

ADA PLAN UPDATE EXECUTIVE SUMMARY



**PREPARED BY
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APRIL 2003

**FINAL REPORT I
ADA PLAN UPDATE
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SECTION 1 INTRODUCTION

The Americans with Disabilities Act (ADA) provides civil rights to persons with disabilities with respect to public transportation, public accommodations and employment. Public transit agencies were required to become compliant with the ADA by January 26, 1996.

Laredo Transit Management, Inc. operates El Metro under contract with the City of Laredo. ADA Complementary Paratransit service is provided by a service, known as El Lift, in Laredo during all of the hours that El Metro operates. One hundred percent of trips are directly provided by El Metro staff. The initial ADA plan for El Metro was prepared in 1994 and the Laredo Metropolitan Planning Organization (MPO) and El Metro seek to update the current plan.

Providing quality cost effective ADA Complementary Paratransit is a difficult challenge for transit agencies across the United States. Three important goals of ADA Paratransit operations are often in conflict with each other. Transit agencies will seek to:

- Comply with the provisions of the ADA as it relates to Complementary Paratransit
- Provide a quality service that will meet the needs and expectations of the disability community
- Control ADA Complementary Paratransit operating cost so as to allow other transit priorities to be met

Technical Memorandum # 1 examined the El Lift paratransit operation, how it works, what it does and what are its policies. Compliance with the ADA, trend analysis of performance indicators and peer studies were also conducted. An overall perspective of El Metro emerged.

Technical Memorandum # 2 conducted a SWOT (Strengths, Weaknesses, Opportunities and Threats) Analysis of ADA Paratransit and related accessibility service. Findings and recommendations related to paratransit and accessibility were developed.

Technical Memorandum # 3 is the draft ADA Plan update. This memorandum constitutes the Draft Final Report – Part I. Part I is the ADA Plan Update. Part II covers the entire study and includes the Findings and Recommendations along with implementation strategies.

Section 2 in this report describes El Metro's fixed route service and its accessibility features. Section 3 reviews the ADA Complementary Paratransit Service; its current policies, procedures and operations. Section 4 includes ADA Plan revisions in all areas

except for eligibility and related issues. Section 5 includes revisions in the ADA Plan in eligibility and related issues. Appendix A summarizes the current and revised approach to ADA guidelines in the Plan Update. Appendix B includes the vehicles inventory for all revenue vehicles including fixed route and paratransit. Appendix C provides a summary of the findings and recommendations. Appendix D contains the resolutions needed for the ADA Plan Update from the City of Laredo and the Laredo Metropolitan Planning Organization (MPO).

SECTION 2 FIXED ROUTE OPERATIONS

El Metro is the fixed route operator for the City of Laredo. Fixed route service is provided through an extensive hub and radial system with eighteen local routes and one express route over a service area of 33 square miles within the corporate boundaries of the City of Laredo. Given that Laredo is an international border city, a substantial portion of fixed route ridership is comprised of residents of Nuevo Laredo who cross the US/Mexico border and access El Metro bus service. All routes begin or end at the downtown multimodal Laredo transit center. The nineteen fixed routes are as follows:

<u>Route Number</u>	<u>Name</u>	<u>Areas of Service</u>
1	Santa Maria	North
2	San Bernardo	North
3	Convent	Northeast
4	Retama	North
5	Marcella	Northeast
6	Cedar	Northeast
7A & 7B	San Eduardo	West
8A & 8B	Guadalupe	East
9	Market	Southeast
10	Corpus Christi	Southeast
12	<i>Del Mar Express*</i>	<i>Far North</i>
13	Heritage Park	Far East
14	Santa Rita	Southeast
15	Main/Riverside	Northwest
16	TAMIU	Far Northeast
17	Mines Road	Far Northwest
18	Palomino Express Shuttle	West
19	Santo Nino	Southeast
20	Los Angeles	Southeast

* *Express route with higher fare.*

Bus service operates seven days a week including holidays during the following hours:

El Metro Fixed Route Service	Fixed Route Service
Weekdays	6:00 AM – 10:00 PM
Saturdays	6:00 AM - 10:00 PM
Sundays and Holidays*	7:00 AM - 9:30 PM
Weekly Total	

* *Holidays include New Years Day, Independence Day, Thanksgiving, and Christmas Day*

Laredo Transit Management, Inc... operates with the following fare structure for fixed route service including the fare for the Express route – Del Mar Express as shown in Table 2-1.

**TABLE 2-1
 LAREDO FIXED ROUTE FARE STRUCTURE**

Adult Fare	\$ 0.75*	Senior Citizens Off-Peak (62 and over)	Free**
Student Fare	\$0.35	Persons with Disabilities Off-Peak	Free**
Children (5 to 11 years)	\$0.25	Medicare Card Holder Off-Peak	\$0.00
Children (under 5)	Free	Del Mar Express #12 – Peak Hours	\$1.00
Senior Citizens (62 and over)	\$.10**	Del Mar Express # 12 – Regular Off Peak	\$1.00
Persons with Disabilities	\$.10**	Seniors, Persons with Disabilities, Medicare	\$0.50

* Fare increase to \$1.00 pending City Council approval

** Metro ID card required for fare

Laredo urban population grew rapidly during the 1990's increasing by 42% from 123,651 in 1990 to 175,586 for the 2000 US Census. Given the high level of urban density, dedicated transit funding (0.25% sales tax) and public commitment to transit, Laredo has a high level of fixed route transit service especially when compared to cities of similar size in Texas and New Mexico as Table 2-2 shows

**TABLE 2-2
 POPULATION AND FIXED ROUTE RIDERSHIP**

	Laredo, TX	Brownsville, TX	Lubbock, TX	Amarillo, TX	Las Cruces, NM
Population	175,586	165,776	202,225	179,312	104,186
Fixed Route Ridership	4,897,407	1,562,922	3,732,784	314,813	647,408
Ridership Per Capita	27.89	9.43	18.46	1.75	6.21

Sources: Population is based upon the 2000 Census and Ridership in the 2001 National Transit Database

Fixed route ridership has increased steadily between 1998 and 2001 with an overall increase of 7.1% during the three year period. Total revenue hours (hours buses are providing transit service) have remained virtually flat between 1998 and 2001 with only a 0.9% increase. The result is that operating productivity (as measured in passengers per revenue hour) increased by nearly two passengers per hour to 33.09 in 2001 versus 31.17 passengers per revenue hour in 1998. Significantly more passengers were transported in 2001 with approximately the same level of transit service.

Revenue miles were also essentially flat with only less than a 0.01% increase in revenue passenger miles. Hence, productivity as measured by passenger per revenue mile also increased from 2.94 passengers per revenue miles in 1998 to 3.15 passengers per revenue mile in 2001. Total vehicle availability has remained unchanged during the four year period with peak fixed route revenue vehicles remaining at 33, with 46 total fixed route vehicles available. A listing of all fixed route buses is included in **Appendix B**. Since 1998, 100% of all fixed route vehicles have been accessible with side loading lifts on all buses. Operating costs have increased by 19.5% in the three year period from \$6,186,256 in 1998 to \$7,392,530 in 2001. **Table 2-3** summarizes El Metro’s fixed route operating data.

**TABLE 2-3
 FIXED ROUTE OPERATING DATA
 1998 - 2001**

	1998	1999	2000	2001
Fixed Route Ridership	4,572,500	4,295,064	4,777,891	4,897,407
Fixed Route Revenue Hours	146,680	120,815	142,438	147,999
Fixed Route Revenue Miles	1,553,686	1,395,832	1,558,468	1,553,813
Peak Revenue Vehicles	33	30	33	33
Total Fixed Route Vehicles	46	39	45	46
Percent of Accessible Vehicles	100%	100%	100%	100%
Operating Cost	\$ 6,186,256	\$ 5,643,412	\$ 7,066,155	\$ 7,392,530
Capital Funding	\$ 3,587,681	\$ 362,656	\$ 121,749	\$ 1,367,824
Total Costs	\$ 9,773,937	\$ 6,006,068	\$ 7,187,904	\$ 8,760,354

Source: 1998, 1999, 2000 and 2001 National Transit Database

Note: Fixed route operations as described in this section above illustrate the existing transit service and does not incorporate any changes proposed in the updated ADA Plan.

SECTION 3 EL METRO PARATRANSIT OPERATIONS

El Lift is the ADA Complementary Paratransit operation for El Metro. It provides curb to curb paratransit service for persons in Laredo who are unable to use the fixed route system as a result of a disability.

Up until 2000, El Lift was operated exclusively out of Operations on 411 Scott Street. However, in 2000 paratransit was reorganized with moving most of the El Lift support services (except safety, training and evening dispatch) transferred to the El Metro administrative office at 1301 Farragut.

PARATRANSIT OPERATIONS

Vehicle operations administer fixed route and paratransit as two transportation delivery systems working side by side, and not as separate and distinct operations. Seventeen van operators are assigned to paratransit routes, but may work in as fixed route operators. Fixed route operators will also work shifts as paratransit operators. Vehicle operations staffs who work in paratransit operations are:

- Assistant General Manager of Operations
- Superintendent of Maintenance
- Safety/Training/ADA Coordinator
- Road Supervisors
- Dispatch
- Maintenance Foreman
- Van Operators (fulltime)
- Other Operators (van part-time)
- Mechanics

Van operators and mechanics are represented by the United Transportation Union Local #1670. The most recent contract was ratified in March 2002 with the contract period starting on May 21, 2001 and ending on May 21, 2004.

Van Operators

Seventeen fulltime van operators operate the majority of service hours in ADA Paratransit. Operators are assigned scheduled runs that may include scheduled pickups and / or call back service.

El Lift has a high volume of call back (or will call) trips in which the passengers contact El Lift and indicate they are ready for their return trip. El Lift dispatches a vehicle and picks up the passenger within 60 minutes. Call back drivers are assigned and placed on standby. Call back drivers pick up passengers as requests come in to Dispatch.

Van operators' hourly wage scale is higher than fixed route operators. Virtually all public transit systems in the United States pay bus operators a higher hourly wage than van operators. However, at El Metro van operators are paid approximately 2% more per hour than drivers of fixed route buses. Staff indicates that paying van operators a higher salary was a means of retaining paratransit drivers and reducing turnover. As a result of El Metro's unique wage rate structure, van drivers also tend to be those drivers who have the highest seniority and experience.

Maintenance

Vehicle maintenance includes mechanics and cleaners working on both vans and buses. As a result, hours are allocated to paratransit or maintenance based upon preventative maintenance and unplanned service needs.

