

ADA Program Assessment and Evaluation

of the Bay Area Transportation Authority (BATA)

FINAL REPORT



BATA
Bay Area Transportation Authority

KFH
GROUP

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Prepared for the
Bay Area Transportation Authority

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Introduction

This report provides a summary of the ADA Program Assessment and Evaluation study conducted for the Bay Area Transportation Authority (BATA) over an eight-month period from July 2020 to February 2021 by the KFH Group.

Following this Introduction, the report outlines the study process, gives a brief background and context for the study, and summarizes the key findings of the study within sections that correspond to the tasks of the study.

The detailed findings and documentation of the study's efforts are provided in a separate report, titled "Technical Appendices to the Final Report of the ADA Program Assessment and Evaluation." That report includes the five Technical Memoranda produced while conducting the study.

Purpose of Study

As provided in the Statement of Work for the study, BATA was seeking a comprehensive assessment of its operations from the perspective of the Americans with Disabilities Act (ADA). The transit agency asked for a review of its operations and supporting facilities and infrastructure to assess compliance with ADA requirements and with a clear interest in improving its transit services for individuals with disabilities.

The Statement of Work for the study is noteworthy in that it addresses not only ADA requirements for transit services but also transit facilities and infrastructure. This is a more holistic approach than conducting separate studies that assess ADA compliance with transit services separately from the transit infrastructure.



The image contains four vertical rectangular boxes, each with a different background color and a circular icon at the top. Below each icon is a short paragraph of text. From left to right: 1. Light blue box with a circular icon showing a map, a bus, and a person in a wheelchair. Text: "Goal of improving transit services for individuals with disabilities". 2. Light green box with a circular icon showing a magnifying glass over a checklist. Text: "Comprehensive review of BATA operations from an ADA perspective". 3. Light grey box with a circular icon showing a bus stop shelter, a bus, and a person in a wheelchair. Text: "Review of supporting facilities and infrastructure to assess ADA compliance". 4. Light yellow box with a circular icon showing a person in a wheelchair at a bus stop. Text: "Holistic approach recognizes that making transit service accessible requires accessible infrastructure".

Goal of improving transit services for individuals with disabilities

Comprehensive review of BATA operations from an ADA perspective

Review of supporting facilities and infrastructure to assess ADA compliance

Holistic approach recognizes that making transit service accessible requires accessible infrastructure

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The unified approach also implicitly recognizes that in order to make transit service accessible to people with disabilities, the infrastructure that supports transit must also be accessible. Research has shown that the inaccessibility of sidewalks and pathways to and from bus stops and stations are among the primary factors that discourage and impede the use of fixed route transit by people with disabilities.

Study Process

The study involved the following components:

- **ADA Baseline:** The objective of this task was to gain an overall understanding of BATA's services and facilities in relation to ADA requirements based on interviews and discussions with BATA managers. The intent of these discussions was to obtain the managers' understanding and perspectives regarding the agency's compliance with the ADA and its requirements under the U.S. DOT implementing regulations. (Task 1)
- **Community and Constituency:** This task was designed to gather input from the disability community regarding BATA's services and their accessibility to riders with disabilities. BATA wanted to know "what's working, and what's not." (Task 6)
- **Policy, Procedure and Practice:** Efforts in this component of the study focused on BATA's policies, supporting procedures and, where we had relevant information, day-to-day practices related to complying with the ADA. (Task 4)
- **Media and Technology:** This effort was intended to review customer-facing information, such as that on the website, as well as signage, and to review BATA's policies related to service for riders with disabilities and the process for assessing riders' experiences. (Task 5)
- **Facility Compliance:** The intent of this study component was to review the Hall Street Transit Center's compliance with ADA regulations for facilities. (Task 2)
- **Field Access:** This task was designed to assess BATA's field-based structures and their compliance with the ADA, focusing on bus stops, shelters and pathways. (Task 3)
- **Paratransit:** BATA requested that this task outline a process for the agency to transition to a stand-alone paratransit service from current paratransit services. (Task 7)
- **Presentations:** The study's last task involved developing a final report documenting the study's efforts and findings as well as preparing and providing a presentation of the study's findings. (Task 8)

Study Background and Context

The Americans with Disabilities Act

The Americans with Disabilities Act (ADA) is comprehensive civil rights legislation, providing a framework for ending discrimination against people with disabilities. Title II of the Act addresses public services, with a primary goal of providing public services in the most integrated manner.

