

**Metro**

**St. Louis, MO**

**ADA Complementary Paratransit Service  
Compliance Review**

**April 11-14, 2005**

***Summary of Observations***

**Prepared for**

**Federal Transit Administration  
Office of Civil Rights  
Washington, DC**

**Prepared by**

**Planners Collaborative, Inc.**

**Final Report: February 5, 2007**

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## I. Purpose of the Review

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 ADA 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, and 38) include six service criteria, which must be met by ADA complementary paratransit service programs. Section 37.135(d) of the regulations requires that ADA complementary paratransit services meet these criteria by January 26, 1997.

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the ADA and the DOT regulations. As part of its compliance efforts, FTA, through its Office of Civil Rights, conducts periodic reviews of fixed route transit and ADA complementary paratransit services operated by grantees.

The purpose of these reviews is to assist the transit agency and the FTA in determining whether capacity constraints exist in ADA complementary paratransit services. The reviews examine policies and standards related to service capacity constraints such as those measured by on-time performance, on-board travel time, telephone hold times, trip denials, and any other trip-limiting factors. The reviews consider whether there are patterns or practices of a substantial number of trip limits, trip denials, early or late pickups or arrivals after desired arrival (or appointment) times, long trips, or long telephone hold times as defined by established standards (or typical practices if standards do not exist). The examination of patterns or practices includes looking not just at service statistics, but also at basic service records and operating documents, and observing service to determine whether records and documents appear to reflect true levels of service delivery. Input also is gathered from local disability organizations and customers. Guidance is provided to assist the transit operator in monitoring service for capacity constraints.

An on-site compliance review of ADA complementary paratransit service provided by Metro Transit of St. Louis was conducted April 11 to 14, 2005. Planners Collaborative, Inc., located in Boston, Massachusetts, conducted the review for the FTA Office of Civil Rights. The review addressed compliance of Metro's ADA complementary paratransit service with focus on one specific regulatory service criterion: the "capacity constraints" criterion. Section 37.131(f) of the regulations requires that ADA complementary paratransit services be operated without capacity constraints.

This report summarizes the observations and findings of the on-site review of Metro's ADA complementary paratransit service. First, a description of the approach and methodology used to conduct the review is provided. Then, a description of key features of transit services provided by Metro—light rail, fixed route, and ADA complementary paratransit service—is provided. All of the findings of the review are summarized in Section IV. Observations and findings related to each element of the capacity constraint criteria are then presented in Sections V through XI. Recommendations for addressing some of the findings are also provided.

Metro was provided with a draft copy of the report for review and response. A copy of the correspondence received from Metro on October 11, 2006 documenting their response to the draft report, is included as Attachment A.

## II. Overview

The review addressed service elements that affect an ADA complementary paratransit eligible person's ability to use the service as defined by the DOT ADA regulations. While addressing service area and eligibility, the review focused on compliance with the ADA complementary paratransit capacity constraints requirements of the DOT ADA regulations. Several possible types of capacity constraints are identified by the regulations. These include "wait listing" trips, having caps on the number of trips provided, or recurring patterns or practices that result in a substantial number of trip denials or missed trips, untimely pickups, or significantly long trips. Capacity constraints also include other operating policies or practices that significantly limit the amount of service to persons who are ADA complementary paratransit eligible.

To assess each of these potential types of capacity constraints, the review focused on observations and findings regarding:

- Trip denials and "wait listing" of trips
- Trip caps
- On-time performance
- Travel times

Observations and findings related to two other policies and practices that can affect ADA complementary paratransit use also are provided, including:

- Determinations of ADA complementary paratransit eligibility
- Telephone capacity

ADA complementary paratransit eligibility determinations were assessed to ensure that access to service was not adversely impacted by inappropriate denials of eligibility for the service or unreasonable delays in the eligibility process. Telephone capacity was assessed because access to reservations and customer service staff is critical to the effective use of any ADA complementary paratransit service.

The review also addressed scheduling, dispatch, and operation of service as potential causes of, or contributors to, capacity constraints. Similarly, adequacy of resources was reviewed as a potential contributor to capacity constraints.

### Pre-Review

The review first involved the collection and examination of key service information provided by Metro prior to the on-site visit. This information included:

- A description of how the ADA complementary paratransit service is structured.
- Public information describing the ADA complementary paratransit service
- A description of the St. Louis Metro's standards for on-time performance, trip denials, travel times, and telephone service

Metro was requested to make additional information available during the on-site visit. This information included:

- Copies of completed driver manifests for the most recent six month period (for each carrier)
- Six months of service data, including the number of trips requested, scheduled, denied, canceled, no-shows, missed trips, and trips provided by Metro
- A breakdown of trips requested, scheduled, and provided
- Detailed information about trips denied in the last six months including origin and destination information, day and time information, and customer information
- On-time performance information
- Detailed information about trips identified in the last six months with excessively long travel times
- Telephone call management records
- Records of recent customer comments and complaints related to capacity issues (trip denials, on-time performance, travel time, and telephone access)

## On-Site Review

An on-site review of the service was conducted from April 11 to 14, 2005. The on-site review began with an opening conference, held at 9 a.m. on Monday, April 11, 2005. In attendance were the following:

### *Metro representatives:*

Larry E. Salci	President & CEO
Thomas Sehr	Executive Vice President, Administration
Raymond A. Friem	Senior Vice President, Transit Operations
Patricia Hall	Director ADA Services
Janis Shetley	Chief of ADA Services
Todd Plesko	

### *FTA review team:*

David Knight	FTA Office of Civil Rights
Don Kidston	Planners Collaborative
David Chia	Planners Collaborative
Terry Regan	Planners Collaborative

### *FTA Region VII, participating in the opening conference via telephone:*

Mokhtee Ahmad	Administrator
Paula Schwach	Regional Counsel
Joan Roeseler	Team Leader - Office of Planning and Program Development

David Knight opened the meeting by thanking Metro for their cooperation in the review. He described the purpose of the review and emphasized that it was intended to assist Metro in

providing effective ADA complementary paratransit service. Mr. Knight outlined the steps in the review process:

- Preliminary findings and an opportunity to respond would be provided at a closing meeting on Thursday, April 14, 2005.
- A draft report would be provided to Metro for review and comment.
- Metro's comments would be incorporated into a final report, which would then become a public document.

Don Kidston described the objective of the review to identify significant impediments, if any, to people with disabilities receiving the service to which they are entitled under ADA, and to assist Metro in improving service if warranted. He described the scope of the review as including review of policies, procedures, practices, and performance that can affect availability of effective service. The areas to be addressed include service design criteria, eligibility, telephone access, reservations and scheduling, operating procedures, practices and performance, and adequacy of resources. Mr. Kidston went on to present the schedule for the on-site review, including the parts of the operation that would be observed by day. A copy of the review schedule is provided in Attachment B. The review team conducted the review generally in accordance with the review schedule.

An exit conference was then held on Thursday, April 14, 2005 at 1 p.m. Attending the exit conference were:

*Metro representatives:*

Thomas Sehr	Executive Vice President, Administration
Raymond A. Friem	Senior Vice President, Transit Operations
Patricia Hall	Director ADA Services
Paul Willett	

*FTA review team:*

David Knight	FTA Office of Civil Rights
Don Kidston	Planners Collaborative
David Chia	Planners Collaborative
Terry Regan	Planners Collaborative

*FTA Region VII:*

Cindy Terwilliger	Supervisory Senior Operations Manager
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Mr. Knight opened the exit conference by thanking the RTA staff for their cooperation in the review. The review team members, including Mr. Knight, then presented an overview of the review and initial findings in each of the following areas:

- Consumer input
- Service design parameters
- Eligibility determinations
- Telephone access

- Handling of trip requests and trip denials
- Trip scheduling
- On-time performance and service delivery
- Trip duration
- Operations
- Resources (vehicles, manpower, and financial resources)

The review team again thanked Metro for their cooperation during the field review.



### III. Background

St. Louis Metro was established in 1949 through a Compact as the Bi-State Development Agency. Establishment of Bi-State required passage of Federal and Missouri and Illinois state legislation. Metro, or the Bi-State Development Agency, is overseen by a Board of Commissioners consisting of representatives of: the Governor of Missouri; St. Louis, St. Charles and Jefferson Counties in Missouri; the City of St. Louis, MO; and St. Clair County in Illinois.

St. Louis Metro provides public transportation service in the St. Louis Metropolitan Region with Metro Bus, Metro Link, and Call-A-Ride. Through an agreement between Metro and St. Clair County in Illinois, Metro is responsible for operation of all Metro Link service including service in both Missouri and Illinois. Metro is also responsible for operation of Metro Bus routes, which are principally in Missouri. Madison County and St. Clair County Transit Districts are responsible for operation of most of the fixed route bus service in the Illinois portion of the Greater St. Louis transit service area.

Metro is a member of a Transit Management Agency (TMA), with Call-A-Ride providing both TMA and Metro services. Metro's principal Call-A-Ride service is "Call-A-Ride Plus," which is Metro's ADA complementary paratransit service. Metro also serves Medicare, Job Access Reverse Commute, and other trips as a member of the TMA, Metro staff operates Call-A-Ride directly without the assistance of contracted service providers.

Trip requests are received and scheduled seven days a week at a Central Call Center located at the Metro Main Repair Facility at 3300 Spruce Street in St. Louis. Customers may call up to seven days in advance to schedule trips. Trips are also dispatched at the Central Dispatch Center.

#### Metro ADA Complementary Paratransit Performance Standards

Metro has established the following service performance standards for ADA complementary paratransit service:

- **Telephone response time:** Metro's goal for hold times, or "wait times in queue" is an average of 4.18 minutes. Metro does not have a standard for number or percentage of calls by increments of time in queue.
- **Trip denials:** Metro's standard for trip denials is 0.
- **On-time performance:** Metro's goal for on-time performance is 94.6 percent, with an on-time trip defined as a trip that originates within 15 minutes before or after the scheduled pickup time (-15/+15). The computation of on-time performance includes counting trips picked up more than 15 minutes early as on time. Metro's policy is to pick up customers early only if the customers wish to board early. Additionally, Metro does not count a trip as late unless it is more than five minutes later than the on-time window, i.e., more than 20 minutes after the scheduled pickup time. Accordingly, for performance measurement, trips are considered on time if they are less than 20 minutes late (+20).

- **Travel time:** Metro's travel time standards are a maximum travel time of 45 minutes for intra-zonal trips and 90 minutes for inter-zonal trips, with a goal of completing inter-zonal trips in 60 minutes or less.

## Consumer Input

Prior to and during the on-site visit, the review team gathered input from the perspective of consumers to assist the reviewers in identifying regulatory issues of concern to consumers. Input was collected from review of complaints on-file with FTA, consumer interviews, and review of customer complaints on file with Metro.

### Formal ADA Complaints Received by FTA

There were two closed complaints relating to Metro's ADA complementary paratransit service on file with FTA. Both of the complaints addressed eligibility issues. They focused on the length of time before a determination of eligibility was received by the applicant.

### Consumer Interviews

During the two weeks before the on-site visit, a team member conducted telephone interviews of nine users of Metro's ADA complementary paratransit service. These consumer comments were used to gain a better insight into, and identification of, issues to be addressed during the site visit. Concerns raised during the interviews were as follows.

**Eligibility determinations:** Several interviewees said that their eligibility was not determined within 21 days of submitting a completed application and they were not apprised of their rights to use the service after 21 days until a determination of eligibility was made. One said that because she was not assigned a Dial-a-Ride number, Call-A-Ride reservationists were not able to schedule a ride for her.

**Half-hour window:** Several interviewees were unclear as to the application of the 30 minute pickup window used for scheduling vehicle arrivals. Metro advises customers to be ready to board the vehicle 15 minutes before or after the scheduled time (-15/+15). Interviewees believed that they were expected to be ready to board vehicles 30 minutes before the schedule time they were given.

**Telephone Access:** Most interviewees complained that the amount of time required to make a reservation was too long. This included both a long wait time when the caller was on hold and a long time involved in making a reservation after the call was answered.

**Time vehicle would wait before leaving:** Several interviewees complained that the van driver did not wait a full three minutes for the person to get to the van, as described in Metro procedures. Several commented that they wanted Metro's dispatcher to give them a call if they were not at the stop, or if they were at the location but the driver did not see them, in order to avoid missed connections. When the driver leaves without waiting, the rider is assessed a penalty as a no-show for the scheduled trip.

**Inappropriate transfer station locations:** Several interviewees complained that the locations being used as transfer points between vehicles were not appropriate places for ADA complementary paratransit customers. They felt that locating the transfer stations at busy, noisy locations was uncomfortable and disorienting for customers who have certain disabilities, such as blindness.

**Removal of the voucher program:** Several interviewees complained about the discontinuation of the voucher program that let passengers pay with a voucher rather than cash. Several of the interviewees have trouble handling cash, a problem that vouchers addressed.

**Rudeness of administrators:** Several interviewees complained that the senior program administrators “had an attitude” and would not listen to suggestions from the community.

### Rider Comments on File at Metro

Metro receives consumer comments for all of its services through three media: telephone, e-mail, and written letters. The majority of comments are made by telephone to the Metro Customer Service Center.

If a complaint is received by Metro through its central call center, the complaint is forwarded to Call-A-Ride for investigation and resolution. When a complaint is received at Call-A-Ride headquarters, the complaint is entered into its database and the complaint is given to the Operations Manager to investigate. There is no standard procedure for following up with the customer on the resolution of the complaint. If there is further customer communication, most times it is by way of a phone call.

During the site visit, the team reviewed complaints for the period from July 1, 2004, through March 31, 2005. During this nine-month period there were a total of 69 complaints received concerning Call-A-Ride service. Table III.1 lists categories of complaints by month for the nine-month period. The most frequent complaint categories were service contact, operator behavior, equipment, and administration.

**Table III.1 – Call-A-Ride Complaints Reported to Metro: July, 2004 – March 2005**

COMPLAINT CATEGORY	2004						2005			TOTAL	
	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	No.	% by cat.
Service Contact	4	4	2	3	6	9	1	2	1	32	46
Operator Behavior	0	2	4	0	2	2	7	4	4	25	36
Equipment: Van	0	1	0	0	2	0	2	1	0	6	9
Administration	2	0	0	1	3	0	0	0	0	6	9
Totals	6	7	6	4	13	11	10	7	5	69	100%

The two categories that comprise the vast majority of complaints are service contact and operator behavior.

1. Complaints within **service contact** include:

- Late vehicles
- Vehicles not arriving
- Proposed schedule changes
- Customer appealing of a penalty
- Miscellaneous service issues

2. Subcategories under **operator behavior** include:

- Driver being rude to the customer
- Speeding or reckless driving (predominantly from non-passengers)
- Leaving the van unattended
- Detouring from the route
- Miscellaneous operations conduct

## Observations

The Metro complaint procedure does not include provision for communicating the disposition of complaints to customers. When there is follow-up communication with customers it is usually through a phone call. The absence of a feedback loop can be construed by the complainant that they are not being heard or that there is no interest in their complaint, thereby discouraging customers from raising service or other issues with Metro.

Metro maintains two separate comment tracking systems for comments about Call-A-Ride: one at Metro headquarters; and one at Call-A-Ride offices. Metro and Call-A-Ride maintain separate databases to track the comments and complaints. The two databases are not integrated, but are separate, stand-alone systems. Duplicate systems can result in redundancy of effort and can impede understanding system-wide customer concerns.

Although not a regulatory issue, Metro may wish to consider modifying its complaint tracking procedures to include a timely response to customers as a means of improving customer relations and communications and encouraging customer feedback. A central complaint system can eliminate redundant tracking of complaints and facilitate a company-wide approach to customer service.

## IV. Summary of Findings

The following summarizes the findings made as a result of the review. The findings are observations of policies, procedures, practices and performance related to delivery of service as required by DOT ADA regulations at the time of the review. Findings may be positive, neutral, or identify opportunities to improve service. The bases for these findings are presented in other sections of this report. Findings of opportunities to improve service should be used to identify corrective actions proposed by Metro. Recommendations are also included in the body of the report for Metro's consideration in developing corrective actions.

### A. ADA Complementary Service Criteria

1. The Metro ADA complementary paratransit service area includes all locations in St. Louis City and St. Louis County, within 3/4-miles of all Metro fixed route services.
2. Metro does not provide Call-A-Ride Plus service to service areas within 3/4-miles of Metro Link Stations that it serves in Illinois.
3. Metro and ATS effectively coordinate interregional service for ADA complementary paratransit eligible customers. It is a seamless process for riders, including reservation and fare payment.
4. Metro Call-A-Ride Plus service schedule does not include service for all days and hours of scheduled service for several Metro Bus routes.
5. For trips of two or three zones, it appears that the Call-A-Ride Plus fare of \$3.50 can be more than two times the fare of a comparable fixed route trip on Metro by a typical user, if that user is traveling without a transfer on Metro Link one of the many Metro Bus routes that serve multiple Call-A-Ride zones.
6. The transfer charge for Call-A-Ride Plus trips that include transfers to fixed route service can further increase the difference between Call-A-Ride Plus fares and fixed route fares for trips with the same trip origin and destination.

### B. ADA Complementary Paratransit Eligibility

1. Metro's policy is to make determinations of ADA complementary paratransit eligibility based on whether the applicant's mobility aid meets the definition of a "common wheelchair." This determination fails to make the distinction between the eligibility of the applicant and the applicant's mobility aid. The determination of eligibility should be made solely based on the applicant's ability to use fixed route service as addressed in 49 CFR §37.123, and not on the mobility aid that the applicant uses. The decision to limit service to mobility aids that meet the definition of a common wheelchair should be addressed by Metro as a separate issue from eligibility.
2. Based on review of a sample of 34 applications for Metro's Call-A-Ride service submitted during 2004 and 2005, the determinations made by Metro seem reasonable. Other than the policy regarding common wheelchairs, Metro's eligibility determination process does not appear to deny or restrict ADA complementary paratransit service to eligible individuals.

3. Approximately 25 percent of applicants receive conditional eligibility. At the time of the on-site review Metro provided service to individuals who have conditional eligibility as if they had unconditional eligibility. As a result, any rider with conditional eligibility could be scheduled for any trip requested.
4. Metro has defined its eligibility process such that the application is complete after the in-person assessment. Based on this standard, Metro made determinations within 21 days for only 4 of the 12 applications in the review team's sample of applications filed between March and December of 2004. Four applications took at least 90 days and two applications took up to 170 days. In a February 2005 sample, Metro greatly improved the timeliness of its application processing, making determinations for 20 of 22 completed applications within 21 days.
5. The time from submittal of a written application and an in-person interview is significant and could be an impediment to ADA complementary paratransit eligible individuals obtaining access to service. The average number of days in the 2004 sample was 63 days between receipt of written application and the in-person assessment. This decreased to 33 days in the 2005 sample. Metro did not have any documentation to identify the reason for the extended period between application submission and in-person assessment.
6. The DOT ADA regulations (49 CFR §37.125 (c)) requires that applicants be treated as eligible for service if a determination of eligibility has not been made within 21 days following the submission of a complete application. The application and other public information provided by Metro do not inform applicants of their right to service if they have not received a determination on their completed application within 21 days.
7. Metro has a process in place for appealing eligibility determinations. However, as of the time of the review team's site visit, there had not been a formal appeal for more than three years. As a result it was not possible to review determinations made on requests for appeal.
8. In its letter to applicants who are determined ineligible for ADA complementary paratransit service, Metro does not provide specific reasons for why the applicant is determined ineligible for service. Absence of such information could impede applicant's decision on whether or not to appeal the determination.
9. In its letter to applicants who receive temporary eligibility for ADA complementary paratransit service and in its letter to applicants who are denied eligibility for ADA complementary paratransit service because the mobility aid that they use, Metro does not refer to or include information on its appeals process. As a result, applicants who are determined ineligible may not be aware of their right to appeal the decision.
10. Metro's appeals process description states, "Appeals must be made in writing" and "The written appeal should state the reason or reasons you believe the determination to be incorrect." To require the appeal be made in writing and state the reason for the appeal could deprive the appellant of an opportunity to be heard and present information and arguments that the appellant would otherwise have if the appeal were made orally and without advance written reasons.
11. Metro's Director of ADA services handles request for appeals on an informal basis. The Director of ADA services has the formal responsibility for approving all initial eligibility determinations. This practice is at variance with the requirements of the DOT ADA

regulations that decisions on appeals be made by a person not involved in the initial decision to deny eligibility, or “separation of functions.”

12. Finding withdrawn (see Reporting Chart accompanying the Final Report).
13. Metro considers same day cancellations in its procedure for service suspensions. The DOT ADA regulations allow transit systems to suspend service for a reasonable period for riders who abuse the system by regularly “no-showing” for scheduled trips. While transit agencies have in recent years also considered “late cancellations” to be an abuse of the system and have considered this in their suspension policies, the effects of a late cancellation should be operationally equivalent to a no-show in terms of the negative impact on the service. Cancellations made several hours in advance of the scheduled pick-up time would still seem to allow the system’s dispatchers to use the open vehicle time to respond to same-day operating issues. Accordingly, same day customer cancellations made several hours before the scheduled time should not be considered as a basis for suspending customer service.
14. Metro’s ID card for ADA complementary paratransit service includes condition codes for individuals who are conditionally eligible. However, the card does not provide an explanation for these codes.

### C. Telephone Access

1. Metro’s policy goal of average times in queue of 4.18 minutes likely results in many calls in queue for periods of time well in excess of 4.18 minutes and would appear to significantly limit ADA complementary paratransit customers’ ability to use Call-A-Ride service.
2. During the week of February 7 to 11, 2005, Metro received a total of 4,053 calls to the reservation center. Daily average hold times for the four phone lines ranged from 0.65 minutes to 2.45 minutes. Of the 4,053 calls, 737 were abandoned by the caller for an abandonment rate of 18 percent. This high abandonment rate is an indicator of difficulty in getting through on the phone lines to make reservations. Call Center staffing and equipment limits may be contributing to long hold times and high abandonment rates.
3. The review team observed 76 calls during the two-day period of April 12 and 13, 2005. These calls averaged over seven minutes to complete. The reservations system being used at the time of the review appeared to be antiquated and slow, contributing to the long call times. Metro was in the process of upgrading its computer reservations system with a scheduled implementation during the summer of 2005.
4. Metro’s advertised Call-A-Ride reservations hours are 7:30 a.m. to 4:30 p.m. During the review, the Reservations Center closed at 4:21 p.m., based on a wall clock that was nine minutes fast.
5. Any calls left in the queue at the end of the day were abandoned. As a result, some customers calling before 4:30 p.m. are not being served.
6. Metro accepts only four one-way trip requests per call during peak call times. This policy can increase the length of telephone queues by requiring reservationists to handle multiple calls rather than one to serve one customer and placing multiple calls rather than one in the phone queue.

7. Metro tracks performance by measuring the callers' average time in the telephone queue. This performance measure does not capture the number of callers that have significantly long hold times, which provides a better index of customer service and telephone access.
8. It is Metro's practice for reservation clerks to rotate into the dispatch center and handle customer assistance calls. This appears to be very beneficial because it allows the reservation clerk to understand additional aspects of the reservation process and gives the clerk a greater sensitivity to the customer's needs.

## **D. Trip Reservations and Scheduling**

1. Metro's web site and the Metro Call-A-Ride brochure dated June 28, 2004, advise Call-A-Ride customers to "phone at least 24 hours in advance to schedule your trips." The DOT ADA regulations (49 CFR §37.131(b)) requires the transit entity (Metro) to schedule and provide trips in response to a request for service made the previous day.
2. At the time of the review team's on-site visit, Metro regularly denied trip requests for ADA complementary paratransit service due to capacity constraints. The proportion of denials was generally two percent of total demand on weekdays. Of these denials approximately 20 percent were for next day service requests and 80 percent were for service requests two or more days in advance of the service day. Metro managers said that many of the riders who have their trip requests denied call back on a subsequent day and get a trip. However, Metro has not tried to document this number, and it is not without significant effort on the part of the rider.
3. Many trips denied early in the scheduling period can be scheduled later in the scheduling period as a result of trip cancellations and/or route modifications made by proofers. Denial of such trip requests precludes them being served unless the customer calls again at a later time to request the trip.
4. The Metro scheduling software does not include a function to schedule trips to meet appointment times. Reservationists record appointment times requested by callers in the software system and can attempt to place the trip on the run they feel is most appropriate. However, Metro has not set up PASS to schedule by appointment time.

## **E.1 Service Performance**

1. Metro's policy standard for service denials does not appear to consider all denials. Metro's policy standard is zero denials for requests made the previous day. Metro accepts service requests seven days in advance of the service day, and "Metro Call-A-Ride Easy Trips" brochure encourages customers to call early to make trip reservations. Denying a trip more than one day in advance of the service day, thereby requiring multiple calls to schedule a trip, appears to limit access to the service and constitute a capacity constraint.
2. The review team's analysis of a one-day sample indicates that 42 (2 percent) of trip requests for service on February 9, 2005 were denied. During the period June through December 2004 Metro reported next day denials of 0.6 percent. Metro indicated that some customers



who are denied service more than one day in advance of the service day call back and eventually reserve their requested trip.

3. Metro appears to have no policy for missed trips.
4. Based upon a review of Call-A-Ride data reports for February 9, 2005, it appears that Metro does not record missed trips as a category for performance monitoring purposes. Missed trips appear to be grouped with customer no-shows and late cancellations.
5. Analysis of data for the sample day indicated that for 10 trips (0.6 percent of the 1,752 ADA trips dispatched on the service day) that were not completed, the vehicle arrived at the pickup address more than 15 minutes after the scheduled time. For 47 trips (2.7 percent) that were not completed, there was no vehicle arrival time. All of these trips could be missed trips—resulting in as many as 57 (3.3 percent) missed trips. Some of these trips could also be late cancellations.
6. Metro has two standards for on-time performance. For the customer, the standard for on-time is a vehicle arrival between 15 minutes before and 15 minutes after (-15/+15) the scheduled time. For performance measurement and reporting the standard is 15 minutes before and 20 minutes after (-15/+20) the scheduled time. Use of one standard for the customer and a more generous standard for performance measurement overstates the level of service being provided to the customer.
7. Based on an on-time window of 15 minutes before to 15 minutes after (-15/+15), 93.7 percent of customers were picked up either early or on-time, and 6.3 percent of customers were picked up late on the sample day. Of the late trips, 19 (1.2 percent of completed trips) were more than 15 minutes late and, of those, 3 (0.2 percent) were more than 30 minutes late. Based on this sample there do not appear to be a significant number of substantially late pickups.
8. On the sample day, there were 260 passengers (15.9 percent of completed trips) picked up early. Of that number, 28 (1.7 percent of completed trips) were picked up more than 16 minutes early; of those trips, 10 (0.6 percent of completed trips) were picked up more than 30 minutes early. Very early pickups could indicate that customers are being pressured to accept early departures.
9. Of 739 trips with scheduled drop-off or appointment times, 617 (83.5 percent) were early or on-time and 122 (16.5 percent) were late. Of these late drop-offs, 34 (4.6 percent) were more than 15 minutes late; of this number, 18 (2.4 percent) were more than 30 minutes late. These late drop-offs, potentially resulting in late arrivals for work, school, or medical appointments, could be considered a constraint to use of the service by paratransit eligible individuals.
10. From a sample of 26 long trips on February 9, 2005, 14 (0.9 percent of the completed trips) exceeded Metro's standard of 90 minutes for intra-zonal trips. 15 (0.9 percent) of the 29 long trips sampled were more than 30 minutes longer than a comparable fixed route trip and 7 (0.4 percent) were more than 46 minutes longer. Five of the trips that were more than 30 minutes longer than a comparable fixed route trip were to or from the same location. This appears to be a pattern of significantly long trips.

## **E.2 Transportation Operations**

1. Dispatchers appear to monitor and control service so as to avoid missed trips and maintain a high level of on-time performance.
2. Dispatchers appear to have effective procedures in place to minimize customer no-shows. Dispatchers attempt to contact passengers if drivers are unable to find them at the pickup location.
3. Metro has a “no strand” policy for riders with return trips. If a rider calls after the vehicle has left, Metro will not record this as a passenger no-show, but will re-classify the trip as a will-call for later pickup.
4. Metro appears to have the capacity to accommodate some trips that could not be scheduled before the service day by assigning those trips to “Route 0,” as well as using capacity made available from cancellations and available on the “clean up” runs. This capacity could be used to reduce or eliminate trip denials.
5. Call-A-Ride appears to have sufficient dispatch coverage to effectively monitor and control service.
6. Drivers appear to be well trained and have the resources including vehicles and dispatch support to perform their job.
7. Drivers cited illogical routing and tight schedules as a concern.

## **F. Resources**

1. Staffing of the Call-A-Ride call center appears to limit access by customers to reserve trips. New reservations software and procedural changes to reduce call volume should increase efficiency of the reservations process, but additional staffing will likely be required to reduce hold times to a level that does not significantly impeded access to service.
2. Equipment and staffing of scheduling, dispatch, and transportation service appear to be adequate to provide effective service at current levels of demand.
3. Increased demand for service may require an increase in the number of runs and associated increases in the number of drivers and vehicles.
4. Budget increases in recent years appear to be responsive to the need to meet unserved demand for service (trip denials).

