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F E D E R A L T R A N S I T A D M I N I S T R A T I O N

Lowell Regional Transit Authority ADA Paratransit Compliance Review

Final Report
June 2016



U.S. Department of Transportation
Federal Transit Administration

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Executive Summary

Objective and Methodology

Lowell Regional Transit Authority Road Runner Paratransit Program includes the following positive program elements

Positive Program Elements

- LRTA Road Runner drivers exhibit a positive, professional attitude toward their passengers.
- LRTA Road Runner reservationists are skillful and effective in negotiating the trip times necessary to accommodate their passengers' travel needs.
- LRTA Road Runner coordinates service with Councils on Aging, throughout its region, by providing maintenance for the Councils' buses and additional capacity, through its Dial-a-Ride Service for older adults.

Lowell Regional Transit Authority Road Runner has the following administrative deficiencies that are easily correctable to bring their program into compliance with 49 CFR Parts 27, 37 and 38.

Administrative Deficiencies

- None

Lowell Regional Transit Authority Road Runner has the following substantive deficiencies that need to be addressed to bring their program into compliance with 49 CFR Parts 27 and 37 and 38.

Substantive Deficiencies

- LRTA Road Runner has not established written operational policies, procedures, and service standards to identify, document, manage, and report on capacity denials, missed trips, late pickups, drop-offs, or overly long trips.
- LRTA Road Runner staffing levels, scheduling software, vehicle availability, and absence of written policies and performance standards appeared to limit service provision, at the time of the review.
- Capacity constraints exist as a result of LRTA Road Runner's lack of a conditional eligibility process; an inoperable no-show policy; lack of management data metrics for on-time performance, missed trips, and trip denials; and excessive rates of late pickups and trip cancellations.

1. General Information

This chapter provides basic information concerning this compliance review of Lowell Regional Transit Authority (LRTA). Information on Lowell Regional Transit Authority (LRTA), the review team, and the dates of the review are presented below.

Grant Recipient:	Lowell Regional Transit Authority (LRTA)
City/State:	Lowell, Massachusetts
Grantee Number:	1375
Executive Official:	James H. Scanlan, Administrator
On-site Liaison:	David Bradley, Deputy Administrator
Report Prepared By:	Meeting the Challenge, Inc.
Dates of On-site Visit:	October 19, 2015 – October 22, 2015
Review Team Members:	Geoff Ames, Philip Williams, Crystal Lyons, Greg Dreyer, Ken Heldt

2. Jurisdiction and Authorities

Public entities that operate fixed route transportation services for the general public are required by the U.S. Department of Transportation (DOT) regulations implementing the Americans with Disabilities Act of 1990 (ADA) 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, 38, and 39) include eligibility requirements and service criteria that must be met by ADA complementary paratransit service programs. Section 37.135(d) of the regulations required that ADA complementary paratransit service met 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.

3. Purpose and Objectives

This chapter discusses the purpose and objectives of an FTA ADA complementary paratransit compliance review and the review process.

3.1 Purpose

Pursuant to 49 CFR §§27.19 and 27.123, as part of its oversight efforts, the FTA, through its Office of Civil Rights, conducts periodic reviews of fixed route transit and ADA complementary paratransit services operated by its grantees. Compliance with all applicable requirements of the Americans with Disabilities Act (ADA) of 1990 (42 USC 12101-12213) including the DOT's ADA Regulations is a condition of eligibility for receiving Federal financial assistance.

3.2 Objectives

The primary objective of this paratransit review is to verify whether a public operator of a fixed-route transit system that benefits from FTA funding is meeting its obligations under the ADA to provide paratransit as a complement to its fixed-route service. This review examines the policies, procedures and operations of the transit system's ADA complementary paratransit system concerning service provision, including origin to destination service; eligibility, including the process used to determine who is eligible for the service; receiving and resolving complaints; and meeting the ADA complementary paratransit service criteria as specified in 49 CFR §37.131.

The review team will observe dispatch, reservations and scheduling operations and analyze service statistics, basic service records and operating documents. To verify the accuracy of the public operator's reported information and evaluate its methodology, the review team will also conduct its own independent analysis of sample data. In addition, FTA will solicit comments from eligible riders and from local disability organizations.

This report will summarize findings and advisory comments. Findings of deficiency require corrective action and/or additional reporting. Advisory comments are statements detailing recommended or suggested changes to policy or practice to ensure effective practices under the ADA.

4. Introduction to Lowell Regional Transit Authority

Lowell Regional Transit Authority (LRTA) of Lowell, Massachusetts, is a regional transit system that operates 18 fixed routes. It provides public transit services in the Lowell metropolitan area, which includes the Towns of Billerica, Chelmsford, Dracut, Tewksbury, Tyngsborough, and Westford, in Middlesex County. Lowell Regional Transit Authority provides fixed route bus and ADA complementary paratransit service. About 338,186 people live in the LRTA service area, which covers about 282 square miles.

4.1 Introduction to Paratransit Services and Organizational Structure

LRTA's paratransit service area encompasses an area of 282 square miles. LRTA provides paratransit service, known as "Road Runner," with its fleet of 21 vehicles, operated directly by LRTA. At the time of the review, LRTA was unable to determine the number of eligible passengers. The LRTA Road Runner service provides both an ADA service and a senior dial-a-ride (DAR) service in partnership with the Councils on Aging. The DAR service is available to anyone 60 years of age or older. Road Runner provided a total of 61,196 trips in the 12 months ending September 30, 2015. Of the total annual trips provided, 31,263, or 51%, were ADA trips and 29,933, or 49%, were DAR trips.

LRTA provides connection to the northern terminus of the Massachusetts Bay Transportation Authority (MBTA) train service at the Gallagher Intermodal Center, in Downtown Lowell. The Kennedy Bus Transfer Center is also located at the terminal for local and long-distance bus service.

5. Scope and Methodology

The purpose of this review is to provide FTA with a tool for determining whether a public operator of a fixed-route system is in compliance with the paratransit requirements under DOT ADA regulations. However, the deficiencies identified and findings made in this report are by necessity limited to the information available to and the observations made by the review team at the time of the site visit. A lack of findings in a particular review area does not constitute endorsement or approval of an entity's specific policies, procedures or operations; instead, it simply indicates that no deficiencies in the delivery of service were observed at the time of the review.

The scope of the review and the methodology employed by the review team is described in greater detail below.

5.1 Scope

The review focused on whether the LRTA Road Runner ADA paratransit service operates according to the service criteria specified in 49 CFR §37.131 of the DOT ADA regulations, and without capacity constraints prohibited under 49 CFR § 37.131(f). The review examined LRTA's service area, response time, fares, and hours and days of service, as well as its policies, standards and procedures for monitoring service provision, including on-time performance, on-board travel time, telephone hold times, and avoiding trip denials and missed trips. The review seeks to ascertain whether service is being provided to eligible individuals within at least the minimum required service area on a next-day basis, during the same hours and days as the fixed-route system, for not more than twice the fixed-route fare for the same trip; whether there are patterns or practices that result in a substantial number of trip limits, trip denials, untimely pickups, and/or trips of excessive length; policies which cause riders to arrive late to appointments; or long telephone hold times, as defined by the transit system's established standards (or typical practices if standards do not exist).

Overall, the complementary paratransit compliance review included the following regulatory requirements:

- Complaint resolution and compliance information (49 CFR §§ 27.13(b) and 27.121(b))
- Nondiscrimination (49 C.F.R. §37.5)
- Service under Contract (49 CFR § 37.23) (if applicable)
- Requirement for comparable complementary paratransit service (49 CFR §37.121)
- ADA paratransit eligibility: Standards (49 CFR §37.123)
- Paratransit eligibility process (49 CFR § 37.125) including:
 - Information is made available in accessible formats upon request
 - A decision is made within 21 days or presumptive eligibility is granted pending a decision
 - There is written notification of all decisions
 - All denials or conditional eligibility determinations are completed in writing with specific reasons for the decision
 - There is an administrative appeals process for denials and conditional eligibility determinations
 - Reasonable policies for suspending service to eligible riders who establish a pattern or practice of missing trips
 - Complementary paratransit service for visitors (49 C.F.R. §37.127)
 - Types of service (49 CFR § 37.129)

- Service criteria for complementary paratransit (49 CFR §37.131) including:
 - Service area
 - Response time
 - Fares
 - Trip purpose restrictions
 - Hours and days of service
 - Capacity constraints
- Subscription service (49 C.F.R. 133) (if applicable)
- Training requirements (49 C.F.R. 173)

5.2 Methodology

The FTA Office of Civil Rights sent a notification letter to LRTA's Administrator, James H. Scanlan, on July 31, 2015, confirming the dates for the review and requesting that information be sent to the review team in advance of the on-site visit. ([Attachment A](#)).

- Prior to the on-site visit, the review team examined the following service information:
- The LRTA's description of how its ADA complementary paratransit service is structured on the Part 37 regulations.
- Public information describing LRTA's ADA complementary paratransit service is provided in a brochure and on the LRTA website
- LRTA's guidelines and policies for ADA paratransit operations and compliance are contained in *Road Runner Americans with Disabilities Act ADA Dial-a-Ride Transportation Service*, *Lowell Regional Transit Authority Americans with Disabilities (ADA) Compliance Policy*, and the LRTA webpage "Roadrunner ADA Paratransit Services for Disabled Patrons" (<http://lrta.mooo.com/paratransit/>).
- As requested by the FTA, LRTA made additional information available during the visit:
- Copies of completed driver manifests for recent months
- Thirty-six months of service data, including the number of trips requested
- Records of consumer comments and complaints related to capacity issues: trip denials, on-time performance, travel time, and telephone access
- Procedures for passenger service reports reporting complaints and other incidents
- LRTA's summary of complaints
- A LRTA fleet roster
- A listing of paratransit employees and their start dates
- Capital and operating budgets and cost data

The on-site review of LRTA's ADA complementary paratransit service took place from October 19 – 22, 2015. The review began with an opening conference, held at 9 a.m. on Monday, October 19, at the LRTA offices at 145 Thorndike Street, Lowell, MA. The following people attended the meeting:

- James H. Scanlan, Administrator, LRTA
- David Bradley, Deputy Administrator, LRTA
- Laura Mitchell, General Manager, Lowell Transit Management Corporation
- Dick Garrett, Eligibility Review, LRTA
- Tom McDowell, Operations Manager, LRTA
- Chris Curry, Transit Planner, North Middlesex Council of Governments
- John Day, FTA ADA Team Leader (via telephone)

- Geoffrey Ames, Review Team Leader, Meeting the Challenge, Inc.
- Philip Williams, Review Team Member, Meeting the Challenge, Inc.
- Crystal Lyons, Review Team Member, Crystal Fortune Lyons, LLC
- Gregory Dreyer, Review Team Member, Transportation Consultant

Following the opening conference, the review team met with LRTA staff to discuss the information sent in advance, as well as the information and material which was available on site. LRTA policies and procedures were discussed.

For the remainder of the day, Monday, October 19, the review team discussed the process in place, at LRTA, to record and respond to customer complaints, and requested the same from recent months. The review team discussed the eligibility process with LRTA staff and gathered eligibility files to examine. In the afternoon, the review team interviewed drivers and observed the process for taking reservations.

On Tuesday, October 20, the review team continued its observations of the trip reservation, scheduling, and dispatching processes. The review team met with the reservationist(s) and scheduler(s) to discuss procedures used to develop the final driver manifest, and began examining completed driver manifests, as a part of verification of the Transit System's on-time performance. The review team conducted driver interviews and continued reviewing eligibility files and interviewing LRTA staff, on the eligibility determination process.

The review team paid particular attention to policies, regarding trip reservations, and whether LRTA used any form of trip caps or waiting lists. In addition, the review team researched whether there appeared to be a pattern or practice of denying a significant number of trip requests. This portion of the review examined the policies and procedures concerning negotiation of requested trip times.

The review team gathered and analyzed the following information:

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

On Wednesday, October 21, the review team completed driver interviews, continued examining on-time performance, on-board travel times, and eligibility determination records. The review team compared on-board paratransit travel times to those on the fixed route service, with an emphasis on paratransit trips with lengthy travel times. Review Team members interviewed LRTA staff regarding resources, budgeting, and staffing. The scheduler/dispatcher was interviewed, regarding the scheduling and dispatching processes.

On Thursday, October 22, the review team finished tabulating the various data which had been gathered, drafted a report detailing review findings, and prepared for the exit conference.

The exit conference took place on Thursday, October 22, at 3 p.m., at the LRTA office. Attending the conference was:

- James H. Scanlan, Administrator, LRTA
- David Bradley, Deputy Administrator, LRTA
- Laura Mitchell, General Manager, Lowell Transit Management Corporation

- Dick Garrett, Eligibility Review, LRTA
- Tom McDowell, Operations Manager, LRTA
- Chris Curry, Transit Planner, North Middlesex Council of Governments
- John Day, FTA ADA Team Leader (via telephone)
- Geoffrey Ames, Review Team Leader, Meeting the Challenge, Inc.
- Philip Williams, Review Team Member, Meeting the Challenge, Inc.
- Crystal Lyons, Review Team Member, Crystal Fortune Lyons, LLC
- Gregory Dreyer, Review Team Member, Transportation Consultant

The Review Team provided a draft copy of the report to LRTA for review and response. A copy of the correspondence received from LRTA on May 6, 2016, documenting their response to the draft report, is included as [Attachment B](#).

5.3 Stakeholder Interviews

This section discusses information on the service or policy issues resulting from interviews, with representatives from the local disability community and local disability advocacy organizations, concerning the subject of this review. A total of seven individuals volunteered to be interviewed. One individual was an advocate for a local disability organization. Five of the individuals, who volunteered, were Road Runner passengers who were blind or visually impaired. One individual was a Road Runner passenger who had a mobility impairment.

A total of seven different disability organizations in the general vicinity of North Middlesex County were solicited prior to the site-visit for volunteer subjects. Ultimately, no volunteers came from this effort. Finally, at the review team's request, LRTA reached out to Road Runner passengers to find subjects for interviews.

The interviews, conducted in the week prior to and during the site-visit, were productive. The interviewees consistently identified LRTA's phone system as a source of frustration. One interviewee stated, "The phone system is awful." Most said that they were put on hold every time they called. Two interviewees expressed optimism that management of the phones is improving. This might reflect that LRTA recently hired a part time reservationist to assist with phones. One interviewee commented that Road Runner service has expanded into evening hours, but no one is available in the call center to answer the phones.

Interviewees consistently praised Road Runner's drivers. One said, "The drivers are great." Several interviewees reported that Road Runner's drivers go out of their way to help people.

Interviewees consistently responded that buses arrive on time, most of the time. However, most do not clearly understand the scheduling process or the pickup window timing. Specific issues that are misunderstandings of several of the interviewees include the following:

- Reservations must be made 24 hours in advance or at the latest by 3:00 p.m. the day prior to travel
- Rides, on Saturdays and holidays, with limited service, are provided only for dialysis
- Trips will not be scheduled for messages left on voicemail

A number of the interviewees reported that a former member of Road Runner's staff had threatened them, if they were to complain about Road Runner service.

One interviewee, an individual who is blind, reported that she was originally denied ADA paratransit eligibility, despite the fact that no sidewalk (accessible route) connects to the bus stop closest to her

residence. The eligibility determination was reversed after she contacted the FTA Region 1 Civil Rights Officer.