For public transportation agencies, this means ensuring a fully accessible fixed route system, along with complementary paratransit for those individuals with disabilities who are prevented from using fixed routes due to disability. The ADA also requires accessibility improvements to the transit infrastructure, including bus stops and stations.

BATA provides public transportation services in Traverse City and throughout surrounding Grand Traverse and Leelanau Counties. Its mission is to provide “safe, high-quality, efficient, and reliable transportation services in its region that link people, jobs, and communities.” The agency is committed “to providing affordable, convenient and environmentally-friendly transportation to our community members,” which includes those with disabilities.

The U.S. DOT ADA regulations provide a framework for ensuring that BATA’s services are available and accessible to its community members with disabilities and, importantly, ensure that the transit agency is in compliance with the law and regulations. BATA has demonstrated its commitment to community members with disabilities with various services, policies, and procedures and its ongoing support of and consultation with the Local Advisory Council (LAC), which represents the interests of seniors and people with disabilities. The initiation of this study is another testament to BATA’s commitment to the community and its members who have disabilities.

Comprehensive civil rights legislation, enacted in 1990

Requires fully accessible fixed route transit service

Complementary paratransit for those whose disabilities prevent use of the accessible service (ADA paratransit)

Accessibility requirements for public facilities and bus stops

ADA regulations for public transit are many and prescriptive

Findings of the Study

ADA Baseline: BATA's Alignment with the ADA

This study effort involved several steps that reviewed the alignment between ADA regulations and/or guidance as issued by the Federal Transit Administration (FTA) with BATA's operations. This was accomplished by assessing ADA requirements in the key functional areas of transit service as represented by the manager and the manager's understanding of the ADA in that manager's functional area.

The functional areas reviewed include:

- Fleet maintenance and vehicle purchasing
- Transit planning including customer outreach, information, and feedback
- Fixed route service
- Demand response/paratransit service
- Mobility management
- Bus stops and shelters
- Transit facilities

As one example to explain the process we followed in conducting this task, we interviewed the manager of fleet maintenance to review the manager's understanding of the specific ADA requirements regarding vehicle maintenance and discussed and then documented the alignment of BATA's maintenance policies and practices with those requirements based on the interview discussion. This was repeated for the other functional areas listed above.

Detailed findings of those interviews by functional area are provided in the Technical Appendices to the Final Report. Based on the interviews, we found that in most cases BATA's operations conform with the ADA. BATA has developed policies, procedures and practices that meet ADA requirements in several areas. Managers were aware of the ADA and what the ADA generally requires in their functional area. Specific issues related to ADA compliance that merit more attention are identified in the Technical Appendices and subsequent study tasks focused attention on those specific areas.

Community and Constituency: Outreach to the Disability Community

An early task in the study involved outreach to obtain input from riders with disabilities, their advocates as well as agencies that serve individuals with disabilities concerning BATA's services and their effectiveness and accessibility for those with disabilities. Such outreach is important to help understand, as BATA stated in its Statement of Work for the study, "what's working and what's not" in meeting the needs of riders with disabilities.

Outreach efforts included the following:

- A meeting with BATA's Local Advisory Council (LAC), held virtually due to the coronavirus pandemic.
- Follow-up interviews with individual members of the LAC.
- Participation in meetings with two disability organizations in the Traverse City area, again virtual meetings.

Comments Received

We received a range of comments through the outreach activities, documented in detail in the Technical Appendices, many providing positive feedback about BATA services as well as comments that identify issues of concern from the commenters' perspective. We accepted the comments at face value and recorded them without any attempts for validation and note that they do not represent the study's assessment of BATA's services for people with disabilities. It is, nevertheless, important to reach out and hear from the disability community when assessing transit services for people with disabilities.

