RTS Access Paratransit Plan

Summer 2019 to Summer 2020

PROPOSED BOARD POLICY

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Table of Contents

[Description of Submitting Entity 1](#_Toc3800858)

[Introduction 2](#_Toc3800859)

[Purpose of a Paratransit Plan 2](#_Toc3800860)

[Section 1: Description of R G R T A’s Fixed Route System and Paratransit Services 3](#_Toc3800861)

[Exhibits for Section 1 10](#_Toc3800862)

[Section 2: Plan to Provide Comparable Paratransit 34](#_Toc3800863)

[Exhibits for Section 2 49](#_Toc3800864)

[Section 3: Process for Determining A D A Paratransit Eligibility 70](#_Toc3800865)

[Exhibit for Section 3 71](#_Toc3800866)

[Section 4: Public Participation Process to Develop the Plan 93](#_Toc3800867)

[Exhibits for Section 4 94](#_Toc3800868)

[Section 5: Efforts to Coordinate with Other Entities 135](#_Toc3800869)

[Section 6: Endorsements or Certifications 135](#_Toc3800870)

[Exhibits for Section 6 136](#_Toc3800871)

[Section 7: Plan Updates 140](#_Toc3800872)

# Description of Submitting Entity

This section provides identifying information for Rochester Genesee Regional Transportation Authority ("R G R T A" or "the Authority"), as required in Subpart F, §37.139 (a)

R G R T A provides public bus transportation in Genesee, Livingston, Monroe, Ontario, Orleans, Seneca, Wayne, and Wyoming Counties. In Monroe County, R G R T A provides fixed route service and complementary paratransit service.

R G R T A Mission Statement: We are our community’s provider and partner for safe, reliable, and convenient public transportation that people can build their lives around.

R G R T A Vision: The preferred Transportation choice.

# Introduction

The Americans with Disabilities Act of 1990 (A D A) prohibits discrimination against individuals with disabilities with regard to their access to public transportation.

R G R T A provides fixed route bus service through Regional Transit Service ("RTS"). For people whose disabilities prevent them from using RTS all or some of the time, R G R T A provides complementary paratransit service through RTS Access. Federal regulations require that 1) RTS service is accessible to people with disabilities, and 2) the RTS Access service is comparable to RTS. R G R T A must ensure that the level of service for paratransit-eligible people who ride RTS Access is comparable to the level of service for people without disabilities who ride RTS.

# Purpose of a Paratransit Plan

In 1991, the Code of Federal Regulations (CFR) issued criteria for paratransit service in “Title 49 – Transportation, Subtitle A – Office of the Secretary of Transportation, Part 37 – Transportation Services for Individuals with Disabilities, Subpart F – Paratransit as a Complement to Fixed Route Service” (“Subpart F”). Subpart F sets forth the general requirement for R G R T A to develop a Paratransit Plan, to submit the Plan to the Federal Transportation Administration (FTA), and to perform updates annually. R G R T A uses the A D A Paratransit Plan (“Plan”) as a tool to compare the service components of RTS and RTS Access and ensure compliance with Subpart F. This Plan will use the term “customer” to refer to any individual certified as A D A-paratransit eligible through the RTS Access eligibility certification process. In 1996, the Department of Transportation (DOT) amended the regulations to eliminate the requirement to update a paratransit plan annually. As a recipient of federal funding, R G R T A is still required to certify to the FTA annually that it has met and continues to meet the requirements under Subpart F. R G R T A performs this certification in the annual FTA Fiscal Year Certifications and Assurances. Exhibit 14 Certifications and Assurances provides an example of this certification.

# Section 1: Description of R G R T A’s Fixed Route System and Paratransit Services

This section is an overview of the R G R T A business structure. It describes the types of service, the fare structure, and the days/hours of service for RTS and RTS Access as it is expected to be implemented in the Summer of 2020.

## 1.1. Business **Structure** Overview

The Rochester Genesee Regional Transportation Authority (“R G R T A” or “the Authority”) is a public authority created under New York State Law. Created in 1969 by an act of the State Legislature, the Authority has responsibility for the continuance, development, and improvement of public transportation and related services within the Genesee/Finger Lakes region. R G R T A has eleven separately incorporated business units. R G R T A oversees daily operation of the subsidiaries.

In the Summer of 2020, Regional Transit Service, Inc. (RTS) will provide a redesigned fixed route service and a new demand response service in Monroe County. RTS Access (Lift Line, Inc.) will provide complementary paratransit service in the redesigned RTS service area in Monroe County.

The following subsidiaries provide demand responsive and countywide route deviation service in their respective counties:

RTS Genesee (Batavia Bus Service, Inc.)

RTS Livingston (Livingston Area Transportation Service, Inc.)

RTS Ontario (County Area Transit Service, Inc.)

RTS Orleans (Orleans Transit Service, Inc.)

RTS Seneca (Seneca Transit Service, Inc.)

RTS Wayne (Wayne Area Transportation Service, Inc.)

RTS Wyoming (Wyoming Transit Service, Inc.)

Genesee Transportation Council Staff, Inc. (G T C S)

The City of Rochester is the region’s economic and cultural center. Most of the current and potential bus riders live and work in Monroe County and the City of Rochester. The fixed route system in Monroe County was designed decades ago when downtown Rochester was the center of the community from every perspective – economically, residentially, and culturally. Since then, the demographics of the area have changed, the locations of employment centers have changed, and the number of available mobility options has changed. As a result, R G R T A launched an initiative called “Reimagine RTS” to redesign the fixed route system. Stage 1 of the project involved a wide variety of stakeholders. This included RTS customers and employees, business partners, community and neighborhood organizations, advocacy groups, elected officials, business owners, community members, potential future customers, and residents of Monroe County.

To assist with technical analysis and community engagement during Stage 1, RTS engaged the services of a consulting team comprised of Transportation Management & Design, Inc. (TMD) and Highland Planning. TMD completed a study and provided recommendations for the redesigned system. R G R T A shared a draft of TMD’s recommendation to get feedback from the community. R G R T A conducted outreach to the community throughout Stage 1 to ensure customers, employees and stakeholders were involved, and that their priorities were represented in TMD’s recommendation.

This Plan will compare the redesigned RTS fixed route service and resulting RTS Access complementary paratransit service.

## 1.2. Description of Redesigned RTS Fixed Route Service Effective in the Summer of 2020

This subsection describes the fixed route system as required in Subpart F, §37.139 (b) of the federal regulations.

The RTS campus is located at 1372 East Main Street, Rochester NY 14609 (Monroe County). The campus facilities house the RTS staff, maintain the RTS fleet, and function as R G R T A headquarters. The RTS Transit Center is located at 60 St. Paul Street, Rochester, NY 14604 (Monroe County) and serves RTS buses.

The redesigned fixed-route system will offer the following features.

1. Routes that run north to south and from east to west; and
2. Ten corridors with 15-minute bus service between 6:00 AM and 6:00 PM during the week; and
3. Coverage that is consistent because all routes that run during the week will also run on the weekend; and

Leading up to the Summer of 2020, the RTS Fixed Route service offered the following service types: Urban All Day, Express Transfer, ROC-it, Urban Supplemental, and Suburban. These types will not exist in the redesigned system. RTS will provide fixed-route service within the core network service area. The fixed-route system will feature Short Line trips, Long Line trips, Crosstown routes, and Commuter routes. RTS will continue to provide service that accommodates the needs of school students and personnel within the redesigned network. The system will also feature Connection Hubs and Community Mobility Zones (“zones” or “CMZ”). RTS will provide demand responsive service within the CMZs.

### 1.2.A. Short Line Trips

Short Line trips provide increased frequency for part of a popular route with high ridership. An example is the portion of Lake Avenue between the RTS Transit Center and Eastman Business Park. The system has 4 Short Line routes.

### 1.2.B. Long Line Trips

Long Line Trips travel the entire portion of the route. For example, the full trip on Lake Avenue runs between the RTS Transit Center to Charlotte Beach.

### 1.2.C. Crosstown Routes

Crosstown routes connect communities without traveling downtown. These routes do not serve the RTS Transit Center but connect with many other routes than do. The redesigned system has three Crosstown routes: the Ridge Road Crosstown, the Culver Road Crosstown, and the Lyell Upper Falls Crosstown.

### 1.2.D. Commuter Routes

Commuter bus service means fixed route bus service, characterized by service that runs predominantly in one direction during peak periods, limited stops, and routes of extended length, usually between the central business district and outlying suburbs. The commuter service transports customers to connection hubs, where they can transfer to fixed-route service. Under § 37.121(c), commuter bus services are not subject to the requirement to provide complementary paratransit service.

### 1.2.E. Frequent Network Service

Frequent service is fixed route service that arrives every 15 minutes. The redesigned system has a frequent network of 10 corridors that provide 15-minute service all-day on weekdays.

During weekdays the corridors have an Early AM frequency of 30 minutes, an AM Peak frequency of 15 minutes, a Midday frequency of 15 minutes, a PM Peak frequency of 15 minutes, and an Evening frequency of 30 minutes.

During weekends, the corridors have an Early AM frequency of 60 minutes, a Day frequency of 30 minutes, and an Evening frequency of 60 minutes.

### 1.2.F. Local Service

Local service is fixed route service that supplements the frequent network. Local service operates every 30 minutes on weekdays, offering the potential to connect with every other trip within the frequent network.

The local service route traveling between the Transit Center and Fairport has a weekday and weekend frequency of 90 minutes for all times of day (Early AM, AM Peak, Midday, Day, PM Peak, and Evening).

All other routes have an Early AM and Evening Frequency of 60 minutes on weekdays and weekends.

All other routes have an AM Peak, Midday, and PM Peak frequency of 30 minutes on weekdays.

On weekends, 5 local service routes have a Day frequency of 30 minutes and 15 local service routes have a Day frequency of 60 minutes.

### 1.2.G. Community Mobility Zones

Community Mobility Zones, (or “CMZs”) are areas that will be served through RTS on-demand, RTS flex, or a personal mobility on-demand service rather than RTS fixed route service. The Community Mobility Zones exist in the following areas surrounding the City of Rochester: Brockport, EastView, Greece, Henrietta, Irondequoit, Lexington Avenue (City of Rochester), and Webster. More details are provided in Exhibit 2.

### 1.2.H. Connection Hubs

A Connection Hub is a shelter where customers may transfer between multiple RTS routes or transition to and from the RTS fixed route system. A customer can use demand responsive service in a CMZ to travel to the hub and then pick up RTS fixed route service (and vice versa). More details are provided in Exhibit 2.

The following connection hubs are in the planning stages: 1) a hub near Rochester Technology Park to allow transition to and from the Brockport CMZ; and 2) a hub near Concentrix Corporation to allow transition to and from the Pittsford and Eastview CMZ; and 3) a hub near Eastman Business Park to allow transition to and from the Greece CMZ and the Lexington CMZ; and 4) a hub near Marketplace Mall to allow transition to and from the Henrietta CMZ; and 5) a hub near Irondequoit Plaza to allow transition to and from the Irondequoit CMZ and a hub near Skyview Plaza, which will operate during the season when Seabreeze is open and provide access to several routes, including seasonal route to Seabreeze Amusement Park; and 6) a hub near BayTowne Plaza to allow transition to and from the Webster CMZ.

### 1.2.I. Days and Hours of Service for Fixed Route

RTS fixed route service runs from 5:00 AM to midnight on weekdays, from 6:00 AM Saturday morning to midnight Sunday, and from 6:00 AM Sunday morning to midnight Monday.

Weekdays from 5:00 AM to 6:00 AM, routes on the frequent network will run every 30 minutes and routes on the local service will run every 60 minutes.

Weekdays from 6:00 AM to 6:00 PM, routes on the frequent network will run every 15 minutes and routes on the local service will run every 30 minutes.

Weekdays from 6:00 PM to midnight, routes on the frequent network will run every 30 minutes and routes on the local service will run every 60 minutes.

Weekends from 6:00 AM to 7:00 AM, routes on the frequent network and the local service will run every 60 minutes.

Weekends from 7:00 AM to 6:00 PM, routes on the frequent network will run every 30 minutes and routes on the local service will run every 60 minutes.

Weekends from 6:00 PM to midnight, routes on the frequent network and the local service will run every 60 minutes.

The RTS Transit Center facility is open Monday through Friday from 4:30 AM to midnight and Saturday to Sunday from 5:30 AM to midnight.

The Customer Information Desks at the RTS Transit Center have staff available on Monday through Friday from 6:15 AM to 7:45 PM.

The RTS Administration Building lobby is open to the public Monday through Friday from 8:00 AM to 5:00 PM and closed on weekends and holidays.

The RTS Customer Service Center Representatives are available Monday through Sunday from 5:00 AM to midnight.

### 1.2.J. Fare Structure for Fixed Route

The base cash fare is one dollar. When boarding an RTS bus, you must pay a separate fare unless you have a pass for multiple rides.

Senior citizens age 65+ must show the Bus Operator a photo ID, Medicare Card, or a Reduced Fare Card to obtain a reduced rate of $0.50. Senior citizens age 90 or older can apply for an RTS Lifetime Pass, which allows them to ride fixed route free of charge.

Disabled persons who are not certified paratransit eligible must show the RTS Bus Operator a Reduced Fare Card for the reduced rate of $0.50.

Certified paratransit eligible customers must show their RTS Access ID Smartcard to the RTS Bus Operator or tap the smartcard on the RTS bus fare box to ride free of charge.

Children age five and under ride free with a limit of three children per each fare-paying adult.

RTS does not charge fare for service animals traveling with their handlers or pets traveling with their owners (pets must be in carriers).

Customers can purchase fare media at authorized points of distribution, at the RTS Administration Building, and at ticket vending machines in the Transit Center. Customers with smartphones and access to a credit card or bank account can purchase fare using a mobile ticketing application.

#### Cash Fares

Cash fares are paid at the time of boarding directly at the fare box. Bus Operators do not handle money or dispense change. The fare box accepts coins and $1, $5, $10, and $20 bills. The fare box no longer dispenses change cards.

* Adult cash fare is $1.00
* Children age 12 and over cash fare is $1.00.
* Children age 6 – 11 cash fare is $0.50.
* Senior citizen cash fare is $0.50 (individuals 65+ with photo ID, Medicare card, or Reduced Fare card)
* Disabled cash fare is $0.50 (with Reduced Fare card)

#### Other Fare Media: Tap & Go Cards, Store Value Cards, Reusable Smartcards, Mobile or Printed Tickets

Customers can purchase fare media at authorized points of distribution, online at [www.myRTS.com](http://www.myRTS.com), at the reception desk or at the ticket vending machine in the RTS Administration Building, and at ticket vending machines in the Transit Center. Customers with smartphones and access to a credit card or bank account can purchase fare using a mobile ticketing application.

* 31 Day is $56.00.
* 31 Day Senior/Disabled is $28.00.
* All Day is $3.00.
* All Day Senior/Disabled is $1.50.
* 5 Day is $14.00.
* 5 Day Senior/Disabled is $7.00.
* 1 Ride is $1.00.
* Senior/Disabled 1 Ride is $0.50.
* Stored Value Pass is $10.00 when purchased online. Stored Value Passes can be purchased in $5, $10, $15, $20 at ticket vending machines.

End of List

### 1.2.K. Accessibility for Fixed Route

The regulation 49 CFR A Part 37, Subpart G – Provision of Service covers the topic of fixed route accessibility. The description in this Plan is included for comparing RTS with RTS Access.

RTS fixed route service complies with the A D A accessibility requirements because 100% of its vehicles are accessible and all new routes are accessible. The municipality, rather than R G R T A, often determines the accessibility to the area (i.e. curbing, crosswalk, concrete pad) where a bus stop is located.

All 220 RTS fixed route buses are accessible. They accommodate wheelchairs and other mobility devices. They are equipped with ramps; are equipped with “kneelers” that lower the bus to ground level; and are equipped with audio and visual stop announcements to assist customers who are blind, deaf, hard-of-hearing, or have low vision.

RTS offers free training to people who would like to learn about using fixed route service. The Enjoy the Ride Ambassador program helps make riding the bus easy, safe and efficient. The program shows people how to plan a bus trip, where to locate schedule and route information, how to pay and purchases passes, and more.

The Enjoy the Ride Ambassador Program provides supportive information for non-driving mature adults and young people. The program can help individuals supplement paratransit services with regular bus service, and help with transitioning from paratransit services to regular bus service. There is no charge for this program, which can be customized to meet specific needs. For more information, contact RTS at (585) 654-0739.

Priority seats are at the front of RTS buses for seniors and people with disabilities. RTS requires Bus Operators to ask other customers to offer these seats to seniors and people with disabilities. However, Bus Operators are not obligated to compel a person to move.

RTS buses have areas reserved where people who need mobility devices can secure their mobility devices during the ride. RTS requires Bus Operators to ask customers to provide access to those areas for people using mobility devices. Shopping carts, bicycles, and skateboards are not mobility devices. Examples of mobility devices include manual wheelchairs, motorized wheelchairs, walkers, canes, or crutches.

Bus Operators will position and lower (“kneel”) RTS buses to make boarding as easy as possible for everyone. Customers can request the lift or ramp at any RTS bus stop. Bus Operators will ask customers to stay 4 to 5 feet back to allow the ramp to lower.

Operators are required to secure all mobility devices. It is the Bus Operator’s responsibility to verify that the securement and release of a mobility device is performed properly for the safety of all. If an aide, personal care attendant (PCA), or other customer performs the securement or release, please ask the Bus Operator to oversee or check it. Mobility devices must be secured with 3-4 point securements anytime they are on the bus.

RTS encourages customers to use the shoulder and lap belt securement for their safety. Bus Operators are trained to ask customers in mobility devices if they would like assistance with securing the shoulder and lap belt (vehicle seat belt). However, Bus Operators must not apply the vehicle seatbelt to people in mobility devices if the customer declines it or it is not possible to secure the mobility device to the satisfaction of both parties. For safety, RTS encourages customers to lock manual wheelchairs or to turn off automated / motorized mobility devices. Per A D A, however, RTS will provide transportation to wheelchair users even if 1) the device does not have brakes; or 2) the user chooses to leave the wheelchair unlocked; or not to set the brakes; or to leave the device turned on.

A stop request button is on the flipped up seat (priority seating). Pressing the button will notify the Bus Operator that a person with a mobility device will need to disembark. Customers who need to use the ramp will disembark from the front doors of the bus.

RTS continues to improve the accuracy and consistency of its onboard route announcements (automated vehicle annunciation).

## 1.3. Description of Complementary A D A Paratransit Service Effective Summer 2020

This subsection describes the paratransit services that will go into effect in the Summer of 2020 and as required in Subpart F, §37.139 (c) of the federal regulations.

Created in 1985, RTS Access provides a transportation option for eligible individuals whose disabilities prevent them from using the fixed route system in accordance with the A D A and its implementing regulations. RTS Access provides paratransit services to complement the fixed route services of RTS in Monroe County. The operations and administrative headquarters for RTS Access are located on Trabold Road in the Town of Gates. The annual ridership is 198,640. RTS Access operates 53 buses and has 113 employees. The service area population is 747,727. The types of complementary paratransit service are origin-to-destination service, subscription service, same-day service, and supplemental service.

### 1.3.A. Origin-to-Destination Next-Day Service

The RTS Access service area mirrors the redesigned RTS service area. Paratransit trips occur within the RTS Access service area. By default, RTS Access will pick up and drop off customers at the curb, and provide assistance beyond the curb only on an as-needed basis. Customers who anticipate an occasional need for assistance beyond the curb to reach their destinations may request it when making a reservation.

Applicants who anticipate a regular need for assistance beyond the curb to reach their destinations may notify the A D A Certification Coordinator when applying for paratransit eligibility certification or recertification. Those who are already certified paratransit eligible may discuss this need with an RTS Access Scheduler or with the A D A Certification Coordinator.

If the need for assistance beyond the curb occurs during a ride, customers may ask the Bus Operator for assistance and the Bus Operator will follow the process for reasonable modifications. RTS Access will aim to accommodate requests but will direct Bus Operators to decline requests that would fundamentally alter the nature of the paratransit service, create undue burdens, or present direct threats to safety. RTS Access will direct Bus Operators to decline requests for personal services such as those a personal care attendant provides.

RTS Access requires customers to reserve their trips. RTS Access is required to provide customers with the ability to reserve a trip for the next day. To reserve a ride for the next day, customers must contact RTS Scheduling on Monday through Sunday between 8:00 AM and 5:00 PM. Customers have the option to reserve a ride up to five days in advance for trips in the Required Area, and Level 1, and Level 2 of the paratransit service area.

### 1.3.B. Subscription Service

Subscription service allows customers to reserve a schedule of repeat trips to the same location at the same time of day. The fare for a trip provided through Subscription service is identical to the fare of an individually scheduled trip. In the paratransit service area, subscription trips are available in the Required Area, Level 1, and Level 2. The full Paratransit Trip Subscriptions policy is in Exhibit 4.

### 1.3.C. Same-day Service

Customers may reserve a trip for later that same day. Same-day service is provided for an added cost and only if space is available. RTS Access will expect customers who wish to use the same-day service to accept the possibility of unavailable space when attempting to reserve a trip and pay the same-day rate upon boarding for the bus for a scheduled same-day trip. Refer to Subsection 2.4.C Fares for details on the same-day fare.

### 1.3.D. Supplemental Service

RTS Access provides three levels of supplemental service. Each level extends the physical geographic paratransit service area.

We suggest using the following interactive online map at <https://arcg.is/0unvvv> along with other resources available to you such as assistive technologies or friends, family, attendants, in order to better understand where points of interest (addresses) are in the proposed areas.

Level 1 supplemental service provides paratransit service to the geographic area ¾ miles beyond the ¾-mile Required Area, for a total service area of 1 and ½ miles. Trips in Level 1 are provided at the same cost of $2. RTS Access will make its best effort to deliver the same service criteria for Level 1 as it does in the Required Area. This includes allowing customers to negotiate pickup times and reserve rides up to five days ahead, and guaranteeing a ride with a one-day advance reservation. The weekday service hours for Level 1 are Monday through Friday from 5:00 AM to midnight. The weekend service hours for Level 1 are Saturday and Sunday from 6:00 AM to midnight and include holidays. Subscription trips are available in Level 1.

Level 2 supplemental service will serve the geographic areas for portions of the Community Mobility Zones that are not covered by the Required Area or Level 1. The supplemental service for origins and destinations in Level 2 costs $5 per trip. RTS Access will make its best effort to deliver the same service criteria for Level 2 as it does in the Required Area. This includes allowing customers to negotiate pickup times and reserve rides up to five days ahead, and guaranteeing a ride with a one-day advance reservation. The weekday service hours for Level 2 are Monday through Friday from 5:00 AM to 7:00 PM, excluding holidays. The supplemental service for Level 2 does not run on weekends. There is no charge if paratransit customers present their RTS Access ID and ride RTS on-demand or RTS flex from a location in Level 2 to a location in Level 1 or the Required Area, where the customer has scheduled a pickup by RTS Access. Subscription trips are available in Level 2.

Level 3 supplemental service will be in a set geographic area which is 1.25 miles around the Required Area and/or Level 2 at the time of R G R T A Board approval of the Paratransit Plan for 2020. Note, however, that the Level 3 geographic area will not be subject to change, either smaller or larger, in the event of potential subsequent changes in the Required Area and/or Level 2. The supplemental service in Level 3 will be provided only if space is available after accommodating requests for service within the Required Area, Level 1, and Level 2. RTS Access will expect customers to accept the possibility of unavailable space when attempting to reserve a trip to an origin or destination in Level 3, and pay the supplemental rate upon boarding the bus. Reservations can be made up to 1 day in advance only and trips are not guaranteed. The weekday service hours for Level 3 are Monday through Friday from 5:00 AM to 7:00 PM, excluding holidays. The supplemental service for Level 3 does not run on weekends. Subscription trips are not available in Level 3.

Exhibit 3 of the Plan describes the paratransit service area, including the geographic areas served by the supplemental services in Level 1 (Regular), Level 2, and Level 3.

### 1.3.E. Days and Hours of Service

RTS Access days and hours of service will emulate those of RTS fixed route service. More details are in Subsection 2.4.A Service Area and Subsection 2.4.B Responding to Requests for Rides (Response Time) of this Plan.

### 1.3.F. Fare Structure

With the exceptions of supplemental service for Level 2 and Level 3 and same-day service, RTS Access will charge customers riding within the regular A D A paratransit service area no more than twice the fare it charges an individual paying full fare for a trip of similar length, at a similar time of day on the RTS fixed route. Details are in Subsection 2.4.C Fares.

## 1.4. Other Service

For a description of other paratransit service in the same geographic area as RTS Access, please refer to Subsection 6.2 Survey of Existing Paratransit Service.

## 1.5. Accessible Formats and Language Assistance

It is particularly important for RTS Access to provide information to people with disabilities in a format that they can use. RTS Access is committed to communicating in the appropriate formats, especially when the information is time-sensitive such as eligibility certification, recertification reminders, warnings, suspension notices, or information related to appeals. RTS Access will use a Customer Relationship Management (CRM) system to track accessible formats that paratransit customers are able to use and provide the appropriate formats consistently.

People can call 585-654-0608 to discuss or request accessible formats for RTS Access information. People can contact RTS Customer Service to request accessible formats for information about RTS service (fixed route) at 585-288-1700 and TTY 585-654-0210. Another way to send a request is to use the online Contact Us form available at <https://www.myrts.com/Contact-Us>.

RTS is pleased to provide its customers with access to Language Line Personal Interpreter Services as an efficient way for non-English speaking customers to communicate with Customer Service Representatives and RTS Access Schedulers during business hours. This is a free service.

Call 585-288-1700 for RTS Customer Service Monday through Friday, 7:00 AM to 6:00 PM. Call 585-654-0747 for RTS Access Operations Monday through Friday, 8:00 AM to 5:00 PM. Operations will coordinate the connection between the interpreter, the customer, and a Scheduler.

End of Section 1

Exhibits for Section 1

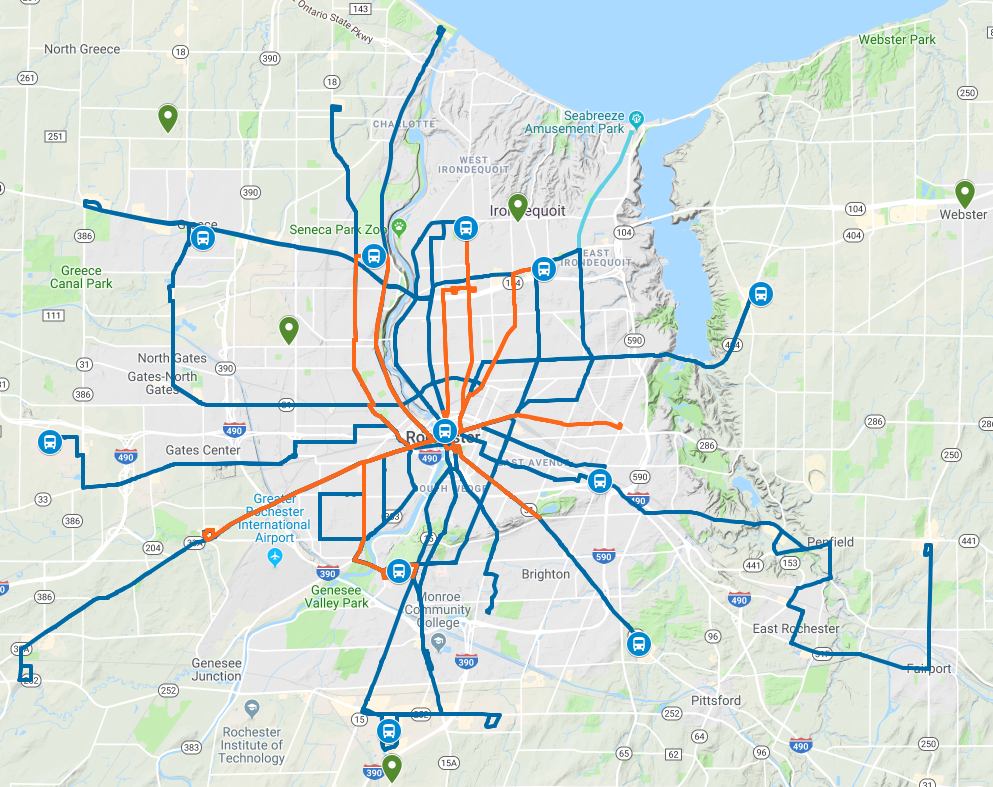
The exhibits included in Section 1 are Exhibit 1: Reimagine RTS Fixed Route System Description, Exhibit 2: Reimagine RTS Demand Responsive Services for Community Mobility Zones; Exhibit 3: Reimagine RTS Access Paratransit Service Area Description, and Exhibit 4: Paratransit Trip Subscriptions.

Exhibit 1: Reimagine RTS Fixed Route System Description

The RTS Fixed Route System map for Summer of 2020 is available online at the following site location:

<https://reimagine.myrts.com/transit-plan/>

Historically, the fixed route system was a radial network where all routes went downtown to the RTS Transit Center. The redesigned network is more similar to a grid, with the introduction of two new crosstown routes. However, the current street network and natural barriers like the Genesee River limit the ability to implement a true grid system. The redesigned network respects current travel patterns while creating new opportunities for faster trips using new transfers available in the radial/crosstown connections.



Descriptions of the Redesigned Fixed Routes

Service Tiers

Routes within the Frequent Service tier have buses that operate every 15 minutes during weekdays (AM Peak, Midday, and PM Peak). Routes within the Local Service tier have buses that operate every 30 minutes during weekends (AM Peak, Midday, and PM Peak) excluding the route operating between the Transit Center and Fairport (buses operate every 90 minutes).

Long Line, Short Line, Crosstown, and Commuter

Long Line Trips travel the entire length the route. Short Line trips provide increased frequency for part of a popular route with high ridership. Crosstown routes connect to other fixed routes without traveling downtown to the Transit Center. Commuter routes are routes of extended length that run in one direction between connection hubs and outlying suburbs. At the connection hubs, customers can transfer to fixed-route service.

Route Descriptions

RTS will change the fixed route numbers for the Summer of 2020. This description uses the old route numbers to give customers context for the new system.

1 Lake

The new route is in the Frequent Service tier and offers short line and long line service. The short line runs from the RTS Transit Center to Ridge Road every 15 minutes from 6:00 AM to 6:00 PM on weekdays, and every 30 minutes all other times. The long line continues to Charlotte every 30 minutes.

3 Lyell

The new route absorbs the Route 163 Lyell ROC-it and is in the Local Service tier. It runs from the RTS Transit Center to Greece Ridge Mall every 30 minutes from 6:00 AM to 6:00 PM on weekdays. It connects to frequent service on the new 8 Chili for Walmart-bound customers.

Lyell Upper Falls Crosstown

The new route provides frequent service. It provides an east-west crosstown connection closer to the city center with service along Lyell Avenue every 15 minutes. It also connects to downtown by way of the new routes for the 3 Lyell, 10 Dewey, 1 Lake, 35 St. Paul, 37 North Clinton, 41 Joseph, 34 Hudson, 40 Portland, and 103 Webster.

4 Genesee

The new route is in the Frequent Service tier. It runs between the RTS Transit Center and Strong Hospital every 15 minutes from 6:00 AM to 6:00 PM on weekdays, and every 30 minutes all other times.

6 Jefferson

The high-ridership segments of the old 6 Jefferson are now included in the new routes for 19 Plymouth and 25 Thurston/MCC. Frequent service is available nearby on the new 4 Genesee and 8 Chili.

8 Chili

The new route is in the Frequent Service tier and offers short line and long line service. The short line runs from the RTS Transit Center to the Chili Walmart every 15 minutes from 6:00 AM to 6:00 PM on weekdays. The long line continues to the Cedars of Chili every 30 minutes on weekdays. On weekends, the frequency is 30 minutes for all trips and all trips extend from the Transit Center to the Cedars of Chili.

9 Jay and Maple

The new route is in the Local Services tier. All trips extend to Rochester Tech Park. All trips go to Jay Street between Broad and Child, and Maple Street between Child and Mount Read.

10 Dewey

The new route absorbs the Route 150 Dewey ROC-it. The new route is in the Frequent Service tier and offers short line and long line service. The short line runs from the RTS Transit Center to Eastman Business Park every 15 minutes from 6:00 AM to 6:00 PM on weekdays. The long line continues to the Dewey Walmart every 30 minutes on weekdays. On weekends, the frequency is 30 minutes.

13 Edison

The Lexington Avenue CMZ replaces the route. Fixed route service will operate to Edison Tech as a route available to the public but designed to accommodate the needs of school students and personnel. The Lexington CMZ offers RTS on-demand service 6:00 AM to 7:00 PM during weekdays only. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight during weekdays only.

14 Ridge

The Ridge Road Crosstown route replaced the route. The new route provides a direct connection between Greece and Irondequoit. Direct service from the RTS Transit Center to Greece Ridge Mall is available on the Route 3 Lyell.

15 Latta

The route is obsolete. In the new system, customers are served on the new routes for the 1 Lake and 10 Dewey.

16 Crosstown

The Lexington Avenue CMZ replaces the route. The Lexington CMZ offers RTS on-demand service 6:00 AM to 7:00 PM during weekdays only. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight during weekdays only.

##### 19 Plymouth

The new route is in the Local Service tier. The route will serve Ford Street and Plymouth Avenue, providing direct service between the RTS Transit Center and Strong Hospital. The route also goes to the Hall of Justice via Broad Street.

23 Jefferson

The route is obsolete. In the new system, customers are served on the new routes for 24 Marketplace and Culver Crosstown. Service to Monroe Community College is available on the new routes for 25 Thurston/MCC, 45 South, and Culver Crosstown.

24 Marketplace

The new route absorbs the Route 124 Marketplace ROC-it and is in the Local Service tier. It provides service to West Henrietta Road and Jefferson Road via Marketplace Mall. The weekday frequency is 30 minutes and weekend frequency is 60 minutes. The fixed route connections to Monroe Community College (MCC) and the Rochester Institute of Technology (RIT) are gone; customers can use the RTS on-demand service in the Henrietta CMZ 6:00 AM to 7:00 PM Monday to Sunday and holidays. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight Monday to Sunday and holidays.

25 Thurston/MCC

The new route is in the Local Service tier. It serves Jefferson Avenue between Main Street and Plymouth Avenue before proceeding to Strong Hospital and Monroe Community College (MCC) via the Arnett, Thurston, and Brooks loop. On weekends, the service runs every 60 minutes.

28 Genesee Park/Strong

The route is obsolete. In the new system, customers are served on the Route 8 Chili and Route 25 Thurston/MCC.

31 Park

The route is in the Local Service tier. The route operates between the Transit Center and Blossom Loop by way of Park Avenue. Customers can use the new route for 47 Monroe to access the connection hub in the Pittsford and Eastview CMZ. In the Pittsford and Eastview CMZ, customers can use RTS flex or PMOD service to travel to or from St. John Fisher College and Nazareth College. The hours of service for RTS flex are 6:00 AM to 7:00 PM Monday through Sunday. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and from 7:00 PM to midnight Monday to Sunday.

33 Goodman

The new route in the Local Service tier. It runs between the RTS Transit Center and Skyview on the Ridge. The route does not run north of Ridge Road or deviate to St. Ann's. Customers can get to Irondequoit Plaza using the Route 34 Hudson, the Route 35 St. Paul, and the Route 37 North Clinton. Customers traveling north of Ridge Road can use RTS on-demand or PMOD service within the Irondequoit CMZ. RTS on-demand service runs 6:00 AM to 7:00 PM Monday to Sunday and holidays. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight Monday to Sunday and holidays.

34 Hudson

The new route is in the Frequent Service tier. It runs on weekdays every 15 minutes from 6:00 AM to 6:00 PM. At all other times, the route runs every 30 minutes. The route absorbs the 134 Hudson ROC-it and does not deviate to Carter Street or Hudson Ridge Towers.

35 St. Paul

The new route is in the Local Service tier. It runs between the RTS Transit Center and Irondequoit Plaza via St. Paul Street every 30 minutes on weekdays between 6:00 AM and 6:00 PM. It runs every 60 minutes all other times. Customers traveling north of Titus Avenue can use RTS on-demand or PMOD service within the Irondequoit CMZ. RTS on-demand service runs 6:00 AM to 7:00 PM Monday to Sunday and holidays. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight Monday to Sunday and holidays.

36 Clifford

The route is obsolete. In the new system, customers can use the new route for 103 Webster to travel between the Transit Center and Culver Road.

37 North Clinton

The new route is in the Local Service tier. It runs between the RTS Transit Center and Irondequoit Plaza via North Clinton Avenue every 30 minutes between 6:00 AM and 6:00 PM on weekdays. It runs every 60 minutes all other times. Customers traveling north of Titus Avenue can use RTS on-demand or PMOD service within the Irondequoit CMZ. RTS on-demand service runs 6:00 AM to 7:00 PM Monday to Sunday and holidays. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight Monday to Sunday and holidays.

