Metropolitan Transportation Commission

March 22, 2024

Transformation Action Plan Action 25: Paratransit Eligibility Draft Report

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Subject:

MTC staff invites feedback and input from the region's paratransit coordinating councils on the draft report on Transformation Action Plan Action 25: Adopt standardized eligibility practices for programs that benefit people with disabilities.

Background:

In July 2021, MTC's Blue Ribbon Transit Recovery Task Force developed the Bay Area Transit Transformation Action Plan (Action Plan). The Action Plan identified five desired outcomes with associated near-term action items to achieve a more connected, efficient, and user-focused mobility network. One outcome was "Accessibility: Transit services for older adults, people with disabilities, and those with lower incomes are coordinated efficiently," and with it came five actions, listed in Attachment A: Transformation Action Plan Accessibility Items.

Action 25: Standardization of Eligibility Practices for Programs Benefiting People with Disabilities:

Action 25 focuses on establishing standard eligibility practices for programs that benefit people with disabilities [Regional Transportation Connection Clipper® Access program and Americans with Disabilities Act (ADA) paratransit] be established for the Bay Area.

Eligibility for both the RTC Clipper Access and ADA paratransit is based on qualifying disabilities. However, the eligibility criteria for ADA paratransit is more rigorous than the RTC Clipper Access eligibility criteria. RTC Clipper Access provides a Clipper discount on Bay Area transit. MTC and Bay Area transit agencies expanded RTC Clipper Access eligibility to include ADA paratransit eligible riders to align eligibility better. This has streamlined the RTC Clipper Access application process for ADA paratransit riders who can use fixed-route transit under some circumstances. This work was completed in September 2023 and will be rolled out in May 2024.

The larger focus of Action 25 is on standardizing the approach to determining eligibility for ADA-mandated paratransit provided by Bay Area public transit agencies while considering the significant variations between transit agencies. The objective of Action 25 incorporates an emphasis on universal practices, reducing the burden to applicants, riders, and transit agencies, regionalizing some functions, and minimizing the level of new investment while also ensuring continued federal compliance. These have been the guiding principles in developing recommendations by MTC and the Bay Area Partnership Accessibility Committee (BAPAC), a working group of Bay Area transit and paratransit agency staff. Variations among transit agencies include but are not limited to size, jurisdictional density, priorities of riders and elected officials, and existing contracts with eligibility vendors.

Draft Report and Recommendations

In consultation with paratransit riders, MTC and transit agency staff have developed draft recommendations and are seeking your feedback and input. The draft report is divided into three sections: (1) An overview of current eligibility practices by public transit agencies in the Bay Area, (2), industrywide best practices and lessons learned from peer transit agencies across the country, and (3) near-term recommendations.

Complete standardization would require a large investment of new funding and would not necessarily be beneficial in all cases. Given the fiscal challenges currently faced by many transit agencies, this draft report identifies near-term actions that will result in a level of standardization to meet the Action 25 objectives. At the same time, far-reaching recommendations have also been presented as long-term items to consider as additional resources become available. A summary of the recommendations is listed below.

1. Standardize application forms and provide applications online, including translated versions, to meet Title VI requirements.
2. Standardize eligibility interview protocols for agencies using in-person and paper/phone-based assessments.
3. Standardize the appeals process.
4. Explore non-in-person assessments for disability categories that are not conducive to in-person assessments.

5. Increase the application of trip conditional eligibility.
6. Standardize definitions of eligibility categories and renewal timelines.
7. Set aside new funding for MTC to host paratransit eligibility training annually.
8. Identify and enhance the promotion of paratransit alternatives and incorporate travel training referrals during the eligibility process.
9. Develop ongoing monitoring strategies for quality assurance
10. Learn about new eligibility vendors in coordination and with support from MTC
11. Explore technical solutions to enhance eligibility implementation

Next Steps:

MTC staff is collecting and incorporating feedback from MTC's Policy Advisory Council Equity and Access Subcommittee and the region's nine paratransit coordinating councils throughout the region. A final draft report will be presented later this spring. Please send feedback to Drennen Shelton, dshelton@bayareametro.gov.

Attachments:

- Attachment A: Transformation Action Plan Accessibility Items
- Attachment B: Bay Area Paratransit Eligibility Transformation Action Plan Draft Report

Attachment A

Transformation Action Plan Accessibility Items

Action #	Action Description
Action 21	Designate a Mobility Manager to coordinate rides and function as a liaison between transit agencies in each county, consistent with the Coordinated Plan
Action 22	Fund additional subregional one-seat paratransit ride pilots and develop cost-sharing policies for cross jurisdictional paratransit trips
Action 23	Integration of ADA-paratransit services on Clipper Next Generation (this is an ongoing effort, led by Clipper staff)
Action 24	Identify key paratransit challenges and recommend reforms through the Coordinated Plan update
Action 25	Adopt standardized eligibility practices for programs that benefit people with disabilities (ADA-paratransit and RTC Program)

Bay Area Paratransit Eligibility Transformation Action Plan Action 25

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Action 25: Standardized Eligibility Practices

Action 25 Introduction

Action 25 of the Bay Area Transit Transformation Action Plan focus on standardizing eligibility practices for programs that benefit people with disabilities (Regional Transportation Connection Clipper® Access program and ADA paratransit) be established for the Bay Area.

Eligibility for both the RTC Clipper Access and ADA paratransit is based on qualifying disabilities, but the eligibility criteria for ADA paratransit is more rigorous than the RTC Clipper Access eligibility criteria. RTC Clipper Access provides a Clipper discount card to Bay Area residents with qualifying disabilities.[1] Eligible riders use the card to receive discounted fares on fixed-route bus, rail, and ferry systems throughout the Bay Area. To better align eligibility, MTC and Bay Area transit agencies expanded RTC Clipper Access eligibility to include riders who are ADA paratransit eligible. This has streamlined the RTC Clipper Access application process for ADA paratransit riders who can use fixed-route transit under some circumstances. This work was completed in September 2023.

Paratransit Eligibility Summary

The larger focus of Action 25 is on standardizing the approach to determining eligibility for ADA-mandated paratransit provided by Bay Area public transit agencies. The Americans with Disabilities Act (ADA) requires public transit agencies that provide fixed-route service to provide "complementary paratransit" service to people with disabilities who cannot use the fixed-route bus or rail service some or all of the time because of a disability. In general, ADA paratransit service must be provided within 3/4 of a mile of a bus route or rail station, at the same hours and days, for no more than twice the regular fixed-route fare. To qualify for this service, it is typically necessary to submit an application, and may also require supporting documentation, an in-person interview and/or an in-person assessment of the applicant's ability to use fixed-route service.

Since the initial implementation of ADA paratransit in the early 1990's, many different approaches have been used by Bay Area's transit agencies. All have been guided by the expertise and competence of resolute program staff and informed by sometimes shifting federal guidance and local priorities through the decades. As a result, Bay Area transit agencies employ a wide variety of evaluation practices for establishing ADA paratransit eligibility.

The work of Action 25 emphasizes universal practices, reducing burden to applicants, riders, and transit agencies, regionalizing some functions, and minimizing the level of new investment, while also ensuring continued compliance with federal requirements contained in 49 CFR Part 27, FTA Circular 4710.1 and elsewhere. These have been the guiding principles in the development of the recommendations by MTC and the Bay Area Partnership Accessibility Committee (BAPAC), a working group of Bay Area public transit and paratransit agency staff.

It important to note that there are significant variations between transit agencies in the nine-county Bay Area that limit the full standardization of eligibility practices. These variations include but are not limited to the size and governance structure of the agency, demographic differences between subregions, jurisdictional density, and associated availability of fixed-route/other transportation services, political

[1] https://511.org/transit/rtc-card

priorities of elected officials and constituencies in different jurisdictions, and existing contracts with eligibility vendors.

Further, full adoption of best practices identified elsewhere in the U.S. would require a large investment of already very limited resources and would not necessarily be beneficial in all cases. Based on preliminary cost analysis, the recommendations presented in this report could lead to some agencies incurring higher eligibility costs and others lower costs. Ideally, agencies would pool their resources to share the burden of the eligibility function for the sake of regional benefits of standardized practices. However, given the fiscal challenges currently faced by many transit agencies, these recommendations have identified near-term actions that will result in a level of standardization to meet the Action 25 objectives, while considering the context for implementation by each agency. At the same time, some of the more far-reaching recommendations have also been presented as long-term recommendations to consider over time and as additional resources become available.

This report is divided into three sections. The first provides an overview of current eligibility practices by public transit agencies in the Bay Area. This is followed by a section describing the industrywide best practices and lessons learned from peer transit agencies across the country. The third section presents near-term recommendations that are intended to be implemented by all agencies, and some strategies for longer-term consideration to meet the overall objectives of Action 25 consistent with best practices nationwide. A summary of the recommendation is listed below.

Near-Term Recommendations

1. Standardize application forms and provide applications online including translated versions to meet Title VI requirements
2. Standardize eligibility interview protocols for agencies using in-person and paper/phone-based assessments
3. Standardize the appeals process
4. Explore non in-person assessments for disability categories that are not conducive to in-person assessments
5. Increase the application of trip conditional eligibility
6. Standardize definitions of eligibility categories and renewal timelines
7. Standardize eligibility renewal timelines and increase the eligibility period for permanent eligibility and auto-renewals from three to five years
8. Set aside new funding for MTC to host paratransit eligibility trainings annually
9. Identify and enhance promotion of paratransit alternatives and incorporate travel training referrals during the eligibility process
10. Develop on-going monitoring strategies for quality assurance
11. Learn about new eligibility vendors in coordination and with support from MTC
12. Explore technical solutions to enhance eligibility implementation

Recommendations to Consider Longer-term

- Explore implementation of in-person assessments
- Consider an integrated regional system of eligibility centers

Bay Area ADA Paratransit Eligibility Practices

The Americans with Disabilities Act (ADA) requires public transit agencies that provide fixed-route service to provide "complementary paratransit" service to people with disabilities who cannot use the fixed-route bus or rail service some or all of the time because of a disability. In general, ADA paratransit service must be provided within 3/4 of a mile of a bus route or rail station, at the same hours and days, for no more than twice the regular fixed-route fare. To qualify for this service, it is typically necessary to submit an application, and may also require supporting documentation, an in-person interview and/or an in-person assessment of the applicant's ability to use fixed-route service.

