc.

Enclosures:

- Enclosure #1 – Pace Corrections/Edits
- Enclosure #2 – RTA Response Letter
- Enclosure #3 – CTA Response Letter & Draft Report Mark-up

Item #29

- CTA letter to U.S. DOT dated March 31, 2014
- CTA letter to FTA dated July 23, 2010
- FTA letter to CTA dated January 5, 2011
- Two pages of Public Law 109-59 dated August 10, 2005



Item 29

567 West Lake Street
Chicago, Illinois 60661-1498
TEL 312 664-7200
www.transitchicago.com

March 31, 2014

Melody Hopson
U.S. Department of Transportation
200 W. Adams Street, Suite 320
Chicago, IL 60606

Re: FTA 2013 Triennial Review – ADA Paratransit Finding

Dear Ms. Hopson:

With respect to the above-referenced finding, the Chicago Transit Authority (CTA) submits the following information.

2010 FTA Triennial Review

In July 2006, pursuant to Illinois State law, ADA Paratransit services in the Northeastern Illinois region became the sole responsibility of Pace. Understanding the continued oversight responsibilities that corresponded to this arrangement, CTA has worked with Pace and the Regional Transportation Authority (RTA) since that juncture to monitor the delivery of complementary ADA Paratransit service to the region.

In July 2010, RTA submitted to FTA's Regional Counsel documentation explaining the relationship between CTA, RTA, and Pace as well as the roles that are played in the provision, management, and oversight of ADA Paratransit service. These documents were provided, in part, as a response to an ADA Paratransit finding that stemmed from FTA's 2010 triennial review. In early 2011, CTA received a letter from the FTA Regional office that accepted this documentation, confirmed the structure of the ADA Coordinating Committee (Committee) as satisfactory, and affirmed the resolution of the finding to close out the deficiency (see attached documents).

CTA's Current Oversight and Monitoring Procedures – The ADA Coordinating Committee

CTA's role in the Committee, which has not changed since the resolution of the 2010 finding, is extensive and essential to the charge of its function. The Committee develops policy and supports executive decision-making at both the RTA and Pace. The Committee also provides policy direction for the implementation of ADA-related initiatives and is a forum for communication and decision-making on policy.

One major objective of the Committee is to ensure that the region's transit system is in compliance with ADA Paratransit regulations. While recognizing that the Committee presents a unique arrangement, CTA continues to proactively monitor the provision of Paratransit service and believes that both SAFETEA-LU and the state RTA Act, as amended, anticipate and account for the monitoring and oversight structure.

3/31/14

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As in 2010, CTA's continued participation in the activities of the Committee complies with the spirit, intent, and letter of the ADA regulations.

While RTA is tasked with the responsibility through state law, CTA is involved with oversight and monitoring activities in the following ways:

- The Oversight and Technical Assistance Plan - Ensures overall adherence.
- The Staff Working Group - Analyzes proposed ADA/accessibility-related strategic planning, operating, and budgetary initiatives for all modes and reports findings and recommendations to the Committee, as needed.
- The Performance Measures Task Force - Coordinating to produce an annual Report Card of Sub-Regional Performance Measures, including metrics pertaining to ADA Paratransit service.
- The Monitoring Action Plan - Reports of regular monitoring activities presented to the Committee.

Future CTA Actions

Under my direction, CTA's ADA Compliance Manager will personally test and assess the ADA Paratransit service on a quarterly basis. CTA has coordinated with Pace and arranged for CTA's ADA Compliance Manager to be provided with an alias in order to utilize the service anonymously. Reports will be generated by CTA's ADA Compliance Manager based on his or her assessment of the service provisions. These reports will present an additional means to monitor compliance.

Also, as a means to further augment CTA's oversight and monitoring of the Paratransit service, Pace is developing a SharePoint site that will compile Paratransit data, thereby more efficiently facilitating management's detailed review. CTA will have access to this file-sharing site and be able to view data that is segregated to specifically address CTA's service area. The intention behind enabling this more targeted analysis is to allow CTA to focus on evaluating the data that is particular to its service area, apart from the regional data. This functionality will strengthen policy development and oversight.

CTA, in conjunction with its regional partners RTA and Pace, believe that the above-described policies and procedures meet the requirements of the ADA Act. With the consideration of the additional corrective actions described here, CTA requests that the findings in the ADA area be considered satisfied and closed.

Sincerely,



Eva-Dina Delgado

Vice President

Government & Community Relations

cc: D. Love



July 23, 2010

RICHARD L. RODRIGUEZ
President

CHICAGO TRANSIT AUTHORITY

567 West Lake Street
Chicago, Illinois 60661-1498
TEL 312 681-5000
FAX 312 681-5005

Mr. Dominick J. Gatto
Director, Office of Operations and Program Management
Federal Transit Administration – Region 5
200 West Adams Street, Suite 320
Chicago, Illinois 60606

Re: FTA 2010 Triennial Review – ADA Paratransit Finding

Dear Mr. Gatto:

With respect to the above-referenced finding, the Regional Transportation Authority (RTA) has provided documentation regarding regional paratransit services, and we are providing additional information below as part of a cumulative response. The Chicago Transit Authority hopes that this cumulative response sufficiently serves to address the FTA finding, and may even merit a reconsideration of the finding regarding ADA Paratransit by the FTA.

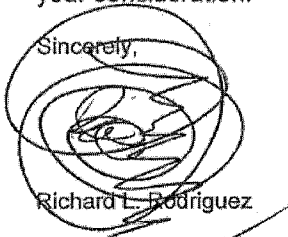
From 1981 until 2006, CTA provided paratransit service to Chicago and 40 adjacent suburbs while Pace provided service throughout the suburbs. In 2005, the Illinois General Assembly identified the need to increase paratransit service efficiencies for the entire region and took action to integrate the services in the six-county RTA with the adoption of HB 1663 (Public Act 94-0370).

Starting July 1, 2006, by State law paratransit services in the region became the sole responsibility of Pace. During the preceding months, CTA worked diligently with Pace, RTA and the disability community to ensure a smooth transition. The CTA, Pace and RTA Boards adopted the Regional ADA Paratransit Plan for Persons with Disabilities prior to its submission to FTA.

On July 6, 2010, the Regional Transportation Authority submitted to FTA Regional Counsel Cecilia Comito a copy of Regional ADA Paratransit Plan for Persons with Disabilities and the Paratransit Transfer Intergovernmental Agreement between CTA and Pace. In addition to those documents, attached to this letter is a copy of the legislation which authorized the transfer of paratransit services from CTA to Pace; that legislation provides that the RTA is responsible for the funding, financial review and oversight of all ADA paratransit services that are provided by the RTA or any of the service boards.

Accordingly, the CTA requests that the FTA consider all such information submitted by RTA and CTA to fully satisfy the present finding. The CTA also requests the FTA to reconsider its ADA Paratransit finding altogether. Please let me know if you have questions or require additional information. Thank you for your consideration.

Sincerely,



Richard L. Rodriguez

cc: Marisol Simon
Cecilia Comito
Diana Love
Stephen E. Schlickman

Attachment



U.S. Department
of Transportation
Federal Transit Administration

REGION V
Illinois, Indiana,
Michigan, Minnesota,
Ohio, Wisconsin

200 West Adams Street
Suite 320
Chicago, IL 60606-5232
312-353-2789
312-886-0351 (fax)

January 5, 2011

Mr. Richard L. Rodriguez
President
Chicago Transit Authority
567 West Lake Street
Chicago, IL 60661

Re FY 2010 Triennial Review
Chicago Transit Authority
Close Out

Dear Mr. Rodriguez:

The Federal Transit Administration (FTA) has received and reviewed your responses to the FY 2010 Triennial Review Final Report. The Chicago Transit Authority has submitted the appropriate documentation to resolve all of the deficiencies identified in the aforementioned report. Please consider your FY 2010 Triennial Review to the closed upon receipt of this letter. If you have any questions, please contact Melody Hopson, Triennial Review Coordinator at (312) 886-1611 or me at (312) 353-1653.

Sincerely,

Dominick J. Gatto, P.E., Director
Office of Program Management and Oversight

cc: Karen Walker, CTA
Amy S. Kovalan, CTA
Duana Love, FTA

“(C) coordinate with other Federal agencies to share, and otherwise avoid duplication of, transportation services provided under this subsection.

“(4) For purposes of any determination under chapter 81 of title 5 or chapter 171 of title 28, an individual shall not be considered to be in the ‘performance of duty’ or ‘acting within the scope of his or her office or employment’ by virtue of the fact that such individual is receiving transportation services under this subsection. Nor shall any time during which an individual uses such services be considered when calculating the hours of work or employment for that individual for purposes of title 5 of the United States Code, including chapter 55 of that title.

“(5)(A) The Administrator of General Services, after consultation with the appropriate agencies, shall prescribe any regulations necessary to carry out this subsection.

Regulations.

“(B) Transportation services under this subsection shall be subject neither to the last sentence of subsection (d)(3) nor to any regulations under the last sentence of subsection (e)(1).

“(6) In this subsection, the term ‘passenger carrier’ means a passenger motor vehicle or similar means of transportation that is owned, leased, or provided pursuant to contract by the United States Government.”

(2) FUNDS FOR MAINTENANCE, REPAIR, ETC.—Subsection (a) of section 1344 of title 31, United States Code, is amended by adding at the end the following:

“(3) For purposes of paragraph (1), the transportation of an individual between such individual’s place of employment and a mass transit facility pursuant to subsection (g) is transportation for an official purpose.”

(3) COORDINATION.—The authority to provide transportation services under section 1344(g) of title 31, United States Code (as amended by paragraph (1)) shall be in addition to any authority otherwise available to the agency involved.

31 USC 1344
note.

SEC. 3050. COMMUTER RAIL.

(a) IN GENERAL.—The Federal Transit Administration shall approve final design for the projects authorized under section 3030(c)(1)(A)(xlv) of the Federal Transit Act of 1998 and section 1214(g) of the Transportation Equity Act for the 21st Century (16 U.S.C. 668dd note) in the absence of an access agreement with the owner of the railroad right-of-way.

(b) TIMELY RESOLUTION OF ISSUES.—The Secretary shall timely resolve any issues delaying the completion of the projects authorized under section 1214(g) of the Transportation Equity Act for the 21st Century (16 U.S.C. 668dd note) and section 3030(c)(1)(A)(xlv) of the Federal Transit Act of 1998.

SEC. 3051. PARATRANSIT SERVICE IN ILLINOIS.