El Lift has eighteen (18) 2001 Aerolite cutaway vans. Vans were delivered in early 2002 and all have fewer than 60,000 miles on them. As a result, vehicles are experiencing relatively few maintenance problems at this time. The vehicles can accommodate up to seven ambulatory passengers, and up to three wheelchair passengers. Seven 1998 vans with higher mileage are also available as spares. El Lift's peak usage is 15 vans during weekdays. A listing of all ADA Paratransit vehicles is included in **Appendix B**.

Training

All operators receive joint bus and van operations training for five weeks. Four weeks are bus training. The one week of van training includes one and a half days of classroom training and three and a half days of road training with a driver.

Additional passenger sensitivity training and ADA compliance training is provided on an ongoing basis to bus operators and support staff. The most recent training was provided in December 2002 to all bus and paratransit operations.

Safety

Proper procedure for using lifts is demonstrated and practiced. Tie-down procedures for different devices are also shown. Defensive driving techniques are stressed.

Road Supervision

Road supervisors are responsible to monitor the movement and safety of both buses and vans on the street. Most of the road supervisor's duties with respect to paratransit are concerned with responses to passenger incidents and vehicle accidents.

Dispatch

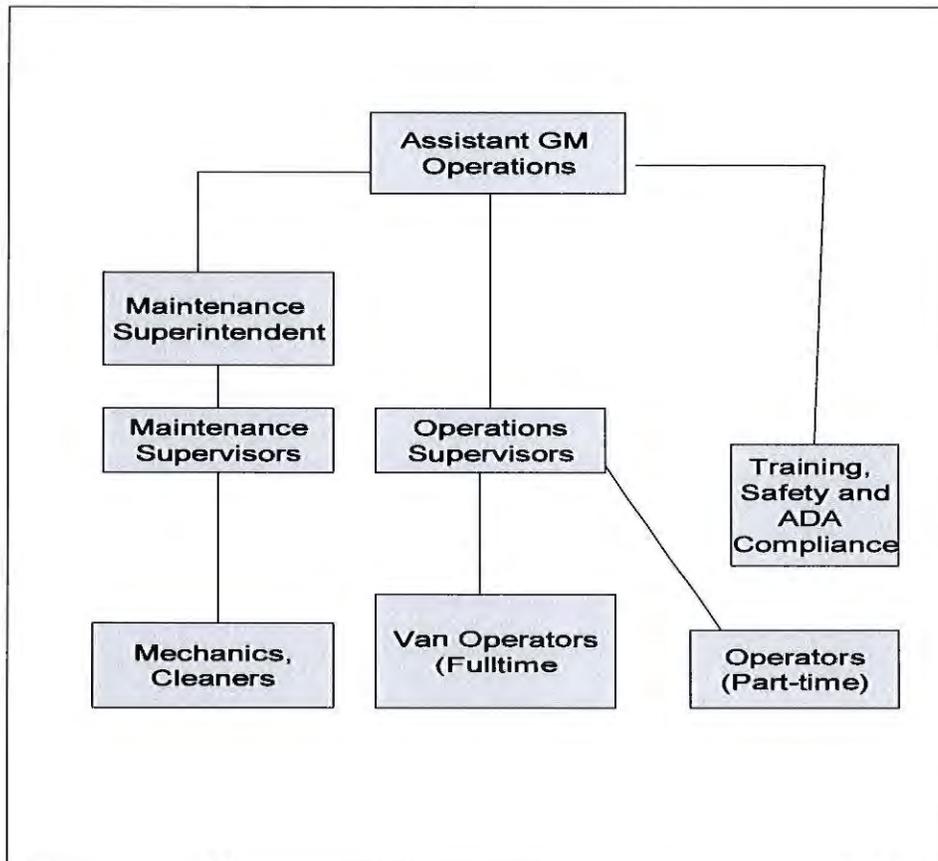
Paratransit Support in administration operates dispatch from 5AM to 7PM seven days a week. During early evenings, dispatch for paratransit drivers is operated from Paratransit Operations alongside Bus Operations.

Assistant General Manager Operations

All staff in bus and paratransit operations directly or indirectly report to the Assistant General Manager of Operations.

Chart 3-1 shows the organizational structure of Paratransit Operations.

**PARATRANSIT OPERATIONS
ORGANIZATIONAL CHART
CHART 3 - 1**



PARATRANSIT SUPPORT

Paratransit Support staff also provides assistance in the delivery of fixed route service. All El Metro staff performs other functions besides paratransit. Most support staff works both bus and paratransit customer service functions with duties including taking and scheduling reservations and conducting dispatch functions.

Eligibility

Customer service agents mail out ADA eligibility applications plus receive and conduct initial call screening. Applications are requested and mailed to prospective passengers.

El Metro eligibility process is a self-certification process with required verification of their ADA eligibility by a certified medical professional. Applications are completed by

the prospective passenger with decisions made on the basis of the information received. Completed applications are reviewed by the Customer Service Supervisor who makes an initial eligibility determination. Applications in which approval is uncertain or denied will be reviewed by the Planning and Marketing Manager subject to final determination.

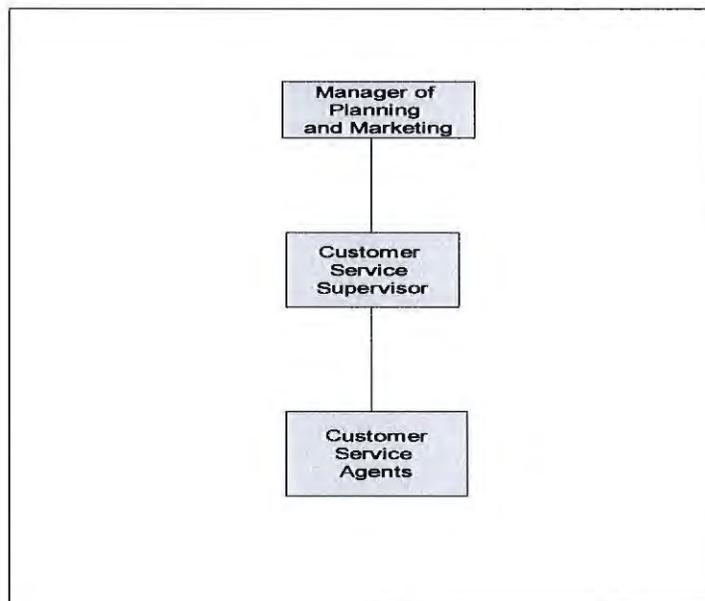
Reservations

Reservations is the call taking component of the ADA Paratransit operation where the customer service person receives a trip request from a El Metro passenger and negotiates a scheduled pickup for the requested trip. Passengers have the option of scheduling a fixed time for the return trip or requesting a call back. Should passengers request a fixed return time, the trip is scheduled as requested or based on availability. If the customer requests a call back, the return trip is not scheduled initially. Van operators are assigned to call back trips will be placed on standby until customer(s) requests their callback, i.e., return trip. Reservations can be scheduled between 1 days and 14 day in advance of the requested trip.

Scheduling

Scheduling involves managing planned trip itineraries in a manner that will improve productivity while maintaining a quality level of service

**CHART 3-2
PARATRANSIT SUPPORT
ORGANIZATIONAL CHART**



Dispatch

Reservations and scheduling deals with future paratransit service; dispatch focuses upon service the same day. Assuring Van Operators maintain communications during their run

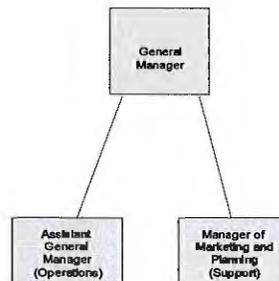
are primary components of the dispatcher's job and assuring callbacks are properly assigned. The Customer Service Supervisor and the Customer Service Agency monitor communications during working hours and Operation Dispatchers perform the function on evenings and weekends. **Chart 3-2** the organizational structure of paratransit support. The Assistant General Manager of Operations is in charge of all aspects of paratransit operations including Operations and Maintenance plus certain support functions such as Dispatch, Training and Safety.

Paratransit Management

The Manager of Planning and Marketing is in charge of eligibility, scheduling, reservations and most of dispatch. Additionally, the Manager of Planning and Marketing develops proposed changes to operational policy for El Lift.

Overall responsibility for all aspects of paratransit at El Lift resides with the General Manager. **Chart 3-3** outlines the Management structure.

**Chart 3-3
Paratransit Management
Organizational Chart**



The policies and procedures by which El Metro/Lift currently operates are contained within the current El Metro Customer Handbook. Policies and procedures can be divided into several areas:

- Service Availability
- Eligibility
- Scheduling Trips
- Using the Service
- No Show Policy

SERVICE AVAILABILITY

El Metro provides ADA Complementary Paratransit service throughout the City of Laredo during any hours that fixed route service is operating. Paratransit service is provided within the entire corporate boundaries of the City of Laredo, even if fixed route service is not available nearby. Additional service earlier than scheduled bus service is available, Monday through Saturday at 4:30AM. The purpose of the earlier service is primarily to address the needs of dialysis patients with early morning appointments. Service ends at 10:00 PM on weekdays and Saturdays. Sunday/Holiday service operates from 7:00 AM to 9:30 PM.

One way fares for El Metro/Lift service are \$.75. Passengers may pre-purchase their return trip and pay \$1.50. No monthly passes or multi-trip tickets are offered. Service is available to individuals who are certified as ADA eligible, and schedule a trip in advance. ADA Complementary Paratransit is designed as transit service and is not designed to be ambulance or for emergency medical transportation for persons with disabilities.

ELIGIBILITY

Individuals with disabilities who are residents of the City of Laredo must be certified as ADA eligible by El Metro. Persons are required to complete an eligibility application and have a certified medical professional complete a designated portion of the eligibility application. Initial determination of eligibility will be made by the Customer Service Supervisor and/or the Manager of Planning and Marketing. Additionally, final determination (based on an applicant appeal) will be made by the Paratransit Advisory Committee. Once an individual is approved for ADA Paratransit Service, they must obtain a numbered photo identification card for travel.

If an individual is approved for ADA Paratransit service, they are unconditionally eligible to use the service. Older applications are currently being reviewed by an outside agency to determine individuals who need to recertify their ADA eligibility.

