



# EAGLE COUNTY

## TRANSIT DEVELOPMENT PLAN



## APPENDIX F

# REVIEW OF PARATRANSIT SERVICES

September 2017



# EAGLE COUNTY

TRANSIT DEVELOPMENT PLAN





*Cover photo: Vail Times*





# TABLE OF CONTENTS

**INTRODUCTION..... 1**

**PARATRANSIT SERVICE MODEL ..... 1**

**ELIGIBILITY DETERMINATION ..... 1**

**CALL CENTER FUNCTIONS AND SUPPORTING TECHNOLOGIES ..... 3**

**FLEET AND DRIVERS ..... 5**

**OPERATIONS/MAINTENANCE FACILITY ..... 6**

**MISCELLANEOUS SERVICE DELIVERY POLICIES, DEFINITIONS, AND PERFORMANCE STANDARDS ..... 6**

    No-Shows ..... 6

    Late Cancellations and No-Show Policy..... 6

    Missed Trips..... 7

    Level of Driver Assistance..... 7

    Driver Wait Time ..... 7

    Return Trips for Late-Running Appointments ..... 8

    ETA Calls..... 8

    Capacity Limitations..... 8

    Denials ..... 8

    On-Time Performance..... 8

    Excessively-Long Trips ..... 9

    Missed Trips..... 9

    Average Hold Time ..... 9

**COMPLAINTS AND COMPLAINT MANAGEMENT..... 9**

**SAFETY ..... 10**

**PUBLIC INFORMATION ..... 10**

**MISCELLANEOUS OBSERVATIONS..... 11**

## INTRODUCTION

Under the Americans with Disabilities Act (ADA), Eagle County Regional Transportation Authority (ECO Transit) is obligated to provide ADA complementary paratransit. ECO Transit is obligated to provide paratransit service where and when it provides fixed-route transit service to individuals who are certified as ADA paratransit eligible. Eligibility for paratransit is based on a person not being able to access or use ECO Transit's fixed-route service because of their disability or disabilities.

## PARATRANSIT SERVICE MODEL

All aspects and function of the paratransit service are the responsibility of ECO Transit. It is a totally in-house system.

- **ADA Paratransit Service Area** – With  $\frac{3}{4}$  mile of fixed route transit corridors
- **ADA Paratransit Service Days and Hours** – Service is provided daily from 4:00 am to 2:45 am. Staff interviewed stated that the service is available daily from 4:30 am to 2:00 am, although the “core hours” usually consist of one to two vehicles in service on 8-hour shifts between 6:00 am and 6:00 pm. If earlier or late trips are requested, they are served by back-up drivers. Note that these hours are not detailed in the user guide.
- **ADA Paratransit Fare** – Paratransit service is free. Guests six years of age and over however are charged the equivalent of the fixed route fare. Paratransit customers may also ride ECO Transit's fixed route service for free.

## ELIGIBILITY DETERMINATION

Eligibility determination is the responsibility of ECO Transit, and is conducted with a traditional paper application. Part 1 of the application is completed by the applicant, and Part 2 is completed by the applicant's health care professional. In the User Guide and on the ECO Transit website, there is information about how to request an application, and that there is a 21 day response time. A letter of acceptance is usually sent out within 5 days of the receipt of the application. After receiving both completed parts, a determination is made by ECO Transit's Operations Manager. In the General Information Request (GIR) response, the statement was made: “Any application that is received with a valid physician's signature is qualified.” This indicates that there is very little scrutiny on the part of ECO Transit.

Applicants are deemed to be unconditionally eligible or not eligible for paratransit service, and the appropriate letter is sent to the applicant based on the determination. There is an appeals process for the latter (and noting the 60 days) mentioned in the user guide, but it is not spelled out in the user guide and mentioned only in passing on the eligibility form. The GIR response says that there are directions for appealing the decision included with the letter. Transportation is provided if there is no decision within 30 days of receiving the appeal request, but this does not appear to be noted in the eligibility materials or user guide. Further, even though conditional eligibility is mentioned in the user guide, it would appear that no one has received conditional eligibility; there is also not a template letter for conditional eligibility.