## V. ADA Complementary Paratransit Service Criteria

The review team compared Metro's ADA complementary paratransit service with its fixed route service to determine whether it is comparable, with respect to the DOT ADA regulations as cited, in the following areas:

- Service area (49 CFR 37.131(a))
- Days and hours of service (49 CFR 37.131(e))
- Fares (49 CFR 37.131(c))

The review team analyzed consumer complaints; assessed information distributed to riders; reviewed Metro policies regarding service area, days and hours, and fares; and interviewed Metro staff.

The two complaints filed with FTA did not mention service criteria as an issue.

Several consumers contacted during the pre-assessment expressed concerns with transfer locations and the voucher fare program. Several interviewees complained that the locations being used as transfer points between vehicles were not appropriate places for ADA complementary paratransit customers. They felt that locating the transfer stations at busy, noisy locations was uncomfortable and disorienting for customers who have certain disabilities, such as blindness. In addition, several interviewees complained about the discontinuation of the voucher program that let passengers pay with a voucher rather than cash. Several of the interviewees have trouble handling cash, a problem that vouchers addressed. However, neither of these complaints addressed the service area or the fare rates, only the methods used to provide service throughout the area and collect fares.

In addition, of 69 complaints on file with Metro during the nine month period from July 1, 2004, through March 31, 2005, none specifically addressed service area, hours, or fares.

### Description of Fixed Route Service

MetroLink is a 28-station light rail system that operates between Lambert Airport Main Station, northwest of the city center, and Shiloh-Scott Station, east of St. Louis in Shiloh, Illinois, by way of downtown St. Louis and East St. Louis. Service frequency ranges from six minutes during peak weekday time periods up to 30 minutes during off-peak weekday and early and late weekend time periods. Some trains in Illinois do not continue to the eastern terminus station (Shiloh-Scott) at Southwestern Illinois College. Service on holidays is operated on a modified schedule. Weekday service begins with an eastbound train departing Metro Park Station at 3:24 a.m., and ends with an eastbound train terminating at Shiloh Clark Station at 1:02 a.m.

MetroBus operates on 68 routes. Thirteen of these 68 routes provide express service and all 68 routes operate in Missouri. Each route begins and ends service at different times of the day with service beginning as early as 4:10 a.m. and ending after 1:30 a.m.

Metro’s fare schedule displayed on its web site at the time of the review was as follows:

	Full Fare	Reduced Fare
<b>Local and Express MetroBuses or MetroLink</b>	<b>\$1.50</b>	<b>\$0.75</b>
<b>Single-Use Transfers</b>	<b>\$0.25</b>	<b>\$0.10</b>
<b>Passes/Multiple Tickets</b>	Full Fare	Reduced Fare
<b>Lambert Airport Ticket Vending Machines [TVMs] (includes single-user transfers)</b>	<b>\$3.00</b>	<b>\$1.50</b>
<b>10-Ride Ticket Books or 10 TVM Tickets (includes one single-use transfer per ticket)</b>	<b>\$15.00</b>	<b>\$7.50</b>
<b>One-Day Pass</b>	<b>\$4.00</b>	<b>\$4.00</b>
<b>Weekly Pass</b>	<b>\$15.50</b>	<b>n/a</b>
<b>Monthly Pass</b>	<b>\$50.00</b>	<b>\$25.00</b>
<b>10-Ride Student Tickets (includes one single-use transfer per ticket)</b>	<b>\$10.00</b>	<b>n/a</b>
<b>Student Semester Pass</b>	<b>\$110.00</b>	<b>n/a</b>
<b>College Universal Pass</b>	<b>Free from <a href="#">SWIC</a>, <a href="#">UM-St. Louis</a></b>	

Full fares apply to customers over the age of 13.
Reduced fares apply to children between the ages of 5 and 12. Customers over the age of 65 (Seniors) and customers with disabilities must also present their Metro Reduced Fare ID Card, Medicare Card, or Metro ADA Paratransit card.
Children under the age of 5 ride free.
<b>The single-use transfer</b> is valid for two hours and only one transfer between MetroBuses, or to transfer from a MetroBus to MetroLink to a second MetroBus. (Examples of the transfer use would be to travel on a Grand bus to MetroLink to a Dorsett-Lackland bus or to use the Grand bus and transfer to a Martin Luther King bus.) The transfer should be retained for the entire trip as proof of payment.
<b>A One-Day Pass</b> is good from midnight to midnight on the date of issuance
<b>Weekly Passes</b> are good for a fixed period beginning on Monday and ending on Sunday.
<b>Student 10-ride ticket</b> books are sold at elementary, junior and high schools. Students up to age 19 can use them on MetroTransit until 10 p.m. Monday through Friday.
<b>Student Semester Passes</b> are available at participating colleges and universities

The adult full fare for Metro service is \$1.50 with a transfer charge of \$0.25. The full adult fare from the two Lambert Airport Stations is \$3.00 including transfers.

Metro offers pass and ticket sales through its web site as follows:

- Monthly Pass: \$50
- Monthly Reduced Pass Reduced fares (apply to seniors age 65 and over) and disabled persons with proper identification, including Medicare or Bi-State identification cards: \$25
- One Day Pass: Valid for unlimited riding for date revealed on regular MetroBus and MetroLink service. Not valid on seasonal services, Call-A-Ride or Call-A-Ride Plus: \$4
- Ten-Ride Ticket Booklet: Valid for 10 rides before expiration date on all regular MetroBus, MetroLink and Illinois service: \$15

MetroLink is a proof of payment system. Tickets can be purchased at vending machines on MetroLink station platforms. Pre-purchased tickets must be time and date stamped using validation machines located at the station platforms. Metro security personnel randomly check passenger tickets at station platforms and on trains. Anyone riding without such a proof is subject to a citation and fine.

## Description of the ADA Complementary Paratransit Service

Metro provides Call-A-Ride Paratransit Services. Call-A-Ride operates as a division of a regional Transportation Management Association (TMA). Call-A-Ride serves a number of different clients, including: ADA complementary paratransit eligible customers, the general public, and Medicaid eligible customers. Service for ADA eligible customers is referred to as Call-A-Ride Plus. Metro estimates that approximately 90 percent of Call-A-Ride customers are ADA eligible. Among the TMA clients are the Department of Mental Health and other social service agencies. Call-A-Ride also operates Job Access Reverse Commute service.

The Metro Call-A-Ride Brochure dated June 28, 2004, (Attachment C) includes a map of the service area for both Call-A-Ride and Call-A-Ride Plus service. Together, the two services cover all of St. Louis City and St. Louis County. The six zones are broken out as follows:

- Zones 4 and 5 are comprised of all of St. Louis City and the close in portions of St. Louis County. Service in St. Louis City is always limited to Call-A-Ride Plus service. Service in the St. Louis County portions of zones 4 and 5 is limited to Call-A-Ride Plus service weekdays, but is open to the general public on weekends.
- Zone 1 (North County), Zone 2 (West County), and Zone 3 (South County), make up the outlying areas where there is both Call-A-Ride Plus service as well as dial-a-ride service available to the general public.
- Zone 6, Far West County, offers additional limited service, available weekends only, and open to the general public.

Service hours are from 4:00 a.m. to 1:30 a.m. on Monday through Friday and from 5:00 a.m. to 1:30 a.m. on Saturday and Sunday in Zones 4 and 5. In Zones 1, 2, and 3 service hours are 6:00 a.m. to 12:00 Midnight on Monday through Friday. On Saturday and Sunday service in Zones 1, 2, 3, and 6 operates from 6:00 a.m. to 10:00 p.m.

ADA complementary paratransit fares are \$3.00 within one zone and \$3.50 between zones.

Metro staff provides all Metro Call-A-Ride services, including reservations, scheduling, dispatching, and operation of services. Reservations, customer information, scheduling, and dispatching are provided by Metro staff at a centralized call center located at the Metro Main Repair Facility at 3300 Spruce Street in St. Louis.

Call center hours are 7:30 a.m. to 4:30 p.m. seven days a week. Calls are received through a central ACD phone system. Paratransit Reservation Clerks and Dispatchers take customer calls to reserve trips and answer service questions. Trips are scheduled using the Trapeze Paratransit Automated Scheduling System (PASS).

Call-A-Ride vehicle dispatching is performed from a dispatch center also located at the Metro Main Repair Facility. Each Call-A-Ride vehicle is equipped with a two-way radio and a mobile data terminal (MDT). Metro has a dedicated channel for voice communication and two channels for the MDTs.

## **Service Criteria Observations**

### **Service Area**

The DOT ADA regulations require that ADA complementary paratransit service be available within 3/4-mile of all bus routes, and within 3/4-mile of all rail stations (49 CFR §37.131(a)).

The review team compared the map of the Call-A-Ride Plus service area contained in the Metro Call-A-Ride brochure (Attachment C) to a map of St. Louis Metro's fixed route service, with an overlay of a 3/4-mile corridor on either side of all routes. This map was provided by the Metro Planning Department. The six Call-A-Ride Plus zones cover all bus routes and surrounding 3/4-mile area. However, Metro provides fixed route service in Illinois, via MetroLink. This service is operated by Metro but is outside the Call-A-Ride Plus service area. As the MetroLink operator, Metro has the responsibility of providing ADA complementary paratransit service within 3/4-miles of MetroLink stations in Illinois during the same days and hours that MetroLink service operates to those stations. Illinois MetroLink ADA complementary paratransit service can be provided by Metro Call-A-Ride or by St. Clair County and/or Madison County Transit Districts on behalf of Metro.

Regarding interregional trip requests between St. Louis and East St. Louis, served by ATS of St. Clair County, Illinois, the review team noted that Metro and ATS coordinate service between the service areas. It is a seamless process for riders, including reservation and fare payment.

### **Days and Hours of Service**

The DOT ADA regulations require that ADA complementary paratransit service be available during the same hours and days as fixed route service (49 CFR §37.131(e)).

Table V.1 shows the hours of operation of Call-A-Ride Plus, as communicated to the public in the Metro Call-A-Ride brochure.

A reviewer examined the time of the first and last bus pull-in and pull-out for fixed route passenger service for Brentwood and DeBaliviere Garages. The data, which was provided by Metro’s Planning Department, was reviewed to determine whether Call-A-Ride service hours are cover those of fixed route service.

**Table V.1 – Call-A-Ride Plus Hours of Operation**

Zone 4 & 5	Mon – Fri: 4 a.m. – 1:30 a.m. Sat – Sun: 5 a.m. – 1:30 a.m.
Zone 1, 2, & 3	Mon – Fri: 4 a.m. – 12 Midnight Sat – Sun: 6 a.m. – 10 p.m.
Zone 6	Sat – Sun (only): 6 a.m. – 10 p.m.

Several Metro bus routes are in operation before or after Call-A-Ride Plus service is available, as defined in Table V.1 above. In the central Zones 4 and 5, this includes, but is not necessarily limited to:

- The weekday service of the 4, 70, 93, and 97 routes all have scheduled stops listed as later than 1:30 a.m., while Call-A-Ride Plus service hours end at 1:30 AM.
- On Saturday mornings, 13 routes begin revenue service (4, 10, 11, 30, 32, 52, 70, 74, 80, 93, 94, 95 and 97) before 5 a.m. The Route 40 Broadway, for example, makes its first pickup at the Riverview Shopping Center at 4:10 a.m. Call-A-Ride Plus weekend service begins at 5 a.m.
- On Saturday evenings, service on both the 93 and 97 routes is provided later than 1:30 a.m., when Call-A-Ride Plus service ends

Next the review team checked the schedules of sample bus routes that run through the outer Zones 1, 2, 3, and 6, where Call-A-Ride, and thus Call-A-Ride Plus, service hours are more restricted. Again, the team found additional instances of fixed route bus service scheduled outside Call-A-Ride service hours, including, but not necessarily limited to:

- The 32 Wellston-M.L. King Route has scheduled stops in Zone 1 earlier than 5 a.m., and later than 12 Midnight on weekends. Call-A-Ride Zone 1 service hours are 6 a.m. to 10 p.m.
- Similarly, route 52 Clayton South County has nine runs on Saturday and Sunday through Zone 3 outside the hours that Call-A-Ride is offered.

In addition, in Zone 6, where Metro has only weekend Call-A-Ride service, the Chesterfield Connector II operates during weekdays to the Spirit of St. Louis airport, while Call-A-Ride, according to the brochure, does not.

**Fares**

DOT ADA regulations allow operators to charge a fare for ADA complementary paratransit service that is up to twice that charged on fixed route service for the same origin and destination at the same day and time (49 CFR §37.131(c)). According the brochure, Call-A-Ride Plus has a

zone-based fare structure, as outlined in Table V.2. Attendants ride for free. Companions pay under the same fee structure as ADA-eligible riders.

**Table V.2 – Call-A-Ride Plus Fares**

<b>Trip Distance</b>	<b>One-way Fare</b>
1 Zone	\$3.00
2 Zones	\$3.50
3 Zones	\$3.50

The base fare for Metro Bus or Metro Link is \$1.50, with an additional 25 cents for a transfer within two hours. A transfer to Metro Bus or Metro Link from Call-A-Ride Plus is a 10-cent transfer fee. A transfer from a Metro Bus or Metro Link to Call-A-Ride Plus is 10 cents, plus an additional \$4.25 or \$2.25 “depending on paratransit trip eligibility.”

For trips of two or three zones, it appears that the Call-A-Ride Plus fare of \$3.50 can be more than two times the fare of a comparable fixed route trip on Metro by a typical user, if the fixed route user is traveling without a transfer on Metro Link or one of the many buses that cross between zones. The fixed route fare for such trips would be \$1.50.

For trips involving a transfer between the fixed route and Call-A-Ride Plus, it appears that in some circumstances the fare paid by an ADA customer for the entire trip can be more than two times the fare of a comparable fixed route trip on MetroBus or MetroLink. This would be the case when Call-A-Ride Plus van serves as a feeder service to a rider who has an origin or destination on a multi-zone MetroBus route or on MetroLink. The Call-A-Ride Plus fare would be \$3.60, while the multi-zone MetroBus or MetroLink fare for the comparable trip could be \$1.50.

## Findings

1. The Metro ADA complementary paratransit service area includes all locations in St. Louis City and St. Louis County, within 3/4-miles of all Metro fixed route services.
2. Metro does not provide Call-A-Ride Plus service to service areas within 3/4-miles of Metro Link Stations that it serves in Illinois.
3. Metro and ATS effectively coordinate interregional service for ADA complementary paratransit eligible customers. It is a seamless process for riders, including reservation and fare payment.
4. Metro Call-A-Ride Plus service schedule does not include service for all days and hours of scheduled service for several Metro Bus routes.
5. For trips of two or three zones, it appears that the Call-A-Ride Plus fare of \$3.50 can be more than two times the fare of a comparable fixed route trip on Metro by a typical user, if that user is traveling without a transfer on Metro Link one of the many Metro Bus routes that serve multiple Call-A-Ride zones.



6. The transfer charge for Call-A-Ride Plus trips that include transfers to fixed route service can further increase the difference between Call-A-Ride Plus fares and fixed route fares for trips with the same trip origin and destination.

## Recommendations

1. Metro should provide ADA complementary paratransit service to areas within 3/4-miles of the Metro Link stations that it serves in Illinois. This might be done by St. Clair County Transit District on behalf of Metro, by extending Call-A-Ride Plus service, or by other means.
2. Metro should revise its service hours to provide Call-A-Ride Plus service during the same days and hours that Metro Bus service is scheduled. Call-A-Ride Plus information materials should be revised to communicate the revised Call-A-Ride Plus service periods.
3. Metro should revise its fare structure such that Call-A-Ride Plus fares are no more than double the regular fare for fixed route service for a comparable linked trip from trip origin to destination. This could be accomplished by reducing the Call-A-Ride Plus fare to \$3.00 per trip, which equals twice the regular fixed route fare. This could also be accomplished by limiting the \$3.50 Call-A-Ride fares to only zones that coincide with fixed route service areas that require a transfer and a 25-cent transfer charge.
4. Similarly the transfer charge for Call-A-Ride Plus trips that include transfers to fixed route service should be reviewed and revised as necessary in order to insure that Call-A-Ride Plus fares do not exceed twice the regular fare for fixed route service.

## VI. ADA Complementary Paratransit Eligibility

The purpose of the review of the eligibility process was to identify any policies, procedures, or practices that prevent individuals with disabilities from gaining timely access to ADA complementary paratransit service. Review team members:

- Interviewed consumers regarding issues about the eligibility process
- Interviewed Metro's director of ADA services
- Visited the Transit Assessment Center, where Metro conducts in-person assessments;
- Collected and reviewed materials used in the certification process
- Reviewed a sample of 34 completed applications and their respective eligibility determinations
- Reviewed recent statistics related to eligibility processing time and determinations

### Consumer Comments

The review team gathered information about the concerns of riders who use Metro's Call-A-Ride service through telephone interviews with riders or professionals who work with riders and through review of written and telephone complaints to Metro and FTA.

In telephone interviews, review team members asked the riders if they had any problems in obtaining eligibility for ADA complementary paratransit service, or if the determination took more than 21 days. Several interviewees said that their eligibility was not determined within 21 days of submitting a completed application, and that they were not apprised of their rights to use the service after 21 days until a determination of eligibility is made. One rider said that because she was not assigned an ID number, reservationists were not able to schedule a ride for her.

In early 2005, participants at a meeting sponsored by the Starkloff Disability Institute provided comments on Call-A-Ride. The Starkloff Disability Institute is an organization based in St. Louis that conducts research and advocacy related to disability issues. The concerns about the Call-A-Ride eligibility cited by participants at the meeting included the following:

- Eligibility determinations do not properly account for weather and environmental factors
- Eligibility determinations often take longer than 21 days, especially for recertifications
- Applicants who request information in alternative formats do not always receive it
- The appeals process is "intimidating and biased"
- Metro should consider "grandfathering" eligibility of Call-A-Ride users

There were two formal complaints on file with FTA relating to Metro's ADA complementary paratransit service. Both of the complaints addressing eligibility issues focused on the length of time before a determination of eligibility was received by the applicant. FTA had closed both of these formal complaints.

## Eligibility Determination Procedures and Practices

The director of ADA services oversees Metro's eligibility determination process for ADA complementary paratransit service. She has a staff of five, each of whom spends part or all of their time on Call-A-Ride eligibility. In addition, since January 2004, Metro has contracted with Washington University to conduct in-person assessments of Call-A-Ride applicants.

As of April 2005, the director of ADA services estimated that 10,000 individuals had some level of Call-A-Ride eligibility. For the 15-month period of January 2004 to March 2005, Metro had made 2,210 eligibility determinations: about 1,000 of these were for new applicants, 1,200 were for recertification.

### Application Process

Individuals who wish to apply for Call-A-Ride Plus, Metro's ADA complementary paratransit service call Metro's ADA Services Offices to get a copy of the ADA Paratransit Application (Attachment D). The application is also available in large type and Braille for individuals with vision disabilities. The applications also ask if "you need future written information provided to you in an accessible format," with choices of computer disc, audio cassette, Braille, and large print. This application (regular type version) includes instructions (two pages), questions for the applicant to answer (seven pages), and a professional verification (three pages).

The form requests that the applicant return the completed application together with the written professional verification. The form also has specific requirements for verification of certain medical conditions, e.g.:

- Applicants with a seizure disorder must have verification from a neurologist
- Applicants with a cardiac condition should include their "American Heart Association Classification"
- Applicants who had a stroke should include their "American Heart Association Stroke Outcome Classification"

The first page of the professional verification is a cover letter to the professional from the director of the Transit Access Center (TAC). In part, the letter states, "The ADA mandates that each person who applies for the paratransit service to complete a functional assessment of transit-related skills." While the DOT ADA regulations require transit systems to limit eligibility to individuals who have disabilities that prevent their use of fixed route service, there is no requirement for a "functional assessment of transit-related skills."

When Metro receives an application form, an ADA Services staff member date stamps the form and logs it in the TAC database. A staff member then reviews the form. If the form is missing information and/or the professional verification, the ADA Services office contacts the applicant (by mail or phone) to try to obtain the missing information. If the form is complete (or can be completed during the phone call), the staff member tries to schedule the in-person assessment for the applicant. Nearly all applicants, both new and renewals, have in-person assessments. The general exceptions are individuals with severe cognitive disabilities or with Alzheimer's disease.

The in-person assessments take place at the TAC's office in St. Louis. Metro leases the office, but contracts with Washington University to perform and manage the assessments. Washington University has a two-year contract, with three option years. The TAC staff includes a director, three assessors, and one clerical staff. The director and assessors are members of Washington University's Occupational Therapy Program. They have the following specialties:

- Cognitive disabilities
- Orientation and mobility
- Visual disabilities
- Psychological issues

The TAC office has equipment and devices that simulate the transit environment, e.g., steps into a bus or van, curb ramps, and street and bus signs. The staff assesses an applicant's ability to use fixed-route services. Part of the assessment may include the applicant going outside the building to walk on the sidewalk and cross a street. On average, one assessment lasts one hour, including 15 minutes to prepare a written report.

TAC staff submits each assessment report to the director of ADA services. Each report includes a recommendation for eligibility status. The director reviews a sample of the recommendations, but generally accepts TAC's recommendations. Metro can make the following types of eligibility determinations:

- Unconditional
- Conditional
- Temporary
- Visitor
- Not eligible

Applicants who receive unconditional eligibility generally receive eligibility for up to five years, after which they must recertify.

Table VI.1 shows the distribution of eligibility determination outcomes from January 2004 to March 2005, during which period TAC made most of the recommendations. During this period, 97.2 percent of applicants received some level of eligibility for Call-A-Ride services.

Attachment E presents the form letter that Metro sends to applicants who receive unconditional eligibility.

Attachment F presents the form letter that Metro send to applicants who receive conditional eligibility. This letter includes an explanation of Metro's appeals process. At the time of the review team's on-site visit, Metro was making determinations of conditional eligibility for Call-A-Ride service. However, Metro was scheduling service to people with conditional eligibility as if they had unconditional eligibility. The managers said that they planned to enforce conditional eligibility as one of the new features of the upgraded Trapeze paratransit software, planned for later in 2005.

**Table VI.1 – Call- A-Ride Eligibility Determinations, January 2004 to March 2005**

<b>Determination</b>	<b>Number</b>	<b>Percent of Total</b>
Full eligibility, new applicant	354	16.0
Full eligibility, recertification	996	45.1
Conditional, new applicant	534	24.2
Conditional, recertification	31	1.4
Temporary	231	10.5
Visitor	2	0.1
<b>Total with Some Eligibility</b>	<b>2,148</b>	<b>97.2</b>
<b>Not Eligible</b>	<b>62</b>	<b>2.8</b>
<b>TOTAL</b>	<b>2,210</b>	<b>100.0%</b>

Attachment G presents the template for the letter that Metro sends to applicants who are determined ineligible. This letter includes an explanation of Metro’s appeals process. This letter provides the following reasons for the determination:

- 1) *You are able to navigate the system;*
- 2) *You are able to board an accessible vehicle;*
- 3) *You are not prevented from getting to or from a MetroBus or MetroLink stop by environmental factors.*

Metro should specify the reasons for the determination based on the applicants information as it relates to the eligibility criteria, not simply state that the person is able to use fixed route service (49 CFR §37.123(d)). Metro should have this information readily available in the reports prepared for each applicant by TAC.

Attachment H presents the form letter that Metro sends to applicants who receive temporary eligibility. This letter should refer to or include the appeals process, but does not.

Attachment I in the form letter that Metro sends to applicants who were determined not eligible because the mobility aid that they use did not meet the DOT ADA regulations (49 CFR §37.3) definition of a “common wheelchair.” This letter also should refer to or include the appeals process, but does not. This determination fails to make the distinction between the eligibility of the applicant and the applicant’s mobility aid. The determination of eligibility should be made solely based on the applicant’s ability to use fixed route service and not on the mobility aid that the applicant uses. If the applicant is determined eligible and uses a mobility aid that does not meet the definition of a “common wheelchair,” the applicant should be advised that their trip requests cannot be accommodated when using such a mobility aid. This letter does state that “you are encouraged to reapply for ADA eligibility with a different mobility aid in the future.”

All applicants who receive some level of eligibility receive an ID card (sample card shown in Attachment J) and a flyer about Metro’s ADA complementary paratransit service and accessible fixed route services (Attachment K). For individuals who are conditionally eligible, the ID lists the condition codes. However, there is no explanation for these codes on the card – which can be a problem if the individual wants to use the ID card in another jurisdiction.

Approximately two months prior to the end of the expiration of an individual's eligibility term, Metro sends a renewal notice to the individual. All riders must submit a full application to renew their eligibility, though Metro does not require an in-person assessment for all renewals.

## Appeals Process

Accompanying the letters for conditional eligibility and denial is Metro's appeals process for ADA complementary paratransit eligibility (Attachment L). In part, the appeals process states, "The written appeal should state the reason or reasons you believe the determination to be incorrect." Metro should not require the written request for appeal to include a reason for the appeal.

The Appeal Committee consists of three members: one person from Metro's legal department and two members from Metro's Advisory Accessibility Group. According to Metro appeals process, the committee will first review any information provided with the initial written appeal. If the committee can determine that the individual should be unconditionally eligible based on the information provided, the committee will make that decision without holding a hearing. Otherwise, the committee will hold a hearing during which the applicant (or his/her representative) may present information and arguments supporting his/her case. Based on this hearing, the committee will make a decision. If the committee takes more than 30 days to make a decision, the applicant will be permitted to use Call-A-Ride Plus service (presumptive eligibility) until the decision is made.

As of the time of the review team's on-site visit, there had not been a formal appeal for more than three years. The director of ADA services said when someone has called or written to appeal an eligibility determination, she has reviewed the application file and any additional information on her own. Based on her review, she has made adjustments to the initial determinations. She said that this process has been acceptable to those applicants. While perhaps not intentional, given the lack of any formal appeals for more than three years, this practice of "informal" appeals gives the appearance that Metro is avoiding the process that it has developed. Furthermore, while the director of ADA services does not review most eligibility decisions made by TAC, she has formal responsibility for approving all determinations. Her role in these informal appeals is contrary to 49 §CFR 37.125(g)(2): "the process shall include an opportunity to be heard and to present information and arguments, separation of functions (i.e., a decision by a person not involved with the initial decision to deny eligibility)..."

## Suspension Policy

Metro has a policy to suspend Call-A-Ride service to riders who exceed a threshold of no-shows or late cancellations. A rider accumulates one "point" for a same-day cancellation. A rider accumulates eight points for a no-show or a cancellation less than two hours before the scheduled pickup time.

- A rider gets a warning letter from Metro after accumulating eight points
- A rider gets a second warning letter from Metro after accumulating 16 points

- A rider is subject to a 14-day suspension, after a 14-day grace period, after accumulating 24 points within a 60-day period

The tracking and decisions on service suspensions due to no-shows is handled by Call-A-Ride operations rather than ADA services. ADA services, however, is responsible for managing the appeals process.

## Observations

The review team reviewed a sample of 34 completed applications for ADA complementary paratransit service. The purpose of the reviews was to:

- Assess the timeliness of Metro’s eligibility determination process
- Assess the reasonableness of these determinations

## Processing Time

The review team looked at 34 applications: 12 submitted from March 2004 to December 2004, and 22 submitted in February 2005, the most recent month available at the time of the review. To analyze Metro’s timeliness in making determinations, the team analyzed up to five milestones, as appropriate, for each application:

- Date that Metro received a written application
- Date that Metro contacted applicant to set in-person assessment – if information is available
- Date of initially scheduled in-person assessment – if different from actual date of in-person assessment
- Date of in-person assessment
- Date of eligibility determination

Table VI.2 provides a summary of the review team’s analysis. As stated earlier in this section of the report, Metro has defined its eligibility process such that the application is complete after the in-person assessment. This makes the third column of Table VI.2 the determination time by Metro’s standards. In the 2004 sample, Metro made determinations within 21 days for only 4 of the 12 applications, with four applications requiring at least 90 days and two applications requiring up to 170 days. In the 2005 sample, Metro greatly improved the timeliness of its application processing, making determinations for 20 of 22 completed applications within 21 days; the other two applications required 22 days.