SCHEDULING TRIPS

Individuals will call El Metro/Lift to schedule a trip providing:

- Their identification number
- The pick up location
- The drop off location,
- A requested pick up time
- Request return pick up time or call back (unless it is one way trip)

Reservations can be scheduled between 8:00 AM and 5:00 PM, seven days a week. El Metro/Lift trips can be scheduled two ways. First, if the trip is a reservation or casual

individual trip, it can be scheduled 1 day to 14 days in advance of the scheduled travel time. The passenger needs to advise if they will have a personal care attendant, companion or service animal accompanying them. Should travel be in a wheelchair or other mobility device, the passenger needs to inform the Customer Service Agents.

Second, trips in which the pick up and drop off time are routine and recurring; a subscription (permanent) trip can be scheduled. Once approved, the passenger need not contact El Metro unless there is a change in the location(s) or time of the travel.

Passengers will be notified whether or not their trip has been scheduled. If the trip is scheduled, passengers will receive a scheduled pick up time and drop off time in increments of fifteen minutes. Trips in which the passenger has scheduled a trip, but does not intend to travel should be cancelled as soon as possible.

USING THE SERVICE

Passengers are expected to be ready to travel 15 minutes before the scheduled pick up time. The driver will arrive and leave 5 minutes after vehicle has arrived (assuming it is within the time of the scheduled pick up) if the scheduled passenger has not appeared. Should the passenger fail to appear, after the designated five minute waiting period, the vehicle will depart and the passenger will be assessed a No Show.

El Metro service is a curb-to-curb service using lift-equipped vans. The operator assists the passenger in boarding and alighting the vehicle.

NO SHOW POLICY

El Metro/Lift has a No Show policy for repeated violations. If the rider does not appear for a scheduled trip or cancels a scheduled trip within three hours of their pick up, they are assigned a No Show. The written No Show policy is as follows:

- Three No Shows in a thirty day period – Letter of warning
- Four No Shows in a thirty day period - One week suspension from service
- Five No Shows in a 60 day period – 30 day suspension from service

PARATRANSIT OPERATING DATA

Ridership

Increases in demand for ADA for have been modest between 1996 and 2001, with two years (1999 and 2000), actually showing a decrease over the prior year. Overall ridership has been trending upwards. Total El Lift ridership was 8.37% higher in 2001 at 50,161 than in 1996 at 46,287. The average annual increase is 1.67% per year. **Table 3 - 1** shows the increase in ridership during the five year period.

Projected Demand

The demand projection is based upon the five year average increase in demand. A five year increase through 2007 will increase overall demand to 55,402 passengers. **Table 3 - 2** shows the five year projected increase in demand between 2002 and 2007.

TABLE 3 - 1
EL LIFT ANNUAL RIDERSHIP
1996 - 2001

	1996	1997	1998	1999	2000	2001	Five Year Increase	Average Annual Increase
EI Lift Ridership	46,287	49,686	50,161	48,471	48,077	50,161		
Percent Change		7.34%	0.96%	-3.37%	-0.81%	4.33%	8.37%	1.67%

Source: National Transit Database 1996 -2001

TABLE 3 - 2
EL LIFT PROJECTED RIDERSHIP
2002 - 2007

	2002	2003	2004	2005	2006	2007	Five Year Increase	Average Annual Increase
EI Lift Ridership	50,999	51,850	52,716	53,597	54,492	55,402		
Percent Change		1.67%	1.67%	1.67%	1.67%	1.67%	8.63%	1.73%

Other Demand for Accessible Transit

The large majority of transit trips for persons with disabilities are provided on fixed route service. During 2001, 764,341 elderly and handicapped trips were recorded on fixed route service. No data is available to distinguish which trips were made by older persons without disabilities and which trips were made by persons with disabilities. If 20% of those trips were made by persons with disabilities (a conservative estimate) 152,868 trips would have been made on fixed route service by persons with disabilities. Based on this conservative estimate, at least 75% of the demand for transit service for persons with disabilities is provided on fixed route service, not ADA paratransit.

Demand is rising modestly, but at a rate much slower than the national average levels of increase in ADA Complementary Paratransit of between 5 and 7 percent per year. Modest increases in demand should be expected to continue in coming years if operating policies and procedures are unchanged.

Operating Costs

Over the last five years, the average increase in operating cost has been 8.67% per year. Operating cost for ADA Paratransit increased from \$1,130,833 in 1996 to \$1,621,083 in 2001. Estimates of operating cost for 2002 are approximately \$2.14 million with a projected increase to \$2.25 million in 2003. **Table 3 - 3** shows the increase of operating costs between 1996 and 2001.

**EL LIFT OPERATING COST
 1996 - 2001
 TABLE 3 - 3**

	1996	1997	1998	1999	2000	2001
EI Lift Operating Cost	\$1,130,833	\$1,201,509	\$1,266,104	\$1,392,962	\$1,560,365	\$1,621,083
Percent Change		6.25%	5.38%	10.02%	12.02%	3.89%

Source: 1996 – 2001 National Transit Database

Note: ADA Paratransit operations and support as described in this section above illustrate the existing transit service and does not incorporate any changes proposed in the updated ADA Plan.

SECTION 4 REVISIONS IN PLAN TO PROVIDE COMPLEMENTARY ADA PARATRANSIT SERVICE

APPROACHING MOBILITY ISSUES

The goal of this ADA plan update is to provide changes that will substantially improve ADA Complementary Paratransit operations in terms of effectiveness in a cost-responsible manner over the previous ADA Plan. One key question to ask is what should the approach of Laredo and El Metro be with respect to the issue of mobility for persons with disabilities? ADA Complementary Paratransit is *one means* to provide persons with disabilities who cannot use public transit a level of mobility comparable to the level of mobility available on fixed route service. *ADA Paratransit is only a component of the mobility solution as it relates to transportation for persons with disabilities.* Fixed route travel in Laredo is the predominant means of providing public transportation for persons with disabilities.

A key strategy as it relates to the overall issue of effectively providing mobility for persons with disabilities is that **fixed route service must become physically and psychologically 100% accessible.** Making fixed route buses accessible with lifts is only one step along the path to true 100% public transit accessibility. The bus ride needs to become an experience that the person with disability is satisfied. What needs to occur is a concerted and ongoing effort to reach real 100% accessibility on fixed route service:

- Wheelchairs lifts need to be consistently functioning
- The operator must ensure that the person with a disability is welcome aboard the vehicle and not treated as “a burden”.
- Wheelchair and other mobility devices should be secured promptly and safely
- Stops should be called by bus operators at all major intersections and transfer points
- Training for all operators and supervisors in ADA issues needs to be ongoing
- Operators need to be held responsible when they provide poor service in any area related to failure to comply with ADA regulations
- Bus stops and paths to bus stops must be accessible or made accessible.
- Training on how to use fixed route service should be readily available to persons with disabilities
- Information on accessing fixed route should be available and accessible to persons with disabilities in multiple formats including large print and Braille.

El Metro and the City of Laredo are dedicated to providing in the updated ADA Plan a means to ensure that accessibility for fixed route service is easily to available to the widest range of potential persons with disabilities. The plan also seeks to comply with the

ADA as it relates to complementary paratransit with an approach that provides a satisfactory level of service quality in a fiscally constrained manner.

ADDRESSING PREMIUM SERVICE ISSUES

Premium services issues are challenging for paratransit systems. Premium service is defined herein as ADA Complementary Paratransit service provided above and beyond the minimum level required by the Americans with Disabilities. Providing premium service provides a transit agency with many advantages:

- Higher level of service for passengers using ADA Complementary Paratransit
- Greater flexibility in using service for passengers using ADA Complementary Paratransit
- More access to ADA Paratransit for passengers using complementary paratransit
- Less costly for passengers using complementary paratransit
- Greater areas and times of accessibility for passengers using complementary paratransit

Providing a minimum level of ADA Complementary Paratransit service is not an option for a transit agency, but a strict legal requirement. Therefore, an agency must dedicate a significant level of service and resources to meet the minimum requirements of the ADA - providing additional service is more costly. While several practical advantages exist for providing premium ADA Complementary Paratransit service, there are several disadvantages as well:

- Premium ADA Complementary Paratransit places greater financial strain on transit systems often resulting in reductions in accessible fixed route service. Providing premium ADA paratransit service does not necessarily benefit persons with disabilities as a whole. In Laredo, fixed route service provides at least three times as many trips to persons with disabilities ADA Paratransit service. Therefore, providing a high level of premium service for persons with disabilities riding ADA paratransit can result in reduced service for persons with disabilities using fixed route.
- Fiscal strain can result in the deterioration of paratransit service. As transit systems attempt to provide ADA service in an environment of financial and operational stress, service quality will often decline.
- Eliminating existing premium service is normally politically much harder than never providing such premium service in the first place. Riders and often other parties desire to maintain existing levels of service, and eliminating such service is often met with opposition.

Revisions in the Laredo ADA Plan, seek to reduce a substantial amount of the premium service provided by El Metro. The goal of the revisions will be to:

- Reformulate the ADA Paratransit service so that premium services offered will be in a more fiscally constrained manner

- Work to ensure short term and long term compliance with the ADA.
- Balance service and resources for all transportation services in a manner that will ensure the overall mobility of persons with disabilities.

The current ADA Plan Update seeks to phase out ADA paratransit service to areas of Laredo not served by fixed route service

Currently, persons who use El Lift can travel on public transit anywhere within the corporate boundaries of the City of Laredo; persons who use fixed route cannot travel to all areas especially in the far north and northeast parts of the City of Laredo.

The ADA requires the provision of ADA Complementary Paratransit service to trip origins and destinations within $\frac{3}{4}$ miles of where fixed route service. However, the rationale is the area within $\frac{3}{4}$ miles of a bus stop is the area where individuals would normally access fixed route bus service. Since ADA service is designed to be comparable to fixed route service only areas within $\frac{3}{4}$ mile are required to be served by paratransit.

Phase out of ADA Complementary Paratransit service beyond required areas is allowed under the ADA. Paratransit service is required *only in the same areas as bus service*. Other transit systems have acted in a similar manner.

- VIA Metropolitan Transit Board of Trustees voted in 2002 to phase out all service on VIAtrans (San Antonio's ADA paratransit service) outside of Interstate 410 that is not within $\frac{3}{4}$ miles of a fixed bus route
- Chicago RTA strictly limits ADA Paratransit to within $\frac{3}{4}$ miles of its fixed guideway and fixed route service
- HARTline in Tampa, Florida has strictly limited eligibility to within $\frac{3}{4}$ miles of a fixed bus route since it took ADA paratransit in house in late 1999.

