

**Lehigh and Northampton Transportation  
Authority (LANTA)**

**Allentown, Pennsylvania**

**April 27-30, 2009**

**ADA Complementary Paratransit Service  
Compliance Review**

*Summary of Observations*

Prepared for

**Federal Transit Administration**

**Office of Civil Rights**

**Washington, DC**

Prepared by

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with

**TranSystems Corporation**

**Final Report: December 30, 2011**

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# 1 Purpose of the Review

The U.S. Department of Transportation (DOT) regulations implementing the Americans with Disabilities Act of 1990 (ADA) requires public entities that operate fixed route transportation services for the general public to provide ADA complementary paratransit service for persons who, because of their disability, are unable to use the fixed route system. These regulations (49 CFR Parts 27, 37, and 38) include six service criteria that must be met by ADA complementary paratransit service programs. Section 37.135(d) of the regulations requires that ADA complementary paratransit services meet these criteria by January 26, 1997.

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

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

FTA conducted a review of ADA complementary paratransit service provided by the Lehigh and Northampton Transportation Authority (LANTA) based in Allentown, Pennsylvania, from April 27 to 30, 2009. Planners Collaborative, Inc. and TranSystems Corp., both located in Boston, Massachusetts, conducted the review for the FTA Office of Civil Rights. The review focused primarily on compliance of LANTA's ADA complementary paratransit service with the requirement in the DOT ADA regulations that this service be operated without capacity constraints (49 CFR § 37.131(f)).

Sections 37.123 through 37.127 of the DOT ADA regulations require that a process be established for determining who is ADA paratransit eligible and that eligibility determinations are made consistent with regulatory criteria. Section 37.129(a) requires that ADA complementary paratransit be origin-to-destination service. Section 37.131(a) requires that ADA complementary paratransit service be provided between origins and destinations within 3/4 of a mile of fixed bus routes and between points within a 3/4-mile radius of two different rail stations. Section 37.131(b) requires that next-day service be provided. Section 37.131(c) limits ADA complementary paratransit fares to no more than twice the full fixed route fare for a comparable trip. Section 37.131(d) requires that ADA complementary paratransit service be provided without restrictions or priorities based on trip purpose. Section 37.131(e) requires that ADA complementary paratransit service be provided during all days and hours that fixed route service

is provided. Section 37.139(g) requires that complementary paratransit plans address efforts to coordinate with other public entities that have contiguous or overlapping ADA complementary paratransit service areas.

The review also examined LANTA’s ADA complementary paratransit eligibility determinations, rider assistance policies, and ADA complementary paratransit service criteria.

This report summarizes the observations and findings of the on-site review of LANTA’s ADA complementary paratransit service. Chapter 2 explains the approach and methodology used to conduct the review. Chapter 3 then describes key features of transit services provided by LANTA—fixed route bus and ADA complementary paratransit service. Chapter 4 summarizes the findings that are also presented at the end of the remaining chapters. Chapter 5 includes observations and findings related to rider assistance policies, service area, fares, trip purposes, days and hours of service, and coordination with other public transit entities. Observations and findings related to the eligibility determination process are presented in Chapter 6. Observations and findings related to the capacity constraint prohibition, as well as additional observations on response time, are then presented in Chapters 7-10 on telephone service, reservations, service performance and resources. Recommendations for addressing some of the findings are also provided.

LANTA was provided with a draft copy of the report for review and response. A copy of the correspondence received from LANTA on December 9, 2011, documenting their response to the draft report, is included as Attachment A.

## 2 Overview

This review focused primarily on compliance with the DOT ADA requirement that ADA complementary paratransit be operated without capacity constraints. The regulations identify several possible types of capacity constraints including: waiting lists for trips, limits on the number of trips provided, and patterns or practices that result in a significant number of trip denials missed trips, untimely pickups, or excessively long trips. Capacity constraints may include any operating policies or practices significantly limit the amount of service to persons who are eligible for ADA complementary paratransit.

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

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

This review also includes observations and findings related to five other sets of policies and practices that could affect access to ADA complementary paratransit service:

- Rider assistance policies
- Service area, response time, fares, trip purposes, and service times
- Efforts to coordinate with other ADA complementary paratransit services in the area
- ADA complementary paratransit service eligibility process
- Telephone capacity

The review also addresses scheduling, dispatching, operation of service and an analysis of resources as a potential contributor to capacity constraints.

### 2.1 Pre-Review

The FTA Office of Civil Rights sent a notification letter to LANTA's Executive Director, Armando V. Greco, on January 30, 2009, confirming dates for the review and requesting that information needed by the review team be sent in advance of the review. The notification letter is provided in Attachment B.

Based on the information received from LANTA, the review team examined key service information prior to the visit. This information included:

- A description of how LANTA's ADA complementary paratransit service is structured
- Current contract with Easton Coach
- Easton Coach Company Operator Manual
- Metro Plus Rider Handbook
- Public information and brochures describing LANTA's ADA complementary paratransit service

- LANTA’s standards for on-time performance, trip denials, travel times, and telephone call-handling
- LANTA Metro fixed route system map
- LANTA Metro Plus ADA service area map
- Samples of completed operator manifests from previous six months
- ADA complementary paratransit operating data for previous six months
- Capital and operating budget for FY 2006, FY 2007, and FY 2008
- As requested by FTA, LANTA made additional information available during the visit. This information included:
  - Service data, including electronic files of raw data
  - Procedures for reporting complaints and comments
  - Records of customer comments and complaints related to capacity issues: trip denials, on-time performance, travel time, and telephone access
  - Staffing charts for various departments
  - Pullout records
  - Vehicle inventory
  - Additional capital and operating budgets and cost data

In addition, the review team contacted several riders, disability advocates, and disability agency staff to get comments on their experiences with LANTA’s ADA paratransit service.

## 2.2 On-Site Review

An on-site review of the ADA complementary paratransit service took place from April 27 to 30, 2009. The review began with an opening conference, held at 9 a.m. on Monday, April 27 at the LANTA offices at 1060 Lehigh Avenue, Allentown, Pennsylvania. Attendees were:

Armando Greco	Executive Director
Denis Meyers	Assistant Executive Director
Melissa Gemelli	Assistant Executive Director
Joe Scott	President, Easton Coach
David Batchelor	VP of Operations, Easton Coach
Leonard Koury	Operations Manager, Easton Coach
Rosemary Gerty	TranSystems (team leader)
Thomas Procopio	TranSystems
Jim Purdy	Planners Collaborative
Sue Clark	FTA Office of Civil Rights (via telephone)
Deborah Haines	FTA Region III Civil Rights Officer (via telephone)

Ms. Clark opened the meeting by thanking LANTA and Easton Coach, its contractor, for opening its office and operations to the review. She mentioned that the review team would make every effort to complete the review with as little disruption to the LANTA/Easton Coach operation as possible. She also invited LANTA staff to contact her directly should they have any



questions or concerns about the review. Ms. Clark stated that the main purpose of the review was to assess compliance with the ADA requirements. She also noted that the review team had significant experience with ADA complementary paratransit operations and encouraged LANTA to utilize the review team for technical assistance.

Ms. Clark stated that FTA sees the compliance reviews not just as a way to assess LANTA’s operation of services, but also as an opportunity to determine if LANTA has the resources necessary to comply with the American with Disabilities Act of 1990. She mentioned that preliminary findings and an opportunity to respond to them would be provided at a closing meeting on Thursday, April 30 and encouraged LANTA to ask questions about the preliminary findings as well as possible approaches for addressing any issues that might be identified.

Rosemary Gerty of TranSystems then presented the schedule for the on-site review, including the parts of the operation that would be observed each day. A copy of the review schedule is provided in Attachment C.

Following the opening conference, the review team met with LANTA and Easton Coach managers to discuss the information sent in advance as well as the information and material that was available on site. The review team clarified LANTA’s operating policies and procedures, reviewed the Metro Plus budget and resources, and discussed the status of an ADA complaint filed with FTA. After touring LANTA’s facilities in Allentown, the review team spent the remainder of the day at Easton Coach in Easton, observing reservations, reviewing the telephone system and performance reports, and observing dispatch operations.

On Tuesday, April 28, the review team returned to Easton Coach to continue its observations of trip reservations and dispatch and met with the schedulers to discuss procedures used to develop the final operator manifests. The review team also began examining records for on-time performance and travel time verification and began interviewing drivers..

On Wednesday, April 29, the review team met with the LANTA staff member responsible for managing the eligibility determination process and reviewed application files. The review team continued the analysis of on-time performance and travel time and completed driver interviews. The vehicle inventory was reviewed and vehicle inspections were performed with vehicles representing each model year in the fleet. The review team also traveled to Easton Coach’s satellite operations facility in Whitehall.

On Thursday, April 30, the review team completed the data analysis and prepared for the exit conference. The exit conference began at 1:30 p.m. at the LANTA office. Attendees were:

Denis Meyers	Assistant Executive Director
Melissa Gemelli	Assistant Executive Director
Joe Scott	President, Easton Coach
David Batchelor	VP of Operations, Easton Coach
Leonard Koury	Operations Manager, Easton Coach
Rosemary Gerty	then TranSystems (team leader)
Thomas Procopio	TranSystems
Jim Purdy	Planners Collaborative
Susan Clark	FTA’s Office of Civil Rights (via telephone)

Ms. Clark opened the exit conference by thanking LANTA and Easton Coach for their cooperation in the review. Ms. Clark reiterated that the goals of the review were to assess

compliance and to provide technical assistance on ADA complementary paratransit services. She stated that a copy of the draft report will be provided to LANTA for review and comment. Once the draft is transmitted to LANTA, the report would be subject to release in response to Freedom of Information Act (FOIA) requests. LANTA's comments on the draft would be incorporated into a final report, and the final report will be posted on FTA's website.

Ms Clark advised that LANTA will be required to respond to the findings presented in the draft report. Recommendations, which do not require a response, will be offered as suggestions for addressing the findings and LANTA may consider the recommendations in developing responses to the findings.

Those findings that require corrective action will be presented in a reporting table for LANTA to use in reporting proposed corrective actions and a timetable for making required changes. LANTA will then prepare follow-up progress reports for FTA review until FTA releases LANTA from follow-up reporting.

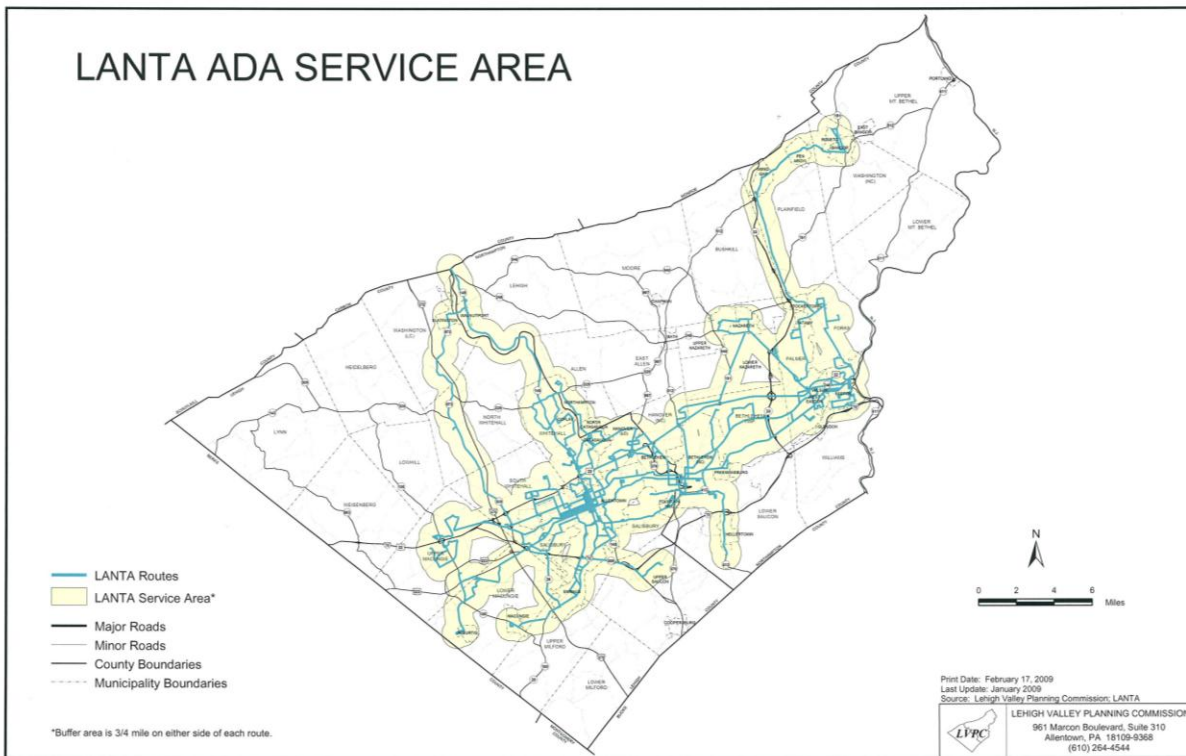
Ms. Clark encouraged LANTA to begin addressing findings discussed during the on-site review while awaiting the draft and final reports. She also invited LANTA staff to contact FTA or the review team for technical assistance over the next several months if they decided to move ahead with corrective actions.

The review team members also thanked the LANTA and Easton Coach staff for the cooperation they had provided throughout the week. They then presented initial findings in each of the following areas:

- Service design (rider assistance policies, service area, response time, fares, trip purposes, days and hours, and coordination)
- Eligibility determinations
- Telephone access
- Handling of trip requests
- On-time performance
- Trip duration
- Resources (vehicles, personnel, and financial planning and budgeting )

### 3 Background

LANTA provides Metro fixed route bus and Metro Plus paratransit services in Lehigh and Northampton Counties, located about 65 miles northwest of Philadelphia. The Metro Plus service area includes the cities of Allentown, Bethlehem, and Easton, as well as the surrounding boroughs and townships. The total population is approximately 650,000 and about 380,000 people reside in the ADA service area (see Figure 3.1).



**Figure 3.1 – LANTA’s ADA service area**

LANTA has been involved in providing “specialized” demand-responsive services to people with disabilities and older adults for more than 30 years. The service began with creation of a centralized “special service” private, non-profit organization that was established to coordinate targeted transportation services in the community. The intent was to have a central entity to provide the services to individuals directly or through social service agencies to avoid duplication of services. Toward that end, the Valley Association for Specialized Transportation (VAST) was created in 1977 and began operations in 1978 with the acquisition of local vans and other resources.

VAST grew to own and operate 36 vehicles and, by the mid-1980s, was providing services to local agencies and meeting the needs of thousands of people with disabilities and older adults residing in both counties. At the same time, the two counties were independently managing the Shared Ride program, providing subsidized trips for people aged 65 and older with funding from the Pennsylvania Lottery under the management of the Pennsylvania Department of Transportation (PennDOT). The two counties then engaged a consultant to determine whether

the coordination of services could include Shared Ride and the Department of Public Works (DPW) Medical Assistance Transportation Program (MATP).

The consultant recommended creation of a division within LANTA that would oversee the management and administration of the coordinated program, with operations being provided through competitive contracts with private entities. In 1988, Metro Plus was formed and began providing service with VAST and two private for-profit operators.

After passage of the ADA, LANTA developed a Paratransit Implementation Plan in consultation with a community advisory committee. LANTA's fixed route bus fleet was to become fully accessible over a decade-long fleet replacement program and Metro Plus would be expanded to meet the ADA paratransit service requirements. In 2005, LANTA hired a consultant to study what changes could be made to improve productivity and efficiency within the Metro Plus program. The consultant noted a duplication of effort between the two existing paratransit contractors and recommended that LANTA seek proposals for a single operator in its next procurement. In July 2006, LANTA signed a contract with Easton Coach Company (ECC) to operate the Metro Plus service. It compensates its contractor on a monthly fixed cost basis plus a payment for the total number of trips completed. LANTA does not pay for no-shows or cancellations for ADA paratransit trips. This approach resulted in substantial cost savings.

In 2008, LANTA was awarded a grant to provide service under PennDOT's Persons with Disabilities program, which provides access to discounted fares on Metro Plus for people with disabilities who reside and travel outside the ADA service area. Service provided under this grant was not the subject of this ADA complementary paratransit compliance review.

### **3.1 Description of ADA Complementary Paratransit Service**

Metro Plus service is operated under contract with Easton Coach Company. About 2,000 trips are provided each weekday on the Metro Plus system, 40 percent of which are ADA complementary paratransit trips.

LANTA's main office is located in Allentown, with a second operating facility in Bethlehem. Eligibility, complaint, and other Metro Plus records are kept at the Allentown office, located at 1060 Lehigh Street. LANTA also has a satellite facility at 1200 Conroy Place in Easton, where the Easton division Metro buses are stored and dispatched. Some minor maintenance work is also performed in Easton.

LANTA owns 118 standard vans and minibuses that it leases to ECC for the provision of Metro Plus paratransit service. The fleet was purchased through a combination of Federal, State, and local capital funds and is maintained by ECC as specified under the terms of the contract. LANTA checks ECC's maintenance records on a monthly basis and performs a physical inventory of the Metro Plus fleet annually. Metro Plus has a satellite location at 3668 Crescent Court in Whitehall.

LANTA also purchases and provides all software and hardware for Metro Plus. The "TransView" computer program is used for recording trip requests, scheduling, and dispatching trips. TransView provides manifests via mobile data terminals (MDTs) placed on each Metro Plus vehicle. Vehicles are also equipped with two-way radios. Operators and dispatchers communicate primarily by MDT regarding schedule changes throughout the day. Operators use

pre-programmed MDT buttons to indicate arrival and departure times from origins as well as destinations so that trip records are created showing time of arrival at both origin and destination, mileage, and trip length. Throughout the day, Automated vehicle location (AVL) shows the location of every vehicle (updated every 2 minutes) () and also creates a record of each operator's activity over the workday.

Service is provided from 7 a.m. to 7:30 p.m. Monday through Saturday and from 9 a.m. to 7:15 p.m. on Sundays. Fares are \$3.35 per one-way trip and are paid by ticket, which must be purchased in advance. Reservations are accepted from 8 a.m. until 4 p.m., Monday through Friday from the day before service is requested, up to 14 days in advance of the trip. Riders wishing to book a trip for Sunday or Monday are advised to call before the close of business on Friday. Because Metro Plus serves riders who may be eligible for trip subsidies from a variety of programs including MATP (Medicaid) and other sponsors, riders are asked to identify the trip purpose so that LANTA can invoice the appropriate funding source. Furthermore, because the Shared Ride program pays 85 percent of the cost of the trip for older adults, customers who are 65 and older are coded as "Shared Ride" for invoicing purposes, even if they would also be eligible for ADA complementary paratransit service. All trips are provided under the same operating policies and service standards, regardless of funding source.

## **3.2 LANTA's ADA Complementary Paratransit Performance Policies and Standards**

The following description of service policies and standards are based on public rider information, material submitted by LANTA in response to FTA's notification letter, and interviews with LANTA staff. Material directly reference is taken from LANTA documents.

The review team's observations associated with each standard are described in Chapters 7, 8, and 9. LANTA's policy is that all passengers receive the same level of service and the policies and standards are the same for all passengers, regardless of funding source.

### **Telephone Service Standard**

At the time of the review, LANTA's telephone service standard required that 90 percent of the time, calls would not be left on hold for more than 2 minutes. There was no standard for calls on hold longer than 2 minutes. Many transit systems use an additional standard to address the percentage of calls with very long wait times, for example, more than 5 minutes.

The need to revise this standard is discussed in Chapter 7.

### **Reservations Policy**

At the time of the review, the Metro Plus Customer Ride Guide stated that "all requests for trips are accepted on a first-come, first-served basis. There are no 'wait-lists' – any trips that are booked are provided."

Metro Plus provides "next-day service." This means that requests for trips for a particular day may be made any time during the preceding day. However, Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip. Customers may make ride reservations up to fourteen (14) days in advance.

The need to revise this standard is discussed in Chapter 8.

## **Trip Denial Standard**

At the time of the review, LANTA's stated policy was to accommodate all eligible customers registered with the LANTA Metro Plus system, regardless of home location, distance traveled, or unique transportation needs.

This policy is discussed further in Chapter 8.

## **Missed Trip Standard**

At the time of the review, the contractor was expected to make all scheduled pickups; however, there was no written standard regarding missed trips, when ECC fails to provide a trip.

## **Vehicle Wait Time Policy**

At the time of the review, LANTA's vehicle wait time standard indicated that, "drivers will wait 5 minutes for a passenger when the van arrives within the on-time window. An attempt will be made to alert the passenger that the van has arrived."

## **No-Show Policy**

At the time of the review, LANTA's Metro Plus Customer Ride Guide, included as Attachment D, defined "no-show" in the context of customer responsibilities and sanctions for repeated instances of not appearing for a scheduled pickup:

A "no-show" is recorded when: customer books a trip and, when the van arrives, the customer is not available for travel or waves the driver on. The van operator will wait 5 minutes past the scheduled pick-up range of time. No-shows do not include trips that are missed for reasons that are beyond the customer's control for, instance; scheduling problems, late pick-ups, and other operational problems. An example of a no-show beyond the customers control would include a situation where the van is late and the customer has found an alternate source of transportation.

No-shows and cancellations can result in a denial of service to other customers. That is, a no-show or a cancellation is a "wasted trip" that could have been provided to another customer. Once any period of suspension is ended, service may be reinstated by the customer calling Metro Plus.

LANTA's suspension policy for excessive no-shows is discussed in Chapter 6.

## **On-Time Performance Policies and Standards**

In its response to FTA's information request, LANTA's stated on-time performance standard for pickups and drop-offs was:

The on-time performance standard for the LANTA Metro Plus system is 90%. This is comparable to the on-time performance of the Metro fixed-route bus system.

A pickup is considered on be on-time if it is made within 15 minutes before or after the negotiated pickup time. A drop-off is considered on time if it is made no more than 15 minutes after the negotiated pickup [sic] time.

There was no standard applicable to early drop-offs.

The ECC operations manager monitors the on-time performance standard daily by formally reviewing the “Performance Issues Report,” which provides detail of all trips that fall outside of the on-time performance standard.

The need to revise these on-time standards is discussed in Chapter 9.

## **On-Board Travel Time Standard**

LANTA’s response to FTA’s information request included its travel time standard:

The standard for maximum travel time for an individual trip is twice the amount of time that an equivalent trip would take on the fixed route (LANTA Metro) system including transfer time.

ECC monitors trips daily for excessive length (more than 4% of total ADA Trips) and formally reviews the “Performance Issues Report” that details all trips with a trip length in excess of two hours.

Customer complaints about excessive trip length are handled directly by the [ECC] Vice President of Operations or by the Operations Manager.

There is no standard for the maximum overall trip time or the percent of trips that may exceed such a maximum time, although the monitoring procedure described in LANTA’s submission suggests that two hours is the guideline used by ECC in identifying trips that may exceed the standard of twice the fixed route travel time.

The need to revise this standard is discussed Chapter 9.

## **3.3 Customer Input**

### **FTA Complaint and Service Issues**

As the time of the site visit, FTA had one complaint on file concerning LANTA’s ADA complementary paratransit service. In July 2007, the Lehigh Valley Center for Independent Living filed 117 complaints from 56 individuals with the FTA Office of Civil Rights. The complaints alleged violations of Title II of the ADA by LANTA, Metro Plus, and its contractors. The complainants’ general allegations were that they had experienced:

- Significantly untimely pickups either for initial or return trips
- Trip denials or missed trips
- Trips with excessive trip lengths
- An inability to schedule service due to busy signals or long hold times
- Standing order trips that were not being honored or not being cancelled when no longer needed
- Poor customer service from drivers and dispatchers
- Lack of adequate backup capacity to handle same-day problems
- Inefficient scheduling of paratransit trips
- Unsafe driving practices by paratransit drivers.

During the subsequent months, ECC investigated these issues and prepared a response for both FTA and Pennsylvania DOT. In a letter to Metro Plus dated September 17, 2007, ECC outlined systemic actions taken to address the issues raised in the complaint. In December 2007, LANTA provided information requested by FTA in response to the complaint.

LANTA responded that at the time of the complaint service had been provided by multiple contractors and LANTA was in the process of transitioning to a single contractor, ECC. LANTA acknowledged that there were difficulties during that period and the transition was an attempt to address them review team considered this input when conducting the review of LANTA's Metro Plus service.

## **Customer Comments**

Prior to the site visit, the review team conducted telephone interviews with six Metro Plus riders and two representatives of agencies who work with Metro Plus riders. Most riders stated that they have been riding for at least two years, and one reported riding for 28 years, predating Metro Plus. Each interviewee was asked for input on various aspects of the service, including:

- Eligibility determination process
- Telephone hold times, trip denials, and getting trips scheduled at desired times
- On-time performance
- On-board travel times
- Vehicle operator assistance and professionalism
- Vehicle condition

Review team members also asked for any other input on the service not covered by the specific questions. Please refer to Chapters 5 through 10 for summaries of the customer comments related to the service issues covered in the respective chapters.

## **Rider Comments on File at LANTA**

A review of the complaints for January through April 2009 identified 23 individuals who filed 26 complaints about six different issues. Table 3.1 shows the distribution of complaints for January through April 2009. The table shows that 31 percent of the complaints received during the first 4 months of 2009 were about late pickups another 31 percent pertained to driver attitude/conduct. Fifteen percent were about missed trips, with 12percent for careless driving. Because LANTA did not distinguish between ADA and non-ADA complaints, the review team could not determine if all 26 complaints were related to ADA complementary paratransit services.



**Table 3.1 – Metro Plus Complaints: January 1, 2009 through April 28, 2009**

<b>Type of Complaint</b>	<b>Number of Complaints</b>	<b>Percent of Total Complaints</b>
Late Pickups	8	31%
Driver Attitude/Conduct	8	31%
ECC Missed Trip	4	15%
Careless Driving	3	12%
Early drop offs	2	8%
Late (not specified)	1	4%
<b>Total*</b>	<b>26</b>	<b>100%</b>

\*Total exceeds 100 percent due to rounding

## 4 Summary of Findings

This chapter summarizes the findings made as a result of the review. Findings denote deficiencies in ADA compliance or topics on which FTA requires additional reporting to ensure an ADA compliance issue does not exist. Findings shall always require corrective action and/or additional reporting. Recommendations are statements detailing suggested changes to policy or practice to ensure best practices under the ADA. The basis for findings and recommendations are detailed in Chapters 5 through 10.

### 4.1 ADA Complementary Paratransit Service Criteria and Complaint Handling Process

1. Complaints may be received on the Metro Plus telephone line, in the LANTA fixed route call center or via the LANTA web site. Customers may also call ECC directly with a complaint. However, there is no information concerning the complaint process in the printed or on-line versions of the Metro Plus Customer Ride Guide.
2. LANTA does not maintain a summary of complaints received. In order to meet Part 27 obligations, LANTA must establish a process to keep copies of all complaints received for one year and to maintain a summary of complaints received for five years.
3. LANTA requires ECC to respond to customer complaints within 48 hours, which may be too short a time for a thorough investigation/resolution of the complaint.
4. LANTA provides Metro Plus service on Sunday during the same hours of service as its fixed route. With regard to Metro Plus service on Sunday, there is a discrepancy between the Customer Ride Guide and LANTA's website. Metro Plus does not provide service prior to 7 a.m. on weekdays and Saturdays, although many fixed routes began operating between 5:15 and 6 a.m. This discrepancy in weekday service hours does not meet the requirement under §37.131(e) for hours and days of service.
5. LANTA does not accept reservations on Saturdays, Sundays or holidays for Metro Plus service. This is inconsistent with §37.131(b)(1), which requires provision of reservation service during at least all normal business hours as well as during times comparable to normal business hours on days when LANTA's offices are not open before a service day.
6. Statements such as "Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip" implies that there may be insufficient capacity to accommodate trip requests made the previous day. This may discourage riders from attempting to schedule and use the service. This may also constitute a prohibited capacity constraint on ADA complementary paratransit service.

### 4.2 ADA Complementary Paratransit Eligibility

1. The paratransit application indicates that it may be submitted online but the staff and the Customer Ride Guide state that applications must be signed and returned with an original signature. No faxes or e-mails are accepted.
2. The Metro Plus Ride Guide states that ADA paratransit eligibility is based on whether an applicant's home is located within the ADA service area. LANTA staff stated that they

understand that ADA paratransit eligibility cannot be based on the location of an applicant's home address, but this misinformation may lead some persons not to apply for eligibility. LANTA is responsible for ensuring that its Metro Plus ADA complementary paratransit service accepts and reviews applications from any person wishing to use the service, to meet its obligations as a fixed route provider under §§ 37.121(a) and (b) and § 37.123(a) and (b).

3. The application includes a professional verification section, which must be completed by a physician. LANTA does not allow other health care professionals—such as occupational therapists, physical therapists, and orientation and mobility specialists—to provide the professional verification. Completion of this portion of the form could require applicants to make an appointment and pay for a doctor's visit. This requirement could therefore be construed as a prohibited special charge or "user fee" under § 37.5(d) or a prohibited undue administrative burden on applicants under § 37.125 and as explained in Appendix D.
4. The professional verification section asks a number of detailed questions about the nature of the person's diagnosis, along with questions relating to people with physical or cognitive disabilities but only requests visual acuity and field of vision information for persons with vision impairments. This information may not provide enough information about a person's inability to use fixed route transit.
5. The professional verification section of the application asks for information about the applicant's ability to travel various distances "without assistance." This phrase may be misleading to a professional who is unfamiliar with the DOT ADA regulations. According to § 37.123 and explained in more detail in Appendix D, LANTA should assess a person's ability to travel independently without the assistance of another person (except the operator of a wheelchair lift), rather than his or her ability to travel without any assistance.
6. As of the time of the review team's site visit, LANTA never requested that its riders recertify for ADA paratransit eligibility. Furthermore, eligibility determinations had no expiration date, other than for riders certified for temporary disability.
7. In 2008 LANTA began to review its database and stated that it planned to deactivate anyone who has not used the service since 2007. LANTA is not permitted to terminate eligibility to ADA complementary paratransit eligible riders based on use/non-use of the system. As explained in Appendix D of the DOT ADA regulations at § 37.125, once LANTA certifies a rider as eligible for ADA complementary paratransit, the individual's eligibility takes on the coloration of a property right. Before eligibility can be removed "for cause," LANTA must provide due process to the individual. Use or non-use of the system is not a justification for removing an eligible rider from LANTA's database. LANTA is permitted to ask applicants to recertify eligibility for Metro Plus service and establish reasonable expiration dates for eligibility at that time.
8. The Metro Plus Customer Ride Guide indicates that LANTA makes a determination of conditional or unconditional eligibility. At the time of the site visit, LANTA granted conditional eligibility, but did not impose conditions on individual trip requests. The Metro Plus rider database in use at the time of the site visit did not include sufficient information on each rider's functional abilities for a call-taker or scheduler to determine if a rider could use fixed route service for a given trip, should LANTA choose to impose conditions in the future.

9. LANTA does not conduct in-person interviews or assessments as part of the eligibility determination process for Metro Plus. In-person interviews or assessments are usually necessary in order to implement a conditional eligibility determination process.
10. The information provided in the eligibility determination letters sent to applicants who have been denied ADA eligibility do not provide enough specificity about why an eligibility determination was made. This information is required by 49 CFR 37.125(d), which states that determinations of eligibility must be in writing, and if applicants are found to be ineligible, the determination must state the specific reasons for the finding. Appendix D to Part 37 explains that these reasons cannot merely state that the person has been found to be able to use fixed route service.
11. Certain eligibility determinations appear to link the applicant's home address or the distance from the applicant's home to the nearest bus stop as a factor in determining ADA eligibility. An applicant's home address should play no role in determining eligibility. Linking the eligibility determination to the distance between the applicant's home and the nearest bus stop is not appropriate because it does not consider the destination or transfer requirements that may not be navigable for the applicant. The wording in eligibility notification and appeals process information also appears to base ADA paratransit eligibility upon an applicant's address within the Metro Plus service area.
12. LANTA's public information on the eligibility process implies that fixed route travel must be impossible for the applicant. This must be changed, as it may discourage potentially eligible persons from applying for the service.
13. LANTA does not have a centralized log or database in which it tracks the processing of ADA paratransit applications, determination outcomes, appeals requests or outcomes, or suspension appeals or outcomes. All such information is recorded only on each individual application.
14. LANTA automatically enrolls any applicant who is 65 or older in the Shared Ride Program, and shifts persons with ADA eligibility to this program when they reach age 65; this does not conform to the process requirements of § 37.125. Billing a ride to another program is acceptable if the service is identical to that provided under Metro Plus complementary paratransit, but a person's ADA eligibility must be established and preserved regardless of age, and the process must be fully in conformance with the ADA regulations in all respects regardless of the person's age or eligibility for other programs.
15. The appeal process involves the Executive Director, which is inconsistent with the requirement in § 37.125 of the DOT ADA Regulations for a separation of function. The regulations and Appendix D explanation make it clear that the persons who made the decision being appealed their supervisors and subordinates should not participate in the appeal process.
16. LANTA requires that the applicant appealing a determination must include a letter from the physician regarding the basis of the appeal. The burdensome nature of this requirement and the two-step appeal process may discourage applicants from exercising the right to appeal.
17. LANTA's appeal process did not include a provision to permit the applicant to waive the hearing and proceed on the basis of the written record.

18. LANTA’s public information, determination letters, and appeals process information needs to be revised to conform with all the required elements of §§ 37,125(d), (g), and (h) of the DOT ADA regulations. LANTA must remove references to bus stop proximity and the impossibility of fixed route travel, correct inconsistencies, and accurately reflect that an applicant’s ADA paratransit eligibility is not based on residency within the service area.
19. LANTA’s written no-show policy indicates that riders are suspended when they no-show three times in a period of 30 days, with escalating suspensions if the practice continues. Although LANTA stated that it was not enforcing the no-show policy at the time of the review, a policy that considers three no-shows in a one-month period could unreasonably limit service to ADA eligible customers if put into practice. Appendix D of the DOT ADA regulations states that suspensions of eligibility for no-shows are intended to prevent “a pattern or practice of missing scheduled trips” to “deter or deal with chronic ‘no-shows.’” Appendix D also explains that “a pattern or practice involves intentional, repeated or regular actions, not isolated, accidental or singular incidents.”
20. While LANTA’s no-show policy correctly states that a customer is not assessed a no-show if the circumstances are beyond the rider’s control, all of the examples given relate to service issues related to Metro Plus, such as late trips or scheduling errors. The list should also include examples of excused no-shows on the rider’s side, such as illness, hospitalization, or other circumstances beyond the rider’s control.
21. The LANTA no-show policy includes a consequence where a customer may be “automatically” suspended from service for 30 days. Riders must receive 15 days’ notice of suspension and be notified the date the suspension will start.
22. LANTA policy states that when a customer’s suspension has ended that the customer must call to reinstate service. It is not the responsibility of the customer to call to reinstate service. LANTA is responsible for reinstating service to the customer.

### **4.3 Telephone Access**

1. LANTA has a telephone performance standard that states “all calls will not be left on hold for more than 2 minutes and that will be achieved 90 percent of the time.” However, the standard does not specify when the standard should be met, e.g., 15-minute, 30-minute intervals, nor does it indicate a maximum allowable hold time e.g. 95 percent of calls should be answered within three minutes, and 99 percent of calls should be answered within five minutes.
2. ECC does not directly monitor call answering performance against the LANTA standard.
3. Analysis of three weeks of incoming call data from the reports used by ECC at the time of the site visit found that 51 percent of calls are received during time periods when the longest wait exceeds 2 minutes and 24 percent are received during time periods when the longest wait exceeds 3 minutes. In 4 to 9 percent of the time periods in these three weeks, the average wait time exceeded 2 minutes. The portion of calls not answered ranged from 1 to 2 percent in the three weeks.
4. For 15-minute time periods when there were 14 or fewer calls, 23 percent of the periods had calls that waited more than 2 minutes; for periods when there were 15 or more calls, 68 percent had calls that waited for more than 2 minutes.

5. Based on the available downloadable call data, it is likely that the LANTA's performance standard is not being met on an hourly, daily, and possibly weekly basis.

## 4.4 Trip Reservations and Scheduling

1. LANTA recorded seven trip denials for the 10-month period prior to the review. LANTA could not determine whether these denials were for trips requested by ADA or non-ADA passengers.
2. LANTA's policies do not explicitly address the requirement to schedule trips within one usable hour of the customer's requested time.
3. LANTA accepts reservations Monday through Friday from 8 a.m. until 4 p.m. Reservations are not accepted on weekends or holidays. As a result, next-day trips cannot be booked for Sunday, Monday, or the day after a holiday. The DOT ADA regulations require that, at a minimum, an agency accept trip requests made the day before the trip (49 CFR § 37.131(b)). Requests must be accepted during normal business hours, including on days that the agency may not otherwise be providing service.
4. Metro Plus does not accept trip requests for service prior to 7 a.m. on weekdays and Saturdays, although many fixed routes began operating between 5:15 and 6 a.m. This discrepancy in weekday service hours is inconsistent with the DOT ADA regulation for hours and days of service.
5. During call observations, customer service representatives (CSRs) appeared to accept most of the requested trip times without negotiation, and the negotiated trip times that were observed did not constitute denials. However, CSRs routinely scheduled drop-offs 15 minutes before the requested time and return trip pickups 15 minutes after the estimated end of doctor visits and similar appointments without the callers' knowledge. This may result in earlier drop-offs and later return trip pickups. Differing presumed drop-off and pickup times can also create confusion between riders and the drivers and dispatchers and can contribute to no-shows.
6. CSRs were observed advising customers to make reservations at least two or three days in advance, as stated in the Ride Guide. The analysis of reservations in the observed calls suggests that customers may feel pressured to schedule trips at least three days in advance in order to receive service at the times they wish to travel. This practice, together with the statement in the Ride Guide that Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip, likely discourages some Metro Plus riders from using the service when they cannot request a trip well in advance, and may deny service to these riders. It is inconsistent with the next day service requirement in the DOT ADA regulation for LANTA to request a minimum of two to three days' notice be given for adequate scheduling of a trip, nor for CSRs to ask that customers do this.

## 4.5 Service Performance

1. LANTA considers a drop-off to be on time if it is made no more than 15 minutes after the negotiated pickup time. All early drop-offs are considered acceptable, regardless of how early before the requested drop-off time. This is not appropriate because very early drop-offs are extremely inconvenient and can be hazardous for many paratransit riders. In addition, there is no performance standard for drop-offs.

2. The travel time standard for Metro Plus is twice the amount of time that an equivalent trip would take on the LANTA fixed route system, including transfer time. There is no standard for the maximum overall trip time or the percentage of trips that may exceed such a maximum time. The LANTA travel time policy is inconsistent with the requirement that ADA complementary paratransit service be comparable to fixed route service, 49 CFR § 37.121, and the long trip times constitute a capacity constraint.
3. Review team interviews with 10 ECC Metro Plus drivers found some variation in the drivers' understanding of the on-time pickup window.
4. Reservations are accepted until 4 p.m. The scheduling process for the next day is completed by early afternoon and callbacks begin as early as 2 p.m. This means that schedulers may be adjusting schedules after CSRs have called riders with their pickup times.
5. Some subscription trips that are not assigned to or locked on a run and subsequently moved during the batching process do not appear on the call-back sheets used by CSRs to notify passengers of their pickup times.
6. During the scheduling process there are instances where scheduled times are changed without prior notification to, or consent from the customer.
7. Although the scheduling process was well documented, the process does not include an ECC review of completed schedules.
8. LANTA's on-time performance for pickups was 68 percent for ADA trips in March 2009 and 65.6 percent for January to March 2009. This falls substantially short of LANTA's on-time pickup performance standard of 90 percent. Late pickups comprised 22.8 percent of all pickups. This level of performance is an "operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons..." which is inconsistent with 49 CFR § 37.131(f)(3).
9. Based on LANTA's standard for on-time drop-offs, on-time performance for ADA trips during January to March 2009 was 72.5 percent, i.e., 27.5 percent of trips were later than the rider's requested appointment time. This level of performance is an "operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons..." and is inconsistent with § 37.131(f)(3).
10. LANTA stated that use of the "raw" data from TransView underestimates the actual on-time performance for Metro Plus pickups. Based on LANTA's analysis, the review team adjusted the on-time performance of pickups for ADA trips for January to March 2009 by 3.9 percent, to 69.5 percent. This adjusted on-time performance for pickups is still well below LANTA's standard of 90 percent. In addition, this level of performance is an "operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons..." and is inconsistent with § 37.131(f)(3)(i)(A).
11. Based on an additional analysis of 30 long trips, 57 percent had travel times that were in excess of fixed route travel times for the same origin/destination pairs. Based on this analysis, it appears that LANTA has a significant number of trips with ride times in excess of comparable fixed route travel times.

## 4.6 Resources

1. The Metro Plus fleet consists of 108 minibuses using Ford and Chevrolet chassis. This fleet of 108 vehicles for a maximum pullout of 105 vehicles does not allow for sufficient spare capacity, and sometimes there are no spares available during peak service. Particularly if drivers are added to accommodate rising demand, the fleet will need to be enlarged.
2. LANTA's Metro Plus FY 2009 operating budget was projected to increase by 14 percent compared to FY 2008. Over 90 percent of the operating budget is allocated to purchased transportation, primarily Easton Coach. However, based on the poor on-time performance and long trip lengths—as described in Section 9—it appears that LANTA may need to devote additional resources to Metro Plus.
3. Based on a Transit Cooperative Research Program (TCRP) model for paratransit demand estimation, LANTA service area is estimated to have an annual paratransit demand of 235,221 trips. Ridership classified by LANTA as ADA trips was 15 percent below the ridership predicted by the TCRP model. However, if the trips taken by ADA-eligible riders 65 years and older—classified by LANTA as Shared Ride trips—were included in the ADA ridership, it is likely that the LANTA figure would exceed the figure predicted by the TCRP model. Improvement in on-time performance and reduction in the proportion of long trips would likely increase paratransit usage.



## 5 ADA Complementary Paratransit Service Criteria

This chapter presents information about LANTA’s ADA complementary paratransit service policies with respect to the DOT ADA regulatory criteria under § 37.129 (a) or § 37.131 for each of the following:

- Type of service
- Service area
- Hours and days of service
- Fares
- No trip purposes
- Efforts to coordinate with adjoining transit systems

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

Observations concerning the response time requirement are discussed in Chapter 8; while observations concerning the requirement that ADA complementary paratransit service be operated without capacity constraints appear throughout the report.

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

### 5.1 Customer Comments

None of the Metro Plus riders or agency representatives contacted in advance of the site visit had any comments concerning the type of service, service area, days and hours of operation, fares, or trip purposes.

Two respondents raised concerns about the complaint process. They felt that there was a process, but never saw it in any written materials.

### 5.2 LANTA Complaint Handling Process

The DOT ADA regulations require public transit providers to receive complaints from riders, resolve them promptly and equitably and to keep copies of complaints on file for one year and maintain a summary of complaints on file for five years (49 CFR 27.13(b) and 27.121(b)). While requirements to respond to complainants are not included in the DOT ADA regulations, it is a common and effective practice for a transit provider to respond to complainants and for transit providers to investigate allegations to ensure that all DOT ADA requirements are being met.

A review of the material sent by LANTA prior to the review, combined with the on-site staff interviews, revealed that there is no information concerning the complaint process in the printed or on-line version of the Metro Plus Rider’s Guide. The Guide instructs riders to call LANTA at 610-432-3200 or ECC at 610-253-4055 to file a complaint. Complaints may also be received in the LANTA fixed route call center, via the LANTA web site, or by e-mailing LANTA or ECC.

If the complaint is received directly by LANTA, the customer service representative records the complaint in a three-part Customer Service Form (see Attachment E). This form is used for both Metro fixed route and Metro Plus complaints. One copy of the complaint is distributed to the

Executive Director, a second copy is distributed to the Deputy Executive Director. The third copy is sent to ECC for investigation and response. By contract, ECC is required to respond within 48 hours of receiving a complaint. Although quick response to complaints is beneficial in general, this period may be too short for a thorough investigation/resolution of the complaint.

LANTA maintains hard copies of the complaints it received and those received by ECC, the resolutions provided by ECC (e.g. driver discipline or retraining), and written responses sent by LANTA to complainants to explain what action was taken. These records are organized by month. The LANTA staff person responsible for managing the complaint process issues a quarterly report on the number of complaints received. ECC also enters each complaint into an Excel data base for tracking purposes. The spreadsheet maintained by ECC contains complaint details and the resolution.

When ECC investigates the complaint, it may contact the customer to obtain more information about the complaint. If ECC is able simply to resolve the issue during a conversation with the customer Metro Plus is informed of the resolution of the complaint, and the process ends with ECC's documentation of the call, which it transmits to LANTA. If ECC cannot simply resolve the issue in this manner, they investigate the complaint and report to LANTA the results of the investigation and any action taken to discipline or correct the driver. LANTA then sends a letter to the complainant with the result of the investigation.

The review team inspected LANTA's complaint records and found that 26 complaints regarding Metro Plus had been received in the 12 months prior to the review. Four of the 26 complaints had been filed directly with ECC. Twenty two of the 26 complainants were filed with LANTA/Metro Plus directly. Out of the 22 complaints filed directly with Metro Plus, two were filed on-line. LANTA does not separately file ADA-related and other complaints.

Nineteen of the 22 complaints received directly by Metro Plus were sent to ECC for investigation within one day of receipt. One complaint was sent two days after receipt, one three days after receipt, and one five days after receipt. ECC responded to the complaints from one to 11 days after receiving the complaint from LANTA, the average time of response was within five days.

### **5.3 Type of Service**

Section 37.129(a) of the DOT ADA regulations states that ADA complementary paratransit service must be provided on an "origin-to-destination" basis. Transit agencies may designate the "base" level of rider assistance that they provide as either curb-to-curb or door-to-door. According to DOT topical guidance and FTA technical assistance, if the base service is curb-to-curb, transit agencies must have procedures in place to provide additional assistance beyond the curb if this is needed for eligible riders to complete their trips. This might include assisting riders to and from the front door and policies and procedures for providing this assistance in a safe and reasonable way.

LANTA meets this regulatory requirement by providing door-to-door service as the basic level of service for Metro Plus. The Metro Plus Customer Ride Guide (Attachment D) states:

Metro Plus is a 'door-to-door' service which means drivers will accompany passengers to and from the front doors of the origins and destinations if necessary. Under no circumstances is a driver required to go 'through the door' on either a pick-up or a drop-off.

## 5.4 Service Area

Section 37.131(a)(1) of DOT ADA regulations requires a transit provider operating fixed route bus service to provide complementary paratransit service that covers, at a minimum, all areas within 3/4 of a mile of all of its bus routes, along with any small areas within its core service area that may be more than 3/4 mile from a bus route, but which are otherwise surrounded by served corridors. The service area for ADA complementary paratransit service must include areas outside of the defined fixed route jurisdiction—such as beyond political boundaries or taxing jurisdictions—that are within 3/4 mile of the transit operator’s fixed route, unless the public transit agency does not have the legal authority to operate in those areas. For entities operating a light rail or rapid rail system, the paratransit service area includes a 3/4-mile radius around each station, with service provided from points within the service area of one station to points within the service area of another.

Metro Plus provides service to all points within the LANTA service area that are within 3/4-mile of fixed route bus service as well as all small areas surrounded by these corridors but more than 3/4-mile from a bus route; therefore, LANTA meets the service area requirement for Metro Plus service.

## 5.5 Days and Hours of Service

Section 37.131(e) of the DOT ADA regulations requires that the ADA complementary paratransit service be available during the same hours and days as the fixed route service. This means that if a trip can be taken between two points on the entity’s fixed route system at a specific time of day, it must also be able to be taken on paratransit. It also means that the service area may change depending upon the time of day or day of the week, when certain routes or areas may not be served. This requirement applies on a route-by-route basis. For example, an area that has fixed route bus service on weekdays but not weekends must have ADA complementary paratransit service (provide trips) on weekdays but not necessarily on weekends; an area that has bus service from 5 a.m. until 9 p.m. must have ADA complementary paratransit service, at minimum, from 5 a.m. until 9 p.m.