In the State of Illinois, a regional or State agency, or another transit agency, may be responsible for providing the complementary paratransit services that would otherwise be provided by a transit agency under the Americans with Disabilities Act of 1990. Where a regional or State agency, or another transit agency, undertakes to provide such services, either by agreement or pursuant to State legislation, the Secretary may audit the paratransit services provided, make recommendations, and take appropriate enforcement action directed to such regional, State, or transit agency providing the services, to ensure that the requirements of the Americans

with Disabilities Act of 1990 are met. Nothing in this Act shall be construed to conflict with the requirements of the Americans with Disabilities Act of 1990 and its implementing regulations.

Motor Carrier
Safety
Reauthorization
Act of 2005.
49 USC 30101.

TITLE IV—MOTOR CARRIER SAFETY

SEC. 4001. SHORT TITLE.

This title may be cited as the “Motor Carrier Safety Reauthorization Act of 2005”.

Subtitle A—Commercial Motor Vehicle Safety

SEC. 4101. AUTHORIZATION OF APPROPRIATIONS.

(a) MOTOR CARRIER SAFETY GRANTS.—Section 31104(a) of title 49, United States Code, is amended to read as follows:

“(a) IN GENERAL.—Subject to subsection (f), there are authorized to be appropriated from the Highway Trust Fund (other than the Mass Transit Account) to carry out section 31102—

- “(1) \$188,480,000 for fiscal year 2005;
- “(2) \$188,000,000 for fiscal year 2006;
- “(3) \$197,000,000 for fiscal year 2007;
- “(4) \$202,000,000 for fiscal year 2008; and
- “(5) \$209,000,000 for fiscal year 2009.”

(b) ADMINISTRATIVE EXPENSES.—Section 31104 of such title is amended by adding the following at the end:

“(i) ADMINISTRATIVE EXPENSES.—

“(1) AUTHORIZATION OF APPROPRIATIONS.—There are authorized to be appropriated from the Highway Trust Fund (other than the Mass Transit Account) for the Secretary of Transportation to pay administrative expenses of the Federal Motor Carrier Safety Administration—

- “(A) \$254,849,000 for fiscal year 2005;
- “(B) \$213,000,000 for fiscal year 2006;
- “(C) \$223,000,000 for fiscal year 2007;
- “(D) \$228,000,000 for fiscal year 2008; and
- “(E) \$234,000,000 for fiscal year 2009.

“(2) USE OF FUNDS.—The funds authorized by this subsection shall be used for personnel costs; administrative infrastructure; rent; information technology; programs for research and technology, information management, regulatory development, the administration of the performance and registration information system management, and outreach and education; other operating expenses; and such other expenses as may from time to time become necessary to implement statutory mandates of the Administration not funded from other sources.

“(j) AVAILABILITY OF FUNDS; CONTRACT AUTHORITY.—

“(1) PERIOD OF AVAILABILITY.—The amounts made available under this section shall remain available until expended.

“(2) INITIAL DATE OF AVAILABILITY.—Authorizations from the Highway Trust Fund (other than the Mass Transit Account) by this section shall be available for obligation on the date of their apportionment or allocation or on October 1 of the fiscal year for which they are authorized, whichever occurs first.

Enclosure #1

- Pace Corrections/Edits

Enclosure 1 – Pace Corrections/Edits

Throughout:

- References to “MV Transit” should be “MV Transportation”

P. 10/paragraph beginning with “Pace contracts...”

- Change: “Pace owns a majority of vehicles used for this service, with contractors owning the balance of the paratransit fleet.” to “Pace owns the vehicles used for service in the Pace suburban service area and contractors own the majority of vehicles used for service in the Chicago (CTA) service area.”

P. 11/paragraph beginning with “Pace’s three Cook County carriers...”

- Suggest change to “Pace’s three Suburban Cook County carriers...”

P. 14/last line: Jerald Brooks, not Jerard Brooks

P. 15/paragraph beginning “On May 19...”

- Suggest change “visited the Niles paratransit facility” to “visited the North Cook (Niles) paratransit facility”
- Suggest change “visited the Glen Ellyn paratransit facility” to “visited the DuPage County (Glen Ellyn) paratransit facility”

P. 15/paragraph beginning “On Monday, May 22...”

- Suggest change “the South Side paratransit facility operated by” to “the South Area paratransit facility operated by”
 - Alternatively, eliminate the South, Central and North references

P. 15/paragraph beginning “On May 25...”

- Suggest adding the following to the end of the first sentence: “, particularly for trips longer than 15 miles.”

P. 16/paragraph beginning “FTA provided Pace with a draft copy of”

- Suggest adding “On August 29” to the start of the sentence or it appears we were given a draft on May 26.

P. 19/Item 6.2/paragraph beginning “RTA is responsible...”

- Suggesting change “Pace oversees the process for providing services to visitors” to “Pace manages the process for providing service to visitors” since Pace handles visitor eligibility

P. 27/Fares section

- Change “However, Pace operates four local routes with a free fare:” to “However, Pace operates five local routes with a free fare.”
- Change following bullet to: “Niles Township Free Bus (routes #410, #411, and #412)
- Change last bullet to: “Schaumburg’s Woodfield Trolley (route #905)

P. 35/last paragraph, third sentence beginning “A member of Pace customer service team...”

- Change to “A member of the Pace Quality Assurance team ...”

P. 43/Item 29

- Service provided by another public entity – see enclosure Item 29/Triennial Letters

Enclosure #2

- RTA response letter dated September 18, 2017



**Regional
Transportation
Authority**

175 W. Jackson Blvd,
Suite 1650
Chicago, IL 60604
312-913-3200
RTAChicago.org

September 18, 2017

Mr. John Day
Program Manager for Policy and Technical Assistance
Federal Transit Administration Office of Civil Rights
U.S. Department of Transportation
1200 New Jersey Ave., SE, Room E-54-310
Washington, DC 20590

Re: RTA Edits and Comments on Draft Report – CTA/Pace Paratransit Compliance Review

Dear Mr. Day:

Thank you for sending the review copy of the Pace Paratransit ADA Paratransit Compliance Review Draft Report August 2017 for the ADA Paratransit Compliance Review of Pace Suburban Bus and the Chicago Transit Authority (CTA), conducted May 18-26, 2017.

This letter serves as RTA's proposed revisions to the sections of the draft report pertaining to the RTA and the RTA ADA Paratransit Eligibility Process. In June 2017, following the review (and at the suggestion of the reviewer), Michael VanDekreke, Director, Mobility Services and Anne LeFevre, Manager, ADA Paratransit Certification Program called you to discuss what RTA believes was a misunderstanding of RTA's procedures relating to the one administrative deficiency the reviewers recommended: "RTA's letters conveying temporary eligibility do not mention the right to appeal." The reviewer indicated that once the draft report is complete, the FTA would not remove or reconsider any deficiencies. During our phone call, it was our understanding that you preferred that we address this issue during our review of the draft report.

1. Challenge to RTA's administrative deficiency finding: "RTA's letters conveying temporary eligibility do not mention the right to appeal"

The RTA is requesting that the FTA remove this administrative deficiency from the final draft of the report, as the RTA believes this deficiency was based on a misunderstanding of RTA's processes. As the report indicates, the RTA bases eligibility determinations on a customer's functional ability to use fixed route transit during an in-person interview and assessment process. When a customer informs RTA that they are currently, or will soon be, receiving a treatment/therapy/medical intervention to attempt to improve his/her functioning, that s/he has experienced a recent health event that has significantly altered his/her usual level of functioning, or when a customer tells us that s/he is experiencing a temporary condition, such as a temporary physical injury (i.e. broken leg), RTA uses the temporary certification. This process ensures that the customer can complete necessary treatments/healing before a final decision is made.



At the end of the initial temporary eligibility period, the individual's certification can be 1) extended to accommodate further treatments/healing; 2) terminated, if the temporary situation is resolved (in the case of a temporary injury); or 3) reassessed to evaluate a full-term eligibility status once the temporary situation is resolved and the customer has returned to a baseline level of functioning with ongoing mobility limitations. All Temporary Eligibility decisions grant the customer full eligibility until his/her temporary condition is resolved.

Attached is a sample "Temporary Eligibility" certification letter marked as "Attachment A". You will notice that there are two sentences highlighted. These statements indicate that the customer should keep in touch with the RTA to discuss next steps for eligibility. A temporary extension and/or referral for updated assessment to evaluate full-term eligibility are managed via phone call or written request from the customer.

The RTA believes that an appeal under these circumstances would not be appropriate. The customer has already informed us that they have a temporary situation that affects his/her ability to function so the RTA is, at the time of the interview and assessment, unable to accurately determine the full-term eligibility status. In addition, the RTA process allows the customer to request continued temporary service and/or evaluation for a full-term certification by phone and without having to submit an additional application. The RTA process also allows a grace period for the customer to be able to continue under his/her initial temporary certification if s/he calls within a reasonable time frame after the Temporary Eligibility expires. In this case, the temporary eligibility functions as a way to provide the customer with unconditional ADA paratransit service until s/he is ready to have his/her ongoing baseline functioning evaluated.

2. Edits to errors in the draft report

Below are edits to errors in the draft report. I have left them in "track changes" in order to demonstrate the changes that need to be made to the text:

Page 19, Last Paragraph: Since the mid-1990s, RTA has conducted ADA paratransit eligibility determinations for individuals who want to use Pace-ADA Paratransit service. RTA's main administrative office is in downtown Chicago, 175 West Jackson Boulevard. As of late 2016, RTA has contracted MTM, Inc. to conduct interviews and in-person assessments and recommend eligibility determinations. [Comment: We changed "Pace" to "ADA" because before 2006 ADA Paratransit was run by both Pace and CTA.]

Page 20, First Paragraph: All first-time applicants have in-person interviews and assessments. Most recertifying riders also have in-person interviews and assessments. RTA's two satellite offices where interviews and in-person assessments take place are on the south side of Chicago and in-on the northwest side of Chicago. There is no application fee and Pace provides free paratransit trips to the interview/assessment sites upon request.

Page 20, Paragraph 7: RTA uses a written application, in-person interview and functional assessment in order to make eligibility decisions. In addition, -and the RTA may request additional -information from a medical professional if it is needed to make an eligibility

determination. ~~to make eligibility determinations.~~ As of April 2017, RTA had 66,623 individuals certified as ADA paratransit eligible. Between April 1, 2016 to April 30, 2017, RTA received 18,880 applications.

Page 21, 2nd Bullet Point - Top of Page: • Unconditionally or temporarily eligible: review 25 percent, decreasing eventually to 10 percent

Page 21, Paragraph 1: As appropriate, RTA requests further information from MTM to justify a recommended ed ations determination -or it may changer recommend modifying the determination without conferring with MTM. At the time of the site visit, RTA estimated that it disagreed with less than five percent of MTM's recommendations and in most cases, areas of disagreement included documentation, paperwork, or other administrative issues rather than the actual recommendation.