The executive director of the Lowell Association for the Blind reported that her clients are confused about the differences between ADA paratransit eligibility and eligibility for older adult trips and that service criteria for the two services, which use the same buses, are not clearly explained to applicants.

[Attachment D](#) is a list of the interview questions.

6. Findings and Advisory Comments

This chapter details the findings for each of the areas pertinent to the regulations found in 49 CFR Sections 27, 37 and 38 outlined in the Scope and Methodology section above. For each area, an overview of the relevant regulations and a discussion of the regulations, as they apply to Lowell Regional Transit Authority's paratransit system, is provided below, with corrective actions and a timetable to correct deficiencies for each of the requirements and sub-requirements, where necessary

Findings are expressed in terms of "deficiency" or "no deficiency." Findings of deficiency denote policies or practices found to be not in compliance, with DOT ADA regulations or matters, for which FTA requires additional reporting, to determine whether an ADA compliance issue exists.

Findings of deficiency shall always require corrective action and/or additional reporting, and will always be expressed as:

- A statement concerning the policy or practice in question at the time of the review.
- A statement concerning the DOT ADA requirements being violated or potentially being violated.
- A statement concerning the required corrective action to resolve the issue.

Advisory comments are statements detailing recommended or suggested changes to policies or practices, to ensure effective practices under the ADA or otherwise assist the entity in achieving or maintaining compliance.

6.1 Comparable Complementary Paratransit Service

Requirement: Under 49 CFR 37.121, the transit agency operating a fixed route system must provide paratransit service, to individuals with disabilities, that is comparable to the level of service provided to individuals without disabilities, who use the fixed route system.

Discussion: During this compliance review, no deficiencies were found with the requirement to provide paratransit service to individuals with disabilities which is comparable to the level of service provided to individuals without disabilities who use the fixed route system. No deficiencies were found with how LRTA communicates information on ADA paratransit service. LRTA Road Runner provides ADA complementary paratransit service, which strives to be comparable to its fixed route system.

Corrective Action Schedule: None required.

6.2 Paratransit Eligibility Process

Absence of Administrative Burdens

Requirement: Under 49 CFR 37.125, the transit agency must establish an eligibility process for complementary paratransit. The process may not impose unreasonable administrative burdens on applicants, and, since it is part of the entity's nondiscrimination obligations under §37.5(d), may not involve "user fees" or application fees to the applicant.

Discussion: During this compliance review, no deficiencies were found with the requirement to not impose unreasonable administrative burdens on applicants.

An advisory comment is made regarding this requirement. Public information materials state that if eligibility is approved, the applicant will receive their photo identification card from the Road Runner office. According to LRTA Road Runner Operations Manager, no photo identification is required for ADA eligible paratransit riders. The review team observed numerous facility access barriers at the Road Runner administrative office.

Advisory Comment: When LRTA clarifies their contradictory position on photo requirements for ADA paratransit eligible riders, they must be certain to provide free transportation to and from the Road Runner office for photo processing. If paratransit riders are required to visit the Road Runner administrative office for photo processing, ensure the facility has an accessible route from the public right-of-way and is otherwise accessible to and usable by persons with disabilities, including wheelchair users.

6.3 Paratransit Eligibility Standards

Requirement: Under 49 CFR 37.123 (e)(1) – (3), the transit agency’s eligibility processes, application materials and public information must be comprehensive enough to permit the transit system to determine that the following individuals are ADA paratransit eligible:

- Any individual with a disability who is unable, as the result of a physical or mental impairment (including a vision impairment), and without the assistance of another individual (except the operator of a wheelchair lift or other boarding assistance device), to board, ride, or disembark, from any vehicle on the system, which is readily accessible to and usable by individuals with disabilities.
- Any individual, with a disability, who needs the assistance of a wheelchair lift or other boarding assistance device and is able, with such assistance, to board, ride and disembark from any vehicle which is readily accessible to and usable by individuals with disabilities.
- Any individual, with a disability, who has a specific impairment-related condition, which prevents the individual from traveling to a boarding location or from a disembarking location.

Discussion: During this compliance review, deficiencies were found with the requirements related to the paratransit eligibility process.

LRTA commingles ADA paratransit eligible and Senior Dial-a-Ride riders. The eligibility criteria for Senior Dial-a-Ride are that the applicant must be 60 years of age, or more, and reside in the LRTA service area. In addition to Lowell, villages served by LRTA Senior Dial-a-Ride include Chelmsford, Dracut, Billerica and Tewksbury. A one-page application form for Senior Dial-a-Ride service can be found on the LRTA website. Seniors must make reservations at least two days in advance, are limited to where they can travel, are offered services on certain hours of the day and days of the week, and are provided no service on holidays that LRTA operates on a Saturday schedule. LRTA staff stated that, in some communities within LRTA service area, Senior Dial-a-Ride eligible riders may go to destinations beyond the LRTA fixed route $\frac{3}{4}$ mile corridor. This is determined by the agreement with the individual village and the destinations within the village.

LRTA public information brochures state, “The LRTA Fixed Route bus service provides wheelchair accessible transportation throughout the communities of Billerica, Burlington, Chelmsford, Dracut, Lowell, Tewksbury, Tyngsborough, Westford and Wilmington” and “The ADA service area covers $\frac{3}{4}$ of a mile around all LRTA bus routes. This includes Lowell, Billerica, Chelmsford, Dracut, Tewksbury, Tyngsborough, and Westford.”

An ADA paratransit eligible rider qualifies for a level of service that exceeds that of the Senior Dial-a-Ride rider. However, as noted above, there may be instances where a Senior Dial-a-Ride rider has access to destinations that are beyond the LRTA fixed route $\frac{3}{4}$ mile service area.

In discussion with the review team, LRTA stated that they have not certified any riders as dual eligible and, to their knowledge, no rider designated as Senior Dial-a-Ride eligible has become ADA paratransit eligible over time. In the final on-site interview with the Paratransit Liaison, he stated “dispatch prefers senior trips”, and “I always circle the birthdate [on the application] first.” As noted above, ADA paratransit and Senior Dial-a-Ride provide different levels of service. In most particulars, ADA

paratransit has higher service criteria than Senior Dial-a-Ride. Senior Dial-a-Ride does, however, does provide trips to some locations outside of the ADA paratransit service area.

Logically, some individuals who are ADA paratransit eligible must age into Senior Dial-a-Ride eligibility. Logically, some individuals who are over 60, must have acquired limitations that would make them, at minimum, conditionally eligible to use ADA paratransit. Therefore, it is not reasonable that LRTA has not granted dual eligibility to anyone. Whether intentionally or through a flawed eligibility process, there must be individuals over the age of 60, whom LRTA ought to have granted ADA paratransit eligibility, who have received only Senior Dial-a-Ride eligibility.

Eligibility Process and Application Materials

LRTA uses a five-page paper application process to determine ADA paratransit eligibility. No in-person assessment is required. Applicants are found unconditionally eligible, or conditional/temporarily eligible, or ineligible.

LRTA staff could give no number to the current amount of ADA paratransit eligible individuals. LRTA has a database of customers eligible for ADA paratransit or Senior Dial-a-Ride services. LRTA staff report that they are unable to derive a total number of individuals who are ADA paratransit eligible from their database.

LRTA has not established written standards, policies and procedures for the processing, review, documentation, and reporting of eligibility applications. At the time of the site visit, a LRTA employee was not effectively tracking the eligibility process. The employee was unable to provide an example of the instrument used to track the application process status. The employee utilizes a date-stamped envelope process for tracking the number of days LRTA takes to process each application.

LRTA provided sample paratransit eligibility determination letters (see [Attachment E](#), Sample Eligibility Determination Letter, and [Attachment G](#), Sample Eligibility Denial Letter).

The review team analyzed 26 LRTA applications received between June 2015 and October 2015.

Reasons for denying eligibility were potentially inappropriate. Some determinations did not take into consideration the functional abilities or the most limiting conditions of the applicant.

An example, from one applicant's letter of determination – ineligible: "(1) You live right on the bus route and your doctor states you can complete nearly all of our mobility questions. (2) You would be eligible for our discounted disability pass to ride the bus and your PCA could accompany you for free."

The review team noted some applicants that were Senior Dial-a-Ride eligible may actually be ADA eligible. When the Paratransit Liaison was asked about a specific applicant, he stated that "most of the checks were yes, so he is not ADA eligible." On one particular application, the health care professional, along with providing the diagnosis, checked that the rider could walk safely ¼ mile, without assistance of another person, and added 'maximum'. This limiting condition was not taken into account by staff. Applicant was found ineligible because "most of the checks were yes." Applicant's birthdate was circled.

Information received from LRTA states that from July 31, 2014 to July 31, 2015, LRTA processed 220 applications for ADA eligibility, with 32 applications being denied. This is a 14.5% eligibility denial rate. Per National Transit Institute (NTI) Comprehensive ADA Paratransit Eligibility workshop information, industry average is 1-2% eligibility denials for paper applications.

Some applicants were determined to be ineligible based on the fact that the applicant did not reside within the service area. At the time of the review, employee stated that as of two weeks ago, he no longer automatically denies eligibility based on where an applicant resides.

As noted above, in the final on-site interview with the Paratransit Liaison, he stated “dispatch prefers senior trips”, and “I always circle the birthdate [on the application] first.” LRTA staff made no explicit statements indicating that they deliberately steer applicants, who are over the age of 60, to the Dial-a-Ride service, even when staff knows that the applicants have conditions that would otherwise make them eligible for ADA paratransit. The review team has no evidence of the intentions of LRTA staff. The review team is concerned that in practice some applicants might have been granted Dial-a-Ride eligibility, when their disabilities warranted ADA paratransit eligibility.

Due to the high rate of ADA paratransit eligibility denials and the fact that applicants are considered eligible for either ADA paratransit service or Senior Dial-a-Ride and never both, it is possible that applicants are being denied service for which they may be qualified.

Public Information

LRTA public information materials regarding Road Runner eligibility and services contain confusing and conflicting information. For example, the Road Runner brochure dated July 2014 which is the ADA paratransit information provided to Road Runner applicants along with their notice of unconditional or conditional eligibility, requires a photo identification card for riders to use Road Runner. The brochure states, “If approved, you will receive your photo identification card from the Road Runner office (listed above) and you will be ready to use the service.” LRTA staff state that no photo identification is required.

Advisory Comment: It is an effective practice to provide clear, consistent public information materials regarding eligibility criteria and the process for applying for paratransit service. When LRTA completes the actions below, LRTA should provide updated public information materials to reflect current policies and provide notice that Senior Dial-a-Ride riders may apply for ADA paratransit service.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must provide to FTA, for review, the following items:

- Written eligibility and eligibility appeals policies and processes, including performance standards, tracking, and reporting activities;
- A revised ADA paratransit application, which can be used to ascertain the functional abilities of individuals with intellectual, cognitive, mobility, vision, mental health, and other disabilities, to travel independently; and
- A review of eligibility for all applicants determined ineligible for ADA paratransit service, over the past two years, to ensure that appropriate determinations were made and ensure riders are receiving full benefits of any classification for which they are qualified and not forgoing eligibility for one program or another.
- Documentation showing that individuals over the age of 60 who meet the eligibility criteria are granted eligibility for ADA paratransit.

Accessible Information

Requirement: Under 49 CFR 37.125(b), the transit agency must make all information about the process, materials necessary to apply for eligibility, and notices and determinations concerning eligibility available in accessible formats, either as a rule or upon request.

Discussion: During this compliance review, deficiencies were found with the requirement to provide accessible eligibility information. LRTA communicates the availability of materials in certain accessible formats. The reviewers observed LRTA does not recognize requests for accessible format during the eligibility application review process. Reviewers observed LRTA employee providing handwritten responses to applicants when applicant clearly requested large print on the eligibility application form.

The employee also sends hand written personal notes and eligibility form letter determination factors to applicants. The practice of providing information in cursive makes the document inaccessible to many individuals.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must develop a plan for providing information in accessible formats usable to individuals who request them, and discontinue the practice of sending hand written notes and forms to applicants.

Eligibility Determinations or Presumptive Eligibility within 21 Days

Requirement: Under 49 CFR 37.125(c), if the transit agency has not made an eligibility determination on the 21st day following the submission of a completed application, it must treat the applicant as eligible, on the 22nd day, and have a process in place, to provide service to the applicant, beginning on the 22nd day, and until the eligibility determination has been made. The transit agency's process must communicate the right, to this presumptive eligibility, to applicants, so they are aware of their rights to schedule and use the service, beginning on the 22nd day.

Discussion: During this compliance review, deficiencies were found with the requirement to have a presumptive eligibility process in place. Deficiencies were found with how the transit agency communicates presumptive eligibility to applicants.

The review team analyzed 26 LRTA applications received between June 2015 and October 2015. As far as review team could determine, all applications were processed within 21 days.

LRTA written policies and public information does not provide clear information informing applicants of their rights to schedule and use the service, beginning on the 22nd day.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must amend its ADA Eligibility Policy to include a statement that Road Runner will provide presumptive eligibility, beginning on the 22nd day after receiving a completed application, until it has made an eligibility determination. LRTA must inform applicants of their right to receive LRTA service accordingly and must include this information on the application form within other public information materials, and on the agency website.

Written Eligibility Determinations including Specific Reasons for Denials or Temporary or Conditional Eligibility Determinations

Requirement: Under 49 CFR 37.125(d), determinations of eligibility must be made in writing. If applicants are found to be ineligible, the determination must state the specific reasons, for the decision (a mere statement that the applicant has been found to be ineligible is not sufficient). If an individual has been determined to be conditionally or temporarily eligible, the determination must state the conditions under which eligibility is granted and the basis for that determination. Information concerning the applicant's right to appeal, under §37.125(g), must also be provided.

Discussion: During this compliance review, deficiencies were found with the requirement to make eligibility determinations in writing and with how the transit agency communicates eligibility determinations.

The review team analyzed 26 LRTA applications received between June 2015 and October 2015.

Of the 26 applications: nine eligibility determination letters indicated Ineligible status; twelve of the eligibility determination letters indicated Unconditional Eligibility status; and five of the eligibility determination letters indicated Conditional Eligibility status. LRTA incorrectly uses the phrase "Conditional Eligibility" to denote temporary status. Conditional Eligibility and Temporary Eligibility are not the same.

Of the 26 eligibility determination letters observed, none included the complete telephone number of LRTA paratransit coordinator. The 12 Unconditional Eligibility determination letters did not include an expiration date for eligibility, although the letters state, “certification is valid for three years.” All 26 eligibility determination letters contained the name of the eligible individual, in handwritten format.

The telephone number provided in the eligibility determination letter is not sufficient to reach the paratransit liaison. A specific extension number is required but not provided in the letters reviewed during site visit.

LRTA did not acknowledge, in some letters of unconditional determination that the eligible riders have registered to travel with personal care attendants (PCA). LRTA policy states, “You must be registered as requiring a PCA.”

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must develop a written policy regarding the content of eligibility determination letters, to ensure all of the required specific information is included in all eligibility determination letters. The documentation shall include the name of the eligible individual, the name of the transit provider, and the complete telephone number of the entity's paratransit coordinator. For applicants found to be ineligible, the determination must state the specific reasons for the decision. For applicants found to be conditionally eligible, the determination must state the conditions under which eligibility is granted and the basis for that determination. For applicants found to be temporarily eligible, the determination must state the temporary condition for which eligibility is granted, and should include an expiration date for eligibility. The determination should clearly indicate whether eligibility is conditional or temporary. The determination must include information concerning the applicant's right to appeal.