The Metro Plus Customer Ride Guide states:

Metro Plus operates during the same hours that LANTA Metro city transit services are available: 7:00 am - 7:30 pm on weekdays and Saturdays, and 9:00 am – 7:15 pm on Sundays. On weekdays and Saturdays, there is also evening service available in the area served by Metro’s Starlight [fixed route] service from 7:30 to midnight. Starlight times vary by route, so consult these schedules to see if Metro Plus service will be available.

At the time of the site visit, the information on LANTA’s Metro Plus website gave different information: “Metro Plus operates Monday - Saturday 7 a.m. to 7 p.m. and Sunday (call for hours).”

In fact, many LANTA weekday and Saturday fixed route services begin their schedule between 5:15 a.m. and 7 a.m. Thus, Metro Plus does not meet the requirement for providing ADA complementary paratransit service during days and hours identical to those for fixed route service.

Sunday fixed route services begin between 9:35 and 10:30 a.m., and makes the last stop between 6:20 and 7:15 p.m.. LANTA will meet the requirements DOT ADA regulations at §37.131(e) after it adjusts its paratransit service hours to match those for fixed route service, and updates its website.

## 5.6 Fares

Section 37.131(c) of the DOT ADA regulations requires that paratransit fares be no more than twice the fixed route fare for the same trip at the same time of day on the fixed route system, excluding discounts. In addition, fares for individuals accompanying ADA complementary paratransit riders must be the same fare as for the paratransit rider. Personal Care Attendants (PCAs) must be allowed to travel at no charge. Finally, a transit system may negotiate a higher fare to a social service organization or other organization for trips which are guaranteed to the agency.

At the time of the review, the one-way fare on LANTA fixed route services was \$2; Metro Plus uses a ticket system for fare payment and cash is not accepted on paratransit vans. Tickets are \$3.35 for a one-way fare, regardless of distance. Personal Care Attendants (PCAs) traveling with an eligible customer ride free. Guests (also called “companions”) traveling with the eligible customer must pay the ADA fare. Traveling with more than one guest is subject to space availability. Response Time Requirement

The DOT ADA regulations require that trip requests made the day before the trip must be accepted, scheduled, and provided (49 CFR § 37.131(b)). Requests must be accepted during normal business hours, including on those days that fixed route and ADA complementary paratransit service would otherwise not be provided (e.g., trip requests taken on Sunday for a trip on the following Monday). Section 37.131(b) also allows transit agencies to negotiate pickup times with riders up to one hour before or after the pickup time requested by riders.

The Metro Plus Customer Ride Guide provides the following information about scheduling service:

Metro Plus provides ‘next-day service.’ This means that requests for trips for a particular day may be made any time during the preceding day. However, Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip. Customers may make ride reservations up to fourteen (14) days in advance.

Metro Plus provides more than 2,000 trips each day! The more flexible you are and the more advanced notice you give, the more likely your trip will be scheduled.

You may call to schedule your Metro Plus trip up to 14 days in advance, and you may call up to 4 p.m. the day before you'd like a ride. **There is NO same day service.**

To make a trip reservation, call Easton Coach at 610-253-8333 between 8:00 a.m. and 4:00 p.m., Monday through Friday.

The call taker will confirm your reservation. Due to the equipment availability, driving conditions, or destinations, trips may have to be rescheduled or, in rare cases, canceled. You will be notified of any changes as soon as possible.

The Metro Plus office is closed Saturdays, Sundays, New Year's Day, Easter Sunday, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

LANTA's Metro Plus does not comply with the requirement to provide next day service because there is no provision for making a next-day reservation on Saturdays, Sundays or holidays. LANTA must also accept reservations during normal business hours through the day before service is to be provided until 4 p.m. according to LANTA's definition of its normal business hours. Furthermore, statements such as "Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip" implies that there may be insufficient capacity to accommodate trip request made the previous day, which would discourage riders from attempting to schedule and use the service, which would also be a violation of the ADA regulatory requirement prohibiting capacity constraints on ADA complementary paratransit service. The need to revise this policy is discussed in Chapter 8.

## 5.7 Trip Purpose

Section 37.131(d) of the DOT ADA regulations require that there be no restrictions or priorities based on trip purpose in the provision of ADA complementary paratransit service.

The Metro Plus Customer Ride Guide states:

According to the ADA, no trips can be given priority. Medical trips, work trips, and recreational trips are handled on an equal basis.

There are no restrictions on trip purpose. All requests for trips are accepted on a first-come, first-served basis. There are no 'wait-lists' – any trips that are booked are provided.

As discussed in Chapter 3 of this report, Metro Plus is a coordinated system serving a variety of trip sponsors and programs. In some cases the various service areas may overlap with the ADA service area. As such, Metro Plus uses multiple billing codes for the several transportation programs being served. An example is an ADA-eligible customer who is also eligible for the Pennsylvania Department of Welfare Medical Assistance Transportation Program (Medicaid). An MATP-eligible trip to a doctor's office would be billed to the "MATP" code, while an ADA (non-MATP trip) would be assigned to the "LAN" billing code, and the rider would be charged the regular Metro Plus ADA fare. For this reason, if a destination such as a hospital or medical building does not indicate whether a trip could be billed to MATP, the customer service representatives (CSRs) may ask the caller his or her trip purpose, but only to determine the correct billing code, not to prioritize or restrict any trips. During call observations, the review team did not hear a caller question why a CSR asked about their trip purpose, and no explanations were volunteered by the CSRs.

## 5.8 Coordination with Adjoining Service Providers

When developing their paratransit plans, transit systems were required under Section 37.139(g) to include efforts to coordinate with transit systems with overlapping or contiguous service areas for paratransit riders who want to travel between service areas.

LANTA provides fixed route bus service in Carbon County, adjacent to the Metro service area, through a contract with Carbon County. LANTA Metro Plus serves the Carbon County

Community Transit service area on the same basis as the Metro Service area. There are no other adjoining service providers.

## 5.9 Findings

1. Complaints may be received on the Metro Plus telephone line, in the LANTA fixed route call center or via the LANTA web site. Customers may also call ECC directly with a complaint. However, there is no information concerning the complaint process in the printed or on-line versions of the Metro Plus Customer Ride Guide.
2. LANTA does not maintain a summary of complaints received. In order to meet Part 27 obligations, LANTA must establish a process to keep copies of all complaints received for one year and to maintain a summary of complaints received for five years.
3. LANTA requires ECC to respond to customer complaints within 48 hours, which may be too short a time for a thorough investigation/resolution of the complaint.
4. LANTA provides Metro Plus service on Sunday during the same hours of service as its fixed route. With regard to Metro Plus service on Sunday, there is a discrepancy between the Customer Ride Guide and LANTA's website. Metro Plus does not provide service prior to 7 a.m. on weekdays and Saturdays, although many fixed routes began operating between 5:15 and 6 a.m. This discrepancy in weekday service hours does not meet the requirement under §37.131(e) for hours and days of service.
5. LANTA does not accept reservations on Saturdays, Sundays or holidays for Metro Plus service. This is inconsistent with §37.131(b)(1), which requires provision of reservation service during at least all normal business hours as well as during times comparable to normal business hours on days when LANTA's offices are not open before a service day.
6. Statements such as "Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip" implies that there may be insufficient capacity to accommodate trip requests made the previous day. This may discourage riders from attempting to schedule and use the service. This may also constitute a prohibited capacity constraint on ADA complementary paratransit service.

## 5.10 Recommendations

1. With the exception of real-time service complaints, LANTA should directly receive and process all customer complaints and comments to ensure that complaints are properly recorded, investigated, and resolved.
2. Communicate the complaint process to customers as documented in the Metro Plus Customer Ride Guide and on-line). Include a specific telephone number at LANTA where customers are directed to call when they wish to make a complaint or comment.
3. LANTA should consider extending the 48-hour time period for ECC to respond to complaints to allow sufficient time for complaints to be investigated, except for time-sensitive complaints related to accidents or incidents. The longer response time will allow ECC more time to do thorough investigation and provide a detailed response to LANTA.

4. Extend the Metro Plus service hours on weekdays and Saturdays to cover the areas where fixed route service is operating.
5. Correct the discrepancy between the Customer Ride Guide and the website and clearly state the Sunday service hours for Metro Plus.
6. Provide a means to accept next-day reservations on weekends and holidays.
7. Remove statements such as “Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip” from all of its public information, as it could discourage riders from using the service.

## 6 ADA Complementary Paratransit Eligibility

### 6.1 Eligibility Determination Procedures and Practices

Section 37.121 of the DOT ADA regulations requires transit systems to establish a process for determining ADA complementary paratransit eligibility including who is eligible, timelines for processing applications, recertification requirements, how appeals are handled, and how the process is described in public information documents

The review team examined the process used to determine applicants' eligibility for ADA complementary paratransit service to ensure that determinations are being made in accordance with the regulatory criteria and in a way that accurately reflects the applicants' functional ability. The review team also assessed timeliness of the processing of requests for eligibility and carried out the following tasks:

- Obtained information about the eligibility determination process through interviews with riders and advocates and a review of consumer comments on file at LANTA's
- Developed an understanding of the handling and review of applications through an assessment of eligibility materials and interviews of eligibility determination staff
- Reviewed eligibility determination outcomes for the period of Month through Month Year
- Reviewed the application files of applicants denied ADA complementary paratransit eligibility
- Reviewed no-show policy and procedures

#### Customer Comments

The customers and agency representatives interviewed were asked if they experienced any problems in the eligibility review and whether eligibility notification was prompt. Their responses indicated that they had not experienced problems in the determination process or with receiving notification within 21 days.

#### Metro Plus Coordinated Services

Metro Plus uses the same vehicles to provide coordinated, door-to-door demand response service for a variety of programs including the Pennsylvania State Lottery Shared Ride Program, Medical Assistance Transportation Program (Medicaid), ADA paratransit service, and PennDOT's Rural Persons with Disabilities (PwD) program, along with other agency-sponsored trips. Except for service area coverage and specific eligibility requirements of the DOT ADA regulations, the service policies and procedures are the same for all types of Metro Plus trips. Billing codes are assigned on a trip-by-trip basis to determine whether the passenger pays a fare and the amount to be charged to a particular program or agency sponsor.

The Customer Ride Guide (Attachment D), describes eligibility for each program as follows:

1. The Pennsylvania State Lottery Shared Ride Program is a program only for people 65 and older who cannot ride or do not have access to the regular Metro, city transit bus services.



An application and proof-of-age is required for eligibility. Customers pay 15% of the total trip cost; the balance is paid through State Lottery proceeds.

2. The Medical Assistance Transportation Program through the Pennsylvania Department of Public Welfare must meet the income categories that DPW maintains. The purpose of this program is to provide people who are financially disadvantaged with access to transportation to access necessary medical treatment. The DPW pays the full fare for people who are eligible for this program. An eligibility application is required as well as a check on eligibility within the State DPW database for both the person and the services accessed. The lowest cost, most effective transportation mode is selected for each customer and these range from reimbursement for auto mileage expense, to reimbursement of regular Metro city transit fares, to free access to Metro Plus paratransit service.
3. The Americans with Disabilities Act of 1990 made it a civil protection under the law for people with disabilities to have access to federally sponsored public transit services. Persons with disabilities in the community who, because of their disability are prevented from boarding a LANTA Metro city transit bus that operates within  $\frac{3}{4}$  (three-quarter) mile of their home may ride Metro Plus.
4. The Persons with Disabilities (PwD) program is available to people who do not live within the ADA service area and who are not sponsored by any other available program. Eligibility is determined through a submission of a written application with a medical professional's verification. Metro Plus staff will assess whether or not there are other programs in the community that could underwrite the fare or discount the fare to the passenger applying. PwD fares are the same as Shared Ride fares (15% of the total trip cost).

The reference to “federally sponsored” public transit services in paragraph 3 above is incorrect and must be modified. The ADA would apply even if LANTA did not receive federal funds.

For invoicing and fare calculation purposes, Metro Plus assigns billing codes according to a funding eligibility hierarchy depicted in Table 6.1. One-way fares are \$3.35 unless MATP or another agency sponsor sponsors the rider. Others may also ride by paying the full cost of the trip (\$22.15).

**Table 6.1 – Metro Plus Trip Eligibility/Funding Matrix**

Trip Location	Program Eligibility			
	→	→	→	
	MATP Eligible	Persons 65 & Older	Eligible Individuals < 65 Years Old	Other Agency Sponsors or General Public
Within ADA Service Area			ADA Paratransit	
To/from or within Lehigh and Northampton Counties Outside ADA Service Area			PennDOT People with Disabilities Program	
Entire Metro Plus Service Area	MATP	Lottery Shared Ride Program		Trip cost paid by agency or passenger
Beyond Metro Plus Service Area	MATP			

- As shown in the table, a rider whose trip is eligible for MATP funding is automatically assigned to that funding program code; the customer is not charged a fare because DPW pays the entire cost of the trip regardless of eligibility for another program funding source. MATP trips are also provided outside the Metro Plus service area, typically using minivans purchased by the contractor to help augment resources.
- As shown in the next column, anyone who is 65 or older and eligible for the Shared Ride Program is assigned to that program’s billing code, regardless of whether they would also be eligible for ADA paratransit service. The Lottery pays for 85 percent of the trip cost and the passenger pays the \$3.35 fare, which is the same as the ADA paratransit fare. It was mentioned that LANTA does not specifically identify in its database those individuals 65 and older who would also be ADA paratransit eligible. Staff stated that there has been no need to track these passengers as “ADA-eligible” because the Metro Plus coordinated transportation program does not differentiate among passenger types with respect to operating policies and procedures, other than eligibility for funding programs.
- The next column shows that for eligible individuals with disabilities who are less than 65 years old and cannot use fixed route service, trips are billed in one of two ways. Trips are either billed to the ADA billing code for trips that begin and end within the ADA paratransit service area or are billed as “PwD” for eligible trips provided to origins and/or destinations that are outside the ADA paratransit service area, but within the rural two-county service area. As with Shared Ride, passengers are charged a \$3.35 fare.
- Finally, as shown in the last column, other agency-sponsored or other riders also may use Metro Plus service by paying the full cost of the trip, funded by an agency or by the individual, as appropriate.

## ADA Paratransit Service Eligibility

Section 37.125(b) of the DOT ADA regulations requires that all information about the process, materials necessary to apply for eligibility, and notices and determinations concerning eligibility be available in accessible formats, upon request.

Section 137.125(c) of the DOT ADA regulations requires transit systems to make a determination of ADA complementary paratransit eligibility within 21 days of the receipt of a completed application, or treat the applicant as eligible and provide service until the eligibility determination has been made.

Section 37.125(d) of the DOT ADA regulations states that determinations of eligibility must be in writing and if applicants are found to be ineligible, the determination must state the specific reasons for the decision. Appendix D to the regulations indicates that these reasons cannot be a simple recital that the person has been found to be able to use fixed route service. The specific reasons must relate to the regulatory criteria and the LANTA's eligibility process. Decisions that deny or limit eligibility also must include information about the process for appealing the decision.

Section 37.125(e) requires the transit system to provide documentation to each eligible individual stating that he or she is "ADA complementary paratransit eligible" and include the following information:

1. Name of the eligible individual
2. Name of the transit system
3. Telephone number of the transit system's paratransit coordinator
4. Expiration date for eligibility
5. Any conditions or limitations on the individual's eligibility, including the use of a PCA

Section 37.125(f) permits the transit system to require recertification of the eligibility of ADA complementary paratransit eligible individuals at reasonable intervals.

Section 137.125(g) outlines a process for administering appeals through which individuals who are denied eligibility can obtain review of the denial. The transit system is permitted to require that an appeal be filed within 60 days of the denial of an individual's application. The appeal process must include an opportunity for the denied applicant to be heard and to present information and arguments. The decision on the appeal must be made by a person not involved with the initial decision to deny eligibility, must be written, and must explain the reasons for the decision. During the appeal period, the transit system is not required to provide paratransit service to the appellant. However, if a decision is not made within 30 days of the completion of the appeal process, the appellant must be provided paratransit service from that time until and unless a decision to deny the appeal is issued.

Section 37.127 of the DOT ADA regulations requires that paratransit service be made available to visitors who do not reside in the jurisdiction(s) served by the transit system. Visitors who present documentation that they are ADA paratransit eligible in the jurisdiction in which they reside are to be treated as eligible. For visitors with disabilities who do not present such documentation, the transit system may require documentation of the individual's place of residence and, if the individual's disability is not apparent, of his or her disability, and must accept a certification by such individuals that they are unable to use the fixed route system.

Section 37.127(e) of the DOT ADA regulations requires that a public entity shall make the service to a visitor required by this section available for any combination of 21 days during any 365-day period beginning with the visitor's first use of the service during such 365-day period.

As explained in Appendix D, an eligible rider does not need to live within the ADA service area in order to be eligible for service. Eligibility is based on an individual's functional ability to use fixed route service. If an eligible rider lives outside of the paratransit service area and can get to a pickup point within the service area, he or she must be provided with service from the pickup point to destinations within the service area

While the Metro Plus Ride Guide states that ADA paratransit eligibility is based on whether an applicant's home is located within the ADA service area, LANTA staff stated that they understand that ADA paratransit eligibility cannot be based on the location of an applicant's residence and that anyone who is eligible for ADA paratransit services, including visitors, is able to travel to and from destinations within the ADA service area, regardless of the location of their residence. The primary reason that LANTA makes a distinction about an applicant's residence is existence of the PwD program, which provides trips for eligible individuals with disabilities who live within the Metro Plus service area and whose trips begin and/or end outside the ADA paratransit service area.

### **Application and Certification Process**

Section 37.123 of the DOT ADA regulations contains the regulatory eligibility standards for ADA complementary paratransit service, with further explanatory text provided in Appendix D to this section. As specified in §37.123(e)(1) & (2), eligibility is based on whether an individual can travel independently on the fixed-route system without the assistance of another person, other than the vehicle operator deploying the lift or ramp.

To apply for Metro Plus paratransit service, the prospective rider must complete a self-certification application form, which is available from the Customer Service Department at LANTA. Applications also may be downloaded from LANTA's website ([www.lantabus-pa.gov](http://www.lantabus-pa.gov)). Applications are also available in various accessible formats: Braille, audio, large print and online in Word and PDF format. Applications are also available in Spanish. Although the application indicates that it may be submitted online, staff and the Customer Ride Guide state that applications must be signed and returned with an original signature. No faxes or e-mails are accepted. A copy of the Metro Plus application package is included in Attachment F.

The same application form is used to apply for both the ADA and Shared Ride programs. A separate application is required for individuals seeking eligibility for the PwD Program; DPW identifies customers who are eligible for MATP-funded service.

The application form includes three parts.

- **Part 1 – General Information/Applicant Certification**

This section must be completed by applicants or by their representative. In addition to basic questions about the applicant, this section asks applicants: to identify how far they live from a Metro bus stop; to describe the nature of their "physical or mental" disability that prevents them from using fixed route service; whether they have an ACCESS or Managed Care card from DPW; which mobility aid they use; information about potential obstacles at the entrance to their home, for example, steps, steep hills, narrow street, broken sidewalk; and which entrance to use

for pickups. The applicant must answer all questions in this part and the applicant or preparer must sign the applications.

- **Part 2 – Proof of Age**

Applicants are asked to provide proof of age by providing a photocopy of one of eight documents. The intent of this section is to document eligibility for the Shared Ride Program. Applicants younger than 65 are considered for ADA eligibility; applicants 65 or older are considered for Shared Ride Program eligibility. According to LANTA staff, when a person becomes 65 years old, eligibility shifts from ADA to Shared Ride to reflect funding eligibility under the Shared Ride Program.

- **Part 3 – Professional Verification**

According to the instructions, this section must be completed by a physician who is familiar with the applicant's disability. The instructions to the physician who verifies the applicant's disability state:

Federal law requires that those whose physical or mental impairment prevents them from using available fixed route Metro bus services, be provided with an alternative, door-to-door, transportation service. Distance and 'inconvenience' are not the basis of eligibility but, rather, the person's functional inability to use regular transit services. The information you provide will allow us to make an appropriate evaluation of this request and its application to specific trip requests. Thank you for your cooperation in this matter.

The application requests information about the "condition/diagnosis that prevents the applicant from using the regular LANTA/Metro city bus system." For individuals with vision impairments or blindness, the professional verification also asks for visual acuity and visual fields for each eye, which may not provide enough information about a person's inability to use fixed route transit. Finally, for applicants with a cognitive disability, the physician is asked to indicate whether the applicant is able to give telephone numbers or addresses, recognize destinations or landmarks, manage unexpected situations, ask for and follow directions, and travel through crowded/complex facilities.

The professional verification section of the application asks for information about the applicant's ability to travel various distances, 200 feet, 1/4-mile, and 3/4-mile "without assistance." The phrase "without assistance" may be misleading to the professional who may be unfamiliar with the DOT ADA regulation. According to § 37.123 and explained in more detail in Appendix D, LANTA should assess a person's ability to travel independently without the assistance of another person (except the operator of a wheelchair lift), rather than his or her ability to travel without any assistance. At the time of the review, LANTA was not requiring in-person interviews or functional assessments. In the past, LANTA had used a local agency to perform the Functional Assessment of Community Transit Skills (FACTS) test for applicants with cognitive disabilities. However, the person who performed the FACTS test left the local agency and at the time of the review, the position had not been filled.

Per § 37.125(c) of the DOT ADA regulations, LANTA requires staff to complete the application review and notification process within 21 days of receiving a completed application. LANTA considers the application to be complete when all information is provided, including physician verification. Incomplete applications are returned to the applicant. If Metro Plus has not made a

determination of eligibility within 21 days following the receipt of a completed application, the applicant is treated as eligible on the 22nd day is provided service until and unless the individual is determined to be ineligible for paratransit service.

## Recertification Process

According to LANTA, all Metro Plus paratransit customers may be required to recertify at reasonable intervals. A recertification packet is mailed “well in advance in order to allow maximum time for the process.” As of the date of the on-site visit, there had never been a recertification and only those riders with temporary eligibility were given an expiration date for eligibility for Metro Plus. At the time of the review, LANTA had 23,153 registered customers including all categories in its database, which dates back to 1984. Approximately 4,100 individuals have used Metro Plus this year; typically about 40 percent of trips are for ADA paratransit customers. In 2008 LANTA began to review its database and stated that it planned to deactivate anyone who has not used the service since 2007. LANTA stated that this deactivation would not preclude a rider from being reinstated to receive service, if needed.

LANTA is not permitted to terminate eligibility to ADA complementary paratransit eligible riders based on use/non-use of the system. As explained in Appendix D of the DOT ADA regulations at § 37.125, once LANTA certifies a rider as eligible for ADA complementary paratransit, the individual’s eligibility takes on the coloration of a property right. Before eligibility can be removed “for cause,” LANTA must provide due process to the individual. Use or non-use of the system is not a justification for removing an eligible rider from LANTA’s database. LANTA is permitted to ask applicants to recertify eligibility for Metro Plus service and establish reasonable expiration dates for eligibility at that time.

## Types of Eligibility Granted

According to the Metro Plus Ride Guide, eligibility determinations are made in three categories:

**Category 1:** Category 1 consists of persons who are unable to board, ride, or disembark from the bus even if they are able to get to the stop and the bus is accessible. Persons in this category include individuals with mental or visual impairments who cannot navigate the bus system. Examples of navigating the system include recognizing destinations and understanding the transfer process.

**Category 2:** Category 2 consists of persons who cannot use buses without wheelchair lifts or other accommodations. These persons are eligible for paratransit service if accessible buses are not available on the fixed route on which they want to travel.

**Category 3:** Category 3 consists of persons with specific impairment-related conditions who cannot travel to a bus stop or from a bus stop to their final destination. The specific impairment-related condition must prevent the person from using regular, fixed route transit. A person is eligible if traveling to and from a bus stop is impossible when architectural and/or environmental barriers are combined with the specific impairment-related condition.

The above language is not consistent with the DOT ADA regulations (i.e. use of the word “impossible” in Category 3). The Ride Guide should conform this language to the regulations, and the regulatory definitions should be used in determining eligibility.

Temporary eligibility may be provided to individuals for the duration of their disability. Eligible visitors are also provided ADA eligibility for up to 21 days a year, as required § 37.127 of the DOT ADA regulations. The Ride Guide requires visitors to the Metro Plus service area to be certified for complementary paratransit by another transit system and to present proof of eligibility such as an identification card or letter from another transit system confirming their eligibility.

As described in the Metro Plus Customer Ride Guide, eligibility is determined either as “conditional” or “unconditional.” An individual with “conditional eligibility” is one who is approved for some trips or under certain conditions. An individual with “unconditional eligibility” is one who is approved for all trips. At the time of the site visit, staff stated that conditional eligibility was not typically considered when booking rides.

According to LANTA staff, eligibility determinations are primarily based on the professional verification section of the application. Requiring a physician to complete the professional verification may in fact not provide the relevant information required to make an eligibility determination based on the person’s functional ability to use fixed route transit services. Other transit agencies have found that receiving professional verification from occupational therapists, physical therapists, orientation and mobility instructors, and other health care professionals who are aware of a person’s functional abilities may be more appropriate than from a physician alone whose expertise may lie with the diagnosis and treatment of diseases. Completion of this portion of the form could require applicants to make an appointment and pay for a doctor’s visit. This requirement could therefore be construed as a prohibited fee or undue administrative burden on applicants.

## Eligibility Determination Letters

The DOT ADA regulations state that determinations of eligibility must be in writing and if applicants are found to be ineligible or if conditions are placed on an applicant’s eligibility, the determination must state the specific reasons for the decision (49 CFR 37.125(d)). Appendix D to the regulations clarifies that these reasons cannot be a simple recital that the person has been found to be able to use fixed route service. Determinations that deny eligibility or limit eligibility must also be accompanied by information about the process for appealing the decision.

Sections 37.125 (d) and (e) of the DOT ADA regulations require that letters of determination include the following five points of information:

1. Name of the eligible individual
2. Name of the transit provider
3. Telephone number of the entity’s paratransit coordinator
4. Expiration date for eligibility
5. Any conditions or limitations on the individual’s eligibility, including the use of a PCA

This section also requires that determinations of eligibility be in writing, and if applicants are found to be ineligible, the determination must state the specific reasons for the decision. Appendix D to the regulations explains that these reasons cannot be a simple recital that the person has been found to be able to use fixed route service. Decisions that deny or limit eligibility also must include information about the process for appealing the decision.

The review team reviewed samples of all types of eligibility determination letters used by LANTA. This included copies of letters granting full (unconditional) eligibility, conditional eligibility, and temporary eligibility as well as letters denying eligibility

LANTA records the date the completed application was received, along with the date an eligibility determination was made. Determinations are noted on the application forms and entered into the customer eligibility database.

If an application is approved, the applicant will receive a wallet-sized Metro Plus ID Card, which includes the following information:

- Name of the eligible individual and the unique ID number
- Metro Plus telephone number
- Expiration date for determinations of temporary eligibility
- Conditions, including the use of a Personal Care Attendant (PCA)

The eligible individual must sign the ID card in the space provided.

If the application is denied, the applicant receives a written determination, . Instructions on filing an appeal are included. are

## Reported Determination Outcomes

According to LANTA staff, nearly all applications are approved for either the ADA paratransit or Shared Ride Program. It was impossible for the review team to verify this at the time of the site visit because the staff did not log Metro Plus applications or keep statistics on the number of applicants granted or denied eligibility for the various programs. For billing purposes, anyone eligible for Metro Plus who is 65 or older is automatically entered into the database as being eligible for the Shared Ride Program rather than ADA paratransit. Except for the age component, the eligibility requirements for the two programs are the same, and the Lottery program will pay 85 percent of the trip cost for eligible individuals who are 65 or older. Some applicants residing in the rural part of the service area are also referred to the PwD and/or MATP programs, as they may be eligible for the PwD Program and/or for free medical transportation through MATP. However, this practice is inconsistent with the process requirements of §§ 37.121, 37.123 and 37.125 of the DOT ADA regulations. Billing a ride to another program is acceptable if the service is identical to that provided under Metro Plus complementary paratransit. However, a person's ADA eligibility must be established and preserved regardless of age, and the process must comply with the ADA regulations in all respects regardless of the person's age or eligibility for other programs.

## 6.2 Observations

### Process Observations and Reviews of Determinations

A review team member examined the 33 applications for ADA paratransit eligibility from February 2009. The 33 applications were identified by looking through all applications submitted, many of which were for the Shared Ride Program or MATP, since LANTA files all applications for Metro Plus eligibility together.



All of the 33 applications reviewed resulted in determinations of unconditional eligibility for the applicant. The LANTA supervisor responsible for reviewing the applications said she relies on the physician’s professional verification section. She indicated that it would be helpful if the questions solicited more information about physical abilities and more details in general, including a category for “sometimes” as a response to a question. Although determinations of conditional eligibility are permitted under the DOT ADA regulations, at the time of the site visit, LANTA did not enforce conditional eligibility. The Metro Plus rider database in use at the time of the site visit did not include sufficient information on each rider’s functional abilities for a call-taker or scheduler to determine if a rider could use fixed route service for a given trip, should LANTA choose to impose conditions in the future.

A review team member also reviewed sample letters of determination provided by LANTA. The letters included determinations for unconditional eligibility, temporary eligibility, and denials. As stated above, at the time of the site visit, conditional eligibility was not used. Each of LANTA’s sample determination letters and the ADA Paratransit ID card were reviewed for the elements required by §37.125 of the DOT ADA regulations. The results are summarized in Table 6.2. While the sample letters follow a general template as shown in Attachment G, they revealed inconsistencies in statements of eligibility determinations including conflicting wording on residence, service area information concerning the availability of ADA paratransit service.

A review of the sample determination letters indicated that while some riders were determined ADA eligible, one letter stated:

Metro Plus is obligated to provide transportation to ADA eligible individuals who reside within **3/4** of a mile of a LANTA Metro fixed bus route.

The ADA regulations require that service be provided for eligible trips within the ADA service area, irrespective of a rider’s residence. Section 37.131(a) states:

The entity shall provide complementary paratransit service to origins and destinations within corridors within a width of three fourths of a mile on each side of each fixed route. The corridor shall include an area within a three fourths of a mile radius at the ends of each fixed route.

Applicants residing outside of the service area should be notified in their determination letters that they will need to bring themselves into the Metro Plus service area for the trip to be an eligible trip. The reverse would be true for the return trip.

There also was an inconsistent level of detail provided in denial letters. Variations were found in all of the letters reviewed. Two examples of these inconsistencies are described below Table 6.2.

**Table 6.2 – Eligibility Determination Letters and Metro Plus ID Card:  
Inclusion of Required Elements**

Type of Letter	Individual's Name	Transit Provider Name	Paratransit Coordinator's Phone Number	Eligibility Expiration Date	Any Conditions or Limitations on Eligibility	Information about Appeal Process
Unconditional eligibility	NA	NA	NA	NA	NA	NA
Conditional eligibility	Yes	Yes	Yes	Not Stated	Sometimes +	
Temporary eligibility	Yes	Yes	Yes	Yes	Yes	Yes
Not eligible	Yes	NA	NA	NA	Sometimes +	Yes
ID Card	Yes	Yes	Yes	No*	Yes	NA

NA: not applicable+:

+ : Sometimes: some of the letters examined by the review team did not contain the necessary information

\*: Yes on temporary ID card

In a letter dated February 2, 2009 denying eligibility to an applicant, the following rationale was given:

... based on the information supplied by your doctor [that] you do not have a physical or cognitive disability that would prevent you from using the LANTA Metro fixed route bus system... According to our research, you reside less than 150 feet from a LANTA Metro fixed bus route, which would be the D Route, and according to your doctor you are able to walk that distance.

Section 37.125(d) of the DOT ADA regulations states that eligibility determinations must be in writing, and if an applicant is found to be ineligible, the determination must state the specific reason(s) for the decision. Appendix D to Part 37 explains that these reasons cannot be a mere recitation that the applicant can use fixed route service. The statement, “based on the information supplied by your doctor you do not have a physical or cognitive disability that would prevent you from using the LANTA Metro fixed route bus system,” is an example of such a recitation which is not permitted under the DOT ADA regulations.

Eligibility determinations should be based on an individual’s functional ability to use fixed route service rather than his proximity to a bus stop. Eligibility determinations must consider an applicant’s ability to travel to any origin and destination within the service area. Not all trips that the individual desires to make will begin at home, and the environmental conditions around each fixed route stop that might interact with a rider’s disability to prevent fixed route use (existence of curb cuts, terrain, or accessibility of intersections, for example) are not necessarily identical to those around the stop that is closest to the individual’s home.

LANTA should consider implementing conditional eligibility for Metro Plus ADA service. If conditional eligibility was part of LANTA’s process for determining eligibility for Metro Plus,

and if conditional eligibility were appropriately applied, it would be the appropriate determination for those applicants who are able to use fixed route for some but not all trips as the determination for the rider's overall eligibility. Specific trips for these riders would be eligible when the distance to or from a bus stop for a particular trip is greater than the number of blocks that the person can reasonably and consistently travel.

If LANTA does not adopt a policy of granting conditional eligibility to those riders who appear to be candidates for temporary eligibility or conditional eligibility it must grant full or unconditional eligibility to such individuals, rather than deny them eligibility for ADA paratransit service.

Basing the eligibility determination on the distance between the applicant's home and the nearest bus stop is not appropriate as not all of the applicant's trips will begin at home. LANTA's determination must consider the applicant's ability to travel between all origins and destinations within the service area, and recognize that conditions between the applicant's home and the nearest bus stop will not be the same at all points throughout the service area.

The distance to the bus stop is only one of many factors that may affect an applicant's functional ability to reasonably and consistently use fixed route service independently. Applications should be reviewed to determine what these other factors may be, and ensure that they are taken into account when evaluating the applicant's eligibility. In many cases, it would be appropriate to find an applicant conditionally eligible where these factors exist; if conditional eligibility is not used, the applicant would be unconditionally eligible for complementary paratransit. Finding an applicant ineligible under these circumstances would effectively deny service under those circumstances where it would be required. Proximity of a bus route should only be considered as part of trip by trip eligibility determinations where the applicant has received a determination of conditional eligibility. Proximity to a bus stop is not a valid justification, on its own to deny eligibility for Metro Plus service.

Similarly, a letter dated March 9, 2009, states:

It has been determined that you are not ADA eligible for public transportation services in accord with the ADA. This determination was based on the information supplied by your doctor on the application. Even if you were determined to be ADA eligible the subsidized door-to-door van service still could not be extended to you because you reside outside of the Metro Plus ADA service area.

This letter included notification of eligibility for the county-wide MATP-funded service. . This conflicting information could be confusing to an applicant.

LANTA cannot grant or deny eligibility for ADA complementary paratransit services based on an applicant's address. The letter quoted above does not specify the reason(s) why service has been denied. As stated above, 49 CFR 37.125(d) of the DOT ADA regulations it states that determinations of eligibility must be in writing, and if applicants are found to be ineligible, the determination must state the specific reasons for the finding. Appendix D to Part 37 explains that these reasons cannot merely state that the person has been found to be able to use fixed route service. An applicant's home address is not a criterion for eligibility.

Based on the available documentation, it appears that LANTA does not clearly notify customers about their eligibility status as required by the DOT ADA regulations. More specificity is needed when applications are denied.

## Review of Application Processing Times

Section 37.125(c) of the DOT ADA regulations requires public entities to make a determination of ADA paratransit eligibility within 21 days of the receipt of a completed application, or treat the applicant as eligible and provide service on the 22<sup>nd</sup> day and thereafter until the eligibility determination is made.

LANTA Metro Plus staff uses the application form itself to record and track steps in the eligibility determination process and the dates on which they occur. The application form includes lines for the following dates:

- Original submission date if different from the receipt date of complete application
- Application received with professional verification, at which point LANTA considered the application complete
- Determination date/letter sent (same day)

To assess the timeliness of eligibility determinations, the review team selected a sample of 33 applications received by Metro Plus from January through April 2009. The average time to process completed applications was 3.8 days, ranging from same-day processing to 16 days. The following dates, noted on each application, were recorded by the reviewer:

- Date that a completed application was received, including a completed professional verification form
- Date of eligibility decision/notification

The date of the eligibility decision was then compared to the receipt date of the completed application to determine the time taken to make each determination and inform the applicant.

Table 6.3 shows the elapsed time between the receipt of the completed application and the eligibility determination/notification date for each of the 33 applications reviewed. All of the applications reviewed were notified of their eligibility determination within 21 days of Metro Plus receiving a complete application. The review team found that processing time for those 33 applications ranged from zero days (i.e., the eligibility determination was made on the day that the application was received) to 16 days. As shown in the table, 85 percent of decisions were made within seven days, 97 percent within 14 days and 100 percent within 21 days.

**Table 6.3 – Time to Notification for 33 Randomly Selected ADA Paratransit Determinations Made January to April 2009**

<b># of Days Required to Make Determination and Send Notification Letter</b>	<b># of Determinations</b>	<b>Cumulative %</b>
7 days or fewer	28	85%
8 to 14 days	4	97%
15 to 21 days	1	100%
<b>Subtotal 21 days or less</b>	<b>33</b>	<b>100%</b>

Metro Plus does not record the dates of key milestones in the eligibility determination process in a spreadsheet or written log, so that tracking processing time requires looking at the dates recorded on each individual application.

The same application is used for the Shared Ride Program and Metro Plus and the programs operate under the same policies and procedures. For invoicing purposes LANTA automatically and unilaterally records anyone 65 or older who is eligible for Metro Plus as a Shared Ride customer. This is done without considering that the applicant may also be eligible for ADA paratransit. LANTA's justification for this practice is that designating an applicant as a Shared Ride customer allows older adults to travel throughout a larger service area than the ADA paratransit service area, while affording them the same level of service with respect to the other ADA complementary paratransit service criteria as ADA eligible customers. All trips are provided under the same operating policies and service standards, regardless of funding source. At the time of the site visit, LANTA stated that for this reason this practice has not resulted in discrimination against customers who would also be ADA-eligible. However, LANTA found it difficult to track ADA eligibility for customers who are included in the Shared Ride program. This makes complementary paratransit records incomplete and opens the possibility that future changes in program policies and practices could result in ADA-eligible persons enrolled in these other programs from receiving treatment and service as required by the ADA. Therefore it appears that LANTA does not conform to the process requirements of § 37.125. Billing a ride to another program is acceptable if the service is identical to that provided under Metro Plus complementary paratransit, but a person's ADA eligibility must be established and preserved regardless of age, and the process must be fully in conformance with the ADA regulations regardless of the person's age or eligibility for other programs.

## Appeal Process

Section 137.125(g) of the DOT ADA regulations contains the requirements for administering the eligibility appeals process through which individuals who are denied eligibility can obtain review of the denial. The transit system is permitted to require that an appeal be filed within 60 days of the denial of an individual's application. The appeals process must include an opportunity for the applicant to be heard and to present information and arguments. The decision on the appeal must be made by a person not involved with the initial decision to deny eligibility, must be communicated in writing and must explain the reasons for the decision. During the pendency of the appeal, the transit system is not required to provide paratransit service to the applicant. However, if a decision is not made within 30 days of the completion of the appeal process, the applicant must be provided paratransit service from that time until and unless a decision to deny the appeal is issued. As described in the Metro Plus Customer Ride Guide:

If the decision is made to deny eligibility, a letter of denial is sent to the applicant. This notice will include the reasons for denial and the procedure which may be used to appeal the decision. An applicant who wishes to appeal a decision of non-eligibility has sixty (60) days to make a written request to the LANTA Executive Director. Metro Plus will respond within thirty (30) days. The administrative appeals process will include a hearing where the applicant can be heard and present information and arguments. The Appeals Board conducting this hearing will be made up of three (3) persons not involved in the initial decision to deny eligibility. One member will be from LANTA Metro Plus and one from the Lehigh Valley Center for Independent

Living and a third person, mutually agreed upon by the first two. The third will be a person from the community who are knowledgeable about disabilities and the ADA.

The Appeals Board decision shall be issued to the individual in the appropriate accessible format and shall include reasons for the decision. Metro Plus will not provide service to individuals who are pursuing an appeal.

However, if the Appeals Board has not made a decision within thirty (30) days after the hearing, temporary service will be provided. This temporary service will continue until a decision on the appeal is reached.

In reviewing a sample of the letters the review team noticed that denial letters from 2009 contained information about the appeal process and some details about why a person was denied service, but earlier letters did not typically include this information. At the same time, the appeal process documentation states:

If you wish to appeal a decision about ineligibility you must do so within 60 days of the postmark on the notification of ineligibility. The appeal must be in writing from your physician, must be on the physician's stationery and must be signed by the physician.

Following the hearing, Metro Plus notifies the applicant in writing of the decision of the Appeals Board regarding the appeal.

The two-step appeals process and requiring that the applicant include a letter from the physician regarding the basis of the appeal may discourage applicants from exercising the right to appeal.

Information on appeals requested and conducted is kept in each customer's application file; however, no separate record or log of appeals is kept. LANTA staff indicated that eligibility appeals generally end at the first level of appeal, which is a letter written to the Executive Director. In these instances a customer's eligibility has been questioned on the basis of their ability to use the system by LANTA's Metro Plus eligibility staff. The appeal is in the form of a written confirmation by a physician that the individual is indeed prevented from using the fixed route services due to a disability and is ADA eligible. The written confirmation is reviewed by the Executive Director who renders a decision on the applicant's eligibility. Metro Plus staff estimates that there are some 40 appeals each year and that these appeals have all been successful, based on additional information provided. LANTA stated that since the ADA complementary paratransit program was initiated in 1992 that one appeal went beyond the first appeals stage to the full Appeals Board. The appeal was heard in 2002, and was denied based on the information provided by the applicant's family.

LANTA's public information, determination letters, and appeals process information needs to be revised to conform with all the required elements of § 37,125(d), (g), and (h) of the DOT ADA regulations and to remove references to bus stop proximity and the impossibility of fixed route travel, correct inconsistencies, and accurately reflect that an applicant's ADA paratransit eligibility is not based on residency within the service area.

Based on the documentation in use at the time of the review team at the time of the site visit, it appears that LANTA's appeal process did not include a provision to permit the applicant to waive the hearing and proceed on the basis of the written record.

The appeal process involves the Executive Director, which is inconsistent with the requirement in § 37.125 of the DOT ADA Regulations for a separation of function. The regulations and Appendix D explanation makes it clear that the persons who made the decision being appealed their supervisors and subordinates should not participate in the appeal process.

## No-Show Suspension Policy

Section 37.125(h) of the DOT ADA regulations states that transit agencies “may establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit service to ADA eligible individuals who establish a pattern or practice of missing scheduled trips.” FTA has permitted transit systems to regard late cancellations as no-shows if and only if they have the same operational effect on the system as a no-show, generally less than 1–2 hours of the scheduled trip time.

As specified in §37.125(h)(1), trips missed by riders for reasons beyond their control, including trips missed due to operator or transit system error, cannot be a basis for determining that such a pattern or practice exists. Appendix D to this section describes a “pattern or practice” as involving “intentional, repeated or regular actions, not isolated, accidental or singular incidents.”

As described in Section 3, the Metro Plus Customer Ride Guide states that a “no-show” is recorded when a customer books a trip and when the van arrives the customer is not available for travel or waves the driver on. The van driver will wait 5 minutes past the scheduled pickup window. No-shows do not include trips that are missed for reasons that are beyond the customer’s control such as scheduling problems, late pickups, and other operational problems. While LANTA’s no-show policy correctly states that a customer is not assessed for a no-show if the circumstances are beyond the rider’s control, all of the examples given relate to service issues related to Metro Plus, such as late trips and scheduling errors. The list does not include other example of circumstances beyond the rider’s control (e.g., illness, a sudden turn for the worse in a variable condition, a sudden family emergency, hospitalization of the rider or other circumstances beyond the rider’s control). As explained in Appendix D to the DOT ADA regulations, such circumstances do not form part of a sanctionable pattern or practice.

The Metro Plus Customer Ride Guide (Attachment D) contains the following information:

**Three or more no shows in a one month period:** The driver will place a no show notice at the customer’s door. If this is not possible, a no show notice will be mailed to the customer.

**In the following month: First no show:** The driver will place a no show notice at the customer’s door (a “door hanger”) if possible. If this is not possible, a no show notice will be mailed to the customer. **Second no show:** Driver will again place a no-show notice on the customer’s door. The customer will be contacted by certified mail that, based on their no show activity, transportation privileges will be suspended for 30 consecutive days if there is another occurrence. **Third no show:** Metro Plus will contact the customer in writing advising them that their transportation privileges are suspended for 30 consecutive days. **There are subsequent consequences if the pattern of no-shows occurs within each 90 days of each suspension. Subsequent Consequences:**

1. Customers who appear three or more times in one month on the no-show report, will be sent a warning letter and contacted by telephone to determine what is causing the no show activity.
2. Customers who appear three or more times each month for two consecutive months on the no-show report, will be sent a certified letter and contacted by telephone to notifying them that their transportation privileges will be suspended for 30 days upon the next no-show.
3. Customers who, after receipt of the certified warning letter, commit another no-show, will automatically have their travel privileges suspended for 30-days effective the day after the occurrence of the no-show. Notice of suspension will be sent by certified mail and telephone contact will be attempted.
4. If, after steps 1, 2 and 3 are followed, step 1 is repeated, services will be suspended for a period of 90 days. Notice of this will be included in a certified letter and through a telephone call.
5. If, after steps 1, 2, 3, and 4 are followed, step 1 is repeated, services will be suspended for a period of one year. Communication of this will be done by certified letter and telephone. Once any period of suspension is ended, the customer may have service reinstated by calling the main office.

Metro Plus's service suspension policy is explained in the Customer Rider Guide:

The appeal process for suspension of service is the same as that used for eligibility determination denials. A customer who wishes to contest a decision to suspend services has sixty (60) days to file a written complaint with the ADA Coordinator. The individual making the appeal has the right to be heard in person and may be represented by an individual of their choice. The ADA Coordinator will make a complete investigation of the reason for suspension and will notify the customer of the decision to suspend in writing within ten (10) days of receiving the complaint. The written notice will include the procedures which may be utilized to appeal the decision.

Metro Plus shall provide the customer who has been notified of suspension an opportunity to be heard as well as to present written and oral information and arguments. Copies of all relevant Metro Plus documentation shall be made available to the customer. Additional witnesses shall be permitted to testify.

However, a customer may waive the hearing and proceed on the basis of a written presentation. If the customer does not respond to the written notice of suspension within thirty days, Metro Plus shall make a default finding and impose sanctions.

If there is a hearing, and the customer needs Metro Plus to attend the hearing, Metro Plus will provide this service. In cases of suspension of service for other than illegal, disruptive or safety issues, Metro Plus will not suspend service while the appeal is pending - suspension of service will not begin until the appeals process is complete. If a decision is not made within ninety (90) days of the completion of the appeal hearing, the individual appealing the suspension shall be granted service until a final decision has been reached.



The Rider Guide also states that “once any period of suspension is ended, service may be reinstated by the customer calling Metro Plus.”

During FY 2009, ending June 30, Metro Plus recorded 41,610 no-shows, which represents 6.5 percent of all requested trips (for all categories of riders). Another 22 percent of trip requests resulted in same-day cancellations. LANTA does not separate no-shows for the ADA complementary paratransit portion of Metro Plus service or include same-day cancellations in that calculation, so the percentage of no-shows for ADA paratransit may be somewhat smaller. LANTA staff indicated that suspensions are imposed infrequently and only the most egregious cases are pursued. At the time of the site visit, the dispatcher confirmed that the door hangers were not being placed on customers’ doors and no-show penalties were not imposed. The dispatcher stated that LANTA believes that most of the no-shows are related to participants in the Medical Assistance Transportation Program.

During the period from July through December 2008, Metro Plus recorded across all programs a relatively high no-show rate of about 6.3 percent, with another 21.7 percent of trip requests resulting in cancellations. In FY 2009 through March 2009, no-shows and cancellations across all programs are being recorded at about the same rate (6.3 and 22.0 percent, respectively). From the data provided, the review team was not able to determine how far in advance of the trip the cancellations occurred. However, the data suggests the need for LANTA to examine the cause of no-shows and improve its provision of next day service to attempt to reduce the no-show rate below 4 percent, which is closer to what FTA sees in other ADA paratransit compliance reviews. LANTA’s policies suggesting that customers make reservations two to three days in advance, which are discussed later in this report, could be causing eligible rider to make trip requests because they might need a trip and believe that if they wait until the day before, they will not get their requested trip.

