

**El Metro
City of Laredo, TX**

**El Lift Assessment
Technical Report**

**Prepared for Laredo Urban Transportation Study
by the Collaborative, Inc.**



**with
TranSystems Corporation
Cambridge Systematics, Inc.**

July 2013

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SUMMARY AND RECOMMENDATIONS

The Laredo Urban Transportation Study (LUTS) hired the Collaborative, Inc., of Boston, MA (the consultant) to assess the El Lift complementary paratransit service and to assist with the development of the City of Laredo's ADA Plan Update. This Technical Report presents the observations, data, analysis, and recommendations to achieve compliance with the United States Department of Transportation (DOT) ADA regulations, as well as to improve Laredo's paratransit service.

A separate document, the ADA Plan Update, contains information drawn from the Technical Report. The Plan Update documents the City's plans for achieving compliance with the DOT regulations for ADA complementary paratransit service.

The primary source of data for this report is information compiled by the consultant during a site visit to El Metro from October 21-26, 2012. El Metro staff provided additional information from fixed route and paratransit service data. The team interviewed El Lift riders and individuals who work with riders and other transit professionals. The team also consulted the US Census and the Federal Transit Administration's (FTA) National Transit Database (NTD).

LUTS and El Metro staff reviewed the draft Technical Report submitted to LUTS in January 2013. In response to the draft report, El Metro reported that it had updated certain policies and procedures. These reported updates are presented in underlined text throughout this report. The report is organized as follows:

Section	Title	Topics Covered
1	Overview	Tasks performed by consultant in this project
2	Background	Description of existing El Metro bus and paratransit (El Lift) service
3	ADA Complementary Paratransit Service Criteria	Minimum requirements for El Lift paratransit and how El Metro meets these requirements
4	Eligibility for El Lift	Process that El Metro uses to certify riders to become eligible for El Lift service
5	Telephone Access	How El Lift riders arrange for trips
6	Trip Reservations Process	How El Lift takes trip requests and schedules these trips
7	Service Performance	Evaluation of El Lift service, measured by on-time performance and other criteria
8	Resources	People, equipment, and budget used for El Lift service
9	Other Recommendations	

The Collaborative's recommendations are presented throughout the report and summarized in the following pages as short term (already completed or up to 6 months), medium term (up to 1 year), or long term (longer than 1 year). Each recommendation includes a cost value (low, medium, or high).

Chapter/Section/Recommendation	Time	Cost
Chapter 3 (ADA Complementary Paratransit Service Criteria)		
Section 3.2 (Type of Service)		
<ul style="list-style-type: none"> Revise written policy to clarify that El Lift’s base level of service as curb-to-curb, but also that drivers will provide additional assistance to riders, as needed, between their origin and destination. 	Short	Low
Section 3.7 (Trip Purpose)		
<ul style="list-style-type: none"> Create a written policy that there are no priorities for trip purpose for El Lift service. 	Short	Low
Section 3.9 (Complaint-Handling Process)		
<ul style="list-style-type: none"> To track the timeliness of resolving and responding to complaints, add a step to the complaint-response process in which customer service staff reports on how many complaints from the current year are resolved and how many are unresolved on each monthly report. 	Short	Low
Chapter 4 (Eligibility for El Lift)		
Section 4.2 (Eligibility Determination Process and Materials)		
<ul style="list-style-type: none"> If the Customer Service number is used as the number to call for ADA Paratransit Eligibility applications, have a caller option that would callers directly to the Eligibility Coordinator. 	Short	Low
El Metro has indicated that it has changed its telephone system to allow a caller to connect directly to the Eligibility Coordinator, and lists that telephone number.		
<ul style="list-style-type: none"> Allow applicants to provide medical verification from licensed medical professionals other than physicians. Encourage applicants to obtain disability verification from professionals most familiar with their most significant disability or health condition and provide this guidance in application materials. 	Short	Low
El Metro has indicated that it will continue to request certification from a medical doctor.		
<ul style="list-style-type: none"> Remove the question “Can the applicant ride a regular El Metro bus, or if needed, a wheelchair accessible El Metro bus?” from the current Disability Verification form. 	Short	Low
El Metro has indicated that it has removed this question from the Disability Verification form.		
<ul style="list-style-type: none"> Rather than asking medical professionals (who may not understand the accessibility of the fixed route service or even the exact functional abilities required to use it) to offer a summary opinion, it is better to simply get information about disability and functional ability and then use this information to make the decision. 	Short	Low
<ul style="list-style-type: none"> Collect additional information and include it in applicant spreadsheet to help document that El Metro has made determinations in a timely manner (21 days from the date of a completed application and completed interview, if required). The extra fields will also help document if an applicant was the cause of the delay. 	Short	Low
El Metro has indicated that it has begun to collect and record this information.		
<ul style="list-style-type: none"> Develop written procedures on exactly how El Metro will follow up with medical professionals. This ensures that efforts are consistent over time. 	Short	Low
El Metro has indicated that it has developed written procedures on how to follow up with medical professionals and that it has begun to send follow-up letters to applicants with incomplete applications.		
<ul style="list-style-type: none"> For applicants with in-person interviews, take photos for ID cards during the interview. 	Short	Low
El Metro has indicated that it takes a photograph of the applicant during the in-person interview.		

Chapter/Section/Recommendation	Time	Cost
Section 4.2 (Eligibility Determination Process and Materials) (continued)		
<ul style="list-style-type: none"> Include in eligibility determination letters: 1) information regarding whether riders can travel with personal attendants, 2) ID cards, and expiration date of eligibility. 	Short	Low
El Metro has indicated that it has updated the El Lift determination letter and ID card to indicate whether the individual is authorized to travel with personal attendants.		
<ul style="list-style-type: none"> For applicants found ineligible, include a detailed explanation for the decision in the letter, describing which pieces of information (e.g., answers to questions provided by applicants, professionals) were key in the decision and their right to an appeal. 	Short	Low
<ul style="list-style-type: none"> Revise the Rider's Guide to indicate that a determination of eligibility will be made within 21 calendar days of the receipt of a completed application (and the completion of an in-person interview, if required). Also, note that an applicant would be allowed to use the service until a decision is made, if it takes longer than 21 calendar days. 	Short	Low
El Metro has indicated that it has revised the Rider's Guide to state that an applicant would be allowed to use the service until a decision is made, if it takes longer than 21 calendar days.		
<ul style="list-style-type: none"> Consider granting conditional eligibility when appropriate. To do this, the eligibility determination process needs to be detailed enough to identify when, <i>and under what conditions</i>, individuals can use the bus. 	Medium	Medium
El Metro has indicated that it intends to implement conditional eligibility for El Lift.		
Section 4.3 (Appeal Process)		
<ul style="list-style-type: none"> Revise the Appeal Request form to not require that appellants provide an explanation of the reason they do not agree with the decision. The form should simply ask individuals to provide their name, address and phone number, and check a box indicating that they would like to arrange an in-person appeal. If El Metro elects to continue to ask for an explanation of why the appellant does not agree with the decision, this should be requested as <i>optional information</i>. Also, revise the Rider's Guide to indicate that an applicant has up to 60 days to request an appeal. 	Short	Low
El Metro has indicated that it is discussing these changes with its Paratransit Advisory Committee.		
<ul style="list-style-type: none"> Develop a full appeal process, including who will hear appeals. The full PAC should not hear appeals. Instead, develop a list of PAC members, as well as other members of the community with expertise on disability, to call on to hear appeals. Three individuals from this list can hear each appeal. Individuals should be selected based on the knowledge they have regarding the disability of the appellant. 	Medium	Low
El Metro has indicated that it is discussing these changes with its Paratransit Advisory Committee.		
Section 4.4 (Recertification)		
<ul style="list-style-type: none"> Begin generating lists of riders whose eligibility is scheduled to expire and notify these riders of the need to reapply. Consider extending the period of eligibility for riders whose disability is not temporary. Most transit systems provide eligibility for 3 or 4 years. 	Short	Low
El Metro has indicated that it has extended the period of eligibility for riders whose disability is not temporary from 2 years to 3-4 years.		
El Metro has indicated that it is mailing letters one month in advance to riders whose eligibility is scheduled to expire.		

Chapter/Section/Recommendation	Time	Cost
Section 4.5 (No-Show Suspension Policy)		
<ul style="list-style-type: none"> Revise the no-show policy to consider the frequency of no-shows as well as the absolute number. Before enforcing a suspension for 45 no-shows, look at the full rider trip history for the timeframe and determine the frequency of no-shows as well. Impose a suspension only if the 4–5 no shows amount to more than 15 percent of all trips scheduled and not cancelled in advance by the rider. In addition, revise policy to provide a two-stage appeals process. Before imposing any suspension, ensure that detailed documentation is available on any no-shows recorded. 	Short	Low
El Metro has indicated that it has revised its no-show policy and has sent letters to El Lift riders informing them of the policy.		
El Metro has indicated that El Lift agents are following new procedures to document their actions before declaring a rider no-show and recording their activities in the software system.		
Chapter 5 (Telephone Access)		
Section 5.2 (Phone Service Standards and Performance Monitoring)		
<ul style="list-style-type: none"> Develop a standard for telephone hold times. 	Medium	Low
Section 5.3 (Phone System Design)		
<ul style="list-style-type: none"> Consider upgrading to an automatic phone system with the ability to monitor and report on call statistics. 	Medium	Medium
Section 5.4 (Staffing)		
<ul style="list-style-type: none"> El Lift agents must accept trip requests on all days prior to a day when service is provided. This includes weekends and holidays if El Lift operates on the following day. 	Short	Low
El Metro has indicated that it has adjusted its staffing of El Lift agents, so that it is accepting trip requests 7 days a week from 8 a.m. to 5 p.m.		
Chapter 6 (Trip Reservation Process)		
Section 6.2 (Initial Trip Booking Process)		
<ul style="list-style-type: none"> El Lift agents should begin to enter all requested appointment/desired arrival times when booking trips. 	Short	Low
El Metro has indicated that its agents enter requested appointment times into the Trapeze scheduling software.		
<ul style="list-style-type: none"> Instruct agents to confirm and verify key trip information for all trip bookings. Develop a script for agents to follow to ensure that they consistently follow these procedures. 	Short	Low
El Metro has indicated that it has developed a script for El Lift agents to follow when they are accepting trip requests.		
<ul style="list-style-type: none"> Direct agents to present callers with more information about what it means to be a “will-call” for return trips. Each time a possible will-call is discussed, riders should be told that, if they opt to be “will-calls,” they might have to wait up to 2 hours for their return pickups. The option of conservatively estimating a return pickup time should be given to riders, e.g., one hour after they expect to be finished with their appointment. 	Short	Low
<ul style="list-style-type: none"> Consider revising policy to allow up to 2 hours to make a pickup for a will-call request. 	Short	Low
<ul style="list-style-type: none"> Consider limiting will-calls for certain medical offices, clinics, or facilities that have a record of keeping riders well past expected completion times. 	Short	Low
<ul style="list-style-type: none"> Enter will-call trips into the Trapeze system. 	Short	Low
El Metro has indicated that it has updated information that it provides to El Lift riders to explain that a will-call request might take up to one hour to respond to.		

Chapter/Section/Recommendation	Time	Cost
Section 6.2 (Initial Trip Booking Process) (continued)		
<ul style="list-style-type: none"> Carefully review the current settings of the Trapeze scheduling parameters before agents change their procedure for booking trips. 	Short	Low
<ul style="list-style-type: none"> Explore with Trapeze technical staff the option of searching for appropriate pickup times <i>based on the appointment times</i>, rather than on requested pickup times. 	Short	Low
<ul style="list-style-type: none"> Review the parameter settings in the scheduling system with Trapeze technical staff. 	Medium	Medium
El Metro has indicated that it will review parameter settings in its Trapeze scheduling software pending new software.		
<ul style="list-style-type: none"> To properly schedule based on appointment times, review and adjust other system parameters. In particular, the maximum travel time parameter settings have to be set correctly. 	Long	Medium
El Metro has indicated that it will review parameter settings in Trapeze pending new software.		
<ul style="list-style-type: none"> Work closely with Trapeze technical staff to set these parameters correctly before moving to scheduling trips based on appointment times. Test the new settings before making the changes for actual passenger service. After adjusting these settings with Trapeze's help, the reservations and scheduling process will be no more difficult for the agents, but the results will be better for the riders. 	Long	Medium
Chapter 7 (Service Performance)		
Section 7.1 (Scheduling Procedures and Staffing)		
<ul style="list-style-type: none"> It is strongly recommended that El Metro develop templates for subscription trips in the scheduling system. Revise template periodically. 	Medium	Low
El Metro has indicated that it will develop templates for subscription trips.		
<ul style="list-style-type: none"> Consider a number of parameter changes in the Trapeze software and review with Trapeze staff. 	Medium	Low
El Metro has indicated that it will review parameter settings in Trapeze pending new software.		
Section 7.2 (Radio Dispatch Staffing and Procedures)		
<ul style="list-style-type: none"> Periodically poll drivers (e.g., at least once per hour) to collect actual pickup and drop-off information and enter this information into the Trapeze system so that the system can keep estimated arrival times (ETAs) updated and show the actual status of runs throughout the day. In addition, this lead El Lift dispatcher should use the Trapeze Dispatch Screen to proactively dispatch. 	Short	Low
El Metro has indicated each driver manifest will include at least one time point. An El Lift agent will poll each driver daily. El Metro has also indicated that it will conduct hourly polling of drivers after the installation of new software and mobile data terminals.		
<ul style="list-style-type: none"> Whenever agents authorize a no-show, document actions taken and any contacts with riders in Tracker Notes. 	Short	Low
El Metro has indicated that El Lift agents are following new procedures to document their actions before declaring a rider no-show and recording their activities in the software system.		
<ul style="list-style-type: none"> Revise the policy to request that a rider who uses a personal attendant indicate on a trip-by-trip basis whether the attendant will be travelling with the rider. 	Short	Low

Chapter/Section/Recommendation	Time	Cost
Section 7.3 (No-Shows and Late Cancellations)		
<ul style="list-style-type: none"> Document no-shows using the “Trip Tracker Notes” feature in Trapeze. Documentation should include: when the vehicle arrived, and actions taken to contact the rider, any communications with the rider (or others), and the time the no-show was authorized. Instruct drivers to more consistently record both arrival and departure times for all pickups. 	Short	Low
El Metro has indicated that El Lift agents are following new procedures to document their actions before declaring a rider no-show and recording their activities in the software system.		
El Metro has indicated that it has issued a memo reminding drivers to record both arrival and departure times for all pickups.		
<ul style="list-style-type: none"> Revise the existing policy automatically cancelling return trips if a rider is a no-show for the initial trip. An agent should confirm that a rider does not want to take the subsequent trips for that day. Otherwise, assume that the rider would take the subsequent requested trips. 	Short	Low
El Metro has indicated that “El Lift will only honor subsequent trips if the customer calls [to confirm the subsequent trip] within two hours; a no-show will terminate the whole service schedule.” <i>Note: this practice is not compliant.</i>		
Section 7.4 (Trip Caps, Wait Lists, and Trip Denials)		
<ul style="list-style-type: none"> Once additional capacity is available to meet all trip requests, eliminate the use of a standby list. Until trip denials are eliminated, having a standby list is useful, since it reminds El Lift agents to try to schedule the trip later if possible. 	Short	Low
<ul style="list-style-type: none"> While the standby option is still in use, agents should make clear that riders will not get a call if the requested trip cannot be scheduled. Agents may also suggest that riders who opt to be standbys call the day before the day of service to check to see if their trips have been scheduled. 	Short	Low
El Metro has indicated that El Lift will not have a wait list.		
<ul style="list-style-type: none"> Revise current policy that limits riders to a maximum of four one-way trips per day. There should be no limit on the number of trips ADA paratransit eligible riders can request. 	Medium	Low
<ul style="list-style-type: none"> Because El Metro is not meeting all demand for El Lift service, increase El Lift capacity to eliminate trip denials and to allow riders to call 1 day in advance and still be guaranteed service. 	Long	Higher
Section 7.7 (On-Time Performance)		
<ul style="list-style-type: none"> Improve on-time performance for trips with requested drop-off times. Crucial to achieving this is recording the requested drop-off times and including these times on driver manifests, as well as the Trapeze dispatch screen. 	Short	Low
El Metro has indicated that it has issued a memo reminding drivers to record both arrival and departure times for all pickups.		
<ul style="list-style-type: none"> Adjust the parameters in Trapeze so that the reports for on-time performance—both pickups and drop-offs—reflect the correct on-time windows. 	Short	Medium
<ul style="list-style-type: none"> Monitor on-time performance on a regular basis. On-time performance is itself a key measure of service quality. It is also an indicator of other potential service issues. 	Long	Low
El Metro has indicated that the El Lift manager will “screen incoming manifests to provide immediate feedback to drivers.”		
<ul style="list-style-type: none"> For trips with a requested drop-off time, set an on-time drop-off window from 30 minutes before the requested time to 0 minutes (-30/0). 	Medium	Low

Chapter/Section/Recommendation	Time	Cost
Section 7.7 (On-Time Performance) (continued)		
<ul style="list-style-type: none"> Establish a standard for an acceptable proportion of “long trips” for El Lift service. 	Short	Low
<ul style="list-style-type: none"> Regularly monitor the proportion of long trips and conduct an analysis comparing El Lift travel times to travel times of comparable fixed route trips. 	Medium	Medium
Chapter 8 (Resources)		
Section 8.5 (Other Resources)		
<ul style="list-style-type: none"> Provide fixed route road supervisors the authority to monitor both fixed route and El Lift services. 	Short	Low
Section 8.7 (Addressing Unmet Demand)		
<ul style="list-style-type: none"> Introduce conditional eligibility to manage the demand for complementary paratransit service. 	Medium	Medium
<ul style="list-style-type: none"> Increase the current El Lift fare to \$1.50. At present, the El Lift fare is \$1, which is lower than the El Metro base fare of \$1.50. The DOT ADA Regulations allow transit systems to charge twice the fixed route fare. 	Medium	Medium
Chapter 9 (Additional Recommendation)		
Section 9.1 (Greater Fixed Route Accessibility)		
<ul style="list-style-type: none"> Analyze the current trip patterns of El Lift riders to identify and share with planners and engineers the sidewalk and bus stop improvements that would permit El Lift riders (with mobility disabilities) to access El Metro for some trips. Such targeted investments, in conjunction with implementation of conditional eligibility, can yield operating cost savings over time. 	Medium	Higher
Section 9.3 (Working with Other Transportation Providers)		
<ul style="list-style-type: none"> Investigate the potential benefits of coordinating El Lift service with the County’s El Aguila paratransit service. 	Short	Low
<ul style="list-style-type: none"> Investigate contracting with private taxi companies to provide a portion of El Lift service. 	Medium	Medium

1 OVERVIEW

This Technical Report presents the observations, data collected, and analysis of the Collaborative, Inc. team (the team) used to develop the 2013 ADA Paratransit Plan Update for El Metro. The information in this document forms the basis of the findings and recommendations included in the ADA Plan Update for El Metro's ADA complementary paratransit service.

The primary source of data for this report is information compiled by the team during a site visit to El Metro from October 21-26, 2012. El Metro staff provided additional information from fixed route and paratransit service data. The team interviewed El Lift riders and individuals who work with riders and other transit professionals. The team also consulted the US Census and the Federal Transit Administration's (FTA) National Transit Database (NTD).

LUTS and El Metro staff reviewed the draft Technical Report submitted to LUTS in January 2013. In response to the draft report, El Metro reported that it had updated certain policies and procedures. These reported updates are indicated throughout this report with underline.

The remaining sections of this Technical Report include:

- Section 2 Background
- Section 3 ADA Complementary Paratransit Service Criteria
- Section 4 Eligibility for El Lift
- Section 5 Telephone Access
- Section 6 Trip Reservations Process
- Section 7 Service Performance
- Section 8 Resources
- Section 9 Other Recommendations

1.1 INITIAL VISIT

The Collaborative's Project Manager visited Laredo on September 10, 2012 to consult with El Metro managers and the LUTS project manager, review the project schedule, and to collect information about El Metro and El Lift policies and services. He also interviewed the El Metro planner, recently assigned to oversee the eligibility determination process for El Lift, visited the El Metro operations facility, met the El Lift agents, and observed afternoon trip requests, scheduling, and vehicle dispatching. Please see Appendix A for a full schedule of activities.

1.2 PRE-ON-SITE VISIT ACTIVITIES

Following the September 2012 visit, the team requested items that team members needed to review in advance of their site visit in October. El Metro provided the information on October 5, 2012.

The team reviewed the information, which included:

- Description of El Lift service
- Operator handbook and Rider's Guide
- Service standards for El Lift
- Samples of completed driver manifests
- Monthly operating statistics
- Annual budget information
- Complaints related to El Lift service

The team prepared a schedule of activities for its site visit, including a public meeting to discuss its work and the preparation of the ADA Plan Update.

1.3 SITE VISIT

The team conducted a site visit of El Lift from October 22-26, 2012. Appendix B presents the list of technical areas and activities covered by the team during the site visit. The site visit began with an opening meeting on Monday morning, October 22. Attendees included:

Vanessa Guerra	LUTS, Transportation Planner III
Eddie Bernal	El Metro, Assistant General Manager, Administration and Finance
Joe Jackson	El Metro, Assistant General Manager, Operations
Oscar Gomez	El Metro, Transit Planning Coordinator
David Chia	the Collaborative (Project Manager)
Jim Purdy	the Collaborative
Russell Thatcher	Transsystems Corp.
Caroline Leary	Cambridge Systematics

As presented in Appendix B, the team interviewed El Lift managers and staff, observed operations, analyzed data, and collected additional information. They worked at both the El Metro administrative offices at 1301 Farragut and the operations center at 401 Scott. In addition, the team led a Public Meeting on Tuesday, October 23, 2012 at 1301 Farragut. The Project Manager made a presentation (see Appendix C). This was followed by comments and questions from individuals who attended the Public Meeting: El Lift riders, caretakers, and individuals who work with El Lift riders.

The team held a debriefing with LUTS and El Metro on Friday morning, October 26. Attendees included:

Vanessa Guerra	LUTS, Transportation Planner III
Mark Pritchard	El Metro, General Manager
Eddie Bernal	El Metro, Assistant General Manager, Administration and Finance
Joe Jackson	El Metro, Assistant General Manager, Operations
Danny Gonzalez	El Metro, Supervisor, El Lift
Oscar Gomez	El Metro, Transit Planning Coordinator
David Chia	the Collaborative (Project Manager)
Jim Purdy	the Collaborative
Russell Thatcher	Transsystems Corp.
Caroline Ferris	Transsystems Corp.

The team discussed its observations during the site visit and presented their analysis and preliminary recommendations for improving El Lift service. The team also discussed the timetable for the remaining activities leading to the Final Technical Report and ADA Plan Update.

2 BACKGROUND

Laredo is located on the north bank of the Rio Grande, approximately 160 miles south-southwest of San Antonio. According to 2011 US Census estimates, its population was 241,935; this compares to 184,821 in July 2001, an increase of 30.9 percent over 10 years. Laredo is the tenth most populous city in Texas and is the county seat of Webb County, which had a population (US Census) in 2011 of 256,496. Laredo has an area of 79 square miles and is part of the larger Laredo-Nuevo Laredo Metropolitan Area, which has with an estimated population of 636,516.

According to the 2010 US Census, 7.8 percent of the population was 65 years or older. The median family income was \$32,577 and 29.2 percent of families were below the poverty line.

The City of Laredo operates El Metro, public fixed route bus service. The El Metro board consists of nine members (the mayor and the eight city councilors). The general manager and two assistant general managers are hired via a management contract with a private transportation company, First Transit. The remainder of the El

Metro staff, including drivers, mechanics, and office staff, are employees of Laredo Transit Management, Inc., a private company whose sole business activity is operating El Metro. At the time of the development of this plan, a Laredo Transit Management, Inc. employee was acting as one of the two assistant general managers.

El Metro has its administrative offices at 1301 Farragut Street in downtown Laredo. This facility also is the transit center where all bus routes terminate. It has an indoor passenger waiting area and information center. The facility also houses the intercity bus terminal, public parking, and other city agencies. El Metro’s operations center is at 401 Scott Street. This facility provides parking for all El Metro vehicles, vehicle maintenance, dispatch, training, and driver space. All activities (other than eligibility determination) for El Lift paratransit service also take place at 401 Scott Street.