**Table VI.2 – Processing Time for Sample of Eligibility Applications**

	<b>Days from Written Application to 1st Scheduled In-Person Assessment</b>	<b>Days from In-Person Assessment to Determination: (BOLD indicates &gt; 21 days)</b>	<b>Total Days: Receipt of Written Application to Determination</b>

<b>March to December 2004 (12 applications)</b>	<i>Average (mean):</i> 63 days	<i>Average (mean):</i> 60 days	<i>Average (mean):</i> <b>129 days</b>
Unconditional (1)	43	20	63
Conditional (1)	22	<b>170</b>	192
Not Eligible (10)	18, 23, 24, 32, 34, 42, 43, 64, 109, 299	8, 15, 15, <b>23, 23, 46, 89, 94, 96, 170</b>	38, 65, 76, 76, 87, 118, 128, 167, 198, 345
<b>February 2005 (22 applications)</b>	<i>Average (mean):</i> 33 days	<i>Average (mean):</i> 14 days	<i>Average (mean):</i> <b>49 days</b>
Unconditional (10)	23, 26, 27, 28, 29, 30, 35, 35, 37, 39	1, 7, 13, 13, 19, 20, 20, 21, 21, <b>22</b>	<b>36, 42, 42, 44, 46, 47, 48, 56, 57, 59</b>
Conditional (11)	23, 24, 26, 30, 34, 35, 36, 37, 43, 44, 48	0, 7, 8, 9, 12, 12, 15, 17, 17, 18, 20	40, 41, 42, 42, 46, 48, 52, 55, 57, 62, 65
Temporary (1)	36	<b>22</b>	58

However, when one looks at the elapsed number of days between Metro's receiving a written application and the date of the in-person assessment, there seems to be a significant time between application submittal and appointment. The average period in the 2004 sample was 63 days from receipt of written application to the scheduled in-person assessment. This decreased to 33 days in the 2005 sample. But there still appears to be a sizable period of time that an applicant must wait: the *shortest wait was 23 days* in the 2005 sample. Metro did not have any documentation to show the reason for these delays: whether it was the choice or delay on the part of the applicants, or whether it was Metro's lack of flexibility in scheduling in-person assessments.

These delays compound the total number of days for an applicant to receive a determination. As shown in the right-hand column of Table VI.2, the total number of days—from receipt of the written application to determination—tended to take six to nine weeks (42 to 63 days) for most applications in 2005. Even if Metro is meeting its own standard, the public may perceive the eligibility process as being unacceptably slow.

## Determination Outcomes

Of the 34 applications that the team reviewed, Metro made the following determinations:

- Unconditional eligibility: 11
- Conditional eligibility: 12
- Temporary eligibility: 1
- Not eligible: 10

All of these determinations appear to be reasonable. One of the people determined to be conditionally eligible was initially determined not eligible, but changed after the applicant submitted new documentation. As mentioned earlier in this section of the report, Metro was not



enforcing conditional eligibility at the time of the review team's on-site visit. As a result, any rider with conditional eligibility could, in practice, make any trip requested.

## Findings

1. Metro's policy is to make determinations of ADA complementary paratransit eligibility based on whether the applicant's mobility aid meets the definition of a "common wheelchair." This determination fails to make the distinction between the eligibility of the applicant and the applicant's mobility aid. The determination of eligibility should be made solely based on the applicant's ability to use fixed route service as addressed in 49 CFR §37.123, and not on the mobility aid that the applicant uses. The decision to limit service to mobility aids that meet the definition of a common wheelchair should be addressed by Metro as a separate issue from eligibility.
2. Based on review of a sample of 34 applications for Metro's Call-A-Ride service submitted during 2004 and 2005, the determinations made by Metro seem reasonable. Other than the policy regarding common wheelchairs, Metro's eligibility determination process does not appear to deny or restrict ADA complementary paratransit service to eligible individuals.
3. Approximately 25 percent of applicants receive conditional eligibility. At the time of the on-site review Metro provided service to individuals who have conditional eligibility as if they had unconditional eligibility. As a result, any rider with conditional eligibility could be scheduled for any trip requested.
4. Metro has defined its eligibility process such that the application is complete after the in-person assessment. Based on this standard, Metro made determinations within 21 days for only 4 of the 12 applications in the review team's sample of applications filed between March and December of 2004. Four applications took at least 90 days and two applications took up to 170 days. In a February 2005 sample, Metro greatly improved the timeliness of its application processing, making determinations for 20 of 22 completed applications within 21 days.
5. The time from submittal of a written application and an in-person interview is significant and could be an impediment to ADA complementary paratransit eligible individuals obtaining access to service. The average number of days in the 2004 sample was 63 days between receipt of written application and the in-person assessment. This decreased to 33 days in the 2005 sample. Metro did not have any documentation to identify the reason for the extended period between application submission and in-person assessment.
6. The DOT ADA regulations (49 CFR §37.125 (c)) requires that applicants be treated as eligible for service if a determination of eligibility has not been made within 21 days following the submission of a complete application. The application and other public information provided by Metro do not inform applicants of their right to service if they have not received a determination on their completed application within 21 days.
7. Metro has a process in place for appealing eligibility determinations. However, as of the time of the review team's site visit, there had not been a formal appeal for more than three years. As a result it was not possible to review determinations made on requests for appeal.

8. In its letter to applicants who are determined ineligible for ADA complementary paratransit service, Metro does not provide specific reasons for why the applicant is determined ineligible for service. Absence of such information could impede applicant's decision on whether or not to appeal the determination.
9. In its letter to applicants who receive temporary eligibility for ADA complementary paratransit service and in its letter to applicants who are denied eligibility for ADA complementary paratransit service because the mobility aid that they use, Metro does not refer to or include information on its appeals process. As a result, applicants who are determined ineligible may not be aware of their right to appeal the decision.
10. Metro's appeals process description states, "Appeals must be made in writing" and "The written appeal should state the reason or reasons you believe the determination to be incorrect." To require the appeal be made in writing and state the reason for the appeal could deprive the appellant of an opportunity to be heard and present information and arguments that the appellant would otherwise have if the appeal were made orally and without advance written reasons.
11. Metro's Director of ADA services handles request for appeals on an informal basis. The Director of ADA services has the formal responsibility for approving all initial eligibility determinations. This practice is at variance with the requirements of the DOT ADA regulations that decisions on appeals be made by a person not involved in the initial decision to deny eligibility, or "separation of functions."
12. Finding withdrawn (see Reporting Chart accompanying the Final Report).
13. Metro considers same day cancellations in its procedure for service suspensions. The DOT ADA regulations allow transit systems to suspend service for a reasonable period for riders who abuse the system by regularly "no-showing" for scheduled trips. While transit agencies have in recent years also considered "late cancellations" to be an abuse of the system and have considered this in their suspension policies, the effects of a late cancellation should be operationally equivalent to a no-show in terms of the negative impact on the service. Cancellations made several hours in advance of the scheduled pick-up time would still seem to allow the system's dispatchers to use the open vehicle time to respond to same-day operating issues. Accordingly, same day customer cancellations made several hours before the scheduled time should not be considered as a basis for suspending customer service.
14. Metro's ID card for ADA complementary paratransit service includes condition codes for individuals who are conditionally eligible. However, the card does not provide an explanation for these codes.

## Recommendations

1. Metro should revise or eliminate the policy of determining ADA complementary paratransit eligibility based upon the mobility aid used by the applicant. If Metro chooses to limit service to customers who use "common wheelchairs," it should so advise the customer in the application process and in the letter notifying the applicant of his or her eligibility for service.

2. Metro should take action to reduce the time from receipt of a written application to conducting an in-person assessment. As one means of doing this, Metro could set the date for the in-person assessment before the written application and professional verification has been submitted. Another means of reducing the time span is to have the applicant bring the written application form and professional verification to the in-person assessment. Yet another possibility is to schedule the in-person assessment within one or two weeks of receipt of the application.
3. Metro should revise its application and associated public information materials to advise applicants of their right to service if they have not received a determination on their completed application within 21 days. Metro should inform applicants of this right when 21 days from the filing of a completed application lapses if a determination of eligibility has not yet been made.
4. Metro should provide specific reasons for why the applicant is determined ineligible for service in its letter to applicants who are determined ineligible for ADA complementary paratransit service.
5. Metro should revise its letters for applicants who are receiving conditional eligibility to include information on the appeals process.
6. Metro should revise its appeals process to avoid the implication of negative consequence if the reason for the appeal is not provided with the appeal. This might be done by using phrasing such as “the appellant is requested to provide reasons you believe the determination is incorrect. This information will assist in processing the appeal.”
7. Metro should revise its appeals process to provide “separation of functions” and eliminate the practice of the Director of ADA services handling request for appeals on an informal basis.
8. Metro should revise its procedures for suspensions to consider only late cancellations that are operationally equivalent to a no-show in terms of the negative impact on the service. Same day customer cancellations made several hours before the scheduled time should not be considered as a basis for suspending customer service.
9. Metro should revise its ID cards so that the conditions for ADA complementary paratransit service are clearly presented on the card.

## VII. Telephone Access

The review team collected information about telephone access to Metro's Call-A-Ride service for this part of the review. Telephone access for placing or changing trip reservations or checking on the status of a ride is an important part of ADA complementary paratransit operations. The inability to get through on the phone to place trip requests without significant delays could discourage people from using the service and could therefore be considered a form of capacity constraint.

The review team conducted the following activities:

- Reviewed consumer input
- Reviewed performance standards
- Reviewed the design of the phone system
- Reviewed phone system monitoring (Automatic Call Distribution) reports
- Reviewed call center staffing
- Observed call center personnel handling of calls

### Consumer Comments

Several respondents interviewed by the review team before the site visit reported that there were significant hold times when calling to make a reservation. Long waits were especially bad when calling during the first hour of the call center opening in the morning (7:30 to 8:30 a.m.).

Several interviewees were unclear on the timing of the 30-minute window. They believed that the window began 30 minutes before the pickup time, not the 15 minutes before and 15 minutes after the pickup time. The reservation agents did not appear to consistently explain the 30-minute window to customers.

### Phone Service Standards and Performance Monitoring

Metro has established a goal for hold times, or "wait time in queue" of an average of 4.18 minutes. Average hold times of 4.18 minutes could be achieved with a large proportion of the calls having hold times well in excess of 4.18 minutes. Metro does not have a standard for number or percent of calls by increments of time in queue. Metro's call monitoring system is not equipped to compile records of individual calls by time in queue.

At the time of the review, Metro was preparing to install a new computer reservation system. This may present the transit agency with additional options for the types of reports and performance monitoring systems it uses.

### Phone Service Design

The Metro Call-A-Ride call center is at its Call-A-Ride office. All aspects of Call-A-Ride are located within this single complex--reservations, scheduling, dispatch, administrative offices,

maintenance, vehicles, and drivers. The Call-A-Ride reservations center operates from 7:30 a.m. to 4:30 p.m., seven days a week.

Six advertised telephone numbers were served by the Call-A-Ride Center at the time of the review. These included four lines for regular reservations, one line for TTY service, and one line for customer assistance and cancellations. The numbers are:

North County	314-534-4144
West County	314-534-1544
South County	314-534-2255
Call-A-Ride Plus	314-652-6200
TTY line	314-534-5055
Customer Assistance/Cancellations	314-289-5230

The reservations numbers are for customers to use to schedule new reservations or to make modifications to existing reservations. The Customer Assistance/Cancellations line is a separate line that allows someone to cancel a ride and not have to go through the regular call center.

At the time of the review, Metro was using a DOS-based computer system for reservations. This system appears to be antiquated and slow. Because of the slowness of the system, the average time to complete a reservation was quite lengthy. Metro was in the process of upgrading its computer reservations system. The new system was undergoing quality control testing and was expected to be implemented during the summer of 2005.

The reservation system has a total of 18 computers at 16 work stations. Two of the work stations, which are used by staff to proof the schedules, have two computers at the work station.

Call-A-Ride has different standards for how far in advance a customer may request a reservation. A customer covered under Medicaid may request a trip up to 14 days in advance. A Call-A-Ride Plus customer may make a reservation up to seven days in advance.

## **Telephone Service Performance Monitoring**

Metro's call monitoring system does not have the capacity to compile records of individual calls by time in queue. The reporting system appears geared more towards assessing worker productivity rather than customer service. Call-A-Ride tracks an average hold time for customers by 30-minute periods. It does not track the time of the longest hold time. Information on reservation line hold times by half hour was available for Sunday, April 11, 2005. Additionally, information on daily average hold times was available for weekdays during the week of February 7 to 11, 2005. Information from Metro reports for these dates is summarized in Table VII.1.

A review of the Metro reports indicates that the Sunday sample day appears to be comparable to an average weekday with respect to average hold times. Average hold times on April 10 ranged from 1.28 to 1.48 minutes by phone line. For the week of February 7 through 11, weekly averages ranged from 1.11 to 1.69 minutes. The highest daily average for a phone line was 2.45

minutes on Tuesday, February 8. An average of 2.45 minutes indicates a potentially large number of calls with long hold times on these days. Sundays may not represent the same pattern of distribution of calls throughout the day as weekdays. To the extent that April 10 is representative of call distribution it appears that long hold times appears to be limited to a few half-hour periods in the course of the day. Of the 72 half-hour increments on the four lines, 9 or 12.5 percent, had average hold times of more than one minute.

**Table VII.1 – Call-A-Ride Reservation Line Hold Times Reported by Metro**

Date	Day	Period		Average Hold Time (minutes)			
				#4230	#4240	#4250	#4260
		<i>Reservations Line #</i>					
2/7/2005	Monday	7:30 AM	4:30 PM	0.97	0.82	1.32	0.90
2/8/2005	Tuesday	7:30	4:30	1.63	1.52	<b>2.45</b>	1.75
2/9/2005	Wednesday	7:30	4:30	0.70	0.67	1.10	0.65
2/10/2005	Thursday	7:30	4:30	1.65	1.50	2.02	1.37
2/11/2005	Friday	7:30	4:30	1.13	1.03	1.58	1.10
2/7-2/11/2005		7:30	4:30	<b>1.22</b>	<b>1.11</b>	<b>1.69</b>	<b>1.15</b>
4/10/2005	Sunday	7:30	4:30	<b>1.33</b>	<b>1.48</b>	<b>1.28</b>	<b>1.38</b>
		7:30	8:00 AM	<b>4.50</b>	<b>1.98</b>	0.47	<b>1.53</b>
		8:00	8:30	0.32	0.00	0.03	0.40
		8:30	9:00	0.10	0.00	0.12	0.13
		9:00	9:30	0.05	0.28	0.08	0.15
		9:30	10:00	0.03	0.43	<b>3.43</b>	0.32
		10:00	10:30	0.37	0.13	0.00	0.08
		10:30	11:00	0.18	0.13	0.10	0.08
		11:00	11:30	0.08	0.08	0.07	0.07
		11:30	12:00 N	0.33	0.35	0.20	0.30
		12:00 N	12:30 PM	<b>2.92</b>	0.17	0.33	0.22
		12:30 PM	1:00	1.43	0.07	0.20	0.32
		1:00	1:30	0.20	0.07	<b>1.53</b>	<b>3.22</b>
		1:30	2:00	0.42	0.43	0.03	0.33
		2:00	2:30	0.13	0.00	0.08	0.05
		2:30	3:00	1.73	<b>6.73</b>	1.53	0.47
3:00	3:30	0.08	0.05	1.27	0.13		
3:30	4:00	0.10	0.18	0.73	0.12		
4:00	4:30	0.00	0.00	0.00	0.00		

Although operating hours for the reservation lines ends at 4:30 PM, the Metro reports identify zero calls between 4:00 and 4:30 pm.

Because of the long time for each call, Metro experiences a high number of abandoned calls. During the week of February 7 to 11, Metro received a total of 4,053 calls to the reservation center. Of those, 737 calls were abandoned by the caller: an abandonment rate of 18 percent.

In the week before the site visit, the review team placed calls to the reservation line at different times of the day and made hold time observations on five calls. Call answering times ranged from as little as one minute and as long as eight minutes, with an average of four minutes for the five calls. Table VII.2 documents these calls.

**Table VII.2 – Hold Time Observations**

<b>Date</b>	<b>Time</b>	<b>Minutes on hold</b>	<b>Notes</b>
4/5/2005	09:08 AM	6:19	
4/4/2005	09:38 AM	3:20	On hold for 3:00 then rings for 20 seconds, then answered
4/5/2005	10:08 AM	1:00	
4/1/2005	10:50 AM	8:03	
4/4/2005	3:53 PM	1:30	On hold for 1:00 minute, rings, then answered after 30 seconds

During the two-day period of April 12 and 13, 2005, the team observed the reservation process over 9-1/4 hours. During this time, team members observed a total of 76 calls during which reservationists handled a total of 119 trip requests. Each call averaged over seven minutes. Metro has a policy of limiting a client to book four reservations per call (the equivalent of two round-trips) during peak calling hours. This policy can result in more calls for each customer to make all of their trip reservations. The added calls can consume more of the reservationists' time, by exchanging introductory information and calling up customer records for each call, as well as the time of customers both waiting in queue and reserving trips.

## Call Center Staffing

The call center has one call center supervisor and 12 full-time reservation clerks. Clerks are on duty from 7:30 a.m. to 4:30 p.m. each day of the week. In addition to taking calls, reservation clerks rotate as customer service agents within the dispatch office. In dispatch they handle ride cancellations and "Where's my ride?" calls. Call-A-Ride maintains a separate phone line for these types of calls, which helps to reduce the call load on the reservations line and allows people to inquire about their ride without having to endure the long hold times experienced in reservations. With days off, customer service assignments, and breaks there are typically eight or fewer reservation clerks available to accept trip requests during the day.

During the on-site observation of the call center, review team members noted that the office clock was approximately nine minutes fast. Because the staff members use this clock, service at the end of the day was stopped before 4:30 p.m.. Conversely, call takers would begin taking calls before the stated 7:30 a.m. beginning time.

It was also noted that if a call was placed before 4:30 p.m. and put on hold, the call would receive a message at 4:30 p.m., stating that the reservation center was closed for the day and then the call would be dropped. As a result, no calls were answered after 4:21 p.m., because the clock

was incorrect, and calls in queue at 4:17 p.m. (Based on an average queue of over four minutes) would not be answered.

## Findings

1. Metro's policy goal of average times in queue of 4.18 minutes likely results in many calls in queue for periods of time well in excess of 4.18 minutes and would appear to significantly limit ADA complementary paratransit customers' ability to use Call-A-Ride service.
2. During the week of February 7 to 11, 2005, Metro received a total of 4,053 calls to the reservation center. Daily average hold times for the four phone lines ranged from 0.65 minutes to 2.45 minutes. Of the 4,053 calls, 737 were abandoned by the caller for an abandonment rate of 18 percent. This high abandonment rate is an indicator of difficulty in getting through on the phone lines to make reservations. Call Center staffing and equipment limits may be contributing to long hold times and high abandonment rates.
3. The review team observed 76 calls during the two-day period of April 12 and 13, 2005. These calls averaged over seven minutes to complete. The reservations system being used at the time of the review appeared to be antiquated and slow, contributing to the long call times. Metro was in the process of upgrading its computer reservations system with a scheduled implementation during the summer of 2005.
4. Metro's advertised Call-A-Ride reservations hours are 7:30 a.m. to 4:30 p.m. During the review, the Reservations Center closed at 4:21 p.m., based on a wall clock that was nine minutes fast.
5. Any calls left in the queue at the end of the day were abandoned. As a result, some customers calling before 4:30 p.m. are not being served.
6. Metro accepts only four one-way trip requests per call during peak call times. This policy can increase the length of telephone queues by requiring reservationists to handle multiple calls rather than one to serve one customer and placing multiple calls rather than one in the phone queue.
7. Metro tracks performance by measuring the callers' average time in the telephone queue. This performance measure does not capture the number of callers that have significantly long hold times, which provides a better index of customer service and telephone access.
8. It is Metro's practice for reservation clerks to rotate into the dispatch center and handle customer assistance calls. This appears to be very beneficial because it allows the reservation clerk to understand additional aspects of the reservation process and gives the clerk a greater sensitivity to the customer's needs.

## Recommendations

1. Metro should review and revise its policy goal for telephone access by adopting performance standards of percent of calls by time in queue, that is: "X %" calls answered within one minute, "Y %" in two minutes, etc. The upper bound should be set to avoid any significantly long hold times.



2. Metro should expand staffing and capacity of the telephone reservations system as needed to achieve telephone service levels that do not impede access to service.
3. Metro should continue with modifications to its computer reservations system to reduce the time required to complete trip reservations.
4. Metro should maintain the correct time on its clocks in the reservation area and in the reservations and scheduling software system.
5. Reservations Center staffing schedules should be revised to assure that all customer calls initiated between 7:30 a.m. and 4:30 p.m. are answered. This can be accomplished by scheduling staff to work after 4:30 p.m. until all calls in the phone queue at 4:30 p.m. are answered.
6. Metro should consider removing the limit to the number of trip requests made with each call as a means of reducing both call volume and time spent on calls.
7. Metro should track telephone system performance by measuring the number and percent of calls by the length of time that they are in the phone queue by hour of day.

## VIII. Trip Reservations and Scheduling

The team reviewed scheduling of Call-A-Ride trip requests. Information reviewed and observations on scheduling included:

- Consumer interviews and review of complaints filed with Metro
- Metro policies and procedures
- Scheduling software
- Interviews with Call-A-Ride managers, schedulers, reservationists, and dispatchers

### Consumer Comments

There were two closed complaints relating to Metro's ADA complementary paratransit service on file with FTA. Neither cited trip reservations or scheduling issues.

Of nine consumer interviews, the only concern at all related to scheduling addressed the location of transfer locations. Several interviewees complained that the locations being used as transfer points between vehicles were not appropriate places for ADA complementary paratransit customers. They felt that locating the transfer stations at busy, noisy locations was uncomfortable and disorienting for customers who have certain disabilities, such as blindness.

Of 69 Call-A-Ride complaints filed with Metro between July 2004 and March 2005, 32 (46 percent) related to service. These complaints included:

- Late vehicles
- Vehicles not arriving
- Proposed schedule changes
- Customer appealing of a penalty
- Miscellaneous service issues

### Policies and Procedures

At the time of the on-site review, Call-A-Ride had 2,800 to 2,900 trips requested on an average weekday. The number of trips ultimately served generally ranged from 2,200 to 2,300 on an average weekday. The ridership on Saturdays averaged 900 and on Sundays averaged 550. The difference between the requested trips and served trips was cancelled trips (both early and late), customer no-shows, and carrier missed trips.

Call-A-Ride trip scheduling involves three sets of Metro staff: reservationists, "proofers," and the PM dispatchers. The technique Call-A-Ride uses is real-time scheduling. As discussed earlier in this report, the Call-A-Ride reservationists accept trip requests from callers. While on the phone, the reservationists seek to fit the trip requests into the available set of vehicle routes. Call-A-Ride uses PASS software, which is a predecessor to Trapeze, for trip requests and trip scheduling. Metro accepts Call-A-Ride Plus trip requests from one to seven days before the date of the trip, seven days a week from 7:30 a.m. to 4:30 p.m.

Call-A-Ride divides its service area into six zones:

1. North County
2. West County
3. South County
4. County/City-North
5. County/City-South
6. Far West County

Attachment M presents a map of the Metro Call-A-Ride service area and the six zones. Call-A-Ride assigns vehicle routes by service zone. Table VIII.1 lists the assignment of vehicles by zone and by day of the week at the time of the review team’s visit. In Table VIII.1, the “Call-A-Ride (CAR) Plus” vehicles either stay within the City of St. Louis or travel between the city and other zones. “Expansion” vehicles are not pre-assigned to any zone, so they may be assigned on a day-to-day basis during the reservation process to wherever the demand for service indicates. “Relief Tour” vehicles are called “clean-up” vehicles by Call-A-Ride staff. They do not have trips assigned to them during scheduling, but are available during the day of service to be assigned as directed by the dispatcher.

**Table VIII.1 – Call-A-Ride Vehicle Assignments**

<b>Zone</b>	<b>Mon</b>	<b>Tue</b>	<b>Wed</b>	<b>Thu</b>	<b>Fri</b>	<b>Sat</b>	<b>Sun</b>
<b>North</b>	12	13	13	13	13	5	4
<b>West/Far West</b>	15	14	14	14	15	15	14
<b>South</b>	7	7	7	7	7	4	2
<b>City &amp; Cross-County (“CAR Plus”)</b>	16	16	16	16	16	6	5
<b>“Expansion”</b>	40	40	40	40	40	17	7
<b>“Relief”</b>	5	5	5	5	5	5	5
<b>TOTAL</b>	95	95	95	95	96	52	37

The vehicles listed in this table do not include vehicles assigned to Call-A-Ride’s Chesterfield Connector. The connector provides fixed route service between Ballas Metro Center and Chesterfield Mall. The vehicles for this service generally operate independently from the rest of Call-A-Ride.

Of the total set of requested trips, the chief of paratransit operations estimated that 45 percent are standing order (subscription) and 55 percent are demand. Standing order trips are trips that have the same schedule from day to day and week to week and are permanently scheduled until changed by the customer. Demand trips are scheduled by the customer individually. For a sample day prior to the on-site review (Wednesday, February 9, 2005), the split of trip requests was 43.8 percent subscription and 56.2 percent demand responsive. The subscription trip requests are pre-assigned to Call-A-Ride vehicle runs and are not handled by the reservationists.

Metro’s web site and the Metro Call-A-Ride brochure dated June 28, 2004, advise Call-A-Ride customers to “phone at least 24 hours in advance to schedule your trips.” The DOT ADA regulations (49 CFR §37.131(b)) require the transit entity (Metro) to schedule and provide trips

in response to a request for service made the previous day. Accordingly Metro must accept any trip requests made on the day before the requested service even if the time of the request is less than 24 hours in advance of the time of travel.

When a rider calls to request a trip, the reservationist enters the date, pickup and drop-off addresses, and requested pickup and drop-off time (if provided) into PASS. PASS searches for a vehicle assigned to the service zone of the rider's pickup address and places the trip on that vehicle. When more than one vehicle run can accommodate a particular trip request (i.e., estimated pickup time within the 15 minute pick-up window, drop-off time not later than any requested appointment time, travel time does not violate Call-A-Ride policy), PASS tries to group trips onto runs that already have trips rather than to spread the trips among all available runs. This is PASS's way to try to create efficient schedules. Reservationists, however, try to assign a trip request to a run that will make the estimated pickup and drop-off times as close as possible to the requested times. To accomplish this, a reservationist can bypass the vehicle run suggested by PASS and search through the other runs to place the trip request.

When a reservationist places the trip request onto a run, if there is no resulting policy violation, PASS codes the trip green on the screen. A trip with a travel time 45 to 75 minutes and/or with an arrival time up to two minutes after a specified appointment time is coded yellow by PASS. A trip longer than 75 minutes and/or arriving more than two minutes after an appointment time is coded red. PASS schedules all trips relative to the pickup time. When a trip request includes an appointment time, PASS tries not to have a late drop-off, but may do so.

A reservationist may get a trip request that cannot fit on any run within the allowable negotiation window of +/-60 minutes. A reservationist does not have the authority to move other trips already placed on runs. If there is no available run, the reservationist records this request as a trip denial. If the reservationist offers a trip that is within the negotiation window, but the caller turns down the offer, the reservationist records this request as a trip refusal (or "adversarial denial"). At the time of the review team's on-site visit, the proportion of recorded denials for ADA complementary paratransit trips was approximately 2.0 percent of the total demand each weekday. Metro data for the period June through December 2004 presented in Table IX.1 indicates that approximately 20 percent of denials are for next day service and 80 percent are for service requests made two or more days in advance of the service day.

Call-A-Ride has adjusted the vehicle speeds in PASS to match its operating environment. The standard road speed is 22 miles per hour. This speed is reduced as follows during peak travel periods and for new drivers:

- 70 percent: morning peak
- 80 percent: afternoon peak
- 70 percent: weeks 1 and 2 for a new driver
- 80 percent: weeks 3 and 4 for a new driver
- 90 percent: weeks 5 and 6 for a new driver

If a vehicle run both takes place during the peak and uses a new driver, then PASS applies two speed reduction factors (e.g., during the morning peak for week 1 of a new driver, effective road speed = 22 miles per hour x 70% x 70% = 10.8 miles per hour).

Proofers are Call-A-Ride reservationists who have been trained to be schedulers. During a given month, there are seven proofers; each proofer is assigned a day of the week and is responsible for finalizing the schedule for that day for the month (e.g., the “Monday proofer” finalizes the schedule for all Mondays in a month). A proofer starts to review vehicle runs up to seven days in advance, as new demand trip requests are placed on vehicle runs with the subscription trips already inserted. According to the supervisor for CAR reservationists, a proofer focuses on:

- Eliminating trips with long travel times
- Reducing and eliminating inefficient routes
- Creating slack time within routes to allow for additional trips

A proofer has the authority to shift the pickup times of trips within the full +/-15 minute pickup window. However, a proofer will not shift pickup times for certain clients, particularly workshop riders with subscription service. Also, a proofer may call a rider to ask approval for moving a pickup time outside of the previously agreed upon pickup window. This happens for a “handful” of trips each week, according to the reservationist supervisor. A proofer continues to work on the schedule until 4:30 p.m. of the day before service, when reservations stop accepting requests for next-day trips. The proofer then uses PASS to generate all the runs for the service day.