At the time of the site visit, LANTA was not enforcing its no-show policy. If the policy were put into practice, LANTA’s consideration of only three no-shows in a one-month period could unreasonably limit service to ADA eligible customers. Appendix D to the DOT ADA regulations states that suspensions of eligibility for no-shows are intended to prevent “a pattern or practice of missing scheduled trips” to “deter or deal with chronic ‘no-shows.’” Appendix D also explains that “a pattern or practice involves intentional, repeated or regular actions, not isolated, accidental or singular incidents.”

There is no provision in the DOT ADA regulations automatic suspension of service for no-shows. According to §37.125(h)(2)-(3), the rider must be informed in writing of the effective date of the suspension, must be afforded administrative due process prior to the imposition of the suspension, including the opportunity to appeal. FTA topical guidance explains that 15 days is recommended as reasonable advance notice. When the suspension period is up, reinstatement must be automatic and the rider must not be required to call Metro Plus to be reinstated.

## 6.3 Findings

1. The paratransit application indicates that it may be submitted online but the staff and the Customer Ride Guide state that applications must be signed and returned with an original signature. No faxes or e-mails are accepted.
2. The Metro Plus Ride Guide states that ADA paratransit eligibility is based on whether an applicant’s home is located within the ADA service area. LANTA staff stated that they

understand that ADA paratransit eligibility cannot be based on the location of an applicant's home address, but this misinformation may lead some persons not to apply for eligibility. LANTA is responsible for ensuring that its Metro Plus ADA complementary paratransit service accepts and reviews applications from any person wishing to use the service, to meet its obligations as a fixed route provider under §§ 37.121(a) and (b) and § 37.123(a) and (b).

3. The application includes a professional verification section, which must be completed by a physician. LANTA does not allow other health care professionals—such as occupational therapists, physical therapists, and orientation and mobility specialists—to provide the professional verification. Completion of this portion of the form could require applicants to make an appointment and pay for a doctor's visit. This requirement could therefore be construed as a prohibited special charge or "user fee" under § 37.5(d) or a prohibited undue administrative burden on applicants under § 37.125 and as explained in Appendix D.
4. The professional verification section asks a number of detailed questions about the nature of the person's diagnosis, along with questions relating to people with physical or cognitive disabilities but only requests visual acuity and field of vision information for persons with vision impairments. This information may not provide enough information about a person's inability to use fixed route transit.
5. The professional verification section of the application asks for information about the applicant's ability to travel various distances "without assistance." This phrase may be misleading to a professional who is unfamiliar with the DOT ADA regulations. According to § 37.123 and explained in more detail in Appendix D, LANTA should assess a person's ability to travel independently without the assistance of another person (except the operator of a wheelchair lift), rather than his or her ability to travel without any assistance.
6. As of the time of the review team's site visit, LANTA never requested that its riders recertify for ADA paratransit eligibility. Furthermore, eligibility determinations had no expiration date, other than for riders certified for temporary disability.
7. In 2008 LANTA began to review its database and stated that it planned to deactivate anyone who has not used the service since 2007. LANTA is not permitted to terminate eligibility to ADA complementary paratransit eligible riders based on use/non-use of the system. As explained in Appendix D of the DOT ADA regulations at § 37.125, once LANTA certifies a rider as eligible for ADA complementary paratransit, the individual's eligibility takes on the coloration of a property right. Before eligibility can be removed "for cause," LANTA must provide due process to the individual. Use or non-use of the system is not a justification for removing an eligible rider from LANTA's database. LANTA is permitted to ask applicants to recertify eligibility for Metro Plus service and establish reasonable expiration dates for eligibility at that time.
8. The Metro Plus Customer Ride Guide indicates that LANTA makes a determination of conditional or unconditional eligibility. At the time of the site visit, LANTA granted conditional eligibility, but did not impose conditions on individual trip requests. The Metro Plus rider database in use at the time of the site visit did not include sufficient information on each rider's functional abilities for a call-taker or scheduler to determine if a rider could use fixed route service for a given trip, should LANTA choose to impose conditions in the future.

9. LANTA does not conduct in-person interviews or assessments as part of the eligibility determination process for Metro Plus. In-person interviews or assessments are usually necessary in order to implement a conditional eligibility determination process.
10. The information provided in the eligibility determination letters sent to applicants who have been denied ADA eligibility do not provide enough specificity about why an eligibility determination was made. This information is required by 49 CFR 37.125(d), which states that determinations of eligibility must be in writing, and if applicants are found to be ineligible, the determination must state the specific reasons for the finding. Appendix D to Part 37 explains that these reasons cannot merely state that the person has been found to be able to use fixed route service.
11. Certain eligibility determinations appear to link the applicant's home address or the distance from the applicant's home to the nearest bus stop as a factor in determining ADA eligibility. An applicant's home address should play no role in determining eligibility. Linking the eligibility determination to the distance between the applicant's home and the nearest bus stop is not appropriate because it does not consider the destination or transfer requirements that may not be navigable for the applicant. The wording in eligibility notification and appeals process information also appears to base ADA paratransit eligibility upon an applicant's address within the Metro Plus service area.
12. LANTA's public information on the eligibility process implies that fixed route travel must be impossible for the applicant. This must be changed, as it may discourage potentially eligible persons from applying for the service.
13. LANTA does not have a centralized log or database in which it tracks the processing of ADA paratransit applications, determination outcomes, appeals requests or outcomes, or suspension appeals or outcomes. All such information is recorded only on each individual application.
14. LANTA automatically enrolls any applicant who is 65 or older in the Shared Ride Program, and shifts persons with ADA eligibility to this program when they reach age 65; this does not conform to the process requirements of § 37.125. Billing a ride to another program is acceptable if the service is identical to that provided under Metro Plus complementary paratransit, but a person's ADA eligibility must be established and preserved regardless of age, and the process must be fully in conformance with the ADA regulations in all respects regardless of the person's age or eligibility for other programs.
15. The appeal process involves the Executive Director, which is inconsistent with the requirement in § 37.125 of the DOT ADA Regulations for a separation of function. The regulations and Appendix D explanation make it clear that the persons who made the decision being appealed their supervisors and subordinates should not participate in the appeal process.
16. LANTA requires that the applicant appealing a determination must include a letter from the physician regarding the basis of the appeal. The burdensome nature of this requirement and the two-step appeal process may discourage applicants from exercising the right to appeal.
17. LANTA's appeal process did not include a provision to permit the applicant to waive the hearing and proceed on the basis of the written record.

18. LANTA’s public information, determination letters, and appeals process information needs to be revised to conform with all the required elements of §§ 37,125(d), (g), and (h) of the DOT ADA regulations. LANTA must remove references to bus stop proximity and the impossibility of fixed route travel, correct inconsistencies, and accurately reflect that an applicant’s ADA paratransit eligibility is not based on residency within the service area.
19. LANTA’s written no-show policy indicates that riders are suspended when they no-show three times in a period of 30 days, with escalating suspensions if the practice continues. Although LANTA stated that it was not enforcing the no-show policy at the time of the review, a policy that considers three no-shows in a one-month period could unreasonably limit service to ADA eligible customers if put into practice. Appendix D of the DOT ADA regulations states that suspensions of eligibility for no-shows are intended to prevent “a pattern or practice of missing scheduled trips” to “deter or deal with chronic ‘no-shows.’” Appendix D also explains that “a pattern or practice involves intentional, repeated or regular actions, not isolated, accidental or singular incidents.”
20. While LANTA’s no-show policy correctly states that a customer is not assessed a no-show if the circumstances are beyond the rider’s control, all of the examples given relate to service issues related to Metro Plus, such as late trips or scheduling errors. The list should also include examples of excused no-shows on the rider’s side, such as illness, hospitalization, or other circumstances beyond the rider’s control.
21. The LANTA no-show policy includes a consequence where a customer may be “automatically” suspended from service for 30 days. Riders must receive 15 days’ notice of suspension and be notified the date the suspension will start.
22. LANTA policy states that when a customer’s suspension has ended that the customer must call to reinstate service. It is not the responsibility of the customer to call to reinstate service. LANTA is responsible for reinstating service to the customer.

## 6.4 Recommendations

1. Revise public information, eligibility determination letters and appeals process information to conform with all the required elements of §§ 37.123 (e) and 37.125(d), (g), and (h) of the DOT ADA regulations. Remove references to bus stop proximity and the impossibility of fixed route travel, correct inconsistencies, and accurately reflect that an applicant’s ADA paratransit eligibility is not based on residency within the service area. Applicants residing outside of the service area should be notified in their determination letters that will need to bring themselves into the Metro Plus service area for a trip to be eligible. The reverse would be true for the return trip. Resolve the discrepancy between the Metro Plus application and the Customer Ride Guide and state unambiguously whether or not applications may be submitted online or via e-mail.
2. Permit qualified health practitioners (e.g., physical therapists, orientation and mobility instructors) who have a good understanding of the applicant’s functional ability to verify an applicant’s inability to use fixed route transit services. Acceptance of verification from a broader group of professionals can reduce the potential cost and burden on applicants in applying for ADA complementary service eligibility. In any case, any costs that are associated with the application process should be paid by LANTA and not imposed on applicants.

3. Rephrase the questions in the eligibility application concerning an applicant's ability to travel independently (but with the assistance of a mobility aid, if needed, and with the assistance of the vehicle operator to operate the wheelchair lift), rather than his or her ability to travel without any assistance.
4. Revise the professional verification section of the application to seek additional information about an applicant's visual impairments.
5. Consider implementing a recertification process to update its database and ensure that customers' eligibility statuses are still accurately categorized in the database rather than unilaterally deactivating eligible riders.
6. When granting conditional eligibility to an applicant, identify those trips for which the individual would not be able to use fixed route service because of a disability. For example, an individual who cannot walk three blocks but would be able to use a fixed route bus if the distance to the stops at his or her origin and destination were less, could be eligible for paratransit service when the distance to or from a fixed route stop is three blocks or more.
7. When denying or limiting eligibility for ADA paratransit service or denying an appeal, provide the specific reasons for the decision—not merely that the applicant is able to use fixed route service, lives too close to a bus stop, or based on the doctor's verification in the letter to the applicant.
8. Begin using a centralized log to track information such as dates of key milestones in the eligibility determination process, appeals requested and conducted, and notices of suspensions of service by rider category in spreadsheets or written logs. This would make it easier to monitor eligibility application processing time, the number and type of eligibility determinations, and the incidence and resolution of appeals of eligibility determinations and suspensions of service.
9. Keep statistics on the number of applicants approved or denied eligibility for ADA complementary paratransit service as distinct from the other coordinated programs.
10. Revise the appeal process to include the option of waiving a hearing. Consider making letters from a physician optional. Revise the appeal process so that the Executive Director is not involved in appeals; decisions made should not involve any persons who made the decision being appealed, their supervisors or subordinates.
11. Revise the list of potential reasons for excused rider no-shows to include examples of acceptable justifications from the rider's side.
12. Implement a no-show/suspension policy that is consistent with the ADA regulations. Consider revising the no-show/ suspension policy to consider only an absolute number of a rider's no-shows within a given period, but also the percentage of no-shows relative to the total number and frequency of trips requested within that period. As a starting point, that percentage might be linked to the overall system average for no-shows on Metro Plus service and the number would be adjusted upward so as to clearly reflect a pattern or practice of no-shows for frequent trip takers so that regular riders are not unfairly penalized. Riders should be given 15 days written notice of suspensions, and should not be required to take action to be reinstated at the end of the suspension period.

13. In consultation with the disability community, define late cancellations that have the effect of a no-show. Incorporate the definition in an updated no-show/late cancellation policy.
14. Instruct staff to allow individuals to register for Metro Plus ADA service even if they are registered for other services, including but not limited to Shared Ride.
15. Cease directing individuals to the Shared Ride program simply because they are 65 years or older. LANTA should accept applications from these individuals to determine whether these individuals may be candidates for ADA complementary paratransit service.

## 7 Telephone Access

Telephone access for placing or changing trip reservations or for checking the status of a ride is an important part of ADA complementary paratransit operations. Experiencing significant telephone delays to place or confirm trip requests or to check on rides could discourage people from using the service and could therefore be considered a form of capacity constraint.

Section 37.131(b) of the DOT ADA regulations requires that service must be scheduled and provided at any requested time in response to a request for service made the previous day. For example, a rider should be able to make a reservation at 4:45 p.m. for a pickup at 8 a.m. the following morning. Requests must be accepted during normal business hours, even on days that the agency may not otherwise be providing service, such as trip requests taken on Sunday for a trip on the following Monday. In addition, the prohibition on capacity constraints contained in §37.131(f) prevents a transit system from establishing any operational pattern or practice that significantly limits the availability of service. This chapter summarizes the review team's observations of the telephone system used for placing, changing, or confirming trip reservations or checking on the status of a ride

The review included:

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

### 7.1 Customer Comments

The review team conducted telephone interviews prior to the site visit to gather customer input from riders, advocates and agency representatives. As described earlier in this report, one of the issues cited in the complaint filed with FTA was an inability to schedule service due to busy signals or long hold times. Two respondents recounted being on hold up to 10 minutes when calling to make a reservation. One of the agency representatives suggested that the phone tree system may be daunting for some customers. One respondent stated that the phone system advises callers as to how many other callers are on hold ahead of them.

### 7.2 Service Standards

LANTA has the following standard for telephone performance as stated in its response to FTA's information request: "The standard for telephone access, is that all calls will not be left on hold for more than 2 minutes and that will be achieved 90 percent of the time."

The use of the 2-minute criterion and 90 percent performance level is used by many ADA paratransit providers. However, the standard does not specify when it should be met, e.g., 15-minute or 30-minute intervals, nor does it indicate a maximum allowable hold time, e.g. 95 percent of calls should be answered within three minutes, and 99 percent of calls should be answered within five minutes. In addition, there is no standard for calls on hold longer than 2 minutes, such as a maximum percentage for hold times greater than 5 minutes.

Performance monitoring requires a clear definition of these parameters.

“Where’s my ride?” calls are received by the call center, unless the customer knows the extension for the dispatcher, so they are covered by the same performance standard.

### **7.3 Phone System Design and Staffing**

The DOT ADA regulations require that an agency accept trip requests made the day before the trip (§ 37.131(b)). Requests must be accepted during normal business hours, including days that the agency may not otherwise be providing service; for example trip requests taken on Sunday for a trip on the following Monday. Section 37.131(b) also allows transit agencies to negotiate pickup times up to one hour before or after the pickup time requested by riders.

The telephone and reservations system for Metro Plus complementary paratransit is operated by LANTA’s contractor, ECC. The telephone system is an Inter-Tel Call Center Suite with automatic call distribution to the staffed reservations lines.

The call center is staffed by five customer service representatives (CSRs) whose primary duty is entering and confirming Metro Plus reservations. One of the CSRs assigned full time to reservations is fluent in Spanish. The most recent reservations staff member was hired in March 2008. A sixth CSR answers customer service calls and takes reservation calls when needed t at times of high call volume. In addition to the CSRs, the Customer Service Supervisor, whose desk is in the call center, takes reservations calls when the call volume is high, and five other ECC office staff are available to take calls when needed.

The customer service and reservations line is open from 8 a.m. to 4:00 p.m. weekdays; at the time of the site visit reservations were not accepted on Saturdays, Sundays or holidays. Customer service calls received at other times are automatically routed to the dispatch office, which is staffed 24 hours a day. Customers call 610-253-8333 to book trips. This number is published in the Metro Plus Customer Ride Guide and on the LANTA website. The phone numbers for all customer service calls are 610-776-RIDE (voice) and 610-432-8505 (TDD).

Callers to the Metro Plus reservations number during operating hours are greeted with a recorded message and are then given the following options:

- English or Spanish

This is followed by two more options:

- 1 for Reservations
- 2 for Trip Cancellation

According to the information provided by LANTA in response to the FTA Notification Letter:

A CSR’s responsibility includes but is not limited to the handling of customer calls for booking a trip for service, fielding possible day of service calls that get forwarded to dispatch or scheduling departments depending on the callers need. Upon completion of scheduling process CSRs do call backs for all demand trips for the next day Our dispatch operation is 24 hours and when the CSR department closed is all calls are forwarded to dispatch during the off hours so that all calls are always answered.

The dispatcher’s telephone number is also provided in the Customer Ride Guide:



If you have a question about your trip on the day of the trip or while you are ‘in transit,’ please call 610-253-8333 Ext. 1027. This is the Easton Coach Dispatcher’s office and they will assist you.

The review team’s observations on the call back process are discussed in Chapter 8.

## 7.4 Telephone Performance

### Review Team Observations

Review team members observed operations in the reservations areas for several hours in the afternoon of Monday April 27 and the morning of Tuesday April 28. Collectively, they observed 47 calls resulting in 80 trip reservations. During the observations it did not appear that the reservations staff had more incoming calls than they were able to serve within the 2-minute standard.

### Performance Reports

At the time of the site visit, ECC used four reports available from the Inter-Tel Call Center Suite to monitor call volumes, average length of call, average wait times, number of abandoned calls, and other statistics for calls handled by the call center CSRs, the dispatchers, and the person who handles complaints and general information calls. However, these four reports did not include the distribution of calls waiting and hold times by length of time, which is provided by most call center systems used by ADA complementary paratransit systems of comparable size.

Consequently, it was not possible to directly compare actual phone system performance with LANTA’s performance goal, which is expressed as a percentage of calls with hold times exceeding 2 minutes. Instead, the review team analyzed the performance using the available downloadable call data.

The review team obtained three weeks of daily call data organized by 15-minute increments; these time increments are referred to as “periods.” The weeks analyzed were February 2 to 6, 2009, March 2 to 6, 2009, and March 30 to April 3, 2009. The available data included the following for each time period:

- number of calls received
- number of calls answered
- average talk time
- longest wait time
- average wait time

This data was used to develop two performance measures: the portion of the day in which the longest wait time exceeded 2 minutes, and the portion of the day in which the average wait time exceeded 2 minutes. Time periods with average wait times exceeding 2 minutes do not meet the LANTA performance goal. Approximately 50 percent of the calls exceeded the 2-minute criterion. Since an average wait time, in contrast to a median wait time, is based on the length of each call’s wait time there may be fewer than half of the calls with wait times in excess of the average. However, it is not possible to determine if the performance standard is met during periods in which the longest wait time exceeded 2 minutes unless the average wait time also

exceeded 2 minutes. Nonetheless, these two performance measures give some sense of the performance of the system.

Table 7.1 presents a summary of the call data for the weeks of February 2, March 2, and March 30, 2009. The call volume averaged 2,110 calls per week or about 422 calls per weekday. The data is organized into 15-minute intervals of which there are 34 per day or 170 per week. In the three weeks examined, 39 percent of these time periods had at least one call waiting for more than 2 minutes, and 18 percent of the time periods had at least one call waiting more than 3 minutes.

**Table 7.1 – Calls with Long Waits for Three Sample Weeks in February, March, and April 2009**

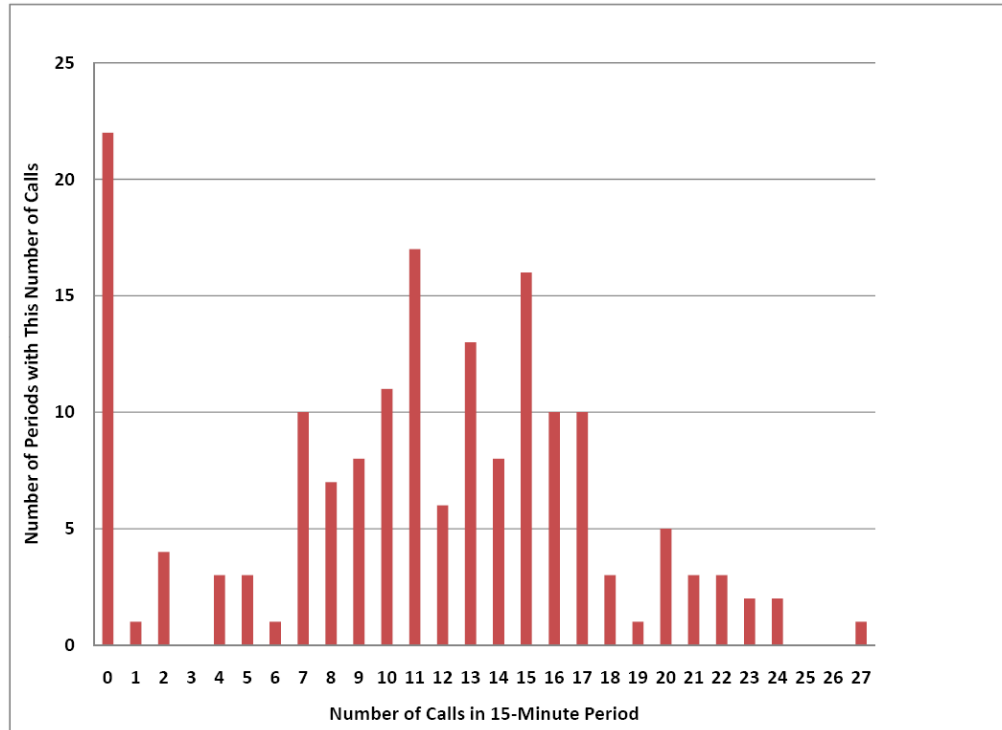
	Feb 2 - 6	Mar 2 - 6	Mar 30 - Apr 3	Weekly Average
<b>Total calls</b>	2,323	2,124	1,883	2,110
<b>Longest Wait &gt; 2 minutes</b>				
Periods with longest wait > 2 minutes	70	66	65	67
Percent of periods (170 each week)	41%	39%	38%	39%
Calls in periods with long waits	1,213	1,058	985	1,085
Percent of day weighted by number of calls	52%	50%	52%	51%
<b>Longest Wait &gt; 3 Minutes</b>				
Periods with longest wait > 3 minutes	23	36	33	31
Percent of periods	14%	21%	19%	18%
Calls in periods with long waits	439	607	482	509
Percent of day weighted by number of calls	19%	29%	26%	24%
<b>Average Wait &gt; 2 Minutes</b>				
Periods with average wait > 2 minutes	3	7	11	7
Percent of periods	9%	4%	6%	6%
Calls in periods with long waits	56	122	163	114
Percent of day weighted by number of calls	10%	6%	9%	8%
<b>Percent of Calls Not Answered</b>	2.0%	1.2%	1.1%	1.4%

Without a frequency distribution of wait times, it is not possible to apply LANTA’s service standard, but some inferences are possible. When the average wait in a given period is longer than 2 minutes, then roughly half the calls in that period exceed the standard. Based on assumptions about the distribution of the calls with long waits (presented in Attachment H), the review team then estimated that the percent of calls for the week with a wait longer than 2 minutes would be:

- 4 percent for the week of February 2
- 6 percent for the week of March 2
- 7 percent for the week of March 30

Data for the week of March 30 was analyzed in more detail. Figure 7.1 shows the frequency distribution of calls per 15-minute period. Only 10 percent of the week’s 170 15-minute time periods had more than 18 calls per period (columns at the right side of the figure). The LANTA call data indicated that, for 15-minute time periods when there were 14 or fewer calls, 23 percent

of the periods had calls that waited more than 2 minutes. For periods when there were 15 or more calls, 68 percent had calls that waited for more than 2 minutes. The periods with high call volumes occur throughout much of the day but are concentrated between 8 a.m. and 10 a.m. and between 2 and 4 p.m. In addition, since the CSRs were making call-backs in the late afternoon their availability to respond to incoming calls was reduced.



**Figure 7.1 – Calls per 15-minute period, week of March 30, 2009**

In terms of staffing, periods with 15 or fewer calls can normally be covered by five CSRs with a relatively low probability of long call waiting times. As the number of calls increases, the chance of a long wait also increases. Providing six CSRs dedicated to taking calls during the busiest hours of the day would substantially reduce the portion of calls that experience waits longer than 2 minutes. The review team’s analysis of calls waiting should be reviewed further with the aid of a frequency distribution report showing information on the portion of calls waiting more than 2 minutes. LANTA should be able to obtain such a report from the phone system with assistance from Inter-Tel.

## 7.5 Findings

1. LANTA has a telephone performance standard that states “all calls will not be left on hold for more than 2 minutes and that will be achieved 90 percent of the time.” However, the standard does not specify when the standard should be met, e.g., 15-minute, 30-minute intervals, nor does it indicate a maximum allowable hold time e.g. 95 percent of calls should be answered within three minutes, and 99 percent of calls should be answered within five minutes.
2. ECC does not directly monitor call answering performance against the LANTA standard.

3. Analysis of three weeks of incoming call data from the reports used by ECC at the time of the site visit found that 51 percent of calls are received during time periods when the longest wait exceeds 2 minutes and 24 percent are received during time periods when the longest wait exceeds 3 minutes. In 4 to 9 percent of the time periods in these three weeks, the average wait time exceeded 2 minutes. The portion of calls not answered ranged from 1 to 2 percent in the three weeks.
4. For 15-minute time periods when there were 14 or fewer calls, 23 percent of the periods had calls that waited more than 2 minutes; for periods when there were 15 or more calls, 68 percent had calls that waited for more than 2 minutes.
5. Based on the available downloadable call data, it is likely that the LANTA's performance standard is not being met on an hourly, daily, and possibly weekly basis.

## 7.6 Recommendations

1. LANTA should specify the time period for which it seeks to meet its call answering standard. This period should be 30 minutes or less.
2. LANTA should obtain a telephone report format from its telephone system vendor that shows the distribution of calls waiting and hold times by length of time; and that ECC can routinely use to directly monitor the portion of calls that meet the LANTA standard.
3. LANTA should monitor call answering performance. If performance is not meeting its standard consistently, LANTA should increase its call center staffing during periods of high call volumes.

## 8 Reservations

### 8.1 Trip Reservations Process

The response time provisions of § 37.131(b) of the DOT ADA regulations require the transit system to schedule and provide paratransit service to any ADA complementary paratransit eligible person at any requested time on a particular day in response to a request for service made the previous day. Reservations may be taken by reservation agents or by mechanical means and the transit system can use real-time scheduling in providing ADA complementary service. Section 37.131(b)(2) states the transit agency may negotiate pickup times with the rider but cannot require the rider to schedule a trip to begin more than one hour before or after the individual's desired departure time.

Section 37.131(b)(4) of the DOT ADA regulations also permit transit operators to accept paratransit reservations to be made up to 14 days in advance. Providing advance reservations is *optional*; providing next day service is *required*.

The DOT ADA regulations require that trip requests made the day before the trip must be accepted, scheduled, and provided (49 CFR § 37.131(b)). Requests must be accepted during normal business hours, including on those days that fixed route and ADA complementary paratransit service would otherwise not be provided, for example, trip requests taken on Sunday for a trip on the following Monday. Section 37.131(b) also allows transit agencies to negotiate pickup times with riders up to one hour before or after the pickup time requested by riders.

While the previous chapter addressed access to reservations, this chapter focuses on how LANTA handles trip requests.

The review team examined how Easton Coach (ECC), LANTA's contractor for Metro Plus, service handles trip requests from customers. Particular attention was given to policies and procedures regarding reservations, negotiation of requested trip times, and whether LANTA and ECC used any form of trip caps or waiting lists to determine whether there was a pattern or practice of denying a significant number of ADA eligible trip requests. The review team gathered and analyzed the following:

- Input from customers and advocates through telephone interviews and through a review of comments and complaints on file at FTA and LANTA
- Reservations policies and performance standards
- Service reports prepared by LANTA showing the number of trips served and the number of trips denied for the past three years
- Direct observations of the handling of trip requests

The Metro Plus Customer Ride Guide provides the following information about scheduling service:

Metro Plus provides 'next-day service.' This means that requests for trips for a particular day may be made any time during the preceding day. However, Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip. Customers may make ride reservations up to fourteen (14) days in advance.

Metro Plus provides more than 2,000 trips each day! The more flexible you are and the more advanced notice you give, the more likely your trip will be scheduled.

You may call to schedule your Metro Plus trip up to 14 days in advance, and you may call up to 4 p.m. the day before you'd like a ride. **There is NO same day service.**

To make a trip reservation, call Easton Coach at 610-253-8333 between 8:00 a.m. and 4:00 p.m., Monday through Friday.

The call taker will confirm your reservation. Due to the equipment availability, driving conditions, or destinations, trips may have to be rescheduled or, in rare cases, canceled. You will be notified of any changes as soon as possible.

The Metro Plus office is closed Saturdays, Sundays, New Year's Day, Easter Sunday, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

Because there is no provision for making a next-day reservation on Saturdays, Sundays or holidays, LANTA's policy is inconsistent with the response time requirement of the DOT ADA regulations at §37.131(b)(1). Trip requests made the day before the trip must be accepted, scheduled, and provided. LANTA must also accept requests during normal business hours, including on those days that fixed route and ADA complementary paratransit service would otherwise not be provided. Furthermore, statements such as "Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip" implies that there may be insufficient capacity to accommodate trip request made the previous day, which would discourage riders from attempting to schedule and use the service, which would also be a prohibited capacity constraint on ADA complementary paratransit service.

## 8.2 Customer Comments

In both the 2007 complaint filed with FTA and interviews in advance of the site visit, several customers complained about trip reservations. Two of the interviewees indicated that when they called the day before service they were sometimes told that three days' notice was needed. One of the agency representatives stated that getting rides scheduled before 9:30 a.m. and after 2 p.m. can be difficult.

Half of the customers interviewed said that when they call Metro Plus on the day of service to confirm, the requested pickup times have been changed by as much as 30 minutes. One customer with a subscription trip said that her confirmed scheduled time was sometimes changed. Several respondents also indicated that when booking a ride with an appointment time, they request an extra half hour in advance of the appointment to be sure they are on time (e.g. they tell the call-taker that they have a 9:30 a.m. appointment when it is really at 10 a.m.).

Most respondents indicated issues with "where's my ride" calls. The issues ranged from experiencing wait times of up to 10 minutes when requesting a will-call to unreliable estimates of time of arrival to rude dispatchers. One agency representative also stated that some drivers may call riders directly to rearrange pickup times.

### 8.3 LANTA’s ADA Standards, Policies and Procedures

LANTA provided the following policy statement:

It is the policy to accommodate all customers registered with the LANTA Metro Plus system, regardless of home location, distance traveled, or unique transportation needs.

All trips requested are accommodated as close to the customer’s preference of times, as possible, and shared ride concepts are employed to be efficient in the use of resources.

This policy does not explicitly address the DOT regulatory requirement to provide trips within one hour of the time requested. The Metro Plus Riders Guide makes the following statement

Metro Plus has peak demand similar to the regular city transit system. Therefore, when it is in the passengers’ discretion, it is advisable to make appointments and plan trips in the midday hours from 9 a.m. to 1:30 p.m.

These policies are not consistent with the hours and days service criteria of the DOT ADA regulations, and indicate that at the time of the review LANTA may have had difficulty providing service to all ADA eligible customers within one hour of the riders’ requested pickup times at all hours of the service day and that LANTA may have had difficulty scheduling and providing service to eligible riders so they could reach appointments. Customers must not be pressured or asked to schedule trips at off-peak times or dissuaded from making trip requests for peak hour appointments. Such written policies and reservation practices constitute capacity constraints that are prohibited under the DOT ADA regulations.

The Metro Plus Customer Ride Guide also states that “all requests for trips are accepted on a first-come, first-served basis. There are no ‘wait-lists’ – any trips that are booked are provided.”

The DOT ADA regulations require that trip requests can be made at any time on the day prior to the trip. The regulations allow advance reservations to be made up to 14 days before the requested trip date. The Metro Plus Customer Ride Guide makes the following statement:

Metro Plus provides “next-day service.” This means that requests for trips for a particular day may be made any time during the preceding day. However, Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip. Customers may make ride reservations up to fourteen (14) days in advance.

Therefore, the language in the Metro Plus Customer Ride Guide is inconsistent with the DOT ADA regulations, as it is unacceptable to pressure customers or suggest that they schedule a minimum of two to three days in advance. This issue is discussed below under Observations of the Handling of Trip Requests.

The DOT ADA regulations also require that it be possible for a customer to make a next-day reservation for any service day. This means that it must be possible to schedule a Monday trip on the Sunday before.

The Metro Plus call center accepts calls from 8 a.m. to 4 p.m. Monday through Friday. There is no provision for making reservations on Saturdays, Sundays, or holidays, although voicemail cancellations may be left after hours. Because there is no provision for making a next-day

reservation on Saturdays, Sundays or holidays, LANTA’s Metro Plus does not comply with the requirement to provide next day service.

At the time of the review Easton Coach used the TransView software system for reservations and scheduling. The reservations procedure for “going” trips is entirely appointment-based, so even shopping trips are scheduled based on the requested arrival time. Return trips are scheduled based on the requested pickup time. Each CSR entered information into TransView screens on her computer and also accessed the scheduling features to determine the most promising route for assigning the trip and estimating a tentative pickup time. After the scheduling process is finished for the following day, CSRs make call-backs to confirm the trips and their pickup times with the customers. (see Section 9.3 below),

When riders called to book a trip, CSRs typically followed the following process to book the first leg of the trip:

1. Entered the rider’s name into the trip-booking screen, which calls up the rider’s information from the client file.
2. Asked the rider where they wished to go and whether they were going from home.
3. For destinations that involve a specific arrival time, for example a medical appointment, requested the date and time of the destination appointment; and entered a drop-off time 15 minutes before the rider’s requested drop off time.
4. Requested the type of appointment if not clear from the context in order to select a billing code. At the time of the review, LANTA believed this policy was necessary because Metro Plus is a coordinated system providing trips under a variety of programs including Metro Plus ADA complementary paratransit. For example, if the rider data indicate that the customer is eligible for Medicaid transportation, that billing code is selected and will appear on the driver’s manifest to indicate that no fare is to be collected. The same ADA-eligible person scheduling the next leg of the trip to a shopping mall would result in a different billing code requiring an on-board fare for that leg of the trip.
5. For trips with a non-specific arrival time, for example, to shopping mall), asked the customer when they wished to arrive. In some cases the customer would ask for a specific pickup time, which the CSR would enter and allow the software to calculate the arrival time.
6. Entered the destination address by selecting a destination from a common locations file, or typing in the destination address if it was not already in the system.
7. Confirmed the origin address—usually by asking callers if they will be traveling from their home address which automatically populates the origin address field. Entered a different address if the origin was not the home address.
8. Requested and enter any special pickup or drop-off location instructions.
9. Asked whether the rider would be using a mobility aid during the trip.
10. Used a phrase like “Will you be going by yourself?” to determine if a PCA or companions would be accompanying the rider.
11. Used TransView to assign the trip to a route, which sometimes requires testing a number of alternative schedules, to determine the pickup time for the requested drop-off and to calculate the pickup time for the requested drop-off (or the drop-off time for a pickup-driven trip). The CSR would make a judgment whether the pickup time generated by



TransView would be reasonably close to the requested time; if so, the CSR would confirm the trip and tell the customer to expect a call-back with the exact pickup time; if not, the CSR would negotiate an alternate pickup time with the customer. If the software offered no suitable runs, the CSR would leave the trip unscheduled, and the trip would later be assigned by a scheduler or dispatcher. The CSR does not confirm the pickup time in all cases, but tells the customer that they will receive a call-back on the day before the trip with their final pickup time.

12. Confirmed the trip details (other than pickup time) with the caller.

In the cases in which TransView did not offer the CSR any runs that could meet the customer's request even with negotiation, the CSR left the trip in the system with the customer's requested pickup and drop-off times as an "UNS" (unscheduled) request to be manually scheduled later by schedulers or dispatchers. When this was done, the CSR confirmed the trip with the caller as if it had been scheduled at the time requested and told the customer that the pickup time would be provided in a call-back on the day before the trip.

In the batch scheduling process, ECC has set the scheduling window in TransView to 0 to +30 minutes for trips with a requested pickup time. For example, if the rider requested a pickup time of 5 p.m., then the allowable scheduled pickup time can range from 5 to 5:30 p.m. This practice is acceptable, provided that the caller may object to the time offered in the call-back and be transferred to a dispatcher who will attempt to adjust the time as requested by the rider. The practice of call backs is acceptable, provided that the rider's originally requested time is recorded and honored; that the rider has the opportunity to negotiate the offered pickup time if the requested time is not honored; that call backs happen neither too early nor too late to allow for negotiation if needed; and that the pickup time is not adjusted again without the rider's knowledge and consent after the call back.

To book the return or subsequent legs of trips, the CSRs typically followed this process:

1. Initiated scheduling of a return trip in the system, which automatically populates the new origin address with the prior destination address and the new destination address with the prior origin address.
2. Asked if the rider would be returning to the origin address. If not, changed the address in the return trip-booking screen.
3. Asked when the rider would like to be picked up for the return trip and entered this time into the requested time ("RT") field in the origin portion of the trip-booking screen.

Once this information was entered, CSRs used the system to search for scheduling options. If the system indicated that an option was available, the trip was scheduled. When all trip legs were booked, the CSR viewed a final trip summary screen and repeated the summary information back to the customer and verified the key information for each trip.

## 8.4 Review of Recorded Trip Denials

Under Section 37.131(b) of the DOT ADA regulations, the transit system may negotiate pickup times with a passenger, but cannot require the passenger to schedule a trip to begin more than one hour before or after his or her desired departure time. If the trip cannot be arranged within this timeframe and the passenger accepts a departure time of more than one hour earlier or later,

this still constitutes a denial of service and must be counted as a denial, whether the rider accepts the offer or not.

It is Metro Plus' policy to provide service for all eligible trip requests. From June 2008 through March 2009, Metro Plus reported a total of seven "unscheduled trips," i.e., denials. During this 10-month period there were 323,646 scheduled trips. This yields a denial rate of less than one per 46,000. LANTA was not able to determine whether the unscheduled trips were requested by ADA or non-ADA passengers. These unscheduled trips were recorded in October 2008 (2), November 2008 (1), December 2008 (2), and February 2009 (2).

## 8.5 Observations of the Handling of Trip Requests

On the afternoon of April 27 (Monday) and the morning of April 28, 2009 (Tuesday), review team members sat with CSRs to observe procedures and outcomes of trip request handling. They observed 32 calls that accounted for 80 trip requests; LANTA allows multiple reservations to be made per call. There were also 15 other calls received during the observations requesting cancellations, confirming trips, or asking where their ride was.

Trip requests on those days were mostly billed either to the ADA billing code (LAN) or to the Medical Assistance Transportation Program code (MAR). MATP is Medicaid transportation and these trips are free for eligible individuals based on income rather than disability status, so not all of these trips served ADA-eligible customers.

One step in the reservations procedure was to ask the rider about their destination so that the appropriate billing code could be entered. For example, if the rider's destination is for a medical appointment, and the rider's profile data indicates that they are eligible for Medicaid transportation, that billing code is selected and will appear on the driver's manifest to indicate that no fare is to be collected. The same ADA-eligible person scheduling the next leg of the trip to a shopping mall would result in a different billing code requiring an on-board fare for that leg of the trip.

At the time of the review, LANTA believed this policy was necessary because Metro Plus is a coordinated system providing trips under a variety of programs including Metro Plus ADA complementary paratransit. ECC explained that the trip purpose information was for billing purposes only and was never used to prioritize or restrict service. The review team found neither any evidence to indicate that prioritization or restriction of trips by purpose was occurring, nor any difference in the service provided to riders in different billing categories. In addition the availability of the Shared Ride and Medicaid transportation programs reduced the fare the riders eligible for these programs must pay. Therefore, this aspect of the reservations process is acceptable from the point of view of ADA so long as prioritization, restrictions, or different service quality do not occur in the future.

Nearly all of the trip requests observed by the review team were entered into the system at the times requested—except that drop-offs were entered in the requested time field 15 minutes before the time actually requested by the customer. In some cases the comment field was used to indicate the customer's actual appointment time. For return trips from appointments, the CSR generally asked the customer how long their appointment was expected to last and then added 15 minutes to the return trip pickup time. The review team did not observe the use of waiting lists or that CSRs told customers that there were any caps on the number of trips a passenger could reserve.

At the time of the review, the CSR used TransView to find an appropriate run for which to assign the rider's requested trips. Although the CSRs would use their judgment to verify that the pickup time was reasonable for a trip going to the customer's appointment, they knew that batch scheduling would likely change the pickup time to some extent, so the rider was given the approximate pickup time but told to expect a call-back on the evening before the day of the trip with the exact pick-up time.

Occasionally TransView did not provide the CSR with a scheduling option that they considered reasonable, for example a very early pickup time for an appointment, or a pickup for the return trip that was later than requested. In these cases the CSR would inform the customer and negotiate the trip times. None of the negotiations observed by the review team constituted a denial, meaning that none of the proposed times would require the rider to travel more than 60 minutes earlier or later than the rider wished to travel.

If TransView did not offer the CSR any runs that could meet the customer's request even with negotiation, the CSR left the trip in the system with the customer's requested pickup and drop-off times as an "UNS" (unscheduled) request to be manually scheduled later by schedulers or dispatchers. When this was done, the CSR confirmed the trip with the caller as if it had been scheduled at the time requested. As discussed above, The practice of call backs is acceptable, provided that the rider's originally requested time is recorded and honored; that the rider has the opportunity to negotiate the offered pickup time if the requested time is not honored; that call backs happen neither too early nor too late to allow for negotiation if needed and that after the call back, the pickup time is not adjusted again without the rider's knowledge and consent.

Not all CSRs consistently repeated the drop-off appointment time back to the customer.

The reservations staff appeared to be highly professional, skilled, and experienced in phone skills and use of the TransView software. One is fluent in Spanish. One had previously worked in dispatch.

At the time of the review, the most recent hire of a CSR was in May 2008. The call center supervisor stated that she trains each new CSR and informally monitors each person on her staff. A three-ring binder in the call center contains a script for reservations calls, although the supervisor indicated that it is not often used for reference. There had not been any need for refresher training for any of the call center staff, according to the supervisor.

The review team also observed CSRs taking calls that did not involve trip bookings. These included "Where's my ride?" calls, which were rolling from the dispatcher lines if they were on the phone, trip confirmation calls, trip cancellation calls, inquiries about eligibility, and queries about ADA as well as other paratransit service operated by ECC. CSRs forwarded these calls to the customer service line or placed the call on hold to check with dispatch on "Where's my ride?" calls and then returned to the caller to inform them of the trip's status. The review team observed 15 of these other types of calls during the observations, compared to 32 calls to make reservations. Other types of calls were generally very brief and represented a small percentage of the CSR's time.

During trip request calls, CSRs consistently confirmed:

- The days and dates of the trips
- Origin addresses and special pickup instructions

- Destination addresses
- Rider telephone numbers
- Appointment and pickup times
- Types of mobility aids used by riders
- Whether a PCA or guest was to accompany the customer

### Subscription Service

Section 37.133 of the DOT ADA regulations allows transit operators to provide subscription service (i.e., regularly recurring trips), subject to certain limitations. Subscription service trips may not absorb more than 50 percent of the available trips at any given time, unless there is non-subscription capacity.

LANTA uses the term “standing order” trips to refer to subscription trips. LANTA’s handling of these trips is discussed in Chapter 9.

### Advance Reservations

During the observation of reservations call, the CSRs were observed to remind customers making next day trip requests to try to make their reservation at least two or three days in advance as is requested in the Customer Ride Guide. Based on the 80 observed reservations, a frequency distribution was prepared showing the number of days before the requested appointment that the reservation was made. This information is presented in Figure 8.1.

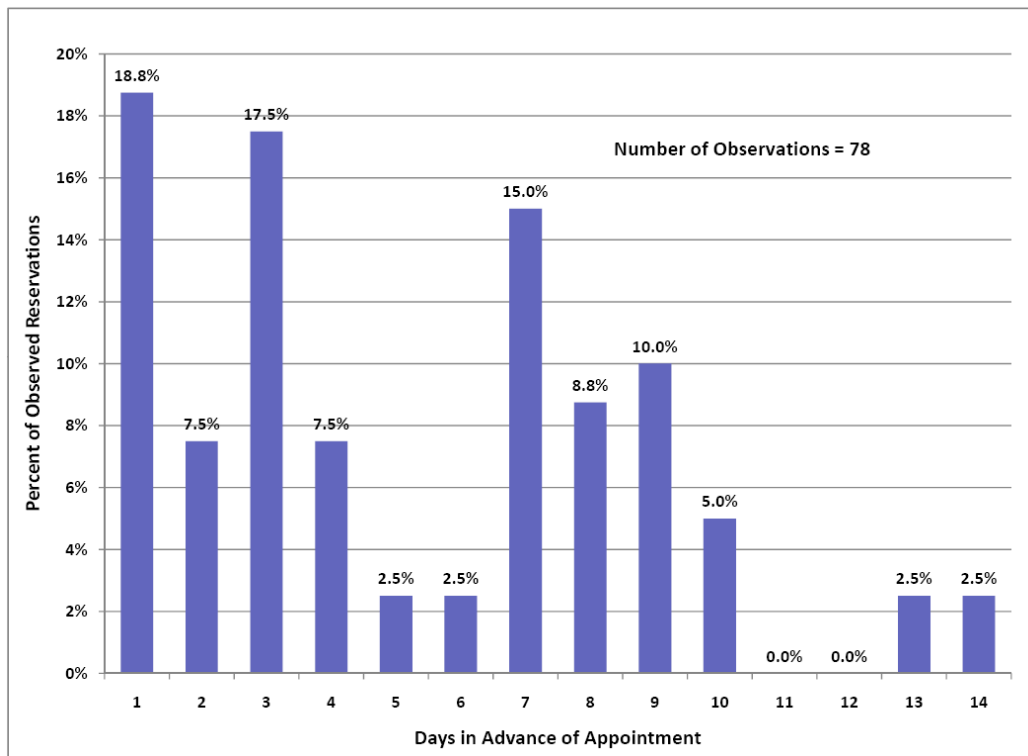


Figure 8.1 – Distribution of reservations by number of days in advance of requested trip

The analysis of reservations in the observed calls shows some day-to-day variation, as would be expected in this relatively small sample; however, some inferences may be made. The analysis found that approximately 19 percent of the observed trip requests were for next-day service and approximately 44 percent were for service in one to three days of the call. Another 27.5 percent were made 4 to 7 days in advance of the trip. Reservations made more than a week in advance comprised approximately 29 percent of the total, including the 5 percent that were made more than 10 days in advance. In itself this pattern does not conclusively demonstrate that customers feel pressured to schedule trips far in advance in order to receive service at the times of their choice; however, many paratransit systems see a distribution of calls that is loaded much more heavily in the 1 to 3 day period before the trip, with a smaller proportion of calls more than 7 days in advance.

Combined with the stated policy in the Metro Plus Ride Guide that “Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip,” the observed distribution of trip requests suggests that many customers do feel tacit pressure to request trips more than a week in advance, and it is therefore probable that some Metro Plus riders are discouraged from using Metro Plus for trips that they were not able to schedule more than three days in advance. In any case, the CSRs must not ask customers to make reservations more than three days in advance, and LANTA must remove the statement from the Ride Guide requesting customers to make reservations at least two or three days in advance.

## Trip Confirmations

During the on-site visit, review team members considered the following questions as part of its analysis of the batch scheduling and call back processes here and in Section 9.3 below:

- Does the transit system record and honor the originally requested time to meet part of its response time obligations under the DOT ADA regulations and ensure that riders are not required to travel more than one hour before or after the time the customer wishes to travel?
- Does the rider have a realistic opportunity to negotiate when he receives the scheduled pickup time, which is provided during the call-back, whether the call back happens because the rider calls the transit system, or the transit calls the rider?
- If a new scheduled time is negotiated, is the original requested time preserved?
- After the call-back and realistic negotiation, is there a possibility that the transit system would adjust the scheduled time again?
- Do call backs take place too early or too late in the day to be practical?

Late in the afternoon, several CSRs, or other staff if the call center is very busy, are given sections of the consolidated trip schedule for the following day to make confirmation callbacks to each customer confirming the trip and giving the estimated pickup time. The consolidated trip schedule is discussed in Section 9.3 (Daily Operations) in the discussion of scheduling procedures. Review team members observed one CSR describing the beginning of the 30-minute pickup window rounded to the nearest 5 minutes while another CSR gave the customer a 30-minute range beginning 15 minutes before the scheduled time, again, rounded to the nearest 5 minutes. Both CSRs made hand notations to indicate that the customer had been reached and

what pickup time they had been given. Alternatively, a CSR would note that a message had been left on the customer's answering machine or voicemail or that the customer could not be reached.

