

**Springfield Mass Transit District (SMTD)
Springfield, Illinois**

July 18-21, 2005

Summary of Observations

**Review of Stop Announcement
and Route Identification Efforts**

Prepared for

**Federal Transit Administration
Office of Civil Rights
Washington, DC**

Prepared by

**Planners Collaborative, Inc.
with
TranSystems Corp.**

February 6, 2012

CONTENTS

1	Introduction.....	1
1.1	Overview of the Review	1
1.2	Overview of SMTD	2
1.3	Formal Complaints.....	3
1.4	Agency and Rider Comments	4
2	Summary of Findings.....	5
2.1	Findings Regarding Stop Announcements	5
2.2	Findings Regarding Route Identification.....	5
2.3	Findings Regarding Driver Assistance and Wheelchair Securement	6
3	Review of On-Board Stop Announcements.....	7
3.1	Regulatory Requirements	7
3.2	Consumer Comments.....	7
3.3	Review Methodology.....	7
3.4	Observations Related to On-Board Stop Announcements.....	8
3.5	Findings	17
3.6	Recommendations.....	17
4	Review of Vehicle/Route Identification Efforts	19
4.1	Regulatory Requirements	19
4.2	Consumer Comments.....	19
4.3	Review Methodology.....	19
4.4	Observations of Route Identification Efforts.....	20
4.5	Findings	22
4.6	Recommendations.....	22
5	Review of Fixed Route Driver Assistance.....	24
5.1	Regulatory Requirements	24
5.2	Consumer Comments.....	25
5.3	Review Methodology.....	25
5.4	Observations Related to Driver Assistance	26
5.5	Findings	32
5.6	Recommendations.....	32
<i>Attachment A</i>	On-Site Review Schedule	
<i>Attachment B</i>	SMTD Response to Draft Report	
<i>Attachment C</i>	SMTD Notices, Memoranda, and Bulletins Regarding On-Board Stop Announcement Policies	
<i>Attachment D</i>	Cover and Table of Contents of SMTD’s “Rule Book for Operators and Maintenance Personnel.”	
<i>Attachment E</i>	Sample “Operator’s Calling Streets” Monitoring Form	

<i>Attachment F</i>	SMTD's Progressive Disciplinary Policy Regarding Stop Announcements and Summary of Actions Taken From February 2002 Through November 2004
<i>Attachment G</i>	Driver Interview Form
<i>Attachment H</i>	On-Board Stop Announcement Assessment Form
<i>Attachment I</i>	SMTD Policy Regarding Bus/Route Identification
<i>Attachment J</i>	SMTD Policy Regarding Driver Assistance
<i>Attachment K</i>	Copy of "Report of Accident or Unusual Occurrence" Form Dated August 4, 2004

1 Introduction

1.1 Overview of the Review

The Federal Transit Administration (FTA) is responsible for ensuring compliance with the Americans with Disabilities Act of 1990 (ADA) and the U.S. Department of Transportation (DOT) regulations (49 CFR Parts 27, 37, and 38) that implement this civil rights law. As part of its compliance efforts, FTA, through its Office of Civil Rights, conducts periodic reviews of fixed route transit services operated by grantees. In a letter dated June 2, 2005, FTA notified the Springfield Mass Transit District (SMTD) that a fixed route review had been scheduled and would be conducted within 120 days of the date of the letter. The FTA notification letter also explained that the review would consider:

1. On-board stop announcements
2. Route identification efforts

Planners Collaborative, Inc. of Boston, Massachusetts, and TranSystems Corp. of Medford, Massachusetts, conducted the review. Russell Thatcher of TranSystems served as the review team leader. David Chia of Planners Collaborative assisted with the review.

The stop announcement and route identification fieldwork began Monday, July 18, 2005. An opening conference was held on Wednesday, July 20, 2005. In addition to Mr. Thatcher and Mr. Chia, the following SMTD representatives attended the opening meeting:

- Richard E. Fix, Managing Director
- Angela M. Brooks, Superintendent of Transportation

Cheryl Hershey, ADA Team Leader in the FTA Office of Civil Rights, participated in the opening conference via telephone.

Ms. Hershey opened the meeting by thanking SMTD for its assistance with the review. She noted that the review team had been on site since Monday, July 18. She explained that reviews of on-board stop announcements were conducted by providing a general timeframe for the review, having the team make initial observations, and then notifying the agency and requesting an opening conference. This process was used to ensure that observations of stop announcements would not be influenced by the fact that an FTA review team was on-site.

Ms. Hershey noted that FTA viewed the reviews not just as part of their overall ADA compliance effort, but also as a chance to provide technical assistance on ADA issues. She indicated that the review team was available to answer any questions that SMTD staff might have or to offer suggestions on any issues that SMTD might have.

Mr. Thatcher then presented the review schedule. He described what observations had been made during the first two days on site. He also indicated the additional information that the review team planned to collect and meetings with staff that needed to be held on the third and

fourth days of the review. Arrangements were made with SMTD staff assistance for the meetings indicated in the proposed schedule. A copy of the on-site schedule is provided in Attachment A.

An exit conference was held on Thursday, July 21, 2005, following the review team's on-site work. Those present at the exit conference were:

- Richard Fix, SMTD Managing Director
- Angela Brooks, Superintendent of Transportation
- Russell Thatcher, TranSystems (Review Team)
- David Chia, Planners Collaborative (Review Team)

Ms. Hershey of FTA again participated via telephone. Ms. Hershey began the exit conference by thanking SMTD staff for their cooperation and assistance with the review. She indicated that a draft report would be prepared and forwarded to SMTD for review and comment. SMTD's comments on the draft would then be incorporated into the final report. Ms. Hershey noted that once the report became a final document, it would be subject to release in response to Freedom of Information Act (FOIA) requests. Mr. Thatcher then reviewed the preliminary findings and recommendations from the on-site visit. He noted that while the review was intended primarily to consider on-board stop announcement and route identification efforts, one other issue was identified during the course of the review. This other issue related to driver assistance provided in boarding and exiting fixed route vehicles. Information about driver assistance was therefore included in the exit conference discussion and will be addressed in the report. Ms. Hershey noted that once finalized, SMTD will need to respond to the findings. The recommendations are offered as suggestions and will not require a response. SMTD may, however, consider the recommendations as possible ways to address the findings.

Section 2 of this report provides a summary of the findings and recommendations. Section 3 describes each part of the review process related to on-board stop announcements. Section 4 includes observations, findings and recommendations regarding route identification efforts. Section 5 then includes observations, findings and recommendations related to driver assistance.

SMTD was provided with a draft copy of the review report for review and response. A copy of the correspondence received from SMTD on December 2, 2011, documenting their response to the draft report, is included as Attachment B.

The remainder of this section provides an overview of the transportation services provided by SMTD, formal ADA complaints received by FTA regarding SMTD fixed route services, and recent rider comments regarding the fixed route service.

1.2 Overview of SMTD

SMTD provides fixed route and ADA complementary paratransit service in the City of Springfield, Illinois. All fixed route and paratransit service is operated directly by SMTD. The

National Transit Database (NTD) report for fiscal year 2002 showed that SMTD serves a population of 153,516 and that the agency has a service area of 87 square-miles.

The fixed route system maps and information available at the time of the on-site review showed 12 main routes that operate year-round. In addition to these routes, SMTD operates one additional route (the “Harrison Park” route) that does not operate during school summer vacation. The Harrison Park route was not operating at the time of the review. SMTD also operates a “Historic Sites” route that circulates through the downtown area and stops at several historic landmarks.

The 12 main routes radiate out from the downtown and are linked at a downtown Transfer Center. The fixed route service operates as a “pulse” system with buses meeting at regular intervals at the downtown Transfer Center to facilitate travel between various sectors of the city. Buses typically operate on half-hour headways during peak morning and afternoon hours and on hourly headways during midday, off-peak hours.

At the time of the on-site review, SMTD operated a fleet of 45 fixed route buses. Forty-one buses in the fleet were wheelchair accessible (91 percent accessible). Twenty-three buses were equipped with wheelchair lifts and 18 buses were low-floor and equipped with wheelchair ramps.

Four of the main routes plus the Historic Sites route were advertised at the time of the review as being 100 percent accessible. Schedules indicated that all runs on those routes were served by accessible buses. The other eight of the 12 main routes were partially accessible, with certain runs advertised as accessible and other runs shown as not being accessible on the schedules. None of the runs on the Harrison Park route were listed as accessible.

NTD system information showed that SMTD provided a total of 1,653,262 unlinked passenger trips on the fixed route system in fiscal year 2002.

1.3 Formal Complaints

One formal ADA complaint was on file with FTA at the time of the review. The complaint was filed in December 2003. The complaint indicated two main issues with the fixed route system. These were:

- Issues with stop announcements being made consistently. It also was noted that stop announcements, if made, often can't be heard.
- A policy adopted by SMTD that did not allow drivers to assist riders in getting up and down ramps on accessible buses. The complaint transmitted copies of SMTD Disabled Persons Advisory Committee minutes for January through September 2003 that indicated that the issue of driver assistance was raised several times by riders with disabilities. Riders also contacted national disability organizations to determine what the correct policy should be. The minutes indicate that there were extended discussions between SMTD and the Disabled Persons Advisory Committee on this issue. In September 2003,

SMTD circulated a proposed policy that would require drivers to kneel buses whenever a ramp is deployed as well as on request or when drivers feel it would be helpful. The policy also requires drivers to provide “reasonable assistance” with securement systems, lifts and ramps. Factors to be considered in determining if assistance is reasonable to provide include the size and weight of the wheelchair, the steepness of the ramp, the “physical stature” of the operator, or any other physical limitations the driver may have. The draft policy included in the complaint file did not include an “effective date.”

1.4 Agency and Rider Comments

Prior to the on-site visit, the review team contacted and conducted phone interviews of several riders and disability advocates. This included contact with the US Attorneys Office and with the Springfield Center for Independent Living (the two key agencies associated with the original complaint).

Those contacted indicated that stop announcements seemed to have improved in recent months. It was noted, though, that announcements could be “spotty.” One individual indicated that his recent experience was that most drivers made stop announcements, but that a few drivers still were not announcing stops as required.

On the issue of driver assistance, riders and advocates contacted indicated that the proposed driver assistance policy cited in the formal ADA complaint had been formally implemented. Several riders expressed concern, though, about the full and effective implementation of the policy.

Advocates and riders noted that fixed route buses are equipped with video cameras that record activity on the bus. Advocates that were contacted indicated that SMTD uses these tapes to see if stop announcements are being made. They noted, however, that SMTD staff have indicated that a formal complaint is required before the tapes can be pulled and reviewed.

2 Summary of Findings

This chapter summarizes the findings made as a result of the review. Findings denote deficiencies in ADA compliance or topics on which FTA requires additional reporting to ensure an ADA compliance issue does not exist. Findings shall always require corrective action and/or additional reporting. Recommendations are statements detailing suggested changes to policy or practice to ensure best practices under the ADA. The basis for findings and recommendations are detailed in Chapters 3 through 5.

2.1 Findings Regarding Stop Announcements

1. First-hand observations of stop announcements on 37 route segments indicated that drivers made audible stop announcements in accordance with SMTD policy on only 14 of these route segments (38 percent). Some level of stop announcement was made on another 11 route segments (30 percent), but these announcements were not in accordance with established policy or ADA requirements either because they were not audible or because an adequate number of stops was not announced. On 12 of the route segments observed (32 percent), drivers did not make any stop announcements. SMTD must take steps to ensure that drivers are making stop announcements in accordance with 49 C.F.R. Section 37.167(b)(1), which requires that drivers announce at least at transfer points with other fixed routes, other major intersections and destination points, and intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.
2. SMTD has developed lists of stops to be announced on each route. The lists include major intersections, end points, and stops that intersect with other routes. The current stop announcement policy does not state, however, that operators also should announce other stops requested by riders. Under DOT ADA regulations at 49 C.F.R. Section 37.167(b)(2), drivers must announce any stop on request of an individual with a disability. SMTD should add to its current stop announcement policy that operators must announce stops that are requested by riders. This appears to be done in practice, but should be made part of the formal policy.