Information was gathered about current eligibility practices conducted by public transit ADA-mandated paratransit programs throughout the region. Documentation of these practices is based on interviews with representatives of all ADA paratransit programs in the Bay Area, in addition to analysis of data generated by the Regional Eligibility Database (RED). Paratransit eligibility methods in the Bay Area range across a variety of models due to both differences in agency protocols and capacities, and the effect of the pandemic. It should be noted that the information contained in this report was gathered in August-October 2022, at a time when agencies were slowly beginning to emerge from the effects of the pandemic.

Due to COVID-related restrictions starting in March 2020, many Bay Area transit agencies significantly changed their processes for determining ADA paratransit eligibility. Agencies that had used in-person assessments shifted to paper-based or telephone interviews to avoid potential contagion. As a result, to identify "typical" eligibility models used by the various agencies, a segment of this analysis is based on 2019 practices. In addition, while attempting to make direct comparisons between various agencies based on the RED, it was discovered that some data could not be captured due to RED reporting limitations.

Application Volume

The following table shows the number of applications submitted at each transit agency and illustrates volume decline since COVID.

Table 1 New Applications per Agency

Agency	2019 Monthly Average	July 2022	Percent Change
County Connection	49	28	-43%
East Bay Paratransit	161	204	21%
Livermore Amador Valley Transit Authority (LAVTA)	18	15	-17%
Marin Transit / Golden Gate Transit (Marin Access)	45	17	-62%
Napa Valley Transportation Authority (NVTA)	13	9	-31%
Petaluma Transit	12	13	10%
SamTrans	113	93	-18%
San Francisco Municipal Transportation Agency (SFMTA)	212	199	-6%
Santa Clara Valley Transportation Authority (VTA)	250	190	-24%
Santa Rosa CityBus	24	17	-29%

Solano County Operators[2]	46	26	-44%
Sonoma County Transit	23	15	-35%
Tri Delta Transit	56	75	34%
Union City Transit	11	12	9%
WestCAT	5	2	-60%

Eligibility Models

Within the U.S., the Bay Area is unique in the variety of paratransit eligibility models adopted by the transit agencies in the region. As a result, an applicant in one area of the region cannot be guaranteed the same eligibility process and potentially the same outcome if they were to apply in another part of the region. This task is intended to address this issue of regional inconsistency.

At the same time there are myriad historic reasons and present-day realities that influence the adoption of various eligibility models. For example, large paratransit programs have greater financial resources than small programs to implement what are considered in the industry to be more sophisticated eligibility processes i.e., eligibility models that incorporate some form of in-person assessments. But a few small Bay Area agencies report not experiencing fiscal constraints within their paratransit programs and recorded paratransit ridership declines even before the onset of COVID. These agencies may not see a need to implement an in-person model that could present a barrier to expanding paratransit ridership base, and consequently, depriving the programs of funds that could be used for service provision.

Political realities are often the determinant of the eligibility model adopted by an agency, while others are more focused on cost controls. Some decision-makers perceive in-person assessments to be a "stricter" and therefore represent a constraint on the civil rights of people with disabilities. Others perceive in-person assessments as necessary to preserving quality paratransit service for people with disabilities who do not have other transportation options. Further, in-person eligibility models are more costly than other models. Indeed, experience within the Bay Area and beyond has shown that the quality of both phone-based and in-person assessments can vary substantially based on the evaluator's training/background, methodology, questions, etc. This is discussed in greater detail in subsequent sections.

The divergence of fiscal and political realities is illustrated in the broad range of eligibility models within the Bay Area. Some agencies rely only on a paper-based application to determine eligibility, which applicants either mail in or drop off at the transit agency. Other agencies conduct phone or in-person interviews in addition to applications. Still others follow-up phone or in-person interviews with a transit skills assessment (also known as a "functional assessment") that evaluates an applicant's ability to use the fixed-route system.

Pre-COVID, a substantial proportion of agencies used in-person assessments, both "interviews only" or "interviews plus functional assessments as needed." A slightly smaller proportion used paper-based assessments with the option of follow-up interviews.

[2] Eligibility for the five Solano County transit agencies (City of Dixon, Fairfield and Suisun Transit, Rio Vista Delta Breeze, Solano County Transit, and Vacaville City Coach) is performed through one contract overseen by Solano Transportation Authority (STA), the consolidated transportation service agency and county transportation authority, and in this report will be referred to as the Solano County Operators.

Agencies such as SamTrans, County Connection, SFMTA, East Bay Paratransit, Santa Rosa CityBus, Petaluma Transit, and the Solano County Operators required in-person assessments pre-COVID, but all relied on phone interviews during the pandemic. Most of these agencies gradually reinstituted in-person assessments during 2022.

Marin Access (representing Golden Gate Transit and Marin Transit) noted political support for a relatively open eligibility process due to the lack of funding constraints within their paratransit program. Both Marin Access and Union City Transit have never conducted in-person evaluations and believe that the benefits do not justify the cost. However, Marin Access indicated that more than half the applications require phone interview follow-ups to clarify information submitted by the applicant. VTA's board of directors does not support in-person evaluations, even though the contractor for the agency is almost fully set up to conduct these assessments. Napa Valley Transportation Authority (NVTA) is open to in-person evaluations if the process costs would be mitigated by a regional eligibility model. Tri Delta Transit at the time of the interviews was conducting in-person interviews on a very limited basis. WestCAT automatically confirms all applicants as eligible if they submit all the required information.

Eligibility Levels

Paratransit applicants are granted different eligibility determinations based on the extent to which the applicants' disability impacts their ability to ride the fixed-route system. The following table provides definitions for each of the four potential eligibility determinations.

Table 2 Eligibility Level Definitions

Eligibility Level	Definition
Unconditional[3]	The rider's disability prevents them from using the fixed-route service under any circumstances, regardless of weather, distance to the stop, etc.
Conditional	The rider can be reasonably expected to make some trips on the fixed-route service, whereas paratransit will be required for other trips.
Denied	Applicant is ineligible to use ADA paratransit service as they are able to use fixed-route service independently. Applicant can reapply at any time.
Incomplete	Application reviewed by the agency and found to be incomplete, returned to the applicant for completion.

Use of Eligibility Conditions

One of the key measures of an effective eligibility program is the ability to make conditional eligibility determinations and to have the reservationist staff capability to apply those conditions to trip requests. While there are model agencies throughout the U.S. that routinely apply conditions, most systems nationwide have not implemented this eligibility category because of the perception that implementation is expensive and complicated.

While almost all Bay Area agencies use the conditional eligibility category, only three reported application of eligibility conditions: SamTrans, Sonoma County Transit and Petaluma Transit. However, Petaluma Transit indicated that since they have transitioned from in-person contracted evaluations to

[3] Also known as "full" eligibility.

an in-house, paper application-based model, the percentage of eligibility conditions has declined. VTA and County Connection have chosen not to apply eligibility conditions due to lack of training of scheduling staff, which is a significant issue for many agencies due to salary and skill levels of most reservationists. Marin Access has not ruled out the possibility of applying eligibility conditions but noted the high training costs needed to implement this change.

Eligibility Term

The RED currently defines ADA paratransit eligibility terms as follows:

Table 3 RED Eligibility Term Definitions

RED Eligibility Term	Definition
Permanent	Three years[4] of eligibility followed by full recertification process
Temporary	Up to one year of eligibility followed by full recertification process
Auto-renewal	Three years of eligibility followed by abbreviated recertification process (also known as auto-recertification, simplified, or expedited recertification), typically used for riders with permanent disabilities

Recertification and Permanent Eligibility

Importantly, the "permanent" status does not actually grant riders with permanent eligibility. Rather, the permanent status grants riders with an extended term of eligibility (in this case, three years) before having to go through the full recertification process. By contrast, the "auto-renewal" status is an approach that has been identified as an important benefit to some members of the disability community, particularly those who have permanent disabilities.

Under the auto-renewal process, agencies use information gathered about the rider's disability during the initial application process or subsequent recertification where evaluators indicate that the applicant's inability to ride fixed-route transit is unlikely to change. They would therefore not be required to participate in a full recertification process when their eligibility expires. For both riders and agency staff this reduces the burden associated with a full follow-up application recertification process.

Agencies have different ways of handling this auto-renewal process, but generally a short form or postcard is sent to riders asking for an update of contact information, changes in mobility, changes in disability, and any changes in mobility devices used.

Table 4 Agencies that Grant Auto-Renewal Eligibility During Initial Assessment

Agency	Grant Auto-Renewal Eligibility During Initial Assessment
County Connection	Yes
East Bay Paratransit	Yes
Livermore Amador Valley Transit Authority (LAVTA)	Yes
Marin Transit / Golden Gate Transit (Marin Access)	Yes
Napa Valley Transportation Authority (NVTA)	No

[4] The RED default for Permanent eligibility was updated from three to five years on February 1, 2024.

Petaluma Transit	Yes
SamTrans	Yes
San Francisco Municipal Transportation Agency (SFMTA)	No
Santa Clara Valley Transportation Authority (VTA)	No
Santa Rosa CityBus	Yes
Solano County Operators	No
Sonoma County Transit	Yes
Tri Delta Transit	Yes
Union City Transit	Yes
WestCAT	Yes

Nine agencies allow for an auto-renewal eligibility designation during their initial assessment. East Bay Paratransit, NVTA, and the Solano County Operators provide auto-renewal eligibility by an abbreviated short form for the eligibility recertification process. Marin Access relies on a professional verification form[5], to determine auto-renewal eligibility. SFMTA grants permanent eligibility to all customers who use group van agency services.[6] County Connection does not provide auto-renewal eligibility during the initial assessment but plans to initiate this approach shortly. SamTrans offered "renew by mail" eligibility during the initial assessment pre-pandemic.

Table 5 Permanent Eligibility Rate

Agency	Permanent Eligibility Rate
County Connection	97%
East Bay Paratransit	80%
Livermore Amador Valley Transit Authority (LAVTA)	5%
Marin Transit / Golden Gate Transit (Marin Access)	90%
Napa Valley Transportation Authority (NVTA)	46%
Petaluma Transit	40%
SamTrans	20%
San Francisco Municipal Transportation Agency (SFMTA)	5%
Santa Clara Valley Transportation Authority (VTA)	0%
Santa Rosa CityBus	38%
Solano County Operators	22%
Sonoma County Transit	0%
Tri Delta Transit	95%
Union City Transit	Unable to provide
WestCAT	100%

[5] A professional verification of functional disability requires the applicant's treating professional to fill out information on the applicant's disability, date of onset, medications used, side effects, etc.

[6] SF Paratransit Group Van offers pre-scheduled, door-to-door van service to groups of ADA-eligible riders attending specific agency programs such as Adult Day Health Care, senior centers, or workplaces.