Page 22, Last paragraph: Discussion: During this compliance review, a deficiency was found with the letter that RTA sends on behalf of Pace and CTA to individuals to applicants who have been determined to be temporarily eligibility. This letter does not inform the applicant of the right to appeal this decision. [Comment: This whole paragraph may need to be stricken if the FTA agrees to remove the RTA's administrative deficiency, as argued by the RTA in the first half of this letter.]

Page 23, Paragraph 2: RTA's letters granting conditional eligibility or denying eligibility explain the applicant's right to appeal the decision. However, the letters that grant temporary eligibility do not include information about the applicant's right to appeal the decision. Since temporary eligibility is a limited form of eligibility, the regulations require that applicants receiving this determination have the right to appeal, and transit agencies must inform them of this right. [Comment: This whole paragraph may need to be stricken if the FTA agrees to remove the RTA's administrative deficiency, as argued by the RTA in the first half of this letter.]

Page 23, Paragraph 5: Discussion: During this compliance review, no deficiencies were found with RTA's process on behalf of Pace and CTA for recertifying ADA paratransit eligibility.

Page 23, Paragraph 7: In 2015, RTA began to let certain individuals reapply with shorter applications (omitting "Abilities to use fixed route buses of "L" trains" and "Abilities to use fixed route buses of "L" trains" sections) and without in-person interviews. To qualify for mail-in recertifications, riders must be determined unconditionally eligible on their current application and meet at least one of these additional criteria:

1. Be at least 75 years old in the year of current application
2. Have been found unconditionally eligible for past two -three consecutive certifications
3. Have a severe or profound cognitive or intellectual -disability
4. Have a severe physical disability with complex medical needs requiring constant monitoring and frequent intervention

5. In cases where Have a combination of factors exist, including diagnosis, prognosis, mobility aid and lack of independent mobility such that the possibility for independent mobility in the future is extremely unlikely. disabilities preventing use of fixed route that are unlikely to improve

Page 24, Paragraph 3: After RTA receives the written request, it performs an administrative review of the determination. Based on this review, RTA may revise the determination and/or request additional assessment. ~~second in person interview and assessment~~. RTA will notify the appellant of any revision to the initial determination following the administrative review. The appellant may accept this new determination or proceed with a formal appeal. In most cases no oversight is identified in the administrative review and the appeal request is forwarded onto the Eligibility Review Board for a formal appeal with no changes being made.

Page 24, Paragraph 5: Upon request, RTA will arrange for Pace to provides paratransit service to the hearing. At the appellant's request, the hearing may take place via conference call. Whether in person or via conference call, appellants can offer further documentation and/or invite others to speak on their behalf. The appellant may also choose not to participate in the hearing. The review board makes a decision within 30 days after the hearing. ~~Pace~~ RTA provides the decision in writing (or other requested accessible format). Upon request, ~~Pace~~ RTA also provides an audio recording of the appeal hearing.

Thank you for the opportunity to review the draft report. If you have any questions or need clarification on any points within this letter, please feel free to contact me at (312) 913-3204 or vandekrekem@rtachicago.org.

Sincerely,



Michael VanDekreke, LCSW
Director, Mobility Services

[Page left intentionally blank]



Attachment A

CERTIFICATION LETTER

TEMPORARY ELIGIBILITY

DATE OF NOTICE: Month Day, Year spell out long form ex. May 1, 2016

ADA PARATRANSIT I.D. #: PXXXXXX

Jane Applicant
123 S. Main Street
Chicago, IL 60637

Dear M:

Thank you for completing the Regional Transportation Authority's ADA Paratransit Application. According to Federal Regulations, a person is eligible for ADA Paratransit only if they cannot use the regularly scheduled fixed route bus and train service some or all of the time because of their disability.

Based on established guidelines and information from your application, interview, and functional assessment, you are **ELIGIBLE** for the ADA Paratransit programs operated by Pace on a **TEMPORARY BASIS**. You can ride ADA Paratransit for all your trips:

- While you are recovering from your recent stroke and completing rehabilitation therapy.

Your temporary eligibility will expire [date of notice in 3 months, 6 months, 1 year, etc. spell out ex. May 1, 2020]. **Please contact us approximately 4 weeks before the expiration date if you need to request an extension of your ADA Paratransit eligibility.**

Your application, interview and functional assessment indicated that you are currently unable to perform the necessary tasks for independent travel on fixed route service. You demonstrated that you are only able to walk to the curb due to weakness and balance problems.

We have enclosed information from Pace, which explains their Regional ADA Paratransit programs and tells you how to get a ride.

ADA PARATRANSIT I.D. CARD

Your ADA Paratransit I.D. Card will be mailed to you about 10 – 14 days after you receive this letter. When you receive your card, please carry it with you since you must show it to the driver each time you ride ADA Paratransit transportation. Until you receive your card, this letter is proof that you are eligible for Pace's Regional ADA Paratransit programs. Plus, if you travel to cities outside the Chicago area, this letter is proof that you are eligible for their ADA Paratransit service too.

Your ADA Paratransit I.D. Card is also a Reduced Fare Permit, which means you can ride our regularly scheduled CTA, Metra or Pace bus and train service for **half price**. You must have your ADA Paratransit/Reduced Fare I.D. Card before you can ride fixed route service at half price. This letter **cannot** be used to receive half fare on fixed route service.

If you have any questions about your certification, feel free to call us at 312/663-HELP (4357) between 8:30AM and 5:00PM weekdays. Please notify us if your situation or disability changes, or if you no longer need to use ADA Paratransit transportation.

Sincerely,

[Name of Certifier]

Mobility/Initial Assessment Evaluator

Enclosures: ADA Paratransit brochures

Enclosure #3

- CTA response letter dated September 26, 2017
- CTA mark-up of FTA Pace Paratransit ADA Compliance Review, draft report dated August 2017



Enclosure 3

September 26, 2017

Mr. John Day
Program Manager for Policy and Technical Assistance
Federal Transit Administration Office of Civil Rights
U.S. Department of Transportation
1200 New Jersey Ave., SE, Room E-54-310
Washington, DC 20590

Re: Draft Report – CTA/Pace Paratransit Compliance Review

Dear Mr. Day:

Thank you for sending the review copy of the *Pace Paratransit, ADA Paratransit Compliance Review, Draft Report, August 2017* (Draft Report) for the Federal Transit Administration's ADA Paratransit Compliance Review of Pace Suburban Bus and the Chicago Transit Authority (CTA), conducted May 18-26, 2017.

CTA has reviewed the Draft Report. Subsequently, CTA has produced a tracked changes version of the subject document which identifies a variety of minor typographical errors as well as a few factual items. The file is named "Pace-CTA Paratransit Draft Report_09252017" and it will be transmitted via email with this letter (as well as Pace's and RTA's individual responses to the Draft Report).

In particular, CTA believes that the description contained in the Draft Report regarding its monitoring and reporting oversight activities (on page 1 in the Executive Summary as well as on page 39 in the "Discussion" portion of Section 6.13) is inaccurate.

CTA does, in fact, monitor the services provided by RTA and Pace on its behalf. A number of formal activities associated with that active and ongoing monitoring are discussed on page 39 of the Draft Report. Numerous formal reports and data are shared and discussed frequently as inherent elements of that coordination. While on site, the review team commented on the abundance of data that is shared, as well as the level of coordination observed, amongst the agencies. As such, CTA disagrees with this finding.

Thank you for your consideration. We look forward to receiving the Final Report. If you have any questions regarding CTA's recommended clarifications, please call me at (312) 681-4100 or email me at cmorey@transitchicago.com

Sincerely,

A handwritten signature in black ink, which appears to read "Carole A. Morey". The signature is written in a cursive style.

Carole A. Morey
Chief Planning Officer

Attachment C
Paratransit Application




Regional Transportation Authority ADA Paratransit Application

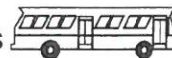




Regional Transportation Authority ADA Paratransit Application



If you have a disability which prevents you from using CTA and Pace fixed route buses and CTA "L" trains,  please complete this form and then call the ADA Paratransit Certification program at 312/663-HELP (4357) to schedule an in-person interview. Bring this form (completed as much as possible) and a photo ID to the interview.



Please read the attached instructions and brochure before completing this form. The brochure explains more about the Pace Regional ADA Paratransit Service. If you have questions about the services, eligibility, or need assistance, please call the ADA Paratransit Certification program at the number listed above. Also call if you need this application in large print, Braille, on audio tape or audio CD, or in Spanish.

I. General Information (Please Print)

Social Security Number _____ Birthdate _____

(The RTA uses Social Security Numbers only as a way to track applications and for possible federal or state funding for ADA Paratransit services. If you do not provide a Social Security Number, we will assign another number to your application).

First Name _____ Middle Initial _____

Last Name _____ Sex: M ___ F ___

Street Address _____ Apt # _____

City _____ State _____ Zip _____ County _____

Phone [daytime] (____) _____ [evening] (____) _____

Mailing Address (if different) _____

City _____ State _____ Zip _____ County _____

Email Address (optional) _____

**Please check below how you would like written material sent to you in the future.
(Check only one.)**

Regular Print

Large Print

Audio Tape

Braille

Spanish (en español)

Audio CD

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

Name _____ Relationship _____

Phone [daytime] (____) _____ [evening] (____) _____

II. Disability and Mobility Equipment Information

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

It may be helpful to bring documentation of your health condition or disability to the interview along with this completed application form.

If this is a temporary disability or health condition, how long do you expect it to prevent you from using fixed route buses and "L" trains? _____ months

Do you use any of these mobility aids or equipment? (Check all that apply.)

- | | |
|---|---|
| <input type="checkbox"/> cane | <input type="checkbox"/> powered wheelchair |
| <input type="checkbox"/> crutches | <input type="checkbox"/> powered scooter |
| <input type="checkbox"/> walker | <input type="checkbox"/> manual wheelchair |
| <input type="checkbox"/> leg brace | <input type="checkbox"/> long white cane |
| <input type="checkbox"/> prosthesis | <input type="checkbox"/> service animal |
| <input type="checkbox"/> portable oxygen | |
| <input type="checkbox"/> other (please specify) _____ | |

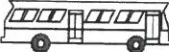
I do not use any of these mobility aids

Do you ever need to bring someone with you to help you when you travel (a "personal care assistant" or "personal attendant")?