2.2 Findings Regarding Route Identification

1. The DOT ADA regulations at 49 C.F.R. § 37.167(c) state that when more than one route is served at the same stop, the entity shall provide a means by which individuals with disabilities or visual impairments can identify the proper vehicle to enter or be identified to the operator as a person seeking a ride on a particular route. While SMTD has an operating rule (issued May 17, 2000) that requires operators to announce the destination of their route before leaving the downtown transfer center, based on first-hand observations by the review team, drivers did not make these announcements. Nor does SMTD's rule on bus/route identification address operators' announcing the route number or destination of buses to riders waiting at stops which are served by more than one route, other than at the downtown

transfer center. The SMTD rule on bus/route identification does not appear to be part of initial bus operator training. Most bus operators did not appear to be familiar with the bus identification policy.

2.3 Findings Regarding Driver Assistance and Wheelchair Securement

1. Since November 2003, SMTD has had a policy regarding bus operator assistance in accordance with Section 37.165(f) of the DOT regulations implementing the ADA. However, SMTD drivers and other staff have inconsistent interpretations of the new policy. Even the SMTD trainer did not appear to be clear on what specific guidance is given to bus operators regarding assisting riders with large wheelchairs. Four of the 10 drivers interviewed had inconsistent interpretations of the new policy or indicated they were not clear what was specifically required.
2. Bus operator interviews and team member observations also indicated that it is common practice for drivers to secure riders who use wheelchairs with only the passenger seatbelt and shoulder harness. The DOT ADA regulations at 49 C.F.R. § 38.23(d)(7) states that seat belts and shoulder harnesses shall not be used in lieu of a device which secures the wheelchair or mobility aid itself. SMTD has video documentation of several instances where riders—particularly riders using scooters—tipped over during transport. The seatbelt and shoulder harness do not provide adequate securement.

3 Review of On-Board Stop Announcements

This part of the compliance review focused on SMTD’s efforts and successes in implementing the stop announcement requirement. Included in this section are:

- A description of the regulatory requirements related to on-board stop announcements
- A description of the approach and methodology used to conduct the review of on-board stop announcements
- A summary of information collected and first-hand observations of stop announcement efforts
- Findings and recommendations of the review team for addressing issues that were identified

3.1 Regulatory Requirements

Section 37.167(b) of the DOT regulations implementing the ADA contains the following requirement related to the announcement of stops on fixed route systems operated by public or private entities:

...the entity shall announce stops as follows:

(1) ...at least at transfer points with other fixed routes, other major intersections and destination points, and intervals along the route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.

(2) ...any stops on request of an individual with a disability.

3.2 Consumer Comments

The original formal complaint filed with FTA in December 2003 stated that stop announcements were not made consistently. If the drivers made the announcements, riders could not always hear or understand them.

In the telephone interviews conducted by the review team prior to the site visit, several advocates and riders indicated that stop announcements seemed to have improved in recent months. It was noted, though, that announcements could be “spotty.” One individual indicated that his recent experience was that most drivers made stop announcements, but that a few drivers still were not announcing stops as required.

3.3 Review Methodology

To determine SMTD’s current performance in providing on-board stop announcements, the review team collected and reviewed the following information.

- Information about SMTD policies and procedures for announcing stops
- Notices, bulletins, and memoranda detailing stop announcement policies
- Operator training materials
- Recent SMTD service complaints regarding stop announcements
- Service monitoring information related to stop announcements
- Interviews with 10 bus drivers to ascertain their understanding of stop announcement policies
- First-hand observations by the review team who rode on all 12 SMTD fixed routes to record on-board stop announcements

The on-site review of stop announcements took place from July 18 to 21, 2005. First-hand on-street observations were made at this time.

3.4 Observations Related to On-Board Stop Announcements

3.4.1 Policies and Procedures Regarding On-Board Stop Announcements

In advance of the on-site visit, SMTD provided copies of notices, memoranda, and bulletins issued in recent years that address the on-board stop announcement policy. Copies of these notices, memoranda and bulletins appear in Attachment C.

Working with its Disabled Persons Advisory Committee (DPAC), SMTD has developed lists of major intersections and stops for each fixed route. The most recent lists were revised on February 21, 2002. Attachment C includes a copy of these lists (titled “Stop Announcements”). Attachment C also includes a notice dated February 22, 2002, that details SMTD’s policy regarding announcement of these stops and intersections. As per this notice, drivers are required to “call the minimum listed but not necessarily the same ones listed.” SMTD managers explained that this means that if the Stop Announcement list indicates four stop announcements for the Route 1 Outbound route, drivers must call at least four stops. The list indicates the ones that are suggested, but drivers can choose to announce stops on the list or others, as long as they announce at least four stops. Staff noted that it is their experience that most drivers will announce at least the stops on the list and may then add others in-between these suggested stops. They noted that the Stop Announcement lists include at least four and up to six stops for each route.

The February 22, 2002, notice also stated that:

Stop announcements need not be made if no riders are on the bus, but must be made even if only one rider is on the bus and the driver is familiar with that rider and knows where that person typically gets off.

School tripper¹ streets need not be called unless the bus is traveling along a regular line route.

The February 22, 2002, notice also indicated that use of the microphone (PA system) was optional. At that time, it was acceptable for drivers to call out stops without using the microphone as long as the announcement was made loudly. This policy was changed on November 1, 2004. A notice titled “NEW POLICY: Calling of Streets” was issued at that time (also included in Attachment C). The new policy, which is still in effect, requires use of the microphone/PA system for all stop announcements. As indicated in this notice, the policy was changed following the filing of the formal ADA complaint with FTA that drivers were not always making the announcements loud enough to be heard throughout the bus.

As part of the review, team members also examined SMTD’s “Rule Book for Operators and Maintenance Personnel.” A copy of the cover and the table of contents of the current Rule Book are provided in Attachment D. This Rule Book is provided to all new drivers and is intended to summarize important policies and procedures. The current version of the Rule Book is dated February 16, 1999. A review of the Rule Book indicated that it does not include information about any ADA requirements such as stop announcements. SMTD managers noted that the more recent notices and bulletins are technically considered additions to the Rule Book. They also noted that the Rule Book was overdue for an update and that it would be good to include the stop announcement policy as well as other ADA-related policies in the updated version.

3.4.2 Operator Training

While on-site, a member of the review team interviewed the designated driver trainer at SMTD. The team member requested a training curriculum. The trainer indicated, however, that there was no formal written curriculum. Also requested was a copy of a driver training manual or copies of materials distributed to drivers. The trainer indicated, though, that there was no formal training manual or packaged set of materials.

The driver trainer described the contents of the current training program during the interview. He indicated that driver training typically takes about three weeks. He noted that on the morning of the first day, trainees are introduced to the different styles of buses and the basics of how to operate each type of bus. This includes demonstrating how to operate the wheelchair lifts and the wheelchair ramps on the low-floor buses. The afternoon of the first day of training is then spent driving one style of bus in a controlled environment at the State Fairgrounds.

The morning of the second day of training is then spent driving a second style of bus at the State Fairgrounds. Beginning on the afternoon of the second day, trainees typically begin learning the various routes in the system. Routes are driven in a “non-loaded” mode (driven without passengers in a bus designated as “Out of Service”). The trainer noted that each route is driven at least once without passengers. Trainees are also familiarized with school trippers.

¹ School trippers are runs or portions of runs that are designed to serve schools and students.

As drivers are familiarized with each route, they are also instructed on the stop announcement policy. The information on suggested stop announcements for each route is reviewed.

By the end of the first week of training, it was noted that trainees begin in line-haul service on one route. For the next week to week and a half, trainees drive with experienced drivers on various routes.

About three days of classroom training also is incorporated into the three-week training period. The trainer indicated that there is no set time for the classroom training, and that it was “on and off” throughout the three-week period. The classroom training covers vehicle checklists and inspections procedures and other required paperwork. The trainer also noted that a film titled “Passenger Assistance Workshop” is made available in the training rooms and each trainee is required to review the film.

The trainer also noted that SMTD has an arrangement with the Springfield Center for Independent Living (SCIL) to have staff from that agency periodically provide instruction to drivers. This is done about every year or two, depending on the need. SCIL staff provide instruction on assisting riders with disabilities and other ADA requirements.

3.4.3 SMTD Service Monitoring and Enforcement

Monitoring

SMTD has cameras on all of its fixed route buses. These cameras are available for reviewing any accident, driver or passenger activity, or other incident. SMTD’s policies regarding the monitoring of drivers’ making stop announcements limit how managers can review drivers for this task. “Calling streets” is a secondary activity for SMTD drivers. This means that SMTD only uses the video recordings to review stop announcements if it receives a consumer complaint, or when there has been another type of incident on the bus that prompts a review of the recordings. SMTD does not do random reviews of recordings to specifically observe compliance of bus stop announcements.

When a bus is in service, a “camera pack” (equivalent to a computer hard drive) on board the bus stores video and audio data gathered by multiple cameras (four cameras in older systems, six cameras in newer systems). At the end of a service day, SMTD maintenance staff pull the camera packs from each bus. If there is no request from a rider or road supervisor, or no incident that prompts a review of a camera pack, then SMTD re-uses the camera pack without downloading the data contained on it. Depending on their availability, a camera pack may be re-used as quickly as the following day of service.

SMTD managers said that if ongoing reporting of progress was required as a result of the review, they would accept a request from FTA for a specified day of camera packs from the fleet, which either SMTD or FTA staff could then review.

When there is an incident that prompts the review of camera pack data, the camera pack is pulled from the bus at the end of the service day. SMTD has the corresponding computer system that allows the superintendent of transportation or one of her staff to view (and listen to) the data. From the start of 2005 to mid-July 2005 (the time of the review team's site visit), SMTD had a total of 197 incidents ("Video Incident/Accident Reports" – VIARs) for which staff pulled the camera packs and reviewed the data: an average of seven incidents per week. During this period, four of these 197 incidents were specifically for "calling streets." Most incidents are related to vehicle accidents, passenger slips and falls, or confrontations between driver and passenger or two passengers.

Data from the camera pack is copied to a zip drive or CD for permanent storage. SMTD staff review the camera pack data for each incident, starting from approximately 30 minutes prior to the incident. Because of the limited capacity of a zip drive (28 minutes) or CD (15 minutes), they will transfer only the relevant portions of the camera pack data to the zip drive or CD. When the SMTD staff review the data for these other types of incidents, they take the opportunity to monitor the drivers' performance of stop announcements.

To monitoring the stop announcements, the staff view and listen to the recording of a bus in service. They view one of the camera angles that lets them see where along the route the bus is. They match that video with the audio of the driver. They use an "Operator's Calling Streets" data sheet to record the stop names and whether the driver made the stop announcement. They also write down other comments on the data sheet, e.g., "not clear or loud enough," "only saying one street not intersection." Attachment E presents a sample completed data sheet for stop announcements.

During June and July 2005, SMTD staff reviewed the data from 16 VIARs for stop announcements. Due to the limitations of the technology and data collected, however, staff are not always able to make a clear determination of whether the operators are properly making bus stop announcements. For example, the audio quality of the recording may be poor, so the reviewer may not be able to hear the driver. Or none of the cameras may be pointed so that the reviewer can see the street intersections.