Metro Plus does not call customers who have subscription trips to confirm their scheduled pickup times. For customers whose schedules do not vary this may not be a problem; however, as described in the next chapter of this report, some subscription trips are not locked prior to batch scheduling, and the pickup times can vary from day-to-day. This issue was also mentioned during the customer interviews in advance of the site visit.

## 8.6 Findings

1. LANTA recorded seven trip denials for the 10-month period prior to the review. LANTA could not determine whether these denials were for trips requested by ADA or non-ADA passengers.
2. LANTA's policies do not explicitly address the requirement to schedule trips within one usable hour of the customer's requested time.
3. LANTA accepts reservations Monday through Friday from 8 a.m. until 4 p.m. Reservations are not accepted on weekends or holidays. As a result, next-day trips cannot be booked for Sunday, Monday, or the day after a holiday. The DOT ADA regulations require that, at a minimum, an agency accept trip requests made the day before the trip (49 CFR § 37.131(b)). Requests must be accepted during normal business hours, including on days that the agency may not otherwise be providing service.
4. Metro Plus does not accept trip requests for service prior to 7 a.m. on weekdays and Saturdays, although many fixed routes began operating between 5:15 and 6 a.m. This discrepancy in weekday service hours is inconsistent with the DOT ADA regulation for hours and days of service
5. During call observations, ECC CSRs appeared to accept most of the requested trip times without negotiation, and the negotiated trip times that were observed did not constitute denials. However, CSRs routinely scheduled drop-offs 15 minutes before the requested time and return trip pickups 15 minutes after the estimated end of doctor visits and similar appointments without the callers' knowledge. This may result in earlier drop-offs and later return trip pickups. Differing presumed drop-off and pickup times can also create confusion between riders and the drivers and dispatchers and can contribute to no-shows.
6. CSRs were observed advising customers to make reservations at least two or three days in advance, as stated in the Ride Guide. The analysis of reservations in the observed calls suggests that customers may feel pressured to schedule trips at least three days in advance in order to receive service at the times they wish to travel. This practice, together with the statement in the Ride Guide that Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip, probably discourages some Metro Plus riders from using the service when they cannot request a trip well in advance, and may deny service to these riders. It is inconsistent with the next day service requirement in the DOT ADA regulation for LANTA to request a minimum of two to three days' notice be given for adequate scheduling of a trip, nor for CSRs to ask that customers do this.

## 8.7 Recommendations

1. LANTA should track whether a trip denial is for a trip that is being requested by a rider who is certified for ADA complementary paratransit service.
2. Revise the Metro Plus policies and procedures to ensure that trips are negotiated within the allowed interval.
3. Develop procedures for accepting next-day reservations for Metro Plus ADA service during weekends and holidays.
4. LANTA should forward any call-backs in which the rider objects to the offered pickup time to a dispatcher who will attempt to adjust the time closer to that requested by the rider.
5. Revise Metro Plus service hours to correspond with LANTA's fixed route service, and accept trip requests for service before 7 a.m. on weekdays and Saturdays.
6. Remove from the Ride Guide all statements requesting a minimum of two to three day notice be given for adequate scheduling of a trip, and instruct CSRs not to ask that customers do this.

## 9 Service Performance

Section 37.131(f) of the DOT ADA regulations for complementary paratransit service prohibit capacity constraints, including missed trips, a substantial number of untimely trips, and excessively long rides and other operational practices that limit the availability of service to paratransit eligible riders. Consequently, the review team examined how the service performed in terms of on-time performance, the handling of missed trips and no-shows, and on-board travel times for LANTA's ADA complementary paratransit service.

At the time of the review, there was no written standard regarding missed trips when ECC fails to provide a trip. Consequently, the review team examined on-time performance, missed trips and no-shows, and on-board travel times for Metro Plus paratransit service.

The review team conducted the following activities to assess service quality:

- Obtained customer input regarding on-time performance and travel times through telephone interviews and a review of complaints filed with LANTA
- Reviewed Metro Plus's relevant service policies, procedures, and standards
- Observed Metro Plus's scheduling and dispatch functions and interviewed the schedulers-dispatcher
- Interviewed vehicle operators about schedules provided and dispatch support received
- Reviewed Metro Plus's on-time performance and travel time records
- Reviewed "raw" trip data to assess on-time performance and travel time
- Compared travel times of ADA complementary paratransit trips with those of comparable fixed route trips

### 9.1 Customer Comments

When asked about on-time performance, three of the riders and both agency representatives interviewed said that on-time performance both for pickups and drop-offs was a problem. The amount of time the vehicle is late can range from less than 30 minutes to as much as two hours. Afternoons seem to present more of a problem than earlier in the day. One respondent indicated waiting two hours after the doctor's office called for a ride before the vehicle arrived. This individual indicated that when she goes to the doctor, as soon as she enters the examination room the doctor's office calls to say she is ready so she will not have to wait as long for a return ride home.

Metro Plus does batch scheduling and all customers with demand trips and some customers with subscription trips are called back the day before service to confirm the pickup time. Half the respondents said that when they call Metro Plus on the day of service to confirm, the requested pickup times have been changed by as much as 30 minutes. One customer with a subscription trip said that sometimes the scheduled time that was confirmed had been changed.

Several customers commented on long ride times and circuitous routing, especially for subscription trips for dialysis and adult day care customers. One respondent reported a three-hour ride time for a trip that took her from Allentown to Whitehall to Bethlehem and finally



home to Allentown, with another passenger still on board going to Emmaus, a trip that traveled north, to east, to south, and then west.

There were also two respondents who referred to the possibility of drivers' reporting that they had provided trips that were not actually completed, having entered the trip as "performed" on the MDT having not actually transported the rider. A respondent reported an exchange between her doctor's office and an ECC dispatcher in which the dispatcher indicated that the woman waiting for her ride had already been dropped off at home.

Also, as described in Section 3, at the time of the review there was one complaint on file with FTA concerning ADA complementary paratransit services provided by LANTA. In July 2007, the Lehigh Valley Center for Independent Living filed 117 complaints from 56 individuals with the FTA Office of Civil Rights. The complaints alleged violations of Title II of the ADA by LANTA, Metro Plus, and its contractors. The complainants' general allegations stated that they have experienced:

- Significantly untimely pickups either for initial or return trips
- Trip denials or missed trips
- Trips with excessive trip lengths
- An inability to schedule service due to busy signals or long hold times
- Standing order trips that were not being honored or not being cancelled when no longer needed
- Poor customer service from drivers and dispatchers
- Lack of adequate backup capacity to handle same-day problems
- Inefficient scheduling of paratransit trips
- Unsafe driving practices by paratransit drivers.

During the following months these issues were investigated and responses prepared for both FTA and Pennsylvania DOT. In a letter to Metro Plus dated September 17, 2007, Easton Coach outlined systemic actions taken to address the issues raised in the complaint. In December 2007, Metro Plus provided information requested by FTA in response to the complaint.

LANTA responded that, at the time of the complaint, service had been provided by multiple contractors and was in the process of being transitioned to a single contractor, Easton Coach. LANTA acknowledged that there were difficulties during that period and the transition was an attempt to address these types of concerns. The review team considered this input when conducting the review of LANTA's Metro Plus service.

## **9.2 Service Standards and Policies**

### **On-Time Performance Standards**

In its response to FTA's information request, LANTA stated its on-time performance standard for pickups and drop-offs was stated as follows:

The on-time performance standard for the LANTA Metro Plus system is 90 %. This is comparable to the on-time performance of the Metro fixed-route bus system.

A pick up is considered on be on-time if it is made within 15 minutes before or after the negotiated pickup time. A dropoff is considered on time if it is made no more than 15 minutes after the negotiated pickup [sic] time.

The ECC operations manager monitors the on-time performance standard daily by formally reviewing the “Performance Issues Report,” which provides detail of all trips that fall outside of the on-time performance standard.

The information in the Metro Plus Customer Ride Guide is consistent with this standard; it states:

Customers should be ready to go fifteen (15) minutes prior to their scheduled pick-up time. A pick-up is considered “on-time” if it occurs within fifteen (15) minutes before or fifteen (15) minutes after the scheduled time. The driver will notify the dispatcher if the van will be more than fifteen (15) minutes late, so that the dispatcher can attempt to contact the rider and inform them of the new estimated pick-up time.

There was no standard applicable to early drop-offs. This is not appropriate, as very early drop-offs are not only inconvenient and may discourage use of ADA complementary paratransit, but also potentially hazardous if a rider arrives for a morning appointment before a building is open must wait outside in weather that may be inclement.

The Ride Guide does not mention a drop-off standard.

The 90 percent performance standard for a 30-minute pickup window is quite lenient by industry standards. Systems using a 90 percent standard generally have smaller pickup windows (e.g., 20 minutes), and systems with 30-minute windows generally require a higher percentage to be on time.

## **No-Show and Missed Trip Definitions and Performance Standards**

Under §37.125(h) (1) of the DOT ADA regulations, transit operators may establish an administrative process to suspend ADA paratransit service, for a reasonable amount of time, to eligible individuals who establish a pattern or practice” of missing scheduled trips. Trips missed by the individual beyond his or her control (including, but not limited to, trips which are missed due to operator error) shall not be a basis for determining that such a pattern or practice exists. Appendix D explains that “pattern or practice” involves, intentional, regular, or repeated actions, not isolated, accidental, or singular incidents. In particular, trips that are missed due to operator error are not attributable to the individual passenger for this purpose.

Similarly, §37.131(f) prohibits transit operators from engaging in operational patterns or practices that significantly limit the availability of ADA paratransit service to eligible persons, including substantial numbers of missed trips. As with passenger no-shows, operational problems outside the control of the transit operator do not count as a basis for determining that a pattern or practice under this provision. For example, if something that could not have been anticipated at the time the trip was scheduled (e.g., a snowstorm, an accident or incident that traps the paratransit vehicle, like all traffic on a certain highway, for hours), the resulting missed trip would not count as part of a pattern or practice. On the other hand, if scheduling practices fail to account for regularly-occurring traffic conditions or vehicles experience frequent mechanical breakdowns due to poor maintenance practices, a pattern or practice may exist.

LANTA's Metro Plus Customer Ride Guide defines "no-show" in the context of customer responsibilities and sanctions for repeated instances of not appearing for a scheduled pickup:

A "no-show" is recorded when: a customer books a trip and, when the van arrives, the customer is not available for travel or waves the driver on. The van driver will wait 5 minutes past the scheduled pickup range of time.

No-shows do not include trips that are missed for reasons that are beyond the customer's control for, instance; scheduling problems, late pickups, and other operational problems. An example of a no-show beyond the customers control would include a situation where the van is late and the customer has found an alternate source of transportation.

## On-Board Travel Time Standard

"[S]ubstantial numbers of trips with excessive trip lengths" are among the examples of prohibited capacity constraints included in § 37.131(f)(3)(i)(C). Since paratransit is a shared-ride service, trips between Point A and Point B will usually take longer than a taxi ride between the same points, and involve more intermediate stops. However, when the number of intermediate stops and the total trip time grows so large as to make use of the system prohibitively inconvenient, a capacity constraint could exist. Generally, total transit time aboard paratransit should be comparable to the same trip taken on the fixed-route system, after accounting for any transfers for multi-route trips, waiting time at each end of the trip, and travel to and from the bus stop.

LANTA's response to FTA's information request included its travel time standard:

The standard for maximum travel time for an individual trip is twice the amount of time that an equivalent trip would take on the fixed route (LANTA Metro) system including transfer time.

The [ECC] Operations Manager reviews the report daily and ensures that any trip that lasts longer than two hours meets the "fixed route times two" criteria. If not, he works with the scheduling department to construct an alternative plan for that trip to ensure that future trips are compliant with the length of trip standard.

There is no standard for the maximum overall trip time or the percentage of trips that may exceed such a maximum time. The monitoring procedure described in LANTA's response suggests that 2 hours is the guideline used by ECC in identifying trips that may exceed the standard of twice the fixed route travel time.

Although the LANTA service area is large, and trips between the west end and east end of the service area are necessarily long, the performance monitoring relies on the judgment of the ECC Operations manager to determine if the trip time is excessive in relation to its distance.

LANTA's paratransit travel time standard fails to meet the regulatory requirement in § 37.121 that ADA complementary paratransit service be comparable to fixed route service. FTA recommends avoiding standards that are based on general comparisons to fixed route travel times, such as 1.5 times or 2 times fixed route travel time, which would not be appropriate for very short or very long paratransit trips.

## 9.3 Daily Operations

### Scheduling Procedures

Easton Coach operates service out of two garages, one in Easton and one in Whitehall Township. One person in the Easton office handles the scheduling of trips for both garages. At the time of the review team’s site visit, there were 110 runs: 62 assigned to the Easton Garage and 48 assigned to the Whitehall Garage. The number of runs available for Metro Plus service ranges from 100 to 105 on weekdays; not all runs are scheduled to operate every weekday, 32 to 34 on Saturday, and three on Sunday. ADA and non-ADA paratransit trips are commingled on the same vehicles. Numbers do not include service that Easton Coach provides under a separate contract for the Good Shepherd Hospital, which is a local rehabilitation hospital in Allentown.

Table 9.1 shows the number of runs available for Metro Plus per day. The nomenclature in the table is ECC’s, and it refers to the destinations served by the vehicles. Thus, “agency” trips are booked by the rider to one of the institutions serving people with disabilities, generally but not exclusively as subscription trips. These are not agency trips in the sense that they are provided under contract to an agency and the runs that ECC does provide under agency contracts are excluded from the table.

**Table 9.1 – Metro Plus Runs**

Run Type	Mon.	Tues.	Wed.	Thurs.	Fri.	Sat.	Sun.
Dialysis	27	26	27	26	27	22 or 24	0
Agency	56	56	56	56	56	0	0
Demand	16	21	19	20	21	10	3
Floater	1	1	1	1	1	0	0
<b>Total Runs Available</b>	100	104	103	103	105	32 or 34	3

Trips to an agency or dialysis center comprise a majority of the weekday trips. Saturdays alternate between 22 and 24 dialysis runs. Only 16 to 20 percent of the runs on any given weekday are designated for demand service, meaning trips to destinations such as shopping or doctor’s appointments. ECC managers indicated that the runs designated for demand service do not have any subscription trips assigned to them, and that they are used for a mix of ADA and non-ADA service. ECC managers also explained that, when necessary and as appropriate, for scheduling purposes an agency run might be used to provide demand trip service for an individual rider.

The run schedules are a mix of straight and split shift runs. On weekdays, the first shift has runs starting as early as 4 a.m. and continuing until approximately 1:30 p.m. These are primarily runs assigned to transport passengers to dialysis clinics (11 runs). Second shift runs operate from 10 or 11 a.m. until about 6 or 7:30 p.m. (16 runs). The remaining runs have staggered start and end times to provide coverage throughout the day.

Before running the batch scheduler, subscription trips that are assigned to runs are “locked” to the respective run. When a trip is locked to a run the batch scheduler does not reschedule the trip. Not all subscription trips are assigned to runs, for example, trips to destinations other than an agency or a dialysis center. The batch scheduler may reschedule trips that are not locked onto a run. The batch scheduler stated that any of the subscription trips not assigned to or locked on a run and subsequently moved during the batching process do not appear on the call-back sheets

used by CSRs to notify passengers of their pickup time. During the consumer interviews, one consumer indicated that the pickup time of her standing order has been changed on occasion. This consumer was made aware only when she placed a call to ECC to confirm her rides.

During observations and interviews, the review team determined that ECC recorded the time originally requested by the rider in keeping with the response time requirement in the DOT ADA regulations, but was unable to verify whether or not this time is changed when ECC performed batch scheduling.

As described above, only riders who scheduled “demand trips” receive call-backs confirming their pickup time. The only riders who get call backs are those making reservations for demand trips only. Those who have standing order trips do not get call-backs confirming pickup times. In addition, not all standing order trips are “locked” onto runs but are scheduled with demand trips. The scheduled times for standing order may vary from day to day within the 0 to 30 minute scheduling window. So customers with these types of standing order trips do not have the practical opportunity to negotiate a pickup time.

Since no negotiations were observed during call backs, the review team was unable to determine whether the original requested time would have been preserved, if a new scheduled time was negotiated.

The review team determined that LANTA might adjust the scheduled pickup time after the call back and potential negotiation. The review team sampled call-back sheets and compared with the times in TransView. Drop-off times for 10 percent of the records sampled (with requested drop-off times) were different by at least 10 minutes. Pickup times for trips with requested pickups times were at least 15 minutes different for 32 percent of the records sampled.

Changes to the negotiated time without prior approval of the rider is a poor practice and may result in an in trip cancellation or an inappropriate no show. If a rider expects a 9 a.m. pickup, his or her expectation is that the vehicle will be on time if it arrives between 8:45 a.m. and 9:15 a.m, based upon LANTA +/- 15 minute on-time pickup window. If the scheduler subsequently adjusts the pickup time for 9:15 a.m., the on-time window becomes 9 a.m. until 9:30 a.m. The ECC driver’s mobile data terminal (MDT) lists only this adjusted scheduled time. Since the adjusted scheduled time would be 9:15 a.m. on the manifest, the driver would think that he may arrive at 9:30 a.m. and still be on time. In fact, in this example, the driver would be 15 minutes late. Conversely, if the pickup time is adjusted to 8:15 a.m, the driver may think that he can arrive as early as 8 a.m. and the customer may not be ready to travel. ECC should contact the customer and ask if the scheduled time change is acceptable prior to instituting the change on the schedule.

Once subscription trips are “locked” to a run the batch scheduling process begins. Since the demand trips are usually scheduled to a run when the customer calls, running the batch scheduler is a way to optimize the schedule. The batch scheduler looks at the demand trips currently assigned to runs, any demand trips on Route 0 (unassigned), and any “unlocked” subscription trips, and reassigns them to runs. Any trips that cannot be assigned to runs are placed on Route 0 (unassigned). The batch schedulers have been advised by TransView support staff to run the batch scheduling process more than once. The first batch process is run using an average speed setting of 25 miles per hour. Once the process is finished, it is run a second time with an average speed setting of 26 miles per hour. If needed the batch is run until the batch scheduler is satisfied

with the results. The batch scheduler indicated that he usually does not have to run the batch more than twice.

After the scheduler has finished batching, he reviews “Route 0”, which is the designation for trips in the system that have not yet been assigned to a run or scheduled, and tries to manually schedule unassigned trips to runs. He does this for trips earlier than 9 a.m. Any trips remaining unassigned are handled in real time by the dispatchers on the day of service. When the scheduling process is complete, appropriate staff is notified that the driver manifests may be printed. The call center supervisor is notified and the process of calling riders with their pickup times begins. When the scheduling process is completed, call-backs are made to provide those customers with scheduled pickup times by early afternoon the day before service. The review team observed call-backs occurring as early as 2 p.m.

ECC prints a consolidated trip schedule when the scheduling process is completed. This consolidated trip schedule is a list of all trips for the next day of service. The list is divided among the CSRs, or other staff if the call center is busy, for call-backs to provide those customers with scheduled pickup times. This process starts by early afternoon the day before service. The review team observed call-backs occurring as early as 2 p.m., and since reservations for next-day trips are accepted until 4 p.m., there may be further adjustments in the schedule for some customers who have already received a call-back with their pickup time.

## **Dispatch Procedures**

The review team observed dispatch operations during two peak periods: Monday afternoon, April 27 and Tuesday morning April 28, 2009. Team members’ impression was that dispatch office staff performed in a professional manner and did a good job of keeping track of trips to be performed and trips to be scheduled from Run 0. Dispatchers appeared to make good use of the available software tools, especially the recording of trip notes.

There are a maximum of three dispatchers on duty to handle Metro Plus service during the week, and a maximum of two on duty on Saturdays. The lead dispatcher starts at 5 a.m. weekdays and at 7 a.m. on “Green” Saturdays, when extra agency runs are operated under contract for the Hospital of the Good Shepherd. On Sunday, when there are a maximum of three runs in service, there is one dispatcher on duty from 7 a.m. until 7 p.m.

As discussed under scheduling, during peak periods there may be 100 to 105 runs. Staffing the dispatch office with three people on weekdays means that each dispatcher can be responsible for up to 35 runs. This number is at the high end of industry practice when compared with dispatch operations for other paratransit systems using MDTs.

A dispatcher explained that ECC tries to have two spare vehicles available at the Easton garage, and one at the Whitehall Township facility in the event a vehicle breaks down or a morning split shift run returns late to the garage. A problem occurs when no spare vehicle is available. If a morning split shift run returns late to the garage, the afternoon split shift would run late. A dispatcher compensates by moving the first few trips from the late-running afternoon run to other runs. If there is a vehicle issue at pullout and a spare is not available, the run is closed and trips are moved to other runs.

Dispatchers stated that there is no extra board available to cover for drivers who “call off, i.e., call in sick or fail to show up). If a driver calls off, a dispatcher may call in a second shift driver to cover the run. If no driver is available to cover a run, the trips are placed on Run 0 and then

reassigned to existing runs by a dispatcher. The review team collected information on driver call-offs for the first three months of 2009 and the pullout sheets for both garages for the week of March 29, 2009. For the first three months of 2009, there were 125 driver call-offs an average of one to two drivers calling off per day. The number of call-offs ranged from 0 (for 37 of 90 days), to nine call-offs on January 28.

Review team members analyzed pullout sheets for March 29 through April 4, 2009 for drivers who called off and whose runs were not put into service. This analysis found that less than 1 percent of the runs (5 of 581) for this sample period were closed due to a driver call-off. The number and percentage of call-offs at the Easton garage was about 1.2 percent, and the call-offs at the Whitehall garage amounted to less 0.5 percent of all pullouts. Attachment I presents the results of this analysis.

At the time of the review, the morning dispatcher is responsible for reviewing the runs for reasonableness and inserting any unscheduled trips. During the review team's morning observation in the dispatch office, the morning dispatcher was reviewing runs and reassigning trips as needed. He said that all dispatchers are responsible for monitoring Route 0 to ensure that trips on this list are scheduled to runs. Dispatch staff indicated that generally Run 0 is cleared the night before. However on the day of the review team's observation (April 28) three drivers called off. At 8:15 that morning there were 13 trips on Run 0. The first trip on Run 0 had a 9:15 a.m. pickup time.

It appears that there is an inadequate supply of spare vehicles and extra board drivers. Dispatchers noted that if a spare vehicle and driver are not available, trips are reassigned from the affected run to other runs in service. When this occurs, the scheduled time of the reassigned trips may be changed to allow the switching of the trips. It appears that this is more likely to happen with the split shift runs. A morning split shift vehicle may return to the garage late, causing a problem with the afternoon split run. The same procedures are followed in the event of a driver call-off. If an alternate driver cannot be found, the original run is closed and the trips are reassigned to other vehicles or placed on Run 0 for later scheduling. The effect of these events is a greater workload on the dispatchers and drivers already in service. More importantly, it is more likely that on-time performance will be affected as a result of adding trips to existing runs, which may be the source of some complaints from customers.

## 9.4 Vehicle Driver Interviews

The review team interviewed 10 Metro Plus drivers. The interview form used is included as Attachment J. Drivers ranged in experience from 8 months to over 11 years, with most having only a year or so of experience.

Drivers said that they provide door-to-door service and most said they will assist someone using a wheelchair up or down one step and sometimes three steps. Drivers said they assist passengers to or from the door but do not go inside. One driver stated that he sometimes goes inside to help someone coming back from dialysis. Others said it is up to the driver to decide how much assistance to provide given the situation.

Most drivers said they enjoyed interacting with customers and getting to know people. Most thought the job was not that hard. Drivers had differing opinions about what was the hardest part of their job. Some thought it was the traffic; others thought it was keeping on schedule. Some

find some passengers difficult to service. Several drivers mentioned that sometimes pickups were scheduled too close together.

Most drivers thought the schedules were acceptable to work with but a few found them to be a little close. When something goes wrong, most drivers said dispatch was helpful and would provide assistance. One said “I am the captain of my ship” and that he resolved problems himself.

When asked to describe the on-time pickup window, there was some variation in responses: most said +/-15 minutes from the scheduled pickup time, several said +/-10 minutes, another said 15 minutes before. Most said they wait 5 minutes in the on-time pickup window before requesting a no-show from dispatch. If they arrive early, most drivers said they wait around the corner or might ask if the passenger is ready to go, but will not push them. Most drivers said they would call dispatch if they were running late to see if dispatch could help them or reach the passenger to let them know.

Overall, the drivers said there were not a lot of issues. Most cited a good working relationship with dispatchers who will help out when needed. Several also stated that it was better at the time of the review than in the past.

## 9.5 On-Time Performance

### Preliminary Comparison of Data Groupings

While on-site, the review team evaluated on-time performance through analysis of data provided by Easton Coach Company (ECC). These on-site data were downloaded from the TransView database for the months of January, February, and March 2009. While the downloads provided a very large number of trips for analysis of on-time performance, the manner in which ECC codes the trip data makes it difficult to filter out non-ADA trips. Most ADA complementary paratransit trips are assigned to the billing code “LAN” at the time the reservation is made; however, when a Metro Plus eligible rider is also eligible for the MATP program, their medical trips are assigned to MATP. Therefore, a significant but unknown portion of ADA paratransit trips are not identified by the LAN code.

For this reason, a preliminary analysis was performed to determine if LAN-coded trips had different on-time performance than all trips, the set of ADA and non-ADA trips. The conclusion of this preliminary analysis was that LAN-coded trips were not systematically different than the large universe of all trips, and the LAN-coded trips provide a good representation of ADA trips. This is not surprising, as ADA trips and non-ADA trips are served on the same vehicles.

In addition to comparing LAN trips with all trips, a second preliminary analysis was done to determine if demand trips, those scheduled individually by calling for a reservation, had different on-time performance from subscription trips.

The preliminary analysis was performed as follows. First, the data was filtered in two different ways:

1. To include all trips except for contracted services to the Good Shepherd Rehabilitation Hospital. These are the only trips contracted to an agency and are not shared by other riders



2. To include only ADA trips<sup>1</sup> excluding trips funded by MATP, Shared Ride, and other non-ADA trips that are part of the coordinated service

The analyses of the ADA trips and all trips except Good Shepherd trips were compared to determine if there were any systematic differences in service for the ADA customers.

For the preliminary comparison of demand trips and subscription trips, the review team also analyzed an additional two weeks of data from April 2009. These data were filtered to include only demand trips and exclude subscription trips to determine whether there was any substantial difference in performance for demand trips. Filtering was possible in the April data because operations had been reorganized in March to assign particular vehicles to demand trips, whereas the assignments had not been systematic in previous months. Performance for these demand trips was then compared to the larger samples of all trips and LAN trips, both of which contained both subscription and demand trips.

The comparative analyses of the March and April 2009 data indicated that on-time performance was not systematically different for ADA and non-ADA trips, although the on-time performance is marginally worse for a smaller sample of demand trips. All results are presented below in Tables 9.2 and 9.3.

**Table 9.2 – Preliminary Analysis of On-Time Pickup Performance for Three Data Groupings**

	All Trips (March 2009)		“LAN” (ADA) Code (March 2009)		Demand Trips (April 2009)	
Late Pickups						
> 45 minutes	1,020	2.7%	463	2.5%	47	3.2%
31-45 minutes	1,625	4.3%	766	4.2%	74	5.0%
16-30 minutes	4,667	12.2%	2,393	13.0%	214	14.5%
<b>In window (-15/+15)</b>	<b>26,447</b>	<b>69.3%</b>	<b>12,557</b>	<b>68.1%</b>	<b>972</b>	<b>65.9%</b>
Early Pickups						
16-30 minutes	3,139	8.2%	1,606	8.7%	122	8.3%
31-45 minutes	731	1.9%	389	2.1%	26	1.8%
> 45 minutes	534	1.4%	278	1.5%	19	1.3%
<b>Total</b>	<b>38,163</b>	<b>100.0%</b>	<b>18,452</b>	<b>100.0%</b>	<b>1,474</b>	<b>100.0%</b>

<sup>1</sup> The filter used for ADA trips was based on the “LAN” billing code which includes most but not all complementary paratransit trips and is therefore an approximation of the class of trips that are based on paratransit eligibility. In cases where a paratransit-eligible customer could ride for free, e.g., a Medicare-reimbursed medical appointment, a different billing code would apply for that trip, but if the same customer used Metro Plus for shopping, the trip would be billed to the LAN code.

**Table 9.3 – Preliminary Analysis of On-Time Drop-off Performance for Three Data Groupings**

	All Trips (March 2009)		“LAN” (ADA) Code (March 2009)		Demand Trips (April 2009)	
Late Drop-offs > 30 minutes After scheduled time	4,257	11.2%	2,069	11.2%	167	11.3%
16-30	4,772	12.5%	2,315	12.5%	230	15.6%
<b>In window (1-15)</b>	<b>9,129</b>	<b>23.9%</b>	<b>4,313</b>	<b>23.4%</b>	<b>399</b>	<b>27.1%</b>
Early Drop-offs						
0 to 15 minutes	11,956	31.3%	5,666	30.7%	416	28.2%
16-30 minutes	4,942	12.9%	2,402	13.0%	154	10.4%
31-45 minutes	1,887	4.9%	996	5.4%	68	4.6%
> 45 minutes	1,220	3.2%	691	3.7%	40	2.7%
<b>Total</b>	<b>38,163</b>	<b>100.0%</b>	<b>18,452</b>	<b>100.0%</b>	<b>1,474</b>	<b>100.0%</b>

LANTA provided commingled service on the same vehicles for both ADA complementary paratransit and other programs. Contracted agency trips are carried on different vehicles and not commingled with ADA complementary paratransit trips. The preliminary comparison of data groupings suggested that that:

1. Performance for LAN-coded trips is essentially the same as for all trips; therefore, the LAN trips are a good representation of ADA complementary paratransit trips, even though some ADA trips to medical destinations are not included in the set of LAN trips.
2. Performance for demand trips is not substantially different than for trips overall, and this distinction between demand and subscription trips did not require further analysis.

### **On-Time Performance for ADA Trips, January to March 2009**

The review team then analyzed LANTA’s LAN-coded trips, which included most but not all of the ADA complementary paratransit trips) for a 3-month period, January to March 2009. Results of this analysis for pickups are presented in Table 9.4.

As discussed in the Section 9.2 on Performance Standards, LANTA’s pickup window of 15 minutes before to 15 minutes after the negotiated time is common for many paratransit systems. Some systems use a smaller window, such as 10 minutes before to 10 minutes after the negotiated time. On-time performance in LANTA’s 30-minute window, including all pickups earlier than the window was approximately 65.6 percent for January to March 2009. This falls substantially short of LANTA’s performance standard of 90 percent and is relatively poor performance for a 30-minute pickup window. Pickups after the window comprised 22.8 percent of all trips, and 4.0 percent were more than 30 minutes past the window; (i.e. more than 45 minutes past the negotiated time).

The review team then analyzed LANTA’s ADA complementary paratransit trips for a 3-month period, January to March 2009. Results of this analysis are presented in Tables 9.4 and 9.5.

As discussed in the Section 9.2 on Performance Standards, LANTA’s pickup window of 15 minutes before to 15 minutes after the negotiated time is common for many paratransit

systems. On-time performance in window was approximately 65.6 percent for January to March 2009 (Table 9.4). This falls substantially short of LANTA's performance standard of 90 percent.

**Table 9.4 – Metro Plus ADA Pickups, January-March 2009**

<b>On-Time Category</b>	<b>Trips</b>	<b>Percent</b>
<b>All Late Pickups</b>		<b>22.8%</b>
>30 minutes past window (>45 min. after negotiated time)	2,017	4.0%
16-30 minutes past window (31-45 min. after negotiated time)	2,575	5.1%
1-15 minutes past window (16-30 min. after negotiated time)	6,893	13.6%
<b>In window (-/+15)</b>	<b>33,166</b>	<b>65.6%</b>
<b>All Early Pickups</b>		<b>11.6%</b>
1-15 minutes before window (16-30 min. before negotiated time)	4,287	8.5%
16-30 minutes before window (31-45 min. before negotiated time)	965	1.9%
>30 minutes before window (>45 min. before negotiated time)	626	1.2%
<b>Total Trips</b>	<b>50,529</b>	<b>100%</b>

Table 9.5 presents the review team's analysis of Metro Plus drop-off performance. As described in Chapter 8, most trips are scheduled around a drop-off time, even when the rider does not specifically request a drop-off time. LANTA's definition of an on-time drop-off is that the drop-off be no more than 15 minutes past the scheduled time. If the drop-off meets this standard, the rider will not be late for an appointment because the CSRs scheduled drop-offs 15 minutes before the customer's requested time, e.g., for a requested 9 a.m. appointment, the CSR enters 8:45 a.m. into TransView.

**Table 9.5 – Metro Plus ADA Drop-Offs, January-March 2009**

<b>On-Time Category</b>	<b>Trips</b>	<b>Percent</b>
<b>All Late Drop-Offs</b>		<b>27.5%</b>
>30 minutes after scheduled time (>15 min. after requested time)	7,102	14.1%
16-30 minutes after scheduled time (1 to 15 min. after requested time)	6,796	13.4%
<b>All Early or On-time Drop-Offs</b>		<b>72.5%</b>
1-15 minutes after scheduled time (0 to 14 min. before requested time)	11,671	23.1%
0-15 minutes before scheduled time (15 to 29 min. before requested time)	14,590	28.9%
15-30 minutes before scheduled time (30 to 44 min. before requested time)	6,319	12.5%
31-45 minutes before scheduled time (45 to 59 min. before requested time)	2,413	4.8%
>45 minutes before scheduled time (>60 min. before requested time)	1,638	3.2%
<b>Total</b>	<b>50,529</b>	<b>100.0%</b>
<b>Alternative 30-minute Drop-Off Window:</b> +15 to -15 minutes relative to scheduled drop-off time (excludes drop-offs more than 30 minutes before requested)	<b>26,261</b>	<b>52.0%</b>

LANTA considers all early drop-offs to be on time, no matter how much earlier than the requested drop-off time. As discussed in Section 9.2, this definition of an on-time drop-off is not appropriate, since very early drop-offs are not only inconvenient for the rider but may be

potentially hazardous (e.g. arriving in inclement weather before the building at their destination is open and must wait outside).

Table 9.5 summarizes the percentage of trips that are later than the stated drop-off window and gives two different summary measures of timeliness based on how early a drop-off is considered acceptable. The LANTA stated on-time policy for drop-offs includes all drop-offs before the scheduled time to be on time, no matter how early; however, this definition is unusually permissive, as discussed above in Section 9.2. Accordingly, a more appropriate drop-off window is also shown in Table 9.5 that excludes drop-offs more than 30 minutes before the requested arrival time. In either case, the portion of drop-offs that are considered late is 27.5 percent, a very large portion by industry standards.

LANTA's drop-off policy is consistent with its practice of scheduling drop-offs 15 minutes earlier than the customer's requested time. Thus, a drop-off 15 minutes after the scheduled time will get the customer to their appointment on time. On the other hand, a drop-off that is 30 minutes before the scheduled time will be 45 minutes before the customer's desired arrival time. This is a very long time for a rider to be left waiting before an appointment. For morning trips it may mean a long wait for a place of business to open and this wait can be not just inconvenient but hazardous in bad weather. In the sample that was analyzed, 20.5 percent of trips arrived more than 30 minutes before the requested time.

For many trips, such as medical appointments, work, school, and business appointments, an on-time drop-off may be more important to a rider than an on-time pickup. Similarly, the amount of time by which a drop-off is late can have greater consequence than for a late pickup. A late drop-off could lead to a missed appointment or class, or jeopardize employment if it is a recurring problem. Furthermore, dropping off a customer too early can result in the customer waiting outdoors for a facility to open in inclement weather.

LANTA should consult with the disability community and develop standards for on-time drop-offs and significantly late drop-offs. In establishing an on-time drop-off window, consideration should also be given to avoiding drop-offs that are too early. ADA complementary paratransit services often use on-time drop-offs windows, such as 30 minutes before the appointment time, in order to ensure on-time arrivals.

## **On-Time Performance for Time-Sensitive Trips**

Table 9.6 focuses on on-time performance for drop-offs on the initial or "going" trip, which is from the customer's origin to an appointment; Table 9.7 focuses on pickups for the final (or "return") trip that is usually from the appointment location back to the customer's residence. The filtering for "going" and "return" trips is approximate, based on the first trip of the day and last trip of the day, respectively, for each customer. The sum of the "going" and "return" trips is smaller than the total trips primarily because some customers make trips with three or four segments that involve more than one destination before returning home.

The analysis of drop-offs (Table 9.6) indicates that although LANTA does slightly better in making on-time drop-offs for customer appointments (70.7 percent on time) than for all trips (i.e., both appointment and non-appointment trips - 67.1 percent), both appointment and non-appointment trip performance falls substantially short of LANTA's performance standard of 90 percent.

**Table 9.6 – ADA Trips, March 2009, “Going” Trip Drop-Offs**

	All ADA Pickups		“Return” Trip Pickups	
Late Pickups				
>45 minutes	463	2.5%	275	2.8%
31-45 minutes	766	4.2%	376	3.9%
16-30 minutes	2,393	13.0%	1,274	13.1%
<b>In window (-/+15 mins. vs. scheduled pickup)</b>	<b>12,557</b>	<b>68.1%</b>	<b>6,616</b>	<b>68.2%</b>
Early Pickups				
16-30 minutes	1,606	8.7%	809	8.3%
31-45 minutes	389	2.1%	206	2.1%
>45 minutes	278	1.5%	151	1.6%
<b>Total</b>	<b>18,452</b>	<b>100.0%</b>	<b>9,707</b>	<b>100.0%</b>

**Table 9.7 – ADA Trips, March 2009, “Return” Trip Pickups**

	All ADA Pickups		“Return” Trip Pickups	
Late Pickups				
>45 minutes	463	2.5%	275	2.8%
31-45 minutes	766	4.2%	376	3.9%
16-30 minutes	2,393	13.0%	1,274	13.1%
<b>In window (-/+15 mins. vs. scheduled pickup)</b>	<b>12,557</b>	<b>68.1%</b>	<b>6,616</b>	<b>68.2%</b>
Early Pickups				
16-30 minutes	1,606	8.7%	809	8.3%
31-45 minutes	389	2.1%	206	2.1%
>45 minutes	278	1.5%	151	1.6%
<b>Total</b>	<b>18,452</b>	<b>100.0%</b>	<b>9,707</b>	<b>100.0%</b>

The margin of drop-off performance is therefore greater for “going” trips when compared to the “return” trips. The analysis of pickups (Table 9.4) indicates that performance is very similar for pickups at the customer’s initial location and pickups at a location such as a medical building or commercial location.

To summarize: the review team’s analysis for a 3-month sample period found that Metro Plus had an on-time pickup performance of 65.6 percent for a 30-minute window. Its drop-off performance was 52.0 percent if a 30-minute were to be used. Performance is only marginally better for the “going” trip drop-offs and return trip pickups. Allowing 34.4 percent of trips to be picked up outside the on-time windows that LANTA uses results in an operational pattern or practice of a substantial number of untimely pickup for Metro Plus customers that significantly limits the availability of service to ADA paratransit eligible persons...” and is therefore inconsistent with § 37.131(f)(3) of the DOT ADA regulations.

## Review of Late Pickups Data Sample by LANTA’s Contractor

After the on-site review, LANTA sent an e-mail to the review team on June 8, 2009, with an attached letter dated May 28, 2009 from its contractor, Easton Coach Company, stating that the review team’s analysis used “raw” data and underestimated the on-time performance compared with an analysis that was performed by ECC for a sample of data from the 12 months through April 2009. In part, the letter states that the methodology used “follows the process developed in consultation with LANTA’s independent auditors, Reinsel & Company.” (Reinsel Kuntz Leshner LLP performed a performance audit for LANTA in 2007.) The letter states that this analysis indicates a higher level of on-time performance than the analysis performed by the review team on downloaded data from the TransView database. LANTA and ECC characterized the downloaded data as “raw data” requiring adjustment. The ECC correspondence is presented in Attachment K.

At the time of the on-site visit, the FTA review team was neither able to examine the ECC data, which may include non-ADA trips, nor to verify the sampling procedure used. However, because LANTA transmitted the ECC analysis to the review team after the on-site review, this report contains a response, to the extent that one was possible given the information LANTA provided.

As described in the ECC letter of May 28, 2009 that was part of the correspondence, a “sample” of 5,239 trips for the 12-month period ending April 30, 2009, was analyzed. Of this sample, pickups for 1,055 trips (20.1 percent) were apparently outside the +/-15 minute pickup window; however, detailed examination of each trip found circumstances that, in ECC’s judgment, indicated that more than half of these apparently late or early trips (56.7 percent) were in fact on-time, raising the actual on time percentage to 91.3 percent. Four categories of apparently late or early trips were presented in the ECC letter:

1. On Time for Program. The ECC data review identified a set of trips involving groups of passengers headed to programs or treatment centers for which the pickup appears to be late, but since the drop-off was made in time for the customers’ program or appointment, the entire trip should therefore be classified as being on time. [However, the ECC letter does not extend this logic to state that *if a drop-off is late, the entire trip should be considered late.*] As described in the ECC letter, a pickup earlier or later than scheduled was negotiated with the customers by dispatch or the drivers themselves for these trips. Of the apparently late trips in the sample, 201 trips (3.8 percent of the total sample) were found to be in this category.

FTA Review Response: Although the pickup time on a “going” trip to an appointment may be less critical than arriving on time for the or appointment, on-time pickups are nonetheless in keeping with service that is comparable to fixed route and consistent with service that is free of prohibited capacity constraints.

FTA recommends that it is important to ensure that people are not only picked up on time but they get to where they are going on time as well. When most people make plans to travel, they think first about the time they need to be at their destination and then plan backward to the time that they need to leave. This is certainly the case when people use fixed route service—they first look at the schedule to see when the bus gets to the stop near their destination and then work backward to find the time they need to catch the bus.

ECC's data indicate that 3.8 percent of all pickups in the random sample were rescheduled on the day of the pickup; for morning pickups this would mean a negotiation took place just prior to the pickup time that had previously been confirmed with the customer. The reservations staff makes these call-backs late in the afternoon of the day before the appointment using the schedule that is reflected in the review team's downloaded data.

In addition, the review team's analysis of "going" trips in March 2009 (Table 9.5) indicates that 24 percent of the trips had drop-offs that were more than 15 minutes after the scheduled drop-off and therefore outside LANTA's stated drop-off window. The ECC letter does not explain why the distribution of actual arrivals in the full data set would be systematically different from the sample of 5,239 trips described in the letter. Therefore, the discrepancy between the ECC analysis and the review team's analysis is not explained unless the driver and dispatcher made a special effort in all of these cases to achieve an on-time drop-off. If the 201 sampled trips arrived in the drop-off window, it is likely that a large number of trips were rescheduled the same day but did not arrive on time. Same-day rescheduling may be a contributing factor in the large percentage of late drop-offs overall.

If a large percentage of pickups are being rescheduled with the customer just prior to the previously confirmed pickup time, it is likely that the on-time performance for pickups on the "going" trip needs improvement, either by scheduling them differently or by endeavoring to meet the originally scheduled appointment more consistently. If renegotiations occur, the trip should be rescheduled in TransView to reflect the new time, which would avoid the need for a detailed analysis to correct the data.

Although the ECC letter is not explicit about the reason for the change in pickup time, this category may correspond to what the Reinsel 2007 audit called "Agency Time Adjustment" or "Senior Center Time Adjustment." If so, this implies that the agency requested a change due to a delayed start for a program and that the customer was contacted by ECC to reschedule and dropped off on time for the delayed program. If this is so, both the pickup and drop-off time should be changed in TransView by canceling and rescheduling the trip. This would avoid confusion between late and rescheduled trips. There is not enough information in the ECC letter to determine what portion of this group of trips has those circumstances.

2. Center Line-up Situations. The paratransit van arrived on time at the curb of a major activity center for a "return" trip pickup but had to wait in a queue of several vans before it could board customers. The driver is instructed to register the pickup when the passenger is actually on-board, so the dispatcher knows the exact location of the passenger at all times. Therefore, the pickup appears to be late but is not. Of the apparently late trips, 142 trips (2.7 percent of the total sample) were found to be in this category.

The portion of trips that fall in this group is much larger than in the 2007 Reinsel audit (1.2 percent of sample). This may indicate a change in the scheduling of pickups at the major centers or it may be a result of a new policy on when the driver is to register the pickup on the MDT.

FTA Review Response: This explanation does not address the comparability of the service to fixed route and inconvenience to the customer, who was presumably waiting to board at the appointed time but had to wait for the actual pickup. The pickups should be scheduled to

anticipate the queue time, by either being spread out to reduce the queuing or by arriving early enough to load at the scheduled pickup time.

3. Passenger Late for “Return” Trip Pickup. The customer did not appear when the van arrived for a pickup, so the driver arranged a second attempt to pick up the customer and recorded the actual pickup time on the MDT. The example given is of a dialysis center where one of the four passengers scheduled for pickup is not ready at the appointed time. Of the apparently late trips in the sample, 173 trips (3.3 percent of the total sample) were found to be in this category.

FTA Review Response: These should not be considered late pickups, but the ECC procedure should be changed so that the original trip is canceled and rescheduled when the driver reports the situation to dispatch. This would make the pickup data meaningful.

4. MDT Issues and Driver Error. There is a malfunction in the MDT or the driver forgets to register the actual pickup and does so only at the time of the drop-off so that the data shows the pickup time to be the same as the drop-off time. Of the apparently late trips in the sample, 57 trips (1.1 percent of the total sample) were found to be in this category. This is 5.4 percent of the apparently late trips.

FTA Review Response: The review team analysis eliminated trips with zero or negative trip time before performing the on-time analysis. However some false trip data might still be included. It is recommended that LANTA adopt a procedure for drivers to report the actual pickup time in these instances through a written note or a call to the dispatcher. In addition, 5.4 percent is a very high error rate, which should be addressed by an operations supervisor. Furthermore, ECC is not considering the possibility that driver data entry error may also mis-record late pickup as early. One might estimate that the net difference is half, or 0.5 percent of the total sample.

The ECC letter concludes that these four categories plus an additional 0.5 percent of the sample (25 trips) were actually on time; no explanation is provided for these trips. Thus, the ECC analysis reclassified 568 of the 1,055 apparently late trips as on time. This represents 11.4 percent of the entire sample, raising the overall on-time performance to 91.3 percent. FTA would consider that categories (3) and (4), which comprise 4.4 percent of the sample of 5,239 trips should be reclassified as on-time. While trips in category (4) may also be on time, there are likely other trips classified on time that should be correctly re-classified as not on time. Categories (1) and (2) result in inconvenience to the customer and are not appropriate to consider as being on time.

Table 9.8 summarizes the ECC results and FTA responses. Table 9.9 summarizes the review team analysis results and an adjusted on-time pickup performance based on the assumption that 3.9 percent of pickups may appear to be late owing to ECC procedures regarding rescheduling trips when the customer is late or correcting errors due to MDT failure or driver error. The adjusted on-time performance for pickups of 69.5 percent is still well below LANTA’s standard of 90 percent. Allowing 30.5 percent of trips to be picked up outside the on-time windows that LANTA uses results in an operational pattern or practice of a substantial number of untimely pickup for Metro Plus customers that significantly limits the availability of service to ADA paratransit eligible persons...” and is therefore inconsistent § 37.131(f)(3) of the DOT ADA regulations.



**Table 9.8 – ECC Analysis of Sample of Apparently Late Trips and FTA Response**

Category of Adjustment	Trips	Percent of ECC Sample	FTA Response
(1) Pickup rescheduled later, drop-off on time	201	3.8%	Drop-off performance in sample does not agree with downloaded data analysis; the need for rescheduled pickups indicates a more general on-time issue.
(2) Van arrived on time, boarding delayed at large center	142	2.7%	Pickup still late from customer’ point of view; ECC could adjust scheduling practices to compensate.
(3) Customer not ready at large center, rescheduled pickup not in database	173	3.3%	Adjustment should be made to review team’s on-time analysis
(4) Driver error in recording pickup, correction not in database	57	1.1%	Adjustment should be made to FTA’s on-time analysis. However, ECC’s analysis does not account for potential driver error in ECC’s favor.
(5) Other reasons pickup not actually late	25	0.5%	Insufficient information to evaluate
Total percent ECC Reclassified as Not Actually Late	568	11.4%	
Total adjustment by FTA: (3) + half of (4)	202	3.9%	

**Table 9.9 – Adjustment to On-Time Performance Based on ECC Analysis**

	Analysis of Downloaded Data Jan. to Mar. 2009	Adjustment	Adjusted On-Time Performance
Pickups	65.6%	3.9%	69.5%
Drop-Offs (excludes drop-offs >30 min early)	64.5%	Not addressed in ECC analysis	64.5%

The analysis described in the ECC letter addresses pickups but does not specifically address late or early drop-offs except that the adjustments for rescheduled pickup time were defined to be trips which were “On Time for Program” so no adjustments were made in the results of the downloaded data analysis for drop-off performance.