- Yes, always Yes, sometimes No

III. Abilities to Use Fixed Route Buses or "L" Trains

Please read the following statements and check those which best describe your abilities to use fixed route buses or "L" trains . (Check all that apply.)

Fixed route buses mean the large transit buses  operated on set routes by the CTA and Pace. "L" trains mean the subway and elevated trains  operated by the CTA.

- I can get to and from bus stops or "L" train stations if the distance is not too great.
- I can ride the buses or "L" trains when I am feeling well. There are other times, however, when my disability or health condition worsens, and at these times I cannot ride the buses and "L" trains.
- I have a disability or health condition that prevents me from riding the buses and "L" trains if the weather is very hot or very cold.
- My disability or health condition makes it impossible to travel when there is snow or ice on the ground.
- I cannot climb stairs to get on and off fixed route buses and in and out of "L" train stations.
- I can get to and from bus stops or "L" train stations only if there are curb-cuts and level sidewalks.
- I have difficulty understanding or remembering all the things I would have to do to use the buses and "L" trains.
- I can use fixed route buses or "L" trains if it's someplace I go all the time.
- I can never use fixed route buses and "L" trains by myself.
- I am not really sure if I can use fixed route buses and "L" trains.
- I am not able to use fixed route buses and "L" trains for other reasons. Please explain:

IV. Please Give Us More Information About Your Functional Abilities

WITHOUT THE HELP OF SOMEONE ELSE CAN YOU...

1. Ask for and understand written or spoken instructions?

- Always Sometimes Never Not sure

2. Cross the street?

- Always Sometimes Never Not sure

3. Stand for 10 minutes if there is no place to sit?

- Always Sometimes Never Not sure

4. Step on and off a sidewalk from the curb?

- Always Sometimes Never Not sure

5. Find your own way to the bus stop or "L" station if someone shows you the way once or twice?

- Always Sometimes Never Not sure

6. Walk up and down three steps if there is a handrail?

- Always Sometimes Never Not sure

7. Walk up and down a flight of stairs if there is a handrail?

- Always Sometimes Never Not sure

8. Stand on a moving bus or "L" train holding onto a handrail?

- Always Sometimes Never Not sure

9. Transfer from one fixed route bus to another bus or between the bus and the "L" train?

- Always Sometimes Never Not sure

Under the best of conditions, what is the **FARTHEST** you can walk outdoors (or travel using your mobility aid) without the help of another person?

- | | |
|--|--|
| <input type="checkbox"/> Less than 1 block | <input type="checkbox"/> 6 blocks (3/4 mile) |
| <input type="checkbox"/> 1 block | <input type="checkbox"/> More than 6 blocks |
| <input type="checkbox"/> 2 blocks (1/4 mile) | <input type="checkbox"/> I cannot travel outdoors alone at all |
| <input type="checkbox"/> 4 blocks (1/2 mile) | |

Have you ever had training to learn how to travel around the community or on how to use fixed route buses  or "L" trains  ?

Yes

No

Would you like information about free training to use the fixed route buses, "L" trains, or Metra trains?

Yes

No

Is there anything else you want to tell us about your disability or health condition that might help us better understand your travel abilities and limitations?

V. Please Give Us Information About Where You Go and How You Get There Now.

List the three places you go most often and how you get there now.

1. Where do you go? _____

Address _____

How often do you go there? _____

How do you get there now? _____

2. Where do you go? _____

Address _____

How often do you go there? _____

How do you get there now? _____

3. Where do you go? _____

Address _____

How often do you go there? _____

How do you get there now? _____

Do you currently use fixed route buses  or "L" trains  at all?

No Yes. Which routes? _____

When was the last time you used fixed route buses or "L" trains? _____

If you used fixed route buses or "L" trains in the past and have stopped using them, please explain why: _____

VI. Signature: Please Complete Box A Unless You are a Minor or Have a Legal Guardian, in Which Case Your Parent or Legal Guardian Should Complete Box B.

A. I understand that the purpose of this application is to determine if I am eligible to use ADA Paratransit Services. I certify that the information provided in this application is true and correct. I understand that falsification of information could result in a loss of ADA Paratransit Services as well as a penalty under the law. I agree to notify the RTA if I no longer need to use ADA Paratransit Services.

(Signature of Applicant) _____ Date _____

B. I understand that the purpose of this application is to determine if the Applicant is eligible to use ADA Paratransit Services. I certify that the information provided in this application is true and correct. I understand that falsification of information could result in a loss of ADA Paratransit Services as well as a penalty under the law. I agree to notify the RTA if the Applicant no longer needs to use ADA Paratransit Services.

I consent to the Applicant's interview and the functional assessment of his/her travel abilities and limitations to determine ADA Paratransit Service eligibility. I understand that the Applicant must be present for the interview and any recommended functional assessment. I acknowledge that I may be present with the Applicant during the interview and any functional assessment, and state that:

(Check one of the following)

- I will be present,
- I designate _____ to be present on my behalf, or
- I waive my right to be present and do not designate another person to be present on my behalf.

(Signature of Parent or Legal Guardian) _____ Date _____

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

Print name _____

Relationship to applicant _____

Address _____

Agency _____ Phone (_____) _____

Once you have completed as much of this form as you can, call the ADA Paratransit Certification program at 312/663-HELP (4357) to schedule an in-person interview. DO NOT MAIL this application back to the RTA.

GO TO THE NEXT PAGE

If We Need Additional Information

In order for the Regional Transportation Authority (RTA) and/or Medical Transportation Management, Inc. (MTM), operating on behalf of the RTA, to evaluate your request for eligibility, it may be helpful for us to contact a professional who is familiar with your health condition or disability and your functional abilities and limitations. Please list one or two professionals who we can contact if we need additional information. Examples of qualified professionals include:

physician (M.D. or D.O.)

physical therapist

occupational therapist

orientation and mobility instructor

independent living specialist

rehabilitation specialist

social worker

registered nurse

ophthalmologist

psychiatrist

psychologist

case manager

(Name of qualified professional)

(Name of qualified professional)

(Type of professional)

(Type of professional)

(Professional's agency)

(Professional's agency)

(Street Address)

(Street Address)

(City, State & Zip Code)

(City, State & Zip Code)

(_____) _____

(Phone Number)

(_____) _____

(Phone Number)

Authorization for Release of Information

I authorize the professional(s) listed above to release to the RTA and/or MTM, operating on behalf of the RTA, information about my disability or health condition and its effect on my ability to travel on the CTA/Pace bus and train system. I understand that I may revoke this authorization at any time. Unless earlier revoked, this form will permit the professional listed to release the information described up to 1 year from the date below.

_____ Date _____
(Signature of Applicant or Responsible Party)

All medical information which you or a professional provide about your disability will be kept strictly confidential.

Attachment D
Paratransit Rider Guides



Pace ADA Paratransit Service

City of Chicago Customer Guide

July 15, 2016

**To request a copy of this guide in an accessible format,
please call Pace Customer Relations at
800-606-1282 / Option 4**

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July 15, 2016

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City of Chicago Service Reservations

Area #1 South – 71st St. south to Sibley

SCR Transportation
866-926-9631

Area #2 Central – between 71st St. and Fullerton

CDT Transportation
866-926-9632

Area #3 North – Fullerton north to Central

MV Transportation
866-926-9633

City of Chicago Only – Trip Status Calls / Where's My Ride?

800-606-1282 / Option 1

Suburban Service Reservations

North Cook County ADA Service

MV Transportation
800-554-7599

West Cook County ADA Service

MV Transportation
800-299-0765

South Cook County ADA Service

MV Transportation
866-248-6868

DuPage County ADA Service

MV Transportation
800-713-7445

Kane County ADA Service

MV Transportation
866-727-6842

North and Central Lake County ADA Service

First Transit
800-201-6446

Southeast Lake County ADA Service

First Transit
800-554-7599

McHenry County ADA Service

First Transit
800-451-4599

Will County ADA Service

First Transit
800-244-4410

Other Important Phone Numbers

Pace Customer Relations (ADA Paratransit)

800-606-1282

Pace Passenger Services (Fixed Route, General Information)

847-364-7223

Email: passenger.services@pacebus.com

Website: www.pacebus.com

RTA Mobility Services Department

312-663-HELP (4357)

ADA Paratransit Visitor Information

312-341-8000

Email: ada.paratransit.visitor@pacebus.com

Chicago Transit Authority (CTA)

888-YOUR-CTA (968-7282)

TTY: 888-282-TTY1 (282-8891)

Welcome to Pace ADA Paratransit

Pace is committed to providing quality public transportation for all of our customers. We recognize that some customers with disabilities are not able to use fixed route bus and rail services for some or all of their trips because of their disability or health condition. Pace's ADA Paratransit Service program provides transportation that is comparable to fixed route service operated by the Chicago Transit Authority (CTA) and Pace Suburban Bus.

ADA Paratransit Service operates:

- In compliance with federal ADA regulations;
- Origin-to-destination service for ADA Paratransit-eligible customers;
- As a shared-ride program and you may be riding with other customers;
- Service that is comparable in travel time to the CTA and Pace fixed-route system, including transfers and wait times; and
- On the same days and during the same hours, and in the same areas, as the fixed route system.

Pace will accommodate customers with mobility devices as long as the lift or ramp can accommodate the size and weight of the customer and his/her mobility device, and the device and customer can fit onto the vehicle. Pace will not be able to accommodate customers and their mobility devices if the combined size and/or weight exceed the capabilities of the vehicle equipment. All securement devices on vehicles in Pace ADA service are installed for passengers to be facing forward.

ADA Paratransit Eligibility

To qualify for ADA Paratransit Service, customers must first apply for eligibility with the Regional Transportation Authority (RTA). The RTA ADA Paratransit Certification Program determines eligibility for complementary paratransit service operated by Pace throughout the region's six-county ADA service area. The process determines which

individuals are eligible to use ADA Paratransit Service for some or all of their trips and which individuals can be served by accessible fixed route bus and rail systems. Individuals who are interested in using ADA Paratransit service must apply and be found eligible according to ADA guidelines.

To apply for ADA Paratransit, call the RTA ADA Paratransit Certification program at 312-663-HELP (4357) between 8:30 a.m. and 5 p.m., Monday through Friday, to request an application.

ADA Paratransit customers must keep their address, telephone numbers, emergency contact information, and mobility aid information current with the RTA since the RTA is the source for passenger information. **The RTA may be reached at 312-663-HELP (4357).**

Scheduling a Trip

To request trips, eligible customers should call the carrier listed in the service area where their trip will begin (see “Contact Numbers” for a list of carriers by service area). Customers should schedule their return trip when they call for their initial trip. Riders are responsible for arranging trips that require a transfer between Suburban and City of Chicago areas or between Suburban areas. Please let your carrier know if you are requesting a transfer.