Furthermore, most of the storage on the zip drive or CD may be devoted to the primary incident (vehicle accident, slip or fall, confrontation), leaving only a small sample of time (sometimes 10 minutes or less) showing on-road service. This limitation would not apply when monitoring of stop announcements is the primary reason for the review of the camera pack data. But as noted earlier, there were only four complaints concerning stop announcements in more than six months. Consequently, most of the available footage of operator performance is produced for incident reviews. The SMTD managing director said that he has been encouraging the citizen's advisory committee to get more riders to make formal complaints about stop announcements so that SMTD has more opportunity to monitor stop announcements "for cause."

Enforcement

SMTD has established a progressive disciplinary process related to the policy requiring that stops be announced. This disciplinary process was developed cooperatively with the operators' union. A copy of the process is provided in Attachment F.

A first offense for not announcing stops as required calls for SMTD to issue a warning letter to the employee that is made a part of the employee's personnel file. A second offense calls for a one-day suspension without pay. The third offense calls for a two-day suspension without pay. A fourth offense calls for a three-day suspension without pay. A fifth offense calls for termination of employment.

Also provided in Attachment F is a summary of disciplinary actions taken for the period from February 2002 through November 2004. During this period, 15 warning letters were issued to operators for first offenses. There also were five suspensions without pay for subsequent offenses. No employees were terminated during this period of time.

3.4.4 Bus Operator Interviews

The review team interview ten SMTD drivers as part of the on-site review. Several questions pertaining to on-board stop announcements were asked. Attachment G includes a copy of the driver interview form used by team members.

In response to the question, "When do you do on-board stop announcements?" all ten drivers appeared to be familiar with the suggested stop announcement lists. Four drivers indicated that they announce what is on the list plus other major intersections or stops. One driver said he announced all major streets and stops and really does not use the set list. Another driver said she was somewhat familiar with the list but tended to announce different stops. One driver, who also was familiar with the list, said he announced stops "when visually impaired or other disabled riders were on board."

In response to the question, "What would you do if a rider asked you to announce a stop that is not on the list?" all ten drivers indicated that they would make the stop announcement as requested.

In response to the three questions about using the public address (PA) system, all but one driver said they use the PA system. The one driver said he had a very loud voice and did not need the PA. Most drivers also indicated that the PA systems were in good working condition. Three drivers said the PA systems work about "90 percent of the time."

All ten drivers also indicated that they check the PA system as part of the bus inspection at the beginning of their shift. Most drivers said that if the PA was not working, they would write it up and then make the announcements without the PA. Two drivers said they would look to have the PA fixed or to switch out the bus.

Finally, in response to the questions about whether they had all of the information and equipment they needed to make on-board stop announcements effectively, most drivers indicated that they had everything they needed and that there were no issues. One driver said that the microphones needed to be closer and that he had to lean over to get close enough to the microphone (although, on inspection of the buses, it appeared that the microphones were on a flexible “neck” and the location could be adjusted). Another driver said she had not been familiar with how to adjust the volume for the PA system and said it would be helpful if that was part of the driver training. A third driver complained about having to activate the system with a foot pedal while he was driving, but then indicated that the foot pedal was probably better than a switch that would need to be worked by hand. Finally, one driver said that when she was new she had different routes every day and it was hard to know all of the suggested stops for each route. She suggested more training on this or something to help new drivers know all of the stops to be announced.

3.4.5 Review Team Observations

On Monday and Tuesday, July 18 and 19, 2005, the review team took a total of 37 rides on the SMTD fixed route system. All 12 “main” routes were ridden at least once. To observe as many drivers as possible (as well as to remain as anonymous as possible), review team members would typically board a bus at the downtown transfer center and ride to the mid-point of the route (usually one of the furthest stops from the downtown). The reviewer would then disembark from the bus, wait for the next bus, and ride the next bus back to the transfer center. For routes that were interlined, this allowed the reviewers to observe different drivers on that route. For routes where only one bus and driver served the route, disembarking and reboarding the next run lessened the chance that the operator would know that the route was being monitored.

An “On-Board Fixed Route Stop Announcement Assessment Form” was used to collect information (see Attachment H). The list of suggested stops for that route was added to each form. Reviewers then recorded whether the suggested stops were announced or if other stops were announced. For each observation, it was noted whether the announcement was made using the PA system or was made by “voice” (not amplified). Finally, reviewers noted whether the announcements were audible. Reviewers sat between the middle and the back of the bus to make this latter determination.

A general assessment of whether the announcements made complied with SMTD policy was then made. If operators announced the stops on the suggested list, or at least as many stops as required, and these announcements were audible, the performance was noted as “good.” If some stops were announced, but not the number required, or if some of the stop announcements were not audible, the performance was rated as “mixed.” Finally, if no stops were announced, performance was listed as “nothing.”

Table 3.1 summarizes the results of the on-board stop announcement observations. As shown, an adequate number of stops was announced and announced audibly on 14 of the 37 routes surveyed (38 percent). Some level of announcements was made on another 11 routes (30 percent), but not to a level that would meet SMTD requirements or be considered adequate. No announcements were made on the remaining 12 routes that were surveyed (32 percent).

Also, of the 143 stop announcements that were made, 132 (92 percent) were made using the PA system and only 11 (8 percent) were made without the PA. Of the 143 stops announced, 116 were audible and 27 were not audible. Twenty-six of the stops that were announced using the PA system were not audible. In these cases, the volume was either turned very low, or the operator did not speak close enough to the microphone for the announcement to be heard.

Table 3.1 – SMTD Fixed Route On-Board Stop Announcement Observations: July 18-19, 2005

Route (inbound/ outbound)	# of Stops on List	# of “List Stops” Called	# of “Other Stops” Called	Used PA		Voice (No PA)		General Performanc e Assessment
				Audible	Not Audible	Audible	Not Audible	
1S (out)	4	2	1	3	0	0	0	Mixed
1S (in)	5	3	2	3	2	0	0	Mixed
1N (out)	4	0	1	0	0	1	0	Nothing
1N (in)	4	4	4	6	2	0	0	Good
2N (out)*	4	3	1	1	3	0	0	Mixed
2N (in)	6	4	6	3	7	0	0	Mixed
3 (out)**	2	2	8	10	0	0	0	Good
3 PM (in)	4	0	0	0	0	0	0	Nothing
4 (out)	5	3	3	6	0	0	0	Good
4 (in)	5	0	0	0	0	0	0	Nothing
5N (out)	4	4	0	0	0	4	0	Good
5N (in)	4	0	0	0	0	0	0	Nothing
5S (out)	4	0	0	0	0	0	0	Nothing
5S (in)	4	0	0	0	0	0	0	Nothing
5N (out)	4	3	0	0	0	2	1	Mixed
6W (out)	6	0	2	2	0	0	0	Mixed
6W (in)	6	2	3	5	0	0	0	Mixed
6E (out)	4	3	3	6	0	0	0	Good
6E (in)	4	0	0	0	0	0	0	Nothing
7S (out)	4	2	8	10	0	0	0	Good
7S (in)	7	5	0	3	2	0	0	Mixed
7W (in)	5	4	6	8	2	0	0	Good
7W (out)	4	3	0	3	0	0	0	Good

Table continued on next page

Table 3.1 (cont.) – SMTD Fixed Route On-Board Stop Announcement Observations: July 18-19, 2005

Route (inbound/ outbound)	# of Stops on List	# of “List Stops” Called	# of “Other Stops” Called	Used PA		Voice (No PA)		General Performanc e Assessment
				Audible	Not Audible	Audible	Not Audible	
8S (out)	3	3	3	6	0	0	0	Good
8S (in)	5	4	2	6	0	0	0	Good
8W (out)	3	3	1	4	0	0	0	Good
8W (in)	4	4	0	4	0	0	0	Good
9E (out)	3	0	0	0	0	0	0	Nothing
9E (in)	5	0	0	0	0	0	0	Nothing
9W (out)	3	0	0	0	0	0	0	Nothing
9W (in)	4	2	1	2	1	0	0	Mixed
10 (out)	5	5	6	8	3	0	0	Good
10 (in)	6	2	0	0	0	2	0	Mixed
11 (out)	7	0	0	0	0	0	0	Nothing
11 (in)	7	6	0	2	4	0	0	Mixed
12 (out)	5	3	3	5	0	1	0	Good
12 (in)	6	0	0	0	0	0	0	Nothing
TOTALS	169	79	64	106	26	10	1	14 Good 11 Mixed 12 Nothing

* Reviewer got off just before last stop so didn’t observe last listed stop announcement.

** Bus broke down half way into the route, so reviewer observed only two of the four listed stop announcements

3.5 Findings

1. First-hand observations of stop announcements on 37 route segments indicated that drivers made audible stop announcements in accordance with SMTD policy on only 14 of these route segments (38 percent). Some level of stop announcement was made on another 11 route segments (30 percent), but these announcements were not in accordance with established policy or ADA requirements either because they were not audible or because an adequate number of stops was not announced. On 12 of the route segments observed (32 percent), drivers did not make any stop announcements. SMTD must take steps to ensure that drivers are making stop announcements in accordance with 49 C.F.R. Section 37.167(b)(1), which requires that drivers announce at least at transfer points with other fixed routes, other major intersections and destination points, and intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.
2. SMTD has developed lists of stops to be announced on each route. The lists include major intersections, end points, and stops that intersect with other routes. The current stop announcement policy does not state, however, that operators also should announce other stops requested by riders. Under DOT ADA regulations at 49 C.F.R. Section 37.167(b)(2), drivers must announce any stop on request of an individual with a disability. SMTD should add to its current stop announcement policy that operators must announce stops that are requested by riders. This appears to be done in practice, but should be made part of the formal policy.

3.6 Recommendations

1. The list of stops SMTD has developed that are to be announced for each route is a “suggested list”; drivers do not need to announce the suggested stops as long as they make at least the same number of announcements that are on the list. This policy appears to have been adopted with rider and advisory committee input. SMTD should review the effectiveness of the current policy with its Disabled Persons Advisory Committee that allows drivers to announce either the stops on the suggested “Stop Announcement” list or other stops. If they determine that it would be more effective to have the same stops announced consistently, SMTD might want to amend its current policy to require the announcement, at minimum, of an agreed upon set of stops for each route. In addition, SMTD should ensure that drivers are complying with the requirement under DOT ADA regulations at 49 C.F.R. Section 37.167(b)(1) that drivers announce at least at transfer points with other fixed routes, other major intersections and destination points, and intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.
2. Stop announcement policies are included in notices that are posted in the driver lounge. The most recent version of the SMTD Rule Book is dated February 16, 1999. The Rule Book does not include policies related to stop announcements or other important ADA requirements. SMTD should update its “Rule Book” to include information about its stop

announcement policies. The Rule Book should also include other important ADA requirements, e.g., driver assistance, mobility aid securement, accommodating service animals, and life support systems, vehicle/route identification.

3. SMTD should develop a more formal training program and materials. It should develop and use a written curriculum and a set of driver training materials for all new drivers. This material should include policies related to ADA requirements, including the stop announcement policy.
4. To assist operators with remembering the list of stops to be announced, SMTD should develop laminated cards with suggested stop announcements for each route that can be placed in a rack in the driver lounge area. Operators can then take the appropriate card with them and then return it to the rack at the end of their shift. Other transit systems follow this practice and have reported it to be a useful tool for drivers, particularly new drivers.
5. SMTD should conduct additional monitoring and enforcement of the stop announcement policy to improve the current level of compliance. SMTD should consider changing its categorization of stop announcements to be a primary activity so that tapes from cameras can be used in random monitoring. SMTD should also consider conducting random observations by Road Supervisors or use of a “secret rider” program.