## 9.6 Analysis of On-Board Travel Times

The Customer Ride Guide states that one way LANTA measures service quality is to compare paratransit ride times to the comparable fixed route ride time. The comparable fixed route ride time is stated in the Ride Guide as the time it would take to get from origin to destination by fixed route bus, including transfers.

The Metro Plus standard for maximum travel time for an individual trip is twice the amount of time that an equivalent trip would take on the fixed route (LANTA Metro) system including transfer time.

LANTA requires ECC to monitor trips for excessive length. The Operations Manager at ECC reviews a report (“Performance Issues Report”) containing trips greater than 2 hours in length and ensures that any trip on this report meets the “fixed route times two” criteria. If the paratransit trip exceeds the “fixed route times two” criteria, it is referred to scheduling. Scheduling is instructed to reschedule the trip so that the trip is not in excess of the “fixed route times two” criteria.

The review team conducted an analysis of all ADA eligible trips for the month of March 2009, during which LANTA provided 18,490 one-way trips. Table 9.10 shows the distribution of the trips as determined from the pickup and drop-off information recorded by drivers using MDTs installed on Metro Plus vehicles.

**Table 9.10 – On-Board Travel Times for All Metro Plus ADA Paratransit Trips: March 2009**

<b>On Board Travel Time</b>	<b>Number of Trips</b>	<b>Percent</b>
Up to 30 minutes	8,535	46.2%
30 minutes to 59 minutes	5,507	29.8%
60 minutes to 119 minutes	3,926	21.2%
120 minutes or more	522	2.8%

The table shows that 76 percent all trips provided in March had ride times of less than 60 minutes. Of the trips 60 minutes or longer, approximately 21 percent were between 60 and 119 minutes and another approximately 3 percent were 120 minutes or longer.

The review team selected a sample of trips greater than 30 minutes for further review. Ten trips from each of the three categories were selected: 30 minutes to 59 minutes; 60 minutes to 119 minutes; and 120 minutes and more. The travel times for the 30 trips were compared to travel times for comparable trips on the Metro fixed route system.

The Metro Supervisor of Operations and Support Services assisted the review team by developing fixed route itineraries and estimating the comparable fixed route travel times. Fixed route itineraries were found for all 30 trips in the sample.

Each estimate of fixed route travel time included the following components:

- Travel time on each bus route
- Transfers (waiting time) for multi-route trips (included in fixed route travel time)
- Walking time at each end of the trip (and between routes in the middle of the trip, as necessary), using an estimated speed of three miles per hour (20 minutes per mile)
- A five minute wait time at the start of the itinerary

Table 9.11 shows the results of the comparison between paratransit and fixed route travel times for the 30 trips for which fixed route itineraries were developed. For each Metro Plus ADA paratransit trip, the table shows the origin and destination. Addresses are rounded to the nearest 100 to maintain confidentiality. The actual departure time from the pickup location and arrival at the drop-off location are recorded in by the drivers using the MDT’s installed in the vehicles,

Table 9.11 – Comparison of Travel Times on Metro Plus ADA Paratransit Service vs. Fixed Route for Selected Trips, March 2009

ADA Paratransit Trip		Paratransit Travel Time		Fixed Route Equivalent				
Trip #	PU/DO Address (rounded to 100 block)	Actual PU/DO Times	Actual Ride Time (mins)	Itinerary (routes/transfers)	On-Board Time (mins)	Walk/Wait Time	Total FR Travel Time	Paratransit Travel Time – FR Travel Time (mins)
1	900 Jennings St, Bethlehem 500 N 15 <sup>th</sup> St, Allentown	15:18 18:37	199	B, A, & J	100	11	111	88
2	2400 Brodhead Rd, Bethlehem 800 E. 8th St, Bethlehem	10:26 13:15	169	S & F	40	23	63	106
3	100 S Commerce Way, Hanover Township 1400 Hedgerow Dr, Forks Township	14:21 17:02	161	S& E	90	19	109	52
4	7700 Cross Creek Cir, Upper Macungie 2300 Avenue A, Bethlehem	6:45 9:20	155	3 & H	80	13	93	62
5	500 W Tilghman St, Allentown 700 W Chew St, Allentown	7:33 10:04	151	D	10	9	19	132
6	300 W Spruce St, Bethlehem 1300 S 9 <sup>th</sup> St., Allentown	14:32 16:52	140	G & B	50	9	59	81
7	1300 Stefko Blvd, Bethlehem 1900 W Allen St, Allentown	15:00 17:03	123	B & E & J	75	7	82	41
8	1900 Lehigh St, Allentown 2900 Keystone St, Bethlehem Township	15:11 17:12	119	D & G & B	55	9	64	55
9	100 W Nesquehoning St, Easton 300 Spruce St Bethlehem	6:51 8:39	108	E & P	65	9	74	34
10	1700 S Church St, Allentown 700 W Chew St, Allentown	8:17 9:58	101	G & J	35	9	44	57
11	600 N Godfrey St, Allentown 2400 Broadhead Rd, Bethlehem	7:00 8:32	92	E & S	50	7	57	35
12	800 Ostrum St, Fountain Hill 300 Elm St, Allentown	16:06 17:27	81	B & A	45	13	58	23
13	1300 W Allen St, Allentown 100 Linden St, Allentown	8:38 9:35	57	J & E	25	7	32	25
14	1 Main St, Walnutport 3500 High Point Blvd, Hanover Township	6:44 8:56	132	W & A & F	115	11	126	6

ADA Paratransit Trip		Paratransit Travel Time		Fixed Route Equivalent				
Trip #	PU/DO Address (rounded to 100 block)	Actual PU/DO Times	Actual Ride Time (mins)	Itinerary (routes/transfers)	On-Board Time (mins)	Walk/Wait Time	Total FR Travel Time	Paratransit Travel Time – FR Travel Time (mins)
15	6500 Snowdrift Rd, Upper Macungie 300 Mauch Chunk Rd, Nazareth	15:29 17:34	125	2 & A & S	110	9	119	6
16	400 W Tilghman St, Allentown 1900 Lehigh St, Allentown	7:34 8:21	47	D	25	9	34	13
17	1400 Hamilton St, Allentown 1500 Hanover St, Allentown	6:49 7:32	43	H & E	20	7	27	16
18	3500 High Point Rd, Hanover Township 900 Cattell St, Easton	14:40 16:41	121	F & e	110	11	121	0
19	1500 Hanover Ave, Allentown 1 Main St, Walnutport	14:10 15:45	95	E & W	100	5	105	-10
20	1900 Lehigh St, Allentown 1500 Butternut Ln, Lower Macungie	15:28 16:52	84	D & 3	90	11	101	-17
21	1 Moore Dr, Palmer Township 300 Spruce St, Bethlehem	7:24 8:41	77	S & G	105	23	128	-51
22	2800 Golf Cir, Lower Macungie 1000 Jennings St, Bethlehem	7:10 8:24	74	D & G & B	115	-21	136	-62
23	1400 Krocks Rd, Lower Macungie 2300 Avenue A , Bethlehem	8:06 9:15	69	3 & D & 1	85	21	106	-21
24	900 Monroe St, Freemansburg 100 S Commerce Way, Hanover Township	8:07 9:02	55	B & S	80	11	91	-36
25	2200 Hanover Ave, Allentown 600 Chew St, Allentown	16:08 17:01	53	E & D	40	7	47	6
26	1700 Catasauqua Rd, Hanover Township 600 St John St, Allentown	15:30 16:20	50	F & H & J	50	7	57	-7
27	2900 Lindberg Ave, Salisbury Township 2300 Avenue A, Bethlehem	8:29 9:18	40	K & 1	65	11	76	-27
28	500 Pawnee St, Bethlehem 100 Commerce Way, Hanover Township	8:21 9:02	41	B & S	55	7	62	-21
29	1500 Hanover Ave, Allentown 2100 Highland St, Allentown	13:37 14:16	39	A	35	7	42	-3

ADA Paratransit Trip		Paratransit Travel Time		Fixed Route Equivalent				
Trip #	PU/DO Address (rounded to 100 block)	Actual PU/DO Times	Actual Ride Time (mins)	Itinerary (routes/transfers)	On-Board Time (mins)	Walk/Wait Time	Total FR Travel Time	Paratransit Travel Time – FR Travel Time (mins)
30	1 Front St, Coplay 400 S 15 <sup>th</sup> St, Allentown	12:04 12:41	37	1 & L	115	7	122	-85

and the actual total paratransit travel time. Table 9.11 then shows the fixed routes that would be used to connect the same origin and destination, the number of transfers involved, a calculation of travel time on board the buses, an estimate of walking time to the bus stops, and a calculation of total fixed route travel time. For purposes of determining the fixed route itinerary a departure time closest to the scheduled pickup time was used as a starting time. For purposes of this analysis, any paratransit trip that had a ride time less than the fixed route ride time plus 20 minutes was considered to be comparable in length.

Out of the 30 trips reviewed, 13 (43 percent) had travel times that were more than 20 minutes longer than comparable fixed route service. The remaining 17 trips (57 percent) had travel times less than 20 minutes longer than comparable fixed route itineraries. Based on this analysis of 30 trips, it appears that LANTA has a significant number of trips with ride times in excess of comparable fixed route travel times. Additional analysis would be needed to understand whether there is a pattern or practice of long travel times based on time of day, locations of origin/destination pairs, or other factors.

## 9.7 Findings

1. LANTA considers a drop-off to be on time if it is made no more than 15 minutes after the negotiated pickup time. All early drop-offs are considered acceptable, regardless of how early before the requested drop-off time. This is not appropriate because very early drop-offs are extremely inconvenient and can be hazardous for many paratransit riders. In addition, there is no performance standard for drop-offs.
2. The travel time standard for Metro Plus is twice the amount of time that an equivalent trip would take on the LANTA fixed route system, including transfer time. There is no standard for the maximum overall trip time or the percentage of trips that may exceed such a maximum time. The LANTA travel time policy is inconsistent with the requirement that ADA complementary paratransit service be comparable to fixed route service 49 CFR §37.121, and the long trip times constitute a capacity constraint.
3. Review team interviews with 10 ECC Metro Plus drivers found some variation in the drivers' understanding of the on-time pickup window.
4. Reservations are accepted until 4 p.m. The scheduling process for the next day is completed by early afternoon and callbacks begin as early as 2 p.m. This means that ECC schedulers may be adjusting schedules after CSRs have called riders with their pickup times.
5. Some subscription trips that are not assigned to or locked on a run and subsequently moved during the batching process do not appear on the call-back sheets used by CSRs to notify passengers of their pickup times.
6. During the scheduling process there are instances where scheduled times are changed without prior notification to, or consent from the customer.
7. Although the scheduling process was well documented, the process does not include an ECC review of completed schedules.
8. LANTA's on-time performance for pickups was 68 percent for ADA trips in March 2009 and 65.6 percent for January to March 2009. This falls substantially short of LANTA's on-time pickup performance standard of 90 percent. Late pickups comprised 22.8 percent of all

pickups. This level of performance is an “operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons...” which is inconsistent with 49 CFR § 37.131(f)(3).

9. Based on LANTA’s standard for on-time drop-offs, on-time performance for ADA trips during January to March 2009 was 72.5 percent, i.e., 27.5 percent of trips were later than the rider’s requested appointment time. This level of performance is an “operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons...” and inconsistent with § 37.131(f)(3). If one applied a stricter 30-minute window for on-time drop-offs (-15 minutes to +15 minutes), then on-time performance for drop-offs would be 52.0 percent.
10. LANTA stated that use of the “raw” data from TransView underestimates the actual on-time performance for Metro Plus pickups. Based on LANTA’s analysis, the review team adjusted the on-time performance of pickups for ADA trips for January to March 2009 by 3.9 percent, to 69.5 percent. This adjusted on-time performance for pickups is still well below LANTA’s standard of 90 percent. In addition, this level of performance is an “operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons...” and is inconsistent with § 37.131(f)(3)(i)(A).
11. Based on an additional analysis of 30 long trips, 57 percent had travel times that were in excess of fixed route travel times for the same origin/destination pairs. Based on this analysis, it appears that LANTA has a significant number of trips with ride times in excess of comparable fixed route travel times.

## 9.8 Recommendations

1. In consultation with the disability community, establish a standard for on-time drop-offs and significantly late drop offs for Metro Plus ADA service and regularly measure on-time drop-off performance.
2. In establishing an on-time drop-off window, consider avoiding drop-offs that are too early. ADA complementary paratransit services often use on-time drop-offs windows, such as 30 minutes before the appointment time, in order to ensure on-time arrivals. At the same time, reconsider the practice of CSRs entering drop-offs 15 minutes earlier than the customer’s requested time.
3. Establish a travel time standard that is consistent with the DOT ADA regulations and is based on comparability with fixed route travel times. FTA recommends avoiding standards that are based on general comparisons to fixed route travel times, such as 1.5 times or 2 times fixed route travel time would not be appropriate for very short or very long paratransit trips.
4. Monitor actual paratransit travel times and compare them to the fixed route travel time to ensure that service performs within that standard.
5. Retrain Metro Plus drivers so ensure that they understand the pickup window.
6. Review the current workload of dispatchers, especially during peak hours, to ensure that they are able to monitor their assigned runs and respond to any operational problems.
7. Adjust the timing of the scheduling process so that the completion of the scheduling process occurs *after* reservations for the next day have ended. This will ensure that all trip requests

are optimized through the use of the batch scheduler and may reduce the number of trips on Run 0.

8. Make call-backs to confirm trip times for subscription trips that may have to be adjusted during the scheduling process.
9. Include a review of the schedules for reasonableness as part of the scheduling process. A review of the schedules prior to distributing them to drivers may result in more comprehensive changes to driver schedules and would also allow the morning dispatcher to concentrate more fully on managing the runs in service.
10. Review capacity for Metro Plus service. Additional drivers and vehicles may be needed to ensure sufficient capacity to meet service standards.
11. In light of the on-time performance for pickups and the on-time performance for drop-offs for ADA trips, ensure that ECC is dedicating sufficient resources to provide a greater level of service to its ADA riders. Consider a review of ECC's scheduling and dispatching procedures to determine whether these functions could be improved to achieve better on-time performance.
12. Review more thoroughly the on-time statistics compiled by ECC to ensure that any adjustments made in the analysis are appropriate.
13. Review a sample of paratransit trips and compare the ride times to comparable fixed route ride times on a regular basis. Trips that consistently exceed the fixed route travel time should be evaluated and rescheduled to ensure comparability to fixed route ride times for similar trips. Determine if there is a pattern of long trips for particular riders, during particular times of day, to particular geographic areas, even if overall performance is good.



## 10 Resources

Section 37.131(f) of the DOT ADA regulations prohibits operational patterns or practices that significantly limit the availability of service to ADA paratransit eligible riders. The review team examined the resources made available by LANTA to provide ADA complementary paratransit service. This information included:

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

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

### 10.1 Customer Comments

Most customers and agency representatives interviewed prior to the review liked the drivers and said they were good, although two riders raised concerns about whether drivers were properly securing wheelchairs. One passenger suggested the need for sensitivity training for drivers. All but two of the respondents felt that the vehicles were clean and in good repair. One respondent felt the vehicles were too old.

### 10.2 Driver Interviews

Most drivers said the training was “very good” and included a strong emphasis on safety and defensive driving skills as well as wheelchair securement and map reading. Most reported having one week of classroom and one week of behind-the-wheel training, with additional training time as needed. Most said the training prepared them well for their jobs and that being paired with an experienced driver was a helpful experience. Most said nothing was missing from training although several commented that additional training on the MDTs would be helpful as would more training on how to manage and run schedules, which can get busy. Retraining mostly occurs as part of the biweekly safety meetings, although several drivers stated that if they ask for help they can always get it. Additional training is provided through random ride-alongs with the trainer or a more senior driver observing.

Drivers are required to clean the inside of their own vehicles and most said they clean it daily, picking up papers and sweeping out the vehicle. Exteriors are washed weekly. Drivers are typically assigned the same vehicle each day, and they say that helps to ensure the vehicles are kept cleaner.

### 10.3 Vehicle Fleet and Vehicle Availability

At the time of the review team’s visit, the paratransit fleet consisted of 108 Metro Plus vehicles owned by LANTA. The vehicle fleet information is shown in Table 10.1. A sample of five vehicles from different model years were inspected using the Bus and Van Specifications (ADA)

Checklist, which is presented in Attachment L. The vehicles that were inspected included # 2209, #2305, #2401, #2704, and #2811. Two of the vehicles (#2209 and #2401) did not have overhead handrails, which are required for vehicles longer than 22 feet. Otherwise, the vehicles met the ADA-related requirements (49 CFR Part 38) which are included in the inspection checklist. All observed vehicles were clean and appeared to be in very good condition.

**Table 10.1 – Metro Plus Vehicle Fleet Information**

<b>Model Year</b>	<b>Number</b>	<b>Seating Capacity</b>	<b>Wheelchair Capacity</b>	<b>Vehicle Make/Model</b>
2002	20	12	2-5	Ford E-450 Goshen
2003	20	12	2-5	Ford E-450 Goshen
2004	20	12	2-5	Ford E-450 Goshen
2005	20	12	2-5	Ford E-450 Goshen
2007	10	12	2-5	Chevrolet Starcraft
2008	18	12	2-5	Chevrolet Starcraft

All 108 vehicles are equipped with MDTs and automatic vehicle location (AVL) systems.

The fleet of 108 for a peak pullout requirement of up to 105 runs does not provide sufficient spare capacity for the service, especially given the size of the service area. In early 2009, ECC acquired 10 minivans to supplement service, primarily for medical trips outside the two-county service area, for MATP clients. Prior to that time Metro Plus vehicles were used to perform those trips. The use of Metro Plus vehicles for this service reduced the ability of ECC to meet its peak pull out requirements for complementary paratransit service. The purchase and use of the 10 minivans has helped to alleviate the problem of meeting peak pull out requirements. Nonetheless, dispatchers and schedulers stated that there were still times when no spare vehicles were available because of preventive maintenance or other needed repairs. As a result, if drivers are added to accommodate rising demand, the fleet will also need to be enlarged.

## **10.4 Staffing and Training**

As is typical of most transit systems that utilize contractors, driver training is the responsibility of the contractor, and all new drivers receive training by ECC at the time they are hired. The review team found the ECC training materials to appropriately address ADA topics and customer service. The ECC training program includes five days of classroom training and additional five days of behind the wheel training to ensure proficiency. Classroom instructions include employee orientation/human resources, driver responsibilities, pre-trip inspections and procedures, introduction to on-the-road training, passenger assistance, wheelchair securement, loading and unloading mobility aids, driving skills, understanding manifests, mapping, road training, safety, blood-borne pathogens, MDT operations, understanding dispatch, maintenance “shop talk,” road training, the Smith system of defensive driving, road course, and a written review. Based on driver interviews and a review of the training materials, the training program appears to train Metro Plus drivers to proficiency in serving riders.

At the time of the review, the newest CSR at the call center had been hired in May 2008. The Call Center Supervisor stated that she personally trains each new CSR and informally monitors each person on her staff. A three-ring binder in the call center contains a script for reservations

calls, although the supervisor indicated that it is not often used for reference. Based on observations of reservations calls, the reservations staff appeared to be well-trained.

## 10.5 Planning, Budgeting, and Funding

The review team met with LANTA’s senior management staff to review the budgeting process for Metro Plus. LANTA’s fiscal year is from July to June. The budget is provided to the Board of Directors for approval each year and until FY 2008 had recorded excess revenues. To generate additional revenue to cover the operating deficit in FY 2008, in October 2008 fares (full trip costs) were increased by 24 percent to \$22.15. Overall, staff has reported that operating revenues for LANTA have been doing well and the transit agency has not had budget issues relative to other peer agencies. Budgetary constraints do not necessarily limit LANTA’s ability to provide ADA complementary paratransit service that meets the requirements of the DOT ADA regulations.

The total Metro Plus FY 2009 operating budget for all programs was projected at the time of the review to be \$10,242,680, an increase of 14 percent from \$8,984,689 in FY 2008. Over 90 percent of the Metro Plus operating budget is allocated to purchased transportation—primarily Easton Coach. Table 10.2 presents the Metro Plus operating budgets for FY 2006 to FY 2009. The “purchased transportation” items in the budget refer to the contract with ECC.

Based on the analysis of on-time performance and trip lengths presented in Section 9 of this report, it appears that LANTA may need to devote additional resources to Metro Plus.

**Table 10.2 – FY 2006 to FY 2009 Metro Plus Operating Budgets**

<b>Operating Expense</b>	<b>FY 2006</b>	<b>FY 2007</b>	<b>FY 2008</b>	<b>FY 2009 (Budgeted)</b>
Salaries & Wages	\$159,268	\$150,800	\$148,287	\$148,287
Fringe Benefits	111,309	114,636	117,944	123,514
Outside Services	55,255	114,500	139,758	155,744
Materials and Supplies	22,000	26,000	21,733	16,457
Utilities	9,100	9,100	9,100	9,660
Insurance	3,360	3,360	3,360	3,360
Purchased Transportation	8,192,021			
Metro Plus		8,022,169	7,968,594	9,024,490
Out of County Service			260,000	249,100
Pass Through Contracts		259,800	293,519	490,114
Overhead Charges (facilities)	20,000	20,000	20,000	20,004
Miscellaneous	9,500	7,350	2,375	1,950
<b>Total Operating Budget</b>	<b>\$8,581,812</b>	<b>\$8,727,715</b>	<b>\$8,984,669</b>	<b>\$10,242,680</b>
<b>Net Surplus (Loss)</b>	<b>\$175,974</b>	<b>\$93,624</b>	<b>(\$66,058)</b>	<b>\$665</b>

## Capital Planning

On average, LANTA has acquired about 20 paratransit vehicles per year. Additional capital acquisitions include the MDTs and related equipment. Table 10.3 shows capital expenditures from FY 2006 through FY 2009.

**Table 10.3 – LANTA’s Capital Budget**

FY 2006	\$1,120,000
FY 2007	\$1,000,000
FY 2008	\$1,100,000
FY 2009	\$1,300,000

Capital purchases have not been viewed as constrained, according to LANTA upper management. At the time of the review, LANTA was operating with few spare vehicles and sometimes there were no spares.

## 10.6 Ridership

Table 10.4 shows ADA paratransit ridership figures for Metro Plus for FY 2006 through FY 2008. ADA ridership increased by 6 percent from FY 2007 to FY 2008. All Metro Plus riders aged 65 and older who are qualified for ADA paratransit service provided transportation under the Pennsylvania’s Lottery-sponsored Shared Ride Program and are not counted in the ADA paratransit totals.

**Table 10.4 – Metro Plus ADA Ridership**

<b>Fiscal Year</b>	<b>ADA Ridership (excludes any rider qualified for Shared Ride Program)</b>
FY 2006	188,521
FY 2007	188,085
FY 2008	200,013

## Projected Demand for Service

The review team used a recently developed national ADA paratransit ridership model to estimate the predicted ADA paratransit ridership in the LANTA service area to determine how this level of ridership compared with other areas. The national model, developed by the Transportation Cooperative Research Program (TCRP) and detailed in *TCRP Report 119, Improving ADA Complementary Paratransit Demand Estimation*, used data from 28 representative transit systems across the country to model ADA paratransit demand. The model estimates ADA paratransit demand based on the population of the service area, the base fare charged, the percentage of the population with household incomes below the poverty level, the effective window used to determine on-time performance, the percentage of applicants found conditionally eligible, and whether conditional eligibility is used to do trip-by-trip eligibility in operations.

To estimate demand for the LANTA Metro Plus service area using this national model, Table 10.5 presents the data used for the model.

Table 10.5 – Input Data for Paratransit Demand Model

<b>ADA service area population (2000 Census)</b>	389,000
<b>Base fare for ADA paratransit (dollars)</b>	\$3.35
<b>Percent of applicants for ADA paratransit eligibility found conditionally eligible</b>	0
<b>Conditional trip determination</b>	0
<b>Percent of the population in the ADA service area in households with 1999-2000 income below the poverty line (US Census data)</b>	8.7
<b>Effective on-time window for ADA paratransit (minutes)</b>	30

Because Metro Plus generally grants full eligibility to most applicants, a conditional eligibility rate of zero was used. In addition, the model was set to reflect that Metro Plus does not conduct trip-by-trip eligibility for ADA paratransit service.

Using these factors, the TCRP model estimated demand for ADA paratransit service in the LANTA Metro Plus service area to be 235,221 annual one-way trips, which is approximately 0.51 annual paratransit trips per capita.

The TCRP model also gives a range to reflect the upper and lower 95 percent confidence limits of the model. As shown in Table 10.5, the range is from 128,015 trips per year the lower 95 percent confidence limit) to 432,208 per year (the upper 95 percent confidence limit. The FY 2008 Metro Plus ADA paratransit ridership was 15 percent below the ridership predicted by the model.

Table 10.5 – Calculation of Potential Demand for LANTA’s ADA Paratransit Service

	<b>Annual Ridership</b>	<b>Trips per Capita</b>
<b>Predicted Annual Ridership</b>	235,221	
<b>Predicted Annual Ridership per capita</b>		0.60
<i>Confidence Intervals</i>		
<b>Upper 95% confidence limit</b>	432,208	1.11
<b>Upper 90% confidence limit</b>	389,265	1.00
<b>Lower 90% confidence limit</b>	142,137	0.37
<b>Lower 95% confidence limit</b>	128,015	0.33
<b>Metro Plus ADA Ridership, 12 months: July 2007-June 2008</b>	200,013	0.51

At the time of the review, LANTA did not count any of the Metro Plus trips taken by riders 65 years and older as ADA trips. If those trips were included in the ADA ridership, then it is likely that the LANTA figure would exceed the predicted annual ridership (235,221: Row 1 of Table 10.5).

## 10.7 Findings

1. The Metro Plus fleet consists of 108 minibuses using Ford and Chevrolet chassis. This fleet of 108 vehicles for a maximum pullout of 105 vehicles does not allow for sufficient spare capacity, and sometimes there are no spares available during peak service. Particularly if drivers are added to accommodate rising demand, the fleet will need to be enlarged.
2. LANTA's Metro Plus FY 2009 operating budget was projected to increase by 14 percent compared to FY 2008. Over 90 percent of the operating budget is allocated to purchased transportation, primarily Easton Coach. However, based on the poor on-time performance and long trip lengths—as described in Section 9—it appears that LANTA may need to devote additional resources to Metro Plus.
3. Based on a Transit Cooperative Research Program (TCRP) model for paratransit demand estimation, LANTA service area is estimated to have an annual paratransit demand of 235,221 trips. Ridership classified by LANTA as ADA trips was 15 percent below the ridership predicted by the TCRP model. However, if the trips taken by ADA-eligible riders 65 years and older—classified by LANTA as Shared Ride trips—were included in the ADA ridership, it is likely that the LANTA figure would exceed the figure predicted by the TCRP model. Improvement in on-time performance and reduction in the proportion of long trips would likely increase paratransit usage.

## 10.8 Recommendations

1. LANTA should consider increasing the spares ratio for its Metro Plus vehicle fleet. In addition, it should increase the Metro Plus fleet size further to accommodate likely continuing increases in service demand.
2. Seek more budgetary resources to improve the on-time performance and large portion of long trips experienced by its riders.

**Attachment A**

**LANTA Response to Draft Report**



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December 9, 2011

Ms. Britney Berry  
Federal Transit Administration  
Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590

Ms. Berry,

Attached is the response LANTA has prepared in response to the Draft Report for the FTA ADA Review, 2009. In addition to the response document, we are sending along documents that support various comments and clarifications as detailed which we have organized by paragraph number.

As an overall statement, LANTA continues to disagree with the finding on the LANTaVan paratransit system's 'on-time' performance. As the Authority has explained in previous correspondence and in response to the original FTA ADA Review 2009 draft report, the statistical findings on performance continue to be based on analysis of 'raw' data. As our Board and Staff have concluded in the past, such analysis will not report out accurate data. We have developed, in consultation with an independent auditor, a procedure that utilizes a sampling and data clean-up method that provides much more reliable data on system performance. This is an issue that LANTA believes needs to be resolved before this draft report is accepted as final.

We remain prepared to review this information with you.

Many thanks Ms. Berry for your help and continuing patience in this process,

A handwritten signature in blue ink, appearing to read "D. Meyers", is written over a light blue horizontal line.

Denis Meyers  
LANTA  
1060 Lehigh St  
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Up to Easton Coach Company



Paratransit Complaints  
Passenger Incidents

Select a View

Passenger Incident Reports

All Items

[New Item](#) | [Filter](#) | [Edit in Datasheet](#)

To Be Investigated

Pending Resolution

Pending Review

Pending Second Review

Calendar Of Incidents

Last Month

Actions

Alert me

Export to spreadsheet

Modify settings and columns

ID	Received Date	Incident	Passenger ID	Caller First Name	Caller Last Name	Date of Incident	Complaint Types	Resolution	Initial Resolution Date
1032	9/13/2011	He was scheduled for a 9:25am pick up for physical Therapy at 9:55am the van still had not shown up so he canceled his appointment because he would not make it on time	54968	Ronald	Walter	9/13/2011	Late Arrival	Driver was running late moved the trip to another driver that was in the area at this time the client had canceled his ride.	9/14/2011
1033	9/13/2011	Ivette's pu was 8:45am for a 9:00am appt. Ivette called at 8:50am and again at 9:10am van still not there. EC dispatch said van was in upper sacon and was on the way. Van was late EC needs to correct this problem. Ivette called again supposed to be picked up to go to cemetary at 10:30am and no van by 11:00am Got to her first appointment at	11823	Ivette	Ortiz	9/13/2011	Late Pickup	This trip was booked incorrectly by call taker did not have enough travel time which had the driver running late.	9/13/2011

1034	9/13/2011	10:00am She left a message that she was scheduled for a 9:20am pick up for today for a doctor appointment at 10:30am the van still had not shown up and she missed her appointment	57353	Joan	Griffin	9/13/2011	Late Arrival; Late Pickup	Client had a 3 legged trip, First trip was a scheduling error the trip shouldnt of been on that run, driver missed it on mdt. Dispatch then worked out her next two trips by rescheduling same day.	9/15/2011
1035	9/22/2011	I am employed NA by Northampton County Housing Authority. Ms Dorothy Peters had an appointment at our office at 10am and she was left to sit here forever! She has been sitting here since 11am and is still here and its 3:28pm Our office closes at 4pm. Everyone in our office has called the dispatcher and they couldnt help us. They kept saying they dont know when the bus is coming to pick her up. This is absolutely unacceptable and ridiculous. How would ou like it if was your 80 year		Patricia	Pados	9/21/2011	Bus Did Not Show; Late Pickup	Client was marked a no show on the return trip, When they called looking for the bus at 12:30pm the trip was rebooked and had to find another driver for the client, anothe driver went over and was marked a no show a second time at 2:25pm, third bus went out and was marked a no show a third time at 4:39pm	9/26/2011

1036	9/22/2011	old Mother stranded at the housing authorith office? Dorothy Peters NA has been sitting outside our office for 4 hours, she is crying and wants to go home. This is not the first time this has happened to the people that need to make this trip to our office. I guess she should be happy its a nice day and not 10 degrees outside. No one can give a straight answer to why this keeps happening. How would you feel of it was your grandma?	NA	Wendy	McConnell	9/21/2011	Bus Did Not Show; Late Pickup	9/26/2011
1037	9/22/2011	Client on Van 4 hours please call	40238	Nathalie	Rodriquez	9/20/2011	Trip Length	Client's family was in contact with dispatch the complete time, she had numerous calls explaining it was a new driver, the driver went out of order on the manifest then got lost 9/23/2011
1038	9/22/2011	Oneika stated that she missed an appointment on 9/20	56029	Onekia	Stewart	9/20/2011	Bus Did Not Show	This was a trip that dispatch had a hard time covereing, client canceled 9/26/2011

1039	9/22/2011	Kyara missed an appointment on 09/22/11 because the bus never showed	55743	Kyara	Cotton	9/22/2011	Bus Did Not Show; Late Arrival	out the trip missed appointment trip never went over MDT when client called in the dispatch called the driver and resent the trip over when the driver got to the clients house she no showed.	9/26/2011
1040	9/26/2011	I was picked up late. When I got to the Doctor they would not see me. I waited over an hour to get picked up. Please help me I have a pace maker and ambulatory problems	56379	Charlie	Castillo	9/22/2011	Late Pickup	trip was booked incorrectly never had enough travel time allotted for pick up and travel, client was picked up at his regular scheduled pick up time.	9/28/2011
1041	9/26/2011	Our pick time 2:15 it was 3:00 we walked home. This is the 50th time this has happened please help me	53755	Leonor	Ramos	9/21/2011	Bus Did Not Show; Late Arrival	Trip was not on MDT, dispatch moved the trip to another driver when the driver arrived client could not be found and marked a no show	9/28/2011
1042	9/26/2011	I was waiting in the van for 2 hours also another man was also waiting he is diabetic	57436	Dorothy	Bond	9/22/2011	Trip Length	Dorothy was picked up at 12:24 and dropped at 1:45pm, her return trip was 3:55 and dropped off at 4:22pm she wasnt on the bus for over 2	9/28/2011

								hours on either trips it was the correct time for the distance she went with another passenger on the bus	
1043	9/29/2011	Pick up time 7:00am pick up its 8:20 and no van my appointment is for 8:15am Im outside by myself i have no key to my house. They said the van is running late No driver at this point Im in a wc this not the first time	49435	Donna	Lang	9/27/2011	Late Pickup	last minute book off, asked the client if she could reschedule for same day we adjusted her times and gave her a trip.	9/29/2011
1044	9/28/2011	I was at the intersection of Chestnut St and Cedar Crest Blvd in emmaus I on CCB going to make a right onto Chestnut St when the LantaVan completely cut me off. It was not his turn to go, the cars making a rt hand turn onto chestnut have the right away there were cars in front and back of me and so i was not turning from a stop I was going at least	NA	Elizabeth	Kern	9/22/2011	Careless Driving / Comfort	Driver was brought in and spoken with from a member of our management staff	9/28/2011

1045	9/30/2011	Center manger NA told LC Aging that the afternoon driver was not the regular driver and when he came to take Berry home he had parked the bus on the opposite of the building. The manager asked that he bring the bus over to the other side of the building and the driver refused and said I am already parked and that is where the bus is. The manager had to help Betty to walk around the building to the bus the driver would not help and did not offer to help Betty to the bus.	Ann	Okeefe	9/28/2011	Driver Attitude / Conduct	This was referred to the driver Manager, driver was spoken with	9/30/2011	
1046	10/4/2011	The Coopersburg Center Manager called Lehigh County of Aging at 127pm stating the bus was late picking up the ladies and had just arrived. The pick up time for the ladies is 1:00pm	NA	Ann	O'Keefe	10/3/2011	Late Pickup	Driver came out of Allentown got stuck in traffic on the way back to Coopersburg GPS shows the bus arrived at 1:20pm.	10/6/2011

1047	10/6/2011	Mr. Diaz PU time was 8:10am at 8:20am ECC (Ana) said 10 minutes- Mr. Diaz needs to be at his appointment 15 minutes ahead of his scheduled appointment (9:15am) Mr Diaz wants to know why his pick ups are continually late	56723	Alfonso	Diaz	10/5/2011	Late Pickup	Clients pick up 10/6/2011 was in the middle of a agency going all in the same direction for the shared ride system. Client was dropped in time for his appointment at 9:15am
1048	10/7/2011	She said she left a message that she uses the van with it willy nilly picks her up on time. She said she had an 8:30am appointment today but her driver called off sick-she said that ECC should have other drivers ready to fill in. She also said the services should be run like you actually care about the passengers. She wants to know what is going on and why the van routinely shows up for her at a time when she should already be at her appointment. She said ECC pushes her	43503	Kathleen	Zechman	10/5/2011	Late Pickup	Dispatch had a 10/7/2011 hard time covering the run with a last minute call off. Bus arrived at her residence at 9:00am when she no showed at the door. (GPS tracking attached)

		around like she cant go anything about it but things can be done. She said she was going to call penndot as well.							
1049	10/10/2011	Sharon had appt Monday 10/03/11 Pu time of 850am for a 9:30am Drs appointment_ Van came at 9:25am (late for the doctor) on Wed 10/5/11 PU time of 9:45am van came at 11:15am-- Thur 10/06/11 PU time of 7:50am van came at 9:20am late for a 9:00am appointment. 3 days in a row not acceptable please take care of this.	37621	Sharon	Ritchey	10/3/2011	Late Pickup	These three trips were complete service failures on our end where dispatch unsuccessfully covered the trips in the morning.	10/12/2011
1050	10/14/2011	Charles stated that Dorothy goes to Lifepath and that the van picks her up late. She started using the service this week and the van was late both days (8:45 and 9:35) Charles stated that was unacceptable and needs to	58268	Dorothy	Boyle	10/12/2011	Late Pickup	Dorothy was assigned a regular driver to a agency. This will correct this problem and will have a consistent ride time now.	10/14/2011



1051	10/12/2011	be corrected Joseph called 3 times between 6:25am and 7:00am Van did not show for 5:50 pick up	3 56911	Joseph	Luther	10/11/2011	Bus Did Not Show; Late Pickup	Driver had a change in run for that morning and a change was made to the run which put the original start time back with moving the trips back to that run. Dispatch unaware of the change until clients started calling in. Dispatch was aware driver had later start time for that day and was not looking for her.	10/13/2011
1052	10/13/2011	Sharon stated that Lawrence was picked up at 2:30p on 10/12/11 but he did not get home until after 6:00pm she siad that is unacceptable and abusive She wants to know what is going on	291	Lawrence	Davies	10/12/2011	Scheduling; Trip Length	Driver had three other people from a agency going into the Easton area held the driver with the drop off times.	10/17/2011
1053	10/17/2011	Mr. Brittain's pu was 715am for an 8:30am appt. Van did not show- Mr. Brittain called Ec and was told his trip was canceled out. Said the Driver was in Bethlehem and	55638	Brian	Brittain	10/13/2011	Bus Did Not Show; Late Pickup	Clients original trip was canceled out when client called dispatch they rebooked the trip, original driver was not in the area and had to get another bus. Clients trip was put	10/10/2011

		having a hard time. Mr Brittain said he waited until 8:30 to call and wants to know why no one called him to let him know his trip canceled out. he said the van is always over an hour late. He had to cancel his appointment						back in for a 10am pickup. Client then canceled the trip.	
1054	10/13/2011	PU was suppose to be 9:15am it was 10:45 no van. We Canceled We never made it to the funeral So wrong	54503	Matthew	Harrison	10/10/2011	Bus Did Not Show; Late Pickup	Original pick up time was 9:15am never went over the MDT when the client called in, dispatch radioed the driver, driver was not in the area, had to cover with another driver. Trip went to second driver for a 10:15am pick up client canceled by 10:38am. This was a trip failure on our end	10/17/2011
1055	10/14/2011	Jacqueline Darling had 2 trips scheduled 1st trip to St Lukes where she had blood taken. When the van came for her second trip Jacqueline felt sick and felt she was going to throw up and asked to be taken	48448	Jacqueline	Darling	10/13/2011	* Other Safety Issue	Jacqueline was requesting a direct trip home this is where Dispatch said no there were two other pick ups in the area that were on that bus. She kept saying how sick she was driver called	10/17/2011

			home instead. Dispatch said NO give her a bucket or plastic bag. After about 30 mins the dispatcher said take her home. Jacqueline also said that EC called an ambulance for her.						into dispatch again and safety got on radio and stated to call EMS if she was that sick. So EMS was dispatched out and client refused treatment.
1056	10/19/2011	NA	Call came in Oct 18th @ 5:42pm Bus ran him off the road as he was riding his bike. Bike was damaged and he was almost killed. Stated he was going to make police report	Christopher	Moore	10/18/2011	* Other Safety Issue	Investigated by Fred Parris response was done by email to Kelly	10/19/2011
1057	10/19/2011	NA	The LANtaVan driver ran the stop sign at the corner of Mohapac Drive and Chenango Drive in East Allen Township at approx 7:30am The driver did not even slow down as he/she approached the stop sign on Mahopac Drive a vehicle approaching on Chenango Drive. Vehicles on Chenango Drive do not have to stop sign at the corner.	anonymous	anonymous	10/18/2011	* Other Safety Issue	Fred Parris called the driver in and spoke with him, Driver admitted to a rolling stop. Verbal warning	10/19/2011

1058	10/19/2011	LANta Van driver dropped off passenger. driver then urinated at complaint dumpster	na	Robert	Fox	10/18/2011	* Other Safety Issue	Driver was pulled off the road and he admitted to it and was terminated	10/19/2011
1059	10/19/2011	Sent in 5 pages of complaints sent back complaint stating it was false.	57436	Dorothy	Bond	10/18/2011	Late Arrival; Trip Length	Kelly, I went to do further investigations and called Dorothy 3 times and left messages. Calling another client who travels with Dorothy to let her know about her trip she informed me that Dorothy was terminally Ill and moved with her daughter. At this time I will put this complaint on hold.	10/20/2011
1060	10/24/2011	My Pick up time was at 2:05pm they came for me at 4:30pm Please help me this is going on forever. I have been using Metro for years. They are always late. I get so many different drivers	47175	Katherine	Buck	10/20/2011	Late Arrival	Please see attached sheet for pick up times and drop off times. Katheline was picked up at 2:09pm and dropped off at 2:32pm	10/24/2011
1061	11/3/2011	Raisa attends Mercy Special Learning Center. Her pick up time was 4:00pm to go home. Dad called ECC at	47714	Raisa	Puhacz	10/25/2011	Late Pickup	I have printed out a copy of Transview the bus picked her up on the day in question at 3:05pm and dropped at her	11/3/2011

	4:30pm and was told the van was on the way- Van arrived at 4:45pm and said he had to drop off another client in before he took Raisa home, bc her ride had been canceled. Driver did finally agree to take Raisa home First arrived home @ 5:00pm						house at 3:45pm. I pulled up all moves on this trip and there were none. I also looked at the day prior and the day after (canceled).	
1062 9/1/2011	When I call EC 42042 They are always late for my pick up times. The excuse they give me is, You live in Bangor. Also they say your going all the way out to Cedar Crest? ANd they hang up on me. Please help I need to go to my Doc appointments. Please call me	Ann	Zona	10/25/2011	Late Pickup	I turned the complaint over to the scheduler who will follow up with Ms Zona. I did a review of all her trips she is 88% percent on time total of 54 trips with 4 late	11/1/2011	
1063 11/3/2011	I must complain that your bus 439 has exhaust that must be in violation of the emissions safety standards. I was directly behind this bus on Springhouse Rd and then	NA	Alaina	Minnich	11/2/2011	Vehicle Issues; * Other Safety Issue	I had the van pulled out of Service. The mechanics checked it and found a faulty engine sensor which was replaced that evening the bus is back in service	11/3/2011

Broadway in Allentown around 2pm today. I have bad asthma and I could not breathe in my own car. I unfortunately had to follow this bus for 10 minutes. Even with my windows closed I could feel this exhaust in my lungs. I hate to think that someone with even worse asthma or a young child could have a problem breathing in these fumes. The smoke was very dark coming out the back. I suggest that you have a mechanic look at this vehicle ASAP. My car still smells from this experience. Thank you

1064	11/3/2011	Metro Van was coming out of Cedar Crest College turning South Bound onto Cedar Crest Blvd and inched himself out blocking Nancy's way as she was heading North Bound into the college	NA	Nancy	Meyers	10/25/2011	Vehicle Issues	Driver was pulled into and spoke with by Safety	11/3/2011
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1065	11/14/2011	Female driver cut off a truck. The driver was eating potatoe chips and not paying attention	NA	Joseph	Nichol	11/14/2011	Careless Driving / Comfort	Fred reviewed complaint with Driver who does not recall the incident. No Drive Cam recorded	11/15/2011
1066	11/23/2011	I reserved metro plus bus for an eleven am appointment with my dentist at 21 and Walbert Ave. I was to be picked up at 10:30am and brought back at twelve noon. I waited from 10:15am to 11:20am and no bus showed up. I went back to my apartment and canceled my appointment and rescheduled. After I hung up the bus showed up but I told the driver I had to change plans Now my new appointment is Dec 6th. I hope the bus shows that day.	30601	Mary	Bruckner	11/18/2011	Bus Did Not Show	I did a play back of the bus on 11/18/11 and the driver was runnig 45 minutes behind. Driver was having problems with MDT so dispatch was unaware of where he was.	11/25/2011
1067	11/23/2011	Sabrina Stated that the van has been late for the last 2 weeks.for Nikki Weaver #49851	NA	Sabina	Quality Progressions	11/23/2011	Late Dropoff	I checked Nikki's trips for the last two weeks he had 2 trips were he got home later, Nikki did not have a direct	11/25/2011

								trip home either one of these days. He went with a group of people heading in the same direction, neither time was he on the bus for over a hour and half	
1068	11/25/2011	EC Van Always late to take me to Dialysis I have called to be picked up early and nothing has been done. Please help me with this I need to be on time for my Dialysis	56458	Edwin	Eckroth	11/22/2011	Late Arrival	I spoke with Scheduler for Dialysis and made an adjustment to his schedule by 15 minutes to get him there earlier. The times we had in for S/O matches what Dialysis sent over.	11/25/2011
1069	11/25/2011	Pick up time 8:15am Van did not show. Canceled trip. This is not the first time.	45931	Patricia	Martinez	11/21/2011	Bus Did Not Show	Driver was running about a hour late	11/25/2011
1070	11/25/2011	Steven's pick up time from the center is 12:30pm. The Center Manager called Lehigh County Aging at 1:00pm to state the bus had not arrived to pick-up Steven. Lehigh County Aging called Easton Coach Dispatch. Dispatch said the driver bus was running a little late.	NA	Ann	O'Keefe	11/18/2011	Late Arrival	On the drivers MDT the pick up time showed 1:10pm and the driver arrived at the center at 1:16pm. Computer moved the time when it was batched.	11/25/2011



		Lehigh County asked about how long and dispatch said shortly.							
		Easton Coach arrived at 1:25pm							
1071	11/21/2011	Lanta Van was to pick up Sarah at 8:15am for trip to church for her bus ride that she paid 58.00 to the church function bus trip. Van showed up at 8:55am to pick her up and she arrived at church at 9:13am and the bus left.	16108	Sarah	Hanna	11/17/2011	Late Arrival	Trip was assigned in the AM of that day, dispatch assigned it late, driver got to the house 5 minutes after being sent the trip. Client was late for her trip. This was a failure on the Dispatch team.	11/25/2011



Lehigh and Northampton Transportation Authority

1060 Lehigh Street, Allentown, PA 18103

Phone 610-435-4517 • Fax 610-435-6774

www.lantabus.com

November 28, 2011

Mr  
E

Dear Mr. ...

Your application for the LANtaVan Paratransit Service has been received and processed. You have also completed the \_\_\_\_\_ in-person physical and/or  cognitive testing as required. Through this process, it has been determined that, in accordance with the Americans with Disabilities Act, you:

- are not ADA eligible for public transportation services
- are conditionally eligible for public transportation services
- are always eligible for public transportation services

The reasons for the denial are: you use fixed route "all the time"  
successfully. You scored 100 on the FASTS test. That  
indicates that you can use the fixed route without  
difficulty.

The enclosed ADA eligibility information should help you to understand the eligibility process. If you wish to appeal this decision follow the enclosed appeals process.

Respectfully yours,

Kelly Ann Sokol  
Operations Supervisor

Enclosures



*Lehigh and Northampton Transportation Authority*

1060 Lehigh Street, Allentown, PA 18103

Phone 610-435-4517 • Fax 610-435-6774

www.lantabus.com

November 21, 2011

Mr. [Redacted]  
[Redacted]  
[Redacted]

Dear Mr.