Recertification of Eligibility at Reasonable Intervals

Requirement: Under 49 CFR 37.125(f), the transit agency is permitted to require paratransit riders to recertify eligibility, at reasonable intervals. As stated in Appendix D, a reasonable interval would be between one and three years.

Discussion: During this compliance review, deficiencies were found with the recertification process.

LRTA written policy states LRTA will require recertification every 5 years, however, the eligibility determination letter for Unconditional Eligibility states, “certification is valid for 3 years.” In practice, LRTA staff cannot recall recertifying anyone.

Corrective Action Schedule Within 60 days LRTA must correct the discrepancies concerning recertification between its written policy, its eligibility determination letters, and its practices.

Administrative Appeals Process for Denials or Decisions Granting Conditional or Temporary Eligibility

Requirement: Under 49 CFR §37.125(g), the transit agency must have a process for administering appeals, through which individuals who are denied eligibility can obtain review of the denial. The transit agency is permitted to require written notice that the applicant wishes to exercise his or her right to an appeal hearing, within 60 days of its written decision denying or limiting eligibility. The transit agency cannot require the “filing of a written appeal.”

The appeal process must include an opportunity for the applicant to be heard and to present information and arguments, with appropriate separation of authority (i.e., a decision by a person not involved with the initial decision to deny eligibility). Appeal decisions must be provided in writing and explain the reasons for denying the appeal. The appeal hearing must be scheduled, within a reasonable amount to time, and if a decision has not been 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, as required.

Discussion: During this compliance review, deficiencies were found with the requirements of the process for appealing eligibility denials.

LRTA's appeal process, as noted in the LRTA Appeal Process document ([Attachment H](#)), improperly requires applicants to document the basis for their appeal. The policy states, "Your written appeal must state your reasons why you feel that the determination of ineligibility is unjust."

LRTA Appeal Process document does not contain contact information, address, telephone number, or point of contact.

LRTA appeal process policy does not state that LRTA considers separation of duties in the composition of the appeal board. The written LRTA Appeal Process ([Attachment H](#)), provided to the review team, states, "Staff of the Lowell Regional Transit Authority will serve as the appeal board." This document also states, "The decision of the appeal board is final." The ADA Appeal Process, found on LRTA's website, states, "Appeals must be submitted to the General Manager." The website policy also states, "...a decision will be made by the General Manager." It is not clear that LRTA separates duties, in practice. Section 37.125(g)(2) requires a separation of functions, meaning that, to the extent practicable, the individuals deciding appeals were not involved with the applicant's initial eligibility determination, including working in the same office as, supervising, or working for the original decisionmaker.

The printed Appeal Process document provided to applicants who have been denied eligibility does not reflect the information provided in LRTA written policy and public information, regarding the LRTA appeal process.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must revise its appeals process to include the following:

- an opportunity to be heard and to present information and arguments, and
- separation of functions (i.e., a decision by a person not involved with the initial decision to deny eligibility).

Complementary Paratransit for Visitors

Requirement: Under 49 CFR 37.127(d) and (e), paratransit service must be made available to visitors not residing in the jurisdiction(s) served by LRTA, for any combination of 21 days during any 365-day period, beginning with the visitor's first use of the service, during the 365-day period. The transit system must treat as eligible, all visitors who present information that they are eligible for paratransit service in the jurisdiction in which they reside. For those who do not present such documentation, the transit system must accept a certification that they are unable to use fixed-route service. In no case may the transit system require a visitor to apply for or receive eligibility certification, for its own paratransit system, before providing this service.

Discussion: During this compliance review, deficiencies were found with the requirement to make paratransit service available to visitors. LRTA's written policy inaccurately states that visitors will remain eligible to use LRTA ADA paratransit services, for 21 days from the date of their first ride. The policy does not clarify that visitors may be served by LRTA for any combination of 21 days, during any 365-day period, beginning with the visitor's first use of the service.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must provide to FTA for review the revised public information (written and electronic) regarding the availability of visitor service for a period of 21 days within a 365-day period following the visitor's first use of the service.

6.4 Types of Service

Requirement: Under 49 CFR 37.129(a), the transit agency's ADA complementary paratransit service must be provided on an origin-to destination-basis. The transit agency may determine through its local planning process whether to establish either door-to-door or curb-to-curb service as the basic mode of paratransit service. Where the local planning process establishes curb-to-curb service as the basic paratransit service mode, however, provision must still be made to ensure that the service available to each passenger actually gets the passenger from his or her point of origin to his or her destination point. To meet this origin to destination requirement, service may need to be provided to some individuals, or at some locations, in a way that goes beyond curb-to-curb service.

Discussion: During this compliance review, no deficiencies were found with the requirement to provide origin to destination service to eligible riders or with LRTA's procedures to provide additional assistance beyond the curb, if needed, due to disability for eligible riders to complete their trips. An advisory comment is made, however, concerning the means by which this information is communicated to riders. LRTA's website describes Roadrunner ADA Paratransit Services for Disabled Persons as both a "door to door" service and an "origin to destination service." In interviews, drivers did not use the term "door-to-door", however all answered in the affirmative when asked, "Do you provide assistance beyond the curb (e.g., to the door) if needed?" However, the brochure given to riders/applicants does not include any information regarding origin to destination service.

Advisory comment: It is an effective practice to ensure that riders and potential riders are provided with accurate and consistent information concerning the nature of the service.

6.5 Service Criteria for Complementary Paratransit

Requirement: Section 12143(c)(3) of the ADA directed the Secretary of Transportation to establish minimum criteria to establish service criteria to be used when determining whether the service provided by paratransit is comparable to the regular fixed-route system. These criteria are contained in 49 CFR 37.131, and include service area, response time, fares, hours and days of service, and prohibit restrictions on trip purpose and capacity constraints that limit the availability of service to eligible individuals. The review team assessed the transit agency's ADA paratransit system using these criteria as described below.

Service Area

Requirement: Under 49 CFR 37.131(a)(1), all public operators of a fixed-route system must provide complementary paratransit service that covers, at a minimum, all areas within a 3/4-mile radius of all of its bus routes, and within a "core service area" that includes any small areas that may be more than 3/4-mile from a bus route, but are otherwise surrounded by served corridors. This includes any areas that cross political boundaries or taxing jurisdictions, but are within a 3/4-mile radius of a 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 must also include 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.

Discussion: During this compliance review, no deficiencies were found with the requirement to provide ADA paratransit service available to eligible individuals to and from origins and destinations within the service area. No deficiencies were found with how the transit agency communicates the service area to eligible riders and potential applicants.

LRTA provides fixed route service Monday through Saturday, however, service hours are shorter on Saturdays. The service areas are reduced and Route 11 does not operate on Saturdays. Road Runner operates fewer buses on Saturdays, but matches the service area and hours of the fixed route service.

Corrective Action Schedule: None required.

Response Time

Requirements: Under 49 CFR 37.131(b), the transit agency must 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, including during times comparable to normal business hours on a day when the offices are not open before a service day. Reservations may be taken by reservation agents or by mechanical means. Under 49 CFR 37.131(b)(2), while the transit agency may negotiate pickup times with the rider prior to the trip being scheduled, it cannot require the rider to schedule a trip to begin more than one hour before or after the individual's desired departure time. Any greater deviation would exceed the bounds of comparability. The transit agency must have policies and procedures in place to ensure that schedulers and dispatchers do not adjust the rider's negotiated pickup time or the pickup window without the rider's consent.

Under 49 CFR 37.131(b)(4), if the transit agency proposes to change its reservations system, it shall comply with the public participation requirements equivalent to those of §37.137 (b) and (c). The transit agency may permit advance reservations to be made up to 14 days in advance of an eligible individual's desired trips, subject to the same trip negotiation requirements as next-day trips required under §37.131(b)(2).

Discussion: During this compliance review, deficiencies were found with the response time requirement regarding how LRTA communicates the reservation, pick-up time negotiation, change processes, and schedule changes to eligible riders.

LRTA's ADA Reservation Policy instructs callers to tell reservationists, "What time you would like to be at your destination." In practice, reservationists initially attempt to set pickup times relative to customer's appointment time or desired arrival time. It was not clear to the review team that reservationists have much practice with negotiating trips to begin within an hour before or after the customer's requested pickup time. LRTA does not include, in information it provides to customers, the requirement for trips to be negotiated based on customers requested travel time. This can be problematic for riders who do not have a desired arrival time, but whose departure times are constrained (for example, someone who cannot leave work before 5:00).

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must provide an updated reservation policy that accounts for riders' desired pickup times, including negotiation as necessary within one hour before or after such times.

Fares

Requirement: Under 49 CFR §37.131(c), ADA paratransit fares must 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. The transit agency must allow eligible riders to travel with at least one companion (with additional companions accommodated on a space-available basis). If the passenger is accompanied by a personal care attendant (PCA), the transit system must provide service to one companion in addition to the PCA. Companions may be charged the same fare as the eligible rider; no fare may be charged for a PCA.

Discussion: During this compliance review, no deficiencies were found with the requirements for comparable paratransit fares, or policies or practices concerning fares, PCAs, or companions, or with how the transit agency communicates these policies and procedures to eligible riders. Road Runner fares are less than twice the fare for a similar trip using the fixed route system, and are typically the same as the fixed route fare.

Corrective Action Schedule: None required.

No Trip Purpose Restrictions

Requirement: Under 49 CFR 37.131(d), there can be no restrictions or priorities based on trip purpose. When a user reserves a trip, the entity will need to know the origin, destination, time of travel, and how many people are traveling. The entity does not need to know why the person is traveling, and should not even ask.

Discussion: During this compliance review, no deficiencies were found with the requirements that ADA paratransit service be provided free from restrictions or priorities, based on trip purpose, in written policies and procedures within the eligibility process, and observed reservation and scheduling practices. As Road Runner provides coordinated service for older adults with its Dial-a-Ride service, reservationists must determine whether each caller is requesting an ADA paratransit ride or a Dial-a-Ride for older adults. ADA trips take priority over Dial-a-Ride trips. Reservationists, accordingly, ask the type of trip (i.e., ADA or DAR), but not the purpose.

Corrective Action Schedule: None required.

Hours and Days of Service

Requirement: 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.

Discussion: During this compliance review, no deficiencies were found with the requirements that ADA paratransit service be provided for the same days and hours of service as fixed route service.

LRTA provides fixed route service Monday through Saturday, however, service hours are shorter on Saturdays. The service areas are reduced and Route 11 does not operate on Saturdays. Road Runner operates fewer buses on Saturdays, but matches the service area and hours of the fixed route service.

Corrective Action Schedule: None required.

6.6 Absence of Capacity Constraints

Requirement: Under 49 CFR 37.131(f), the transit agency may not limit the availability of complementary paratransit service to ADA paratransit eligible individuals by any of the following: restrictions on the number of trips an individual will be provided; waiting lists for access to the service; or any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons. Such patterns or practices include, but are not limited to, substantial numbers of significantly untimely pickups for initial or return trips, substantial numbers of trip denials or missed trips, or substantial numbers of trips with excessive trip lengths.

Discussion: During this compliance review, deficiencies were found with the requirements concerning operational patterns or practices that significantly limit the availability of service to ADA paratransit eligible persons. LRTA lacks operational policies, procedures, and service standards to identify, document, manage, and report on capacity denials, missed trips, late pickups or drop-offs, or overly long trips. Data derived from independent analysis, by the review team, suggests the presence of practices, policies, or procedures that might significantly limit service availability.

Because there are no written policies, procedures, and service standards, the data provided the review team is of questionable accuracy. In addition, LRTA is in the process of moving from hand-written manifests to digital manifests via handheld devices. This is a positive move, however, differences between the written and digital manifests were apparent.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must develop and implement operational policies, procedures, and service standards to identify, document, manage, and report on capacity denials, missed trips, late pickups or drop-offs, or overly long trips.

No restrictions on the number of trips provided to an eligible individual

Requirement: Under 49 CFR 37.131(f)(1), the transit agency may not impose restrictions on the number of trips that will be provided to an eligible rider.

Discussion: During this compliance review, no deficiencies were found with the requirements that ADA paratransit service be provided without limiting the number of trips that an eligible rider may take. No deficiencies were found with how the transit agency communicates this requirement to eligible riders and potential users of the service. There is no evidence that LRTA acts in any way to restrict the number of trips taken by eligible riders.

Corrective Action Schedule: None required.

No waiting list for access to the service

Requirement: Under 49 CFR 37.131(f)(2), the transit agency is prohibited from establishing policies or engaging in practices and/or procedures which establish waiting list(s) for accessing the service.¹

Discussion: During this compliance review, no deficiencies were found with the requirements that ADA paratransit service be provided, without the use of waiting list(s), for access to the non-subscription portion of the service. There is no evidence that LRTA acts in any way to place eligible riders on a waiting list.

Corrective Action Schedule: None required.

No substantial numbers of significantly untimely pickups for initial or return trips

Requirement: Under 49 CFR 37.131(f)(3)(i)(A), the transit agency must provide ADA paratransit service without any substantial numbers of significantly untimely pickups for initial or return trips.

Discussion: During this compliance review, deficiencies were found with the requirements that ADA paratransit service be provided within the transit agency's standards for defining when trips are timely and untimely. Deficiencies were found in LRTA's plan for monitoring service to determine whether capacity constraint exists.

LRTA has no performance standards for on-time pickups. LRTA has not established metrics or procedures to sufficiently monitor on-time performance. In addition, review team interviews with drivers revealed that not all drivers correctly identified the definition of the 30-minute pickup window (15 minutes before and 15 minutes after the scheduled pick up time).

The review team sampled manifests for two randomly chosen days, to determine whether LRTA provides trips in a timely manner (see [Attachment I](#), LRTA Road Runner On-Time Performance). Prior to this analysis, LRTA provided data which indicated on-time performance at rates of 90 percent or higher.

¹ Under §37.133(c), waiting lists may only be established for participation in subscription service that may be offered as part of the transit agency's paratransit system.

However, the review team's analysis of the two random days indicated on-time performance rates at 86 percent on June 25, 2015 and 67 percent on September 1, 2015. On-time performance in the 90 percent or higher range is generally considered acceptable. The review team questions the methodology by which LRTA calculates on-time performance. Trips within the 30-minute pick-up window should be considered on-time. Those trips outside the pick-up window should be considered either early or late.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must establish standards that clearly define and ensure timely pickups. LRTA must implement metrics, accurate reporting of data, and tracking procedures sufficient to facilitate ongoing monitoring of on-time performance.

No substantial numbers of trip denials or missed trips

Requirement: Under 49 CFR 37.131(f)(3)(i)(B), the transit agency must provide ADA paratransit service without substantial numbers of trip denials or transit agency missed trips. A denial occurs whenever a transit system is unable to provide a trip on a next-day basis as requested by an eligible passenger between points within the paratransit service area, at a time when the fixed-route system is operating, subject to the limitations on trip time negotiation. Under 49 CFR 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 a denial has occurred whether or not the passenger accepts a departure time of more than one hour earlier or later. In addition, when a denied trip makes a subsequent requested trip impossible, as could occur in the case of an individual taking a round trip to and from a specific location, two trips have been denied.