After the proofer generates the runs, the night dispatcher reviews the runs during the evening. The dispatcher has the authority to move trips within the +/-15minute pick-up window and move trips from run to run. The night dispatcher usually gains some flexibility to adjust runs because calls come in after 4:30 p.m. from riders cancelling trips. These cancellations open up room on the schedules prepared by the proofer.

At the time of the review team’s on-site visit, Metro managers were planning to upgrade the paratransit software to the Windows-based Trapeze (PASS is DOS-based) by summer 2005. Trapeze was already being used by Metro for other functions including the fixed route buses, fixed route customer information, and the complaints. Call-A-Ride had tried to change the software in 2003, but continued to use PASS after encountering problems in the transition.

For the rider, the benefit of real-time scheduling is that he or she receives an immediate confirmation of the pickup/drop-off times and windows. There is no need for further communication between Metro and the rider prior to the trip. However, there are major drawbacks to the technique for Metro. Since the selection of which run to place a trip depends on the placement of all previously requested trips (including the subscription trips), the overall vehicle runs are not optimal in terms of productivity or service quality. And once a reservationist concludes that a trip request cannot fit onto any run, the request becomes a denial. Neither the proofers nor dispatchers go back to the list of denials to see if they can be placed on a run.

Metro managers said that many of the riders who have their trip requests denied call back on a subsequent day and get a trip. There are three ways for this to occur:

- Metro opens up additional Call-A-Ride vehicle runs
- Space becomes available, either through adjustments by the proofer or by early cancellations
- The rider requests a different pickup time

It is likely that some denials are eventually served in practice. However, Metro has not tried to document this number, and it is not without significant effort on the part of the rider.

## Findings

1. Metro's web site and the Metro Call-A-Ride brochure dated June 28, 2004, advise Call-A-Ride customers to "phone at least 24 hours in advance to schedule your trips." The DOT ADA regulations (49 CFR §37.131(b)) requires the transit entity (Metro) to schedule and provide trips in response to a request for service made the previous day.
2. At the time of the review team's on-site visit, Metro regularly denied trip requests for ADA complementary paratransit service due to capacity constraints. The proportion of denials was generally two percent of total demand on weekdays. Of these denials approximately 20 percent were for next day service requests and 80 percent were for service requests two or more days in advance of the service day. Metro managers said that many of the riders who have their trip requests denied call back on a subsequent day and get a trip. However, Metro has not tried to document this number, and it is not without significant effort on the part of the rider.
3. Many trips denied early in the scheduling period can be scheduled later in the scheduling period as a result of trip cancellations and/or route modifications made by proofers. Denial of such trip requests precludes them being served unless the customer calls again at a later time to request the trip.
4. The Metro scheduling software does not include a function to schedule trips to meet appointment times. Reservationists record appointment times requested by callers in the software system and can attempt to place the trip on the run they feel is most appropriate. However, Metro has not set up PASS to schedule by appointment time.

## Recommendations

1. Metro's should revise its policy to accept all trip requests made on the day before the requested service day, regardless of whether or not the request is made 24 hours in advance of the requested trip time. Metro should revise its public information materials accordingly, including its web site and Call-A-Ride brochure.

2. Metro should discontinue the practice of denying trips by providing sufficient run capacity to accommodate all trip requests. This can be accomplished several ways, most easily by increasing the total number of runs. In addition to eliminating denials, this will eliminate multiple calls by customers attempting to schedule the same trip.
3. Metro should consider allowing reservationists to accept trip requests that they cannot schedule and place them on open runs to be scheduled to available covered runs at a later time by proofers. If, during the scheduling period, the number of trips on the open runs exceeds that which can be reliably served by same day dispatch, reservationists can be instructed to discontinue acceptance of trip requests that can't be scheduled.
4. Metro should modify its scheduling procedures to allow the scheduling and tracking of trips by appointment time.

## IX. Service Performance

The DOT ADA regulations for ADA complementary paratransit service indicate that capacity constraints can result from poor service quality. Specifically, they note that denials of trip requests, missed trips, or the provision of untimely trips or significantly long rides can constitute capacity constraints. Therefore, the review team examined the ultimate disposition of trip requests, on-time performance, and on-board travel times. These aspects of service provision were assessed as follows:

- Consumer input was obtained on each issue through telephone interviews and through a review of complaints filed with FTA and with Metro.
- Metro's service policies, procedures, and standards related to missed late and long trips were reviewed.
- Metro's on-time performance and travel time reports were reviewed.
- Actual pickup and drop-off times reported on a randomly selected day were used to tabulate on-time performance to compare to reported performance.
- The review team analyzed trip length, including a comparison of travel times between ADA complementary paratransit trips and comparable fixed route trips.

### Consumer Input

Consumer input is summarized in Section III of this report. Complaints relating to service performance are described below.

There were no service issues in two closed complaints on file with FTA.

Nine Metro Call-A-Ride users who were interviewed prior to the site visit cited two issues that could affect service performance. Several customers indicated an understanding of the pickup window different from that used by Metro. This could result in missed trips and customer no-shows as well as customer dissatisfaction with service performance. Some customers believed that they were expected to be ready to board vehicles 30 minutes before the schedule time they were given, not the 15 minutes before or 15 minutes after the scheduled time as used by Metro. As a result, customers might find alternate transportation after the scheduled travel time and be categorized as a "no-show" if the vehicle arrived within 15 minutes after the scheduled pickup time.

A second concern raised by interviewed customers was that drivers would wait less than three minutes for customers to board the vehicle and then classify the customer as a no-show. This could also result in overstating the number of customer no-shows.



Of the Call-A-Ride complaints filed with Metro from July 1, 2004, through March 31, 2005, 32 (46 percent) related to service. Service complaints included:

- Late vehicles
- Vehicles not arriving
- Proposed schedule changes
- Customer appealing of a penalty
- Miscellaneous service issues

## Metro Policies

**Trip Denials.** Metro's policy standard is zero denials for requests made the previous day. Metro accepts service requests seven days in advance of the service day. However, Metro's standard only applies to trips denied on the day before the service day. If a customer is denied service more than one day before the service day Metro does not consider this a trip denial. The discussion on trip denial in the Appendix to the regulations discusses practices that prevent people from gaining access to the service, such as limiting access to trip reservations, a capacity constraint or denial of service. "Metro Call-A-Ride Easy Tips" brochure encourages customers to call early to make trip reservations. Denying a trip more than one day in advance of the service day, thereby requiring multiple calls to schedule a trip, appears to limit access to the service and constitute a capacity constraint, that is not measured by Metro's policy for service denials.

**Missed Trips.** Metro appears to have no policy for missed trips.

**No-Shows.** According to "Metro Call-A-Ride Easy Tips," if a customer fails to cancel a trip more than two hours before the scheduled trip time, the trip is categorized as a no-show.

**On-Time Performance.** According to "Metro Call-A-Ride Easy Tips," customers are advised that the vehicle may arrive up to 15 minutes before or after the scheduled pickup time (-15/+15) and that the customer must be prepared to leave within this period.

Metro's computation of on-time performance includes trips with customers picked up more than 15 minutes early, as on time. It is Metro's policy to pick up customers early only if the customers wish to board early. Additionally, Metro does not count a trip as late unless it is more than five minutes later than the on-time window—or more than 20 minutes after the scheduled pickup time. Accordingly, for performance measurement, trips are considered on time if they are less than 20 minutes late (+20). Metro's goal for on-time performance is 94.6 percent. Metro has no on-time policy for dropping passengers off to meet appointments.

**Trip Duration.** Metro's travel time standards are maximum travel time of 45 minutes for intra-zonal trips, and 90 minutes for inter-zonal trips, with a goal of completing inter-zonal trips in 60 minutes or less.

## A. Performance

### Trip Disposition

Table IX.1 presents Metro information on monthly Call-A-Ride trip requests and denials for the period June through December 2004.

**Table IX.1 – Metro Reported Capacity Denials: June through December 2004**

Month	Trip Requests	Denials			
		Next Day	2 or More Days	Total Denials	% of Requests Denied
June	71,869	127	376	503	0.7%
July	67,509	50	211	261	0.4%
August	70,125	76	246	322	0.5%
September	69,993	77	366	443	0.6%
October	70,069	109	390	499	0.7%
November	71,241	119	493	612	0.9%
December	71,436	121	385	506	0.7%
<b>Totals</b>	<b>492,242</b>	<b>679</b>	<b>2,467</b>	<b>3,146</b>	<b>0.6%</b>

According to Table IX.1, 0.6 percent of trip requests during the period were denied. Of the trips denied, 78.4 percent were for trips requested two or more days in advance and 21.6 percent were for requests for next day service.

Metro staff indicated that many customers who are denied service two or more days in advance will call again until their trip schedule request is honored.

The review team used Call-A-Ride trip data for February 9, 2005, supplied by Metro in a spreadsheet to perform an independent analysis of trip disposition and service performance. The spreadsheet contains 5,597 rows representing records of trip information and 77 columns representing characteristics of each trip. Since most trips are coded in pairs in the spreadsheet, the 5,597 rows represent 2,515 unique trip requests. Since Call-A-Ride serves non-ADA trips as well as ADA trips the records were screened to eliminate non-ADA trips from the analysis. There are 2,116 resultant ADA trip requests. Refer to Attachment N for a detailed discussion of the review team's methodology and analysis of the Call-A-Ride data for the sample day.

The Table IX.2 shows the breakdown by trip disposition as coded in the spreadsheet.

### Refused and Denied Trips

The spreadsheet had 43 trip requests that were coded for some type of denial. This represents 2.0 percent of all 2,116 trips requested on February 9, 2005. Of these 43 denials, 42 were classified as "capacity denials" and 1 was an "adversarial denial."

Since the spreadsheet contained no data on pickup time requested, it was not possible to determine the responsiveness of the offered pickup time with respect to pickup time requests.

**Table IX.2 – Recorded Trip Disposition**

Trip Disposition Codes	Number of Rows or Records	Number of ADA Trip Pick-up Requests	% of Total ADA Trip Pick-up Requests
P = Performed	1,634	1,634	77.2%
C = Early Cancel	358	348 <sup>1</sup>	16.4%
W = No Show	0	0 <sup>2</sup>	
N = Late Cancel & Missed Trips	91	91 <sup>2</sup>	4.3%
Blank = Refused and Denied	86	43 <sup>3</sup>	2.0%
<b>TOTAL</b>	<b>2,169</b>	<b>2,116</b>	<b>100.0%</b>

NOTES:

- <sup>1</sup>Although most drop-off records coded with trip disposition code C have a non-ADA fare of blank, there are 10 drop-offs with an ADA fare of N. Therefore the 358 records of early cancel ADA trips actually represent 348 unique trip pick-up requests.
- <sup>2</sup>Records coded with trip disposition codes W and N were found to represent drop-offs and pick-ups respectively for the same scheduled set of trips, and so count as one set of 91 trips. Although no disposition code W records appear in this analysis because they have a non-ADA fare of blank, they are nevertheless represented by their pick-up counterparts with disposition code N having valid ADA fare codes as listed in Table N.1a. For further discussion, see section *Late Cancel, Missed Trips, and No Shows* below.
- <sup>3</sup>Records coded with a blank trip disposition code were found to have both a pick-up record and a corresponding drop-off record with the same fare. Hence the 86 records of refused and denied ADA trips actually represent a set of 43 unique trip requests.

The review team's analysis also noted that 13 of the capacity denial requests did have an appointment time request. Since there was no corresponding column in the spreadsheet that provided an estimated or promised drop-off time, there was no way to calculate whether the offer was responsive with respect to drop off time.

Based on the foregoing review, on the sample day of 2,116 trips requested, 42 or 2.0 percent were denied. This exceeds the 0.6 percent of next-day denials reported by Metro. As indicated by Metro, some of the customers whose trips are denied more than one day before the service day may successfully schedule their trip at another time. Others may opt not to make the trip or travel by other means.

### Scheduled Trip Requests – Not Completed

Deducting the 43 denied trips from the total 2,515 trips requested results in 2,073 scheduled trips for the sample day.

Trips that have been scheduled are either completed (performed) or not completed. Trips that are not completed can result from the action of the customer or the operator. Trips not completed because of the customer's action are cancellations and no-shows. Customer cancellations are

typically categorized as early or late. Early cancellations permit the operator to reallocate manpower and equipment with some inconvenience. This inconvenience is often offset by making available service capacity on the service day to address unforeseeable needs. Late cancellations (an hour or two before the scheduled time) severely limit the operator in reusing scheduled resources to serve other customers. As with customer no-shows, late cancellations are usually discouraged by the operator.

Trips not completed because of the operator's failure are missed trips. DOT ADA regulations (49 CFR §37.131(f)(3)(B)) prohibit transit entities from limiting service availability through patterns or practices that result in substantial number of missed trips. For purposes of measuring performance against the regulatory criteria, missed trips are defined as trips that were not served when the customer was available for the trip throughout the pickup window (-15/+15). That is, the vehicle did not arrive in the pickup window and the trip was not completed.

**Early Trip Cancellations.** The data in the spreadsheet show 348 trip requests that were cancelled early. This represents 16.4 percent of all 2,116 ADA trips requested on February 9, 2005. Because the spreadsheet contained no column for cancellation time, it was not possible to verify that these trips were indeed early cancellations. In fact, 9 of the 348 early canceled trips have a vehicle arrival time, suggesting that the cancellation may not have been "early enough" to avoid an attempted pickup trip or the cancellation was not communicated to the driver in timely manner. However, 6 of these 9 cancelled trips with a vehicle arrival time do not have a valid vehicle number, thereby calling some of the recorded information further into question.

**Late Cancel, Missed Trips, and No Shows.** Deducting the 348 early cancellations from the 2,073 scheduled trips leaves 1,725 trips dispatched. Of these, 91 trips requests were coded as late cancellations, missed trips, or passenger no-shows. This comprises 4.3 percent of the total 2,116 trips requested for the sample day.

To distinguish among the three categories, the team examined the data for actual vehicle arrival time and promised arrival time for each of these 91 trip requests.

- If the trip contained a vehicle arrival time within +/-15 minutes of the promised arrival time, the trip was assumed to be a "customer no-show."
- If the trip contained a vehicle arrival time outside the +/-15-minute window of the promised arrival time, the trip was assumed to be a "missed trip."
- If no vehicle arrival time was recorded for the trip, it was assumed that either the trip was cancelled in time to avoid the vehicle traveling to the pickup location or the vehicle simply never arrived at the pickup location. These trips could be either late cancellations or missed trips.

The results of the analysis of late cancellations, missed trips, and customer no-shows appear in Table IX.3.

**Table IX.3 – No-shows and Missed Trips**

	<b>No-shows</b> (Arrival +/-15 min. of Negotiated ETA)	<b>Missed trips</b> (Arrival outside +/-15 min. of Negotiated ETA)	<b>Late Cancel /Missed Trip</b> (No arrival data)	<b>Total</b>
Number of trips	34	10	47	91
% of trips with arrival data	77%	23%	0%	100%
% of all late cancels, missed trips, and no-shows	37%	11%	52%	100%

Of the 1,725 trips dispatched 34, or 2.0 percent of the trips were customer no-shows, 0 to 47 (0 to 2.7 percent) of the trips were late cancellations, and 10 to 57 (0.6 to 3.3 percent) were missed trips.

## On-Time Performance

On-time performance reported by Metro for the period July 2004 through January 2005 appears in Table IX.4. For on-time performance measurement, Metro considers trips on time if they are picked up between 15 minutes before until 20 minutes after the scheduled time (-15/+20). This period exceeds that told to customers (-15/+15). Metro also includes any trips that are picked up before the beginning of the window as on time.

**Table IX.4 – Metro On-Time Performance**

<b>Month</b>	<b>Total Trips</b>	<b>On-Time Trips</b>	<b>% On-Time</b>
July 2004	56,319	55,193	98%
August 2004	56,429	55,300	98%
September 2004	56,749	55,614	98%
October 2004	60,825	59,000	97%
November 2004	52,635	50,530	96%
December 2004	54,921	53,273	97%
January 2005	54,492	52,312	96%
<b>Total</b>	<b>392,370</b>	<b>81,223</b>	<b>97%</b>

Metro does not compute Call-A-Ride performance for on-time drop-offs.

The review team analyzed Call-A-Ride's ADA on-time performance for the February 9, 2005, sample data. Deducting the 91 trips that were not completed from the 1,725 trips dispatched results in 1,634 completed ADA trips on the sampled day.

For the 1,634 completed, or performed, passenger trips on the sample day, to identify on-time, early, and late pickups, the promised pickup was compared to the actual pickup time. Depending on the data available for each trip, the on-time status was calculated in the following way:

- For completed trips with no vehicle arrival time listed, the difference between promised

pickup time and the actual “collect time” (the time when the passenger boards the vehicle) was calculated.

- For completed trips with both arrival time and actual collect time data, the difference between promised pickup time and the earlier of arrival time or actual collect time was calculated.

As indicated in Table IX.5, for the sample day, 77.8 percent of trips were picked up within 15 minutes of the scheduled time or on-time. 93.7 percent of trips were picked up either early or on-time, while 6.3 percent of trips were picked up late.

**Table IX.5 – Calculated On-Time Performance: February 9, 2005**

	<b>On Time</b>	<b>Early</b>	<b>Late</b>	<b>Total</b>
<b>Number of Completed Trips</b>	1,271	260	103	1,634
<b>% of Completed Trips</b>	77.8%	15.9%	6.3%	100%

For early pickups, the concern is whether customers are pressured to accept early pickups by drivers or dispatchers. To the extent that customers find the early pickups convenient and have no objection, early pickups do not represent a constraint to use of the service. Table IX.6 presents the distribution of early pickups from the beginning of the pickup window. For example, “1-5 minutes early” is 16 to 20 minutes before the scheduled time and one to five minutes before the beginning of the -15/+15 pickup window. As indicated in the table, 88.6 percent of the early pickups were within 15 minutes of the window. Pickups more than 15 minutes early could be considered untimely pickups if the time were not convenient for the customer.

**Table IX.6 – Early Pickups**

	<b>1-5 minutes</b>	<b>6-15 minutes</b>	<b>16-30 minutes</b>	<b>&gt;30 minutes</b>	<b>Total</b>
<b>Number of early trips</b>	147	85	18	10	260
<b>% of early trips</b>	56.5%	32.7%	6.9%	3.9%	
<b>Cumulative % of early trips</b>	56.5%	89.2%	96.1%	100.0%	

With late pickups, the service and regulatory concern is whether or not there are a substantial number of significantly late pickups. Accordingly, late trips were reviewed to identify how late the pickup was relative to the -15/+15 pickup window.

As shown in Table IX.7, 81.6 percent of late pickups on the sample day are within 30 minutes of the scheduled time and 15 minutes of the end of the -15/+15 pickup window. Three pickups, or 0.2 percent of all trips, were more than 30 minutes late. These trips could be considered significantly late, but 3 trips of 1,634 trips do not appear to be a substantial number of significantly late trips.

Table IX.7 – Late Pickups

	1-5 minutes	6-15 minutes	16-30 minutes	>30 minutes	Totals
<b>Number of Late Trips</b>	45	39	16	3	103
<b>% of Late Trips</b>	43.7%	37.9%	15.5%	2.9%	
<b>Cumulative % of Late Trips</b>	43.7%	81.6%	97.1%	100.00%	
<b>% of Completed Trips</b>	2.8%	2.4%	1.0%	0.2%	6.4%

For the sample day, 93.7 percent of trips were performed early or on-time. Including trips with arrival times no more than five minutes after the pickup window—as Metro does in its performance measurement—would result in early or on-time performance of 96.5 percent for the sample day. This is comparable to Metro’s reported on-time performance of 97 percent. An on-time performance rate of 95 percent equates to one late trip every two weeks for a traveler who makes one round trip 5 days a week. This is a relatively high level of on-time performance for an urban ADA complementary paratransit service.

**Drop-off Performance.** Of the 1,634 completed trips, 739 had appointment times. To determine the number of on-time, early, and late drop-offs, the appointment time was compared to the arrival time. Depending on the on the data available for each of these trips, the on-time status was calculated in the following way:

- For completed trips with no arrival time listed, the difference between appointment time and the actual collect time (time when the passenger gets out of the vehicle) was calculated.
- For completed trips with both arrival time and actual collect time data, the difference between appointment time requested and the earlier of arrival time or actual collect time was calculated.

Based on this analysis, of the 739 drop-offs, 617 (83.5 percent) were early or on-time, while 122 (15 percent) were late. Both early and late drop-offs were analyzed to identify the number of significantly early and significantly late drop-offs.

Table IX.8 shows the distribution of early (before the appointment time) drop-offs. Of the 617 early drop-offs, 59.4 percent were on-time or less than 30 minutes early. Another 21.5 percent were 31 to 60 minutes early, and 2.6 percent were more than an hour early. The 23 trips more than an hour early are potentially a substantial number of trips that are significantly untimely. Drop-offs more than one hour early can result in customers left waiting on the sidewalk for the facility at their destination to open. Drop-offs more than an hour before appointments can be a constraint to use of the service by individuals who have disabilities.

**Table IX.8 – Distribution of Early Drop-offs**

	<b>0-15 minutes</b>	<b>16-30 minutes</b>	<b>31-60 minutes</b>	<b>&gt;60 minutes</b>	<b>Total</b>
<b>Early Drop-Offs</b>	233	206	159	19	617
<b>% of Completed appointments</b>	31.5%	27.9%	21.5%	2.6%	83.5%
<b>Cumulative % of early drop-offs</b>	37.8%	71.2%	96.9%	100%	

Late drop-offs for appointments can cause the customer to miss medical appointments, classes, or cause late arrivals for work. As shown in Table IX.9, for all trips with appointments, 16.5 percent of the drop-offs were late; 4.6 percent were more than 15 minutes late and 2.4 percent were more than 30 minutes late.

**Table IX.9 – Distribution of Late Drop-offs**

	<b>1-15 minutes</b>	<b>16-30 minutes</b>	<b>31-60 minutes</b>	<b>&gt;60 minutes</b>	<b>Total</b>
<b>Late drop-offs</b>	88	16	17	1	122
<b>% of Completed appointments</b>	11.9%	2.2%	2.3%	0.1%	16.5%
<b>Cumulative % of late drop-offs</b>	72.1%	85.2%	99.2%	100%	

## Trip Duration

The review team analyzed trip duration, or length, of Metro Call-A-Ride trips to identify the number of long trips on the sample day. The duration of long trips were compared to trips made between the same origin and destination at the same time of day using fixed route service. The purpose of the analysis was to identify the number of potentially significantly long trips.

To conduct this analysis, the review team chose a sample of the longest 32 Call-A-Ride ADA trips completed on February 9, 2005. This sample consists of trips that exceeded 80 minutes in travel time and represents two percent of the completed trips.

The review team identified equivalent fixed route trips by calling the Transit Information Line in Missouri (314-231-2345) listed on Metro's website and speaking with a customer service representative. The Metro representative was able to select the path with the shortest travel time using the fixed route system at the same approximate time as the negotiated pickup for each Call-A-Ride trip. In seven cases, the customer service representative indicated that there was no equivalent fixed route service available between trip origin and destination points.

The total fixed route travel time includes the actual stop-to-stop travel time, including time spent transferring. Twenty minutes were added to the stop-to-stop time to account for walking to and from the stops at either end of the trip and the initial wait for the bus. Of the 32 long trips



sampled (including 6 for which there is no comparable fixed route service), 21 trips (65.6 percent) had a travel time that exceeded the equivalent fixed route travel time. These longer paratransit trips are indicated with shaded rows in Table IX.10.

The results of the review for the 26 trips for which a fixed route option was available are summarized in Table IX.11.

**Table IX.11 – Distribution of Long Trips**

	<b>Number</b>	<b>% of Sample</b>
<b>Equal to or faster than equivalent fixed route service</b>	5	19.2%
<b>Slower than equivalent fixed route service by 1 to 15 min.</b>	2	7.7%
<b>Slower than equivalent fixed route service by 16 to 30 min.</b>	4	15.4%
<b>Slower than equivalent fixed route service by 31 to 45 min.</b>	8	30.8%
<b>Slower than equivalent fixed route service by 46+ min.</b>	7	26.9%
<b>Total</b>	26	100.0%

Of the sampled 26 long trips, 14 trips exceeded Metro’s standard of 90 minutes for intra-zonal trips. This represents 0.9 percent of the completed trips on the sample day. Of the sampled 26 trips for which a fixed route option was available, fifteen trips were more than 30 minutes longer than a comparable fixed route trip; seven of these trips were more than 46 minutes longer. These potentially significantly long trips represent 0.9 percent and 0.4 percent of completed trips, respectively.

Table IX.10 – Analysis of Trip Duration for Long Trips

Trip ID	Origin	Destination	Fixed Route #'s	Para-transit Trip Duration	Fixed Route Time			a) (Paratransit Time) – (Fixed Route Time)
					b) Transit	Walk	Total	
194	5700 Pamplin Pl, St Louis	10200 W Florissant Ave, Dellwood	74	1:22	0:14	0:20	0:34	+0:48
304	<b>8500 Mackenzie Rd, County</b>	4200 Tholozan Av, St. Louis	10	<b>1:32</b>	0:15	0:20	0:35	+0:57
772	1500 Gene Crayton Ave, County	9400 Dielman Industrial Dr, Olivette	36, 16, 91	<b>2:18</b>	1:18	0:20	1:38	+0:40
1001	8800 Fleischer Pl, Berkeley	200 Hewlett Ct, Creve Coeur	47, 93	<b>2:04</b>	0:47	0:20	1:07	+0:57
1106	5700 Delmar Av, St Louis	400 Limestone Pl, Kirkwood	97, 47	1:22	1:04	0:20	1:24	-0:02
1213	6300 Howdershell Rd, County	200 Afshari Dr, County	No service	<b>1:49</b>	-	-	-	-
1595	2600 Clark Av, St Louis	3200 Parkwood Ln, Maryland Height	No service	<b>1:38</b>	-	-	-	-
1785	4200 Forest Park Av, St Louis	1300 Partridge Av, University City	42, 94	<b>1:34</b>	0:54	0:20	1:14	+0:20
2483	11200 Estrada Dr, County	10200 W Florissant Av, Dellwood	241X, 61	1:26	0:29	0:20	0:49	+0:37
2570	1200 Spruce, St Louis	100 Taney Dr, Florissant	274X	1:25	0:50	0:20	1:10	+0:15
3396	<b>8500 Mackenzie Rd, County</b>	2700 Meramec St, St. Louis	10, 70	<b>1:52</b>	0:29	0:20	0:49	+1:03
3466	1000 Executive Parkway Dr, County	2700 Thomas St, St Louis	91, 16, 32	<b>2:04</b>	1:27	0:20	1:47	+0:17
3682	3200 DeBaliviere Ave, St Louis	9200 Harold Dr, Woodson Terrace	MetroLink,	<b>1:52</b>	0:49	0:20	1:09	+0:43
4266	3200 January Av, St Louis	9700 Page Ave, Overland	90, 94	<b>1:48</b>	0:46	0:20	1:06	+0:42
4466	9700 Calumet Drive, Bellefontaine	4200 Forest Park Av, St Louis	36, 40, 42	<b>1:46</b>	0:54	0:20	1:14	+0:32
4676	8800 Fleischer Pl, Berkeley	2400 Wengler Av, Overland	47, 33	1:29	0:39	0:20	0:59	+0:30
4967	800 N New Ballas Rd, Creve Coeur	2600 Whittier St, St Louis	91,	1:29	2:26	0:20	2:46	-1:17
5071	3100 Autumn Shores Dr, Maryland	6300 Olive Blvd, University City	No service	1:25	-	-	-	-
5203	2100 Arsenal St, St. Louis	<b>8500 Mackenzie Rd, County</b>	30, 10	1:30	0:37	0:20	0:57	+0:33
5204	<b>8500 Mackenzie Rd, County</b>	2100 Arsenal St, St. Louis	10, 30	<b>1:46</b>	0:37	0:20	0:57	+0:49
5269	11300 Big Bend Blvd, Kirkwood	2800 Woodbridge Estates Dr, County	No service	<b>1:33</b>	-	-	-	-
5560	3100 Market St, St Louis	1900 Schoettler Valley Dr, Chesterfield	No service	<b>2:39</b>	-	-	-	-
5657	700 Teson Road, Hazelwood	9600 Lackland Rd, Overland	66	<b>1:35</b>	0:34	0:20	0:54	+0:41
5978	10400 Trenton, Creve Coeur	7300 Esterbrook Dr, Jennings	94, 64	1:22	0:35	0:20	0:55	+0:27
7403	5800 Manchester Av, St Louis	500 Ruthland Dr, County	90, 40	1:23	1:17	0:20	1:37	-0:14
8016	3100 Arsenal St, St Louis	2000 Kratky Rd, Creve Couer	30,	<b>2:23</b>	1:20	0:20	1:40	+0:43
8177	8400 Crixdale Av, University City	2000 Walton Rd, Overland	91, 94	<b>2:13</b>	0:27	0:20	0:47	+1:26
8564	300 Dunn Rd, Florissant	1100 Maple Ave, County	47, 36	1:29	1:09	0:20	1:29	0:00
8993	4600 World Parkway Circle, Berkeley	4300 Cote Brilliante, St Louis	49,	1:29	0:55	0:20	1:15	+0:14
9045	7200 Weil Ave, Shrewsbury	14800 Chesterfield Trails Dr,	No service	1:22	-	-	-	-
9677	4200 Forest Park Av, St Louis	11000 Sugar Pine Ct, Florissant	52,	1:29	1:12	0:20	1:32	-0:03
9996	<b>8500 Mackenzie Rd, County</b>	3800 Missouri Av, St Louis	10, 70	<b>1:56</b>	0:47	0:20	1:07	+0:49

Note: street addresses rounded to nearest 100 block

As indicated in Table IX.10, five of the trips that were more than 30 minutes longer than a comparable fixed route trip were to or from the same location (address listed in **BOLD**). Of these five trips, four were more than 45 minutes longer than the comparable fixed route trip—creating what appears to be a pattern of significantly long trips. This pattern may result from transporting a large number of passengers on a trip to and or from an activity center. Transporting large numbers of people on one vehicle can result in long travel times for the first to board on the going trip or last to alight on the return trip. Trip lengths can be shortened by splitting large groups into smaller groups to provide a more direct trip for the first to board or last to alight on the going and return trips, respectively.