The ADA Plan Update seeks to phase out ADA Complementary Paratransit service outside of the $\frac{3}{4}$ mile fixed route service area during the next 12 to 24 months. Determination of the boundaries of ADA Complementary Paratransit will be determined by the drawing of appropriate map polygons within the scheduling software system to be implemented in 2003.

The ADA Plan Update seeks for El Metro to reduce the period for advance reservations for El Lift from 14 days to 3 days

The original ADA regulations required reservations for paratransit trips to be scheduled up to 14 days in advance. Amendments to the regulations in May 1996 allowed transit agencies greater flexibility with respect to advanced reservations. Providing next day reservations (one day in advance) is required. Transit agencies *may allow* reservations to be accepted for ADA Complementary Paratransit from 1 day to 14 days in advance.

Transit agencies have decided to reduce the advance reservation period for ADA Complementary Paratransit, realizing several benefits:

- Reduced cancellations and No Shows will occur, since the passenger’s planning horizon with 14 day advance reservations often results in more trips scheduled than are actually made.
- Modest improvements in productivity resulting from reduced No Shows and cancellations.
- Reduced call volume for reservations. Trips in which passenger schedules a trip and subsequently cancels or No Shows creates additional work for call takers.
- Enhanced computer speed since fewer trips and days of service are required to be maintained in the active trip files (computer scheduling templates).

Five of six Metropolitan Transit Authorities in Texas have reduced the advance reservation period to less than 14 days since 1996. **Table 4-1** shows the approach of the five Texas transit agencies with respect to ADA Paratransit reservations.

**TABLE 4-1
 ADVANCE RESERVATIONS
 TEXAS METROPOLITAN TRANSIT AGENICES (MTA)**

TRANSIT AGENCY	ADVANCE RESERVATIONS
Houston Metro	1 day in advance
DART – Dallas	2-3 days in advance
VIA Metropolitan Transit – San Antonio	7 days in advance
Capital Metro – Austin	1 day in advance
The B - Corpus Christi	7 days in advance
Sun Metro – El Paso*	14 days in advance

** Note: Sun Metro is considering reducing its advance reservation period to 3 days*

Providing a three day advance reservation period will allow persons some flexibility in scheduling ADA Paratransit trips but by reducing the planning horizon for scheduling trips, the amount of cancelled trips and No Shows should be lower. Studies of the impact of reducing the advance reservation periods for ADA Complementary Paratransit have indicated that cancellation rates drop significantly only when the advanced reservation period is reduced below 5 days. The ADA Plan Update will seek to reduce the advance reservation period service during the next 6 to 12 months.

The ADA Plan Update seeks to phase out Call Backs for all ADA Paratransit trips

Providing call backs requires an inordinate amount of vehicles and operators to meet service. The trips provided by operators on standby only generate a productivity rate of about 0.50 to 1.00 passengers per hour. Hence, standby trips cost about two to three times as much to provide as pre-scheduled service. Given that approximately 20 - 25% of all

El Lift trips are standby, ADA Complementary Paratransit productivity is substantially lower and costs are drastically higher as a result of providing call backs.

Call backs are, in fact, same day trips – service not required by the ADA. Providing call back or same day service is premium service. The reason same day service is not required is that when the ADA regulations were written in 1990 and 1991, such an obligation was felt to be unduly onerous on transit agencies providing ADA Complementary Paratransit Service. *Agencies are required to provide next day service not same day service.* Of course, fixed route service is same day service but the route and trip time is known in advance. On ADA Paratransit, the route is unknown on the trip is scheduled. Creating an open-ended return trip through call backs is same day service.

Call backs are a primary reason why productivity in Laredo is much lower than its peers. **Table 4-2** shows that passenger per hour productivity in Laredo is lower than most of its peers even though the service area is smaller. Current productivity is approximately 1.78 passengers per vehicle hour. A productivity increase to 2.13 passengers per vehicle hour (20%) or more is entirely possible if call backs were eliminated. Individuals would need to ensure that sufficient time is scheduled for return trip for unexpected situations.

**TABLE 4-2
 PEER ANALYSIS**

	Laredo, TX	Brownsville, TX	Lubbock, TX	Amarillo, TX	Las Cruces, NM
Passengers Per Revenue Hour	1.78	2.65	2.32	1.65	3.27
Service Area (Square Miles)	33	38	109	88	57

The ADA Plan Update will seek to phase out call back trips during the next 12 to 24 months. All trips including return trips will need to be scheduled in advance. Eliminating call back would have the greatest impact of any change to El Lift service (especially in conjunction with effectively using scheduling software). An increase of El Lift productivity of 2.50 or 3.00 passengers per hour is possible.

The ADA Plan Update envision fares increasing to \$1.00 for ADA Paratransit

The current fixed route fare is \$.75; paratransit fare is \$.75. El Metro service costs more than \$45 per trip. The ADA cash fare covers less than 2 % of the operating cost of the service. ADA regulations recognized the financial challenges that ADA service is to transit agencies and considers a fare twice the level of fixed route fares to be reasonable.

Increasing the cash fare would ensure that paratransit passengers are contributing a more significant share of the cost of each trip. However, more than 98 % of the trip cost will still be paid by El Metro. With the envisioned increase of fixed route fares to \$ 1, the maximum allowable ADA Paratransit fare would be \$ 2. The Plan update recognized the practical challenges and hardship resulting from implementing a \$1.25 or 167% increase in ADA Paratransit fares.

Increasing the fare to \$ 1 is not an increase to the ADA maximum but a more modest increase that in conjunction with other changes will allow El Metro to provide a fuller range of accessible transportation services

ENHANCED PERFORMANCE REPORTING

The ADA Plan Update expects that the implementation of scheduling software by El Metro in 2003 will allow it to provide a higher level of quality and efficiency with respect to ADA Paratransit service

El Metro has made the decision to convert in 2003 from a manual scheduling system to an automated scheduling system. The scheduling system will transform the manner in which El Lift ADA Complementary Paratransit service is provided. The impact upon call taking, scheduling and dispatch will be drastic. The ability to use mapping technology, compile and report data to measure and adjust operation performance will be enhanced dramatically.

Scheduling software is capable of providing great improvements to the paratransit operation, but it is not a panacea. The implementation of scheduling software is an opportunity and a challenge that must be properly implemented.

The author of this memorandum wrote an article that was published in the Proceedings of the American Public Transportation Association 2001 Bus and Paratransit Conference. The article was titled, *Creating the Seamless Scheduling, Dispatch, Reporting Paratransit System*. Among the recommendations were eight suggestions for coping with significant technological change. The eight suggestions are included below to provide advice for the approach in implementing scheduling software at El Metro.

1. When using these technological tools, do not only consider how well they will work by themselves, but also consider how they will in tandem or in a group to enhance the quality and productivity of your paratransit service delivery. Each tool has advantages when used alone but the strengths can multiply when they effectively build upon each other.

2. Consider your paratransit systems needs now and for the next five or ten years. Technological tools will never be a panacea for the difficult logistical problems that face paratransit operations every day. Look at building the system that will do what you need. Consider what is achievable given the capabilities and resources of your organization.

3. *People will make the technological changes work or fail. If you do not have staff and drivers properly trained and do not clearly communicate and sell the changes being made you will have a very difficult time when you try to implement the system.*
4. *Operations, administration and MIS need to be certain that teamwork prevails in every sense over “territorialism”.*
5. *Getting the project right is more important than speed but vigorously prod the vendors to deliver and correct the unexpected problem quickly and thoroughly.*
6. *Be sure that the old habits die. Example: If you have an operational AVL system dispatchers should not be asking operators their “20” (location).*
7. *Encourage and reward new ideas as the new technology is installed. We can do it differently now, how can we do it better. People are changing how they do their job technically; this can be a good time to use the technology to help find other ways to do it better. Vendors will not necessarily know all the ways that their product can make your system better, front line people often can.*
8. *Use peer training to supplement vendor training. The comfort and skill level with the software will be much higher when it is time go live. Continue to emphasize the details while remaining focused upon the big picture of the operations. The system has to work well, but consider what is really doing to the operation. Do not be afraid to change or adjust directions if an anticipated outcome is no longer appropriate to the operation.*

Providing paratransit service has gotten too big and complex not to find a way to effectively use the technological tools that are offered. The key for the transit administrator is how to get the tools to work and work in unison, and through a dedicated staff and drivers, to work well.

The ADA Plan Update envisions the implementation of scheduling software during the next twelve months with the ability to more effectively to provide accurate and timely data in such areas as:

- On time performance
- Restrictions on trip requests
- Trips more than one hour late (missed trips)
- Vehicle on board time

Scheduling software when used with reporting tools will allow El Metro to fully assure compliance with all areas related to ADA Complementary Paratransit including the vital area of potential capacity constraints.

APPROACHING ENHANCED MOBILITY

The following changes in the ADA Plan Update are designed to enhance the level of mobility for persons with disabilities by providing a greater level of mobility by providing the informational and training tools of travel training and ensure that fixed route accessibility is enhanced to the greatest extent possible.

The ADA Plan Update envisions an increase in initiatives and partnerships with the community in the area of travel training services for persons with disabilities.

Travel training provides individuals with disabilities the opportunity to develop the needed skills and confidence to use fixed route service for some or all of their trips. The program can be beneficial in many respects as a valuable community service teaching individuals independent living skills which enhances their mobility and enhance available lifestyle choices.

Travel training efforts from the perspective of El Metro will focus upon providing opportunities frequent riders and newly eligible riders of ADA Paratransit service in order to assure access to a fuller range of mobility options. Training candidates who are more frequent riders will transition a larger number of trips to other modes, and new riders may be more receptive to the mobility opportunities of fixed route services.

Outreach and group training efforts will be initiated where possible to social and human service agencies in Laredo. To defray some of the costs of travel training activities, El Metro will identify and pursue potential sources of federal, state, and local funds for training efforts and consider innovative partnerships.

The ADA Plan Update seeks to ensure and maintain the progress that has been made on past problems with reliability of wheelchair lifts on accessible Fixed Route Buses

According to transit ride checks conducted in 2001 and 2002, significant problems remain with respect to the reliability of wheelchair lifts. In both surveys, more than one-third of the instances where a person in a wheelchair attempted to board, they were unable to do so. Maintaining reliable lifts is important with respect to ADA compliance. However, a second component of this problem is that unreliable encourages force individuals in wheelchairs and other mobility devices to use ADA Paratransit.

El Metro has made a vigorous commitment to fixing all of the lifts on fixed route vehicles and anticipates completion in the early part of 2003. El Metro is committed to maintaining all fixed route wheelchair lifts in good operations conditions. The City of Laredo recognizes that complying with the ADA and the existing Federal consent decree is a primary priority of El Metro.