Your application for the LANtaVan Paratransit Service has been received and processed. You have also completed the \_\_\_\_\_ in-person physical and/or  cognitive testing as required. Through this process, it has been determined that, in accordance with the Americans with Disabilities Act, you:

- are not ADA eligible for public transportation services
- are conditionally eligible for public transportation services
- are always eligible for public transportation services

The reasons for the denial are: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

The enclosed ADA eligibility information should help you to understand the eligibility process. If you wish to appeal this decision follow the enclosed appeals process.

Respectfully yours,

Kelly Ann Sokol  
Operations Supervisor

Enclosures





Start Time	Calls In	Calls In Ans	% Calls In Ans	<3 mins.	<5 mins	< 10 mins	>10 mins	% <3 mins.	% <5 mins	% < 10 mins.	% >10 mins.	Avg Ans (In) Time
11/28/2011 11:00:00 AM - 11:30:00 AM	29	29	100.0%	29	29	29	0	100.0%	100.0%	100.0%	0.0%	0:01:26
11/28/2011 11:30:00 AM - 12:00:00 PM	19	18	94.7%	18	18	18	0	100.0%	100.0%	100.0%	0.0%	0:01:33
11/28/2011 12:00:00 PM - 12:30:00 PM	17	17	100.0%	17	17	17	0	100.0%	100.0%	100.0%	0.0%	0:01:11
11/28/2011 12:30:00 PM - 1:00:00 PM	22	21	95.5%	20	21	21	0	95.2%	100.0%	100.0%	0.0%	0:01:36
11/28/2011 1:00:00 PM - 1:30:00 PM	19	19	100.0%	19	19	19	0	100.0%	100.0%	100.0%	0.0%	0:01:27
11/28/2011 1:30:00 PM - 2:00:00 PM	29	28	96.6%	22	27	28	0	78.6%	96.4%	100.0%	0.0%	0:03:00
11/28/2011 2:00:00 PM - 2:30:00 PM	30	29	96.7%	24	28	29	0	82.8%	96.6%	100.0%	0.0%	0:02:10
11/28/2011 2:30:00 PM - 3:00:00 PM	23	23	100.0%	7	10	23	0	30.4%	43.5%	100.0%	0.0%	0:06:17
11/28/2011 3:00:00 PM - 3:30:00 PM	42	40	95.2%	33	39	40	0	82.5%	97.5%	100.0%	0.0%	0:02:36
11/28/2011 3:30:00 PM - 4:00:00 PM	23	23	100.0%	20	22	23	0	87.0%	95.7%	100.0%	0.0%	0:01:56
11/29/2011 8:00:00 AM - 8:30:00 AM	33	31	93.9%	31	31	31	0	100.0%	100.0%	100.0%	0.0%	0:01:04
11/29/2011 8:30:00 AM - 9:00:00 AM	17	15	88.2%	15	15	15	0	100.0%	100.0%	100.0%	0.0%	0:01:26
11/29/2011 9:00:00 AM - 9:30:00 AM	38	36	94.7%	35	36	36	0	97.2%	100.0%	100.0%	0.0%	0:01:49
11/29/2011 9:30:00 AM - 10:00:00 AM	29	28	96.6%	27	27	28	0	96.4%	96.4%	100.0%	0.0%	0:01:49
11/29/2011 10:00:00 AM - 10:30:00 AM	30	29	96.7%	28	29	29	0	96.6%	100.0%	100.0%	0.0%	0:01:38
11/29/2011 10:30:00 AM - 11:00:00 AM	24	23	95.8%	22	22	23	0	95.7%	95.7%	100.0%	0.0%	0:01:34
11/29/2011 11:00:00 AM - 11:30:00 AM	22	22	100.0%	22	22	22	0	100.0%	100.0%	100.0%	0.0%	0:00:57
11/29/2011 11:30:00 AM - 12:00:00 PM	31	31	100.0%	30	31	31	0	96.8%	100.0%	100.0%	0.0%	0:01:45
11/29/2011 12:00:00 PM - 12:30:00 PM	19	18	94.7%	17	18	18	0	94.4%	100.0%	100.0%	0.0%	0:01:39
11/29/2011 12:30:00 PM - 1:00:00 PM	20	17	85.0%	16	16	17	0	94.1%	94.1%	100.0%	0.0%	0:01:44
11/29/2011 1:00:00 PM - 1:30:00 PM	27	27	100.0%	26	27	27	0	96.3%	100.0%	100.0%	0.0%	0:01:20
11/29/2011 1:30:00 PM - 2:00:00 PM	35	35	100.0%	22	30	35	0	62.9%	85.7%	100.0%	0.0%	0:03:09
11/29/2011 2:00:00 PM - 2:30:00 PM	22	21	95.5%	8	18	21	0	38.1%	85.7%	100.0%	0.0%	0:04:26
11/29/2011 2:30:00 PM - 3:00:00 PM	22	22	100.0%	18	21	22	0	81.8%	95.5%	100.0%	0.0%	0:02:25
11/29/2011 3:00:00 PM - 3:30:00 PM	33	32	97.0%	28	30	31	1	87.5%	93.8%	96.9%	3.1%	0:02:28
11/29/2011 3:30:00 PM - 4:00:00 PM	24	22	91.7%	22	22	22	0	100.0%	100.0%	100.0%	0.0%	0:01:30
11/30/2011 8:00:00 AM - 8:30:00 AM	25	23	92.0%	23	23	23	0	100.0%	100.0%	100.0%	0.0%	0:01:09
11/30/2011 8:30:00 AM - 9:00:00 AM	21	20	95.2%	20	20	20	0	100.0%	100.0%	100.0%	0.0%	0:01:17
11/30/2011 9:00:00 AM - 9:30:00 AM	28	28	100.0%	25	28	28	0	89.3%	100.0%	100.0%	0.0%	0:01:48
11/30/2011 9:30:00 AM - 10:00:00 AM	21	21	100.0%	21	21	21	0	100.0%	100.0%	100.0%	0.0%	0:01:10
11/30/2011 10:00:00 AM - 10:30:00 AM	32	31	96.9%	30	31	31	0	96.8%	100.0%	100.0%	0.0%	0:01:22
11/30/2011 10:30:00 AM - 11:00:00 AM	25	24	96.0%	24	24	24	0	100.0%	100.0%	100.0%	0.0%	0:00:55
11/30/2011 11:00:00 AM - 11:30:00 AM	21	21	100.0%	21	21	21	0	100.0%	100.0%	100.0%	0.0%	0:01:21
11/30/2011 11:30:00 AM - 12:00:00 PM	19	19	100.0%	17	19	19	0	89.5%	100.0%	100.0%	0.0%	0:02:15
11/30/2011 12:00:00 PM - 12:30:00 PM	22	21	95.5%	21	21	21	0	100.0%	100.0%	100.0%	0.0%	0:01:18
11/30/2011 12:30:00 PM - 1:00:00 PM	27	26	96.3%	26	26	26	0	100.0%	100.0%	100.0%	0.0%	0:00:59
11/30/2011 1:00:00 PM - 1:30:00 PM	17	17	100.0%	17	17	17	0	100.0%	100.0%	100.0%	0.0%	0:00:49
11/30/2011 1:30:00 PM - 2:00:00 PM	23	23	100.0%	19	21	23	0	82.6%	91.3%	100.0%	0.0%	0:01:53
11/30/2011 2:00:00 PM - 2:30:00 PM	22	21	95.5%	17	21	21	0	81.0%	100.0%	100.0%	0.0%	0:02:29
11/30/2011 2:30:00 PM - 3:00:00 PM	25	24	96.0%	13	22	24	0	54.2%	91.7%	100.0%	0.0%	0:03:36
11/30/2011 3:00:00 PM - 3:30:00 PM	34	32	94.1%	26	32	32	0	81.3%	100.0%	100.0%	0.0%	0:02:36
11/30/2011 3:30:00 PM - 4:00:00 PM	38	34	89.5%	27	33	33	1	79.4%	97.1%	97.1%	2.9%	0:02:50
<b>Totals</b>	<b>3,702</b>	<b>3,583</b>	<b>96.2%</b>	<b>3,131</b>	<b>3,416</b>	<b>3,563</b>	<b>20</b>	<b>87.4%</b>	<b>95.3%</b>	<b>99.4%</b>	<b>0.6%</b>	<b>0:02:03</b>

MDT Problem FALSE  
Modified\_By (Multiple Items)  
Actual / Scheduled (Multiple Items)

Row Labels	Count of Trip_ID		
0-30	15,824	15,824	50.9%
30-60	8,814	24,638	79.2%
60-90	3,992	28,630	92.0%
90-120	1,776	30,406	97.7%
120-150	563	30,969	99.6%
150-180	110	31,079	99.9%
180-210	24	31,103	100.0%
210-240	2	31,105	100.0%
240-270	1	31,106	100.0%
Grand Total	31,106		

September 2011

MDT Problem FALSE  
Modified\_By (Multiple Items)  
Actual / Scheduled (Multiple Items)

Row Labels	Count of Trip_ID		
0-30	15,824	15,824	50.9%
30-60	8,814	24,638	79.2%
60-90	3,992	28,630	92.0%
90-120	1,776	30,406	97.7%
120-150	563	30,969	99.6%
150-180	110	31,079	99.9%
180-210	24	31,103	100.0%
210-240	2	31,105	100.0%
240-270	1	31,106	100.0%
Grand Total	31,106		

October 2011



MDT Problem FALSE  
Modified\_By (Multiple Items)  
Actual / Scheduled (Multiple Items)

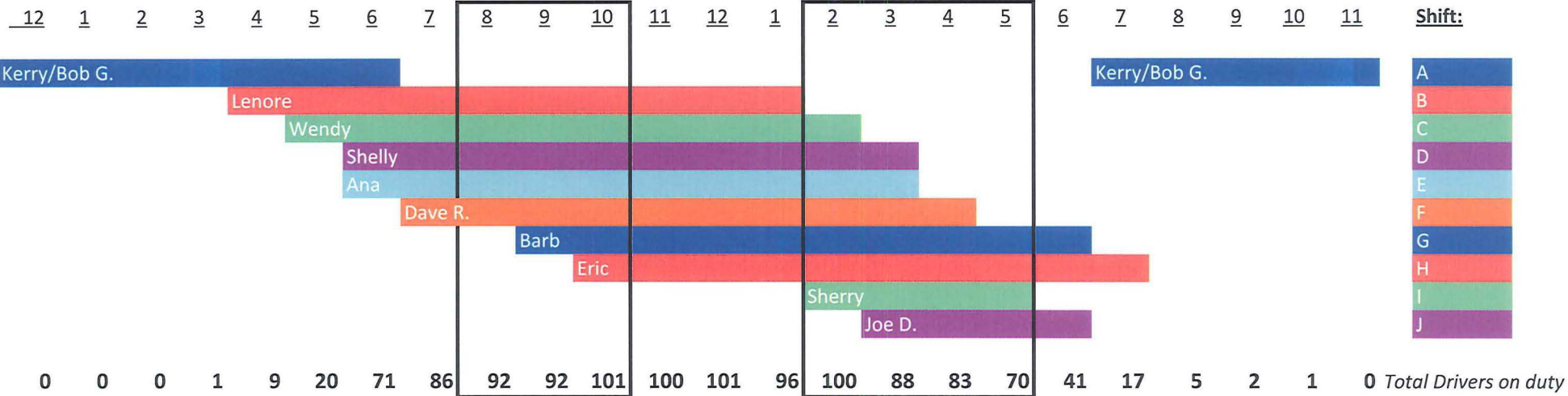
Row Labels	Count of Trip_ID		
0-30	15,517	15,517	51.2%
30-60	8,713	24,230	80.0%
60-90	3,619	27,849	91.9%
90-120	1,710	29,559	97.6%
120-150	563	30,122	99.4%
150-180	144	30,266	99.9%
180-210	24	30,290	100.0%
210-240	3	30,293	100.0%
240-270	4	30,297	100.0%
270-300	1	30,298	100.0%
300-330	1	30,299	100.0%
Grand Total	30,299		

November 2011

ECC Dispatch Schedule

12/5/2011

Monday - Friday



Average Drivers (Runs) per day:

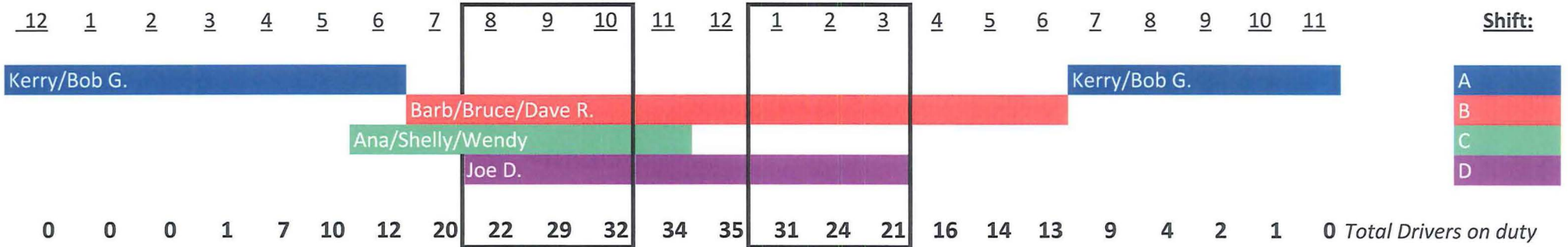
115

Peak times

Average trips per day:

1,804

Weekends



Average Drivers (Runs) per day:

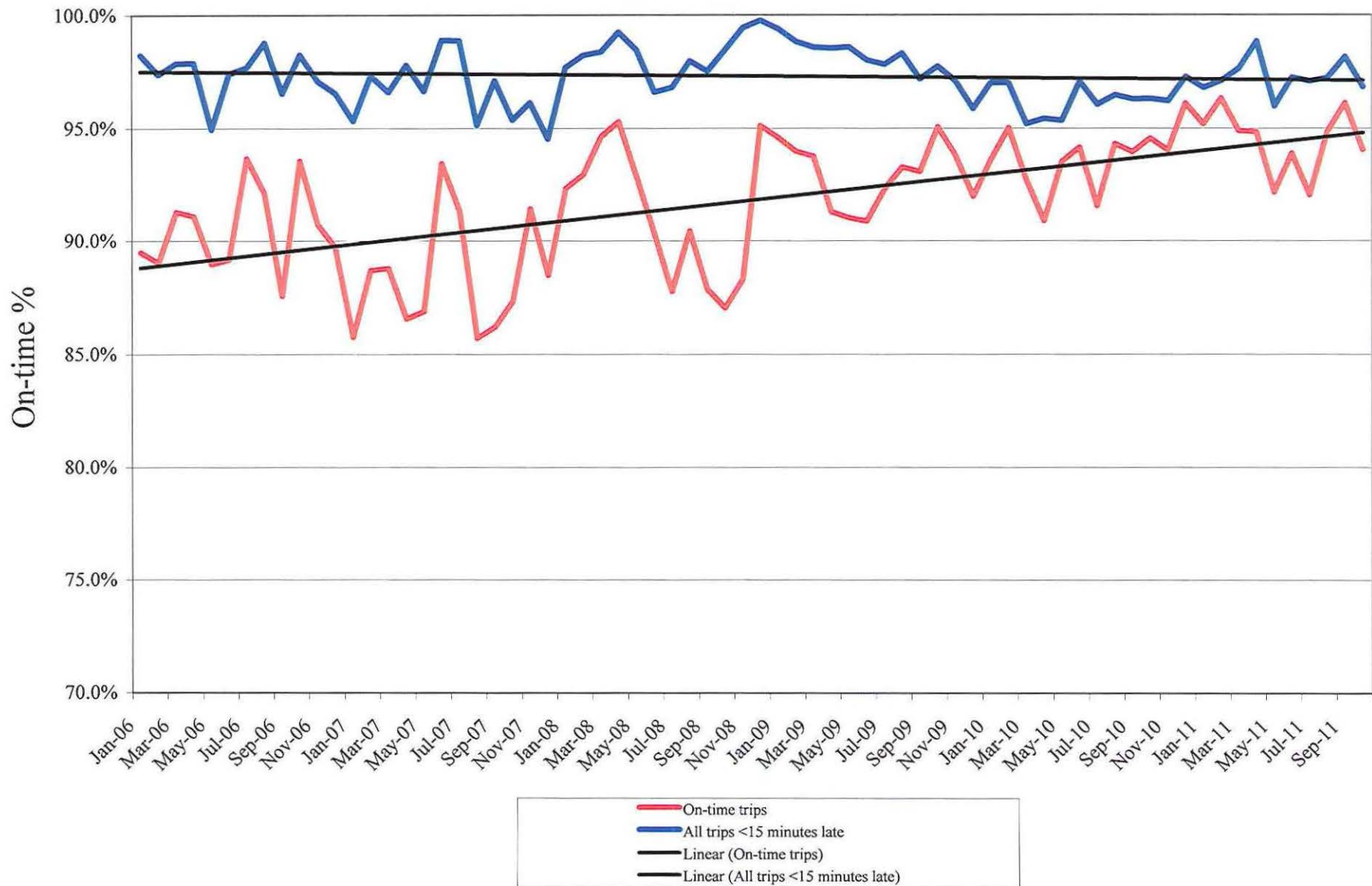
38

Peak Times

Average trips per day:

382

# Metro Plus On-time Stats



LANTA Metro Plus  
On-Time Statistics  
2006 to 2010

		On-time	Early	15-30 late	Subtotal	Reviewed further										Subtotal	# Sample Trips	Total					Percentage					Pct. OT, early & <15 late
						Not Late					N		L	X	Total			On-time & early	Late			All Late						
						1	2	3	4	5	Early	15-30 late	31-60 late	>60 late					15-30	31-60	> 60							
ECC	Jan-09	383	0	0	383	28	26	25	10	1	0	24	3	0	117	500	473	24	3	0	27	94.6%	4.8%	0.6%	0.0%	5.4%	99.4%	
ECC	Feb-09	411	0	0	411	28	18	15	10	3	0	25	6	0	105	516	485	25	6	0	31	94.0%	4.8%	1.2%	0.0%	6.0%	98.8%	
ECC	Mar-09	398	0	0	398	32	18	15	2	2	0	24	6	1	100	498	467	24	6	1	31	93.8%	4.8%	1.2%	0.2%	6.2%	98.6%	
ECC	Apr-09	326	0	0	326	9	14	23	4	2	0	30	6	0	88	414	378	30	6	0	36	91.3%	7.2%	1.4%	0.0%	8.7%	98.6%	
ECC	May-09	389	0	0	389	35	16	14	2	1	0	38	7	0	113	502	457	38	7	0	45	91.0%	7.6%	1.4%	0.0%	9.0%	98.6%	
ECC	Jun-09	279	0	0	279	23	26	28	11	2	0	29	8	0	127	406	369	29	8	0	37	90.9%	7.1%	2.0%	0.0%	9.1%	98.0%	
ECC	Jul-09	317	0	0	317	17	22	12	6	10	0	23	9	0	99	416	384	23	9	0	32	92.3%	5.5%	2.2%	0.0%	7.7%	97.8%	
ECC	Aug-09	366	0	0	366	34	24	12	8	1	0	24	6	2	111	477	445	24	6	2	32	93.3%	5.0%	1.3%	0.4%	6.7%	98.3%	
ECC	Sep-09	345	0	0	345	26	32	22	4	2	0	19	11	2	118	463	431	19	11	2	32	93.1%	4.1%	2.4%	0.4%	6.9%	97.2%	
ECC	Oct-09	311	0	0	311	50	55	30	18	0	0	13	10	1	177	488	464	13	10	1	24	95.1%	2.7%	2.0%	0.2%	4.9%	97.7%	
ECC	Nov-09	359	0	0	359	21	33	25	15	3	0	16	10	4	127	486	456	16	10	4	30	93.8%	3.3%	2.1%	0.8%	6.2%	97.1%	
ECC	Dec-09	333	0	0	333	26	36	23	24	5	0	19	18	2	153	486	447	19	18	2	39	92.0%	3.9%	3.7%	0.4%	8.0%	95.9%	
ECC	Jan-10	338	0	0	338	49	16	22	10	5	0	16	13	1	132	470	440	16	13	1	30	93.6%	3.4%	2.8%	0.2%	6.4%	97.0%	
ECC	Feb-10	379	0	0	379	51	19	21	0	8	0	10	11	4	124	503	478	10	11	4	25	95.0%	2.0%	2.2%	0.8%	5.0%	97.0%	
ECC	Mar-10	390	0	0	390	46	15	14	18	0	0	13	19	6	131	521	483	13	19	6	38	92.7%	2.5%	3.6%	1.2%	7.3%	95.2%	
ECC	Apr-10	382	0	0	382	49	16	17	7	8	0	24	19	5	145	527	479	24	19	5	48	90.9%	4.6%	3.6%	0.9%	9.1%	95.4%	
ECC	May-10	367	0	0	367	41	17	24	14	0	0	9	16	7	128	495	463	9	16	7	32	93.5%	1.8%	3.2%	1.4%	6.5%	95.4%	
ECC	Jun-10	363	0	0	363	31	33	42	15	0	0	15	14	1	151	514	484	15	14	1	30	94.2%	2.9%	2.7%	0.2%	5.8%	97.1%	
ECC	Jul-10	409	0	0	409	34	10	25	10	0	0	24	18	3	124	533	488	24	18	3	45	91.6%	4.5%	3.4%	0.6%	8.4%	96.1%	
ECC	Aug-10	395	0	0	395	27	20	16	14	10	0	11	16	2	116	511	482	11	16	2	29	94.3%	2.2%	3.1%	0.4%	5.7%	96.5%	
ECC	Sep-10	389	0	0	389	50	13	23	7	0	0	12	17	2	124	513	482	12	17	2	31	94.0%	2.3%	3.3%	0.4%	6.0%	96.3%	
ECC	Oct-10	416	0	0	416	22	15	19	11	5	0	9	17	2	100	516	488	9	17	2	28	94.6%	1.7%	3.3%	0.4%	5.4%	96.3%	
ECC	Nov-10	396	0	0	396	26	22	23	0	6	0	11	14	5	107	503	473	11	14	5	30	94.0%	2.2%	2.8%	1.0%	6.0%	96.2%	
ECC	Dec-10	417	0	0	417	19	28	24	0	7	0	6	10	4	98	515	495	6	10	4	20	96.1%	1.2%	1.9%	0.8%	3.9%	97.3%	
ECC	Jan-11	366	0	0	366	35	29	34	1	11	0	8	11	5	134	500	476	8	11	5	24	95.2%	1.6%	2.2%	1.0%	4.8%	96.8%	
ECC	Feb-11	399	0	0	399	27	32	30	1	11	0	4	12	3	120	519	500	4	12	3	19	96.3%	0.8%	2.3%	0.6%	3.7%	97.1%	
ECC	Mar-11	376	0	0	376	40	33	30	2	3	0	14	11	1	134	510	484	14	11	1	26	94.9%	2.7%	2.2%	0.2%	5.1%	97.6%	
ECC	Apr-11	397	0	0	397	29	35	29	7	0	0	21	4	2	127	524	497	21	4	2	27	94.8%	4.0%	0.8%	0.4%	5.2%	98.9%	
ECC	May-11	336	0	0	336	64	40	15	0	4	0	19	14	6	162	498	459	19	14	6	39	92.2%	3.8%	2.8%	1.2%	7.8%	96.0%	
ECC	Jun-11	338	0	0	338	38	60	36	0	6	0	17	9	5	171	509	478	17	9	5	31	93.9%	3.3%	1.8%	1.0%	6.1%	97.2%	
ECC	Jul-11	354	0	0	354	43	45	26	7	0	0	26	12	3	162	516	475	26	12	3	41	92.1%	5.0%	2.3%	0.6%	7.9%	97.1%	
ECC	Aug-11	311	0	0	311	36	59	67	7	0	0	12	12	2	195	506	480	12	12	2	26	94.9%	2.4%	2.4%	0.4%	5.1%	97.2%	
ECC	Sep-11	298	0	0	298	52	56	61	6	0	0	10	6	3	194	492	473	10	6	3	19	96.1%	2.0%	1.2%	0.6%	3.9%	98.2%	
ECC	Oct-11	309	0	0	309	21	84	48	13	0	0	14	12	4	196	505	475	14	12	4	30	94.1%	2.8%	2.4%	0.8%	5.9%	96.8%	

Note: June 2007 includes 165 trips with poor time data because MDT's were down much of the month.

## **LANtaVan Service Incident Report Procedure**

If you have a complaint or a compliment or a suggestion, please call 610-432-3200 (toll free (800) 932-8748) Monday through Friday, 8 a.m. to 4 p.m. Consumer complaint/compliment/suggestion forms are also available on board vehicles or from Metro Plus drivers.

Complaints received at the LANtaVan office will be documented in written up in triplicate form.

Distribution of the copies is as follows:

- 1 copy to the LANTA Executive Director
- 1 copy to the LANTA Assistant Executive Director
- 1 copy to be kept on file in the Metro Plus office

A copy of the complaint is sent to Easton Coach Co. (ECC) for investigation. ECC is to investigate the issue and respond to the customer and record the outcome of the investigation within 5 (five) business days

Once the carrier informs LANtaVan of their findings, LANtaVan will, within 5 working days, inform the passenger of the findings and any action taken.

The LANtaVan Manager will review the nature and type of complaints on a monthly basis. Based on this review necessary corrective action may be taken.

Attached is the formal LANTA complaint form and the consumer complaint form.

Check one:  
Metro   
Metro Plus

Date Received: \_\_\_\_\_  
Received By: \_\_\_\_\_

**CUSTOMER SERVICE FORM**

Complaint \_\_\_\_\_  
Commendation \_\_\_\_\_  
Suggestion \_\_\_\_\_

Customer's Name \_\_\_\_\_  
Address \_\_\_\_\_ Phone \_\_\_\_\_  
\_\_\_\_\_ Zip \_\_\_\_\_

DATE OF INCIDENT: \_\_\_\_\_ TIME: \_\_\_\_\_ A.M. \_\_\_\_\_ INBOUND \_\_\_\_\_  
P.M. \_\_\_\_\_ OUTBOUND \_\_\_\_\_ BUS # \_\_\_\_\_

ROUTE #: \_\_\_\_\_ Employee's Name  
(if known) \_\_\_\_\_

LOCATION: \_\_\_\_\_

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Driver attitude/conduct  | <input type="checkbox"/> Bus did not show                | <input type="checkbox"/> INFORMATION SERVICES |
| <input type="checkbox"/> Careless driving/comfort | <input type="checkbox"/> Off Route                       | <input type="checkbox"/> MARKETING            |
| <input type="checkbox"/> Early                    | <input type="checkbox"/> Fare/Trans. Dispute             | <input type="checkbox"/> ADMINISTRATION       |
| <input type="checkbox"/> Late                     | <input type="checkbox"/> Wrong Signage                   | <input type="checkbox"/> PLANNING             |
| <input type="checkbox"/> Passed By                | <input type="checkbox"/> Motor run/lights on at terminal | <input type="checkbox"/> Route Protest        |
| <input type="checkbox"/> Missed Transfer          | <input type="checkbox"/> Disturbance                     | <input type="checkbox"/> Stop signs/Shelters  |
| <input type="checkbox"/> Overload                 | <input type="checkbox"/> Accident                        | <input type="checkbox"/> Service Request      |
|   | <input type="checkbox"/> Other                           | <input type="checkbox"/> MAINTENANCE          |

CUSTOMER'S REMARKS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**1. FORWARD TO ADMINISTRATION**

2. Route to: OPS \_\_\_\_\_ Information Services \_\_\_\_\_ Marketing \_\_\_\_\_ Planning \_\_\_\_\_ Maintenance \_\_\_\_\_

(SUPERVISOR USE ONLY) Action Taken and Comments. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

3. ADMINISTRATION Action Taken: Date \_\_\_\_\_ Correspondence \_\_\_\_\_ Other \_\_\_\_\_

4. SUGGESTION FILE Route # \_\_\_\_\_ Computer Entry \_\_\_\_\_

Distribution: White copy—Executive Director; Yellow copy—Development Dept.; Pink copy—Dept. of Referral



## **LANtaVAN: Customer Ride Guide**

### **Introduction**

The Lehigh Valley's paratransit service is called LANtaVan (formerly Metro Plus). The service is provided under contract with a private company, Easton Coach Company of Easton, PA. A fleet of 120 vehicles is dedicated to this service and more than 2,000 trips are scheduled on the system daily.

This handbook includes policies and procedures, rules and regulations, and guidelines for use of the paratransit system. The handbook will answer most questions about LANtaVan operations. All paratransit customers should review this handbook carefully and refer to it whenever questions arise.

LANtaVan is a coordinated, shared-ride transportation service. A number of programs and agencies sponsor passengers who all ride on the same vehicles.

LANtaVan is a paratransit van service that is specially equipped with wheelchair lifts and other accessibility features that allow for maximum mobility for customers with disabilities.

LANtaVan operates on a demand-response basis at a reduced fare for residents and visitors within Lehigh and Northampton Counties limits who are registered and certified as eligible for sponsorship through available programs.

LANtaVan is also a public transportation service open to the general public for full fare.

LANtaVan service is available during the same hours that LANtaBus city transit services are available: 5:30 am - 7:00 pm on weekdays and Saturdays, and 7:00 am – 7:00 pm on Sundays. On weekdays and Saturdays, there is also evening service available on a number of bus routes from 7:30 to midnight.

### **LANtaVan Paratransit Service**

LANtaVan service is designed to meet the transportation needs for people sponsored by a variety of programs. Some of these programs are listed below. At least one of the sponsoring programs, the Department of Welfare's Medical



Assistance Transportation Program, has its own set of 'rules and regulations' so please refer to brochures that describe that program for more detailed information.

The Pennsylvania State Lottery Shared Ride Program:  
Medical Assistance Transportation Program, PA Department of Welfare;  
The Americans with Disabilities Act program  
The Persons with Disabilities fare discount program;  
Various other social and governmental fare subsidy programs.

These programs and their eligibility requirements are described below in general terms. Specific brochures providing greater detail are available and are sent to all customers granted eligibility within each program.

**Eligibility:**

- 1) The Pennsylvania State Lottery Shared Ride Program is a program only for people 65 and older who cannot ride or do not have access to the regular Metro, city transit bus services. An application and proof-of-age is required for eligibility. Customers pay 15% of the total trip cost; the balance is paid through State Lottery proceeds.
- 2) The Medical Assistance Transportation Program through the Pennsylvania Department of Public Welfare must meet the income categories that DPW maintains. The purpose of this program is to provide people who are financially disadvantaged with access to transportation to access necessary medical treatment. The DPW pays the full fare for people who are eligible for this program. An eligibility application is required as well as a check on eligibility within the State DPW database for both the person and the services accessed. The lowest cost, most effective transportation mode is selected for each customer and these range from reimbursement for auto mileage expense, to reimbursement of regular Metro city transit fares, to free access to LANtaVan paratransit service.
- 3) The Americans with Disabilities Act of 1990 made it a civil protection under the law for people with disabilities to have access to federally-sponsored public transit services. Persons with disabilities in the community who, because of their disability are prevented from boarding a LANTA Metro city transit bus may ride LANtaVan. An in-person interview and evaluation are required to determine a persons' ADA paratransit eligibility. Complementary paratransit service is available within ¾ mile of a LANtaBus route to ADA eligible passengers.
- 4) The Persons with Disabilities (PwD) reduced fare program is available to people who have a disability and who are not sponsored by any other program. Eligibility is determined through a submission of a written

application with a medical professional's verification. LANtaVan staff will assess whether or not there are other programs in the community that could underwrite the fare or discount the fare to the passenger applying. PWD fares are the same as Shared Ride fares (15% of the total trip cost).

For additional information about your specific transportation needs, please contact: 610-432-3200 or email [customerservice@lantabus.com](mailto:customerservice@lantabus.com)

## **ADA**

There is confusion about the Americans with Disabilities Act of 1992 - ADA. It is a civil rights law that extended the right to use existing public transit services funded by federal dollars. It was not an expansion of public transit services. It allows people with disabilities to access the same transit services that the general community has access to. It also provides that transit agencies are to provide 'complementary paratransit' services to those who, due to a physical or mental disability, are "prevented" from using the regular transit services.

The ADA is a civil rights law, not a transportation law, or a social program. The ADA requires non-discriminatory access to fixed-route service, with complementary paratransit service acting as a "safety net" for people who cannot use the regular bus system.

As of July 2006, all LANta city buses are equipped with wheelchair ramps, "kneeling" mechanisms, and other features making the transit system fully accessible to people with disabilities.

In April, 2007, LANTA introduced a special \$1.00 all day pass for people with disabilities to encourage the use of the regular public transit system instead of the LANtaVan door-to-door services.

For eligibility requirements for this dollar day pass please call 610-432-3200.

### **Eligibility Standards for ADA paratransit:**

Eligibility is determined through an application process along with an in-person interview and evaluation by a physical therapist.

### **Permanent Disabilities**

#### CATEGORY 1

Category 1 consists of persons who are unable to board, ride, or disembark from the bus even if they are able to get to the stop and the bus is accessible. Persons in this category include individuals with mental or visual impairments who cannot navigate the bus system. Examples of navigating the system include recognizing destinations and understanding the transfer process.

## CATEGORY 2

Category 2 consists of persons who cannot use buses without wheelchair lifts or other accommodations. These persons are eligible for paratransit service if accessible buses are not available on the fixed-route on which they want to travel.

## CATEGORY 3

Category 3 consists of persons with specific impairment-related conditions who cannot travel to a bus stop or from a bus stop to their final destination. The specific impairment-related condition must prevent the person from using regular, fixed-route transit. A person is eligible if traveling to and from a bus stop is impossible when architectural and/or environmental barriers are combined with the specific impairment-related condition.

## Temporary Disabilities

The standards for eligibility are the same as those for permanent disabilities. Persons with temporary disabilities who are eligible for service will be provided service only for the duration of their disability.

## **Conditional/Unconditional Eligibility**

Eligibility will be determined either “conditional” or “unconditional.” An individual with “conditional eligibility” is one who is approved for some trips or under certain conditions. An individual with “unconditional eligibility” is one who is approved for all trips.

## **Application and Certification Process**

To apply for LANtaVan service, the prospective user must complete an application packet. Application packets may be obtained through the Customer Service Department at 610-432-3200. Only original applications will be accepted, no duplicated or photocopied applications. Prospective customers must contact LANtaVan for an original application. Applications must be returned via mail or in person; no applications will be accepted via electronic means such as fax machines or email.

Applications are available at LANTA’s website: [www.lantabus-pa.gov](http://www.lantabus-pa.gov). The application cannot be completed online - it should be printed out, completed, signed and mailed to LANTA, 1060 Lehigh St, Allentown, PA 18103.

## **The Paratransit Eligibility application is divided into three (3) sections:**

- Section 1 – General - This section must be completed by the applicant or their representative. The applicant MUST ANSWER ALL QUESTIONS in

this part and the applicant's signature is required. Applicants who complete this section and do not continue are applying for the **Pennsylvania Lottery funded Shared Ride Program** for people 65 and older which is granted on the basis of age (65+).

- Section 2 – this section asks questions about the individual's eligibility for the **Pennsylvania Department of Public Welfare's Medical Assistance Transportation Program (MATP)**. This program requires a DPW issued ACCESS card.
- Section 3 – is the application section pertaining to the **Americans with Disabilities Act (ADA)** Program and is for ADA eligibility. In addition to the written application, an in-person interview and evaluation is required.

**People with Disabilities Program:** If you have a disability and do not meet eligibility requirements of the above programs, you may fill out this application which is available upon request.

### **Application Policies and Procedures**

Within twenty-one (21) days of receiving a completed application, the application will be processed and LANtaVan will inform the applicant of their eligibility determination. Please note that an application is only considered complete when all information is provided, any omission renders an application incomplete. Incomplete applications will be returned to the applicant, and the 21 days will not start until the completed application is returned to LANtaVan.

If an application is approved, the applicant will receive a LANtaVan ID Card. This card allows an applicant to schedule rides with LANtaVan. Each rider is given an identification number that appears on the ID Card. The card can be used as identification for paratransit service on other transit systems if you are traveling out of town.

The ID Card will be wallet-sized, and will contain the following information:

1. Name of the eligible individual and the unique ID number
2. Name of the transit provider (LANtaVan)
3. LANtaVan telephone number
4. Expiration date if any
5. Conditions - including the use of a Personal Care Attendant (PCA)
6. The eligible individual must sign the ID card in the space provided.

If the application is denied, the applicant will receive a letter explaining the reason or reasons for the denial. Also included will be instructions on filing an appeal.

If LANtaVan has not made a determination of eligibility within 21 days following the receipt of a completed application, the applicant will be treated as eligible and provided service until and unless the individual is determined to be ineligible for paratransit service.

### **Recertification**

All LANtaVan paratransit customers are required to recertify at reasonable intervals. A recertification packet will be mailed to you well in advance in order to allow maximum time for the process. In some cases, you may be asked to fill out and submit a new application.

### **Important Points to Remember**

**LANtaVan is a limited, special transportation service.**

- 1) LANtaVan eligibility does not include persons who find it uncomfortable or difficult to get to and from bus stops.
- 2) The physician who verifies the applicant's disability should consider only the presence of a disabling condition and how that condition affects the person's mobility with regard to riding a bus, not the applicant's age or economic status or diagnosis.
- 3) Paratransit eligibility is a transportation decision, not a medical one. A doctor's letter certifying disability will no longer be the sole criteria for riding LANtaVan. LANtaVan alone will determine paratransit eligibility.

### **Fares and tickets**

LANtaVan is not a free service. A LANtaVan customer either pays a fare or has a sponsor who pays for fares. Tickets must be purchased in advance.

If a customer is self-pay, tickets are required to ride LANtaVan. These are available through LANTA's Customer Service Department, at various locations throughout the Counties, or may be purchased by mail.

If a customer has a full-fare sponsor, the sponsor informs LANtaVan in writing that they are going to pay for the customer's trip costs. These customers do not need tickets.

Please contact LANtaVan or refer to a current brochure for fare and ticket prices.

### **Visitor Policy**

LANtaVan will honor paratransit certifications from other transit systems. An individual from out of town requesting service must present proof of their

certification. A letter stating paratransit eligibility is acceptable. Documentation must include the name of the eligible individual, the name of the certifying paratransit provider, the telephone number of the provider's paratransit coordinator, an expiration date (if any), and any conditions or limitations on eligibility. If the individual has indicated the need for a Personal Care Attendant (PCA), this must be noted in the documentation.

If the person does not have an identification card or other documentation from their local area, LANtaVan will require the person to provide the scheduler with documentation of their place of residence, and their disability if the disability is not apparent. LANtaVan will not provide service to a visitor for more than twenty-one (21) days from the date of the visitor's first paratransit trip; visitors will be required to apply for LANtaVan in order to receive transportation beyond this twenty-one (21) day period. However, the twenty-one (21) days can be consecutive or divided over several shorter visits. A visitor who expects to be in the Lehigh Valley area for more than twenty-one (21) days should apply for a LANtaVan card as soon as possible after arriving in the area.

### **Description of LANtaVan Paratransit Service**

LANtaVan is a 'door-to-door' service which means drivers will accompany passengers to and from the front doors of the origins and destinations if necessary. Under no circumstances is a driver required to go 'through the door' on either a pick-up or a drop-off.

The driver may arrive up to 15 minutes before or 15 minutes after a scheduled pick up time. Passengers should be ready 15 minutes before the scheduled pick up time, and watch for the driver to arrive. Passengers should have tickets at the ready also.

The driver will wait for 5 minutes at a pickup location.

Drivers, upon arriving, will knock or ring the doorbell. If assistance is needed the driver will assist the passenger from the door of the residence into the vehicle. The driver may request family assistance when moving a passenger from or to a residence.

When transporting passengers in wheelchairs, drivers are only permitted to negotiate one step at the entrance of the residence and the destination.

Oxygen tanks for personal use are permitted on board vehicles but must be 'secured.' Under no circumstances will 'large' oxygen tanks be transported on vans.

### **Scheduling Trips**

When scheduling a paratransit trip, the following information is required: name, ID number; trip date and appointment time; pick-up address; destination address; number of guests (companions), if any; accompanying Personal Care Attendant (PCA), if applicable; and, if a return trip is desired, the return time.

LANtaVan provides “next-day service.” This means that requests for trips for a particular day may be made any time during the preceding day (up until 4 p.m. the day before the service including weekends and holidays).

Customers may make ride reservations up to fourteen (14) days in advance.

A trip is defined as beginning with the pick-up location and ending at the destination location. An individual may book several trips during the same telephone call for reservations. The customer may also set up a ‘standing order’ reservation to eliminate the need to call for a routine trip.

A standing order is a trip or series of trips that are booked to continue on a repetitive basis without the customer having to call frequently to arrange service. For example, a customer may travel three times a week for medical treatment so he/she ‘books’ that trip in advance and it repeats until the customer calls to cancel it. Similarly, a work commute schedule would include daily service.

Customers should be ready to go fifteen (15) minutes prior to their scheduled pick-up time. A pick-up is considered “on-time” if it occurs within fifteen (15) minutes before or fifteen (15) minutes after the scheduled time. The driver will notify the dispatcher if the van will be more than fifteen (15) minutes late, so that the dispatcher can attempt to contact the rider and inform them of the new estimated pick-up time.

Drivers will wait 5 minutes for a passenger when the van arrives within the on-time window. An attempt will be made to alert the passenger that the van has arrived.

Passengers with trips other than standing order trips, will receive a call the day before, reminding them of the trip scheduled. If the time provided in this reminder call does not match the time originally provided, the customer may ask for the original time and is not required to accept the adjusted time.

If a passenger is going to be late or decides at the last minute that they do not wish to travel that day, we would appreciate it if we are informed. Please call the LANtaVan reservation telephone number to report change.

### **Trip Purpose**

There are no restrictions on trip purpose. All requests for trips are accepted on a first-come, first-served basis. There are no 'wait-lists' – any trips that are booked are provided.

### **Trip length**

The area served by LANtaVan is large: more than 1,600 square miles! Many trips across the Valley are very long even when taken by car or bus. We try to make the customer's trip as efficient as possible so that no one is on board the vehicle for an unreasonable period of time. As a measure of service quality, LANtaVan trip length standard is generally what it would take to get from an origin to a destination by regular bus - including transfers between buses - and the length of time to cover the distance from home to bus stop and from bus stop to the destination. Generally, LANtaVan are within these criteria however, due to passenger loads and long distances between origins and destinations, riders may be on board vans for a good length of time.

If you feel your trip is unreasonably long or not logically scheduled, call 610-253-4055 and ask to speak with a supervisor to review the situation.

### **Rules and limitations**

What Operator Assistance is Provided? The driver:

WILL assist a customer to and from the van.

WILL pull into apartment complex areas, parking lots, or behind commercial buildings if the van can be safely parked and the lift deployed.

WILL for the sake of time, assist a customer with articles, i.e. shopping bags, grocery bags, etc. For practicality, no more than three shopping bags will be permitted. The driver is not permitted to take articles into a customer's residence.

WILL NOT wait longer than five (5) minutes for a customer to appear for their scheduled pick-up as long as the driver is within the 15 minute pick up window.

WILL NOT leave if the customer is within sight of the van and is attempting to make their way to the van.

WILL NOT leave the van unattended, out of sight, with the engine operating.

WILL NOT assist any customer into or out of their house or any other facility.

WILL NOT transport any customer who is too ill to sit up and be secured in their seat, nauseous, vomiting, or bleeding. In such instances, the driver will first



notify dispatch of the customer's condition and then, if necessary, advise medical authorities of either the customer's need for medical attention or that they must remain at the medical unit until they are well enough to travel on the van.

### **Guests (companions)**

Customers who are ADA paratransit eligible will be allowed to travel with at least one guest (companion), such as a friend or relative. The fare for the companion will be the same as the fare for the ADA paratransit eligible customer.

Additional guests accompanying the customer will be allowed on a space available basis only and will be charged the discounted co-pay fare.

Please note that LANtaVan requires that the customer reserve a space for the companion when the customer reserves their own ride. The companion must have the same trip origin and destination as the customer.

### **Personal Care Attendant (PCA) - Escort**

A Personal Care Attendant (PCA) is someone designated or employed specifically to assist the paratransit eligible individual in meeting their needs. LANtaVan recognizes a PCA as a mobility aid to the eligible customer. The PCA must have the same trip origin and destination as the customer. In addition, LANtaVan requires that space for the PCA must be reserved at the same time that the customer reserves their trip. No fare is charged for a PCA.

The customer may take along a companion in addition to the PCA. It should be remembered that a family member or friend is regarded as a companion accompanying the customer, and not as a PCA, unless the eligible customer regularly makes use of a PCA and the family member or friend is acting in that capacity.

Through the eligibility process, it will be determined whether or not a person can travel independently without a PCA.

### **Securement / tie downs / seat belt use**

For passenger safety during travel, LANtaVan customers are required to use seat belts or securement devices at all times. Refusal to use seat belts or the appropriate securement system will result in the suspension of service. However, if a particular mobility device cannot be secured by the existing securement system, services will not be suspended and we will do "the best we can."

All common wheelchairs and their users can be transported by LANtaVan. A common wheelchair is a wheelchair that does not exceed thirty (30) inches in

width, forty-eight (48) inches in length, and does not weigh more than six hundred (600) pounds when occupied.

All wheelchair users must ride in designated securement areas only. Persons who are not wheelchair users, but use other mobility aids are allowed to use the lift mechanism provided that the mobility aid can be physically accommodated by the vehicle and its equipment.

Collapsible (folding) wheelchairs may be carried on all vans.

Ambulatory customers who require the lift to board may use these wheelchairs to facilitate entry into the van.

### **Children**

On **LANtaVan**, if you will be traveling with a child age 8 or under, who weighs less than 80 pounds, you must provide the a child safety seat and you must properly secure the child in it. The driver will provide assistance if necessary. **Children, up to 8 years of age, will NOT be transported without child safety or booster seat as required by Pennsylvania state law.**

Children 12 and under must be accompanied by an adult while riding.

Children ages 13 -17 may travel without an accompanying adult only if it can be demonstrated that they would be able to use public transit independently.

Children who are registered riders must pay full or sponsored fares, and all rules applying to adult riders also apply to children. Children traveling as companions must also pay full or sponsored fares.

### **Other mobility aids/equipment:**

Customers are welcome to travel with service animals trained to assist them. Service animals include guide dogs used by customers with vision or hearing impairments, as well as dogs or other animals that provide aid to customers with mobility impairments. The customer should inform the scheduler that they are traveling with a service animal when they make their trip reservation.

Customers may also travel with *portable* oxygen or other equipment, provided that the equipment does not violate rules concerning transportation of hazardous materials.

All oxygen tanks must be secure while in transit.

Customers must provide their own oxygen supply sufficient for the duration of the trip. Please note: occasionally there are delays in service due to a variety of

reasons. Customers would be prudent if they brought along a spare portable oxygen tank.

## **No-shows / Late Cancellations**

### **Purpose for Establishing a No Show Policy**

Sporadic passenger no shows, cancels late, and cancels at door are an expected cost of doing business for a paratransit system. However, the cost of providing ADA Complementary Paratransit Service is growing and all eligible demand for paratransit trips must be met; excessive no shows, late cancels and cancels at the door adversely affect the efficiency of service and significantly add to the cost of operating the system.

### **Definitions**

**Early Cancellation** - LANTA defines an early cancellation as occurring when the customer (or the customer's advocate) calls and cancels a specific scheduled trip at least 24 hours prior to the service schedule time.

**Late Cancellation** - LANTA defines a late cancellation when the customer (or the customer's advocate) does not call and cancel a specific scheduled trip at least 24 hours prior to the scheduled time (other than early morning trips as identified above).

**Cancel at Door** - LANTA defines a cancel at door as occurring when the vehicle arrives at the location designated for a specific scheduled trip within 30 minutes of the scheduled time and the customer (or the customer's advocate) notifies the operator at that time that they no longer need the scheduled trip.

- The operator will verify the need for any other trips scheduled for that day and advise Dispatch accordingly when calling in the cancel at door.

**No Show** - LANTA defines a No Show when all of the following criteria have occurred:

- There has been no call by the customer (or the customer's advocate) to cancel the scheduled trip 90 minutes or more before the Be Ready Time. **AND**
- The vehicle arrives at the scheduled location with 30 minutes after the Be Ready Time. **AND**
- The operator notifies or attempts to notify the customer that they have arrived. **AND**
- The operator cannot reasonably see the customer approaching the vehicle after waiting five minutes. **AND**

- The Dispatch office is notified. At this time, Dispatch will verify that the operator is at the correct location.