Discussion: During this compliance review, the review team found deficiencies with the requirements to provide ADA paratransit service without substantial numbers of trip denials or missed trips; with the LRTA's standards for defining denials and transit agency missed trips; and with LRTA's plan for monitoring service to determine whether or not either type of capacity constraint exists. The review team found these deficiencies because LRTA does not have any written performance standards for number of trip denials or missed trips. When asked by the review team, management could not define trip denials, on-time performance, missed trips, or excessively long trip standards.

The review team prepared the table below, for the six months ending September 30, 2015, with data provided from LRTA. The number of trips requested is equal to the number of trips scheduled. This suggests, to the review team, that there is no definition of a trip denial. Customers eventually canceled 22 percent of the scheduled trips. The review team felt that this was a high cancellation rate, although no industry standards could be found for acceptable advance cancellation rates. A high rate of cancellations does have the effect of limiting capacity of the service, by denying time slots to customers that want to make a trip. LRTA might want to conduct an informal survey of customers to determine reasons for cancellations. The data also shows the number of trips canceled on arrival and no shows.

LRTA ROAD RUNNER TRIP SCHEDULING SUMMARY

	2015					
	April	May	June	July	August	September
Trips Requested	3,611	3,364	3,636	3,753	3,305	3,662
Trips Scheduled	3,611	3,364	3,636	3,753	3,305	3,662
Trips Cancelled Ahead	792	759	828	916	725	708
Trips Provided	2,819	2,605	2,808	2,837	2,580	2,954
Trips Cancelled on Arrival	29	10	22	57	34	40
No Shows	37	47	40	37	29	36
Trips Confirmed	2,753	2,548	2,746	2,743	2,517	2,878

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must establish standards that clearly define trip denials and missed trips. LRTA must implement metrics, accurate reporting of data, and tracking procedures sufficient to identify and monitor any reservations, dispatch, or driving practices that might result in trip denials or missed trips.

Advisory Comment: Conduct a survey of a sample of customers to determine why customers cancelled trips.

No substantial numbers of trips with excessive trip lengths

Requirement: Under 49 CFR 37.131(f)(3)(i)(C), the transit agency must provide ADA paratransit service without substantial numbers of trips with excessive trip lengths.

Comparability is based on the length of time required to make a similar trip between the same two points using the fixed route system, including time spent traveling to and from a boarding point and waiting for the fixed route vehicle to arrive. FTA recommends basing paratransit travel time on the comparable fixed route travel time, plus 20-30 minutes to allow for a reasonable estimate of time spent walking to and from a bus stop, waiting for the bus to arrive, and making any necessary transfers from one vehicle to another.

Discussion: During this compliance review, deficiencies were found with the requirements that ADA paratransit service be provided without substantial numbers of trips with excessive lengths, as compared to fixed route transit bus service.

Road Runner data, in the table below, show there were 16,185 trips provided between May and September 2015. Of these, 271 trips had a trip length of 60 minutes or more. This amounts to 1.7% of total trips. Considering the number of trips provided, this is not considered to be substantial.

ROAD RUNNER TRIPS 60 MINUTES OR LONGER (May-September, 2015)

	TOTAL TRIPS PROVIDED	TRIPS 60-89 MIN.	TRIPS 90-119 MIN.	TRIPS 120+ MIN.
NUMBER	16,185	209	42	20
PCT. OF TOTAL		1.3%	0.3%	0.1%

The review team examined a random sample, of 12 trips in more detail and compared with a similar trip on the fixed route bus system (see [Attachment J](#), Road Runner Trips vs. Fixed Route Bus). All but two showed significantly longer trip times on paratransit as compared with a similar fixed route bus trip. This figure varied from 27 to 114 minutes.

The data were sorted by passenger name. Many of the passengers experiencing long trip times are regular users. Some of them are geographically distant from the places they travel to regularly, so this may also explain the longer travel times.

The review team, however, does question some of the extremely long trip times and is concerned that the data may not be accurate. Upon being presented with review team findings, Road Runner staff stated that travel times over 60 minutes would be an extremely rare occurrence. Road Runner's dispatcher indicated that the pick-up times might be wrong. The drivers enter the time of their arrival for pick-ups on return trips. Subsequent to that, perhaps because a rider is late getting out of a medical appointment, the schedule is altered and the driver leaves and returns sometime later. Drivers, in such instances, might erroneously document trip times from the original arrival time rather than the second arrival time. According to the dispatcher, this would appear – from the data – to be an excessively long trip time, but it actually represents a data error.

Road Runner staff should have a process for examining the excessive trip times, to determine if these are mistakes in entering data or if there are other issues that result in excessive trip lengths. In order to minimize the number of excessively long trips, regular monitoring is necessary to flag these trips and take action to eliminate the causes.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must establish standards that clearly define and identify excessively long trips. It is an effective practice to develop and review exception reports, on a monthly or weekly basis, to identify excessively long trips. A report listing trips having durations longer than 60 minutes is a useful starting place. Beyond that, understanding the required comparability between fixed route trip times and paratransit trip times is essential to isolating the trips that are of truly excessive length. Identifying such trips is a prerequisite to eliminating them.

No operational patterns or practices limiting the availability of service to ADA eligible people

Requirement: This section also prohibits any operational patterns or practices that significantly limit availability of service to ADA eligible people. Examples of such operational patterns or practices include insufficient capacity to take reservations, long telephone hold times, and untimely drop-offs for appointments.

Discussion: During this compliance review, deficiencies were found with the requirements that ADA paratransit service be provided without the use of any operational patterns or practices that significantly limit the availability of service to ADA eligible people.

Road Runner's phone system does not have the capacity to isolate information on hold times. All calls come in on one number for reservations, customer service, and "Where's my ride." Analysis of hold times and abandoned calls was difficult to impossible. Calls placed by the review team to the Road Runner phone number resulted in all calls eventually going to voice mail after just under four minutes. A caller is initially prompted to stay on the line or leave a message, and at about four minutes, the caller is instructed to leave a message.

As noted above, stakeholder interviewees consistently identified LRTA's phone system as a source of frustration. All interviewed stakeholders reported having difficulties with Road Runner's phone system. The difficulties included calls going directly to hold, extended time on hold, and eventually being routed to voicemail. Of seven interviewees, two did report that the phone service was better "than in the past."

During the on-site visit, two full-time operators staffed the call center. Normally one full time and one part time employee staff the call center. The review team did not observe any calls being placed on hold during the on-site visit. Typically, a full-time operator is scheduled from 6:00 a.m. to 2:15 p.m. and a part-time operator works from 1:00 p.m. to 5:00 p.m. The part-time position is a new position that was filled approximately five weeks prior to the on-site visit.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must produce a plan to eliminate excessive hold times for paratransit trip reservations, including metrics for hold times and abandoned calls. It is an effective practice to provide a phone system with discrete lines for making reservations and receiving "Where's my ride?" calls.

6.7 Subscription Service

Requirement: Under 49 CFR 37.133, transit agencies are permitted (but not required) to provide subscription service (pre-arranged trips at a particular time not requiring individual trip reservations for each trip). If provided, however, subscription service may not comprise more than 50 percent of the available trips at any given time unless the system is experiencing no capacity constraints.

Discussion: During this compliance review, no deficiencies were found with the requirements concerning the provision of subscription trips, as part of the ADA paratransit program. No deficiencies were found with how LRTA communicates this requirement, to eligible riders and potential users of the service.

6.8 Reasonable policies for proposed service suspensions for missing scheduled trips and the right to appeal

Requirement: 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.

Under 49 CFR §37.125(h)(1), trips missed by riders for reasons beyond their control, including trips missed due to operator or transit system error, must not form the transit agency's basis for determining that such a pattern or practice exists. The transit agency's policies must therefore distinguish between no-shows that are within the rider's control and those that are not, and propose sanctions only on the basis of the former. In order to establish whether a rider has engaged in a pattern or practice of missing scheduled trips, the transit agency must also account for a passenger's frequency of use. The appeals process required under §37.125(g) must be available to an individual on whom sanctions have been imposed, and the sanction must be stayed pending the outcome of the appeal.

Discussion: During this compliance review, deficiencies were found with the requirements concerning the transit agency's no-show and late cancellation policies and the reasonableness of proposed suspension periods and the required process for appealing proposed suspensions of service.

LRTA has a written policy and public information materials regarding cancellations and no-shows on its website. LRTA's *Cancellations and No Show Policy* (see [Attachment C](#)) includes "suspensions for person with a pattern or practice of missing scheduled trips." The policy does not quantify or define "pattern or practice." The policy does not include the duration of suspensions that would result from a pattern or practice of missing trips. The policy does not distinguish between no-shows that are within the rider's control and those that are not. The policy does not account for a passenger's frequency of use.

LRTA currently does not enforce its policy because, as a staff member reported, there is no confidence that data are accurate enough to substantiate that customers were at fault for missed trips.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must develop a no-show policy that accounts for a rider's frequency of trips, quantifies or defines a pattern or practice of missing scheduled trips, includes the duration of suspensions and distinguishes between no-shows that are within the rider's control and those that are not. Alternatively, LRTA may elect not to have a no-show policy and refrain from suspending riders on the basis of no-shows.

6.9 Complaint Resolution and Compliance Information

Requirements: Under §27.13(b), the transit agency must have administrative procedures in place that incorporate appropriate due process standards and provide for the prompt and equitable resolution of complaints. Under 27.121(b), the transit agency must keep all complaints of noncompliance on file for one year and a record of all such complaints (which may be in summary form) for five years

Discussion: During this compliance review, deficiencies were found with the requirement to resolve complaints promptly and equitably and keep summaries and records of complaints on file. The review team found deficiencies with how LRTA communicates its complaint procedure to applicants and eligible riders. LRTA does not properly track and resolve Road Runner complaints. LRTA does not properly document and maintain all Road Runner complaint records. LRTA does not document the resolution of complaints. LRTA does not have a document retention policy for Road Runner complaints. Public information materials do not clearly identify a designated employee responsible for ADA compliance.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must create and implement an effective policy and procedure to receive and resolve complaints promptly and equitably, and ensure that records are kept as required.

6.10 Nondiscrimination

Requirement: Under 49 CFR 37.5, the transit agency is prohibited from discriminating against an individual with a disability in connection with the provision of transportation service, or denying any individual with a disability the opportunity to use the transportation services it provides to the general public. Discriminatory practices include and are not limited to requiring the use of alternate transportation services, requiring persons with disabilities to be accompanied by an attendant, imposing user fees or special charges upon people with disabilities and requiring people with disabilities to use designated priority seating.

Discussion: During this compliance review, no deficiencies were found during review of the transit agency's public information and during the site visit. The review team did not observe any denial of service to people with disabilities (on the basis of disability, including and not limited to: requiring persons with disabilities to use ADA paratransit instead of the fixed-route system, requiring paratransit-

eligible riders and potential applicants to use other special transportation services rather than the ADA paratransit service such as may be operated by social and/or human-services agencies). The review team did not observe anyone requiring persons with disabilities to travel with Personal Care Attendants (PCA). The review team did not observe anyone imposing user fees or special charges upon people with disabilities. The review team did not observe anyone requiring people with disabilities to use designated priority seating.

Corrective Action Schedule: None required.

6.11 Training requirements

Requirement: Under 49 CFR 173, each public or private entity which operates a fixed route or demand responsive system shall ensure that personnel are trained to proficiency, as appropriate to their duties, so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service in a respectful and courteous way, with appropriate attention to the difference among individuals with disabilities.

Discussion: During this compliance review, deficiencies were found with the requirement to train personnel to proficiency, as appropriate to their duties.

Based upon driver and staff interviews, and observed activities, the review team concludes that more thorough and consistent understanding of the ADA's regulatory requirements would enhance performance and improve service delivery. In many instances, it is apparent that the lack of guiding policies and performance goals means that staff and drivers are not receiving enough direction from management. While driver interviews indicate that driver attitudes toward customers ensure courteous and respectful treatment, drivers lack consistent understanding of LRTA policies regarding pick-up windows, no-shows, and door-to-door service. The drivers report that they receive refresher training, but lack a general understanding of regulatory requirements for ADA paratransit.

From observations of reservationists phone conversations, it is apparent that reservationists do not fully comprehend the requirements for negotiating reservations with respect to Section 37.131(b)(2). Reservationists are very capable of scheduling trips that are constrained by a customer's desired arrival time (for appointments).

Current management by MV Transportation, Inc., dba Lowell Transit Management Corporation (MV) has initiated periodic viewing of video training modules for staff and drivers.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must develop more effective training procedures to ensure that staff are trained to proficiency in the performance of their duties.

6.12 Service Under Contract with a Private Entity (if applicable)

Requirements: Under 49 CFR 37.23, the transit agency must ensure that any private entity with which it has entered into a contract or other arrangement to provide ADA paratransit service meets all the obligations of the DOT ADA regulations, including those for service provision and vehicle acquisition, that the transit agency would be required to meet, if it provided the service directly.

The transit agency must have policies and procedures in place to monitor the performance of its contractor(s) and ensure that these requirements are met. The transit agency is not permitted to neglect monitoring or to limit its monitoring to the terms and conditions of its contract or other arrangement with the private entity or entities.

Discussion: During this compliance review, deficiencies were found with regard to ADA compliance issues for contracted ADA complementary service, including and not limited to service provision.

Deficiencies were found with how LRTA communicates, oversees, and/or manages its obligations, concerning contracted service. LRTA's contract with MV requires that MV must operate Road Runner paratransit in compliance with DOT's ADA regulations. LRTA management has not made sufficient efforts to monitor MV's operation to ensure compliance with DOT regulations. The review team could not confirm that LRTA management has sufficient understanding of ADA paratransit requirements to monitor the contractor.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must develop procedures to measure and monitor Lowell Transit Management Corporation (MV)'s operation of Road Runner ADA paratransit service. LRTA must develop performance standards, objectives, and goals for service, including but not limited to monitoring telephone service, trip denials, on-time performance, and staff training. LRTA must amend and enhance its policies to inform the procedures and practices of Lowell Transit Management Corporation (MV).

6.13 Service Provided by Another Public Entity (if applicable)

Requirement: Part 37 of title 49, Code of Federal Regulations, applies to any public entity that provides designated public transportation or intercity or commuter rail transportation. Under 49 CFR 37.21(b), for entities receiving Federal financial assistance from the Department of Transportation, compliance with the applicable requirements of Part 37 is a condition of section 504 of the Rehabilitation Act of 1973 and of receiving financial assistance. Where a transit agency relies on another public entity to provide paratransit service on its behalf, the transit agency remains responsible for meeting the requirements of 49 CFR Part 37. In other words, the transit agency must ensure that the service provided on its behalf meet all of the requirements that the transit agency would be required to meet, if the transit agency provided the service directly. The transit agency must have policies and procedures in place to monitor the performance of such service to ensure that these requirements are met; the transit agency is not permitted to defer to the public entity operating the service.

Discussion: No other public entities provide service on behalf of LRTA's ADA complementary paratransit service.

Corrective Action Schedule: Not applicable.

6.14 Coordination of Service

Requirement: Under 49 CFR 37.139(g), public transit operators were required to address efforts to coordinate service with other fixed route operators with overlapping or contiguous service areas or jurisdictions when developing their complementary paratransit plans. Coordination is an ongoing process; while these efforts are likely to have evolved over time, it is expected that such transit systems will have a mechanism in place to ensure that paratransit riders have an ability to make interjurisdictional trips on a comparable basis to individuals using the fixed-route system.

