



Kansas RTAP Fact Sheet

A Service of The University of Kansas Transportation Center for Rural Transit Providers

Serving ADA and Non-ADA Riders Together

By Erik Berg

Paransit service has long been a staple of urban and rural transit systems. Disabled individuals often depend on this service to meet many of their most important transportation needs, including access to jobs and medical care. The Americans with Disabilities Act dramatically expanded the requirements for paransit operations, and increased demand for paransit from newly-ADA-eligible riders. Not all paransit riders are ADA-eligible, but non-ADA riders often obtain funding from other sources and may require the same services as ADA riders.

The Transit Cooperative Research Board's Report 143 is a resource guide for transit operators who want to offer paransit services for ADA eligible and non-ADA eligible riders together. Combining riderships is an important consideration for fixed-route and rural transit organizations that often must find ways to share resources and improve efficiency. The TCRP's Report 143 provides information on how non-ADA paransit riders may be served with ADA riders, and outlines the four most common types of this blended paransit service. The report also provides lessons learned from transit systems that already serve ADA and non-ADA riders together.

Understanding combined ADA and non-ADA paransit services

While the practice of serving paransit riders whose rides are supported by different funding sources has been in practice long before the ADA, the introduction of ADA produced new definitions and models of service.



Tips for planning and operating a comingled paransit service

To assist rural transit agencies, Report 143 includes decision flow charts for both planning and operating paransit systems that can serve both ADA-eligible riders and non-ADA funded riders. According to the report, the major steps for planning a system are:

- Define the purpose and objectives for comingling riders.
- Identify available capacity and funding.
- Evaluate service compatibility. A rural transit agency must consider the types of ADA and non-ADA riders it would serve on a comingled service. Not all passenger types may ride well together, and their needs may be very different.
- Consider primary service parameters: service area, service span (days and hours of service), reservation time period, and fare structure.

www.shutterstock.com / Ragne Kobanova

A relatively new term used to describe combined ADA and non-ADA eligible paransit services is "comingling." This is defined as "routinely transporting ADA eligible paransit riders with 'other'

non-ADA paransit riders on the same vehicles at the same time." Use of this term is growing in transit, and is the preferred term used by the authors of this study.

A variety of non-ADA funding-eligible paratransit riders may be served alongside ADA riders. Some examples mentioned in the report are Medicaid beneficiaries, elderly riders with transportation funding from Title III of the Older Americans Act, New Freedom program beneficiaries, and members of the Job Access and Reverse Commute (JARC) program. Individuals in support-services programs also may be served with ADA riders, for example, developmentally disabled individuals, persons discharged from hospitals, dialysis patients, rehabilitation services patients, adult day-care clients, and children (including those in the Head Start program).

Factors to consider when deciding to operate a combined service

A transit agency's decision to serve ADA and non-ADA riders with the same service depends on three key factors:

1) The cost-sharing structure. Transit systems and human service agencies can realize cost savings by combining service, but this only works when there is a clear and equitable cost-sharing structure between the ADA and non-ADA programs that fund riders. If the cost-sharing structure is not clear, coordination becomes more difficult because the transit agency won't always know which programs to bill for each individual rider's trips. Confusion over cost allocation, service quality and operational control issues may make combined service among transit providers and human service agencies unworkable. Transit agencies and human service providers should consider whether they can reach a clear and equitable cost-sharing agreement before deciding to operate a combined service.

2) The level of state commitment for coordinating these types of ridership. Some states have coordination requirements and provide incentives for it. According to the report, a 2005 study found that as many as 21 states had specific legislation mandating the coordination of ADA and human service transportation. The decision to offer combined service may not always

The most important elements for successfully operating comingled service are sustained education campaigns, effective record-keeping and proper funding mechanisms.

depend on state requirements and incentives, but when present, these factors are very persuasive in the decision to offer such service. Transit services should learn about state regulations regarding combined paratransit services, as well as financial incentives available for operating such a service.

3) How paratransit services have evolved within the transit agency to date. Many transit agencies offered paratransit service long before the advent of the Americans with Disabilities Act. For these agencies, the decision to add ADA services to their existing non-ADA paratransit service proved fairly simple, and has been largely successful. Transit operators new to offering paratransit service can also be successful, but the learning curve is steeper, as these operations must understand the regulations and funding mechanisms for the ADA and non-ADA services they plan to offer. A transit operator must consider the agency's past experience with paratransit and whether or not to tackle this learning curve when deciding to operate a combined service.

Models of ADA/non-ADA combined paratransit service

The authors identified four models that combine ADA and non-ADA paratransit service:

In the first model, a Human Service Transportation Provider previously operated paratransit services prior to passage of the ADA, and then added ADA service. An example of the first model may be a nonprofit agency that has become the ADA paratransit service provider for the local transit agency, or a transit agency that has incorporated a

former nonprofit transportation program into their paratransit service structure.