38 East Main

The new route is in the Frequent Service tier. It runs between the RTS Transit Center and Landing Heights via East Main Street every 15 minutes between 6:00 AM and 6:00 PM on weekdays. It runs every 30 minutes all other times.

Route 39 Bay/Webster

The route is obsolete. In the new system, customers can use the new routes for 33 Goodman, 38 East Main, 103 Webster, and Culver Crosstown.

40 Portland

The new route is in the Frequent Service tier. It runs every 15 minutes between 6:00 AM and 6:00 PM on weekdays and runs every 30 minutes. It travels to the connection hub near Skyview on the Ridge in the Irondequoit CMZ. Customers can use RTS on-demand or PMOD service within the Irondequoit CMZ. RTS on-demand service runs 6:00 AM to 7:00 PM Monday to Sunday and holidays. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight Monday to Sunday and holidays.

42 Parsells

The route is obsolete. In the new system, customers can use the Culver Crosstown. There is a connection hub near Skyview on the Ridge. The Culver Crosstown fixed route service travels into the Irondequoit CMZ and connects to a seasonal route traveling along Culver Road to Seabreeze Amusement Park. Customers can use RTS on-demand or PMOD service within the Irondequoit CMZ. RTS on-demand service runs 6:00 AM to 7:00 PM Monday to Sunday and holidays. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight Monday to Sunday and holidays. In the new system, customers can also use the new route for 103 Webster to travel along Empire Boulevard and Ridge to the connection hub near BayTowne Plaza to access the Webster CMZ. Customers can use RTS flex and PMOD service within the Webster CMZ. The hours of service for RTS flex are 6:00 AM to 7:00 PM Monday through Sunday. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and from 7:00 PM to midnight Monday to Sunday.

45 South

The new route is in the Local Service tier and absorbs the 55 MCC Brighton and 145 South ROC-it. It runs between the RTS Transit Center and Monroe Community College by way of the Monroe Community Hospital. The new route does not travel to Strong Hospital. Customers can use the new routes for 4 Genesee, 19 Plymouth, and 24 Marketplace, 25 Thurston/MCC, or Culver Crosstown. Customers traveling to MCC can also use the new routes for 25 Thurston/MCC and Culver Crosstown.

47 Monroe

The new route is in the Frequent Service tier and offers short line and long line service. The short line runs between the RTS Transit Center and Highland Avenue every 15 minutes from 6:00 AM to 6:00 PM on weekdays. The long line continues to Pittsford Plaza every 30 minutes from 6:00 AM to 6:00 PM on weekdays. On weekends, the frequency is 30 minutes for all trips. Customers traveling beyond Pittsford Plaza can use the RTS flex and PMOD service within the Pittsford and Eastview CMZ. The hours of service for RTS flex are 6:00 AM to 7:00 PM Monday through Sunday. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and from 7:00 PM to midnight Monday to Sunday.

Route 48 University

The new route is in the Local Service tier and serves University Avenue between the RTS Transit Center and the Blossom Loop. At Winton Road, customers can connect to the new routes for 31 (Park) and 81 (Fairport). Customers along Winton Road and Elmwood Avenue can connect to Twelve Corners and URMC using the new routes for 47 Monroe, 51 South Clinton, and Culver Crosstown.

51 South Clinton

The new route is in the Local Services tier. It runs between the RTS Transit Center and the Jewish Home by way of Clinton Crossings every 30 minutes on weekdays and every 60 minutes on weekends. The new route does not serve the Monroe Developmental Center but does travel eastbound on Westfall Road to the Jewish Home.

53 South Goodman

The route is obsolete. In the new system, customers are served on the new routes for 51 South Clinton and Culver Crosstown.

55 MCC Brighton

The route is obsolete. In the new system, customers are served on new route for 45 South. Customers can get to Mount Hope Avenue by way of the new route for 24 Marketplace.

57 East

The route is obsolete. In the new system, customers are served on the new routes for 31 (Park) and 48 (University).

81 Fairport

The new route is in the Local Service tier and absorbs the 82 Penfield. It travels between the Blossom Loop and East Rochester, Fairport, and Penfield. The route runs every 90 minutes all day on weekdays and weekends. Customers can connect to downtown by way of the new routes for 31 (Park) or 48 (University).

82 Penfield

The route is obsolete. In the new system, customers are served on new route for 81 Fairport.

83 Calkins

The route is obsolete. In the new system, customers are served on the new route for 45 South along South Avenue, and on the Culver Crosstown along East Henrietta Road. Customers traveling south of Jefferson Road can use the RTS on-demand service in the Henrietta CMZ 6:00 AM to 7:00 PM Monday to Sunday and holidays. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight Monday to Sunday and holidays.

84 Eastview

The route is obsolete. In the new system, customers can use the new route 47 Monroe to get to the connection hub near Concentrix Corporation to access the Pittsford and Eastview CMZ. Within the CMZ, customers can use RTS flex from 6:00 AM to 7:00 PM Monday through Sunday. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and from 7:00 PM to midnight Monday to Sunday

101 Avon/Rush

The new route is a commuter route. In the new system, customers commuting from Avon and Rush will have service to the connection hub near Marketplace Mall and can transfer to the new route for 24 Marketplace or the Culver Crosstown. Customers along South Avenue can use the new route for 45 South, and customers along East Henrietta Road can use the Culver Crosstown.

102 Newark/Lyons

The new route is a commuter route. In the new system, customers commuting from Newark and Lyons will have service to the connection hub near Concentrix Corporation in Pittsford and can transfer to the new route for 47 Monroe. Customers can also use RTS flex or PMOD service within the Pittsford and Eastview CMZ. RTS flex runs from 6:00 AM to 7:00 PM Monday through Sunday. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and from 7:00 PM to midnight Monday to Sunday.

103 Webster

The new route is in the Local Service tier and absorbs the 36 Clifford. It runs between the RTS Transit Center and BayTowne Plaza via Clifford Avenue and Empire Boulevard every 30 minutes on weekdays and every 60 minutes on weekends. Customers traveling beyond BayTowne Plaza can use RTS flex and PMOD service within the Webster CMZ. The hours of service for RTS flex are 6:00 AM to 7:00 PM Monday through Sunday. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and from 7:00 PM to midnight Monday to Sunday.

104 Brockport

The route is obsolete. In the new system, customers can travel between the Transit Center and Rochester Tech Park, or use RTS Flex and PMOD service within the Brockport CMZ. RTS flex runs from 6:00 AM to 10:00 PM during weekdays and 6:00 AM to 7:00 PM on weekends and holidays. Personal mobility on-demand (PMOD) service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 10:00 PM to midnight during weekdays and from 7:00 PM to midnight on weekends and holidays.

106 Hilton

The new route is a commuter route. In the new system, customers commuting from Hilton will have service to the connection hub near Eastman Business Park. They can connect to the new routes for 1 Lake, 10 Dewey, or Ridge Crosstown.

ROC-It Routes

In the new system, the 124 Marketplace ROC-it is part of the new route for 24 Marketplace; the 134 Hudson ROC-it is part of the new route for 34 Hudson; the 145 South ROC-it is part of the new route for 45 South; the 150 Dewey ROC-it is part of the new route for 10 Dewey; and the Lyell ROC-it is part of the new route for 3 Lyell.

Seabreeze Seasonal

The new route is in the Local Service tier. It runs between Skyview on the Ridge and Seabreeze Amusement Park between Memorial Day and Labor Day. It runs every 30 minutes from 10:00 AM to 6:00 PM and every 60 minutes from 6:00 PM to 11:00 PM on weekdays and weekends.

Culver Crosstown

The new route is in the Local Service tier. It connects Irondequoit to Marketplace Mall by way of Strong Hospital and MCC. It runs east from Skyview on the Ridge to Culver, Parsells, Goodman, Elmwood, and Marketplace Mall. It provides connections to the new routes in the system for 4 Genesee, 10 Dewey, 19 Plymouth, 24 Marketplace, 25 Thurston/MCC, 31 Park, 33 Goodman, 38 East Main, 40 Portland, 45 South, 47 Monroe, 48 University, 51 South Clinton, Ridge Crosstown, and Seabreeze Seasonal.

Lyell Upper Falls Crosstown

The new route in the Local Service tier. It connects Lyell with Portland Avenue by way of Lyell Avenue and Upper Falls Boulevard. It provides an east-west crosstown connection closer to the city center with service along Lyell Avenue every 15 minutes. It also connects to downtown by way of the new routes for 3 Lyell, 10 Dewey, 1 Lake, 35 St. Paul, 37 North Clinton, 41 Joseph, 34 Hudson, 40 Portland, and 103 Webster.

Ridge Road Crosstown

The new route is in the Local Service tier. It runs to Elmridge Center in Greece and Skyview on the Ridge in Irondequoit by way of Ridge Road. It connects to the new routes in the system for 10 Dewey, 1 Lake, 34 Hudson, 40 Portland, and 41 Joseph. It also connects to the new local routes in the system for 3 Lyell, 35 St. Paul, 37 Clinton, 33 Goodman, and Culver Crosstown.

End of the Descriptions of the redesigned system routes.

Fixed Route Schedules

The RTS fixed route schedules effective as of Summer 2020 will be available online at the following site location:

<https://www.myrts.com/Maps-Schedules/RTS-Monroe/Schedule-pdfs>

If you have questions about using fixed routes or need an accessible format for a fixed route schedule, call 585-288-1700. A Representative is available Monday through Friday 7:00 AM to 6:00 PM. You can also tell Representatives about complaints or concerns while riding fixed route.

You can send requests or make comments anytime through the online Contact Us form available at this site location:

<http://rts.force.com/RTSContactUs>

End of Fixed Route Schedules

End of Exhibit 1

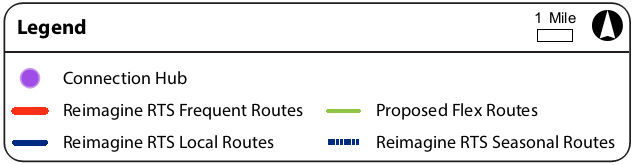
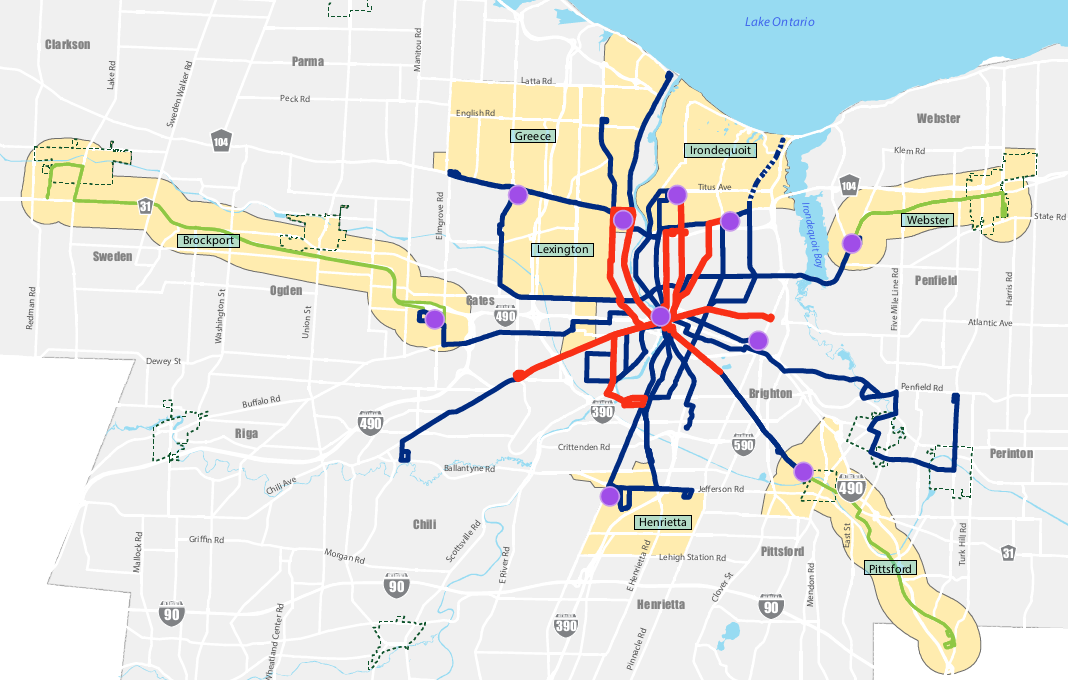
Exhibit 2: Reimagine RTS Demand Responsive Services for Community Mobility Zones

Demand Responsive Services

In the Community Mobility Zones (CMZs), customers will have the option of using one or more of the following demand responsive services: RTS on-demand, RTS flex, or a personal mobility on-demand service.

RTS On-Demand Service

RTS on-demand is a dial-a-ride service provided to the public on accessible vehicles. Dial-a-ride is a type of demand responsive service that operates in a CMZ area during set days and hours. Pickups and drop-offs can occur anywhere in the CMZ, so customers can arrange to travel to and from specific locations. Customers must make a request for service and arrange a pickup time. RTS will develop the schedules and routes for a particular day based on the requests. Customers can use RTS on-demand to arrange for transport from a location in the CMZ to a connection hub, where they can transfer to fixed route service or complementary paratransit to complete their trip the core network. When returning from the core network, customers use fixed route or paratransit to travel to a connection hub. Customers contact RTS to arrange for on-demand transport from the connection hub to their destination within the CMZ. While the demand responsive services like RTS on-demand do not require complementary paratransit service, the level of service provided to customers with disabilities and to customers without disabilities shall be equivalent. RTS on-demand is available in the following CMZs: Greece, Lexington, Henrietta, and Irondequoit.



RTS Flex Service

RTS flex is a route deviation service available to the public on accessible vehicles. Route deviation is a type of demand responsive service that operates along an established route in a CMZ area during set days and hours. The route has designated stops. Between the designated stops, vehicles deviate from the established route to pick up or drop off customers within a ¾ mile radius of the route. Customers must contact RTS to request an off-route pickup. A general recommendation is to call one to two hours in advance of the desired pickup time. Traveling between scheduled stops on the established route does not require a request in advance. Customers can use RTS flex to travel from a connection hub to a designated stop in the CMZ or request to be dropped off at a location up to ¾ miles off route in the CMZ. Customers can also use RTS flex to travel to a connection hub, where they can transfer to RTS fixed route service or complementary paratransit to complete their trip in the core network. When returning from the core network, customers use fixed route or paratransit to travel to a connection hub. Customers can transfer to RTS flex service and travel to a designated stop or request an off-route drop-off. While the demand responsive services like RTS flex do not require complementary paratransit service, the level of service provided to customers with disabilities and to customers without disabilities shall be equivalent. RTS flex is available in the following CMZs: Brockport, Pittsford/Eastview, and Webster.

Personal Mobility On-Demand Service

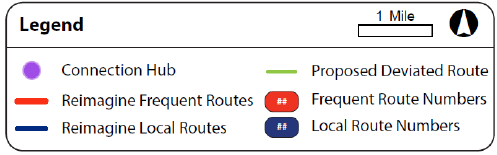
Personal mobility on-demand service (PMOD) is another type of demand responsive service. PMOD service is for individuals and small groups up to five persons traveling between various origins and destinations along a dynamic itinerary formed in response to customer reservations. PMOD service is an option for customers traveling within CMZs during hours when RTS flex and RTS on-demand are not in service.

Descriptions of Community Mobility Zones

Brockport Community Mobility Zone

The Brockport CMZ will provide service in areas affected by the proposed discontinuation of the current Route 104 Brockport in the towns of Ogden and Sweden and the villages of Brockport and Spencerport. This proposed 30.56 square-mile zone, the largest of the CMZs, focuses on the relatively more populated areas north of NY Route 31. This zone will provide an important link between Rochester and the College at Brockport, State University of New York campus (SUNY Brockport) through a transfer to the fixed route network at a Connection Hub located at the Rochester Tech Park in the Town of Gates. The Brockport CMZ offers RTS flex service starting at a connection hub near Rochester Technology Park in Gates and travels northwest along 531 and 31 through Ogden and continues to several destinations in Sweden. The CMZ boundary includes the Villages of Brockport and Spencerport. Key destinations in the CMZ include Rochester Tech Park, the Village of Spencerport, Lifetime Assistance, Frances Apartments, Woodlands Apartments, and retail on Owens Road, Brockport retail corridors, Sweden Senior Center, A.D. Oliver Middle School, the College at Brockport, and Brockport High School. The hours of service for RTS flex are 6:00 AM to 10:00 PM during weekdays and 6:00 AM to 7:00 PM on weekends and holidays. Personal mobility on-demand (PMOD) service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 10:00 PM to midnight during weekdays and from 7:00 PM to midnight on weekends and holidays.

Customers using RTS fixed route can take the local service route serving Jay and Maple to the connection hub near Rochester Technology Park. At the hub, customers can transfer to RTS flex or PMOD service to travel within the Brockport CMZ. Similarly, customers can use RTS flex or PMOD to reach the hub and transfer into the RTS fixed route service for trips to Jay Street between Broad and Child, and Maple Street between Child and Mount Read. Where Jay Street meets West Broad Street, customers can use bus stops to transfer to Short Line service to the Transit Center.

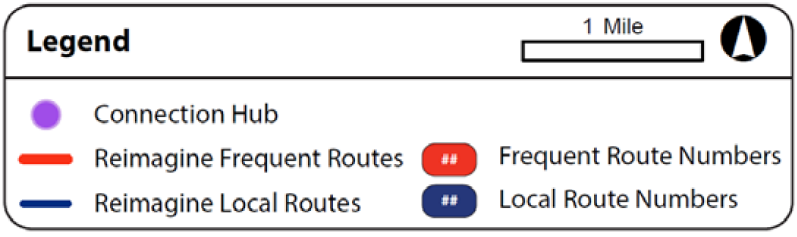


Greece Community Mobility Zone

The Greece Community Mobility Zone will provide service to residents and businesses in the town of Greece where 40-foot bus service has been determined to be infeasible. The 24.35 square-mile CMZ is bisected by the I-390 expressway and encompasses major retail locations such as The Mall at Greece Ridge and Northgate Plaza, as well as a site of higher education in Bryant & Stratton College. Several major roads define the boundary of the Greece CMZ. North Greece Road forms the west boundary; West Ridge Road forms the south boundary; Lake Avenue forms the east boundary; and Edgemere Drive, Dewey Avenue, and English Road form the north boundary. It is possible to connect to fixed route service on Lake Avenue and to the Port of Rochester and Ontario Beach Park area. In the Port of Rochester area, customers can connect to the Irondequoit CMZ. The Greece CMZ has a connection hub near Eastman Business Park. Key destinations in the CMZ include The Mall at Greece Ridge (with fixed route connections), Bryant and Stratton College, Kodak Park, Northgate Plaza, Affinity Orchard Apartments, Ridge Road retail corridor, Latta Road corridor, retail and shopping centers (Wegmans, Walmart), Ontario Beach and Charlotte recreation facilities, K-12 schools.

The Greece CMZ offers RTS on-demand service and PMOD service. The hours of service for RTS on-demand are 6:00 AM to 7:00 PM Monday to Sunday and holidays. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight Monday to Sunday and holidays.

The fixed route local long line service for Lake Avenue travels along the east boundary of the Greece CMZ to Ontario Beach Park. The fixed route local long line service on Dewey Avenue travels into the Greece CMZ and continues to the Dewey Walmart. The Crosstown fixed route service on West Ridge Road travels the west boundary between the Elmridge Center and the connection hub at Eastman Business Park. The fixed route local long line service for Lyell Avenue travels from the Transit Center to Lyell Avenue, and on to Spencerport Road, Long Pond Road, Parkridge near Park Ridge Hospital and Park Ridge Living Center, returns to Long Pond, and continues on West Ridge Road to Greece Ridge Mall.

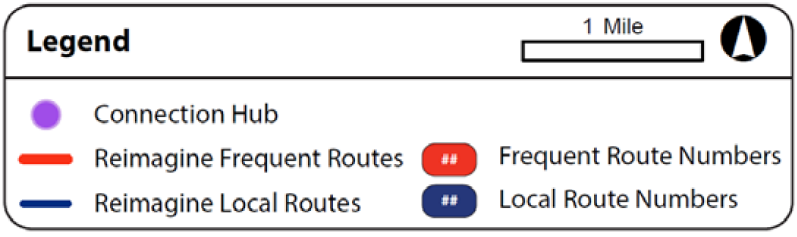
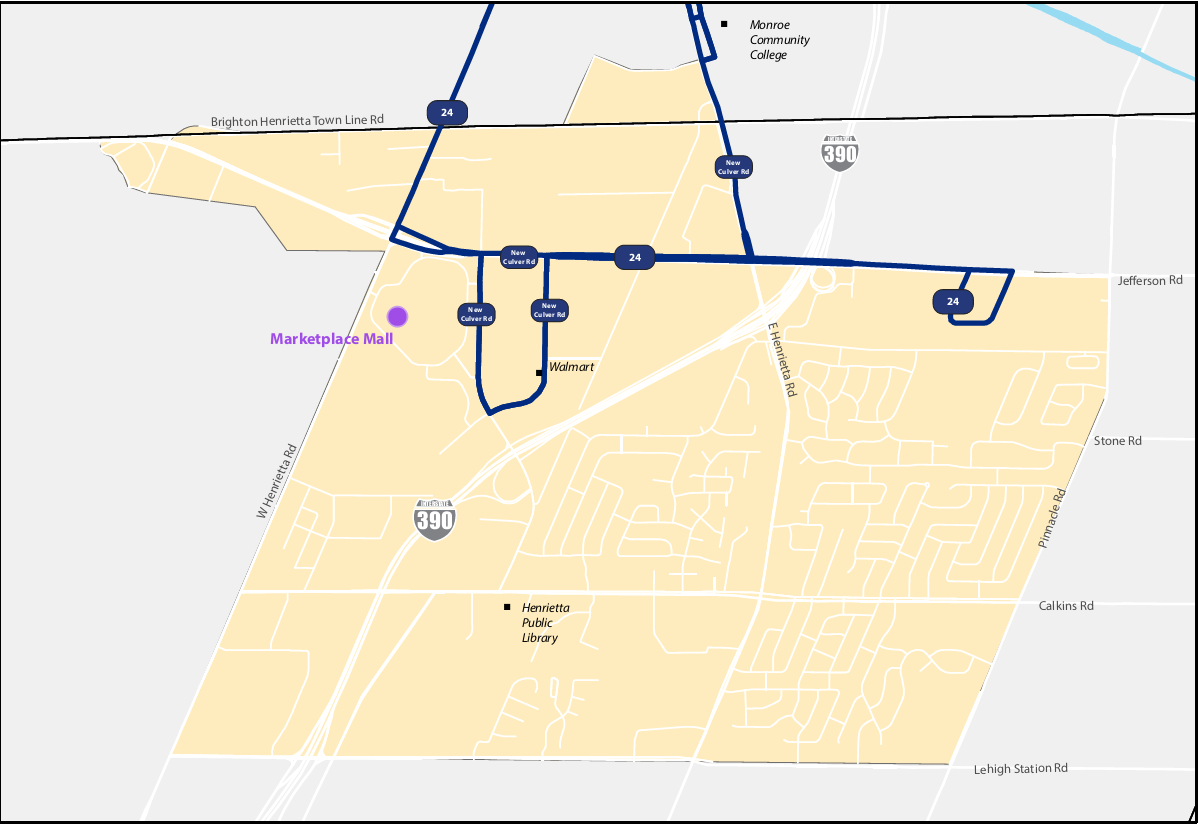


Henrietta Community Mobility Zone

The Henrietta CMZ will provide connections beyond the fixed-route network to destinations within the Town of Henrietta. The Henrietta CMZ is a 19.57 square-mile area located south of the City of Rochester. The CMZ is bisected by the I-390 expressway, Jefferson Road (252) and West Henrietta Road (15) and is home to regional retail destinations, such as Marketplace Mall, Southtown Plaza, a Walmart Supercenter and Frontier Commons. The Henrietta CMZ area is defined as the Town of Henrietta north of Lehigh Station Road and includes core retail and commercial areas of Henrietta and residential and service destinations. Lehigh Station Road forms the south boundary, Jefferson Road and Henrietta-Brighton Town Line Road forming the north boundary, Pinnacle Road forms the east boundary, and West Henrietta Road forms the west boundary. A connection hub near Marketplace Mall allows customers to transfer to or from the Culver Crosstown or Marketplace local fixed route service and use RTS on-demand or PMOD within the CMZ.

The key destinations in the Henrietta CMZ include Marketplace Mall and Henrietta retail core, Jefferson Road corridor, the Henrietta Town Hall, the Henrietta Town Library, the Future Veterans Administration Outpatient Facility on Calkins Road, and dispersed senior, affordable or assisted housing and student housing locations throughout the CMZ.

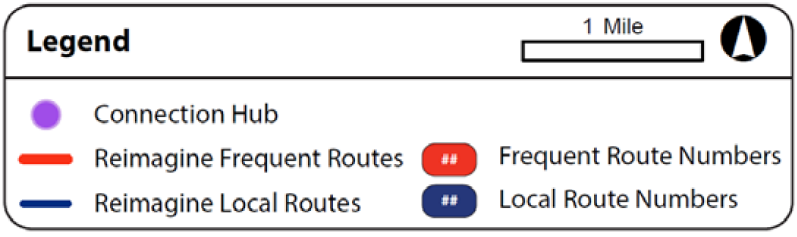
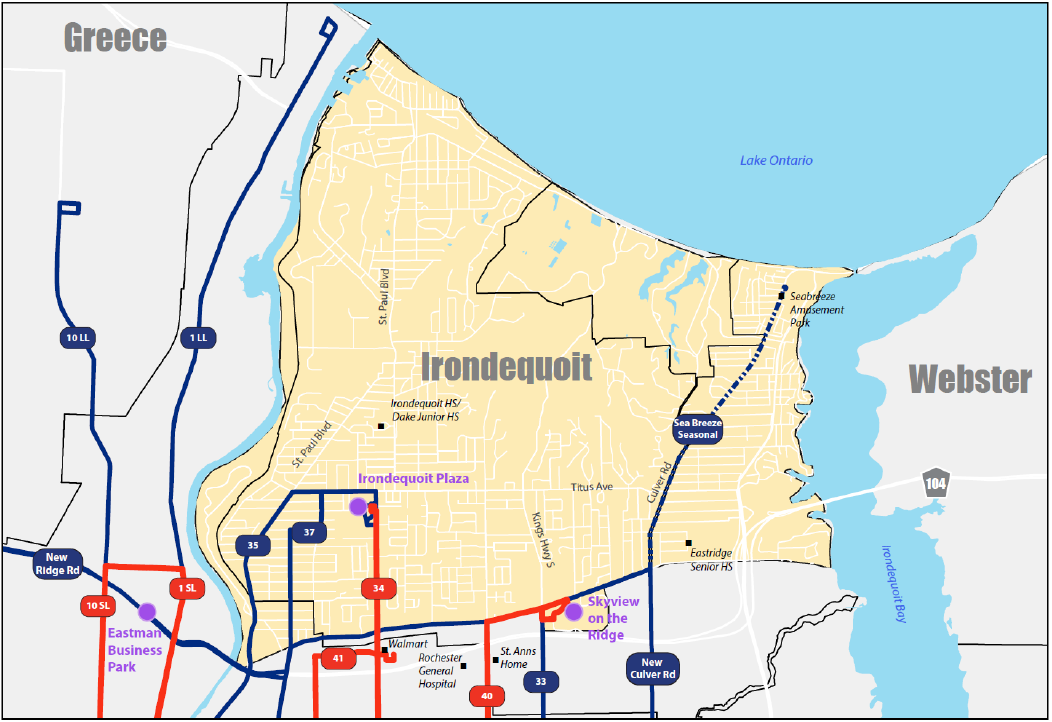
The Henrietta CMZ offers RTS on-demand service 6:00 AM to 7:00 PM Monday to Sunday and holidays. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight Monday to Sunday and holidays. The fixed route Culver Crosstown connects Irondequoit to Marketplace Mall by way of Skyview on the Ridge to Culver Road, Parsells Avenue, Goodman Street, MCC, and East Henrietta Road. The fixed route local service for Marketplace serves West Henrietta Road and Jefferson Road via Marketplace Mall.



Irondequoit Community Mobility Zone

The Irondequoit CMZ is outlined by the Genesee River and the Irondequoit town line on the west; by Lake Ontario to the north; Irondequoit Bay to east; and East Ridge Road, Seneca Avenue, and Long Acre Road to the south. The 12.12 square-mile area includes or is near several recreational and cultural opportunities, including Ontario Beach, Seneca Park Zoo, Durand Eastman County Park and Seabreeze Amusement Park. The southern portion of the CMZ includes connections to fixed route transit. There is a connection hub near Irondequoit Plaza and a connection hub near Skyview on the Ridge. The Culver Crosstown fixed route service travels into the CMZ and connects to a seasonal route traveling to Seabreeze Amusement Park.

The key destinations in the Irondequoit CMZ include the Skyview on the Ridge, Rochester Regional Health, Ridge/Titus retail corridors, Wegmans, Irondequoit Plaza, Pattonwood Drive, Irondequoit Bay Park, West Irondequoit High School, Dake Middle School, Seabreeze Amusement Park, and Lakeshore communities and attractions. The Irondequoit CMZ offers RTS on-demand service 6:00 AM to 7:00 PM Monday to Sunday and holidays. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight Monday to Sunday and holidays. Portions of the fixed route local service for St. Paul, North Clinton, and Hudson travel into the CMZ and go to the connection hub near Irondequoit Plaza. Portions of the fixed route frequent service for Portland and the local service for Goodman travel into the CMZ and go to the connection hub near Skyview on the Ridge. The Culver Crosstown and Ridge Road Crosstown also travel along the southern boundary of the Irondequoit CMZ. The Ridge Road Crosstown continues to travel along the southern boundary of the Greece CMZ and goes to the Eastman Business Park connection hub.



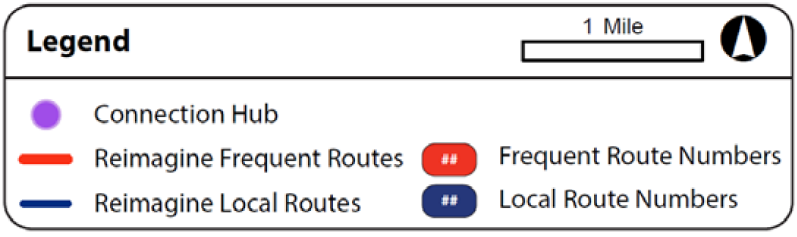
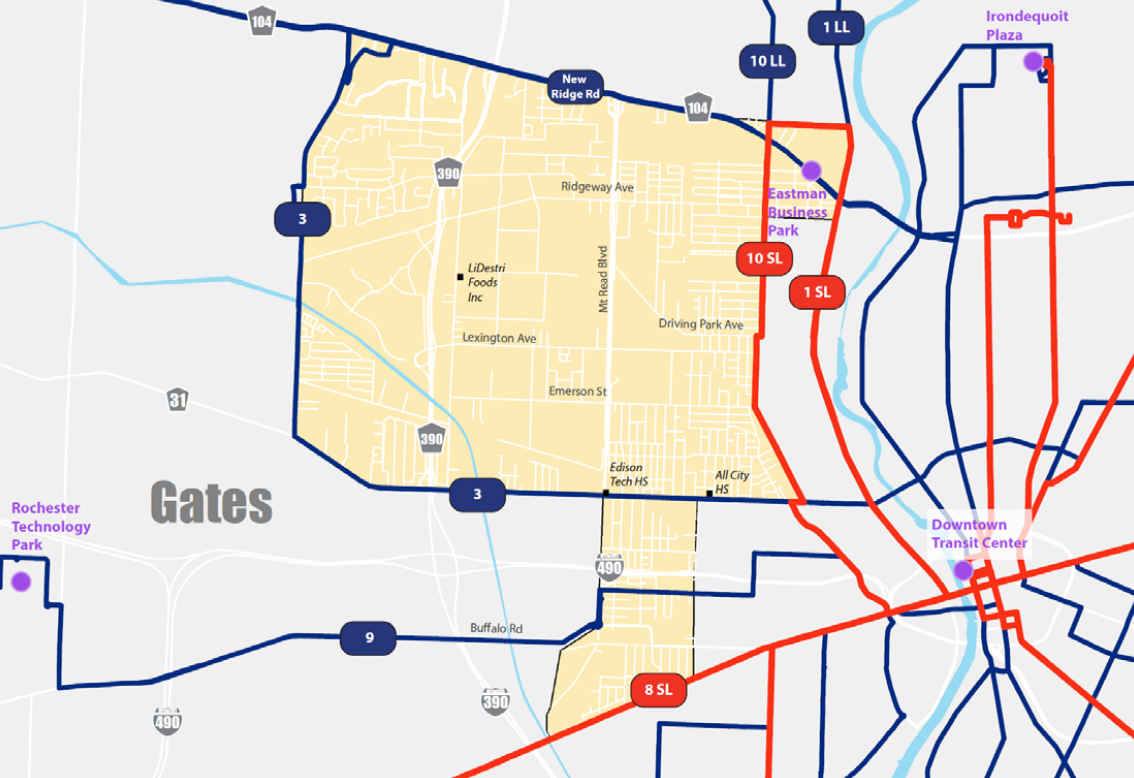
Lexington Community Mobility Zone

The Lexington CMZ represents a mostly industrial area within the City of Rochester. At 8.89 square miles, the Lexington CMZ is the smallest by area but major employers are located within the Zone, as well as community services such as FoodLink. The Lexington CMZ is the area within the following boundaries: Ridge Road to the north; Dewey Avenue to the east; Lyell Avenue to the south; and Long Pond Road to the west. The Zone partially overlaps with the Greece CMZ along Ridge Road West.

The zone also extends south beyond Lyell Avenue and into an area surrounded by Mt. Read Boulevard and Cairn Street to the west, Chili Avenue to the south, and Hague Street to the east. The Lexington CMZ contains one connection hub near the Eastman Business Park. Key destinations in the Lexington CMZ include the Lexington Avenue Industrial Corridor, Eastman Business Park, LiDestri Foods, Love Beets, Edison Career and Technology High School, community services such as FoodLink, and Greece Ridge Mall.

The Lexington CMZ offers RTS on-demand service 6:00 AM to 7:00 PM during weekdays only. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and 7:00 PM to midnight during weekdays only.

Access to fixed route service is possible along the north, south, east, and west edges of the zone.

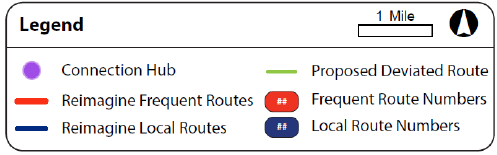
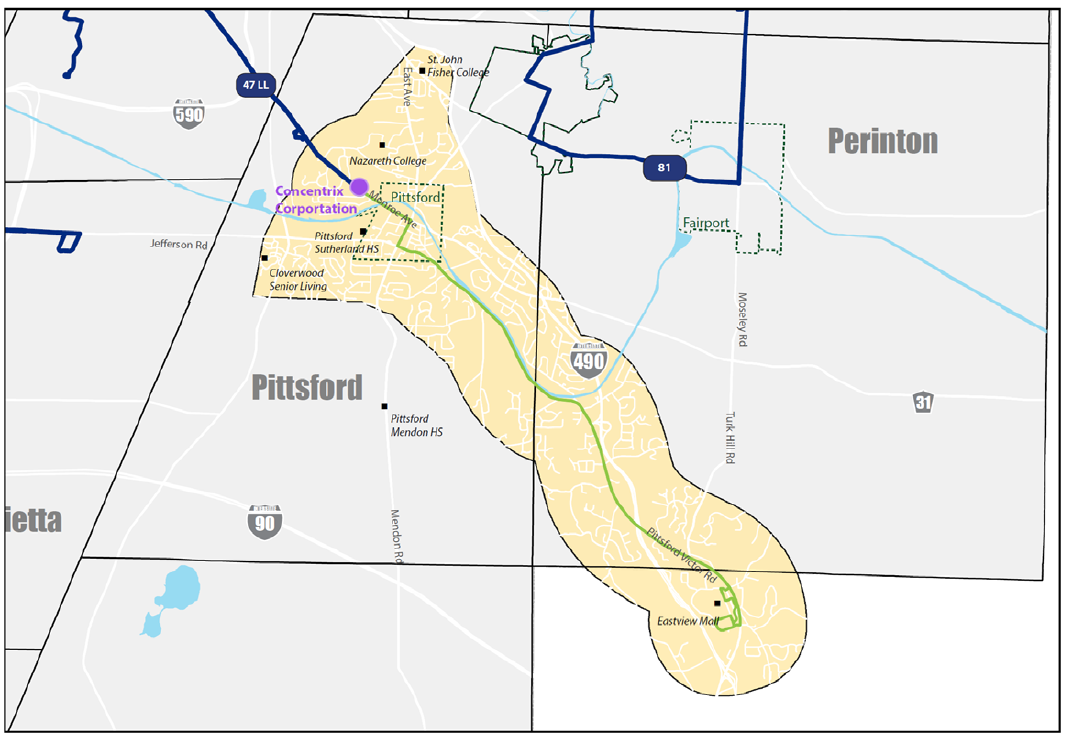


Pittsford and Eastview Community Mobility Zone

The Pittsford/Eastview CMZ contains the New York Route 96 corridor between Eastview Mall and the Town of Pittsford. The Eastview CMZ offers RTS flex service starting at a connection hub near Concentrix Corporation and travels between Pittsford Plaza in the Town of Pittsford to Eastview Mall in Victor, (Ontario County) along NYS Routes 31 and 96. The primary route travels along Monroe Avenue and Route 31 into the Village of Pittsford, where it continues southeast along Route 96 through Bushnell’s Basin to Eastview Mall. Route deviations are typically up to ¾ of a mile on either side of the main route, but expands to include the area near the intersection of Clover Street and Jefferson Road. This allows service to key destinations including St. John Fisher College and Cloverwood Senior Living.