Discussion: During this compliance review, no deficiencies were found with regard to LRTA's efforts to coordinate service with other fixed route operators with overlapping or contiguous service areas or jurisdictions. LRTA coordinates with Councils on Aging, within the region, to supplement transportation services for older adults. LRTA also provides fleet maintenance services for buses belonging to the Councils on Aging. LRTA also LRTA staff explained that Road Runner service does, when necessary, transports its eligible riders to and across its jurisdictional boundaries, to coordinate with transit systems serving neighboring jurisdictions.

LRTA fixed route bus provides several connections to MBTA and therefore, Road Runner ADA service does, too. These are:

- At the Kennedy Center/Gallagher Terminal in downtown Lowell (MBTA commuter rail)—several bus routes meet there.
- LRTA Rt. 13 serves the MBTA Lowell Line at the North Billerica station
- LRTA Rt. 12 serves the MBTA Lowell Line at the Wilmington station
- LRTA Rt. 14 serves the Burlington Mall and Lahey Clinic, where passengers can catch MBTA bus route 350, as well as Town of Burlington Public Transit, a local bus service
- LRTA Rt. 13 goes to Chestnut St. in Burlington, where passengers can catch MBTA bus route 350, as well as Town of Burlington Public Transit, a local bus service

The review team did not find any data regarding how many Road Runner patrons actually connect with MBTA.

Corrective Action Schedule: None required.

Summary Table of Compliance Review Findings

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding D=deficiency ND=no deficiency AC=advisory comment	Finding(s) of Deficiency	Response Days/Date
1	Comparable paratransit service	37.121	ND		
2	Absence of administrative burden	37.125 & 37.5	AC	Clarify position on photo requirements. Provide accessible route to photo processing facility.	
3	Paratransit eligibility standards	37.123 (e)(1)-(3)	D	<p>LRTA has not established written standards, policies, and procedures for the processing, review, documentation, and reporting of eligibility applications.</p> <p>Eligibility determinations did not always reflect sufficient accuracy or appropriateness.</p> <p>Reasons for denying eligibility are potentially inappropriate.</p>	Within 60 days of the issuance of the final report.
4	Accessible information	37.125(b)	D	LRTA communicates the availability of materials in certain accessible formats, however, often times does not follow through.	Within 60 days of the issuance of the final report

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding D=deficiency ND=no deficiency AC=advisory comment	Finding(s) of Deficiency	Response Days/Date
5	Eligibility determinations within 21 days	37.125(c)	D	LRTA does not communicate to applicants their rights to service, if determination is not made within 21 days.	Within 60 days of the issuance of the final report
6	Written eligibility determinations including specific reasons for denials or temporary or conditional	37.125(d)(e)	D	LRTA letters of determination do not always include, in the written notices of eligibility determination, all of the required information elements. LRTA letters of determination do not clearly differentiate Conditional and Temporary Eligibility	Within 60 days of the issuance of the final report
7	Recertification of eligibility at reasonable intervals	35.125(f)	D	LRTA written policy states LRTA will require recertification every five years, however, the determination letter for unconditional eligibility states certification is valid for three years. LRTA must establish an appropriate and reasonable interval for recertification.	Within 60 days of the issuance of the final report

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding D=deficiency ND=no deficiency AC=advisory comment	Finding(s) of Deficiency	Response Days/Date
8	Administrative appeals process for denials and conditional eligibility	37.125(g)	D	LRTA’s appeal process improperly requires applicants to document the basis for their appeal. LRTA Appeal Process document does not contain contact information. LRTA appeal process policy does not consider separation of duties, in composition of the appeal board. The LRTA printed Appeal Process document, provided to applicants denied eligibility, does not reflect the information provided in LRTA written policy and public information materials, regarding the LRTA appeals process.	Within 60 days of the issuance of the final report
9	Complementary paratransit for visitors	37.127	D	LRTA written policy inaccurately states that visitors will remain eligible to use LRTA ADA paratransit services for 21 days, from the date of their first ride.	Within 60 days of the issuance of the final report

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding D=deficiency ND=no deficiency AC=advisory comment	Finding(s) of Deficiency	Response Days/Date
10	Types of service	37.129	AC	LRTA staff states curb-to-curb service, with door-to-door service, upon request, is provided. LRTA web on different pages states “origin to destination” and “door to door” service. The brochure given to riders/applicants does not include any information regarding origin to destination service. LRTA should ensure that accurate and consistent information about its types of service is provided to eligible riders and applicants.	
11	Service area	37.131(a)	ND		
12	Response time	37.131(b)	D	LRTA’s reservations process only accounts for appointment (arrival) times; pickup times are not considered or negotiated.	Within 60 days of the issuance of the final report
13	Fares	37.131(c)	ND		

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding D=deficiency ND=no deficiency AC=advisory comment	Finding(s) of Deficiency	Response Days/Date
14	No trip purpose restrictions	37.131(d)	ND		
15	Hours and days of service	37.131(e)	ND		
16	Absence of capacity constraints	37.131(f)	D	<p>LRTA lacks operational policies, procedures, and service standards to identify, document, manage, and report on capacity denials, missed trips, late pickups or drop-offs, or overly long trips.</p> <p>Data derived from independent analysis, by the review team, suggests the presence of practices, policies, or procedures that significantly limit service availability.</p>	Within 60 days of the issuance of the final report
17	No restrictions on the number of trips provided to an individual	37.131(f)(1)	ND		
18	No waiting list for access to the service	37.131(f)(2)	ND		

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding D=deficiency ND=no deficiency AC=advisory comment	Finding(s) of Deficiency	Response Days/Date
19	No substantial numbers of significantly untimely pickups for initial or return trips	37.131(f)(3)(i)(A)	D	LRTA has no performance standards for on-time pickups. LRTA has not established metrics or procedures to sufficiently monitor on-time performance.	Within 60 days of the issuance of the final report
20	No substantial numbers of trip denials or missed trips	37.131(f)(3)(i)(B) 37.131(3)(1)(B)	D AC	LRTA does not have any written performance standards for number of trip denials or missed trips. Survey customers to determine why trips are cancelled at such a high rate.	Within 60 days of the issuance of the final report
21	No substantial numbers of trips with excessive trip lengths	37.131(f)(3)(i)(c)	D	LRTA does not have any written performance standards for trip length. LRTA does not have data or monitoring practices sufficient to identify excessively long trips	Within 60 days of the issuance of the final report

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding D=deficiency ND=no deficiency AC=advisory comment	Finding(s) of Deficiency	Response Days/Date
22	No operational patterns or practices significantly limiting service availability	37.131(f)	D	Road Runner’s phone system does not have the capacity to isolate information on hold times. Calls placed by the review team to the Road Runner phone number resulted in all calls going to voice mail after just under four minutes. All interviewed stakeholders reported having difficulties with Road Runner’s phone system.	Within 60 days of the issuance of the final report
23	Subscription Service	37.133	ND		
24	No-show, late cancel and reasonable service suspension & appeal policies	37.125(h) (1)-(3)	D	LRTA written policy and public information materials, regarding cancellations and no-shows, are often contradictory and do not reflect the full requirements. LRTA policy does not distinguish between no-shows within rider’s control and those that are not. LRTA policy does not account for rider’s frequency of use. LRTA does not have reliable data identifying no-shows.	Within 60 days of the issuance of the final report

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding D=deficiency ND=no deficiency AC=advisory comment	Finding(s) of Deficiency	Response Days/Date
25	Complaint Resolution & Compliance Information	27.13(b) & 27.121	D	LRTA does not properly track and resolve Road Runner complaints. LRTA does not properly document and maintain all Road Runner complaint records. LRTA does not have a document retention policy for Road Runner complaints. Public information materials do not clearly identify a designated employee responsible for ADA compliance.	Within 60 days of the issuance of the final report
26	Non-discrimination	37.5	ND		
27	Training	37.173	D	LRTA must have documented policies and procedures to ensure consistent and thorough training of staff and drivers. LRTA must ensure that staff and drivers are trained to proficiency.	Within 60 days of the issuance of the final report

Item	Requirement of 49 CFR Part 27 or 37 or 38	Reference	Site Visit Finding D=deficiency ND=no deficiency AC=advisory comment	Finding(s) of Deficiency	Response Days/Date
28	Service under Contract	37.23	D	LRTA management have not sufficiently monitored contractors compliance.	Within 60 days of the issuance of the final report
29	Service provided by another public entity	37.21(b)	N/A		
30	Coordination of service	37.139(g)	ND		

Attachments

- A. FTA Notification Letter to Lowell Regional Transit Authority
- B. LRTA Response to Draft Report
- C. Cancellations and No Show Policy
- D. Stakeholder Interview Questions
- E. Sample Temporary/Conditional Eligibility Determination Letter
- F. Sample Unconditional Eligibility Determination Letter
- G. Sample Eligibility Denial Letter
- H. Appeal Process
- I. LRTA Road Runner On-Time Performance
- J. Road Runner Trips vs. Fixed Route Bus

Attachment A: FTA Notification Letter to Lowell Regional Transit Authority



U.S. Department
Of Transportation
**Federal Transit
Administration**

Headquarters

East Building, 5th Floor, TCR
1200 New Jersey Ave., SE
Washington, D.C. 20590

July 31, 2015

Mr. James H. Scanlan
Administrator
Lowell Regional Transit Authority
145 Thorndike Street
Lowell, MA 01852

Dear Mr. Scanlan:

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, 38 and 39 as they apply to public transportation. As part of its ongoing oversight efforts, FTA through its Office of Civil Rights conducts a number of on-site ADA compliance reviews of grant recipients. Lowell Regional Transit Authority (LRTA) has been selected for a review of its Roadrunner ADA paratransit service to take place during the week of October 19 - 22, 2015.

The purpose of this review will be to determine whether LRTA is meeting its obligations to provide paratransit service as a complement to its fixed route bus service in accordance with the service criteria and eligibility requirements contained in Subpart F of 49 CFR Part 37, and other related requirements contained in 49 CFR Parts 27, 37 and 38.

The review process includes data collection prior to the site visit, an opening conference, an on-site analysis of the Roadrunner 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 the Meeting the Challenge, Inc. (MTC) of Colorado Springs, CO to conduct this compliance review. The MTC team and FTA representatives will participate in the opening and exit conferences, with FTA participating by telephone.

We request an opening conference at **9 a.m. on Monday, October 19, 2015**, to introduce the MTC team and FTA representatives to LRTA, including you or your designee, the LRTA Deputy Administrator, the ADA coordinator, the paratransit general manager, representative(s) of MV Transportation (paratransit contractor), and other key staff. During the opening conference, the review team members will present an overview of the on-site activities.

Because review team members will spend considerable time on site during the week, please provide them with temporary identification and a workspace within or near the Roadrunner ADA offices for the duration of their visit. Please let us know if you will designate a member of your staff to serve as LRTA's liaison with the review team and will coordinate the site visit and address questions that may arise during the visit.

So that we may properly prepare for the site visit, we request that you provide the information described 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:

Geoff Ames
Meeting the Challenge, Inc.
3630 Sinton Road, Suite 103
Colorado Springs, Co 80907
719.433.7640
games@mtc-inc.com

Enclosure 2 consists of items that the MTC team will review on-site beginning on October 19, 2015 after the opening conference.

We request the exit conference be scheduled for **3 p.m. on Thursday, October 22, 2015**, to afford an opportunity for the reviewers to discuss their observations with you and your agency. We request that you or your designee, the LRTA director of paratransit, the ADA coordinator, and other key staff attend the exit conference. The FTA Office of Civil Rights will make findings and will provide them to you in a draft report. You will have an opportunity to correct any factual errors before FTA finalizes the report. The Draft and Final Reports, when issued to LRTA, will be considered public documents subject to release under the Freedom of Information Act, upon request.

LRTA and Roadrunner ADA representatives are welcome to accompany the review team during the on-site activities, if you so choose. If you have any questions or concerns prior to the opening conference, please contact Anita Heard, Program Manager for this compliance review, at 202-493-0318 or at her e-mail address: anita.heard@dot.gov

Thank you in advance for your assistance and cooperation as we undertake this process. We look forward to working with LRTA and Roadrunner ADA staff.

Sincerely,



John Day
ADA Team Leader

cc: Mary Beth Mello, FTA Region I Administrator
Peggy Griffin, FTA Region I Civil Rights Office
Dave Bradley, LRTA Deputy Administrator

Enclosure 1

The following information must be submitted to MTC within 21 calendar days from the date of this letter.

1. A description of how complementary paratransit service is structured and provided, including:
 - How trip requests/reservations are handled (by contractors?) and the address(es) where reservations are taken
 - How trips are scheduled (by contractors?) and the address(es) where scheduling is done
 - How dispatching is handled (by contractors?) and the address(es) of the central dispatch offices

Note that MTC may contact you in advance to discuss this first question.

2. A copy any current operator contracts and any joint operating agreements for complementary paratransit with other public entities
3. A copy of the complementary paratransit operator manual, and copies of all rider guides, service brochures, or other documents that explain to the public and eligible riders how trips are requested and how service is provided
4. A description of the complementary paratransit service standards, including:
 - How is “on-time” performance defined and what is the goal for the percentage of trips to be provided within the standards?
 - What standards have been set regarding acceptable numbers or percentages of ADA trip denials?
 - What travel time is considered comparable to fixed route and what travel time is considered too long? What are the goals for the percentages of trips to be provided within the standards?
5. Telephone call-handling performance standards for calls to reservation and dispatch: What are the standards for hold time (and/or call pickup) and abandoned calls? What are the goals for the percentages of calls to be handled within these standards?
6. Samples of driver manifests (described in Item #1 of Enclosure 2) and samples of records, reports, or tabulations of the complementary paratransit information (described in Item #2 of Enclosure 2)
7. Capital and operating budget and expenditures for complementary paratransit service for the four most recent fiscal years, including the current fiscal year
8. The number of complementary paratransit trips scheduled and provided, and trips denied for the four most recent fiscal years, including the current fiscal year
9. Three copies of the fixed route system map

Enclosure 2

We request that the following information and/or assistance be available at the **beginning of the on-site visit**:

1. Copies of completed driver manifests for the most recent six-month period
2. The following complementary paratransit data, by month, for the last six months (paper copies as well as in electronic format, if available):
 - Trips requested
 - Trips scheduled
 - Trips denied
 - Canceled trips
 - Passenger no-shows
 - Carrier missed trips
 - Trips provided
 - An itemization of trips requested, scheduled, and provided
 - A listing of trips denied each month showing customer's name, origin, requested destination, day and time, and if the person was ambulatory or used a wheelchair
 - On-time performance information
 - A listing of trips longer than 60 minutes showing the customer name, origin, destination, day and time, if the customer was ambulatory or used a wheelchair, and the total time on-board
 - A listing of passenger no-shows and carrier missed trips for last month with negotiated pickup times and actual vehicle arrival and departure times
 - Telephone call management records (if available) showing hold times by hourly or half-hourly periods and day, total call volume, calls answered and abandoned
3. A list of complaints from the past year related to the ADA paratransit eligibility process, provision of complementary paratransit service or other complaints of discrimination. Provision of service complaints should include all complaints related to trip denials, missed trips, wait lists, trip caps, trip restrictions or limits, on-time performance, lengthy trips, phone capacity issues, etc. showing the customer's name, trip origin, date and type of complaint, and transit agency resolution (any corrective actions requested and taken)
4. The following ADA paratransit eligibility information:
 - Copy of a blank application form
 - Copies of eligibility guidelines and policies and any assessment or interview forms
 - Sample letters of all types of determination (unconditional, conditional, temporary, trip eligible (if applicable) and
 - Other letters related to receipt of applications, incomplete applications, eligibility appeals and other eligibility issues
 - Total number of ADA paratransit eligible individuals
 - Access to eligibility files and appeals records