Reservation requests are taken for travel the following day.

Reservations are accepted from 6 a.m. to 6 p.m., daily, including Holidays. When calling to schedule a trip, customers must have the following information ready:

- Paratransit ID Number (starting with the letter P)
- Date of trip
- Requested pick-up time or appointment time
- Exact street address of the trip origin and destination (intersections will not be accepted)
- Number of people traveling with the customer, including any personal care attendant (PCA) and/or companions (see section on

Personal Care Attendant (PCA) and Companion Policies) and/or service animal

- Types of mobility aids used by all members of party
- Description of any assistance needed
- Other helpful information (for example, whether a customer will be transferring from a wheelchair to a seat, whether door-to-door assistance is needed, etc.)

Although the exact pick-up time requested may not be available, all customers are guaranteed a pick-up time no more than 1 hour before or after the individual's requested pick-up time. For example, if a rider requests a trip with a 9 a.m. pick-up time, the ADA regulations permit the carrier to offer a pick-up time between 8 a.m. and 10 a.m.

This negotiation window, however, is subject to the rider's practical travel needs. Although some trips have flexibility (e.g., shopping or recreation), other trips have constraints with respect to when they can begin. For example, a rider who ends his or her workday at 5 p.m. may requests a 5:15 p.m. pick-up to return home. Offering a pick-up time between 5:15 p.m. and 6:15 p.m. would be appropriate; offering a pick-up time before the requested pick-up time would not be appropriate.

When scheduling a trip, the call-taker will ask the customer if he/she has an appointment time. Passengers should allow enough time to get from the vehicle to the actual appointment. For example, if a passenger has to be at work or has a medical appointment at 9 a.m. and needs 15 minutes to get to their work area or get signed in, the appointment time should be 8:45 a.m. Customers cannot request both a pick-up time and an appointment time; they have to request one or the other

A customer may call back to change their return trip pick-up time if an appointment runs late. If the appointment is expected to end early, Pace will try to accommodate the change. The return time will be subject to vehicle availability if the trip was not scheduled the previous day. Pace has a no-strand policy and guarantees a ride home to all passengers transported by Pace on the same day of service.

Canceling or Changing a Trip Reservation

Same-day trip changes will only be permitted if proper notice is provided and the carrier's schedule can accommodate the desired change. Destination changes are not permitted while on board the vehicle or at the time of pick up unless authorized by the dispatcher. Drivers are not permitted to make any changes to a trip.

Customers who need to cancel a trip should call their carrier as soon as possible. Customers must cancel their trip at least 2 hours before the scheduled pick-up time to avoid the trip being classified as a late-canceled trip.

Pick-up and Drop-off Procedures

Customers should allow for a 20-minute pick-up window based on their scheduled pick-up time. For example, if a ride is scheduled for a 9 a.m. pick-up, the vehicle may arrive between 9 a.m. and 9:20 a.m. to be considered on-time.

Customers should be within sight of the vehicle while awaiting pick up. Passengers are asked to be ready to board the vehicle 5 minutes before their pick-up time. Drivers will wait 5 minutes after arriving or 5 minutes after the pick-up time, whichever is later. After that period the driver will be given authorization to leave. Before leaving, the carrier will attempt to contact the customer. However, if the driver leaves after the appropriate 5-minute waiting period, the customer will be recorded as a no show.

When boarding a vehicle, customers must show either a valid RTA ADA Paratransit certification ID card or another valid photo ID card. All fares must be paid upon boarding the vehicle. Exact fare is required; drivers cannot make change.

Personal Care Attendant (PCA) and Companion Policies

As defined in the ADA regulations, a personal care attendant (PCA) is "someone designated or employed specifically to help the eligible individual meet his or her personal needs." A PCA typically assists with

one or more daily life activities such as providing personal care, performing manual tasks or providing assistance with mobility or communication.

Pace permits one PCA to ride with an ADA eligible customer if the customer has been certified by the RTA to ride with a PCA.

A customer also may ride with one companion, such as a friend or family member. Additional companions may ride with the customer only if space is available on the vehicle at the time the reservation is made.

Customers traveling with a PCA and/or companion must reserve space for them when calling to schedule their own ride and all riders traveling together must have the same pick-up and drop-off locations. A PCA will not be charged a fare; however, all companions are required to pay the same cash fare as the ADA Paratransit eligible customer.

Driver Assistance

Customers should request assistance when they make their reservation. However, customers also may also request assistance at the time of pick-up and or drop-off. Drivers will assist customers with boarding and exiting the vehicle, and to/from the ground-level exterior door of the building. Drivers will provide assistance up/down two steps to/from a building if it is safe to do so. Drivers are required to make sure that all wheelchairs and scooters are properly secured per Pace requirements. Drivers are not allowed to lift or carry customers.

Drivers cannot escort customers past the ground floor of any building and are not allowed to enter residences. They are required to maintain a visual sight line of their vehicle at all times. Customers are expected to carry their own bags and packages. Customers are responsible for ensuring that the path of travel between their exterior door and the vehicle pick-up/drop-off area are clear of snow and other obstacles.

Drivers are not allowed to accept tips from passengers, although passengers may contact Pace Passenger Services to compliment and/or comment on a driver. Customers who require additional assistance

beyond what is provided by a driver are encouraged to arrange for a PCA or companion to travel with them.

Visually impaired passengers may request to be identified as visually impaired if they want the driver to announce their name upon arriving. Drivers will go to the ground level exterior door of the building upon request when it is safe to do so. Drivers will identify themselves to visually impaired passengers and announce the name(s) of the passenger(s) being picked up.

Travel Time

ADA Paratransit Service is a shared-ride program. Total travel time includes the time it takes other passengers to board, ride, and alight the vehicle. Paratransit travel time is comparable to trips with the same origin and destination taken on the fixed-route bus system, including transfers and wait times.

Customers who are traveling to a scheduled appointment should tell the call-taker their appointment time when calling to schedule the ride. Be sure to include enough time to travel from the drop-off location to your appointment. The carrier will determine the pick-up time. Customers cannot request both a pick-up time and an appointment time; they have to request one or the other.

Fares

ADA Paratransit Fare

Each customer and companion is required to pay a fare upon boarding. The fare is paid in cash or with a Pace ADA One-Ride Ticket. Exact fare is required; drivers cannot make change. A PCA approved to ride with a customer rides for free.

Service Hours

ADA Paratransit service is provided during the hours and days that fixed route service is available in the same area. If a rider is uncertain whether ADA Paratransit service is available at a specific time, he/she should

contact the carrier operating in the area where they wish to travel (see section on Contact Numbers).

Holiday Service

Paratransit Service on the following holidays is comparable to fixed route holiday service:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day

All subscription rides are automatically canceled on the above holidays. Customers who wish to ride on these days must book a demand trip the day before with the appropriate area carrier.

Service Area

The Pace ADA Paratransit service area is within three-quarters (3/4) of a mile of a CTA or Pace bus route and within a radius of three-quarter (3/4) mile around CTA rail stations. Service also is provided to the transfer locations listed under "Suburban Trips and Transfer Locations."

Paratransit Transfer Locations

Customers can travel between Suburban and City locations outside their home service area by calling the carrier that provides the first trip and then calling the carrier that will meet the vehicle to continue the trip to the final destination. When reserving rides, be sure to tell both carriers that the trip is a transfer trip. When transferring, please ask for a transfer slip before exiting the vehicle.

Suburban-to-Suburban Transfer Points

North Cook

- North Cook to West Cook – CTA Rosemont Blue Line L Station – 5800 N. River Rd.

South Cook

- South Cook to West Cook – MacNeal Hospital – 3249 Oak Park Ave., Berwyn
- South Cook to Will County – Walgreens – 143rd & Will Cook Rd., Orland Park

West Cook

- West Cook to North Cook – CTA Rosemont Blue Line L Station – 5800 N. River Rd.
- West Cook to South Cook – MacNeal Hospital – 3249 Oak Park Ave., Berwyn
- West Cook to DuPage County – Oakbrook Mall (100 Oakbrook Ct., in front of Macy's, Oakbrook) & Elmhurst Hospital (155 E. Brush Hill Rd., Elmhurst)

(Please note that there is a small area of ADA service in Naperville that is not connected to this transfer point and may only be reached using Metra.)

DuPage County

- DuPage County to West Cook – Oakbrook Mall (100 Oakbrook Ct., in front of Macy's, Oakbrook) & Elmhurst Hospital (155 E. Brush Hill Rd., Elmhurst)

(Please note that there is a small area of ADA service in Naperville that is not connected to this transfer point and may only be reached using Metra.)

- DuPage County to Kane County – Thomas' Barbecue (1955 E. New York St., Aurora) & Charlestowne Mall (3800 E. Main St., St. Charles)
- DuPage County ADA to Will County ADA – 83rd St. & Janes Ave., Woodridge

Kane County

- Kane County to DuPage County – Thomas’ Barbecue (1955 E. New York St., Aurora) & Charlestowne Mall (3800 E. Main St., St. Charles)

Lake County

- Lake County to McHenry County – Fox Lake Metra Station (limited hours) – Nippersink Blvd. & Grand Ave.

McHenry County

- McHenry County to Lake County – Fox Lake Metra Station (limited hours) – Nippersink Blvd. & Grand Ave.