4 Review of Vehicle/Route Identification Efforts

This part of the compliance review focused on SMTD's efforts and successes in implementing the vehicle/route identification requirement. Included in this section are:

- A description of the regulatory requirements related to vehicle/route identification;
- A description of the approach and methodology used to conduct the review of route identification efforts;
- A summary of information collected and first-hand observations regarding route identification; and
- Findings and recommendations of the review team for addressing issues that were identified.

4.1 Regulatory Requirements

Section 37.167(c) of the DOT regulations implementing the ADA contains the following requirement related to the identification of fixed route services:

Where vehicles or other conveyances for more than one route serve the same stop, the entity shall provide a means by which an individual with a visual impairment or other disability can identify the proper vehicle to enter or be identified to the vehicle operator as a person seeking a ride on a particular route.

4.2 Consumer Comments

There were no FTA formal complaints concerning external route announcements.

In the telephone interviews, riders and advocates did not indicate issues with the lack of external route announcements. In its review of rider complaints on file at SMTD, the review team did not identify any complaints related to the lack of making external route announcements.

4.3 Review Methodology

To determine SMTD's current performance in identifying buses or passengers at stops served by more than one route, the review team performed the following tasks:

- Reviewed SMTD's policies and procedures for vehicle/route identification
- Gathered and reviewed notices, memoranda, and bulletins related to route identification policies
- Reviewed operator training related to route identification
- Reviewed service monitoring information related to vehicle/route identification
- Interviewed 10 drivers to ascertain their understanding of vehicle/route identification policies and operational practices

- Conducted first-hand observations of route identification efforts during the site visit

4.4 Observations of Route Identification Efforts

4.4.1 Policies and Procedures Regarding the Route Identification System

SMTD's policy regarding vehicle/route identification is detailed in a notice dated May 17, 2000. Attachment I includes a copy of this notice. This notice states that:

Upon leaving the downtown transfer center each operator will announce the destination of his or her route. Operators will also announce street names where routes cross or where two routes traveling the same route separate.

As indicated in Section 1 of this report, the SMTD fixed route service operates as a "pulse system." The downtown transfer center is therefore the major point at which all routes meet. There are a total of six areas at the transfer center where buses pull in and pull out. These are designated by letters as zones A to F. The following routes stop at each of these designated zones:

<u>Transfer Center Area</u>	<u>Routes</u>
A	Routes 1S, 3, 4, 5N, and 6W
B	Routes 1N, 8W, and 9W
C	Routes 6E, 7W, and 8S
D	Routes 2N, 5S, and 9E
E	Harrison Park
F	Routes 7S, 10, 11, and 12

Within each of the six designated stop areas, there is no set order in which buses line up on arrival. The order of the buses in each area depends on when the buses complete their prior run. The bus that completes its run first will end-up at the front of the stop area, the bus that completes its run second will be second in line, and so on.

Within the immediate downtown area, there also are about 12 stops that are served by more than one route. These are located on Capital, Jefferson, and Washington Streets, and on 4th, 5th, and 7th Streets.

As routes extend further out of the downtown area, they tend to separate and to serve specific sectors of the city. There are limited places outside of the downtown where stops serve more than one route. One of these locations is at the north entrance of the White Oaks Mall, which is served by Routes 7 and 12.

The SMTD Superintendent of Transportation noted that the current policy is somewhat vague and that it has not really been stressed in operations. When asked about operating practices at stops which serve more than one route outside of the downtown transfer center, she indicated

that, in her experience, drivers will typically look for persons waiting at the stop to give some kind of signal that they want to board that particular bus. Drivers, in her experience, typically do not automatically stop at these stops if riders on the bus have not requested the stop and waiting passengers do not signal for the bus to stop.

4.4.2 Training

The SMTD Driver Trainer did not appear to be familiar with the policy that drivers announce their routes when leaving the downtown transfer center. He also did not appear to be familiar with ADA requirements that vehicles and/or routes be identified at all stops that serve more than one route. Policies related to vehicle/route identification therefore do not appear to be covered during driver training.

The driver trainer also confirmed that the typical operating practice at stops that serve more than one route (outside of the downtown transfer center) was for operators to look for waiting passengers to signal for the bus to stop.

4.4.3 Bus Operator Interviews

As part of the on-site review, drivers were interviewed and asked, “Do you identify the bus and route when pulling up to stops? If so, when?” Most drivers did not seem to understand the question at first. An example of identifying the route at the downtown transfer center was then typically given and drivers were asked if they identify their bus and route at the transfer center.

Only one of the 10 drivers interviewed indicated that he announced his bus/route at the downtown transfer center. This driver indicated that he would call out where his bus was going before departing the transfer center. The other nine drivers indicated that announcing the bus/route was not required and was not something that they did. Several drivers indicated that they will stand outside their bus and will assist anyone who asks for a particular bus. One driver also noted that she would provide assistance if it was obvious that someone was confused and looking for a bus. Another driver said that he knew the riders with vision disabilities who used his bus and when he saw them he would go and offer assistance.

Drivers also confirmed that, at stops outside of the downtown transfer center that served more than one route, they typically relied on waiting passengers to signal that they wanted to board. They would typically slow the bus and wait for the passengers to give them some indication that they were looking for that route. If they did stop, they did not call out the route number or destination.

4.4.4 SMTD Monitoring

There does not appear to be any monitoring effort in place to evaluate compliance with the vehicle/route identification policy. This does not appear to be checked when camera packs are pulled and reviewed. It also does not appear to be monitored by Road Supervisors.

4.4.5 Review Team Observations

While waiting for connections at the downtown transfer center, the review team observed numerous buses pulling in and departing. Several hours were also spent watching the complete “pulse” process at the Transfer Center and waiting for all buses to arrive and then leave. Also, while riding the routes, team members made several observations at the White Oaks Mall and at downtown stops that served more than one route.

At no time did the team members observe operators announcing their buses or their destinations when leaving the downtown transfer center. No vehicle/route identification announcements were observed at the White Oaks Mall, or at downtown stops that served more than one route.

The review team did observe several instances where drivers provided information at the transfer center to riders who asked about a particular buses route or destination. A few drivers were proactive and offered assistance and information to riders who appeared to need assistance.

4.5 Findings

1. The DOT ADA regulations at 49 C.F.R. § 37.167(c) state that when more than one route is served at the same stop, the entity shall provide a means by which individuals with disabilities or visual impairments can identify the proper vehicle to enter or be identified to the operator as a person seeking a ride on a particular route. While SMTD has an operating rule (issued May 17, 2000) that requires operators to announce the destination of their route before leaving the downtown transfer center, based on first-hand observations by the review team, drivers did not make these announcements. Nor do SMTD’s rule on bus/route identification address operators’ announcing the route number or destination of buses to riders waiting at stops which are served by more than one route, other than at the downtown transfer center. The SMTD rule on bus/route identification does not appear to be part of initial bus operator training. Most bus operators did not appear to be familiar with the bus identification policy.

4.6 Recommendations

1. SMTD should amend its bus/route identification rule to also require that bus operators announce the route number and destination at all stops which are served by more than one route. This should include stops in the downtown area other than the downtown transfer center. Drivers should not just slow down and rely on waiting passengers at these stops to signal for the bus.
2. SMTD should make bus and route identification policies a formal part of bus operator training. In addition to training for new bus operators, SMTD should also review the policy with existing bus operators as part of ongoing or refresher training.
3. SMTD should begin to check operator compliance with the bus/route identification policy as part of its regular service monitoring efforts. This should include using information on

camera packs, as well as having Road Supervisors check performance as part of their regular service monitoring activities or use of a “secret rider” program.

5 Review of Fixed Route Driver Assistance

While the review was focused mainly on efforts related to on-board stop announcements and vehicle/route identification, the review team also examined SMTD's policies and practices related to driver assistance. Specifically, the team looked at driver assistance provided to riders using wheelchairs when boarding ramp-equipped low-floor buses, as well as driver assistance in securing riders using wheelchairs.

The issue of driver assistance with use of the low-floor bus ramps was raised in the formal ADA complaint filed with FTA in 2003. In 2003, SMTD revised its policies to require driver assistance. Success in implementing this new policy was reviewed as part of this review.

While on site observing fixed route operations, the review team also noted issues in the way that drivers often secured riders who use wheelchairs. Included in this section are:

- A description of the regulatory requirements related to driver assistance and wheelchair securement
- A description of the approach and methodology used to assess driver assistance and wheelchair securement issues
- A summary of information collected and first-hand observations of driver assistance and wheelchair securement
- Findings and recommendations for addressing issues that were identified

5.1 Regulatory Requirements

Section 37.165(f) of the DOT regulations implementing the ADA contains the following requirement related to driver assistance that must be provided on all types of transportation systems by both public and private entities:

Where necessary or upon request, the entity's personnel shall assist individuals with disabilities with the use of securement systems, ramps and lifts. If it is necessary for the personnel to leave their seats to provide this assistance, they shall do so.

Appendix D to the regulation, which provides additional guidance, states:

The entity's personnel have an obligation to ensure that a passenger with a disability is able to take advantage of the accessibility and safety features on vehicles. Consequently, the driver or other personnel must provide assistance with the use of lifts, ramps and securement devices...On a vehicle which uses a ramp, the driver may have to assist in pushing a manual wheelchair up the ramp...

Regarding the securement of wheelchairs, Part 38 of the regulation (Section 38.23(d)) requires wheelchair securement devices to be included on all fixed route vehicles operated by public entities purchased after August 25, 1990. These devices must be provided in each securement area and must be designed to limit the movement of an occupied wheelchair to no more than two inches in any direction under normal vehicle operating conditions. A separate seat belt and shoulder harness for use in securing the passenger is also required. The section also states that:

Such seat belt and shoulder harness shall not be used in lieu of a device which secures the wheelchair or mobility aid itself.

Finally, Section 37.165(c)(1) requires that:

For vehicles complying with Part 38 of this title, the entity shall use the securement system to secure wheelchairs as provided in that Part.

5.2 Consumer Comments

The complaint filed with FTA in December 2003 transmitted copies of SMTD Disabled Persons Advisory Committee minutes for January through September 2003 that indicated that the issue of driver assistance was raised several times by riders with disabilities. The minutes indicate that there were extended discussions between SMTD and the Disabled Persons Advisory Committee on this issue.

During the telephone interviews conducted by the review team, riders and advocates indicated that the proposed driver assistance policy cited in the ADA complaint had been formally implemented. Several riders expressed concern, though, about the full and effective implementation of the policy.