Lowell Regional Transit Authority: Complementary Paratransit Compliance Review

- For the most recent 12 months:
 - Number of applications received
 - Number of completed applications considered and processed
 - Number of applications determined incomplete
 - Number of people determined unconditional eligible
 - Number of people determined conditionally eligible
 - Number of people determined temporarily eligible
 - Number of people determined ineligible
- 5. Any documentation, policies, procedures and correspondence related to service suspensions for missing scheduled trips (i.e., passenger no-shows and/or late cancellations)
- 6. Work shift assignments for reservationists (call-takers), schedulers, dispatchers, and drivers
- 7. Access to personnel records showing hire and termination dates for reservationists (call-takers), schedulers, dispatchers, drivers, and road supervisors
- 8. Current complementary paratransit fleet roster with vehicle type, make and model year and odometer reading, (designating whether the vehicles are accessible or inaccessible), numbers of accessible and inaccessible spares. For each accessible vehicle, please include the design load of the lift or ramp
- 9. Run structure (vehicles in service by hour of day)
- 10. Access to the most recent six months of daily vehicle pullout records showing late pullouts and closed runs
- 11. Vehicle availability reports for most recent six months
- 12. Copies of pre-trip vehicle inspection and preventative maintenance form(s)
- 13. Assistance with viewing and capturing parameters used in the scheduling software
- 14. Assistance with viewing and collecting data on vehicle run structures and peak pullout requirements
- 15. Subscription trips by hour
- 16. Training curricula for each type of complementary paratransit employee
- 17. Procedures for providing information and communication in accessible formats

Attachment B: LRTA Response to Draft Report

From: Jim Scanlan [<mailto:JHS1251@AOL.com>]
Sent: Friday, May 06, 2016 12:33 PM
To: Heard, Anita (FTA)
Cc: D.Bradley@LRTA.com; l.mitchell@lrta.com; Chris Curry
Subject: ADA paratransit response/ LRTA

Anita:

Thank you for the extra time to review the draft report and provide comments. To that end , we have attached a follow up to some of the issues outlined in the report. After review we concur with the factual information in the report and our response address corrective steps to these issues. Additionally, we will address remaining items after we receive the final report.

Again thanks and look forward to successfully concluding the FTA's compliance review of the LRTA 's ADA service.

Jim Scanlan
LRTA Administrator

FTA ADA PARATRANSIT COMPLIANCE REVIEW: LRTA LOWELL TRANSIT RESPONSES AND A CORRECTIVE ACTIONS

6.6 Absence of Capacity Constraints

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must establish standards that clearly define and ensure timely pickups. LRTA must implement metrics, accurate reporting of data, and tracking procedures sufficient to facilitate ongoing monitoring of on-time performance.

Page | 1

Action taken:

1. On Time Performance report has been established. A screen shot of OTP is attached; Attachment A. Page 1 of OTP is attached, Attachment B.
2. Performance Measure Report is attached. Report reflects goal of 90 percent OTP. Attachment C.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must develop and implement operational policies, procedures, and service standards to identify, document, manage, and report on capacity denials, missed trips, late pickups or drop-offs, or overly long trips.

Action taken:

1. **A Standard Operational Procedure manual** has been drafted and awaits approval by LRTA. Written in December 2015, and has since had additional information added. Attachment X.
2. **Denial Report** is attached. Attachment D.
3. **Missed Trips, late pickup and drop-offs** are reported in the **On time Performance Report**. Screen shot of the report parameters is attached; Attachment A. Page 1 of On Time Performance Report is attached; Attachment B.
4. **Ride Time Report** is attached. Screen shot of the report parameters is attached; Attachment F. Page 1 of a Ride Time Report is attached; Attachment G.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must establish standards that clearly define trips denials and missed trips. LRTA must implement metrics, accurate reporting of data, and tracing procedures sufficient to identify and monitor any reservations, dispatch, or driving practices that might result in drip denials or missed trips.

Action taken:

1. Performance measure report is attached. Attachment C.
2. Trip Denial Report is attached. Attachment D.
3. A blank copy of a denial form is attached. Attachment E.
4. Reservations and Dispatch - Software will show when a trip will run late according to scheduling. Denial Report is not complete by HBSS.

FTA ADA PARATRANSIT COMPLIANCE REVIEW: LRTA LOWELL TRANSIT RESPONSES AND A CORRECTIVE ACTIONS

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA must establish standards that clearly define and identify excessively long trips. It is an effective practice to develop and review exception reports, on a monthly or weekly basis, to identify excessively long trips. A

Page | 2

Report listing trips having durations longer than 60 minutes is a useful starting place. Beyond that, understanding the required comparability between fixed route trip times and paratransit trip times is

Essential to isolating the trips that are of truly excessive length. Identifying such trips is a prerequisite to eliminating them.

Action taken:

1. Ride Time Report attached; Attachment G. This report is run every Friday and then monthly for a total. The Standard Operating Procedure defines excessively long trips. See Attachment X.

Corrective Action Schedule: Within 60 days of the issuance of the final report, LRTA, must produce a plan to eliminate excessive hold times for paratransit trip reservations, including metrics for hold times and abandoned calls. It is an effective practice to provide a phone system with discrete lines for making reservations and receiving "Where's my Ride?" calls.

Action taken:

1. Road Runner has increased staffing to include 40 more hours of dispatch.
2. Road Runner is implementing a new phone system which will be installed with metrics to measure hold times, abandoned calls. Estimated date of installation **June 2016**. Lines will be established for "Where's my ride?" calls as well as a line for cancelations.

Corrective Action Schedule: Within 60 days of issuance of the final report, LRTA must develop a no-show policy that accounts for a rider's frequency of trips, quantifies or defines a pattern of practice of missing scheduled trips, includes the duration of suspensions and distinguishes between no-shows that are within the driver's control and those that are not. Alternately, LRTA may elect not to have a no-show policy and refrain from suspending riders on the basis of no-show.

Action taken:

1. No Show Policy is in the drafted SOP. See Attachment X.
2. A report has been generated to determine the rider's frequency of trips and percentage of total trips that are a no-show within a set perimeter. See Attachment H. Report shows what a "cancel on arrival" is and what a "no-show." is Report is titled "Passenger Attendance Report. Report may be run for one passenger or total passengers.

Corrective Action Schedule: Within 60 days of issuance of the final report, LRTA must create and implement an effective policy and procedure to receive and resolve complaints promptly and equitably, and ensure that records are kept as required.

**FTA ADA PARATRANSIT COMPLIANCE REVIEW: LRTA
LOWELL TRANSIT RESPONSES AND A CORRECTIVE ACTIONS**

Action taken:

1. Complaint procedure is in the drafted SOP. See Attachment I.
2. Road Runner has implemented a complaint procedure for all staff to follow. A copy of monthly complaint log is attached. See Attachment J. Also attached is a copy of a blank complaint form. See Attachment K.

Report Parameters

From Date	<input type="text" value="4/27/2016"/>
To Date	<input type="text" value="4/27/2016"/>
Funding Source	<input type="text" value="ALL"/>
Segment	<input type="text" value="ALL"/>
TimeRange From	<input type="text" value="1200A"/>
Min Before Sch. Pickup	<input type="text" value="15"/>
Min Before Sch. DropOff	<input type="text" value="90"/>
Group By	<input type="text" value="Date"/>

Driver	<input type="text" value="ALL"/>
TimeRange To	<input type="text" value="1159P"/>
Min After Sch. Pickup	<input type="text" value="15"/>
Min After Sch. DropOff	<input type="text" value="0"/>
Status	<input type="text" value="ALL"/>

<input type="button" value="Show Report"/>	<input type="button" value="Cancel"/>
--	---------------------------------------

LRTA 145 Thorndike Street, Lowell, MA 01852

On Time Performance Report 04/01/2016-04/26/2016 - Generated on 04/27/2016 07:58

To Date - 04/26/2016 Segment - ALL Driver - ALL Min Before Sch. Pickup - 15 Min After Sch. Pickup - 15 Min Before Sch. DropOff - 90 From Date - 04/01/2016 Min After Sch. DropOff - 0 TimeRange From - 1200A Group By - Date Funding Source - ALL TimeRange To - 1159P Status - ALL

Total Trips: 3993 On Time: (6842/85.67%) Not OnTime: (1136/14.22%) Unknown: (8/0.10%)

TRAVEL DATE	SEGMENT	DRIVER	CLIENT NAME	TRIPID	TRIPSTATUS	PU CITY	DO CITY	PICKUP TIME	ACTUAL PU ARRIVE TIME	APPT TIME	ACTUAL DO ARRIVE TIME	ON TIME	PU VARIANCE (Minutes)	DO VARIANCE (Minutes)
Date- 04/01/2016 Total Trips: 197 On Time:(161/81.73%) Not OnTime:(36/18.27%) Unknown:(0/0.00%)														
04/01/2016	S001	JOHN, GAUTHIER	TAISEER, ALJIBOORY	T1506234	Confirmed	LOWELL	LOWELL	10:15 AM	10:52 AM	11:00 AM	11:27 AM	N	37	27
04/01/2016	S001	JOHN, GAUTHIER	SARAH, COOK	T1505193	Confirmed	LOWELL	LOWELL	12:15 PM	12:35 PM	01:00 PM	12:51 PM	N	20	9
04/01/2016	S001	JOHN, GAUTHIER	ASHLEY, ERCOLANI	T1506173	Confirmed	LOWELL	LOWELL	08:15 AM	08:14 AM	09:00 AM	08:43 AM	Y	1	17
04/01/2016	S001	JOHN, GAUTHIER	MARY, SHORE	T1504918	Confirmed	LOWELL	CHELMSFORD	09:00 AM	08:58 AM	09:45 AM	09:10 AM	Y	2	35
04/01/2016	S001	JOHN, GAUTHIER	NORMAN, CEASE	T1506222	Confirmed	CHELMSFORD	CHELMSFORD	03:30 PM	03:46 PM	00:00 AM	04:12 PM	N	16	0
04/01/2016	S001	JOHN, GAUTHIER	BRENDA, DUPREY	T1506084	Confirmed	DRACUT	LOWELL	07:45 AM	07:59 AM	00:00 AM	08:14 AM	Y	14	0
04/01/2016	S001	JOHN, GAUTHIER	DOROTHY, DONOVAN	T1507287	Confirmed	LOWELL	LOWELL	07:15 AM	07:14 AM	07:45 AM	07:34 AM	Y	1	11
04/01/2016	S001	JOHN, GAUTHIER	JEANNE, WILKINS	T1506148	Confirmed	LOWELL	LOWELL	08:30 AM	08:25 AM	00:00 AM	08:30 AM	Y	5	0
04/01/2016	S001	JOHN, GAUTHIER	ANDREA, SULLIVAN	T1506151	Confirmed	LOWELL	DRACUT	02:00 PM	02:08 PM	00:00 AM	02:54 PM	Y	8	0
04/01/2016	S001	JOHN, GAUTHIER	LOUIS, MARINO	T1506162	Confirmed	CHELMSFORD	CHELMSFORD	03:30 PM	03:46 PM	00:00 AM	03:58 PM	N	16	0
04/01/2016	S001	JOHN, GAUTHIER	MARY, MIGUEL	T1505908	Confirmed	LOWELL	CHELMSFORD	10:45 AM	10:41 AM	11:30 AM	11:06 AM	Y	4	24
04/01/2016	S001	JOHN, GAUTHIER	GAIL, GRIFFIN	T1505938	Confirmed	LOWELL	LOWELL	11:15 AM	11:31 AM	12:00 PM	11:59 AM	N	16	1
04/01/2016	S001	JOHN, GAUTHIER	MARY, WHITNEY	T1506270	Confirmed	LOWELL	WESTFORD	09:30 AM	09:33 AM	10:15 AM	09:58 AM	Y	3	17
04/01/2016	S001	JOHN, GAUTHIER	BRENDA, DUPREY	T1506085	Confirmed	LOWELL	DRACUT	12:00 PM	12:05 PM	00:00 AM	12:18 PM	Y	5	0
04/01/2016	S004	ROUSSELL, DENISE	MARY, SHORE	T1504919	Confirmed	CHELMSFORD	LOWELL	11:00 AM	10:53 AM	00:00 AM	11:03 AM	Y	7	0
04/01/2016	S004	ROUSSELL, DENISE	VERNETTA, ANDERSON	T1505957	Confirmed	LOWELL	LOWELL	01:45 PM	02:16 PM	00:00 AM	02:26 PM	N	31	0
04/01/2016	S004	ROUSSELL, DENISE	MARY, PITMAN	T1506001	Confirmed	LOWELL	LOWELL	09:30 AM	09:15 AM	10:30 AM	09:37 AM	Y	15	53
04/01/2016	S004	ROUSSELL, DENISE	DORIS, PROVENCHER	T1506358	Confirmed	LOWELL	LOWELL	01:45 PM	02:15 PM	00:00 AM	02:31 PM	N	30	0
04/01/2016	S004	ROUSSELL, DENISE	DORIS, PROVENCHER	T1506354	Confirmed	LOWELL	CHELMSFORD	09:00 AM	09:01 AM	00:00 AM	09:07 AM	Y	1	0
04/01/2016	S004	ROUSSELL, DENISE	HELEN, DESROCHE	T1506117	Confirmed	LOWELL	LOWELL	08:00 AM	08:10 AM	00:00 AM	08:16 AM	Y	10	0
04/01/2016	S004	ROUSSELL, DENISE	ALICE, REDMAN	T1505877	Confirmed	LOWELL	LOWELL	08:15 AM	08:06 AM	09:00 AM	08:19 AM	Y	9	41
04/01/2016	S004	ROUSSELL, DENISE	WILLIAM, GALAN	T1506184	Confirmed	LOWELL	LOWELL	10:00 AM	09:48 AM	00:00 AM	09:59 AM	Y	12	0
04/01/2016	S004	ROUSSELL, DENISE	CATHERINE, NIEMI	T1506217	Confirmed	LOWELL	LOWELL	07:45 AM	07:40 AM	08:30 AM	07:56 AM	Y	5	34
04/01/2016	S004	ROUSSELL, DENISE	LISA, GROULX	T1506219	Confirmed	LOWELL	LOWELL	11:30 AM	11:37 AM	12:30 PM	11:55 AM	Y	7	35
04/01/2016	S004	ROUSSELL, DENISE	DEBRA, STOUT	T1506928	Confirmed	LOWELL	DRACUT	10:15 AM	10:07 AM	00:00 AM	10:23 AM	Y	8	0