2.1 FIXED ROUTE SERVICE

El Metro operates fixed route bus service for the City of Laredo. There are 22 routes, two of which (Routes 12A and 12B) are Express Routes (a portion of these routes run in I-35). All routes begin or end at El Metro’s Transit Center located at 1301 Farragut Street in downtown Laredo. The routes are listed in Table 2.1.

Table 2.1 – El Metro Bus Routes

Route	Areas Served
1	Santa Maria Santa Maria - Mall del Norte - Target Store #1
2A	San Bernardo Mall del Norte - Social Security Office
2B	San Bernardo Park & Ride - Calton
3	Convent Laredo Medical Center - Doctor’s Hospital
4	Springfield Target Springfield - Retama - Target Store #1
5	Tilden Tilden - Gateway Community Health Center - Public Library
6	Cedar Cedar - Casa Blanca Clinic
7	LCC LCC - San Francisco Javier
8A	Guadalupe/Lane Corpus Christi - Texas Workforce
8B	Guadalupe Villa Del Sol Tilden - Cheyenne Subdivision
9	Market Market - New York/Lomas del Sur
10	Corpus Christi Meadow - Zacatecas/Bartlett
11	Gustavus/LEC Gustavus - Clark - Laredo Entertainment Center
12A	Del Mar Express Mall del Norte - International
12B	Shiloh Express Mall del Norte - Shiloh - International
13	Heritage Park Gustavus - Clark - Heritage Park
14	Santa Rosa LCC South Campus - Santa Rita
15	Main/Riverside Main - Riverside/Calton
16	TAMIU Texas A & M University
17	Mines Road Mall del Norte - Rancho Viejo
19	Santo Nino Concord Hills - Larga Vista
20	Los Angeles Zapata Highway - Los Angeles

SCHEDULES

El Metro service operates 7 days a week. In general, service is available from 6 a.m. to 10 p.m. on Monday to Saturday and 7 a.m. to 8:30 p.m. on Sunday. Table 2.2 presents the hours for each bus route.

Table 2.2 – Fixed Route Bus Hours of Service

Route		Monday-Saturday		Sunday	
		[Saturday only]			
1	Santa Maria	6:25 a.m.	9:55 p.m.	8:35 a.m.	8:22 p.m.
2A	San Bernardo	6:00 a.m.	9:55 p.m.	7:30 a.m.	8:25 p.m.
2B	San Bernardo	6:15 a.m.	9:40 p.m.	8:00 a.m.	6:55 p.m.
3	Convent	6:30 a.m.	10:20 p.m.	8:30 a.m.	8:20 p.m.
4	Springfield Target	6:05 a.m.	9:37 p.m.	8:35 a.m.	8:22 p.m.
5	Tilden	6:00 a.m.	9:40 p.m.	8:20 a.m.	8:30 p.m.
6	Cedar	6:30 a.m.	8:25 p.m.	9:30 a.m.	7:55 p.m.
7	LCC	6:45 a.m.	9:10 p.m.	7:45 a.m.	7:40 p.m.
8A	Guadalupe/Lane	7:00 a.m.	8:55 p.m.	8:45 a.m.	6:35 p.m.
8B	Guadalupe Villa Del Sol	7:30 a.m.	7:05 p.m.	[No service]	
9	Market	6:30 a.m.	9:25 p.m.	7:15 a.m.	8:35 p.m.
10	Corpus Christi	6:30 a.m.	9:55 p.m.	8:00 a.m.	8:25 p.m.
11	Gustavus/LEC	7:00 a.m.	9:45 p.m.	7:40 a.m.	6:50 p.m.
12A	Del Mar Express	7:30 a.m.	7:55 p.m.	11:15 a.m.	7:55 p.m.
12B	Shiloh Express	7:00 a.m. [8:15 a.m.]	7:25 p.m. 6:10 p.m.]	[No service]	
13	Heritage Park	7:00 a.m.	6:50 p.m.	7:40 a.m.	6:50 p.m.
14	Santa Rosa	6:15 a.m.	9:55 p.m.	7:00 a.m.	8:25 p.m.
15	Main/Riverside	6:30 a.m.	8:55 p.m.	11:00 a.m.	5:55 p.m.
16	TAMIU	7:00 a.m. [7:00. a.m.]	9:55 p.m. 7:25 p.m.]	12:00 p.m.	6:55 p.m.
17	Mines Road	7:00 a.m.	8:40 p.m.	12:00 p.m.	7:25 p.m.
19	Santo Nino	6:25 a.m.	8:55 p.m.	11:05 a.m.	7:10 p.m.
20	Los Angeles	6:15 a.m.	9:05 p.m.	7:00 a.m.	8:25 p.m.

As presented in Table 2.3, service varies on certain holidays.

Table 2.3 – Holiday Schedule

Holiday	Service Schedule
Martin Luther King Jr. Day Presidents' Day Memorial Day Labor Day Veteran's Day Christmas Eve New Year's Eve	Monday-Saturday
Independence Day New Year's Day	Sunday
Thanksgiving Christmas Day	No Service

FARES

Table 2.4 presents the fare structure for El Metro's fixed route service. Passengers may pay with cash, including dollar bills, in exact change. El Metro offers stored value fare cards up to \$20. There are no unlimited ride passes for a week or month. For senior citizens and persons with disabilities, peak fares apply on weekdays from 6 to 9 a.m. and 3 to 6 p.m.

Table 2.4 – El Metro Fixed Route Fares

Category	Fare
Adults	\$1.50
Children (5 to 11 years)	\$0.50
Children (less than 5 years)	Free
Students (with valid ID)	\$1.25
Senior Citizens/ Persons with disability	\$0.35/\$0.25 (peak/off-peak)
Medicare Cardholder	\$0.75
Transfers	\$0.25

RIDERSHIP AND OPERATIONS

Table 2.5 provides a summary of El Metro’s fixed route operating data from Fiscal Years 2007 to 2011 (October 1 to September 30). Annual ridership decreased significantly in 2009 and 2010 and continued to decrease in 2011. Overall, ridership during this 5-year period dropped by 27.2 percent: from 4.32 million to 3.15 million annual unlinked bus trips.

Table 2.5 -- El Metro Fixed Route Operating Data, Fiscal Years 2007-2011

	2007	2008	2009	2010	2011
Ridership	4,324,395	4,358,456	3,987,845	3,365,703	3,149,631
Vehicle revenue hours	161,557	147,618	149,253	150,323	150,915
Passenger/ revenue hour	26.77	29.53	26.72	22.39	20.87
Vehicle revenue miles	1,716,113	1,645,217	1,667,833	1,739,286	1,721,457
Passengers/revenue mile	2.52	2.65	2.39	1.94	1.83
Peak Revenue Vehicles	34	34	35	35	35
Total Fixed Route Vehicles	49	49	49	49	49
% Accessible Vehicles	100	100	100	100	100
Operating Costs	\$10,827,138	\$10,984,970	\$10,533,594	\$10,753,039	\$10,440,404

Source: National Transit Database, 2011

Operating productivity over the 5 years, measured by passengers per revenue hour, was highest in 2008 at 29.53 and lowest at 20.87 in 2011.

Annual vehicle revenue hours declined 6.6 percent over the 5-year period, with an 8.63 percent decrease from 2007 and 2008 and slight increases in each of the next 3 years.

The number of peak revenue vehicles remained essentially the same, with the addition of one vehicle in 2008; the total number of available vehicles remained the same over the 5-year period. Appendix D includes a list of all fixed route vehicles.

Operating costs remained nearly flat over the 5 years, from \$10.83 million in 2007 to \$10.44 million in 2011. However, because ridership has decreased, the operating cost per trip increased from \$2.50 to \$3.31.

2.2 ADA COMPLEMENTARY PARATRANSIT SERVICE

The following paragraphs summarize the service policies for El Lift paratransit service, as described in the “Paratransit Service Rider’s Guide” or the El Lift page on the El Metro website. Further discussion and evaluation with respect to the DOT regulations appears in Section 3 of this Technical Memo.

TYPE OF SERVICE

As set forth in the El Metro website:

The El Lift Paratransit Service provides shared, origin to destination public transportation to people with disabilities who are unable to use El Metro's fixed route buses. Paratransit services are a shared-ride service operated with modern, accessible vehicles. Riders who are unable to access vans using steps may use wheel chair lifts.

ELIGIBILITY

According to the website:

Persons within the city limits of Laredo who are unable because of their disability, to use fixed-route buses and have been verified as eligible by a personnel or designated representative of a qualified social service agency. El Metro will make final eligibility determination.

Further, the Rider's Guide states:

Eligible paratransit program participants may be certified for services for a maximum period not to exceed two (2) years. The eligibility period will depend on the paratransit participant's specific disability and duration of disability (if temporary). Eligibility for EL LIFT Paratransit Services may be on a "conditional" basis, meaning service will only be provided for those trips in which ADA paratransit eligibility standards have been met.

SERVICE AREA

The "Rider's Guide" states "Paratransit service will be provided only within the service area. The extent of this service area is a width of 3/4 of a mile on either side of any El Metro fixed route."

DAYS AND HOURS OF SERVICE

For Monday to Saturday, the El Lift service hours are stated as 6 a.m. to 10 p.m. On Sunday, the Rider's Guide says that El Lift service hours are 7 a.m. to 8:30 p.m. However, the website says that Sunday service hours are 7 a.m. to 9:30 p.m.

RESPONSE TIME

El Metro's stated policy is that El Lift agents accept trip requests 7 days a week from 8 a.m. to 5 p.m. According to the Rider's Guide, "Reservations may be made from one day before or up to seven days in advance."

FARES

The fare is \$1.00 per trip. Guests also pay \$1.00. Personal Care Attendants (PCAs) may ride for free.

TRIP PURPOSE

El Metro does not have a written policy concerning trip purpose for El Lift service. However, the Rider's Guide acknowledges that the US DOT ADA regulations require that ADA paratransit service must provide trips for any trip purpose.

2.3 ADA COMPLEMENTARY PARATRANSIT PERFORMANCE POLICIES AND STANDARDS

El Metro has established the following policies and standards for El Lift service.

DENIALS

El Metro does not a standard for trip denials. While the El Lift staff tries to schedule all requests for El Lift service, there have been trip denials each month on an ongoing basis.

TRIP CANCELLATIONS AND NO-SHOWS

According to the Rider's Guide:

A No-Show occurs when you fail to board the paratransit vehicle within five (5) minutes after it arrives within the ready-time window, a Late Cancellation occurs when you fail to cancel your trip at least two (2) hours before the ready-time window. Canceling your trip when the operator arrives is considered a Cancel at the Door.

“Ready window” is the 30-minute period when the El Lift vehicle is scheduled to arrive; also commonly called the pickup window

MISSED TRIPS

El Metro does not have a definition or standard for a missed trip.

ON-TIME PERFORMANCE

The stated on-time pickup window for El Lift service is 15 minutes before to 15 minutes after the negotiated pickup time (-15/+15). El Metro has no standard for acceptable portion of pickups that take place in this window. At the time of the team's site visit, El Metro had not been monitoring pickup performance.

El Metro does not have a standard for drop-off performance. There is no pickup window and, at the time of the team's site visit, El Metro had not been monitoring drop-off performance.

ON-BOARD TRAVEL TIME

El Metro managers say that the goal for maximum travel time for El Lift service is 60 minutes. El Metro has no standard for acceptable portion of trips that exceed 60 minutes. At the time of the team's site visit, El Metro had not been actively monitoring travel time.

TELEPHONE STANDARDS

Currently, there are no standards for telephone hold times. El Lift's telephone system does not have the ability to measure hold times.

COMPLAINT HANDLING

El Metro's customer service department receives and responds to rider comments and complaints for both fixed route bus service and El Lift paratransit service. It keeps written documentation of the resolution and response to the complainant. It does not have a standard for how quickly it should respond to the complainant.

3 ADA COMPLEMENTARY PARATRANSIT SERVICE CRITERIA

This section presents information about the compliance of El Metro’s ADA complementary paratransit service policies with the regulatory criteria for each of the following areas:

- Type of service
- Service area and days and hours of operation
- Fares
- Trip purposes
- Coordination with adjoining transit systems

This chapter also examines the process used by El Metro to receive, investigate, and respond to comments and complaints from ADA complementary paratransit service riders.

3.1 CONSUMER INPUT

One El Lift rider complained that a driver refused to pick her up because she had three grocery bags. The Rider’s Guide states:

Carry-on packages are limited to two (2) grocery bags or similar- sized packages on board the paratransit vehicles. Operators are not allowed to assist the rider carrying the packages to and from the same sidewalk or waiting area where the rider boards.

This is an acceptable policy if El Metro has a comparable policy for its fixed route bus service.

3.2 TYPE OF SERVICE

According to the “El Metro Paratransit Service Rider’s Guide (Rider’s Guide), “El Lift Paratransit Services provides shared, curb-to-curb (not door to door) public transportation to people with disabilities who are unable to use El Metro’s fixed route buses.” In practice, some El Lift drivers offer assistance to and from the vehicle to the rider’s home and destination.

Recommendation: revise the written policy to clarify that El Lift’s base level of service is curb-to-curb, but also that drivers will provide additional assistance to riders, as needed, between their origin and destination.

3.3 SERVICE AREA

The DOT ADA regulations require a transit agency operating fixed route bus service to provide complementary paratransit service that covers, at a minimum, all areas within 3/4-mile of all of its bus routes, along with any small areas within its core service area that may be more than 3/4-mile from a bus route, but that are otherwise surrounded by served corridors (49 CFR § 37.131(a)(1)). The service area for ADA complementary paratransit service must include areas outside of the defined fixed route jurisdiction—such as beyond political boundaries or taxing jurisdictions—that are within 3/4-mile of the transit agency’s fixed route, unless the public transit agency does not have the legal authority to operate in those areas.

El Metro’s official policy is to provide El Lift paratransit service within 3/4-mile of all fixed route service. In practice, the El Lift serves the entire City of Laredo. El Metro bus routes (and their respective 3/4-mile “polygons”) are not programmed into the Trapeze paratransit software; instead, El Lift agents rely on their knowledge of the area when booking trips to ensure that trip origins and destinations are within 3/4-mile of bus routes. Approximately 95 percent of current El Lift origins and destinations fall within the 3/4-mile of El Metro bus routes, based on a review of a sample of completed trips.

3.4 DAYS AND HOURS OF SERVICE

The DOT ADA regulations require that the ADA complementary paratransit service be available during the same hours and days as the agency's fixed route service (49 CFR § 37.131(e)). This requirement applies on a route-by-route basis. For example, an area that has fixed route bus service on weekdays but not weekends must have ADA complementary paratransit service (provide trips) on weekdays and is not required to provide service on weekends; an area that has bus service from 5 a.m. until 9 p.m. must have ADA complementary paratransit service, at minimum, from 5 a.m. and 9 p.m.

According to the Rider's Guide, service hours are Monday through Saturday from 6 a.m. to 10 p.m. and 7:30 a.m. to 9:30 p.m. on Sundays. El Lift agents schedule the latest pickup up to 1 hour before the end of service. On the other hand, El Lift has been providing pickups on weekdays as early as 4:30 a.m. to accommodate riders going to early morning dialysis treatment. While these trips are not required by the ADA regulations, El Metro has chosen to provide service beyond the minimum requirements.

3.5 RESPONSE TIME

The DOT ADA regulations require that riders be able to request trips on the day before the trips. The transit system must accept trip requests during "all business hours," even if that day is a weekend or holiday (49 CFR § 37.131(b)). According to the Rider's Guide, a rider may request a trip "between 9 a.m. and 5 p.m., Monday thru Sunday. Reservations may be from one day before or up to seven (7) days in advance." At the time of the team's site visit, El Lift agents did not accept trip requests on Saturday or Sunday, as well as on certain holidays. El Lift has indicated that El Lift accepts trip requests on all days prior to a day of service. Furthermore, agents strongly encourage riders to make requests 7 days in advance.

3.6 FARES

The DOT ADA regulations allow a fare for each ADA complementary paratransit service trip that is up to twice that charged for the base fare on fixed route service for the same origin and destination at the same day and time (49 CFR § 37.131(c)).

The fare for a one-way trip on all fixed routes at the time of the site visit was \$1.50. The fare for El Lift may therefore be as high as \$3. The fare for an ADA complementary paratransit service trip is \$1, less than the fixed route fare. Personal care attendants (PCAs) who accompany a certified rider do not pay a fare. Companions who accompany a certified rider also pay a \$1 fare. The ADA complementary paratransit fare complies with the DOT ADA regulations.

3.7 TRIP PURPOSE

El Metro provides El Lift service without regard to trip purpose. There is no written policy concerning trip purpose. However, the Rider's Guide acknowledges that the US DOT ADA regulations require that ADA paratransit service must provide trips for any trip purpose (49 CFR § 37.131(d)).

Recommendation: create a written policy that there are no priorities for trip purpose for El Lift service.

3.8 COORDINATION WITH ADJACENT SERVICE PROVIDERS

As an outgrowth of the coordination requirements in Section 37.139(g) of the DOT ADA regulations, transit systems are required to continue to coordinate with transit systems with overlapping or contiguous service areas for paratransit riders who want to travel between service areas.

Webb County operates both general public fixed route bus service and paratransit service through the Community Action Agency. "El Aguila" service is targeted to individuals who live in the non-urbanized portion of Webb County. According to the County's website, there are six fixed routes that cover most of the rural areas of the Webb County. Service is available on Monday to Saturday from 5:45 a.m. to 8 p.m. and Sunday from 7:30 a.m. to 6:45 p.m. The one-way fare is \$1.25. The discounted fare for seniors is 50 cents.

El Aguila’s demand responsive service is intended to be the ADA complementary paratransit service for its fixed routes. Service is available on weekdays only, 7 a.m. to 5 p.m. The level of service is “curb to curb.” The one-way fare is 75 cents.

Currently, El Metro does not coordinate its fixed route or paratransit service with the County’s service.

3.9 COMPLAINT-HANDLING PROCESS

The ADA regulations surrounding customer complaints require that transit agencies accept complaints from riders, keep copies of these complaints for 1 year, and keep a complaint summary on file for 5 years (49 CFR 27.121 (b)). The team determined that El Metro is in compliance with these regulations.

The team gathered information about this process through an interview with El Metro’s Customer Service Coordinator and through conversations with the El Lift Supervisor. The Customer Service Coordinator provided the team with all complaints received about El Lift service for January to September 2012, as well as all complaints received about El Metro’s fixed route service for the same time period. The purpose of reviewing the fixed route comments was to seek complaints such as non-functioning wheelchair lifts that might impede the use of this service for those with disabilities.

COMPLAINT POLICIES AND PROCEDURES

El Metro receives complaints primarily by phone, in person, and via e-mail. Instructions on how to file a complaint are included in Section 15 of the Rider’s Guide. In the case of an in-person meeting, the rider either writes his/her comment on a paper form provided by El Metro or the customer service agent transcribes the complaint during the meeting (see Appendix E for the Customer Service form). The agent provides a copy of a complaint to the rider upon request and forwards a written copy to the El Lift supervisor. After the supervisor responds to the agent with a resolution, the agent communicates the response to the complainant.

El Metro’s customer service department maintains paper copies of all complaints and resolutions on file indefinitely. The complaints are organized in file folders, categorized by department in chronological order, and stored in El Metro’s customer service office. Additionally, the customer service staff prepares monthly summaries of complaints and their resolutions, also categorized by department.

El Metro must accommodate its ridership with respect to language. Spanish is the primary language for many passengers and therefore they provide their comments in Spanish. El Metro logs complaints in the language in which they were given, rather than translating them into English (in the case of comments submitted in Spanish) to ensure the complaints are logged verbatim and nothing is lost or misrepresented in translation.

ANALYSIS OF EL LIFT COMPLAINTS

The team analyzed 17 complaints about El Lift service and grouped them into categories. Additionally, there were three complaints about the fixed route service related to service accessibility. Figure 3.1 organizes all 20 complaints by type: Driver Missed Trip, Employee Rudeness, Passenger Wait Times, Policy Question, and Reservations.

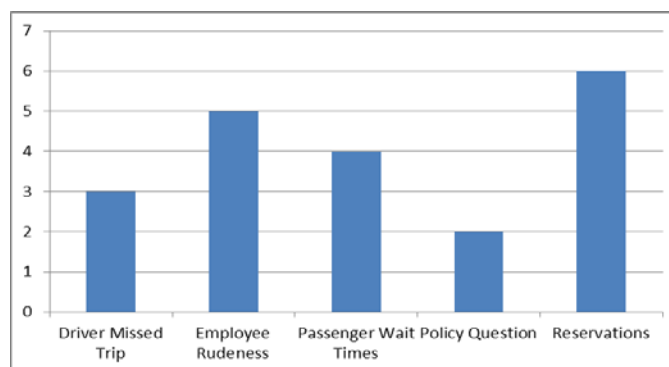


Figure 3-1 Complaints by Type

Table 3.1 describes the categories of complaints.

Table 3.1 -- Complaint Definitions

Complaint	Definition
Driver Missed Trip	El Lift driver failed to pick up a passenger.
Employee Rudeness	El Lift driver or El Metro bus driver was rude to a rider. This also includes 3 complaints about drivers who said that the wheelchair lift (on a fixed route bus) was not working.
Passenger Wait Times	Passenger waited a long time for El Lift for a pickup.
Policy Question	Complaints related to an issue with an El Lift policy or a violation of a policy (such as limit on number of grocery bags in vehicle or a passenger not wearing a seatbelt).
Reservations	Complaints related to issues related to making reservations (e.g., audibility problem, long wait before agent answered phone, scheduling mistake).

Two of the Employee Rudeness complaints relate to two separate incidents involving the same bus driver and passenger. The passenger complained that the bus driver was rude and claimed that the wheelchair lift was broken. The third Employee Rudeness complaint related to a driver’s making discriminatory comments about weight and size of a passenger as the driver helped secure the wheelchair straps.

For the two comments related to El Lift policies: one involved seatbelts and one involved the number of shopping bags that a passenger may bring on El Lift.

Recommendation: To track the timeliness of resolving and responding to complaints, add a step to El Metro’s complaint response process in which the customer service staff reports on how many complaints from the current year are resolved and how many are unresolved on each monthly report.

4 ELIGIBILITY FOR EL LIFT

The team examined the process used to determine ADA complementary paratransit eligibility to ensure that determinations are being made in accordance with the regulatory criteria and in a way that accurately reflects the functional ability of applicants. The timeliness of the processing of requests for eligibility was also assessed. The policy and practice regarding suspension of eligibility for excessive no-shows was also examined. Team activities included the following:

- Interviews with riders and advocates and a review of rider comments on file at El Metro
- Review of eligibility materials and interviews of eligibility determination staff
- Review of eligibility determination outcome statistics
- Review of application files of 20 recent applicants who had been granted eligibility or who had been denied ADA complementary paratransit eligibility
- Review of no-show policy and procedures

4.1 RIDER COMMENTS

During interviews with and the October 2012 public hearing, riders and advocates had the following comments related to the El Lift eligibility process:

- Professional other than physicians—such as social workers—should be able to fill out the portion of the application form
- Riders should be able to receive service immediately
- Riders do not receive adequate notice of their expiring eligibility; El Lift does not call to remind riders
- New simpler application is an improvement

- New El Metro staff overseeing eligibility is working to improve process
- Other transit systems (e.g., Houston, San Antonio) do not offer visitor eligibility to riders with El Lift eligibility

4.2 ELIGIBILITY DETERMINATION PROCESS AND MATERIALS

Individuals are instructed in public information to call the El Metro Customer Service Office (956-795-2280) weekdays from 8 a.m. to 5 p.m. to request that an application form be mailed to them. Individuals can also pick up application forms in person at the Laredo Transit Center at 1301 Farragut, at the El Lift Operations Center at 401 Scott Street, or at one of three City office locations. Finally, individuals can download a copy of the application forms from the El Metro website.