## Findings

1. Metro's policy standard for service denials does not appear to consider all denials. Metro's policy standard is zero denials for requests made the previous day. Metro accepts service requests seven days in advance of the service day, and "Metro Call-A-Ride Easy Trips" brochure encourages customers to call early to make trip reservations. Denying a trip more than one day in advance of the service day, thereby requiring multiple calls to schedule a trip, appears to limit access to the service and constitute a capacity constraint.
2. The review team's analysis of a one-day sample indicates that 42 (2 percent) of trip requests for service on February 9, 2005 were denied. During the period June through December 2004 Metro reported next day denials of 0.6 percent. Metro indicated that some customers who are denied service more than one day in advance of the service day call back and eventually reserve their requested trip.
3. Metro appears to have no policy for missed trips.
4. Based upon a review of Call-A-Ride data reports for February 9, 2005, it appears that Metro does not record missed trips as a category for performance monitoring purposes. Missed trips appear to be grouped with customer no-shows and late cancellations.
5. Analysis of data for the sample day indicated that for 10 trips (0.6 percent of the 1,752 ADA trips dispatched on the service day) that were not completed; the vehicle arrived at the pickup address more than 15 minutes after the scheduled time. For 47 trips (2.7 percent) that were not completed, there was no vehicle arrival time. All of these trips could be missed trips—resulting in as many as 57 (3.3 percent) missed trips. Some of these trips could also be late cancellations.
6. Metro has two standards for on-time performance. For the customer, the standard for on-time is a vehicle arrival between 15 minutes before and 15 minutes after (-15/+15) the scheduled time. For performance measurement and reporting the standard is 15 minutes before and 20 minutes after (-15/+20) the scheduled time. Use of one standard for the customer and a more generous standard for performance measurement overstates the level of service being provided to the customer.
7. Based on an on-time window of 15 minutes before to 15 minutes after (-15/+15), 93.7 percent of customers were picked up either early or on-time, and 6.3 percent of customers were picked up late on the sample day. Of the late trips, 19 (1.2 percent of completed trips) were more than 15 minutes late and, of those, 3 (0.2 percent) were more than 30 minutes late.

Based on this sample there do not appear to be a significant number of substantially late pickups.

8. On the sample day, there were 260 passengers (15.9 percent of completed trips) picked up early. Of that number, 28 (1.7 percent of completed trips) were picked up more than 16 minutes early; of those trips, 10 (0.6 percent of completed trips) were picked up more than 30 minutes early. Very early pickups could indicate that customers are being pressured to accept early departures.
9. Of 739 trips with scheduled drop-off or appointment times, 617 (83.5 percent) were early or on-time and 122 (16.5 percent) were late. Of these late drop-offs, 34 (4.6 percent) were more than 15 minutes late; of this number, 18 (2.4 percent) were more than 30 minutes late. These late drop-offs, potentially resulting in late arrivals for work, school, or medical appointments, could be considered a constraint to use of the service by paratransit eligible individuals.
10. From a sample of 26 long trips on February 9, 2005, 14 (0.9 percent of the completed trips) exceeded Metro's standard of 90 minutes for intra-zonal trips. 15 (0.9 percent) of the 29 long trips sampled were more than 30 minutes longer than a comparable fixed route trip and 7 (0.4 percent) were more than 46 minutes longer. Five of the trips that were more than 30 minutes longer than a comparable fixed route trip were to or from the same location. This appears to be a pattern of significantly long trips.

## Recommendations

1. Metro should adopt a policy goal of zero denials for all trip requests regardless of how far in advance they are made before the close of business on the day before service.
2. Metro should review its procedure for measuring trip denials to assure that it is identifying and counting all denials in its performance measurement and reporting.
3. Metro should adopt a performance standard for missed trips.
4. Metro should modify its procedures for performance measurement to include identification and measurement of missed trips.
5. Metro should monitor missed trips and take action as necessary to minimize the number of missed trips such that there are not a substantial number of missed trips.
6. Metro should use the on-time performance window that it communicates to customers as the standard for measuring and reporting on-time performance.
7. Metro should monitor the number and time of early pickups to assure that customers are not being pressured to accept trips before the agreed upon pickup window.
8. Metro should monitor late drop-offs and take action to minimize the number and extent of late drop-offs in order to assure that availability of service is not limited by untimely service.
9. Metro should monitor trip duration to identify significantly long trips and take corrective actions as necessary, such as limiting the size of large groups traveling together on one vehicle.

## B. Transportation Operations

### Dispatching

Metro performs all dispatching for Call-A-Ride services at its operations center at 3300 Spruce Street, where all other Call-A-Ride operations activities take place. The Call-A-Ride dispatchers oversee vehicles for demand-responsive service as well as other Call-A-Ride service, such as the Chesterfield Connector, though they devote most of their attention to the demand-responsive services. At all times, there is a lead dispatcher. At peak times, Call-A-Ride has a total of three dispatchers. Other times, Call-A-Ride may have either one or two dispatchers.

When there are two or three dispatchers working, there is no explicit allocation of work among the dispatchers, i.e., no particular runs or geographic areas assigned to each dispatcher. Overall, they are looking at whether vehicles are running on or ahead of schedule. Each vehicle is equipped with both a two-way radio and a mobile data terminal (MDT) which is used to provide drivers with schedule information, track performance, and communicate between drivers and dispatchers. The dispatchers noted that most drivers are diligent in entering or “performing” their pickups and drop-offs on MDTs. Drivers are continually updating their schedule manifests via MDTs, so the dispatchers can see updated estimated times of arrival (ETAs) on the PASS dispatch screens. Drivers use both the MDTs and radios to communicate with the dispatchers. The MDTs can transmit limited messages. As a result, drivers often respond via radio to dispatcher questions (e.g., location, time to next pickup or drop-off) sent over the MDT.

While Call-A-Ride has about 95 vehicle runs or routes on weekdays, during the morning and afternoon peaks, there may be 60 vehicles on the road. Based on the number of vehicles out during the peak, it appears that Metro has sufficient dispatcher coverage for Call-A-Ride operations.

Metro maintenance staff makes the actual assignment of vehicles to run each day. They account for the availability of vehicles due to repairs or other maintenance issues. To some extent, they also try to balance the mileages of vehicles. Metro does not regularly assign the same vehicle to a driver.

The dispatchers perform the typical activities of a paratransit operation. They take customer calls on ride status (“Where’s My Ride?”) and contact drivers to obtain the ETA. When a driver radios that he or she cannot locate a rider, a dispatcher tries to call the rider. Call-A-Ride has home telephone numbers for most riders, plus some cell phone numbers. They have a limited set of telephone numbers for trip destinations. A dispatcher must approve a driver’s request for a passenger no-show. Even so, Metro has a “no strand” policy for riders with return trips. If a rider calls after the vehicle has left, Metro will not record this as a passenger no-show, but will re-classify the trip as a will-call for later pickup. This practice, if not done properly, can result in misclassification of trips. If the customer is not ready for the pickup the trip should be classified as either a no-show or a “no fault” no-show. A no fault no-show would occur due to circumstances beyond the customer’s control—such as medical status. Metro should then schedule a new will-call trip for the customer. Failure to schedule a new trip can result in a trip record that would appear to be a late pickup or a missed trip.

On weekdays, Call-A-Ride has five clean-up runs that start in the early morning and extend to early afternoon. These clean-up runs have assigned drivers and vehicles but no pre-assigned passenger trips. There are an additional five clean-up runs that start in early afternoon and continue to the end of the service day. Table IX.12 lists the Call-A-Ride clean-up runs.

**Table IX.12 – Call-A-Ride “Clean-Up” Runs**

Run Number	Start Time	End Time
Morning Runs		
601	5:15 a.m.	11:00 a.m.
603	5:15 a.m.	1:45 p.m.
605	4:15 a.m.	1:45 p.m.
607	3:30 a.m.	2:00 p.m.
609	5:15 a.m.	1:45 p.m.
Evening Runs		
602	11:00 a.m.	7:30 p.m.
604	1:45 p.m.	10:15 p.m.
606	1:45 p.m.	11:15 p.m.
608	2:00 p.m.	12:30 a.m.
610	1:45 p.m.	10:15 p.m.

The vehicles for these runs are stationed in the various Call-A-Ride service zones. The lead morning and afternoon dispatchers prefer to have one each in the south, west, north, and city zones, with one at the operations center. They are used to cover trips of vehicles that are running late or have a road call. The clean-up runs also handle will-call trips. In addition, Call-A-Ride has spare or extra-board drivers assigned for every shift that may also serve as clean-up drivers. Dispatchers are conscious of pickup times and try to maintain a high on-time performance for pickups.

Both the morning and afternoon lead dispatchers appreciate the flexibility that the clean-up runs provide them. They sometimes have to reduce the number of clean-up runs to cover for an otherwise uncovered run (e.g., usually for a driver absence). They do not want to eliminate the clean-up runs completely, even if that means having to close a scheduled run and re-assign all of its trips to other runs (which they said occurs several times per month). If needed, they can keep drivers on the road beyond their scheduled shift times. The dispatchers did not favor reducing the clean-up runs to create runs that have trips assigned to them—which could create additional capacity for the denied trips.

Over the course of a weekday, Call-A-Ride may have 20 or more trips on its “Route 0,” the will-call route. These trips are medical will-calls, the rescheduled trips of no-shows, and an occasional same-day trip request (not officially allowed by Metro policy). Dispatchers are always looking for available time on the existing runs to insert these trips. Many of the open slots arise from late cancellations and no-shows. When asked if the denied trips could be placed on Route 0 for same-day scheduling, the dispatchers indicated that this was a potential solution. However, its full effectiveness would depend on the number of denials that would be added to Route 0.

The dispatchers closely monitor passenger trips that require transfers: both transfers between Metro fixed route vehicles and transfers between Metro and ATS or ACT paratransit services in Illinois. If the destination is within two miles of the Metro service area (or Metro service zone), then Metro will provide a direct trip and avoid a transfer. When a passenger trip requires a transfer, Call-A-Ride schedules the drop-off or pickup time for its vehicles without necessarily ensuring that the rider has a direct vehicle-to-vehicle transfer.

The lead afternoon dispatcher also has several other tasks that he works on as the afternoon peak service demands diminish. He prepares the “paddles” (printed route manifests, clip boards, vehicle assignments, and keys) for the next morning’s shifts.

## Driver Operations

The review team interviewed 11 Call-A-Ride drivers over two days at the Metro Call-A-Ride facility to get a sense of whether drivers have adequate resources, training, and understanding of procedures to provide effective service with respect to ADA complementary paratransit performance criteria. Information gained from the interviews can be helpful in identifying driver issues that could affect service performance. The overall results of the interviews are summarized as follows:

- Drivers consistently understand Metro procedures, including the definition of the pickup window and no-show procedures.
- Drivers believe the training is good.
- Drivers report vehicle maintenance and repair to be excellent.
- Dispatch provides support for late trips, often intervening before the driver identifies a problem.

Responses to specific elements of the interview are further described below:

**Training.** The drivers have up to five weeks of training: two weeks in class and three weeks on the road with an instructor. They receive ADA training and sensitivity training, which includes having customers with various disabilities come in to talk to the drivers. Some of the drivers noted that this was very informative.

**Vehicles.** All drivers indicated that the vans were well maintained. In-service breakdowns are rare: less than one breakdown per driver per year. Maintenance is very responsive with both fixing small things noted on the daily inspection sheet and dispatching a tow truck and spare vehicle if a passenger is on a disabled van.

**Schedule.** Drivers indicated that sometimes the sequence of pickups does not make sense or provide enough time between trips. Some drivers indicated that schedules have become harder to maintain in the past month because there is less slack time built into the schedule. Drivers are expected to find their own way between pickups by using the map book. More experienced drivers are able to get around better than newer drivers, as would be expected.

**Operating Procedures.** Every driver knew the definition of the 15-minute early and late (-15/+15) on-time pickup window. They also understood the procedure to follow for a customer no-show. Drivers noted that if they are running late, dispatch often reacts proactively and will modify their route schedule. Dispatch is monitoring their on-time performance through the MDTs.

**Other comments.** Overall, the drivers like their job and they hate being late.

## Findings

1. Dispatchers appear to monitor and control service so as to avoid missed trips and maintain a high level of on-time performance.
2. Dispatchers appear to have effective procedures in place to minimize customer no-shows. Dispatchers attempt to contact passengers if drivers are unable to find them at the pickup location.
3. Metro has a “no strand” policy for riders with return trips. If a rider calls after the vehicle has left, Metro will not record this as a passenger no-show, but will re-classify the trip as a will-call for later pickup.
4. Metro appears to have the capacity to accommodate some trips that could not be scheduled before the service day by assigning those trips to “Route 0,” as well as using capacity made available from cancellations and available on the “clean up” runs. This capacity could be used to reduce or eliminate trip denials.
5. Call-A-Ride appears to have sufficient dispatch coverage to effectively monitor and control service.
6. Drivers appear to be well trained and have the resources including vehicles and dispatch support to perform their job.
7. Drivers cited illogical routing and tight schedules as a concern.

## Recommendations

1. Dispatchers should modify their “no strand” policy by classifying the return trip missed by the customer as either a regular or no-fault no-show and initiate a new “will-call” trip for the customer. This will assure that the trips are not misclassified as operator missed trips or very late pickups.
2. Metro should assign trips which are currently denied to the “0” run, which dispatchers can then schedule to capacity that becomes available by cancellations or no-shows. Metro should implement this practice in increments to avoid significant adverse impacts on missed or late trips. For example, initially 10 unscheduled trips could be scheduled to the “0” run at the beginning of the service day with the number increased by 10 per day depending on capacity to effectively serve these trips. If service is adversely impacted, Metro should increase capacity by adding runs until all denials are eliminated, while maintaining acceptable service performance.



3. Metro should continue to monitor and refine schedules through scheduling parameters, proofing, and dispatching to minimize illogical routing and schedules that are too tight.

## X. Resources

As part of this review, team members collected and analyzed information about the adequacy of resources available to provide the ADA complementary paratransit service as required by the DOT ADA regulations. The purpose of this analysis was to identify the potential of resource limits to constrain service for ADA eligible customers. The review included:

- Input from consumers.
- Review of adequacy of equipment, particularly the vehicle fleet and the availability of vehicles to cover scheduled routes.
- Review of staffing, including availability of drivers to cover scheduled routes.
- The operating budget for the service and the process used to estimate funding needs.

Following is a summary of observations in each of these areas.

### Consumer Input

Input collected from the perspective of consumers to assist the reviewers in identifying compliance issues of concern is summarized in Section III of this report. Input was collected from review of complaints on file with FTA, consumer interviews, and review of customer complaints on file with Metro. Of the issues raised, three potentially relate to overall service capacity:

- **Delay in the eligibility process:** A more expedient eligibility process could result in some increase in trip requests.
- **Telephone access:** reduced hold times could result in increased trip requests.
- **Trip denials:** elimination of denials could result in the need for additional service capacity.

### Telephone Access

As discussed in Section VII of this report, telephone access appears to limit the availability of service to ADA complementary paratransit eligible individuals. The new computer reservations system may help to relieve this problem by reducing call times. Accepting all trip requests by removing limits on the number of trip requests per call should also help to reduce call volumes and call times. Even with these changes in procedures, there may still be insufficient reservations staffing to reduce hold times to levels that do not limit customer access to service. Of 16 work stations, 14 are available to reservationists. Currently there are usually eight or fewer reservationists actively assigned to work at any one time. Accordingly, there appears to be sufficient equipment and work area capacity available at present to serve both existing and increased reservationist staff positions.

## Scheduling and Dispatch

As discussed in Section VIII of this report, scheduling staffing and equipment appear to be adequate. Computer upgrades planned at the time of the review are expected to make the reservations and scheduling process more efficient.

The dispatch staffing levels appear to be adequate to effectively address service needs.

## Transportation

Call-A-Ride managers indicated that they needed 204 drivers to cover scheduled weekday runs. An additional 29 drivers are assigned to “extra board” or backup to cover for scheduled and unscheduled driver absences or unusual service needs. Managers indicated that approximately nine extra board drivers are assigned to service on a typical day. Absenteeism averages approximately 3.5 percent. Accordingly, average daily needs for service are 213 drivers with 233 including extra board drivers. There is also an allowance for driver overtime of approximately seven percent built into schedules. The overtime reflects the efficiency of extending driver shifts for an hour or two to meet service needs rather than assigning a different driver for a whole shift. For budget purposes, Call-A-Ride is authorized 236 driver positions, which allows for some inactive drivers, or drivers who are unable to work for an extended period. As seen in Table X.1, the monthly complement of available drivers from September 2004 through February 2005 ranged from 221 to 230. The manpower roster has been sufficient to cover the schedule need of 204 plus assigned extra board, 213, with additional available extra board of 8 to 17 drivers.

**Table X.1 – Call-A-Ride Operator Availability**

Period	Authorized	Inactive*	Total	Available	Variance	Trainees**
September 2004	236	0	236	227	-9	5
October 2004	236	1	237	222	-14	14
November 2004	236	1	237	230	-6	13
December 2004	236	0	236	223	-13	7
January 2005	236	1	237	221	-15	15
February 2005	236	2	238	223	-13	13

\*Inactive Operators defined as those unable to work for 90 days or more in regularly assigned position/facility due to absence.

\*\*Trainee count not included in total counts for assigned numbers.

Driver recruitment is done by the Metro Human Resources Department. Recruitment includes a test to assess the applicant’s suitability to work as a Call-A-Ride driver and a personal interview with Call-A-Ride Managers. Upon completion of testing and interviews, drivers enter a training program. The attrition rate during training is approximately 20 percent. Metro requires each Call-A-Ride driver to have a chauffeur’s license.

Metro data on driver tenure was reviewed in order to assess Metro’s ability to maintain a sufficient number of drivers. As indicated in Table X.2, as of April 12, 2005, 173 or 75 percent

of Call-A-Ride drivers had been driving for more than one year, with 54 (23 percent) driving for more than five years. In addition, 10 recently hired drivers were in training.

**Table X.2 – Driver Tenure as of April 12, 2005**

Tenure	# of Drivers	% of Drivers
0-3 Months	17	8%
3-6 Months	10	4%
6-12 Months	30	13%
1-2 Years	44	19%
2-5 Years	75	33%
More than 5 Years	54	23%
Total	230	100%

The review team also assessed recent driver terminations. As noted in Table X.3, 58 drivers were separated from Call-A-Ride service between July 1, 2004 and March 31, 2005. These drivers averaged 820 days (2.2 years) of employment. Approximately two-thirds of the drivers were terminated or failed to complete probation. Approximately one-third resigned. Drivers who transferred to Metro buses had been driving for Call-A-Ride for at least four years. Most drivers who left Call-A-Ride for non-Metro jobs had been working for Call-A-Ride for less than 6 months. According to Metro Managers, some drivers are attracted to positions as bus operators by higher hourly rates and better benefits.

**Table X.3 – Driver Separations, July 1, 2004 - March 31, 2005**

	Number	%
Number of Drivers	58	
Average Years Employed	2.2	
Terminated	39	67.2%
Resigned	19	32.8%

In summary, driver staffing appears to be adequate and not be a limit to service.

The Metro van fleet appears to be adequate to accommodate current demand for service. The 120 vehicle fleet appears sufficient to serve Call-A-Ride’s 95 runs plus the Chesterfield service with adequate provision of spare vehicles.

## Planning, Budgeting, and Funding

A reviewer met with Metro officials to review the process for developing and adopting the annual budget for Metro’s ADA complementary paratransit services.

Metro’s fiscal year is July 1 to June 30. The budget process begins in November with development of initial manpower requirements for each department. The manpower requirements for Call-A-Ride service are based upon a service plan which includes the number of planned runs. The planned runs are developed around four schedules, or operator assignment “picks” for the year. Each department estimates need for by major department functions such as

Call Center and drivers for Call-A-Ride. This forms the basis for estimating the expected costs for the department. This process, initiated in November, results in a preliminary budget. The budget is reviewed against the previous year's costs, current year-to-date costs, and projected costs for the next year, and targeted departmental cost reductions. In January, costs are reviewed by senior staff against budget targets; reductions that do not reduce service are made. The revised budgets are reviewed by all departments in March, further revised, and submitted to the Metro Board of Directors in April.

A review of Monthly Call-A-Ride status reports indicates that operating capacity has been insufficient to serve expressed demand (trips served plus capacity denials) in recent years. As indicated in Table IX.4, it appears that Metro has made positive strides in addressing this capacity shortfall by increasing the percentage of demand served from 93.8 percent in FY2003 to a projected 99.1 percent in FY2005.

**Table X.4 – Call-A-Ride Passenger Demand**

<b>Year</b>	<b>FY2002</b>	<b>FY2003</b>	<b>FY2004</b>	<b>FY2005</b>
<b>Passenger Trips</b>	523,418	575,344	682,097	779,740
<b>Capacity Denials</b>	25,723	37,762	11,914	7,196
<b>Expressed Demand</b>	549,141	613,106	694,011	786,936
<b>% of Demand Served</b>	<b>95.3%</b>	<b>93.8%</b>	<b>98.3%</b>	<b>99.1%</b>

Call-A-Ride budget increases appear to have provided for expansion of service capacity, as can be seen in Table IX.5. Both demand for service and operating budgets have increased significantly in recent years.

**Table X.5 – Ridership and Budget Trends**

<b>Year</b>	<b>FY2002</b>	<b>FY2003</b>	<b>FY2004</b>	<b>FY2005</b>
<b>Passenger Trips</b>	523,418	575,344	682,097	779,740*
% Change		9.9%	18.6%	14.3%
<b>Expressed Demand</b>	549,141	613,106	694,011	786,936*
% Change		11.6%	13.2%	13.4%
<b>Operating Budget</b>	\$13,387,640	\$15,037,803	\$16,529,334	\$17,738,810
% Change		12.3%	9.9%	7.3%

\* Projected based on actual boardings for the period July 1 through December 31, 2004

According to Metro managers, influences on demand, capacity, and budget have included:

- An independent operator went bankrupt in 2004, leading to an increase in demand for Call-A-Ride service. Much of the demand increase was for group travel during off-peak service hours, resulting in increased productivity.
- Managers anticipate an offset of demand increases in 2005 from a reduction in service hours to fixed route service hours.
- A fleet increase from 63 passenger vehicles in 2000 to a current fleet of 120 passenger vehicles has helped increase service capacity.

## Findings

1. Staffing of the Call-A-Ride call center appears to limit access by customers to reserve trips. New reservations software and procedural changes to reduce call volume should increase efficiency of the reservations process, but additional staffing will likely be required to reduce hold times to a level that does not significantly impeded access to service.
2. Equipment and staffing of scheduling, dispatch, and transportation service appear to be adequate to provide effective service at current levels of demand.
3. Increased demand for service may require an increase in the number of runs and associated increases in the number of drivers and vehicles.
4. Budget increases in recent years appear to be responsive to the need to serve unserved demand for service (trip denials).

## Recommendations

1. Hold times for incoming calls for reservations at the Call-A-Ride call center should be closely monitored and staffing increased as needed to reduce hold times to a level that does not impede access to service.
2. The number of denials should be closely monitored and operating capacity should be increased as needed to eliminate denials without significant adverse impact on other service performance measures.
3. Budget increases should continue as needed to finance the service capacity to eliminate denials without significant adverse impact on other service performance measures.

**Attachment A**

**St. Louis Metro Response**







October 11, 2006

*Transmitted electronically & via First Class Mail*

Mr. Michael A. Winter  
Director, Office of Civil Rights  
Federal Transit Administration  
400 Seventh Street, S.W.  
Washington, DC 20590

Dear Mr. Winter:

Thank you for your ongoing support of Metro as we continue to move towards full ADA compliance. We appreciate the opportunity to respond to the draft findings of the ADA Review that was conducted in April 2005, by Planner's Collaborative, Inc.

Enclosed are Metro's comments as well as requests for reconsideration of findings that we believe to be in error. I was responsible for the preparation of the responses, with input from other key staff members. I will be the contact person for Metro for all ADA findings. You can reach me at (314) 982-1525 or by email: [phall@metrostlouis.org](mailto:phall@metrostlouis.org).

Metro remains strongly committed to achieving and maintaining ADA compliance. We will implement any changes necessary to address the findings contained in the final report associated with the April 2005 ADA review. I look forward to receiving the final report and the continued support of the FTA.

Sincerely,

Patricia P. Hall

Enclosure

CC w/ enclosure:

Larry E. Salci	David Knight, FTA
Thomas Sehr	Thomas Harris, FTA
Raymond Friem	Mokhtee Ahmad, FTA
Janis Shetley	



**Metro**

**Response to Draft Findings of ADA  
Paratransit Compliance Review  
Conducted April, 2005**

Submitted by

Metro  
707 N. First Street  
St. Louis, MO 63102

October 13, 2006

# Summary of Findings from FTA Draft Report

## A. ADA Complementary Service Criteria

1. The Metro ADA complementary paratransit service area includes all locations in St. Louis City and St. Louis County, within 3/4-miles of all Metro fixed route services.
2. Metro does not provide Call-A-Ride Plus service-to-service areas within 3/4-miles of Metro Link Stations that it serves in Illinois.
3. Metro and ATS effectively coordinate interregional service for ADA complementary paratransit eligible customers. It is a seamless process for riders, including reservation and fare payment.
4. Metro Call-A-Ride Plus service schedule does not include service for all days and hours of scheduled service for several Metro Bus routes.
5. For trips of two or three zones, it appears that the Call-A-Ride Plus fare of \$3.50 can be more than two times the fare of a comparable fixed route trip on Metro by a typical user, if that user is traveling without a transfer on Metro Link one of the many Metro Bus routes that serve multiple Call-A-Ride zones.
6. The transfer charge for Call-A-Ride Plus trips that include transfers to fixed route service can further increase the difference between Call-A-Ride Plus fares and fixed route fares for trips with the same trip origin and destination.

## B. ADA Complementary Paratransit Eligibility

1. Metro's policy is to make determinations of ADA complementary paratransit eligibility based on whether the applicant's mobility aid meets the definition of a "common wheelchair." This determination fails to make the distinction between the eligibility of the applicant and the applicant's mobility aid. The determination of eligibility should be made solely based on the applicant's ability to use fixed route service as addressed in 49 CFR §37.123, and not on the mobility aid that the applicant uses. The decision to limit service to mobility aids that meet the definition of a common wheelchair should be addressed by Metro as a separate issue from eligibility.
2. Based on review of a sample of 34 applications for Metro's Call-A-Ride service submitted during 2004 and 2005, the determinations made by Metro seem reasonable. Other than the policy regarding common wheelchairs, Metro's eligibility determination process does not appear to deny or restrict ADA complementary paratransit service to eligible individuals.
3. Approximately 25 percent of applicants receive conditional eligibility. At the time of the on-site review Metro provided service to individuals who have conditional eligibility as if they had unconditional eligibility. As a result, any rider with conditional eligibility could be scheduled for any trip requested.
4. Metro has defined its eligibility process such that the application is complete after the in-person assessment. Based on this standard, Metro made determinations within 21 days for only 4 of the 12 applications in the review team's sample of applications filed between

March and December of 2004. Four applications took at least 90 days and two applications took up to 170 days. In a February 2005 sample, Metro greatly improved the timeliness of its application processing, making determinations for 20 of 22 completed applications within 21 days.