5.3 Review Methodology

To determine SMTD's current performance in providing appropriate driver assistance, the review team collected and reviewed the following information:

- Information about SMTD policies and procedures concerning driver assistance
- Notices, bulletins, and memoranda detailing driver assistance policies
- Operator training materials
- Recent SMTD service complaints and incidents concerning driver assistance and wheelchair securement
- Service monitoring information related to driver assistance and wheelchair securement
- Information from interviews with 10 bus drivers to ascertain their understanding of driver assistance policies
- First-hand observations by the review team as they rode the fixed route system on July 18 and 19, 2005

5.4 Observations Related to Driver Assistance

5.4.1 Policies and Procedures Regarding Driver Assistance

SMTD adopted a new operating rule regarding driver assistance and the use of bus “kneelers” on November 18, 2003. A copy of the new rule is provided in Attachment J. Prior to this time, it appears that there was no formal rule regarding driver assistance. This rule requires that:

- 1. The kneeling device on all buses should be used whenever a ramp is deployed, upon request of any person, and at such times as the operator believes that use of the kneeling feature on a bus is necessary. There shall be no restriction on the use of the kneeling feature of the bus based on weather conditions.*
- 2. Operators should leave their seats for the purpose of assisting individuals with disabilities in the use of securement systems, ramps, or lifts. However, the operator should engage the emergency brake and take the bus out of gear prior to leaving his/her seat.*
- 3. Reasonable operator assistance should be provided to individuals needing assistance to access the bus via a ramp. Reasonable assistance might include guiding a wheelchair to provide balance to the occupant of the chair or assisting in pushing a wheelchair up a ramp. Assisting in the pushing of a wheelchair, whether electric or manual, up a ramp should be provided by the operator upon request, if the operator is able. Factors that would go into the determination of whether an operator is able to assist in pushing that wheelchair up the ramp would include the total weight and size of the wheelchair and occupant, the physical stature of the operator, the steepness of the ramp, and any limiting physical conditions that an operator may have.*
- 4. If any operator cannot provide the needed assistance to an individual with disabilities to enter the bus, the operator shall advise that person and immediately call dispatch before leaving the stop to advise dispatch of the situation.*
- 5. If an operator believes that he/she will never be able to provide assistance in pushing a wheelchair up a ramp because of his/her physical stature or any physical limitations, he/she should advise the district immediately of that situation.*
- 6. The only operator assistance to be provided under this rule is operator assistance required in entering or exiting the bus or in using the securement system on the bus. Operator assistance in transporting or moving an individual with a disability to other locations outside of the vehicle is not required or appropriate.*

5.4.2 Operator Qualifications and Training

The SMTD Superintendent of Transportation indicated that operators are instructed to assist people with using the lifts or ramps only if asked. She said that all operators must be able to provide assistance in the use of both lifts and ramps and that no operator is promised they will only get one type of bus (i.e., only a lift bus so they do not have to assist people with the using ramps). As part of the hiring process, applicants must participate in a medical examination and also must be able to lift at least 50 pounds. She said if drivers cannot provide the required assistance, they are not considered qualified for the job.

The superintendent also said she was not aware of any operator who had claimed that they could not provide the required assistance to riders who use wheelchairs. She indicated that if a current operator raised an issue under the new policy, she understood that they would have to go on Workers Compensation until they were able to do the job.

The SMTD driver trainer indicated that initial training includes instruction in use of the wheelchair securement and passenger restraint systems on the buses. He said that the different systems are demonstrated and used on the days when operators are introduced to each type of bus and then test drive each type of bus at the State Fairgrounds.

New operators also are asked to view the video “Passenger Assistance Workshop,” which is located in the training room. This video does include instruction on how to assist riders who use wheelchairs and other mobility devices. It should be noted, though, that the video and related materials are intended to be used as part of a standard course of instruction and led by a certified Passenger Assistance Techniques (PAT) instructor. The SMTD trainer indicated that he was not trained or certified as a PAT instructor and was not aware of any other SMTD employee who was a certified PAT instructor.

It appears that very general instruction and training regarding the November 18, 2003, rules is provided. As noted in the “Operator Training” portion of Section IV of this report, there is no set of written material which is provided to operators during training. Also, the “Rule Book”—last revised in February 1999—does not incorporate the new rules. The bulletin detailing the policy is posted in the driver lounge area.

When asked what specific instruction is provided to new operators, the SMTD trainer responded: “I do tell them to help. I tell them to take wheelchair size into consideration.” When asked what operators are told to do if a wheelchair is too big, the trainer responded: “I am not sure.”

5.4.3 SMTD Monitoring and Enforcement

Monitoring

SMTD uses its on-board cameras as its primary means of monitoring drivers in their assistance to riders who use wheelchairs. On infrequent occasions, SMTD street supervisors may board a

bus to observe whether a driver has properly secured a rider who uses a wheelchair. Street supervisors may also observe a bus and the driver when a rider who uses a wheelchair is boarding or alighting.

The SMTD procedures for using the camera pack data for observing driver assistance to passengers (whether or not they use wheelchairs) are similar to the practices for reviewing stop announcements.

From the start of 2005 to mid-July 2005 (the time of the review team’s site visit), SMTD had a total of 197 incidents for which staff pulled the camera packs and reviewed the data. During this period, 10 of these 197 incidents were related to a user of a wheelchair boarding or alighting a bus. These 10 incidents were a combination of rider complaints and incidents reported directly from a driver to the dispatcher. After SMTD staff learn of the incident, they pull the camera pack from the bus at the end of the day. They view the recordings and transfer the relevant portions to a zip drive or CD.

The various camera positions within the bus allow the reviewer to observe the rider enter or exit the bus, maneuver to the securement area, and the driver secure the passenger and wheelchair (or other mobility device). The cameras also show the location of the driver while the rider is entering/exiting and maneuvering inside the bus. Via the on-board camera recordings, members of the FTA review team observed the 10 incidents involving riders who used wheelchairs and noted two dramatic incidents: an incident in which a user of a three-wheel scooter tipped over when trying to board the bus on the front-door ramp while the driver was waiting near the securement area; and an incident in which a user of a scooter tipped over while the bus was in motion—apparently not properly secured.

Enforcement

A five-step enforcement process, similar to that used for on-board stop announcements has been established by SMTD for driver assistance. The enforcement process was described in the bulletin that announced the establishment of the driver assistance policy (see Attachment I). The policy calls for the following disciplinary actions to be taken:

First Offense	Warning Letter
Second Offense	One-Day Suspension Without Pay
Third Offense	Two -Day Suspension Without Pay
Fourth Offense	Three-Day Suspension Without Pay
Fifth Offense	Termination

As of the date of the on-site review, SMTD staff indicated that they had not taken any disciplinary action against any operators related to the driver assistance policy.

5.4.4 Bus Operator and Dispatcher Interviews

The 10 SMTD bus operators interviewed during the on-site visit were asked several questions related to passenger assistance, wheelchair securement, and training. Following is a summary of the information collected in these interviews.

Interview questions included:

“What types of assistance do you provide to riders who use wheelchairs in boarding and exiting the bus?”

“Are there any circumstances when you are not able to assist a rider who uses a wheelchair in getting up or down the ramp on one of the low-floor, ramp-equipped buses?”

Responses varied significantly. Four operators indicated that they will provide assistance to riders getting on and off lifts and up and down ramps—whatever is needed.

One operator indicated that he wants to help, but knows that some riders don't like to be touched so he waits to be asked.

Another operator also indicated that he waits to be asked and added, “Otherwise, drivers are not obligated to help riders up and down the ramps.”

One operator responded, “I am not sure if it is company policy. I visually guide people. Most have power wheelchairs. I would help people with manual wheelchairs.”

Another operator said “On ramp buses, I kneel the bus but typically do not help people up or down the ramp. I am concerned about getting hurt.” When asked about agency policy, this operator said there were mixed messages given about what operators should do and added, “I don't know about pushing people up the ramp.”

Two other operators also were somewhat unsure about the formal policy and indicated that concerns about drivers getting hurt assisting people up and down the ramps had been communicated to them.

Most operators indicated that they felt that they had been adequately trained on how to use the securement systems. Several noted the recent training by the Springfield Center for Independent Living (SCIL) and mentioned that the training they received included using a wheelchair and being boarded and secured so they could get an understanding from the riders' perspective. One operator said use of the securement system was not adequately addressed in initial training and they learned this only when the SCIL training was provided. A second operator said that the instruction did not cover the equipment on all of the types of buses, and that it would have been better if each type of securement system were explained.

Four operators indicated that they typically only use the passenger restraint system, not the wheelchair securement system and the passenger restraint system, when securing riders who use wheelchairs. Two said that if the rider does not want the belt around them, they loop the belt in

front of the wheelchair seat and behind the rider. One operator said, “We are trained to use the floor straps, but most drivers just use the seat belts.”

In general, operators did not indicate that they encountered significant problems in service. A few drivers noted that they had experienced occasional problems with wide or very large wheelchairs. They indicated that most issues were related to maneuvering once on the bus rather than with getting on or off of the bus. Two drivers also said that if they find the slope is too steep at a stop they will try to move to a better spot that lessens the slope. One operator also noted that sometimes it is difficult to know if someone is waiting at the stop because riders who use wheelchairs will sometimes wait near the stop but not right at the stop.

The review team also interviewed two of the fixed route dispatchers. Both were asked about situations where drivers were radioing in and indicating that they could not board a rider. Both indicated that this was not an issue and they were not aware of the last time this happened. Both indicated that the majority of the communications from operators regarding riders who use wheelchairs are related to riders with wheelchairs that are too big to fit on the lift or ramp or in the securement area. They indicated that two road supervisors are typically available throughout the day and if issues are raised by operators, one of the road supervisors will be sent to assist.

5.4.5 Review Team First-Hand Observations

During the two days that the review team members were riding the fixed route system, they observed five boardings or alightings by riders using wheelchairs. In three cases, the buses were ramp-equipped, and in the other two cases the buses were lift-equipped. All boardings and alightings were successful. In the two cases where lift buses were used, one rider used a manual wheelchair and the other used a powered wheelchair. Both were able to maneuver onto the lift and enter and exit the buses without driver assistance. In the three ramp boardings, one person was using a powered wheelchair and exited the bus on her own. A second rider used a manual wheelchair and was traveling with a companion who helped push her up the ramp and onto the bus. In the third case, the rider was using a manual wheelchair and approached the ramp on her own. She appeared to have difficulty propelling the wheelchair and getting up the ramp. Another passenger at the stop stepped-in and helped her get up the ramp. As he was pushing her up the ramp, he did not line the rear wheels up properly and one wheel was not on the ramp as he started to push her up. Other passengers called out to alert him and he backed the wheelchair down, realigned it and then completed the boarding process.

During two of the low-floor (ramp) bus boardings, including the one described above where a waiting passenger stepped-in to help, it was observed that the operators would deploy the ramp and then walk back to the securement area where they would wait for the rider. They were not in the immediate boarding area to observe and supervise the boarding process.

In two cases where the reviewer were also on board the buses and could observe the wheelchair securement process, they saw that both drivers only used the passenger restraint systems. In one case, the seat belt and shoulder harness was placed around both the rider and the wheelchair. In the second case, the seat belt and shoulder harness was looped in front of the wheelchair seat and behind the rider.

First-hand observations indicated that bus kneelers are regularly used. The kneeling feature was activated several times for riders who were using canes or crutches or where riders were elderly and appeared frail. This appeared to be done without riders specifically asking and where the operator either noted that the rider would benefit from having the bus knelt or perhaps where the operator was familiar with the rider and knew the kneeler would be helpful. The kneelers were also used in all three low-floor bus boardings.

Review of Incident Tapes

The review team also scanned dispatch logs from December 2003 through July 19, 2005. Twelve incidents were identified from the logs where some issue related to the lift, ramp, or rider using a wheelchair was indicated. For each incident, the review team recorded the bus number, date, time, and operator.

The information from the dispatch logs was then used, with SMTD staff assistance, to attempt to locate video records of these incidents. Video files were able to be located for five of the incidents. The videos were then viewed with SMTD service monitoring staff. A summary of the incidents and video record is provided below.

Incident #1742, April 16, 2005, Bus #2005: The passenger was using a three-wheeled scooter and was seated in the securement area. As the bus went around a corner, the passenger and scooter tipped over into the aisle. The driver stopped the bus and righted the scooter. The video indicated that only the shoulder harness and seatbelt was used to secure the rider and wheelchair. No floor-mounted straps were used. Because the seatbelt and shoulder harness lock in place only if pulled quickly, they provided no securement as the rider was slowly tipping over.

Incident #1574, October 30, 2004, Bus #2008: The operator deployed the ramp at a stop to board a rider who was using a three-wheeled scooter. The berm of the road at the stop appeared to slope away from the bus and the ramp, making the ramp steeper than it would be on level ground. Once the ramp was deployed, the operator went back and stood in the securement area. He was not in the immediate boarding area to supervise the boarding process. The passenger made three attempts to board the bus. On the third attempt, the rider appeared to power forward with extra speed, the front of the scooter lifted up in the air, and the scooter and rider tipped over backwards.