## EAGLE COUNTY TRANSIT DEVELOPMENT PLAN

For applicants who are certified as unconditionally eligible, ECO Transit's Paratransit Coordinator (who is also the lead driver, and also fine-tunes the schedule after the reservations hours and again the day of service early in the morning) will then visit the new customer in his/her home to go over the user guide and to determine any home-based idiosyncrasies that may impact the delivery of service. New customers are provided with a photo ID with a three-year expiration date. Sixty days prior to the expiration date, a notice goes out to customers who need to be re-certified.

There has only been one denial for an applicant within the paratransit service area within the last few years. There may be paratransit applicants who see the lax application process as a way to get free transit.

There is no information in the user guide about visitor eligibility. The GIR response mentions that visitors are able to use the paratransit service as soon as documentation is reviewed by the Operations Manager, but there is nothing in the user guide or website that tells a prospective visitor how to go about this. There is also nothing in the user guide about presumptive eligibility in the event that the 21 day turn-around is not met or about how to appeal.

### Items for improvement:

- (1) ECO Transit should add an e-mail address to the contact information, as not many people fax any more.
- (2) Information about accessible formats and how to request them should be added to the user guide and website information. Also, all applicants, as part of the eligibility process, should indicate a preferred alternative format for all ECO Transit communications
- (3) Staff visiting homes should provide the customer with the paratransit service user guide also the ECO transit schedule/map so that customers have somewhat of an idea as to where the ADA paratransit service area.
- (4) ECO Transit should provide an ADA service area map in its materials and on its website. This should change as the fixed-route schedules change.
- (5) ECO Transit should track key dates, including the date the application is received and the date the letter of acceptance is sent, evidencing that ECO Transit is achieving its goal of responding within 21 days.
- (6) Information about presumptive eligibility in the event that the 21 day turn-around is not met should be added to the user guide and eligibility information.
- (7) Information on how to appeal a determination of ineligibility or conditional eligibility should be added to the user guide and eligibility information.
- (8) Information on visitor eligibility should be added to the user guide and eligibility information.
- (9) All of this information should also be on the ECO Transit website and it should be accessible via most readers.



## CALL CENTER FUNCTIONS AND SUPPORTING TECHNOLOGIES

Call Center functions (Reservations, Scheduling, Dispatching and Handling Customer's Same-Day Trip Status Calls) are all handled by ECO Transit's dispatchers using RouteMatch. There are four dispatchers, whose weekly schedules provide for there to be one dispatchers on duty and any given point from 8:00 am to 5:00 daily. Same-day issue calls that are placed by customers outside of these hours but during service hours are handled by the fixed-route dispatchers.

It states in the User Guide that reservations may be requested 24 hours in advance from the requested pick-up time

### Item for Improvement:

Technically, a customer should be able to make a request for service at 4:55 pm for a trip at 6:00 am the following day. Based on the wording above, this would not be allowed. We suggest changing the wording to simply allow next-day reservations, with the same caveat about after-hour changes of next-day trips.

The user guide is silent on subscription trips, and according to the dispatcher interviewed, there are very few subscription trips.

The user guide also states that requests can be made up to 10 days in advance, and that no changes will be made after 5:00 pm for a next day booking, other than a cancellation. The dispatcher interviewed indicated that the 10-day policy really isn't observed; that in fact, dispatchers can receive up to a month's worth of trips in advance. This is often done by email. The dispatcher further indicated that they will take up to a week's worth of requests over the phone, but higher-volume request should be done by email. The dispatcher also said that she will intake requests by email but not after 12:00 noon for next-day requests.

### Item for Improvement:

ECO should decide upon an advance-reservation policy and an e-mail policy that can be consistently followed and incorporate that policy in the user guide.

In concert with FTA policy, the GIR response states that paratransit service "is provided to (at least) one other person as well as a PCA." However, in the user guide, it states that guests are only served on a space-available basis.

When placing a request, customers are conditioned to request a pick-up time, even when the trip is for an appointment. In such cases, the dispatcher will discuss the pick-up time with the customer, reminding them about the pick-up window.