The ADA Plan Update seeks to improve Vehicle Operator ADA Training

According to transit ride checks conducted in 2001 and 2002, significant problems exist with the securing of wheelchairs on fixed routes. Passengers were improperly secured or not secured at all into their wheelchairs. Securing passengers in wheelchairs is an important safety concern. The second problem cited in the ride checks is that unreliable lifts have forced individuals in wheelchairs and other mobility devices to use ADA Paratransit.

Both ride check surveys indicated that not one operator among the 74 ride check reports conducted in 2001 and 2002 called one single stop. The ADA explicitly requires bus operators on fixed route to call stops for “all major intersections and transfer points.” Calling stops is important with respect to ADA compliance. However, a second component of failing to call stops is makes it difficult for many persons with disabilities to navigate the fixed route service.

In response to these serious concerns, El Metro required every Vehicle Operator to attend and participate in an extensive two hour refresher training course covering a wide range of ADA Paratransit and Fixed Route Accessibility issues in November and December 2002. Additional training with respect to ADA issues including sensitivity training will be added to the training for new operators. Periodic refresher training for current operators will continue

The ADA Plan Update seeks to amend the operator Code of Conduct

No issue with respect to ADA accessibility issues is addressed in the Management - Union Code of Conduct. Through discussions with United Transportation Union Local # 1670, the plan seeks to incorporate the following changes in the next 12 to 18 months.

The following three items should be added as Class B Violations:

- Failure to call stops at major intersections or transfer points (El Metro should list those for every route).
- Failure to notify dispatch or maintenance of an inoperable lift
- Failure to stop for a person in a wheelchair or other mobility device
- Failure to properly secure a wheelchair or other mobility device

Providing the training and changing the code of conduct requires management and supervisors to ensure that operators are providing accessible service. Should operators not provide the appropriate level of service, it is necessary to consistently discipline operators who do not adhere to the Code of Conduct.

ADDITIONAL ISSUES

Alternate Formats

Updated ADA Plan provides persons with disabilities to receive the consumer handbook or other materials in alternate formats including Braille, large print and computer disk are available upon request.

Companions and Personal Care Attendants

El Lift charges no fare for Personal Care Attendants (PCA) as long as the passenger specified on their application that they need a PCA some or all of the time. El Lift cannot unilaterally require a passenger to have a Personal Care Attendant. The fact that a PCA is traveling must be specified at the time of the reservation. The PCA must travel from the same origin and to the same destination as the passenger.

When scheduling a trip, a passenger may have one companion accompany them. The companion will be charged the same fare as the passenger. Additional companions may travel on the same trip at the discretion of El Metro. The companion(s) must travel from the same origin and to the same destination as the passenger.

Agency Trips

El Metro reserves the right to schedule agency trips to designated agencies for ADA eligible passengers. El Metro reserves the right to charge a fare as consistent with existing federal, state and local guidelines.

Trip Purpose

All ADA Paratransit trips will be scheduled without regard to trip purpose. No trip requested by an ADA eligible shall receive priority over another.

Summary of Changes

A summary of the changes incorporated in the ADA Plan Update is included in the ADA Matrix in **Appendix A**. The specific ADA guideline and the current and updated practice are noted.

SECTION 5 SERVICE ELIGIBILITY

REVISED ELIGIBILITY PROGRAM

The revised ADA Plan seeks to implement in person and functional assessments during the next 12 to 24 months in order to accurately determine an individual's eligibility for ADA Complementary Paratransit Service.

Currently, individuals with disabilities who are residents of the City of Laredo must be certified as ADA eligible by El Metro. Persons are required to complete an eligibility application and are subject to professional verification of their application. Additionally, final determination can be made by the Paratransit Advisory Committee when significant eligibility questions arise.

El Metro allows most passengers to certify their eligibility status without directly evaluating their eligibility through an in-person interviews or eligibility assessments. As a result, approximately 99% of applicants for ADA Complementary Paratransit are approved. In reality, many persons who are approved do not meet strict ADA eligibility criteria. Approving individuals who are not ADA eligible means that transit resources are stretched to provide service to individuals who could use fixed route service.

One of the enduring myths of ADA regulations as they relate to public transportation is that ADA Complementary Paratransit is a civil right of persons with disabilities. The ADA provides individuals with disabilities a right to public transit not a right to ADA Complementary Paratransit. ADA eligibility process for ADA Complementary Paratransit "...shall strictly limit ADA Eligibility to individuals specified in 37.125 of this Part." ADA regulations address individuals who are unable to access fixed route services in a community as a result of a disability. As the discussion of the ADA regulations state:

An impairment-related condition does not confer eligibility if it simply makes the use of fixed route transit less comfortable, or more difficult, than use of fixed route transit for persons who do not have the condition. ... The rule provides that unless the condition prevents the travel, the individual is not ADA paratransit eligible.

Self-certification with only medical verification (especially when such verification is provided by the applicant's physician or certified medical professional) does not necessarily lead to a fully accurate determination of ADA eligibility. Individuals who apply for ADA Paratransit cannot be expected to be objective and impartial in determining their eligibility. Persons who apply for service have a vested interest in ensuring approval of their application.

The second stage of the eligibility process at El Metro also entails significant problems in accurately determining eligibility. A certified professional (physician or other certified medical professional) provides information designed to document an individual's

eligibility. Two problems arise with this method. The professional has often has a financial relationship with the applicant as a client or a patient. As such, there is a vested interest in ensuring that their wishes are met and transportation is available so that the client / patient will continue to see them. Many professionals are often not expert on ADA regulations and may not be qualified to determine ADA eligibility. Approval rates for ADA paratransit are normally around 99 % of all applicants when such a medical certification is included and no additional verifications are provided or conducted.

Improving the eligibility program is the most important and productive action that El Metro can undertake to effectively address the appropriate level of demand for ADA paratransit service in Laredo in both the short and long term.

Ridership has not increased significantly since 1997 on El Metro. However, it is likely that future growth will occur. An aging population, the increase in persons using dialysis, etc., will result in long term increases in demand for El Metro services. Continuing to certify eligibility the same way, will increase the pool of eligible riders resulting in increases in demand for service and greater increases in operating costs than currently projected.

El Metro should develop a program of impartial functional and cognitive assessments for applicants who upon initial review, the status of eligibility is not certain.

Transit systems throughout the United States have been faced with rapidly rising growth in ADA Paratransit ridership. During the initial years of ADA implementation, in the early 1990's, transit managers noted the large influx of applications and noted that with self and professional certification, virtually all applications for ADA approval were accepted. An accurate perception existed among paratransit managers that many individuals who applied for ADA Paratransit service really did not meet the strict standard, but simply wanted a van that would come to their door.

Transit systems began developing a more rigorous approach to ADA eligibility during the middle of the 1990's. Among the methods used in recent years:

- Citizen's Area Transit (CAT) in Las Vegas has developed a three hour personal interview, orientation and assessment that prospective ADA applicants are required to complete.
- DART in Dallas requires all applicants to undergo a functional assessment conducted by medical professionals with expertise in mobility issues. A simulated bus is used to determine an individual's ability to use fixed route service. If a person can to and use fixed route service, they do not need paratransit even if they have a verifiable disability.
- The Central Ohio Transit Authority (COTA) in Columbus, Ohio contracts to a private independent medical provider with a broad level of expertise in disability issues to conduct functional and cognitive assessments. Applicants whose eligibility is deemed uncertain are required to go through an evaluation by the

independent medical provider. Approximately 30 – 40 percent of all applicants undergo an evaluation.

- VIA Metropolitan Transit in San Antonio also conducts functional and cognitive assessments for all applicants. Every applicant is required to undergo assessments and interviews by trained staff with certified assessment tests to assure eligibility.

A completed application for ADA service can require a functional assessment, a cognitive assessment and/or an in-person interview prior to the application being deemed complete. As long as the process is not considered unduly onerous, the transit agency has wide latitude in developing an eligibility program. If an individual schedules and fails to attend the required assessment, their application is deemed incomplete and service is not approved for them. All of the above-mentioned transit systems who have used an enhanced assessment process have noted several advantages:

- A substantial higher number of individuals (8 – 25%) are deemed ineligible for ADA Paratransit.
- A significant number of individuals who apply for service chose (for various reasons) not to undergo the assessments. As a result, their application is never completed.
- Instead of unconditional eligibility (unlimited use of ADA Paratransit for any and all trips), it is easier to transit agencies approve individuals for specific conditions as the assessments will allow a better understanding of the individuals abilities and needs.
- Instead of indefinite eligibility, it is easier to transit agencies approve individuals for temporary time periods as the assessments will allow a better understanding of situations where there is a reasonable expectation that an applicant's impairment may improve over time.

Table 5 - 1 illustrates some of the different approaches used by other large transit systems with respect to eligibility. All systems use professional eligibility assessments, and some use in-person interviews as well. The ratio of eligible passengers to population is interesting to examine. VIA, DART and Houston Metro all have eligibility ratios of over 100 to 1, meaning that less than 1% of the service area eligible population is certified for ADA Complementary Paratransit. Eligible passengers for El Paso comprise more than 1.77% of the City of El Paso total population meaning that 1 of every 56 residents of the City of El Paso is eligible for paratransit. El Paso is the one of the transit systems that uses an eligibility process similar to Laredo. With 3,500 eligible applicants nearly 2% of the total population of Laredo is eligible for El Lift. Less strict eligibility programs appear to result in an increased number of persons eligible for ADA Complementary Paratransit in a community.

**TABLE 5 - 1
 COMPARATIVE TRANSIT AGENCY APPROACH
 TO ADA ELIGIBILITY ISSUES**

Eligibility Approach	DART	Houston METRO	King County Metro	VIA	Sun Metro – El Paso
Service Area Population	1,904,330	2,632,241	1,744,086	1,358,087	563,622
Eligible Passengers	7,000	21,000	26,000	11,000	10,000
Population per Eligible Passenger	272	125	67	123	56
In Person Interviews	Yes	Yes	No	Yes	No
Eligibility Assessments	Yes	Yes	Yes	Yes	No
Travel Training	Yes	Yes	Yes	Yes	No
Re-certifications	Yes	Yes	Ongoing in 2002	Yes	No

Source: "Best Practices in ADA Paratransit", prepared by Miami-Dade County

Providing a more comprehensive assessment process does involve a substantial investment of resources either in staff, facilities or hiring of outside professionals. However, the investment should be seen as a net cost saver since the impact on reduced demand for paratransit service significantly outweighs the cost of administering or contracting for the enhanced eligibility process. CAT in Las Vegas conducted a cost-benefit study and determined that \$2.50 in reduced demand were saved for every \$1.00 spent on eligibility assessment

All individuals who apply for ADA Paratransit will be required to have an in person interview with El Metro staff (or contract staff) in which the individual's ability to use ADA Paratransit will be reviewed. Should after review of the application and the interview, the individual's eligibility status is uncertain, they shall be required to attend a functional eligibility assessment to further clarify their ability to access fixed route service.