Incident #1565, October 22, 2004, Bus #8964: The video showed the operator attempting to deploy the bus lift without success. She is then observed telling the waiting rider that the lift does not work. The driver then departs and does not appear to notify dispatch. The rider apparently reported the incident and the dispatch log notes, "Driver told passenger lift didn't work. It did."

Incident #1535, October 1, 2004, Bus #2009: The video showed the rider maneuvering in the securement area. The rider was using a three-wheeled scooter and was attempting to turn around to get into a forward-facing orientation in the securement area. The side of the scooter brushed up against the side of the wheelwell housing, which caused the scooter and rider to tip over

sideways. It did not appear in this instance that there was anything the driver could have done differently to avoid this incident.

Incident #1483, August 13, 2004, Bus #8980: The video began showing the rider in the securement area as the bus was in motion. The bus went around a corner and the rider tipped over into the aisle. The rider and scooter appeared to be secured only with the passenger seatbelt and shoulder harness. A copy of the “Report of Accident or Unusual Occurrence” completed by the operator is provided in Attachment K. On the second page of this report, the operator wrote, “Either seatbelt did not hold or he reached down and unstrapped himself...this is a ongoing problem that needs attention, I know I strapped him in when he fell over...” The video tape did not show the rider unstrapping the belt. It was in place across the rider when he fell over. Again, because the seatbelt is designed to “give” if pulled slowly, the gradual motion of the rider slowly tipping over did not cause the belt to lock and allowed the person and scooter to tip over.

5.5 Findings

1. Since November 2003, SMTD has had a policy regarding bus operator assistance in accordance with Section 37.165(f) of the DOT regulations implementing the ADA. However, SMTD drivers and other staff have inconsistent interpretations of the new policy. Even the SMTD trainer did not appear to be clear on what specific guidance is given to bus operators regarding assisting riders with large wheelchairs. Four of the 10 drivers interviewed had inconsistent interpretations of the new policy or indicated they were not clear what was specifically required.
2. Bus operator interviews and team member observations also indicated that it is common practice for drivers to secure riders who use wheelchairs with only the passenger seatbelt and shoulder harness. The DOT ADA regulations at 49 C.F.R. § 38.23(d)(7) states that seat belts and shoulder harnesses shall not be used in lieu of a device which secures the wheelchair or mobility aid itself. SMTD has video documentation of several instances where riders—particularly riders using scooters—tipped over during transport. The seatbelt and shoulder harness do not provide adequate securement.

5.6 Recommendations

1. SMTD should provide additional training to drivers on the new driver assistance policy. This training should provide specific guidance on interpreting the policy in various circumstances.
2. It is recommended that SMTD instruct bus operators to exit the bus and stand near the ramp when boarding riders using the low-floor, ramp-equipped buses. This will allow the bus operator to better determine if the rider needs assistance and to provide the assistance needed. In the absence of thorough training, bus operators appear to have developed their own interpretations of the driver assistance policy. One common interpretation of the driver assistance policy appears to be that assistance in pushing a rider using a wheelchair up a ramp is only to be provided if requested. Section 37.165(f) of DOT’s ADA regulations states that assistance is to be provided “Where necessary or upon request...” Unsafe situations are

likely to occur when passengers using wheelchairs cannot independently wheel themselves up a ramp, but do not request assistance. During the site visit, a team member observed one such instance.

3. SMTD should instruct drivers to proactively ask if a rider needs assistance if they observe riders having difficulty independently using the ramp or lift. While drivers should not take hold of a wheelchair and start providing assistance without asking, it would be appropriate to offer assistance if significant difficulty is observed.
4. SMTD should immediately instruct all bus operators to use the floor-mounted wheelchair securement systems to secure riders who use wheelchairs. SMTD trainers should clearly explain to bus operators that the seat belts and shoulder harnesses do not provide adequate securement and are not designed to secure wheelchairs.
5. SMTD should monitor compliance with the driver assistance policy and closely monitor proper securement of wheelchairs and riders as part of its overall service monitoring program.

ATTACHMENT A

ON-SITE ASSESSMENT SCHEDULE

**Assessment of ADA Stop Announcements, Springfield Mass Transit District, Springfield, IL
July 18-21, 2005**

On-Site Assessment Schedule and Assignments

Reviewer	Day 1 (7/18/05)	Day 2 (7/19/05)	Day 3 (7/20/05)	Day 4 (7/21/05)
All Reviewers	<p>All Day: Ride selected routes and record stop announcements</p> <p>Check for ID system at transfer points.</p>	<p>All Day: Ride selected routes and record announcements. At transfer points during the day, record ID system.</p> <p>Call SMTD to arrange meetings on Wednesday and Thursday.</p>	<p>9 AM: Opening Call.</p> <p>9:30 AM: Meet with General Manager. Meet with Operations Manager to review notices, internal monitoring, corrective actions, complaint handling, etc.</p>	<p>8 AM: Team meeting to tabulate observations and prepare for exit conference.</p> <p>10 AM: Exit conference</p>
Russell Thatcher			<p>11:00 AM: Interview dispatchers and check dispatch logs for assistance issues.</p> <p>1 PM: Meet with trainer to discuss training and re-training.</p> <p>Interview drivers.</p> <p>Examine PA daily inspection and maintenance records.</p>	
David Chia			<p>11:00 AM: Review Complaints at SMTD</p> <p>1 PM: Review "camera packs" (on-board films).</p> <p>Interview Drivers.</p>	

ATTACHMENT B

SMTD RESPONSE TO DRAFT REPORT



SPRINGFIELD MASS TRANSIT DISTRICT

December 2, 2011

Mr. John R. Day
ADA Team Leader
FTA Office of Civil Rights
1200 New Jersey Avenue S.E.
Washington, DC 20590

Dear Mr. Day:

I am writing in response to your letter we received November 22, 2011 regarding the open ADA review process of the Springfield Mass Transit District (SMTD), which began July 2005.

We have reviewed the draft report of your findings and recommendations, from that period, and did not find statements that we would deem to be incorrect. This report was originally reviewed by my predecessor, Mr. Richard Fix and Ms. Angela Brooks, Superintendent of Transportation. Ms. Brooks is still with us and believes the report accurately reflects the discussions during the meeting she attended with Mr. Fix and members of the FTA review team.

Ms. Brooks has confirmed that all corrective actions that were identified in the SMTD response have been made, including the random viewing of video for the specific purpose of checking for street announcements. We would also like to make you aware of additional steps that have been taken to ensure that the service we provide is in compliance with the ADA regulations.

Since this review, all SMTD Driver Trainers have attended the Transportation Safety Institute's "Instructors Course in Bus Operator Training." A new trainer is scheduled for this class in January 2012. The SMTD uses the materials provided from this course as the primary source of instruction for classroom training with new operators. The classroom training for ADA is supplemented with field training in loading and securing wheelchairs and providing additional assistance to passengers with disabilities.

SMTD also conducts periodic "sensitivity training" on many disabilities for all drivers with the assistance of the Springfield Center for Independent Living. This training was last conducted in November 2010 and will be scheduled again in 2012.

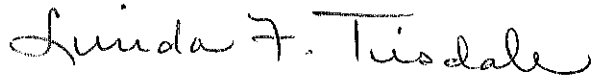
Mr. John R. Day

2

December 2, 2011

We look forward to the completion of the process and will be happy to provide additional information as requested. We appreciate the opportunity to review the report and to provide updated information.

Sincerely,

A handwritten signature in cursive script that reads "Linda F. Tisdale".

Linda F. Tisdale
Managing Director

copy: Angela Brooks
file

ATTACHMENT C

**SMTD NOTICES, MEMORANDA AND BULLETINS
REGARDING ON-BOARD STOP ANNOUNCEMENT
POLICIES**

STREET CALLING GUIDELINES

1. USING THE MICROPHONE IS OPTIONAL IF YOU CAN CALL THE STREETS OUT LOUDLY.

(see "New Policy" 11/1/04)

2. YOU MUST CALL THE MINIMUM LISTED BUT NOT NECESSARILY THE SAME ONES LISTED.

3. SCHOOL TRIPPER STREETS NEED NOT BE CALLED UNLESS THE BUS TRAVELS ALONG A REGULAR LINE ROUTE. (E.G. EAST COOK STREET HELPER)

4. STREETS NEED NOT BE CALLED IF NO ONE IS ON THE BUS.

5. STREETS MUST BE CALLED IF THERE IS ONLY ONE PERSON ON THE BUS, EVEN IF YOU KNOW WHERE THIS PERSON DEBOARDS.

6. CALL MAJOR INTERSECTIONS AND MAJOR DESTINATIONS. (E.G. MEMORIAL MEDICAL CENTER)

EXHIBIT 4

NEW POLICY

Calling of Streets

Effective November 1, 2004, it will be mandatory that the microphone be used by all drivers at all times when calling streets. It has come to our attention, in a formal complaint filed with the Federal Transit Administration, that some drivers' voices do not carry and passengers cannot hear the streets they are calling. This policy is being established to ensure compliance with the Americans with Disabilities Act.



Richard E. Fix
Managing Director



Michael S. Warden
President, A.T.U. Local
1249

STOP ANNOUNCEMENTS

OUTBOUND

INBOUND

Route 1 - North 5th

1. 6TH & Carpenter
2. 6th and North Grand
3. 6th and Eastman
4. 8th and Sangamon

1. 5th and Eastman
2. 5th and North Grand
3. 5th and Washington
4. TRANSFER CENTER

Route 1- South 5th

1. 5th and South Grand
2. 5th and Laurel
3. 6th and Ash
4. 10th and Stanford

1. 6th and Stanford
2. 6th and Ash
3. 6th and S. Grand
4. 6th and Cook
5. TRANSFER CENTER

Route 2 - North 9th

1. 9th and Jefferson
2. 9th and North Grand
3. 11th and Sangamon
4. 19th and Sangamon
5. WALMART

1. Black and Stonehenge
2. 19th and Ridgely
3. 19th and Sangamon
4. 9th and N. Grand
5. 5th and Washington
6. TRANSFER CENTER

Route 3 - Bergen Park (A.M.)

1. 11TH and Washington
2. M.L.K. and Adams
3. Clearlake and Milton
4. Stephenson and North Grand

1. 15th and Carpenter
2. 11th and Jefferson
3. TRANSFER CENTER

Route 3 - Bergen Park (P.M.)

