

ABQ Ride Sun Van Compliance Assessment

Introduction

In the spring of 2010, Delta Services Group, Inc. (Delta) was commissioned to conduct an assessment of ABQ Ride's ADA paratransit service Sun Van. The assessment involved an evaluation of the system's procedures and processes, as well as a series of test rides, which were to be conducted covertly during two different observation periods. In general, we found that the Sun van service performed very well and exhibited no areas of probable non-compliance with Federal Americans with Disabilities Act (ADA) requirements. What follows is a detailed report of our findings of this effort.

Assessment Process and Scope

The assessment was broken into three segments: 1) Eligibility, 2) Reservations and Scheduling, and 3) Service Delivery. To assess these areas, an employee of Delta presented himself to ABQ Ride as an applicant for service and followed the standing process to apply for eligibility, make reservations and to finally take rides on the service. To the best of our knowledge, we do not believe that ABQ Ride staff knew the identity of the Delta tester. In no cases were any of ABQ Ride's rules changed to accommodate this assessment, with the exception of the rapid procurement of an identification card and passenger account number, to enable the tester to begin the assessment and start making rides. Delta's tester made reservations and took rides following all of the normal ABQ Ride rules.

Delta conducted 70 ride observations. These consisted of trips we booked and observations of other passengers we encountered while we were out riding the system. We made reservations for trips that generally took us east to west across the city, beginning at 6:00 AM and ending about 7:00 PM. The observations were made during two distinct observation periods; July 24-27, 2010 and September 28 through October 1, 2010. We took as many trips as possible, reserving a new trip about every 90 minutes. During our rides, we assessed on time performance, driver assistance and conduct, equipment operability and cleanliness and driver attitude. We collected data covertly as we rode and collected more than 3,700 data points during our observations and subsequent analysis.

Although we did not intend to select rides or times that in any way influenced our results, neither did we select our rides in a mathematically random fashion. Generally, the tester began his ride sequence at his hotel and planned rides taking him back and fourth across the city throughout the day. We also did not take a large enough sample of service to enable us state that our results are statistically representative of what a passenger is likely to encounter if they ride the Sun Van service. However, the strength of our results is very positive and leads us to believe that our conclusions are reasonably sound. Still, if ABQ ride desires to conduct a survey that yields scientifically valid results with statistical significance, a broader effort must be undertaken.

Regulatory Requirements:

To put this report into a useful format, we are presenting the results of the assessment in the context of the existing US Department of Transportation (USDOT) ADA regulations governing public entities providing transportation services (public transit authorities). These regulations are presented below as a reference:

Summarized from 49 CFR Part 37:

- *Paratransit is required to be provided to passengers in one of the three categories:*
 - *Category 1: passenger unable to independently board, ride, disembark and navigate the system;*
 - *Category 2: passengers could use the bus system if it were accessible but it is not; this is temporary eligibility until the bus is accessible;*
 - *Category 3: the passenger could use the bus but is unable to get to the bus stop, due to architectural or environmental barriers combined with their disability (Sec 37.123).*
- *There must be a process in place to determine eligibility and render decisions within 21 days of application (Sec. 37.125).*
- *Paratransit must be provided in accordance with the following six service criteria (Sec. 37.123):*
 - *Service Area: within ¾ mile of local bus route corridors as well as small areas surrounded by corridors and up to 1.5 miles on either side of a route in areas outside of core service areas.*
 - *Response Time: Provide reservations the day before and up to seven (7) days in advance, during normal business hours, and accept trip requests within +/- 1 hour of desired departure time.*
 - *Fares: charge no more than twice the standard, non-discounted fare for the same trip accomplished on fixed route*
 - *Trip Purpose: no restrictions regarding trip purpose.*
 - *Hours and Days of Service: paratransit must be available during the same hours and days that fixed route in the same area is available.*
 - *Capacity Constraints: no limits, restrictions or waiting lists regarding trips an individual can make and no "pattern or practice" that limits capacity (i.e. late trips, substantial denials or missed trips, excessively long trips).*

Our findings of this assessment will be presented in a manner that mirrors these regulations

Eligibility

The federal requirements for eligibility for ADA paratransit are somewhat detailed, but generally must meet the following requirements:

- *Paratransit is required to be provided to passengers in one of the three categories:*
 - *Category 1: passenger unable to independently board, ride, disembark and navigate the system;*
 - *Category 2: passengers could use the bus system if it were accessible but it is not; this is temporary eligibility until the bus is accessible;*
 - *Category 3: the passenger could use the bus but is unable to get to the bus stop, due to architectural or environmental barriers combined with their disability (Sec 37.123).*
- *There must be a process in place to determine eligibility and render decisions within 21 days of application (Sec. 37.125).*