**No Shows are EXCUSED when the trip is missed for the reasons beyond the customer's control (illness, personal emergencies, van is excessively late and alternative transport was arranged).** LANTA accepts these reasons and will work with customers experiencing such issues.

Although no shows will not be issued for reasons beyond the customer's control, the customer (or the customer's advocate) should ALWAYS make every effort to cancel scheduled trips in a timely manner. It is the customer's (or the customer's advocate) responsibility to provide the reasoning for not canceling a trip. Contact should be made with LANTA as soon as possible. Lack of any contact will result in a No Show being recorded.

Any patterns or practices of excessive volume of excused No Shows will be reviewed for appropriate action.

Below is a table indicating the volume of No Shows that may be accumulated per month before action will be taken:

Trips Booked per Month and not cancelled in advance	Maximum Number of No Shows per Month
1 - 14	2
15 - 39	4
40 – 59	6
60 - 79	8
80 - 99	10
100 or more	12

*Please do not consider this guideline as a justification for not calling when a trip is not needed.*

Consequences for an Established Pattern/Practice of No Shows as defined in the table above:

1st Violation	Letter of warning and/or phone contact
2nd Violation	2 Day Suspension
3rd Violation	5 Day Suspension
4th Violation	10 Day Suspension
5th Violation	30 Day Suspension

Violation history covers a 6 month floating period.

**Example:** In January you book between 15-39 trips and you receive 4 or more No Shows - you would receive a letter of warning and/or a phone call as a 1st violation. In February, you book the same volume of trips and continue to No Show and receive 4 or more No Shows, you would face suspension for 2 days. Your history would continue for a six month period from your 1st violation. On the first of July, your January history of no shows and violation would go away.

## **Appeals Process**

A customer (or a customer's advocate) may file a written appeal for an individual no show issued by contacting the LANTA Manager. See the **LANtaVan Paratransit Appeals Process below for details.**

## **Customer Behavior**

Neither profanity nor abusive language/conduct is acceptable on LANtaVan vans, or when communicating with LANtaVan or Easton Coach dispatch or scheduling staff.

Weapons of any type will not be allowed on LANtaVan vans.

Radio/tape/CD players must be equipped with headphones to be used on LANtaVan vans.

Eating or drinking is not allowed on LANtaVan vans. Medical exceptions may be made to the no eating or drinking rule, with appropriate documentation from a physician.

Smoking is not permitted on LANtaVan vans.

Depending on available space, three (3) bags of groceries or other articles may be carried by a LANtaVan rider. The driver will assist with taking bags to the passenger's door; however, the vehicle operator will not go into a customer's home. The driver is also not permitted to go into a store to assist a customer with bags or groceries. The customer is responsible for transporting bags or other items through the door.

## **Illegal or disruptive conduct**

Service will be suspended or refused to customers who engage in violent, seriously disruptive or illegal conduct that affects the safety of the individual, the

driver or fellow passengers. The severity of the incident will determine whether an individual is suspended temporarily or permanently. For example, a person whose behavior threatens or has threatened the safety of paratransit personnel or other customers may be refused service (permanent revocation of eligibility). An individual who contests a refusal of paratransit service may appeal the decision through the administrative appeal process described below.

## **LANtaVan Paratransit Appeals Process**

### **Right to appeal**

The ADA requires that transportation providers establish a process for persons to appeal decisions if they are denied access to Paratransit service.

LANta has established an appeals procedure for persons whose applications for Paratransit eligibility are denied or for persons who have received suspension notices for other reasons.

An individual may file an appeal when LANta denies Paratransit service for any of the following reasons:

- Denial of Eligibility
- Suspension resulting from excessive No-Shows or Cancellations
- Suspension for Disruptive Behavior

### **The appeals process**

LANta will inform an applicant or current customer of a decision to deny eligibility status or to suspend service by letter.

Requests to appeal a denial of eligibility must be received within 60 (sixty) days of the date on the eligibility denial letter. Requests to appeal a suspension must be received within 10 (ten) calendar days of the date of the notice of suspension letter.

Requests for an appeal must be sent in writing to the ADA Administrative Appeals Committee at the following address:

Manager, ADA Programs  
Attn: ADA Appeal Request  
LANTA  
1060 Lehigh Street  
Allentown, PA 18103

Once the request for an appeal is received, it will be reviewed by an Appeals Committee.

The Appeals Committee consists of two LANTA staff members who were not involved in the original decision, and a volunteer from the Lehigh Valley Center for Independent Living (LVCIL).

The Appeals Committee will issue a written decision within 30 (thirty) days of the appeal hearing. The decisions of the Appeals Committee shall be final.

LANTA is not required to provide service to individuals who are pursuing an eligibility appeal. However, if the Appeals Committee has not made a decision within 30 days after the hearing, temporary service will be provided. This temporary service will continue until a decision on the appeal is reached.

Persons requesting an appeal will be notified in writing of the time, date and location of the appeal hearing. Individuals are encouraged to attend the appeal hearing although attendance is not required. If Individuals requesting appeals cannot attend, they may request a telephone interview or have another person(s) represent them at the hearing. If the individual or a designated representative is not present at the appeal hearing, the Appeals Committee decision will be based on the documentation submitted. All copies of the appellants' application and all supporting materials used in the appeals process will remain confidential.

Upon appeal for a No-Show or Cancellation suspension, Paratransit service will be provided pending the appeal; suspension of service will not begin until the appeals process is complete. If a decision is not made within 30 (thirty) days of the completion of the appeal hearing, the individual appealing the suspension shall be granted service until a final decision has been reached.

### **Emergency or unusual situations**

#### **Accidents:**

Fortunately, LANtaVans' safety record is excellent so you should feel very safe while riding. However, in the unlikely event that you are a customer on board a van that is involved in an accident, please remain calm and follow the van driver's instructions. Evacuate the van quickly when asked to do so. You might also be asked to provide information as a 'witness' and we do ask for your cooperation.

If you are injured, medical attention will be provided as soon as emergency medical services can be arranged for. If there are serious injuries, parties will be taken to the hospital by ambulance.

#### **Inclement Weather**

LANTA notifies LANtaVan passengers about Snow Emergency Detours through the following media: WAEB AM 790, WAEB FM B104, WFMZ TV. Passengers may or check LANTA's website at [www.lantabus.com](http://www.lantabus.com) for current status.

### **Late service or 'no show' service**

Traffic congestion, accidents, illness on board and other unexpected events can result in a van being late for a pick-up. If you have a question about your trip on the day of the trip or while you are 'in transit,' please call 610-253-8333 Ext. 1027. This is the Easton Coach Dispatcher's office and they will assist you.

LANtaBus services may be operating at some level, but LANtaVan door-to-door services are generally severely curtailed during major snow storms because of sidewalks that are not cleared or the inability to deploy wheelchair lifts at curbside. Call your carrier directly for specific information about your trip.

When there is ice and snow, we ask customers to clear a path from their door to the van. It is important that this path be free of ice and snow accumulation and wide enough of an area to permit the deployment of a wheelchair lift if necessary.

### **How can I make suggestions, comments or Inquire about LANtaVan?**

If you have a suggestion or a comment about our services, please call LANtaVan's Customer Service Center at (610) 432-3200.

You may also e-mail [customerservice@lantabus.com](mailto:customerservice@lantabus.com) or write to: LANtaVan Manager, 1060 Lehigh St, Allentown, PA 18103. Or submit a compliant via the website: [www.lantabus.com](http://www.lantabus.com)

Specific details help LANtaVan address your suggestions and comments. Please include the following information when calling or writing:

- Name, address and telephone number
- Day and time of experience
- Vehicle number and/or driver's name, if applicable
- Reservation or Paratransit Services Agent's name, if concerning a telephone conversation
- Explanation of incident, suggestion or comment



This application is for LANtaVan special transportation programs:

- **The Pennsylvania Lottery funded Shared Ride Program** for people 65 and older
- **The Pennsylvania Department of Public Welfare's Medical Assistance Transportation Program (MATP)**
- **The Americans with Disabilities Act (ADA) Program**

All applicants are required to complete Section 1. Section 2 is for the MATP and Section 3 is for ADA eligibility.

**There is a separate application for the State sponsored PwD (People with Disabilities) Program:** If you have a disability and do not meet eligibility requirements of the above programs, you may fill out this application which is available upon request.

### Instructions

- Print out the application.
- Complete the section or sections that apply to you
- Submit your **original application** by mail or in person to the following address

**LANtaVan Paratransit  
1060 Lehigh Street  
Allentown, PA 18103**

**Photocopied, faxed and emailed applications will not be accepted**

Please call 610-432-3200 if you have questions  
or need assistance

**Section 1 – To be completed by all applicants: Please print**

Name \_\_\_\_\_  
Last First Middle

Date of Birth \_\_\_\_\_ Social Security # \_\_\_\_\_ Male \_\_\_\_\_ Female \_\_\_\_\_

Address \_\_\_\_\_ Apt. \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Phone (Home) \_\_\_\_\_ (Work) \_\_\_\_\_ (E-mail) \_\_\_\_\_

What County do you live in? Lehigh \_\_\_\_\_ Northampton \_\_\_\_\_

➤ You must submit a **photocopy** of one of the following documents with this form.

- |                                   |  |
|-----------------------------------|--|
| Birth Certificate                 | Baptismal Record                               |
| Passport or Naturalization Papers | PACE Card                                      |
| Military Discharge Papers         | Drivers license (need not be current)          |
| State Issued I.D. Card            | Letter from Social Security with date of birth |

How many steps are there at the entrance you use at your residence? \_\_\_\_\_

Are there any special instructions that we would need to tell van drivers about service to your residence:

\_\_\_\_\_

\_\_\_\_\_

**EMERGENCY CONTACT**

May we have the name of someone we may contact in case of an emergency? Please select someone who would not be riding in the vehicle with you.

Name \_\_\_\_\_ Relationship to you \_\_\_\_\_

Phone (Home) \_\_\_\_\_ (Work) \_\_\_\_\_ (E-mail) \_\_\_\_\_

*If you are 65 or older and do not have a mobility disability, your application for Shared Ride is complete. Submit this form and proof of age and an ID card will be sent to you shortly.  
If you do have a disability or are seeking service under the Medical Assistance Transportation Program, please complete the information below including Section 2.*

# Section 2 - The Pennsylvania Department of Public Welfare's Medical Assistance Transportation Program

## LANtaVan MEDICAL ASSISTANCE TRANSPORTATION PROGRAM APPLICATION FORM

NOTE: Information contained in this section will be kept confidential.

I am eligible for Medical Assistance transportation from the PA Department of Welfare. Here is my

Access Card Number: \_\_\_\_\_

I am requesting (check one) \_\_\_\_\_ car mileage reimbursement (skip to page 13)  
\_\_\_\_\_ LANtaBus reimbursement (skip to page 13)  
\_\_\_\_\_ LANtaVan service

Do you have a physical or mental disability? \_\_\_\_\_ Yes \_\_\_\_\_ No

**If you do not have a physical or mental disability, this application is complete.**

If yes, tell us what it is and complete the information below: \_\_\_\_\_

\_\_\_\_\_

And please complete the following:

Have you had a disability for more than one year? \_\_\_\_\_ Yes \_\_\_\_\_ No

Is your disability permanent? \_\_\_\_\_ Yes \_\_\_\_\_ No

If no, how long do you expect to have a disability? \_\_\_\_\_

Does your disability change much from day to day? \_\_\_\_\_ Yes \_\_\_\_\_ No

Check every mobility aid you use.

\_\_\_\_\_ Manual Wheelchair \_\_\_\_\_ Guide Dog \_\_\_\_\_ Prosthesis

\_\_\_\_\_ Motorized Wheelchair \_\_\_\_\_ White Cane \_\_\_\_\_ Crutches

3 Wheeled \_\_\_\_\_ \_\_\_\_\_ Cane \_\_\_\_\_ Portable O2

4 Wheeled \_\_\_\_\_ \_\_\_\_\_ Walker \_\_\_\_\_ Leg Braces

Brand Name \_\_\_\_\_ \_\_\_\_\_ Other (explain)

**Do you need a personal care attendant? If you do, you must provide your own and they will ride free whenever you need them for travel. Please complete the following section:**

**PERSONAL ASSISTANCE CERTIFICATION**

What is your disability? \_\_\_\_\_

What mobility equipment do you use? \_\_\_\_\_

I certify that I need the services of a personal assistant to make independent travel possible

A personal assistant is someone designated or employed specifically to assist me with the completion of at least one daily activity on a regular basis.

I will need a personal assistant \_\_\_\_\_ permanently \_\_\_\_\_ temporarily  
\_\_\_\_\_ occasionally. If temporary, provide expected duration \_\_\_\_\_.

I certify that the information provided is true and correct.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Witness (if completed by someone else) \_\_\_\_\_

**Because some medical information that you provide may need to be verified or more information is needed, please complete the following section if you have a disability.**

**RELEASE OF INFORMATION**

I receive services from the following rehabilitation facility, health care professional or agency which is familiar with me. You have my permission to contact them to provide information to LANtaVan about my disability for the purpose of completing this application.

(Please use a separate form for each agency)

My name \_\_\_\_\_

Name of health care or rehab professional who is familiar with me \_\_\_\_\_

\_\_\_\_\_

Agency \_\_\_\_\_

Agency Address \_\_\_\_\_

\_\_\_\_\_ Phone \_\_\_\_\_

I understand that this information will be held by LANtaVan in the strictest confidence and will not be shared with any other person or agency, except the professionals involved in my eligibility determination. This form will permit the professional listed to release information to LANtaVan up to 60 days from the date below:

I also understand that I can revoke this consent at any time by providing written notification.

Signature of Applicant \_\_\_\_\_

Guardian (if appropriate) \_\_\_\_\_

Witness \_\_\_\_\_ Date \_\_\_\_\_

**If you are seeking transportation under the Americans with Disabilities Act because you have a mobility-limiting disability, please complete the information in Section 3.**

## Section 3: The Americans with Disabilities Act Program:

### LANtaVan ADA PARATRANSIT APPLICATION

The purpose of this section is to provide an opportunity for you to describe barriers in the environment and how your disability prevents you from using LANtaBus service. The more information you provide, the better LANtaVan will understand your ability and travel challenges. Information contained in this section will be kept confidential and shared only with professionals involved in evaluating your eligibility.

**In order to be considered complete, every question in this section must be answered. If not, it will be returned to you for completion.**

Will you need further materials in a different format? Circle one.

Braille

Large Print

Audio Cassette

Disk

**Please read the following statements and check those that best describe what you believe is your ability to use LANtaBus service by yourself. You may select more than one.**

- I use LANtaBus service frequently.
- I can use the bus sometimes, if the conditions are right.
- I have difficulty understanding and remembering all of the things I would have to do to find my way to and from the bus.
- I believe I could learn to ride the bus, if someone taught me.
- I have difficulty or cannot climb stairs and can only board a LANtaBus if it has a lift.
- I have a visual disability that prevents me from ever getting to and from the bus, even with training.
- The severity of my disability can change from day to day. I can ride the bus only when I am feeling well.
- I can never use the bus by myself.
- I can get to and from the bus stop if the distance is not too great and the route is barrier free.
- There is no LANtaBus service in my area.
- I am not really sure if I can use the bus.

- My disability makes it impossible to walk to and from the bus, even in good weather.
- I do not want to ride the bus.
- I am not able to use the bus for other reasons. (Please explain): \_\_\_\_\_  
\_\_\_\_\_

**INFORMATION ABOUT YOUR CURRENT USE OF LANtaBus SERVICE**

Do you currently use LANtaBus service at all? \_\_\_\_\_ Yes \_\_\_\_\_ No

When was the last time you independently used LANtaBus service? \_\_\_\_\_

Have you used LANtaBus service by yourself in the past year? \_\_\_\_\_ Yes \_\_\_\_\_ No

Which LANtaBus routes serve your neighborhood? \_\_\_\_\_

If you use LANtaBus service now, which routes do you use? \_\_\_\_\_

If you used to use bus service and stopped, please explain why. \_\_\_\_\_  
\_\_\_\_\_

What is the closest bus stop to your home? Please give the location (Ex: corner of Fifth and Grant)  
\_\_\_\_\_

Can you get to this bus stop by yourself? \_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ Sometimes

If no, why not? \_\_\_\_\_

**TELL US SOMETHING ABOUT YOUR ABILITY TO USE LANtaBus SERVICE**

If you use LANtaBus service now, do you need the assistance of another person?

(Circle One)      Always                      Sometimes                      Never

If you ever need another person's assistance, what does that person do for you?  
\_\_\_\_\_  
\_\_\_\_\_

What is it about riding a LANtaBus that is the most difficult for you? (Ex: The bus moves before I am seated, etc.) Please list as many things as you can think of.

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Can you ever cross the street by yourself? \_\_\_\_\_ Yes \_\_\_\_\_ No

If **Yes**, under what circumstances? \_\_\_\_\_

---

Are you sometimes accompanied by someone who helps you with travel outside your home or when you get to your destination? \_\_\_\_\_ Yes, sometimes \_\_\_\_\_ Yes, always \_\_\_\_\_ No

### **TRAVEL/MOBILITY TRAINING**

Have you ever received training to learn how to use the bus or travel around the community?  
\_\_\_\_\_ Yes \_\_\_\_\_ No

If **yes**, which agency or person provided the training? \_\_\_\_\_

When were you trained? \_\_\_\_\_

Did you successfully complete training? \_\_\_\_\_ Yes \_\_\_\_\_ No

If **no**, why not? \_\_\_\_\_

Was your training route specific? \_\_\_\_\_ Yes \_\_\_\_\_ No

Which routes did you learn? \_\_\_\_\_

Would you like to participate in free training to learn to ride the bus? \_\_\_\_\_ Yes \_\_\_\_\_ No

### **WEATHER RELATED CONSIDERATIONS**

Does the weather affect your ability to use LANtaBus service? \_\_\_\_\_ Yes \_\_\_\_\_ No

If you answered **yes**, please explain how:

---

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**THE ENVIRONMENT AROUND YOUR HOME**

How many steps are there at the entrance you use at your residence? \_\_\_\_\_

Can you get to the LANtaVan vehicle without the help of another person? \_\_\_\_Yes \_\_\_\_No

If no, why not? \_\_\_\_\_

How would you describe the terrain where you live? (Ex: steep hill, flat, long gradual hill, etc.)  
\_\_\_\_\_

Are there sidewalks in your neighborhood? \_\_\_\_Yes \_\_\_\_No

**YOUR CURRENT TRAVEL**

List your four most frequent destinations and how you get there now.

Destination address	How often you go there	How you get there now
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

**YOUR FUNCTIONAL ABILITY**

Your answers to these questions will help us better understand your functional ability in specific areas. For each question, circle one answer. Your answers should be based on how you feel most of the time, under normal circumstances, using your mobility equipment, and whether you can perform this activity independently.

**Without the help of someone else, can you:**

**1. Walk up and down three steps if there are handrails on both sides?**

Always                      Sometimes                      Never                      Not sure

**2. Use the telephone to get information?**

Always                      Sometimes                      Never                      Not sure

**3. Travel one level block on the sidewalk when the weather is good?**

Always                      Sometimes                      Never                      Not sure

**4. If you are able to do this, how long does it take you?**

- |  |                        |                     |          |
|--|------------------------|---------------------|----------|
|  | Less than five minutes | Five to ten minutes | Not sure |
|--|------------------------|---------------------|----------|
5. **Cross the street, if there are curb cuts?**

	Always	Sometimes	Never	Not sure
--	--------	-----------	-------	----------
  6. **Ride up and down a wheelchair lift with handrails on both sides?**

	Always	Sometimes	Never	Not sure
--	--------	-----------	-------	----------
  7. **Travel three level blocks on the sidewalk, when the weather is good?**

	Always	Sometimes	Never	Not sure
--	--------	-----------	-------	----------
  8. **If you are able to do this, how long does it take you?**

	Less than ten minutes	Ten to fifteen minutes	Not sure
--	-----------------------	------------------------	----------
  9. **Wait 10 minutes in good weather outdoors without a place to sit?**

	Always	Sometimes	Never	Not sure
--	--------	-----------	-------	----------
  10. **Step on and off the curb from a sidewalk?**

	Always	Sometimes	Never	Not sure
--	--------	-----------	-------	----------
  11. **Travel up or down a gradual hill on the sidewalk, if the weather is good?**

	Always	Sometimes	Never	Not sure
--	--------	-----------	-------	----------
  12. **Find your own way to the bus stop, if someone shows you the way once?**

	Always	Sometimes	Never	Not sure
--	--------	-----------	-------	----------
  13. **Currently travel by yourself?**

	Always	Sometimes	Never	Not sure
--	--------	-----------	-------	----------
  14. **If you need the assistance of another person, what do they do for you?**


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---
  15. **Have you ever gotten lost when traveling alone? (Circle One)**

	Yes	No, I never travel outside alone	No, I've never gotten lost
--	-----	----------------------------------	----------------------------
  16. **If yes, were you able to find your way back?**

Yes

Yes, with help

No

**17. If you weren't able to find your way back, what did you do?**

\_\_\_\_\_

**18. If the weather is good and there are no barriers in the way, what is the farthest you can walk or travel outdoors on a level sidewalk using your mobility aid?**

\_\_\_\_\_ I can't travel outdoors alone at all

\_\_\_\_\_ Less than 1 block

\_\_\_\_\_ Curb in front of my house

\_\_\_\_\_ 3 blocks

\_\_\_\_\_ 6 blocks

\_\_\_\_\_ 9 blocks

\_\_\_\_\_ More than 9 blocks

\_\_\_\_\_ Not sure

\_\_\_\_\_ Other (explain)\_\_\_\_\_

**Please use this space to tell us anything else you would like us to know about your travel challenges and your ability to use LANtaBus service.**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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\_\_\_\_\_

\_\_\_\_\_

**The questions in this section are designed to give us a better understanding of your opinions about certain aspects of accessible fixed route bus service. Please read each question carefully and circle the number that indicates whether you agree, disagree, or are not sure.**

	Agree	Disagree	Not Sure
1. The bus system is too complicated for me to figure out.	1	2	3
2. I've heard really good stories about LANtaBus service from other people.	1	2	3
3. I'm not at all interested in using LANtaBus service for my transportation.	1	2	3
4. I have to have a seat on the bus, and I'm afraid I won't get one.	1	2	3
5. Everyone on the bus will be inconvenienced since it takes me longer to get on. People will get angry.	1	2	3
6. Riding the bus makes me more vulnerable to crime. I'm afraid for my safety.	1	2	3
7. I think my neighborhood has good bus service.	1	2	3
8. I'm afraid I'll get off at the wrong stop.	1	2	3
9. Arriving at my destination on time is not very important to me.	1	2	3
10. Lower LANtaBus fares compared to LANtaVan are an incentive for me to ride the bus.	1	2	3
11. Taking my trips by bus would take too long.	1	2	3
12. I need help with the tie downs and I don't think the LANtaBus driver will help.	1	2	3
13. I'd have to get up earlier in the morning to use the bus, which would be a problem.	1	2	3
14. Lifts on buses break often. I don't think the service is reliable.	1	2	3
15. If the bus moves before I'm seated, I'm afraid I might fall.	1	2	3

**Please review this section to make sure you have answered all of the questions to the best of your ability. Be sure you have completed every page and signed the form. Thank you.**

Were you helped by another person in the completion of this section? If yes, who helped you?

Name \_\_\_\_\_ Daytime Phone \_\_\_\_\_

Address \_\_\_\_\_

Relationship to you \_\_\_\_\_

How did this person assist you? \_\_\_\_\_

I understand that the purpose of this section is to determine if I am eligible to ride LANtaVan, and that LANtaVan staff may need to talk to me later to get more information. I certify that I have been truthful in answering this section, and that the information I have provided is correct.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Please review this section to make sure you have answered all of the questions to the best of your ability. Be sure you have completed every page and signed the form. Thank you.**

# **LANtaVan Paratransit Appeals Process**

## **Right to appeal**

The ADA requires that transportation providers establish a process for persons to appeal decisions if they are denied access to Paratransit service.

LANta has established an appeals procedure for persons whose applications for Paratransit eligibility are denied or for persons who have received suspension notices for other reasons.

An individual may file an appeal when LANta denies Paratransit service for any of the following reasons:

- Denial of Eligibility
- Suspension resulting from excessive No-Shows or Cancellations
- Suspension for Disruptive Behavior

## **The appeals process**

LANta will inform an applicant or current customer of a decision to deny eligibility status or to suspend service by letter.

Requests to appeal a denial of eligibility must be received within 60 days of the date on the eligibility denial letter. Requests to appeal a suspension must be received within 10 calendar days of the date of the notice of suspension letter.

Requests for an appeal must be sent in writing to the ADA Administrative Appeals Committee at the following address:

Manager, ADA Programs  
Attn: ADA Appeal Request  
LANTA  
1060 Lehigh Street  
Allentown, PA 18103

Once the request for an appeal is received, it will be reviewed by an Appeals Committee.

The Appeals Committee consists of two LANTA staff members who were not involved in the original service suspension decision, and a volunteer from the Lehigh Valley Center for Independent Living (LVCIL).

The Appeals Committee will issue a written decision within 30 days of the appeal hearing. The decisions of the Appeals Committee shall be final.

LANTA is not required to provide service to individuals who are pursuing an eligibility appeal. However, if the Appeals Committee has not made a decision within 30 days after the hearing, temporary service will be provided. This temporary service will continue until a decision on the appeal is reached.

Persons requesting an appeal will be notified in writing of the time, date and location of the appeal hearing. Individuals are encouraged to attend the appeal hearing although attendance is not mandatory. If Individuals requesting appeals cannot attend, they may request a telephone interview or have another person(s) represent them at the hearing. If the individual or a designated representative is not present at the appeal hearing, the Appeals Committee decision will be based on the documentation submitted. All copies of the appellants' application and all supporting materials used in the appeals process will remain confidential.

Upon appeal for a No-Show or Cancellation suspension, Paratransit service will be provided pending the appeal; suspension of service will not begin until the appeals process is complete. If a decision is not made within 30 days of the completion of the appeal hearing, the individual appealing the suspension shall be granted service until a final decision has been reached.

**Attachment B**

**FTA Notification Letter**





U.S. Department  
Of Transportation  
**Federal Transit  
Administration**

Headquarters

East Building, 5<sup>th</sup> Floor - TCR  
1200 New Jersey Ave., SE  
Washington, D.C. 20590

January 30, 2009

Armando V. Greco  
Executive Director  
Lehigh And Northampton Transportation Authority  
1060 Lehigh Street  
Allentown, Pa 18103

Dear Mr. Greco:

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the Americans with Disabilities Act of 1990 (ADA) and the Department of Transportation's (DOT) implementing regulations at 49 CFR Parts 27, 37, and 38, as they relate to public transportation. As part of our ongoing oversight efforts, FTA's Office of Civil Rights conducts a number of on-site compliance reviews of ADA complementary paratransit services. Lehigh And Northampton Transportation Authority (LANTA) has been selected for such a review. The focus of the review will be LANTA's compliance with the six paratransit service criteria outlined in the DOT ADA regulations at 49 CFR § 37.131.

The overall review process will consist of the collection of data prior to the visit, an opening conference, an on-site review of LANTA's ADA complementary paratransit service and an exit conference. The entire on-site portion of the review will be completed within four days. FTA has engaged the services of Planners Collaborative Inc. (PCI), of Boston, MA, with TranSystems Corp. of Medford, MA, to conduct the compliance review. Representatives of PCI, TranSystems, and FTA will participate in the opening and exit conferences. Mr. Jonathan Klein, Program Manager for this review, has already contacted your organization to notify you of the on-site visit and has confirmed Monday, April 27, 2009, for commencement of the on-site visit.

We request 9 a.m. for the opening conference. This will provide an opportunity for an introduction of the FTA representatives and PCI and TranSystems reviewers to members of your organization, including you or your designee, the ADA complementary paratransit services manager, the ADA coordinator, and other key staff. During the opening conference, PCI and TranSystems will present an overview of the on-site review.

Because the members of the review team will be spending considerable time reviewing LANTA's paratransit service, it would be helpful if you could provide them with temporary identification to permit easy system access. We also request that you identify a LANTA staff contact to coordinate the on-site review and address questions that may arise during the review. In addition, we request that a work area be made available to the team in the building where the opening and exit conferences take place.

In order that we may properly prepare for the on-site visit, we request that you provide the information outlined in Enclosures 1 and 2. Enclosure 1 consists of items that must be received within 21 calendar days of the date of this letter. These materials should be forwarded to:

Jim Purdy  
Planners Collaborative, Inc.  
122 South Street  
Boston MA 02111  
617-338-0018 x18  
617-338-4228 fax  
*jpurdy@thecollaborative.com*

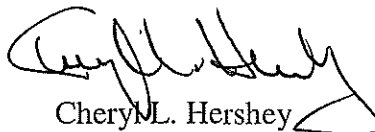
Enclosure 2 consists of items that will be needed at the initiation of the review.

We request that the exit conference be scheduled for 2 p.m. on Thursday, April 27, 2009. This conference will afford an opportunity for the reviewers to discuss their observations with you and your organization. We request that you or your designee, the ADA complementary paratransit services manager, the ADA coordinator, and other key staff attend the exit conference. Findings will be made by the FTA Office of Civil Rights and provided to you in a written draft at a future date. You will then have an opportunity to provide comments before the report becomes final. When the report is final, it will be a public document and subject to the Freedom of Information Act upon request.

LANTA staff are welcome to accompany the review team during the review, if you so choose. We welcome your suggestions and encourage your participation in the review by asking questions or commenting on any issues you may feel are relevant. If you have any questions or concerns prior to the opening conference, please contact Jonathan Klein at 202-366-0809 or at his e-mail address: *jonathan.klein@dot.gov*. You may also contact Mr. Purdy, whose contact information is included, above.

Thank you for your assistance and cooperation as we undertake this process together. We look forward to a meaningful and successful review.

Sincerely,



Cheryl L. Hershey  
Director  
FTA Office of Civil Rights

Enclosures

cc: Letitia Thompson, FTA Region III Administrator  
Michael McCollum, FTA Region III Director of Program Management & Oversight  
Sandra McCrea, FTA Office of Civil Rights  
Jim Purdy, PCI

## Enclosure 1

The following information must be submitted to Planners Collaborative Inc. within 21 calendar days from the date of this letter.

1. A description of how the ADA complementary paratransit service is structured and provided, including:
  - How trip requests/reservations are handled (by a central reservation office? by each carrier?), and the address(es) where reservations are taken.
  - How trips are scheduled (by a central scheduling office? by each carrier?) and the address(es) where scheduling is done.
  - How dispatching is handled (centrally? by each carrier?) and the address of the central dispatch office or the carrier dispatch sites).
2. A copy of the current broker and carrier contract(s), if service is contracted out in part or in total.
3. A copy of your ADA complementary paratransit "Operator Manual" (or copies if each carrier uses their own), and copies of your "Rider Handbook," service brochure, or other document that explains how trips are requested and service is provided.
4. A description of ADA complementary paratransit service standards, including:
  - The on-time performance standards (how is "on-time" defined and what is the goal for their percentage of trips provided within the standard?).
  - What standards have been set regarding acceptable numbers or percentages of trip denials?
  - The travel time standard (what travel time is considered comparable or too long and what is the goal for the percentage of trips provided within this standard?).
5. Telephone call-handling standards (what is the standard for hold time and/or call pickup and what is the goal for their percentage of calls within this standard?).
6. Samples of driver manifests as identified in Item 1 of Enclosure 2 in this correspondence and samples of records or reports or tabulations of the information requested in Item 2 of Enclosure 2.
7. Capital and operating budget and expenditures for ADA complementary paratransit services for the three most recent fiscal years, including the current year.
8. The number of ADA complementary paratransit trips served and trips denied for the three most recent fiscal years, including the current year.
9. Three copies of the system map for fixed route services.

## Enclosure 2

We request that the following information be available at the beginning of the on-site visit.

1. Copies of completed driver manifests for the most recent six-month period (for each carrier).
2. The following ADA complementary paratransit data, by month, for the last six months:
  - Trips requested
  - Trips scheduled
  - Trips denied
  - Canceled trips
  - No-shows
  - Missed trips
  - Trips provided
  - A breakdown of trips requested, scheduled, and provided by recognized geographic areas, communities, or zones (however you divide the area).
  - A listing of trips denied each month showing customer's name, origin, requested destination, day and time, and if the person was ambulatory or uses a wheelchair.
  - On-time performance information (by carrier if there are multiple carriers in the system).
  - A listing of trips that exceeded the trip length standard showing the customer name, origin, destination, day and time, if the person was ambulatory or uses a wheelchair; and the total time on-board.
  - Telephone call management records (if available) showing hold times by day and time, total call volume, calls answered and abandoned, etc.
3. A list of complaints related to ADA complementary paratransit capacity constraints in the past year. The list should include all complaints related to trip denials, trip limits, on-time performance, lengthy trips, phone capacity issues, etc. showing customer's name, trip origin, date and type of complaint, carrier, and resolution (any corrective actions requested and taken).

## **Attachment C**

### **On-Site Review Schedule**

**ADA Complementary Paratransit Service Review  
Lehigh and Northampton Transportation Authority (LANTA)  
Allentown, PA  
April 27-30, 2009**

**Schedule**

<b>Time</b>	<b>Activity</b>	<b>Who</b>	<b>Where</b>
<b>Monday, April 27, 2009</b>			
9:00 a.m.	➤ Opening Conference	All	LANTA, 1060 Lehigh Street, Allentown
9:30 a.m.	➤ Review information requested & policies & procedures	All	LANTA
10:30 a.m.	➤ Review Metro Plus complaints ➤ Review budget and resources ➤ Review fixed route paratransit criteria	Procopio Gerty Purdy	LANTA
12 noon	➤ Travel to Eastern Coach/lunch	All	
1:30 p.m.	➤ Tour facility ➤ Observe call-takers; record trip request information	All	Easton Coach, 1200 Conroy Place, Easton
4:00 p.m.	➤ Review telephone system and performance ➤ Observe dispatch	Purdy Procopio, Gerty	EC
<b>Tuesday, April 28, 2009</b>			
8:00 a.m.	➤ Observe dispatch ➤ Observe call-takers; record trip request information	Procopio Gerty, Purdy	EC
10:00 a.m.	➤ Begin analysis of on-time performance ➤ Interview scheduler	Purdy Procopio, Gerty	EC
1:00 p.m.	➤ Continue review of on-time performance ➤ Review vehicles, interview drivers	Purdy Gerty, Procopio	EC
4:00 p.m.	➤ Interview drivers ➤ Observe dispatch/scheduling	Gerty, Purdy Procopio	EC
<b>Wednesday, April 29, 2009</b>			
8:00 a.m.	➤ Conduct eligibility review ➤ Conduct travel time analysis ➤ Continue analysis of on-time performance, service criteria	Gerty Procopio Purdy	LANTA
1:30 p.m.	➤ Conduct additional observations of operations ➤ Interview trainers (operator & customer service reps)	All	EC
4:00 p.m.	➤ Interview drivers ➤ Preliminary debrief for FTA	Purdy, Procopio Gerty	EC
<b>Thursday, April 30, 2009</b>			
Morning	➤ Complete preliminary data analysis & remaining detail work ➤ Prepare materials for debriefing session	All	TBD
*1:30 p.m.	➤ Exit Conference	All	LANTA

\*Note time change

**Attachment D**

**Metro Plus Customer Ride Guide**

## **Metro Plus: Customer Ride Guide**

### **Introduction**

The Lehigh Valley's paratransit service is called Metro Plus. The service is provided under contract with Easton Coach Company, Easton, PA. A fleet of 120 vehicles is dedicated to this service and more than 2,000 trips are taken on the system daily.

The Metro Plus Ride Guide is designed to inform paratransit customers about special transportation service available in Lehigh and Northampton Counties. This handbook includes policies and procedures, rules and regulations, and guidelines for use of the Metro Plus system. The handbook will answer most questions about Metro Plus operations. All paratransit customers should review this handbook carefully and refer to it whenever questions arise.

Metro Plus is a coordinated, shared-ride transportation service. A number of programs and agencies sponsor passengers who all ride on the same vehicles.

*The Medical Assistance Transportation Program (MATP) – a fare subsidy program for people who are financially disadvantaged and who need to access medical services – has different service elements than are outlined here. Please refer to the special brochures that have been prepared for MATP customers.*

For additional information about your specific transportation needs, please contact: 610-432-3200 or email [lantabuspa@lantabus-pa.gov](mailto:lantabuspa@lantabus-pa.gov)

### **Metro Plus Paratransit Service**

Metro Plus service is designed to meet the transportation needs for people sponsored by a variety of programs. Some but not all of the programs are listed below. At least one of the sponsoring programs, the Department of Welfare's Medical Assistance Transportation Program, has its own set of 'rules and regulations so please refer to brochures that describe that program for more detailed information.

The Pennsylvania State Lottery Shared Ride Program;  
Medical Assistance Transportation Program, PA Department of Welfare;  
The Americans with Disabilities Act program  
The Persons with Disabilities fare discount program;  
Various other social and governmental fare subsidy programs.

These programs and their eligibility requirements are described below in general terms. Specific brochures providing greater detail are available and are sent to all customers granted eligibility within each program.



Metro Plus is a paratransit van service that is specially equipped with wheelchair lifts and other accessibility features that allow for maximum mobility for customers with disabilities.

Metro Plus operates on a demand-response basis at a reduced fare for residents and visitors within Lehigh and Northampton Counties limits who are registered and certified as eligible for sponsorship through available programs.

Metro Plus is also a public transportation service open to the general public for full fare.

Metro Plus operates during the same hours that LANTA Metro city transit services are available: 7:00 am - 7:30 pm on weekdays and Saturdays, and 9:00 am – 7:15 pm on Sundays. On weekdays and Saturdays, there is also evening service available in the area served by Metro's Starlight service from 7:30 to midnight. Starlight times vary by route, so consult these schedules to see if Metro Plus service will be available.

**Eligibility:**

- 1) The Pennsylvania State Lottery Shared Ride Program is a program only for people 65 and older who cannot ride or do not have access to the regular Metro, city transit bus services. An application and proof-of-age is required for eligibility. Customers pay 15% of the total trip cost; the balance is paid through State Lottery proceeds.
- 2) The Medical Assistance Transportation Program through the Pennsylvania Department of Public Welfare must meet the income categories that DPW maintains. The purpose of this program is to provide people who are financially disadvantaged with access to transportation to access necessary medical treatment. The DPW pays the full fare for people who are eligible for this program. An eligibility application is required as well as a check on eligibility within the State DPW database for both the person and the services accessed. The lowest cost, most effective transportation mode is selected for each customer and these range from reimbursement for auto mileage expense, to reimbursement of regular Metro city transit fares, to free access to Metro Plus paratransit service.
- 3) The Americans with Disabilities Act of 1990 made it a civil protection under the law for people with disabilities to have access to federally-sponsored public transit services. Persons with disabilities in the community who, because of their disability are prevented from boarding a LANTA Metro city transit bus that operates within  $\frac{3}{4}$  (three-quarter) mile of their home may ride Metro Plus.

- 4) The Persons with Disabilities (PWD) program is available to people who do not live within the ADA service area and who are not sponsored by any other available program. Eligibility is determined through a submission of a written application with a medical professional's verification. Metro Plus staff will assess whether or not there are other programs in the community that could underwrite the fare or discount the fare to the passenger applying. PWD fares are the same as Shared Ride fares (15% of the total trip cost).

## **ADA**

There is confusion about what people with disabilities achieved in terms of mobility through the Americans with Disabilities Act of 1992. It is a civil rights law that extended the right to use existing public transit services funded by federal dollars, in the same way as anyone else in the community. It was not a service expansion program.

The ADA is a civil rights law, not a transportation law, or a social program. The ADA requires non-discriminatory access to fixed-route service, with complementary paratransit service acting as a "safety net" for people who cannot use the regular bus system.

Under the ADA, complementary paratransit service is not intended to be a comprehensive transportation system for people with disabilities. In other words, the ADA does not attempt to meet all the transportation needs of people with disabilities. Instead, the ADA is intended to provide individuals with the same mass transit opportunities as everyone else in the community. The paratransit system must be 'equal' to the fixed-route system. For example, the service area and days/hours of service for paratransit and fixed-route service must be the same.

As of July 2006, all Metro city buses are equipped with wheelchair ramps, "kneeling" mechanisms, and other features making the transit system fully accessible to people with disabilities. Many people who use Metro Plus are now able to ride the regular buses.

In April, 2007, LANTA introduced a special \$1.00 all day pass for people with disabilities to encourage the use of the regular public transit system instead of the Metro Plus door-to-door services. The only restriction on this pass is that it is not valid during the peak hours of 7 a.m. and 8 a.m. and 4:30 to 5:30 p.m.

For eligibility requirements for this dollar daypass please call 610-432-3200.

Eligibility Standards for ADA paratransit:

Individuals are eligible for Metro Plus paratransit service if they are prevented from using the regular fixed-route system due to a physical or cognitive disability. An individual is eligible if he or she lives within  $\frac{3}{4}$  (three quarter) miles of a LANTA fixed-route bus route (ADA service area) and has a permanent or temporary disability as described below. As noted, the PwD program provides eligible customers with access to the Metro Plus service outside the ADA service area.

## **Permanent Disabilities**

### CATEGORY 1

Category 1 consists of persons who are unable to board, ride, or disembark from the bus even if they are able to get to the stop and the bus is accessible. Persons in this category include individuals with mental or visual impairments who cannot navigate the bus system. Examples of navigating the system include recognizing destinations and understanding the transfer process.

### CATEGORY 2

Category 2 consists of persons who cannot use buses without wheelchair lifts or other accommodations. These persons are eligible for paratransit service if accessible buses are not available on the fixed-route on which they want to travel.

### CATEGORY 3

Category 3 consists of persons with specific impairment-related conditions who cannot travel to a bus stop or from a bus stop to their final destination. The specific impairment-related condition must prevent the person from using regular, fixed-route transit. A person is eligible if traveling to and from a bus stop is impossible when architectural and/or environmental barriers are combined with the specific impairment-related condition.

## Temporary Disabilities

The standards for eligibility are the same as those for permanent disabilities. Persons with temporary disabilities who are eligible for service will be provided service only for the duration of their disability.

## **Conditional/Unconditional Eligibility**

In all cases, eligibility will be determined either “conditional” or “unconditional.” An individual with “conditional eligibility” is one who is approved for some trips or under certain conditions. An individual with “unconditional eligibility” is one who is approved for all trips.

## **Application and Certification Process**

To apply for Metro Plus service, the prospective user must complete an application packet. Application packets may be obtained through the Customer Service Department at 610-432-3200. Only original applications will be accepted, no duplicated or photocopied applications. Prospective customers must contact Metro Plus for an original application. Applications must be returned via mail or in persons; no applications will be accepted via electronic means such as fax machines.

Applications are available at LANTA's website: [www.lantabus-pa.gov](http://www.lantabus-pa.gov) However, the application cannot be completed online. It must be printed out, completed, signed and mailed (not sent via fax) to LANTA, 1060 Lehigh St, Allentown, PA 18103.

**The ADA Paratransit Eligibility application is divided into three (3) sections:**

Part 1 - General Information/Applicant Certification

This section must be completed by the applicant or their representative. The applicant **MUST ANSWER ALL QUESTIONS** in this part and the applicant's signature is required. The applicant must provide all requested information including identifying persons (if any) who assisted them with the application. All information given will be verified, and providing false or misleading information will result in denial/termination of service.

Part 2 – Proof of Age

This section lists the documents that are accepted as proof of age. A photocopy of the document is required with the application.

Part 3 - Professional Verification

This section must be completed by a physician who is familiar with the applicant's disability. The physician who verifies the applicant's disability should consider only the presence of a disabling condition, not the applicant's age or economic status. The application must contain information about what prevents the applicant from using regular LANTA Metro bus services.

**Application Policies and Procedures**

Within twenty-one (21) days of receiving a completed application, the ADA application will be processed and Metro Plus will inform the applicant of their eligibility determination. Please note that an application is only considered complete when all information is provided, any omission renders an application incomplete. Incomplete applications will be returned to the applicant, and the 21 days will not start until the completed application is returned to Metro Plus.

If an application is approved, the applicant will receive a Metro Plus ID Card. This card allows an applicant to schedule rides with Metro Plus. Each rider is given an identification number that appears on the ID Card. The card can be used as identification for paratransit service on other transit systems if you are traveling out of town.

The ID Card will be wallet-sized, and will contain the following information:

1. Name of the eligible individual and the unique ID number
2. Name of the transit provider (Metro Plus)
3. Metro Plus telephone number
4. Expiration date if any
5. Conditions - including the use of a Personal Care Attendant (PCA)
6. The eligible individual must sign the ID card in the space provided.

If the application is denied, the applicant will receive a letter explaining the reason or reasons for the denial. Also included will be instructions on filing an appeal.

If Metro Plus has not made a determination of eligibility within 21 days following the receipt of a completed application, the applicant will be treated as eligible and provided service until and unless the individual is determined to be ineligible for paratransit service.

### Recertification

All Metro Plus paratransit customers may be required to recertify at reasonable intervals. A recertification packet will be mailed to you well in advance in order to allow maximum time for the process. In some cases, you may be asked to fill out and submit a new application.

### **Important Points to Remember**

**Metro Plus is a limited, special transportation service.**

- 1) Metro Plus eligibility does not include persons who find it uncomfortable or difficult to get to and from bus stops.
- 2) The physician who verifies the applicant's disability should consider only the presence of a disabling condition and how that condition affects the person's mobility with regard to riding a bus, not the applicant's age or economic status or diagnosis.
- 3) Paratransit eligibility is a transportation decision, not a medical one. A doctor's letter certifying disability will no longer be the sole criteria for riding Metro Plus. Metro Plus alone will determine paratransit eligibility.

### **Fares and tickets**

Metro Plus is not a free service. A Metro Plus customer either pays a fare or has a sponsor who pays for fares.

If a customer is self-pay, tickets are required to ride Metro Plus. These are available through LANTA's Customer Service Department, at various locations throughout the Counties, or may be purchased by mail.

Tickets must be purchased in advance.

If a customer has a sponsor, the sponsor informs Metro Plus in writing that they are going to pay for the customer's trip costs. These customers do not need tickets.

Please contact Metro Plus or refer to a current brochure for fare and ticket prices.

### **Visitor Policy**

Metro Plus will honor paratransit certifications from other transit systems. An individual from out of town requesting service must present proof of their certification. A letter stating paratransit eligibility is acceptable. Documentation must include the name of the eligible individual, the name of the certifying paratransit provider, the telephone number of the provider's paratransit coordinator, an expiration date (if any), and any conditions or limitations on eligibility. If the individual has indicated the need for a Personal Care Attendant (PCA), this must be noted in the documentation.

If the person does not have an identification card or other documentation from their local area, Metro Plus will require the person to provide the scheduler with documentation of their place of residence, and their disability if the disability is not apparent. Metro Plus will not provide service to a visitor for more than twenty-one (21) days from the date of the visitor's first paratransit trip; visitors will be required to apply for Metro Plus in order to receive transportation beyond this twenty-one (21) day period. However, the twenty-one (21) days can be consecutive or divided over several shorter visits. A visitor who expects to be in the Lehigh Valley area for more than twenty-one (21) days should apply for a Metro Plus card as soon as possible after arriving in the area served by Metro Plus.

### **Description of Metro Plus Paratransit Service**

Metro Plus is a 'door-to-door' service which means drivers will accompany passengers to and from the front doors of the origins and destinations if necessary. Under no circumstances is a driver required to go 'through the door' on either a pick-up or a drop-off.

All trips must be scheduled by calling Easton Coach, the Metro Plus service provider, at 610-253-8333. For those out of the calling area, call 800.253-8333. Trip reservations are accepted from 8:00 am to 4:00 pm, Monday through Friday.

## **Scheduling Trips**

When scheduling a paratransit trip, the following information is required: name, ID number ; trip date and appointment time; pick-up address; destination address; number of guests (companions), if any; accompanying Personal Care Attendant (PCA), if applicable; and, if a return trip is desired, the return time for.

Metro Plus provides “next-day service.” This means that requests for trips for a particular day may be made any time during the preceding day. However, Metro Plus requests a minimum of two to three day notice be given for adequate scheduling of a trip. Customers may make ride reservations up to fourteen (14) days in advance.