Upon customer acceptance of a pick-up or drop-off time, the system-scheduled pick-up time is provided to the customer. This becomes the basis for the 30 minutes (-/+ 15 minutes) pick-up or ready window that is quoted to customer.



**Items for Improvement:**

(1) Instead of giving the customers the scheduled pick-up time, the dispatchers should give the customer the “confirmed pick-up window.” This will emphasize when the customer should be ready. This is called the “scheduling” window in the user guide and should probably be renamed as the “pick-up window or the ready window.”

(2) Nowhere in the user guide is it specifically said that the arriving vehicle will be late if it arrives after the end of this window, or how missed trips can be defined based on this window. These is discussed more below.

(3) ECO Transit should revise its guest policy so that it is in concert with its GIR response.

Scheduling is performed in real-time, i.e. while the customer is on the phone and immediately after the trip request is booked. RouteMatch is configured to offer a few suggestions for a trip assignment to a specific run (recognizing that there are rarely more than 2 runs needed for this service), but most dispatchers schedule manually without the help of RouteMatch’s suggestions. That said, ECO Transit’s Paratransit Coordinator (who is also the lead driver), does use RouteMatch’s optimization capabilities at the end of the scheduling day to fine-tune the schedule, and if a schedule adjustment moves a pick-up time, calls are made to the impacted customers. She also fine-tunes the schedule in the early morning of the day of service to optimize the service after overnight cancellations have been entered into the system.

If there are no suggested trip assignments to a run and the dispatcher cannot find a space for a trip, the dispatcher may try “trip time negotiation” which involves discussing alternative times with the customer. The ADA allows for a “useful hour” parameter, meaning that hard points in time, like the end of a work day, must be observed. If a dispatcher suggests a time within the useful hour, and the customer ends up deciding not to take the trip, this should be documented as a customer refusal. If the dispatcher finds a time beyond the useful hour, the request should still be documented as a denial, whether or not the customer accepts this time (i.e., acceptance or refusals or pick-up times after the useful hour should both be documented as denials). It is suspected that dispatchers may not be correctly following this protocol. Note also that the dispatcher reported that dispatchers try to find space within a usable half hour, and if unsuccessful, may dispatch a back-up driver to serve the trip.

**Item for Improvement:**

If the above is true, it is possible that there truly are no denials. That said, the proper protocol should be incorporated into a SOP manual.

The telephone system used by the dispatchers is used to intake trip requests as well as calls about same-day issues (such as an ETA call). With only one dispatcher, there are calls that, after 5 rings, get rolled-over to the customer service center in Vail. Caller information is then recorded by the CSR and the CSR then attempt to call the dispatcher back. It is difficult to ascertain whether or not this situation constitutes a capacity issue or not.

One policy that could help the call volume is that dispatchers are providing ETA information to customers who call for ETAs prior to the end of their pick-up window. While this is a very nice in terms of service quality, it can actually backfire for customers. Many “early” ETA calls not only take up the phone line and the dispatcher time, but in many cases, the driver actually arrives



within the pick-up window. Meanwhile, a customer who appropriately waits until the van is late may not be able to get through, with his or her call bounced to Vail without resolution.

**Items for improvement:**

(1) Without a supporting telephone MIS to report on such instances, the Vail CSRs should record how many trips per day refer to the paratransit service, and date and time stamp these requests in the log.

(2) ECO Transit should revise its policy on ETA calls and make it clear to customers that they should not call before the end of their pick-up window. For early calls, responses from the dispatchers should be, “it is currently scheduled to arrive within the pick-up window, please call back if it has not arrived by the end of the pick-up window.”

At the time the review was conducted, the AVL system and the radio system back-up system was not properly working. Thus, the only real way to contact paratransit drivers on the road was by calling their cell phone. ECO Transit is working to replace the in-vehicle communication/AVL equipment (tablets) with new tablets to resolve this issue.

Without the tablets working properly, trip manifests – and changes -- cannot electronically be sent to a vehicle. Instead, drivers have been working from paper manifests., with manifest information entered into RouteMatch at the end of the day.