5. The time from submittal of a written application and an in-person interview is significant and could be an impediment to ADA complementary paratransit eligible individuals obtaining access to service. The average number of days in the 2004 sample was 63 days between receipt of written application and the in-person assessment. This decreased to 33 days in the 2005 sample. Metro did not have any documentation to identify the reason for the extended period between application submission and in-person assessment.
6. The DOT ADA regulations (49 CFR §37.125 (c)) requires that applicants be treated as eligible for service if a determination of eligibility has not been made within 21 days following the submission of a complete application. The application and other public information provided by Metro do not inform applicants of their right to service if they have not received a determination on their completed application within 21 days.
7. Metro has a process in place for appealing eligibility determinations. However, as of the time of the review team's site visit, there had not been a formal appeal for more than three years. As a result it was not possible to review determinations made on requests for appeal.
8. In its letter to applicants who are determined ineligible for ADA complementary paratransit service, Metro does not provide specific reasons for why the applicant is determined ineligible for service. Absence of such information could impede applicant's decision on whether or not to appeal the determination.
9. In its letter to applicants who receive temporary eligibility for ADA complementary paratransit service and in its letter to applicants who are denied eligibility for ADA complementary paratransit service because the mobility aid that they use, Metro does not refer to or include information on its appeals process. As a result, applicants who are determined ineligible may not be aware of their right to appeal the decision.
10. Metro's appeals process description states, "Appeals must be made in writing" and "The written appeal should state the reason or reasons you believe the determination to be incorrect." To require the appeal be made in writing and state the reason for the appeal could deprive the appellant of an opportunity to be heard and present information and arguments that the appellant would otherwise have if the appeal were made orally and without advance written reasons.
11. Metro's Director of ADA services handles request for appeals on an informal basis. The Director of ADA services has the formal responsibility for approving all initial eligibility determinations. This practice is at variance with the requirements of the DOT ADA regulations that decisions on appeals be made by a person not involved in the initial decision to deny eligibility, or "separation of functions."
12. Metro has a policy to suspend Call-A-Ride service to riders who exceed a threshold of no-shows or late cancellations. Under the current policy, a person traveling five days a week (10 one-way trips a week) could be suspended for having no-shows for only 3.5 percent of his/her scheduled trips. This rate of no-shows does not appear to constitute a "pattern or practice" as intended by the regulations.

13. Metro considers same day cancellations in its procedure for service suspensions. The DOT ADA regulations allow transit systems to suspend service for a reasonable period for riders who abuse the system by regularly “no-showing” for scheduled trips. While transit agencies have in recent years also considered “late cancellations” to be an abuse of the system and have considered this in their suspension policies, the effects of a late cancellation should be operationally equivalent to a no-show in terms of the negative impact on the service. Cancellations made several hours in advance of the scheduled pick-up time would still seem to allow the system’s dispatchers to use the open vehicle time to respond to same-day operating issues. Accordingly, same day customer cancellations made several hours before the scheduled time should not be considered as a basis for suspending customer service.
14. Metro’s ID card for ADA complementary paratransit service includes condition codes for individuals who are conditionally eligible. However, the card does not provide an explanation for these codes.

### **C. Telephone Access**

1. Metro’s policy goal of average times in queue of 4.18 minutes likely results in many calls in queue for periods of time well in excess of 4.18 minutes and would appear to significantly limit ADA complementary paratransit customers’ ability to use Call-A-Ride service.
2. During the week of February 7 to 11, 2005, Metro received a total of 4,053 calls to the reservation center. Daily average hold times for the four phone lines ranged from 0.65 minutes to 2.45 minutes. Of the 4,053 calls, 737 were abandoned by the caller for an abandonment rate of 18 percent. This high abandonment rate is an indicator of difficulty in getting through on the phone lines to make reservations. Call Center staffing and equipment limits may be contributing to long hold times and high abandonment rates.
3. The review team observed 76 calls during the two-day period of April 12 and 13, 2005. These calls averaged over seven minutes to complete. The reservations system being used at the time of the review appeared to be antiquated and slow, contributing to the long call times. Metro was in the process of upgrading its computer reservations system with a scheduled implementation during the summer of 2005.
4. Metro’s advertised Call-A-Ride reservations hours are 7:30 a.m. to 4:30 p.m. During the review, the Reservations Center closed at 4:21 p.m., based on a wall clock that was nine minutes fast.
5. Any calls left in the queue at the end of the day were abandoned. As a result, some customers calling before 4:30 p.m. are not being served.
6. Metro accepts only four one-way trip requests per call during peak call times. This policy can increase the length of telephone queues by requiring reservationists to handle multiple calls rather than one to serve one customer and placing multiple calls rather than one in the phone queue.
7. Metro tracks performance by measuring the callers’ average time in the telephone queue. This performance measure does not capture the number of callers that have significantly long hold times, which provides a better index of customer service and telephone access.

8. It is Metro's practice for reservation clerks to rotate into the dispatch center and handle customer assistance calls. This appears to be very beneficial because it allows the reservation clerk to understand additional aspects of the reservation process and gives the clerk a greater sensitivity to the customer's needs.

## **D. Trip Reservations and Scheduling**

1. Metro's web site and the Metro Call-A-Ride brochure dated June 28, 2004, advise Call-A-Ride customers to "phone at least 24 hours in advance to schedule your trips." The DOT ADA regulations (49 CFR §37.131(b)) requires the transit entity (Metro) to schedule and provide trips in response to a request for service made the previous day.
2. At the time of the review team's on-site visit, Metro regularly denied trip requests for ADA complementary paratransit service due to capacity constraints. The proportion of denials was generally two percent of total demand on weekdays. Of these denials approximately 20 percent were for next day service requests and 80 percent were for service requests two or more days in advance of the service day. Metro managers said that many of the riders who have their trip requests denied call back on a subsequent day and get a trip. However, Metro has not tried to document this number, and it is not without significant effort on the part of the rider.
3. Many trips denied early in the scheduling period can be scheduled later in the scheduling period as a result of trip cancellations and/or route modifications made by proofers. Denial of such trip requests precludes them being served unless the customer calls again at a later time to request the trip.
4. The Metro scheduling software does not include a function to schedule trips to meet appointment times. Reservationists record appointment times requested by callers in the software system and can attempt to place the trip on the run they feel is most appropriate. However, Metro has not set up PASS to schedule by appointment time.

## **E.1 Service Performance**

1. Metro's policy standard for service denials does not appear to consider all denials. Metro's policy standard is zero denials for requests made the previous day. Metro accepts service requests seven days in advance of the service day, and "Metro Call-A-Ride Easy Trips" brochure encourages customers to call early to make trip reservations. Denying a trip more than one day in advance of the service day, thereby requiring multiple calls to schedule a trip, appears to limit access to the service and constitute a capacity constraint.
2. The review team's analysis of a one-day sample indicates that 64 (2.5 percent) of trip requests for service on February 9, 2005 were denied. During the period June through December 2004 Metro reported next day denials of 0.6 percent. Metro indicated that some customers who are denied service more than one day in advance of the service day call back and eventually reserve their requested trip.
3. Metro appears to have no policy for missed trips.

4. Based upon a review of Call-A-Ride data reports for February 9, 2005, it appears that Metro does not record missed trips as a category for performance monitoring purposes. Missed trips appear to be grouped with customer no-shows and late cancellations.
5. Analysis of data for the sample day indicated that for 14 trips (0.7 percent of the 2,019 trips dispatched on the service day) that were not completed, the vehicle arrived at the pickup address more than 15 minutes after the scheduled time. For 57 trips (2.8 percent) that were not completed, there was no vehicle arrival time. All of these trips could be missed trips—resulting in as many as 71 (3.5 percent) missed trips. Some of these trips could also be late cancellations.
6. Metro has two standards for on-time performance. For the customer, the standard for on-time is a vehicle arrival between 15 minutes before and 15 minutes after (-15/+15) the scheduled time. For performance measurement and reporting the standard is 15 minutes before and 20 minutes after (-15/+20) the scheduled time. Use of one standard for the customer and a more generous standard for performance measurement overstates the level of service being provided to the customer.
7. Based on an on-time window of 15 minutes before to 15 minutes after (-15/+15), 94.2 percent of trips were picked up either early or on-time, and 5.8 percent of trips were picked up late on the sample day. Of the late trips, 20 (1 percent of completed trips) were more than 15 minutes late and, of those, 4 (0.2 percent) were more than 30 minutes late. Based on this sample there do not appear to be a significant number of substantially late pickups.
8. On the sample day, there were 306 (16.1 percent of completed trips) picked up early. Of that number, 35 (1.8 percent of completed trips) were picked up more than 16 minutes early; of those trips, 11 (0.6 percent of completed trips) were picked up more than 30 minutes early. Very early pickups could indicate that customers are being pressured to accept early departures.
9. Of 833 trips with scheduled drop-off or appointment times, 710 (85 percent) were early or on-time and 123 (15 percent) were late. Of these late drop-offs, 34 (4.0 percent) were more than 15 minutes late; of this number, 18 (2.1 percent) were more than 30 minutes late. These late drop-offs, potentially resulting in late arrivals for work, school, or medical appointments, could be considered a constraint to use of the service by paratransit eligible individuals.
10. From a sample of 29 long trips on February 9, 2005, 21 (1.1 percent of the completed trips) exceeded Metro's standard of 90 minutes for intra-zonal trips. 15 (0.8 percent) of the 29 long trips sampled were more than 30 minutes longer than a comparable fixed route trip and 7 (0.4 percent) were more than 46 minutes longer. Five of the trips that were more than 30 minutes longer than a comparable fixed route trip were to or from the same location. This appears to be a pattern of significantly long trips.

## **E.2 Transportation Operations**

1. Dispatchers appear to monitor and control service so as to avoid missed trips and maintain a high level of on-time performance.
2. Dispatchers appear to have effective procedures in place to minimize customer no-shows. Dispatchers attempt to contact passengers if drivers are unable to find them at the pickup location.
3. Metro has a “no strand” policy for riders with return trips. If a rider calls after the vehicle has left, Metro will not record this as a passenger no-show, but will re-classify the trip as a will-call for later pickup.
4. Metro appears to have the capacity to accommodate some trips that could not be scheduled before the service day by assigning those trips to “Route 0,” as well as using capacity made available from cancellations and available on the “clean up” runs. This capacity could be used to reduce or eliminate trip denials.
5. Call-A-Ride appears to have sufficient dispatch coverage to effectively monitor and control service.
6. Drivers appear to be well trained and have the resources including vehicles and dispatch support to perform their job.
7. Drivers cited illogical routing and tight schedules as a concern.

## **F. Resources**

1. Staffing of the Call-A-Ride call center appears to limit access by customers to reserve trips. New reservations software and procedural changes to reduce call volume should increase efficiency of the reservations process, but additional staffing will likely be required to reduce hold times to a level that does not significantly impeded access to service.
2. Equipment and staffing of scheduling, dispatch, and transportation service appear to be adequate to provide effective service at current levels of demand.
3. Increased demand for service may require an increase in the number of runs and associated increases in the number of drivers and vehicles.
4. Budget increases in recent years appear to be responsive to the need to serve unserved demand for service (trip denials).



**St. Louis Metro  
ADA Complementary Paratransit Compliance Review  
Quarterly Report – Draft Findings**

<b>Finding #</b>	<b>Corrective Action Identified</b>	<b>Planned Completion Date</b>
<b>A. Complementary Paratransit Service Criteria</b>		
<b>1</b>	No Response Required	
<b>2</b>	Amend Contract with St. Clair County Transit	12/31/06
<b>3</b>	No Response Required	
<b>4</b>	Metro will analyze current fixed route service and adjust paratransit as necessary	7/1/07
<b>5</b>	Metro will evaluate its fare policy for ADA multi-zone trips	7/1/07
<b>6</b>	Metro will include this issue in its analysis of the paratransit fare	7/1/07
<b>B. ADA Complementary Paratransit Eligibility</b>		
<b>1</b>	Reconsideration Requested	
<b>2</b>	No Response Required	
<b>3</b>	No Response Required	
<b>4</b>	No Response Required	
<b>5</b>	Redesign Database used to allow better documentation	12/31/06
<b>6</b>	Transit Access Program brochure will be revised	7/1/07
<b>7</b>	No Response Required	
<b>8</b>	General Ineligibility letter will be revised	12/31/06
<b>9</b>	Revise Temporary Eligibility Letter Only	12/31/06
<b>10</b>	Appeals process and associated written materials will be revised	12/31/06
<b>11</b>	Appeals process will be revised	12/31/06

<b>12</b>	Reconsideration Requested	
<b>13</b>	Reconsideration Requested	
<b>14</b>	Reconsideration Requested	None
<b>C. Telephone Access</b>		
<b>1</b>	No Action Planned	None
<b>2</b>	No Action Planned	None
<b>3</b>	No Action Planned	None
<b>4</b>	No Action Planned	None
<b>5</b>	New ACD System is being studied	Unknown
<b>6</b>	No Action Planned	None
<b>7</b>	New ACD System is being studied	Unknown
<b>D. Trip Reservations and Scheduling</b>		
<b>1</b>	No Action Planned	None
<b>2</b>	New software for paratransit operations & analysis of true ADA trip denials	7/1/07
<b>3</b>	New software for paratransit operations	7/1/07
<b>4</b>	No Action Planned	None
<b>E.1 Service Performance</b>		
<b>1</b>	No Action Planned	None
<b>2</b>	No Action Planned	None
<b>3</b>	No Action Planned	None
<b>4</b>	No Action Planned	None
<b>5</b>	No Action Planned	None
<b>6</b>	No Action Planned	None
<b>7</b>	No Response Required	
<b>8</b>	No Action Planned	None
<b>9</b>	No Action Planned	None

<b>10</b>	No Action Planned	None
<b>E2 Transportation Operations</b>		
<b>1</b>	No Response Required	
<b>2</b>	No Response Required	
<b>3</b>	No Action Planned	None
<b>4</b>	No Action Planned	None
<b>5</b>	No Response Required	
<b>6</b>	No Response Required	
<b>7</b>	No Action Planned	None
<b>F. Resources</b>		
<b>1</b>	No Action Planned	None
<b>2</b>	No Response Required	
<b>3</b>	Continued budgeting to meet anticipated demand	Ongoing
<b>4</b>	No Response Required	

## **Metro Draft Finding Comments and Requests for Reconsideration**

### **A. ADA Complementary Service Criteria**

***2. Metro does not provide Call-A-Ride Plus service to service areas within 3/4-miles of MetroLink Stations that it serves in Illinois.***

Metro has a contract with St. Clair County Transit County to provide fixed route services in St. Clair County, Illinois. Metro will modify the contract to specifically mention compliance with complementary paratransit requirements and require quarterly reports from Alternative Transportation System who provides ADA paratransit services in St. Clair County.

***4. Metro Call-A-Ride Plus service schedule does not include service for all days and hours of scheduled service for several Metro Bus routes.***

Metro acknowledges that there were a very small number of bus routes in selected areas that operated slightly earlier or later than the Call-A-Ride service. When the new software system for paratransit operations is implemented, we will be able to identify and correct any discrepancies. It should be noted that Metro's fixed route system changed dramatically on August 28, 2006 when the Shrewsbury I-44 branch of the MetroLink opened for revenue service. Nearly every route in Missouri has changed since the ADA paratransit review was conducted in April 2005. There is also a very strong possibility that fixed route service may be reduced significantly in FY 2007 to achieve a balanced budget.

Metro will comply with the ADA requirement to provide complementary paratransit service within ¾ mile of regular fixed route service during the hours of operation of the applicable fixed route service. Metro will analyze recent and potential fixed route changes that could occur effective July 1, 2007. Any changes needed to comply with the service area requirements would be implemented in July 2007.

***5. For Trips of two or three zones, it appears that the Call-A-Ride Plus fare of \$3.50 can be more than two times the fare of a comparable fixed route trip on Metro by a typical user, if the user is traveling without a transfer on MetroLink or one of the many MetroBus that serve multiple Call-A-Ride zones.***

Metro does not have the ability to analyze and apply ADA paratransit fares on a trip-by-trip basis and the zonal system used has been generally acceptable to the community. Metro understands that fares charged for any ADA paratransit trip are not to exceed twice the applicable full fixed route fare and will analyze alternate methods for calculating ADA paratransit fares. Fare changes require community input so it is unlikely that any fare changes will occur before July 2007.

***6. The transfer charge for Call-A-Ride for Call-A-Ride Plus trips that include transfer to fixed route service can further increase the difference between Call-A-Ride Plus fares and fixed route fares for trips with the same origin and destination.***

This is analogous to finding 5 above and will be considered as ADA paratransit fares are analyzed. It should be noted that currently very few customers transfer to bus and rail as conditional eligibility is not currently enforced. In operational practice, customers who have spent a considerable amount of time on a van traveling across zones are taken to their final destination and not required to transfer to a fixed route vehicle. Fare changes require community input so it is unlikely that any fare changes will occur before July 2007.

## **B. ADA Complementary Paratransit Eligibility**

*1. Metro's policy to make determinations of ADA complementary paratransit eligibility based on whether the applicant's mobility aid meets the definition of a "common wheelchair". This determination fails to make the distinction between the eligibility of the applicant and the applicant's mobility aid. The determination of eligibility should be based solely on the applicant's ability to use fixed route service as addressed in 49 CFR §37.123, and not on the mobility aid that the applicant uses. The decision to limit service to mobility aids that meet the definition of a common wheelchair should be addressed by Metro as a separate issue from eligibility.*

Metro disagrees strongly and requests reconsideration of this finding. ADA regulations **49 CFR §37.165(b)** requires transit providers to transport all "common wheelchairs". Mobility devices that exceed the dimensions or weight specified do not have to be transported. **49 CFR §37.123 (2) (ii)** states "An individual using a common wheelchair is eligible..." The ADA Paratransit Eligibility Manual (page 6) defines a "common wheelchair" and states "An individual would not be eligible for paratransit services under category 1 if they could not use an accessible bus because their mobility aid was too large or too heavy for the lift". On page 58, it states, "It may also be helpful to request detailed information about the type, size, and weight of wheelchairs to determine if the applicant uses a "common wheelchair"". Clearly, the use of a mobility aid and whether it is a "common wheelchair" must be considered in conferring ADA paratransit eligibility, which is to be based on the applicant's functional abilities as they relate to transit and not simply the presence of a disability. The mobility aid used is an essential element of an applicant's functional ability to use any transit service.

It is important to note that "ADA Paratransit Certification" in one jurisdiction requires that ADA paratransit services be provided to the individual when he or she travels to other jurisdictions, nationwide. If the standards regarding a common wheelchair are not considered by the certifying agency, nationwide usability of ADA paratransit services cannot be ensured. The individual's ADA paratransit eligibility cannot be properly determined without consideration of the mobility device used.

Metro will continue its current practice until otherwise directed. The requirement for a common wheelchair is currently included in the Call-A-Ride Plus section of Metro's "Public Transit Options for Customers with Disabilities" brochure and will be clarified in the next printing of the "Transit Access Program" brochure when current brochures are depleted or by June 30, 2007.

*5. The time from submittal of a written application and an in-person interview is significant and could be an impediment to ADA complementary paratransit eligible individuals obtaining access to service. The average number of days in the 2004 sample was 63 days between receipt of written application and the in person assessment. This decreased to 33 days in the 2005 sample. Metro did not have any documentation to identify the reason for the extended period of between application submission and in-person assessment.*

This issue has largely been resolved. Metro staff now conducts ADA paratransit assessments instead of the contracted staff from Washington University. Most applicants are offered an

appointment date that is approximately 2 weeks after the application submission date and eligibility decisions are generally rendered in 10 days or less following the completion of the functional assessment. Metro does recognize the need for improved documentation. Software for paratransit operations that also has features for ADA paratransit certification has been delayed. A new database is currently being developed for use until the paratransit software is fully operational. It is anticipated that this database will be operational by December 31, 2006.

***6. The ADA regulations (49 CFR §37.125 9c00 requires that applicants be treated as eligible for service if a determination of eligibility has not been made within 21 days following the submission of a complete application. The application and other public information do not inform applicants of their right to service if they have not received a determination on their completed application within 21 days.***

Metro concurs with this finding and as a matter of practice has granted “presumptive eligibility” to applicants whose eligibility decisions took more than 21 days. Applications and other public information will be revised when supplies are depleted or by June 30, 2007 to ensure that applicants are aware of their rights.

***8. In its letter to applicants who are determined ineligible for ADA complementary paratransit service, Metro does not provide specific reasons for why the applicant is determined ineligible for service. Absence of such information could impede applicant’s decision on whether or not to appeal the determination.***

Metro will revise the general letter of ineligibility with the implementation of the new ADA Services database that is currently in development. This should occur no later than December 31, 2006.

***9. In its letter to applicants who receive temporary eligibility for ADA complementary paratransit service and in its letter to applicants who are denied eligibility for ADA complementary paratransit service because the mobility Aid they use, Metro does not refer to or include information on its appeals process. As a result applicants who are determined ineligible may not be aware of their right to appeal the decision.***

Metro will revise its letter to applicants who receive temporary eligibility no later than December 31, 2006. However, the policy to transport “common wheelchairs” is not subject to the appeals process. Metro is not legally obligated to transport such devices and do not believe that our current paratransit van design can consistently and reliably handle oversized mobility devices. In daily operations, we have experienced repeated lift failures on our bus and paratransit vehicles while attempting to transport customers whose mobility aid exceed the common wheelchair standards. Metro is in the early stages of exploring other vehicle designs for bus and paratransit vehicles that may allow us to transport larger mobility devices in the future.

***10. Metro’s appeals process description states, “ Appeals process must be made in writing” and the “The written appeal should state the reasons you believe the determination to be incorrect.” To require the appeal be made in writing and state the reason the reason for the appeal could deprive the appellant of an opportunity to be heard and present information and***

***arguments that the appellant would otherwise have if the appeal were made orally and without advance written reason.***

Reconsideration of this finding is requested. Metro's appeals process description as stated above is consistent with ADA regulations and guidance provided by the FTA. According to the ADA Paratransit Manual (page 94) "Transit providers can require that appeals be requested in writing." Additionally, the policy does not "require" that reasons for appeal be provided. As noted above, the wording is "should" not "must or shall". However, Metro will add wording to the letter to say that accommodations will be made for those who are unable to independently communicate in written form. This will be completed no later than December 31, 2006.

***11. Metro's Director of ADA Services handles request for appeal on an informal basis. The Director of ADA Services has the formal responsibility for approving all initial eligibility determinations. This practice is at variance with the requirements of DOT ADA regulations that decisions on appeals be made by a person not involved in the initial decision to deny eligibility or "separation of functions."***

Metro concurs with this finding. At the time of the review, the Director of ADA Services was the technical representative / contract manager for the ADA paratransit eligibility determination services that were conducted by Washington University. In June 2006, Metro hired staff to conduct ADA paratransit eligibility assessments. The Director of ADA Services no longer involved in initial decision. She will now serve as the initial reviewer for any appeals. A detailed description of the revised appeals process will be provided to the FTA with Metro's first quarterly report on the final findings of the ADA Paratransit Compliance Review.

***12. Metro has a policy to suspend Call-A-Ride service to riders who exceed a threshold of no shows or late cancellations. Under the current policy, a person traveling five days a week (10 one-way trips a week) could be suspended for having no-shows for only 3.5 percent of his/her scheduled trips. This rate of no-shows does not appear to constitute a "pattern or practice" as intended by the regulations.***

This is a statement of what "could" happen as opposed to what "actually" happens in daily operational practice. .

In FY06 Call-A-Ride provided 668,000 trips to 12,680 unduplicated customers and 4,090 of these customers are ADA paratransit eligible. We also had 143,000 cancellations and no-shows. That represents 17.2% of all requested trips that were scheduled and then cancelled or no-showed. Over 65% of all cancellations occur the night before or on the day of service so no other customers can be scheduled into those slots. It is a waste of scarce community resources and our Cancellation and No-Show Policy helps to keep this problem under control.

However, the policy is very lenient and it is applied in a very lenient manner. It takes 24 same-day cancellations in a 60-day period to get suspended. If you rode every single day for 60 days you would have to cancel 40% of your rides on the day of service before you were suspended. That is indeed a pattern. If you rode only on weekdays (as in the Review Team's explanation) there are 44 average weekdays in a 60-day period. If you cancelled 12 days worth of trips on the



day of service, that would be a 27% same-day cancel rate. Again, that is a considerable negative pattern.

A No-Show is when a customer does not even bother to call and cancel. We may spend upwards of 30 minutes looking for a customer before we leave – especially if we took the customer on the go trip. It is a huge delay for other customers on the van and we get many complaints from other customers about no-shows on the part of these customers.

It takes 3 No-Shows in a 60-day period to get suspended. There really are few excuses for not calling. If a customer does have a valid reason why they could not call (being in the hospital, out of town and so forth), the no-show is excused.

Here is what the actual operational data really looks like.

<b>FY2006 No-Shows and Cancellations - Disposition</b>							
<b>NS TYPE</b>	<b>Total Trips</b>	<b>% of Total</b>		<b>Trips with Points Charged</b>	<b>% charged</b>	<b>Trips with NO Points</b>	<b>% forgiven</b>
CNS - Client NoShow	10,094	17%		8,491	84%	1,603	16%
LAT - Same Day Cancel	31,737	52%		28,334	89%	3,403	11%
NNS - No Fault NoShow	18,378	30%					
SNS - System NoShow	783	1%					
<b>60,992</b>		<b>100%</b>		<b>36,825</b>		<b>5,006</b>	

NoFault no-shows have already been forgiven by the dispatcher or CSR that handled the disposition so the customer would not be charged any points. As shown, almost two thirds of the no-shows are forgiven at the time of the no-show by the dispatcher on duty by marking it a no-fault no-show. Forgiven no-shows are marked as such when a customer calls in to discuss their letter with the CSR – it means the no-show was reversed or forgiven with no points.

*As shown, 57% of all Late Cancels and No-Shows were “forgiven”.* The staff is very understanding and applies the policy in a very lenient manner.

As for suspensions, there were 520 client suspensions in FY2006 generated from these 60,992 late cancels and no-shows. Those 520 client suspensions were imposed on 411 unduplicated customers and 167 of these customers are ADA paratransit eligible. Most customers never get caught up in the suspension policy. Those that do get suspended have established a clear pattern of late cancellations and no shows.

As shown, the policy is absolutely necessary. Even though a cancellation/no-show rate of 17.2% is poor, it would be much worse without the policy. The policy is applied in an extremely lenient fashion with only 3% of all customers have actually been suspended from the service.

***13. Metro considers same day cancellations in its procedure for service suspensions. The DOT ADA regulations allow transit systems to suspend service for a reasonable period for riders who abuse the system by regularly “no-showing” for scheduled trips. While transit agencies have in recent years also considered “late cancellations” to be an abuse of the system and have considered this in their suspension policies, the effects of a late cancellation should be operationally equivalent to a no-show in terms of the negative impact on the service. Cancellations made several hours in advance of the scheduled pick-up time would still seem to allow the system’s dispatchers to use the open vehicle time to respond to same-day operating issues. Accordingly, same day customer cancellations made several hours before the scheduled time should not be considered as a basis for suspending customer service.***

We disagree and request reconsideration of this finding. Same day cancellations are a waste of scarce community resources and are very costly. Same day cancellations have a very negative impact on service capacity for other customers. They deprive other users of trips on the system. Metro is still trying to fund enough service to reach a zero-denial capacity level.

Additionally, it takes 24 same-day cancels in a 60-day period to get suspended from the service. We understand that things do come up occasionally and it may be necessary to cancel on the day of service from time to time. But if a customer is canceling 40% of all rides on the day of service, that has a considerable negative impact on the system for other users.

***14. Metro’s ID card for ADA complementary paratransit service includes condition codes for individuals who are conditionally eligible. However, the card does not provide an explanation for those codes.***

Reconsideration of this finding is requested. Metro’s documentation of eligibility is in compliance with DOT ADA regulations. 49 CFR §37.125 (e) states that “documentation shall 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.” The full documentation of eligibility is contained in the eligibility notification letter and the identification cards are supplemental.

The ADA Paratransit Eligibility manual (page 92) states, “Documentation can be provided in the form of an identification card, as part of a notification letter, on standard paper, or in other forms as long as the information required is included. It is also possible to provide detailed documentation in a letter or on standard paper and to supplement this with an I.D. card that contains more cryptic information.”

## C. Telephone Access

1. Metro's policy goal of average times in queue of 4.18 minutes likely results in many calls in queue for periods of time well in excess of 4.18 minutes and would appear to significantly limit ADA complementary paratransit customers' ability to use Call-A-Ride service.

As stated by the Review Team, our minimum standard for average wait times in the queue was 4.18 minutes. For a public agency, this is a reasonable response time. Our actual performance during the review, however, was actually much better than this as noted by the Review Team. As shown in their table on page 37, average wait times were excellent and well under two minutes as shown below.