In-House Staff vs. Contractor Evaluations

Seven agencies conduct eligibility evaluations using in-house staff. Of these agencies, Petaluma Transit and Union City Transit reported that their staff are required to enroll in National Transit Institute (NTI) ADA paratransit eligibility training. The NTI training is also used by other agencies but not as a staff requirement. It should be noted that during the past three years NTI class offerings have been significantly scaled back. LAVTA previously externally contracted eligibility evaluations pre-pandemic but now conducts evaluations in-house. WestCAT and Sonoma County Transit indicated that their in-house evaluators had no formal training apart from on-the-job training.

Eight agencies use contractors to determine eligibility. East Bay Paratransit requires contracted certification analysts to attend NTI training. The five national eligibility vendors who have active contracts in the Bay Area are CARE Evaluators, Medical Transportation Management (MTM), Transdev, ADA Ride, and Paratransit, Inc.

Table 6 Conducting Evaluations: In-House vs. Contractor

Agency	In-House vs. Contractor Evaluations
County Connection	In-house
East Bay Paratransit	Contractor (Transdev)
Livermore Amador Valley Transit Authority (LAVTA)	In-house
Marin Transit / Golden Gate Transit (Marin Access)	Contractor (Transdev)
Napa Valley Transportation Authority (NVTA)	Contractor (ADA Ride)
Petaluma Transit	In-house
SamTrans	Contractor (MTM)
San Francisco Municipal Transportation Agency (SFMTA)	Contractor (Transdev)
Santa Clara Valley Transportation Authority (VTA)	Contractor (Transdev)
Santa Rosa CityBus	Contractor (CARE)
Solano County Operators	Contractor (Paratransit, Inc.)
Sonoma County Transit	In-house
Tri Delta Transit	In-house
Union City Transit	In-house
WestCAT	Contractor (MV Transportation)

Training for Personnel Conducting Evaluations

The skill levels and training of eligibility evaluators significantly impacts their ability to reliably conduct accurate eligibility determinations. The Easter Seals Project ACTION manual and training program that has served as the gold standard for eligibility models in the U.S. for the past twenty years recommends that occupational and physical therapists (OTs and PTs) generally have the best skills for determining applicants' ability to ride fixed-route transit. However, in practice, the personal familiarity of many OTs and PTs with the public transit options in their area cannot necessarily be assumed, as they are no more likely to be regular transit riders than are professionals in similarly prestigious positions. Additionally, due to the costs associated with hiring and retaining these professionals, and periods in which there are a lack of available candidates for evaluation, OTs and PTs are generally used to conduct evaluations only in larger and medium sized U.S. transit agencies. Many smaller agencies rely on training that has been provided periodically by programs like NTI, and staff without postsecondary educational backgrounds.

Bay Area transit agencies reported extremely limited use of OTs and PTs in their eligibility programs (only one agency), including those conducted by contractors. Some agencies indicated that their evaluators had participated in the NTI trainings and others that their evaluators had only received on-the-job training, usually from their predecessors. In some instances, eligibility determinations are conducted by clerical staff who have no training in disability or rehabilitation related fields. This common issue demonstrates that eligibility training is hard to find.

Integration of the Eligibility Process into Mobility Management Function

Mobility management is a strategic, cost-effective approach to encourage the development of services and best practices in the coordination of transportation services connecting people needing transportation to available transportation resources within a community. Its focus is the person — the individual with specific needs — rather than a particular transportation mode. Through partnerships with many transportation service providers, mobility management enables individuals to use a travel method that meets their specific needs, is appropriate for their situation and trip, and is cost-efficient.

In recent years, many U.S. transit agencies have shifted towards a more holistic approach to serving the mobility needs of the public. As part of this trend, the concept of mobility management has evolved which encourages and supports the consumer to make use of all public transportation resources in their community, not just ADA paratransit service. This holistic approach is also recommended in MTC's Coordinated Public Transit-Human Service Transportation Plan.[7] The additional transportation resources, including travel training, community shuttles, taxis, and ride hailing companies could potentially meet some of the mobility needs of people with disabilities. Some agencies have integrated the paratransit eligibility function into their mobility management structure to broaden mode choices for individuals seeking paratransit eligibility.

Seven Bay Area agencies reported having no plans to integrate the eligibility function into a broader mobility management framework, but many others have either explicitly folded eligibility into mobility management, or ensure that, as part of their eligibility process, customers are made aware of the other mobility services available in their area.

SFMTA, County Connection, Marin Access, LAVTA have all integrated the eligibility function into a larger mobility management structure to varying degrees. East Bay Paratransit provides a resource list to applicants during their evaluation process and are considering developing an in-house travel training program. While VTA is still in the early stages of creating a mobility management function, they do refer customers to volunteer driver programs. Other agencies reported that they refer to other program offerings as part of their eligibility process e.g., Napa Valley Transportation Authority (NVTA) staff inform applicants about their shared vehicle program. SamTrans has a mobility management function that is not linked directly to the eligibility process, but evaluators do offer travel training referrals. Tri Delta Transit does not currently plan to integrate the eligibility function into a mobility management function but may change direction under new management and to further the countywide mobility management plan.

[7] www.mtc.ca.gov/coordinatedplan

Table 7 Mobility Management Functions Integrated into Eligibility Process

Agency	Mobility Management Functions Integrated into Eligibility Process
County Connection	Already integrates the eligibility process into a mobility management function
East Bay Paratransit	Provides information and some referrals to other mobility options; Does not work directly with other agencies
Livermore Amador Valley Transit Authority (LAVTA)	Already integrates the eligibility process into a mobility management function
Marin Transit / Golden Gate Transit (Marin Access)	Already integrates the eligibility process into a mobility management function
Napa Valley Transportation Authority (NVTA)	Promotes reduced taxi fare and transit ambassador programs as part of eligibility process
Petaluma Transit	Open to having a mobility manager assist with assessments, travel training, and outreach
SamTrans	Offers transit training referrals; Has mobility management function that is not directly related to eligibility process
San Francisco Municipal Transportation Agency (SFMTA)	Already integrates the eligibility process into a mobility management function
Santa Clara Valley Transportation Authority (VTA)	Refers riders to volunteer programs, promotes Regional Transportation Connection Clipper Access program
Santa Rosa CityBus	No plans to integrate eligibility process into a mobility management function
Solano County Operators	No plans to integrate eligibility process into a mobility management function
Sonoma County Transit	No plans to integrate eligibility process into a mobility management function
Tri Delta Transit	May integrate eligibility process into mobility management function with new management
Union City Transit	No plans to integrate eligibility process into a mobility management function
WestCAT	No plans to integrate eligibility process into a mobility management function

Eligibility Costs

The information in the tables below provides the costs of the eligibility process within each transit agency and the costs per individual assessment. The cost per individual assessment is calculated by dividing the overall eligibility process cost by the number of completed assessments. Eligibility costs can be calculated differently by different agencies, but generally they include staff time needed for administrative tasks (including contract oversight where this is relevant), reviewing applications, conducting interviews and transit skills assessments, professional follow-ups, and write-up of reports and correspondence. They generally do not include the capital costs of the assessment facility or development of marketing materials, although these are sometimes included in the eligibility vendor's scope where this function is contracted out.

In reviewing and comparing the costs documented below, transportation costs to and from assessment facilities is one substantive cost that has not been included for those conducting in-person assessments. This is due to the inconsistency with which transportation costs are reflected in the costs provided by transit agencies. This omission of costs should facilitate an apples-to-apples comparison but is nevertheless a factor that should be considered by all agencies considering in-person assessments. Decision-makers may view these per assessment costs as high, therefore education regarding the long-term cost and civil rights benefits of more accurate assessments is important.

Table 8 Annual Assessment Costs Per Applicant and Eligibility Process Costs

Agency	Number of Annual Assessments	Cost per Assessment	Total Annual Cost of Eligibility Process
County Connection	1,198	$192	$230,000
East Bay Paratransit	5,914	$70	$414,000
Livermore Amador Valley Transit Authority (LAVTA)	300	$67	$19,500
Marin Transit / Golden Gate Transit (Marin Access)	N/A	Unable to provide	$75,000
Napa Valley Transportation Authority (NVTA)	N/A	$240	Unable to provide
Petaluma Transit	350	$200	$70,000
SamTrans	2,368	$231	$547,000
San Francisco Municipal Transportation Agency (SFMTA)	5,827	$162	$944,000
Santa Clara Valley Transportation Authority (VTA)	4,872	$195	$950,000
Santa Rosa CityBus	228	$334	$76,000
Solano County Operators	1,768	$164	$290,000
Sonoma County Transit	200	$150	$30,000
Tri Delta Transit	1,440	$86	$125,000
Union City Transit	Unable to provide	Unable to provide	Unable to provide
WestCAT	175	$163	$28,525

Costs per individual assessment ranged from $70 for East Bay Paratransit to $344 for Santa Rosa CityBus. Per assessment costs at Santa Rosa CityBus and other contracting agencies have grown considerably since the onset of the pandemic due to high fixed costs being spread across a reduced volume of applications. VTA's eligibility contract is largely set up to cover the cost of staff that would be required to conduct in-person interviews. However, as of September 2023, the current model relies exclusively on phone interviews. As a result, the cost per phone assessment is almost as high as would be the case if the agency was conducting in-person interviews since these are largely driven by labor costs.

It should be noted that some of these costs were much higher pre-COVID when contractors were providing in-person assessments rather than phone interviews e.g., Solano County Operators paid their contractor $397.65 for in-person assessments, in contrast to $164 for phone interviews.

Table 8 provides the range of costs for eligibility processes within each agency, both contracted costs and in-house costs, based on information provided in the stakeholder interviews. The total annual cost

of eligibility processes ranged from $30,000 in Sonoma County to nearly $950,000 at VTA. As noted above, these do not include the considerable costs of providing transportation to and from in-person assessments.

Appeals Models

Transit agencies are required by the ADA to create an appeals procedure that allows applicants who have been granted any determination other than "unconditional" to have their eligibility determination subject to additional review.

Table 9 Appeals Models by Agency

Agency	Appeals Model
County Connection	Agency Committee
East Bay Paratransit	Agency Committee
Livermore Amador Valley Transit Authority (LAVTA)	Referral to Executive Director
Marin Transit / Golden Gate Transit (Marin Access)	Agency Committee
Napa Valley Transportation Authority (NVTA)	Referral to Executive Director
Petaluma Transit	Agency Committee
SamTrans	Agency Committee
San Francisco Municipal Transportation Agency (SFMTA)	Agency Committee
Santa Clara Valley Transportation Authority (VTA)	Agency Committee
Santa Rosa CityBus	None
Solano County Operators	Agency Committee
Sonoma County Transit	Agency Committee
TriDelta Transit	Agency Committee
Union City Transit	None
WestCAT	Agency Committee

The appeals process of ten agencies is the responsibility of an agency-based committee made up of medical professionals, transit agency representatives, and paratransit registrants. Many agencies conduct an administrative review of the appeal before referring to an appeals panel. For example, VTA uses a two-level appeals process that includes an administrative level of appeal conducted in-house, then an appeals committee made up of VTA managers. Instead of consulting a committee, NVTA evaluation staff refer appeals to the Executive Director.