ATTACHMENT C

PARATRANSIT	ROAD RUNNER PERFORMANCE MEASURES AS OF APRIL 2016					GOAL FY 2016
	Dec-16	Jan-16	Feb-16	Mar-16	Apr-16	
RIDERSHIP						
Total Trips	3802	4268	4377	5047		
Total Vehicle Hours	2473	2066	2648	3364		
Trips per revenue hour	1.54	2.07	1.65	1.65		1.54 Trips Per Revenue Hour or Greater
Total RR Miles	33,772	34,779	35,350	42,291		
SAFETY						
Non-preventible Accidents	4	4	0	0		
Preventible Accidents	0.84	0.87	0.00	0.87		1 Preventible Per 40,000 miles
Worker's Comp Claims per 100 employees	0	0	0	0		
MAINTENANCE						
Preventative Maintenance	100.00%	100.00%	100.00%	100.00%		100.00%
Road Calls	2	3	0	0.00%		
Revenue miles between road calls	16886	11593	35,350	42,291		1 Road Call Per 10,000 Miles
CUSTOMER SATISFACTION						
On-Time	68.00%	75.00%	84.00%	85.00%		90% On Time Performance Goal
Missed Trips	31.00%	22.00%	17.00%	15.00%		
Ride Time Violations				8		
TOTAL CUSTOMERS	437	480	481	488		
TOTAL TRIPS	3802	4268	4377	5047		
Customer Complaints	2	4	6	2		Less than 1 complaint per 1000 trips

•Stranded passengers: 0

Passengers no-shows: MARCH 2016: 199

MARCH 2016 DENIALS

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Monthly Incident Total		
Out of Service Area																																		0
Outside of Operational Hours																																		0
Eligibility Status																																		0
Capacity Constraints/Overbookings																																		0
Capacity Constraints Lack of Drivers																																		0
Adversarial Denials																																		0
																																		0
																																		0
																																		0
																																		0
																																		0
																																		0
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Daily Incident Total:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
TOTAL DENIALS																															0			

LRTA 145 Thorndike Street, Lowell, MA 01852

ADA Denial Report 03/01/2016-03/31/2016 - Generated on 04/27/2016 07:50

To Date - 03/31/2016 ADA Status - ALL From Date - 03/01/2016

TRAVEL DATE	CLIENT NAME	TRIP ID	SO ID	PU ST #	PU ST NAME	PU CITY	PU STATE	DO ST #	DO ST NAME	DO CITY	DO STATE	FUNDING SOURCE	STATUS	ADA STATUS
03/01/2016	ALBERT FLAKE	T1499827		8	SHEILA AVE	CHELMSFORD	MA	228	BILLERICA RD	CHELMSFORD	MA	ADA	NO SHOW	Accepted beyond service
03/01/2016	ALBERT FLAKE	T1499828		228	BILLERICA RD	CHELMSFORD	MA	8	SHEILA AVE	CHELMSFORD	MA	ADA	CANCELLED	Accepted beyond service
03/01/2016	ALYSSA TERNULLO	T1499171	R60782	20	PORTER ROAD	CHELMSFORD	MA	43	HIGHLAND ST	LOWELL	MA	ADA	CANCELLED	Accepted
03/01/2016	ANDREA SULLIVAN	T1499163	R59031	28	BETTY ANN LANE	DRACUT	MA	885	MAIN ST	TEWKSBURY	MA	ADA	CONFIRMED	Accepted
03/01/2016	ANDREA SULLIVAN	T1499164	R59032	295	VARNUM AVENUE	LOWELL	MA	28	BETTY ANN LANE	DRACUT	MA	ADA	CONFIRMED	Accepted
03/01/2016	ANGELA VEZINA	T1498742		100	MASS MILLS DRG9	LOWELL	MA	275	VARNUM AVE	LOWELL	MA	ADA	CANCELLED	Accepted
03/01/2016	ANGELA VEZINA	T1498743		275	VARNUM AVE	LOWELL	MA	100	MASS MILLS DRG9	LOWELL	MA	ADA	CANCELLED	Accepted
03/01/2016	ANGELA WILLIAMS	T1499174	R60988	143	LAKEVIEW AVE	LOWELL	MA	220	MAIN ST	WILMINGTON	MA	ADA	CONFIRMED	Accepted
03/01/2016	ANNA BRODERICK	T1499854		227	GORHAM ST	LOWELL	MA	1	HOSPITAL DRIVE	LOWELL	MA	ADA	CANCELLED	Accepted
03/01/2016	ANNA BRODERICK	T1499855		1	HOSPITAL DRIVE	LOWELL	MA	227	GORHAM ST	LOWELL	MA	ADA	CANCELLED	Accepted
03/01/2016	ANNA CUZZUPE	T1499115	R60996	1	GREEN ST	BILLERICA	MA	325	BOSTON ROAD	BILLERICA	MA	ADA	CONFIRMED	Accepted
03/01/2016	ANNA CUZZUPE	T1499116	R60997	325	BOSTON ROAD	BILLERICA	MA	1	GREEN ST	BILLERICA	MA	ADA	CONFIRMED	Accepted
03/01/2016	ARMAITY PRABHU	T1499586		27	JACKSON STREET	LOWELL	MA	48	CHELMSFORD ST	CHELMSFORD	MA	ADA	CONFIRMED	Accepted
03/01/2016	ARMAITY PRABHU	T1499587		48	CHELMSFORD ST	CHELMSFORD	MA	27	JACKSON STREET	LOWELL	MA	ADA	CONFIRMED	Accepted beyond service
03/01/2016	ASHLEY ERCOLANI	T1499192	R58833	1329	PAWTUCKET BLVD#12	LOWELL	MA	325	CHELMSFORD STREET	LOWELL	MA	ADA	CONFIRMED	Accepted
03/01/2016	ASHLEY ERCOLANI	T1499193	R58834	325	CHELMSFORD STREET	LOWELL	MA	1329	PAWTUCKET BLVD#12	LOWELL	MA	ADA	CONFIRMED	Accepted
03/01/2016	AUDELINA GILLIS	T1499133	R60759	128	LAURIE LANE	LOWELL	MA	176	WALKER STREET	LOWELL	MA	ADA	CONFIRMED	Accepted
03/01/2016	AUDELINA GILLIS	T1499134	R60760	176	WALKER STREET	LOWELL	MA	128	LAURIE LANE	LOWELL	MA	ADA	CONFIRMED	Accepted
03/01/2016	BRANDON BANGURA	T1499141	R60924	18	PLENTY ST	BILLERICA	MA	1	UNIVERSITY DRIVE	LOWELL	MA	ADA	CANCELLED	Accepted

LOWELL TRANSIT MANAGEMENT CORPORATION

DENIAL FORM

ATTACHMENT E

Client Call Time:

Date of Call:

Client Last Name:

Client First Name:

Client Address:

Client Phone Number:

Trip Denial Date:

Trip Denial Time:

Dispatch Name:

Form Submitted By

ADA Client: Yes No

Senior Client: Yes No

Details:

Follow up:

Date sent to GM:

Date sent to LRTA:

LOWELL TRANSIT MANAGEMENT CORPORATION

DENIAL FORM

Client Last Name:

Client First Name:

Trip Denial Date:

Out of Service Area:

Outside of Operational Hours:

Eligibility Status :

Capacity Constraints Overbooking:

Capacity Constraints Lack of Drivers:

Adversarial Denials:

Report Parameters

From Date
To Date
Funding Source
Segment
PU City
In Town Max RideTime .
(Minutes)

Client Name
Dropoff City
Out of Town Max RideTime .
(Minutes)

ATTACHMENT G

LRTA 145 Thorndike Street, Lowell, MA 01852

Ride Time Report 03/01/2016-03/31/2016 - Generated on 04/27/2016 08:07

To Date - 03/31/2016 Segment - ALL Funding Source - ALL Client Name - ALL From Date - 03/01/2016 PU City - ALL Dropoff City - ALL In Town Max RideTime - 60 Out of Town Max RideTime - 90

TRAVEL DATE	FUNDING SOURCE	SEGMENT	LAST NAME	FIRST NAME	TRIP ID	PU ST #	PU ST NAME	PU CITY	PU STATE	PU ZIP	DO ST #	DO ST NAME	DO CITY	DO STATE	DO ZIP	ESTIMATED DISTANCE	ESTIMATED TRAVEL TIME	ACTUAL TRAVEL TIME
03/03/2016	DIAL A RIDE	S061	RODERICK	MARY	T1498935	17	BLACKWOOD AVENUE	BILLERICA	MA	01821	265	BOSTON ROAD	BILLERICA	MA	01832	3	12.30000019	64
03/04/2016	ADA ALL	S001	ERCOLANI	ASHLEY	T1500088	1329	PAWTUCKET BLVD	LOWELL	MA	01854	325	CHELMSFORD STREET	LOWELL	MA	01852	3.75	14	61
03/09/2016	ADA ALL	S052	MCQUAID	PAUL	T1501070	22	BOWERS ST	LOWELL	MA	01852	200	SPRINGS ROAD	BEDFORD	MA	01730	11.43000031	19.78000069	102
03/09/2016	DIAL A RIDE	S052	ROUILLARD	MARY	T1500799	41	MALL ROAD	BURLINGTON	MA	01821	14	ELLIS AVE	TEWKSBURY	MA	01878	12	37.95000076	119
03/23/2016	DIAL A RIDE	S052	DESROCHES	JEANNETTE	T1504087	276	BROADWAY ST	LOWELL	MA	01852	33	MUNROE ST	LOWELL	MA	01850	1.730000019	4	68
03/23/2016	ADA ALL	S001	PICANSO	JEREMY	T1504136	288	CHELMSFORD ST	CHELMSFORD	MA	01824	464	MAMMOTH ROAD	DRACUT	MA	01826	4	10.89999981	96
03/25/2016	ADA ALL	S001	GROULX	LISA	T1505874	22	OLDE CANAL DR	LOWELL	MA	01851	316	ROGERS ST	LOWELL	MA	01852	3.890000105	18.04999924	63
03/28/2016	ADA ALL	S062	KESSLER	MABLE	T1504733	480	BOSTON ROAD	BILLERICA	MA	01862	476	BOSTON RD	BILLERICA	MA	01821	0.059999999	0.150000006	74

8

Passenger Attendance Report 03/01/2016-03/31/2016 - Generated on 04/28/2016 08:18

Client Name - ALL From Date - 03/01/2016 To Date - 03/31/2016 Funding Source - ALL Trip Status - ALL Min Sub-Total(%) 0

TRAVEL DATE	FUNDING SOURCE	SEGMENT	CLIENT NAME	CLIENT ID	P.U. TIME	APPT. TIME	P.U. ADDRESS	D.O. ADDRESS	CONFIRMED	CANCELLED	NO-SHOW	CANCELLATION	
Grand Total For:									Total Trips Scheduled: 7212	(5047/69.98%)	(1941/26.91%)	(199/2.76%)	(25/0)

DA Total Trips Scheduled: 4430

BDALKADIR, ALI Total Trips Scheduled: 8

03/10/2016	ADA	S051	ABDALKADIR, ALI	C89011	11:00 AM	00:00 AM	408,MERRIMACK STREET , LOWELL, MA 01854	591,SPRINGS RD , BEDFORD, MA 01730	1	0	0		
03/10/2016	ADA	S061	ABDALKADIR, ALI	C89011	08:20 AM	00:00 AM	591,SPRINGS RD , BEDFORD, MA 01730	408,MERRIMACK STREET , LOWELL, MA 01854	1	0	0		
03/17/2016	ADA		ABDALKADIR, ALI	C89011	08:00 AM	00:00 AM	590,SPRINGS ROAD , BEDFORD, MA 01730	408,MERRIMACK STREET , LOWELL, MA 01854	0	0	1		
03/17/2016	ADA	S012	ABDALKADIR, ALI	C89011	11:00 AM	00:00 AM	408,MERRIMACK STREET , LOWELL, MA 01854	590,SPRINGS ROAD , BEDFORD, MA 01730	1	0	0		
03/24/2016	ADA		ABDALKADIR, ALI	C89011	08:00 AM	00:00 AM	590,SPRINGS ROAD , BEDFORD, MA 01730	408,MERRIMACK STREET , LOWELL, MA 01854	0	1	0		
03/24/2016	ADA		ABDALKADIR, ALI	C89011	11:00 AM	00:00 AM	408,MERRIMACK STREET , LOWELL, MA 01854	590,SPRINGS ROAD , BEDFORD, MA 01730	0	1	0		
03/31/2016	ADA		ABDALKADIR, ALI	C89011	08:00 AM	00:00 AM	590,SPRINGS ROAD , BEDFORD, MA 01730	408,MERRIMACK STREET , LOWELL, MA 01854	0	0	1		
03/31/2016	ADA		ABDALKADIR, ALI	C89011	11:15 AM	00:00 AM	408,MERRIMACK STREET , LOWELL, MA 01854	590,SPRINGS ROAD , BEDFORD, MA 01730	0	1	0		
Sub Total For:									ABDALKADIR, ALI	(3/37.50%)	(3/37.50%)	(2/25.00%)	(0/0)

BRAHAM, JACOB Total Trips Scheduled: 4

03/11/2016	ADA		ABRAHAM, JACOB	C79901	03:00 PM	00:00 AM	99,CHURCH ST , LOWELL, MA	55,MARLBOROUGH ST , LOWELL, MA 01851	0	1	0		
03/11/2016	ADA	S043	ABRAHAM, JACOB	C79901	01:15 PM	02:00 PM	55,MARLBOROUGH ST , LOWELL, MA 01851	99,CHURCH ST , LOWELL, MA	1	0	0		
03/25/2016	ADA		ABRAHAM, JACOB	C79901	01:00 PM	02:00 PM	55,MARLBOROUGH ST , LOWELL, MA 01851	99,CHURCH ST , LOWELL, MA	0	1	0		
03/25/2016	ADA		ABRAHAM, JACOB	C79901	03:15 PM	00:00 AM	99,CHURCH ST , LOWELL, MA	55,MARLBOROUGH ST , LOWELL, MA 01851	0	1	0		
Sub Total For:									ABRAHAM, JACOB	(1/25.00%)	(3/75.00%)	(0/0.00%)	(0/0)

CHIN, HENRY Total Trips Scheduled: 6

LOWELL TRANSIT MANAGEMENT CORPORATION

COMPLAINT FORM

ATTACHMENT J

Time of Complaint: _____

Date of Complaint: _____

Client Last Name: _____

Client First Name: _____

Client Address: _____

Client Phone Number: _____

Date of Incident: _____

Time of Incident: _____

Driver on Pickup: _____

Driver on Return: _____

Complaint Filed By: _____

Trip ID: _____

ADA Client: Yes No

Senior Client: Yes No

Details:

Resolution:

Date sent to GM: _____

Date sent to LRTA: _____

LOWELL TRANSIT MANAGEMENT CORPORATION

COMPLAINT FORM

Client Last Name: 0

Client First Name: 0

Date of Incident: 1/0/1900

Trip ID: 0

Bad/Unsafe Driving:

Customer Service/Rudeness:

Missed Trip:

No Show:

Late Trip:

Early Trip:

Excessively Long Onboard Time:

Bus Comfort:

Passenger Incidents:

Fare Issue:

Schedule:

Mechanical:

Standed Client:

Commendation:

Suggestion(s):

Other:



Eligibility

In compliance with the Americans with Disabilities Act (ADA), the Lowell Regional Transit Authority provides origin to destination transportation services for individuals who, because of their disability, are unable to travel on the fixed route mass transit system operated by the LRTA. This service is designed to provide those with disabilities equal access to public transportation. You may be eligible for this service if:

- You are unable to board, ride or exit from an LRTA fixed route bus, or
- You are unable to get to or from a bus stop

To use the ADA service, you must be certified as eligible.