When calling the Customer Service Office, several call routing options are presented. One option is to press “2” for the “Lift Department.” When “2” is pressed, there is a recording that directs callers to hang up and call 956-795-2290, which is the telephone number for the El Lift reservations office. If a caller dials this reservations number, it is likely that the El Lift agents tell them to call Customer Service. The only way to have Customer Service transfer a call to the Eligibility Coordinator is to press “0” for an operator and then specifically indicate that the call is about getting an El Lift application form. If one only mentions El Lift service in general, it is possible that even the operator might transfer callers to the reservations number.

Recommendations: If the Customer Service Office number is used as the number to call for ADA Paratransit Eligibility applications, El Metro should have a caller option that would send them directly to the Eligibility Coordinator. One way to do that would be to have a second menu for callers who press “2” for “El Lift.” The second menu could state:

To request an application for El Lift service, or for information about the application process, press ‘1’.
To reach the El Lift operations center to request a trip or to check on a ride, press ‘2.’

El Metro could simply list the Eligibility Coordinator’s direct number as the number to call to get an application or for information about the eligibility process.

El Metro has indicated that it has changed its telephone system to allow a caller to connect directly to the Eligibility Coordinator, and lists that telephone number.

An individual interested in applying for ADA complementary paratransit eligibility must complete the seven-page “Application for Certification of ADA Paratransit Eligibility” form. He/she must also have a five-page “Disability Verification for Demand Responsive Transportation” form completed by a licensed physician and must submit this disability verification form as part of the application for certification. Appendix F presents copies of these forms.

Recommendations: El Metro should allow applicants to provide medical verification from licensed medical professionals other than physicians. Research and reports on ADA paratransit eligibility suggest that licensed physicians often are not the appropriate professionals for providing information about functional ability. They may be able to provide diagnosis, but may not be working with applicants on treatments related to functional abilities. Other professionals working with applicants, such as rehabilitation specialists, skilled nurses, clinical social workers, physician or occupational therapists, orientation and mobility specialists, independent living specialists, and licensed social workers may be better able to provide the kind of functional ability information needed to make an eligibility determination. Some applicants also may not be regularly seeing a licensed physician.

While allowing a broader array of professionals, El Metro should also encourage applicants to obtain disability verification from professionals most familiar with their most significant disability or health condition. This guidance should be provided in the application materials.

El Metro has indicated that it will continue to request certification from a medical doctor.

If individuals call to request an application form, the El Metro ADA Eligibility Coordinator (who is also the planner) provides general information about ADA paratransit eligibility to help ensure that people have a correct

understanding of the program. He explains that ADA paratransit eligibility is based on an inability to use the El Metro fixed route bus service due to disability. He also explains the process, including the need to get a verification of disability from a licensed physician, and the possibility of an in-person interview.

The “Application for Certification of ADA Paratransit Eligibility” has four parts.

- Part 1 requests general information such as address, phone number, need for accessible materials, and an emergency contact.
- Part 2 includes 17 questions about the applicant’s disability, mobility aids, functional abilities, and current travel.
- Part 3 asks the applicant, or parent or guardian, to sign a statement attesting that the information provided is true and correct. The statement also acknowledges that El Metro may contact professionals familiar with the applicant’s functional abilities to get more information as necessary.
- In Part 4, the applicant is asked to sign an “Authorization for Release of Medical Records,” giving El Metro the right to request medical information from the licensed physician who completes “Disability Verification” form.

The “Disability Verification” form requests information on disability and various aspects of functional ability that relate to use of fixed route services. Separate questions about functional ability are asked for applicants with physical disabilities, vision disabilities, and cognitive disabilities. Information about any “other factors” that may apply is also requested.

Recommendation: The current “Disability Verification” form includes the question “Can the applicant ride a regular El Metro bus, or if needed, a wheelchair accessible El Metro bus?” This question should be removed from the form. First, many medical professionals may not understand that the El Metro fixed route service has changed over the years in response to ADA requirements and is therefore accessible to many riders with disabilities. Second, by asking this question, El Metro is in effect turning over the eligibility decision to the medical professional. If the medical professional says that the person is not able to use fixed route service, it would be hard and risky for El Metro to take a different position.

In addition, the phrase “or if needed, a wheelchair accessible EL METRO bus” could easily be misinterpreted. Some professionals could interpret this as the El Lift bus service rather than a fixed route bus with a lift.

El Metro has indicated that it removed the question, “Can the applicant ride a regular El Metro bus, or if needed, a wheelchair accessible El Metro bus?” from the “Disability Verification” Form.

Recommendation: Rather than asking medical professionals (who may not understand the accessibility of the fixed route service or even the exact functional abilities required to use it) to offer a summary opinion, it is better to simply get information about disability and functional ability and then use this information to make the decision.

An applicant can mail a completed application form to El Metro or drop it off at the Laredo Transit Center. El Metro receives an application, it is date stamped and forwarded to the Eligibility Coordinator. The Eligibility Coordinator enters information from the application into an Excel spreadsheet, including date of receipt. The Excel spreadsheet also has fields to enter the dates an application is approved, and “ADA #” and eligibility expiration date, if an application is approved.

Recommendation: El Metro should collect the following additional information and include it in its applicant spreadsheet.

- Field indicating whether this is a new applicant, or a request for recertification of eligibility
- Yes/No field after the date the application is first received indicating whether it was complete or incomplete

- Comment field following the “complete?” field to allow notes to be entered on action taken with incomplete applications (e.g., “mailed back on [date],” or “collected additional info by phone on [date],” or “requested disability verification from physician for applicant on [date].”)
- Field to record the date a completed application is received
- Yes/No field indicating if an interview was required
- Date the applicant was notified that an interview was needed
- Date the interview was conducted
- Comment field to note any delays in completing the interview (e.g., “interview offered on [date] but applicant couldn’t do until [date], or “interview scheduled for [date] but no-showed”).

These additional data fields will help El Metro document that it made a determination in a timely manner (21 days from the date of a completed application and completed interview, if required). The extra fields will also help document if an applicant was the cause of the delay.

El Metro has indicated that it has begun to collect and record this information.

Once information is entered into the tracking system, the Eligibility Coordinator reviews an application to determine if it is complete. If incomplete, he takes one of following steps:

- If only a few questions were not answered, he asks for the information by phone (or goes over the questions with the applicant if he/she has delivered the application in person).
- If the “Disability Verification” section is not completed, he asks if the applicant if he/she would like the application back so he/she can get this section completed by a physician, or if the applicant is okay with his following up with the physician on their behalf. If an applicant agrees to have El Metro assist with getting disability verification, he gets the name of the physician and makes contact on behalf of the applicant. He tells the physician that the person is applying for El Lift service, he needs a verification of disability, and he is sending the required “Disability Verification” form along with a copy of the “Release” form signed by the applicant.
- If an application is not signed, the Eligibility Coordinator either has the applicant sign it immediately (if delivered in person) or attempts to call the applicant to see if he/she wants to come to the El Metro Offices to sign the form or wants the form mailed back.
- If an application arrives by mail and attempts to reach the applicant are unsuccessful, the application is sent back with a letter indicating what additional information is needed.

The Eligibility Coordinator noted that he takes these steps to make the process as easy for applicants as possible. He noted that some applicants are afraid they might have to make an appointment and pay to have a physician complete the “Disability Verification,” while El Metro might be able to get it signed at no cost. The Eligibility Coordinator indicated that efforts to get disability verification on behalf of applicants is “50-50” and if physicians do not send back the required information in a certain period of time he contacts the applicant to let him/her know of the delay and to see if he/she wants to get involved.

Recommendation: It is good that El Metro provides this assistance to applicants to minimize the burden of applying for ADA paratransit eligibility. However, El Metro should develop written procedures on exactly how it will follow up with medical professionals. This ensures that efforts are consistent over time.

Under the current process, if the Eligibility Coordinator does not receive a response from the professional within one week of the faxing of the “Disability Verification” form, he calls the applicant and informs him/her of the lack of response. Applicants should also be informed that it now is their responsibility to get the required verification completed. Follow-up letters with incomplete applications should be sent to confirm the phone conversations. El Metro should keep a copy of the incomplete application on file should the professional subsequently respond directly.

El Metro has indicated that it has developed written procedures on how to follow up with medicals professionals and that it has begun to send follow-up letters to applicants with incomplete applications.

The Eligibility Coordinator reviews all complete applications. He may make a determination based solely on the information contained in the form. If there are still questions about whether an applicant can use fixed route service, the Eligibility Coordinator either calls the applicant to ask additional questions, or sends a letter asking to schedule an in-person interview. In either case, he asks additional questions to clarify information provided in the application form. The interview also allows the Eligibility Coordinator the make limited observations of function (getting to and from the interview setting) as well as responsiveness, comprehension, and behavior when answering questions.

Aside from limited in-person observations when applicants come in for interviews, El Metro’s current process does not include functional assessments. Physical functional assessments are typically performed by physical or occupational therapists and involve recoded observations of applicants performing specific physical tasks, such as the exact time required to walk varying distances, walking speed when crossing intersections, ability to navigate curbs and curb ramps, ability to navigate uneven terrain, ability to get on and off a bus lift and maneuver to and from securement areas. Cognitive assessments typically involve the administration of validated tests to assess skills such as comprehension, attentiveness, memory, problem solving, and/or observations by trained professionals of applicants traveling in the real environment. Orientation and Mobility Instructors/Specialists typically perform assessments of applicants with vision disabilities.

The Eligibility Coordinator indicated that he makes about 50 percent of decisions based solely on the paper application. About 40 percent of decisions involve a follow-up call and phone interview of applicants. About 10 percent of decisions involve an in-person interview.

TYPES OF ELIGIBILITY GRANTED, LETTERS OF DETERMINATION AND EL LIFT IDS

El Metro makes one of two eligibility determinations: either “eligible” or “not eligible.” Full term eligibility, for applicants who do not have temporary disabilities, is granted for 2 years. Temporary eligibility is granted for a shorter period of time, depending on the expected length of disability indicated in the application material or obtained through follow-up or interviews.

El Metro *does not* find some applicants to be “conditionally eligible.” Many other transit systems grant this type of eligibility to applicants who can use the fixed route service for some trips, but require ADA paratransit service for other trips. Common factors that determine whether an applicant needs paratransit include:

- Distances to and from fixed route bus stops for the trips being made
- The lack of sidewalks or curb ramps that prevent travel to and from bus stops
- Inaccessible bus stops where riders cannot get to the boarding area or where lifts cannot be deployed safely
- Extreme weather that might prevent independent travel to and from bus stops
- Familiar versus unfamiliar trips, i.e., trips that an individual has successfully learned how to make by fixed route versus trips he/she has not learned to make on the bus
- Busy or wide streets that cannot be safely navigated because of an applicant’s disability

Experience across the country indicates that about 20 to 40 percent of applicants for ADA paratransit service can make some trips by fixed route, but need ADA paratransit services for other trips.

Once he makes a decision, the Eligibility Coordinator sends out a determination letter. There are two standard letters, one finding the applicant as eligible, and one finding the applicant not eligible. Appendix G presents samples of these two letters.

If an applicant receives eligibility, he/she must go to the Laredo Transit Center to have a photo taken and to get an El Lift ID card. El Metro provides free El Lift service to anyone who is approved and needs transportation to the transit center to get their photo ID.

Recommendation: The DOT ADA regulations require that ADA paratransit eligibility determination processes not be overly burdensome. In compliance reviews of grantees, the Federal Transit Administration (FTA) has found that making applicants appear in person for an interview and then make a second trip to get a photo ID is

excessively burdensome. If an applicant has an in-person interview, El Metro should take a photo during this visit then use this photo to make an ID if the applicant is found eligible. The ID could then be sent with the approval letter.

El Metro has indicated that it takes a photograph of the applicant during the in-person interview.

DOT ADA regulations require that documentation of ADA paratransit eligibility determination letters sent to applicants found eligible contain the following pieces of information:

- Name of the applicant
- Name of the transit system making the certification
- Contact name and phone number at the transit agency where eligibility can be verified
- Any conditions of eligibility, including whether the applicant is authorized to bring a PCA at no fare
- Eligibility expiration date

The approval letter used by El Metro, together with the photo ID (both of which make up the full documentation to applicants), contains most of the information required by the regulations. The letters contain the applicant's name, name of the transit system, and name of the Eligibility Coordinator and a phone number (part of the letterhead). The ID card also contains the eligibility expiration date. Because El Metro does not grant conditional eligibility, the requirement to list applicable conditions of eligibility does not apply. The only piece of information that is not included in either the letter or the photo ID is whether the applicant has been authorized to travel with PCAs when needed.

Recommendations: El Metro should include information about whether or not an applicant is authorized to travel with PCAs when needed in the determination letter. Also, the letter as well as the ID cards should include the expiration date of eligibility.

El Metro has indicated that it has updated the El Lift determination letter and ID card to indicate whether the individual is authorized to travel with PCAs.

The letters informing applicants that they are not eligible must contain information about the right to appeal and information on how to initiate an appeal. The El Metro letters do provide information on the right to appeal. The letters also include an Appeal Request Form.

Letters finding applicants ineligible must also provide an explanation for the denial of eligibility. The applicable section of the regulations, § 37.125(d), says that this explanation must be detailed and specific to the review of the applicant, and cannot be a standard statement that the applicant "can use the fixed route service." The letters used by El Metro do not contain a reason for the denial of eligibility.

Recommendation: El Metro should include a detailed explanation for the decision in the letter that informs an applicant that he/she has been found not eligible. This explanation should describe which pieces of information (e.g., answers to questions provided by applicants, professionals) were key in the decision. The explanation should be detailed enough to allow an applicant to know what additional information he/she would need to provide on appeal, should he/she disagree with the decision and choose to appeal.

ELIGIBILITY DECISIONS

At the time of the site visit, there were 864 individuals in the El Lift master rider file. In September 2012, El Metro received 48 applications from riders seeking recertification as well as new requests for certification. Of these, 39 were complete.

In September 2012, one applicant (2.6 percent of the decisions) was found not eligible. The remaining 38 applicants (97.4 percent) were granted unconditional eligibility. Five of these applicants (12.8 percent) were granted temporary eligibility, and 33 (84.6 percent) were granted full-term, 2-year eligibility. As noted above, El Metro does not issue determinations of "conditional" eligibility.

El Metro did not keep records of its eligibility decisions prior to September 2012.

The decisions for September 2012 are consistent with experiences at other transit systems across the country. Typically, only 2 to 5 percent of all applicants are found not eligible, even in systems that utilize in-person functional assessments. About 10 to 15 percent of all determinations typically are for temporary eligibility. Systems that grant “conditional” eligibility typically find that between 20 and 40 percent of individuals granted eligibility can use the fixed route system under certain conditions.

TIMELINESS OF DECISIONS

The DOT ADA regulations state that applicants must be treated as eligible if a determination of eligibility is not made within 21 days of the receipt of a completed application (49 CFR § 37.125(c)). If an in-person interview or assessment is a required part of the process, an “application” is not considered complete until the interview and/or assessment has taken place. Recent FTA reviews also suggest that transit systems should inform applicants of their right to service should a decision not be made within 21 days—in public information describing the eligibility determination process and/or in letters acknowledging receipt of applications.

The team analyzed 20 application files for decisions made in September 2012 to determine the timeliness of the current El Metro process. The information in the applicants’ files was used to determine the date that El Metro received a completed application. If an applicant had an in-person interview, the date of the interview was also noted and this was considered to be the date of a “completed application.” Table 4.1 provides the result of this analysis. As shown, El Metro made 15 of the 20 decisions (75 percent) in 7 or fewer days. Four decisions (20 percent) were made in 8 to 14 days. Only one decision (5 percent) took longer than 14 days, and no decisions took more than 21 days.

**Table 4.1 – Processing Times for 20 Randomly Selected
El Lift Eligibility Determinations in September 2012**

# of Days from Receipt of “Completed Application” to Determination	Applicants	% of Applicants in Sample
0-7 days	15	75
8-14 days	4	20
15-21 days	1	5
>21 days	0	0
Total	20	100

The Eligibility Coordinator noted that prior to September 2012, El Metro had delays in processing some applications. El Metro did not have a tracking system in place to make sure that applications were processed in a timely manner. Since September 2012, though, determinations do appear to be made in a timely way.

The Rider’s Guide (page 3) says that El Metro will send an approval or rejection letter within 21 days. However, the Rider’s Guide does not indicate that applicants will be able to receive service if the determination takes longer than 21 days.

Recommendation: El Metro should revise the Rider’s Guide to indicate that a determination of eligibility will be made within 21 calendar days of the receipt of a completed application (and the completion of an in-person interview, if required). The Rider’s Guide should also note that an applicant would be allowed to use the service until a decision is made, if it takes longer than 21 calendar days.

El Metro has indicated that it has revised the Rider’s Guide to state that an applicant would be allowed to use the service until a decision is made, if it takes longer than 21 calendar days.

ANALYSIS OF RECENT DETERMINATIONS

To get an idea of the accuracy and appropriateness of determinations, the team examined files for 20 randomly selected eligibility determinations made in September and October 2012. The team examined information provided in the application form, as well as notes from any interviews or follow-up contacts. Each decision was also discussed with the Eligibility Coordinator.

Two of the 20 applicants were found to be not eligible. In both cases, information in the file supported the decisions.

In the remaining 18 cases, applicants were found eligible. Again, information in the file supported the decisions. In three of these cases, the information in the files indicated that the applicants probably could use fixed route service some of the time. In one other case, information in the file suggested that the applicant might be able to use fixed route service for some trips. However, because El Metro does not use “conditional” eligibility, all four of these applicants received standard, unconditional 2-year eligibility.

Recommendation: El Metro should consider granting conditional eligibility when appropriate. To do this, the eligibility determination process needs to be detailed enough to identify when, *and under what conditions*, individuals can use the bus. There are two options for enhancing the process and making conditional determinations:

1. El Metro could require interviews for all individuals who are not clearly unconditionally eligible. During the interviews, the Eligibility Coordinator can ask questions about current as well as recent use of fixed route bus service. More detailed information could also be obtained about key issues, such as maximum walking distance, ability to travel in extreme weather conditions, the need for sidewalks and accessible paths of travel, and types of streets and intersections that can be safely crossed. As needed, the Eligibility Coordinator can also follow-up with professionals who have completed the “Disability Verification” form to confirm information gathered during the interview.
2. El Metro could retain the services of a licensed rehabilitation professional to conduct functional assessments as needed. The Eligibility Coordinator could review completed applications and conduct follow-up telephone interviews as needed. If this does not result in a clear decision, though, he can ask applicants to participate in an in-person functional assessment conducted by a licensed rehabilitation professional. These assessments can take place in the real environment in the area of the Laredo Transit Center. Assuming about 40 completed applications per month, and about 20 percent in-person assessments, the rehabilitation specialist would conduct about eight functional assessments per month. Allowing 2 hours each, this would require about 16 hours per month. If El Metro contracted directly with a rehabilitation professional (occupational therapist or physical therapist), it is estimated that this would cost about \$60 per hour, about \$960 per month, or about \$11,520 per year. Alternately, El Metro could contract with a local rehabilitation agency to supervise a professional to conduct determinations. If El Metro uses this approach, the contract would likely include overhead and administrative costs and each assessment would cost an estimated \$150. With eight assessments per month, this would be about \$14,400 per year. In addition to these direct labor and possible administrative costs, El Metro would need to spend about \$25,000 in one-time costs to develop indoor props needed to do assessments during extreme weather conditions when it would not be appropriate to go outdoors.

The in-person functional assessments would be primarily used for applicants with physical functional assessments. Persons with physical disabilities typically are the largest subgroup of applicants and account for about 60 to 70 percent of all applicants. For applicants with cognitive disabilities, psychiatric disabilities, and vision disabilities, El Metro can continue to make decisions based on information provided in the applications forms and information gathered from follow-up contacts with applicants and identified professionals.

If El Metro implemented a travel-training program, it could also conduct in-person assessments for some applicants with cognitive disabilities. Persons with mild intellectual disabilities could be asked to meet with qualified travel trainers who would conduct the assessments. Applicants with cognitive disabilities typically account for about 15 percent of all applicants. Those with less severe cognitive disabilities, for whom in-person assessments might be appropriate, would perhaps be about 5 percent of current applicants.

The 2003 Paratransit Plan Update called for El Metro to incorporate functional assessments into the eligibility determination process and to work with a contractor to establish this process. This is a worthy action.

El Metro has indicated that it intends to implement conditional eligibility for El Lift.

4.3 APPEAL PROCESS

As noted above, individuals who do not agree with initial eligibility decisions can request an appeal by filling out and returning an Appeal Request Form. Appendix H presents a copy of the form. The letter to applicants indicates that they have 60 days to request an appeal. However, the Rider's Guide (page 4) indicates that a request for appeal must be filed within 20 days. The DOT ADA regulations require that appeals be accepted if requested within 60 days.

The Appeal Request Form asks applicants to again provide information about their disability, as well as information about mobility aids used. It also asks applicants to explain why they think the decision was incorrect and to again state why they cannot use the fixed route bus service.

The DOT ADA regulations state that appellants have the right to be heard in person. In past paratransit compliance reviews, FTA has indicated that transit systems can request that appeals be requested in writing, but cannot require that appellants make their case for an appeal in writing.

Recommendations: El Metro should revise the Appeal Request Form to not require that appellants provide an explanation of the reason they do not agree with the decision. The form should simply ask individuals to provide their name, address and phone number, and check a box indicating that they would like to arrange an in-person appeal. If El Metro elects to continue to ask for an explanation of why the appellant does not agree with the decision, this should be requested as *optional information*.

The Rider's Guide should also be revised to indicate that an applicant has up to 60 days to request an appeal.

El Metro has indicated that it is discussing these changes with its Paratransit Advisory Committee.

The 2003 ADA Paratransit Plan Update does not provide information about who will hear appeals. The Eligibility Coordinator indicated that he could not recall an appeal being heard and also was not aware of exactly who would hear appeals. Other El Metro staff indicated that the policy is to have appeals heard by the Paratransit Advisory Committee (PAC), which consists of nine members of the community, some of whom are El Lift riders.

Recommendation: El Metro should develop a full appeal process, including who will hear appeals. The full PAC should not hear appeals. Having people present and discuss their disability and functional abilities before the full PAC could be intimidating and could make it extremely difficult to ensure confidentiality. Instead, El Metro should develop a list of PAC members, as well as other members of the community with expertise on disability, who it can call on to hear appeals. Three individuals from this list can hear each appeal. Individuals should be selected based on the knowledge they have regarding the disability of the appellant.

El Metro has indicated that it is discussing these changes with its Paratransit Advisory Committee.

4.4 RECERTIFICATION

As noted above, El Metro grants eligibility for 2 years to applicants who do not have temporary disabilities. The Rider's Guide indicates, "El Metro will notify participants of the recertification requirement at least 90 days prior to the expiration of their eligibility period." As of October 2012, however, El Metro was not sending out notices of eligibility expiration. Instead, riders were being informed of the need to re-certify when they called to book trips. Agents in the El Lift operation center let riders know when their eligibility is about to expire, or in some cases that their eligibility has expired. If a rider's eligibility has expired, the agents notify the Eligibility Coordinator and the rider's eligibility is extended.

Recommendations: While the lack of notification of the need to reapply has not resulted in service denial, it is a good practice to provide notice to riders in advance. El Metro should begin generating lists of riders whose eligibility is scheduled to expire, and notifying these riders of the need to reapply. Providing this notice 90 days in advance would be a good practice.

El Metro should also consider extending the period of eligibility for riders whose disability is not temporary. Most transit systems provide eligibility for 3 or 4 years. Some systems also provide even longer-term eligibility, or offer a shortened application form, to individuals who cannot use fixed route service under any conditions

(“unconditionally eligible”) and whose functional abilities are not likely to change. Some systems only require these individuals to submit a brief (one or two pages) re-application that updates general information and asks if there have been any changes in abilities or needs.

El Metro has indicated that it has extended the period of eligibility for riders whose disability is not temporary from 2 years to 3-4 years.

El Metro has indicated that it is mailing letters one month in advance to riders whose eligibility is scheduled to expire.