The ADA Plan Update anticipates that El Metro will develop a Request for Proposal (RFP) in order to contract with a professional provider to conduct eligibility assessments including re-certifications. Preparation, evaluation, and implementation of the RFP are envisioned within the next 12 months.

All applications will be reviewed within 21 days upon full completion. The in-person interview and the functional assessment (when required) are essential for an application to be completed. Receipt of completed a signed eligibility application does not constitute a complete application for ADA Paratransit Once the interview and assessment are complete the 21 day period commences.

Passengers are required to complete all steps (in person interview and eligibility assessment) within 45 days of submittal of a signed application for ADA Paratransit. Should they fail to complete the application process, within 45 days, the entire process will begin anew.

The applicant for ADA Paratransit who does not complete the ADA eligibility process is not eligible for ADA service but until the application process is completed, they cannot appeal for eligibility. Should a passenger not receive a determination of eligibility after 21 days of completing the eligibility process, they will be granted presumptive eligibility until such time as a determination of eligibility is made. All applicants for ADA Eligibility will be notified of the decision in writing. Should eligibility be denied, steps to appeal the denial will be specified in writing as well.

RECERTIFICATION

The ADA Plan Update seeks to incorporate a process where all passengers are re-certified for ADA Paratransit on an ongoing basis. Recertification will occur every three years for all passengers on a staggered basis.

Recertification will not begin until the new eligibility process is operational. One third of existing applicants who have not been certified since 1999 will be re-certified in year one, the second third in year two and the remaining in year three. The re-certification cycle will continue indefinitely.

Recertification of existing passenger is allowed under the ADA, and while a time consuming process, it serves several important purposes:

- Individuals who are deceased or have moved are removed from eligibility rolls as a result of their non-response to recertification. Currently, El Metro/Lift has more than 3,500 ADA eligible passengers. DART in Dallas with a service area population more than ten times larger than Laredo has fewer than 7,000 eligible passengers.
- Persons whose ability to use fixed route service has improved may now be able to use fixed route service and are no longer eligible for ADA Paratransit service.
- If the prior recommendation for an enhanced eligibility process is implemented, the recertification process will identify individuals who while previously

approved, no longer meet ADA paratransit eligibility requirements and can use El Metro fixed route services.

Combined with an enhanced eligibility process, recertification can effectively determine an individual's ability to use fixed route service.

BEHAVIORAL SUSPENSIONS FROM SERVICE

Missed Trips

The ADA Plan Update seeks to revise the No Show Policy and increase enforcement of No Shows

El Metro has a No Show Policy. However, due to the lack of statistical reporting, the policy is rarely enforced. The current No Show policy is designed to work as follows:

- **Three no shows or cancellations in a thirty day period** – A letter of warning
- **Four no shows or cancellations in a thirty day period** – A 7 day suspension with a 14 day period to appeal
- **Five no shows or cancellations in a sixty day period** – A 30 day suspension with a 14 day period to appeal

El Metro defines a No Show as a trip where the passenger cancels within four hours of the scheduled trip or does not appear at the time of service.

Certain individuals will only adjust their behavior when suspensions are enforced. El Metro should suspend individuals with verifiable No Shows. Passengers now have a good reason to ignore the No Show policy, since it is currently not enforced. Each No Show disrupts and slows paratransit service resulting in reduced productivity and increased service cost. Some No Shows are unavoidable. Passengers will get sick and occasionally other unexpected contingencies will arise. Individuals should not be sanctioned for the occasional and unavoidable No Show.

Other individuals' No Shows demonstrate a pattern or practice of No Shows on scheduled trips frequently. A small number of individuals generate a disproportionate number of No Shows. Such individuals are the focus of the No Show policy. The No Show policy should address the "Chronic No Shows" by:

- Warnings and strong sanctions designed to modify their behavior to reduce or eliminate occurrences of No Shows
- Should the behavior of continuing high level of No Shows continue, increasingly severe suspensions from service are used as sanctions since the abuse to the ADA Paratransit service continues despite warnings and sanctions,

Most passengers respond to warnings or the first occurrence of suspension and modify their behavior to assure that they can continue to use the service. However, the stronger sanctions often prove necessary for a very small group of individuals.

Table 5-3 indicates that other transit agency's No Show policies are highly progressive with penalties increasing after repeated occurrences and range as long as a one year suspension from service.

Proposed Revised No Show Policy

A No Show is defined as:

- A trip in which the passenger does not appear for their scheduled pickup and the driver has waited 5 minutes at the pick up location
- A passenger cancels the scheduled trip when the vehicle arrives
- A passenger cancels the trip less than 4 hours prior to the scheduled pickup.

A No Show occurrence is defined as 3 No Shows within one calendar month. Such an occurrence remains on a passenger's record for 12 months. Sanctions will increase if individuals repeatedly violate the policy. Records of occurrences for passengers can be easily and accurately maintained on an Access or similar database.

The following sanctions are proposed for violators of the El Metro No Show policy are shown in **Table 5-2**:

**TABLE 5-2
PROPOSED SANCTIONS FOR
VIOLATION OF NO SHOW POLICY**

First occurrence in a 12-month period	7-day suspension from service
Second occurrence in a 12-month period	30-day suspension from service
Third occurrence in a 12-month period	90-day suspension from service
Fourth occurrence in a 12-month period	9-month suspension from service

**TABLE 5-3
 ADDITIONAL TRANSIT SYSTEMS
 NO SHOW POLICIES**

No Shows Definitions/ Sanctions	DART Dallas	Houston METRO	King County Metro, Seattle	VIA, San Antonio	COTA, Columbus, Ohio	Lynx, Orlando
What is a no show?	Trip cancelled less than two hour to pickup or trip where passenger does not show up	Trip cancelled less than thirty minutes prior to pickup or trip where passenger does not show up	Trip cancelled after 5 PM on the prior day or a trip where passenger does not show up	Trip cancelled less than two hours to pickup or trip where passenger does not show up	Trip cancelled less than two hours to pickup or trip where passenger does not show up	Trip cancelled less than four hours to pickup or trip where passenger does not show up
Is there a warning?	No	Yes and placed on Confirmation Program	No	No	Yes	Yes, there are two verbal warnings and one written warning.
How many no shows are excessive in one month?	3	2	6	3	3	4
First violation (or after warning)	30 day suspension	7 day suspension	7 day suspension	7 day suspension	7 day suspension	14 day suspension
Second violation	30 day suspension	Increasing	increasing	14 day suspension	30 day suspension	30 day suspension
Third violation	30 day suspension	Increasing	increasing	30 day suspension	6 month suspension	1 year suspension
Fourth violation	30 day suspension	Increasing	Increasing	30 day suspension	6 month suspension	1 year suspension

Sources: Transit agency websites, rider manuals and telephone interviews

As is mentioned earlier, the goal of the program is to focus upon the individual who is chronically violating the No Show policy. Unless the threat of sanctions results in a change of behavior, the passenger will face increasingly longer suspensions from service. The result should be a significant reduction in the number of No Shows and an increase in productivity.

The ADA Plan Update envisions the implementation of the No Show Policy in the next 12 to 18 months following successful implementation of the scheduling software program.

All warnings and suspensions shall be in writing. Should a notice of suspension be sent, dates of the suspension and steps to appeal the suspension will be specified in writing.

VIOLENT, DISRUPTIVE OR ILLEGAL BEHAVIOR

The Updated ADA Plan clarifies El Metro's approach to certain behavior which may occur on ADA Paratransit vehicles. The ADA allows suspensions from service if passengers on ADA Paratransit or in fixed route service engage in violent, disruptive and illegal behavior. While ADA eligibility is a civil right, certain actions or behaviors can constitute a threat or danger to the passenger engaging in the behavior, other passengers on the vehicle, the driver and other persons and properties on the road.

Under the Updated ADA Plan, the General Manager, Assistant General Manager of Operations or the Manager of Planning and Marketing can immediately suspend an individual from service for 7 days up to an indefinite time period based on the circumstances and severity of the individual's behavior.

APPEALS

The denial or temporary suspension of the right to use ADA Paratransit can occur for one of three primary reasons:

- Eligibility to use the service is denied
- Passenger is suspended for violation of the No Show Policy
- The passenger engages in violent, disruptive or illegal behavior

In all cases, the passenger will have the right to appeal the administrative actions. The Paratransit Advisory Committee will act as the appeal panel for appeals. Passengers must appeal the action in writing in accordance with the guidelines of the suspension or denial action. Once such an appeal is made, a hearing will be set. El Metro staff will present the reasons for the actions, offering relevant evidence, documents, affidavits and other relevant information. Of course, passengers or their designated representative may present reasons, relevant evidence, documents, affidavits and other information as to why the action of El Metro should be overturned.

The Paratransit Advisory Committee will hear the appeal and render a decision. The decision of the Paratransit Advisory Committee is final, and not subject to appeal.

SECTION 6 PUBLIC PARTICIPATION

Public participation is an essential element of any ADA Plan Update. Public meetings of the Paratransit Advisory Committee (PAC), the Technical Advisory Committee (TAC) of the Laredo Metropolitan Planning Organization and an all day open public workshop to discuss the findings and recommendations related to ADA Paratransit and accessibility in El Metro and the updated ADA Plan.

- Public Meetings of the PAC were held in August 2002, September 2002, October 2002, November 2002, December 2002, January 2003 and April 2003.
- Meetings of the MPO TAC were held in September 2002, January 2003 and April 2003.
- An all day workshop presenting and inviting comment on the Updated ADA Plan was held on February 7, 2003.
- An open public forum presenting and inviting comment on the Updated ADA Plan was held on February 27, 2003.
- The ADA Plan was presented for approval and was approved by the Laredo City Council on April 21, 2003
- The ADA Plan was presented for approval and was approved by the Laredo MPO on May 1, 2003.