Follow these easy steps to receive your certification application:

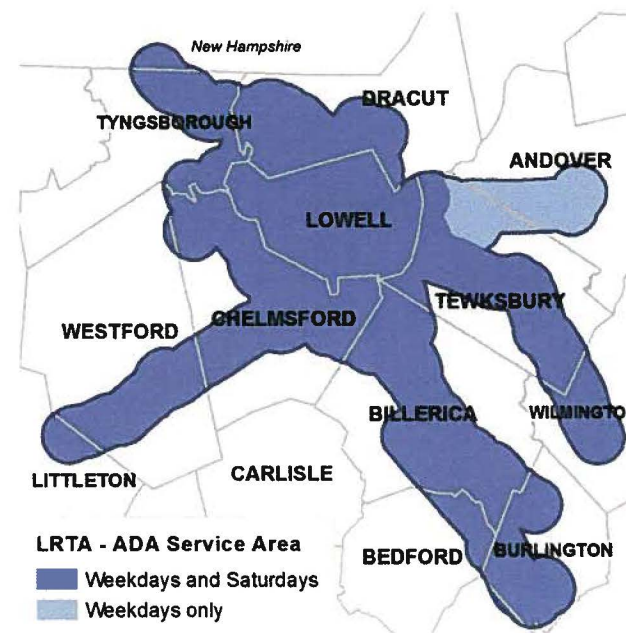
1. Request an application from the Lowell Regional Transit Authority by email TransportationAccess@LRTA.com; phone 978-459-0152; or by writing:

ADA Applications
 Lowell Regional Transit Authority
 Road Runner
 113 Thorndike Street
 Lowell, MA 01852

2. When you receive the application, it is important that you complete the entire form so we can provide you with the best possible service. Mail the completed form to the LRTA at the address above and we will review it to determine your eligibility.

3. Your eligibility certification will be based on ADA eligibility guidelines. If approved, you will be ready to use the service. Additionally, you will be eligible for a photo ID Charlie Card from the Road Runner office (listed above). The photo ID (Transportation Access Pass) TAP Charlie Card entitles the holder to ride the Fixed Route Bus System at a 50% discount.

ADA Service Area



Appeals Process

Many applicants are not eligible for ADA service. If it is determined that you are not eligible, you will receive a letter along with information on how you may appeal the decision.

Days and Hours of Service

The service operates 6 days a week during the same hours that LRTA fixed route buses operate. While there are some exceptions, the service is generally open from 6:00 a.m. to 8:30 p.m. weekdays, and 8:00 a.m. to 6:30 p.m. on Saturdays.

Service Area

The ADA service area covers 3/4 of a mile around all LRTA bus routes. This includes Lowell, Billerica, Chelmsford, Dracut, Tewksbury, Tyngsborough and Westford. If you have a question about whether or not your trip is in our service area, please call our reservation office at 978-459-0152.

Fares

The fare is \$1.00 in-town and \$1.50 out-of-town for each one-way trip. There are no discounts available for elderly or disabled persons. All fares must be paid at the time of boarding.

Holiday Schedules

LRTA bus service including ADA service is unavailable on the following holidays:

New Years Day, Memorial Day, Independence Day, Labor Day, Thanksgiving, Christmas.

Personal Care Attendants

If you are an ADA rider and will be traveling with a personal care attendant or aid, please let us know when you reserve a ride. There is no fare for a personal care attendant. They must be picked up and dropped off at the same location as you and must be capable of providing any assistance you require. Companions may accompany ADA riders but must pay the appropriate fare.

Questions, Comments, Complaints

How are we doing? We would like to know what you think about our service. Questions, comments or complaints may be sent to the address below or you can call our administrative office at 978-459-0152. In addition, surveys are available on board all of our buses. Please take a moment to let us know what you think.

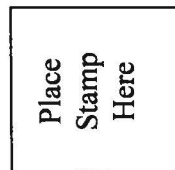
Customer Service
Lowell Regional Transit Authority
Road Runner
145 Thorndike Street
Lowell, MA 01852

Important Numbers

- For reservations and cancellations call: 978-459-0152. (Sorry, no same day trips)
- Administration - If you have a complaint, questions or need application materials call: 978-459-0164.

Alternative Formats

All materials produced by the LRTA are available in alternative formats. For more information please call 978-459-0164



Lowell Regional Transit Authority
Gallagher Intermodal Center
145 Thorndike Street
Lowell, MA 01852

Road Runner

Americans with Disabilities Act

ADA Dial-A-Ride Transportation Service



Lowell Regional Transit Authority

Attachment C: Cancellations and No Show Policy

Cancellations and No Show Policy

If you need to cancel your trip, please notify Road Runner as soon as possible, an hour minimum is requested.

LRTA will employ an administrative process regarding such suspensions for persons with a pattern or practice of missing scheduled trips. The following steps are included:

- a. LRTA will notify the individual that a suspension of service is proposed. The notification will include the specific basis for the proposed suspension and the proposed penalty (period of suspension),
- b. The individual and/or his representative will be provided an opportunity to be heard and present information and arguments; this hearing will be chaired by the General Manager.
- c. LRTA will notify the individual in writing of the decision and the reasons for it,

LRTA will maintain an appeals process through which individuals faced with suspension of service can obtain review of the suspension (Section 37.125):

– Appeals must be filed within 60 days of the notice of suspension,

– *Appeals must be submitted to the Transit Administrator.*

- c. LRTA will present the individual and/or his or her representative an opportunity to be heard to present information and arguments.
- d. Based on the information available, a decision will be made by the Transit Administrator. The individual will be provided with written notification of the decision and the reasons for it.
- e. LRTA is not required to provide ADA paratransit service pending determination. However, if a decision has not been made within 30 days of completion of the appeal process, service must be provided from that time unless the appeal is denied.

Attachment D: Stakeholder Interview Questions

Attachment D

Questions for LRTA/Road Runner Paratransit Riders Interviews

Explain the purpose of the call, identify yourself as a contractor for FTA, and assure them that the interview is confidential.

Generally we want to know about:

1. **Eligibility:** Do you think the Road Runner eligibility process is fair? Is the process understandable? In re-certification requires? If so, how often?
2. **Telephone hold times and access to reservations:** How often do you have to hold when you call to make a reservation for a trip? How long do you typically have to hold when you're making a reservation?
3. **Trip denials:** Have you been denied any trips because there was not a ride available at the time you wanted to travel? Did reservationist allow you to negotiate for another time?
4. **On-time performance:** Does Road Runner arrive to pick you up during the scheduled *window*? [always/most of the time/seldom/never]
5. **Missed trips:** Has Road Runner ever missed picking you up for a scheduled ride? Have you ever missed a trip that you scheduled with Roadrunner? If so, were you subjected to negative consequences, such as having you service suspended?
6. **Trip length:** How long is your typical trip on Road Runner? Does this seem to be too long for the distance you're traveling?

Attachment E: Sample Temporary/Conditional Eligibility Determination Letter



Attachment E

**DETERMINATION LETTER –
TEMPORARY/CONDITIONAL ELIGIBILITY**

DATE

NAME
ADDRESS
CITY, STATE ZIP

Dear _____

Based upon a review of your application for certification of ADA paratransit eligibility, the Lowell Regional Transit Authority has determined that you are eligible for ADA paratransit service when one or more of the following qualifications exist:

- (1)
- (2)

The above stipulations may be used by the Lowell Regional Transit Authority to determine if and when you may be able to use the regular bus/rail service. If you can use these services, federal law does not require that paratransit service be provided. You are encouraged to use the regular bus/rail service whenever possible. If you need assistance utilizing the LRTA fixed route bus system please contact our fixed route bus dispatch at 978-452-6161, ext 238. Additionally, please keep in mind that we transport people who live within our service area and to destinations within our service area. Service area is defined as the area within $\frac{3}{4}$ of a mile of LRTA fixed bus routes and all pick-up and drop-off locations must be within that boundary.

If you do not agree with the limitations that have been placed on your eligibility, you have the right to appeal this determination. Any request for an appeal must be made in writing and must be mailed within 60 days of the date of this letter. The enclosed description of the appeal policy provides additional information about the process.

This certification of eligibility is valid until _____. You will automatically receive a recertification form in the mail so that you can reapply at that time. Please note that you may also reapply at any time if you feel that changes in your ability to use the regular bus/rail service could affect this determination.

If you have any questions about the service, or need any other assistance, please feel free to call the LRTA Road Runner office at (978) 459-0152.

Sincerely,

Para-Transit Liaison

Enclosures: Description of appeal policy
ADA paratransit information

Attachment F: Sample Unconditional Eligibility Determination Letter

Attachment F



DETERMINATION LETTER – UNCONDITIONAL ELIGIBILITY

DATE

NAME

ADDRESS

CITY, STATE, ZIP

Dear _____

Based upon a review of your application for certification of ADA paratransit eligibility, The Lowell Regional Transit Authority has determined that you are eligible for ADA Paratransit service within our ADA service area. Please keep in mind the ADA Service area is defined as the area within $\frac{3}{4}$ of a mile of LRTA fixed bus routes and all pick-up and drop-off locations must be within that boundary.

This certification of eligibility is valid for 3 years. You will automatically be contacted around that time so that you may reapply.

Also attached is material which provides important information about the LRTA's ADA Road Runner complementary paratransit service. Please read carefully.

If you have any questions about the service, or need any other assistance, please feel free to call the LRTA Road Runner office at (978)459-0152.

Sincerely,

Para-Transit Liaison

Enclosure: ADA Paratransit Information

Attachment G: Sample Eligibility Denial Letter

Attachment G



DETERMINATION LETTER – INELIGIBLE

NAME:
ADDRESS:
CITY, STATE, ZIP:

DATE:

Dear _____

Based upon a review of your application for certification of ADA paratransit eligibility, the Lowell Regional Transit Authority has determined that you are not eligible for ADA paratransit service. This determination is based on the following factors:

- (1)
- (2)

Federal law restricts eligibility for ADA paratransit service to persons who cannot, due to a disability, utilize fixed route bus transit service. This determination applies only to your eligibility for ADA paratransit service offered by the Lowell Regional Transit Authority.

If you do not agree with the decision that has been made, you have the right to appeal this determination. Any request for an appeal must be made in writing and must be mailed within 60 days of the date of this letter. The enclosed description of the appeal policy provides additional information about the process. Please also note that if there is any change in your ability to use the fixed route service in the future, you may submit a new application.

Sincerely,

Para-Transit Liaison
LRTA Office of Transportation Access

Enclosures: Description of appeal policy

Attachment H: Appeal Process

Attachment H



AMERICANS WITH DISABILITIES ACT (ADA)

LRTA APPEAL PROCESS

If your ADA Paratransit Eligibility determination results in a finding of ineligible to receive complementary paratransit service and you feel that this determination has been made in error, you have the right to appeal this determination.

To file this appeal, you must notify the Lowell Regional Transit Authority, in writing, within 60 days of the date on the letter advising you that you are ineligible. Your written appeal must state your reasons why you feel that the determination of ineligibility is unjust. After your appeal is received, a hearing will be scheduled to evaluate your case. Staff of the Lowell Regional Transit Authority will serve as the appeal board. This hearing process will allow you to present information and arguments on your behalf. You may have others who are knowledgeable of your physical and/or mental limitations speak on your behalf, but you must pay any costs for these other spokespersons.

After the hearing, you will be advised in writing of the decision of the appeal board. The decision of the appeal board is final. Written notification from the appeal board can be made available in accessible formats upon request.

The Lowell Regional Transit Authority is not required to provide you with complementary paratransit service while your appeal is under consideration. If the appeal board has not made its decision within 30 days of the date on your written request for appeal, you are entitled to complementary paratransit service from that time until a final decision is made.

Attachment I: LRTA Road Runner On-Time Performance

LRTA ROAD RUNNER ON-TIME PERFORMANCE

Date	Run No.	Total Trips*	EARLY					Trips within pickup window	LATE				
			61+	46 to 60	31 to 45	16 to 30	1 to 15		1 to 15	16 to 30	31 to 45	46 to 60	61+
6/25/2015	62	7						7					
6/25/2015	15	8			1			6		1			
6/25/2015	61	1				1		0					
6/25/2015	63	11					1	9	1				
6/25/2015	1	17					2	14	1				
6/25/2015	53	10						9	1				
6/25/2015	51	12						8	2		2		
6/25/2015	31	9						9					
6/25/2015	4	7						6	1				
6/25/2015	41	4						4					
6/25/2015	42	8					1	7					
6/25/2015	5	6						6					
6/25/2015	12	6						6					
6/25/2015	43	8					1	7					
6/25/2015	52	3						3					
TOTAL 6/25/15		117	0	0	1	1	5	101	6	1	2	0	0
ON-TIME PERFORMANCE								86%					
9/1/2015	31	8						6		1		1	
9/1/2015	41	6						4	2				
9/1/2015	42	14						8	4	2			
9/1/2015	12	7						7					
9/1/2015	43	10					2	8					
9/1/2015	5	8						6	2				
9/1/2015	4	5				1	1	3					
9/1/2015	53	7						5	1				1
9/1/2015	1	12					2	7	2			1	
9/1/2015	52	5				1	1	3					
9/1/2015	62	4						3	1				
9/1/2015	61	4						3	1				
9/1/2015	63	15					2	7	5		1		
TOTAL 9/1/15		105	0	0	0	2	8	70	18	3	1	2	1
ON-TIME PERFORMANCE								67%					
*Net of cancellation and no shows													

Attachment J: Road Runner Trips vs. Fixed Route Bus

SAMPLE OF LRTA ROAD RUNNER TRIPS GREATER THAN 60 MINUTES (April-September, 2015) COMPARED TO TRIPS BY
FIXED ROUTE TRANSIT (all times in minutes)

CUSTOMER & DATE	ORIGIN ADDRESS	DESTINATION ADDRESS	FIXED ROUTE TIME 1	TRANSFER TIME	FIXED ROUTE TIME 2	ESTIMATED WALK TIME TO/FROM STOPS	TOTAL FIXED ROUTE TRAVEL TIME	ACTUAL PARATRANSIT TIME	DIFFERENCE
RH 9-15	7 Summer St., Chelmsford	190 William G Dr., Tewksbury	19	19	15	20	73	72	-1
GG 6-24	437 E. Merrimack St., Lowell	365 East St., Tewksbury	33	NA	NA	10	43	80	37
SD 8-31	21 Sheridan Lane, Tewksbury	78 Boston Rd., Billerica	15	5	11	26	57	84	27
VA 7-1	6 Frye St., Lowell	276 Broadway St., Lowell	2	NA	NA	20	22	85	63
GN 9-11	10 Wood St., Lowell	19A Ellsworth St., Lowell	14	39	5	10	68	99	31
JT 7-21	591 Springs Rd., Bedford	71 Constance Dr., Lowell	26	10	28	39	103	100	-3
LR 7-24	333 Main St., Tewksbury	1359 Pawtucket Blvd, Lowell	15	26	28	8	77	105	28
SS 9-1	36 Mt. Pleasant St., Billerica	15 Concord Rd., Billerica	16	14	13	10	53	105	52
JH 7-9	6 Beaulieu St., Chelmsford	345 North Rd., Chelmsford	9	10	25	10	54	116	62
EB 8-3	176 Walker St., Lowell	5 Laurie Lane, Lowell	15	NA	NA	10	25	131	106
GK 8-11	7 Summer St., Chelmsford	96 Richardson Rd., Chelmsford	15	19	16	37	87	133	46
JP 9-3	16 River St., Billerica	700 Boston Rd., Billerica	10	NA	NA	11	21	135	114