Date	Day	Period		Average Hold Time (minutes)			
<i>Reservations Line #</i>				<i>#4230</i>	<i>#4240</i>	<i>#4250</i>	<i>#4260</i>
2/7/2005	Monday	7:30 AM	4:30 PM	0.97	0.82	1.32	0.90
2/8/2005	Tuesday	7:30	4:30	1.63	1.52	2.45	1.75
2/9/2005	Wednesday	7:30	4:30	0.70	0.67	1.10	0.65
2/10/2005	Thursday	7:30	4:30	1.65	1.50	2.02	1.37
2/11/2005	Friday	7:30	4:30	1.13	1.03	1.58	1.10
2/7-2/11/2005		7:30	4:30	1.22	1.11	1.69	1.15
4/10/2005	Sunday	7:30	4:30	1.33	1.48	1.28	1.38
		7:30	8:00 AM	4.50	1.98	0.47	1.53
		8:00	8:30	0.32	0.00	0.03	0.40
		8:30	9:00	0.10	0.00	0.12	0.13
		9:00	9:30	0.05	0.28	0.08	0.15
		9:30	10:00	0.03	0.43	3.43	0.32
		10:00	10:30	0.37	0.13	0.00	0.08
		10:30	11:00	0.18	0.13	0.10	0.08
		11:00	11:30	0.08	0.08	0.07	0.07
		11:30	12:00 N	0.33	0.35	0.20	0.30
		12:00 N	12:30 PM	2.92	0.17	0.33	0.22
		12:30 PM	1:00	1.43	0.07	0.20	0.32
		1:00	1:30	0.20	0.07	1.53	3.22
		1:30	2:00	0.42	0.43	0.03	0.33
		2:00	2:30	0.13	0.00	0.08	0.05
		2:30	3:00	1.73	6.73	1.53	0.47
3:00	3:30	0.08	0.05	1.27	0.13		
3:30	4:00	0.10	0.18	0.73	0.12		
4:00	4:30	0.00	0.00	0.00	0.00		

Even on Sundays when there are fewer agents on duty, with a few brief exceptions during the day, wait times were generally under one minute during the review

Average Wait Time In Queue	FY05	FY06	FY07
Weekday	3.02	4.99	3.50
Saturday	2.52	4.07	2.23
Sunday	1.22	1.79	0.97

The average wait times in the reservation line queue for the last three fiscal years is shown in this table. Data for FY07 is through September 06. During FY06 we did have some server and equipment issues that negatively impacted performance averages for year. But those have largely been corrected as shown in the FY07 data.

It is important to note that we do not have any complaints about long wait times in the phone queue. In years past this was a problem – and customers did in fact call in complaints about their inability to get through on the phone lines. But this is no longer an issue that comes up a public hearings or monthly ADA meetings. We have significantly improved the phone system staffing and dramatically reduced wait times for customers. Our customers have experienced the improvement and no longer complain about this particular aspect of our service.

For reasons cited above, Metro does not plan to take further action with reference to this finding.

**2. During the week of February 7 to 11, 2005, Metro received a total of 4,053 calls to the reservation center. Daily average hold times for the four phone lines ranged from 0.65 minutes to 2.45 minutes. Of the 4,053 calls, 737 were abandoned by the caller for an abandonment rate of 18 percent. This high abandonment rate is an indicator of difficulty in getting through on the phone lines to make reservations. Call Center staffing and equipment limits may be contributing to long hold times and high abandonment rates.**

This is only a partial analysis of the data presented. Looking at just the number of abandoned calls without analyzing the amount of time waiting in the queue for that abandoned call is only telling part of the story.

We do not have the data reports for February 05 as we gave those to the Review Team. But we pulled a quick Abandoned Call Report for Tuesday September 26, 2006. Here is the summary for just the Reservation Lines.

ACD-DN ABANDONED CALLS INTERVAL AVERAGE										
# of Seconds	0-< 12	12-<24	24-<36	36-<48	48-<60	60-<120	120-<180	180-<240	240-<300	300+
Res Line										
4230	104	9	15	10	9	3	20	8	7	6
4240	20	10	15	0	15	5	15	5	5	10
4250	84	8	11	6	8	6	13	8	13	6
4260	88	6	13	14	9	8	16	13	5	1

<b>Total</b>	<b>276</b>	<b>33</b>	<b>54</b>	<b>30</b>	<b>41</b>	<b>22</b>	<b>64</b>	<b>34</b>	<b>30</b>	<b>23</b>
<b>%</b>	<b>45%</b>	<b>5%</b>	<b>9%</b>	<b>5%</b>	<b>7%</b>	<b>4%</b>	<b>11%</b>	<b>6%</b>	<b>5%</b>	<b>4%</b>
<b>% Less than 1 minute wait time</b>										<b>71%</b>

As shown, there were 607 abandoned calls on Tuesday. Of those, 45% hung up almost immediately when they got the first announcement. They may be wrong calls, customers who meant to call the Customer Assistance Line, or customers who are used to getting straight through and will just call back later.

Another 26% hung up in less than 60 seconds. These are callers that are fairly confident they will be able to call back later with an even lower wait time in the queue than 1 minute.

Callers that experience lots of busy signals or routinely have long wait times in the queue do not give up and abandon the call after only 60 seconds. They hang on and on and on and are reluctant to abandon the call for fear they will not get through the phone lines again. We know – in years past our phone service was severely constrained and this is what we experienced at that time. Large numbers of busy signals, long wait times in the queue before the call was abandoned and a large number of complaints about the phone service.

But since we have significantly increased our staffing, doubled the number of phone lines and added a new Customer Assistance Line and kept it staffed with three people during peak daytime hours, the Reservation Lines are moving quite well. And customers expect these lines to move well – their behavior tells the story. If they call and get put into the queue, they are much more likely to hang up and call back later when it is not so busy rather than wait in the queue, even if it is a short wait now.

The abandoned call rate, combined with the very low “wait times to abandonment”, actually indicate that the phone system is not constrained and is quite good. Customers are quite confident about their ability to get through the phone lines and are willing to hang up with very little wait time invested. And we have no customer complaints about the phone service.

For reasons cited above, Metro does not plan to take further action with reference to this finding.

***3. The review team observed 76 calls during the two-day period of April 12 and 13, 2005. These calls averaged over seven minutes to complete. The reservations system being used at the time of the review appeared to be antiquated and slow, contributing to the long call times. Metro was in the process of upgrading its computer reservations system with a scheduled implementation during the summer of 2005.***

We agree with this comment. The system we are using is indeed slow and antiquated and it is being replaced. We have made some server upgrades since the review time was here. Our average talk time for weekday Reservation calls is now averaging between 4.5 to 6 minutes.

The new system is still in the process of being implemented and we are not live on the system as yet.

***4. Metro's advertised Call-A-Ride reservations hours are 7:30 a.m. to 4:30 p.m. During the review, the Reservations Center closed at 4:21 p.m., based on a wall clock that was nine minutes fast.***

This finding has been corrected. The clock in the reservation area has been replaced with a digital clock that automatically maintains the precisely correct time.

***5. Any calls left in the queue at the end of the day were abandoned. As a result, some customers calling before 4:30 p.m. are not being served.***

Actually, Reservation agents answer all calls until the end of their shift at 4:30. If they are in the middle of a call at 4:30, they must continue to handle the call through to completion, even if that takes them past the end of their shift. At that hour of the afternoon on weekdays we have 12-13 agents on the Reservation Lines. Customers understand that the phone lines *close* at 4:30 and the staff goes home. They understand that if they want to make a reservation, they cannot wait until 4:30 to start the call process. We have very few calls coming in after 4pm. We have no complaints about customers getting abandoned in the queue at 4:30. However, we cannot say with certainty that this never occurs. Our phone system is over 20 years old and a new phone system is needed to allow us to ensure that the queue is empty before logging out of the phone system. Metro does not plan to take any further action on this finding until a new phone system is installed.

***6. Metro accepts only four one-way trip requests per call during peak call times. This policy can increase the length of telephone queues by requiring reservationists to handle multiple calls rather than one to serve one customer and placing multiple calls rather than one in the phone queue.***

Actually this policy has been instrumental in improving the phone service for individual customers.

In years past, social service agencies would assign one of their employees to call to book trips for their consumers. One agency would consume an hour or more of phone service time booking trips for 20+ individuals, and all their trips for the following week, getting confirmations on every trip, fare amounts and so forth. We had all the individual workshops, individual dialysis centers, schools and so forth calling like this. It created busy signals for other ordinary consumers trying to get through the phone lines, long wait times in the queue and myriad of other problems.

To solve this problem, we implemented the policy that only two round trips could be booked on one phone call. It totally eliminated this problem. It made each call much shorter, opened up phone capacity for other callers, lessened the wait times in the queue and generally improved phone service in a dramatic fashion. Individual consumers generally don't need to book more than 4 one-way trips or 2 round trips at a time anyway. Most just book one one-way or round trip at a time.

Social service agencies were spurred to enter into contractual agreements to get the kind of specialized service they were looking for. As such, these agencies are no longer taking any time from the Reservation lines. They work with other staff dedicated to contract service and never use the call center resources. The lines are now completely used by individual consumers.

It is important to note that we have not had complaints about the phone system in years. This is not an issue for the vast majority of consumers. In general consumers are getting through the phone lines and getting trips booked with little delay.

For reasons cited above, Metro does not plan to take further action with reference to this finding.

***7. Metro tracks performance by measuring the callers' average time in the telephone queue. This performance measure does not capture the number of callers that have significantly long hold times, which provides a better index of customer service and telephone access.***

Metro's Automatic Call Distribution (ACD) phone system is an older model phone system. Reports generated from the ACD system are somewhat limited but still provide a significant amount of data for performance monitoring. While there is no ability to track each individual call made into the system, data "averages" are still a good indicator of performance. It is also important to note that we are able to look at such averages in 30-minute time increments. This data combined with customer feedback and complaint information give us a good indication of how the phone system is functioning for customers.

Metro is in the process of investigating possible upgrades for our ACD phone system. We are in the very early stages of exploring technology, costs and funding availability. There are no specific plans at this time to replace our current ACD system, but it is being explored for the future.

## D. Trip Reservations and Scheduling

*1. Metro's web site and the Metro Call-A-Ride brochure dated June 28, 2004, advise Call-A-Ride customers to "phone at least 24 hours in advance to schedule your trips." The DOT ADA regulations (49 CFR §37.131(b)) requires the transit entity (Metro) to schedule and provide trips in response to a request for service made the previous day.*

As noted, the brochure "advises" customers to call at least 24 hours in advance – but does not state that it is a "requirement". We also "advise" customers to call as early as possible for trips and let them know they can call up to 7 days in advance. It is never stated as a requirement to call 7 days in advance. We are letting customers know that the vans fill up quickly and if they want a very specific time, they should call as early as possible.

In practice, we accept reservation calls for the next day up to 4:30 pm the day before service. We also accept same-day calls for service and provide them if there is time and space available for the requested trip. We will clarify that reservations are taken through the close of business of the prior day in the next printing of the above documents and the website will be updated when the new printed materials are available.

For reasons cited above, Metro does not plan to take further action with reference to this finding

*2. At the time of the review team's on-site visit, Metro regularly denied trip requests for ADA complementary paratransit service due to capacity constraints. The proportion of denials was generally two percent of total demand on weekdays. Of these denials approximately 20 percent were for next day service requests and 80 percent were for service requests two or more days in advance of the service day. Metro managers said that many of the riders who have their trip requests denied call back on a subsequent day and get a trip. However, Metro has not tried to document this number, and it is not without significant effort on the part of the rider.*

The data as presented here is not a completely accurate description of the denials on the service. It also includes denials from the general public – which are not ADA denials and should not be included in these statistics.

At the present time, the software used to schedule trips is not able to determine if **a trip is ADA required or not**. That is, if the trip origin and destination requested is within ¾ mile of a bus or rail line at the time the bus/train is running. All we can do at the present time is determine if the person requesting a trip is ADA eligible. Since our service is open in certain areas to non-ADA eligible individuals, some of the denials noted by the Review Team are not even ADA related. And some of the denials for ADA-eligible customers are not true ADA eligible trips.



For all of FY2006, there approximately 18 one-way trip denials per day by ADA-eligible customers. That was 0.8% of all requested trips, not 2% as noted above by the Review Team. Additionally, we have no way to determine how many of those 18 trips were actually ADA-eligible trips.

At this time trip denials for ADA-eligible individuals are less than 1%. When we are able to determine trip eligibility, we expect to see that percentage drop even further. When we are able to determine trip eligibility we will be able to screen out ineligible trips and determine what steps, if any, remain to get down to zero ADA-eligible trip denials.

***3. Many trips denied early in the scheduling period can be scheduled later in the scheduling period as a result of trip cancellations and/or route modifications made by proofers. Denial of such trip requests precludes them being served unless the customer calls again at a later time to request the trip.***

Unfortunately our Cancellation & No-show Policy is so lenient that most customers wait until the night before or the day of service to cancel their trips. Data for the last six months shows that 60-65% of all cancellations came in on the day of service or the day/evening before. This does not provide the capacity needed to work in trip denials.

Proofers are “optimizing” routes to eliminate backtracking, long ride times, trips in the middle of workshop routes and so forth. Proofing the routes rarely, if ever, creates more capacity. In fact, it generally results in trips that don’t fit well on routes and are assigned to the clean-up vans for the next day. And proofing is not done until the day before when the trips are largely known. Customers needing trips for important appointments do not wait until the night before to firm up their travel plans. They have generally made alternative arrangements.

This is just not an operational recommendation for trip denials. Our plan is to determine how many denials are actually ADA-eligible trips before we determine what additional steps, if any, are still required.

***4. The Metro scheduling software does not include a function to schedule trips to meet appointment times. Reservationists record appointment times requested by callers in the software system and can attempt to place the trip on the run they feel is most appropriate. However, Metro has not set up PASS to schedule by appointment time.***

This is not an accurate description of the appointment time capabilities of our current software.

Our scheduling practice is to attempt to provide every customer with a ride time of 45 minutes or less depending on the length of the trip. If the customer has a work or medical appointment, having sufficient travel time is even more important because traffic and other customer delays are inevitable.

The practice is to enter the customer's appointment time in the trip request and then back up the pickup time 45 minutes. This will ensure that if the van arrives in the late +/-15 minute window, the customer will still have sufficient time to make the appointment time. If the trip will take longer than 45 minutes, the software will show this during the scheduling process – the appointment time will be coded red indicating that the van will be late for the appointment. Then the reservationist will work with the pickup time on different routes, or back up the pickup time, until we find a route that can make the trip and get to the appointment on time.

We have found this to be a much more reliable means of scheduling trips with appointment times. It ensures that there is sufficient time to actually meet the appointment time.

For reasons cited above, Metro does not plan to take further action with reference to this finding

## E. Service Performance

***1. Metro's policy standard for service denials does not appear to consider all denials. Metro's policy standard is zero denials for requests made the previous day. Metro accepts service requests seven days in advance of the service day, and "Metro Call-A-Ride Easy Trips" brochure encourages customers to call early to make trip reservations. Denying a trip more than one day in advance of the service day, thereby requiring multiple calls to schedule a trip, appears to limit access to the service and constitute a capacity constraint.***

The ADA Regulations are very specific about what constitutes a trip denial. Only next-day trip denials are discussed in the ADA Regulations. Transit properties should not be penalized for attempting to make the service as convenient as possible by allowing customers to make travel arrangement more than one day in advance.

We have discussed this subject with the disabled community before. We could implement a service plan that only allows next-day reservations and scheduling. It would probably cut down on cancellations and no-shows and possibly reduce denials. It would probably be easier and more cost effective for the transit system. When given this choice, however, customers have indicated a very strong preference for the advance scheduling convenience over next-day scheduling. They were willing to accept a few advance-day denials for the convenience of advance-day scheduling.

For reasons cited above, Metro does not plan to take further action with reference to this finding

***2. The review team's analysis of a one-day sample indicates that 64 (2.5 percent) of trip requests for service on February 9, 2005 were denied. During the period June through December 2004 Metro reported next day denials of 0.6 percent. Metro indicated that some customers who are denied service more than one day in advance of the service day call back and eventually reserve their requested trip.***

This is a simple mistake on the part of the Review Team.

As noted earlier, Metro's Call-A-Ride service is *open to the general public* in certain areas and on certain days. Some of the trip requests from the general public also result in denials. When reviewing the data on denials, one must also look at the ADA eligibility of the customer whose trip was denied.

ADA eligible customers have a fare code of P (Plus fare) or D (Double Zone fare). All other fare codes are for the general public. If the Review Team analyzes the Trip Denials by Fare Code they will see that trip denials for ADA eligible customers for next day trips are indeed as reported. The data being reported by the Review Team is in error – it is denials for ALL customers *including the general public*.

It is further important to note that these denials may not be ADA eligible trips – we cannot determine those at this time. As such, true ADA denials are most likely much less than reported at present.

For reasons cited above, Metro does not plan to take further action with reference to this finding  
**3. Metro appears to have no policy for missed trips.**

That is not accurate – our policy is to have NO missed trips. The Review Team spent a considerable amount of time in our Dispatch Center where we showed them how “missed trips” are handled.

Missed trips result from several operational events. One such problem is a customer calls us stating that they are not ready yet – they are still in the doctor’s office or wherever and they will need a later ride. The dispatcher unschedules that trip and marks it a “will call” so it can be scheduled later when the customer calls back. Very frequently these customers do not call back. They have been admitted to the hospital, a family member came for them or some other such event occurred.

Sometimes the customers call and ask us to come back in an hour. We reschedule, come back and still can’t find them. Again, they are marked as a will call since we are hoping to hear from them again.

If we are late beyond the 15-minute window and cannot find the customer, we mark these trips as System No-Shows and they are not charged to the customer. These are missed trips. This is just not a very frequent occurrence. If we are running late, the dispatch center staff normally calls the customer to tell them so, or the customer calls in to find out where their van is. We rarely have “missed trips” because our communication with the customers is generally very good.

The table below shows ALL customer no-shows, late cancellations, no fault no-shows, system no-shows, and erroneous trips for the last three years. As shown, we have very few system no-shows or missed trips per year. The average is about 2 or 3 per day. They represent about 1% of all no-show/late cancel/no fault no-show/ system no-show type trips.

NS_TYPE	2004	2004%	2005	2005%	2006	2006%
CNS Client No-Show	11,609	16%	10,989	17%	7,769	16%
LAT Late Cancel	38,642	54%	32,785	51%	24,131	50%
NNS No Fault No-show	19,004	26%	18,170	28%	14,611	30%
SNS System No-show	951	1%	764	1%	600	1%
XXX Erroneous Trips	1,812	3%	1,778	3%	1,112	2%
	<b>72,018</b>	<b>100%</b>	<b>64,486</b>	<b>100%</b>	<b>48,223</b>	<b>100%</b>

***4. Based upon a review of Call-A-Ride data reports for February 9, 2005, it appears that Metro does not record missed trips as a category for performance monitoring purposes. Missed trips appear to be grouped with customer no-shows and late cancellations.***

Metro has found that 2 or 3 missed trips per day are a statistically insignificant number of trips to attempt to report in a separate category.

***5. Analysis of data for the sample day indicated that for 14 trips (0.7 percent of the 2,019 trips dispatched on the service day) that were not completed, the vehicle arrived at the pickup address more than 15 minutes after the scheduled time. For 57 trips (2.8 percent) that were not completed, there was no vehicle arrival time. All of these trips could be missed trips—resulting in as many as 71 (3.5 percent) missed trips. Some of these trips could also be late cancellations.***

As shown from the table above, for the last three years, missed trips or system no-shows have averaged less than 3 trips per day. Erroneous trips are not charged to anyone. Sometimes we have a trip for a customer who insists they never booked that trip. Or, a customer whose subscription is “on hold” for a temporary illness that comes back on the schedule and they are still not riding due to illness or such and the customer forgot to call again. There are many ways to get erroneous trips in the schedule. We just mark these off the schedules so customers are not charged with these types of trips.

***6. Metro has two standards for on-time performance. For the customer, the standard for on-time is a vehicle arrival between 15 minutes before and 15 minutes after (-15/+15) the scheduled time. For performance measurement and reporting the standard is 15 minutes before and 20 minutes after (-15/+20) the scheduled time. Use of one standard for the customer and a more generous standard for performance measurement overstates the level of service being provided to the customer.***

This is not an accurate representation. When a customer is booked for a trip on our service, they are given an “approximate pickup time” – not a guaranteed pickup time. The Scheduling Software will move that scheduled trip up and down in the scheduling window to accommodate other trips that are added to the route. This is absolutely essential to enable productive cost-efficient scheduling.

The important point is that the actual pickup time on the day of service could be at the very end of the 15-minute window depending on how the system has scheduled all of the trips for a given route. On our bus and rail service, on-time performance is measure as:

- 0 – 59 seconds early; and
- 0 – 5 minutes late

If the bus/train arrives at the designate stop within those parameters, it is measured as “on-time” by our internal standards. This is a very common standard around the transit industry as well.

We measure our van service with the same standards. Since the Scheduling Software can move the trip to the very end of the 15-minute window, the trip is measured on-time as long as it is within 0-5 minutes late of the scheduled time – in this case the end of the 15 minute window.

Since the van will sit at a location until the beginning of the early window, and customers only need come out when they are ready, there is no penalty for being early. Unlike the bus or rail service – we never leave customers stranded for being too early. Drivers are not allowed to go in and get customers before the early window and dispatchers will never call before the early window.

For reasons cited above, Metro does not plan to take further action with reference to this finding

***8. On the sample day, there were 306 (16.1 percent of completed trips) picked up early. Of that number, 35 (1.8 percent of completed trips) were picked up more than 16 minutes early; of those trips, 11 (0.6 percent of completed trips) were picked up more than 30 minutes early. Very early pickups could indicate that customers are being pressured to accept early departures.***

That is not the case. Drivers are not allowed to go in and get customers before the early window and dispatchers will never call before the early window. We have no complaints from customers about being pressured to go early, indeed, many customers welcome the opportunity to depart “early” if they are ready for the trip. We do have drivers that know their customers – and they know if they will appreciate going early or not.

***9. Of 833 trips with scheduled drop-off or appointment times, 710 (85 percent) were early or on-time and 123 (15 percent) were late. Of these late drop-offs, 34 (4.0 percent) were more than 15 minutes late; of this number, 18 (2.1 percent) were more than 30 minutes late. These late drop-offs, potentially resulting in late arrivals for work, school, or medical appointments, could be considered a constraint to use of the service by paratransit eligible individuals.***

As noted by the Review Team we go to great lengths to ensure on-time performance for our customers. Scheduling parameters by time of day are used to approximate running times throughout the day. MDTs are used to monitor service in real time and move trips. Five vehicles and 10 drivers are kept clear all day every day to use in keeping trips on time. There is very little else that can be done. Some trips on some days will be delayed – it is unavoidable.

It is unfortunate – but traffic and customers themselves are the single biggest cause of service delays. However, 52 late trips out of 2,100+ scheduled trips is a small number (less than 2.5%). We get very few complaints about late trips. It does not appear to be a constraint at this time.

For reasons cited above, Metro does not plan to take further action with reference to this finding

***10. From a sample of 29 long trips on February 9, 2005, 21 (1.1 percent of the completed trips) exceeded Metro's standard of 90 minutes for intra-zonal trips. 15 (0.8 percent) of the 29 long trips sampled were more than 30 minutes longer than a comparable fixed route trip and 7 (0.4 percent) were more than 46 minutes longer. Five of the trips that were more than 30 minutes longer than a comparable fixed route trip were to or from the same location. This appears to be a pattern of significantly long trips.***

Seventeen of the 29 trips on the Review Team's spreadsheet were sheltered workshop trips under contract for the Department of Mental Health or other contract trips. These routes were developed in concert with the DMH staff since they are paying for the service. We have offered to add routes but they do not want to pay for them in some instances. In others, the long ride times are due to parental/guardian requirements as to when the client must be picked up and/or how early they can be brought home. The van is being used, on occasion, as a safety net for some individuals under "protective oversight" until they can be delivered to an authorized adult.

As noted earlier by the Review Team, we have a scheduler review and proof all of the trips and routes every day before service. One of the reports we routinely run is a Ride Length report, which shows every single trip longer than 45 minutes. The Scheduler will make every attempt to shorten non-contract trips and is generally successful. We have very few complaints about ride length. The scheduler is not allowed to make modifications to these contract routes.

## **E2. Transportation Operations**

***3. Metro has a “no strand” policy for riders with return trips. If a rider calls after the vehicle has left, Metro will not record this as a passenger no-show, but will re-classify the trip as a will-call for later pickup.***

We have tried various methods for tracking missing customers, including the one suggested by the Review Team. The method we are using now is operationally the best.

Marking a customer a no-fault no-show and rescheduling ANOTHER TRIP is very time consuming. The address and such all needs to be typed again and the dispatch center may be quite busy when the customer calls back. Having the original trip on Route 0 as a will-call makes this so much simpler. The dispatcher just changes the time and reschedules with one keystroke.

Additionally, scheduling ANOTHER trip exaggerates the number of trips that were actually scheduled that day. It makes the number of no-shows look larger and the number of scheduled trips larger than they actually were. We have enough of these trips throughout the day given the large number of medical trips we provide, that this practice would actually result in very misleading statistics.

***4. Metro appears to have the capacity to accommodate some trips that could not be scheduled before the service day by assigning those trips to “Route 0,” as well as using capacity made available from cancellations and available on the “clean up” runs. This capacity could be used to reduce or eliminate trip denials.***

While we agree that there is some limited capacity during the day to accommodate some trips, we disagree with this recommendation. Our service is at capacity most of the time and the clean-up vans are needed to maintain on-time performance, respond to passenger emergencies, respond to operational issues like road calls or traffic conditions, and cover operator absences. We cannot fill these vans with denials.

We may be able to implement this recommendation for ADA Eligible customers taking an ADA Eligible trip when our new software is implemented. Only next day trips that meet these strict ADA conditions would count as a true ADA denial. We anticipate that these will be quite small and we may be able to work these in. We will examine this recommendation in more detail when we are able to identify qualifying ADA trips.

***7. Drivers cited illogical routing and tight schedules as a concern.***

Sometimes trips just don't fit well into any route. This is especially true of long-distance trips that cross several zones. But our job is to serve all of the trips no matter how “illogical” they may seem. Drivers dislike these long distance trips and complain about them; however, such trips are necessary to provide the required service. We will continue to proof our schedules prior to service and move trips when possible on the day of service. No additional action is planned.



## **F. Resources**

***1. Staffing of the Call-A-Ride call center appears to limit access by customers to reserve trips. New reservations software and procedural changes to reduce call volume should increase efficiency of the reservations process, but additional staffing will likely be required to reduce hold times to a level that does not significantly impeded access to service.***

We disagree. Average wait times in the queue are quite good for a public agency. Abandoned call times indicate customers are confident of getting through the phone lines. There are no customer complaints about the phone system. There is no impeded access to the service due to the call center.

We currently have 12-14 people assigned to the Reservation lines on weekdays. This is approximately the same schedule as when the Review Team was on site. The schedule currently in effect is in the table on the next page. As shown, there is very adequate staffing including a relief dispatcher.

We have also made a concerted effort to improve staff attendance, which is not as good as van operator attendance at present. This will address some of the vacant seats that the Review Team noted due to missing staff during the review. We are also utilizing temporary help in the call center to ensure that we have adequate staffing at all times.

***3. Increased demand for service may require an increase in the number of runs and associated increases in the number of drivers and vehicles.***

We anticipate being able to perform trip-by-trip ADA eligibility determinations with our new software. We are fairly confident that this analysis will confirm that we are providing some trips that may not be required by the ADA regulations. Demand for true ADA trips may actually be lower than anticipated. Since 2001, the paratransit van fleet has doubled and Metro will continue to budget to meet anticipated demand.