Four agencies do not have a documented appeals process. LAVTA has historically overturned conditional eligibility determinations in favor of the applicant upon appeal. Several agencies have had few appeals processes in recent years. Marin Access and Petaluma Transit reported not having received an appeal since 2018.

Other Suggestions and Observations by Transit Agency Staff

As part of the interview process with agency staff throughout the Bay Area, some offered some additional suggestions for consideration in the development of eligibility process recommendations, as follows:

- For any recommended eligibility model changes, it is important to consider the implementation timeline as it relates to current eligibility contracts, as it can take up to 12 months to complete a contract process.
- The cost of the eligibility function (in funding, staff resources, etc.) impacts processes and outcomes. While transit agencies may be big, accessible services departments tend to be small, and some can afford robust contractor support while others cannot.
- ADA paratransit programs typically consume an outsized proportion of transit agency's operating budget while only accounting for a small percent of the agency's ridership. Therefore, the pressure to keep paratransit program costs as low as possible across the board is immense. However, the development of a sophisticated eligibility process within a high quality mobility management framework requires bold action and investment. The importance of decision-maker and executive management level support cannot be overstated.

Lessons Learned from Elsewhere in the U.S.

Over the course of more than thirty years since the passage of the Americans with Disabilities Act (ADA), numerous studies and reports have documented best practices in the field of paratransit eligibility certification programs, although at this point most are at least a decade old. The first document, which remains the gold standard for best practices in the field, is the Paratransit Eligibility Manual published by Easter Seals Project ACTION (ESPA). Although it was published in 2003 (and updated in 2014 by the National Aging and Disability Transportation Center https://www.nadtc.org/wp-content/uploads/NADTC-Determining-ADA-Paratransit-Eligibility.pdf), this manual has been used and is still used by a significant portion of paratransit evaluators around the country since the time of publication.

In addition to chapter 9 of the Federal Transit Administration's Circular 4710.1, Guidance on the ADA[8], several substantial and well-researched reports documenting best practices and guidance for determining ADA paratransit have been published. It should be noted that these resources were developed as best practices in some cases, almost 15 years ago. The fact that there are not newer resources available indicate that ADA paratransit has not changed or progressed since its inception. Still, these resources should be considered as Bay Area agencies consider changing eligibility practices.

- Topic Guides on ADA Transportation, Topic Guide 3: ADA Paratransit Eligibility; DREDF, TranSystems and the Federal Transit Administration, 2010
- TCRP Synthesis 116: Practices for Establishing ADA Paratransit Eligibility Assessment Facilities, TRB, 2015
- TCRP #163: Strategy Guide to Enable and Promote the Use of Fixed-route Transit by People with Disabilities, TRB, 2013

It should be noted that the extracts highlighted below range from information that will be basic to many in the industry, to more nuanced recommendations of eligibility best practices, in recognition of the range of familiarity of readers of this report.

The highlights of best practices documented below are followed by summaries of interviews with four well-known ADA paratransit eligibility programs outside of the Bay Area. These include:

[8] U.S. Department of Transportation. Federal Transit Administration. FTA C 4710.1 (November 4, 2015).

- San Diego MST
- Capital Metro (Austin, TX)
- Chicago RTA
- King County Metro (Seattle, WA)

King County is the only ADA paratransit program included here that serves rural communities in addition to urban and suburban areas.

Topic Guides on ADA Transportation, Topic Guide 3: ADA Paratransit Eligibility (2010)

Strictly limit eligibility using best practices in the transit industry:

- This is intended to prevent transit agencies from conferring ADA paratransit rights on large sections of the general public who do not require paratransit service, due to the cost implications and the inevitable decline in the quality of service if non-eligible riders used the service.
- A program that strictly limits eligibility without utilizing best industry practices risks denying access to people who have a civil right to ADA paratransit service.

Base eligibility decisions on the applicant's most limiting condition

- The transit agency should consider the applicant's potential travel throughout the entire region, not only near the home or workplace, and during all seasons.
- Secondary conditions such as disorientation, fatigue, and difficulties with balance should be considered, as well as variable conditions such as multiple sclerosis, which may change the applicant's ability to travel at different times.
- Staff proficient in assessing functional ability to use the fixed-route service and evaluating barriers to travel should conduct eligibility and route assessments.

Develop and use a comprehensive skills list:

- To correctly assess eligibility, a transit agency must consider:
    - The individual's functional ability
    - The accessibility of the transit system, and its stations and stops
    - The impact of architectural barriers including streets and intersections, lack of sidewalks and poor sidewalks, lack of curb ramps and poor curb ramps
    - Specific local environmental conditions, such as the climate

TCRP Synthesis 116: Practices for Establishing ADA Paratransit (2015)

Eligibility Assessment Facilities

This report examines the state of the practice in implementing and conducting determinations of ADA paratransit eligibility. It looks at the various processes, facilities, equipment, and tools used by transit agencies that include in-person interviews and functional assessments.

The following table presents a portion of the agencies that were included in the study. As is evident by the population size of the service areas, most of the agencies using eligibility assessment facilities for in-person assessments serve medium to large systems (only three are in locations with populations under 400,000). However, in the eight years since the survey was conducted, increasing numbers of small to medium size cities have introduced in-person eligibility assessments.

Table 10 Eligibility Outcomes for Agencies with Eligibility Assessment Facilities

Transit Agency, City, State	Area Population (2012)	Applications per Year
Anchorage Public Transportation Department, Anchorage, AK (Muni)	245,069	797
Corpus Christi Regional Transit Authority, Corpus Christi, TX (CCRTA)	342,412	927
Spokane Transit Authority, Spokane, WA (STA)	394,120	1,818
Pierce County Public Transportation Benefit Area, Tacoma, WA (Pierce)	557,069	3,233
San Mateo County Transit District, San Carlos, CA (SamTrans)	737,100	2,888
Jacksonville Transportation Authority, Jacksonville, FL (OTA)	838,815	1,209
Department of Transportation Services, Honolulu, HI (DTS)	953,207	4,629
Capital Metropolitan Transit Authority, Austin, TX (CMTA)	1,023,135	3,029
Central Ohio Transit Authority, Columbus. OH (COTA)	1,081,405	2,056
Port Authority of Allegheny County, Pittsburgh, PA (ACCESS)	1,415,244	725
Tri-County Metropolitan Transportation District, Portland, OR (TriMet)	1,469,790	3,338
Nashville Metropolitan Transit Authority, Nashville, TN	1,583,115	1,132
Broward County Transit, Ft. Lauderdale, FL	1,780,172	5,358
Regional Transportation Commission of S. Nevada, Las Vegas, NV	1,886,011	5,560
King County Metro, Seattle, WA	1,957,000	6,122
Utah Transit Authority, Salt Lake City, UT	2,165,290	1,161
Metro Mobility, Minneapolis, MN	2,314,701	8,612
Dallas Area Rapid Transit, Dallas, TX	2,423,480	3,732
Orange County, Transportation Authority, Orange, CA	3,014,923	7,871
Southeastern Pennsylvania Transportation Authority, Philadelphia, PA	3,320,234	6,295

Valley Metro, Phoenix, AZ	3,629,114	4,753
Massachusetts Bay Transportation Authority, Boston, MA	4,181,019	11,114
Regional Transportation Authority, Chicago, IL	6,133,037	15,960
Access Services, Inc., Los Angeles, CA	11,638,106	39,483

Fourteen of the 24 transit agencies own or lease the facilities used for making eligibility determinations. Contractors provide the facilities at the other 10 agencies. The size of the facilities ranges from 702 square feet to 19,500 square feet. The average size is 7,884 square feet for processes that relied more heavily on indoor simulations and props. Where assessments are done mainly outdoors, facilities average 2,538 square feet. Others use elaborate indoor facilities, which are designed to simulate travel in the community. Ramps of various slopes are used to simulate hills, and mock-ups of street crossings and traffic controls are often included. Full-sized, fixed-route buses with lifts or ramps or mock-ups of buses are also often included within the facility. Curbs, curb ramps, and rough or unstable surfaces (e.g., simulated broken/uneven pavement; artificial grass; gravel, loose dirt, sand) along the indoor walk.

- Easter Seals Project ACTION (ESPA) guidance is also widely used to design outdoor assessment routes. Such routes are typically up to 0.5 mile (2,640 ft) in length; include pathways with curbs, curb ramps, varied surfaces, slopes, and cross-slopes; and uncontrolled as well as controlled intersections.
- Besides the specific design of indoor and outdoor routes and props used for functional assessments, the case examples also identified important facility design considerations, Including
    - Adequately sized waiting areas for applicants, as well as other individuals attending the interviews and assessments.
    - Adequately sized pickup and drop-off areas for applicants arriving by paratransit.
    - The maintenance of privacy in areas where interviews and assessments are conducted.
    - Multiple elevators if facilities are in shared buildings.
- The case examples revealed that public involvement is important if eligibility determination processes are changed to include in-person interviews and functional assessments. Public input is also important in facility design.
- Several agencies noted that well-designed and equipped facilities helped them build public confidence in the overall eligibility determination process.
- Most agencies used a single eligibility determination facility. Two agencies—RTA and SEPTA—indicated multiple facilities; SEPTA has three facilities that serve its four-county service area, RTA has five facilities that serve a large six county area (administrative offices are located at one facility and other facilities are used just for interviews and assessments).

The following table illustrates the components of each step of the eligibility process used in the survey sample, pre-COVID, and may be indicators of the eligibility models paratransit systems may resume post-COVID.

Table 11 Types of Information and Processes Used to Make ADA Paratransit Eligibility Determinations, 2012 Survey of Transit Agencies

Sources of Information	Total	% of Total Respondents
Paper applications completed by applicants or others on their behalf	115	91%

Information from professionals familiar with applicants	95	75%
In-person interviews of all applicants	37	29%
In-person interviews of some applicants	28	22%
In-person functional assessments of all applicants	18	14%
In-person functional assessments of some applicants	33	26%
Other	13	10%
Total Respondents	127	

The following table describes eligibility outcomes using different models. The report states: "The literature suggests that processes that use in-person interviews and functional assessments have more thorough and accurate eligibility determination outcomes than processes that rely solely on paper applications and/or information from professionals familiar with applicants."