4.5 NO-SHOW SUSPENSION POLICY

Section 37.125(h) of the DOT’s ADA regulations states that transit systems “may establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit service to ADA-eligible individuals who establish a pattern or practice of missing scheduled trips [no-shows].” Before imposing a suspension, a two-stage appeal process is required. A rider must first have the opportunity to challenge the no-shows recorded against him/her (either as not correct or as being outside his/her control). Following this first-level review, and before any suspension can be enforced, a rider must have an opportunity to appeal the suspension to an independent authority. A rider must have an opportunity to appeal in person for the formal appeal. The DOT ADA regulations do not explicitly permit penalization for late cancellations. However, FTA has permitted penalties for late cancellations when they have the same effect on the system operations as no-shows. Finally, in recent paratransit compliance reviews, FTA has indicated that the determination of a “pattern or practice” should consider not only the absolute number of no-shows, but also the *frequency of rider no-shows*. FTA has suggested that rider no-shows should be much higher than the system average (perhaps two to three times higher) to be considered a pattern or practice.

El Metro’s no-show policy is explained on page 11 of the Rider’s Guide. No-shows are defined as incidents for which a passenger fails to board and the vehicle has waited at least 5 minutes within the 30-minute ready-time window. Late cancellations are defined as cancellations that occur less than 2 hours before the start of the ready-time window. Cancels at the door are defined as the term implies (although the definition does not mention that the vehicle must arrive within the ready-time window).

The El Metro policy calls for warning letters to be sent to a rider when he/she has a combination of three no-shows, late cancels, or cancels at the door in a 30-day period. If a fourth no-show, late cancel, or cancel at the door is recorded in the same 30-day period, El Metro says that it sends a written notice of a 7-day suspension. If a rider then has a combination of five or more no-shows, late cancels, or cancels at the door in the following 30-day period, he/she can be suspended from service for 30 days.

The current El Metro policy also states, “Every attempt will be made to informally resolve disagreements concerning specific No-Shows by encouraging passengers to discuss in details of a no-show occurrence, which may be in dispute [sic]. Any suspension of service for repeat No-Shows will include the opportunity for the passenger to submit a written appeal, which must be describe how the No-Show occurrences, which resulted in the suspension, were outside the control of the passenger [sic].”

El Metro currently is not imposing suspensions for excessive no-shows.

Recommendations: El Metro should revise its no-show policy to consider the frequency of no-shows as well as the absolute number. El Metro can send a warning letter after three no-shows in a 30-day period. However, before enforcing a suspension for four or five no-shows, El Metro should look at the full rider trip history for the period of time and determine the frequency of no-shows as well. El Metro should impose a suspension only if the four or five no shows amount to more than 15 percent of all trips scheduled and not cancelled in advance by the rider.

Also, El Metro should revise its policy to provide a two-stage appeals process. The warning letters should provide detail (date, time, location) of the three no-shows recorded. A rider should be encouraged to contact El Lift if he/she feels any of the no-shows were either recorded in error or were outside of his/her control. Subsequent letters proposing suspensions should also contain similar language. In both cases, a rider should be

allowed to call El Lift to question the no-shows, rather than submitting written appeals. If recorded no-shows are not challenged, or are unsuccessfully challenged, and a suspension is pending, El Metro should then inform a rider that he/she has the right to appeal the suspension to an independent authority. El Metro should establish an independent process to hear these appeals. Individuals hearing and deciding these appeals should not include those who were involved with the initial proposed suspension (or those in a direct line of authority), and a rider should have the opportunity to be heard in person, rather than required to submit written appeals.

Finally, before imposing any suspension, El Metro must ensure that it has detailed documentation on any no-shows recorded. Each time a no-show is recorded, agents should enter the following information into the trip scheduling software system:

- Time of vehicle arrival at the pickup address
- Time that an El Lift agent attempted to call the rider and the results of the call (no answer, spoke with rider)
- Time the no-show was authorized and the vehicle departed
- Some descriptive information of the location (e.g., tan house with green shutters)

No-show procedures should also include rechecking and confirmation of the pickup location by the dispatchers authorizing the no-shows.

El Metro has indicated that it has revised its no-show policy and has sent letters to El Lift riders informing them of the policy.

El Metro has indicated that El Lift agents are following new procedures to document their actions before declaring a rider no-show and recording their activities in the software system.

5 TELEPHONE ACCESS

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. Experiencing significant telephone delays to place or confirm trip requests or to check on rides could discourage people from using the service and could therefore be considered a form of capacity constraint. The team collected the following information:

- Consumer input obtained through telephone interviews with riders, advocates, and agencies
- Standards for telephone answering performance
- Design of the phone system and the staffing of phones
- Practices for handling of calls in both reservations and dispatch through direct observation

5.1 CONSUMER INPUT

Five complaints received by El Metro from January to September 2012 concerning El Lift service pertained to telephone access: four said that there was no answer when the rider was trying to call; one cited a problem with audibility during the call.

5.2 PHONE SERVICE STANDARDS AND PERFORMANCE MONITORING

El Metro does not have a formal standard for telephone hold times.

Recommendation: El Metro should develop a standard for telephone hold times. The standard should have the structure of El Lift agents should answer at least X percent of incoming calls within Y seconds. 100 percent of calls should be answered within Z seconds. This performance is measured on an hourly basis, for all hours that El Lift accepts calls for trip requests or dispatch.

Typical value for X: 95 percent

Typical value for Y: 90 seconds

Typical value for Z: 180 seconds (3 minutes)

5.3 PHONE SYSTEM DESIGN

El Lift advertises one main voice telephone number for its service (956-795-2290). The same number is used for administration, customer service, and trip scheduling. There is no separate TTY number advertised. The current system is a Simplex system, with one main line, and four rollover lines. When riders call the main number, an El Lift agent answers the phone. If necessary, the agent asks if the caller can be placed on hold.

The telephone system is also equipped to record all calls and management is able to electronically call up and listen to calls for training and complaint investigation purposes.

The current Simplex system does not have the capability to track or report hold times. However, several team members observed the answering of calls for several hours during different days and different times of day during the site visit week. The vast majority of calls were answered immediately, with no holds. Only occasionally did the number of calls exceed the number of agents available. Even in these instances, hold times generally never exceeded 30 seconds.

Recommendation: El Metro should consider upgrading to an automatic phone system with the ability to monitor and report on call statistics.

5.4 STAFFING

All El Lift agents serve as call-takers to accept trip reservations (see Section 7 for a discussion of the agents' role as vehicle dispatchers). As of October 2012, El Lift had four full-time agents and one agent who worked 36 hours per week. Weekly schedules for the agents are shown in Figure 5.1. Figure 5.1 also shows the number of agents scheduled to be on duty by day and hour.

On weekdays, the staffing level and schedules allow for three to five agents to be on duty for most of the hours that the trip reservation line is open. The exceptions to this are: on Mondays through Thursdays there are two agents scheduled between 3 and 4 p.m.; and on Fridays there are two agents from 3 to 4 p.m. Before and after the trip reservations line is open (6 to 8 a.m. and 5 to 8 p.m.), there is always one agent on duty on weekdays.

On weekends, one agent is on duty from 6 a.m. to 2 p.m. and a second agent reports at noon and works until 8 p.m. However, contrary to information in the Rider's Guide and on the El Metro website, agents said that they did not accept trip requests on weekends.

Recommendation: El Lift agents must accept trip requests on all days prior to a day when service is provided. This includes weekends and holidays if El Lift operates on the following day.

El Metro has indicated that it has adjusted its staffing of El Lift agents, so that it is accepting trip requests 7 days a week from 8 a.m. to 5 p.m.

Mondays															
Agent	AM						PM								
	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8
1															
2															
3															
4															
5															
# of Agents	1	1	3	3	3	4	3	3	3	2	3	1	1	1	
Tuesdays															
Agent	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8
1															
2															
3															
4															
5															
# of Agents	1	1	3	3	3	4	3	3	3	2	3	1	1	1	
Wednesdays															
Agent	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8
1															
2															
3															
4															
5															
# of Agents	1	1	3	3	3	4	3	3	3	2	3	1	1	1	
Thursdays															
Agent	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8
1															
2															
3															
4															
5															
# of Agents	1	1	3	3	3	4	3	3	3	2	3	1	1	1	
Fridays															
Agent	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8
1															
2															
3															
4															
5															
# of Agents	1	1	4	4	4	5	3	3	3	2	3	1	1	1	
Saturdays & Sundays															
Agent	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8
1															
2															
3															
4															
5															
# of Agents	1	1	1	1	1	1	2	2	1	1	1	1	1	1	

Figure 5.1 – El Lift Agent Work Schedules

6 TRIP RESERVATION PROCESS

This section discusses how El Lift handles trip requests from its riders. Section 37.131(b) of the DOT ADA regulations requires the transit system to schedule and provide paratransit service to any ADA paratransit eligible person at any requested time on a particular day in response to a request for service made the previous day. Reservations may be taken by reservation agents or by “mechanical means” and can be made via “real-time scheduling.” A transit agency may negotiate pickup times with the rider but cannot require the rider to schedule a trip to begin more than one hour before or after the individual's desired departure time. At the transit system’s discretion, reservations may be made up to 14 days in advance.

In particular the team looked at policies regarding trip reservations and whether El Lift uses any form of trip caps or waiting lists. In addition, the team analyzed whether there is a pattern or practice of denying a significant number of ADA-eligible trip requests. Finally, the team examined the policies and procedures concerning the negotiation of requested trip times.

The team gathered and analyzed the following information:

- Consumer input from riders and advocates, and through a review of comments and complaints on file at El Metro
- Reservations policies and performance standards
- Service reports prepared by El Metro showing the number of trips served and the number of trips denied for the past three years
- Direct observations of the handling of trips by the team and interviews with El Metro staff about the ability to accommodate trip requests

6.1 CONSUMER INPUT

One of the complaints received by El Metro from January to September 2012 concerning El Lift service pertained to trip reservations: a woman said that a trip that requested for her father one week in advance was cancelled without notice.

During the October 2012 public hearing, several attendees had comments about the trip reservation process.

- A rider said that she has been told by El Lift agents that one cannot get a ride for the next day
- The son of an El Lift rider said that needing to reserve trips 1 week in advance is difficult; even if he calls a week ahead, he may not get the requested trip. Yet when he has called 1 day ahead, he has been told that the schedule is full. He also noted the long wait for call-back trips
- A rider said that she uses El Lift three times a week, but is not able to get subscription service
- A rider said that she cannot get a trip when she calls 2 days in advance and “it’s worse on holiday weeks”

6.2 INITIAL TRIP BOOKING PROCESS

El Metro uses Trapeze software (Version 10) to record, schedule, and dispatch trips. The team spent several hours over several days observing the trip reservation process. With only slight variation, reservations agents followed the procedure detailed below when handling a typical request for a round trip (2 one-way trips):

- Caller typically identifies him or herself and indicates he/she is calling to request a trip on a particular day. The agent enters the person’s name into the trip-booking screen, which calls up rider information and populates certain fields in the trip-booking screen (including home address, mobility aids used).
- The agent confirms the day/date of the trip and enters the date into the trip-booking screen.
- The agent asks the rider where he/she is going and enters the destination address into the system. Agent then searches to see if the destination is already in the system and geocoded. If so, the agent selects the

geocoded address and the system automatically populates the destination address fields. If the destination is not in the system, agent goes through the process of geocoding the address.

- The agent next asks, “What time would you like?” Some riders might just state a time, and the agent enters this time into the “Req” field in the “Origin” portion of the trip-booking screen. Sometimes a rider provides an *appointment* or desired *arrival time*. When this occurs, agent enters the appointment/desired arrival time into the “Req” field in the “Destination” portion of the trip booking screen, and then asks the rider when he/she would like to be picked up for the “going” trip. Agents sometimes “coach” riders by suggesting that they ask to be picked up 1 hour before their appointment/desired arrival time. If this pickup time is different from a rider’s initial request, the agent then enters this time into the “Req” field in the “Origin” portion of the trip-booking screen, over-writing the appointment/desired arrival time that had previously been entered into this same field.
- The agent then prompts the system to search for possible placements of this trip on vehicle runs. If the system identifies possible run placements, the agent typically selects the option that shows a pickup time closest to the time requested by the rider. The agent then has the system display the trip placed on this vehicle run to make sure that the addition of this trip on the run is “workable” in terms of the entire schedule. If the placement looks problematic, the agent selects another vehicle run and conducts the same review.
- Once the agent identifies an appropriate placement for the trip onto a vehicle run, the agent lets the rider know the pickup time estimated by the system. For example, if the rider requests a 9 a.m. pickup and the system provides a run placement option that showed a 9:10 a.m. pickup, the agents might say something like “I don’t have a 9 a.m. pickup, but I have a 9:10. Is that okay?” If the time is acceptable to the rider, the agent confirms the rider’s acceptance and books the trip (i.e., conducts a “handshake” that creates the “negotiated” time in the system).
- If the system does not find any solution for a trip request, the agent might change the requested pickup time to see if there are options available at different times. If no scheduling options are identified after searching several different times, the agent might advise a rider that there are no available trips at that day and time and asks rider if he/she wants to be placed on the “standby” list. The agent lets riders know that if there are cancellations, El Lift might be able to fit the trip in and an agent call if the trip can be scheduled later. If the rider opts not to be placed on the standby list, the agent records this request as a trip denial.
- For return trips, the agent prompts the system for a return, which swaps the addresses of the origin and destination. The agent then typically asks something like “When would you like to return?” The agent enters the requested pickup time for the return trip into the “Req” field in the “Origin” portion of the screen and the process of identifying, confirming, and entering an appropriate time is repeated.
- If the requested trip is a non-dialysis medical trip, the agent asks, “Would you like to call when ready?” If the rider chooses to do this, the agent does not enter a return trip into the system. It is left as a “will-call” to be requested and scheduled on the day of service.
- The agent typically closes with a general confirmation that the trip is all set.

While observing the handling of trip requests, the team members noted issues with the settings in the scheduling system. The Trapeze system offers two key settings for booking, scheduling, or rescheduling trips.

- **Search W** tells the system to search for possible scheduling options any time within a pre-set “Search Window.” If not selected, the system only searches for options at the specific time requested, e.g., “8 a.m.” but not 7:55 or 8:10.
- **Use Neg** (use negotiated time) setting tells the system to not change the negotiated time during the scheduling process.

Typically, when *initially* accepting and scheduling trip requests, most transit systems turn on the “Search W” option: this allows the system to search broadly for scheduling solutions; and most transit systems turn off the “Use Neg” option (since there is no negotiated time if the trip is just being booked). If a trip has already been

booked and an agent is *rescheduling* or *moving* that trip, the “Search W” options is turned off and the “Use Neg” option is turned on (to protect the existing negotiated time).

Team members observed that El Lift agents are initially scheduling trips without turning on the “Search W” option. In addition, as noted below, one of the parameter settings in the system was to “Sync Neg/Sch w/ Req Times.” This setting tells Trapeze to set any negotiated/scheduled times selected by an agent equal to the requested pickup time. In some cases, agents have the “Use Neg” option turned on during the initial trip booking process.

As a result of these system settings, agents were booking trips on runs at the pickup times requested by riders, rather than at the times indicated by Trapeze that the trips could efficiently be performed. For example, if a rider requests a 9 a.m. pickup for a 10 a.m. appointment, the Trapeze system might indicate the trip could be performed at 9:10 a.m. If this time is accepted, and the agent does a “handshake” to save the trip, it goes into the system as a 9 a.m. pickup, even though Trapeze is indicating that it really cannot be performed at 9 a.m. and is instead offering a 9:10 a.m. pickup as a good solution. In addition, not having the “Search W” option turned on means that the Trapeze system is not searching the entire scheduling window for solutions. ADA regulations allow a trip to be scheduled up to 1 hour before or after the requested time. With the “Search W” turned off, the Trapeze system is limited to looking for solutions only within the 30-minute on-time window around the requested time.

An addition problem with not having the “Search W” turned on is that a rider might be misinformed about the scheduled pickup time. In the example above, if Trapeze suggests a 9:10 a.m. pickup, the agent might say to the rider “I don’t have a 9:00, but I have a 9:10.” This might lead the rider to expect a pickup at 9:10 a.m. But when the agent saves the trip in Trapeze, it goes in as a 9 a.m. pickup.

This observation is confirmed by the observation that the final driver manifests almost always show pickups scheduled on the hour, half-hour or quarter-hour. Typically, if solutions times generated by Trapeze are being entered into the system, the scheduled pickup times would be to the minute (e.g., at 9:12 or 9:27, rather than at 9:00 or 9:30).

Recommendations: El Metro should review the parameter settings in the scheduling system with Trapeze technical staff and discuss the “Sync Neg/Sch w/ Req Times” setting. If the Trapeze staff agrees that this setting is causing requested times to always be entered on runs, rather than Trapeze-generated scheduled times, El Metro should consider changing this setting.

In addition, El Metro should discuss with Trapeze technical staff the proper use of the “Search W” and “Use Neg” settings for initial trip bookings versus subsequent rescheduling, batching, moving of trips, etc. If Trapeze staff agrees that the “Search W” setting should be turned on and the “Use Neg” turned off for the initial booking process, El Lift agents should be directed to use the settings in this way. Similarly, if the “Search W” setting should be turned off and the “Use Neg” setting turned on for any subsequent rescheduling, batching, or moving of trips, agents should be instructed to use the settings in this way.

El Metro has indicated that it will review parameter settings in its Trapeze scheduling software “pending new software.”

As noted above, the team observed that agents were not recording appointment times when booking trips. As a result, the times that riders need to get to destinations is never captured in the system to ensure that scheduling and grouping of trips is done in a way that gets riders to appointments on time. In recent compliance reviews of grantee agencies, FTA has indicated that it considers on-time arrivals to be as important as on-time pickups. In standard industry practice, paratransit operations record appointment times when booking “going” trips, and used the appointment times to schedule the “going” trips.

Also as noted above, the current practice of El Lift agents is to encourage riders to request a pickup time that is 60 minutes before their appointment times. While this may work for a trip of 30-45 minutes, it could result in late drop-offs for very long trips. It could also result in very early drop-offs for very short trips. As presented in Section 7, an analysis of a sample of El Lift trips shows that 40 percent of trips with an appointment time had drop-offs that were more than 30 minutes early.

Recommendations: El Lift agents should begin to enter all requested appointment/desired arrival times when booking trips. This can be done by entering the appointment/desired arrival time in the “LT” (latest time) field in the “Destination” portion of the trip-booking screen. Agents can still enter a requested pickup time in the “Req” field in the “Origin” portion of the trip booking screen, and search for scheduling options based on the requested pickup time. But entering the appointment time so that it shows up on the driver’s manifest is important for ensuring that a rider gets to the destination on time.

El Metro should carefully review the current settings of the Trapeze scheduling parameters before the agents change their procedure for booking trips. Two settings that should be changed prior to capturing appointment times are: the “Tolerance – DO Early” and “Tolerance – DO Late” settings. Both of these parameters are currently set at 15 minutes, which means that the Trapeze system schedule trips to get riders to destinations from 15 minutes before the time entered in the “LT” field (the appointment time) to 15 minutes after the “LT” time. Clearly, the settings should not allow drop-offs after the appointment time. Instead, the early tolerance should be set at 30 minutes and the late tolerance be set at 0 minutes. This would tell Trapeze to schedule trips to get a rider to the destination from 30 minutes before the appointment time to zero minutes after the appointment time (-30/0).

El Metro should explore with Trapeze technical staff the option of searching for appropriate pickup times based on the appointment times, rather than on requested pickup times. If done correctly, the system will suggest pickup times that are appropriate for the length of the trip. Very short trips may not need pickups 60 minutes ahead, while very long trips may need pickups more than 60 minutes ahead.

To do scheduling based on appointment times properly, El Metro should review and adjust other system parameters. In particular, the maximum travel time parameter settings have to be set correctly. For example, if El Metro sets a single maximum travel time is set (e.g., 90 minutes)—rather than a range of maximum travel times—the system could generate very early pickups. That is because the system may allow up to 90 minutes of travel time, even for short trips, in order to make other pickups on-time or to increase vehicle productivity. Instead of setting a single travel time maximum, El Metro can use “Maximum OBT (On-Board Time) Factors.” This option would allow El Metro to establish several maximum travel times for trips of varying lengths.

El Metro should work closely with Trapeze technical staff to set these parameters correctly before moving to scheduling trips based on appointment times. El Lift staff should test the new settings before making the changes for actual passenger service. After adjusting these settings with Trapeze’s help, the reservations and scheduling process will be no more difficult for the agents, but the results will be better for the riders.

El Metro has indicated that its agents enter requested appointment times into the Trapeze scheduling software.

El Metro has indicated that it will review parameter settings in Trapeze “pending new software.”

During their observations, team members also noted that agents were not consistently confirming and verifying key information during the trip booking process. They were confirming days and dates, but were not confirming and verifying home and origin addresses, telephone numbers, types of mobility aids used, or whether PCAs and/or companions would accompany riders. Agents seemed to know many of the riders, as well as many of the trips that riders were booking. However, while a rider may call for similar trips 95 percent of the time, there may be occasions when he/she is calling for a different trip that may not originate at the home. A rider’s home address or telephone number may also change over time and this may not be caught the first time a trip is booked following the change. Also, a rider may not always use the same mobility aid or may not always travel with a PCA or companion. In general, even in smaller operations in which the agents may know riders and their trips, it is good practice: to always confirm the home address and telephone numbers on file; to confirm that trips will be originating from the home address; and to ask about mobility aids and PCAs/companions. It is also good practice to do a complete confirmation of key information at the end of the trip booking process.

Recommendations: El Metro should instruct agents to confirm and verify key trip information for all trip bookings. The confirmation/verification should include:

- Confirmation of the trip day/date
- Verification of the home address and telephone numbers on file

- Confirmation that the trip requested will originate from the home address
- Verification of any special pickup instructions that may be on file for the home address
- Verification that any times given for “going” trips or “middle” trips are appointment times versus requested pickup times
- Verification of any special instructions that may be on file for destination addresses (or inquiring about special instructions if none are on file)
- Verification of mobility aids that will be used for the trip (e.g., “Will you be using a wheelchair for this trip?”)
- Confirmation of any PCAs or companions that may be traveling with eligible riders (e.g., “Will you be traveling alone, or will someone be traveling with you?”)
- A final confirmation of the day/date, origin, pickup time, destination, and any special pickup instructions for each trip booked.

To help agents in this task, El Metro should develop a script for agents to follow to ensure that they consistently follow these procedures.

El Metro has indicated that it has developed a script for El Lift agents to follow when they are accepting trip requests.

Team members also observed that when agents discuss return trips from non-dialysis medical appointments with riders, they typically ask, “Would you like to call when ready?” If a rider agrees to call for a return trip when his/her medical appointment is complete, an agent does not enter the return trip in the system. A rider then calls on the day of service when ready for a pickup. At that time, the agent enters a return trip into Trapeze. El Lift’s policy is that a rider may have to wait for up to 2 hours for these “will call” return trips. In the team’s experience, when a paratransit operation allows will-call requests, the dispatcher is usually able (but does not guarantee) to make the pickup within 60 minutes of the time that the rider contacts the reservations/control center to request a return ride.

Based on public comments, it seems that not all riders are aware of the potential long wait time if they opt for “will-calls” rather than requesting a time for their return trip. Some rider complaints about very late pickups appear to be for will-call trips when riders waited up to 120 minutes.

A high proportion of El Lift’s will-call requests take place at peak operating hours when it is difficult to add trips to existing runs. There are about 10-20 will-call trips each weekday morning and about 10-20 will-call trips each weekday afternoon. Most occur between 11 a.m. and noon or between 1 and 3 p.m. Team members observed that it was difficult for agents to find scheduling options for some of these trips. Consequently, wait times for pickups can sometimes be very long—well over an hour.

Recommendations: El Metro agents should present callers with more information about what it means to be a “will call” for return trips. Each time a possible will-call is discussed, riders should be told that, if they opt to be “will-calls,” they might have to wait up to 2 hours for their return pickups. The option of conservatively estimating a return pickup time should be given to riders, e.g., one hour after they expect to be finished with their appointment.

El Metro should also consider revising its policy to allow up to 2 hours to make a pickup for a will-call request. Allowing up to 2 hours is a poor policy from a service quality perspective and can result in perceptions of poor service. A 60-minute policy would also be consistent with national norms for will-calls.