APPENDIX A
ADA COMPLEMENTARY PARATRANSIT GUIDELINES
EL METRO CURRENT AND REVISED

REGULATION	ADA GUIDELINE	CURRENT POLICY	REVISED POLICY
Violent/Disruptive Behavior <i>Subpart A 37.5h</i>	Allows suspension from service for violent, disruptive and illegal behavior.	No written policy	Written policy in Section 6
General Provision <i>Subpart F 37.121</i>	Provide ADA Complementary Paratransit service if providing fixed route service	Provides EI Lift service	Provides EI Lift service
Trip by Trip Eligibility <i>Subpart F 37.123</i>	Persons can be eligible for some trips but not unconditionally eligible for ADA Paratransit Service	Trip by trip eligibility is not used by EI Lift	Trip by trip eligibility is not used by EI Lift
Additional Individuals	A Personal Care Attendant (PCA) or companion can ride on a scheduled ADA trip	ADA Paratransit Consumer Handbook states rider can bring along someone to help them.	ADA Paratransit Consumer Handbook states rider can bring along someone to help them.
Eligibility Process <i>Subpart F 37.125a</i>	Process shall strictly limit eligibility to individuals cited in Subpart F 37.123	Self certification with a required professional assessment by a certified medical professional	Eligibility process to include in-person interviews and professional functional assessments where needed,
Alternative Formats <i>Subpart F 37.125b</i>	The agency shall provide application materials in alternate forms upon request.	Consumer Handbook does not indicate alternate formats are available. Handbook is prepared in English and Spanish.	Updated ADA Plan indicates alternate formats including Braille, large print and computer disk are available upon request
21 Day Rule <i>Subpart F 37.125c</i>	When an application is completed, an applicant is informed on the decision within 21 days.	Consumer Handbook states a prompt review will be conducted by EI Metro.	Completed applications (with all assessment done) will be reviewed within 21 days or presumptive eligibility will be granted.

REGULATION	ADA GUIDELINE	CURRENT POLICY	REVISED POLICY
Notification of Decision <i>Subpart F 37.125d</i>	Applicants will be notified of eligibility decisions in writing.	Consumer Handbook does not specify.	Updated plan specifies written notification.
Eligibility Documentation <i>Subpart F 37.125e</i>	The applicant who is approved shall be provided documentation that they are ADA eligible.	Receives an identification number.	Receives an identification number.
Recertification <i>Subpart F 37.125f</i>	Individuals may be recertified at reasonable intervals.	Recertification is not mentioned in the Consumer Handbook.	Recertification will occur at three year staggered intervals.
Eligibility Appeal Process <i>Subpart F 37.125g</i>	Establish an administrative appeals process to hear denials of eligibility.	Appeals process stated with Paratransit Advisory Committee.	Passengers will be notified in writing with appeal remedy specified
No shows/Missed Trips <i>Subpart F 37.125h</i>	May suspend for a reasonable period of time.	No show policy outlined.	Revised No Show policy outlined
Missed Trips Appeals <i>Subpart F 37.125h</i>	Passenger must be provided specific reason for suspension and right to appeal.	Appeals processes specified.	Appeals processes specified
Need for PCA <i>Subpart F 37.125i</i>	The transit agency may require the individual to indicate if they need a PCA.	Requires passenger to have PCA if needs assistance.	Passenger cannot be required to have a personal care attendant
Trip for Visitors <i>Subpart F 37.125i</i>	Person with disability who resides outside of area but is ADA eligible.	Provides policy for visitors.	Complies with ADA
Service Options	a) Can provide origin to destination service	Provides origin to destination service.	Complies with ADA
	b) Can provide feeder service to fixed routes	Does not provide feeder service	Possible service option
	c) Can provide bus on call (route deviation) service	Does not provide on call service	Possible service option
<i>Subpart F 37.129</i>			

REGULATION	ADA GUIDELINE	CURRENT POLICY	REVISED POLICY
Service Area	Paratransit service 3/4 mile on each side of within jurisdictional boundary of fixed route service - commuter service is exempt.	Provides service citywide.	Service to be provided within 3/4 mile of bus route in 12 to 24 months
<i>Subpart F 37.131a</i>			
Next Day Reservations	Service shall be scheduled and provided to all requests for next day service.	Provides service request within one hour of request and normally within fifteen minutes of request.	Service will be provided within one hour of request with assistance of scheduling software parameters
<i>Subpart F 37.131b</i>			
Reservation Service Hours	Reservation service shall be available during normal business hours.	Reservations available 8 AM to 5 PM, seven days a week.	Reservations available 8 AM to 5 PM, seven days a week.
<i>Subpart F 37.131b</i>			
Pickup Time Negotiation	Trips cannot be required to be scheduled more one hour before of after the requested departure time.	Provides trips at requested time, if not available within one hour.	Provides trips at requested time, if not available within one hour
<i>Subpart F 37.131b</i>			
Real Time Scheduling	Agency can use real time scheduling to provide paratransit service.	Uses real time scheduling	Uses real time scheduling
<i>Subpart F 37.131b</i>			
Advanced Reservation	Agency may permit reservations up to 14 days in advance of desired trips.	Trips may be reserved from 14 days until 5:00 PM the day prior to scheduled travel.	Reservation period to be reduced to 3 days within 6 – 12 months
<i>Subpart F 37.131b</i>			
ADA Fare	Agency may charge twice the full fixed route fares.	El Metro charges the same fare for bus and ADA Paratransit.	El Metro charges the same fare for bus and ADA Paratransit.
<i>Subpart F 37.131c</i>			
Companion Fare	An individual accompanying passenger pays the regular ADA Paratransit fare.	The companion fare is not explicitly stated.	Companion fare specified in updated plan.
<i>Subpart F 37.131c</i>			

REGULATION	ADA GUIDELINE	CURRENT POLICY	REVISED POLICY
PCA Fare <i>Subpart F 37.131c</i>	A rider's Personal Care Attendant (PCA) shall ride free.	The PCA fare is not stated	The PCA fare is stated.
Agency Fares <i>Subpart F 37.131c</i>	Agencies may charge higher fares to organizations for agency trips for ADA eligible persons.	No agency fares charged.	El Metro reserves the right to negotiate and charge a higher fare
Trip Purpose <i>Subpart F 37.131d</i>	The agency cannot impose any restrictions or priorities on trip purpose.	No practice trip of trips prioritization.	Lack of prioritization specified in ADA Plan Update
Hours and Days of Service <i>Subpart F 37.131e</i>	The hours and days of ADA Paratransit service must be the same as fixed route service.	Hours meet fixed route and all times and exceed fixed route in early morning for dialysis trips.	Hours will become the same as fixed route in the next 12 to 24 months
Trip Denials <i>Subpart F 37.131f</i>	Current FTA and court interpretation is that any substantive amount of trip denials is a capacity constraint.	Indicates does not deny trips. Trips not accommodated at requested time are scheduled within allowable window of sixty minutes from requested pick up time.	Indicates does not deny trips. Trips not accommodated at requested time are scheduled within allowable window of sixty minutes from requested pick up time.
Waiting Lists <i>Subpart F 37.131f</i>	Waiting lists for service access are not allowed.	No waiting lists for regular service.	No waiting lists for regular service.
Excessive Late Trips <i>Subpart F 37.131f</i>	The agency shall not have a significant amount of untimely pickups.	Not available for review, El Metro does not track on time performance.	On Time data not available – will be available with scheduling software.
Missed Trips <i>Subpart F 37.131f</i>	Trips that arrive for the pickup more than one hour late.	Not available for review, El Metro does not track missed trips.	Missed trip data not available – will be available with scheduling software.
Excessive Trip Lengths <i>Subpart F 37.131f</i>	The agency cannot provide substantial trips with excessive length.	Not available for review, El Metro does not track excessive trip lengths.	Excessive trip length data not available – will be available with scheduling software.

APPENDIX B EL METRO VEHICLE INVENTORY

**TABLE B-1
 FIXED ROUTE REVENUE VEHICLES**

Number	Make/Model	Vehicle Type	Year	Mileage
9133	Gillig Phantom	35/96TB/6V92T	1991	369,060
9134	Gillig Phantom	35/96TB/6V92T	1991	555,786
9135	Gillig Phantom	35/96TB/6V92T	1991	523,360
9136	Gillig Phantom	35/96TB/6V92T	1991	484,322
9137	Gillig Phantom	35/96TB/6V92T	1991	565,165
9138	Gillig Phantom	35/96TB/6V92T	1991	427,641
9139	Gillig Phantom	35/96TB/6V92T	1991	484,781
9140	Gillig Phantom	35/96TB/6V92T	1991	528,771
9141	Gillig Phantom	35/96TB/6V92T	1991	455,716
9142	Gillig Phantom	35/96TB/6V92T	1991	442,441
9143	Gillig Phantom	35/96TB/6V92T	1991	477,849
9144	Gillig Phantom	35/96TB/6V92T	1991	493,609
9145	Gillig Phantom	35/96TB/6V92T	1991	490,501
9146	Gillig Phantom	35/96TB/6V92T	1991	567,529
9147	Gillig Phantom	35/96TB/6V92T	1991	525,574
9148	Gillig Phantom	35/96TB/6V92T	1991	301,825
9249	Gillig Phantom	35/96TB/6V92T	1992	513,644
9250	Gillig Phantom	35/96TB/6V92T	1992	390,920
9411	Ford	E350 Super Club Wagon	1994	98,940
9412	Ford	E350 Super Club Wagon	1994	119,050
9452	Blue Bird		1994	197,598
9515	Champion	3500 HD Vandura	1995	151,004
9516	Champion	3500 HD Vandura	1995	140,986
9520	Champion	30 HD Chevy Van	1995	134,430
9621	Champion	30 HD Chevy Van	1996	112,194
9622	Champion	30 HD Chevy Van	1996	135,648
9623	Champion	30 HD Chevy Van	1996	140,214
9624	Champion	30 HD Chevy Van	1996	120,743
9625	Champion	30 HD Chevy Van	1996	116,990
9701	RTS Nova	T70606	1997	174,288
9702	RTS Nova	T70606	1997	211,129
9703	RTS Nova	T70606	1997	180,796
9704	RTS Nova	T70606	1997	167,155
9706	RTS Nova	T70606	1997	177,420
9707	RTS Nova	T70606	1997	184,830
9708	RTS Nova	T70606	1997	200,744
9709	RTS Nova	T70606	1997	205,097
9710	RTS Nova	T70606	1997	219,601