Table 12 Reported ADA Paratransit Eligibility Determination Outcomes for paper vs. In-Person Determination Processes

Type of Process	Unconditional Determination	Conditional Determination	Temporary Determination	Not Eligible Determination
Paper Applications with Professional Verification	88%	11%	1%	7%
In-Person Interviews and Functional Assessments	63%	28%	9%	7%

Finally, the report also suggests that with more thorough determinations, particularly better identification of specific and measurable conditions of eligibility, it is possible to implement trip-by-trip eligibility (determining if certain trips requested by conditionally eligible riders can be made by fixed-route transit)

- A review of trip-by-trip eligibility determinations by KC Metro in Seattle (Washington) found that about 7.5% of trips by conditionally eligible riders are made on fixed-route transit rather than ADA paratransit.
- A review of trip eligibility by ACCESS in Pittsburgh (Pennsylvania) found that 15% of trips by conditionally eligible riders are made on fixed-route transit rather than on ADA paratransit.

Lessons learned from case studies

- Transit agency staff noted that the agencies were generally pleased with the change they had made from a paper application process to in-person interviews and functional assessments.
- Staff also indicated that riders and their communities were largely accepting of the new process and facilities.
- Several noted that thorough public involvement was critical for gaining public acceptance of the new process.
- Several transit agencies noted that well-designed assessment facilities helped with public acceptance and confidence in the process.
- It was also noted that including an in-person element to the process helps with educating the public about the nature of ADA paratransit services. During interviews, eligibility staff can discuss service policies and answer any questions that applicants may have.
- Transit agencies reported the following logistical and design issues:

    - Having adequate waiting room space
    - Having adequate space for vehicles to drop off and pick up applicants
    - Having multiple elevators if the assessment center is in a shared office building
    - Ensuring and independently verifying the accessibility of any buildings that house the eligibility program
    - Verifying the accessibility of restrooms
    - Locating restrooms close to the interview and assessment areas
    - Maintaining confidentiality by separating administrative offices, interview rooms, and waiting areas from areas where functional assessments are conducted
    - Having separate waiting areas, if possible, for arriving applicants and applicants who have completed the process and are waiting for return rides
    - Allowing some down time for the unexpected—longer than expected interviews, additional assessments not initially expected issues with transportation, and other incidents
    - Cross training staff to help with workflow and to better manage a dynamic process
- The thoroughness of outcomes is generally considered to be related to the percentage of applicants found conditionally eligible.
- The thoroughness of determination outcomes likely depends most on the skills of the staff conducting assessments.

TCRP #163: Strategy Guide to Enable and Promote the Use of Fixed-route Transit by People with Disabilities (2013)

The research indicates that doing thorough ADA paratransit eligibility can assist riders with disabilities in identifying travel options beyond ADA paratransit. Implementing a more thorough eligibility determination process and trip-by-trip eligibility determinations can, however, be costly and require considerable work. Extensive community input is needed when changing the eligibility determination process. Creating transportation assessment centers and including in-person interviews and functional assessments as part of the process can also be costly and require a significant initial investment.

- On-street reviews of pathway accessibility must be conducted.
- Software must be customized or created to store trip eligibility decisions so that ADA paratransit reservationists and schedulers have the information they need to quickly determine if trips that are requested should be scheduled.
- Procedures need to be developed and implemented to allow reservationists and schedulers to easily make decisions related to factors that vary from day to day (such as the weather or time of day) and cannot be pre-determined.

If done correctly and with public input, more thorough eligibility determinations and trip-by-trip eligibility can have significant benefits that outweigh these initial and ongoing costs. Transit agencies that have successfully implemented more thorough ADA paratransit eligibility determination processes noted several important implementation issues:

- Developing a range of accessible transportation services and options for riders with disabilities.
- Holding extensive discussions with the community to obtain support prior to implementation.

- Stressing that the application process is not just about eligibility for the ADA paratransit service but is also to identify all the accessible transportation options that can assist individuals with meeting their travel needs.
- Taking every opportunity throughout the process to inform individuals about all accessible transportation services, including sending this information with application materials, telephone follow up when applications are received, and discussing transportation options during in-person interviews.
- Including in-person interviews and functional assessments in the process so that conditions of eligibility can be accurately and thoroughly determined.
- Setting measurable and specific conditions of eligibility so that they can be applied to trip requests.
- Not relying on determination letters to communicate conditions of eligibility but following up by phone with individuals determined conditionally eligible to explain their conditions and to answer any questions they may have.
- Conducting detailed on-street assessments to identify path-of-travel barriers when making trip eligibility decisions.
- Developing and using technology to record pathway and trip eligibility information.
- Customizing existing software or developing supplemental software that can record the results of trip eligibility reviews and automatically apply the results to rider requests so that decisions about trip accessibility do not have to be made by reservationists
- Developing a database of community accessibility as on-street pathway and trip eligibility reviews are completed and using this to make other trip eligibility decisions more easily in similar areas.
- Contacting people in-person to say if a trip is possible on fixed-route transit rather than having them find out when the trip is not accepted by a reservationist.
- Offering to accompany riders on initial fixed-route trips to facilitate a transition from ADA paratransit-to-fixed-route transit.
- Having a travel training program that can assist riders with the transition to fixed-route service.
- Adopting a "convenience fare" that allows riders to still use paratransit at a higher, non-ADA fare when trips are determined able to be made by fixed-route transit.

Model ADA Paratransit Eligibility Programs Outside of the Bay Area

To supplement the information provided elsewhere in this document regarding best practices, four paratransit eligibility program managers that are known nationwide for their effective eligibility models and innovative practices were interviewed. Following is a description of each program, including lessons learned that could be relevant to the Bay Area.

Chicago RTA

Known for integration of eligibility process and robust travel training program, interview with Michael VanDekreke, Director of Mobility Services Department (which includes both eligibility and travel training).

Eligibility

Prior to the pandemic, RTA conducted in-person assessments for all applicants, including those who were recertifying. Applicants were not required to submit the application form in advance but brought the completed forms to their interviews.

During the pandemic, RTA used a paper application, and if something was unclear on the form, staff would conduct a phone interview.

For recertifications, staff would only call if they identified changes since the previous assessment or if there was conflicting information reported in the application. The agency found that for the most part nothing had changed in terms of disability and mobility aid used, so used this as an opportunity to revise their approach to recertifications in the form of two pilot programs.

Pilot program I – this program was wrapping up at the time of the interview and was considered successful. Under this program, in-person assessments are only conducted for new applicants and "re-applicants" (i.e., those who have been eligible in the past but failed to renew their eligibility). Recertifying applicants are required to complete a full application and mail it into the RTA. If there have been any changes since the previous application, applicants are required to come in for an assessment, but this occurs on a limited basis. Based on the agency's experience during COVID, they believe that they have not compromised the accuracy of assessments and have seen significant expense savings.

Pilot program II – this program was planned for implementation in January 2023. When new or reapplicants call to apply, they will be scheduled to come in for an in-person interview and assessment. For recertifying applicants, staff will conduct a 30-minute customized phone interview based on the previous assessment's findings. If there have been significant changes, applicants will be required to come in for an assessment. One of the goals of this pilot is for the program to become paperless, so the paper application will no longer be used. Staff have found that in the past some applicants self-selected not to proceed with applying once they saw the application form and RTA will closely monitor if not providing a paper application in advance will impact the drop-off rate, thus driving up demand for appointments and increase the not-eligible rate as a result.

In-person assessments are conducted by professionals with a bachelor's degree who have a social service, psychology, or related background, and have worked in the disability field.

Travel training

Prior to the pandemic RTA had four travel trainers and one Orientation and Mobility Specialist on staff. Now, the eligibility contractor, Transdev, also conducts travel training, using the same number of staff. They are having challenges hiring an O+M Specialist, as these professionals can receive a much higher salary working for Veterans Administration hospitals.

During 2019 RTA trained 264 individuals and routinely had a wait list. The travel training program is highly customized to meet the needs of trainees. Approximately 20% of trainees are referred through the eligibility process, but the majority are recruited through mobility outreach to various social service agencies.

To promote the travel training program, even before individuals have begun the application process, applicants are prompted to seek information about riding fixed-route while calling in to the transit agency phone system. Staff also send out a travel training brochure with every application packet and educate applicants in the interview that they will not lose their eligibility if they ride fixed-route. If anyone expresses interest, staff immediately contacts them and "talks up" the program.

Lessons Learned

RTA's emphasis on educating applicants about fixed-route and other options has been very effective in managing the volume of eligibility applications. Forty percent of individuals who contact the agency with

the intention of applying for paratransit ultimately decide not to follow through with the process. In a comprehensive study conducted in 2011, a detailed examination of the drop-off rate at each step of the process confirmed that this reflected well-informed choices by members of the public. As a result, the individuals who follow through to the end of the process are very likely to be found fully eligible.

The report states: "While the RTA process finds only 1-2% of applicants Not Eligible, it is the opinion of the review team that this is not a sign of laxness in the process, but of direct and indirect screening of applicants at the front end and applicant self-selection out of the process."

San Diego MTS

Known for innovative approach to eligibility assessments during COVID, interview with Jay Washburn, Manager of Paratransit and Minibus

Current eligibility practice

MTS requests that applicants submit their applications before scheduling the interview. The application includes a professional verification form. The request to submit is not mandatory, but most applicants do comply, and this is considered an important approach to ensuring the effectiveness of the interview as the assessor has a chance to review the contents and customize the interview accordingly.

The eligibility process is fully the responsibility of a contractor; however, MTS reviews their eligibility recommendations before making a final determination. As stated previously, the process is limited to an interview, with no functional assessments. However, assessors do observe the applicant as they navigate the slope accessing the eligibility facility. They also observe applicants' speed of ambulation, their ability to sit, stand, and follow directions given to get to the room. The agency is considering complete functional assessments for the future, but they have not been ready to progress to that level, since moving from phone to in-person interviews was already a big step.

Table 13 San Diego MTS Eligibility Outcomes

Eligibility Outcome	New Applications	Recertifications
Unconditional	65%	75%
Conditional	21%	22%
Temporary	8%	2%
Not eligible	2%	Less than 1%

Eligibility conditions are routinely applied by call takers. Staff conduct path-of-travel assessments for all trip requests by conditionally eligible riders. MTS ascribes substantial cost savings to the practice because for every paratransit trip denied under these conditions, the agency calculates a savings of an additional eleven trips of the same kind. The MTS representative indicated that unless agencies are going to apply conditions, it's not worth their time and cost to implement thorough in-person assessments. Riders are referred to other services that will meet their needs.