El Metro should also consider limiting will-calls for certain medical offices, clinics, or facilities that have a record of keeping riders well past expected completion times. If riders have not experienced long delays with appointments, agents should encourage them to book return trips, perhaps with a conservative estimate of the completion time, e.g., 60 minutes after the appointment is expected to be complete.

Finally, El Metro agents should enter will-call trips into the Trapeze system. Trapeze allows will-call trips to be saved as unscheduled trips without pickup times. By including trips without return times in the day’s list of trips,

El Lift staff would have a better estimate of the number of will-call trips each day. This might lead to planning extra capacity when there are a large numbers of will-calls.

El Metro has indicated that it has updated information that it provides to El Lift riders to explain that a will-call request might take up to one hour to respond to.

7 SERVICE PERFORMANCE

7.1 SCHEDULING PROCEDURES AND STAFFING

One of the El Lift agents serves as the primary scheduler. The team discussed with this agent the procedures used to create final run schedules. Parameter settings in the Trapeze system that affect scheduling were also reviewed.

The following procedures are used to open runs, review trips scheduled onto runs, and create final run manifests:

- At the beginning of each day, before the reservations line is open, one of the agents opens the day of service that is seven days out and loads subscription trips into the system. It was noted that while subscription trips are batch scheduled and placed on runs, they are not “templated,” meaning they are not “locked” or “anchored” onto set runs at set times. As a result, during subsequent scheduling of trips, or re-batching of trips, subscription trips can and do move around in the system.
- Two days prior to each day of service, the agent who is the lead scheduler manually moves subscription trips that have been moved around in the system back to the desired locations. Manually constructing a subscription template each day is a considerable effort and takes a good deal of this agent’s time.
- Next, the agent batch schedules the Demand (non-subscription) trips. Typically, the batch successfully places all but 30-40 Demand trips on runs.
- The agent then manually schedules the remaining unscheduled Demand trips. Doing this also may require that some trips that have been batch scheduled by Trapeze be moved between runs. When placing unscheduled trips or moving trips between runs, the agent both “drags and drops” trips to runs, and unschedules and reschedules trips using the software to find possible solutions. It was noted that the agent correctly has the “Use Neg” setting toggled on when unscheduling and rescheduling trips to protect existing negotiated pickup times.
- From two days out until the afternoon before the day of service, the agent scans and fine-tunes runs.

Recommendations: It is strongly recommended that El Metro “template” subscription trips in the scheduling system. It is commonly accepted that creating and maintaining an efficient subscription template is one of the most important things that can be done to maximize productivity. Once all subscription trips are template and anchored on runs, the lead scheduler should regularly review the template to make sure that it is still as efficient as possible. Over time, as some subscription trips are discontinued or new ones added, it is important that the template be revised to remain efficient and productive. The lead scheduler should also negotiate with riders when small changes in pickup times might allow for more efficient “templating” of subscription trips.

El Metro has indicated that it will develop templates for subscription trips.

The scheduling system parameter settings were also reviewed. Table 7.1 shows key settings at the time of the review. The team had questions about several of the settings. These are shown in bold italics. Possible changes to the settings, which El Metro should discuss with Trapeze, are also provided.

Table 7.1 – Selected Key El Lift Scheduling System Parameter Settings

Parameter	Current Setting	Possible Setting to Discuss with Trapeze
Sync Neg/Sch w/ Req Times	Yes	No
Sync Sch w/ Neg Times	Yes	
Tolerance – Apply to Drop-off	No	Yes
Tolerance – DO Early	15	30
Tolerance – DO Late	15	0
Tolerance – Pickup Early	25	15
Tolerance – Pickup Late	25	15
OBT Factors Based on Req Time	No	
Max OBT w/o Transfers	1 h 00	
Max OBT w/ Transfers	2 h 00	
Maximum Hostage Time	5	
Late Cancel Threshold (min)	60	120
Distance Calc Method	Triangulation	
Backtrack Threshold (range = 0 – 62.14)	0.62	
Backtrack Ratio (range = 0 – 1)	0.50	
Average Speed	31.08	20-22 (?)
CTM Wizards – Early Time	1 h 00	
CTM Wizards – Late Time	1 h 00	
Unschedule on ReqTime Change	No	

Recommendations: El Metro should consider the following parameter changes:

1. First, the “Sync Neg/Sch w/ Req Times” parameter is set to “Yes.” As noted above, it appears that this setting makes negotiated or scheduled times match with requested times. When scheduling options are generated and then saved, it appears that this setting is telling the system to default back to the requested pickup time. A “No” setting should be discussed with Trapeze.
2. The “Tolerance Apply to DO” parameter is set at “No,” the “Tolerance – DO Early” is set at 15, and the “Tolerance – DO Late” is set at 15. As noted above, this appears to create a -15/+15 on-time window for drop-offs. And, by setting the “Tolerance – Apply to Drop-off” to “No,” it appears to be telling the system to ignore on-time drop-offs as a factor. El Metro should discuss with Trapeze setting these parameters to “Yes,” 30, and 0.
3. The “Tolerance – Pickup Early” is set to 25, and the “Tolerance – Pickup Late” is set to 25. This appears to establish a -25/+25 ready window (50 minute on-time window), which is not consistent with El Metro policies. The settings should be 15 and 15 to create a -15/+15 ready window (30 minute on-time window).
4. The “Late Cancel Threshold” is set to 60 minutes. This does not appear to be consistent with El Metro policy that defines late cancellations as cancellations that occur less than two hours (120 minutes) before the scheduled pickup time.
5. The “Average Speed” is set at 31.08 miles per hour. This seems very high given that most travel throughout the El Lift service area is via city streets. Speed settings of 20-22 mph are more typical for city ADA paratransit programs.

El Metro has indicated that it will review parameter settings in Trapeze “pending new software.”

7.2 RADIO DISPATCH STAFFING AND PROCEDURES

All mentioned in Section 5, El Lift agents serve call-takers to accept trip reservations. They also service as radio dispatchers and communicate with vehicle operators as needed to manage scheduled runs. At the time of the

review, El Lift had four full-time agents and one agent who worked 36 hours per week. Weekly schedules for the agents are shown in Section 5, Figure 5.1.

On weekdays there is at least one agent working from 6 a.m. to 8 p.m. Prior to 6 a.m. and after 8 p.m., there are no El Lift agents scheduled to work. El Lift runs begin before 4:30 a.m. on most weekdays and may extend beyond 10 p.m. (depending on the last scheduled pickup). During the early morning and evening periods, El Lift drivers communicate with the El Metro fixed route dispatchers. From 8 a.m. to 5 p.m., there are multiple agents working.

On weekends, one dispatcher is on duty from 6 a.m. to 2 p.m., and a second dispatcher reports at noon and works until 8 p.m. This schedule allows for one dispatcher to be on duty throughout the day and for some overlap of dispatchers at the shift change to exchange information on the status of runs and any issues that may need to be followed.

On weekdays, there are typically 13-14 total runs scheduled and about 10-11 peak hour runs. On Saturdays, there are four total and peak runs. And on Sundays, there are three total and peak runs. At peak hours on weekdays, there are 2-4 agents that share dispatch duties for the 10-11 peak hour runs. On weekends there is one agent/dispatcher that handles the 3-4 peak hour runs. Even with shared responsibilities to book trips as well as dispatch runs, this level of staffing appears adequate. First-hand observations did not indicate delays in responses to driver radio requests, or other dispatch issues related to levels of staffing.

The team observed El Lift dispatch for several hours at various times throughout the week of October 22-26, 2012. The team observed that drivers were not radioing in to report when they were making pickups and drop-offs. Dispatchers also were not regularly polling drivers to get actual pickup and drop-off times. Instead, agents were managing runs by responding to driver requests for assistance, or by responding to rider calls reporting late pickups.

The lack of collection and recording of actual pickup and drop-off times resulted in “reactive” dispatching rather than “proactive” dispatching. The El Lift agents were not looking 1-2 hours out, identifying potential issues, and reassigning trips as needed to keep the service on time. The lack of recording of actual pickup and drop-off information throughout the day also affected the ability of the agents to identify slack time in the system if they needed to reassign trips to other runs, or when riders needed will-call return trips. If the agents did use the Trapeze system to identify possible scheduling options for trip reassignments of will-call returns, they were looking at the original vehicle schedules, created the day before. Since the agents were not entering actual pickup and drop-off times throughout the day, Trapeze was not able to provide the actual status of vehicle runs, and the agents did not have information on the true schedule slack times.

Because agents/dispatchers were not proactively dispatching, they were not using the “Dispatch Screen,” a tool provided by in the Trapeze system that automatically scans all runs, identifies trips and runs that are projected to be late, and displays these on a single screen. Instead, dispatchers were always working in the “Trip Administration” screen, which displays one of two specific runs at a time.

The El Lift agents and supervisor noted that drivers have been encouraged to radio in each pickup and drop-off. They said that this has been the subject of several meetings. However, drivers had not adopted this practice.

Recommendations: El Lift agents should poll drivers periodically (e.g., at least once per hour) to collect actual pickup and drop-off information. They should enter this information into the Trapeze system so that the system can keep estimated arrival times (ETAs) updated and show the actual status of runs throughout the day. To do this effectively, El Lift should designate one agent as the lead dispatcher at any given time. This lead dispatcher should also then use the updated run status information to proactively manage runs—i.e., regularly scan runs 1 to 2 hours into the future and identify and correct any predicted problems.

Also, this lead El Lift dispatcher should use the Trapeze Dispatch Screen to proactively dispatch.

El Metro has indicated each driver manifest will include at least one time point. An El Lift agent will poll each driver daily. El Metro also indicated that it will conduct hourly polling of drivers after the installation of new software and mobile data terminals.

The team observed the handling of no-shows. It appeared that drivers were diligent in always radioing in when a rider did not board as scheduled. An agent then attempted to call the rider if there was a telephone number on file for the pickup location. If she could not contact the rider, or if the rider indicated he/she was not taking the trip (“Cancel at Door”), the agent authorized a no-show. Agents were also diligent in making sure that drivers waited at least 5 minutes before no-showing riders. In some cases, if there was slack time in the schedule, agents asked drivers to wait more than 5 minutes.

However, agents did not use the “Trip Tracker Notes” feature in Trapeze to document the handling of no-shows. Tracker Notes become very important for responding to rider challenges of no-shows. Tracker Notes are also very important for documenting why no-shows might be appropriate when vehicles arrive and leave early. For example, a vehicle may arrive 25 minutes before the scheduled pickup time (10 minutes before the start of the on-time window). Contact may be made with the rider (either directly with the driver or through an agent who may be notifying the rider that the vehicle is early and asking if the rider is able to go a little early). If the rider indicated that he/she has decided not to make the trip (without any pressure and even if the vehicle waited until the on-time window), this would appropriately be considered a Cancel at the Door. Without the Tracker Notes that document the communication with the rider, future investigations of this incident would simply show that the vehicle arrived and left early, which would be considered a missed trip rather than a no-show.

Recommendations: El Lift agents should document actions taken and any contacts with riders in Tracker Notes whenever they authorize a no-show. Documentation should include: when the vehicle arrived, and actions taken (by agent or driver) to contact the rider, any communications with the rider (or others), and the time an agent authorized the no-show.

El Metro should establish a definition for an El Lift missed trip, as well as a standard for an acceptable level of missed trips.

El Metro has indicated that El Lift agents are following new procedures to document their actions before declaring a rider no-show and recording their activities in the software system.

The team also observed the agents’ handling of will-call return trips. As mentioned previously, agents do not enter these trips into the system when the rider initially calls to make the trip requests. Instead, riders call and request return trips when they are ready. When these calls come in, an agent first searches the existing schedules to identify possible scheduling options. The agent first enters a requested pickup time into the system that is 30 minutes from the time of the call, then asks Trapeze to search for a vehicle run. If Trapeze does not find an appropriate run, the agent enters a new requested time that is 60 minutes out; if necessary, searches again 90 minutes out. If Trapeze does not identify a potential vehicle run after several searches, the agent typically makes a radio “all call” to see if there are any drivers who can assist with the trip. In several cases, the team observed that agents had difficulty getting the Trapeze system to identify available scheduling options. As noted above, this could be happening because the system is looking at schedules as they were created the day before and not at actual runs based on updated, actual pickup and drop-off information.

The team observed the agents’ handling of rider “Where’s my ride?” calls. Agents performed their job properly. They consistently contacted drivers when vehicles were running late, received updated information from drivers, and gave riders reasonable estimates of pickup times. In some cases, if riders were calling within the on-time window, but the vehicle was not yet late, agents simply told the rider that the vehicle was “on its way,” which is appropriate.

The Rider’s Guide (page 10) has a policy concerning riders who use a PCA. “If a vehicle is dispatched for a passenger who utilizes a PCA and the PCA is not available, and it is determined that the PCA is no longer required, documentation to this effect may be required by El Metro.” This policy is not compliant with the DOT ADA Regulations. There are some riders who may need a PCA for certain trips but not all—e.g., a PCA may be needed at the rider’s destination but not necessarily for the actual travelling. El Metro may request that a rider indicate that he/she may need a PCA (and reserve space on the vehicle for the PCA), but cannot require that a rider always travel with a PCA.

Recommendation: El Metro should revise its policy to request that a rider who uses a PCA indicate on a trip-by-trip basis whether the PCA will be travelling with the rider.

7.3 NO-SHOWS AND LATE CANCELLATIONS

The team reviewed El Metro’s definitions of no-shows and late cancellations to ensure that they were appropriate and consistent with DOT ADA regulatory requirements. The team also examined a sample of no-shows to make sure that El Lift agents were correctly recording and coding them.

According to the Rider’s Guide (page 11), no-shows are defined as incidents where passengers fail to board and the vehicle has waited at least 5 minutes within the 30-minute ready-time window. Late cancellations are defined as cancellations that occur less than 2 hours before the start of the ready-time window. Cancels at the door, also considered in possible no-show suspensions, are defined as the term implies (although the definition does not mention that the vehicle must arrive within the ready-time window). These definitions are appropriate and consistent with ADA regulations and FTA guidance.

The team checked a sample of 17 no-shows recorded September 17–September 22, 2012. The team looked at original driver manifests and compared arrival and departure times of the vehicles to scheduled pickup times. The objective of the review was to determine if vehicles arrived and waited at least 5 minutes in the on-time window; and if not, whether there were any “Trip Tracker Notes” entered in Trapeze by an agent to document the no-shows. Table 7.2 provides a summary of information for these 17 no-shows.

Table 7.2 – Summary of Information for 17 Randomly Selected No-Shows

Date (all Sept)	Run #	Scheduled Pickup Time	Actual Arrive/Depart Times	Tracker Notes? (Y/N)	Comments
17	1	4:45 p.m.	4:49/4:55	N	OK
17	1	10:30 a.m.	10:22	N	Probably OK, but no Depart Time
17	8	10:30 a.m.	10:30	N	Probably OK, but no Depart Time
17	10	5 p.m.	5:00	N	Probably OK, but no Depart Time
18	1	7:15 a.m.	7:02	N	Probably OK, but no Depart Time
18	10	11 a.m.	11:05	N	Probably OK, but no Depart Time
21	1	4:45 p.m.	4:50	N	Probably OK, but no Depart Time
21	1	10:51 a.m.	10:20	N	Probably OK, but no Depart Time
21	3	12 n	11:50/11:55	N	OK
21	8	10:30 a.m.	10:20	N	Probably OK, but no Depart Time
21	12	3 p.m.	3:12	N	Probably OK, but no Depart Time
21	13	4:15 p.m.	3:40	N	Available data suggests a missed trip
21	13	5 p.m.	4:20	N	OK: record shows was will-call return
21	14	8:30 a.m.	8:00/8:18	N	Probably OK, but waited 3 minutes in window
21	14	10:30 a.m.	10:00	N	Available data suggests a missed trip
21	14	10:45 a.m.	10:00	N	OK: other run info indicated Cancel at door
22	13	4:30 p.m.	4:25	N	Probably OK, but no Depart Time

In two cases, the times on the manifests indicated that vehicles arrived within the ready-time window and waited the required 5 minutes. In one case, the vehicle arrived 40 minutes early, but other information taken from the trip record indicated it was a will-call return, so an early arrival was okay. In one case, the vehicle arrived 45 minutes early, but other information from the run manifest suggested it was a “cancel at the door.” In 11 cases, the vehicle arrived within the window and the no-show was probably appropriate, but the driver did not record a departure time, so one cannot determine the actual wait time within the window. And in two cases, the vehicle arrived early, no departure time was recorded, and there were no Trip Tracker Notes or any other information to indicate that the vehicle waited until and at least 5 minutes in the window. In these last two cases, the available information on record suggests that these should have been recorded as missed trips rather than no-shows, i.e., the responsibility of El Lift rather than the passenger. The review also found that El Lift agents did not enter Trip Tracker Notes for any of the 17 no-shows.

Recommendations: El Lift agents should document no-shows using the “Trip Tracker Notes” feature in Trapeze. Documentation should include: when the vehicle arrived, and actions taken to contact the rider, any communications with the rider (or others), and the time the no-show was authorized.

Also, El Lift drivers should more consistently record both arrival and departure times for all pickups.

El Metro has indicated that El Lift agents are following new procedures to document their actions before declaring a rider no-show and recording their activities in the software system.

El Metro has indicated that it has issued a memo reminding drivers to record both arrival and departure times for all pickups.

El Metro has a policy (Rider’s Guide, page 6) that states that “return trips will be cancelled if you No-Show any part of your trip itinerary.” FTA has judged this to be an improper practice. If an El Lift rider is a no-show, El Metro must confirm with the rider that he/she does not want subsequent trips scheduled for that day before cancelling these trips.

Recommendation: El Metro should revise its existing policy concerning automatically cancelling return trips if a rider is a no-show for the initial trip. An agent should confirm that a rider does not want to take the subsequent trips for that day. Otherwise, El Lift should assume that the rider would take the subsequent requested trips.

El Metro has indicated that “El Lift will only honor subsequent trips if the customer calls and [confirms] within two hours; a no-show will terminate the whole service schedule.”

Note that this does not comply with the DOT regulations.

7.4 TRIP CAPS, WAIT LISTS, AND TRIP DENIALS

The DOT ADA regulations prohibit “capacity constraints” in ADA paratransit operations. The regulations identify several practices as types of capacity constraints, including trip caps, wait lists, and a substantial number of trip denials. A trip denial includes a request for service that cannot be accommodated at all, as well as a trip that is scheduled more than 1 hour from the requested time. Guidance offered by FTA in recent grantee compliance reviews on the interpretation of a “substantial number of trip denials” indicates that systems should have a goal of zero denials and should plan and budget to meet 100 percent of the expected demand for ADA paratransit service.

As part of the review, the team examined El Metro policies and practices related to trip caps, wait lists, and trip denials.

TRIP CAPS

The Rider’s Guide (page 6) states “A limit of four trips per day will be allowed; which will be the (1) pickup, (2) trip request, (3) trip request and (4) trip back home, or two morning pickups and two afternoon pickups.” El Lift agents, confirmed that they enforce this policy in daily operations.

Recommendation: El Metro should revise its current policy that limits riders to a maximum of four one-way trips per day. There should be no limit on the number of trips ADA paratransit eligible riders can request.

WAIT LISTS

The team observed that El Lift agents offer to put riders on a “standby” list if the agents cannot find a scheduling option for the trips the riders are requesting. The agents tell the riders that there could be cancellations, and if it is possible to schedule their requested trip later on, an agent will call them. The agents try to make it clear to the riders that if they choose to go on the standby list they are not guaranteed rides. The standby list is a “waiting list.” The team observed that most riders opt not to be standbys, but some do. The team also observed that when agents place rider on the standby list, agents typically do not code these trip requests as denials in the Trapeze system.

During the October 23, 2012 public meeting, several individuals stated that they are placed on the standby list but “they never call back.” These statements suggest that they thought that if they were on the standby list they would get a call back, whether or not their trip became available.

Recommendations: Once El Metro has expanded El Lift capacity enough to meet all trip requests, it should eliminate the use of a standby list. Until trip denials are eliminated, having a standby list is useful, since it reminds El Lift agents to try to schedule the trip at a later time if possible.

While the standby option is still in use, agents should make clear that riders will not get a call if the requested trip cannot be scheduled. Agents may also suggest that riders who opt to be standbys call the day before the day of service to check to see if their trips have been scheduled.

El Metro has indicated that El Lift will not have a wait list.

TRIP DENIALS

The team reviewed the El Lift data on trip denials. Team members then derived an independent estimate of trip denials via two sources of data: live observations of El Lift agents as they took trip requests; and listening to the recordings for all incoming telephone calls to El Lift agents for a sample day.

REPORTED TRIP DENIALS

Table 7.3 shows selected El Lift operating data for the period January to September 2012. The denial rate is based on denials as a percent of all trips requested. Based on this reported data, El Lift denial rate for this period was 0.4 percent.

Table 7.3 – Selected El Lift Service Statistics, January-September 2012

Month	Trips Requested	Trips Cancelled	Trips Provided	No-Shows	Missed Trips	Trip Denials	% Denials
Jan 2012	4,427*	675*	3,672	66	0	12*	0.3%
Feb	4,263	558	3,609	83	2	11	0.3%
Mar	4,528	775	3,654	79	4	24	0.5%
Apr	4,471	712	3,646	74	2	37	0.8%
May	4,559	675	3,780	81	3	20	0.4%
Jun	4,025	574	3,326	97	6	22	0.5%
Jul	3,933	599	3,251	69	1	13	0.3%
Aug	4,381	651	3,622	95	8	5	0.1%
Sep.	4,395	685	3,597	100	8	5	0.1%
Total	38,982*	5,903*	32,149	744	34	152*	0.4%

*Estimated

FIRST-HAND OBSERVATIONS OF TRIP RESERVATIONS

Members of the team observed the reservations process for several hours on various days from October 22-25, 2012. Team members sat with agents and recorded the number of trip requests and whether they were scheduled or denied. If agents scheduled the requested trips, team members also recorded the pickup times requested as well as the times the trips were finally scheduled. Trips scheduled more than one hour from the requested times were considered denials.

During the review week, the team observed a total of 114 trip requests. While the team did not observe any outright denials of trip requests, two trip requests were scheduled more than 1 hour from the requested times, which constitute denials according to the DOT ADA regulations.

REVIEW OF TELEPHONE CALL RECORDINGS

The team also listened to recordings of the El Lift reservations line for a single day: Thursday, September 20, 2012. There were a total of 180 incoming calls on that day. A total of 120 one-way trips were requested in these

calls (many calls were from riders not requesting trips, but confirming trip requests or checking on the status of scheduled rides). Of these, El Lift agents scheduled 112 trips within 1 hour of the requested time. Another two trip requests were scheduled more than 1 hour from the requested time (a denial as defined by the DOT regulations). Six trip requests were not scheduled and denied outright. Note that if the first leg of trip was denied outright and there was then no attempt to schedule the return trip, the team counted this as 2 one-way trip denials. This yields a denial rate of 6.7 percent (8 of 120).

The team recorded the dates of the trips being requested: to see the distribution of days ahead requested; and to determine if the denial rate varied by the number of days in advance of the trip request. Table 7.4 summarizes this analysis.

Table 7.4 – Trip Requests and Denials, September 20, 2012

Days in Advance Trips Requested	# of Trips Requested	% of Trips Requested	# of Trips Scheduled	# Denied	% Requests Denied
1	7	5.8	3	4	57.1
2	4	3.3	2	2	50.0
3	0	0	0	0	0.0
4	13	10.8	11	2	15.4
5	18	15.0	18	0	0.0
6	24	20.0	24	0	0.0
7	46	38.3	46	0	0.0
8	2	1.7	2	0	0.0
Unknown*	6	5.0	0	0	0.0
Total	120	100%	112	8	6.7%

*For 6 trips requested, the dates of the trips (and therefore the number of days in advance) were not clearly stated in the calls. 2 trip requests were accepted more than 7 days in advance.

As shown, trips requested 5 or more days in advance comprise 75 percent of the trip requests. All of these were scheduled without any denials. However, as the day of service got closer, the chance of being denied increased. Two of the 13 trips requested 4 days in advance were denied (15.4 percent). Two of the four trips requested 2 days in advance were denied (50 percent). And four of the seven trips requested 1 day in advance were denied (57.1 percent). It is also interesting to note that relatively few trips were requested less than 4 days in advance—likely because riders have become aware of the need to call far in advance to be sure of getting rides.