ABQ Ride uses a paper application that must be requested by an applicant, completed and then reviewed, in person, with an ABQ Ride staff member. This in-person review is intended to allow staff to interact with the applicant, answer questions the applicant may have, and to assess the applicant's responses. The form and the process also include a medical verification that must be completed by the applicant and signed by a medical professional. The application is not accepted without this completed verification form. Following the interview, ABQ Staff make a determination of eligibility and use a standardized form letter to inform an applicant of their eligibility decision.

Assessment:

We find that the process, as described and practiced by ABQ Ride appears to be compliant with the ADA requirements. The steps of the process are clearly explained and the application is designed to assess a passenger's need for paratransit service, based on their disability related mobility impairments. ABQ Ride is aware of the decision deadlines and seems to be meeting these requirements. The regulatory compliance danger with eligibility is that applicants who ought to be eligible for service are being denied service. We do not think this is happening in Albuquerque.

Although the process is ADA compliant, we found it to be in need of significant attention and revision. Although it's very unlikely that passengers who need eligibility are being denied, we do believe that it is relatively easy to obtain eligibility and it is likely that passengers who could ride the accessible fixed route system are instead riding paratransit. The application itself is too general and does not ask applicants to describe how their mobility limitation prevents them from riding an accessible fixed route system. Also, the medical verification is of marginal use, as it merely asks a doctor to verify that an applicant has a medical condition, not whether or not that condition would prevent the applicant from riding an accessible bus. Finally, although the use of an in-person interview is excellent (and more than many systems are doing), in this case it is not being used effectively to interview the passenger about their needs and to make an honest determination of whether they truly need ADA paratransit. At the end of our interview, our tester asked if he would be eligible. He was told that there "shouldn't be any problem," even though he presented himself to the interview as a visually impaired applicant, yet exhibited very few problems navigating the office and completing paperwork. He was making his behavior intentionally obvious to see if the interviewer would notice and ask him more about his disability and how it impacted his mobility (which is the basis for ADA paratransit eligibility). She did not make such an inquiry.

The in-person assessment should be used by ABQ Ride to honestly evaluate applicants and also to educate people about the excellent and fully accessible ABQ Ride fixed route network. It did not appear that this was currently the case.

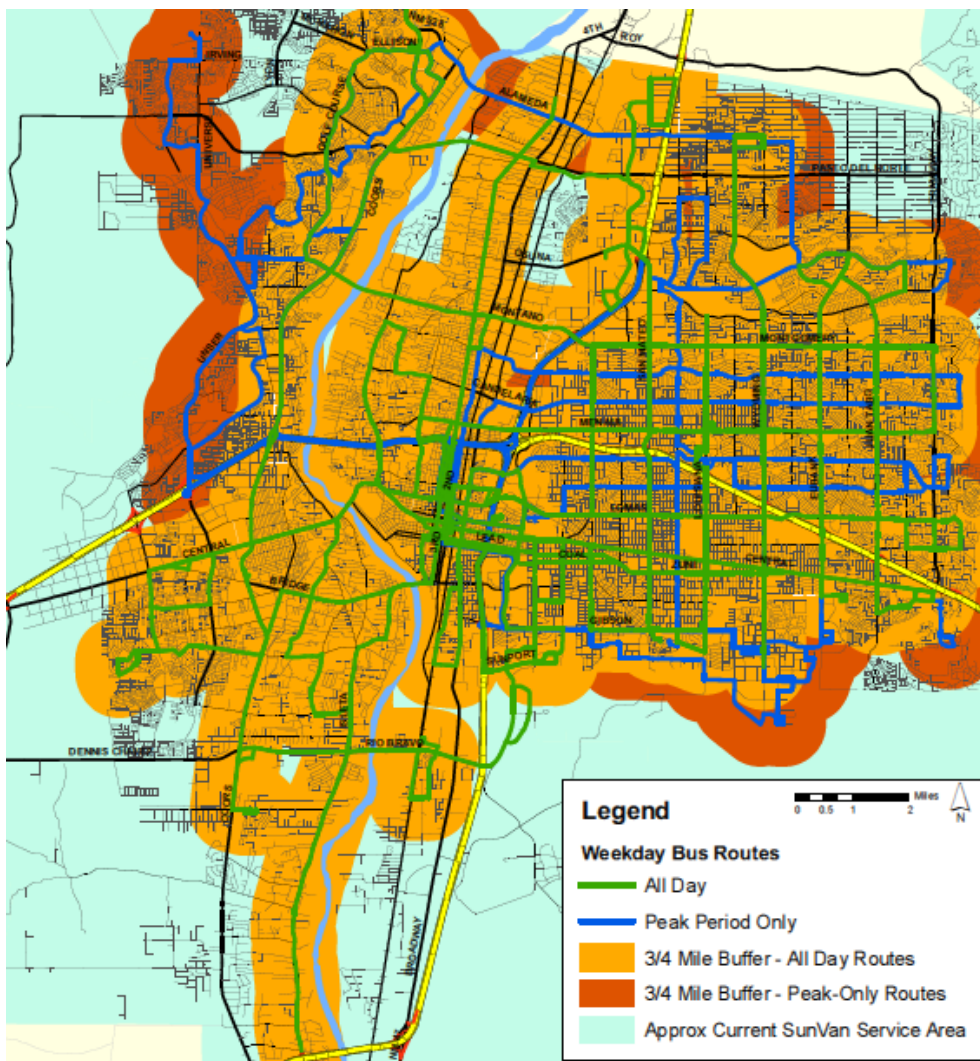
Service Area:

With regard to where ADA paratransit must be provided, the USDOT Regulations require the following:

- Service Area: within $\frac{3}{4}$ mile of local bus route corridors as well as small areas surrounded by corridors and up to 1.5 miles on either side of a route in areas outside of core service areas.

Assessment:

ABQ Ride seems to significantly exceed this requirement. As indicated by the map below, it is clear that the current Sun Van service area far exceeds the required $\frac{3}{4}$ mile service corridors.



Although we did not conduct a detailed origin and destination analysis as part of this project, it is a virtual certainty that Sun Van is providing many trips that are beyond the ADA requirements.

Response Time

Under the heading “Response Time” the ADA regulations require the following:

- *Response Time: Provide reservations the day before and up to seven (7) days in advance, during normal business hours, and accept trip requests within +/- 1 hour of desired departure time*

Within this heading, the system’s ability to receive and process reservation phone calls within a reasonable amount of time is evaluated. In other words, passengers must be able to get through on the phone to make reservations. Evaluation of this item also includes the process which is used by the system to negotiate reservation times, in the event that a requested time is not available.

Evaluation:

We found ABQ Ride to be in compliance with these requirements. Reservations are available 7 days a week from 8 AM to 5 PM for next day service. For the purpose of our test, we always made all of our reservation calls the day before our intended rides. We also made reservation calls early in the morning (between 8:00 and 10:00 AM and late in the day between 4:00 and 5:00 PM, to test the phone system during busy times. Below are some specific findings:

- On-Hold: Overall, we had little difficulty getting through on the phone to make reservations. In our 40 reservation calls, we were placed on hold only twice; once for 2 minutes and once for 3 minutes. Generally, our calls were answered within 4 rings.
- Negotiation: When making reservations, we were required to negotiate a pickup time different from that we requested 23 of 40 times or 57% of the time, However, we were never offered a time outside of the +/- 1 hour requirement. The distribution of negotiated times was as follows:

Minutes Beyond Request (+/-)	Number of Negotiated Times
At Time Requested	17 (42%)
1-10 Minutes	7 (17%)
11-20 Minutes	8 (20%)
31-30 Minutes	2 (5%)
31-45 Minutes	5 (12%)
46-59 Minutes	2 (5%)

Most of these measures were comfortably within the requirements.

We did note one phenomenon while making reservations that was not a regulatory compliance matter but was a violation of ABQ Ride policy. According to program guidelines, passengers are to make no more than 3 reservations in a single call. We were routinely able to make more than that; in one case we made 7 reservations in a single call. While this is not a problem now, it could be seen as giving callers unfair advantage if the system becomes busier. Limiting the number of trips that may be reserved helps to keep calls brief and also avoids giving passengers who use the system frequently inadvertent “head of the line” access by letting them make many reservations in a single call. The three reservations per call rule should be more strictly enforced.

Fares:

Under ADA guidelines, fares charged for paratransit must comply with the following requirement:

- *Fares: No more than twice the standard, non-discounted fare for the same trip accomplished on fixed route.*

Evaluation:

Sun Van fares are \$2.00 for each trip, which is exactly twice the standard \$1.00 bus fare. This is fully compliant. In fact, the fact that ABQ Ride sells 10-ride coupon books for \$18.00 (giving one ride for free), means that ABQ Ride is being more generous than required by the ADA.