Number	Make/Model	Vehicle Type	Year	Mileage
9711	RTS Nova	T70606	1997	190,455
9712	RTS Nova	T70606	1997	203,983
9713	RTS Nova	T70606	1997	237,826
9714	RTS Nova	T70606	1997	189,574
9715	RTS Nova	T70606	1997	195,040
9801	RTS Nova	T70606	1998	140,718
9802	RTS Nova	T70606	1998	129,996
9803	RTS Nova	T70606	1998	141,205
9804	RTS Nova	T70606	1998	122,707
9805	RTS Nova	T70606	1998	142,418
9806	RTS Nova	T70606	1998	139,472
9807	RTS Nova	T70606	1998	125,028
9808	RTS Nova	T70606	1998	140,623
01	Chance Coach	Trolley	1996	73,964
02	Chance Coach	Trolley	1999	47,267
0024	RTS Nova	T8020VN	1998	56,214
0025	RTS Nova	T8020VN	1998	63,627
0026	RTS Nova	T8020VN	1998	63,002

**TABLE B -2
 ADA PARATRANSIT
 REVENUE VEHICLES**

Number	Make/Model	Vehicle Type	Year	Mileage
9851	Chevrolet	Terra Transit	1998	111,616
9852	Chevrolet	Terra Transit	1998	100,637
9853	Chevrolet	Terra Transit	1998	98,461
9854	Chevrolet	Terra Transit	1998	104,101
9855	Chevrolet	Terra Transit	1998	120,664
9856	Chevrolet	Terra Transit	1998	107,900
9857	Chevrolet	Terra Transit	1998	86,208
0258	Chevrolet	21 Aerolite	2002	11,429
0259	Chevrolet	21 Aerolite	2002	10,795
0260	Chevrolet	21 Aerolite	2002	7,086
0261	Chevrolet	21 Aerolite	2002	9,989
0262	Chevrolet	21 Aerolite	2002	7,569
0263	Chevrolet	21 Aerolite	2002	6,294
0264	Chevrolet	21 Aerolite	2002	10,345
0265	Chevrolet	21 Aerolite	2002	9,579
0266	Chevrolet	21 Aerolite	2002	3,550
0267	Chevrolet	21 Aerolite	2002	10,507
0268	Chevrolet	21 Aerolite	2002	10,528
0269	Chevrolet	21 Aerolite	2002	8,878
0270	Chevrolet	21 Aerolite	2002	7,138
0271	Chevrolet	21 Aerolite	2002	5,827
0272	Chevrolet	21 Aerolite	2002	8,578
0273	Chevrolet	21 Aerolite	2002	6,719
0274	Chevrolet	21 Aerolite	2002	7,768
0275	Chevrolet	21 Aerolite	2002	10,113

APPENDIX C

SUMMARY OF FINDINGS AND RECOMMENDATIONS

Appendix C is a summary of the findings and recommendations of the ADA Plan Update as they relate to changes to the El Lift ADA Complementary Paratransit program. Not all recommendations are incorporated into the plan update. **Appendix C-1** will indicate the approval process needed for each individual recommendation.

Each recommendation has an impact upon at least one of four key elements of ADA Complementary Paratransit: addressing the cost per trip, productivity, demand or increasing mobility. The basic impacts are outlined in the spread sheet below.

ATTACHMENT C

SUMMARY OF ADA PARATRANSIT FINDINGS AND RECOMMENDATIONS FOR EL LIFT

Number	Finding	Recommendation	Addresses Cost Per Trip	Addresses Productivity	Addresses ADA Demand	Enhances Mobility
# 1	Operating cost at El Metro has increased by 11.5% per year between 1997 and 2002	Addressing operating costs requires alternatives for service provision	X			X
# 2	Indirect cost for ADA Paratransit is not accurately allocated	Develop a more objective way to allocate indirect cost and continue to use it	X			
# 3	Large amount of key operating information is not available	Use scheduling software for better reporting	X		X	X
# 4	The current ADA Paratransit eligibility program is inadequate to assure that individuals who are not qualified for ADA Paratransit are allowed to ride	Develop an enhanced and stricter eligibility program through the use of in- person interviews and functional assessments.			X	
# 5	El Lift paratransit covers all areas of Laredo including portions that bus service does not run	Phase out service to periphery of Laredo or charge a premium fare for service to non bus areas of Laredo	X	X	X	X
# 6	Reservations for ADA trips are scheduled up to 14 days in advance	Reduce Advance Reservation Period to 14 days		X	X	
# 7	Call back service is provided on a large amount of return trips	Reduce callbacks to 30 trips per day	X	X	X	
# 8	El Metro base fare is same as cash fare	Increase Cash Fare to \$ 1; \$ 2 increase is possible			X	

Number	Finding	Recommendation	Addresses Cost Per Trip	Addresses Productivity	Addresses ADA Demand	Enhances Mobility
# 9	The No show policy is not enforced	Revised No Show Policy		X		
# 10	El Metro will be implementing scheduling software	Effective implementation of scheduling software will improve productivity and increase the quality of reporting at El Metro		X		X
#11	El Metro has not developed initiatives in the areas of travel training	Strengthen Travel Training Support with incentives to individuals who frequently use paratransit service		X		X
# 12	Lifts on ADA Fixed route buses are unreliable	Fix Lifts on Buses without delay			X	X
#13	Operator ADA training on fixed route service is inadequate	Conduct Driver ADA Training			X	X
#14	ADA accessibility issues are not addressed in the Operator Code of Conduct	Make Changes to the Employee Code of Conduct to address operator issues			X	X

**APPENDIX C -1
 APPROVAL NEEDED FOR
 FINDINGS AND RECOMMENDATIONS FOR EL LIFT**

Number	Finding	Recommendation	El Metro Management	Union – Management Discussion	City Council Approval
# 1	Operating cost at El Metro has increased by 11.5% per year between 1997 and 2002	Addressing operating costs requires alternatives for service provision	X	X	X
# 2	Indirect cost for ADA Paratransit is not accurately allocated	Develop a more objective way to allocate indirect cost and continue to use it	X		
# 3	Large amount of key operating information is not available	Use scheduling software for better reporting	X		
# 4	The current ADA Paratransit eligibility program is inadequate to assure that individuals who are not qualified for ADA Paratransit are allowed to ride	Develop an enhanced and stricter eligibility program through the use of in- person interviews and functional assessments.	X		X
# 5	El Lift paratransit covers all areas of Laredo including portions that bus service does not run	Phase out service to periphery of Laredo or charge a premium fare for service to non bus areas of Laredo	X		X
# 6	Reservations for ADA trips are scheduled up to 14 days in advance	Reduce Advance Reservation Period to 14 days	X		X
# 7	Call back service is provided on a large amount of return trips	Eliminate Callbacks	X		X
# 8	El Metro base fare is same as cash fare	Increase Cash Fare to \$ 1	X		X
# 9	The No show policy is not enforced	Revised No Show Policy	X		
# 10	El Metro will be implementing scheduling software	Effective implementation of scheduling software will improve productivity and increase the quality of reporting at El Metro	X		
# 11	El Metro has not developed initiatives in the areas of travel training	Strengthen Travel Training Support with incentives to individuals who frequently use paratransit service	X		
# 12	Lifts on ADA Fixed route buses are unreliable	Fix Lifts on Buses without delay	X		X
# 13	Operator ADA training on fixed route service is inadequate	Conduct Driver ADA Training	X		X
# 14	ADA accessibility issues are not addressed in the Operator Code of Conduct	Make Changes to the Employee Code of Conduct to address operator issues	X	X	X

**APPENDIX D
CITY COUNCIL AND MPO RESOLUTIONS**

Resolutions of approval for the ADA Plan Update by the Laredo City Council and the Laredo MPO are included.

RESOLUTION NO. 2003-RT-002

ORIGINAL

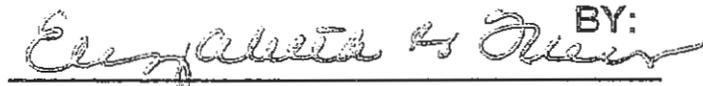
ENDORISING THE UPDATED LAREDO ADA PARATRANSIT
PLAN AND RECOMMENDING THAT THE LAREDO
METROPOLITAN PLANNING ORGANIZATION APPROVE
THE PROPOSED DOCUMENT.

WHEREAS, the committee known as the Laredo Urban Transportation Study (LUTS), the designated Metropolitan Planning Organization (MPO) for the Laredo urbanized area, is required to review and certify compliance by the Laredo Transit Management, Inc. (El Metro) with the Americans with Disabilities Act (ADA) as it relates to the provision of public transportation services;

NOW THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF LAREDO THAT:

It endorses the updated Laredo ADA Paratransit Plan and recommends that the Laredo Metropolitan Planning Organization approve the proposed document.

PASSED BY THE CITY COUNCIL AND APPROVED BY THE MAYOR
ON THE 21st DAY April 2003.

 BY:

ELIZABETH G. FLORES, MAYOR

RESOLUTION NO. MPO 2003-3

BY THE LAREDO URBAN TRANSPORTATION STUDY
METROPOLITAN PLANNING ORGANIZATION POLICY COMMITTEE

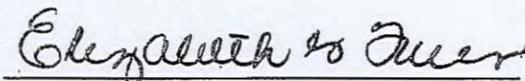
**ADOPTING THE 2003 AMERICANS WITH DISABILITIES
ACT (ADA) PARATRANSIT PLAN**

WHEREAS, the Laredo Urban Transportation Study (LUTS), the designated Metropolitan Planning Organization (MPO) for the Laredo Urban Area, is required to review and certify compliance by the Laredo Transit Management, Inc. (El Metro) with the Americans with Disabilities Act (ADA) as it relates to the provision of public transportation services; and,

WHEREAS, the Laredo Urban Transportation Study, through the City of Laredo, contracted the services of A&R Consulting to update the ADA Paratransit Plan for Laredo and provide findings and recommendations to improve the services and operations of the system; and,

WHEREAS, the Laredo Urban Transportation Study (LUTS) has reviewed the proposed 2003 ADA Paratransit Plan and finds that the proposed plan addresses the elements necessary for the LUTS area;

NOW THEREFORE BE IT RESOLVED, that the Laredo Urban Transportation Study, as the designated Metropolitan Planning Organization for the Laredo urban area, adopted the 2003 Americans with Disabilities Act (ADA) Paratransit Plan, which is attached hereto and made a part hereof for all purpose on this the 1st day of May, 2003:



Honorable Elizabeth G. Flores
Mayor of Laredo and Chairperson of the
MPO Policy Committee

A&R Consulting
April 2003