Key destinations in the CMZ include Nazareth College, St. John Fisher College, the Village of Pittsford, Cloverwood Senior Living, Concentrix Plaza, Pittsford Plaza, Pittsford Sutherland High School, Pittsford Mendon High School, Southeast Family Branch YMCA at Clover and Jefferson, Eastview Mall retail corridor, and Eastview Mall park and ride. The hours of service for RTS flex are 6:00 AM to 7:00 PM Monday through Sunday. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and from 7:00 PM to midnight Monday to Sunday.

The fixed route local long line service for Monroe Avenue continues into the CMZ and goes to the connection hub near Concentrix Corporation.



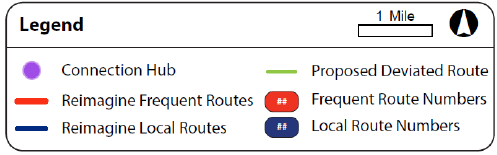
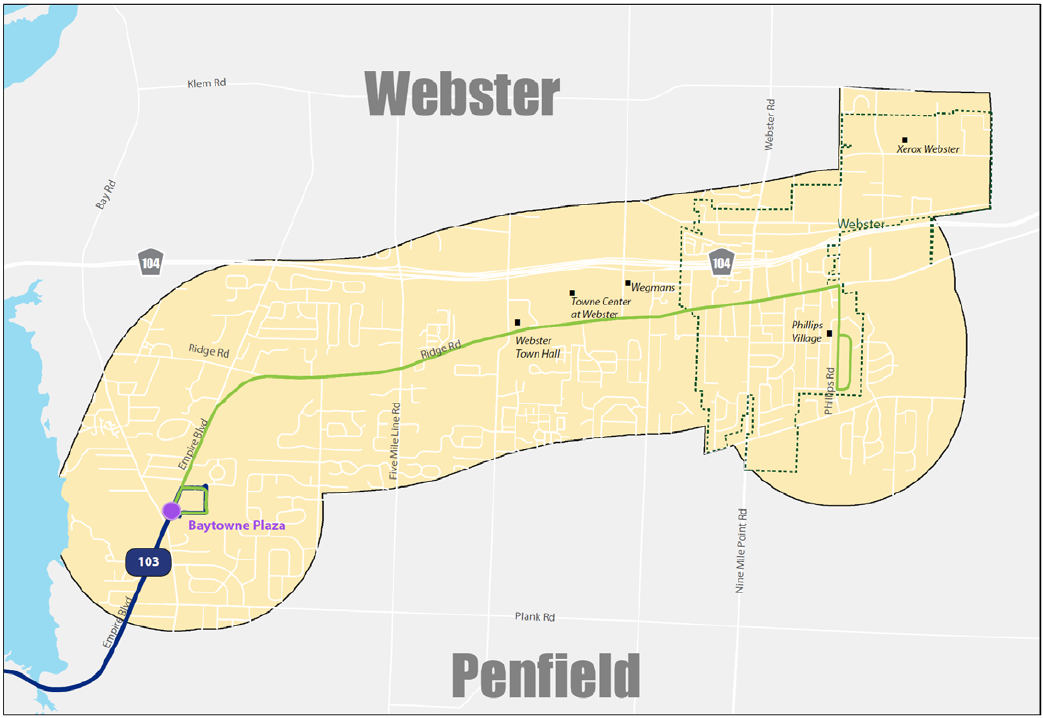
Webster Community Mobility Zone

The Webster Community Mobility Zone provides connections to the fixed-route system through a connection hub at BayTowne Plaza in Penfield. The 10.8 square-mile Zone has important retail and commercial corridors along Ridge Road, in the village center and is home to a Xerox facility. The Webster CMZ offers RTS flex service for the area that runs between BayTowne Plaza in the Town of Penfield and Phillips Village (Phillips Road) in the Village of Webster along Empire Boulevard and Ridge Road. Route deviations are permitted within ¾ of a mile on either side of the main route, plus within the Village of Webster. This includes a northerly extension that encompasses the Xerox Webster site. The connection hub is located near BayTowne Plaza.

Key destinations in the CMZ include Ridge Road retail and service corridor, BayTowne Shopping Center, the Town Center at Webster, the Webster Town Hall, Phillips Village, Hill Haven on Empire Boulevard, Basket Road, the Village of Webster, apartment complexes on Hold Road and Hard Road, and the Xerox Webster campus.

The hours of service for RTS flex are 6:00 AM to 7:00 PM Monday through Sunday. PMOD service is available in the same corridors and boundaries from 5:00 AM to 6:00 AM and from 7:00 PM to midnight Monday to Sunday.

The fixed route local service for Webster continues into the CMZ and goes to the connection hub near BayTowne Plaza.



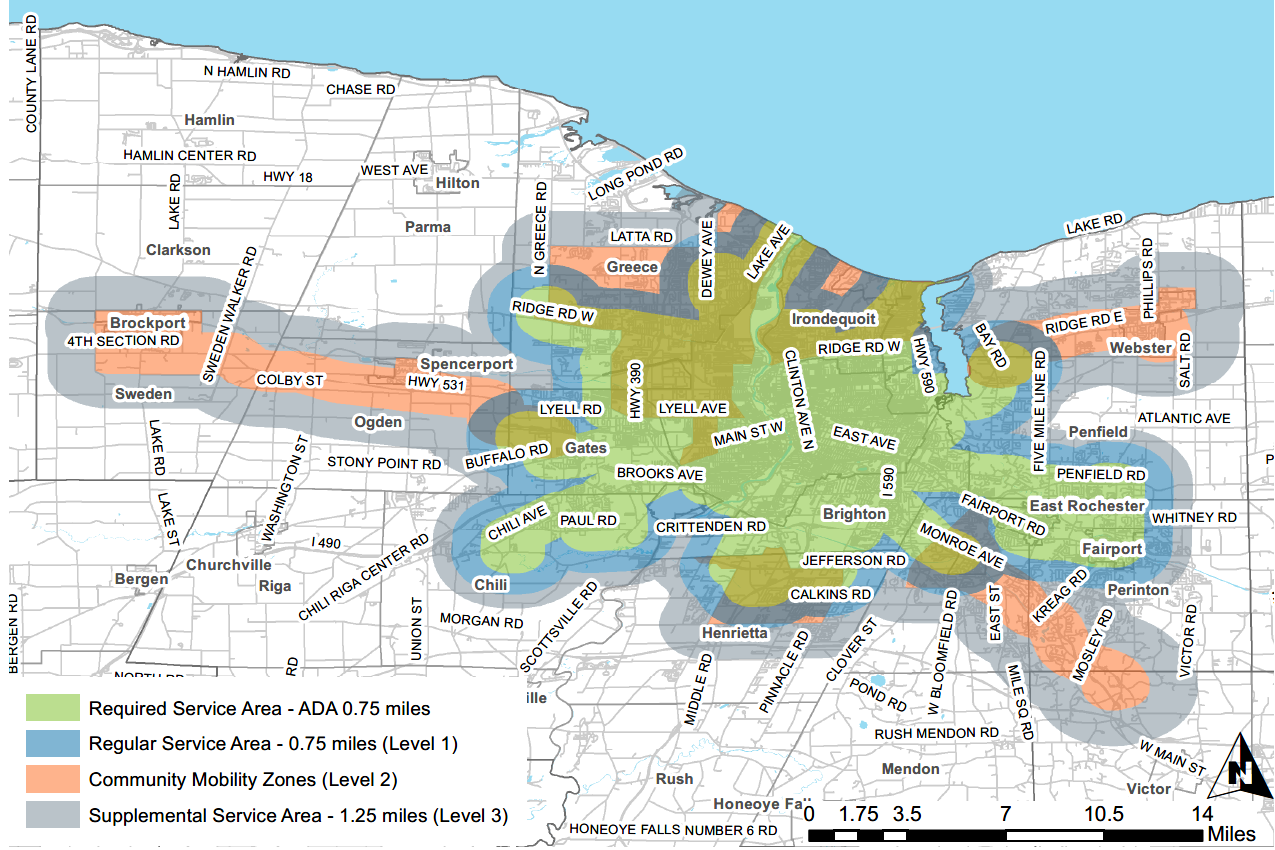
End of Exhibit 2.

Exhibit 3: Reimagine RTS Access Paratransit Service Area

Weekday Service Area

Weekday paratransit service includes four areas, each with unique characteristics. The areas are categorized as the Required Area and three supplemental service levels (Level 1, Level 2, and Level 3).

We suggest using the following interactive online map at <https://arcg.is/0unvvv> along with other resources available to you such as assistive technologies or friends, family, and attendants, in order to better understand where points of interest or specific addresses are in the proposed areas.



The Required Area surrounds the fixed route service and is shown on the map as a large green “blob” shape. This is the area where the Authority is obligated by law to provide complementary paratransit service. The Required Area is a corridor with a width of ¾ of a mile on each side of each fixed route. At the end of a route, there is a semicircular “cap” on the corridor, consisting of a ¾- mile radius from the endpoint of the route to the parallel sides of the corridor. RTS Access will provide paratransit service to any origin or destination point within a corridor fitting this description around any fixed route in the RTS system. The weekday service hours for the Required Area are Monday through Friday from 5:00 AM to midnight.

For Level 1, Level 2, and Level 3, RTS Access provides supplemental services with varying characteristics. One way to imagine these levels is to think of a pat of butter melting in a pan on a stovetop. The Required area is the center of the pan on the burner, and as the butter melts, it covers more and more of the pan’s surface, spreading to the edges. If the pan represents Rochester, the center is the urban core and the farthest edges of the pan are areas surrounding the suburbs of Brockport, Greece, Irondequoit, Henrietta, and Pittsford.

Level 1 is shown on the map as a thick blue outline surrounding the green blob. The supplemental service in Level 1 goes ¾ miles beyond the ¾-mile Required Area, for a total service area of 1 and ½ miles. RTS Access will make its best effort to deliver the same service criteria for Level 1 as it does in the Required Area; rather than treating this area as supplemental, RTS Access will service it as though it is in the required area and will refer to this as a regular service area. This includes allowing customers to negotiate pickup times and reserve rides up to five days ahead, and guaranteeing a ride with a one-day advance reservation. The weekday service hours for Level 1 are Monday through Friday from 5:00 AM to midnight.

For customers traveling to the Transit Center in order to use fixed route for some trips, RTS Access will perform drop-offs and pickups at Clinton Avenue, at the Transit Center plaza.

Level 2 consists of portions of the Community Mobility Zones that are not covered by the Required Area or Level 1. The map shows each Community Mobility Zone as an orange shape that corresponds to the geographic boundaries of the zone. Portions of each shape are obscured because the Required Area or Level 1 overlaps it. The Level 2 areas are the remaining visible orange portions without any overlap. The Required Area and Level 1 overlap significantly with the Greece, Henrietta, and Irondequoit CMZs. RTS Access will make its best effort to deliver the same service criteria for Level 2 as it does in the Required Area. This includes allowing customers to negotiate pickup times and reserve rides up to five days ahead, and guaranteeing a ride with a one-day advance reservation. The weekday service hours for Level 2 are Monday through Friday from 5:00 AM to 7:00 PM, excluding holidays. There is no charge if paratransit customers present their RTS Access ID and ride RTS on-demand or RTS flex from a location in Level 2 to a location in Level 1 or the Required Area, where the customer has scheduled a pickup by RTS Access.

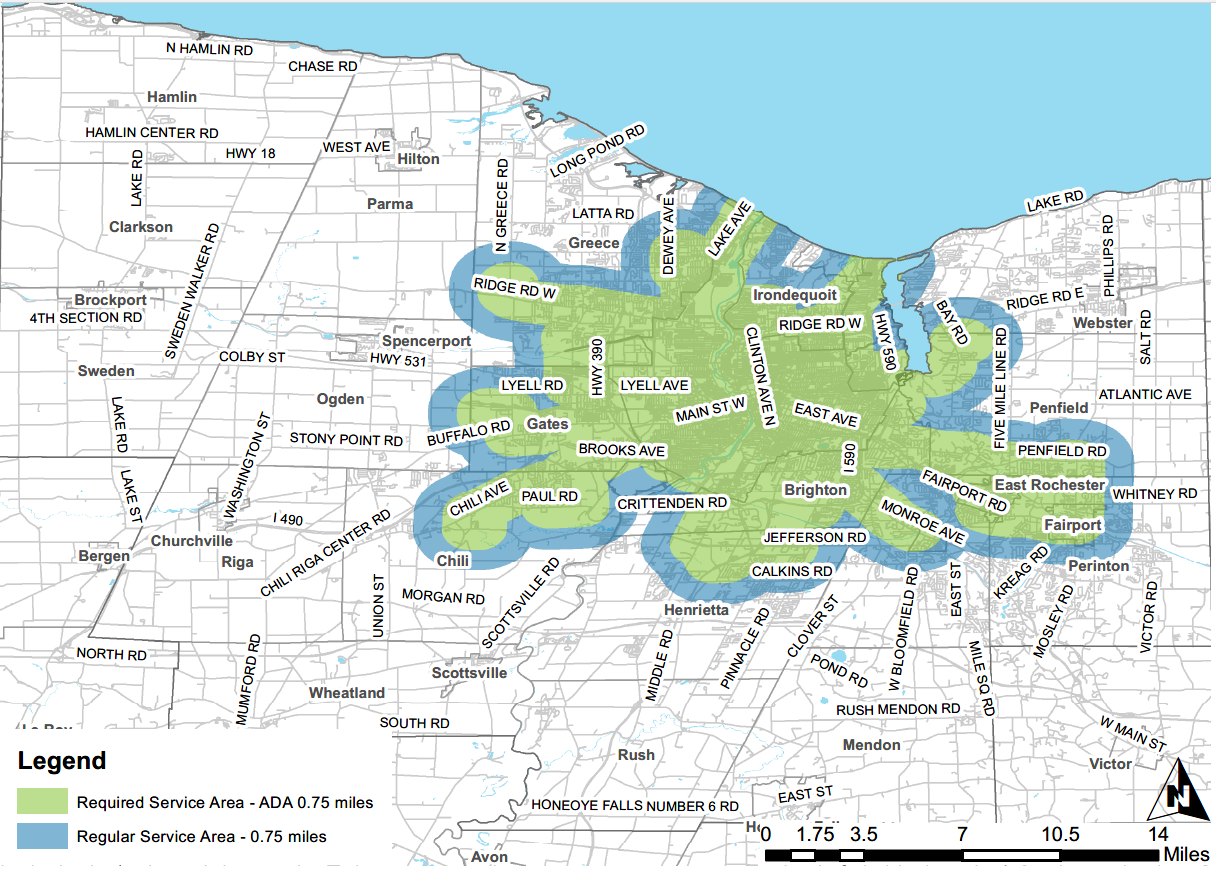
Level 3 supplemental service will be in a set geographic area which is 1.25 miles around the Required Area and/or Level 2 at the time of R G R T A Board approval of the Paratransit Plan for 2020. Note, however, that the Level 3 geographic area will not be subject to change, either smaller or larger, in the event of potential subsequent changes in the Required Area and/or Level 2. It is shown on the map as a thick grey outline around Levels 1 and 2. The supplemental service will be provided only if space is available after accommodating requests for service within the Required Area, Level 1, and Level 2. RTS Access will expect customers to accept the possibility of unavailable space when attempting to reserve a trip to an origin or destination in Level 3, and pay the supplemental rate upon boarding the bus. Reservations can be made up to 1 day in advance only and trips are not guaranteed. The weekday service hours for Level 3 are Monday through Friday from 5:00 AM to 7:00 PM, excluding holidays.

RTS Access customers with subscriptions can take subscription trips in the Required Area, Level 1, and Level 2.

People must not assume they live in the paratransit service area based on the maps. RTS Access recommends asking the appropriate representatives whether a trip is in the paratransit service area. Do not consult anyone outside the appropriate representatives at RTS Access for this determination. Dial 585-224-8330 Option 3 to ask about the service area or about pickup times available for a specific origin/destination.

Weekend Service Area

Weekend paratransit service includes the Required Area and Level 1.



The Required Area surrounds the fixed route service and is shown on the map as a large green “blob” shape. This is the area where the Authority is obligated by law to provide complementary paratransit service. . RTS Access will provide paratransit service to any origin or destination point within a corridor fitting this description around any fixed route in the RTS system. The weekend service hours for the Required Area are Saturday and Sunday from 6:00 AM to midnight and include holidays.

Level 1 is shown on the map as a thick blue outline surrounding the green blob. The supplemental service in Level 1 goes ¾ miles beyond the ¾-mile Required Area, for a total service area of 1 and ½ miles. RTS Access will make its best effort to deliver the same service criteria for Level 1 as it does in the Required Area; rather than treating this area as supplemental, RTS Access will service it as though it is in the required area and will refer to this as a regular service area. This includes allowing customers to negotiate pickup times and reserve rides up to five days ahead, and guaranteeing a ride with a one-day advance reservation. The weekend service hours for Level 1 are Saturday and Sunday from 6:00 AM to midnight and include holidays.

RTS Access customers with subscriptions can take subscription trips in the Required Area and Level 1.

For customers traveling to the Transit Center in order to use fixed route for some trips, RTS Access will perform drop-offs and pickups at Clinton Avenue, at the Transit Center plaza.

People must not assume they live in the paratransit service area based on the maps. RTS Access recommends asking the appropriate representatives whether a trip is in the paratransit service area. Do not consult anyone outside the appropriate representatives at RTS Access for this determination. Dial 585-224-8330 Option 3 to ask about the service area or about pickup times available for a specific origin/destination.

End of Exhibit 3

Exhibit 4: Paratransit Trip Subscriptions Policy

1.0. Policy

“Subscriptions” will allow customers to set a schedule of repeated trips. RTS Access will offer Subscriptions to customers who meet the conditions described in this policy. The cost of a Subscription trip is identical to the fare for an individually scheduled trip. It is important for you to meet our conditions and use the Subscription trips responsibly. If you engage in disqualifying conduct, we will revoke your trip Subscription. We expect all customers to follow these rules for Subscriptions:

1. Regularly use your allotted Subscription trips.
2. Cancel Subscription trips at least six days before the next scheduled trip.
3. Notify us if you miss a trip due to unforeseen situations or operational error.
4. Keep your eligibility certification current (recertify or renew by the due dates).
5. Request a hold six days before your next Subscription trip if you will be on vacation, recess, or holiday, and do not require the trip for one or more days.

We expect you to notify us if you will no longer need the Subscription. We expect you to follow the rules in the most current version of our Paratransit Service Infractions and Suspensions policy.

2.0. Qualifying for a Subscription

2.1. Eligibility Certification

To qualify for a Subscription, you must have All-Trip or Conditional certification. The certification must be current.

2.2. Frequent Identical Travel

To qualify for a Subscription, you must take one or more identical trips per week. Identical trips have the same origin and destination and the same pick-up or drop-off time on the same day or days of the week. We will consider trip purpose. Appropriate trips for a Subscription might include going to work, medical treatments such as dialysis, or a day treatment or rehabilitation program. The trips must occur on a regular ongoing basis. If you volunteer or work for an organization three times per week but your schedule changes monthly, a Subscription is not appropriate due to the variability in your schedule.

2.3. Short-Term Subscriptions

We will offer short-term subscription service to customers who will have frequent, identical travel for a specific need such as medical appointments or work programs. Short-term subscriptions are for periods between three weeks and no greater than 90 days. You cannot change short-term subscriptions or place a short-term subscription on hold. The same rules used in regular Subscriptions will apply to short-term Subscriptions with regard to waiting lists, capacity, availability, and peak demand. You must provide us with the start and end dates of the short-term Subscription.

3.0. Unforeseen Circumstances

Unexpected situations may cause you to miss a Subscription trip unintentionally or force you to cancel at the last minute. We will excuse situations when you miss or cancel a trip due to a reason outside your control. This includes sudden illness, a personal, household, or medical emergency, or needing to care for a sick family member. Before your pick up window begins, call 585-654-0675 and let us know about the situation. If an urgent situation prevents you from calling before your pickup, please notify us at a suitable time. We will also excuse situations when a scheduling or operations error causes you to miss your trip. Call 585-654-0647 so we are aware of the problem and do not assign a Service Infraction.

4.0. Temporary Holds (Vacation, Recess, Employer Holiday)

You can put your Subscriptions on hold for up to three months. When a Subscription is on hold, you can stop using the Subscription temporarily without penalty. Vacations are an appropriate situation for putting a Subscription on hold. Another example is a school recess or an employer-sponsored holiday. Call 585-654-0647 to request your hold six days in advance of the date for your vacation, recess, or holiday. You will need to tell us the start date for the hold and you will need to call us within three months to resume your Subscription trips as usual. If you do not resume Subscription use after three months, your Subscription will be revoked.

5.0. Offering Subscriptions

You may call 585-654-0647 and request a Subscription at any time during normal business hours. If capacity is sufficient, we will offer the Subscription at that time. If capacity is insufficient, we will add you to the waiting list. When RTS Access has capacity to offer a Subscription, the Subscription Coordinator will select the next customer from the waiting list.

When we offer a Subscription, the Subscription Coordinator will issue a message in an accessible format to notify the customer. The message will outline the required conditions, restrictions, and actions that will result in losing the Subscription. New Subscriptions that can be offered will begin 21 days after the date of the request. You must call us at 585-654-0647 to confirm that you still need the Subscription. If we do not hear from you within 21 days of the date of the message, we will move your name to the end of the waiting list.

From time to time, RTS Access may use the travel data from the paratransit scheduling system (Trapeze PASS), and the Customer Relationship Management system (Salesforce) to identify customers who meet the conditions for Subscription service, as long as capacity exists and there is no waiting list. We will notify customers who meet the conditions for Subscription service in an accessible format.

6.0. Revoking Subscriptions

We will revoke your Subscription service if you fail to maintain the required conditions, which are: identical and frequent travel, reliable ridership, and current eligibility certification.

You will receive a message in an accessible format that we are revoking your Subscription service. The message will include the date that the Subscription will terminate. After we notify you, you must call to schedule all trips. If you do not renew the information for an All-Trip eligibility certification, your paratransit trips will be suspended until the updated information is provided, including subscription trips.

6.1. Failure to Maintain Identical and Frequent Travel

When you accept an offer of a Subscription and complete the reservation process, the Subscription trips will have an agreed upon time, location, day of the week, and frequency. If you use the Subscription service and your schedule changes, you will need to reapply. Call RTS Access at 585-654-0647 to apply for Subscription service. If Subscription service cannot be immediately re-arranged, you can be added to a waiting list. You may still call RTS Access during regular business hours and schedule your desired trips individually.

If you had a temporary hold applied to your Subscription, but failed to resume using it after your hold period ended, we will revoke the Subscription.

6.2. Failure to Maintain Reliable Ridership

We expect customers to use their Subscription trips responsibly. If we identify a pattern of absenteeism or excessive cancellation, we will revoke your Subscription. In some situations, a Subscription is not a good fit for your work or program schedule.

##### A. Repeated Service Infractions

The first time you receive a Repeated Service Infraction, you will lose your Subscription. We will revoke your Subscription and tell you the date to begin scheduling every trip.

If you are suspended, the suspension will apply to all trips, including Subscription trips. Repeated Service Infractions, exclusions, and penalties are explained in the “Paratransit Service Infractions and Suspensions” policy.

##### B. Excessive Cancellation of Subscription Trips

RTS Access may revoke any Subscription that is canceled 30% or more in two consecutive months. A customer cannot miss more than seven Subscription trips in one month. Seven or more missed trips in one month will be considered a consistent pattern of cancellations of any part of a Subscription. The decision to revoke a Subscription because of excessive cancellations is final. We will exclude all subscriptions canceled six days in advance of travel. If you are suspended, the suspension will apply to all paratransit trips, including Subscription trips.

6.3. Failure to Maintain Eligibility Certification

If you have a Conditional eligibility certification, you must keep it current. If you have a trip Subscription but allow the Conditional eligibility certification to expire, we will revoke the trip Subscription privilege on the date of expiration. If you get an extension, you still have the ability to use paratransit service.

The RTS Access A D A Coordinator will issue a message in an accessible format to you 90 days before your Conditional eligibility certification expires. The message will remind you to recertify to maintain the eligibility condition for paratransit and for Subscription service. If you have not recertified within 60 days of the expiration date, you will receive a reminder notification. If the certification expires, RTS Access will notify you that you cannot use paratransit service until you re-establish eligibility. Your Subscription will be revoked.

Contact the A D A Certification Coordinator before your eligibility expires to request an extension of time to obtain approval of your Conditional eligibility certification. If approved, the extension will apply to all Subscriptions.

6.4. Requesting Reinstatement of a Revoked Subscription

If we revoke your Subscription service, you may request to reinstate that service or apply for a new Subscription 60 days after the date the Subscription was revoked. You must not have any Service Infractions during that period. If you qualify and capacity is available, we will reinstate the Subscription or create a new Subscription. If the Subscription requests exceed capacity, availability, or peak demand, we will add you to a waiting list.

If your Subscription service has been revoked due to Repeated Service Infractions three times within 18 months, you will no longer qualify for Subscription service.

7.0. Restrictions

Paratransit is a shared ride service and must reasonably satisfy non-subscription demand. Operational costs, performance standards, customer demand, scheduling logistics, and physical capacity all affect the distribution of service. The following restrictions will apply to Subscriptions to balance service distribution.

1. Subscription service will not exceed more than 50% of the number of trips available at a given time of day, unless there is non-subscription capacity.
2. Subscription trips will not run on major holidays.
3. Subscriptions will not be available for unique trips, or during hours or days with peak demand.
4. Subscriptions will not be available to customers with Temporary eligibility certifications.
5. Subscriptions will not be available for supplemental service in Level 3 of the paratransit service area.

7.1. Capacity, Availability, and Peak Demand

RTS Access will make the maximum percentage of Subscription trips available to qualifying customers according to the non-subscription capacity for trips during a particular day and time. For example, if we have the capacity to provide 50 complementary paratransit trips between 8:00 AM and 9:00 AM on Mondays, then the maximum number of trips available for Subscription trips is 25 trips (or 50%). If our capacity for paratransit trips during that period increases, the percentage of Subscription trips will also increase.

We will add customers who qualify for a Subscription to a waiting list if their trip occurs on particular days or times when RTS Access experiences capacity constraints and cannot absorb additional riders. When our capacity allows an increase in Subscription riders during a particular day and time, RTS Access will contact the appropriate number of customers on the waiting list and schedule the Subscription trip. Customers on a waiting list can expect to wait 6 to 9 months for the necessary capacity to become available.

Availability of Subscriptions will not affect general paratransit service or the eligibility determination process. We will reduce or exclude Subscriptions from days or times with high non-subscription ridership demand. Demand may fluctuate seasonally. Subscription service availability during peak work times may be limited and/or priority given to customers who use the Subscription service for work trips.

7.2. Major Holidays

RTS Access does not provide Subscription service on these major holidays: New Year’s Day, Memorial Day, July 4th, Labor Day, Thanksgiving Day, and Christmas Day. RTS Access does not provide Subscription service on any day that RTS determines is a holiday (i.e. floating holiday).

7.3. Unique Trips

Subscription service will only apply to identical trips that repeat on a regular basis. For example, routine travel to the same facility for a standing appointment on Tuesdays and Thursdays each week will qualify for a Subscription. Unique trips vary from week to week or month to month (a different destination, a different pick-up, different times, or different days of the week). Unique trips will not be included in a Subscription. Subscription and non-subscription customers must call and reserve each unique trip.

7.4. Eligibility Certification

We do not issue Subscriptions to customers with Temporary or expired Conditional eligibility certifications. Subscription service will be available only to customers with up-to-date All-Trip or current Conditional paratransit eligibility certifications. If your certification expires, we will revoke your Subscription. If you do not keep your information current (All-Trip renewal), we may suspend paratransit service, including Subscription trips, temporarily until you provide the information.

8.0. Rights Reserved

RTS Access will reserve the right to cancel a specific Subscription trip or terminate the entire Subscription if we experience capacity constraints. In that case, we will 1) inform you in advance of a scheduled trip that we are cancelling the trip or revoking the Subscription; and 2) instruct you to schedule trips separately. Along with restrictions, RTS Access will reserve the right to discontinue Subscription service if we cannot provide it while maintaining efficiency in our runs and service. If necessary, we may place Subscription service on hold temporarily for a period of up to 3 months. To preserve operational feasibility, we may modify the Subscription trip. We will contact the affected customers to negotiate pickup windows.

End of Exhibit 4

End of Exhibits for Section 1

# Section 2: Plan to Provide Comparable Paratransit

This section estimates the demand for comparable paratransit service in Monroe County, describes planned modifications to operational practices, and compares RTS Access service as it relates to the service criteria for complementary paratransit. RTS Access extends the comparison criteria to include the process for considering reasonable modification requests, allowing service animals, and complaint procedures. The section closes with a time-line and the 2017-2023 budget for comparable paratransit service.

## 2.1. Estimate of Demand

This subsection estimates the demand for comparable paratransit service as required in Subpart F, §37.139 (d) (1) of the federal regulations.

RTS Access tracks each ride for reporting purposes. RTS Access anticipates a stable trend for paratransit demand and predicts that demand will increase at a rate of about 3% each year.

R G R T A and RTS Access will rely on the Demographic Profiles and Major Destinations information for Monroe County provided through the Coordinated Public Transit-Human Services Transportation Plans developed by the Genesee Transportation Council.

## 2.2. Analysis of Existing Service and Proposed Modifications to Operational Practices

R G R T A determines that the current RTS Access service complies with the service criteria for complementary paratransit set forth in Subpart F, §37.131 of the federal regulations. Proposed modifications include changes to the service area, to Subscription service, to Service Suspensions, to Eligibility categories, to the period for Advance Reservations, and to the base trip fare.

### 2.2.A. Origin-to-Destination Next-Day Service

The basic operating mode for RTS Access is curb-to-curb. If a customer needs help beyond the curb to reach a destination beyond the curb, the customer can request assistance beyond the curb in advance of or during the ride. RTS Access will refer to the practice of providing assistance beyond the curb as a reasonable modification and will discontinue using the term “enhanced service.” RTS Access will treat requests for “door-to-door” assistance or “enhanced service” as reasonable modification requests. More details are in Subsection 2.5.A and 2.5.C of this Plan.

### 2.2.B. Service Area

The paratransit service area will change according to the redesigned RTS fixed route system going into effect in the Summer of 2020. The service area where R G R T A is obligated by law to provide complementary paratransit is a corridor with a width of ¾ of a mile on each side of each fixed route. At the end of a fixed route, there is a semicircular “cap” on the corridor, consisting of a ¾- mile radius from the endpoint of the route to the parallel sides of the corridor. These areas are all considered the Required Area for RTS Access paratransit service.

RTS Access will provide supplemental paratransit service in geographic areas extending outward from the Required Area. In 2020, there will be three levels of paratransit service, each covering a specific geographic area. Refer to 1.3.D. Supplemental Service for details.

The redesigned RTS system includes Community Mobility Zones, where fixed route service connects to demand responsive services. Exhibit 2 provides details about demand responsive service in the community mobility zones, and Exhibit 3 provides details about the paratransit service area, including the Required Area for complementary paratransit and the three levels where supplemental services are provided.

### 2.2.C. Subscription Service

The FTA rules allow transit agencies to 1) provide Subscription service at their discretion, and 2) use waiting lists, capacity constraints, trip purpose restrictions, or priorities for participation in the Subscription service. Unless there is also capacity for regular paratransit trips, the FTA limits Subscription trips to no more than 50% of the number of trip available at a given time of day. RTS Access will make the maximum percentage of Subscription trips available based on capacity.

RTS Access will provide the Paratransit Trip Subscriptions policy in an accessible format. RTS Access will offer Subscriptions to customers who meet the conditions described in the policy. The policy explains the criteria for getting a Subscription, for using a Subscription, and for revoking a Subscription. The policy outlines restrictions and expectations.

The policy offers a new set of criteria to qualify for a Subscription. The frequent identical travel criterion considers the purpose of the trip along with the consistency and regularity of the trip. Customers do not have to establish a record of identical trips prior to being offered a subscription. We will also offer Short-term subscription service to customers if there is capacity. The Short-term subscription can be for a period of 21 days up to 90 days and applies to a specific need, such as a work program or specific medical treatment. We will add customers who qualify for a Subscription to a waiting list if their trip occurs on particular days or times when RTS Access experiences capacity constraints and cannot absorb additional riders. When our capacity allows an increase in Subscription riders during a particular day and time, RTS Access will contact the appropriate number of customers on the waiting list and schedule the Subscription trip. Subscription service will be available in the following paratransit service areas: the Required Area, Level 1, and Level 2. RTS Access will excuse situations when customers miss or cancel a trip due to a reason outside their control. However, customers are responsible for notifying RTS Access about these situations. The policy explains the process for applying temporary holds to Subscriptions during vacation, school recesses, or employer-sponsored holidays. The policy explains what actions will cause the revocation of a Subscription and the options for reinstating a Subscription. We will revoke a Subscription the first time you receive a Repeated Service Infraction. Sixty days after the date of the revocation, you can request to reinstate the Subscription or apply for a new Subscription. The policy explains what RTS Access considers a pattern of excessive cancellations and the consequences for Subscriptions.

The full Paratransit Trip Subscriptions policy is in Exhibit 4 of the Plan.

### 2.2.D. Service Infractions and Suspensions

RTS Access will use a calculation method recommended by FTA guidance to determine whether a pattern of missing scheduled trips exists and indicates an abuse or misuse of paratransit service. In such circumstances, it is appropriate for RTS Access to apply a penalty where the customer cannot use paratransit service for a temporary period (service suspension).

RTS Access will provide the Paratransit Service Infractions and Suspensions policy in an accessible format. The policy will use simple language to help customers understand the rules, to help customers avoid service suspensions, and to help employees apply the process consistently.

RTS Access will track Service Infractions. Service Infractions include all of the following situations: 1) not showing up for the ride (No-Show), 2) cancelling less than two hours before the Pickup Period (Late Cancellation), and 3) refusing the ride when the bus arrives for your pickup (Cancel at Pickup). The system-wide data supports a 5% threshold for calculating Service Infractions and the approach complies with the guidance from the FTA. RTS Access will excuse situations when customers miss or cancel a trip due to a reason outside their control. However, customers are responsible for notifying RTS Access about these situations before the 15th of the following month. The policy gives instructions for notifying RTS Access when such a situation occurs, as well as for when customers believe they received a Service Infraction due to operational or scheduling error. On the 15th of each month, RTS Access will evaluate the customer’s actual usage of his or her reserved trips during the prior month. RTS Access will exclude the following: 1) excused missed trips; and 2) individual trips canceled two or more hours in advance of the scheduled pick up window; 3) Subscription trips canceled six or more days in advance of the trip date; and 4) Subscription trips that are put on hold six or more days in advance of the trip date. After these exclusions, if the RTS Access records indicate that 5% or more of the trips resulted in Service Infractions, RTS Access will apply penalties as defined in the policy. The accumulation of Repeated Service Infractions serves as the basis for a Service Suspension. RTS Access will add the number of times a customer has a Repeated Service Infraction in one calendar year to determine the penalty. The calendar year starts on January 1 and ends on December 31. The first Repeated Service Infraction in one calendar year will result in a penalty of a Warning Letter. The subsequent Repeated Service Infractions in one calendar year will result in service suspensions of increasing length, starting with five days but not exceeding 20 days. Repeated Service Infractions that occur in the last two months of the calendar year could result in a service suspension in the next calendar year, even though the tracking mechanism restarts for each calendar year. Any Repeated Service Infraction will also result in the revocation of any Subscription service a customer has. The customer can request reinstatement of the Subscription or apply for new Subscription service 60 days after the original revocation date. If Subscriptions are revoked three times during a period of 18 months, the customer will no longer qualify for Subscription service. RTS Access will provide any warnings, suspension notifications, or information about the appeals process in an accessible format. The full Paratransit Service Infractions and Suspensions policy is in Exhibit 6 of the Plan.