Will County

- Will County to South Cook – Walgreens – 143rd & Will Cook Rd., Orland Park
- Will County ADA to DuPage County ADA – 83rd St. & Janes Ave., Woodridge

City Transfer Points

North

- CTA Linden Purple Line L Station – 349 Linden Ave., Wilmette
- CTA Rosemont Blue Line L Station – 5800 N. River Rd., Rosemont
- CTA Howard Red Line Rail Station – 1649 W. Howard, Howard and N. Hermitage, Chicago
- Park Ridge Metra Station – 100 S. Summit Ave., Park Ridge
- Golf Mill Shopping Center (East side entrance to Food Court) – Milwaukee Ave. and Golf Rd., Niles
- Old Orchard (entrance to the West of Macy’s) – 1 Old Orchard Rd., Skokie
- Advocate Lutheran General Hospital (Main entrance off Luther Lane on West side of facility) – 1775 Dempster St., Park Ridge

West

- Brookfield Zoo (use North entrance of zoo located on South side of 31st, West of 1st Ave.) – 3300 Golf Rd., Brookfield

- Hines VA Hospital (at Pace Paratransit sign at entrance to Building 200 main entrance off Roosevelt Rd.) – 5000 S. 5th Ave., Maywood
- Loyola Hospital (behind Niehoff building) – 2160 S. 1st Ave., Maywood
- MacNeal Hospital – 3249 Oak Park Ave., Berwyn
- North Riverside Mall (use Food Court entrance) – 7501 W. Cermak Rd., North Riverside
- West Suburban Hospital – 518 N. Austin Blvd., Oak Park

Southwest

- Ford City Mall (pick up and drop off must be at Food Court entrance) – 7601 S. Cicero Ave., Chicago

South

- Chicago Ridge Mall (use entrance on East side of mall adjacent to Panera Bread) – 281 Commons Drive, Chicago Ridge
- Ford City Mall (pick up and drop off must be at Food Court entrance) – 7601 S. Cicero Ave., Chicago
- River Oaks Mall (North side of Sears in parking lot; there is a Pace bus stop sign)– 2 River Oaks Drive, Calumet City
- CTA Orange Line Rail Station – 5900 S. Kilpatrick Ave., Chicago

Transfers Between ADA Paratransit and Pace Fixed Route

Riders may transfer between ADA Paratransit and Pace fixed route bus service. Upon boarding the ADA Paratransit vehicle, the rider must tell the driver he/she will be transferring to Pace fixed route bus service. The rider will pay the ADA Paratransit fare and the applicable transfer fare. The Paratransit driver will issue two “Transfer Vouchers.” The first Transfer Voucher will be used to board the Pace fixed route bus. The second Transfer Voucher will be used when boarding the ADA Paratransit vehicle on the return trip. Note that the rider also must pay the applicable fare when boarding Pace fixed route bus service for the return trip.

If travel begins on Pace fixed route, the rider will be required to pay the appropriate fare for the fixed route bus and for the ADA Paratransit service. Fixed route drivers cannot provide Transfer Vouchers.

Subscription Service

Subscription Service is not required by the ADA. However, in an effort to best meet our customers' needs, Pace offers limited Subscription Service for customers who require repetitive trips from the same origin and to the same destination over an extended period of time.

Subscription Service is for trips to work, work training, education-specialized medical care or other repetitive travel needs. In order to qualify for a Subscription trip, the same ride must be taken at the same time at least twice a week. Subscription Service customers do not need to call to reserve each of their repeat trips.

Because the availability of Subscription Service is limited, some customers may be placed on a waiting list. Other restrictions also may apply. All subscription rides are automatically canceled on the holidays listed in the section "Holiday Service." Customers who wish to ride on these days must book a demand trip the day before with the appropriate area carrier.

Subscription Service trips requiring changes should be canceled and demand trips should be requested. Customers must call the carrier to cancel a specific trip that is a part of Subscription Service. Customers should take care to only cancel one specific trip and not cancel their Subscription Service entirely. **Failure to cancel trips appropriately and/or excessive cancellations may result in dismissal from the Subscription Service Program.**

Eligibility or mobility changes should be updated with the Pace Subscription Department. Subscription Service may be placed on hold to accommodate vacations, hospital stays, and other limited periods of time when service will not be needed. Subscription Service is not meant to hold a time slot for trips made only occasionally. Pace may assign Subscription trips to any one of its contract carriers.

Suspension of Service

Customers who abuse their riding privileges may face suspension of ADA Paratransit Service. Before service is suspended, customers will be notified in writing. Conduct that may lead to suspension of service includes refusal to pay the proper fare, disruptive or unsafe conduct, and excessive late cancellations and/or no shows.

Disruptive Conduct

Customers who engage in violent, disruptive or illegal conduct will be refused service. A customer whose behavior threatens or has threatened the safety of Paratransit personnel or other customers may be denied service. Customers who engage in violent, threatening, or illegal behavior may lose the privilege of riding with Pace Paratransit.

Passenger No Show/Late Cancellation Policy

No Shows

In order for a passenger no show to be recorded, all of the following conditions must be met:

1. The rider must have a scheduled ADA Paratransit trip.
2. The driver must arrive at the scheduled pick-up point not later than 20 minutes after the scheduled pick-up time.
3. The driver must wait at least 5 full minutes beyond the scheduled pick-up time or 5 full minutes beyond the time the vehicle arrives, whichever is later, and the rider fails to approach the vehicle.

Each leg of a rider's trip will be treated separately. If a rider misses a scheduled pick up, Pace will not cancel that rider's return trip. If the client does not appear for that return trip, that incident will be counted as a second no show. A rider will be counted as a no show for each leg of any trip for which they fail to cancel and do not appear.

Pace will not penalize a rider for a no show or late cancellation beyond the rider's control or due to carrier error. For example, if a medical appointment runs later than anticipated, or a customer is unable to cancel

an early morning pick up 2 hours in advance due to a power outage, the rider will not be penalized. **If you feel that you have been mistakenly assessed as a no show, please contact Pace Customer Relations at 800-606-1282 / Option 2.**

Late Cancellations

A late cancellation occurs when a rider cancels a reservation, but fails to do so 2 or more hours prior to the scheduled pick-up time of the ride. Pick-up locations can be moved within 2 blocks of the pick up if the facility is closing and the person cannot wait there any longer. The carrier must be informed of the new address.

Pace will not penalize a rider for a late cancellation that is beyond the rider's control, such as an appointment canceled by a medical provider without sufficient notice to the rider.

Passenger No Shows and Late Cancellations Penalties

Pace will track scheduled trips, no shows, and late cancellations by rider. Pace will identify riders who, within a 30-day period, have no shows and late cancellations that meet both of the following criteria:

- No shows/late cancellations represent 10% or more of the rider's scheduled trips and
- The rider has 3 or more no shows.

Each late cancellation will be counted as one-half (1/2) of 1 no show for the purposes of this policy.

Riders who meet the above criteria will be in violation of the no show/late cancellation policy. Riders will not be penalized for no shows or late cancellations due to circumstances beyond their control or due to carrier error.

When a rider violates the no-show/late cancellation policy, the following progressive action will be taken:

1. First violation – a warning letter is issued advising the rider that he/she has violated Pace's no-show/late cancellation policy.

2. Second violation within a 30-day period – a second warning letter is issued.
3. Third violation within a 30-day period – rider receives a 7-day suspension.
4. Fourth violation within a 30-day period – rider receives a 14-day suspension.
5. Additional violations within a 30-day period – rider receives a 30-day suspension.

Riders with questions regarding no show warning letters or riders who feel that a no show/late cancellation was beyond their control or a result of carrier error, are encouraged to call the Pace Quality Assurance Department at 312-341-8000. Customers who contact Pace to challenge no shows/late cancellations will be provided with a form to complete and submit. Pace will investigate the customer's challenge using GPS vehicle tracking technologies to determine if the challenge is valid.

Appealing a Suspension

A rider who receives a suspension notice may file an appeal of Pace's decision to suspend his/her services. Enclosed with the suspension notice will be a copy of the Appeal Procedure for Suspension of Paratransit Services. If an appeal is filed, Pace will continue to provide service to the rider (unless there is a serious public or personal safety-related issue) until the appeal hearing is heard and decided. Appeals will be heard by a person or panel of people uninvolved with the initial decision to suspend service. Prior to passenger hearings, Pace will investigate the rider's appeal using computer and GPS vehicle tracking technologies to assist in determining the validity of challenges to no shows.

Visitors to the City of Chicago and Suburbs

Pace will provide ADA Paratransit Service for visitors with disabilities who reside outside the six-county RTA service area. Out-of-town visitors should request eligibility for Pace ADA Paratransit Service at least 7 days before the first desired day of travel.

- Visitors who already have ADA paratransit eligibility from another transit agency need to contact Pace and provide proof of eligibility, such as a valid ADA Paratransit ID card or a letter from the transit agency that certified the person's ADA paratransit eligibility.
- Visitors who do not have ADA paratransit eligibility with another transit agency must provide documentation of place of residence (such as a driver's license or state ID card) and a statement that they have a disability and are unable to use fixed route service. Additional documentation may be required if the disability is not apparent.

Once registered with Pace, visitors will be able to use the service for any combination of 21 days during a 365-day period beginning with the visitor's first use of the service. Visitors wishing to use ADA Paratransit service more than 21 days during a 365-day period must apply and be found eligible for ADA Paratransit through the RTA's ADA Paratransit Certification Program. **For more information about ADA Paratransit visitor eligibility, please contact Pace at: 312-341-8000 or by email at ada.paratransit.visitor@pacebus.com.**

Using Fixed Route Bus and Rail Services

The RTA ADA Paratransit ID card enables an ADA-eligible customer and one PCA or companion traveling with them to ride on the CTA, Pace and Metra bus and rail systems at the reduced fare rate. Both riders are required to pay a fare. **For more information on using fixed route services, visit rtachicago.org/plan-your-trip or call the RTA Travel Information Center at 312-836-7000.**

RTA Travel Training Program

The RTA Travel Training Program teaches individuals with disabilities and older adults how to use CTA, Metra and Pace buses and trains. Travel Training is free except for the cost of transit fares during training sessions. RTA offers three types of training, depending on the individual's needs:

1. Trip Training
2. Individual Transit Orientation
3. Group Transit Orientation

To sign up for Travel Training or to request a Group Transit Orientation presentation, call the RTA at (312) 663-4357 or by email at: traveltraining@rtachicago.org.

Commendations, Complaints or Questions

Pace is committed to operating high quality service in compliance with ADA Paratransit service requirements. **Please contact Pace Customer Relations at 800-606-1282 / Option 2 if you have any commendations, complaints or questions regarding Pace ADA Paratransit Service.**

Thank you for riding with Pace!

Immediate Assistance

**If a passenger believes he/she has been stranded
Call: 800-606-1282 / Option 3**

**For life-threatening and medical emergencies
Call: 911**

Pace Paratransit Operations

547 W. Jackson Blvd.
10th Floor
Chicago, IL 60661



Pace ADA Paratransit Service

Suburban Chicago Customer Guide

July 15, 2016

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Email: passenger.services@pacebus.com

Website: www.pacebus.com

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Pace will accommodate customers with mobility devices as long as the lift or ramp can accommodate the size and weight of the customer and his/her mobility device, and the device and customer can fit onto the vehicle. Pace will not be able to accommodate customers and their mobility devices if the combined size and/or weight exceed the capabilities of the vehicle equipment. All securement devices on vehicles in Pace ADA service are installed for passengers to be facing forward.

ADA Paratransit Eligibility

To qualify for ADA Paratransit Service, customers must first apply for eligibility with the Regional Transportation Authority (RTA). The RTA ADA Paratransit Certification Program determines eligibility for complementary paratransit service operated by Pace throughout the region's six-county ADA service area. The process determines which

individuals are eligible to use ADA Paratransit Service for some or all of their trips and which individuals can be served by accessible fixed route bus and rail systems. Individuals who are interested in using ADA Paratransit service must apply and be found eligible according to ADA guidelines.