A number of comments spoke favorably about the accessibility of BATA's physical assets, for example, vehicles and bus stops, which support use by riders with physical disabilities. Other comments expressed concerns about the need for attention and sensitivity to riders with all types of disabilities, particularly cognitive and behavioral.

There were a few comments about the need for more support for riders with disabilities, including the need for sensitivity training for drivers. A designated point of contact at BATA for riders with disabilities, particularly cognitive and behavioral disabilities, was suggested as a useful improvement. Support for seniors to learn how to use transit before they have to "give up the car keys" was another comment. And it was noted that riders' comments and complaints are channeled through the dispatch office, with concern expressed that this might lead to retaliation against riders providing complaints.

Feedback was provided about BATA's overall service network as well as about the different services. Regarding the overall network of service, there were comments about the more limited

A sample of the positive comments about BATA's services included:

"BATA is very open to addressing access issues for people with disabilities."

"Drivers are very helpful."

"Drivers care about their riders."

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transit services in the rural parts of BATA's service area and the sense that overall service seems designed more for visitors and tourists to the area, rather than for the residents.

We note that BATA is pursuing a survey targeted specifically to its riders with disabilities, who will be identified by their eligibility through BATA's Reduced Fare Program for Persons with a Disability. Such an effort will provide additional feedback regarding BATA's services for its riders with disabilities and supports BATA's commitment to accessible and effective transportation for people with disabilities.

Assessing Riders' Experience

BATA's focus on customer service is a major strength. This focus includes surveying riders twice annually to obtain feedback to measure riders' overall satisfaction with service as well as satisfaction with specific aspects of service, such as drivers and the call center. The biannual surveys also provide the opportunity to query riders about a specific issue, such as their opinion about changing the headway of a particular route.

Our review of survey results show that riders are generally quite satisfied with BATA's services. Judging from the Winter 2019 survey, almost two-thirds of riders are highly satisfied with BATA's services. Another third indicated they are satisfied. Only a handful of riders indicated they are not satisfied.

We also reviewed BATA's customer comment logs from 2019 through the end of October 2020. The Excel-spreadsheet logs provide considerable information, which facilitates the transit agency's ability to respond. The information provided for "Follow Up Action Needed" as well as "Status" and "Resolved By" effectively documents the efforts that staff takes to respond to riders and demonstrates a commitment and attention by the transit agency to customer input and experience.

The customer comment logs include comments related to the ADA and services for riders with disabilities. Given that BATA has developed a formal policy and process for ADA complaints, which is an ADA requirement, we suggest that ADA-related complaints be routed through the formal policy. This might involve a different placement of the ADA complaint policy on the BATA website so it is easier for riders to find, as well as instructions to the customer service representatives and dispatch staff to forward complaints related to service for riders with disabilities to the ADA coordinator.

Compliance with ADA Policy, Procedure, and Practice

ADA compliance in this task of the study was assessed based on:

- Review of BATA's documented policies and procedures, available on the website as well as provided by BATA, such as the Operator Policy and Procedure Handbook.
- Information gleaned from interviews with BATA managers as part of the first task.

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- Feedback received from BATA riders during the community outreach activities.

In addition to a review of overall BATA service, this review of ADA compliance also looked at the different BATA services separately, as many of the ADA requirements are specific to service type: fixed route, demand response, and ADA complementary paratransit. Significantly, BATA's Village Loops, which operate as route deviation for the general public, are considered demand response based on ADA regulations.

Documentation of the review is detailed and lengthy, available in the Technical Appendices to the Final Report, and summarized by the following:

Strengths

- BATA's emphasis on accessibility equipment inspection, maintenance and repair is commendable, as is BATA's concern for the safety of its passengers.
- BATA's written policies and procedures are thorough and generally compliant with the ADA regulations. Areas for improvement are specifically identified.
- BATA's overall focus on customer service is commendable. Through the discussions with management, stakeholders, and constituents, the consultant team heard this is a strength for BATA. Material in BATA's Operator Training Handbook defines core principles for inclusive customer service that provides an excellent foundation for drivers to understand the importance of providing accessible service for riders with disabilities and equal, integrated benefits.