If a customer appeals a notice of service suspension, RTS Access will continue to provide paratransit service as usual to the customer while the appeal is pending. Important details about the appeal process are in the full Paratransit Appeal Process and Procedures available in Exhibit 11 of the Plan.

The A D A permits the suspension of customers from using complementary paratransit service if the customers engage in violent, seriously disruptive, or illegal conduct. Appeals for these types of suspensions follow a different process, which is explained in the Paratransit Appeal Process and Procedures in Exhibit 11 of the Plan. The full Paratransit Service Suspensions for Prohibited Conduct policy is in Exhibit 6 of the Plan.

### 2.2.E. Eligibility

RTS Access uses an application for eligibility certification and recertification. RTS Access will provide a PDF file of the application online at <https://www.myrts.com/RTS-Access/Apply>.

RTS Access will mail paper copies through USPS upon request. People can call 585-654-0618 to request an application.

Many sections of the application are multiple-choice questions to reduce the need for extensive writing or typing. The A D A Certification Coordinator is unable to perform eligibility determinations without all the information and all parts of the application. As a result, the application includes a mandatory checklist to assist people in completing the form correctly. RTS Access will return incomplete applications to the person for completion.

Applicants will be required to submit the entire application at the same time: all pages, all signatures, and all supporting materials. Applicants will be required to authorize medical or health care providers to release specific information to the A D A Certification Coordinator for the purpose of eligibility determination. The applicant will be required to obtain the information and signatures requested in Part 5 of the application.

The Paratransit Eligibility policy proposes the following certification types: All-Trip, Conditional, and Temporary. The term “All-Trip” will replace the term “Unconditional.” The All-Trip Certification grants the person eligibility to use paratransit service for all trips within the service area because the condition preventing the person from functionally using fixed route service is unlikely to improve and any other external improvements are unlikely to provide functional ability to use fixed route. All-Trip Certifications must be renewed every three years. The renewal consists of a basic form to obtain updated contact information and note any changes in travel abilities or needs. The renewal process also allows RTS Access to issue a new Tap &Go Access ID card if necessary. The renewal does not involve recertification.

Previously, the “Seasonal” eligibility certification applied to the period between October and April. However, this does not take into account seasonal conditions during other months of the year. As a result, “Seasonal” will not continue to exist as a separate eligibility category. Seasonal conditions are part of the wider set of conditions that can result in barriers to travel and result in a determination of Conditional eligibility.

Our Conditional eligibility category is revised to adhere more clearly to the Code of Federal Regulations set forth in Part 37 Transportation Services for Individuals with Disabilities (A D A). As Appendix D to § 37.123 explains, “A person may be A D A paratransit eligible for some trips but not others. Eligibility does not inhere in the individual or his or her disability, as such, but in meeting the functional criteria of inability to use the fixed route system established by the A D A. This inability is likely to change with different circumstances.” Conditional eligibility applies to individuals who are able to independently use fixed route transit service under some circumstances. Rather than basing Conditional eligibility on the degree to which a person’s specific disability could change, we are assessing a wide assortment of conditions, such as weather, season, and the physical characteristics of the location, to identify whether there are barriers that can affect travel. The policy further explains that a person’s functional ability to use fixed route service may increase or decrease based on specific, measurable conditions. The A D A Certification Coordinator will provide individuals with a description of the conditions under which he or she can use paratransit, as well as the basis for the eligibility determination.

When a person is certified or recertified as paratransit eligible, the A D A Certification Coordinator will send information about rights under Title VI along with the eligibility materials. RTS Access will provide recertification messages, renewals, eligibility determinations, and Title VI information in an appropriate accessible format. Applicants and customers can call 585-654-0608 during regular office hours for additional assistance.

Anyone who believes that his or her functional abilities have changed and the conditions established no longer reflect his or her abilities, can submit new documentation, or reapply at any time during the current term of eligibility.

The full Paratransit Eligibility Policy is available in Exhibit 11.

Applicants can elect to appeal a decision to deny eligibility or appeal the type of eligibility granted. Once the appeal process is complete, RTS Access will have 30 days to issue the decision. RTS Access will not provide paratransit service to the appellant while the appeal decision is pending. However, if RTS Access takes longer than 30 days to issue the appeal decision, it must provide paratransit service to the appellant until it issues the decision. Important details about the appeal process are in the full Paratransit Appeal Process and Procedures available in Exhibit 11 of the Plan.

### 2.2.F. Lack of Capacity Constraints

Customer feedback shows that on-time performance (OTP) is a strong indicator of service quality and correlates to customer satisfaction. RTS Access established an OTP goal of 95.0% in 2018. The goal may adjust on an annual basis, with the aim to provide an accurate measure of quality. RTS Access uses extensive technology, data points, and calculations to determine the on-time performance each month. Management monitors the results with the aim to identify causes for performance below the goal and ways to improve performance. However, customers can provide input about their direct experiences regarding the timeliness of service through the RTS Access Bus Service Questionnaire or the online Contact Us form available at <http://rts.force.com/RTSContactUs>. A sample of the questionnaire is available in Exhibit 8.

For 2019-20, RTS Access will replace 9 buses at a cost of $759,126.

RTS Access will mitigate early arrivals. It is the Bus Operator’s responsibility to wait until the pickup window starts before counting down the 5 minutes. Customers will have the ability to report the problem through several points of contact. RTS Access will provide instructions and the phone numbers online at <https://www.myrts.com/Access>.

1. Dispatch Office, 585-654-0675
2. Scheduling Office, 585-224-8330, Option 3
3. Cancellations/No-Shows, 585-654-0647
4. Operations, 585-654-0747

If we made the error, we will not count the missed ride as a Service Infraction. We will continue to train all Bus Operators on the correct procedure, and work with individual Bus Operators as necessary.

### 2.2.G. Pickup Periods for Return Trips and No Strand Policy

RTS Access will provide a policy to explain the practice of return service. The policy will explain the concept of the Final Pickup Period, which is the latest available pickup period that will allow RTS Access to finish transporting customers no later than the latest comparable fixed route drop-off. RTS Access will not provide return trips after the Final Pickup Period. If the customer either cancels or does not use the outgoing ride for a scheduled round-trip, RTS Access will provide the return ride as scheduled unless the customer cancels it. If a customer fails to appear for boarding within the scheduled Pickup Period for the return ride, RTS Access, at the request of the customer, will attempt to schedule a return trip so that the customer is not stranded. Exhibit 9 of the Plan provides the full Paratransit “No Strand” Policy.

## 2.3. Additional Points of Comparison

For planning purposes and operational consistency, RTS Access will include in this Plan requirements from other Subparts found in 49 CFR 37 of the federal regulations. As points of comparison, RTS Access will evaluate its processes for considering reasonable modification requests and for allowing service animals to ride (49 CFR 37 Subpart G). RTS Access will evaluate its procedures for handling complaints (49 CFR 37 Subpart A). The process that RTS Access follows for a reasonable modification request is described online at [https://www.myrts.com/Riders-Guide/A D A-Compliance](https://www.myrts.com/Riders-Guide/ADA-Compliance). For more details, refer to Subsection 2.5 of this Plan.

## 2.4. Comparable Paratransit Service

This subsection compares RTS Access service as it relates to the service criteria for complementary paratransit as required by Subpart F, §37.131. The criteria includes service area, response time, fares, trip purpose restrictions, hours and days of service, capacity constraints, and additional service.

### 2.4.A. Service Area as required in §37.131 (a) of the federal regulations

RTS fixed route service forms the basis for complementary paratransit. This is referred as the Required Area for paratransit service. RTS Access uses supplemental paratransit service in Level 1 to extend the service area coverage ¾ miles beyond the Required Area on weekdays and weekends, for a total service area of 1 and ½ miles. Suburban areas are now categorized as Community Mobility Zones. These zones are served by RTS demand responsive services. The Required Area and Level 1 cover some of the geographic areas now categorized as Community Mobility Zones. For the geographic areas that are still within the CMZs but outside the Required Area and Level, RTS Access has a Level 2 service area where it provides supplemental service on weekdays. For the geographic areas 1.25 miles outside the geographic boundaries of the CMZs and ½ mile outside the geographic boundaries where no CMZ exists, RTS Access has a Level 3 service area where it provides supplemental service on weekdays.

Living within the RTS Access service area is not a requirement for eligibility certification. However, RTS Access will provide paratransit service only to points within its service area as defined for weekdays and weekends. It will be the responsibility of customers living outside the service area to arrange for alternate transportation to and from the paratransit service areas.

Customers who live within a supplemental service area may elect to use the RTS Access supplemental service as described in Subsection 1.3.D Supplemental Service. Because RTS Access complementary paratransit mirrors RTS fixed route (Required Area), the coverage of the service area will vary. Areas served by demand responsive service do not require complementary paratransit. Exhibit 3 shows that the RTS Access buses serve the entire service area during weekdays, but weekend service runs in the Required Area and Level 1 only.

The service area maps do not represent the schedule of service. RTS Access customers may consult RTS Access Scheduling, RTS Customer Service, or RTS fixed route schedules to learn which times of day buses run in a specific location within the service area.

The supplemental service provided in Level 1, Level 2, and Level 3 may change if so authorized as a resolution from the Board of Commissioners.

A service change that affects the RTS fixed route service area will affect the RTS Access service area. If such a change is proposed, it will be subject to input from the public. Such changes may result in the loss or expansion of service for RTS Access customers. If such a change is approved, RTS Access will notify RTS Access customers in writing and continue to provide paratransit service for a pre-defined period to allow them to make adjustments or arrangements regarding their origins and destinations. Exhibit 5 provides the procedures and processes for public participation and describes the notification process.

### 2.4.B. Responding to Requests for Rides (Response Time) as required in §37.131 (b) of the federal regulations

Customers must call RTS Access staff (Schedulers) to request rides (“reserve,” “book,” or “schedule”). RTS Access will not allow Bus Operators to reserve rides.

The Schedulers will book rides occurring during the same hours and days as RTS fixed route services. The RTS Access Scheduling office is open from 8:00 AM to 5:00 PM Monday through Friday. Scheduling hours for Saturday, Sunday, New Year’s Day, Memorial Day, Independence Day, Labor Day, and Thanksgiving Day will be from 8:00 AM to 1:00 PM. The Scheduling office will be closed on Christmas day.

RTS Access has a phone line for scheduling (reserving) trips. To request a trip, customers must dial 585-224-8330, and press 3 at the prompt.

RTS Access has received funding to upgrade the reservation system to allow online reservations. The software product called “PASS Web” will provide customers of RTS Access with the online reservation capability to confirm, cancel, and book their own trips over the Internet.

RTS Access has phone lines for questions or requests unrelated to trip reservation. Customers can reduce hold times for those who are scheduling trips by using the appropriate phone lines designated for other types of calls. These phone numbers are online at <https://www.myrts.com/RTS-Access/Calling-RTS-Access>.

The Dispatch office is open 4:00 AM to 1:00 AM Monday through Friday and 5:00 AM to 1:00 AM on weekends. The Dispatchers’ primary job is to support bus operations. During Scheduling office hours, they will transfer trip requests to Scheduling. Dispatchers will schedule same-day trips when the Scheduling office is closed.

An individual trip has one outgoing ride with a single origin (pickup) and single destination (drop-off). Such a trip has one part, which can be explained as going from point A to point B.

A round trip has two booked rides, first outgoing from an origin to a destination, and then returning from the same destination to the same origin. A round trip has two parts, which can be described as going from point A to point B in the first part, and then going from point B to point A in the second part. Each trip must be requested and reserved explicitly with the RTS Access staff.

A multi-part trip connects several parts. The drop-off point for one part becomes the pickup point for the next part. For example, going from point A to point B is part 1 of the trip. Then, going from point B to point C is part 2. Going from point C to point D is part 3, and going from point D to point A is part 4 of the trip. In this example, the trip is not a round trip even though the end of the trip returns to the same point where part 1 originated (point A). A multi-part trip requires a reservation for each part. The trip described in our example would require four separate reservations.

Customers have the right to travel with one accompanying companion during the trip. The accompanying companion must travel the same trip, beginning at the customer’s origin and ending at the customer’s destination. Customers have the right to bring one child as the accompanying companion. If space is available and they do not displace other eligible riders with reserved trips, customers may bring more companions, including children. It is important to discuss the number of companions when scheduling the ride. RTS Access recommends that customers tell the Scheduler when they will travel with multiple children. Discussing the size of the group will ensure the trip includes the full group and does not infringe on the rights of other customers, who may be traveling with PCAs or companions on that same trip.

Safety is an important reason for discussing children with the Scheduler. The Scheduler may need to ask the age of the children accompanying the customer. Some paratransit rides are booked on sedans. New York State law requires that children under the age of four ride in child safety seats and that all children ride in child safety restraint systems until their 8th birthday. For safety, RTS Access will not transport children in sedans if they are younger than 8 years and/or are physically smaller than recommended. The child must weigh at least 80 pounds and measure 4 feet, 9 inches in height. Knowing the age of the accompanying children will allow the Schedulers to reserve the ride on the appropriate vehicle.

Customers have the right to travel with one Personal Care Attendant (PCA) who assists them with a daily life activity. The PCA must travel from the same origin to the same destination as the customer. A friend or family member is a PCA if the customer regularly makes use of a PCA and the friend or family member is actually acting to assist the customer with personal needs. RTS Access realizes that a child may act as a customer’s PCA. In these cases, RTS Access recommends that customers explain to the Scheduler that their PCA is a child when they schedule the trip. This is not a requirement. However, giving the information to the Scheduler will better ensure that the Bus Operator is informed in advance that the customer will board with a child acting as the PCA.

If a customer brings a PCA on his or her trip, the customer has the right to bring one child or one adult as an accompanying companion.

Customers have the right to travel with their PCAs, service animals, mobility devices, and assistive devices according to their needs. When reserving a ride, RTS Access Schedulers may ask whether the customer will travel with a PCA, a service animal, or a device. These answers will help the Schedulers to book a trip on a vehicle best suited for all the components to which each customer is entitled, especially during busy times of the day.

Customers have the right to travel with their service animals. The customers or PCAs are responsible for keeping the service animal under their control at all times. The service animal must not block the aisle and must not pose a direct threat to the health and safety of others. RTS Access Schedulers may ask if customers intend to ride with a service animal to ensure adequate space is available for the animal. The FTA guidance acknowledges that this practice is acceptable.

Customers must reserve the ride at least one day in advance to ensure a ride. This is “Next-Day” service. RTS Access will document any instance when it is unable to accommodate a ride request made the previous day.

Customers will have the option to book a ride up to five days in advance for trips in the Required Area and supplemental trips in Level 1 and Level 2. For trips in Level 3 of the service area (available during weekdays only), customers can book one day in advance. Customers can book up to six rides (three round trips) in advance during the same phone call. Booking rides in advance is an option, not a requirement. RTS Access recommends booking in advance to ensure getting the rides. However, RTS Access will accommodate same-day trip reservations if space is available.

RTS Access will require customers to stay a minimum of one hour between the drop-off at any destination and a return trip. The FTA guidance acknowledges that transit agencies may separate two trip requests by 60 minutes and, in some instances, 90 minutes. Every trip involves a pickup time, pickup window, and travel time. When a customer reserves a trip, the Schedulers need to know the origin, destination, time of travel, the number of people traveling, and the number of service animals. The FTA rules prohibit RTS Access from prioritizing one type of trip over another (excluding subscription trips). While it may seem sensible to allow the Bus Operator to wait a short period for one customer to perform an errand and return to the bus, doing so could delay the pickup or drop off for another customer. Allowing the Bus Operators to wait for some trips, but not for all trips, is not compliant with the regulations. As a shared ride service, RTS Access will strive to operate in a manner that is consistent for all trips.

RTS Access will grant occasional requests to interrupt the trip when a customer has an urgent need to use a restroom before reaching his or her planned destination. RTS Access will expect customers to make such requests out of necessity rather than personal convenience. The RTS Access Bus Operator will work with Dispatch to determine if there is a safe location for the customer to exit the bus and access a public restroom. If scheduling and safety conditions allow, the Bus Operator may wait at the location for the customer to return. However, in the interest of operating consistently, the Bus Operator may need to continue with the next pickups and drop offs as scheduled, and return to pick up the customer in a reasonable period of time to finish the original trip.

When booking a ride, the Scheduler will explain that the customer’s travel time on the bus could be up to one hour.

The Scheduler will ask “What time do you want to be picked up?” The Scheduler may negotiate pickup times, but cannot require customers to schedule their trip to begin more than one hour before or after the requested time. RTS Access will document any instance when it cannot schedule the ride within a one-hour window of the time requested. After negotiating the pickup time, the Scheduler will communicate the pickup period to the customer.

A pickup period is the window of time during which the customer can expect the bus to arrive for the pickup time. The window will start five minutes before the pickup time and end 15 minutes after the pickup time. After the pickup period begins, the Bus Operator will wait five minutes for the customer to show up for the booked ride. If the Bus Operator arrives before the pickup period begins, the Bus Operator will wait until the starting time of the pickup period and, if the customer has not yet appeared, then wait the additional five minutes.

For example, if the bus arrives at 1:12 PM for a 1:30 PM pickup, the Bus Operator must wait until the pickup period starts at 1:25 PM. If the customer does not appear at 1:25 PM for boarding, the Bus Operator must wait for a full five minutes to elapse (1:30 PM) before departing.

It is the Bus Operator’s responsibility to wait until the pickup window starts before counting down the five minutes. An “Early Departure” occurs if the Bus Operator departs before the pickup window starts. If customers miss their trip due to an early departure, they are encouraged to report it to RTS Access. RTS Access will excuse the missed trip when the Bus Operator departs early. RTS Access will work with individual Bus Operators as necessary. RTS Access customers can use any of these phone numbers to report early departures.

1. Dispatch Office, 585-654-0675
2. Scheduling Office, 585-224-8330, Option 3
3. Cancellations or No-Shows, 585-654-0647
4. Operations, 585-654-0747

If the bus arrives at 1:30 PM for a 1:30 PM pickup and the customer is not ready to board, the Bus Operator will wait for a full five minutes to elapse. If the bus arrives at 1:44 PM and the customer is not ready to board, the Bus Operator will wait for a full five minutes to elapse. If the customer is not actively boarding the bus by minute five, the Bus Operator will report a missed trip and proceed to the next pickup location.

If the bus arrives 16 minutes or more after the pickup time, RTS Access will require the Bus Operator to notify Dispatch. The bus will be considered late. If the late arrival will affect customers, RTS Access will contact and notify them of the issue. RTS Access will document any instance when it was late for a scheduled pick up.

RTS Access expects customers to use their booked rides. RTS Access expects customers to cancel any ride they do not need in advance.

Customers must cancel rides by phone. Bus Operators will not be able to cancel rides. Customers will have the ability to cancel rides 24-hours a day, 7-days a week by leaving a voice-mail message with their ride information. Customers can call 585-224-8529 or 585-224-8330, Option 1. When cancelling a round trip, the customer will need to cancel the pickup ride and the return ride. RTS Access will not cancel the return ride automatically.

RTS Access will expect customers to cancel an individual ride at least two hours before the pickup period starts. An “Advance Cancellation” is when the customer calls and cancels the ride at least two hours in advance of the pickup. Advance Cancellations will not carry any penalty.

A “Late Cancellation” will occur if the customer cancels a ride less than two hours ahead of the pickup period. RTS Access will count a Late Cancellation as a Service Infraction unless the customer notifies RTS Access that the situation was beyond his or her control.

The full Paratransit Service Infractions and Suspension policy is in Exhibit 6 of the Plan and explains the thresholds in detail.

### 2.4.C. Fares as required in §37.131 (c) of the federal regulations

With the exceptions of supplemental service in Level 2 and Level 3 and same-day service, RTS Access will charge customers no more than twice the fare it charges customers paying full fare (i.e., without regard to discounts provided to customers on the RTS fixed route) for a trip of similar length, at a similar time of day on the RTS fixed route.

Effective Summer 2020, the fares are as follows.

1. Total cost per trip is $2.00 in the Required and Regular (Level 1) Areas on weekdays and weekends.
2. Supplemental service in Level 2 during weekdays costs $5.00 per trip.
3. Supplemental service in Level 3 during weekdays costs $8.00 per trip.
4. Same-day service costs $6.00 in addition to the base fare per trip.

RTS Access will expect customers to pay the Bus Operator the exact fare each time they board. RTS Access will not allow Bus Operators to accept the fares for a round-trip in one transaction. For example, for a next-day round trip in the Required Service Area, customer must pay $2 when boarding for the outgoing trip, and then pay $2 when boarding for the return trip. It will be the customer’s responsibility to pay the exact fare amount. RTA Access will not allow a Bus Operator to provide change. RTS Access will not allow Bus Operators to transport customers, visitors, or companions who fail to pay the exact fare.

With the simplified fare structure, RTS Access is discontinuing the $18 Value Pass.

Customers can continue to purchase paratransit $20 Value Passes. The Bus Operator marks/deducts the appropriate amount for the ride from the pass.

RTS Access is discontinuing its Rider Rewards Program. In lieu of Rider Rewards, any customer who purchases a $20 Value Pass will receive the equivalent of $22 in fares.

Information about fares and purchasing passes is available online at this website address: <https://www.myrts.com/RTS-Access/Fares-Passes>.

Customers can purchase Value Passes online, over the phone, from an RTS Access Bus Operator, or at the Reception Desk at the RTS Campus.

Customers can perform the online transaction at the following website address: <https://www.myrts.com/Buy-Passes/rts-access>. To purchase a pass by phone, customers can call 585-426-3520 and press Option 0.

When purchasing a paratransit $20 Value Pass directly from an RTS Access Bus Operator, the customer must pay the exact amount for the pass at the time of purchase.

The Reception Desk is located at 1372 East Main Street, and is open Monday through Friday from 8:00 AM to 5:00 PM.

RTS Access will expect customers to show the Bus Operator their Access Photo ID Smartcard each time they board. RTS Access will not allow Bus Operators to transport customers who do not show photo identification.

An eligible customer must pay the appropriate fare for the trip and show his or her Access ID Smartcard to board the RTS Access bus.

An eligible visitor must pay the appropriate fare for the trip and show proof of eligibility or visitor status to board the RTS Access bus.

A single personal care attendant (PCA) must ride the same origin to destination trip with the customer or visitor to board the RTS Access bus. The PCA does not pay a fare.

A single companion must pay the appropriate fare for the trip and ride the same origin to destination trip with the customer or visitor to board the RTS Access bus.

Any additional companions must pay the appropriate fare for the trip and ride the same origin to destination trip with the customer or visitor if space is available.

Customers with Conditional or Temporary eligibility can ride any RTS fixed route service free by tapping their RTS Access Photo ID Smartcard on the farebox reader when they board. If the eligibility certification is expired or they do not tap or show their RTS Access Photo ID Smartcard, they will be required to pay the fixed route fare when riding RTS fixed route ($1.00 per trip).

Applicants whose complete application is processing are not eligible to ride RTS Access. Applicants can ride RTS fixed route and must pay the RTS fixed route fare. However, if the complete application is not processed 21 days after receipt, the applicant is granted the ability to ride RTS Access temporarily until the decision is issued. During the temporary period, the applicant must pay the appropriate fare for the trip and show a photo ID to board the RTS Access bus. During the same period, the applicant may ride RTS fixed route service free. RTS Access may need to notify RTS of the arrangement and perform appropriate coordination.

Any appellant whose appeal decision is not issued within 30 days of the scheduled hearing will be granted the ability to use paratransit temporarily until the appeal decision is made. During the temporary period, the appellant must pay the appropriate fare for the trip and show a photo ID to board the RTS Access bus. During the same period, the appellant may ride RTS fixed route service free. RTS Access may need to notify RTS of the arrangement and perform appropriate coordination.

Any pet in a cage must remain under its handler's control at all times in order to board the RTS Access bus. The pet's cage cannot block the aisle. There is no fare for the pet.

Any service animal must remain under its handler's control at all times in order to board the RTS Access bus. There is no fare for the service animal.

### 2.4.D. Absence of Restrictions or Priorities on Trip Purpose as required in §37.131 (d) of the federal regulations

RTS Access will not impose any restrictions or priorities based on trip purpose for origin-to-destination next-day service, same-day service, or supplemental service. When a customer reserves a ride, RTS Access will need to know the origin, destination, desired pick-up time, the number of people traveling (i.e. PCA or companion), and the number of service animals traveling. RTS Access may limit subscription service to certain trip purposes, such as day-treatment programs or employment.

### 2.4.E. Hours and Days of Service as required in §37.131 (e) of the federal regulations

The goal of RTS Access is to provide paratransit service on the same days, during the same hours, and in the same corridors as RTS fixed route service. During times when RTS fixed route service does not operate, or if it does not travel to certain locations, RTS Access paratransit service will not be available on those days or travel to those locations. The span of service for RTS Access paratransit service will mirror the span of service for RTS fixed route service, including on holidays. RTS Access will follow a weekend schedule during the following holidays: New Year’s Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, the Day after Thanksgiving, and Christmas Day.

### 2.4.F. Lack of Capacity Constraints as required in §37.131 (f) of the federal regulations

RTS Access will not limit the availability of complementary paratransit service. It will not limit the number of trips per day or trips per person that can be made. With the exception of Trip Subscriptions, RTS Access will not use waiting lists for access to service or any operational pattern or practice that significantly limits the availability of service to RTS Access customers.

RTS Access will take steps to ensure that it provides timely pickups within 20 minutes of the scheduled time (5 minutes prior and 15 minutes after). Travel time on paratransit service will be comparable to the amount of time it would take to make the same trip using RTS fixed-route bus service with connections. When customers have two or more rides on the same day, RTS Access will require a minimum of 60 minutes (1 hour) between each drop-off and pickup time.

To encourage timely service, on-time performance will continue to be measured for RTS Access in the Transit Operations Performance Scorecard (TOPS) in accordance with company procedures for recording, calculating, and reporting time points, as described in section 2.2.F. Lack of Capacity Constraints.

### 2.4.G. Additional Service §37.131 (g) and §37.133

Based on available capacity RTS Access will offer trip subscriptions. Subscriptions will not absorb more than 50% of the number of trips available at a given time of day, unless there is non-subscription capacity. RTS Access will make the maximum percentage of subscription trips available based on capacity. Exhibit 4 of the Plan provides the procedures and processes for Subscription Service.

## 2.5. Additional Components of Comparable Paratransit Service

For planning purposes and operational consistency, RTS Access is including requirements from other Subparts of 49 CFR 37 in this Plan as points of comparison. From 49 CFR 37 Subpart G—Provision of Service, RTS Access will evaluate its processes for reasonable modification requests and service animals. From 49 CFR 37 Subpart A—General, RTS Access will evaluate its process for complaint procedures.

### 2.5.A. Process for Considering Requests for Reasonable Modification as required in Subpart G, §37.169 of the federal regulations

RTS and RTS Access shall make reasonable modifications to policies, practices, and procedures when such modifications are requested and necessary to avoid discrimination based on disability. RTS and RTS Access shall deny any request that will create a direct threat to the health or safety of others; or fundamentally alter the nature of services, programs, or activities; or result in an undue financial and administrative burden. RTS and RTS Access may deny a requested modification if the individual with a disability is able to use services, programs, or activities for their intended purpose without the requested modification. RTS and RTS Access will expect customers to call and request reasonable modifications in advance when possible. This is particularly appropriate where a permanent or long-term condition or barrier is the basis for the request. This process will allow RTS and RTS Access to make the necessary determinations in advance of the need for modified service. When doing so, RTS and RTS Access will expect customers to describe what they need in order to use the bus service (but will not require customers to use the term “reasonable modification” when making the request). Applicants for paratransit service can include the request for reasonable modification during the eligibility process. Otherwise, customers may make modification requests directly to the Bus Operator at the time they are needed.

RTS and RTS Access operating personnel will make a determination whether the modification should be provided at the time of the request. Operating personnel may consult with management before making a determination to grant or deny the request. Many locations represent a direct threat to safety if the Bus Operator attempts to drive in reverse (back up). If the safety of a location has not been assessed, and a customer requests a reasonable modification that requires the bus to back up, the Bus Operator will work with Dispatch to determine the best way to assist the customer. RTS or RTS Access will then follow-up with a safety assessment of the location. If, after a safety assessment, backing the bus up in that location is deemed a direct threat to the safety of others, RTS or RTS Access will notify the customer and the Bus Operators that future requests requiring the bus to back up in that location will be refused, even if the original request was accommodated.

RTS and RTS Access will not provide personal care attendants or personal care attendant services to meet the needs of customers with disabilities during their trips. If a customer requests assistance with carrying a single bag or package, RTS and RTS Access will consider the request a reasonable modification. However, requests that would require the Bus Operator to make multiple trips or to carry several items fundamentally alter the Bus Operator’s function. As a result, RTS and RTS Access will direct the Bus Operator to decline such requests.

If a customer requests the Bus Operator to remain at a destination because the customer cannot be left alone without an attendant, RTS and RTS Access will direct the Bus Operator to decline the request because it would fundamentally alter the Bus Operator’s function to provide personal care attendant service of this kind.

For the same reason, RTS and RTS Access will direct Bus Operators to decline requests to reach into pockets or backpacks to extract fare media or to lift the customer into or out of a mobility device such as a wheelchair or scooter (hand-carry). RTS and RTS Access will direct Bus Operators to decline requests to carry an individual or support the full weight of an individual.

RTS Access will grant a reasonable request for door-to-door assistance as a reasonable modification to its curb-to-curb service. In order for the Bus Operator to provide door-to-door assistance, there must be a safe place to park the bus or sedan on a public roadway or parking lot, and, the path between the vehicle and destination entrance must be safe and accessible. When parked, the RTS Access vehicle cannot block or impede traffic.

RTS Access makes an important distinction between door-to-door and door-*through*-door assistance. During door-to-door, the Bus Operator provides assistance from the curb to the door of the destination, or from the external door of building to the curb where the customer can board the bus. However, the Bus Operator will not assist the customer through the door into the building or enter a building to assist the customer to the exit. Helping a customer through the door into or out of the building or residence is the type of assistance provided by a PCA, and is outside the Bus Operator’s function. As a result, RTS Access will instruct Bus Operators to decline requests to assist the customer through the door of a building or to enter the building to assist the customer. The Bus Operator may open a public building’s external door or operate the door activation push button. The Bus Operator will not unlock a locked door, operate a paging system, or accompany a customer to or from a waiting room or reception area. Customers are responsible for making sure another person or PCA is available to assist them in such situations.

If a customer believes RTS or RTS Access has not complied with the requirement to make a reasonable modification, the customer will need to file a complaint within 30 days after the date of the alleged violation. The customer can either file a hardcopy form through the United States Postal Service or send the form as an electronic file online. The Reasonable Modification Complaint form is available online at [https://www.myrts.com/Riders-Guide/A D A-Compliance#resmodnon](https://www.myrts.com/Riders-Guide/ADA-Compliance#resmodnon). Customers can also request the form by calling Customer Service or RTS Access Scheduling.

To send a hardcopy complaint, print and complete the Reasonable Modification Form. Mail the Reasonable Modification Form via USPS to the following address: R G R T A Legal Affairs Department, 1372 East Main Street, Rochester, NY 14609.

To send the complaint electronically, download the form and complete it. Create an electronic copy of the form (for example, a scanned PDF). Use the online Contact Us form available at <http://rts.force.com/RTSContactUs> to initiate a complaint, attach the completed Reasonable Modification Complaint form, and submit the complaint.

R G R T A will provide general assistance, language, or disability assistance during administrative business hours.

Customers can call 585-654-0771 to request general assistance. Customers can call 585-288-1700 to request language or disability assistance.

R G R T A will conduct a review based on the submitted facts, the written complaint, and ask additional questions if necessary. R G R T A will issue a decision in writing within 30 days after the date of the review. A customer may also file a complaint directly with the Department of Transportation, Departmental Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590. Phone: 202-366-4648 or TTY/Assistive Device: 202-366-9696.

Exhibit 7 of this Plan contains the forms.

### 2.5.B. Service Animals as required in Subpart G §37.167 (d) of the federal regulations

Customers have the right to travel with their service animals. Schedulers may ask customers if they think they will bring their service animal on a trip. The purpose of this question is to help ensure adequate space for the service animal along with other customers sharing that ride (as well as their accompanying companions, PCAs, and devices). The FTA considers this question to be an acceptable practice.

The regulations allow a transit provider to ask if the animal is a service animal, or ask what tasks the animal has been trained to perform. The regulations prohibit transit personnel from asking a customer to describe or demonstrate his or her disability, and from asking for proof of the service animal’s certification or identification.

Caring for a service animal is the responsibility of the customer or PCA. RTS and RTS Access Bus Operators will not take charge of a service animal.

Service animals must not block the bus aisle. It is the responsibility of the customer to position service animals so that other customers can use the aisle safely. RTS and RTS Access Bus Operators may ask customers to adjust the position of the service animal if all or some of the animal is blocking the aisle and preventing safe passage for other customers. Service animals must not pose a direct threat to the health and safety of others. Under such circumstances, RTS and RTS Access may deny service until the service animal is under control.

Animals with the singular role of providing comfort or emotional support to an individual do not qualify as service animals under the Americans with Disabilities Act. Customers can travel with these animals, but RTS and RTS Access will apply the same requirements as are applied to pets.

RTS and RTS Access will treat a request for a service animal to sit on the seat next to the customer or in the customer’s lap as a reasonable modification, provided the service animal is under the customer’s control at all times and does not disrupt service (i.e. displace paying customers).

### 2.5.C. A D A Complaint Procedures as required in Subpart A, §37.17 of the federal regulations

Any qualified person with a disability who believes she or he has been discriminated against based on his or her disability by R G R T A may file a written, formal A D A Complaint.

The A D A Complaint Form is available online at [https://www.myrts.com/Riders-Guide/A D A-Compliance#resmodnon](https://www.myrts.com/Riders-Guide/ADA-Compliance#resmodnon). The form can be requested by calling Customer Service or RTS Access Scheduling.

To send a hardcopy complaint, print and complete the A D A Complaint Form. Mail the A D A Complaint Form via USPS to the following address: R G R T A Legal Affairs Department, 1372 East Main Street, Rochester, NY 14609.

To send the complaint electronically, download and complete the A D A Complaint Form. Use the online Contact Us form available at <http://rts.force.com/RTSContactUs> to initiate a complaint. Then, attach the A D A Complaint Form and submit it.

A person may also file a complaint directly with the Department of Transportation, Departmental Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590. Phone: 202-366-4648 or TTY/Assistive Device: 202-366-9696.

R G R T A will provide general assistance, language, or disability assistance during administrative business hours.

Customers can call 585-654-0771 to request general assistance. Customers can call 585-288-1700 to request language or disability assistance.

R G R T A will investigate complaints received no more than 180 days after the alleged incident.

R G R T A will process complaints that are complete. Once the complaint is received, R G R T A will review it to determine if R G R T A has jurisdiction. The complainant will receive an acknowledgement letter informing her or him whether the complaint will be investigated. R G R T A has 30 days to investigate the complaint. If more information is needed to resolve the case, R G R T A may contact the complainant. The complainant has 20 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 20 business days, R G R T A can administratively close the case. A case can be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she or he will issue one of two letters to the complainant: a closure letter, or a letter of finding. A closure letter summarizes the allegations and states that there was not an A D A violation and that the case will be closed. A letter of finding will summarize the allegations and the interviews regarding the alleged incident, and explain whether any disciplinary action, additional training of the staff member or other action will occur.

If the complainant wishes to appeal the decision, she or he will have 30 days after the date of the closure letter or the letter of finding to do so.

## 2.6. Time-Line of Implementation

This subsection provides the timetable for implementing comparable paratransit service as required in Subpart F, §37.139 (d) (5) of the federal regulations. For the purposes of this timeline, the Rochester-Genesee Transportation Authority will be referred to as, “the Authority.”

In 1985, the Authority established Lift Line Inc. (now RTS Access) to provide paratransit service.

In 1987, the Authority adopted a Service Plan for accessible transportation.

In 1988, the Authority reaffirmed support for the accessible service plan.

In 1992, the Authority adopted an Accessible Transportation Service Plan for fixed-route service and complementary paratransit service and submitted it to the FTA.

In 1993, the Authority approved a Paratransit Plan update.

In 1994, 1995, and 1996, the Authority approved a Paratransit Plan update documenting the results of A D A implementation, in an effort to achieve full compliance.

In 2014, the Authority adopted changes to the Paratransit Plan effective October 1, 2014. The proposed changes were as follows: 1) the Paratransit service area in Monroe County will be ¾ mile from all qualifying fixed route, 2) the Supplemental Paratransit service area will be 1 ½ miles from the Paratransit service area, 3) new applicants waiting for an eligibility determination for paratransit service will pay the standard RTS fare if they elect to ride RTS, and 4) scheduling hours for RTS Access will be consistent with RTS administrative hours and to accommodate next day scheduling.

In 2017, activities for the Reimagine RTS project began. From October to December 2017, the Authority gathered input and set goals. RTS Access proposed updates to the Paratransit Plan and held a public hearing on November 28, 2017. Public comments were accepted until January 5, 2018. The Authority published a response to the comments in June 2018.