Cost

Since the contract is based on a flat fee for personnel, the agency is not able to easily determine cost per assessment. This is particularly true considering recent application volume fluctuations. Pre-COVID the contractor was processing 2,400 applications per annum. For FY 21/22, the number was 1,700.

Assessment of the Success of the Video Assessment Pilot Program

During the approximately ten months prior to resumption of in-person interviews earlier this year, MTS implemented a video assessment pilot program that involved the placement of tablets at the front door of applicants. The applicants were then requested to situate the tablets in a location that allowed the assessor to remotely observe the applicants' ability to ambulate.

The agency indicated that the pilot program had mixed results. Providing tablets to applicants may have been more effective than conducting a phone interview, as it allowed assessors to make some visual observations. However, some staff at MTS had concerns about potential liability risks that limited their ability to observe people moving. The agency may decide to resume the program in the future, but in a more robust manner that allows for more extensive observations. It should be noted that this model is limited due to lack of information about the applicant's ability to maneuver in the community.

Lessons Learned

MTS found that when they were conducting telephone interviews, which they found to be of limited effectiveness, they received 4,000 applications annually. Within two years of shifting to in-person interviews, that number dropped to 2,000. MTS believes that this number represents the individuals who are most likely to be eligible and justifies the need for in-person assessments by avoiding unnecessary cost associated with large phone interview volumes and using those funds to provide better service to those who do meet the ADA requirements.

King County Metro, Seattle

Known for creating alternative transportation options for people with disabilities and initiating significant pre-application education for over 25 years, interview with Spencer Cotton, ADA Certification Administrator

King County Metro made a policy decision in the decade after the passage of the ADA to emphasize education of applicants at the first point of contact about the parameters of paratransit service and the availability of the travel training program, which was established in 1994. In recent years Metro has developed other programs suited to the mobility needs of potential paratransit applicants.

Programs include the Community Access Transportation program, or CAT, which provides transportation services in partnerships with jurisdictions and agencies who can provide more direct and less expensive services than ADA paratransit service. Metro also partially funds a system of sixteen community shuttles (Hyde shuttles) and a volunteer transportation program, which primarily serves shorter trips within communities and/or direct trips to medical appointments. As a result of this approach, Access Transportation, the ADA paratransit provider, serves more complicated, lengthier trips. The region's inter-county service requires transfers between different agencies, which are reportedly "seamless for the customer" who calls their call center, and the schedulers work out the transfer through an inter-agency agreement.

In recent years Metro has implemented many microtransit options, specifically intended to connect people to transit centers in their communities, which can provide a useful alternative for some paratransit trips. In addition, Metro staff help applicants apply for a taxi and community shuttle program, as well as register for the comprehensive Transit Instruction (Travel Training) program.

As a result of the educational approach and availability of alternative services, Metro's Access program has a lower volume of registrants than comparable systems, and prior to the pandemic that number was declining by 1-2% per annum. In 2007, Metro had over 30,000 registrants. The program currently has

11,400 registrants, representing an over 60% decrease in paratransit registrants in the past fifteen years. The current rate of new and recertifying applications is 424 per month, in contrast to 515 pre-COVID (a 17% decrease). Due to the proactive approach described above, only individuals who cannot ride fixed-route service apply, and the agency has a very low eligibility denial rate.

Eligibility Model

Prior to the pandemic, all applicants were required to participate in an in-person assessment. Applicants were required to get a professional verification form completed as part of their application process. Metro temporarily ceased the in-person requirement for just four months in 2020 following the onset of the pandemic. Metro resumed in-person assessments for all new applicants, unless they are unable to wear a mask due to a disability, in which case they are granted temporary eligibility. For those who are applying for recertification, a portion is required to participate in-person.

Although King County is relatively large (over 2,300 square miles) with a significant proportion of rural areas, the agency provides transportation for all applicant assessments. As part of the initial phone call, when rural applicants find out there is no paratransit service in their area, they sometimes choose not to apply.

Metro staff, consisting of seven full-time equivalent employees (FTEs) review applications, contact customers to discuss details of the application on the phone, answer questions on process, and talk about alternative options. This phone call can take five to 15 minutes. Staff are required to have experience working with people with disabilities.

For nearly three decades Metro has contracted with the Department of Rehabilitation Medicine at Harborview Medical Center, which is the public hospital for the county.

Harborview staff make a recommendation to Metro staff, who combine the evaluation information with the professional verification, application, and telephone notes to make an ADA paratransit eligibility determination.

Metro is currently examining the introduction of various digital elements to the process, including allowing customers to go online and request that a form be sent to their health care provider. The goal is to make the process more streamlined for the customer. Implementation is expected to take two years.

Use of Conditional Eligibility Category

Metro staff routinely apply eligibility conditions. One staff person is responsible for a variety of activities to ensure the effective use of the conditional eligibility category. They send follow-up letters to all those found conditionally eligible to explain what this means and offer to have a phone call to discuss alternative options. This staff person monitors trip patterns of conditionally eligible riders, and if they identify a trip that would be accessible on fixed-route, they inform the riders.

Cost

The 2022 contract cost per full assessment was $197 (this includes both physical and cognitive assessments). To ensure the long-term stability of the program, Harborview has a contract through 2030.

Lessons Learned

The agency summed up the reasons for the success of their eligibility program as follows:

1. The process of educating people before they apply about available alternative transportation options should be built into the paratransit eligibility process in a substantive way.
2. The agency provides significant alternative transportation options, as described above.
3. It took a long time to get to where they are now but has been a steady process of improvement over the past 25 years.

Capital Metro, Austin

Known for a hybrid model of in-house staff and eligibility contractor, interview with Sara Sanford, Manager Eligibility & Customer Services.

Due to significant application backlogs and staff limitations, Cap Metro currently requires in-person assessments for only a portion of all new applicants. During the pandemic period (which in terms of alternate assessments, lasted through March 2022) the agency granted presumptive eligibility to all applicants. After the resumption of in- person assessments, many who were granted less than full eligibility are now appealing the new determinations.

Prior to COVID the agency required all new applicants, in addition to 85% to 90% of those who were recertifying, to come in for an assessment. Applicants were granted four-year eligibility terms, instead of the more common three-year terms at other systems. Exceptions to the in-person requirement for those who were recertifying included those who were unconditionally eligible, those with dementia, and wheelchair users. Those subsets of the registrants were sent a one-page form to update their information.

Hybrid Model

Cap Metro staff conduct an initial review of all applications and refer about 65 – 70% of those to the contractor to conduct an interview and functional assessment. The qualifications of agency staff responsible for the initial review vary significantly, including professionals with a criminal justice background, a social worker, and an individual who has worked with those who have autism. The positions are open to anyone who has experience in social services and healthcare.

Eligibility Registration Base and Outcomes

Pre-COVID, the eligibility outcomes were as follows: 55-60% unconditional, 35-40% conditional, 15% transitional/temporary (up to two years) and 3-4% denials. Very few applicants appealed their determinations (until the current period post resumption of in-person assessments).

With a population of 960,000 (2020 Census), Austin has an ADA registration base of just 7,800. The registration base has been growing about 3% per year, while the population has grown 20-30% during this period.

Cost per Assessment and Staffing

The cost per assessment is not available as Cap Metro pays a fixed rate to their vendor to do more than eligibility assessments. This includes safety assessments for those who are registrants to make sure they can ride paratransit safely. The agency and the contractor each have 2 FTEs on staff (the latter being occupational and physical therapists). The contract is based on 1,500 assessments per annum.

Conditional Eligibility

Cap Metro routinely applies eligibility conditions. While call center staff apply the “easier” conditions such as night/day and weather, one FTE is responsible for applying environmental conditions (such as distance, terrain, etc.). In this capacity, the staff person audits trips and on-line bookings, sends

notification letters to those whose paratransit trip could have been taken by fixed-route service, and informs the rider about fixed-route options. Staff also work with those who have recently been determined conditionally eligible to find alternative transportation options.

In contrast to the plethora of alternative programs offered by King County, Cap Metro does not have many alternative programs. However, approximately five years ago they set up an office of mobility management. This office, which is housed in the agency's planning department, includes a trip planning specialist who helps people find options, such as TNCs, taxis, volunteer programs, microtransit, and fixed-route. In addition, the agency offers a travel training program, which used to be integrated with the eligibility function pre-COVID, but most travel trainees do not come through the eligibility program but are instead referred by non-profit organizations.

Austin provides "Pickup" microtransit in nine zones, some of which are centrally located, while others are outside of the fixed-route corridors. The cost per trip is $1.25, the same as a fixed-route trip. All vehicles are wheelchair accessible.

The agency was a pioneer in the microtransit field, and originally intended to provide connections to transit in lower density areas. When Pickup service is introduced into a new area, eligibility staff identify registrants who live in those zones, and contact them to promote use of the service, and promote travel training (with free rides during training). A "few people have shifted" from paratransit to Pickup service, which has a much higher productivity rate, and is more attractive to customers because of the spontaneity and response time of close to 15 minutes. Some of the zones have become so popular that the agency is considering replacing them with fixed-route service. Although the Pickup services did not originally replace low fixed-route productivity areas (which is commonly the case in other systems), the agency has recently started this approach. Overall, the decision to provide microtransit service is a challenging balancing act.

Lessons Learned

In an eligibility-related innovation, Cap Metro has implemented a "frontline feedback process." If drivers are concerned about a rider's ability to ride paratransit safely, they will call the dispatch department. Dispatch fills out a form based on driver input and submits it to the eligibility department.

The eligibility department in turn reviews the applicant's information on file, pulls a video from the rider's trip, and for those using mobility aids who are unsteady on their feet, requests them to come back in for discussion and education on potential risks.

This program was set up in response to complaints from the drivers who believed that their input regarding rider safety and behavior was being disregarded. The complaints usually proved to be well-founded, although occasionally the driver appears to be at fault (and one has even been terminated as a result). This program has considerably improved the relationship between the agency and paratransit drivers.

Recommendations

Near-Term Recommendations

Through this planning process, Bay Area transit agency staff have collectively determined the following recommendations to be implemented in the near-term, in the next 12 months.

1. Standardize application forms and provide application forms online

Develop and implement two standard application forms:

a) Agencies that use in-person assessments (short form)

b) All other agencies (longer form to compensate for the lack of information that can be gained in an in-person assessment)

Some agencies are planning to transition from phone interviews (which provide more information than paper-based models) to in-person assessments. These agencies may consider shifting from the longer form to the shorter form when this change is implemented. Consistent with recent trends, we recommend changing usage of the term "functional assessments" to "transit skills assessments."