Paper manifests are limited in terms of the space available for key fields like the address. Using standard sized paper (8-1/2' x 11), essential information is chopped off, which can sometimes lead to driver confusion, which is exacerbated by the limited ways that drivers can now communicate with dispatchers while in the field.

Finally, ECO Transit has an IVR system that it intends to use for prior day evening confirmation calls, but at present is not working. Once the IVR system and the tablets are in place, ECO Transit should look into using the IVR to make GIS-based “imminent arrival calls.”

**Items for improvement:**

(1) Until in-vehicle communications is restored, dispatchers should printout manifests on legal size paper (8-1/2” x 14”). This should provide for some extra space for key missing information.

(2) It seems as if are several IT-related issues that are hampering paratransit service, and several IT opportunities to improve customer service that are still on the shelf. ECO Transit should consider expanding its IT department to include an IT person who is fluent in RouteMatch, in-vehicle tablets, IVR, etc.

## FLEET AND DRIVERS

ECO Transit’s paratransit fleet consist of the following vehicles:

- Two accessible body-on chassis vehicles (one diesel powered and one gas powered)
  - The newer gas-powered vehicle is larger; it can hold up to two wheelchairs and 14 ambulatory passengers if there are no passengers using wheelchairs, 12 if one wheelchair, and 10 if two wheelchairs.



- The older diesel powered vehicle is smaller and can hold two wheelchairs and six ambulatory passengers.
- One non-accessible gas powered van, with seating for seven passengers.
- Three back-up larger accessible diesel-powered buses that can be utilized as needed.

There are two primary paratransit drivers, one of whom is also doubles as the Paratransit Coordinator. (She is the person who visits new customers and fine-tunes the scheduling after the reservations period on the evening before the trip and again on the day of service before the vehicles go out.) There are also eight back-up drivers.

Both drivers work a 40 hour base weekly shift.

- The lead driver works Monday-Friday, typically with 8-10 hours sandwiched between 6:00 am and 6:00 pm. If Fridays are light (which they typically are), she might not come in at all or work a reduced shift.
- The second driver works Tuesday – Saturday, with 8 hour shifts sandwiched between 8:00 am and 8:00 pm.
- Back-up drivers are used as needed in the early morning, evenings, and Sundays.

## OPERATIONS/MAINTENANCE FACILITY

ECO Transit’s operations/maintenance facility is located in Eagle. The facility has sufficient room to house the call center and administrative and support functions. It provides secure vehicle storage for the vehicle fleet and also houses the vehicle maintenance. It also has a fuel island where both gas and diesel is dispensed.

## MISCELLANEOUS SERVICE DELIVERY POLICIES, DEFINITIONS, AND PERFORMANCE STANDARDS

### NO-SHOWS

The definition of no-show in the user guide is correct. A key bullet is the vehicle arriving on-time. Dispatchers are incorrectly documenting no-shows for trips when the vehicle is late. This is a missed trip. Note also that checking with the driver to make sure s/he is in the right place, and to give them authorization to proceed (after attempting to contact the customer) has become difficult when the tablets not working properly and without radio communications.

**Item for improvement:**

A missed trip definition should be added to the user guide.

### LATE CANCELLATIONS AND NO-SHOW POLICY

A late cancellation is defined as a cancellation that is telephoned in within 2 hours before the scheduled pick-up time (vs. two hours before the beginning of the confirmed pick-up window). A



late cancellation constitutes a “failure to board” similar to a no-show or a cancel-at-door. A pattern of such failures may result in a suspension as detailed below.

This policy, as stated in the user guide, indicates that late cancellations or no-shows within a rolling 30 day period may result in a suspension of two-weeks. The policy further specifies longer suspensions for continued patterns. In practice, no customer has ever been suspended, and there has only been one customer who has been sent a warning letter.

**Item for improvement:**

FTA policy suggests that the policy thresholds should be based on a percentage of use, rather than an absolute number of late cancellations and/or no-shows, and that that the longest suspension should be no more than a month.