To apply for ADA Paratransit, call the RTA ADA Paratransit Certification program at 312-663-HELP (4357) between 8:30 a.m. and 5 p.m., Monday through Friday, to request an application.

ADA Paratransit customers must keep their address, telephone numbers, emergency contact information, and mobility aid information current with the RTA since the RTA is the source for passenger information. **The RTA may be reached at 312-663-HELP (4357).**

Scheduling a Trip

To request trips, eligible customers should call the carrier listed in the service area where their trip will begin (see “Contact Numbers” for a list of carriers by service area). Customers should schedule their return trip when they call for their initial trip. Riders are responsible for arranging trips that require a transfer between Suburban and City of Chicago areas or between Suburban areas. Please let your carrier know if you are requesting a transfer.

Reservation requests are taken for travel the following day.

Reservations are accepted from 6 a.m. to 6 p.m., Monday through Friday, and from 8 a.m. to 5 p.m. on Saturdays, Sundays and Holidays. When calling to schedule a trip, customers must have the following information ready:

- Paratransit ID Number (starting with the letter P)
- Date of trip
- Requested pick-up time or appointment time
- Exact street address of the trip origin and destination (intersections will not be accepted)
- Number of people traveling with the customer, including any personal care attendant (PCA) and/or companions (see section on

Personal Care Attendant (PCA) and Companion Policies) and/or service animal

- Types of mobility aids used by all members of party
- Description of any assistance needed
- Other helpful information (for example, whether a customer will be transferring from a wheelchair to a seat, whether door-to-door assistance is needed, etc.)

Although the exact pick-up time requested may not be available, all customers are guaranteed a pick-up time no more than 1 hour before or after the individual's requested pick-up time. For example, if a rider requests a trip with a 9 a.m. pick-up time, the ADA regulations permit the carrier to offer a pickup time between 8 a.m. and 10 a.m.

This negotiation window, however, is subject to the rider's practical travel needs. Although some trips have flexibility (e.g., shopping or recreation), other trips have constraints with respect to when they can begin. For example, a rider who ends his or her workday at 5 p.m. may requests a 5:15 p.m. pick-up to return home. Offering a pick-up time between 5:15 p.m. and 6:15 p.m. would be appropriate; offering a pick-up time before the requested pick-up time would not be appropriate.

When scheduling a trip, the call-taker will ask the customer if he/she has an appointment time. Passengers should allow enough time to get from the vehicle to the actual appointment. For example, if a passenger has to be at work or has a medical appointment at 9 a.m. and needs 15 minutes to get to their work area or get signed in, the appointment time should be 8:45 a.m. Customers cannot request both a pick-up time and an appointment time; they have to request one or the other.

A customer may call back to change their return trip pick-up time if an appointment runs late. If the appointment is expected to end early, Pace will try to accommodate the change. The return time will be subject to vehicle availability if the trip was not scheduled the previous day. Pace has a no-strand policy and guarantees a ride home to all passengers transported by Pace on the same day of service.

Canceling or Changing a Trip Reservation

Same-day trip changes will only be permitted if proper notice is provided and the carrier's schedule can accommodate the desired change. Destination changes are not permitted while on board the vehicle or at the time of pick up unless authorized by the dispatcher. Drivers are not permitted to make any changes to a trip.

Customers who need to cancel a trip should call their carrier as soon as possible. Customers must cancel their trip at least 2 hours before the scheduled pick-up time to avoid the trip being classified as a late-canceled trip.

Pick-up and Drop-off Procedures

Customers should allow for a 15-minute pick-up window based on their scheduled pick-up time. For example, if a ride is scheduled for a 9 a.m. pick-up, the vehicle may arrive between 9 a.m. and 9:15 a.m. to be considered on-time.

Customers should be within the line-of-sight of the vehicle while awaiting pick up. Passengers are asked to be ready to board the vehicle 5 minutes before their pick-up time. Drivers will wait 5 minutes after arriving or 5 minutes after the pick-up time, whichever is later. After that period the driver will be given authorization to leave. Before leaving, the carrier will attempt to contact the customer. However, if the driver leaves after the appropriate 5-minute waiting period, the customer will be recorded as a no show.

When boarding a vehicle, customers must show either a valid RTA ADA Paratransit certification ID card or another valid photo ID card. All fares must be paid upon boarding the vehicle. Exact fare is required; drivers cannot make change.

Personal Care Attendant (PCA) and Companion Policies

As defined in the ADA regulations, a personal care attendant (PCA) is "someone designated or employed specifically to help the eligible individual meet his or her personal needs." A PCA typically assists with

one or more daily life activities such as providing personal care, performing manual tasks or providing assistance with mobility or communication.

Pace permits one PCA to ride with an ADA eligible customer if the customer has been certified by the RTA to ride with a PCA.

A customer also may ride with one companion, such as a friend or family member. Additional companions may ride with the customer only if space is available on the vehicle at the time the reservation is made.

Customers traveling with a PCA and/or companion must reserve space for them when calling to schedule their own ride and all riders traveling together must have the same pick-up and drop-off locations. A PCA will not be charged a fare; however, all companions are required to pay the same cash fare as the ADA Paratransit eligible customer.

Driver Assistance

Customers should request assistance when they make their reservation. However, customers also may also request assistance at the time of pick-up and or drop-off. Drivers will assist customers with boarding and exiting the vehicle, and to/from the ground-level exterior door of the building. Drivers will provide assistance up/down two steps to/from a building if it is safe to do so. Drivers are required to make sure that all wheelchairs and scooters are properly secured per Pace requirements. Drivers are not allowed to lift or carry customers.

Drivers cannot escort customers past the ground floor of any building and are not allowed to enter residences. They are required to maintain a visual sight line of their vehicle at all times. Customers are expected to carry their own bags and packages. Customers are responsible for ensuring that the path of travel between their exterior door and the vehicle pick-up/drop-off area are clear of snow and other obstacles.

Drivers are not allowed to accept tips from passengers, although passengers may contact Pace Passenger Services to compliment and/or comment on a driver. Customers who require additional assistance

beyond what is provided by a driver are encouraged to arrange for a PCA or companion to travel with them.

Visually impaired passengers may request to be identified as visually impaired if they want the driver to announce their name upon arriving. Drivers will go to the ground level exterior door of the building upon request when it is safe to do so. Drivers will identify themselves to visually impaired passengers and announce the name(s) of the passenger(s) being picked up.

Travel Time

ADA Paratransit Service is a shared-ride program. Total travel time includes the time it takes other passengers to board, ride, and alight the vehicle. Paratransit travel time is comparable to trips with the same origin and destination taken on the fixed-route bus system, including transfers and wait times.

Customers who are traveling to a scheduled appointment should tell the call-taker their appointment time when calling to schedule the ride. Be sure to include enough time to travel from the drop-off location to your appointment. The carrier will determine the pick-up time. Customers cannot request both a pick-up time and an appointment time; they have to request one or the other.

Fares

ADA Paratransit Fare

Each customer and companion is required to pay a fare upon boarding. The fare is paid in cash or with a Pace ADA One-Ride Ticket. Exact fare is required; drivers cannot make change. A PCA approved to ride with a customer rides for free.

Service Hours

ADA Paratransit service is provided during the hours and days that fixed route service is available in the same area. If a rider is uncertain whether ADA Paratransit service is available at a specific time, he/she should

contact the carrier operating in the area where they wish to travel (see section on Contact Numbers).

Holiday Service

Paratransit Service on the following holidays is comparable to fixed route holiday service:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day

All subscription rides are automatically canceled on the above holidays. Customers who wish to ride on these days must book a demand trip the day before with the appropriate area carrier.

Service Area

The Pace ADA Paratransit service area is within three-quarters (3/4) of a mile of a CTA or Pace bus route and within a radius of three-quarter (3/4) mile around CTA rail stations. Service also is provided to the transfer locations listed under "Suburban Trips and Transfer Locations."

Paratransit Transfer Locations

Customers can travel between Suburban and City locations outside their home service area by calling the carrier that provides the first trip and then calling the carrier that will meet the vehicle to continue the trip to the final destination. When reserving rides, be sure to tell both carriers that the trip is a transfer trip. When transferring, please ask for a transfer slip before exiting the vehicle.

Suburban-to-Suburban Transfer Points

North Cook

- North Cook to West Cook – CTA Rosemont Blue Line L Station – 5800 N. River Rd.

South Cook

- South Cook to West Cook – MacNeal Hospital – 3249 Oak Park Ave., Berwyn
- South Cook to Will County – Walgreens – 143rd & Will Cook Rd., Orland Park

West Cook

- West Cook to North Cook – CTA Rosemont Blue Line L Station – 5800 N. River Rd.
- West Cook to South Cook – MacNeal Hospital – 3249 Oak Park Ave., Berwyn
- West Cook to DuPage County – Oakbrook Mall (100 Oakbrook Ct., in front of Macy's, Oakbrook) & Elmhurst Hospital (155 E. Brush Hill Rd, Elmhurst)

(Please note that there is a small area of ADA service in Naperville that is not connected to this transfer point and may only be reached using Metra.)

DuPage County

- DuPage County to West Cook – Oakbrook Mall (100 Oakbrook Ct., in front of Macy's, Oakbrook) & Elmhurst Hospital (155 E. Brush Hill Rd., Elmhurst)

(Please note that there is a small area of ADA service in Naperville that is not connected to this transfer point and may only be reached using Metra.)

- DuPage County to Kane County – Thomas' Barbecue (1955 E. New York St., Aurora) & Charlestowne Mall (3800 E. Main St., St. Charles)
- DuPage County ADA to Will County ADA – 83rd St. & Janes Ave., Woodridge

Kane County

- Kane County to DuPage County – Thomas’ Barbecue (1955 E. New York St., Aurora) & Charlestowne Mall (3800 E. Main St., St. Charles)

Lake County

- Lake County to McHenry County – Fox Lake Metra Station (limited hours) – Nippersink Blvd. & Grand Ave.

McHenry County

- McHenry County to Lake County – Fox Lake Metra Station (limited hours) – Nippersink Blvd. & Grand Ave.