Implement online application forms throughout the region, including translated versions to meet Title VI requirements.

2. Standardize two sets of intake interview protocols for agencies conducting in-person versus paper/phone based assessments

Since agencies conducting in-person assessments can gather information in the assessments that do not need to be obtained during the initial call, these protocols can be shorter than phone/paper based protocols. However, to achieve a level of standardization, some agencies will need to expand their intake calls to educate callers about mobility options and the intended role of ADA paratransit.

3. Standardize appeals process

All agencies will use the same appeals process. For smaller agencies and agencies without a standing agency committee, a regional standing committee may be formulated based on the recommendations in section 9.7.4 of FTA Circular 4710.1. This is particularly intended to benefit small agencies that do not have the resources to coordinate and implement a complex appeals processes.

4. Explore non in-person options for certain disability categories

This recommendation applies to individuals whose application is based on certain disabling conditions that cannot always be fully evaluated through an in-person assessment, such as certain cognitive disabilities, visual disabilities, psychiatric disabilities, and seizures disorders (e.g., submission of professional verification with possibility of telephone follow-up). These conditions occur intermittently or otherwise may not present themselves clearly during interviews or transit skills assessments. In such instances, a professional verification of the applicant's most limiting condition with the possibility of a telephone follow-up may be a more appropriate option. Since most agencies do not have this option included in the scope of their vendor contracts, we are recommending that this be implemented on an optional basis in the short term.

5. Increase application of trip conditional eligibility

For agencies that have experience with in-person assessments pre-COVID and/or have returned to in-person assessments, implement the following measures to increase application of eligibility conditions (trip screening):

- Evaluate and improve conditional eligibility language to make it more operational. Where possible, define conditional eligibility based on concrete metrics rather than general phrases.
    - For example, rather than indicating that a person is eligible for a trip due to "distance," indicate that they are eligible for a paratransit trip when the distance to the bus stop is more than three blocks on either end of the trip.
- Train eligibility and call taking staff to reflect more clearly defined conditional language.
    - For example, eligibility and call taking staff (and the registrant) should all share a similar understanding of the conditions under which their trip request is ADA-paratransit eligible.
- Implement protocol of contacting conditionally eligible riders by phone to clarify their eligibility conditions and discuss alternatives to paratransit.
- Consider implementing a staff "bus buddy" or offering a travel trainer to accompany rider on first fixed-route trip, even if they have not expressed an interest in more general travel training.

6. Adopt new standardized definitions of eligibility and renewal timelines

Table 14 New Standardized Eligibility Definitions

Level of Eligibility Outcomes	Definition
Unconditional	Applicant is unable to use the fixed-route network independently due to a disability or disabling health condition.
Conditional	Applicant has a disability or disabling health condition that prevents them from using the fixed-route network independently for some trips but not for others.
Denied	Applicant is ineligible for paratransit services because they were not found to have a disability or disabling health condition that prevents them from using the fixed-route network independently.
Incomplete	The application was found to be incomplete and returned to the applicant for completion.

Term of Eligibility Outcomes	Definition
Permanent[9]	Five years (increased from three years[10]) of eligibility followed by an abbreviated recertification process.
Temporary	Applicant is provided with up to five years of eligibility followed by a full recertification process.

Under the new standardized process, agencies should use information gathered during the initial application process where evaluators indicate that the applicant's ability to ride fixed-route transit is unlikely to improve. Therefore, riders would be asked to confirm their contact information and provide a

[9] Previously referred to as "Auto-Renewal," "Auto-Recert," "Renew by Mail."

[10] As a result of this planning process, transit agencies have begun making this change as of January 2024. All agencies are expected to complete this recommendation by mid-2024.

simple update regarding their disability status (e.g., mobility aids used, changes in health or disability since last certification date, etc.) rather than participate in a full recertification process when their eligibility expires. For both riders and agency staff this will reduce the burden associated with a full follow-up application process. In instances where an applicant's recertification questionnaire does suggest a material change in their ability to independently use fixed-route transit, the agency would initiate a second assessment, such as an interview, transit skills assessment, or a new professional verification.

Each eligibility determination includes both an eligibility level and an eligibility term. Best practice, according to §9.3 of FTA Circular 4710.1 is to include the applicant's eligibility level and expiration date (rather than "term") in the applicant's determination letter. Applicants found ineligible are free to reapply at any time.

7. Host paratransit eligibility trainings annually to enhance eligibility evaluators skills

Trainings can incorporate peer cross-evaluator ratings and other mechanisms to improve consistency and overall Quality Assurance/Quality Control. (Examples of training include National Transit Institute at Rutgers University, Easter Seals Project ACTION, and ADA Guru.)

8. Identify paratransit alternatives, enhance promotion, and incorporate travel training

Identify all accessible mobility options available in the community and ensure that these options are discussed in detail in the in-person and phone assessments. Ensure eligibility and travel training programs work in tandem (this strategy is already being integrated into the eligibility process at several agencies).

9. Develop on-going monitoring strategies for quality assurance

Agencies can adopt strategies that can be used to measure the impact of short-term recommendations to determine effectiveness and implement modifications as needed. These could include:

- Trends in eligibility outcomes
- Sample checking language used to describe eligibility conditions to ensure they are comprehensible and operational
- Secondary review of all eligibility denials
- Reviewing adherence to 21 day deadlines for eligibility determinations
- Reviewing the costs of eligibility assessments

10. Learn about new potential eligibility vendors

MTC and agencies will create a subcommittee to identify potential vendors that have rehabilitation expertise that can be adapted to in-person eligibility assessments. Agencies will reach out to these vendors to explain the process and generate interest in future contract solicitations. MTC will maintain an inventory of national and local eligibility vendors that can be used by agencies pursuant to their own procurement guidelines in future solicitations.

11. Explore technical solutions to enhance eligibility implementation

MTC and agencies will create a subcommittee during the planning process under the TAP Action 24, Recommend Paratransit Reforms to explore technical solutions to enhance accuracy and consistency of eligibility programs, and that will integrate eligibility and with upgraded scheduling and dispatching

software that uses continuous dynamic optimization.[11] Focus should be on those software programs that have an eligibility module that can be used by schedulers to consider trip eligibility limitations when scheduling a trip. Software solutions are expensive but integrating software systems between transit agencies could reduce costs for individual agencies.

Longer Term Recommendations to Consider

The following recommendations are based on the best practices assessment from beyond the Bay Area and would bring Bay Area transit agencies closer to across the board standardization. These recommendations would require major investments or a fundamental shift in how paratransit eligibility is handled in the region. Currently there is not a broad consensus among transit agency staff on these topics and both items would require a large investment.

1. Explore implementation of in-person assessments

It is recognized that some agencies have chosen to preserve their paper- and phone-based eligibility processes due to a variety of issues, including funding availability or in order to provide enhanced ADA services. These agencies may want to consider the expansion of in-person assessments. A well designed in-person assessment is considered the most in-depth method for achieving the most accurate assessment, however, this will increase the cost of determining eligibility.

2. Consider A Fully Integrated Regional System of Eligibility Centers

A fully integrated regional system would include the establishment of regional in-person eligibility centers to conduct ADA paratransit eligibility assessments for all transit agencies in the Bay Area. This model could incorporate a range of levels of assessments, with most applicants evaluated in-person, either through interviews or interviews plus transit skills assessments.

Subregional centers would ideally be implemented to balance the goal of merging functions to achieve economies of scale for systems that are near each other, while avoiding significant travel for paratransit applicants. To determine logical consolidation of facilities, further analysis will be needed to account for the specifics of each subregion, such as the distances applicants would have to travel to access each center and an assessment of counties' available resources to conduct assessments. This approach is also intended to address the needs of smaller systems that do not have the resources to hire rehabilitation specialists or establish separate travel training programs and appeal functions.

Eligibility centers could also serve as a one-stop shop for transportation disadvantaged riders who are informed of the variety of mobility options in their area, including the use of fixed-route transit, paratransit service, city, county, and non-profit based services, microtransit, taxi and ride-hail services, etc. Several agencies in the Bay Area have already integrated their eligibility tasks into a larger mobility management function, and this strategy is intended to expand on those efforts and incorporate multiple agencies in the process. Other considerations of a fully integrated regional system include determining the need for smaller satellite offices in more rural areas and considering the staggered timelines of current eligibility contracts (differing end points of each contract can pose a challenge to entering simultaneous contract arrangements).

[11] Transit Cooperative Research Program Synthesis 168, Continuous Dynamic Optimization: Impacts on ADA Paratransit Services (2023), *http://nap.nationalacademies.org/26907*

Next Steps

Ongoing Coordination

The Bay Area's transit agencies have already made significant progress towards many of the near term goals recommended in this report. However, progress has been uneven in some areas, and more work towards this remains to be done. Following acceptance of this report, staff will convene a Paratransit Eligibility Working Group consisting of MTC and transit and paratransit accessibility and eligibility staff. The mandate of this working group will be to track each agency's progress towards implementation of these recommendations and provide support and technical assistance as requested by agency staff. The working group will provide an updates to the region's paratransit coordinating councils and to the Regional Network Management Council.

Report to the Commission

Transit agencies will be asked to submit final implementation reports on Action 25 recommendations in early 2025. Staff will analyze and compile the reports and present the results of implementation activities to the RNM Council, the Regional Network Committee, and the Commission.

Appendix

Eligibility Process Overview

To enhance the standardization of paratransit eligibility processes across Bay Area agencies, the decision tree below can guide evaluators as they go through the paratransit eligibility evaluation.