Areas for ADA Improvement

- It appears that some of the written material regarding policies and procedures in the 2019 Operator Policy and Procedure Handbook and 2019 Operator Training Handbook would benefit from a review to ensure the information aligns with ADA requirements. This includes content related to:
 - Accommodating mobility devices
 - Wheelchair securement
 - Seat belt and shoulder harness use
 - Service animals
 - Permitting standees to use the lift
 - Allowing riders to travel with portable oxygen
 - Access to priority seating and wheelchair securement areas
- We note, however, that in a number of cases, BATA managers report that actual day-to-day practices do follow the appropriate ADA requirements.
- BATA's ADA Complaint Policy is not easy to find on the website and several adjustments

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are recommended for the policy. Complaints that relate to ADA are now reported on the customer comment logs. We suggest that such complaints should be routed through the formal ADA Complaint Policy.

- To ensure requests for ADA's requirement for reasonable modifications to policies and practices are handled with consistency, a written policy and instructions to drivers are recommended.
- Refresher disability sensitivity training is recommended for drivers, along with some updates to the terminology in the Operator Training Handbook.
- BATA's Passenger Code of Conduct and Service Denial Policy could benefit from consistent language and include information in either the BATA Operator Policy and Procedure Handbook or the BATA Operator Training Handbook regarding not denying service to an individual with a disability based on the individual's involuntary behavior being offensive but not rising to the level of a seriously disruptive or direct threat to the health or safety of others.
- The requirement related to waivers as a condition to ride without transferring from a scooter to a seat may not be allowable under the ADA regulations.
- The requirement for riders using wheelchairs for use of the lap belt and shoulder harness is only allowable under the ADA regulations if this is required for all riders.
- Based on rider feedback through our outreach activities, it appears that stop announcements are not consistently practiced by all drivers. To ensure drivers clearly understand the requirement, it is recommended that BATA add the requirement to its written policies, identify all shared stops (in addition to the transfer stations) and include instructions that drivers are to announce the route they are operating when stopping for passengers at these stops.
- Attention should be given to route deviation policies and practices. Instances when the vehicle bypasses prescheduled deviations, when the vehicle is running late, may be an issue from an ADA standpoint.
- Inaccessible vehicles are operated on the Bike-n-Ride service. If operated as true fixed route, this would be an ADA issue. As a possible solution, BATA might operate the Bike-n-Ride service on a demand response basis, e.g., on a route deviation basis for all riders, or by requiring advanced reservations for all riders. In this case, BATA would still need to acquire accessible vehicles unless the demand response system, when viewed in its entirety, "provides a level of service to individuals with disabilities, including individuals who use wheelchairs, equivalent to the level of service it provides to individuals without disabilities."

Accessibility of Media and Technology

This component of the study reviewed the accessibility of BATA's rider information materials, particularly the website, BATA's process for assessing riders' experience, and technology used to provide service.



Website

ADA regulations do not address website accessibility; however, the ADA requires that transit agencies must "make available to individuals with disabilities adequate information concerning transportation services." This means enabling users to obtain information and schedule service "through accessible formats and technology." Ensuring that the website itself is accessible is the most direct way to achieve this.

Our review finds that BATA has a beautifully presented website containing much helpful information. There are, however, some aspects of accessibility shortcomings when compared to the Web Content Accessibility Guidelines (WCAG) that are identified in the Technical Appendices to the Final Report. This includes alternative text descriptions of certain website graphics so they can be read by screen readers used by people with visual impairments. For example, a rider with visual impairments who uses a screen reader would not be able to read the information about the No-Show and Late Cancellation Policy.

The actual policy is presented as a pixelated image. A screen reader would not recognize this as text, rendering it inaccessible to someone who is blind.