1. 11th and Washington
2. 11th and Carpenter
3. 19th and North Grand
4. Milton and N. Grand

1. Milton and Clearlake
2. M.L.K. and Adams
3. 11th and Jefferson
4. TRANSFER CENTER

STOP ANNOUNCEMENTS

page 2 of 5

OUTBOUND

INBOUND

Route 4 - W. Jefferson

1. 4th and Jefferson
2. Lewis and Jefferson
3. Walnut and Jefferson
4. Jefferson and Amos
5. Mesa and Emporia

1. Jefferson and Bruns Lane
2. Jefferson and Amos
3. Lewis and Jefferson
4. 5th and Washington
5. TRANSFER CENTER

Route 5 - South 15th

1. 11th and Cook
2. 11th and South Grand
3. 11th and Ash
4. 14th and Lenox

1. 15th and Ash
2. Loveland and S. Grand
3. 13th and Capitol
4. TRANSFER CENTER

Route 5 - N. Walnut

1. 4th and Jefferson
2. Memorial Medical Center
3. Rutledge and North Grand
4. Lincoln and North Grand

1. Walnut and Carpenter
2. 1st and Madison
3. 5th and Washington
4. TRANSFER CENTER

Route 6 - Colony West

1. 2nd and Adams
2. MacArthur and South Grand
3. MacArthur and Outer Park
4. Iles and Chatham
5. Wabash and Montvale
6. WHITE OAKS MALL

1. Wabash and Robinhood
2. Iles and Montvale
3. MacArthur and Outer Park
4. MacArthur and South Grand
5. 2nd and Monroe
6. TRANSFER CENTER

OUTBOUNDINBOUND

Route 6 - East Cook

1. 11th and Cook
2. M.L.K. and Cook
3. Pope and South Grand
4. Ash and Greentree

1. 23rd and Cook
2. M.L.K. and Cook
3. 11th and Cook
4. TRANSFER CENTER

Route 7S South State

1. 2nd and South Grand
2. Outer Park and MacArthur
3. Wabash and Chatham Road
4. Seven Pines and Gaines Mill
5. TARGET

1. WHITE OAKS MALL
2. Durkin and Lawrence
3. Fairhills Mall
4. MacArthur and Washington
5. Lewis and Washington
6. 5th and Washington
7. TRANSFER CENTER

7W West Washington

1. Washington and Walnut
2. FAIRHILLS MALL
3. WHITE OAKS MALL
4. WALMART

1. Wabash and Chatham
2. Outer Park and MacArthur
3. 2nd and South Grand
4. 2nd and Cook
5. TRANSFER CENTER

Route 8 Lowell Avenue

1. 7th and South Grand
2. 6th and Laurel
3. 2nd and Laurel
4. College and Lenox

1. 2nd and Laurel
2. 9th and South Grand
3. 9th and Cook
4. TRANSFER CENTER

Route 8 W Governor

1. Walnut and Monroe
2. MacArthur and Governor
3. Lawrence and Feldkamp

1. Lawrence and MacArthur
2. Walnut and Monroe
3. College and Monroe
4. TRANSFER CENTER

STOP ANNOUNCEMENTS

page 4 of 5

OUTBOUND

INBOUND

Route 9 Martin Luther King

1. 15th and Monroe
2. Cook and M.L.K.
3. South Grand and M.L.K.
4. M.L.K. and Cornell

1. South Grand and M.L.K.
2. Cook and M.L.K.
3. 15th and Monroe
4. 9th and Adams
5. TRANSFER CENTER

Route 9 Noble

1. Adams and College
2. Lawrence and Walnut
3. South Grand and MacArthur
4. Bates and Ash

1. South Grand and MacArthur
2. South Grand and Walnut
3. College and Monroe
4. TRANSFER CENTER

Route 10 Southernview

1. 5th and South Grand
2. 5th and Ash
3. 5th and Stanford
4. Stanton and Stevenson
5. CAPITOL CITY SHOPPING CENTER

1. Stevenson and Taylor
2. 6th and Stanford
3. 6th and Ash
4. 4th and South Grand
5. 4th and Cook
6. TRANSFER CENTER

Route 11 UIS/LLCC-Doctors Hospital

1. 11th and South Grand
2. South Grand and M.L.K.
3. Pope and South Grand
4. Taylor and Stevenson
5. U.I.S.
6. L.L.C.C.
7. DOCTORS HOSPITAL

1. L.L.C.C.
2. U.I.S.
3. Taylor and Stevenson
4. Pope and South Grand
5. M.L.K. and South Grand
6. 6th and South Grand
7. TRANSFER CENTER

STOP ANNOUNCEMENTS

page 5 of 5

OUTBOUND

INBOUND

Route 12 COUNTRY CLUB

1. Monroe and Walnut
2. Monroe and MacArthur
3. FAIRHILLS MALL
4. Dickinson and Lawrence
5. WHITE OAKS MALL

1. Dickinson & Lawrence
2. Fairhills Mall
3. Monroe & MacArthur
4. Monroe & Walnut
5. 2nd & Monroe
6. TRANSFER CENTER

Route 12 Knox Knolls

1. Monroe and Walnut
2. Monroe and MacArthur
3. FAIRHILLS MALL
4. Cramner and Whitefield

1. FAIRHILLS MALL
2. Monroe and MacArthur
3. Monroe and Walnut
4. TRANSFER CENTER

ATTACHMENT D

**COVER AND TABLE OF CONTENTS OF SMTD'S
"RULE BOOK FOR OPERATORS AND MAINTENANCE
PERSONNEL"**

Ron
RULE BOOK

FOR

OPERATOR'S AND MAINTENANCE PERSONNEL

This book has been updated and all rules herein are
effective:

February 16, 1999

SPRINGFIELD MASS TRANSIT DISTRICT

928 South Ninth Street

Springfield, Illinois 62703-2497

(217) 522-5531

**RULE BOOK
TABLE OF CONTENTS**

	PAGE
PREFACE	4
I. REQUIREMENTS	
Driver's License	5
Medical Certification Card	5
Telephone and Watch Requirements	5
Uniforms	5
II. DUTIES IN OPERATING SMTD BUS	
Preparatory Time	6
Turn-In Time	6
Fare Collections	6
Handling of Fares	6
Transfers	7
Defect Cards	7
Work Schedule Changes	7
Overtime	7
Destination Signs and Route Completion	7
Pre-Trip Checklist	8
Early Departure from Garage	8
Unauthorized Use of Buses	8
Relief Points	9
Leaving Buses Unattended	9
Buses Unattended and Unsecured	9
Backing Buses	9
Accidents and Breakdowns	9
Accidents With Personal Injury	10
Suspension Due to Post-accident/ Reasonable Suspicion Drug/ Alcohol Testing	10
Return to Board After Penalty	10

PAGE

III. RESPONSIBILITY TO PASSENGERS

Employee Bus Passes 11
I.D. Cards 11
Old Punch Passes and Tokens 11
Ride-Around Policy 11
Non-Authorized Riders 12
Non-Restrictive Ridership 12

IV. ABSENCES FROM WORK

Absenteeism 12
Reporting Illness 13
Request for Time Off 14

V. SAFETY RULES

Wheelchair Restraints 14
Safety Belts 14
Firearms 14
Eating and/or Drinking
While on Duty 15
Horseplay 15
Interior Lights 15
Railroad Crossings 15

VI. MISCELLANEOUS

No-Smoking Policy 15
Electronic Devices 16
Pay Policy 16
Profanity 16
Radio Recordings 17
SMTD Telephones 17
Personal Use of SMTD Property 17
Courtesy Stops 18

ATTACHMENT E

**SAMPLE “OPERATOR’S CALLING STREETS”
MONITORING FORM**

Original to Unge
7-15-05

OPERATOR'S CALLING STREETS

NAME: Lisa Bankhead

DATE: 7-15-05

VIAR NUMBER: 1852

BUS NUMBER: 0306 RUN NUMBER 152

TIME VIEWED: 2:25 - 2:49

#1: Jefferson & 9th 2:28:27 Called

#2: 9th & N. Grand 2:31:20 NO CALL

#3: 11th & Sangamon 2:35:47 NO CALL

#4: 9th & Sangamon 2:38:18 NO CALL

#5: Walmart 2:45:21 NO CALL

#6: _____

DRIVER CALLED TRANSFER CENTER:

Y

N

N/A

COMMENTS: only heard one
Call

ATTACHMENT F

**SMTD'S PROGRESSIVE DISCIPLINARY POLICY
REGARDING STOP ANNOUNCEMENTS AND A
SUMMARY OF ACTIONS TAKEN FROM FEBRUARY
2002 THROUGH NOVEMBER 2004**

OPERATORS

EFFECTIVE MONDAY FEBRUARY 25, 2002

THE INSPECTORS WERE HERE DURING THE MONTH OF NOVEMBER 2001. ONLY TWO OUT OF THE THIRTY OPERATORS WHO WERE INSPECTED WERE CALLING THE STREETS. YOU HAVE BEEN INFORMED WITH POSTED NOTICE AND VIA RADIO THAT THIS IS A FEDERALLY MANDATED LAW AND A LAWSUIT IS IMMINENT WITHOUT CORRECTIVE ACTION. THEREFORE, MANAGEMENT HAS SET FORTH THE FOLLOWING PROGRESSIVE DISCIPLINE FOR FAILURE TO CALL THE STREETS.

- | | |
|--------------------|------------------------------------|
| 1ST OFFENSE | WARNING LETTER |
| 2ND OFFENSE | ONE DAY/NO PAY SUSPENSION |
| 3RD OFFENSE | TWO DAY/NO PAY SUSPENSION |
| 4TH OFFENSE | THREE DAY/NO PAY SUSPENSION |
| 5TH OFFENSE | TERMINATION |

DISCIPLINARY ACTIONS FOR FAILURE TO **CALL STOPS**

February 2002 through November 2004

Written Warnings

March 6, 2002
March 20, 2002
May 3, 2002
May 3, 2002
May 21, 2002
June 19, 2002
September 26, 2002
October 10, 2002
November 19, 2002
November 21, 2002
January 17, 2003
January 17, 2003
January 30, 2003
August 11, 2003
September 22, 2003

Suspensions

September 30, 2002
January 31, 2003
March 4, 2004
April 2, 2004
July 1, 2004

ATTACHMENT G

DRIVER INTERVIEW FORM

Fixed Route Driver Interview Form

Agency: Springfield Mass Transit District

Employee Name: _____

Place and Date of Interview: _____

Reviewer: _____

1. How long have you been a bus operator?

2. When do you do on-board stop announcements?

What would you do if a rider asked you to announce a stop that is not on the list?

3. Do you use the PA system when making on-board stop announcements?

4. In your experience, are the PA systems typically working?

What do you do if the PA is not working?

Do you check at the beginning of each shift to see if the PA is working?

5. Do you feel you have all of the information and equipment (lists, PA, etc.) you need to be able to make on-board announcements effectively? Is there anything that would help?

Are there other issues about making on-board stop announcements?

6. Do you identify the bus and route when pulling up to stops? When?

Do you have everything you need to be able to make external announcements?

Are there any issues about making these external announcements?

7. What types of assistance do you provide to riders who use wheelchairs in boarding and exiting the bus?

Are there any circumstances when you are not able to assist a rider who uses a wheelchair in getting up or down the ramp on one of the low-floor, ramp-equipped buses? When?

(IF YES TO ABOVE, ASK) In your experience, how often are not able to assist riders up or down the ramp?

8. What training did you receive when you were first hired about assisting riders with disabilities?

In your opinion, did the training adequately prepare you to assist riders with disabilities, make stop announcements, operate the lifts/ramps and use the securement systems?

9. Are there any other issues about serving persons with disabilities that you would like to note?

ATTACHMENT H

ON-BOARD STOP ANNOUNCEMENT ASSESSMENT FORM

On-Board Fixed Route Stop Announcements Assessment Form

Transit System Name: SMTD – Springfield, IL Date: _____

Route #/Line Name: _____ Bus or Car # _____

Boarded at: _____ Disembarked at: _____

Location: _____ Location: _____

Time: _____ am / pm Time: _____ am / pm

Indicate below the stops that should be announced (transfer points, major intersections, major destinations). Source: <u>List of required stop announcements developed by SMTD</u>	Indicate Location Type			On-board Announcement Made?		External ID Announcement Made?		
				Yes	No	Yes	No	N/A
Location	Transf	Intersect	Dest	Yes	No	Yes	No	N/A

NOTE: If announcements are made, indicate whether they were made using the PA system, by voice, or by automated system: _____ PA _____ Voice _____ Auto
 Announcements Clear/Audible? _____ Yes _____ No _____ Sometimes
 Were other stops/locations called? _____ Yes _____ No

Notes: _____

Signature and Name: _____ (rev. 07/15/02)

ATTACHMENT I

**SMTD POLICY REGARDING BUS/ROUTE
IDENTIFICATION**



RULE BOOK

STREET ANNOUNCEMENTS

Upon leaving the downtown transfer center each operator will announce the destination of his or her route. Operators will also announce street names where routes cross or where two routes traveling the same route separate.