Trip Purpose:

ADA regulations require the following with regard to trip purpose:

- *Trip Purpose: no restrictions regarding trip purpose.*

Evaluation:

Trip purpose does not factor into the ABQ reservation and scheduling process. This is as it should be with ADA paratransit and is fully compliant.

Hours and Days of Service:

ADA paratransit must adhere to the following rules governing when the service is available:

- *Hours and Days of Service: paratransit must be available during the same hours and days that fixed route in the same area is available.*

Evaluation:

As in the case of the Sun Van service area, ABQ Ride's paratransit service availability is fully compliant and is generally in excess of that provided by the bus system. Officially, paratransit service is available when fixed bus service is available. However, in practice paratransit trips are often reserved at times when no bus service is available in a particular area. Rather than scheduling service availability in different areas to coincide precisely when scheduled bus routes in the area are running, ABQ Ride has established a blanket policy of allowing rides anywhere in the service area between 5:30 AM and 10:00 PM. This is more generous than is required under the ADA.

Capacity Constraints:

By far, the area in which most transit systems have problems with ADA paratransit is in the realm of capacity constraints. Many think of this as merely the ability of the system to accommodate all ride requests. It is much more than that. According to the regulations, this area is defined as:

- *Capacity Constraints: no limits, restrictions or waiting lists regarding trips an individual can make and no "pattern or practice" that limits capacity (i.e. late trips, substantial denials or missed trips, excessively long trips).*

This measure essentially means that passengers can book trips and that they can expect to have their trips delivered on time. Of course, everyone realizes that complex systems such as paratransit operations will experience periodic problems and failures, and the regulations assume this reality. Hence, it is not a problem if a system experiences occasional lapses in any of these areas. A problem arises when passengers can routinely expect to encounter the same kind of problem on a regular basis (hence "pattern or practice").

Evaluation:

To assess this item, we conducted actual test rides of the service and also made observations of the actual reservation process in the ABQ Ride call center. Based on the information we collected through these two means, we provide our evaluation of Sun Van's compliance below:

- Waiting Lists, Restrictions or Trip Limits: We found no evidence that Sun Van has or uses waiting lists of any kind, or otherwise restricts trips passengers can book. All rides are reserved on a first come/first served basis. In the rare case where a trip cannot be scheduled because there are no available times within +/- 1 hour of the passenger's request, the trip request is accepted anyway and the ride is marked as unscheduled or "awaiting placement." This is a common practice among paratransit providers and allows the scheduler to find a spot for the ride after schedules have been further refined and optimized. Typically, passengers with unscheduled rides are notified at approximately 7:00 PM the night before their travel day of their final scheduled time. During our test rides, we experienced one unscheduled ride which was ultimately honored within 15 minutes of our requested pickup time.

- **Late Trips:** During our rides, we found the service to be generally within the “on-time” definition established by Sun Van (+/- 15 minutes of the scheduled time). A distribution of the on-time performance we observed for 41 rides (we observed a full trip of one other passenger) is as follows:

Minutes Before/After Scheduled Pickup Time	Number of Trips	Percentage
0-5 minutes	15	36%
6-10 minutes	9	22%
11-15 minutes	9	22%
16-20 minutes	6	14%
21-30 minutes	2	5%

Based on this calculation, Sun Van was late 19% of the time. This is not poor performance but it shows room for improvement.

- **Denials:** As reported earlier, we experienced no denials of trip requests.
- **Missed Trips:** During our observations, we experienced only one instance where a trip was missed. Although it was an isolated occurrence, it bears mention because of how it was handled. The trip was a return from the food court at the Coronado Mall. Originally, the trip was booked as a drop off at the Menaul entrance. Once on the vehicle, our observer was told that Sun Van no longer served that stop (if this was the case, the booking should not have been permitted by the reservationist). Our observer instead asked to be taken to the food court. The driver called in this change to the dispatcher. However, when it was time for the ride home, no bus ever returned to the food court for the pickup. When our observer called to ask where the bus was, it took 3 calls before he was told—rather rudely—that the bus had already been there to pick him up. Our observer politely responded that this was not true because he had been standing outside at the food court entrance since the beginning of the 15 minute window. The dispatcher insisted that our observer had missed his ride, even stating that an ABQ Ride supervisor had been with the driver, and assigned Delta’s tester a no-show for the trip.