No-Show & Late Cancellation Policy

BATA's No-Show and Excessive Cancellation policies help improve BATA's on-demand and dial-a-ride services by trying to limit no-shows and cancellations that can disrupt service schedules and inconvenience other passengers. [Click HERE](#) to read BATA's full No-Show Policy details. Updated: 08.19.20

Excessive Cancellation	Late Cancellation & No-Show Policy
Definition Excessive Cancellation occurs when a passenger cancels 8 or more rides within one calendar month. This refers to cancellations made 2 or more hours before the scheduled time. Late Cancellations are documented as a No-Show. Excessive Cancellations impact other passengers who are denied rides at the times being held and later cancelled.	Definition A No-Show occurs when a passenger with a ride reservation or a deviation request fails to be at the designated pick-up location, at the appointed time, and ready to travel. A Late Cancellation occurs when a passenger cancels their reservation less than 7 hours before the designated pickup time. A Late Cancellation is considered a No-Show.
Procedures Passengers are advised to reserve rides only for the days and times of the appointments or activities they are committed to attend. This policy aims to reduce the behavior of riders reserving and holding on to multiple rides in advance and then cancelling them throughout the month if not needed.	Procedures Link passengers must be at their designated pickup location and ready to travel 15 minutes before or after the scheduled pickup time - this is known as the "Be Ready Window". Any passenger not present and ready to board the bus within 3 minutes of arrival will be considered a No-Show.

Technology

BATA has adopted a technology-based paratransit service for the Traverse City area: Link On Demand has replaced City Link and provides same-day, on-demand service for the general public. Link On Demand uses scheduling software that is provided by a technology company, TransLoc, which has licensed the software to BATA. With this software, riders can schedule trips through the TransLoc website as well as a TransLoc application (“app”) and also by telephone, the more traditional method.

When TransLoc was asked about the accessibility of its app, the company indicated that the app is very useable by riders with visual impairments, with extensive user testing to ensure its usability. TransLoc reported that by the end of calendar year 2020, the app will be WCAG 2.0 ADA compliant which is the highest accessibility standard possible for mobile apps.

During consultation with BATA riders as part of study outreach, we heard that Link On Demand riders were continuing to call to schedule rides rather than using the TransLoc app. At that time, Link On Demand was still relatively new. As part of rider survey efforts, BATA should consider asking riders who have disabilities if they can effectively use the app to schedule trips on Link On Demand.

Facility Compliance and Field Access

The study’s task for Facility Compliance involved an ADA assessment of BATA’s Hall Street Transfer Station; the Cass Road Administrative and Maintenance facility was added when the work got underway. The assessment used guidelines provided in the Michigan Department of Transportation’s (MDOT) ADA Transition Plan and the 2010 ADA Standards for Accessible Design.



The Field Access task involved a review of a selected number of bus stops across BATA’s diverse urban and rural service area and assessment for ADA compliance. The task also involved an ADA evaluation of BATA’s standardized bus stop features, including shelters. The bus stop assessments were completed using guidelines from the 2011 Public Right-of-Way Accessibility Guidelines.

Efforts for these two tasks were originally planned to be completed on-site, but continuing concerns with the coronavirus pandemic and travel restrictions interrupted that plan. As

an alternative, KFH and BATA coordinated efforts so that volunteer BATA staff, with training from KFH, provided key on-site support with measurements and photographs of the two passenger facilities and a selected sample of bus stops. With these datasets, KFH assessed ADA compliance, noting strengths and issues.

Passenger Facility Compliance

Our assessment has found that BATA's transfer station and administrative facility were built with ADA accessibility in mind, and only minor considerations were noted during the evaluation. These are identified in the Technical Appendices to this report.

BATA's bus stops have been constructed using the existing accessible pedestrian infrastructure, but some locations in BATA's service area have better sidewalk coverage than others. BATA is taking an active role in funding capital improvements and coordinating with local jurisdictions to improve accessibility at and around bus stops. Considerations for ADA compliance are documented in the Technical Appendices.

Community Partnerships

In addition to BATA's role in pursuing capital improvement, BATA's launch of an Adopt-a-Stop program in 2020 is noteworthy. Partnering with approximately 20 community sponsors as of January 2021, the program focuses on snow removal and enhanced maintenance at bus shelters and stops. Various property owners also assist in snow clearing at adjacent bus stops. BATA prioritizes stops for adoption, with the first of three priorities being "ridership of passengers with mobility difficulties."



Given BATA's weather environment, dealing with snow to facilitate riders' access to transit service is and will remain an ongoing challenge. However, community partnerships, like the Adopt-A-Stop program, are an engaging and unique way to promote accessibility at and around BATA's bus stops.