Effective 05-17-00

ATTACHMENT J

SMTD POLICY REGARDING DRIVER ASSISTANCE

OPERATORS

EFFECTIVE: NOVEMBER 18, 2003

PLEASE BE ADVISED THAT THE FEDERAL RULES IN REGARD TO THE AMERICANS WITH DISABILITIES ACT REQUIRE THAT:

“WHERE NECESSARY OR UPON REQUEST, THE ENTITY’S PERSONNEL SHALL ASSIST INDIVIDUALS WITH DISABILITIES WITH THE USE OF SECUREMENT SYSTEMS, RAMPS AND LIFTS. IF IT IS NECESSARY FOR THE PERSONNEL TO LEAVE THEIR SEATS TO PROVIDE THIS ASSISTANCE, THEY SHALL DO SO.”

THE REQUIREMENT OF OPERATOR ASSISTANCE IS A FEDERAL MANDATE WHICH THE DISTRICT INTENDS TO HONOR. FURTHER, THE DISTRICT HAS EVERY REASON TO BELIEVE THAT THE OPERATORS ARE MORE THAN WILLING TO COOPERATE WITH THIS FEDERAL MANDATE. HOWEVER, IN ORDER TO INDICATE THE DISTRICT’S INTENT TO COMPLY WITH THESE PROVISIONS, THE DISTRICT HAS ADOPTED THE FOLLOWING RULE. FAILURE TO COMPLY WITH THIS RULE WILL RESULT IN DISCIPLINE AS FOLLOWS:

1ST OFFENSE
2ND OFFENSE
3RD OFFENSE
4TH OFFENSE
5TH OFFENSE

WARNING LETTER
ONE DAY/NO PAY SUSPENSION
TWO DAY/NO PAY SUSPENSION
THREE DAY/NO PAY SUSPENSION
TERMINATION

1. THE KNEELING DEVICE ON ALL BUSES SHOULD BE USED WHENEVER A RAMP IS DEPLOYED, UPON REQUEST OF ANY PERSON, AND AT SUCH TIMES AS THE OPERATOR BELIEVES THAT USE OF THE KNEELING FEATURE ON A BUS IS NECESSARY. THERE WILL BE NO RESTRICTIONS ON THE USE OF THE KNEELING FEATURE OF THE BUS BASED UPON WEATHER CONDITIONS.

2. OPERATORS SHOULD LEAVE THEIR SEATS FOR THE PURPOSE OF ASSISTING INDIVIDUALS WITH DISABILITIES IN THE USE OF SECUREMENT SYSTEMS, RAMPS OR LIFTS. HOWEVER, THE OPERATOR SHOULD ENGAGE THE EMERGENCY BRAKE AND TAKE THE BUS OUT OF GEAR PRIOR TO LEAVING HIS/HER SEAT.

3. REASONABLE OPERATOR ASSISTANCE SHOULD BE PROVIDED TO INDIVIDUALS WITH DISABILITIES NEEDING ASSISTANCE TO ACCESS THE BUS VIA A RAMP. REASONABLE ASSISTANCE MIGHT INCLUDE GUIDING A WHEELCHAIR TO PROVIDE BALANCE TO THE OCCUPANT OF THE CHAIR OR ASSISTING IN PUSHING A WHEELCHAIR UP A RAMP. ASSISTING IN THE PUSHING OF A WHEELCHAIR, WHETHER ELECTRIC OR MANUAL, UP A RAMP SHOULD BE PROVIDED BY THE OPERATOR UPON REQUEST, IF THE OPERATOR IS ABLE. FACTORS THAT WOULD GO INTO THE DETERMINATION OF WHETHER AN OPERATOR IS ABLE TO ASSIST IN PUSHING THAT WHEELCHAIR UP THE RAMP WOULD INCLUDE THE TOTAL WEIGHT AND SIZE OF THE WHEELCHAIR AND OCCUPANT, THE PHYSICAL STATURE OF THE OPERATOR, THE STEEPNESS OF THE RAMP, AND ANY LIMITING PHYSICAL CONDITIONS THAT AN OPERATOR MAY HAVE.

4. **IF ANY OPERATOR CANNOT PROVIDE THE NEEDED ASSISTANCE TO AN INDIVIDUAL WITH DISABILITIES TO ENTER THE BUS, THE OPERATOR SHALL ADVISE THAT PERSON AND IMMEDIATELY CALL DISPATCH BEFORE LEAVING THE STOP TO ADVISE DISPATCH OF THE SITUATION.**

5. **IF AN OPERATOR BELIEVES THAT HE/SHE WILL NEVER BE ABLE TO PROVIDE ASSISTANCE IN PUSHING A WHEELCHAIR UP A RAMP BECAUSE OF HIS/HER PHYSICAL STATURE OR ANY PHYSICAL LIMITATIONS, HE/SHE SHOULD ADVISE THE DISTRICT IMMEDIATELY OF THAT SITUATION.**

6. **THE ONLY OPERATOR ASSISTANCE TO BE PROVIDED UNDER THIS RULE IS OPERATOR ASSISTANCE REQUIRED IN ENTERING OR EXITING THE BUS OR IN USING THE SECUREMENT SYSTEM ON THE BUS. OPERATOR ASSISTANCE IN TRANSPORTING OR MOVING AN INDIVIDUAL WITH A DISABILITY TO OTHER LOCATIONS OUTSIDE OF THE VEHICLE IS NOT REQUIRED OR APPROPRIATE.**

ATTACHMENT K

**COPY OF "REPORT OF ACCIDENT OR UNUSUAL
OCCURRENCE" FORM DATED AUGUST 4, 2004**

REPORT OF ACCIDENT OR UNUSUAL OCCURRENCE

No. 08-04-04

Company SPRIFID MASS TRANSIT City SPRINGFIELD State IL
 Line _____ Run No. 184 Bus No. 8980 Time 3:00 AM Date 8-13-04
 Location DOCTOR'S HOSPITAL No. of Passengers 5 No. of Observers 5
 Operator DANIEL WAHL Age 44 Length of Service with Co. 10 months Chauffeurs Lic. W400726-0163
 Address #3 PRAIRIE LN CT. City SPRINGFIELD State IL
 TYPE: Traffic Passenger Pedestrian Observation Miscellaneous
 CONDITION OF STREET: Dry Wet Ice Snow Level Upgrade Curve

TRAFFIC ACCIDENT

COMPANY VEHICLE: How far from point of accident when other vehicle or pedestrian was first seen? _____ Ft. Estimate speed when danger became apparent _____ MPH. How far from collision when you applied brakes? _____ Ft. Estimate speed of your bus at time of collision _____ MPH. How far did your vehicle move after collision _____ Ft. Describe damage _____

OTHER VEHICLE OR PROPERTY:

Name of Owner _____ Address _____
 Name of Driver _____ Address _____
 Vehicle Lic. No. _____ Type Vehicle _____ No. Persons in Vehicle _____ Was other Vehicle insured _____
 Name of Company _____ Est. speed when first seen _____ MPH
 Direction _____ Speed at collision _____ MPH. Dist. traveled after collision _____ Damage _____
 Rear End Collision: Bus Following Vehicle Speed _____ MPH How far back _____ Vehicle Following Bus
 Sideswipe: Bus changing lanes Passing Other Other vehicle changing lanes Passing
 Miscellaneous Coll: Backing Stationary Object Parked Vehicle Other
 Intersection: Bus making R. turn L. turn Going straight through Other vehicle
 Collision in bus stop area: Approaching stop In stop Leaving stop
 Misc: Off road Hit hole in street Passenger ill Disturbance Ejection Other
 Were Police at Scene? _____ Was citation issued? _____ To Operator Other driver Officer's No. _____

PASSENGER ACCIDENT:

Fell boarding Alighting F. door R. door How far was step from curb? _____ Ft.
 Condition of steps: Dry Wet Ice/snow
 Fell in bus: Bus in motion? YES Starting Stopping Enroute Going straight Curve Turning
 Pass. struck by door: Front Rear Boarding Alighting Door control manual Other
 Fell near bus Before boarding After alighting How many feet from bus? _____ Ft.
 Pedestrian: At time of coll. was ped. at crosswalk? _____ Bus stop Near curb How many ft.? _____
 Jaywalking Other Misc. defective equipment Describe Either Seat Belt came undone OR PASSENGER RELEASE SEAT BELT
 Was ambulance called _____ By whom _____

PERSONS INJURED OR INVOLVED In Bus Other Vehicle Pedestrians

Name	Age	Address	Apparent Injury
(WHEEL CHAIR)		301 BRENDAN GARDEN'S	NONE
WITNESSES			
RUSSELL BARNETT		PHONE # 523-1204	
JAMES TATE		PHONE # 525-8611	
MAMA DAW		PHONE # 527-1589	
DAVID JENNINGS		PHONE # 361-1918	

Describe accident or occurrence in detail:

When pulling out of Doctor's Hospital passenger in question tip his wheel chair over either seat belt did not hold or he reached down and unstrapped himself this is a on going problem that needs attention, I know I strapped him in when he fell over I stopped bus and I asked him if he was ok he stated yes and witnesses I listed assisted me in helping passenger up we sat him in the seat and picked the chair up there was damage to his chair but he stated he was ok and no medical attention was needed I notified 911 and was on scene a few minutes later,

Date: 8-13-04 This is a true report of this accident

Samuel J. Wall
Signed - Operator

Name of Observers:

Address:

Comments by Person Interviewing Operator

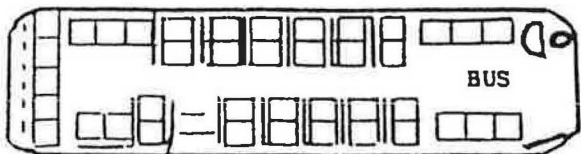
Date Interviewed

By Whom

Signed

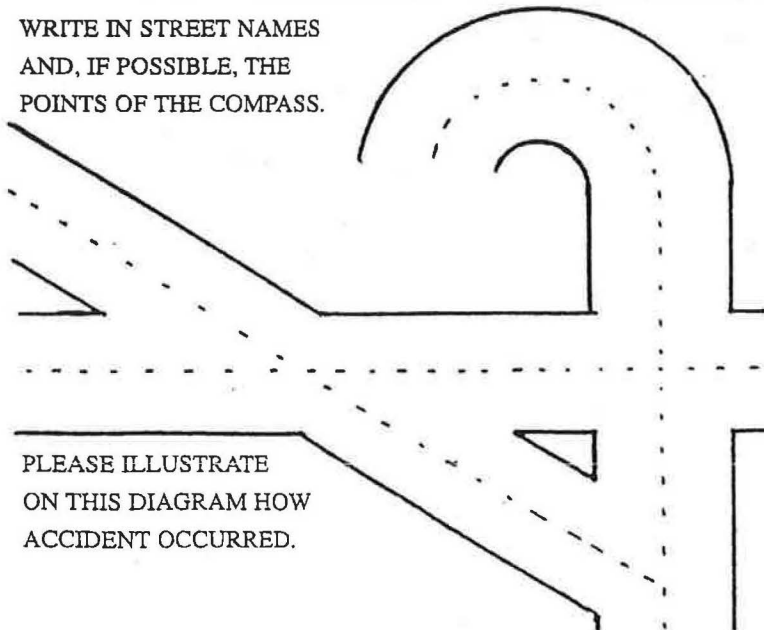
If accident is a collision with vehicle, stationary object or person, check approximate point of contact on bus below.

If it is a boarding, alighting or fell-in-bus accident, check which door or approximate location in bus below.



BE SURE TO CHECK

WRITE IN STREET NAMES AND, IF POSSIBLE, THE POINTS OF THE COMPASS.



PLEASE ILLUSTRATE ON THIS DIAGRAM HOW ACCIDENT OCCURRED.