STAFF PERSON	ASSIGNMENT	M	T	W	R	F	A	U	WKDAY HOURS	WKEND HOURS
	<b>Phones</b>	15/1	14/1	15/1	14/1	14/1	6/1	7/1		
Mary	Call Center Supervisor		X	X	X	X	X		730 - 1630	730 - 1630
Jeff	#1 Dispatcher	X	X	X	X	X			730 - 1630	
Trish	#2 Dispatcher	X	X	X	X	X			730 - 1630	
Paul	#3 Dispatcher	X	X	X			X	X	730 - 1630	730 - 1630
TEMP	#4 Dispatcher	X	X	X	X	X			730 - 1630	
D' Ann	#5 Dispatcher		X	X	X	X	X		730 - 1630	730 - 1630
Kevin	#6 Dispatcher	X	X	X			X	X	730 - 1630	730 - 1630
Peggy	#7 Dispatcher	X	X	X	X	X			730 - 1630	
Mamon	#8 Dispatcher	X			X	X	X	X	730 - 1630	730 - 1630
Ken	#9 Dispatcher	X	X	X	X			X	730 - 1630	730 - 1630
Molly	#1 Res. Clerk			X	X	X	CPM	CPM	730 - 1630	1330-2230
Gia	#2 Res. Clerk	X	X	X	X	X			730 - 1630	
TEMP	#3 Res. Clerk	X			X	X	X	X	730 - 1630	730 - 1630
Cindy	#4 Res. Clerk	X	X	X	X			X	730 - 1630	
Laura	#5 Res. Clerk	X	X	X			CAM	CAM	730 - 1630	430-1330
VACANT	#6 Res. Clerk								730 - 1630	
Manda	#7 Res. Clerk	X	X	X	X	X			730 - 1630	
Jessie	#8 Res. Clerk	X	X			X	X	X	730 - 1630	730 - 1630
TEMP	#9 Res. Clerk -	X	X	X	X	X			730 - 1630	730 - 1630

**AM Radio Dispatch**

Bruce	Dispatch Center Supervisor	X	X	X	X	X			300 - 1200	
Andrea	#10 Dispatcher	X	X	X	X	X			500 - 1400	
Teresa	#11 Dispatcher	RD	RD			RD	RD	RD	800 - 1700	800 - 1700
Mark	#12 Dispatcher			PH	PH	PH	RD	RD	730 - 1630	400 - 1300
TEMP	#10 Res. Clerk/Cust Assist	CAM	CAM	CAM	CAM	CAM			400 - 1300	
CC	#11 Res Clerk/Cust Assist	CA	CA	CA	CA	CA			730 - 1630	

**PM Radio Dispatch**

Dan	Dispatch Center Supervisor	X	X	X	X	X			1200 - 2100	
Eloise	#13 Dispatcher	X	X	X	X	X			1700 - 0200	
Andy	#14 Dispatcher			RD	RD	PH	RD	RD	800 - 1700	1700 - 0200
TEMP	#12 Res. Clerk/Cust Assist	CPM	CPM	CPM	CPM	CPM			1300 - 2200	
Ivo	#15 Dispatcher	Vacation Relief OR Special Weekly Assignments								

<b>NOTES:</b>	X: scheduled workday	PH: scheduled Reservations	Weekday Cust Line	Weekend Cust Line
<b>NOTES:</b>	X: scheduled workday	PH: scheduled Reservations	Weekday Cust Line	Weekend Cust Line
Radio 0800-1000 & 1200-1300:M/Ken, T/Peggy, W/D' Ann,R/Mamon, F/Andy			CAM - 400-1300	CAM - 430-1330

**Attachment B**

**On-Site Review Schedule**

**ADA Complementary Paratransit Service Review  
St. Louis Metro (Metro): St. Louis, Missouri: April 11-14, 2005  
Schedule**

<b>Time</b>	<b>Activity</b>	<b>Who</b>	<b>Where</b>
<b>Monday, April 11, 2005</b>			
9:00 a.m.	➤ Opening Conference	All	Board Room, 6 <sup>th</sup> Floor 707 North First St
10:00 a.m.	➤ Review policies & procedures information provided, & additional data requests with Metro Managers	All	707 North First St
11:00 a.m.	➤ Review service area ➤ Review Call-A-Ride/Metro budget process ➤ Review eligibility process & records ➤ Review complaints	Knight Kidston Chia Regan	Planning Dept. ADA Office Customer Service
1:00 p.m.	➤ Review Call-A-Ride demand equipment & staffing ➤ Review eligibility records ➤ Review complaints	Kidston  Chia, Knight Regan	ADA Office  ADA Office Customer Service
2:30 p.m.	➤ Review service area ➤ Summarize observations of complaints ➤ Interview eligibility assessors & review records	Knight, Kidston Regan Chia	Planning Dept. 707 North First St 4444Forest Park Ave.
3:00 p.m.	➤ Analyze and document Metro service area, fares & hours ➤ Analyze & document Metro resources ➤ Continue to summarize complaints ➤ Continue to review eligibility assessors & review records	Knight  Kidston Regan, Chia	  707 North First St.  4444Forest Park Ave.
<b>Tuesday, April 12, 2005</b>			
7:00 a.m.	➤ Tour Facility	All	3300 Spruce
9:00 a.m.	➤ Observe call takers; record trip request information	All	3300 Spruce
9:30 a.m.	➤ Interview schedulers, observe scheduling ➤ Interview Drivers ➤ Interview Call Center Manager & Records	Chia, Kidston Knight Regan	3300 Spruce
11:00 a.m.	➤ Interview Dispatcher ➤ Interview Drivers ➤ Review telephone system and performance	Chia, Kidston Knight Regan	3300 Spruce
1:00 p.m.	➤ Analyze scheduling & Dispatch Procedures & Practices ➤ Analyze operator manifests & service performance reports ➤ Analyze telephone system performance & reservation procedures & practices. ➤ Interview Drivers	Chia  Kidston Regan Knight	3300 Spruce
3:00 p.m.	➤ Observe call takers; record trip request information ➤ Observe Dispatch	Regan, Knight  Chia, Kidston	3300 Spruce
<b>Wednesday, April 13, 2005</b>			
6:45 a.m.	➤ Interview drivers	All	3300 Spruce
8:00 a.m.	➤ Analyze Eligibility, Scheduling & Dispatch data & procedures ➤ Analyze operator manifests & service performance reports ➤ Document & analyze driver interviews, telephone access & reservations procedures & practices ➤ Document & analyze service area, hours & fares	Chia  Kidston Regan Knight	3300 Spruce
1:00 p.m.	➤ Continue analysis	All	3300 Spruce
<b>Thursday, April 14, 2005</b>			
Morning	➤ Complete preliminary data analysis & remaining detail work ➤ Prepare materials for debriefing session	All	  707 North First St.
1:00 p.m.	➤ Exit Conference	All	Board Room, 6 <sup>th</sup> Floor 707 North First St

## **Attachment C**

### **Metro Call-A-Ride Brochure**

**Attachment D**

**ADA Paratransit Application**

**Attachment E**

**Metro Unconditional Eligibility Letter**

**Attachment F**

**Metro Conditional Eligibility Letter**



## **Attachment G**

### **Metro Not Eligible Letter**

## **Attachment H**

### **Metro Temporary Eligibility Letter**

## **Attachment I**

### **Metro Mobility Aid Not Eligible Letter**

**Attachment J**

**Call-A-Ride Plus Identification Card**

## **Attachment K**

**“Public Transit Options for Customers with Disabilities”**

## **Attachment L**

### **ADA Paratransit Eligibility Appeals Process**

## **Attachment M**

### **Call-A-Ride Service Zones**

**Attachment N**

**Analysis of St. Louis Metro Data**

**for**

**Trip Disposition**

**On-Time Performance**

**and**

**Trip Duration**



The project team chose Wednesday February 9, 2005 as a sample day for analysis of Metro Call-A-ride performance in providing ADA complementary paratransit service. Metro provided their trip data in an Excel spreadsheet for that day on a compact disk. The data has been used to perform an independent analysis of trip disposition and service performance.

**Table N.1 – Trip Data Fields**

<b>COLUMN</b>	<b>LABEL</b>	<b>COLUMN</b>	<b>LABEL</b>
A	BUS	AN	BDY
B	LAB	AO	CALLDATE
C	RIDERS	AP	FS
D	EQUIP	AQ	NETNODE
E	ID	AR	AIDES
F	CALL	AS	REASON
G	ETA Negotiated	AT	PROVIDER
H	ETACALC Estimated	AU	TRACKER
I	APPTIME Requested	AV	SPEEDFCTR
J	PD (Pickup/Dropoff)	AW	ORIGETA
K	ADDRESS	AX	SATISFIED
L	APARTMENT	AY	NEGETA
M	CITY	AZ	PURPOSE
N	BUSCOLOR	BA	FAREAMT
O	DATESTAMP	BB	AREAS
P	ADDLOADTIM	BC	MAPGRID
Q	COLLECT Actual Time	BD	VERIFIED
R	XCOORD	BE	DOOR_CURB
S	YCOORD	BF	FARE_COLL
T	ROUTER	BG	ARRIVE
U	VEHICLE	BH	PHONE
V	DRIVER	BI	EARLYTIME
W	COMMENTS	BJ	FAREBDY
X	Disposition	BK	AVLUPD
Y	CAPCALC	BL	INADA
Z	CAP1CALC	BM	DATEFIELD
AA	CAP2CALC	BN	ZIP_CODE
AB	CAP3CALC	BO	AUTHORIZED
AC	CUSTNUM	BP	AUTHO_CODE
AD	CUSTNAME	BQ	REFERRAL
AE	SLACK1	BR	CONTACT_N
AF	PX	BS	CONTACT_P
AG	PY	BT	CONTACT_F
AH	TRIPTYPE	BU	CONTACT_PA
AI	FARETYPE	BV	WEIGHT
AJ	ODOMETER	BW	CONTACT_E
AK	TRIED	BX	CONTACT_FA
AL	ETAEARLY	BY	STATE
AM	NEXTLAB Stop Order		

The spreadsheet contains 5,597 rows representing records of trip information and 77 columns representing characteristics of each trip. The 77 characteristics measured for each trip are labeled as presented in the preceding table.

### **ADA Complementary Paratransit Trips**

Since Metro Call-A-Ride is a member of a TMA it serves both ADA complementary paratransit trips and non-ADA trips. To distinguish between the two Metro uses the fare codes assigned to each trip.

A table of the codes as provided by Metro in November 2006 appears below:

FARE TYPE	DESCRIPT	Appears in the Feb 9, 2005 database
A	ADA TRANSFER TO	Yes
B	ADA TRANSFER FROM	Yes
C	COMPANION	
D	CAR PLUS DOUBLE ZONE CHARGE	Yes
E	NON-ADA COMPANION DBL ZONE	Yes
F	FULL FARE	Yes
G	NON ADA WITH FF PASS/TICKETS	Yes
H	NON ADA WITH REDUCED PASS/TCKT	Yes
I	ADA TRIP WITH FF PASS/TICKET	
J	ADA FARE W REDUCED PASS/TICKET	Yes
K	CHESTERFIELD CONN E/H FARE	
L	CHESTERFIELD FULL FARE	
M	NO FARE – AMBULATORY	Yes
N	NO FARE - DISABLED ONLY	Yes
O	ADA TRANSFER TO BUS	Yes
P	ADA ELIGIBLE FARE	Yes
Q	CHESTERFIELD E/D + TRANSFER	
R	ADA MULTI ZN W RED PASS/TICKET	Yes
S	FULL FARE TRANSFER TO BUS	
T	CHESTERFIELD CON FF + TRANSFER	
U	FULL FARE STUDENT TICKET	
V	TMA WHEELCHAIR ADDITIONAL PAX	
W	TMA WHEELCHAIR/MILE	
X	TMA AMBULATORY/MILE	Yes
Y	TMA AMBULATORY ADDITIONAL PAX	

Metro managers indicated that they use the shaded fare codes for analysis of ADA service. The column on the right side of the table identifies those categories that appear in the data set for the sample day. Metro managers also indicated that category N includes trips paid for by a party other than the passenger such as Medicaid, training centers or others. Some passengers who use these services have been certified as eligible for Call-A-Ride ADA services while others have not been. Metro indicate many of the passengers who use this fare code and are not certified would be eligible for ADA complementary paratransit were they to apply. Accordingly Metro

managers indicated that they include this category when performing ADA service analysis. In addition, Metro managers thought that attendants were sometimes included in this fare category.

Metro managers indicated that category M, like category N, includes trips paid for by a third party. Unlike category N, trip makers in category M are ambulatory. Metro managers felt that most of the category M passengers would not likely be eligible for ADA complementary paratransit service. Category M accounted for 3.9 % of requested trips on the sample day whereas category N accounted for 49.5%. If some category M trip makers were ADA eligible, some category N trip makers may not be eligible. Absent more detailed information on customer's eligibility status it is assumed that over or undercounting of eligibility in these two categories would be somewhat off-setting and that inclusion of category N and exclusion of category M should provide a representative indication of service performance for the sample day.

In addition to the fare categories included on the list there were several other fare categories included in the data sample. These were:

**FARETYPE**

blank  
010  
063  
DE  
FF  
FG  
GC  
Z

The number of trips in each of these fare categories, except for blank and Z were 1 or 2 trips. The total number of trips involved is so small, whether included in the analysis or not, is likely to have little impact on how well the analysis represents performance of ADA service.

There were 13 trips identified as category Z for the sample day. A definition for category Z provided at the time of the review by Metro is as follows:

*ADA STD TKT/MULTI ZN W FF PASS*

This definition appears to be similar to that of Fare Type I in the above list. Accordingly it is assumed that trips in fare type Z are ADA trips.

There is a discrete record in the data base for each trip origin and destination. Accordingly, "no fare" is typically recorded for one record (usually destination) for each trip. For the sample day there were 5,597 trip records. Of this number 3,031 were categorized as no fare. Included in these no fare records are non-revenue activities such as driver's return "dead head" to the garage at the end of the work day or driver's breaks. Removing these records from the analysis, results in 5,030 records of 2,515 unique trip requests. The resultant number of no fare pick-ups for trips performed is 19. Metro managers indicated that passenger attendants are included in the no fare category.

“ADA FARE WITH FF PASS/TICKET” was categorized as “I” in the November 2006 fare table. This is a change from the fare table used on the February 9, 2005 sample day. At that time this fare type was categorized as “H.” Accordingly, category “H” fares are included as ADA trips and Category “I” are not.

Based on the foregoing for the purpose of providing indicators of service performance for ADA complementary paratransit customers, trip records with the following fare types have been considered in the analysis of ADA complementary paratransit service and all other fare types were deleted from the data files.

**Table N.1a – ADA Fare Codes**

<b>Code</b>	<b>Description</b>
A	ADA TRANSFER TO
B	ADA TRANSFER FROM
D	CAR PLUS DOUBLE ZONE CHARGE
H	ADA FARE WITH FF PASS/TICKET
J	ADA FARE W REDUCED PASS/TICKET
N	NO FARE - DISABLED ONLY
O	ADA TRANSFER TO BUS
P	ADA ELIGIBLE FARE
R	ADA MULTI ZN W RED PASS/TICKET
Z	ADA STD TKT/MULTI ZN W FF PASS

Deleting all records except those with fare types listed in Table N.1a resulted in 2,169 records representing ADA complementary paratransit trips on February 9, 2005.

## **Trip Disposition**

Column X represents trip disposition. The codes contained in this column are as shown in Table N.2.

**Table N.2 – Disposition Codes**

<b>Code</b>	<b>Trip Disposition</b>
P	Performed
C	Early Cancel
W	No Show
N	Late Cancel & Missed Trips
Blank	Refused & Denied Trips

Since most trips are coded in pairs in the spreadsheet (one row represents pick-up and another row represents drop-off in Column J for the same ID appearing in Column E), and most drop-off records have a non-ADA fare code of blank, the 2,169 rows or records actually represent 2,116 unique trip pick-up requests. Table N.3 shows the breakdown by trip disposition as coded in the report.

**Table N.3 – Recorded Trip Disposition**

<b>Trip Disposition Codes</b>	<b>Number of Rows or Records</b>	<b>Number of ADA Trip Pick-up Requests</b>	<b>% of Total ADA Trip Pick-up Requests</b>
P = Performed	1634	1634	77.2%
C = Early Cancel	358	348 <sup>1</sup>	16.4%
W = No Show	0	0 <sup>2</sup>	
N = Late Cancel & Missed Trips	91	91 <sup>2</sup>	4.3%
Blank = Refused and Denied	86	43 <sup>3</sup>	2.0%
<b>TOTAL</b>	<b>2169</b>	<b>2116</b>	<b>100.0%</b>

NOTES:

- <sup>1</sup>Although most drop-off records coded with trip disposition code C have a non-ADA fare of blank, there are 10 drop-offs with an ADA fare of N. Therefore the 358 records of early cancel ADA trips actually represent 348 unique trip pick-up requests.
- <sup>2</sup>Records coded with trip disposition codes W and N were found to represent drop-offs and pick-ups respectively for the same scheduled set of trips, and so count as one set of 91 trips. Although no disposition code W records appear in this analysis because they have a non-ADA fare of blank, they are nevertheless represented by their pick-up counterparts with disposition code N having valid ADA fare codes as listed in Table N.1a. For further discussion, see section *Late Cancel, Missed Trips, and No Shows* below.
- <sup>3</sup>Records coded with a blank trip disposition code were found to have both a pick-up record and a corresponding drop-off record with the same fare. Hence the 86 records of refused and denied ADA trips actually represent a set of 43 unique trip requests.

### Refused and Denied Trips

There were 86 records in the spreadsheet where the trip disposition code was left blank. For these records, all had a zero value for BUS in Column A, indicating that the trips were not taken. This represents 43 trip requests (pick-up/drop-off pairs as coded with a “+/-” in Column J), or 2.0% of all 2,116 trip pick-ups requested on February 9, 2005.

To further analyze the refused and denied trip request data, subtotals by TRIPTYPE in Column AH were calculated, as displayed in Table N.4.

Since the spreadsheet contained no data on pick-up time requested, it was not possible to determine the responsiveness of the service offers with respect to pick-up requests.

The review team’s analysis also noted that 13 of the capacity denial trips did have an appointment time request in Column I. Since there was no corresponding column in the spreadsheet measuring estimated or promised drop-off time, there was no way to calculate whether the offer was responsive with respect to drop-off time.

**Table N.4 – Trip Denial by Type**

<b>Trip type code</b>	<b>Number of denied trips</b>	<b>% of denials</b>
A = Adversarial denial	1	2%
C = Capacity denial	42	98%
<b>TOTAL</b>	<b>43</b>	<b>100%</b>

Based on the foregoing review, on the sample day of 2,116 trips requested, 42 or 2.0% were denied. This exceeds the 0.6% of next day denials reported by Metro. As indicated by Metro some of the customers whose trip is denied more than one day before the service day may successfully schedule their trip at another time. Others may opt not to make the trip or travel by other means.

## **Scheduled Trip Requests – Not Completed**

Deducting the 43 denied trips from the total 2,116 trips requested results in 2,073 scheduled trips for the sample day.

Trips that have been scheduled are either completed (performed) or not completed. Trips that are not completed can result from the action of the customer or the operator. Trips not completed because of the customer's action are cancellations and no shows. Customer cancellations are typically categorized as early or late. Early cancellations permit the operator to reallocate manpower and equipment with some inconvenience. This inconvenience is often offset by making available service capacity on the service day to address unforeseeable needs. Late cancellations (an hour or two before the scheduled time) severely limit the operator in reusing scheduled resources to serve other customers. As with customer no shows, late cancellations are usually discouraged by the operator.

Trips not completed because of the operator's failure are missed trips. DOT ADA regulations (49 CFR §37.131(f)(3)(B)) prohibit transit entities from limiting service availability through patterns or practices that result in substantial number of missed trips. For purposes of measuring performance against the regulatory criteria, missed trips are defined as trips that were not served when the customer was available for the trip throughout the pick-up window (-15/+15). That is, the vehicle did not arrive in the pick-up window and the trip was not completed.

**Early Trip Cancellations.** Trip disposition code C represents trips cancelled early. There were 358 records in this category. However, 10 records were drop-offs ("-” in Column J) for corresponding trip pick-ups (same ID in column E). Eliminating these records from this category, we tabulated 348 trip pick-up requests that were cancelled early. This represents 16.4% of all 2,116 trips requested on February 9, 2005.

Because the spreadsheet contained no column for cancellation time, it was not possible to verify that these trips were indeed early cancellations. In fact, 9 of the 348 early canceled trips contain a vehicle arrival time in column BG of the spreadsheet, suggesting that the cancellation may not have been "early enough" to avoid an attempted pick-up trip or the cancellation was not communicated to the driver in timely manner. 6 of the 9 cancelled trips with a vehicle arrival time, list the bus number as "0," thereby calling some of the recorded information further into question.

**Late Cancel, Missed Trips, and No Shows.** Deducting the 348 early cancellations from the 2,073 scheduled trips leaves 1,725 trips dispatched.

Trip disposition code N represents both trips cancelled late and missed trips. There were 91 records in this category. All of the records were coded with a “+” for pick-up in Column J.

Trip disposition code W represents no-show trips. There were no records in this category containing a valid ADA fare. All of these records in the Excel spreadsheet from Metro were coded with a “-” for drop-off in Column J and a blank fare in Column AI.

When trips with disposition codes N and W were combined and sorted by ID (Column E), each pick-up record for a late cancel/missed trip had a corresponding drop-off record coded as a no-show. The disposition data in Column X appears to make no distinction between late cancel, missed trips, and no-shows. These records together represent one set of 91 trip requests that were either: late cancels, missed trips, or no-shows, or 4.3% of all 2,116 trip pick-ups requested on February 9, 2005.

To distinguish among the three categories, the review team examined the data in columns G (ETA Negotiated) and BG (ARRIVE). Variances between actual vehicle arrival time and promised arrival time enabled us to sort the 91 trip requests by intervals within targeted ranges and categorize them as follows:

- If the trip contained a vehicle arrival time within +/- 15 minutes of the promised arrival time, the trip was assumed to be a customer “no show.”
- If the trip contained a vehicle arrival time outside the +/- 15-minute window of the promised arrival time, the trip was assumed to be a “missed trip.”
- If no vehicle arrival time was recorded for the trip, it was assumed that either the trip was cancelled in time to avoid the vehicle traveling to the pick-up location or the vehicle simply never arrived at the pick-up location. These trips could be either late cancellations or missed trips.

The results of the analysis of late cancel, missed trips, and no shows appear in Table N.5.

Of the 1,725 trips dispatched, 34 or 2.0 % were no shows, 0 to 47 or 0 % to 2.7 % of the trips were late cancellations, and 10 to 57 or 0.6% to 3.3% were missed trips.

**Table N.5 – No Shows and Missed Trips**

	<b>No shows</b> (Arrival +/-15 min. of Negotiated ETA)	<b>Missed trips</b> (Arrival outside +/-15 min. of Negotiated ETA)	<b>Late Cancel /Missed Trip</b> (No arrival data)	<b>Total</b>
Number of trips	34	10	47	91
% of trips with arrival data	77%	23%	0%	100%
% of all late cancels, missed trips, and no shows	37%	11%	52%	100%

## On-Time Performance

Deducting the 91 trips that were not completed from the 1,725 trips dispatched results in 1,634 completed trips on the sampled day, or 77.2% of all 2,116 trips requested on February 9, 2005. Trip disposition code P represents trips performed.

For the 1,634 completed, or performed, passenger trips on the sample day, to identify on-time, early, and late pick-ups, the promised pick-up or drop-off time in column G (ETA Negotiated) was compared to the actual pick-up time in columns Q (COLLECT Actual Time) and BG (ARRIVE).

Column BG contained vehicle arrival time data for 934 (57%) of the 1634 completed pick-ups. All the records contained an actual collect time in column Q. On-time, early, and late pick-ups were calculated as follows.

- For completed trips with no vehicle arrival time listed, the difference between promised pick-up time and the actual “collect time” was calculated.
- For completed trips with both arrival time and actual collect time data, the difference between promised pick-up time and the earlier of arrival time or actual collect time was calculated.

As indicated in Table N.6, for the sample day, 77.8 percent of trips were picked up within 15 minutes of the scheduled time or on-time. 93.7 percent of trips were picked up either early or on-time, while 6.3 percent of trips were picked up late.

**Table N.6 – Calculated On-Time Performance: February 9, 2005**

	<b>On Time</b>	<b>Early</b>	<b>Late</b>	<b>Total</b>
<b>Number of Completed Trips</b>	1,271	260	103	1,634
<b>% of Completed Trips</b>	77.8%	15.9%	6.3%	100%

For early pick-ups, the concern is whether customers are pressured to accept early pick-ups by drivers or dispatchers. To the extent that customers find the early pick-ups convenient and have no objection, early pick-ups do not represent a constraint to use of the service. Table N.7 presents the distribution of early pick-ups from the beginning of the pick-up window. For example, “1-5 minutes early” is 16 to 20 minutes before the scheduled time and one to five minutes before the beginning of the -15/+15 pick-up window. As indicated in the table, 89.2 percent of the early pick-ups were within 15 minutes of the window. Pick-ups more than 15 minutes early could be considered untimely pick-ups if the time were not convenient for the customer.

**Table N.7 – Early Pick-ups**

	<b>1-5 minutes</b>	<b>6-15 minutes</b>	<b>16-30 minutes</b>	<b>&gt;30 minutes</b>	<b>Total</b>
<b>Number of early trips</b>	147	85	18	10	260
<b>% of early trips</b>	56.5%	32.7%	6.9%	3.9%	
<b>Cumulative % of early trips</b>	56.5%	89.2%	96.1%	100.0%	



With late pick-ups, the service and regulatory concern is whether or not there are a substantial number of significantly late pick-ups. Accordingly, late trips were reviewed to identify how late the pick-up was relative to the -15/+15 pick-up window.

As shown in Table N.8, 81.6 percent of late pick-ups on the sample day are within 30 minutes of the scheduled time and 15 minutes of the end of the -15/+15 pick-up window. Three pick-ups, or 0.2 percent of all trips, were more than 30 minutes late. These trips could be considered significantly late, but 3 trips of 1,634 trips do not appear to be a substantial number of significantly late trips.

**Table N.8 – Late Pick-ups**

	<b>1-5 minutes</b>	<b>6-15 minutes</b>	<b>16-30 minutes</b>	<b>&gt;30 minutes</b>	<b>Totals</b>
<b>Number of Late Trips</b>	45	39	16	3	103
<b>% of Late Trips</b>	43.7%	37.9%	15.5%	2.9%	
<b>Cumulative % of Late Trips</b>	43.7%	81.6%	97.1%	100%	
<b>% of Completed Trips</b>	2.8%	2.4%	1.0%	0.2%	6.4%

For the sample day, 93.7 percent of trips were performed early or on-time. Including trips with arrival times no more than five minutes after the pick-up window—as Metro does in its performance measurement—would result in early or on-time performance of 96.5 percent for the sample day. This is comparable to Metro’s reported on-time performance of 97 percent. An on-time performance rate of 95 percent equates to one late trip every two weeks for a traveler who makes one round trip 5 days a week. This is a relatively high level of on-time performance for an urban ADA complementary paratransit service.

**Drop-offs.** To retrieve corresponding drop-off data for the 1634 records of performed ADA pick-ups, the team went back to the original spreadsheet and matched the ID in Column E of the performed ADA pick-ups (Pickup/Drop-off code of “+” in column J) to records with the same ID in Column E with a PD (Pickup/Drop-off) code of “-” in column J.

To determine the number of on-time, early, and late drop-offs, the appointment time requested in column I (APPTIME requested) was compared to the arrival time in columns Q (COLLECT Actual Time) and BG (ARRIVE). This permitted calculation of the difference between scheduled and actual drop-off times and categorization of times by intervals within targeted ranges. The following data protocols impacted the data analysis of on-time, early, and late drop-offs:

1. Column Q (COLLECT time) contains a pick-up time when the PD (Pickup/Drop-off) code in column J is “+,” and a drop-off time when the PD (Pickup/Drop-off) code in column J is “-“.
2. 739 (45%) of the 1634 completed trip drop-offs contained appointment time requests in column I. This data formed the base for the analysis.

3. 173 (23%) of the 739 completed trip drop-offs with appointment time requests contained arrival time data in column BG. However, all the records contained an actual collect time in column Q.

We calculated on-time, early, and late drop-offs as follows:

- For completed trips with no arrival time listed, we calculated the difference between appointment time requested and the actual collect time.
- For completed trips with both arrival time and actual collect time data, we calculated the difference between appointment time requested and the earlier of arrival time or actual collect time.

Based on this analysis, of the 739 drop-offs, 617 (83.5 percent) were early or on-time, while 122 (16.5 percent) were late. Both early and late drop-offs were analyzed to identify the number of significantly early and significantly late drop-offs.

Table N.9 shows the distribution of early (before the appointment time) drop-offs. Of the 617 early drop-offs, 59.4 percent were on-time or less than 30 minutes early. Another 21.5 percent were 31 to 60 minutes early, and 2.6 percent were more than an hour early. The 19 trips more than an hour early are potentially a substantial number of trips that are significantly untimely. Drop-offs more than one hour early can result in customers left waiting on the sidewalk for the facility at their destination to open. Drop-offs more than an hour before appointments can be a constraint to use of the service by individuals who have disabilities.

**Table N.9 – Distribution of Early Drop-offs**

	<b>0-15 minutes</b>	<b>16-30 minutes</b>	<b>31-60 minutes</b>	<b>&gt;60 minutes</b>	<b>Total</b>
<b>Early Drop-Offs</b>	233	206	159	19	617
<b>% of Completed appointments</b>	31.5%	27.9%	21.5%	2.6%	83.5%
<b>Cumulative % of early drop-offs</b>	37.8%	71.2%	96.9%	100%	

Late drop-offs for appointments can cause the customer to miss medical appointments, or classes, or cause late arrivals for work. As shown in Table N.10, for all trips with appointments, 16.5 percent of the drop-offs were late. 4.6 percent were more than 15 minutes late and 2.4 percent more than 30 minutes late.

**Table N.10 – Distribution of Late Drop-offs**

	<b>1-15 minutes</b>	<b>16-30 minutes</b>	<b>31-60 minutes</b>	<b>&gt;60 minutes</b>	<b>Total</b>
<b>Late drop-offs</b>	88	16	17	1	122
<b>% of Completed appointments</b>	11.9%	2.2%	2.3%	0.1%	16.5%
<b>Cumulative % of late drop-offs</b>	72.1%	85.2%	99.2%	100%	