## MISSED TRIPS

Another related issue, as mentioned above and confirmed by the dispatcher interviewed, is that missed trips are being incorrectly labeled as no-shows, i.e., no-shows can only occur when the vehicle is on time and not when the vehicle arrives late.

**Item for improvement:**

ECO Transit needs to adopt a definition of missed trip (an adequate one appears in its GIR response but has not been operationalized); this includes making sure that dispatchers and drivers know the difference between a missed trip, no-show, and cancel-at-door, and that RouteMatch has a disposition for missed trip.

## LEVEL OF DRIVER ASSISTANCE

Based on the user guide, the default level of paratransit service is curb-to-curb. Door-to-door service can be requested by customers, conforming to “origin-to-destination” policies promulgated by FTA. That is, ADA paratransit is an “origin to destination” service and drivers shall assist passengers between the door of the origin and destination and the vehicle, as needed. And while a section called “Limited Door-to-Door Assistance” is in User’s Guide, it comes well after curb-to-curb service is first discussed.

**Item for improvement:**

The user guide should be revised to better explain origin to destination service and describe how door-to-door service and other reasonable modification requests can be made.

## DRIVER WAIT TIME

The definition of this and examples in the user guide are good. As noted above, checking with the driver to make sure s/he is in the right place, and to give them authorization to proceed (after attempting to contact the customer) has become difficult with no working tablets and no radio.



## RETURN TRIPS FOR LATE-RUNNING APPOINTMENTS

The policy on this in the user guide, including the one-hour maximum response time for an ensuing “will-call,” is appropriate.

## ETA CALLS

There is no policy in the user guide for placing ETA calls. Responding to ETA calls is not specifically required under the ADA but it is a good customer service element, if properly done. Currently, dispatchers respond to all ETA calls, no matter when they are placed. Note also that this has become difficult with no working tablets and no radio.

### Item for improvement:

The user guide should be revised to include a policy on ETA calls and the policy should specifically state the customers are not to call for an ETA until after the pick-up window. See the discussion above.

## CAPACITY LIMITATIONS

It seems unlikely that ECO Transit’s paratransit service is experiencing a capacity limitation. Still, it behooves ECO Transit to periodically (monthly) check into the following metrics that could possibly indicate a capacity limitation – or prove that there isn’t a constraint.

## DENIALS

ECO Transit’s target for denials is zero, per the GIR response. As discussed previously, denials can include a flat-out denial because there is no room on any of the rooms, but it also occurs when trip negotiations result in an offered pick-up time that is beyond the useful hour, regardless of whether the customer accepts the offering or not.

### Item for improvement:

The definition of a denial needs to be adopted by ECO Transit and operationalized and tracked, noting that denials may not be in fact happening because of current procedures.

## ON-TIME PERFORMANCE

ECO Transit’s on-time performance (OTP) standard at 90%, which is a bit low considering its 30 minute window. Typically, a 95% on-time performance should be achieved within a 30 minute window. And indeed, in CY 2016, the paratransit service achieved nearly a 97% OTP (94.4%) if early trips and on-time trips are combined. This implies that there is not a pattern of late trips. However, it is difficult to state this convincingly if there is no practice of checking to see if there is a pattern, even if the standard is exceeded. Also, regarding accuracy, RouteMatch or the processes that are used to enter service data into RouteMatch given that the tablets are not working, and RouteMatch produced inconsistent numbers for CY 2016.



**Item for improvement:**

ECO Transit should adopt monthly procedures to see whether there are patterns of lateness for certain customers, for certain areas, and for certain times.

## EXCESSIVELY-LONG TRIPS

The definition in the GIR response is adequate, however there is no established standard for the percentage of excessively-long trips that is acceptable. In addition, there are no periodic checks on longer trips (past the RouteMatch scheduling parameter) or shorter trips to establish whether or not there is a pattern of excessively-long trips.

**Items for improvement:**

ECO Transit should adopt (1) a standard of there being no more than X% that are excessively-long; and (2) establish monthly procedures to examine long trips.

## MISSED TRIPS

As mentioned above, missed trips are correctly defined. However, the documentation of missed trips has not been operationalized.