A trip is defined as beginning with the pick-up location and ending at the destination location. An individual may books several trips during the same telephone call for reservations. The customer may also set up a ‘standing order’ reservation.

A standing order is a trip or series of trips that are booked to continue on a repetitive basis without the customer having to call frequently to arrange service. For example, a customer may travel three times a week for medical treatment so he/she ‘books’ that trip in advance and it repeats until the customer calls to cancel it. Similarly, a work commute schedule would include daily service.

Customers should be ready to go fifteen (15) minutes prior to their scheduled pick-up time. A pick-up is considered “on-time” if it occurs within fifteen (15) minutes before or fifteen (15) minutes after the scheduled time. The driver will notify the dispatcher if the van will be more than fifteen (15) minutes late, so that the dispatcher can attempt to contact the rider and inform them of the new estimated pick-up time.

Drivers will wait 5 minutes for a passenger when the van arrives within the on-time window. An attempt will be made to alert the passenger that the van has arrived.

If a passenger is going to be late or decides at the last minute that they do not wish to travel that day, we would appreciate it if we are informed. Please call the Metro Plus reservation telephone number to report change.

Metro Plus has peak demand similar to the regular city transit system. Therefore, when it is in the passengers’ discretion, it is advisable to make appointments and plan trips in the midday hours from 9 a.m. to 1:30 p.m.

## **Trip Purpose**

According to the ADA, no trips can be given priority. Medical trips, work trips, and recreational trips are handled on an equal basis

There are no restrictions on trip purpose. All requests for trips are accepted on a first-come, first-served basis. There are no 'wait-lists' – any trips that are booked are provided.

## **Trip length**

The area served by Metro Plus is large: more than 1,600 square miles! Many trips across the Valley are very long even when taken by car or bus. We try to make the customer's trip as efficient as possible so that no one is on board the vehicle for an unreasonable period of time. As a measure of service quality, Metro Plus compares the trip length to what it would take to get from an origin to a destination by regular bus - including transfers between buses - and the length of time to cover the distance from home to bus stop and from bus stop to the destination. Generally, Metro Plus trips are well within these criteria.

If you feel your trip is unreasonably long or not logically scheduled, call 610-253-4055 and ask to speak with a supervisor to review the situation.

## **Rules and limitations**

What Operator Assistance is Provided? The driver:

WILL assist a customer to and from the van.

WILL pull into apartment complex areas, parking lots, or behind commercial buildings if the van can be safely parked and the lift deployed.

WILL for the sake of time, assist a customer with articles, i.e. shopping bags, grocery bags, etc. For practicality, no more than three shopping bags will be permitted. The driver is not permitted to take articles into a customer's residence.

WILL NOT wait longer than five (5) minutes for a customer to appear for their scheduled pick-up as long as the driver is within the 15 minute pick up window.

WILL NOT leave if the customer is within sight of the van and is attempting to make their way to the van.

WILL NOT leave the van unattended, out of sight, with the engine operating.

WILL NOT assist any customer into or out of their house or any other facility.



WILL NOT transport any customer who is too ill to sit up and be secured in their seat, nauseous, vomiting, or bleeding. In such instances, the driver will first notify dispatch of the customer's condition and then, if necessary, advise medical authorities of either the customer's need for medical attention or that they must remain at the medical unit until they are well enough to travel on the van.

### **Guests (companions)**

Customers who are ADA paratransit eligible will be allowed to travel with at least one guest (companion), such as a friend or relative. The fare for the companion will be the same as the fare for the ADA paratransit eligible customer.

Additional guests accompanying the customer will be allowed on a space available basis only and will be charged the discounted co-pay fare.

Please note that Metro Plus requires that the Metro Plus customer reserve a space for the companion when the customer reserves their own ride. The companion must have the same trip origin and destination as the customer.

An approved Metro Plus rider may not ride free as a PCA for another Metro Plus rider.

### **Personal Care Attendant (PCA) - Escort**

A Personal Care Attendant (PCA) is someone designated or employed specifically to assist the paratransit eligible individual in meeting their needs. Metro Plus recognizes that a PCA is a mobility aid to the eligible customer. The PCA must have the same trip origin and destination as the customer. In addition, Metro Plus requires that space for the PCA must be reserved at the same time that the customer reserves their trip. No fare is required for a PCA.

The customer may take along a companion in addition to the PCA. It should be remembered that a family member or friend is regarded as a companion accompanying the customer, and not as a PCA, unless the eligible customer regularly makes use of a PCA and the family member or friend is acting in that capacity.

Metro Plus may determine that a PCA or companion is required for persons who repeatedly become ill or suffer behavioral problems while riding in the Metro Plus van.

### **Securement / Tie downs / seat belt use**

Metro Plus paratransit customers are required to use seat belts or securement devices at all times. Refusal to use seat belts or the appropriate securement

system will result in the suspension of service. However, if a particular mobility device cannot be secured by the existing securement system, services will not be suspended.

All common wheelchairs and their users can be transported by Metro Plus. A common wheelchair is a wheelchair that does not exceed thirty (30) inches in width, forty-eight (48) inches in length, and does not weigh more than six hundred (600) pounds when occupied.

All wheelchair users must ride in designated securement areas only. Persons who are not wheelchair users, but use other mobility aids will be allowed to use the lift mechanism provided that the mobility aid can be physically accommodated by the vehicle and its equipment.

Collapsible (folding) wheelchairs may be carried on all vans.

Ambulatory customers who require the lift to board may use these wheelchairs to facilitate entry into the van.

Children, 8 years of age and under, will NOT be transported without child safety or booster seats as required by Pennsylvania state law.

### **Other mobility aids/equipment:**

Customers may travel with service animals trained to assist them. Service animals include guide dogs used by customers with vision or hearing impairments, as well as dogs or other animals that provide aid to customers with mobility impairments. The customer must inform the scheduler that they are traveling with a service animal when they make their trip reservation.

Customers may also travel with *portable* oxygen or other equipment, provided that the equipment does not violate rules concerning transportation of hazardous materials.

All oxygen tanks must be secure while in transit.

Customers must provide their own oxygen supply sufficient for the duration of the trip. Please note: occasionally there are delays in service due to a variety of reasons. Customers would be prudent if they brought along a spare portable oxygen tank.

### **No-shows / Cancellations / Destination Changes**

A “no-show” is recorded when: a customer books a trip and, when the van arrives, the customer is not available for travel or waves the driver on. The van driver will wait 5 minutes past the scheduled pick-up range of time.

No-shows do not include trips that are missed for reasons that are beyond the customer's control for, instance; scheduling problems, late pick-ups, and other operational problems. An example of a no-show beyond the customers control would include a situation where the van is late and the customer has found an alternate source of transportation.

No-shows and cancellations can result in a denial of service to other customers. That is, a no-show or a cancellation is a "wasted trip" that could have been provided to another customer.

Once any period of suspension is ended, service may be reinstated by the customer calling Metro Plus.

### **Policy limits:**

**Three or more no shows in a one month period:** The driver will place a no show notice at the customer's door. If this is not possible, a no show notice will be mailed to the customer.

### **In the following month:**

**First no show:** The driver will place a no show notice at the customer's door (a "door hanger") if possible. If this is not possible, a no show notice will be mailed to the customer.

**Second no show:** Driver will again place a no-show notice on the customer's door. The customer will be contacted by certified mail that, based on their no show activity, transportation privileges will be suspended for 30 consecutive days if there is another occurrence.

**Third no show:** Metro Plus will contact the customer in writing advising them that their transportation privileges are suspended for 30 consecutive days.

**There are subsequent consequences if the pattern of no-shows occurs within each 90 days of each suspension.**

### ***Subsequent Consequences***

1. Customers who appear three or more times in one month on the no-show report, will be sent a warning letter and contacted by telephone to determine what is causing the no show activity.
2. Customers who appear three or more times each month for two consecutive months on the no-show report, will be sent a certified letter and contacted by telephone to notifying them that their transportation privileges will be suspended

for 30 days upon the next no-show.

3. Customers who, after receipt of the certified warning letter, commit another no-show, will automatically have their travel privileges suspended for 30-days effective the day after the occurrence of the no-show. Notice of suspension will be sent by certified mail and telephone contact will be attempted.

4. If, after steps 1,2 and 3 are followed, step 1 is repeated, services will be suspended for a period of 90 days. Notice of this will be included in a certified letter and through a telephone call.

5. If, after steps 1,2,3 and 4 are followed, step 1 is repeated, services will be suspended for a period of one year. Communication of this will be done by certified letter and telephone.

Once any period of suspension is ended, the customer may have service reinstated by calling the main office.

### **Customer Behavior**

Neither profanity nor abusive language/conduct is acceptable on Metro Plus vans, or when communicating with Metro Plus or Easton Coach dispatch or scheduling staff.

Weapons of any type will not be allowed on Metro Plus vans.

Radio/tape/CD players must be equipped with headphones to be used on Metro Plus vans.

Eating or drinking is not allowed on Metro Plus vans. Medical exceptions may be made to the no eating or drinking rule, with appropriate documentation from a physician.

Smoking is not permitted on Metro Plus vans.

Depending on available space, three (3) bags of groceries or other articles may be carried by a Metro Plus rider. The driver will assist with taking bags to the passenger's door; however, the vehicle operator will not go into a customer's home. The driver is also not permitted to go into a store to assist a customer with bags or groceries. The customer is responsible for transporting bags or other items through the door.

### **Illegal or disruptive conduct**

Service will be suspended or refused to customers who engage in violent, seriously disruptive or illegal conduct that affects the safety of the individual, the

driver or fellow passengers. The severity of the incident will determine whether an individual is suspended temporarily or permanently. For example, a person whose behavior threatens or has threatened the safety of paratransit personnel or other customers may be refused service (permanent revocation of eligibility). An individual who contests a refusal of paratransit service may appeal the decision through the administrative appeal process described below.

### **Non-eligibility Administrative Appeal Process**

Because ADA paratransit eligibility is established as a civil right, there is a special obligation to ensure that “due process” is observed. Therefore, every application for eligibility will be processed by Metro Plus staff who will make the initial determination. If the decision is made to deny eligibility, a letter of denial is sent to the applicant. This notice will include the reasons for denial and the procedure which may be used to appeal the decision. An applicant who wishes to appeal a decision of non-eligibility has sixty (60) days to make a written request to the LANTA Executive Director. Metro Plus will respond within thirty (30) days.

The administrative appeals process will include a hearing where the applicant can be heard and present information and arguments. The Appeals Board conducting this hearing will be made up of three (3) persons not involved in the initial decision to deny eligibility. One member will be from LANTA Metro Plus and one from the Lehigh Valley Center for Independent Living and a third person, mutually agreed upon by the first two. The third will be a person from the community who are knowledgeable about disabilities and the ADA.

The Appeals Board decision shall be issued to the individual in the appropriate accessible format and shall include reasons for the decision.

Metro Plus will not provide service to individuals who are pursuing an appeal. However, if the Appeals Board has not made a decision within thirty (30) days after the hearing, temporary service will be provided. This temporary service will continue until a decision on the appeal is reached.

### **Suspension of service appeal process**

The appeal process for suspension of service is the same as that used for eligibility determination denials. A customer who wishes to contest a decision to suspend services has sixty (60) days to file a written complaint with the ADA Coordinator. The individual making the appeal has the right to be heard in person and may be represented by an individual of their choice. The ADA Coordinator will make a complete investigation of the reason for suspension and will notify the customer of the decision to suspend in writing within ten (10) days of receiving the complaint. The written notice will include the procedures which may be utilized to appeal the decision.

Metro Plus shall provide the customer who has been notified of suspension an opportunity to be heard as well as to present written and oral information and arguments. Copies of all relevant Metro Plus documentation shall be made available to the customer. Additional witnesses shall be permitted to testify. However, a customer may waive the hearing and proceed on the basis of a written presentation. If the customer does not respond to the written notice of suspension within thirty days, Metro Plus shall make a default finding and impose sanctions.

If there is a hearing, and the customer needs Metro Plus to attend the hearing, Metro Plus will provide this service. In cases of suspension of service for other than illegal, disruptive or safety issues, Metro Plus will not suspend service while the appeal is pending - suspension of service will not begin until the appeals process is complete. If a decision is not made within ninety (90) days of the completion of the appeal hearing, the individual appealing the suspension shall be granted service until a final decision has been reached.

### **Emergency or unusual situations**

#### **Accidents:**

Fortunately, Metro Plus' safety record is excellent so you should feel very safe while riding. However, in the unlikely event that you are a customer on board a van that is involved in an accident, please remain calm and follow the van driver's instructions. Evacuate the van quickly when asked to do so. You might also be asked to provide information as a 'witness' and we do ask for your cooperation.

If you are injured, medical attention will be provided as soon as emergency medical services can be arranged for. If there are serious injuries, parties will be taken to the hospital by ambulance.

#### **Inclement Weather**

LANTA notifies **Metro** passengers about Snow Emergency Detours through the following media: WAEB AM 790, WAEB FM B104, WFMZ TV. Passengers may or check LANTA's website at [www.lantabus-pa.gov](http://www.lantabus-pa.gov) for current status.

#### **Late service or 'no show' service**

Traffic congestion, accidents, illness on board and other unexpected events can result in a van being late for a pick-up.

If you have a question about your trip on the day of the trip or while you are 'in transit,' please call 610-253-8333 Ext. 1027. This is the Easton Coach Dispatcher's office and they will assist you.

***Metro Plus*** door-to-door services are generally severely curtailed during major snow storms. Call your carrier directly for specific information about your trip.

When there is ice and snow, we ask customers to clear a path from their door to the van. It is important that this path be free of ice and snow accumulation and wide enough of an area to permit the deployment of a wheelchair lift if necessary.

**Attachment E**

**Metro Plus Customer Service Form**



Check one:  
Metro   
Metro Plus

Date Received: \_\_\_\_\_  
Received By: \_\_\_\_\_

**CUSTOMER SERVICE FORM**

Complaint \_\_\_\_\_  
Commendation \_\_\_\_\_  
Suggestion \_\_\_\_\_

Customer's Name \_\_\_\_\_

Address \_\_\_\_\_

Phone \_\_\_\_\_

\_\_\_\_\_

Zip \_\_\_\_\_

DATE OF INCIDENT: \_\_\_\_\_ TIME: \_\_\_\_\_ A.M. \_\_\_\_\_ INBOUND \_\_\_\_\_  
P.M. \_\_\_\_\_ OUTBOUND \_\_\_\_\_ BUS # \_\_\_\_\_

ROUTE #: \_\_\_\_\_ Employee's Name (if known) \_\_\_\_\_

LOCATION: \_\_\_\_\_

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> OPERATIONS _____         | <input type="checkbox"/> Bus did not show                | <input type="checkbox"/> INFORMATION SERVICES _____ |
| <input type="checkbox"/> Driver attitude/conduct  | <input type="checkbox"/> Off Route                       | <input type="checkbox"/> MARKETING _____            |
| <input type="checkbox"/> Careless driving/comfort | <input type="checkbox"/> Fare/Trans. Dispute             | <input type="checkbox"/> ADMINISTRATION _____       |
| <input type="checkbox"/> Early                    | <input type="checkbox"/> Wrong Signage                   | <input type="checkbox"/> PLANNING _____             |
| <input type="checkbox"/> Late                     | <input type="checkbox"/> Motor run/lights on at terminal | <input type="checkbox"/> Route Protest              |
| <input type="checkbox"/> Passed By                | <input type="checkbox"/> Disturbance                     | <input type="checkbox"/> Stop signs/Shelters        |
| <input type="checkbox"/> Missed Transfer          | <input type="checkbox"/> Accident                        | <input type="checkbox"/> Service Request            |
| <input type="checkbox"/> Overload                 | <input type="checkbox"/> Other                           | <input type="checkbox"/> MAINTENANCE _____          |

CUSTOMER'S REMARKS: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**1. FORWARD TO ADMINISTRATION**

2. Route to: OPS \_\_\_\_\_ Information Services \_\_\_\_\_ Marketing \_\_\_\_\_ Planning \_\_\_\_\_ Maintenance \_\_\_\_\_

(SUPERVISOR USE ONLY) Action Taken and Comments. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

3. ADMINISTRATION Action Taken: Date \_\_\_\_\_ Correspondence \_\_\_\_\_ Other \_\_\_\_\_

4. SUGGESTION FILE Route # \_\_\_\_\_ Computer Entry \_\_\_\_\_

Distribution: White copy—Executive Director; Yellow copy—Development Dept.; Pink copy—Dept. of Referral

**Attachment F**

**Metro Plus Application & Eligibility Card**

## Metro Plus Paratransit Eligibility Application

All three parts must be completed in their entirety and submitted together or the application will be returned to the applicant. This will result in a delay in determining eligibility for the Metro Plus service.

If you have any questions, need assistance in completing the application, or require this information in another form (audio tape, Spanish, Braille, etc.) please call Metro Plus at 610-432-3200

<b>Part 1</b>	Information about you. Please print or type the following information:		
<b>First Name:</b>	<b>Last Name:</b>	<b>Middle Initial:</b>	
<b>Address:</b>			
<b>City:</b>	<b>State:</b>	<b>Postal Code:</b>	
<b>Social Security Number:</b>	<b>Date of Birth:</b>	<b>County: (check one)</b>	
		<input type="checkbox"/> Lehigh <input type="checkbox"/> Northampton	
<b>Home Telephone Number:</b>	<b>Work Telephone Number:</b>	<b>Closest Intersecting Streets:</b>	
<b>If the address provided is a P.O. Box or Rural Route, please give actual street name:</b>			
<b>In case of emergency who should we contact?</b>		<b>Name:</b>	
<b>Relationship to you:</b>		<b>Phone:</b>	
<p><i>Please answer the following questions:</i></p> <p>How many blocks are you from a LANTA/Metro bus stop? _____</p> <p>Metro Plus provides service for those who are prevented from using regular Metro city buses due to a physical or mental disability. Please describe your disability:</p> <hr style="border: 1px solid black;"/> <hr style="border: 1px solid black;"/> <hr style="border: 1px solid black;"/>			
<p>Do you have an ACCESS Card or a Managed Care Card from the Department of Public Welfare?    <input type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p><i>If yes, please provide a <b>copy</b> of this card with your application.</i></p>			
<i>Please continue to next page.</i>		Page 1 of 5	

**The following information will be used to ensure that an appropriate vehicle is used to provide your transportation, and that an accurate analysis of your trip requests can be made:**

Do you use any of the following aids to mobility? (check all that apply)

- |  |  |
|--|--|
| <input type="checkbox"/> Manual Wheelchair | <input type="checkbox"/> Electric Wheelchair     |
| <input type="checkbox"/> Power Scooter     | <input type="checkbox"/> Ortho Cane              |
| <input type="checkbox"/> White Cane        | <input type="checkbox"/> Crutches                |
| <input type="checkbox"/> Leg Braces        | <input type="checkbox"/> Cane                    |
| <input type="checkbox"/> Walker            | <input type="checkbox"/> Personal Care Attendant |
| <input type="checkbox"/> Guide Dog         |  |

Are any of the following surrounding the entrance to your home?

- |  |  |
|--|--|
| <input type="checkbox"/> Steps (how many? _____) | <input type="checkbox"/> Ramp (how long? _____)  |
| <input type="checkbox"/> Steep Hill              | <input type="checkbox"/> Broken Sidewalk/Walkway |
| <input type="checkbox"/> Narrow Street           | <input type="checkbox"/> Other: _____            |

Should we pick you up at the \_\_\_\_\_ front \_\_\_\_\_ side or \_\_\_\_\_ rear entrance?

What street should we park on to pick you up?

**I hereby certify that the information given above is correct:**

--	--	--	--

**Applicant's Signature**

**Date**

If this application is being completed by someone other than the person requesting Metro Plus services, that person must complete the following:

<b>First Name:</b>	<b>Last Name:</b>	<b>Middle Initial:</b>

**Address:**

--

**City:**

**State:**

**Postal Code:**

--	--	--

**Daytime Phone:**

**Relationship to Applicant:**

--	--

**I hereby certify that the information given above is correct:**

--	--	--	--

**Signature**

**Date**

*Please continue to next page.*

<b>Part 2</b>	<b>Proof of Age</b>
When you submit this application, please include a <b>photocopy</b> of <b>one</b> of the following documents to verify your age.	
<b>These are the only documents that can be accepted as proof of age.</b>	
<ol style="list-style-type: none"> <li>1. Birth Certificate</li> <li>2. Baptismal Record</li> <li>3. Passport or Naturalization Papers</li> <li>4. PACE Card</li> <li>5. Military Discharge Papers</li> <li>6. Letter from Social Security Office (must show date of birth)</li> <li>7. Drivers license (need not be current)</li> <li>8. State issued I.D. Card</li> </ol>	
Please do <b>not</b> send original documents; we cannot guarantee they will be returned to you.	

<b>Part 3</b>	<b>To be completed by physician.</b>		
The following physician is familiar with my disability and is authorized to provide information to complete this certification.			
<b>Name of Physician:</b>			
<b>Address:</b>			
<b>City:</b>	<b>State:</b>	<b>Postal Code:</b>	
<b>Phone Number:</b>	<b>Applicant's Signature:</b>	<b>Date:</b>	
Federal law requires that those whose physical or mental impairment <u>prevents them</u> from using available fixed route Metro bus services, be provided with an alternative, door-to-door, transportation service. Distance and "inconvenience" are not the basis of eligibility but, rather, the person's functional inability to use regular transit services. The information you provide will allow us to make an appropriate evaluation of this request and its application to specific trip requests. Thank you for your cooperation in this matter.			
<b>Capacity in which you know applicant:</b>			
<i>Please continue to next page.</i>		Page 3 of 5	

Metro Plus provides service to those who are prevented from using regular, Metro city buses due to a physical or mental disability. What is the condition/diagnosis that prevents the applicant from using the regular LANTA/Metro city bus system?

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Is this condition temporary?  Yes  No

If yes, expected duration until \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

If the applicant has a disability affecting mobility, please complete this section. If this does not apply please move on to the next section:

Is the applicant able to walk 200 feet without assistance?  Yes  No

If sometimes; explain: \_\_\_\_\_

Is this applicant able to walk ¼ mile (2 city blocks) without assistance?  Yes  No

If sometimes; explain: \_\_\_\_\_

Is this applicant able to walk ¾ mile (6 city blocks) without assistance?  Yes  No

If sometimes; explain: \_\_\_\_\_

Is this applicant able to wait outside without support for 10 minutes?  Yes  No

If sometimes; explain: \_\_\_\_\_

Does the applicant **require** an escort?  Yes  No

*Escorts are to be provided by the applicant.*

If the applicant has a visual impairment, please complete this section. If this does not apply please move on to the next section.

Visual Acuity with best correction: \_\_\_\_\_ Right eye \_\_\_\_\_ Left eye \_\_\_\_\_ Both eyes

Visual Fields: \_\_\_\_\_ Right eye \_\_\_\_\_ Left eye \_\_\_\_\_ Both eyes

If the applicant has a cognitive disability, please complete this section. If this does not apply please move on to the next section.

**Is the applicant able to:**

Give addresses and telephone numbers upon request?  Yes  No

Recognize a destination or landmark?  Yes  No

Manage unexpected situations or unexpected change in routine?  Yes  No

Ask for, understand and follow directions?  Yes  No

Safely and effectively travel through crowded/complex facilities?  Yes  No

Is (are) there any other effect(s) of the disability of which Metro Plus drivers should be aware of in order to properly provide transportation services? Please describe:

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<b>Caseworker Use Only!</b>	<input type="checkbox"/>	65+ Sponsored	<input type="checkbox"/>	60-64 Sponsored
	<input type="checkbox"/>	65+ Self Pay	<input type="checkbox"/>	Under 65 Self Pay

**Name of Person Completing Part 3 of this application:**

---

Physician Signature	Date		
	Month	Day	Year

**Telephone Number**

Completed applications can be submitted in the following formats:

By Mail: LANTA/Metro Plus  
1060 Lehigh Street  
Allentown, PA 18103

Online: <http://www.lantabus-pa.gov>

**Metro Plus**

Certificate of Eligibility for ADA  
or other Paratransit Service

Name:

ADA:

ID#

Date Issued:

Expiration Date:

Signature:

Eligibility Conditions:

Travel with PCA

Yes  No

DOB:

The person identified on this card has been determined "ADA Paratransit Eligible" in accordance with the provisions of 49 CFR Part 37 and may be entitled to receive complementary paratransit service OR has been determined for MATS service OR Senior Shared Ride Reduced Fare Service. Services are subject to all applicable program regulations. This card is non-transferrable.

Authorized by:

Issuing Public Entity: **IAATA / Metro Plus**

City: ALLENTOWN

State: PENNSYLVANIA

Phone: 610-432-3200



## **Attachment G**

### **Metro Plus Eligibility Sample Letters & Appeal Process**

**Metro Plus or Carbon County Community Transit  
Appeals Process**

If you wish to appeal a decision about ineligibility you must do so within 60 days of the postmark on the notification of ineligibility. **The appeal must be in writing from your physician, must be on the physician's stationery and must be signed by the physician.**

The letter of appeal from your physician should be sent to:

**Executive Director  
LANTA  
1060 Lehigh Street  
Allentown, PA 18103-3898**

The Executive Director will review the case, make a determination and notify you of his determination within 30 days of the receipt of the letter of appeal. If this determination is not to your satisfaction, you may appeal to the ADA Eligibility Appeals Board within 60 days of the postmark on the Executive Director's notification.

The letter of appeal from your physician should be sent to:

**ADA Eligibility Appeals Board  
1060 Lehigh Street  
Allentown, PA 18103-3898**

The Appeals Board is a panel of three people: one from LANTA; one from the Lehigh Valley Center for Independent Living (LVCIL); and a third party, mutually agreed upon by the other two, who brings experience or knowledge as to the mobility ramifications of the matter.

The Appeals Board will review the letter of appeal, meet with the individual and render its decision within 30 days of the receipt of the letter of appeal.

No service will be provided during the period of appeal. Should this period extend beyond 90 days, however, eligibility will be presumed and services will be rendered until a decision is made.

All individuals may be represented in the appeals process by an individual of their choosing.

**Confidentiality**

Medical information gathered through the application and appeals process shall not be shared by anyone other than those designated to make eligibility determinations. Transit providers may, however, share information regarding the functional ability of an individual to utilize transportation services with another transit provider.

## ADA Eligibility Explained

The Americans with Disabilities Act of 1990 is a law that made it the "civil right" of people with disabilities to have the same access to public transportation that everyone else has. Modifications are being made to city transit buses so that people with special needs can be accommodated. These include:

- . Low-floor buses without steps at the entrance,
- . Ramps which, when deployed, allow people who use wheelchairs to board,
- . Verbal and visual on board bus stop announcements to help the hearing and visually impaired in riding the bus.

For those who are *prevented* due to their disability in accessing a regular Metro city transit bus even with these special accommodations, LANTA provides Metro Plus, door-to-door services using smaller vans and mini-buses. Because of the limited capacity and high cost of the Metro Plus services, they are reserved for only those who are unable to ride Metro.

People who are determined to be "ADA Eligible" - those whose civil rights to use transit are protected by law - are assigned a transportation mode, either Metro or Metro Plus, based upon the functional mobility they describe through the eligibility application process. Currently, LANTA makes this determination based upon a self-certification and professional verification: the person describes their mobility limitations and a doctor or other health care profession signs to verify this. LANTA does have an in-person evaluation tool for people with cognitive disabilities.

Because some people's disability limits them in some circumstances and not others, LANTA may assign "conditional" ADA eligibility which means that for some trips, the person is to use regular Metro services and for others, the person has access to Metro Plus door-to-door services. An example of this would be a person who is visually impaired and routinely ride Metro to and from work but, when going to a new doctor - a trip that is unfamiliar to them - may opt to use Metro Plus.

ADA Eligibility does not mean that a person has a right to more transportation than is available to everyone. If a destination is not served by public transportation or the person resides outside the public transit service area, then service is not available just as it not available to anyone trying to access that destination by bus or who is not served by a bus route. Therefore, a person can go through the application process, be determined to be ADA Eligible, and not have access to service either because of where they wish to travel or where they live. The ADA service area is defined as 3/4 mile on either side of an existing Metro bus route. In the Lehigh Valley this includes the urbanized areas and many boroughs, but does not include the more rural sections of Lehigh and Northampton Counties where bus service does not operate.

November 24, 2008

ADA eligible

Mr. ~~Kevin M. Milligan~~  
~~SSA Milligan~~  
Breinigsville, PA 18031

Dear Mr. ~~Milligan~~:

Your application for the Metro Plus Paratransit Service has been received and processed. Through the application process, you have been determined to be "ADA Eligible" for public transportation services in accord with the Americans with Disabilities Act (ADA) of 1990. However, subsidized ADA van service is not being extended to you because you reside outside of the Metro Plus ADA service area, which is defined as within  $\frac{3}{4}$  of a mile of a LANTA Metro fixed bus route.

Metro Plus is obligated to provide transportation to ADA eligible individuals who reside within  $\frac{3}{4}$  of a mile of a LANTA Metro fixed bus route. Our research shows that you reside **.89 miles** from the nearest LANTA Metro fixed bus route, which would be the **Shuttle #2 Route**. Since you do not reside within the  $\frac{3}{4}$  of a mile service area the following options are available you.

1. Non-ADA van service to and from your home is available at the full fare of \$22.15 per one-way trip. If you want to do this please send me a letter stating that to the address in the lower left corner.
2. If you can be transported to a point currently served by a LANTA Metro fixed bus route the subsidized ADA van service could be provided to you at the subsidized fare of \$3.35.
3. You may attempt to qualify for a new State program by completing and returning the enclosed application to Metro Plus. If you qualify for the program a one way trip would cost you \$3.35.

PwD

The enclosed ADA eligibility information should help you to understand the eligibility process. If you have any questions I may be reached at 610-432-3200.

Respectfully yours,

Kelly Ann Sokol  
Operations Supervisor

Enclosures

Not eligible  
Not specific  
No info about appeal

January 19, 2009

Mrs. ~~Robert Coleman~~  
~~2612~~  
Fogelsville, PA 18051

Dear ~~Mrs. Coleman~~:

Not specific

? —

Your application for the Metro Plus Paratransit Service has been received and processed. Through the application process, it has been determined that you are not ADA eligible for public transportation services in accord with the Americans with Disabilities Act (ADA) of 1990. This determination was based on the information supplied by your doctor on the application. Even if you were determined to be ADA eligible the subsidized door-to-door van service still could not be extended to you because you reside outside of the Metro Plus ADA service area, which is defined as within  $\frac{3}{4}$  of a mile of a LANTA Metro fixed bus route.

Metro Plus is obligated to provide transportation to ADA eligible individuals who reside within  $\frac{3}{4}$  of a mile of a LANTA Metro fixed bus route. Our research shows that you reside **2.41 miles** from the nearest LANTA Metro fixed bus route, which would be the **Shuttle #2 Route**.

Since you are not ADA eligible and do not reside within the  $\frac{3}{4}$  of a mile service area we can only provide door-to-door van service to you under the following scenario. Door-to-door van service to and from your home is available at the general public fare of \$22.15 per one-way trip.

The enclosed ADA eligibility information should help you to understand the eligibility process. If you have any questions please contact me at 610-432-3200.

Respectfully yours,

Kelly Ann Sokol  
Operations Supervisor

Enclosures

Not eligible  
Appeal info attached

February 2, 2009

Ms. ~~XXXXXXXXXXXX~~  
~~XXXXXXXXXXXX~~  
Allentown, PA 18102

Dear Ms. ~~XXXXXXXX~~:

Your application for the Metro Plus Paratransit Service has been received and processed. Metro Plus has determined that you are not eligible for the Metro Plus door-to-door van service.

According to your application and the information supplied by your doctor you do not have a physical or a cognitive disability that would prevent you from using the LANTA Metro fixed route bus system. According to our research you reside less than 150 feet from a LANTA Metro fixed bus route, which would be the D Route, and according to your doctor you are able to walk that distance. Because the Metro Plus door-to-door van service is in such high demand eligibility must be limited to those individuals who cannot physically use the LANTA Metro fixed route bus system.

Federal law restricts eligibility for the ADA Paratransit Service to persons who cannot, due to a physical or a cognitive disability, utilize fixed route transit services. This determination applies only to your eligibility for the ADA Paratransit Service offered by Metro Plus.

The enclosed ADA eligibility information should help you to understand the eligibility process. If you wish to appeal this decision please follow the enclosed appeals process.

Respectfully yours,

Kelly Ann Sokol  
Operations Supervisor

Enclosures

March 9, 2009

Not eligible for ADA  
Not specific  
Possible MATP  
Appeal process noted

Ms. ~~██████████~~  
~~922 Englewood Lane~~  
Coopersburg, PA 18036

Dear Ms. ~~██████~~:

Your application for the Metro Plus door-to-door van service has been received and processed. Your application was used to determine your eligibility under 2 programs: the Americans with Disabilities Act of 1990 (ADA) and the Medical Assistance Transportation Program (MATP).

not specific —

It has been determined that you are not ADA eligible for public transportation services in accord with the ADA. This determination was based on the information supplied by your doctor on the application. Even if you were determined to be ADA eligible the subsidized door-to-door van service still could not be extended to you because you reside outside of the Metro Plus ADA service area, which is defined as within  $\frac{3}{4}$  of a mile of a LANTA Metro fixed bus route.

Metro Plus is obligated to provide transportation to ADA eligible individuals who reside within  $\frac{3}{4}$  of a mile of a LANTA Metro fixed bus route. Our research shows that you reside **3.32 miles** from the nearest LANTA Metro fixed bus route, which would be the **Shuttle #4 Route**.

The MATP requests that those persons living further than  $\frac{1}{4}$  of a mile from a bus stop be eligible for medical trips with the door-to-door van service. Therefore, you may use the door-to-door van service for approved MATP medical services at approved MATP medical facilities.

The enclosed ADA eligibility information should help you to understand the eligibility process. If you wish to appeal the ADA decision follow the enclosed appeals process.

Respectfully yours,

Kelly Ann Sokol  
Operations Supervisor

Enclosures

## **Attachment H**

### **Assumptions and Methodology for Estimating Percent of Long Telephone Wait Times**



Without a frequency distribution of wait times, it is not possible to apply LANTA's service standard, but some inferences are possible. When the average wait in a given period is longer than 2 minutes, then roughly half the calls in that period exceed the standard.

If it is assumed that the other periods with the longest wait over 2 minutes had one such call, the percentage of calls for the week with a wait longer than 2 minutes would be 4 percent for the week of February 2, 6 percent for the week of March 2, and 7 percent for the week of March 30.

For example, using data for the week of March 30, 2009:

	<b>Mar 30 - Apr 3</b>
<b>Total calls</b>	<b><u>1,883</u></b>
<b>Longest Wait &gt; 2 minutes</b>	
Periods with longest wait > 2 minutes	<b><u>65</u></b>
Percent of periods (170 each week)	38%
Calls in periods with long waits	985
Percent of day weighted by number of calls	52%
<b>Longest Wait &gt; 3 Minutes</b>	
Periods with longest wait > 3 minutes	33
Percent of periods	19%
Calls in periods with long waits	482
Percent of day weighted by number of calls	26%
<b>Average Wait &gt; 2 Minutes</b>	
Periods with average wait > 2 minutes	<b><u>11</u></b>
Percent of periods	6%
Calls in periods with long waits	<b><u>163</u></b>
Percent of day weighted by number of calls	9%
<b>Percent of Calls Not Answered</b>	1.1%

Calls in the 11 periods averaging > 2-minute wait: 163 / 2	81
Number of other periods with longest wait > 2-minute wait (65-11=54)	
Number of calls in these periods if only one caller waited > 2 minutes	54
Total calls with wait > 2 minutes, based on assumption (81+54)	135
Percent of total calls with wait > 2 minutes for the week (135/1,883)	7%

Using the same calculation, if there were three long waits per period when the average was less than 2 minutes, the percent of callers with long waits would be 10 percent, 11 percent, and 13 percent, respectively, for the three weeks studied.

## **Attachment I**

**Analysis of Driver Call-offs: March 29 to April 4, 2009**

### Driver Call-offs by Garage

Date	Easton Garage		Whitehall Garage		Total Pullouts	Total Call-offs
	Pullouts	Call-offs	Pullouts	Call-offs		
3/29/09	3	0	0	0	3	0
3/30/09	62	0	42	0	104	0
3/31/09	62	2	44	1	106	3
4/1/09	61	1	48	0	109	1
4/2/09	62	1	45	0	107	1
4/3/09	59	0	48	0	107	0
4/4/09	33	0	12	0	45	0
Total	342	4	239	1	581	5

**Attachment J**  
**Driver Interview Form**

**Lehigh and Northampton Transportation Authority (LANTA)  
Paratransit Driver Interviews**

1. How long have you worked here? \_\_\_\_\_
  
2. Did you drive for another carrier in the past? \_\_\_\_\_yes \_\_\_\_\_no
  - a. For how long? \_\_\_\_\_
  
3. Tell me about the training you got when you started your job: What was included? How long did it last?
  
  
  
  
  
  
  
  
  
  
4. How well did the training prepare you for your job?
  
  
  
  
  
  
  
  
  
  
5. Was anything missing from your training that should be added?
  
  
  
  
  
  
  
  
  
  
6. Do you get refresher training? How often and what is included?
  
  
  
  
  
  
  
  
  
  
7. What passenger assistance are you required to provide? Are you allowed to do more if you want to?
  
  
  
  
  
  
  
  
  
  
8. What is the hardest part of your job?

9. What is the easiest part of your job?

10. Are your schedules good? Too tight? Too easy?

11. What happens if something is wrong or if it would be better to run the manifest in a different order? Can you change it?

12. What is the on-time pick-up window? Are passengers usually ready to go when you arrive? How long do you have to wait for them?

13. If you arrive before the on-time pick-up window, what do you do?

14. What happens if you are running late?

15. Are the vehicles clean and in good repair?

16. Is there anything you would like to add that I didn't ask about?

\_\_\_\_ Date  
\_\_\_\_ Initials

**Attachment K**

**May 28, 2009 Letter from Easton Coach Company**

# EASTON COACH COMPANY

May 28, 2009

Mr. Denis Meyers  
Assistant Executive Director  
Lehigh and Northampton Transportation Authority  
1060 Lehigh Street  
Allentown, PA 18103

## *On-time Performance (FTA Review)*

Dear Denis,

When the FTA review team looked at on-time performance, they reviewed a report that we provided of all ADA trips within a defined time period. The raw trip data shows pick up and drop off data for each trip – both actual and scheduled. As I indicated to you when the FTA team completed its field work on April 30<sup>th</sup>, any assessment of on-time performance based on raw trip data provides a less-than-accurate measurement of the true results. It's for that reason that we instituted the monthly trip sampling technique for evaluating/calculating on-time performance (i.e., within the prescribed 30 minute "on-time" window of 15 minutes before and 15 minutes after the agreed upon pick-up time). You'll recall that our methodology follows the process developed in consultation with LANTA's independent auditors, Reinsel & Company.

The mechanics of the automated process in which we log trips will make certain trips appear late based on the raw data that were actually on-time. Pick-up and drop-off times are registered when a driver presses the related button on his mobile data terminal (MDT). We emphasize to our drivers that they should not register a pick-up or drop off until either a passenger is on-board and secured or off-boarded at a destination. You'll recall that trips change in color to red in Transview when a passenger is on-board. That serves an important dispatching/call center function as it allows our people to provide more specific information about the status of our passengers when it is requested (by families or agencies who inquire). For example, we do not want to indicate that a passenger is on-board if he is in line at a senior center awaiting the loading of his specific bus even though the bus has been sitting in line at the pick-up location for some time.

I've attached the summary of our on-time reporting for the twelve month period ended April 30, 2009. The testing sample is randomly selected from all of the completed trips in each month (without distinction by customer types and purposes of trips). The sample size – 368 to 516 per month in the last twelve months or 5,239 in total – is large enough to provide a 95% confidence factor in the results (similar to the parameters employed by Reinsel & Company back in 2007).

In general, of the 5,239 trips that we sampled in the last year, 4,184 or 79.9% were on-time based on the raw data. The other 20.1% (1,055 trips) were analyzed in more detail. That analysis involves a full review of each trip including an examination of the vehicle's completed manifest in the period before and after the trip under review and, at times, an



inspection of the GPS history to track a vehicle's physical location at the times under review. This manner of analysis allows us to determine true on-time performance for the sampled trips that the raw data does not.

There are four major things that we look at for those 20% of the trips that require further review.

1. ***On-time for Program*** – Because of the variables involved in delivering groups of passengers to various programs and medical treatment centers (e.g., senior centers, dialysis, mental health locations) either dispatch or the drivers themselves may make same-day adjustments to schedules (e.g., to accommodate certain customers who may want to be picked up earlier or later than usual) that are not generally reflected on the schedules or in the system. For those trips that may appear to be picked up early or late based on the raw data, we assess them for whether the passengers arrived on-time for their programs' start times.

*Example* – If a driver agrees to pick a passenger a half hour later at 8:15A than her regular standing order of 7:45A - for whatever reason - to take her to a senior center, we would consider that trip on-time if she arrived at the center before the program's official start time of 9:00A.

Trips of this kind constituted 19.1% of the 1,055 sample trips that required further analysis during the last twelve months.

2. ***Center "Line-up" Situations*** – We have several agencies and centers to which we assign numerous buses to accommodate the particular volume of Metro Plus customers that travel there. Those include:
  - a. Westminster Senior Center – 5 buses for dismissal at 3P
  - b. Via – 8 at 3P
  - c. The ARC – 7 at 3P
  - d. Haven House – 5 at 2P
  - e. APS – 5 at 3P
  - f. Good Shepherd – 13 at various times (4 for the workshop at 3)
  - g. Dialysis Centers (4 each at AKD, Whitehall, BKD and St. Luke's and 2 or 3 at Palmer, Easton, Slate Belt, AKD – Emmaus)

As you know, loading areas at most centers are limited and generally allow only one or two vehicles to safely load passengers at a time. Also, we are often picking up passengers along with family members and vehicles from assisted living facilities and nursing homes. We train our drivers not to record a pick-up until a passenger is physically on the bus even though they may have been waiting in line at the center well in advance of the scheduled pick-up time so that a "pick-up" in Transview is the same as "on-board".

*Example* – A vehicle is sixth in line of eight buses at Via and enters pick-up times of 3:35P for his passengers there. All of those passengers have standing orders for 3:00P pick-ups. If the GPS or other evidence demonstrates that the driver was at the pick-up location within the window (at 3:00P) then we classify the trip as on-time.

Trips of this kind constituted 13.5% of the 1,055 sample trips that required further analysis during the last twelve months.

3. ***Passengers late for Dialysis or Medical Appointment*** – If via GPS or Transview reports we can determine that a driver was at a location for either a medical/dialysis or any other appointment within the prescribed window for the scheduled pick-up and had to return later because the passenger was not ready, we classify those trips as on-time.

*Example* – A driver picks up three of the four scheduled passengers from a dialysis clinic at 4:00P (the scheduled time) and either he or another driver returns an hour later for the fourth passenger, we'd deem that trip to be on-time.

Trips of this kind constituted 16.4% of the 1,055 sample trips that required further analysis during the last twelve months.

4. ***MDT issues*** – If we can determine that there was an MDT malfunction that resulted in a trip's pick-up or drop-off time being inaccurate, we either reclassified the trip as on-time (if we could otherwise determine that it was on-time) or rejected it from the sample.

*Example* – A driver neglects to record the pick-up of a passenger at 3:00P (the scheduled time) and realizes his mistake when he drops the passenger off at home at 3:40P at which time he records both ends of the trip as occurring at 3:40P. If we can reasonably determine that the pick-up occurred inside the allowable window, we would classify that trip as on-time.

Trips of this kind constituted 5.4% of the 1,055 sample trips that required further analysis during the last twelve months.

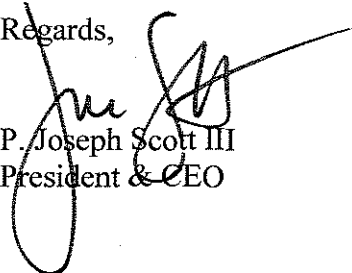
Another 2.4% of the 1,055 sample trips in the last year were classified as on-time based on further research for reasons other than the four detailed above. Therefore, 598 or 56.7% of the 1,055 trips that were analyzed beyond the raw data were classified as on-time.

The remaining 457 or 43.3% of the 1,055 sample trips that required follow up were actually late (8.7% of the total sample). Of those: (1) 378 (81.8% of the sample trips that were late – 7.1% of the total sample) were within 15 minutes of the prescribed window; (2) 75 or 16.4% of the late trips were between 15 and 60 minutes late, and; (3) 8 trips or

1.8% of the late trips (0.2% of total trips) were over one hour late (“extremely” late in our internal vernacular).

Once you have had a chance to review the attachment and this letter, we can discuss this at greater length. The summary statistics for our sampling over the past year shows that 91.3% of the sampled trips were on time and 8.7% were late. 98.4% of the trips were either on-time or within 15 minutes of being so.

Regards,



P. Joseph Scott III  
President & CEO

Cc: David W. Batchelor  
Leonard Koury

LANTA Metro Plus  
 On-Time Statistics  
 Twelve Months Ended April 2009

	Raw On-time	Reviewed further										Subtotal	
		Not Late						N			L		X
		1	2	3	4	5	Early	15-30 late	16-60 late	>60 late			
May-08	319	18	3	14	2	9	0	22	6	0	74		
Jun-08	307	21	4	11	3	0	0	24	9	4	76		
Jul-08	320	13	11	12	2	1	0	37	12	1	89		
Aug-08	332	15	2	7	4	0	0	30	8	0	66		
Sep-08	367	9	4	9	1	1	0	43	10	1	78		
Oct-08	365	17	7	9	5	0	0	53	7	0	98		
Nov-08	300	2	7	11	4	1	0	41	1	1	68		
Dec-08	356	9	28	22	10	5	0	21	1	0	96		
Jan-09	383	28	26	25	10	1	0	24	3	0	117		
Feb-09	411	28	18	15	10	3	0	25	6	0	105		
Mar-09	398	32	18	15	2	2	0	24	6	1	100		
Apr-09	326	9	14	23	4	2	0	30	6	0	88		
LTM 04-09	4,184	201	142	173	57	25	-	374	75	8	1,055		
	79.9%	3.8%	2.7%	3.3%	1.1%	0.5%	0.0%	7.1%	1.4%	0.2%	20.1%		
		19.1%	13.5%	16.4%	5.4%	2.4%	0.0%	35.5%	7.1%	0.8%	100.0%		

# Sample Trips	On-time & early	Total			
		Late			Total
		15-30	16-60	> 60	
393	365	22	6	0	28
383	346	24	9	4	37
409	359	37	12	1	50
398	360	30	8	0	38
445	391	43	10	1	54
463	403	53	7	0	60
368	325	41	1	1	43
452	430	21	1	0	22
500	473	24	3	0	27
516	485	25	6	0	31
498	467	24	6	1	31
414	378	30	6	0	36
5,239	4,782	374	75	8	457
100.0%	91.3%	7.1%	1.4%	0.2%	8.7%
		35.5%	7.1%	0.8%	43.3%
		81.8%	16.4%	1.8%	100.0%

On-time & early	Percentage				Pct. OT, early & <15 late
	Late			All Late	
	15-30	16-60	> 60		
92.9%	5.6%	1.5%	0.0%	7.1%	98.5%
90.3%	6.3%	2.3%	1.0%	9.7%	96.6%
87.8%	9.0%	2.9%	0.2%	12.2%	96.8%
90.5%	7.5%	2.0%	0.0%	9.5%	98.0%
87.9%	9.7%	2.2%	0.2%	12.1%	97.5%
87.0%	11.4%	1.5%	0.0%	13.0%	98.5%
88.3%	11.1%	0.3%	0.3%	11.7%	99.5%
95.1%	4.6%	0.2%	0.0%	4.9%	99.8%
94.6%	4.8%	0.6%	0.0%	5.4%	99.4%
94.0%	4.8%	1.2%	0.0%	6.0%	98.8%
93.8%	4.8%	1.2%	0.2%	6.2%	98.6%
91.3%	7.2%	1.4%	0.0%	8.7%	98.6%
91.3%	7.1%	1.4%	0.2%	8.7%	98.4%