From January to April 2018, the Reimagine RTS project involved determining guiding principles and goals, and developing a mobility toolbox.

From May to July 2018, the Authority released the draft recommendations for the fixed route system from TMD for review and community input.

In August 2018, the Authority released the final recommendations for the fixed route system for review and community input.

From the Fall of 2018 through the Winter of 2019, the Authority sought recommendations for mobility options and community feedback.

Additional revisions to the Paratransit Plan continued through the Winter of 2019.

In 2019, RTS Access will propose the Paratransit Plan for service changes going into effect in Summer of 2020 to the public for comment.

Exhibit 10 of this Plan provides descriptions of the resolutions authorizing the actions identified in this timeline.

## 2.7. Multi-Year Budget

This subsection provides budget information as required in Subpart F, §37.139 (d) (6) of the federal regulations. For 2019-20, RTS Access will replace 9 buses at a cost of $759,126.

The Genesee Transportation Council (GTC) is the designated Metropolitan Planning Organization (MPO) responsible for transportation policy, planning, and investment decision making in the Genesee-Finger Lakes Region. GTC will fund an RTS Access Ridership and Facility Evaluation Study project. The project will consist of hiring an outside consultant to forecast paratransit ridership demands for RTS Access. The consultant will utilize these forecasts to determine infrastructure requirements and make recommendations specific to facilities, fleet size and composition, and staffing. This information will help guide the long-term capital planning for RTS Access.

End of Section 2

Exhibits for Section 2

The exhibits included in Section 2 are Exhibit 5: Public Participation Plan and Notification Policy, Exhibit 6: Service Suspension Policies, Exhibit 7: Complaints, Exhibit 8: Timely Service, Exhibit 9: No Strand Policy, and Exhibit 10: Time-Line of Implementation.

Exhibit 5: Public Participation Plan and Notification Policy

Exhibit 5 contains the full Public Participation Plan and the full Notifications Regarding Changes to the RTS Access Service Area policy.

Rochester-Genesee Public Transportation Authority Public Participation Plan, June 2017-2020

1. Purpose

This plan documents the public involvement process and procedures of the Rochester Genesee Regional Transportation Authority (“the Authority”). If requested, a Spanish translation of this plan will be provided. Those who are blind or have low vision may request a large type format or Braille version of the plan. Additionally, the plan is available on the R G R T A website at [www.myRTS.com](http://www.myRTS.com).

2.0 Current Business Profile

The Authority is comprised of nine subsidiary transportation service companies, the largest of which is Regional Transit Service. One of these subsidiaries, RTS Access, provides comparable complementary paratransit service in Monroe County.

Ridership: 17.7 million total, RTS (16.5 million)

Service Area Population: 1,191,689 total, RTS (749,600)

Employees: 900+ total, RTS (624)

Annual Miles: 11 million total

Fleet Size: 421 total, RTS (219), RTS Access (53), RTS Genesee (12), RTS Livingston (22), RTS Ontario (42), RTS Orleans (7), RTS Seneca (10), RTS Wyoming (14), RTS Wayne (42)

3.0 Language Assistance

Data gathered by our paid market research consultant has indicated that bi-lingual customers of our largest subsidiary, Regional Transit Service (RTS), are not experiencing difficulty using our system, communicating with our staff, or reading our schedules and informational materials used to guide and inform our customers. Nonetheless, the Authority acknowledges that, with a ridership of over 17.7 million and a service area population of 1,191,689, the likelihood of limited English proficient customers certainly exists. This Public Participation Plan was created to encourage community involvement while meeting needs for language assistance for Limited English Proficient customers.

4.0 American’s with Disabilities Act (A D A)

The Americans with Disabilities Act (A D A) of 1990 encourages the involvement of people with disabilities in the development and improvement of transportation and paratransit services. In accordance with A D A guidelines, all meetings conducted by the Authority take place in locations that are accessible to persons with mobility limitations.

When necessary to ensure effective communication, auxiliary aids and services are furnished to allow a person with a disability to participate, unless an undue burden or fundamental alteration would result. “Auxiliary aids” include services or devices such as qualified interpreters, assistive listening headsets, television captioning, decoders, telecommunication devices for deaf persons (TDDs), videotext displays, readers taped text, brailed materials, and larger print materials. The public meeting notices specify that special accommodations will be provided upon request.

5.0 Public Participation

The vision of the Authority is to be the preferred transportation choice. To achieve this vision, it is incumbent upon the Authority to provide an affordable and accessible, high quality transportation service to the constituents of its service area. Essential to creating transportation service that meets these fundamental transportation needs is an open, responsible organization that provides clear and timely messaging about services, is transparent in process, and encourages input through an inclusive involvement process. This open communication and involvement is expressed unequivocally to all customers as well as to community leaders and transit stakeholders from the business, social services, and institutional sectors.

To ensure that citizen input occurs on a regular basis, public meetings are scheduled routinely and in the event of special projects. The advent of new technologies has afforded the Authority with the opportunity to interact with and seek involvement from members of its service area more broadly than in the past. Social media, texting, and email are invaluable tools for soliciting input about the needs and desires of the community, thereby allowing the Authority to gather public input to tailor programs and initiatives to serve the citizens in the area.

5.1. Social Media, Email and Text Outreach

The Authority uses social media, text messages, and email newsletters to interact with individuals, groups, businesses, and strategic partners to improve customer satisfaction. Social media and direct email communication is used as a method of public participation as well as information sharing and gathering.

5.2. Public Website

The Authority provides transparency into the organization through the posting of minutes and other governance related documents on its website (www.myRTS.com). The website is also utilized for customer outreach and includes an interactive route planner, a “Special Projects and Route Planning” section and comment submission capabilities.

The website provides basic information about the Authority, including the most up to date information regarding fares, schedules, events, programs, and news. All public workshops, information meetings, and hearings are advertised on the website ([www.myRTS.com](http://www.myRTS.com)). The website is also used as a medium in which customers and the public can provide comments during a study.

5.3. Digital & Newspaper Advertisements, and News Releases

To solicit participation, these media are used to advertise changes in fares and service, as well as the meetings and hearings associated with such changes. These mediums are also used to advertise and disseminate information about R G R T A that at times may be strictly informational only and may not require public participation.

5.4. Meetings

Public information meetings are valuable for offering information, gathering community input, raising community awareness, and for developing trust and a sense of partnership with the community. For the Authority, public information meetings are held in the following formats:

5.4.A. Neighborhood Meetings

These meetings are intended to offer information and gather input from residents living directly around the RTS campus in the City of Rochester. The Authority has fostered a strong relationship with the Beechwood Neighborhood Coalition, the North East Main Neighbors United, and the East Main Street Business Association.

The Authority often provides slides and image boards to illustrate topics of discussion. Participants are encouraged to ask questions of Authority staff members in attendance. Questions are answered during the meeting or, when needed, in-depth answers are provided as a follow up to the meeting. All customer and community feedback are entered into our Customer Relationship Management (CRM) tool.

Neighborhood meetings are advertised by the neighborhood association via email to its membership as well as on its website. The Authority also mentions its attendance at neighborhood meetings on its social media outlets.

5.4.B. Public Meetings

Notices for public meetings are advertised on the website ([www.myRTS.com](http://www.myRTS.com)), and via other social media outlets, as well as in buses, on bus shelters and community bulletin board locations in the service area where the meeting is scheduled to take place. Targeted customers may be sent an email, text, or direct mail communication regarding information meetings thought to be of particular interest to them. For example, a meeting seeking to provide information to and receive input from the paratransit community would be promoted by sending email or direct mail communication to all registered paratransit customers in addition to the general postings in the community and on the Authority website and Facebook and Twitter page.

1. PUBLIC LISTENING/INFORMATION SESSIONS

The sessions are held at handicap accessible facilities at varying times during the day to accommodate the schedules of those interested in attending. Meetings are facilitated by members of the Service Planning Department along with staff from the Communications & Marketing Department and other relevant staff members as appropriate for the issue at hand.

Public Information Sessions typically include an American Sign Language Interpreter. If attendees request the presence of one or more language interpreters, or request other auxiliary aids, those are provided as well.

1. PUBLIC MEETING PRESENTING DRAFT ALTERNATIVES

As routes are revised, customer input is collected and incorporated where possible. A public meeting is held for presenting draft route adjustment alternatives. These meetings are held at an accessible facility. Public meetings presenting draft Alternatives are facilitated by members of the Service Planning Department along with staff from the Communications & Marketing and Customer Service Departments and other relevant staff members as appropriate for the issue at hand.

1. PUBLIC NOTIFICATION OF FINAL RECOMMENDATIONS

If a recommended route adjustment does not require a public hearing, final recommendations are posted on the website ([www.myRTS.com](http://www.myRTS.com)) along with a timetable for implementation.

5.4.C. Public Hearings

If a formal public hearing is required, a presentation will be made that provides information about the need and purpose of the proposal being presented.

Members of the public are invited to register to speak at the hearing or to submit written comments. The presentation will also be posted on the Authority’s website and the public will be able to submit written comment for at least 3 days following the hearing.

Basic questions regarding the proposal may be addressed during the hearing at the discretion of the presenter; however, detailed questions will be answered in writing and posted on the Authority’s website within a reasonable amount of time after the close of the public comment period. These questions and answers will be made a part of the official transcript of the proceeding. Public hearings are facilitated by staff from the Communications & Marketing Department along with members of the Service Planning Department, other relevant staff and a member, or members, of the Executive Management Team.

These meetings are advertised as public hearing notices in the local daily newspaper, the Democrat and Chronicle, as well as on the website ([www.myRTS.com](http://www.myRTS.com)), via social media posts, signage on buses, news releases issued to local media outlets, and invitations to customers and special groups. When prudent, paid public hearing notices will also run in the community newspapers prevalent to the affected town or village. Paid advertisements include contact information about the availability of language assistance.

All attendees are asked to register their attendance regardless of whether they have asked to speak. The Authority will provide all attendees with a comment card for their use. Public hearings are recorded by a stenographer so that the meeting, along with all written commentary, questions, and answers are recorded and made a part of the public record. The entire record of the hearing is presented to the Authority Board of Commissioners before a decision is made on the proposal.

The Authority will provide a report of all public comments received, its responses to the comments, and any recommended changes in the proposal because of public comment to the Board of Commissioners. The report will be posted to the website ([www.myRTS.com](http://www.myRTS.com)). The Board of Commissioners may authorize the implementation of the changes or may direct other action.

5.4.D. Open House – RTS/Paratransit

These meetings are intended to offer information and gather input from customers and community stakeholders about RTS service. They are held on a quarterly basis in various accessible locations around the RTS service area and are typically facilitated by members of the Communications & Marketing Department, the Customer Service Department, and a member or members of the Executive Management and Leadership Teams. Some RTS Open Houses have a scheduled topic for discussion that is publicized before the meeting and others are conducted as an open forum to address any issues that members of the public bring forth. The Authority will track the customer feedback received during the open houses in a Customer Relationship Management System and customers are contacted, if they indicate they would like a follow up regarding their concern or question within 1 week after the open house is held. Future consideration may be given to host these “open forum” meetings virtually in an on-line chat format to allow even greater public participation.

5.4.E. Informal Community Meetings

These meetings are held at the request of specific community groups who take on the responsibility of advertising the meeting and inviting the participants. Authority personnel make every effort to provide complete, accurate, and timely information at these opportunities. Questions asked and concerns raised that cannot be resolved at the meeting will be resolved afterward and the resolution communicated to those in attendance, either in written form by the project manager or at a follow-up meeting. Meeting organizers are encouraged to inform Authority meeting planners of the need for language assistance service prior to the meeting so that arrangements can be made. Some of the meetings of this nature are held to gain public input, while others are organized to provide instruction on how to ride the bus.

5.5. Regional Customers

In addition to RTS and RTS Access, the Rochester-Genesee Transportation Authority is comprised of seven regional transportation subsidiaries. They are RTS Genesee, RTS Livingston, RTS Ontario, RTS Orleans, RTS Seneca, RTS Wayne, and RTS Wyoming. The Authority provides information to and seeks commentary from customers residing in the communities serviced by these transit subsidiaries utilizing the same methods employed by RTS. In addition, regional bus schedules printed in Spanish (paper and electronic format) are made available in those regions with a high Hispanic population, as are bus shelter schedule information posters. A “How to Enjoy the Ride Guide” (paper format) is also distributed by the regional subsidiaries.

6.0 Equity Impact or Fare Changes

The Authority undertakes public participation and outreach process for

1. Major service changes determined to have disparate impact; or
2. Major service changes determined to have disproportionate burden; or
3. Fare changes.

This process includes public outreach, solicitation of public comment, and public hearing.

The Authority will translate materials into, and provide translation services for, the language of any LEP language group as specified in the Language Assistance Plan.

Special promotional fares are not included in the requirements of this section.

6.1. Public Outreach

The Authority posts information and accepts comments regarding the proposed changes in person (written or verbal), on its website, and via the USPS mail. The Authority will:

1. Hold multiple public information meetings in affected communities;
2. Hold stakeholder group meetings; and
3. Present changes to elected government officials.

The Authority will consider the population likely to be affected and the resources available to determine how best to enhance participation by affected minority, low-income, and/or LEP persons. The purpose of these efforts is to include minority, low-income, and LEP populations in the planning stages.

6.2. Soliciting of Public Comment

The Authority will disseminate information, solicit public comment, and respond to public comment on transit service and fare changes to the extent reasonable and practical.

Fare changes or major service changes are submitted to the Authority Board of Commissioners upon an initial round of public discussion.

6.3. Public Hearing

Anytime the Authority conducts a public hearing, the Board of Commissioners will authorize formal solicitation of public commentary. The Authority will conduct public hearings for situations including, but not limited to, a major service change found to have either a disparate impact or a disproportionate burden, or a proposed fare change.

The Authority will publish a notice of the proposed change(s) in newspapers of general circulation and, if applicable, in newspapers oriented to the specific groups or communities affected and in buses. Such published notices will include the date, time, and location of any public hearings.

Not sooner than 30 days after the notices are published and posted at least one public hearing shall be held.

The Authority will provide a report of all public comments received, its responses to the comments, and any recommended changes in the proposal because of public comment to the Board of Commissioners. The Board of Commissioners may authorize the implementation of the changes or may direct other action. Final public notice of major changes in service or any changes in the fare structure will be given via the methods stated above.

7.0 Proposed Minor Route/Schedule Changes or Route Overhaul Projects

7.1. Route Overhaul Projects

The Authority’s Service Planning Department will hold two or three Public Listening/Information Sessions to get initial input from customers about the route. Communications & Marketing will notify the media about the sessions and publicize the sessions through social media, on buses, email and text messages. Communications & Marketing solicits public input through all its communication channels: social media, online, phone, and in person.

Then, the Service Planning Department will hold two to three Public Meetings Presenting Draft Alternatives to show proposals and get feedback. Finalized route overhaul changes are posted on the website and communication through the Communications & Marketing Department during regular quarterly schedule change communications.

7.2. Minor Route and Schedule Changes

Except when impossible because of an emergency condition, advance notice of not less than two weeks will be given to the affected public of minor route and schedule changes. Methods of providing such notice include but are not limited to: distribution of revised timetables, handouts, posted notices and/or media releases. In addition, one month's advance notice of any permanent route change will be provided to the elected officials representing any affected local government entity.

8.0 Additional Participation Tools

8.1. Language Line

In order to be responsive to the language needs of its constituency, the Authority has established a Language Line account, which provides the Authority with reliable and swift access to interpreter services in more than 100 languages.

8.2. Spanish Bus Schedules

All RTS Route schedules are complemented with Spanish language translations, when requested by customers.

8.3. Comment Cards

Comment Cards are used to solicit customer input on specific complaints, suggestions, compliments, and questions. The feedback is tracked within the Customer Relationship Management (CRM) system.

8.4. Post Cards

Self-addressed post cards are handed out to the public at key locations (park & ride stops, high volume stop and shelter locations) to facilitate customer response on specific issues.

8.5. TTY

The Customer Service Department provides a TTY line for customers who are deaf or hard-of-hearing.

8.6. Braille

The Authority utilizes a Braille translation service for customers who require Braille translated printed materials. These are provided upon request.

8.7. Large Print Brochures / myRTS.com Font Size & Screen Reader

Large print format is available upon request for materials. The font size can be enlarged on the website ([www.myRTS.com](http://www.myRTS.com)) and is compatible with online screen readers to assist customers with low-vision or vision loss.

End of Public Participation Plan, June 2017-2020 in Exhibit 5.

Notifications Regarding Changes to the RTS Access Service Area Policy

1. RTS Fixed Route Service Changes

RTS fixed route service may undergo route overhauls, service changes, or major service changes. The RTS system may undergo system-wide adjustments or incorporate new products.

A Major Service Change is a change or changes in any RTS fixed route other than a subsidized route extension, an experimental route, or an express transfer service route that either:

1. Changes the number of service hours operated on a route by 25% or more; OR
2. Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

A Route Overhaul improves service efficiencies, aligns service profiles to current customer volume and destination demands, and integrates changes in the operating environment into the route structure.

The change may result in the reduction of service, the expansion of service, or alteration of the service area.

Whenever RTS implements a service change that affects its routes or service area, the change will be replicated in the RTS Access complementary paratransit service area.

* 1. Reductions to RTS Access Service Area

If an RTS fixed route service change reduces the service area for RTS Access complementary A D A paratransit, RTS Access will identify the customers affected and issue a written notification to each customer explaining the change. The notification will include a list of alternate transportation providers.

RTS Access will strive to notify impacted customers at least 30 days before the effective date of the change. Impacted customers will have an interim period of at least 120 days from notification or 90 days from the effective date—whichever is later. Customers may use the interim period to implement new arrangements to meet their travel needs while continuing to schedule trips with RTS Access to destinations affected by the service change. After the interim period ends, RTS Access will schedule trips within the defined service area only.

It will be the customer’s responsibility to arrange for alternate transportation to reach pick-up points within the RTS Access service area or to travel from the RTS Access service area to any destination outside the service area.

Customers will be asked to provide signed acknowledgement regarding the change and their responsibilities.

RTS Access may also contact affected customers via Interactive Voice Response audio to notify them about the change, to notify them about the requirement to make alternative arrangements within the interim period, and to relay information about alternate transportation providers.

RTS Access will log when an affected customer is notified and whether the customer provided the acknowledgement as requested. Customers who do not provide acknowledgement will still be subject to the service change.

RTS Access will not grant extensions or retro-activity.

End of the Notifications Regarding Changes to the RTS Access Service Area Policy in Exhibit 5.

End of Exhibit 5.

Exhibit 6: Service Suspension Policies

Exhibit 6 contains the procedure for Paratransit Service Infractions and Suspensions, the procedure for Paratransit Service Suspensions for Prohibited Conduct, and the Request to Appeal a Service Suspension due to Repeated Service Infractions.

Please note that the procedures for appealing a service suspension are in Exhibit 11 in the Paratransit Appeal Process and Procedures.

Paratransit Service Infractions and Suspensions

1.0. Policy

RTS Access expects customers to use their trips. If, as an RTS Access customer, you fail to use your booked trips repeatedly, you will get a service suspension.

##### 1.1. Definitions

A “Service Suspension” is a temporary period when you cannot use RTS Access service.

A “Pickup Period” is the 20-minute window of time scheduled for the bus to arrive for your pickup. After the Pickup Period begins, the RTS Access Bus Operator will wait 5 minutes for you to show up for the scheduled ride.

The “5-Minute Waiting Period” is the amount of time an RTS Access Bus Operator must wait for you to appear for the scheduled pickup. The waiting period cannot start before the start of the Pickup Period. If the Bus Operator arrives before the Pickup Period begins, the Bus Operator will not start the 5-Minute Waiting Period until the Pickup Period begins. It is the Bus Operator’s responsibility to apply the Pickup Period correctly. If the Bus Operator begins the countdown early and then departs without you, call 585-654-0675 to report it as an Early Departure.

No-Shows, Late Cancellations, and Cancelling at Pickup are all types of “Service Infractions.”

A “No-Show” occurs when you do not show up during the 5-Minute Waiting Period for pickup by RTS Access.

A “Late Cancellation” occurs when you cancel a trip less than 2 hours before the Pickup Period begins.

A “Cancel at Pickup” occurs when you refuse the trip when the bus arrives at the curb or when the Bus Operator arrives at the door (reasonable modification).

2.0 Exceptions

Missing or cancelling a trip due to a reason beyond your control is not a “Service Infraction.” Examples of such situations include if you are suddenly ill, have a medical or family emergency, or must care for an ill family member.

We will not penalize you if we make errors that cause you to miss a trip. Examples of such situations include scheduling your ride incorrectly, arriving at the wrong location for your pickup, leaving before the Pickup Period begins (early departure), or arriving after the Pickup Period.

3.0. Notifying Us About Situations Beyond Your Control

RTS Access will excuse missed trips due to situations that you cannot control. If you have a sudden conflict that will prevent you from taking your trip, please tell us before your pickup. If you are unable to tell us before your pickup, contact us as soon as possible. It is important to contact us before the 15th of the following month so that we do not count the missed trip as a Service Infraction when we review your trip usage.

4.0. Reviewing Your Trip Usage

If you get three Service Infractions in one month, we will review your trip usage. On the 15th day of each month, we will evaluate your usage of all your trips during the previous month.

We expect you to tell us when you miss a trip due to a situation beyond your control. It is your responsibility to tell us about the situation before the 15th of the following month so that we can excuse the missed trip. If you do not, we will count the missed trip as a Service Infraction.

During the review, we will exclude:

1. Excused missed trips; and
2. Individual trips that you cancel two or more hours in advance of the scheduled pick up window; and
3. Subscription trips that you cancel six or more days in advance of the trip date; and
4. Subscription trips that you put “on hold” six or more days in advance of the trip date.

If, after these exclusions, our records indicate that 5% or more of your scheduled trips resulted in Service Infractions, we will apply penalties.

A “Repeated Service Infraction” occurs when you have accumulated three or more Service Infractions and the total is equal to or greater than 5% of all trips scheduled in one month after we apply the exclusions.

5.0. Service Suspensions

The accumulation of Repeated Service Infractions serves as the basis for a Service Suspension.

We will add the number of times you have a Repeated Service Infraction in one calendar year to determine the penalty. The calendar year starts on January 1 and ends on December 31.

The first Repeated Service Infraction in one calendar year will result in a penalty of a Warning Letter.

The second Repeated Service Infraction in one calendar year will result in a penalty of a 5-Day Service Suspension.

The third Repeated Service Infraction in one calendar year will result in a penalty of a 10-Day Service Suspension.

The fourth Repeated Service Infraction in one calendar year will result in a penalty of a 15-Day Service Suspension.

The fifth Repeated Service Infraction in one calendar year will result in a penalty of a 20-Day Service Suspension. Each additional Repeated Service Infraction thereafter in the same calendar year will result in a penalty of a 20-Day Service Suspension.

Any Repeated Service Infraction will also result in the revocation of any Subscription service you have. You can request reinstatement of your Subscription or apply for a new Subscription 60 days after the original revocation date. Some restrictions apply. If your Subscriptions are revoked 3 times during a period of 18 months, you will no longer qualify for Subscription service. See the “Paratransit Trips Subscriptions Policy” for more information.

##### 5.1. Notifying Customers about Service Infractions

When you do not show up for a trip, you will receive an automated phone message informing you of the missed trip. You will also get a written notice of any type of Service Infraction in an accessible format.

You can call 585-654-0647 to discuss the missed trip, to correct errors, to confirm information, or to explain how you missed the trip due to reasons beyond your control. You must call before the 15th of the following month (in practical terms, this means calling before business hours end on the 14th).

##### 5.2. Reminding Customers about the Rules

We will send written reminders in an accessible format about the rules for trips and Service Infractions as necessary. For the first Repeated Service Infraction, we send will send a Warning Letter to you in an accessible format. The letter will explain the rules and explain that we will issue a Service Suspension for the next Repeated Service Infraction. The letter will give a phone number (585-654-0647) that you can call for guidance on how to avoid missing trips.

##### 5.3. Suspending Customers

If you accumulate a second Repeated Service Infraction, we will send a Notice of Suspension Letter in an accessible format. The letter will list the Service Infractions and Repeated Service Infractions for the year, explain the penalty, and explain when the suspension starts and ends. Service Suspensions will start 14 days after the date defined in the letter. We will mail the letter the same day through USPS (or through an appropriate electronic channel for accessibility purposes).

We will include a copy of our rules and procedures (“Paratransit Service Infractions and Suspensions”), the form for appealing a service suspension (“Request to Appeal a Paratransit Service Suspension”) and the process for appeals (“Paratransit Appeals Process and Procedures”). We will provide the materials in an appropriate accessible format.

6.0. Appealing Service Suspensions

You have the right to appeal a service suspension. If you file an appeal before the suspension start date, we will postpone the suspension during the appeal process. We must receive the completed “Request to Appeal a Paratransit Service Suspension” form no later than 14 days from the date in the body of the “Notice of Suspension” letter.

We will provide paratransit service to you while the appeal is pending. We will conduct the appeal according to the RTS Access Paratransit Appeal Process and Procedures.

7.0. Giving Customers Our Procedures

If we revise our procedure for suspensions, we will send the new version to existing customers. We will send the procedure to customers each time we recertify or determine eligibility. The procedure will be available in accessible formats.

8.0. Supporting Details

##### 8.1. Method for Calculating Repeated Service Infractions

Every customer starts the calendar year on January 1 with zero Repeated Service Infractions. Every customer starts the 1st day of a month with zero Service Infractions. On the 15th of each month, we will follow these steps to calculate Service Infractions and any Repeated Service Infractions for each customer during the prior month.

Step 1: Make all the exclusions. We will exclude any trip that you missed due to a reason beyond your control and we excused from being a Service Infraction before the 15th. We will exclude any individual trips that you canceled one or more days ahead of the scheduled pickup date. We will exclude any Subscription trips that you canceled six or more days in advance of the trip date. We will exclude any Subscription trips that you put “on hold” six or more days in advance of the trip date.

Step 2: Add the Service Infractions to get the total number for the prior month.

Step 3: Compare the total. If the total number of Service Infractions is less than three, the trip usage is acceptable and no further calculation is necessary. If the total number of Service Infractions is greater than or equal to three, we will calculate the percentage of missed trips.

Step 4: Calculate the percentage of missed trips. Divide the Service Infractions by the total trips in the prior month. Multiply the total by 100 to calculate the percentage of missed trips. We will calculate the percentage to the second decimal place. We will not round the value up or down.

Step 5: Compare the percentage of missed trips to 5%. If the missed trips are less than 5%, the trip usage is acceptable. If the missed trips are greater than or equal to 5%, you will get a Repeated Service Infraction.

We will track Repeated Service Infractions cumulatively through the entire calendar year until December 31.

##### 8.2. Round Trips

A round trip has two separate scheduled trips: an outgoing trip, and a return trip. If you fail to appear for each trip, cancel both trips on short notice, or cancel the trips at the time of pickup, you will get two Service Infractions. However, we will excuse the Service Infraction when the missed round-trip occurred for reasons beyond your control. Contact 585-654-0647 to explain the situation.

##### 8.3. Repeated Service Infractions in November or December

Repeated Service Infractions that occur in the last two months of the calendar year could result in a service suspension in the next calendar year, even though the tracking mechanism restarts for each calendar year.

End of Paratransit Service Infractions and Suspensions Policy in Exhibit 6.

Paratransit Service Suspensions for Prohibited Conduct Policy

1.0. Rules of Conduct

Rochester-Genesee Regional Transit Authority (“R G R T A”) transit vehicles, facilities and properties are intended to provide public transportation services for the benefit of R G R T A and its subsidiaries, its employees and the public. R G R T A, as referenced throughout this document, refers to the Rochester-Genesee Regional Transportation Authority and its wholly controlled subsidiaries, which include RTS Access as the provider of complementary paratransit for Monroe County. Customer use of RTS Access paratransit service is subject to compliance with R G R T A’s Rules of Conduct for Transit Vehicles, Facilities, and Properties (“Rules”). These Rules are intended to regulate conduct occurring on R G R T A transit vehicles, within or upon R G R T A facilities and properties, including the RTS Transit Center, and in connection with R G R T A’s provision of public transportation services. These Rules apply to all transit conveyances and facilities, including paratransit service.

2.0. Service Suspension due to Prohibited Conduct

On RTS Access, the Americans with Disabilities Act (A D A) permits the suspension of customers from the service who engage in violent, seriously disruptive or illegal conduct towards other customers (passengers), Bus Operators, or RTS Access staff, or R G R T A staff. RTS Access customers are responsible for the conduct of their Personal Care Attendants and/or companions, including children.

3.0. Prohibited Conduct

The following is a partial list of the Rules concerning prohibited conduct. RTS Access customers may be fined or suspended, as applicable (and criminal conduct may lead to arrest), for engaging in any of the following prohibited acts:

1. Refusing to allow proper securement of a wheelchair or mobility device.
2. Using any nicotine, tobacco product (i.e. chewing tobacco) or smoking device (including “e-cigarettes” and “vaping”) except at a designated place. Carrying or holding a lit or smoldering pipe, cigar, or cigarette except at a designated place.
3. Discarding litter other than in designated receptacles. Dumping and/or discarding any materials including but not limited to hazardous substances and automotive fluids. Carrying any flammable liquid, explosive, acid, or other article or material likely to cause harm to others.
4. Producing unreasonable noise, including playing sound-producing devices without earphones, headphones, or an ear receiver to limit sound to individual listeners.
5. Spitting, expectorating, urinating, or defecating, except in the appropriate plumbing fixtures in restroom facilities.
6. Hindering or preventing access by causing unreasonable delays in boarding or alighting; or blocking or partially blocking an aisle or stairway with a package or object; or reclining in more than one seat; or interfering with or seriously disrupting the provision or use of transit services in any way.
7. Disturbing others by engaging in loud, raucous, unruly, aggressive, violent, harmful, or harassing behavior.
8. Destroying, defacing, or otherwise damaging R G R T A property or any signs, notices, or advertisements on transit property.
9. Consuming an alcoholic beverage or having possession of an open container containing an alcoholic beverage.
10. Carrying or storing any firearm, shotgun, rifle, or other dangerous weapon or article.
11. Throwing any object at R G R T A transit vehicles, facilities, and properties; or at any person therein; or within R G R T A transit vehicles, facilities, and properties; or out of any door or window of any R G R T A transit vehicle.
12. Allowing any animal to occupy a bus seat (unless required by applicable law in the case of a service animal); or run at large; or block an aisle or exit; or unreasonably disturb others; or leave waste matter; or interfere with transit-related activities.
13. Eating on R G R T A transit vehicles or in prohibited areas unless required by applicable law.
14. Not wearing shoes and/or clothing, such as shirt, pants, dresses, etc.
15. Distributing, selling, or offering for sale or donation any written or printed material, including books and pamphlets.
16. Committing any act which tends to create or incite, or creates or incites, an immediate breach of peace, including, but not limited to fighting; or obscene language and noisy or boisterous conduct tending to cause a breach of the peace; or personally abusive epithets, or words or language of an offensive, disgusting or insulting nature, which when addressed to the ordinary citizen are, as a matter of common knowledge, inherently likely to provoke a violent reaction of fear, anger or apprehension.
17. Engaging in sexual activity with oneself or others.
18. Entering R G R T A transit vehicles, facilities, and properties when lacking the ability—because of illness, intoxication, or medications—to care for oneself.
19. Engaging in any harassment, defined as acts occurring within or about R G R T A facilities or vehicles: (1) when a person intentionally and repeatedly harasses another person by following such person in or about a public place or places or by engaging in a course of conduct or by repeatedly committing acts which places such person in reasonable fear of physical injury; (2) when a person, with intent to harass, annoy, or alarm another person (a) strikes, shoves, kicks or otherwise subjects another person to physical contact, or attempts to or threatens to do the same; or (b) follows a person about in a public place or places; or (c)engages in a course of conduct or repeatedly commits acts which alarm or seriously annoy such other person and which serve no legitimate purpose.

4.0. Enforcement

RTS Access reserves the right to suspend customers who engage in violations of the Rules of Conduct for Transit Vehicles, Facilities, and Properties to the extent permitted by A D A and/or to issue summonses when such conduct is observed by a police officer or other officer duly designated to issue summonses.

5.0. Appeal Process

RTS Access shall enforce, exclude from service, and provide notice of exclusion (suspension) in accordance with the procedures identified in “Article IV. Enforcement” of the Rules of Conduct for Transit Vehicles, Facilities, and Properties (“Rules”). The appeals process shall be provided to any person excluded (suspended from service) for a period of 31 days or more. The Appeal Procedure is provided in the Rules and shall apply. RTS Access will provide paratransit service to the appellant during the appeal process. Except for suspensions for violent or seriously disruptive conduct, before suspending service, RTS Access will notify the customer in writing. The notice will identify the specific conduct leading to the suspension and the duration of the suspension. The customer will have an opportunity to be heard and to present information and arguments as to why the suspension should not be imposed. Following this process, RTS Access will notify the customer in writing of the final decision and the reasons for it. In the case of suspensions for violent or seriously disruptive conduct during a paratransit trip, the suspension will take effect immediately, but the customer will be entitled to a post-suspension appeal. The same appeal procedures noted above will be followed.

End of Paratransit Service Suspensions for Prohibited Conduct Policy in Exhibit 6.

Paratransit Appeal Process and Procedures

If a customer appeals a notice of service suspension, RTS Access will continue to provide paratransit service as usual to the customer while the appeal is pending.

If an applicant appeals the eligibility decision or the type of eligibility granted, RTS will **NOT** provide paratransit service during the process. After completing the process, RTS Access will have 30 days to issue the decision. However, if RTS Access takes longer than 30 days to issue the appeal decision, it must provide paratransit service to the appellant until it issues the decision regarding the eligibility appeal.

Please refer to Exhibit 11 in Section 3 for the appeal process and procedures.

Text of the Request to Appeal a Service Suspension form

Please complete this form if you would like to appeal our determination regarding your RTS Access service suspension due to Repeated Service Infractions.

Return the completed form to the Paratransit Appeals Coordinator located at 1372 East Main Street, Rochester NY 14609. The Coordinator must receive your request no later than 14 days from the date in the body of the suspension notice letter.

If the Coordinator receives your request by the deadline, the Coordinator will contact you and arrange for your appeal to go before the Paratransit Appeals Committee. If the Coordinator receives your request after the deadline, the original determination remains in effect.

Provide your name, phone number, and Client ID Number.

Customer Name [field for name]

Phone Number [field for phone number]

Client ID Number [field for ID]

Select one of the following choices for your appeal participation.

[Checkbox 1]: I choose to submit additional information for the Paratransit Appeals Committee to consider, but do not want to appeal in person. (Please send all information that you would like the Paratransit Appeals Committee to consider along with this form.)

OR

[Checkbox 2]: I choose to appeal in person.

(If you choose this option, we will contact you to schedule a mutually agreeable day and time for the appeal hearing. You may bring additional information to the hearing and can attend with others who are able to provide information on your behalf. If you have a disability that requires a Reasonable Accommodation in order for you to participate in the appeal hearing, please request the accommodation in advance from RTS Access.)

The suspension notice I am appealing is dated [field for the date of the notice].

Signature [field for signature]

Date [field for date of signature]

Mail or deliver the completed form to 1327 East Main Street, Rochester NY 14609, Attention: Paratransit Coordinator.

End of the text in the Request to Appeal a Service Suspension form in Exhibit 6.

End of Exhibit 6.

Exhibit 7: Complaints

Exhibit 7 contains the Reasonable Modification Complaint form and the A D A Complaint form.

Reasonable Modification Complaint Form

If assistance is needed in another language, please call 585.288.1700. Si necesita información en otro idioma, por favor llame al 585-288-1700.

Section 1

Name:

Address:

Telephone (Home):

Telephone (Work):

E-mail Address:

RTS Service Provider (choose one): RTS Monroe | RTS Access | RTS Genesee | RTS Livingston | RTS Ontario | RTS Orleans | RTS Seneca | RTS Wayne | RTS Wyoming

Accessible Format Requirements (choose one if necessary, otherwise leave blank): Large Print | TDD | Audio | Other:

Section 2

Are you filing this complaint on your own behalf? Yes | No

If you answer Yes, go to Section 3. If you answer No, complete Section 2.

Supply the name of the third party and your relationship to the third party.

Name:

Relationship:

Why are you filing a complaint for a third party?:

Did you obtain the permission of the aggrieved party to file on his or her behalf? Yes | No

Section 3

Date you requested the modification (Month, Day, Year):

How did you make the request?

Explain why the modification is necessary for you to use the RTS service. If you need more space, please attach a separate sheet.

Identify the period of time for which you need the modification:

Signature and Date Required

Signature:

Date:

Please submit this form in person to the address below, or mail this form to

R G R T A Legal Affairs Department

1372 East Main Street

Rochester NY 14609

End of Reasonable Modification Complaint Form in Exhibit 7.