Paratransit Service

BATA provides paratransit service in both the Traverse City area and the surrounding two rural counties. While BATA meets many of the requirements of the ADA, it does not currently meet all the requirements for ADA complementary paratransit, which is required for Traverse City.

Background

The ADA requires that any public entity providing fixed route service must also provide ADA complementary paratransit service (often referred to more succinctly as ADA paratransit).

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For BATA, ADA paratransit is required in the Traverse City area, where BATA operates five fixed routes, as ADA paratransit is required to complement fixed routes and provide service for people with disabilities who are unable to use fixed routes due to their disability. BATA's transit services in the outlying rural area are not required to have ADA complementary paratransit. This is because those services operate as route deviation, with deviations provided for all riders, and thus for ADA regulatory purposes, that service is regarded as demand response.

ADA regulations for complementary paratransit are very prescriptive. They require, among other regulations, that ADA paratransit provide "origin to destination service," meet six service criteria, determine eligibility for the service with a defined eligibility process, and follow ADA regulations in setting policies and procedures related to ADA paratransit.

Transitioning to ADA Paratransit

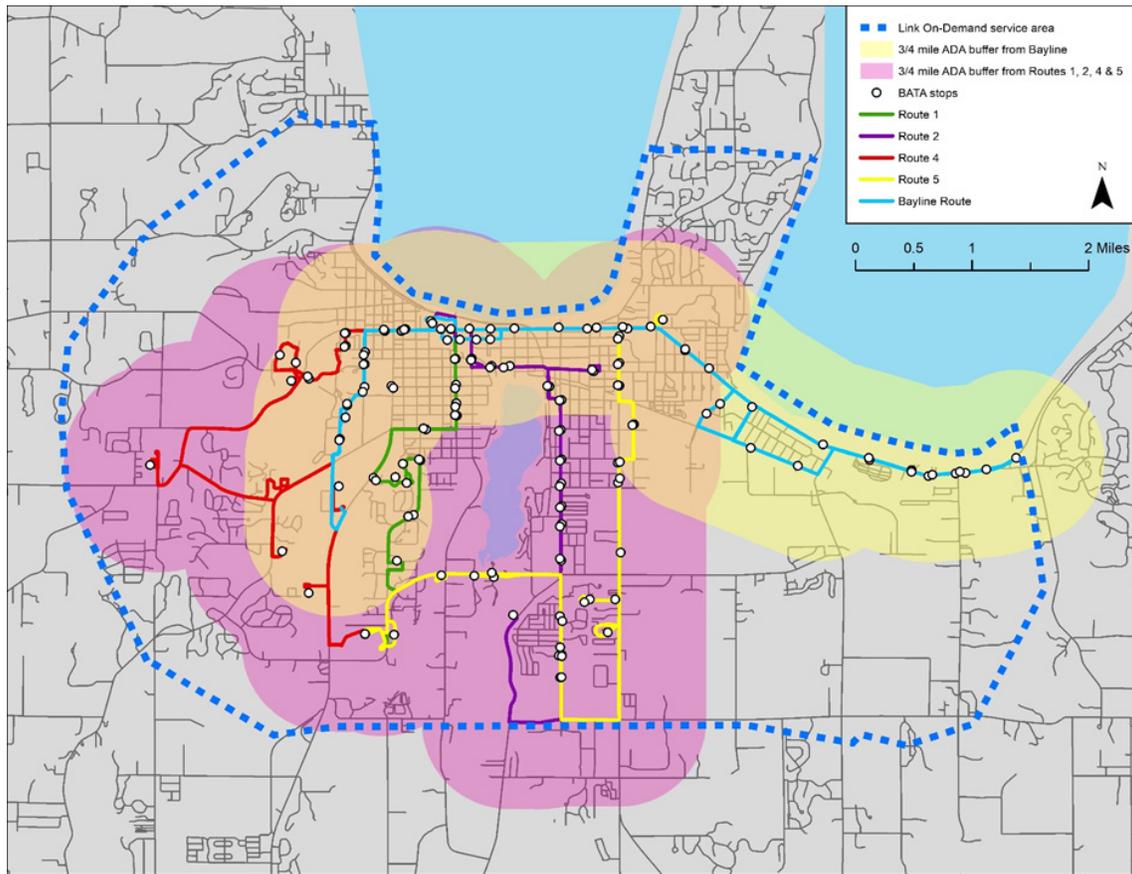
The study has detailed the steps for BATA to consider for transitioning to an ADA paratransit that meets ADA regulations. These steps are documented in the Technical Appendices to the Final Report. We note that the study's Statement of Work spoke to transitioning to a "formal stand-alone paratransit service."