Will County

- Will County to South Cook – Walgreens – 143rd & Will Cook Rd., Orland Park
- Will County ADA to DuPage County ADA – 83rd St. & Janes Ave., Woodridge

City Transfer Points

North

- CTA Linden Purple Line L Station – 349 Linden Ave., Wilmette
- CTA Rosemont Blue Line L Station – 5800 N. River Rd., Rosemont
- CTA Howard Red Line Rail Station – 1649 W. Howard, Howard and N. Hermitage, Chicago
- Park Ridge Metra Station – 100 S. Summit Ave., Park Ridge
- Golf Mill Shopping Center (East side entrance to Food Court) – Milwaukee Ave. and Golf Rd., Niles
- Old Orchard (entrance to the West of Macy’s) – 1 Old Orchard Rd., Skokie
- Advocate Lutheran General Hospital (Main entrance off Luther Lane on West side of facility) – 1775 Dempster St., Park Ridge

West

- Brookfield Zoo (use North entrance of zoo located on South side of 31st, West of 1st Ave.) – 3300 Golf Rd., Brookfield

- Hines VA Hospital (at Pace Paratransit sign at entrance to Building 200 main entrance off Roosevelt Rd.) – 5000 S. 5th Ave., Maywood
- Loyola Hospital (behind Niehoff building) – 2160 S. 1st Ave., Maywood
- MacNeal Hospital – 3249 Oak Park Ave., Berwyn
- North Riverside Mall (use Food Court entrance) – 7501 W. Cermak Rd., North Riverside
- West Suburban Hospital – 518 N. Austin Blvd., Oak Park

Southwest

- Ford City Mall (pick up and drop off must be at Food Court entrance) – 7601 S. Cicero Ave., Chicago

South

- Chicago Ridge Mall (use entrance on East side of mall adjacent to Panera Bread) – 281 Commons Drive, Chicago Ridge
- Ford City Mall (pick up and drop off must be at Food Court entrance) – 7601 S. Cicero Ave., Chicago
- River Oaks Mall (North side of Sears in parking lot; there is a Pace bus stop sign)– 2 River Oaks Drive, Calumet City
- CTA Orange Line Rail Station – 5900 S. Kilpatrick Ave., Chicago

Transfers Between ADA Paratransit and Pace Fixed Route

Riders may transfer between ADA Paratransit and Pace fixed route bus service. Upon boarding the ADA Paratransit vehicle, the rider must tell the driver he/she will be transferring to Pace fixed route bus service. The rider will pay the ADA Paratransit fare and the applicable transfer fare. The Paratransit driver will issue two “Transfer Vouchers.” The first Transfer Voucher will be used to board the Pace fixed route bus. The second Transfer Voucher will be used when boarding the ADA Paratransit vehicle on the return trip. Note that the rider also must pay the applicable fare when boarding Pace fixed route bus service for the return trip.

If travel begins on Pace fixed route, the rider will be required to pay the appropriate fare for the fixed route bus and for the ADA Paratransit service. Fixed route drivers cannot provide Transfer Vouchers.

Subscription Service

Subscription Service is not required by the ADA. However, in an effort to best meet our customers' needs, Pace offers limited Subscription Service for customers who require repetitive trips from the same origin and to the same destination over an extended period of time.

Subscription Service is for trips to work, work training, education-specialized medical care or other repetitive travel needs. In order to qualify for a Subscription trip, the same ride must be taken at the same time at least twice a week. Subscription Service customers do not need to call to reserve each of their repeat trips.

Because the availability of Subscription Service is limited, some customers may be placed on a waiting list. Other restrictions also may apply. All subscription rides are automatically canceled on the holidays listed in the section "Holiday Service." Customers who wish to ride on these days must book a demand trip the day before with the appropriate area carrier.

Subscription Service trips requiring changes should be canceled and demand trips should be requested. Customers must call the carrier to cancel a specific trip that is a part of Subscription Service. Customers should take care to only cancel one specific trip and not cancel their Subscription Service entirely. **Failure to cancel trips appropriately and/or excessive cancellations may result in dismissal from the Subscription Service Program.**

Eligibility or mobility changes should be updated with the Pace Subscription Department. Subscription Service may be placed on hold to accommodate vacations, hospital stays, and other limited periods of time when service will not be needed. Subscription Service is not meant to hold a time slot for trips made only occasionally. Pace may assign Subscription trips to any one of its contract carriers.

Suspension of Service

Customers who abuse their riding privileges may face suspension of ADA Paratransit Service. Before service is suspended, customers will be notified in writing. Conduct that may lead to suspension of service includes refusal to pay the proper fare, disruptive or unsafe conduct, and excessive late cancellations and/or no shows.

Disruptive Conduct

Customers who engage in violent, disruptive or illegal conduct will be refused service. A customer whose behavior threatens or has threatened the safety of Paratransit personnel or other customers may be denied service. Customers who engage in violent, threatening, or illegal behavior may lose the privilege of riding with Pace Paratransit.

Passenger No Show/Late Cancellation Policy

No Shows

In order for a passenger no show to be recorded, all of the following conditions must be met:

1. The rider must have a scheduled ADA Paratransit trip.
2. The driver must arrive at the scheduled pick-up point not later than 15 minutes after the scheduled pick-up time.
3. The driver must wait at least 5 full minutes beyond the scheduled pick-up time or 5 full minutes beyond the time the vehicle arrives, whichever is later, and the rider fails to approach the vehicle.

Each leg of a rider's trip will be treated separately. If a rider misses a scheduled pick up, Pace will not cancel that rider's return trip. If the client does not appear for that return trip, that incident will be counted as a second no show. A rider will be counted as a no show for each leg of any trip for which they fail to cancel and do not appear.

Pace will not penalize a rider for a no show or late cancellation beyond the rider's control or due to carrier error. For example, if a medical appointment runs later than anticipated, or a customer is unable to cancel

an early morning pick up 2 hours in advance due to a power outage, the rider will not be penalized. **If you feel that you have been mistakenly assessed as a no show, please contact Pace Customer Relations at 800-606-1282 / Option 2.**

Late Cancellations

A late cancellation occurs when a rider cancels a reservation, but fails to do so 2 or more hours prior to the scheduled pick-up time of the ride. Pick-up locations can be moved within 2 blocks of the pick up if the facility is closing and the person cannot wait there any longer. The carrier must be informed of the new address.

Pace will not penalize a rider for a late cancellation that is beyond the rider's control, such as an appointment canceled by a medical provider without sufficient notice to the rider.

Passenger No Shows and Late Cancellations Penalties

Pace will track scheduled trips, no shows, and late cancellations by rider. Pace will identify riders who, within a 30-day period, have no shows and late cancellations that meet both of the following criteria:

- No shows/late cancellations represent 10% or more of the rider's scheduled trips and
- The rider has 3 or more no shows.

Each late cancellation will be counted as one-half (1/2) of 1 no show for the purposes of this policy.

Riders who meet the above criteria will be in violation of the no show/late cancellation policy. Riders will not be penalized for no shows or late cancellations due to circumstances beyond their control or due to carrier error.

When a rider violates the no-show/late cancellation policy, the following progressive action will be taken:

1. First violation – a warning letter is issued advising the rider that he/she has violated Pace's no-show/late cancellation policy.

2. Second violation within a 30-day period – a second warning letter is issued.
3. Third violation within a 30-day period – rider receives a 7-day suspension.
4. Fourth violation within a 30-day period – rider receives a 14-day suspension.
5. Additional violations within a 30-day period – rider receives a 30-day suspension.

Riders with questions regarding no show warning letters or riders who feel that a no show/late cancellation was beyond their control or a result of carrier error, are encouraged to call the Pace Quality Assurance Department at 312-341-8000. Customers who contact Pace to challenge no shows/late cancellations will be provided with a form to complete and submit. Pace will investigate the customer's challenge using GPS vehicle tracking technologies to determine if the challenge is valid.

Appealing a Suspension

A rider who receives a suspension notice may file an appeal of Pace's decision to suspend his/her services. Enclosed with the suspension notice will be a copy of the Appeal Procedure for Suspension of Paratransit Services. If an appeal is filed, Pace will continue to provide service to the rider (unless there is a serious public or personal safety-related issue) until the appeal hearing is heard and decided. Appeals will be heard by a person or panel of people uninvolved with the initial decision to suspend service. Prior to passenger hearings, Pace will investigate the rider's appeal using computer and GPS vehicle tracking technologies to assist in determining the validity of challenges to no shows.

Visitors to the City of Chicago and Suburbs

Pace will provide ADA Paratransit Service for visitors with disabilities who reside outside the six-county RTA service area. Out-of-town visitors should request eligibility for Pace ADA Paratransit Service at least 7 days before the first desired day of travel.

- Visitors who already have ADA paratransit eligibility from another transit agency need to contact Pace and provide proof of eligibility, such as a valid ADA Paratransit ID card or a letter from the transit agency that certified the person's ADA paratransit eligibility.
- Visitors who do not have ADA paratransit eligibility with another transit agency must provide documentation of place of residence (such as a driver's license or state ID card) and a statement that they have a disability and are unable to use fixed route service. Additional documentation may be required if the disability is not apparent.

Once registered with Pace, visitors will be able to use the service for any combination of 21 days during a 365-day period beginning with the visitor's first use of the service. Visitors wishing to use ADA Paratransit service more than 21 days during a 365-day period must apply and be found eligible for ADA Paratransit through the RTA's ADA Paratransit Certification Program. **For more information about ADA Paratransit visitor eligibility, please contact Pace at: 312-341-8000 or by email at ada.paratransit.visitor@pacebus.com.**

Using Fixed Route Bus and Rail Services

The RTA ADA Paratransit ID card enables an ADA-eligible customer and one PCA or companion traveling with them to ride on the CTA, Pace and Metra bus and rail systems at the reduced fare rate. Both riders are required to pay a fare. **For more information on using fixed route services, visit rtachicago.org/plan-your-trip or call the RTA Travel Information Center at 312-836-7000.**

RTA Travel Training Program

The RTA Travel Training Program teaches individuals with disabilities and older adults how to use CTA, Metra and Pace buses and trains. Travel Training is free except for the cost of transit fares during training sessions. RTA offers three types of training, depending on the individual's needs:

1. Trip Training
2. Individual Transit Orientation
3. Group Transit Orientation

To sign up for Travel Training or to request a Group Transit Orientation presentation, call the RTA at (312) 663-4357 or by email at: traveltraining@rtachicago.org.

Commendations, Complaints or Questions

Pace is committed to operating high quality service in compliance with ADA Paratransit service requirements. **Please contact Pace Customer Relations at 800-606-1282 / Option 2 if you have any commendations, complaints or questions regarding Pace ADA Paratransit Service.**

Thank you for riding with Pace!

Immediate Assistance

**If a passenger believes he/she has been stranded
Call: 800-606-1282 / Option 3**

**For life-threatening and medical emergencies
Call: 911**

Pace Paratransit Operations

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