A D A Complaint Form

If assistance is needed in another language, please call 585.288.1700. Si necesita información en otro idioma, por favor llame al 585-288-1700.

Section 1

Name:

Address:

Telephone (Home):

Telephone (Work):

E-mail Address:

Accessible Format Requirements (choose one if necessary, otherwise leave blank): Large Print | TDD | Audio | Other:

Section 2

Are you filing this complaint on your own behalf? Yes | No

If you answer Yes, go to Section 3. If you answer No, complete Section 2.

Supply the name of the third party and your relationship to the third party.

Name:

Relationship:

Why are you filing a complaint for a third party?:

Did you obtain the permission of the aggrieved party to file on his or her behalf? Yes | No

Section 3

Date of alleged discrimination based on disability (Month, Day, Year):

Time of alleged discrimination based on disability:

Transit Service (choose one): RTS Monroe | RTS Access | RTS Genesee | RTS Livingston | RTS Ontario | RTS Orleans | RTS Seneca | RTS Wayne | RTS Wyoming

Bus Number:

Route Name or Number:

Direction of Travel:

Location of Incident:

Mobility Aid Used (if any):

Explain what happened; why you believe you were discriminated against; and describe all persons who were involved. If you need more space, please attach a separate sheet.

Provide the name and contact information of the persons who discriminated against you (if known). Provide the names and contact information of any witnesses. If you need more space, please attach a separate sheet.

Section 4

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal agency or State court?: Yes | No

If you answer Yes, please select all that apply:

Federal Court | State Agency | State Court | Local Agency

Please provide information about a contact person at the agency or court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Signature and Date Required

Signature:

Date:

Please submit this form in person to the address below, or mail this form to

R G R T A Legal Affairs Department

1372 East Main Street

Rochester NY 14609

End of Reasonable A D A Complaint Form in Exhibit 7.

End of Exhibit 7.

Exhibit 8: Timely Service

Exhibit 8 contains a sample of the text in the RTS Access Customer Satisfaction Survey.

On a scale of 1-5 where 1 means “Very Dissatisfied” and 5 means “Very Satisfied” please rate your overall level of satisfaction with RTS Access’s performance on the following elements of bus service:

Our Performance

#1. Overall Performance (1, 2, 3, 4, 5)

#2. Bus arrives On-Time (1, 2, 3, 4, 5)

#3. Schedulers are courteous and helpful (1, 2, 3, 4, 5)

#4. Drivers are courteous and helpful (1, 2, 3, 4, 5)

#5. Ease of buying passes (1, 2, 3, 4, 5)

#6. Ease of paying the fare (1, 2, 3, 4, 5)

#7. Ease of contacting RTS Access (1, 2, 3, 4, 5)

Our Cleanliness

#1. Overall Cleanliness (1, 2, 3, 4, 5)

#2. Seats are clean (1, 2, 3, 4, 5)

#3. Windows are clean (1, 2, 3, 4, 5)

#4. Floors are clean (1, 2, 3, 4, 5)

#5. Exterior is clean (1, 2, 3, 4, 5)

#6. Bus smells clean (1, 2, 3, 4, 5)

How often do you ride RTS Access per week?

Less than 1 Day, or 1 to 2 Days, or 3 to 4 Days, or 5 or more Days

How long have you been using RTS Access?

Less than 3 months; or 3 to 6 months; or 6 months to 1 year; or 1 to 5 years, or 5 or more years

Which of the following is most important to you?

Arrives on time

Bus Comfort

Driver Courtesy

Easy to get information from RTS Access

Safety and Security

Clean Bus

Scheduling

Is there anything else you would like to tell us about riding RTS Access? [field for writing comments]

Please return the form to your driver

End of the sample of the RTS Access Customer Satisfaction Survey in Exhibit 8.

End of Exhibit 8.

Exhibit 9: No Strand Policy

Exhibit 9 contains the full No Strand policy. The policy establishes a Final Pickup Period based on the comparable schedule for fixed route service. The policy applies only to the return ride of a round-trip scheduled with RTS Access.

Paratransit “No Strand” Policy

1.0. Policy

RTS Access understands that circumstances, such as a medical appointment taking longer than expected, may prevent you from showing up during the 5-Minute Waiting Period for your return trip. If a customer fails to appear for boarding within the scheduled Pickup Period for a return trip, RTS Access, at the request of the customer, will attempt, with its available resources, to schedule a return trip so that the customer is not stranded. The Policy applies only to the return ride of a round-trip scheduled with RTS Access during regular service hours.

1.1. Definitions

A “Final Pickup Period” is the latest available pickup period for a return trip. The final pickup period is based on the comparable schedule for fixed route service, takes into account the likely travel time for the requested trips and allows RTS Access to finish transporting customers to their destinations no later than the latest comparable fixed route drop-off. For example, if the latest drop-off on a particular RTS fixed route is 10:30 PM, RTS Access could establish a return-trip Final Pickup Period of 9:50 PM to allow the RTS Access Bus Operator to complete the return trips by 10:30 PM.

A “Pickup Period” is the 20-minute window of time scheduled for the bus to arrive for your pickup. After the Pickup Period begins, the Bus Operator will wait 5 minutes for you to show up for the scheduled ride.

The “5-Minute Waiting Period” is the amount of time an RTS Access Bus Operator must wait for you to appear for the scheduled pickup. The waiting period cannot start before the start of the Pickup Period.

A “No-Show” is a service infraction that occurs when you do not show up during the 5-Minute Waiting Period for pickup by RTS Access.

2.0. Details

If you miss your originally scheduled return trip, and request another pickup, we will do our best to schedule a return trip. It is important to know the following:

1. We will only schedule trips during regular service hours; and

2. You may need to wait longer than you would normally wait for a pickup.

2.1. Restrictions

This Policy does not apply for customers who fail to show up for a return trip scheduled at the Final Pickup Period, or when customers book a one-way trip, or for customers who request to disembark from the vehicle before reaching their scheduled destination.

2.2. Same-day Service

Another option is to call 585-224-8330, Option 3, to request a Same-day trip. If we have availability, we will schedule the ride. You may need to wait longer than you would normally wait for a pickup and you must pay the premium fare of $8.00 when you board. The fare for Same-day service is $6.00 in addition to the $2.00 base fare. If the Same-day trip is for a destination in the supplemental service area, add $6.00 to the total fare.

End of Paratransit “No Strand” Policy in Exhibit 9.

End of Exhibit 9.

Exhibit 10: Time-Line of Implementation

Exhibit 10 contains copies of R G R T A Resolutions from 1987 to 2014 regarding the adoption of a Paratransit Plan and the implementation of A D A complementary paratransit service.

R-GRTA RESOLUTION NO. 13 - 1987 ADOPTING A SERVICE PLAN FOR THE PROVISION OF ACCESSIBLE TRANSPORTATION FOR THE TRANSPORTATION HANDICAPPED

WHEREAS, the Proposed Service Plan for accessible transportation for the transportation handicapped represents a significant expansion of the Rochester-Genesee Regional Transportation

Authority's (the "Authority") continuing commitment to transportation handicapped citizens in the metropolitan Rochester, New York area, an WHEREAS, the Plan is the result of nearly 10 months of careful, detailed planning and analysis of current reports, and of alternatives for further increasing the level of accessible public transportation provided by the Authority, and has been formulated with the full cooperation of the Authority's advisory board (T.H.E. Committee), and WHEREAS, the Proposed Service Plan has been made available for all required public comment, both in written form for a 60-day period, and at a Public Hearing, and WHEREAS, the Commissioners and staff of the Authority have re-viewed all comments received on the Proposed Service Plan, both written and oral, NOW, THEREFORE, BE IT RESOLVED that we do hereby adopt the Final Service Plan as presented, and direct that it be submitted to the Urban Mass Transportation Administration of the U. S. Department of Transportation for review. CERTIFICATION The undersigned hereby certifies that the above is an excerpt from the Minutes of a Special Meeting of the Rochester-Genesee Regional Transportation Authority, which was held on June 17, 1987, at 1372 East Main Street, Rochester, New York, and that the Resolution is still in full force and effect. Signature of Harold A. Shay, Vice Chairman Dated: June 17, 1987 Rochester, New York.

R-GRTA NO. 15 - 1988 RESOLUTION REAFFIRMING R-GRTA POLICY FOR THE PROVISION OF ACCESSIBLE TRANSPORTATION FOR THE TRANSPORTATION HANDICAPPED

WHEREAS, the Rochester-Genesee Regional Transportation Authority (the "Authority") has a strong commitment to the development of public transit policies and services to meet the transportation requirements of mobility-impaired residents; and WHEREAS, on June 17, 1987, the Authority adopted a five-year service plan for accessible transportation in compliance with 504 regulations issued by the Urban Mass Transportation Administration (UMTA) representing a significant expansion of the services provided; and WHEREAS, the plan for expanded Lift Line curb-to-curb service was the result of several months of planning and analysis of alternatives and was formulated with the full cooperation of the Authority's Advisory Board (T.H.E. Committee) composed of elderly and disabled riders, social service agency representatives and special transportation providers; and WHEREAS, the plan was made available for all required comments, both in written form for a 60-day period, and at a public hearing, and all written and oral comments received were reviewed; and WHEREAS, the Authority has consistently met and exceeded all laws, regulations and directives of the federal and state governments in pursuit of effective mobility service for those with transportation handicaps; and WHEREAS, UMTA regulations provide for local determination in the adoption of a plan to meet the special mobility requirements of the law; and WHEREAS, the American Public Transit Association has reaffirmed its position that there be local determination in meeting all governmental requirements for accessible service. NOW, THEREFORE, BE IT RESOLVED that the Authority hereby reaffirms support for the plan for accessible service adopted on June 17, 1987; and BE IT FURTHER RESOLVED that the Authority reaffirms its willingness to operate accessible fixed-route buses when, and if, external financial support is provided exclusively for this purpose or when a determination is made by the federal and/or state governments that accessible fixed-route service is mandated by the laws applicable to transit service for the transportation handicapped. CERTIFICATION The undersigned hereby certifies that the above is an excerpt from the Minutes of a Regular Meeting of the Rochester-Genesee Regional Transportation Authority, which was held on November 2, 1988, at 1372 East Main Street, Rochester, New York, and that the Resolution is still in full force and effect. Signature of Andrew F. Caverly, Chairman Dated: November 2, 1988 Rochester, New York.

R-GRTA NO. 2 - 1992 ADOPTING AN ACCESSTPLP TRANSPORTATION SERVICE PLAN

WHEREAS, the federal Americans With Disabilities Act (A D A) requires submission to the Federal Transit Administration of an Accessible Transportation Service Plan for fixed-route service and complementary para-transit service; and WHEREAS, an Accessible Transportation Service Plan has been developed for Regional Transit Service, Inc. and the Wayne Area Transportation Service, Inc. in conjunction with the Accessible Transportation Committee appointed by the governor under New York State law, the Authority's long-standing advisory committee, T.H.E., the WATS Advisory Committee, open communication with other disability rights organizations and public hearings; and WHEREAS, the Accessible Transportation Service Plan was made available for public comment, both in written form and at public hearings; and WHEREAS, the Commissioners and staff of the Authority have reviewed all comments received on the Accessible Transportation Service Plan, both written and oral. NOW, THEREFORE, BE IT RESOLVED that the Commissioners of the Rochester-Genesee Regional Transportation Authority do hereby adopt the Accessible Transportation Service Plan, and direct that it be submitted to the Federal Transit Administration. CERTIFICATION The undersigned hereby certifies that the above is an excerpt from the Minutes of a Special Meeting of the Rochester-Genesee Regional Transportation Authority, which was held on January 24, 1992, at 1372 East Main Street, Rochester, New York, and that the Resolution is still in full force and effect. Signature of Andrew F. Caverly, Chairman Dated: January 24, 1992 Rochester, New York.

R-GRTA NO. 1- 1993 RESOLUTION APPROVING THE 1993 PARATRANSIT PLAN UPDATE

WHEREAS, the Rochester-Genesee Regional Transportation Authority adopted an A D A para-transit implementation plan in January, 1992; and WHEREAS, this plan has received the approval of the Federal Transit Ad-ministration (FTA); and WHEREAS, the FTA requires submission of an annual update to the plan documenting the results of A D A implementation and proposed activities to be undertaken during 1993 in an effort to achieve full compliance; and WHEREAS, the 1993 A D A Para-Transit Plan Update has been developed for Regional Transit Service, Inc. and the Wayne Area Transportation Service, Inc. in conjunction with the Accessible Transportation Committee appointed by the Governor under New York State law; and WHEREAS, the 1993 Para-Transit Plan Update was made available for Public comment at a public meeting held on January 12, 1993; and WHEREAS, the Commissioners and staff of the Authority have reviewed all comments received on the 1993 Para-Transit Plan Update. NOW, THEREFORE, BE IT RESOLVED that the Commissioners of the Rochester-Genesee Regional Transportation Authority do hereby approve the 1993 A D A Para-Transit Plan Update and direct that it be submitted to the Federal Transit Administration. CERTIFICATION The undersigned hereby certifies that the above is an excerpt from the Minutes of a Special Meeting of the Authority, which was held on January 20, 1993, at 1372 East Main Street, Rochester, New York, and that the Resolution is still in full force and effect. Signature of Harold A. Shay, Vice Chairman Dated: January 20, 1993 Rochester, New York.

R-GRTA NO. 1 - 1994 RESOLUTION APPROVING THE 1994 A D A PLAN UPDATE

WHEREAS, the Rochester-Genesee Regional Transportation Authority adopted an A D A Para-transit implementation plan in January; 1992; and WHEREAS, this plan received the approval of the Federal Transit Administration (FTA); and WHEREAS, the FTA requires submission of an annual update to the plan documenting the results of A D A implementation and proposed activities to be undertaken during 1994 in an effort to achieve full compliance; and WHEREAS, the 1994 A D A Plan Update was made available for public comment at a public meeting held on December 17, 1993; and WHEREAS, the Commissioners and staff of the Authority have reviewed all comments received on the 1994 A D A Plan Update. NOW, THEREFORE, BE IT RESOLVED that the Commissioners of the Rochester-Genesee Regional Transportation Authority do hereby approve the 1994 A D A Plan Update and direct that it be submitted to the Federal Transit Administration. CERTIFICATION

The undersigned hereby certifies that the above is an excerpt from the Minutes of a Regular Meeting of the Rochester Genesee Regional Transportation Authority, which was held on January 12, 1994, at 1372 East Main Street, Rochester, New York, and that the Resolution is still in full force and effect. Signature of Andrew F. Caverly, Chairman Dated: January 12, 1994 Rochester, New York.

R-GRTA NO. 2 - 1995 RESOLUTION APPROVING THE 1995 A D A PARATRANSIT PLAN UPDATE

WHEREAS, the Rochester-Genesee Regional Transportation Authority (the "Authority") adopted an A D A paratransit implementation plan in January, 1992; and WHEREAS, this plan received the approval of the Federal Transit Administration (FTA); WHEREAS, the FTA requires submission the plan documenting the results of proposed activities to be undertaken during 1995 in an effort to achieve full compliance; and WHEREAS, the 1995 A D A Paratransit Plan Update was made available for public comment at a public meeting held on January 18, 1995; and WHEREAS, the Commissioners and staff of the Authority have reviewed all comments received on the 1995 A D A Paratransit Plan Update. NOW, THEREFORE, BE IT RESOLVED that the Commissioners of the Rochester-Genesee Regional Transportation Authority do hereby approve the 1995 A D A Paratransit Plan Update and direct that it be submitted to the Federal Transit Administration. CERTIFICATION The undersigned hereby certifies that the above is an excerpt from the Minutes of a Regular Meeting of the Rochester-Genesee Regional Transportation Authority, which was held on January 25, 1995, at 1372 East Main Street, Rochester, New York, and that the Resolution is still in full force and effect. Signature of Thomas F. Toole, Acting Chairman Dated: January 25, 1995 Rochester, New York.

R-GRTA NO. 3 - 1996 RESOLUTION APPROVING THE 1996 A D A PARATRANSIT PLAN UPDATE

WHEREAS, the Rochester-Genesee Regional Transportation Authority (the "Authority") adopted an A D A paratransit implementation plan in January, 1992; and WHEREAS, this plan received the approval of the Federal Transit Administration (FTA); and WHEREAS, the FTA requires submission of an annual update to the plan documenting the results of A D A implementation and proposed activities to be undertaken during 1996 in an effort to achieve full compliance; and WHEREAS, the 1996 A D A Paratransit Plan Update was made available for public comment at a public meeting held on January 4, 1996; and WHEREAS, the Commissioners and staff of the Authority have reviewed all comments received on the 1996 A D A Paratransit Plan Update. NOW, THEREFORE, BE IT RESOLVED that the Commissioners of the Rochester-Genesee Regional Transportation Authority do hereby approve the 1996 A D A Paratransit Plan Update and direct that it be submitted to the Federal Transit Administration. CERTIFICATION The undersigned hereby certifies that the above is an excerpt from the Minutes of a Regular Meeting of the Rochester-Genesee Regional Transportation Authority, which was held on January 10, 1995, at 1372 East Main Street, Rochester, New York, and that the Resolution is still in full force and effect. Signature of Andrew F. Caverly, Chairman Dated: January 10, 1996 Rochester, New York.

R G R T A Board of Commissioners Agenda Item Cover Sheet Board Meeting Date September 11, 2014

Presenter: Daniele Coll-Gonzalez

Subject: Resolution Authorizing Changes to the Paratransit Plan

Background: A Paratransit plan details how services are delivered to comply with the Americans with Disabilities Act (A D A) service criteria and is filed with the FTA. Anytime we wish to update the plan, we must:

1. Make proposed changes available for public review
2. Conduct a Public Hearing
3. Receive approval from the R G R T A Board of Commissioners
4. Submit the Final Proposed Paratransit Plan, as approved by the Board of Commissioners, to the FTA

Proposed changes to the Paratransit Plan include: Revisions to the application/certification process; Streamlining subscription service requirements; Changes to published fare structure; and Updating the service area. A public hearing to review the proposed changes was held on July 19, 2014.

Financial Impact: No impact to current operating budget.

Recommendation: That the plan be approved and adopted in the form presented to the Board of Commissioners.

RESOLUTION: R G R T A 55-2014 Authorizing Changes to the Paratransit Plan

WHEREAS, the Rochester Genesee Regional Transportation Authority (the "Authority") seeks approval to adopt the proposed changes to the Paratransit Plan in compliance with FTA regulations; and WHEREAS, effective October 1, 2014: The Paratransit service area in Monroe County will be 3/4 mile from all qualifying feed route service; The Supplemental Paratransit service area will be 1 and 1/2 miles from the Paratransit service area; New applicants who are not eligible for paratransit service will pay the standard RTS fare when riding RTS; Scheduling hours will be consistent with the hours of the administrative offices of each subsidiary and to accommodate next day scheduling. WHEREAS, the Authority held a public hearing on July 19, 2014 for the purpose receiving public comments with respect to the proposal; and WHEREAS, 15 members of the public submitted comments with respect to the proposal; and copies of those comments along with management's responses to the comments, have been provided to the Board; and WHEREAS, the Board has considered such public comments; and WHEREAS, the Board has concluded that the proposed changes to the Paratransit Plan are in the best interest of the Authority and the public. NOW THEREFORE BE IT RESOLVED, that the R G R T A Board Roles and Responsibilities is hereby approved and adopted in the form annexed to this Resolution. CERTIFICATION The undersigned hereby certifies that the above is an excerpt from the Minutes of a Regular Meeting of the Rochester Genesee Regional Transportation Authority, which was held on September 11, 2014 and that the Resolution is still in full force and effect. Signature of James H. Redmond, Chairman Dated: September 11, 2014 Rochester, New York.

When a Resolution is available authorizing the changes to the Paratransit Plan for Summer 2020, the resolution will be included in this exhibit.

End of Exhibit 10.

End of Exhibits for Section 2.

# Section 3: Process for Determining A D A Paratransit Eligibility

This section describes the processes used to certify individuals with disabilities as A D A paratransit eligible.

1. RTS Access paratransit service will be available for use by any of the following persons:
2. Applicants certified as eligible through the application process (“customers”);
3. Eligible visitors from outside the region (for up to a total of 21 days in a 365-day period);
4. Applicants whose complete application was not processed within 21 days of receipt (temporarily until an eligibility decision is made); and
5. Appellants whose appeal decision is not issued within 30 days of the completion of the appeals process (temporarily until an appeals decision is made).

RTS Access will apply the following policies and procedures for determining A D A Paratransit Eligibility:

1. Paratransit Eligibility (policy)
2. Application for Paratransit Eligibility Certification
3. All-Trip Eligibility Renewal Form
4. Paratransit Appeal Process and Procedures
5. Request to Appeal a Paratransit Eligibility Decision

Exhibit 11 of this Plan contains the eligibility policies and procedures.

RTS Access will make the materials available in an accessible format upon request. Assistance can be requested by contacting Customer Service at (585) 288-1700 or using the Contact Us online form <http://rts.force.com/RTSContactUs>.

RTS Access will post the Application for Paratransit Eligibility Certification online at <https://www.myrts.com/Access> and distribute the most current application to agencies. The public can offer feedback at any time about the application or application process by contacting Customer Service at (585) 288-1700 or using the Contact Us online form <http://rts.force.com/RTSContactUs>.

Applicants certified as eligible for paratransit service will receive written notification of their eligibility type as well as instructions for obtaining an RTS Access Photo ID Smartcard.

RTS Access will use its Customer Relationship Management system to create a record of the customer and automate subsequent printed reports, recertification letters, and smartcards. This automation will reduce errors and increase the efficiency of processing materials related to eligibility.

RTS Access will expect certified eligible customers to provide updated information to RTS Access. This includes changes to phone numbers, email addresses, mailing addresses, or changes to a disability or condition. It is vital for customers to keep such information current to ensure their safety and to ensure RTS Access has the ability to update responders, agencies, caretakers, or family members in the event of an emergency. RTS Access will use mailing addresses to issue a variety of important information in writing, such as eligibility decisions, recertification notices, and warning letters. It is the responsibility of the customer to provide RTS Access with updated contact information; failure to do so could affect eligibility status or service.

End of Section 3.

Exhibit for Section 3

Section 3 includes Exhibit 11: Eligibility Certification.

Exhibit 11: Eligibility Certification

The exhibit includes the full policy on Paratransit Eligibility, the Application for Paratransit Eligibility Certification, Renewal for All-Trip Paratransit Eligibility Certification, Paratransit Appeal Process and Procedures, Request to Appeal an Eligibility Decision, and Process Maps for Eligibility Certification and Appeals.

Paratransit Eligibility Policy

1.0. Policy

R G R T A provides complementary paratransit services in Monroe County through RTS Access. RTS Access provides transportation to people who are certified as eligible for it in accordance with the Americans with Disabilities Act of 1990 (A D A). This document describes the application process, eligibility categories, appeal process, and recertification requirements for A D A paratransit-eligible passengers (“customers”) and visitors.

RTS Access paratransit service will be available for use by any of the following persons:

1. Applicants certified as eligible through the application process (“customers”);
2. Eligible visitors from outside the region (for up to a total of 21 days in a 365 day period);
3. Applicants whose complete application was not processed within 21 days of receipt (temporarily until an eligibility decision is made); and
4. Appellants whose appeal decision is not issued within 30 days of the completion of the appeals process (temporarily until an appeals decision is made).

2.0. Criteria for Eligibility

In accordance with the A D A and its regulations, Section 37.123(e), a person would be considered A D A eligible for paratransit service under these circumstances:

1. The person with a disability has a specific impairment related condition that prevents travel to a boarding location or from a disembarking location on the fixed route system.
2. The person with a disability is unable to board, ride, or disembark from any vehicle in the fixed route system that is accessible to individuals with disabilities without the assistance of another individual (excluding the vehicle’s operator).
3. The person with a disability could utilize an accessible vehicle but such a vehicle does not operate on the route he/she wishes to travel; or, one or more bus stops or transit facilities on the route are not accessible.

The criteria provide guidance for RTS Access to use during the eligibility process. Anyone who believes they may be eligible for paratransit must apply and participate in an interview and a functional assessment if necessary. After the application process is complete, RTS Access will issue a determination of eligible or ineligible. If you are certified eligible, you will also be assigned to one of three eligibility categories.

Your diagnosis or use of a mobility aid will not automatically qualify you as paratransit eligible. Decisions on paratransit eligibility will consider the following:

Whether you are functionally unable to travel on a fixed route system due to your disability; and

The level of effort and risk involved for you during such travel.

3.0. Geographic Area

A customer can use RTS Access in the same geographic area that RTS fixed route covers during the same general hours of service. Although applicants are not required to live within the RTS Access paratransit service area to be certified as paratransit eligible, RTS Access will provide paratransit service only to points within its service area. It will be the responsibility of the customer to arrange for alternate transportation to and from points within the paratransit service area. Prior to applying for paratransit eligibility, people can find out whether their anticipated travel is within the RTS paratransit service area by dialing 585-224-8330, Option #3, Monday through Friday during business hours. Note: RTS Access buses cannot back up from driveways or from dead-end streets without cul-de-sacs (which are circular areas for turning around).

4.0. Eligibility Certification Types

The eligibility certifications are All-Trip, Conditional, and Temporary.

4.1. All-Trip

With All-Trip Certification, you are eligible to use A D A paratransit for all trips within the service area served by fixed route and any areas served by paratransit supplemental service. The basis for an All-Trip determination is as follows. The condition preventing you from functionally using fixed route in any capacity is unlikely to improve and there is strong evidence that your inability to use fixed route will not change. Your certification will expire every three years and you will be required to renew it. We will have you fill out a simple form to make sure we have accurate information about you, such as your phone number, address, designees, and travel needs.

4.2. Conditional

With Conditional Certification, you can use A D A paratransit for some trips, but not others, depending on your disabilities, the availability of accessible fixed-route service, and the barriers to reaching it.

You can use paratransit under the conditions where your disability prevents you from using fixed route service. As a result of your application or recertification and functional assessment, we determined that you are able to use fixed route bus service under certain conditions and are eligible to use paratransit when you are not able to use fixed route buses. We will provide you with a description of the conditions under which you can use paratransit as well as the basis for our determination.

Your eligibility for paratransit depends on the presence of barriers that can affect travel. Your functional ability to use fixed route service may increase or decrease based on specific, measurable conditions. For example, weather conditions (temperature, precipitation, wind speeds, visibility), seasonal conditions (snow accumulation, pollen level, periods of extreme cold or heat, hours of daylight), or the characteristics of the location (construction zone, level of incline, number of curb cuts, availability and condition of paved areas, ratio of ramps to stairs, and so on).

Your functional ability to use fixed route depends on conditions that may or may not change over time. Routine recertification allows the A D A Certification Coordinator to determine current conditions and identify situations that impede or facilitate travel on fixed route. A situation may improve or change to the degree that a previous barrier to using fixed route no longer exists or affects functional ability. Other factors include, but are not limited to, acquiring orientation and mobility skills, learning how to navigate the RTS system through travel training, improvements in your condition, and environmental improvements.

Recertification occurs every three years. During recertification, you need to provide any new contact information, an updated self-assessment, and updated information from your health care provider. We will perform a functional assessment and issue a new determination.

If you feel that your functional abilities have changed and the conditions established no longer reflect your abilities, you do not need to wait for recertification. You can submit new documentation or reapply at any time during your current term of eligibility.

4.3. Temporary

With Temporary Certification, you are eligible to use A D A paratransit for some or all trips for a limited period, usually defined in months. The disability that prevents you from using fixed route service (or another form of transportation) will improve within a set period or your functional ability to use fixed route will improve within a set period. The certification expires after a specific period that we define. If you are functionally unable to use fixed route or other modes of transportation after the certification expires and you want to use paratransit for an additional period, you must recertify. During recertification, you need to provide any new contact information, an updated self-assessment, and updated information from your health care provider. We will perform a functional assessment and issue a new determination.

5.0. Applications, Interviews, and Assessments

A completed application will be required for assessing eligibility but does not guarantee certification of eligibility. A determination will not be made until the application is complete. It is the applicant’s responsibility to submit a completed application to RTS Access.

In addition to a complete application, RTS Access may require an interview and/or a functional assessment to make an accurate eligibility decision. The determination will result after consideration of all information provided in the complete application, including information from a licensed health care provider authorized to release such information, and information disclosed during any interviews or assessments.

Applicants cannot use RTS Access during the application process. However, RTS Access will grant temporary use of paratransit service to the applicant should it require longer than 21 days to reach a determination.

6.0. Initial Determination

Within 21 days of receiving a fully completed application, RTS Access will issue a written letter explaining the eligibility decision (eligible or ineligible) as long as an interview or functional assessment is not required.

If an interview or a functional assessment is required, RTS Access shall schedule the appointments in advance with the applicant. Within 21 days of the completion of the required interview or functional assessment, RTS Access will issue a written letter explaining the eligibility decision (eligible or ineligible).

If the applicant fails to appear for the appointment, the 21-day “clock” stops and does not start until the date the applicant attends the interview or assessment.

All written letters will be provided in an appropriate accessible format.

6.1. Eligible

If determined eligible, you will receive a letter confirming the certification granted, a certification card, and appeal procedures. The certification card shall include your name, your photo, and the contact information for the RTS Access A D A Certification Coordinator. If you indicated on your application that you may travel with a personal care attendant, the acronym “PCA” is also printed on the card. You will also receive information about your rights under Title VI.

RTS Access will expect eligible customers to show photo ID to the Operator upon boarding the paratransit vehicle. If you do not yet have a photo ID card issued by RTS Access, you may use another recent photo ID (such as a non-driver ID card, photo driver’s license, or passport) during the interim.

6.2. Ineligible

If determined ineligible, you will receive a letter explaining the decision and will receive written appeal procedures. The materials will be provided in an appropriate accessible format.

7.0. Recertification

You are responsible for recertifying by no later than the expiration date to continue use of the paratransit service. RTS Access will mail written instructions and a recertification application three months before eligibility certifications expire. It is your responsibility to provide RTS Access with current mailing and contact information to ensure receipt of such materials. Recertification involves submitting the required written materials and may include a functional assessment.

Note: A prior eligibility certification does not guarantee continued eligibility.

You must complete the recertification process before or by no later than the expiration date. RTS Access will issue a new certification card to eligible customers. RTS Access may deny service to anyone with expired eligibility certification.

8.0. Appeals

An eligibility decision may be appealed in accordance with the paratransit appeal process and procedures. The procedure is provided with the determination letter (eligible or ineligible). Appellants must file the appeal within 60 calendar days from the date of the determination letter. The appellant shall be given an opportunity to present his or her grounds for appeal at a hearing before a Paratransit Appeals Committee. The appellant may choose to have a representative in attendance at the hearing. The Committee will issue a final written decision on an appeal within 30 calendar days after the appeals process is complete.

RTS Access will NOT provide paratransit service to an appellant who is ineligible for service during the appeal process.

If RTS Access does not issue the eligibility appeal decision within 30 days, RTS Access must provide paratransit service to the appellant until it issues the decision. More details about the appeal process are in the Paratransit Appeal Process and Procedures.

9.0. Visitors

Individuals with disabilities who do not reside in the jurisdiction served by RTS (“visitors”) are entitled to receive 21 days of paratransit services within a 365 day period before obtaining an eligibility certification from RTS Access. The 21 days may be continuous, or parceled out over several shorter visits. Visitors are considered eligible for RTS paratransit services if they do one of the following.

1. Present documentation of A D A paratransit eligibility from their home jurisdiction’s paratransit system; or
2. Present proof of visitor status (i.e., proof of residence somewhere else).

If the person’s disability is not apparent (e.g., cognitive disability or cardiac condition), RTS Access is permitted to request documentation of the disability, such as a letter from a medical professional or eligibility for other services based on a determination of disability. Once this basic documentation is provided, RTS Access will make service available based on the person’s statement that he or she is unable to use the fixed route bus system.

End of Paratransit Eligibility Policy in Exhibit 11.

Text of the RTS Access Paratransit Application for Eligibility Certification, Version 4

Instructions

If you are unable to travel on an RTS fixed route bus service due to a disability, you may be eligible to use RTS Access, a paratransit bus service, within certain areas of Monroe County, NY. This allows you to schedule the specific bus rides you need instead of following a fixed route bus schedule and also allows you to share a bus ride with other people who are traveling to a similar location and time.

How do I know if I am eligible and how do I apply?

Step 1: Please read the entire page one (1) to ensure you are eligible to apply for paratransit bus services with RTS Access and read the instructions on how to complete the application process.

Step 2: Please read page two (2) completely and ensure that you complete each step outlined in the checklist. RTS Access will only accept applications that are completed in full.

Do not detach Part 5.

Once we receive the fully completed application, we will notify you within 21 business days. We thank you for your patience and hope you enjoy the ride.

Questions about completing the application?

Please fill out an online form at myRTS.com/contact-us or call us Monday through Friday from 8 am to 5 pm at 585-224-8330, Option # 2.

What is Paratransit?

RTS Access provides public transportation for people with disabilities who are unable to use the fixed route RTS buses in Monroe County. If you are eligible, you will reserve the trips you need instead of following a fixed bus schedule; and share the bus ride with other people who reserved the same trip.

How is Eligibility Determined?

We do not base the eligibility decision automatically on symptoms, type of disability, use of a mobility aid, age, income, ability to drive, or access to private automobile transportation. We consider your functional ability; and whether you are unable to travel on RTS fixed route service all or some of the time due to your disability; and your effort and risk during travel.

When Can I Use RTS Access?

We need to determine your eligibility before you can use RTS Access. You cannot use RTS Access during the application process. We will try our best to make a decision within 21 days of receiving your entire completed application. If we need more than 21 days, we will notify you and give you temporary permission to use RTS Access service.

What Else Do I Need to Know?

We must receive the entire completed application before we will process it. Use the Part 1 Checklist to ensure that your application is completed properly.

Do not allow a doctor’s office to fax sections to us. We no longer accept faxed applications.

The application process is necessary to assess your eligibility but does not guarantee that you will be certified eligible; and often includes an interview and/or functional assessment.

After we complete the process, we will send a letter confirming or denying your application for certification. If you feel the decision is incorrect, you can file an appeal within 60 days.

Important Note on Part 5: This part must be filled out by a licensed health care provider whom you authorize to release your personal health information. Do not detach Part 5. The provider will need the information in Parts 1, 2, 3, and 4. Your information will be kept confidential and will not be shared with anyone outside the RTS Access eligibility process and will not be released to any other party without your written permission to the maximum extent permissible under law. If you or another unqualified person fills out the information, it is fraud and invalidates your application. If you skip any part, we will be unable to determine your eligibility. Do not allow a medical office to send copies or documents separately to RTS.

How Do I Submit My Application?

Send the entire, complete application to RTS Paratransit Eligibility through one of the following methods.

Method 1: United States Postal Service

Mail the application to “RTS Paratransit Eligibility” 1372 East Main Street, Rochester, New York 14609.

Method 2: Electronic Mail

Email the application file to access@myrts.com. Put your name and RTS Paratransit Eligibility in the subject line.

Method 3: In Person

Drop the application off at the desk in the front lobby of R G R T A at 1372 East Main Street, Rochester, New York 14609. The lobby is open Monday through Friday from 8:00 AM to 5:00 PM.

Part 1: Mandatory Checklist

After completing each step, check the box and write your initials.

1. Confirm if I Live in the Service Area

I dialed 585-224-8330, Option #3 to learn whether my address is inside or outside the RTS Service Area. I understand that if I am eligible for paratransit service but live outside the service area, I will need another way to reach the pick-up points inside the service area, my trips must be within the service area, and I will need another way to travel from an RTS Access drop-off point to my final destination.

[Checkbox] Inside the paratransit area

[Checkbox] Outside the paratransit service area.

[Checkbox] [Space for your Initials]

1. Provide My Personal Information and Complete the Self-Assessment

I provided my current contact information.

I answered all the questions about my ability or inability to use the regular RTS buses (“fixed route buses”).

[Checkbox] [Space for your Initials]

1. Authorize the Release of My Personal Health Information

I provided the contact information for my providers and signed the authorization.

[Checkbox] [Space for your Initials]

1. Ask My Authorized Licensed Health Care Provider to Complete the Assessment and Provide Materials

I gave Parts 1, 2, 3, and 4 to my provider(s) along with Part 5.

My provider(s) completed the assessment and returned all pages to me.

My provider(s) gave me at least one of the required supporting materials, which I attached to my application.

[Checkbox] [Space for your Initials]

1. Recent Photo of Myself

Sending a photo may expedite the creation of a photo ID if you are certified eligible. If you email the photo, put your full name in the subject line.

[Checkbox] I attached my photo to the application with a paperclip.

[Checkbox] I emailed my photo to access@myrts.com (full name in the subject line).

[Checkbox] I prefer to come to the RTS location to have my photo taken.

[Checkbox] [Space for your Initials]

1. Review the Application

I made sure all questions have answers and all portions needing a signature are signed by the correct person.

I attached the materials from my authorized licensed health care provider.

[Checkbox] [Space for your Initials]

1. Make a Copy for My Records

I copied my completed application for my personal reference.