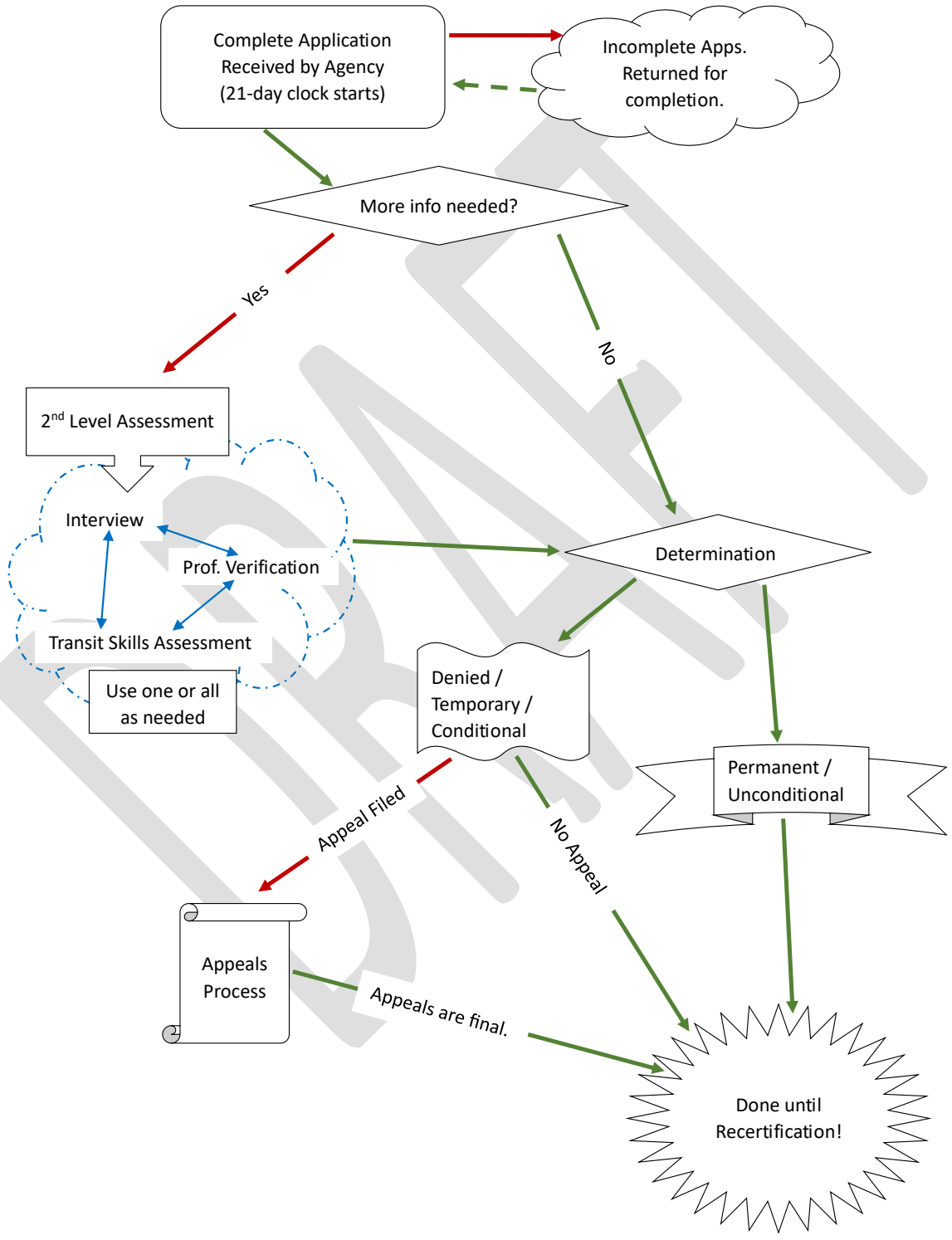

Figure 1: Eligibility Process Overview

Process for Conducting ADA Paratransit Eligibility Assessments

1. To the greatest extent practicable, ADA paratransit applications should be combined with applications for related programs within the greater mobility management framework, including travel training and the Regional Transportation Connection Clipper Access program. Application materials should be as easy as possible for any interested parties to access, including:
    a. Posted to transit agency websites, with links from other agency websites as appropriate.
    b. Paper copies available at senior centers, libraries, transit agency and other agency offices, etc.
2. Applicant submits completed application.
    a. If the submitted application contains sufficient information to determine eligibility, proceed to number 4 below.
    b. Return incomplete application with instructions for completion. In many instances, a follow-up phone call may be very helpful to explain why the application was returned and/or what additional information is required.
3. If necessary, conduct a second-level assessment, which may include one or more of the following elements.
    a. Applicant interview (in-person, via video conference, via telephone, etc.)
    b. Transit Skills Assessment
    c. Professional confirmation/verification, obtained from an appropriate licensed professional.

    Applicants must be provided transportation to and from any required in-person assessment activity.

    Note: the result of the Transit Skills Assessment should also be used as an initial assessment for the applicant's potential to be travel trained.
4. Record determination (in agency client files, dispatch software, and the Regional Eligibility Database), and send client eligibility letter. In all cases, the mailing should include information about other mobility programs that are or may be available to the applicant.
    a. If eligibility is Permanent and Unconditional, the process is complete for five years.
    b. If eligibility is other than Permanent and Unconditional (i.e., Temporary, Conditional, or Denied), instructions for filing an appeal must be included.
5. Applicants may appeal their eligibility determination if the determination is anything other than Permanent and Unconditional. Appeals will be conducted in a standardized manner agreed upon by the transit agencies that will allow applicants to state their case. A letter of finding will be issued to the applicant stating whether the appeals panel has upheld or modified the original determination.

Applicants must be provided with transportation to and from their appeal hearing. Appeals are generally considered final, regardless of outcome.

General Protocol for Eligibility Interview

- Explain that any information they provide will be kept confidential, to the extent practicable and shared only on a "need to know" basis (i.e., with other transit agencies) however, paratransit eligibility information is not HIPAA protected.
- Explain the purpose of the phone or video conference interview – "This is an opportunity for you to explain your travel abilities and your need for ADA paratransit service."
- Explain what will happen – "We will have a short phone interview which may result in a determination being made on your eligibility, or we may need some extra information from your treating professional, or you may be referred for an in-person assessment."
- Explain that ADA paratransit is adaptive bus service intended only for customers who are unable, because of their disability, to ride the fixed-route bus/train without assistance for some or all their trips.
- "There are a couple of different types of eligibility, either *Unconditional*, in which it is determined that you need ADA Paratransit for all your trips, or *Conditional*, in which you can use ADA Paratransit for some trips but are expected to ride transit for other trips. There is also *Temporary* eligibility in case your disability is short-term"
- "Do you have any questions about ADA paratransit eligibility?"
- Explain any other mobility options that may be available to the applicant. "There are also other programs available in your area for which you may qualify. I would like to give you some information on these programs after our interview, if that is all right with you."

Sample Interview Questions

All Applicants

- Please tell me how you currently travel outside your home?
- Have you ridden transit before?
    - What type of transit? Bus? Train? Streetcar?
    - When was the last time and how often?
    - How do you believe your disability prevents you from riding transit?

Applicants reporting mobility/physical impairments

- What about getting to and from transit?
    - Are you able to cross streets by yourself?
    - Are you able to cross large intersections?
    - Are you able to walk over uneven surfaces (grass, sand, gravel)?
    - Are you able to travel up a gradual hill?

    - How far would you be able to walk in ideal weather? How many city blocks?
    - Are there any barriers that affect your ability to travel to a bus stop on your own?
- Are there times when your condition changes?
    - Does weather affect your ability to travel? If so, how?
    - Are you undergoing any treatments that would cause your condition to manifest or be more severe at times? (i.e., dialysis, chemotherapy, electroconvulsive therapy, etc.)
    - Do you ever use a mobility aid, like a cane or a wheelchair? What type? How often? (Record details for all mobility aids/devices reported)
- Once onboard a bus or train:
    - Are you able to grip a handrail?
    - Are you able (do you have the dexterity) to pay your fare using the farebox or Clipper validator?
    - Some fixed-route transit involves standing. Please tell me about your ability to keep your balance in a moving vehicle.

Questions for Assessing Conditions that Cannot be Evaluated through an Assessment

Many agencies have found that certain disabling conditions, such as cognitive disabilities, visual disabilities, psychiatric diagnoses, and seizure disorders do not always lend themselves readily to complete evaluation through an interview or transit skills assessment, making accurate determinations in these cases particularly challenging. In many instances, a professional verification from the applicant's doctor, social worker, or other licensed practitioner can provide the needed information to complete the determination. Below are questions to be used if the primary basis for the individual's application falls in one of the following categories.

Applicants Reporting Cognitive Impairments

- Have you ever traveled alone on a bus? What would you do if you got lost?
- Have you had training to travel in the community? Which places did you learn to go to? Are you able to go to those places now?
- Can you understand and count out the bus fare without assistance?
- Are you able to read and use transit timetables or online schedules?

Applicants Reporting Visual Disabilities

- Can you describe how your visual limitations affect you?
- Are your visual limitations stable, degenerative, or otherwise changing?
- Do you have any disabilities besides vision that prevent you from riding the bus or train?
- Do you have a visual acuity statement from your treating professional? (FYI, 20/200 is legally blind)
- Do you use any mobility aids when you are outdoors?

- Can you walk alone outdoors? If yes, when can you travel? Can you go further than a block from your home?

If the applicant is partially sighted, ask the following questions:

- Can you see steps or curbs?
- Is your vision worse during daytime, nighttime, about the same in all lighting conditions?
- Can you clearly see bus signage including route number; are you able to differentiate between buses at a stop with multiple routes?

Applicants Reporting Psychiatric Diagnosis

- How do you feel your disability prevents you from riding transit?
- Is your condition controllable with medication?
    - Do you experience any side effects from the medication that would affect your ability to use transit?

Applicants Reporting Seizure Disorders

- How do your seizures prevent you from traveling on the fixed-route system?
- Does your condition prevent you from using the fixed-route system all of the time, or just at specific times? If specific times, when?

Additional Questions for All Applicants

- Do you have any disabilities or disabling health conditions besides what we have discussed that prevent you from riding the fixed-route system? (This is a very important question as applicants often have more than one condition but may have listed only the most limiting condition.)
- Have you considered getting instructions on how to ride transit? If not, are you interested? (Use this opportunity to explain other mobility options in the community that may be suited to the applicant.)

The above questions are relatively high level and will need to be tailored to the applicant and the application information. Additional questions may also be needed to get at the applicants' true abilities as well. The professional verification submission will provide more information in making an accurate determination. It is important that applicant healthcare providers listed on the application be contacted if eligibility is difficult to determine. Attempts to reach healthcare providers should be well-documented to ensure a timely turnaround of eligibility determination.

It is important to document all questions asked of the applicant along with their answers. It is also important to remember you only need information pertaining to the applicant's disability as it relates to their ability to use fixed-route transit. You are not collecting data on their overall health or the extent of their disability.

When to Conduct an In-Person Interview and/or a Transit Skills Assessment?

If the applicant does not fall into one of the categories listed above for a phone/video conference interview and the application does not provide enough information for an accurate determination, including whether the applicant may be able to ride transit some of the time, an in-person interview

and/or a transit skills assessment may be the most accurate method of determining eligibility. An in-person skills assessment is particularly necessary if the applicant could be conditionally eligible or denied eligibility.

Applicants should be asked to bring their primary mobility aid(s) and should be advised if the skills assessment will take place outdoors. Additionally, the transit agency must make travel arrangements to the interview site.