Recommendations: El Metro is not meeting all demand for El Lift service. Overall, the denial rate is about 7 percent. Furthermore, the chance of El Lift meeting a rider’s trip request diminishes significantly if the rider does not call at least five days in advance. El Metro should increase El Lift capacity to eliminate trip denials and to allow riders to call 1 day in advance and still be guaranteed service.

A conservative and efficient way to build the needed capacity would be to add runs only when needed. Agents could accept all trip requests and enter them into Trapeze. If an agent cannot identify a scheduling solution for a given trip at the time of the initial request, she can leave this trip as “Unscheduled” in the system. The agent could tell the riders that his/her trip has been accepted, without saying it is unscheduled (this is important for meeting the regulatory requirements, since saying these trips are unscheduled would be a kind of waiting list).

Riders should have the understanding that they will receive the trip that they requested at the time requested. Then, depending on the number of unscheduled trips each day, El Metro can create additional runs, and/or it can extend existing runs to serve all of the unscheduled trips. In this way, El Metro would not need to establish runs that it may or may not need. Over time, if it becomes clear that it always needs additional El Lift runs on certain days, El Metro can add these runs permanently.

The above approach requires adequate spare (“extraboard”) drivers and adequate spare vehicles. Based on discussions with El Lift staff, both appear to be available.

Weekend capacity—particularly Saturday capacity—appears to be low. In many cities, typically Saturday demand is about 50 percent of weekday demand, and Sunday demand is 30-40 percent of weekday demand. Current El Lift service has 13-14 weekday runs, but only four Saturday runs (30 percent of weekdays), and only three Sunday runs (21-23 percent of weekdays).

7.5 RUN COVERAGE

When asked about run coverage, El Lift agents and managers indicated that typically all vehicle pullouts take place as scheduled. The team looked at the sample week of September 16-22, 2012 to confirm that there were adequate vehicles and drivers to operate all scheduled El Lift runs. The number of runs scheduled was compared to the actual number of runs that El Metro placed in service. Table 7.5 shows the results of this review. As shown, El Lift agents scheduled a total of 77 runs that week. This included 76 regular runs plus one add-on run. All 77 runs ran as scheduled. The analysis suggests that El Lift has adequate vehicle and driver resources to meet scheduled pullout each day. Sharing spare drivers with fixed route helps to ensure that there are always drivers to cover unscheduled call outs. With a total fleet of 18 vehicles and a peak pullout requirement of 10-11, there are sufficient backup vehicles to meet scheduled pullout.

Table 7.5 – Scheduled Versus Operated El Lift Runs, September 16-22, 2012

Day/Date	# of Runs Scheduled	# of Runs Operated
Sunday, Sept 16	3	3
Monday, Sept 17	14	14
Tuesday, Sept 18	14	14
Wednesday, Sept 19	14 (13 regular plus one add-on)	14
Thursday, Sept 20	14	14
Friday, Sept 21	14	14
Saturday, Sept 22	4	4
Total	77	77

7.6 DRIVER INTERVIEWS

During the site visit, the team interviewed 10 El Lift drivers. The average tenure of the drivers interviewed was 16 years; only one driver had been with El Lift for fewer than 10 years, and three had been employed there 20 or more years.

The interviews covered:

- Initial and refresher training
- What drivers considered the most difficult part of the job
- Whether the schedules they were expected to perform were workable
- How often they ran late, and whether they found it necessary to run early to stay on time
- Level of dispatch support provided
- Their understanding of operating procedures (particularly the on-time performance window, no-show procedures, and rider assistance policies)
- Whether times on the manifests were consistent with times reported by riders
- Accuracy of special instructions on the manifests
- Whether riders seemed to understand the on-time pickup window
- Vehicle condition and repair

Seven of the 10 drivers said that they felt that the initial training they received was good and did prepare them for the job. Only one indicated he had received adequate refresher training. Four drivers said that they “used to” receive refresher training, although that had not occurred in many years; one said it had been about 4 years since the last refresher training and another driver said it had been 8–10 years.

Eight of the ten drivers cited the schedule as the most difficult part of their job. Additionally, most of the drivers specifically said something to the effect of “I always have two to three pickups scheduled for the same time.” One driver said that he did not find the job difficult.

Similarly, when asked to describe the workability of the schedules as either “too tight, about right, or too loose,” all 10 drivers said the schedules were too tight. Six indicated that the schedules were *often* too tight. Two drivers said that there needed to be more time scheduled for travel time and another described the circuitous scheduling; having a pickup on one side of town, then a second on the opposite side of town, all within a short period of time.

Drivers were then asked how often they ran late (meaning beyond the 15-minute on-time window). The respondents seemed to be in agreement that running late was a daily occurrence, again referencing the tight schedules. One driver said that whether or not a route ran late depended on the driver; that each driver knows his schedule and clients and how best to maneuver pickups to stay on time. Echoing this, many of the drivers discussed the “judgment calls” they are required to make daily, in terms of which clients to pick up, and in which order, regardless of what the manifest says. They described being more concerned about the timeliness of their dialysis and medical patients than “mall trips.”

When asked about dispatcher assistance they receive on late trips, all those interviewed indicated that dispatch is generally not able to provide any help, probably due to lack of available vehicles. One driver said that he does not alert dispatch to his schedule and tries to recover throughout the day. Three drivers described putting out an “all-call” over the radio to see if other drivers were able to assist with passenger pickups.

All ten drivers interviewed were familiar with the 15-minute pickup window defining “on time.” Only one driver said that the majority of clients did not understand the on-time pickup window, and three said that some passengers understand. However, some said that drivers and passengers may not actually “like or comply” with the on-time pickup window. One driver described being told by dispatch to wait for certain “important” passengers, no matter how long the wait may be.

There appeared to be some differences among drivers for no-show procedures. Seven of the ten drivers said that if a person does not appear to be at the pickup location, they call dispatch and ask the agents to call the passenger on their home or cell phone. Two drivers said that, regardless of the wait time, they are told to “wait longer” for the passenger. One driver said that he leaves the no-show paper notice (“knocker”) on the door and reports the no-show on his manifest; another said that he tries to ring the doorbell to alert the passenger to his presence. This same driver said that if the passenger is not there, he “knows it’s a problem with the manifest and scheduling, not the passenger.”

Four of the 10 drivers indicated that they provide only curb-to-curb service. Two drivers described a safety meeting in which the “ADA guy” advised the drivers not to go beyond the curb or to touch people. Another driver described being nervous about liability should he go beyond the curb: e.g., being blamed for missing property, hurting a client. Two drivers said that their clients require more than curb-to-curb service, and that they do provide it. Three drivers said that they will provide extra assistance when it is needed by the passenger; one of those drivers estimated that extra assistance is required “at least 50 percent of the time.”

Seven drivers answered the question regarding whether they needed to run early to stay on time. Five out of those seven said “Yes,” and two said “No.” One of the drivers that said “No,” said that he didn’t feel right about asking his passengers to leave before their scheduled pickup time. The other driver said that he manipulates the sequence of pickups listed on the manifest to stay on time.

When asked whether times on the manifests were sometimes different from what riders said they were given, seven drivers said “yes” and three said “sometimes.” Many followed up with comments such as “it happens a lot,” or “it could be 15 minutes different or it could be the wrong day.” One driver said it happened so frequently that he wondered whether the reservation agents were, in an effort to allow for more trips, changing scheduled pickup times after a different time had been agreed upon with the passenger.

Drivers were also asked about the accuracy of information on the manifests about special pickup instructions or rider needs; there was much variation among the responses received. Two drivers said the information was accurate, four drivers said the information was not accurate, and two drivers reported the information was only

sometimes accurate. One driver said that most of the additional information on the manifest was out-of-date. There was a general consensus that additional information would be helpful, especially when the passengers live in a large apartment complex or in a back or side apartment.

The consensus among drivers was that the El Lift vehicles are in good repair: eight drivers described the condition as “good,” and two drivers described the vehicles as “OK.” A few drivers noted that the paratransit vehicles are in much better condition than the fixed route vehicles. One of the drivers that described the vehicles as “OK,” said, “The vehicles are at about 70 percent of their useful life. Sometimes I have to maneuver to keep my vehicle safe.” While most of the drivers said that maintenance requests were dealt with in a timely manner, three of the drivers noted that they have to go directly to the El Metro maintenance department to get their vehicles fixed; otherwise nothing would get done.

Finally, at the end of the interviews, drivers were asked for “other issues” and general input. Building on comments received during the interviews, a theme of consistency emerged. The drivers are generally confused as to what the current El Lift policies and procedures are. They expressed a willingness to adhere to the policies, once those policies become clearly defined. Further, they feel that passengers will be more compliant if policies are clearly communicated to the public and enforced in a uniform manner.

Other comments received included:

- “Need more vehicles” (three drivers)
- Dispatchers should do ride-alongs so they understand the on-the-street El Lift drivers
- Better dispatcher training
- Better communication/coordination with fixed route service

7.7 ON-TIME PERFORMANCE

REPORTED ON-TIME PERFORMANCE

El Metro had not been monitoring the on-time performance of El Lift on a regular basis prior to change in management in later summer 2012. There are reports available from the Trapeze software that present daily and monthly on-time performance. These reports make use of the scheduled pickup and drop-off times, combined with the actual pickup and drop-off times, as written by drivers and subsequently entered into the software by El Lift agents. Table 7.6 presents the calculated on-time performance for the first 9 months of 2012.

Table 7.6 – Reported El Lift On-Time Performance: 2012

Month	Pickups			Drop-offs		
	All Trips	Late	On-time %	Trips	Late	On-time %
Jan 2012	3565	209	94.1%	382	165	56.8%
Feb	3535	203	94.3%	228	111	51.3%
Mar	3564	177	95.0%	227	110	51.5%
Apr	3605	209	94.2%	334	161	51.8%
May	3728	172	95.4%	382	165	56.8%
June	3257	258	92.1%	218	76	65.1%
July	3216	200	93.8%	213	66	69.0%
Aug	3646	328	91.0%	316	119	62.3%
Sept	3689	305	91.7%	251	103	59.0%
2012 (9 months)	31,805	2,061	93.5%	2,551	1,076	57.8%

The team identified flaws with the reported on-time performance. First, the on-time pickup window used by Trapeze is -25 minutes to +25 minutes (-25/+25). This does not match the policy of El Lift: a window of -15/+15. Second, the on-time drop-off window used by Trapeze is -15/+15. While El Lift has no stated drop-off window, it is poor practice to have a drop-off window that extends later than the appointment time. At latest, the late end of a drop-off window should be 0 minutes—otherwise, *the policy would be allowing drop-offs after the appointment time.*

As a result of these flaws, the statistics generated by Trapeze do not reflect actual performance. Furthermore, there is an unusually low portion of trips with a stated drop-off time. Typically, a paratransit operation has 40-50 percent of its trips with requested drop-off times. For El Lift, only 8 percent of the trips have requested drop-off times. El Lift agents said that they have not entered the appointment times into Trapeze for many subscription trips, such as for dialysis, workshops, or senior centers, because the agents and the drivers “know” the appointment time. As a result, these appointment times do not appear on the driver manifests and Trapeze is not able to compute whether the drop-offs are on time (even with the proper window).

Recommendations: El Metro should adjust the parameters in Trapeze so that the reports for on-time performance—both pickups and drop-offs—reflect the correct on-time windows.

El Metro managers should monitor on-time performance on a regular basis. On-time performance is itself a key measure of service quality. It is also an indicator of other potential service issues.

El Metro has indicated that the El Lift manager will “screen incoming manifests to provide immediate feedback to drivers.”

CALCULATED ON-TIME PERFORMANCE FOR SAMPLE WEEK

The team performed an independent analysis of on-time performance. The sample data came from driver manifests for the sample week of September 16-22, 2102. The sample set consisted of roughly every sixth trip on the manifests for that week. The data included pickup arrival times, drop-off times (all recorded by the drivers), scheduled pickup times, and appointment time (if available), along with route information. The total sample comprised 159 El Lift trips.

Of the trips in the sample, 15 trips did not have a scheduled pickup time—they were either will-calls or same-day requests. Table 7.7 shows the analysis of on-time pickup performance for the remaining 144 sampled trips. Counting all pickups that were in the window or early, on-time performance was 92.4 percent. This is in line with METRO’s reported pickup performance for September 2012 (91.7 percent: though as discussed above, the reported performance is not reliable). If one counts only pickups within the window of -15/+15, then on-time performance for the sampled trips was 70.1 percent; 22.2 percent of the pickups took place before the beginning of the window.

Table 7.7 – On-Time Pickup Performance: September 16-22, 2012

Sample (excludes will-calls and same-day requests)		Number	Percent
		144	100.0
Pickups in window (-15/+15 minutes)		101	70.1
Pickups in window or early		133	92.4
All early pickups			
	1–15 minutes	18	12.5
	16–30 minutes	11	7.6
	> 30 minutes	3	2.1
All late pickups		11	7.6
	1–15 minutes	10	6.9
	16–30 minutes	0	0.0
	> 30 minutes	1	0.7
	> 60 minutes	0	0.0

As discussed earlier in this section of the Technical Memo, a very small portion of the trips have a requested drop-off (appointment) time in Trapeze, even if many more trips have an appointment time in practice. Of the sample of 159 trips, only seven had a stated appointment time. Therefore, to get a larger sample of trips to estimate on-time performance for drop-offs, an El Lift agent reviewed a single day’s manifests (Monday, September 17, 2012) and identified all trips for that day that had an appointment time—whether or not that time was printed on the driver manifest. The agent identified a total of 78 trips with appointment times (nine of these 78 had appointment times printed on the manifest).

The on-time drop-off performance for the sampled trips is presented in Table 7.8. The analysis shows that 78.2 percent of the sampled trips with appointment times had on-time drop-offs, while 21.8 percent arrived after the appointment time. In other words, roughly one of every five trips with an appointment arrived late. This performance is better than the drop-off performance captured in El Lift’s Trapeze reports. However, this proportion of late drop-offs is still an operational pattern or practice that may discourage El Lift riders from using the service.

Recommendation: Improve on-time performance for trips with requested drop-off times. Crucial to achieving this is recording the requested drop-off times and including these times on driver manifests, as well as the Trapeze dispatch screen.

El Metro has indicated that it has issued a memo reminding drivers to record both arrival and departure times for all pickups.

Table 7.8 – On-Time Drop-off Performance (September 17, 2012)

Sample	Number	Percent
	78	100.0
All on-time trips (before appointment time)	61	78.2
1–15 minutes early	11	14.1
16–30–minutes early	19	24.4
31–60 minutes early	27	34.6
> 60 minutes early	4	5.1
All late drop-offs	17	21.8
1–15 minutes	10	12.8
16–30–minutes	6	7.7
> 30–minutes	1	1.3

In addition, a significant proportion of trips with an appointment time had a very early drop-off. Forty percent of all trips in the sample (31 of 78) had arrival times more than 30 minutes ahead of the requested drop-off time. This may be a concern for riders who are being dropped off at a facility (e.g., workshop, medical office) that may not be open so far in advance of the rider’s appointment time.

Recommendation: For trips with a requested drop-off time, El Metro should set an on-time drop-off window from 30 minutes before the requested time to 0 minutes (-30/0). This will let agents and drivers know when a rider should be dropped off: on time but not too early.

7.8 ON-BOARD TRAVEL TIME

According to El Metro managers, the goal for maximum travel time for El Lift service is 60 minutes. However, El Metro has no standard for an acceptable portion of trips that exceed 60 minutes. At the time of the team’s site visit, El Metro had not been actively monitoring travel time.

The team tabulated all trips on the El Lift manifests for the week of September 16-22, 2012. Out of approximately 1,000 trips, there were 49 trips of 45 minutes or longer (4.9 percent), measured from pickup departure time to drop-off arrival time. If the driver did not record the pickup departure time, the pickup arrival time was used instead to calculate travel time.

- 20 trips were 60 minutes or longer (2 percent)
- 5 trips were 75 minutes or longer (0.5 percent)
- 2 trips were 90 minutes or longer
- the longest trip was 103 minutes

For this sample week, the team separately analyzed the 159 trips used in the on-time performance analysis to approximate a distribution of El Lift travel times. Based on this sample, the average (mean) travel time was 22 minutes and the median travel time was 17 minutes. Nearly 80 percent of the trips were 30 minutes or less.

The team selected a sample of 15 of the trips greater than 60 minutes for comparison with the time that the trip would take on El Metro fixed route buses. Most transit systems consider the paratransit trip time to be comparable to the fixed route time if it is no more than 20 minutes longer than the time that the trip would take on fixed route services, including the walking time to and from the bus stops.

The team performed the following analysis for each of the 15 long trips:

- Measured the walking distance to the nearest bus stop at both ends of the trip using Google maps; the walking time was calculated based on a walking speed of 20 minutes per mile (3 miles per hour).
- Assumed 5 minutes waiting time at the originating bus stop, and included time at the Transit Center for transfers to a second bus when needed.
- Used El Metro bus schedules to estimate the time on each fixed route bus.
- Compared the total fixed route time (#1 plus #2 plus #3) with the actual paratransit time from the El Lift manifests.

The results of this analysis showed that of the 15 trips, nine would have taken longer by a person using El Metro fixed route service. The fixed route time differences ranged from 9 to 73 minutes longer than paratransit time (13 minutes longer on average). Table 7.9 summarizes the long trip analysis.

Of the 15 trips, six would have been shorter on the fixed route itinerary. These time differences ranged from 1 to 23 minutes shorter on the fixed route, compared to the El Lift travel times (7 minute shorter on average). Only one paratransit trip was more than 20 minutes longer than the corresponding fixed route trip.

In addition to this analysis, all trips from the sample week of 45 minutes or more were scrutinized to see if there was any systematic practice that would lead to excessively long trip times for particular riders. No such pattern was observed.

Overall, the analysis indicates that long times on board El Lift vehicles are relatively rare and that long trip times are not an issue that needs improvement.

Recommendations: El Metro should establish a standard for an acceptable proportion of “long trips” for El Lift service.

El Metro should also regularly monitor the proportion of long trips and conduct an analysis comparing El Lift travel times to travel times of comparable fixed route trips. El Metro should also review long trips to ensure that there is no pattern (e.g., origin or destination, geographic region, time of day, day of week) that would disproportionately affect certain riders.

Table 7.9 – Comparison of Travel Time on El Lift versus Fixed Route for Selected Trips, September 16-22, 2012

Date	Paratransit Trip		Comparable Fixed Route Trip						Total Trip Time (mins)	Para – FR Time	
	Pickup Address	Drop-off Address	Pickup Time	Drop-off Time	Trip Time (mins)	Bus Routes	Bus 1 Travel Time	Bus 2 Travel Time			Walk, Wait & Transfer Time
Sept 17	6800 McPherson Av 1100 Sherman St		2:25 p.m.	3:40 p.m.	75	3, 2A	40	10	39	89	-14
Sept 17	4200 Bob Bullock 100 Water St		4:40 p.m.	6:10 p.m.	90	11, 9	35	5	27	67	23
Sept 17	5500 S Zapata Hwy 3200 Flores St		6:40 p.m.	7:45 p.m.	65	14, 2A	50	10	14	74	-9
Sept 21	700 Alta Vista Dr 800 Chalan St		2:35 p.m.	3:35 p.m.	60	3, 17	37	41	55	133	-73
Sept 17	1200 Truman Loop 2300 Saunders		2:30 p.m.	3:52 p.m.	82	19, 8A	47	20	14	81	1
Sept 17	3100 Saltillo St 2300 Saunders		2:40 p.m.	3:52 p.m.	72	10, 8A	24	20	24	68	4
Sept 20	5200 University Blvd 1700 E Lane St		3:03 p.m.	4:07 p.m.	64	11	20	(none)	35	55	9
Sept 20	4200 Bob Bullock 2400 Cortez St		2:15 p.m.	3:25 p.m.	70	11, 9	30	15	40	85	-15
Sept 20	1200 Malinche 500 Zoque Dr		2:29 p.m.	3:50 p.m.	81	19, 17	15	43	45	103	-22
Sept 21	2300 Los Pinos Dr 200 W Hillside Rd		7:46 a.m.	8:59 a.m.	73	14, 2B	35	21	33	89	-16
Sept 21	200 W Hillside Rd 2300 Los Pinos Dr		2:37 p.m.	4:20 p.m.	103	2B, 14	33	37	63	133	-30
Sept 21	4600 Ben-Cha Rd 700 Wolf Creek Dr		7:00 p.m.	8:30 p.m.	90	19, 17	18	42	72	132	-42
Sept 21	4600 Ben-Cha Rd 3200 Juarez Ave		7:00 p.m.	8:15 p.m.	75	19, 2A	18	10	60	88	-13
Sept 18	2300 Sanchez St 2300 Saunders		8:57 a.m.	10:08 a.m.	71	15, 8A	5	20	30	55	16
Sept 19	5600 Cielito Lindo Blvd 800 Guadalupe		2:25 p.m.	3:40 p.m.	72	14	48	(none)	11	59	13
Average					76		30	20	37	87	-11

Note: street addresses rounded to nearest 100 block

8 RESOURCES

As with Telephone Access and Service Performance, Section 27.133 (f) of the DOT ADA regulations (Capacity Constraints) recognizes that service quality can constitute a capacity constraint that limits the availability of service to paratransit-eligible riders. Consequently, the team examined the resources made available by El Metro to provide ADA complementary paratransit service. This information included:

- Consumer input on driver performance and vehicle condition
- Input from drivers on training and vehicle condition
- Information on the vehicle fleet
- Number of drivers and tenure/turnover
- Availability of vehicles and drivers to cover scheduled runs
- Operating budget for the service and the process used to estimate funding needs

The team also compared the paratransit ridership in the El Metro service area with ridership in other systems using a national paratransit demand model.

8.1 CONSUMER INPUT

None of the rider complaints received by El Metro from January to September 2012 pertained directly to El Lift resources.

During the October 2012 public hearing, one attendee commented that El Lift did not have enough vans or drivers to meet the demand. One rider suggested that the dispatchers are overworked. In a telephone interview, a social worker at a dialysis center said that there was no more capacity for morning El Lift trips.

8.2 VEHICLE FLEET

VEHICLE AGE AND CONDITION

El Lift has a total fleet of 18 vehicles, all body on chassis small vans, Chevrolet Model Year 2009. They were all began revenue service in October 2009. They have three wheelchair positions and maximum ambulatory seating of 7 (with or without the wheelchair positions occupied). The average odometer reading of the vans (as of late 2012) was 66 thousand miles, with most over 60 thousand miles.

Figure 8.1 presents a typical El Lift van.



Figure 8-1 Typical El Lift Van

VEHICLE AVAILABILITY AND SPARE RATIOS

With a peak pullout of 11 runs, vehicle availability has not been an issue for El Lift. With a fleet of 18 vans, the ratio of fleet to peak needs is 164 percent—well beyond the industry standard of 115 to 120 percent. For the sample week analyzed by the team, El Metro always had a sufficient number of vehicles to provide El Lift service.

As discussed in Section 6, the consensus among drivers was that the El Lift vehicles are in good repair. While most of the drivers said that maintenance requests were dealt with in a timely manner, three of the drivers noted that they have to go directly to the El Metro maintenance department to get their vehicles fixed; otherwise nothing would get done.

8.3 STAFFING AND DRIVER TRAINING

All El Metro drivers belong to the same labor union and have the same wage and benefit scale. At each pick, drivers can move between fixed route and El Lift service. As of October 2012, there were 15 drivers assigned to El Lift service. With peak service of 11 El Lift runs, this is sufficient number of drivers. If there were a need for additional El Lift drivers, backup drivers on the fixed route side could cover a run.

The El Lift drivers, on average, have well above average experience for a paratransit operation. As of October 2012, their average (mean) tenure with El Metro was over 21 years. The El Lift driver with the shortest tenure had over 12 years with El Metro.

Similarly, the average tenure of 13 years for the El Lift agents is well above average for a paratransit operation.