However, we suggest BATA consider modifying and supplementing the current paratransit service in the Traverse City area provided by Link On Demand to meet the federal ADA requirements. We do not believe that setting up a stand-alone service to meet ADA paratransit requirements would currently be an efficient or effective use of resources.

The major issues to address for a transition include:

- Slight expansion of the current Link On Demand service area to match what is required for the ADA service area around BATA's fixed routes (the required $\frac{3}{4}$ -mile ADA buffers).
- Figure 1 on the following page compares the Link On Demand service area with the required ADA paratransit service area.
- Establishment of an eligibility certification process to determine ADA paratransit eligibility:
 - Certain aspects of BATA's current application process for Reduced Fare for Persons with Disability can be repurposed to meet requirements for ADA paratransit.
 - We do not recommend inclusion of an in-person interview or assessment as part of the certification process at this time. Suggestions for and samples of an application form as part of an outlined certification process are provided.

Figure 1: Link On Demand Service Area Compared to Required ADA Paratransit Service Area



- Monitoring performance of ADA paratransit trips by those who are ADA paratransit eligible to ensure no capacity constraints:
 - ADA paratransit trips are those booked at least one day in advance. This means they do not include the same-day on-demand trips provided by Link On Demand, even if those trips are taken by riders who are ADA paratransit eligible.
 - Meeting ADA regulations will require monitoring and providing high levels of on-time performance, among other performance measures, for ADA paratransit trips. What is key is to identify and distinguish those trips for ADA paratransit eligible riders that are ADA paratransit trips and those that are not.
- ADA requirements regarding the fare that can be charged for paratransit introduce an operational issue: one of ADA’s six service criteria for ADA paratransit stipulates that the fare for ADA paratransit can be no more than twice the regular, undiscounted fare for the comparable fixed route trip. BATA’s Bayline route is fare-free, funded in part with support from the local community. The issue is that ADA paratransit trips with an

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origin and destination within the ADA buffer of the Bayline must also be free: 2 X 0 = 0 to meet ADA regulations.

- Appeals policy: BATA's appeals policy needs to be reconsidered and modified to ensure compliance with the federal regulations. The policy is used for appeals for no-show/late cancels for ADA paratransit trips and for ADA paratransit certification.
- Providing information about ADA paratransit: Establishment of an eligibility certification process to determine ADA paratransit eligibility, differentiating ADA paratransit trips versus same-day trips (which are not subject to the same requirements as ADA paratransit) and implementing a zero fare for the ADA paratransit trips within Bayline's ADA paratransit buffer will each require clear messaging to the public, current riders, drivers, and dispatchers, to ensure it is clear which trips fall into the category of ADA paratransit and which do not.

It is worth stating that experience in the transit industry shows that ADA paratransit riders prefer same-day service over ADA paratransit's next-day service. Such service allows more spontaneous travel than provided by ADA paratransit and is considered a better level of service. This suggests that as long as Link On Demand has no capacity constraints and is able to serve all same-day, on-demand trips on a timely basis, riders with disabilities may not be interested in becoming ADA paratransit certified. And even when riders with disabilities go through the eligibility certification process and become ADA paratransit eligible, they may prefer to use Link On Demand's same-day trips. Those trips are not ADA paratransit trips. However, ADA regulations require that transit agencies that provide fixed route service have in place an ADA paratransit service, along with accompanying requirements such as an eligibility certification process.

Final Report and Presentations

Preparation of this Final Report and its Technical Appendices as well as a PowerPoint presentation summarizing the study's findings conclude our efforts for BATA's ADA Program Assessment and Evaluation.