[Checkbox] [Space for your Initials]

I understand this application is part of the process to determine eligibility for A D A paratransit service and that giving false information may result in penalties. I affirm that the information in this application is true to the best of my knowledge. I understand that RTS will process my application in the date order received and that my application must be complete or it will be returned to me.

Name of Applicant or Personal Representative: [Space for the name]

Signature of Applicant or Personal Representative: [Space for the signature]

Date: [Space for the date]

Phone Number of Applicant or Personal Representative: [Space for the phone number]

Address of Applicant or Personal Representative [Space for the address]

The following Representative signed on my behalf:

[Checkbox] Parent (if applicant is a minor)

[Checkbox] Power of Attorney

[Checkbox] Legal Guardian

[Checkbox] As the Applicant, I signed on my own behalf

End of Part 1 of 5 in RTS Access Paratransit Application for Eligibility Certification in Exhibit 11

Part 2: Identification

Date: [Space for the date]

Is this application for a recertification?

[Checkbox] Yes

[Checkbox] No

If “Yes” write the Expiration Date and Access ID #

Expiration Date [Space for the expiration date]

Access ID # [Space for number]

Name: [Space for name]

Phone Numbers [Space for home phone and mobile phone]

My preferred phone number is:

[Checkbox] Home

[Checkbox] Mobile

[Checkbox] No Preference

Email: [Space for email]

Date of Birth: [Space for date]

Address: [Space for street address]

Apt/Unit: [Space for info]

City, State, Zip: [Space for info]

Provide information for the person we should contact in an emergency.

Emergency Contact Name: [Space for name]

Relationship to Applicant: [Space for description]

Phone Number(s): [Space for numbers]

1. Due to my disability, I require information in an alternate format.

[Checkbox] No

[Checkbox] Yes

If yes, write the format here. [Space for description]

1. Where should we send future information?

[Checkbox] To me, the Applicant

[Checkbox] To the Designee listed below

Name of Information Designee: [Space for name]

Address of Information Designee: [Space for address]

Email of Information Designee: [Space for email]

End of Part 2 in RTS Access Paratransit Application for Eligibility Certification in Exhibit 11

Part 3: Self-Assessment

Using fixed route service (regular RTS buses) does not automatically exclude you from paratransit eligibility.

1. I have the following diagnosed disability/disabilities. Do not list symptoms or mobility devices. List the name of your diagnosed/ disabilities: [Space for answer]
2. I am unable to use regular RTS buses all or some of the time without the assistance of another individual because: [Space for answer]
3. My condition (mark all that apply):

[Checkbox] Is Constant

[Checkbox] Changes Daily

[Checkbox] Changes at Different Times of Day

[Checkbox] Is in Remission

[Checkbox] Not Applicable

1. I am able to do this activity all or some of the time (mark all that apply):

[Checkbox] Get to the RTS bus stop

[Checkbox] Wait alone at the RTS bus stop or curb

[Checkbox] Board the RTS bus

[Checkbox] Travel alone from a drop-off point to my destination

[Checkbox] Transfer from one RTS bus to another

[Checkbox] Ride the RTS bus

[Checkbox] Exit the RTS bus

[Checkbox] Navigate the RTS bus system

[Checkbox] Navigate the RTS Transit Center

[Checkbox] Find my way (visually / cognitively)

[Checkbox] Sign my name

[Checkbox] Use a phone to call for assistance

[Checkbox] Give addresses upon request

[Checkbox] Give phone numbers upon request

[Checkbox] Travel alone as a passenger

[Checkbox] Count money to pay for a purchase

[Checkbox] Insert bills, coins, or cards into a machine

[Checkbox] Recognize a destination or landmark

[Checkbox] Ask for and follow oral instructions

[Checkbox] Ask for and follow written instructions

[Checkbox] None of the choices apply to me

1. I use the following assistive devices all or some of the time (mark all that apply):

[Checkbox] Cane

[Checkbox] Crutches

[Checkbox] Walker

[Checkbox] Prosthesis

[Checkbox] Portable oxygen or respirator

[Checkbox] Manual wheelchair

[Checkbox] Motorized wheelchair or scooter

[Checkbox] Not applicable

[Checkbox] Extra wide or heavy duty wheelchair (24 to 34 inches wide)

[Checkbox] Other answer: [Space for answer]

1. I am able to navigate this situation all or some of the time (mark all that apply):

[Checkbox] Unpaved areas or paths

[Checkbox] Places without curb cuts

[Checkbox] Steep sidewalks or streets

[Checkbox] RTS bus stops

[Checkbox] Snow on sidewalks or streets

[Checkbox] Busy streets and intersections

[Checkbox] None of the choices apply to me

1. I use these modes of transport regularly (mark all that apply):

[Checkbox] I do not use other modes of transport regularly

[Checkbox] Regular bus (RTS fixed route)

[Checkbox] Ambulance

[Checkbox] Friend/relative gives me a ride

[Checkbox] Personal vehicle (car)

[Checkbox] Walking (with or without a mobility aid)

[Checkbox] Wheelchair or scooter

[Checkbox] Agency-sponsored ride from: [Space for answer]

[Checkbox] Other answer: [Space for answer]

1. If you marked “Wheelchair or scooter,” provide these details. Otherwise, mark “Not Applicable.”

My Weight in Pounds [Space for answer]

Device Weight in Pounds [Space for answer]

[Checkbox] Not applicable

Make and Model [Space for answer]

Weight Capacity [Space for answer]

[Checkbox] Not applicable

Overall Width in Inches [Space for answer]

Overall Length in Inches [Space for answer]

[Checkbox] Not applicable

Battery Life (Minutes) or Battery Type [Space for answer]

Maximum Driving Range in Miles [Space for answer]

[Checkbox] Not applicable

1. I can travel these distances on my own (mark all that apply):
2. To/from the bus stop nearest to my residence:

[Checkbox] Walking without a mobility device

[Checkbox] Walking with a mobility device

[Checkbox] Using a wheelchair or scooter

[Checkbox] Not at all

1. To the curb only:

[Checkbox] Walking without a mobility device

[Checkbox] Walking with a mobility device

[Checkbox] Using a wheelchair or scooter

[Checkbox] Not at all

1. One block:

[Checkbox] Walking without a mobility device

[Checkbox] Walking with a mobility device

[Checkbox] Using a wheelchair or scooter

[Checkbox] Not at all

1. Three blocks (1/4 mile):

[Checkbox] Walking without a mobility device

[Checkbox] Walking with a mobility device

[Checkbox] Using a wheelchair or scooter

[Checkbox] Not at all

1. Six blocks (1/2 mile)

[Checkbox] Walking without a mobility device

[Checkbox] Walking with a mobility device

[Checkbox] Using a wheelchair or scooter

[Checkbox] Not at all

1. Nine blocks (3/4 mile)

[Checkbox] Walking without a mobility device

[Checkbox] Walking with a mobility device

[Checkbox] Using a wheelchair or scooter

[Checkbox] Not at all

1. The following weather conditions will affect my answers to question #8 (mark all that apply):

[Checkbox] Not applicable

[Checkbox] Snow accumulation of 2 inches or more

[Checkbox] Rainfall of ½ inch per hour or more

[Checkbox] Sustained wind speeds of 25 miles per hour or more

[Checkbox] Ice

[Checkbox] Temperature above 80 degrees Fahrenheit

[Checkbox] Temperature below 30 degrees Fahrenheit

[Checkbox] Other answer: [Space for answer]

1. I can reasonably travel this distance under optimal conditions in an accessible area on my own:

Distance in Feet, Blocks, or Miles [Space for answer]

1. My ability to cross streets is as follows (mark all that apply):
2. I can cross a two-lane street:

[Checkbox] Yes with Help

[Checkbox] Yes on My Own

[Checkbox] Sometimes on My Own

[Checkbox] No

Other Answer [Space for answer]

1. I can cross a four-lane highway with traffic lights:

[Checkbox] Yes with Help

[Checkbox] Yes on My Own

[Checkbox] Sometimes on My Own

[Checkbox] No

Other Answer [Space for answer]

1. I use the following some or all of the time:

[Checkbox] Personal Care Attendant designated to assist me with one or more life activities regularly

[Checkbox] Service Animal trained to assist me

[Checkbox] Not applicable

End of Part 3 in RTS Access Paratransit Application for Eligibility Certification

Part 4: Authorization to Disclose Protected Health Information

Print the Applicant’s Name and Date of Birth Here [Space for answer]

I authorize the providers named here, his or her officers, employees, agents, contractors, members, directors, shareholders or affiliates entrusted with handling medical records, to disclose to RTS Access all of the protected health information relating to me that is reasonably necessary for the provider to fully and accurately complete Part 5 of this application.

1. Name of Provider: [Space for answer]

Office or Facility Address: [Space for answer]

Office Phone: [Space for answer]

1. Name of Provider: [Space for answer]

Office or Facility Address: [Space for answer]

Office Phone: [Space for answer]

1. Name of Provider [Space for answer]

Office or Facility Address: [Space for answer]

Office Phone: [Space for answer]

This authorization shall remain in effect until my eligibility for RTS paratransit service is finally determined or 60 days from the date of the authorization, whichever occurs first. I acknowledge that I have the right to revoke this authorization at any time by sending written notification to the persons named above. I understand that the revocation of this authorization is not effective to the extent that the named provider has relied upon it for the use or disclosure of the Protected Health Information prior to receiving my written revocation notice. I understand that any Protected Health Information disclosed pursuant to this Authorization to an individual or entity that is not covered by state and federal privacy laws and regulations may be subject to re-disclosure by the recipient and may no longer be protected by federal or state law. I acknowledge that the named persons will not condition my treatment, payment, enrollment in a health plan or eligibility for benefits (if applicable) on whether I sign this Authorization.

Printed Name, Signature, and Date [Space for name, signature, and date]

The following Representative signed on my behalf:

[Checkbox] Parent (applicant is a minor)

[Checkbox] Power of Attorney

[Checkbox] Legal Guardian

[Checkbox] As the Applicant, I signed on my own behalf

End of Part 4 in RTS Access Paratransit Application for Eligibility Certification

Part 5: Health Care Provider Assessment and Verification

Attention Applicants: A licensed or certified professional or disability service provider who is qualified to render the specific diagnoses and assessments must complete this Part 5. COMPLETE PARTS 1 THROUGH 4 AND GIVE THEM TO YOUR PROVIDER FOR REVIEW. You, or your representative, are responsible for getting the application to the Provider and collecting the completed application and supporting material.

Attention Medical Professionals and Disability Service Providers: The Applicant must be your current patient or client. The Applicant must provide authorization for you to release his/her Protected Health Information (Part 4) and must give you the entire application (Parts 1 through 5).

Your patient or client is applying for eligibility certification to use the tax-supported paratransit service through RTS Access. Paratransit eligibility is based on whether a person, due to his or her disability, is unable to use the regular A D A compliant and accessible RTS bus system (fixed route) which provides public transportation to residents in the Monroe County service area.

Failure to provide the information in this Part will prevent or delay processing of the patient or client’s application for eligibility certification.

The following are not qualifying factors for paratransit service: age, income, convenience of the service, fear of falling, fear of crowds, fear of crime, fear of darkness, inability to drive, or inability to carry packages.

Do not detach any part of the application. Return the entire application and materials to the patient/client or representative (parent, legal guardian, power of attorney).

Do not fax copies or materials to RTS. Faxes are no longer accepted for eligibility applications.

All Protected Health Information will be kept confidential. Call 585-654-0608 if you have questions.

1. I am a New York State licensed:

[Checkbox] Medical Doctor (MD or DO)

[Checkbox] Psychologist (Ph. D.)

[Checkbox] Psychiatrist (MD or DO)

[Checkbox] Licensed Mental Health Professional

[Checkbox] MDS Nurse (Skilled Nursing Facilities Only)

[Checkbox] Nurse Practitioner (ARNP)

[Checkbox] Physician’s Assistant

[Checkbox] Optometrist or Ophthalmologist

[Checkbox] Physical or Occupational Therapist

[Checkbox] Certified Orientation and Mobility Specialist

1. Licensed Professional Identification (please print clearly):

Name: [Space for name]

License #: [Space for New York State Certification Number or License Number]

Contact: [Space for phone number, business address, and email)

1. Patient/Client Identification (please print clearly)

Name: [Space for patient name]

Date of Birth: [Space for date]

1. List the condition that would prevent the Patient or Client from independently getting to or from or riding on an accessible RTS bus equipped with a ramp and kneeler. One diagnosis is required, but additional fields are available.

#1 Diagnosis/Condition (not symptoms) [Space for description]

Degree (mark all that apply)

[Checkbox] Mild

[Checkbox] Moderate

[Checkbox] Severe

[Checkbox] Episodic

[Checkbox] Permanent

[Checkbox] Temporary

Status (mark all that apply)

[Checkbox] Active

[Checkbox] In Remission

[Checkbox] Controlled w/ Medication

#2 Diagnosis/Condition (not symptoms) [Space for description]

[Checkbox] Mild

[Checkbox] Moderate

[Checkbox] Severe

[Checkbox] Episodic

[Checkbox] Permanent

[Checkbox] Temporary

Status (mark all that apply)

[Checkbox] Active

[Checkbox] In Remission

[Checkbox] Controlled w/ Medication

#3 Diagnosis/Condition (not symptoms) [Space for description]

[Checkbox] Mild

[Checkbox] Moderate

[Checkbox] Severe

[Checkbox] Episodic

[Checkbox] Permanent

[Checkbox] Temporary

Status (mark all that apply)

[Checkbox] Active

[Checkbox] In Remission

[Checkbox] Controlled w/ Medication

1. I have read Part 3 and agree with the Patient or Client’s self-assessment.

[Checkbox] Yes

[Checkbox] No

[Checkbox] Somewhat

If NO or SOMEWHAT, explain: [Space for explanation]

1. I am providing the Patient or Client with this material to submit with his or her Application as required by RTS Access (provide at least one of the following items; mark each that you provided).

Physical Mobility

[Checkbox] Medical Summary / Active Problem List

[Checkbox] Patient Care plan

[Checkbox] Current Therapy plan (PT or OT)

Cognitive, Mental Health, or Neurological

[Checkbox] Current Clinical Assessment

[Checkbox] Current GAF score

[Checkbox] Most recent Psychological Evaluation with IQ and Adaptive Functioning score

Sensory Measure

[Checkbox] Visual acuity

[Checkbox] Hearing acuity

1. My signature attests to the following: I am certified or licensed in New York State as a disability service provider or medical professional. The patient or client is currently under my care and I am authorized to release his or her Protected Health Information to degree relevant for this eligibility application. I understand that the information I provide is necessary to corroborate a patient/client’s application for eligibility for paratransit service under the "Americans With Disabilities Act of 1990 "(A D A) and its regulations, Section 37.123(e), within the designated paratransit service areas of RTS. My statements are true and based on legitimate records, diagnosis, and assessment.

Printed Name [Space for name]

Signature [Space for provider’s signature]

Date [Space for date]

End of Part 5 of RTS Access Paratransit Application for Eligibility Certification

End of Text of the RTS Access Paratransit Application for Eligibility Certification in Exhibit 11.

Renewal for All-Trip Paratransit Eligibility Certification

The following text appears on the form for renewing an All-Trip Certification.

Date [field for the date the form is filled out]

Date of Birth [field for the customer’s date of birth]

Name [field for name]

Phone Numbers [field for Home Phone number and Mobile Phone number]

My preferred phone number is:

[Checkbox #1]: Home

[Checkbox #2]: Mobile

[Checkbox #3]: No Preference

Email: [field for email address]

Address: [field for mailing address or residential address]

Emergency Contact Name and Relationship: [field to identify the person to contact in an emergency and the person’s relationship to the customer]

Phone Numbers: [field to provide emergency contact’s phone numbers]

1. I use the following to assist me (mark all that apply).

[Checkbox] Cane

[Checkbox] Crutches

[Checkbox] Walker

[Checkbox] Prosthesis

[Checkbox] Portable oxygen or respirator

[Checkbox] Manual wheelchair

[Checkbox] Motorized wheelchair or scooter

[Checkbox] Wheelchair 24 to 34 inches wide

[Checkbox] Personal Care Attendant

[Checkbox] Service Animal

[Checkbox] Not applicable

[Checkbox] Other answer: [Space for answer]

2. Describe any changes to your travel abilities or needs. [field for providing description]

3. Would you like us to inspect your Access ID card to determine if you need a replacement?

[Checkbox]: No

[Checkbox]: Yes

4. Due to my disability, I require information in an alternate format.

[Checkbox]: No

[Checkbox]: Yes

If Yes, please write the format. [field for describing the alternate format].

5. Where should we send future information?

[Checkbox] To me, the Customer

[Checkbox] To the Designee listed below

Name of Designee: [field for name]

Address of Designee: [field for mailing address]

Email of Designee: [field for email address]

Signature of Customer or Personal Representative: [field for signature]

Mail or deliver the completed form to the A D A Certification Coordinator at 1372 East Main Street, Rochester, NY 14609.

End of Text of the Renewal for All-Trip Paratransit Eligibility Certification form in Exhibit 11.

Text of the Request to Appeal an Eligibility Decision

Please complete this form if you would like to appeal our determination regarding your eligibility for RTS Access. Return the completed form to the Paratransit Appeals Coordinator located at 1372 East Main Street, Rochester NY 14609. The Coordinator must receive your request no later than 60 days from the date in the body of your eligibility determination letter. If the Coordinator receives your request by the deadline, the Coordinator will contact you and arrange for your appeal to go before the RTS Paratransit Appeals Committee. If the Coordinator receives your request after the deadline, the original determination remains in effect.

Provide your name, phone number, and mailing address.

Provide your name, phone number, and Client ID Number.

Customer Name [field for name]

Phone Number [field for phone number]

Mailing Address [field for address]

Select one of the following choices for your appeal participation.

[Checkbox 1]: I choose to submit additional information for the Paratransit Appeals Committee to consider, but do not want to appeal in person. (If you choose this option, please send all additional information you would like the Paratransit Appeals Committee to consider along with this form. Please consider the information on the page attached to your letter of determination titled “Basis for the Determination” when preparing additional information.)

OR

[Checkbox 2]: I choose to appeal in person.

(If you choose this option, we will contact you to schedule a mutually agreeable day and time for the appeal hearing. You may bring additional information to the hearing and can attend with others who are able to provide information on your behalf. If you have a disability that requires a Reasonable Accommodation in order for you to participate in the appeal hearing, please request the accommodation in advance from RTS Access.)

The eligibility decision I am appealing is dated [field for the date of the determination].

Select the choice that best describes the decision you want to appeal.

[Checkbox 1]: Determination of ineligibility

Or

[Checkbox 2]: Type of eligibility

Signature [field for signature]

Date [field for date of signature]

Mail or deliver the completed form to 1327 East Main Street, Rochester NY 14609, Attention: Paratransit Coordinator.

End of the Text of the Request to Appeal an Eligibility Decision form in Exhibit 11.

Paratransit Appeal Process and Procedures

1.0. Overview

The Rochester-Genesee Regional Transportation Authority (R G R T A) provides complementary paratransit services in Monroe County through RTS Access. This Procedure explains the process for appealing a determination of ineligibility, appealing the type of eligibility, appealing a paratransit service suspension determination based on Repeated Service Infractions, and appealing a paratransit service suspension based on prohibited conduct. This Procedure is in accordance with the provisions of 49 CFR Part 37 Subchapter F.

2.0. Policy

Applicants who are found ineligible for paratransit or who dispute the eligibility determination of Conditional or Temporary eligibility shall have the right to appeal the determination. An appeal form is included with the determination.

Certified eligible paratransit customers suspended from service for incurring Repeated Service Infractions shall have the right to appeal the service suspension determination. An appeal form is included with the determination.

Certified eligible paratransit customers suspended from service for 31 days or more due to Prohibited Conduct under the Rules of Conduct shall have the right to appeal the service suspension determination. The customer can submit an appeal in writing.

2.1. Definitions

Authority and R G R T A each mean the Rochester-Genesee Regional Transportation Authority and shall include RTS Access. Paratransit means transportation services provided to persons with disabilities pursuant to the Americans with Disabilities Act of 1990 and the provisions of 49 CFR Part 37 Subchapter F.

3.0. Appealing a Determination of Ineligibility or a Certification Type

Individuals must mail or deliver the appeal form so that RTS Access receives the appeal form no later than 60 days from the date in the body of the notification letter.

The appellant has the right to be heard in-person for the appeal. At his or her discretion, the appellant may elect to include the reasons for the appeal along with the appeal request form. The appellant may choose to submit written information in advance of a scheduled appeal hearing. The appellant may bring a representative of his or her choice to assist in the presentation of the appeal.

The appellant may elect to submit written basis for the appeal rather than attend the scheduled appeal hearing in person. During the scheduled hearing, the written information will be reviewed.

RTS Access will not provide paratransit service to the appellant while the appeal decision is pending. After the hearing is complete, RTS Access must issue a decision about the eligibility appeal within 30 days. If RTS does not issue the eligibility appeal decision in 30 days, RTS Access must provide paratransit service to the appellant until it issues the decision.

4.0. Appealing a Service Suspension Issued for Repeated Service Infractions

Individuals must mail or deliver the appeal form so that RTS Access receives the appeal form no later than 14 days from the date in the body of the service suspension letter. If the individual files an appeal before the suspension start date, RTS Access postpones the suspension during the appeal process. If the individual’s suspension included revoking a trip subscription, the revocation is also postponed during the appeal process.

The appellant has the right to be heard in-person for the appeal. At his or her discretion, the appellant may elect to include the reasons for the appeal along with the appeal request form. An appellant may appeal the basis for a proposed suspension even if he or she elects not to dispute any individual Service Infraction. The appellant may choose to submit written information in advance of a scheduled appeal hearing. The appellant may bring a representative of his or her choice to assist in the presentation of the appeal.

The appellant may elect to submit written basis for the appeal rather than attend the scheduled appeal hearing in person. During the scheduled hearing, the written information will be reviewed.

RTS Access will provide paratransit service to the appellant, including trip subscriptions, while the appeal decision is pending.

5.0. Hearings for Eligibility Determinations or for Service Infraction Service Suspensions

The procedural components in Section 5 apply only to hearings for an appeal of ineligibility, eligibility type, or a service suspension due to Repeated Service Infractions. Section 6 in this document covers the hearing procedures for the appeal of a service suspension due to Prohibited Conduct.

5.1. Paratransit Appeals Committee

RTS Access shall develop a pool of Paratransit Appeals Committee members (hereafter referred to as “the Committee”). RTS Access may recruit members from any source that R G R T A deems appropriate so long as the individuals selected are not involved in the RTS Access initial determination processes for eligibility or for service suspension. Due to the nature of the information that will be presented during hearings for Appeals of Eligibility, all Committee members will be required to sign a non-disclosure agreement.

5.2. Scheduling an In-Person Hearing

The Committee shall meet at least once per month. Appeals received by RTS Access shall be scheduled to be heard at the next scheduled meeting of the Committee.

RTS Access will work with the appellant to find a mutually convenient time for the hearing. Once a hearing is scheduled, it cannot be rescheduled unless the appellant provides justification for why he or she is unavailable on the scheduled hearing date. RTS Access reserves the right to request evidence of the appellant’s unavailability including letters from doctors, employers or other professionals. If the appellant is unavailable on the originally scheduled hearing date and can provide a justifiable cause, RTS Access will reschedule the hearing for the following month. RTS Access will allow one such scheduling exception per appeal.

##### 5.3. Advance Notice of the Scheduled Hearing

RTS Access shall provide appellants with advance notice of the hearing date in an accessible format. The notice shall communicate the following information:

1. The date, time, and location of the scheduled hearing; and
2. The appellant may elect to bring a representative of his or her choosing to assist in the appeal; and
3. The appellant has the right to present any new evidence, orally or in written form, that he or she believes supports his or her eligibility for paratransit services, or which supports his or her right to continued paratransit services.

5.4. Missing the Scheduled Hearing

If an appellant requests to appear in person for the hearing, but does not appear for the scheduled hearing, the appellant must contact the Paratransit Appeals Coordinator at 585-654-0200 within 24 hours of the missed hearing date and provide justification for the absence. If the appellant provides sufficient justification for the absence, the hearing will be rescheduled for the following month. RTS Access will allow one such scheduling exception per appeal.

If the appellant does not contact the Paratransit Appeals Coordinator within 24 hours of the hearing and provide sufficient justification for the absence:

1. The appellant will waive the right to appear in person for a hearing on his or her appeal of a service suspension or an eligibility decision; and
2. The Committee will base its decision on the appeal’s merit and the decision will stand.

5.5. Prior to the Hearing

RTS Access shall select three members from the Committee pool to preside over each Committee hearing in advance of the hearing. Prior to the scheduled hearing, RTS Access shall provide each member with the docket of appeals to be heard. RTS Access may elect to provide the Committee members with information regarding the scheduled appeals in advance of the hearing. If RTS Access elects to provide such information, the same information shall also be provided to the appellant.

RTS Access shall require that each Committee member inform RTS Access of any personal, financial, or professional relationships the member has with the appellant.

If a Committee member declares a personal, financial, or professional relationship with an appellant, RTS Access shall remove the member from the panel hearing the individual’s appeal, and shall replace the member with another member who does not have any personal, financial, or professional relationship with the appellant.

5.6. During the Hearing

Hearings shall be conducted in a manner that provides the appellant with a fair opportunity for presenting reasons or evidence that support his or her position. The appellant must be given the opportunity to respond directly to each reason cited by RTS Access to justify an eligibility determination or order of service suspension.

During the hearing, the Committee will consider the appeal based on the merits of the appeal, written evidence (if available), and in-person statements (if available).

The regular order of the hearing will be as follows:

1. Opening of hearing;
2. Introduction of parties;
3. Presentation of RTS Access ineligibility, eligibility type, or suspension rationale;
4. Presentation of the appellant’s rationale for his or her position;
5. Questions from the Committee members;
6. Closing of the hearing, including an explanation of the decision issuance process.

The hearings are intended to be informal proceedings. No formal rules of evidence or formal administrative law or judicial procedures apply. The regular order of the hearing outlined herein shall not preclude the Committee from deviating from it in cases where doing so is in the best interests of fairness, or necessary to obtain the information to render an informed decision.

5.7. After the Hearing

After the hearing closes, the Committee shall deliberate until it reaches a decision regarding the appeal. The Committee shall exclude both the appellant and staff presenting RTS Access’s position from the deliberative process.

The Committee may elect to have an RTS Access staff person present to provide administrative support. Any RTS Access staff present 1) shall not have any relationship with the processes for determining ineligibility, eligibility type, or service suspension; and 2) shall not be a supervisor or subordinate of the person making the ineligibility, eligibility type, or service suspension determination.

A decision shall be reached by majority vote of the three-person panel. In reaching a decision, the Committee shall consider the RTS Access paratransit eligibility guidelines, applicable RTS Access rules and procedures, and all evidence presented by RTS Access and by the appellant. Each Committee member shall indicate his or her vote and rationale on a form provided by RTS Access. The Committee’s decision shall be final.

RTS Access shall issue a written decision in an accessible format to the appellant within 30 days of the hearing date. The decision letter shall be prepared by an individual whom is neither 1) involved in the ineligibility, eligibility type, or suspension determination; nor 2) a supervisor or subordinate of the person making the determination. The decision letter shall accurately reflect the decision of the Committee. If the decision upholds RTS Access’s initial determination of ineligibility, eligibility type, or service suspension, the written decision shall explain in detail the Committee’s rationale for the decision.

If a written decision pertaining to an appeal of ineligibility is not issued within 30 days of the hearing, RTS Access shall deem the individual eligible for paratransit services until a written decision is issued.

5.8. Maintaining a Record of the Hearing

RTS Access shall maintain a complete and accurate record of each appeal hearing. The official record of each appeal hearing shall include:

1. A copy of the ineligibility, eligibility type, or suspension determination;
2. A copy of all notices issued related to the appeal;
3. A copy of all evidence presented by RTS Access in support of the ineligibility, eligibility type, or suspension determination;
4. A copy of all evidence presented by the appealing individual in support of his or her position;
5. A copy of each Committee member’s appeal decision form;
6. A copy of the appeal decision letter; and
7. A written or electronically recorded transcript of the appeal hearing.

6.0. Appealing a Service Suspension Issued for Prohibited Conduct

RTS Access shall enforce, exclude from service, and provide notice of exclusion (suspension) in accordance with the procedures identified in R G R T A’s Rules of Conduct for Transit Vehicles, Facilities, and Properties (“Rules”).

The appeals process shall be provided to any person excluded (suspended from service) for a period of 31 days or more due to prohibited conduct.

Not later than ten calendar days after commencement of the suspension, an excluded person may appeal in writing to the R G R T A Chief Executive Officer or designee, for a new review of the suspension. Commencement of the suspension shall be the date upon which the suspension became effective and shall be determined by R G R T A’s official records. The appellant may request a hearing or may request review without a hearing based on a written statement setting forth the reasons why the suspension is invalid or improper. If the excluded person is unable to respond in written format, R G R T A will make reasonable accommodation to allow due process. The Chief Executive Officer shall convene a Hearing Panel comprised of three persons selected as follows:

1. The Manager of Transit Center Operations or designee;
2. The Manager of Service Delivery or designee;
3. The Director of Service Delivery or designee; or
4. A person selected from the R G R T A staff by the Chief Operating Officer or designee.

The said R G R T A staff person shall be a person other than the Chief Executive Officer. The decision of the majority of the members of the Hearing Panel shall be the decision of the Hearing Panel. The Hearing Panel shall hear the appeal, or if no hearing is requested, review the matter based upon the record, and render a written decision within twenty calendar days after the receipt of the appeal. The decision of the Hearing Panel shall be final.

If a hearing is requested, the hearing shall be held within twenty calendar days after receipt of the appeal, and a written decision shall be rendered within twenty calendar days after the hearing.

RTS Access will provide paratransit service to the appellant while the appeal decision is pending, including transportation to the hearing if necessary.

End of Paratransit Appeal Process and Procedures in Exhibit 11.

Text of the Internal Process Maps (Flow Charts) for Eligibility Certifications and Appeals

1.0 Customer Requests for Service

1. Access office receive a request for new service.
2. Search name in CRM for existing customer.
3. Customer in system?
4. If Yes, verify information, click on new case, case type inquiry, close, and send application.
5. If No, Create customer, enter details and select record type: new customer. Create a new case, case type inquiry, close, and send application.

2.0 Receive New and Recertification Applications

1. Receive application. Open envelope and date and time stamp paperwork.
2. Search for customer in CRM. Enter new or updated customer information.
3. Review application for completeness and medical support information.
4. Application info complete?
5. If No, fill in info about what is missing and generate letter. Send letter and original application to customer.
6. If Yes, enter the complete date in CRM.
7. Is the application for recertification?
8. If Yes, run ridership report and look at service usage and assess the type of service required. If a functional assessment is required, perform the assessment. If the recertification is rejected, enter the date and reason for rejection. Prepare the rejection letter with appeal rights and form information and mail to customer. Close the case in CRM.
9. If No, approve the application or perform the functional assessment if necessary. If the applicant is ineligible, enter the date and reason for the ineligibility determination. Prepare the ineligibility letter with appeal rights and form information and mail to customer. Close the case in CRM.

3.0 Functional Assessment and Notification to Customer

3.1 Functional Assessment

1. Schedule functional assessment. Set up a day and time for assessment. Provide applicant with date and time.
2. Customer arrives. Interview and observe customer for overall assessment. Take picture of customer and load into computer.
3. Customer certified?
4. If Yes, enter the assessment data and date of approval into CRM and generate the approval letter. Print the approval letter and the user id with picture. (batch printed). Place id, instructions, and policy information materials in envelope and mail to customer. Close case.
5. If No, Enter assessment data in CRM, enter reason for ineligibility, and open the ineligibility letter template. Prepare the ineligibility letter with appeal rights information and mail to customer. Close case.

3.2 Application Approved

1. Log in to Trapeze and update with new customer data and enter the new expiration date.
2. Print the approval letter and the user id with picture.(batch printed).
3. Place id, instructions, and policy information materials in envelope and mail to customer.
4. Close case.

4.0 Query CRM for Recertification Required and Notification to Customers

1. Run report the first of every month. Reports recert due in: 90 days with application, 60 days no application.
2. For each report: mail merge function, print labels, print blank applications with instructions (batch printed), stuff envelopes with letter and application (for 90 day only) and attach label.
3. Deliver to mail room for postage and mailing.

5.0 Lost ID Card Replacement

1. Receive notification from customer of a lost card.
2. Look up customer in Trapeze to verify customer is a valid Access user.
3. Valid user?
4. If No, place phone call to customer and send an application if requested.
5. If Yes, is picture on file and fee received?
6. If Yes, create and print ID card. Mail ID card with instructions to customer.
7. If No, call customer to notify them of picture and/or fee required. Receive customer picture and/or ID card replacement fee. Create and print ID card. Mail ID card with instructions to customer.

6.0 Eligibility Appeal Process

1. Ineligibility or Suspension: receive appeal form in the mail.
2. Assign to a pre-scheduled meeting and notify customer.
3. Pull original application and create package for appeals committee with RTS justification for ineligibility.
4. Send packet to CEO Exec Assistant. Schedule a hearing with the committee.
5. CEO Exec Assistant briefs the RTS staff person responsible for presenting the ineligibility information.
6. RTS staff representative present information to the appeals committee.
7. RTS Access resources on call.
8. Appeals meeting agenda:
9. Member introductions.
10. RTS justification presentation.
11. Customer response and documentation.
12. Committee questions.
13. Committee deliberations without RTS or customer presence.
14. Each committee member completes form with personal decision rationale.
15. Committee makes decision on eligibility.
16. Decision rationale is forwarded to the RTS A D A Coordinator.
17. Meeting is recorded. All notes taken by committee members are collected. Committee member forms are collected. Any other evidence presented by RTS or the customer is collected. All materials scanned and retained.
18. RTS determination upheld?
19. If No, the application is approved.
20. If Yes, RTS writes a letter (CRM template) with the final decision to the customer.

End of the text of the Internal Process Maps (Flow Charts) for Eligibility Certifications and Appeals in Exhibit 11

End of Exhibit 11

# Section 4: Public Participation Process to Develop the Plan

This section describes the public participation process. Using mailing lists of RTS Access customers and agencies who work with RTS Access, RTS Access will use direct mailings as a method of notifying the public about opportunities for providing input to the Plan. RTS Access will contact local organizations, such as the Center for Disability Rights and the Association for the Blind and Visually Impaired, to inform them of the plan and obtain feedback, and promote information sessions, Plan development, and public hearings. RTS Access will hold at least one public hearing to solicit public comment on the proposed Plan under the following circumstances: 1) The Plan proposes substantive changes to service criteria for comparable paratransit service; or 2) The Plan proposes comparable paratransit service for new fixed route service; or 3) R G R T A wishes to solicit comments using the forum of a public hearing. RTS Access will include the report of public comments received, the Authority’s responses to the comments and proposed changes on [www.myRTS.com](http://www.myRTS.com) and as an exhibit to this Plan. RTS Access will follow the processes outlined in the Rochester-Genesee Regional Transportation Authority Public Participation Plan.

Members of the public can provide comments at any time through the Contact Us online form at <http://rts.force.com/RTSContactUs>. Exhibit 5 in Section 2 provides the procedures and processes for Public Participation and describes the Notification process.

End of Section 4

Exhibits for Section 4

Section 4 will include exhibits from the Public Hearing on the proposed Paratransit Plan. These exhibits will include the transcript from the hearing, comments received during the comment period, and R G R T A’s response to the comments.

Exhibit 11: April 2, 2019 Public Hearing Transcript

When the transcript is available, it will be inserted in this exhibit.

End of Exhibit 11.

Exhibit 12: 2019 Public Participation Comments and Response

After the comment period ends for the April 2, 2019 Public Hearing, all the comments and responses will be inserted in this exhibit.

End of Exhibit 12.

Exhibit 13: Material from the November 28, 2017 Public Hearing

The public was able to participate in the development of the Plan during a Public Hearing on November 28, 2017, followed by a comment period that lasted until January 5, 2018. While that proposed Plan and report did not go before the Board of Commissioners, it was foundational in developing the 2019-2020 Plan for public comments.

This exhibit contains a Report on Public Comments from the 2017-2018 comment period and the full Transcript of the Public Hearing on Proposed Paratransit Plan Updates, November 28, 2017.

Report on Public Comments (2017-18)

This report contains all proposed revisions and suggestions resulting from public comments and all of the comments received during the Public Hearing about the Proposed Updates to the Paratransit Plan as well as during the comment period of November 28, 2017 to January 5, 2018.

Introduction

This report presents the results of the Public Hearing on the Proposed Changes to the RTS Access ADA Paratransit Plan. The report summarizes the participation process, identifies revisions to the proposed Plan, suggests future improvements, provides an overall response to the comments, and includes all public comments received.