It is not remarkable that this type of a dispute occurred. Missed rides like this are common in paratransit and happen every day in dozens of cities across the country. What was remarkable was the strident attitude of the dispatcher and her defiant tone, to a passenger who was being calm and polite. This should not occur and it would be good of ABQ Ride to work with staff to teach them how to be calm, reassuring and polite to passengers at all times, particularly at times such as this.

- **Long Trips:** During our test rides, we noted the time a bus left the pickup location and the time it arrived at the drop-off location to assess the average trip duration. Our results are as follows (we missed a time observation on 2 trips):

Trip Duration (minutes)	Number of trips
0-10 minutes	8
11-20 minutes	17
21-30 minutes	9
>30 minutes	4

We did not find these trip lengths to be at all excessive, as the longer rides were indeed for longer trips (i.e. Coors to Eubank). Out of the 38 trips we observed, 25 of them (66%) were accomplished in 20 minutes or less. Although we did not conduct a comparative analysis of these paratransit trips to fixed route trips, our experience riding the ABQ Ride bus system makes us comfortable asserting that the paratransit ride times were not excessive in comparison to equivalent bus trips. We do not believe that Sun Van is experiencing excessive trip lengths.

Overall, though Sun Van should work to improve their on-time performance, we saw little indication of any significant constraints on capacity.

Issues beyond the ADA Rules

In our assessment, we observed a number of items that were not ADA compliance matters but are general measures of the quality and effectiveness of a paratransit system's service. The results of these measures are presented below:

- Problems Finding Passengers: We evaluated if drivers had any difficulty locating passengers when they arrived for a pickup. In only 6 instances (12%) did drivers have a problem finding passengers and in no instances did a driver fail to find a passenger. This indicates that reservation information seems to be accurate and detailed.
- Delays in Boarding: We recorded the time between the arrival and the departure of the vehicle. In all but a few instances, the driver was able to board passengers and depart within 2-3 minutes.
- Boarding Assistance: In only 2 instances (3%) we observed passengers who would have benefited from driver assistance while boarding and the driver did not offer to help. While these instances are serious, they do not indicate a widespread problem.
- Lift Operation: We observed no instances of drivers being unable to operate the lift.
- Seatbelts: Sun Van policy states that ambulatory passengers are to wear seatbelts while aboard and drivers should enforce this rule. We observed 36 instances (out of 51 ambulatory passengers) or 70% of the time where drivers were not attentive to seatbelts. This should be addressed with additional driver training and management.
- Securements: In the cases of passengers using mobility devices, drivers always used securements for these devices. However, of the 13 cases where

securements were required and used, drivers improperly applied them 2 times (7% of the time). In these cases, straps were not properly applied or tightened, as in the photograph below.



Securement straps not tightened on wheeled mobility device

- Lap and Shoulder Belts: Although the lap and shoulder belt is an optional piece of equipment, it must be offered to passengers and properly applied if the passenger accepts its use. Although these belts were offered in every case, in one instance the driver used the shoulder belt without the lap belt and in 2 other instances, the driver appeared to not know how to use the belts (though they were eventually applied in both cases).
- Driver Attitude: We measured driver overall attitude based on how he/she interacted with each passenger. Using a three part scale, driver attitude was rated as follows:

Driver Attitude	Instances
Friendly	45
Neutral	19
Unfriendly	0

In several cases, we did not evaluate driver attitude because we did not see the driver interact with a passenger already aboard the bus. However, the overall attitude of drivers was very good.

- Clean Buses: We observed and evaluated the inside and outside of the ABQ Ride Sun Van fleet and found every bus we saw to be clean and in good operating condition.

Conclusion

Overall, we found the ABQ Ride Sun Van ADA paratransit service to be fully ADA compliant. The only area of concern we identified was somewhat disappointing on-time performance, which should be increased as much as possible to match that of the fixed route system (since fixed route comparability is the intent of ADA paratransit). Not only did we find that the Sun Van program was compliant, but we found that both the service area and the hours of service actually exceed the requirements of the ADA. The only major area of concern we found was in eligibility. We found the paper application to be overly general and the in-person interview process to be pro-forma and seriously lacking. ABQ Ride is missing a significant opportunity to properly assess the needs of applicants and is also missing an opportunity to educate passengers on the advantages of the significantly improved ABQ Ride fixed route network. If the current process can be enhanced and converted to a needs-assessment and education process, the system and passengers will benefit greatly.

Beyond strict ADA compliance, we found the Sun van program to be well run, with clean vans, professional and friendly drivers and overall safe operation.