TRAINING AND EXPERIENCE

As discussed in Section 6, seven of the 10 drivers said that they felt that the initial training they received was good and did prepare them for the job. El Metro drivers receive training for both fixed route and El Lift service, so all drivers are prepared to provide El Lift service.

Only one driver indicated he had received adequate refresher training. Four drivers said that they “used to” receive refresher training, although that had not occurred in many years.

The agents have a great familiarity with El Lift service, the Laredo service area, and most of the riders who use the service. It is a small enough operation that the personal touch plays an important role in meeting the needs of the riders. The personal and informal way of operating can be appropriate and works for most occasions. On an infrequent occasion, this can be a drawback, as rider criticism can become personal (for both agents and drivers).

As cited in Section 7, the informality can hinder better service and monitoring. Very few of the trips with appointment times (“going” trips) have their appointments entered into Trapeze. The agents said that “everyone knows” what the appointment times are for many of the dialysis, senior center, and workshop trips. This is likely true in most cases, given the tenure of the agents and drivers. However, sometimes the drivers may be unfamiliar with a particular site and/or rider. This may lead to late drop-offs without the driver without his/her knowing. And as also mentioned in Section 7, El Metro cannot easily monitor and track performance for on-time drop-offs: an important measure of service quality.

8.4 RUN COVERAGE

As noted in Section 7, of the 77 vehicle runs for El Lift during the sample week (September 16-22, 2012), all operated as planned. El Lift has a fleet of 18 vans for its 11 peak runs. El Lift shares its pool of spare drivers with the fixed route service. As a result, El Lift has the backup capacity to cover for driver absences and vehicle breakdowns.

8.5 OTHER RESOURCES

All five El Lift agents serve as call-takers and dispatchers and have some role in trip scheduling. As shown in Figure 5.1, there are multiple agents working on weekdays between 8 a.m. and 5 p.m., when El Lift is accepting trip requests. On weekdays from 6 to 8 a.m. and from 5 to 8 p.m., one agent is working. Before 6 a.m. and after 8 p.m., telephone calls roll over to the El Metro fixed route dispatchers. El Metro fixed route dispatchers also handle calls from the El Lift drivers before 6 a.m. and after 8 p.m. on weekdays. This appears to be sufficient coverage during weekdays.

On Saturday and Sunday, there are two agents each day, with coverage from 6 a.m. to 8 p.m. From the start of El Lift service until 8 a.m. and after 8 p.m. until the end of El Lift service, the fixed route dispatchers handle any calls from the El Lift drivers. However, as noted in Section 5, El Lift agents said that they do not accept trip requests on Saturday and Sunday.

El Metro should investigate the cost to upgrade the telephone system for El Lift so that managers have the capability to track and report hold times. Currently, telephone capacity does not appear to be a constraint on requesting El Lift service. However, as demand increases, managers should be able to determine if there are certain periods during the week when calls are on hold—so that they can match staffing of agents to meet the call volumes.

There is no dedicated road supervisor for El Lift service. The El Lift supervisor, as time permits, acts as the El Lift road supervisor. There are five road supervisors for El Metro fixed route service. These fixed route road supervisors can help respond to El Lift incidents and accidents, but are not allowed to make monitoring observations of El Lift service.

Recommendation: El Metro managers should give the fixed route road supervisors the authority to monitor both fixed route and El Lift services.

8.6 OPERATING BUDGET

As an agency of the City of Laredo, El Metro’s board of directors consists of nine members, who are also the eight members of the City Council plus the mayor. The El Metro board has ultimate responsibility for El Metro service, including its obligations to provide ADA complementary paratransit service. According to the Assistant General Manager of Administration and Finance, El Metro has needed to keep the El Lift budget stable even as the ridership has grown. El Metro does not base the El Lift budget on any forecast of actual demand for service and the required resources to meet that demand. This is discussed in more detail in Section 8.7.

OPERATING BUDGET

Table 8.1 presents El Lift ridership and operating costs for FY 2008–2012. The El Lift operating costs are computed based on actual operating and vehicle maintenance costs, plus an allocation (20 percent) of other El Metro expenses: training and safety; building and grounds maintenance; bus stop and shelters maintenance; operating costs of the downtown transit center and Scott Street transit facility; customer service; planning; marketing; and other general administration.

Table 8.1 – Ridership and Budget for El Lift

FY	Ridership	% Change	Vehicle Hours	Operating Costs	Cost Per Trip
2008	50,359	—	36,347	\$2,117,233	\$42.04
2009	48,394	-3.90	27,953	\$2,052,447	\$42.41
2010	52,265	8.00	28,576	\$1,921,926	\$36.77
2011	55,154	5.53	29,357	\$1,922,562	\$34.86
2012	57,488	4.23	28,775	\$2,147,163	\$37.35

Source: El Metro

El Lift’s cost per trip has decreased as ridership has grown while the operating costs have been fairly stable. From FY 2008 to FY 2009, the number of vehicle hours provided by El Lift was reduced from 36,347 to 27,953, a decrease of 23 percent. The vehicle hours have increased since FY 2009, but in FY 2011, El Lift had 21 percent fewer vehicle hours compared with FY 2008. In FY 2012 and FY 2013, El Lift scheduled 13-14 vehicle runs on weekdays, 4 runs on Saturday, and 3 runs on Sunday. Before the reduction in vehicle hours, El Lift scheduled 16-17 weekday runs, 5 Saturday runs, and 3 Sunday runs. Even with improvements in vehicle productivity, this reduction in service leads to lower overall capacity—and no capacity for unmet demand.

8.7 ADDRESSING UNMET DEMAND

EXISTING UNMET DEMAND

As discussed in the ADA Plan Update, El Metro will need to commit additional resources to eliminate existing denials, estimated at 7 percent of current ridership. This is projected to cost approximately \$150,000 per year, as shown in Table 8.2. Some of this cost increase could be mitigated by policy changes, as discussed below.

**Table 8.2 – Estimate of Vehicle Hours and Operating Cost
To Serve Extra 7% El Lift Demand**

FY 2012 Ridership	7% Additional Trips	Operating Cost/Trip	Additional Cost
57,488	4,014	\$37.35	\$149,923

ADDITIONAL UNMET DEMAND

Looking forward, the team recommends that El Metro consider a range of measures to address unmet demand. Absent any policy changes, the unmet demand for service is potentially double existing levels. This clearly would have significant budget implications for El Metro and the City of Laredo. The following discussion explains how the team arrived at this estimate and presents potential steps that El Metro can take in the future.

El Lift ridership for FY 2012 was 57,488 one-way passenger trips. To determine how this level of ridership compared with other transit systems, the team used a national ADA paratransit ridership model to estimate the predicted ADA paratransit ridership in the El Metro service area. The national model, developed by the Transportation Cooperative Research Program (TCRP) and detailed in *TCRP Report 119, Improving ADA Complementary Paratransit Demand Estimation*, used data from 28 transit systems across the country to model ADA paratransit demand. The model estimates ADA paratransit demand based on the population of the service area, the base fare charged, the percentage of the population with household incomes below the poverty level, the effective window used to determine on-time performance, the percentage of applicants found conditionally eligible, and whether conditional eligibility is used to do trip-by-trip eligibility in operations. The model inputs are shown in Table 8.3.

Table 8.3 – Input Values for Laredo, TX to the TCRP Model for ADA Paratransit Demand

Factor	Value for El Metro
ADA service area population (2010 census)	241,350
Base fare for ADA paratransit (\$)	\$1.00
Percent of applicants for ADA paratransit found conditionally eligible (0 to 100)	0.0
Conditional trip determination used (0=No, 1=Yes)	0
Percent of ADA service area population in households with 2010 income below poverty line	27.3
Effective on-time window for ADA paratransit (minutes)	30

Using these factors, the TCRP model estimates an annual demand of 108,070 one-way trips for Laredo (0.45 annual trips per capita). This is nearly double the actual ridership for FY 2012. This large difference between the actual ridership and the model’s projected demand for service likely indicates a considerable latent demand for ADA paratransit service.

EL METRO POLICY OPTIONS

Recommendations: The TCRP paratransit demand model is sensitive to fares and to the use of conditional eligibility. Regarding conditional eligibility, the team has recommended that El Lift modify its policies to introduce conditional eligibility, which would result in some riders using El Metro for certain trips and El Lift for other trips (see Section 4.2).

At present, the El Lift fare is \$1, which is lower than the El Metro base fare of \$1.50. The DOT ADA Regulations allow transit systems to charge twice the fixed route fare. Were El Metro to raise the El Lift fare to \$3, this would be a dramatic (and perhaps unreasonable) fare increase. Nevertheless, the team recommends increasing the El Lift fare to \$1.50 to at least be equal to the fixed route fare.

Assuming a higher base fare of \$1.50 and that 20 percent of the El Lift applicants received conditional eligibility, the model estimates a demand of 59,905 riders per year, which is higher than current ridership (57,488) but lower than the current demand of 61,502 (57,488 riders plus 4,014 denied riders – see Table 8.2). To meet this level of demand, El Metro would need to spend an additional \$90,000 per year over current levels.

The projected increases in operating expenses do not account for the potential need to increase the size of the El Lift fleet. Because the current fleet size exceeds the number of vehicles needed (including spares), the additional vehicles needed would not be proportional to the corresponding increases in operating expenses. Furthermore, if El Metro were to contract with private carriers to meet some of the additional demand, this would also lessen the need to increase El Lift's fleet size.

9 ADDITIONAL RECOMMENDATIONS

The public transportation system is a vital resource in Laredo and the City is committed to providing this resource. The El Metro bus routes cover a large geographic area with extensive service hours. Despite a more than 25 percent drop in bus ridership by FY 2011 resulting from the economic downturn, El Metro reduced its operating budget by only 5 percent and actually increased the number of vehicle revenue hours.

As evidenced by its preparation of the ADA Paratransit Plan Update (Plan Update), El Metro is also committed to providing complementary paratransit that complies with the US DOT ADA regulations. To achieve compliant service, El Metro will need to implement a number of changes to its El Lift service in the areas of management and oversight, ongoing training for staff (to match the software and equipment), and updated policies and procedures. The El Lift service will also need more resources, including additional hours of service, particularly on weekday mornings and weekend afternoons. This section covers other means by which El Metro can serve more riders—or more broadly, better serve the transportation needs of persons with disabilities in Laredo, including:

- Greater fixed route accessibility
- Improved use of paratransit software
- Working with other transportation providers

9.1 GREATER FIXED ROUTE ACCESSIBILITY

El Metro's entire fixed route fleet is accessible. The larger challenge is to make the bus stops and routes to the stops accessible. In order to implement conditional eligibility on a wider basis for more trips, it is crucial that potential fixed route riders have access to the bus stops.

Since FY 2009, the City of Laredo has been using Community Development Block Grants to renovate sidewalks with the intent of making them compliant with the ADA Accessibility Guidelines (ADAAG). Working with the El Metro planner, the Community Development Department has targeted particular blocks that have bus stops in order to create accessible routes to these bus stops. According to a compliance officer for the Community Development Department, the City will use \$647,000 to improve downtown sidewalks. In District VII (north of downtown, roughly bounded by Chicago Street, I-35, and the Rio Grande), the City has allocated another

\$368,000 for sidewalk improvements in FY 2014. These projects are examples of how make sure that more riders have the opportunity to use the accessible buses.

In addition, the City of Laredo has used FTA New Freedom funds to construct approximately \$300,000 of sidewalk and accessibility improvements throughout the City on streets along El Metro fixed routes.

As is done at other transit systems, El Metro can work closely with planners and engineers to prioritize sidewalk improvements.

Recommendation: El Metro staff should analyze the current trip patterns of El Lift riders to identify and share with planners and engineers the sidewalk and bus stop improvements that would permit El Lift riders (with mobility disabilities) to access El Metro for some trips. Such targeted investments, in conjunction with implementation of conditional eligibility, can yield operating cost savings over time.

9.2 IMPROVED USE OF PARATRANSIT SOFTWARE

The El Lift agents use Trapeze PASS (version 10), a powerful software tool for paratransit operations, which enables them to take trip requests, assign trips to vehicle runs, dispatch on the day of service, and analyze performance. While the agents know how to use Trapeze, they are not making use of features that would enable to work more efficiently. Better use of the software could also improve the productivity of vehicle operations. In addition, there are refinements to certain parameters in the system that should be adjusted to further improve performance.

For example, when agents are taking trip requests and searching for possible assignments to a vehicle run, they do not appear to be using the precise time suggested by Trapeze; instead, they round the time to the nearest 15 minutes. This makes the resulting schedules less efficient. Later in the scheduling process, the lead scheduler rearranges trip assignments made by Trapeze—in effect, manually scheduling all the trips. Given the current trip volume (roughly 200 per weekday), the lost productivity is not great, but as the number of trips increase, these practices will lead to higher than necessary costs.

The team’s recommended changes to the Trapeze parameters are discussed in Section 6.2. Implementing the team’s recommendations would lead to an estimated 10 percent increase in vehicle productivity. While the team recommends that all El Lift agents receive further training in the use of Trapeze, El Metro should also designate an individual to be the Trapeze “expert.” This individual would know how to make future adjustments to the parameters and act as the contact person when getting technical assistance from the software vendor. Depending on their current skills and aptitudes, this could be the El Lift supervisor or one of the agents.

9.3 WORKING WITH OTHER TRANSPORTATION PROVIDERS

There are private companies in Laredo that El Metro could work with if it chooses not to operate all El Lift service directly. Using these private companies could provide El Metro with additional capacity in terms of vehicles, drivers, and dispatch. It would not remove El Metro’s responsibility for monitoring service or for making eligibility determinations. The actual extent of tasks handled by a contractor versus by El Lift staff would depend on the agreement between El Metro and the contractor.

El Metro would also be aware of any labor agreements with current staff, as well as applicable US Department of Labor requirements for FTA grantees.

PRIVATE TAXI COMPANIES

In other cities, transit systems contract with private taxi companies to operate a portion of the ADA paratransit service. For example, MTA of Harris County (Houston) makes extensive use of taxis for its ADA paratransit service for those trips that do not require an accessible vehicle so that sedans can be used. Some systems contract with taxi companies that have accessible vehicles available.

There are many ways that El Metro could choose to make use of a contractor, including:

- On-call, as needed, during peak periods and other times when demand exceeds El Lift capacity

- During evenings and weekends, when demand is lower, yielding lower productivity
- For a specific geographic region
- For particular types of trips, e.g., long trips that are not easy to group

Currently there are eight taxi companies in Laredo. There are also parallel sets of private companies that provide Medicaid transportation in Webb County. These companies could be candidates for providing a portion of the El Lift trips.

Recommendation: El Metro should investigate contracting with private taxi companies to provide a portion of El Lift service.

OTHER TRANSPORTATION PROVIDERS

Webb County's Community Action Agency operates the El Aguila rural transit system. El Aguila primarily serves residents in rural Webb County, operating both fixed routes and demand responsive service with six fixed routes that run daily. Demand responsive service runs on weekdays.

The cost per trip that other transportation providers may offer can be lower than the cost per trip of El Lift service. This is may be due to several factors, such as:

- Shared overhead among several transportation programs
- Shared operations, even vehicles carrying riders from multiple programs
- Lower capital costs (smaller vehicles)

Lower costs may also result from factors such as lower driver wages, less vehicle maintenance, and/or less oversight. In any agreement with a private contractor, El Metro must ensure that the performance and quality of service that it receives is equivalent to the service that it provides directly. The service quality that El Metro expects from a contractor may be higher than the quality the contractor provides to other clients. Any contractor would also be subject to the same FTA requirements as is El Metro—for example, drug and alcohol testing for drivers and other safety-sensitive employees. As a result, the costs savings may not be as great as anticipated. And to ensure the proper performance and service quality, El Metro would have to closely monitor the contractor's service

In summary, there is potential increased capacity for El Lift service using contractors, along with potential savings versus the cost of increasing in-house capacity. However, El Metro managers must clearly define the service that they are seeking from a contractor, along with a monitoring plan to ensure that they and their riders receive the proper service.

Recommendation: El Metro should investigate the potential benefits of coordinating El Lift service with the County's El Aguila paratransit service.

Appendix A

Laredo Urban Transportation Study ADA Paratransit Plan Update Kickoff Visit Schedule

Laredo Urban Transportation Study: ADA Paratransit Plan Update Kickoff Visit Schedule

Monday, September 10, 2012

10 a.m.	Opening meeting with LUTS and Metro managers <ul style="list-style-type: none">• project goals• areas of focus• other areas for technical assistance• public participation and input• project schedule	1301 Farragut Street, Laredo
11:15	Overview of Lift service <ul style="list-style-type: none">• standards• policies• oversight• rider comments and complaints• statistics• finances	1301 Farragut Street
1 p.m.	Overview of Lift eligibility determination process	1301 Farragut Street
2	Tour of Lift operations facility	401 Scott Street
2:15	Observations of Lift operations <ul style="list-style-type: none">• reservations call-taking• trip scheduling• vehicle dispatching	401 Scott Street

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Appendix B

Technical Areas and Activities Covered During Site Visit

Team Activities During Site Visit

Activity/ Topic	Mon Oct 22	Tue Oct 23	Wed Oct 24	What/ Who We Need
Opening Meeting	9 a.m.			Introduce review team. Discuss goals for site visit. Key Metro and Lift managers, LUTS manager.
Debrief Meeting			<i>Friday, 10/25 11 a.m.</i>	Present preliminary findings from week's data collection and analysis. Discuss future activities Key Metro and Lift managers, LUTS manager.
Eligibility	a.m.	a.m., p.m.	a.m.	Eligibility policies, sample client files. Meet with eligibility coordinator.
Complaints	a.m.	a.m.		Complaint files (2012). Meet with customer service staff.
Telephone system			a.m.	Information on Lift telephone system. Phone hold time reports. Meet with staff knowledgeable with phone system.
Budget/ Resources/ paratransit demand	a.m.			Lift budgets and actual expenditures, 2007-2012, projected Lift budgets. Meet with finance manager.
Reservations/ call-taker observations	p.m.	a.m.	a.m.	We will observe reservations for Lift. We will also listen to recordings of Lift reservations.
Scheduling	p.m.	p.m.	p.m.	Interview lead scheduler for Lift.
Dispatching	p.m.	p.m.	p.m.	We will observe dispatching of Lift service.
Driver interviews		p.m.	p.m.	We will interview Lift drivers (up to 10), 15 minutes per interview.
Service area/ Days & hours/ Fares/ Coordination		p.m.	p.m.	Policy information about Metro and Lift fares, service days and hours, service area. Also, how does Lift carry out days/hours, service area? Meet with Lift supervisor and other staff.
Trip Denials			a.m.	Lift policy on trip denials. Completed driver manifests and reconciled data. We will also listen to recordings of Lift reservations.

Activity/ Topic	Mon Oct 22	Tue Oct 23	Wed Oct 24	What/ Who We Need
On-time performance	a.m.	a.m.		Sample completed manifests and electronic data. We will work with staff knowledgeable in Trapeze software.
Trip length	a.m.	a.m.		Sample completed manifests and electronic data. We will work with staff knowledgeable in Trapeze software. Also work with fixed route planner/ customer service agent to get travel times for comparable fixed route trips.
PAC Meeting, Public Meeting		6 p.m.		Present overview and goals of project. We will have presentation. We have hired interpreter. We will bring refreshments.
Other paratransit services			a.m.	Information on other paratransit services in Metro service area. Meet with Metro (or LUTS?) planner.
Fixed route information	a.m.	a.m.		Full information on Metro bus service and other fixed route service in or adjoining Metro service area. Meet with Metro (or LUTS?) planner.
Consumer interviews				Names and contact information for Lift riders.

On Thursday, October 25, please note that the team members will be conducting additional observations and analysis as needed.

Appendix C

Public Meeting Presentation

City of Laredo/ LUTS
23 October 2012

El Lift ADA Paratransit Plan Update



the COLLABORATIVE

Change for Good

City of Laredo/ LUTS
23 October 2012

Public Meeting
El Metro/
Laredo Urban Transportation Study (LUTS)
El Lift ADA Paratransit Plan Update

City of Laredo/ LUTS
23 October 2012

Thank you for participating this evening

the COLLABORATIVE

Change for Good

City of Laredo/ LUTS

23 October 2012

Schedule for this Evening

- Introductions
- Requirements for “ADA Complementary Paratransit”
- ADA Plan Update
- Project Tasks
- Project Schedule
- Your Comments, Questions

City of Laredo/ LUTS

23 October 2012

Participants

- Residents of Laredo
- Laredo Urban Transportation Study (LUTS)
- City of Laredo/ El Metro and El Lift
- Contractor Team:
 - The Collaborative
 - TranSystems Corp
 - Cambridge Systematics

City of Laredo/ LUTS
23 October 2012

What is ADA Complementary Paratransit?

- Required by Americans with Disabilities Act (ADA) and US DOT regulations
- Must “complement” fixed route public transit (in Laredo, this is El Metro bus service)
- Must be available to individuals who are not able to use El Metro

City of Laredo/ LUTS

23 October 2012

Requirements for ADA Paratransit

- Service area
- Days and hours
- Fare
- Reservation up to day before trip
- Trip for any purpose
- No “capacity constraints”

Requirements for ADA Paratransit (cont.)

- **Examples of capacity constraints**
 - Trip denials or waiting lists
 - Trip caps
 - Substantial number of late pickups or drop-offs
 - Substantial number of long trips
 - Long telephone hold times
 - Any other operational pattern or practice that substantially limits availability of service

ADA Plan Update

- **Contents**
 1. Name of entity
 2. Description of El Metro bus service
 3. Description of El Lift paratransit service
 4. Plan to meet ADA requirements, including
 - Estimated demand for paratransit
 - Planned changes to current service
 - Timetable and budget

ADA Plan Update

- Contents (cont.)
- 5. Eligibility process, including:
 - Application and certification
 - Appeals process
 - Visitor policy
- 6. Public participation process
- 7. Coordination with other transit systems
- 8. Endorsements and certifications

Project Tasks

- Task 1 – Kickoff Meeting
 - COMPLETED on Sept 10
- Task 2 – Prepare for Evaluation
 - Review Metro and Lift information
 - Prepare analysis and make Team assignments
 - COMPLETED

Project Tasks (cont.)

- **Task 3 – Conduct Evaluation**
 - Full week in Laredo for Team
 - Key Task in preparing Plan Update
 - Observations of Lift operations
 - Interviews with managers, drivers, other staff
 - Evaluate eligibility process
 - Data analysis
 - Review Lift policies and resources
 - Review Lift resources

Project Tasks (cont.)

- Task 4 – Conduct Meetings
 - Required and important to get public input
 - This evening’s meeting
 - Metro board meeting
 - Also: interviews with Lift riders, key Lift service centers (e.g., dialysis)
 - Your suggestions welcome

Project Tasks (cont.)

- Task 5 – Prepare Draft Final Report
 - Will include all components of ADA Plan Update
 - Will submit to LUTS
 - Will present to Metro Board
- Task 6 – Prepare Final Report and Present to LUTS
 - Will include comments from LUTS and Metro Board meeting
 - Deliver to LUTS and present at LUTS meeting

Project Tasks (cont.)

- Task 7 – Prepare and Submit ADA Paratransit Plan Update
 - Will submit after approval by LUTS
 - Printed copies and electronic files

City of Laredo/ LUTS
23 October 2012

Project Schedule

- Initial visit: September 10
- Site visit: October 22-26
- Public Meeting: October 23
- Draft Report: early December
- Present Draft Report to Metro Board:
mid-December

City of Laredo/ LUTS

23 October 2012

Project Schedule (cont.)