**Item for improvement:**

ECO Transit should (1) ensure that dispatchers and drivers know the difference between a missed trip, no-show, and cancel-at-door, (2) ensure that RouteMatch has a disposition for missed trip, (3) that missed trips are reported appropriately; and (4) adopt a standard (maximum of 0.5% is suggested).

## AVERAGE HOLD TIME

Based on FTA policy, there is a capacity deficiency if access to the paratransit service is limited. A common metric used to evidence achievement of this is average hold time. However, ECO Transit does not have a telephone MIS that reports on hold times.

**Item for improvement:**

As suggested above, ECO Transit should begin tracking the number of paratransit calls answered in Vail and should begin documenting related complaints. See below.

## COMPLAINTS AND COMPLAINT MANAGEMENT

While ECO Transit staff take complaints from paratransit customers and other ADA-related complaints seriously, and often gets back to the customers within a matter of days, there is nothing evidencing this. There is no paper or electronic trail of the complaints, the ensuing investigations, and the date and details about the response to the complainant, including what is being done so that the occurrence triggering the complaint does not happen again. In short, ECO Transit is not tracking complaints and their resolution. This is an ADA compliance issue.



**Items for improvement:**

ECO Transit should (1) revise its complaint intake form to include all types of ADA-related complaint associated with paratransit and the fixed route system; (2) instruct all dispatchers and customer service agents to document complaints on the form; (3) document the investigation of the complaint and resolution, as well as any re-training of employees that results from the complaint; (4) track all relevant dates, including the intake date and the response date; and (5) provide information to customers and the public on how to make a complaint. ECO Transit should also adopt an internal Complaint Frequency Ratio scale.

## SAFETY

While ECO Transit does track accidents for paratransit and differentiates between preventable and non-preventable accidents, ECO Transit does not have a PAFR standard.

**Item for improvement:**

ECO Transit should establish a PAFR standard of no more than 1.0 preventable accidents for every 100,000 total miles.

## PUBLIC INFORMATION

There is much in this area that would be considered “deficient” by an FTA Triennial reviewer. For example:

- There is no information about how to request alternative formats for eligibility information, the user guide, notices, etc.
- There is no information that explains reasonable accommodation and how a customer might request a reasonable accommodation
- There are no e-mail addresses for requesting trips or for requesting information
- There is no ADA paratransit service map, nor helpful information for a customer to figure out service hours
- There is no information about presumptive eligibility, visitor eligibility, and how to appeal a decision about an eligibility determination or a suspension
- There is no information about how to register a complaint and the complaint process
- There is no information about the standards of service performance, and missing definitions of key metrics

After the user guide has been revised per the suggestions herein, the user guide should be put on the ECO Transit website, and ECO Transit should work with the disability community, and especially individuals with visual impairments who use readers in order to ensure the web site’s accessibility.

## MISCELLANEOUS OBSERVATIONS

The following observations and suggestions are in addition to the suggested “items for improvements” discussed above.

### **Assign an ADA Coordinator**

Judging from the inconsistencies between the user guide and the GIR, the incomplete information that is available to customers and the public, the lack of ongoing analysis, and other issues, there is a need for an ADA Coordinator to ensure compliance for the paratransit services as well as the fixed-route system. This person would also be responsible for liaising with the ECO Transit IT department and/or directly with software/hardware vendors and would also be responsible for all eligibility functions. This could be a part-time position.

### **Revise the User Guide**

The user guide is in need of an overhaul. Several suggestions have been provided herein. ECO Transit can also look at other exemplary user guides from other transit agencies.

### **Prepare an SOP Manual for Paratransit Services**

ECO Transit should develop a Standard Operating Procedures (SOP) manual. This manual should cover all functions, and ensure that managers, dispatchers, paratransit drivers, and road supervisors are all on the same page with respect to policies and daily, monthly, and annual procedures. Driver duties are detailed in a Paratransit Safety Manual that the current Paratransit Coordinator uses as a “referral tool” when she trains new drivers. This and the user guide, as revised per this review, could be combined to serve as a point of departure for the SOP manual. However, ECO Transit should seek out other paratransit driver training manuals as there is much missing.