The second (and most prevalent) model includes ADA paratransit service providers that added human service transportation for non-ADA riders.

In the third model, a Public Dial-A-Ride service operates in coordination with ADA paratransit service. This system may be the result of consolidation of rural transit services to save on costs and eliminate duplication.

The fourth model is a two-tiered paratransit service where an ADA paratransit service offers enhanced demand-response services beyond the minimum service distance from ADA-serving fixed-route corridors. Because of the fixed-route element of this model, it is more typically seen in larger city transit systems. The system may simply be serving ADA riders at a greater distance from fixed routes than the ADA requires.

Report 143 was written with a focus on paratransit agencies that most closely identify with the second model, because these are the most common type of paratransit service providers. Paratransit systems that predate ADA legislation were found to be more likely to offer ADA/non-ADA service together, as were services operating in areas where sharing resources was more critical to service.

Lessons learned about serving ADA and non-ADA riders together

The researchers learned that the most important elements for operating comingled systems successfully were sustained education campaigns, effective record-keeping, and proper funding mechanisms.

State and local conditions matter, especially in terms of funding and the need for service. The decision whether to offer ADA/non-ADA paratransit or to keep them separate will depend on these conditions.

Planning, flexibility, and determining eligibility is critical for running an effective ADA/non-ADA comingled service. The planning process must identify key aspects of the combined service, develop contingency plans, assure adequate sources of funding will

be available, and work through potential obstacles before the service starts operating. Flexibility with the service is key, as transit agencies must fine-tune the service to suit the needs of their specific area. No planning process can predict all possibilities and outcomes, so a transit system that allows for flexibility will be more successful with their comingled service.

Successful ADA/non-ADA systems also recognize the importance of continuing education efforts aimed at specific target audiences. Educated policy makers can provide effective supportive when issues arise about funding and continuing service. A transit system staff that is well-educated about the ADA/non-ADA service can help ensure smooth operation with the right service for the right rider, and effective and well-maintained billing for services. Paratransit riders must be continuously educated, too, about the type of service they receive and any changes to the service, as well as any changes to the funding they receive.

Determining the eligibility of participants for either ADA funding or funding from other sources is paramount to running the combined service. If funding sources for non-ADA riders are not clearly identified, cut back, or if they are ended, operating the service becomes very difficult. Systems that offer ADA/non-ADA paratransit service must be meticulous about maintaining their record-keeping so that the right human service programs are billed for transportation services.

ADA regulations for paratransit may be different than those for non-ADA. For example, ADA paratransit does not require documentation for trip type or individual service use by riders, but other funding programs may require such information. Transit systems must

The TCRP Report 143 recommends that paratransit operators follow the decision steps listed in the report's flow chart for planning first, and then turn to operational decisions. The following are major steps for operating a comingled paratransit system:

- Establish passenger eligibility requirements. The U.S. DOT ADA regulations are described in 49 CFR §37.123, and ADA determination process requirements are described in 49 CFR §37.125. Consult with your KDOT program consultant with any questions you have on ADA and Non-ADA eligibility.
- Develop operating and cost allocation policies and procedures.
- Identify reporting requirements and assess technology needs. Operators of ADA/ Non-ADA service must fulfill reporting requirements for both ADA and Non-ADA paratransit funding.
- Develop marketing, education, and monitoring programs.

Contact KDOT for Assistance

These individuals can help answer questions you may have about establishing comingled ADA/non-ADA service at your transit agency in Kansas.

- For CTD #s 1, 2, 12: Scott Lein, 785-368-7091, slein@ksdot.org
- For CTD #s 3, 4, 5, 9, 13, 15: Stacey Cowan, 785-296-5284, staceyc@ksdot.org
- For CTD #s 6, 7, 8, 10, 11, 14: Connie Spencer, 785-296-5194, connies@ksdot.org.
- KDOT Public Transportation Manager: Josh Powers, 785-296-4907, joshuap@ksdot.org

consider the varying requirements for ADA paratransit and other funding sources when deciding whether to offer comingled service.

Finally, managing system performance and demand is very important to an effective comingled service; a job made easier with new technologies for reservations, scheduling, and dispatching.

To learn more about offering ADA/non-ADA paratransit service, and determine whether such service is right for your agency, read the full TCRP Report 143. A link to the report is listed below. Also,

contact your KDOT Program Consultant at the Kansas Department of Transportation. See list of contacts on this page. ●

Reprinted from the October 2012 issue of the *Kansas TransReporter*, a publication of the Kansas Rural Transit Assistance Program (RTAP) at the Kansas University Transportation Center.

Source

- Gerty, Procopio, Ferris, Ellis and Knapp. 2011. TCRP Report 143: Resource Guide for Comingling ADA and Non-ADA Paratransit Riders. http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_143.pdf.