- Submit Final Report to LUTS: January 2013
- Present Final Report to LUTS: January 2013
- Submit ADA Plan Update to LUTS:
late January 2013

City of Laredo/ LUTS

23 October 2012

For more Information

- Eddie Bernal, Metro
956-795-2288 x233
ebernal@ci.laredo.tx.us
- Vanessa Guerra, LUTS
956-794-1604
vguerra@ci.laredo.tx.us
- David Chia, The Collaborative
617-338-0018 x17
dc@thecollaborative.com

City of Laredo/ LUTS

23 October 2012

Your Questions, Comments

the COLLABORATIVE

Change for Good

Appendix D

El Metro Fixed Route Fleet

EL METRO VEHICLE LISTING

Veh		No	Type	Make	Ft.	Model	Year	Fuel	VIN	Plate No	Warranty
1		0024	BUS	RTS NovaBUS	40	T8020VN	2000	CNG	4RKMNTJA8YR835193	816-005	no
2		0025	BUS	RTS NovaBUS	40	T8020VN	2000	CNG	4RKMNTJA8YR835194	816-003	no
3		0026	BUS	RTS NovaBUS	40	T8020VN	2000	CNG	4RKMNTJAIYR835195	816-004	no
4		0327	BUS	Blue Bird	35	102 Xcel	2003	CNG	1BAGJBMA93F215303	858-672	no
5		0328	BUS	Blue Bird	35	102 Xcel	2003	CNG	1BAGJBMA23F218305	858-674	no
6		0329	BUS	Blue Bird	35	102 Xcel	2003	CNG	1BAGJBMA43F215306	858-675	no
7		0330	BUS	Blue Bird	35	102 Xcel	2003	CNG	1BAGJBMA03F215304	858-673	no
8		0331	BUS	Blue Bird	35	102 Xcel	2003	CNG	1BAGJBMAX3F217254	868-931	no
9		0633	BUS	Blue Bird	35	102 Xcel	2006	CNG	1BAGJBMA07F236711	231-458	no
10		0634	BUS	Blue Bird	35	102 Xcel	2006	CNG	1BAGJBMA27F236712	231-457	no
11		0635	BUS	Blue Bird	35	102 Xcel	2006	CNG	1BAGJBMA47F236713	231-451	no
12		0636	BUS	Blue Bird	35	102 Xcel	2006	CNG	1BAGJBMA67F236714	231-456	no
13		0637	BUS	Blue Bird	35	102 Xcel	2006	CNG	1BAGJBMA87F236715	231-453	no
14		0638	BUS	Blue Bird	35	102 Xcel	2006	CNG	1BAGJBMAX7F236716	231-455	no
15		0639	BUS	Blue Bird	35	102 Xcel	2006	CNG	1BAGJBMA36F236717	231-454	no
16		0901	BUS	Gillig	35	G27D102N4	2009	Diesel	15GGB271781176089	106-4678	no
17		0902	BUS	Gillig	35	G27D102N4	2009	Diesel	15GGB271191176090	106-2934	no
18		0903	BUS	Gillig	35	G27D102N4	2009	Diesel	15GGB271391176091	106-2935	no
19		0904	BUS	Gillig	35	G27D102N4	2009	Diesel	15GGB271591176092	106-2940	no
20		0905	BUS	Gillig	35	G27D102N4	2009	Diesel	15GGB271791176093	106-2939	no
21		0906	BUS	Gillig	35	G27D102N4	2009	Diesel	15GGB271991176094	106-2938	no
22		0907	BUS	Gillig	35	G27D102N4	2009	Diesel	15GGB271091176095	106-2937	no
23		0908	BUS	Gillig	35	G27D102N4	2009	Diesel	15GGB271291176096	106-2936	no
24		0909	BUS	Gillig	35	G27D102N4	2009	Diesel	15GGB271491176097	1064656	no
25		0910	BUS	Gillig	35	G27D102N4	2009	Diesel	15GGB271291176098	1064657	no
26		0929	BUS	Gillig	30	627E102N2	2009	Diesel	15GGE271091091879	108-2588	no
27		1130	BUS	Gillig	40	G27D102N4	2011	Diesel	15GGD2714B1178156	1116722	YES
28		1131	BUS	Gillig	40	G27D102N4	2011	Diesel	15GGD2716B1178157	1118575	YES
29		1132	BUS	Gillig	40	G27D102N4	2011	Diesel	15GGD2718B1178158	1116724	YES
30		1133	BUS	Gillig	40	G27D102N4	2011	Diesel	15GGD271XB1178159	118576	YES
31		1134	BUS	Gillig	40	G27D102N4	2011	Diesel	15GGD2716B1178160	1116723	YES
32		1135	BUS	Gillig	40	G27D102N4	2011	Diesel	15GGD2718B1178161	1118577	YES
33		1136	BUS	Gillig	35	G27B102N4	2011	Diesel	15GGB2712B1178162	1116711	YES
34		1137	BUS	Gillig	35	G27B102N4	2011	Diesel	15GGB2714B1178163	1116712	YES
35		1138	BUS	Gillig	35	G27B102N4	2011	Diesel	15GGB2716B1178164	1116713	YES
36		1139	BUS	Gillig	35	G27B102N4	2011	Diesel	15GGB2718B1178165	1116714	YES
37		1140	BUS	Gillig	35	G27B102N4	2011	Diesel	15GGB271XB1178166	1116716	YES
38		1141	BUS	Gillig	35	G27B102N4	2011	Diesel	15GGB2711B1178167	1116717	YES
39		1142	BUS	Champion	30	CHP20679	2011	Diesel	4UZADEDU3BCBF5057	1125106	YES
40		1143	BUS	Champion	30	CHP20679	2011	Diesel	4UZADEDU5BCBF5058	1125105	YES
41		9801	BUS	RTS NovaBUS	35	T70606	1998	CNG	4RKNNTJA4WR833376	752-839	no
42		9802	BUS	RTS NovaBUS	35	T70606	1998	CNG	4RKNNTJA2WR833506	752-838	no
43		9804	BUS	RTS NovaBUS	35	T70606	1998	CNG	4RKNNTJA6WR833508	752-837	no
44		9805	BUS	RTS NovaBUS	35	T70606	1998	CNG	4RKNNTJA8WR833509	751-300	no
45		9806	BUS	RTS NovaBUS	35	T70606	1998	CNG	4RKNNTJA4WR833510	752-835	no

EL METRO VEHICLE LISTING

Veh										
No	Type	Make	Ft.	Model	Year	Fuel	VIN	Plate No	Warranty	
46	9807	BUS	RTS NovaBUS	35	T70606	1998	CNG	4RKNNTJA6WR833511	752-841	no
47	9808	BUS	RTS NovaBUS	35	T70606	1998	CNG	4RKNNTJA8WR833512	752-840	no
48	9708	BUS	RTS NovaBUS	35	T70606	1997	CNG	4RKNDTJAXVR832279	721-153	no
49	9714	BUS	RTS NovaBUS	35	T70606	1997	CNG	4RKNDTJA5VR832285	721-149	no

Appendix E

Customer Service Form

Appendix F

Application for Certification of ADA Paratransit Eligibility

Disability Verification for Demand Responsive Transportation



LAREDO TRANSIT MANAGEMENT INC.

Application for Certification of ADA Paratransit Eligibility

The Americans With Disabilities Act of 1990 (ADA) is federal legislation prohibiting discrimination against people with disabilities. One of the overriding principles of the ADA is to ensure that all people have equal access to public transportation. In order to ensure this access, public transit vehicles and facilities are required to be fully accessible and usable by persons with disabilities. For people who are unable, due to a physical or mental disability (including mobility or cognitive impairments) to independently use the public fixed-route transportation regular bus, paratransit services must be made available.

If you believe that you have a disability (including mobility or cognitive impairments), which prevents you from independently using public fixed-route transportation facilities and/or vehicles, please complete this application form and return it to the LAREDO TRANSIT MANAGEMENT INC. office located at the Transit Center downtown office. The questions on this application are designed to provide assistance in determining your functional abilities.

Your completed application will be reviewed and a decision regarding your eligibility for paratransit services made within 21 days. You may be found eligible for paratransit services for all of your travel needs, eligible (based on your abilities) for some requests but not for others, or you may be found capable of using the fixed-route facilities and vehicles. If you disagree with the decision made regarding your eligibility status, you may appeal the decision. It is possible that upon review of your application, you may be asked to provide additional information. This may include contacting a licensed professional familiar with your functional abilities, a phone or personal interview, or a physical or cognitive functional evaluation.

All information regarding the certification process and paratransit services will be made available in accessible formats (i.e. Large Print, Audio Tape, CD, other) upon request.

All information requested throughout the certification process will be kept confidential.

It is important to complete all parts of this form -- type or print, please. Applications that are not complete or clearly written will be returned, which will delay the eligibility determination process.

Application
Effective on September 2012

This page is blank.

PART 1. General Information

First Name _____ Middle Initial _____

Last Name _____ Sex: M _____ F _____

Street Home Address: _____ Apt.#: _____

City: _____ State: _____ ZIP: _____

Mailing Address (if different from Home): _____ Apt.#: _____

Daytime Phone: (____) _____ TDD/TTY: (____) _____

Evening Phone: (____) _____ Birth Date: ____/____/____

Do you need this application and future written information provided to you in an accessible format? ____ Yes ____ No (If yes, what format do you prefer):

____ CD ____ Audio Tape ____ Large Print _____ Other

If assistance was provided in filling out this form, please indicate by whom:

Name: _____ Phone: (____) _____

Relationship: _____

Please indicate if this person should be contacted directly if additional information is requested.

Yes No

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

Name: _____ Relationship: _____

Daytime Phone: (____) _____ Evening Phone: (____) _____

PART 2. Please answer the following questions in detail -- your specific answers to the questions will help us in determining your eligibility.

1.

a. What is your disability or health related condition that prevents you from using public transit?

b. Explain HOW your disability or health related condition prevents you from independently using the public transit services (EL METRO buses).

c. Are the conditions you described permanent _____ or temporary _____? (Please check one.) If temporary, how long do you expect this to continue? _____

2. How do you currently travel to your most frequent destinations? Check all that apply:

- _____ Public Buses
- _____ Someone drives me
- _____ Drive myself
- _____ Paratransit
- _____ Taxi
- _____ Other: _____

3. Does your health condition or transportation disability change from day to day in a way that affects your ability to use public buses?

Yes, good on some days, bad on others. No, doesn't change. Don't know. If yes or don't know is selected, explain why:

For questions 4 through 12, please indicate whether you are independently able to perform the following functions. ALL no or sometimes answers must be accompanied by an explanation or the application will be considered incomplete.

4. Are you able to understand directions needed to complete a trip? (This doesn't refer to being unaccustomed to the English language.) Yes No Sometimes

If no or sometimes is selected, explain why:

5. Are you able to identify the correct public transit stop? Yes No Sometimes
If no or sometimes is selected, explain why:

6. Are you able to identify the correct public transit vehicle? Yes No Sometimes
If no or sometimes is selected, explain why:

7. Are you able to get to and from the nearest public transit stop? Yes No Sometimes
If no or sometimes is selected, explain why:

Note how many city blocks you can independently travel: _____

8. Are you able to wait at least 15 minutes at a public transit stop? Yes No Sometimes
If no or sometimes is selected, explain why:

Could you wait longer than 15 minutes?

Yes No Sometimes

If so, how long? _____(Minutes)

Could you wait if there were a seat or bus shelter? Yes No Sometimes

9. Are you able to get on and off the public transit vehicle without assistance?

If no or sometimes is selected, explain why:

10. Are you able to get on or off a public transit bus if it has a lift or if the front of the bus is lowered?

- Yes
- No
- Sometimes
- Don't know, never tried it.

If no or sometimes is selected, explain why:

11. Are you able to grasp handles or railings, coins or tickets while boarding or exiting the transit vehicle?

- Yes
- No
- Sometimes

If no or sometimes is selected, explain why:

12. Are you able to maintain balance and tolerate public transit vehicle movement when seated?

- Yes
- No
- Sometimes

If no or sometimes is selected, explain why:

13. Have you ever had any training or instruction to learn how to use the public transit bus?

- Yes
- No

If yes is selected, where and when did you receive this training.

14. Is the public transit you need accessible?

- Yes
- No
- Sometimes
- Don't know, never tried it. If no or sometimes is selected, explain in what way is it not accessible?

15. Do you use any of the following mobility aids or specialized equipment? Check all that apply.

- | | |
|---|--------------------------------------|
| <input type="checkbox"/> Manual Wheelchair* | <input type="checkbox"/> Cane |
| <input type="checkbox"/> Electric Chair* | <input type="checkbox"/> White Cane |
| <input type="checkbox"/> Powered Scooter* | <input type="checkbox"/> Prosthesis |
| <input type="checkbox"/> Communication Board | <input type="checkbox"/> Leg Braces |
| <input type="checkbox"/> Breathing Apparatus (Portable O ₂) | <input type="checkbox"/> Crutches |
| <input type="checkbox"/> Guide Dog / Service Animal | <input type="checkbox"/> Personal ID |
| <input type="checkbox"/> Walker | |
| <input type="checkbox"/> Cue Cards | |
| <input type="checkbox"/> Other _____ | |

16. Does a Personal Care Attendant (PCA) and or service animal accompany you when you travel outside your home? Note: A PCA is someone who is designated or employed by a person with a disability to assist that person in meeting his or her personal needs and/or to facilitate travel for a specific trip. A service animal is trained to provide assistance and is not a pet.

- Yes
- No
- Sometimes

If Yes or Sometimes, please provide the name of the PCA and/or the type of service animal:

17. Do you currently use paratransit service? (Please check one):

- Yes
- No
- Sometimes

If yes or sometimes is selected, when do you use paratransit service? _____

Please give paratransit provider's name: _____

PART 3. Signature: Please Complete Box A Unless you are a Minor or Have a Legal Guardian, in Which Case Your Parent or Legal Guardian Should Complete Box B.

A. I certify that the information in this application is true and correct. I understand that falsification of the information may result in denial of service. I understand all information will be kept confidential, and only the information required to provide the services I request will be disclosed to those who perform the services. I understand that it may be necessary to contact a professional familiar with my functional abilities to use public transit in order to assist in the determination of eligibility.

Applicant's signature _____ Date _____

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

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

(Check one of the following)

_____ I will be present.

_____ I designate _____ to be present on my behalf, or

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

_____ Date _____

(Signature of Parent or Legal Guardian)

AUTHORIZATION FOR RELEASE OF MEDICAL RECORDS

(Must be completed by Applicant)

Disability verification by a qualified license physician does not guarantee eligibility for paratransit services transportation, but it can play a major role in the eligibility determination process. It is important that any professional that verifies an individual's disability be familiar not only with that person's particular disability, but also his/her ability or inability to travel on EL METRO's regular bus system.

Statement of Release

I, the undersigned, understand that the medical information requested is confidential and will not be shared with any other person or agency. I hereby authorize the release of any and all medical records and/or information by the professionals listed below to the LAREDO TRANSIT MANAGEMENT INC. for the express purpose of determining my eligibility for paratransit services.

Qualified Professionals

Note: Only a Licensed Physician is authorized to verify your disability.:

Name of License Physician _____

Address _____

City _____ State _____ Zip Code _____

Office Telephone Number _____

Applicant Name (please print) _____

Applicant Signature (required) _____ Date _____



Applicant  here. A Qualified Professional must fill out pages!

PART 4: DISABILITY VERIFICATION FOR DEMAND RESPONSE TRANSPORTATION

This Section to be Filled out by a LICENSE PHYSICIAN. Please Print.

Dear Physician:

The person submitting this booklet to you has indicated that you can provide information regarding his/her disability and its impact upon his/her ability to utilize public transit services. The Americans With Disabilities Act of 1990 requires the LAREDO TRANSIT MANAGEMENT INC. DBA El Metro to provide demand response transportation to persons who, due to their disability, cannot utilize the regular bus system. Three categories established by the Disability Act are as follows:

1. Persons who, because of their disability, cannot independently board, ride, and/or disembark from an accessible vehicle.
2. Persons who, because of their disability, cannot use vehicles without lifts or other accommodations.
3. Persons who, because of their disability, cannot get to or from a boarding or disembarking location.

The information you provide, as authorized on page 8 of this booklet, will allow us to make an appropriate evaluation of this request and its application to specific trip requests.

Disability verification is mandatory for all applicants for demand response transportation service. While verification by a physician is not required, any professional that verifies an individual's disability must have a detailed, first-hand knowledge of that person's disability, as well as the training and credentials necessary for such an evaluation.

Thank you for your assistance.

Please describe your professional status (Licensed Physician) and your methods of evaluating the applicant's disability.

Please describe the applicant's current disabling condition.

Is the condition or disability temporary?

___ Yes ___ No

If Yes, expected recovery ___/___/___ (___ months)

Physical Disabilities

Using a mobility aid, or on his /her own, how far is the applicant able to travel without the assistance of another person?

- Less than 200 ft. Less than 200 ft. Two Blocks
- ¼ Mile (3 blocks) ½ Mile (6 blocks) ¾ Mile (9 blocks)
- More than ¾ Mile Other

Can the applicant climb three 12-inch steps using handrails without the assistance of another person?

- Yes No Sometimes

Can the applicant wait outside without support or supervision for ten (10) minutes?

- Yes No Sometimes

Does the applicant require special assistance and/or the use of any mobility aids? Please describe.

Does the applicant with his/her mobility unit weigh more than 600 lbs.?

- Yes No Weight _____

Can the applicant ride a regular EL METRO bus, or if needed, a wheelchair accessible EL METRO bus? Please describe.

If the applicant falls, can he/she get up independently?

- ___ Yes ___ No ___ Sometimes

Can the applicant negotiate traffic safely and independently?

- Yes No Sometimes

Visual Disabilities

If the applicant has a visual impairment, please provide his/her acuity with best correction:

Right Eye _____ Left Eye _____ Both Eyes _____

Visual Fields:

Right Eye _____ Left Eye _____ Both Eyes _____

Cognitive Disabilities

Is the applicant able to consistently state his/her name, home address, and home or emergency telephone numbers upon request?

Yes No

If No, please explain _____

Is the applicant able to recognize a destination or landmark?

Yes No

If No, please explain _____

Is the applicant able to handle unexpected situations or an unexpected change in routine?

Yes No

If No, please explain _____

Is the applicant able to ask for, understand, and follow directions?

Yes No

If No, please explain _____

Is the applicant able to safely and effectively travel through crowded and/or complex facilities?

Yes No

If No, please explain _____

Can the applicant negotiate roadway crossing safely and independently?

Yes No

If No, please explain _____

Other Factors

(This information is required for all applicants)

Please describe any other functional limitation(s) with respect to bus travel. Please be specific.

Can the applicant read and/or understand information signs?

Yes No

If No, please explain _____

Does the applicant require a Personal Care Attendant (PCA) when traveling?

Note: A PCA is someone who is designated or employed by a person with a disability to assist that person in meeting his or her personal needs and/or to facilitate travel for a specific trip. A service animal is trained to provide assistance and is not a pet.

Yes No Sometimes

If Sometimes, please explain:

Please identify any special requirement of the applicant, particularly the need to travel with a respirator or portable oxygen supply.

Please describe are any other aspects of the applicant's disability that might effect travel.

The information obtained in this Americans With Disabilities (ADA) certification process will only be used by the LAREDO TRANSIT MANAGEMENT INC. DBA EL METRO to determine the applicant's eligibility for Paratransit demand response transportation services and will only be shared with other transit providers or transportation programs to facilitate travel and/or coordinate services. This information will be kept confidential and will not be used for any other purpose, unless authorized in writing by the applicant.

I understand that Disability Verification by a qualified professional does not guarantee eligibility, but it can play a major role in the eligibility determination process. Therefore, I hereby certify that I am familiar with the applicant's particular disability and with the applicant's ability or inability to travel on the EL METRO's regular bus system.

EL METRO staff is hereby authorized to contact me or staff members in my office if necessary, to complete the eligibility determination process according to ADA implementing regulations (i.e., CFR Parts 37 and 38). I also agree to provide any and all evidence or documentation deemed necessary by EL METRO for a final eligibility determination for Paratransit demand response transportation service or a subsequent appeal.

I certify that the statements I have made herein are true and correct, and understand that false or fraudulent statements and certifications are punishable by law under 18 U.S.C. Subsection 1001 (1982).

Signature _____ **Date** _____

Name (please print) _____

Address _____

City _____ State _____ Zip Code _____

Office Telephone Number _____ Fax: _____

Licensing Identification# _____

FOR OFFICE USE ONLY:

New Application Yes No Recertification Yes No

Applicant's Name: _____

Applicant's Address: _____

Determination: _____ ADA NO. _____

Expiration Date: ____/____/____

Assessment Date: ____/____/____

Interview Date: ____/____/____

Interviewed By: _____ Date: ____/____/____

Approved By: _____ Date: ____/____/____

Status: _____

Eligibility Category: _____

Temporary Yes No Duration(months): _____

Client's ID: _____

Comments: _____

FOR APPEAL USE ONLY:

DATE CONTACTED: ____/____/____ **BY:** _____

APPEAL DATE: ____/____/____

DETERMINATION: _____

Appendix G

Sample Eligibility Determination Letters



Laredo Transit Management Inc.

1301 Farragut Street, Laredo, TX 78040-4902 • (956) 795-2288 • (956) 795-2258

October 2, 2012

Dear El Lift Applicant:

Recently you participated in a functional evaluation to determine your ability to use El Lift transportation service. As a result of that evaluation, you were found eligible for El Lift Services.

To complete the application process you will now need to stop by our office to obtain your El Lift Identification Card (ID).

Transit Center
1301 Farragut St (Main Lobby)
Laredo, Texas 78040

If you have any questions, please call our Customer Service Center at (956)795-2280, Monday through Friday between the hours of 8:00am and 5:00pm.

Sincerely,

Oscar Gomez Jr.

Letter of Determination

Effective on September 2012



Laredo Transit Management Inc.

1301 Farragut Street, Laredo, TX 78040-4902 • (956) 795-2288 • (956) 795-2258

October 02, 2012

Dear El Lift Applicant:

Recently you participated in a functional evaluation to determine your ability to use El Metro Lift transportation service. As a result of that evaluation, you were found not eligible for El Metro Lift services.

If you feel this decision is not truly reflective of your functional abilities to use accessible public transportation, you have the right to an in-person appeal of the decision. Enclosed, for your convenience, is an Appeal Request Form, Which must be filed within 60 days of your initial certification determination letter. Please return the completed Appeal Form:

Mail To: El Metro
1301 Farragut St.
Laredo, Texas 78040

The Americans with Disabilities Act (ADA) entitles you to have an impartial in-person hearing independent of the initial evaluation. Your appeal will be assigned to an appeal specialist qualified to evaluate the functional issues you present at your appeal.

You will be notified within 30 days of the completion of your appeal of the decision. If a decision is not made within the 30 day period after your appeal, you will be given temporary eligibility until the decision is made. The appeal decision is the final determination of eligibility.

If you have any questions, please call our Customer Service Center at (956)795-2280, Monday through Friday between the hours of 8:00am and 5:00pm.

Sincerely,

Oscar Gomez Jr.

Appeal Letter
Effective on September 2012

Appendix H
Appeal Request Form

EL LIFT SERVICES APPEAL FORM

If you disagree with your eligibility determination for EL Lift Services, you have the right to appeal this decision within 60 days of your initial certification determination letter. Your original eligibility determination will remain in effect until a final decision is made and your appeal is closed.

Please return your completed Appeal Form to:

El Metro
Attn: El Lift Eligibility Service
1301 Farragut St.
Laredo, Texas 78040

El Lift ID Number: _____

Last Name: _____ First: _____ MI: _____

Home Address

Street: _____

City: _____ State: _____ Zip: _____

Daytime Phone: (____) _____ Evening Phone: (____) _____

What is your Disability?

Please explain why you think the transit evaluation decision is incorrect and why you cannot use the city line bus:

Which of the following mobility aids or equipment do you use?

____ Power Wheelchair ____ Manual Wheelchair ____ Cane
____ Walker ____ Scooter ____ Service Animal Other: _____

I certify that the information I gave is true and correct. I understand that falsification of information may result in denial of service. I understand all information will be kept confidential and only this information required to provide the services I request will be disclosed to those who perform those services.

Signature: _____ **Date:** _____

Person, Other Than Appellant, Completing Form

I certify that the information provided in this questionnaire is true and correct base upon information given me by the appellant or based upon my own knowledge of the appellant's disability.

Signature: _____ **Date:** _____

Print name: _____

Address: _____

Phone: (____) _____ Relationship: _____

Note: If the appellant is under the age 18 on the date of form is signed or if the appellant has had a guardian or conservator of the person appointed for them, this form must be signed by a parent, legal guardian or conservator.

Signature: _____ **Date:** _____

Print Name: _____