Much of the Paratransit Plan identifies how RTS Access complies with requirements under the law. The information in this report represents an evolving process and is subject to change based on funding and resources. Implementation of any change, suggested improvement, or initiative is subject to operational decisions. The Board of Commissioners may authorize the implementation of the changes or may direct other action.

Summary

RTS Access held a Public Hearing on Nov. 28, 2017 about the Proposed Paratransit Plan. The proposed changes were to eliminate the term “enhanced service,” add a process for providing advance notice about major service changes, revise the policy on subscription service, revise the policy on no-shows, explain final pickups, include a no-strand policy, revise the application for paratransit eligibility, include the OTP goal, and include details about service animals, reasonable modifications, and making complaints.

A Court Reporter (stenographer) transcribed verbal comments from registered speakers at the Public Hearing. RTS Access accepted written comments via USPS hardcopy letters or via the online Contact Us form (CRM). The period for comments was Nov. 28, 2017 to Dec. 05, 2017. Of the 18 participants, 15 are active RTS Access customers, one is the parent of an RTS Access customer, one is a RTS fixed route customer, and one is a Certified Orientation and Mobility Specialist. Four participants were associated with The Association for the Blind and Visually Impaired (ABVI), The Center for Disability Rights (CDR), The National Federation of the Blind of Rochester, and Lifetime Assistance, Inc. Most people provided written comments. Twelve participants spoke at the Public Hearing, five of which also submitted written comments. We reviewed the comments, identified 17 topics, and tallied comments about each topic.

Topic 1: Response Time (Trip Reservations), 7 comments

Topic 2: Operational Policies & Procedures, 7 comments

Topic 3: No-Shows, Late Cancellations, and Suspensions, 7 comments

Topic 4: Service Area, 6 comments

Topic 5: Trip Subscriptions, 6 comments

Topic 6: Accessible Formats, 6 comments

Topic 7: Capacity, 6 comments

Topic 8: Handbook for Riders, 5 comments

Topic 9: Service Animals, 4 comments

Topic 10: System Redesign (Reimagine RTS), 3 comments

Topic 11: Request for Door-to-Door Service, 3 comments

Topic 12: Eligibility, 3 comments

Topic 13: Overall Communication, 2 comments

Topic 14: Fares, 2 comments

Topic 15: Restroom Request, 1 comment

Topic 16: Hours of Service, 1 comment

Topic 17: Budget, 1 comment

Due to the comments at the Public Hearing, RTS Access immediately extended the deadline for comments from Dec. 05, 2017 to Jan. 05, 2018. RTS Access also provided the proposed Paratransit Plan in accessible formats on Dec. 07, 2017.

Revisions

After evaluating the comments, RTS Access will make these clarifying revisions to the Paratransit Plan:

1. Correct the times for fixed route service (1.2.G. Days and Hours of Service).
2. Affirm commitment to provide appropriate accessible formats for time-sensitive materials (1.6. Accessible Formats, new section).
3. Update estimate of demand (2.1. Estimate of Demand).
4. Clarify advance reservations (2.4.B. Responding to Requests for Rides).
5. Correct the description of Scheduler and Dispatcher duties (2.4.B. Responding to Requests for Rides).
6. Add information about children, companions, and personal care attendants (2.4.B. Responding to Requests for Rides).
7. Include steps for reporting an early departure (2.4.B. Responding to Requests for Rides).
8. Include language about requests to use a restroom during a trip (2.4.B. Responding to Requests for Rides).
9. Describe the ability to purchase $18 and $20 passes online (2.4.C. Fares).
10. Add information about service animals (2.5.B. Service Animals).
11. Move the sentence about excusing trips missed for reasons beyond the customer’s control to the Overview portion of the Paratransit No-Shows and Service Suspensions policy.
12. Amend the Paratransit Trip Subscriptions policy:
13. Add a sentence about excusing trips missed for reasons beyond the customer’s control to page 1.
14. Amend the conditions to qualify for a subscription (no more than one Service Suspension in 6 consecutive months).
15. Define Subscription Advance Cancellation and Late Subscription Cancellation.
16. Explain how to use temporary holds.
17. Describe what will cause a penalty.
18. Add “unpaved areas or paths” (Version 4 of Application for Paratransit Eligibility Certification, Part 3, in question 6).
19. Identify the following planned improvements (2.7. Multi-Year Budget).
20. Hire additional full-time Bus Operators.
21. Replace nine RTS Access buses.
22. Continue to improve the RTS Access infrastructure.
23. Ongoing work to secure state funding for transit improvements.

Suggestions

RTS Access suggests that, after the finalization and approval of the Paratransit Plan, RGRTA evaluates and considers the feasibility of including these improvements in future operational initiatives:

1. Improve accessibility of the paratransit customer surveys (Customer Questionnaire) and forms that are more likely to be used by people with disabilities.
2. Develop a Complementary Paratransit Rider’s Handbook.
3. Develop a list of Frequently Asked Questions about the current “hot” topics for paratransit users.
4. Train Schedulers on the Match and Batch function in Trapeze (scheduling software).
5. Identify a model of reservation service that balances compliance and operational costs with efficiency and customer satisfaction.
6. Explore options that increase the customers’ ability to cancel trips they no longer need in a timely way and in a more accessible manner.
7. Evaluate the advisability of implementing a process for recurring door-to-door reasonable modification requests.
8. Hold information and education sessions about paratransit topics.

RTS Access Response to Public Comments (2017-2018)

Response Time (Trip Reservations)

Joseph Santacesaria, Ericka Jones, Leslie Hulbert, Paula Mathews, Lawrence Nichols, Teresa Rand, and Rene Latorre commented about trip reservations.

RTS Access instructs the Schedulers to follow the FTA rules about trip reservations and audits phone calls. You can find tips for booking trips at [Calling-RTS-Access](https://www.myrts.com/RTS-Access/Calling-RTS-Access).

If you believe the rules are not being followed, please use [Contact-Us](https://www.myrts.com/Contact-Us) or call 585-288-1700 to express your concern. Office hours are Monday through Friday, 8:00 AM to 5:00 PM.

You can give feedback through customer surveys that RTS Access mails monthly.

RTS Access must ensure that you are able to reserve trips according to the FTA rules for providing paratransit transportation in compliance with ADA. RTS Access must provide a reservation service for scheduling trips during administrative office hours and at least 1 day in advance. That is why the RTS Access Scheduling office is open from 8:00 AM to 5:00 PM every day.

Mr. Joseph Santacesaria and Ms. Ericka Jones asked RTS Access to extend Scheduling hours beyond 5:00 PM. Staff retention is a common challenge for employers, and RTS Access is no exception. RTS Access must first ensure that enough Schedulers are available from 8:00 AM to 5:00 PM each day. For 2018-2019, the scheduling office hours will remain as stated in the Plan.

Mr. Joseph Santacesaria mentioned advance reservations. RTS Access wants to assure all customers that this is an option, not a requirement. If there is space on the bus, you can book a trip for a time later the same day. RTS Access provides the ability for you to book your trip one or more days in advance. You have the option to reserve trips up to seven days in advance. RTS Access will clarify the description of advance reservations in the Paratransit Plan.

Ms. Ericka Jones pointed out that the Paratransit Plan incorrectly states that Schedulers or Dispatchers will book rides. RTS Access will correct the description. The Dispatchers’ primary job is to support bus operations. During Scheduling office hours, they will transfer trip requests to Scheduling. Dispatchers will schedule same-day trips when the Scheduling office is closed. To reduce hold times for those who are scheduling trips, please use the phone lines designated for other types of calls. You can find these phone numbers at [Calling-RTS-Access](https://www.myrts.com/RTS-Access/Calling-RTS-Access).

Ms. Leslie Hulbert expressed frustration at the lack of trip reservation technology. RTS Access suggests that RGRTA consider assessing the reservation service model as part of a future operational initiative.

RTS Access Bus Operators are trained to follow the rules about pickup periods. If you believe these rules are not being followed, please notify RTS Access. A pickup period is the window of time for the bus to arrive. According to the FTA rules, a typical pickup period is between 20 to 30 minutes. The pickup period starts 10 minutes before the scheduled time and ends 10 minutes after the scheduled time. The FTA acknowledges that waiting 5 minutes after arrival is a common practice among transit agencies. The Paratransit Plan states that if the Bus Operator arrives early, the Bus Operator must wait until the pickup period starts and then must wait 5 minutes for the customer before continuing to the next pickup.

Ms. Ericka Jones and Ms. Teresa Rand expressed concern about Bus Operators starting the 5 minutes before the pickup period. RTS Access encourages any paratransit customers who experience this problem to tell RTS Access about it as soon as possible. RTS Access trains the Bus Operators to follow the process described in the Paratransit Plan and wants to ensure that they are able to deliver service properly. When RTS Access schedules the ride, RTS Access expects customers to be ready within the pickup window. This allows RTS Access to serve the hundreds of people with disabilities who need a ride that day. If the bus arrives early, it is the Bus Operator’s responsibility to wait until the pickup window starts before counting down the 5 minutes.

Ms. Ericka Jones asked RTS Access to increase the wait time to 10 minutes. Paratransit is a shared ride service. Unless RTS Access increases the number of paratransit buses and Bus Operators, a 10-minute wait period will prolong the wait time for everyone. The FTA considers the 5-minute wait time acceptable and RTS Access will continue to use it.

Ms. Paula Mathews expressed concern that the pickup period and 5-minute waiting period are not comparable to fixed route service. The FTA rules acknowledge that a pickup period of between 20-30 minutes and a 5-minute waiting period are acceptable practices in providing comparable paratransit service. RTS Access will continue to use the established pickup period and wait time.

Mr. Lawrence Nichols acknowledged that Schedulers perform a “monumental” task, but also noted inefficient scheduling practices. RTS Access suggests that RGRTA consider a future operational initiative to offer Schedulers specialized training on a function in the Scheduling software system. In time, consistently applying that new functionality could optimize trip efficiency.

Ms. Paula Mathews and Ms. Ericka Jones expressed concern about the requirement for customers to stay an hour at a destination, especially when the purpose of the trip is to perform a brief errand. The FTA guidance acknowledges that transit agencies may separate two trip requests by 60 minutes and, in some instances, 90 minutes. Every trip involves a pickup time, pickup window, and travel time. Holding the bus 15 minutes at a destination for one customer to perform an errand may interfere with another customer’s pickup time. The FTA rules prohibit RTS Access from prioritizing one type of trip over another (excluding subscription trips). RTS Access must schedule and operate consistently, regardless of whether a round trip is for filling a prescription at a pharmacy or for attending a concert. RTS Access will continue to remind and train Schedulers and Bus Operators to space trips for the same person by a minimum of one hour.

Ms. Rene Latorre pointed out that hold times on the phone and the professionalism of customer service have improved since 2014. RTS Access appreciates the compliment and encourages all customers to share compliments and concerns through the online form or by phone.

Operational Policies & Procedures

Heather Bird, Bernice Bird, Louise Morales, Ericka Jones, Louis Kline, and Rene Latorre commented about policies and procedures.

The Paratransit Plan includes operational policies to help RTS Access follow the FTA and DOT ADA rules for providing paratransit transportation.

Changes in management can contribute to inconsistency and confusion for staff and customers. After the Board approves a finalized Paratransit Plan, RTS Access will use the Plan as a resource for compliance with FTA regulations for providing complementary paratransit. RTS Access asks for your patience during the completion of the Paratransit Plan and the process of educating employees.

After the new Paratransit Plan is in effect, if you believe RTS Access is not providing complementary paratransit service according to the approved policies, please notify RTS Access through Contact-Us, or call 585-288-1700 and tell the Representative about your concern. Office hours are Monday through Friday, 8 AM to 5 PM.

Because of Ms. Heather Bird and Ms. Bernice Bird’s comments, RTS Access will add the following information about children and service animals to the Paratransit Plan.

1. You have the right to bring one “accompanying companion” on your paratransit trip. The accompanying companion must travel the same trip; beginning at your origin and ending at your destination. You have the right to bring one child as your companion. You can bring more children if space is available and they do not displace other eligible riders with reserved trips.
2. You have the right to travel with one personal care attendant (PCA) who assists you with a daily life activity. The PCA must travel from the same origin and to the same destination as you. According to the FTA, a friend or family member is only a PCA if you regularly make use of a PCA and the friend or family member is actually acting to assist you with your personal needs.
3. If you bring a PCA on your trip, you still have the right to bring one child as your accompanying companion. If there is space, you can bring additional children. Please consider that other customers may have PCAs or companions too. RTS Access recommends telling the Scheduler when you will travel with multiple children. This will ensure your trip includes your full group and does not infringe on the rights of other customers.
4. Mrs. Louise Morales expressed that she needs her great-granddaughter to assist her occasionally. RTS Access realizes that sometimes children act as PCAs. If this is the case for you, RTS Access recommends that you tell the Scheduler.
5. Some paratransit rides are booked on sedans. New York State law requires that children under the age of four ride in child safety seats and that all children ride in child safety restraint systems until their 8th birthday ([dmv.ny.gov](https://dmv.ny.gov/more-info/safety-restraints)). For safety, RTS Access will not transport children in sedans if they are younger than 8 years and/or are physically smaller than recommended. The child must weigh at least 80 pounds and measure 4 feet, 9 inches in height.
6. You have the right to travel with your PCA, companion, service animal(s), and mobility device(s), and assistive device(s) according to your needs. When you book a ride, RTS Access Schedulers may ask if you will travel with a companion, a PCA, a service animal, or a device. Your answers will help the Schedulers to book a trip on a vehicle best suited for all the components to which you are entitled, especially during busy times of the day.
7. You have the right to travel with your service animal. You or your PCA are responsible for keeping the service animal under your control at all times. The service animal must not block the aisle and must not pose a direct threat to the health and safety of others. During Scheduling, RTS Access may ask if you intend to ride with a service animal to ensure adequate space is available for the animal. The FTA guidance acknowledges that this practice is acceptable.

Ms. Ericka Jones listed ADA rules on accessibility for fixed route service. They included priority seating, seat belts, securements, and wheelchair brakes. RTS trains RTS Bus Operators on the ADA rules. RTS will continue to use training for fixed route service that covers the following responsibilities:

1. It is the Bus Operator’s responsibility to ask the person without a disability to move from a priority seat. It the person’s decision whether to move. The Bus Operator is not responsible for compelling another person to move.
2. It is the Bus Operator’s responsibility to verify that securement and release of a mobility device is performed properly for the safety of all.
3. It is the Bus Operator’s responsibility to provide transportation to wheelchair users even if the device does not have brakes or if the user does not choose to set the brakes.
4. Bus Operators must not apply the vehicle seatbelt to people in mobility devices if they decline or if the mobility device cannot be secured adequately to the satisfaction of both parties.

New York State and the federal government may audit RTS operations. At any time, if you believe these rules are not being applied properly on fixed route service, notify RTS through [Contact-Us](https://www.myrts.com/Contact-Us) or call 585-288-1700 and tell the Representative about your concern.

Office hours are Monday through Friday, 8:00 AM to 5:00 PM. You can find the process for filing an ADA complaint at [Riders-Guide/ADA-Compliance](https://www.myrts.com/Riders-Guide/ADA-Compliance).

Mrs. Louise Morales asked for the rule on shopping carts. RTS Access must ensure room for customers to travel with the mobility devices they need. Wheelchairs, canes, crutches, or walkers are mobility devices. You can place a shopping cart in areas only if other riders who use mobility devices do not need to use those areas. Shopping carts, bicycles, and skateboards are not intended to serve primarily as mobility devices. RTS Access does not consider a shopping cart to be a mobility device.

Ms. Heather Bird pointed out inconsistency in trip locations. The Paratransit Plan includes a communication process about service changes. If a change to a specific fixed route affects the paratransit service or trips, RTS Access will send written notice to all customers in an accessible format. The process will go into effect after the Paratransit Plan is finalized and approved.

Mr. Louis Kline expressed concern about the comparability of paratransit service to fixed route service. To be comparable to RTS in Monroe County, RTS Access must meet the requirements in [Part 37 — Transportation Services for Individuals with Disabilities](https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/ada-regulations) (§§37.123-37.133 in Subpart F — Paratransit as a Complement to Fixed Route Service). RTS Access bases the Paratransit Plan entirely on those requirements. RTS Access will use the final Paratransit Plan as a resource to monitor RTS Access compliance with the requirements for comparability.

Ms. Rene Latorre raised concerns about the Paratransit Trip Subscriptions policy. RTS Access describes the revisions to the policy in the response about Trip Subscriptions. The revised policy will not go into effect until after the Board of Commissioners approves the Paratransit Plan. Then, management will determine an appropriate time to implement the revisions. Meanwhile, Schedulers will apply current practices and rules to Subscriptions. RTS Access realizes this is a confusing situation and is eager to finalize the Paratransit Plan so that the rules are clear for everyone.

No-Shows, Late Cancellations, and Suspensions

Ericka Jones, Louis Kline, Rene Latorre, Chris Louden, Paula Mathews, and Lawrence Nichols commented about no-shows.

The Paratransit Plan includes a policy on no-shows, late cancellations, and service suspensions to deter people from habitually and deliberately missing their scheduled trips.

RTS Access expects customers to use their scheduled trips. If you do not need your trip, RTS Access expects you to cancel it in advance, just as you would cancel a medical appointment. Unexpected situations may cause you to miss trips unintentionally or force you to cancel at the last minute. RTS Access expects you to call and explain the situation so that you do not receive a no-show.

Ms. Ericka Jones, Mr. Lawrence Nichols, Mr. Louis Kline, and Mr. Chris Louden asked what happens if they miss a trip for reasons outside their control. The last page of the proposed Paratransit No-Shows and Service Suspensions policy reads, “RTS Access will not count a missed trip as a Single No-show if a customer misses a trip for a reason outside his or her control. Example: medical or family emergency, a pickup scheduled at the wrong location, or a situation where the Bus Operator did not follow the rules for pickup.” RTS Access will move the sentence to the Overview of the policy.

This rule is like a school attendance policy. If you miss class but provide a reason (such as illness or medical appointment), the school will excuse your absence. Similarly, RTS Access will excuse missed trips due situations that you cannot control. If you have a sudden conflict that will prevent you from taking your trip, call 585-654-0647 before your pick up. RTS Access will not count the late cancellation. If you are unable to call before your pickup, notify RTS Access at a suitable time. RTS Access will excuse the missed trip. If RTS Access schedules a ride incorrectly or if the Bus Operator arrives at the wrong location, RTS Access will not penalize you. It is the Bus Operator’s responsibility to apply the pickup period correctly.

If you believe you received a no-show or a notice of suspension due to reasons beyond your control or due to scheduling or operations error, please contact RTS Access immediately. You have the right to appeal a suspension within 14 days from the date in the suspension notice. The appeal procedures will be included with the suspension notice.

Mr. Louis Kline objected to equating late cancellations with no-shows. The FTA permits transit providers to count late cancellations as no-shows for trips cancelled less than two hours prior to the pickup window if the cancellation is not due to reasons beyond the customer’s control. This provision will remain in the policy.

If you cancel your trip in advance, RTS Access will not count the unused trip as a no-show. Cancel your reservation at least two hours or more before the pickup window starts. Cancel a Subscription trip at least eight days ahead of the date of the trip.

If you plan a vacation or your school or facility has planned periods of recess, you can put a temporary hold on your Subscription for those days instead of cancelling your Subscription trips.

Ms. Paula Mathews asked if RTS Access tracks trips throughout a calendar year. RTS Access tracks missed trips for each month during the calendar year. Everyone will start the calendar year on January 1 with a “clean slate” — zero missed trips, zero no-shows, and zero suspensions. You will start each new month with zero missed trips. Any trips you miss during the month will not carry over to the next month. However, No-Show Violations can accrue over the course of the remaining months until the last day of the calendar year (December 31).

Mr. Louis Kline, Ms. Rene Latorre, and Mr. Chris Louden expressed concern about the 5% threshold for calculating no-shows. The FTA guidance and RTS Access system-wide data support the 5% threshold. If you would like to understand more about the FTA guidance, RTS Access invites you to read the [FTA Americans with Disabilities Act Guidance](https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/americans-disabilities-act-guidance-pdf) (refer to sections “9.12 No-Show Suspensions” and “Attachment 9-4 Sample No-Show Policy”).

At the close of each month, RTS Access will evaluate actual usage of the customer’s reserved trips during that month. RTS Access will update the policy to explain specific exclusions. RTS Access will exclude:

1. Any missed trip that RTS Access excused (missed due to a reason beyond the customer’s control); and
2. Individual trips that the customer cancels two or more hours in advance of the scheduled pick up window; and
3. Subscription trips that the customer cancels eight or more days in advance of the trip date; and
4. Subscription trips that the customer puts “on hold” eight or more days in advance of the trip date.

If, after these exclusions, RTS Access records indicate that for 5% or more of the trips for the month the customer 1) did not show up, or 2) cancelled them late, or 3) a combination of both, RTS Access will apply penalties as defined in the policy for No-Shows and Service Suspensions.

It is your responsibility as a customer to cancel a trip in advance when it is in your control to do so. Call 585-224-8529 anytime to leave a cancellation message. When it is not in your control to cancel, you still have a responsibility to inform RTS Access about the situation that prevented you from taking your trip. Please call 585-654-0647 or send a message through the Contact Us form at [Contact-Us](https://www.myrts.com/Contact-Us). It is the responsibility of RTS Access to track your trip usage properly and to correct errors in service delivery. The policy on No-Shows and Service Suspensions communicates the rules and establishes a reasonable expectation that a deliberate disregard for the rules will result in consequences.

Service Area

Joseph Santacesaria, Scott Davis, Heather Bird, Paula Mathews, Lawrence Nichols, and Rene Latorre commented about the paratransit service area.

The Paratransit Plan describes the current paratransit service area as required by the FTA and DOT ADA rules.

Mr. Lawrence Nichols wanted to understand why the RTS fixed route service area determines the RTS Access service area. The RTS fixed route service area outlines the geographic borders in Monroe County containing active bus routes. The FTA rules require all transit agencies that provide fixed route service to provide complementary paratransit service for people who certify as eligible for paratransit. The complementary paratransit service area must cover the same geographic area and serve the same origins and destinations as fixed route service area.

The Paratransit Plan includes a process for communicating changes about complementary paratransit service. If a change to fixed route service affects the paratransit service or trips, RTS Access will send written notice to all customers in an accessible format.

At this time, RTS Access will not perform any immediate changes to the current paratransit service area. RTS Access asks RGRTA to consider the following comments during future service planning discussions:

Mr. Scott Davis asked for paratransit service to get to work, home, church, and hockey games. He asked for service to Finger Lakes Racetrack. Mr. Joseph Santacesaria asked for a wider paratransit service area. Ms. Heather Bird noted inconsistencies with trips to East View Mall. Ms. Paula Mathews noted that RTS provides service to the JCC and Jewish Home but RTS Access does not. Ms. Rene Latorre voiced concern about the underserved populations in areas that had paratransit service in the past, but are currently without service due to fixed route eliminations (Chili, Henrietta, areas of Greece, Hilton/Hamlin, and Webster).

Trip Subscriptions

Rene Latorre, Teresa Rand, Adam Pehur, Angelo Ercolamento, Lawrence Nichols, and Chris Louden commented about Subscription Service.

The Paratransit Plan includes a Paratransit Trip Subscriptions policy. The FTA rules allow transit agencies to 1) provide Subscription service at their discretion, and 2) use waiting lists, capacity constraints, trip purpose restrictions, or priorities for participation in the subscription service. However, the rules establish that Subscription service cannot absorb more than 50% of the number of trips available at a given time of day unless there is non-subscription capacity.

Ms. Rene Latorre, Ms. Teresa Rand, Mr. Adam Pehur, Mr. Angelo Ercolamento, Mr. Lawrence Nichols, and Mr. Chris Louden expressed one or more of the following concerns:

1. The criteria for qualifying for a Subscription is unrealistic;
2. The policy does not make allowances for illness or situations outside the customer’s control;
3. The policy does not make allowances for vacations; and
4. The 5% threshold for monitoring advance cancellations is too strict.

RTS Access will amend the criteria to include trip purpose (a consistent work schedule, regular medical treatment such as dialysis, or routine day treatment or rehabilitation program). The trips must have 1) the same origin and destination, and 2) the same pick up or drop-off time, and 3) occur on the same day(s) of the week. If you volunteer or work for an organization three times a week but your schedule changes every month, a Subscription trip is not appropriate due to the variability of your schedule.

RTS Access will adjust the criterion for reliability. RTS Access needs to establish a pattern of responsible ridership before providing a Subscription. The proposed policy required zero No-Shows, Cancellations, or Service Suspensions for six consecutive months. RTS Access will amend the policy to allow customers with no more than one Service Suspension during a consecutive six-month period to qualify for a Subscription.

Unexpected situations may cause you to miss a Subscription trip unintentionally or force you to cancel at the last minute. RTS Access will excuse trips missed due to unforeseen circumstances or due to operating/scheduling error. In Subsection 1.3 of the policy, RTS Access will add the following: “RTS Access will excuse situations when you miss or cancel a trip due to a reason outside your control. Before your pick up window begins, call 585-654-0647 and explain your situation. If your situation is so urgent that you are unable to call before your pickup, please call at a suitable time.”

Subsection 1.5 of the policy explains a Subscription hold. If you put a Subscription “on hold,” you can stop using it temporarily without any penalty. Vacations are an appropriate situation for putting a subscription on hold. Another example is a planned school recess. The minimum hold is one calendar day and the maximum hold is three calendar months. It is your responsibility to arrange a hold period (a date to start the hold and a date to resume the trips). After your hold period is over, RTS Access expects you to resume your Subscription trips as usual. RTS Access will amend the policy to explain how to request a hold before you go on vacation. Subscription trips load into the scheduling system seven days ahead of the trip date. For this reason, please request your hold at least eight days in advance of when you will leave for vacation.

Cancellations cause scheduling issues because Subscription trips load into the scheduling system seven days ahead of the trip date. Even if you cancel your Subscription trip a few days in advance, RTS Access is unable to use that trip for another customer. Whenever possible, notify RTS Access at least eight days ahead of time if you cannot use your Subscription trip.

RTS Access will revise the policy to define an Advance Subscription Cancellation as a cancellation made eight or more days in advance of the date of the Subscription trip. A Late Subscription Cancellation will be a cancellation made seven or fewer days before the date of the Subscription trip.

The policy originally proposed a 5% threshold to monitor advance cancellations on subscription trips over a three-month period. After considering the comments from Ms. Rene Latorre, Ms. Teresa Rand, Mr. Adam Pehur, Mr. Angelo Ercolamento, Mr. Lawrence Nichols, and Mr. Chris Louden, RTS Access will revise the policy to convey the following information:

RTS Access expects customers to use their Subscription trips responsibly. If RTS Access identifies a pattern of absenteeism, RTS Access will review Subscription trip usage. In some situations, RTS Access may find that a Subscription is not a good fit for your work or program schedule.

At the close of each month, RTS Access will evaluate actual usage of all your reserved trips during that month. RTS Access will exclude:

1. Any missed trip that RTS Access excused (missed due to a reason beyond your control); and
2. Individual trips that you cancel two or more hours in advance of the scheduled pick up window; and
3. Subscription trips that you cancel eight or more days in advance of the trip date; and
4. Subscription trips that you put “on hold” eight or more days in advance of the trip date.

If, after these exclusions, RTS Access records indicate that for 5% or more of your trips, you 1) did not show up, or 2) cancelled them late, or 3) a combination of both, RTS Access will apply penalties. RTS Access defines the penalties in the policy for No-Shows and Service Suspensions. RTS Access will notify you about the penalty and the appeal process in an accessible format.

Accessible Formats

Ericka Jones, Justin Young, Rene Latorre, Heather Bird, Paula Mathews, and Lawrence Nichols commented about accessible formats.

The ADA rules require RTS Access to communicate information in formats that a person with a disability can use (accessible format). During the Public Hearing on Nov. 28, 2017, Ms. Heather Bird, Ms. Paula Mathews, and Ms. Rene Latorre informed RTS Access that the proposed Paratransit Plan was not accessible for people who are blind or have low vision.

RTS Access contacted the Center for Disability Rights (CDR) and Association for the Blind and Visually Impaired (ABVI) for guidance. Ms. Rene Latorre, Mr. Angelo Ercolamento, Ms. Ericka Jones, and Mr. Justin Young provided valuable input. On Dec. 07, 2017, RTS Access posted accessible files at [Paratransit-Plan-Update-Accessible](https://www.myrts.com/RTS-Access/Paratransit-Plan-Updates/Paratransit-Plan-Update-Accessible).

The files are compatible with screen-reader software. RTS Access posted an HTML version of the Eligibility Application to allow a low vision or blind person to get a better sense of the application flow. RTS Access embossed two braille documents. RTS Access delivered one to Ms. Rene Latorre at the ABVI facility and one to Ms. Heather Bird, who is President of the National Federation of the Blind of Rochester.

RTS Access thanks Ms. Rene Latorre, Mr. Angelo Ercolamento, Ms. Ericka Jones, and Mr. Justin Young for their expertise and patience. RTS Access will apply their guidance to make the final Plan accessible. RTS Access will continue to work with Ms. Rene Latorre to improve the quality of braille materials.

Ms. Paula Mathews noticed on Nov. 28, 2017 that the hyperlinks in the proposed Plan did not work. The files RTS Access posted on Dec. 07, 2017 have active hyperlinks. She asked for an extension of the period for comments. RTS Access immediately extended the deadline to Jan. 5, 2018.

Ms. Ericka Jones and Ms. Rene Latorre asked RTS Access to consider customer needs when distributing information about no-shows, suspensions, appeals, eligibility certification, or recertification. They stressed that printed-paper letters are inappropriate for blind or low vision customers who live independently. Mr. Justin Young urged RTS Access to deliver information consistently in the formats people need. Mr. Young explained that he has not received information in the format he selected on his recertification.

RTS Access is able to collect information in a Customer Relationship Management (CRM) system, including when a customer needs an accessible format. RTS Access will include language in the Plan affirming the commitment to use appropriate formats, especially for materials that are time-sensitive such as recertification documents, warning letters, suspension letters, and appeals procedures.

Mr. Lawrence Nichols requested an accessible way to cancel trips from personal computers and smart devices with internet service. RTS Access is suggesting for RGRTA to consider options for cancelling trips in a more accessible manner as part of a future operational initiative. For now, please call 585-224-8529 to leave a cancellation message.

Capacity

Joseph Santacesaria, Teresa Rand, Ericka Jones, Paula Mathews, and Leslie Hulbert commented about capacity.

Sections 2.2.F. and 2.4.F. of the proposed Paratransit Plan outline the practices RTS Access follows to avoid capacity constraints as prohibited under the DOT and FTA regulatory statues. Mr. Joseph Santacesaria suggested more paratransit buses on the road would reduce wait times and assure timely pickups. Similarly, Ms. Leslie Hulbert suggested increased service capacity could help people with disabilities stay employed and involved in their communities.

For 2018-19, RTS Access will hire more Bus Operators. RTS Access will replace nine paratransit buses with newer models. At this time, RTS Access does not plan to add to the existing fleet of 53 buses.

RTS Access suggests for RGRTA to consider a future operational initiative to provide Schedulers with specialized training on a function in the Scheduling software system. In time, consistently applying that new function could help to improve the efficiency of trips.

Ms. Teresa Rand expressed concern about early arrivals. It is the Bus Operator’s responsibility to wait until the pickup window starts before counting down the five minutes. Please call if the Bus Operator departs without you before the pickup window starts. Here is a list of the numbers to use:

1. Dispatch Office 585-654-0675
2. Scheduling Office 585-224-8330, Option 3
3. Cancellations/No-Shows 585-654-0647
4. Operations 585-654-0747

Call the Dispatch Office first. Be ready to provide specific details. Leave a message if necessary. If RTS Access made the error, RTS Access will excuse the missed ride. RTS Access will continue to train RTS Access Bus Operators on the correct procedure, and work with individual RTS Access Bus Operators as necessary.

Ms. Paula Mathews and Ms. Ericka Jones expressed concern about the requirement for customers to stay an hour at a destination, especially when the purpose of the trip is to perform a brief errand. The FTA guidance acknowledges that transit agencies can separate two trip requests by 60 minutes and, in some instances, 90 minutes. Every trip involves a pickup time, pickup window, and travel time. Holding the bus 15 minutes at a destination for one customer to perform an errand may interfere with another customer’s pickup time. The FTA rules prohibit RTS Access from prioritizing one type of trip over another (excluding subscription trips). RTS Access must schedule and operate consistently, regardless of whether a round trip is for filling a prescription at a pharmacy or for attending a concert. RTS Access will continue to remind and train Schedulers and RTS Access Bus Operators to space trips for the same person by a minimum of one hour.

Ms. Ericka Jones questioned the accuracy of the on-time performance data. RTS Access Bus Operators are trained to write the actual pickup times on their paper manifests and to write a note if the GPS system malfunctions. Assigning goals to On-Time Performance and tracking the data is a proven method RTS Access uses for improving the quality of service.

On behalf of CDR, Ms. Ericka Jones recommended giving surveys to all paratransit riders from the last two years. RTS Access would be very pleased for RTS Access customers to rate and comment about on-time performance in the Customer Questionnaire survey. RTS Access mails 100 printed surveys to customers each month. You can return the survey to the Bus Operator or scan it and attach the file to the Contact Us form at [Contact-Us](https://www.myrts.com/Contact-Us). RTS Access suggests for RGRTA to consider exploring options for improving the accessibility of the Customer Questionnaire as a future operational initiative.

Handbook for Riders

Ellyn Prietz, Heather Bird, Bernice Bird, Louise Morales, and Ericka Jones commented about a rider’s handbook.

Ms. Ellyn Prietz, Ms. Heather Bird, Ms. Bernice Bird, Mrs. Louise Morales, and Ms. Ericka Jones expressed their desire to have written communication of rules and policies. At minimum, this document would:

1. Communicate the rules and regulations to new and existing customers regarding use of ADA complementary paratransit transportation; and
2. Summarize policies and service expectations; and
3. Be available in accessible formats.

The proposed Paratransit Plan is a comprehensive resource. It is 144 pages and uses formal language based on the following federal regulations:

“Code of Federal Regulations Title 49 — Transportation, Subtitle A — Office of the Secretary of Transportation, Part 37 — Transportation Services for Individuals with Disabilities (ADA), Subpart F — Paratransit as a Complement to Fixed Route Service”

RTS Access initially concluded that the Paratransit Plan would meet the need for written rules, responsibilities, and policies. Your comments revealed different needs and expectations. For that reason, RTS Access believes that a concise, accurate handbook will fulfill your request for written communication about policies more effectively.

RTS Access suggests that, after the finalization and approval of the Paratransit Plan, RGRTA considers the feasibility of developing a time-line for creating a Complementary Paratransit Rider’s Handbook as a future operational initiative.

Service Animals

Heather Bird, Bernice Bird, Teresa Rand, and Ericka Jones commented about service animals.

The Paratransit Plan includes operational policies to help RTS Access comply with the FTA and DOT ADA rules for providing paratransit transportation. Ms. Heather Bird, Ms. Bernice Bird, and Ms. Ericka Jones’ comments about service dogs resulted in the decision to add the following statements to the Paratransit Plan.

You have the right to travel with your service animal.

During Scheduling, RTS Access may ask if you intend to ride with a service animal. RTS Access will do this to ensure adequate space is available for the animal along with other customers sharing that ride (as well as their accompanying companions, PCAs, and mobility devices). The FTA guidance acknowledges that this practice is acceptable.

The DOT ADA regulations allow a transit provider to ask if the animal is a service animal, or ask what tasks the animal has been trained to perform. The regulations prohibit transit personnel from asking a customer to describe or demonstrate his/her disability or asking for proof of the service animal’s certification or identification.

Ms. Teresa Rand expressed a concern about service dogs in the aisles. RTS Access will include the following information in the Paratransit Plan:

1. Caring for a service animal is the responsibility of the customer or a personal care attendant (PCA). You or your PCA are responsible for keeping the service animal under your control at all times.
2. The service animal must not block the aisle.
3. The service animal must not pose a direct threat to the health and safety of others.

If you have a concern, use [Contact-Us](https://www.myrts.com/Contact-Us) or call 585-288-1700. Office hours are Monday through Friday, 8:00 AM to 5:00 PM.

System Redesign “Reimagine RTS”

Scott Davis, Joseph Santacesaria, and Rene Latorre commented about system redesign.

During the public participation for the Paratransit Plan, RTS Access received comments related to “Reimagine RTS.” The “Reimagine RTS” study will explore how public transit fits with the changing transportation needs in Monroe County. The study is specific to the RTS fixed route system. Currently, the “Reimagine RTS” study is still examining possibilities for the fixed route system design. In the coming months, RTS will provide many opportunities to discuss the study and ideas at public information sessions. You can also submit comments through the Contact Us form at [Contact-Us](https://www.myrts.com/Contact-Us). You can voice your suggestions or concerns by speaking to a Customer Service Representative at 585-288-1700 Monday through Friday, 8:00 AM to 5:00 PM.

Updates are on [Reimagine-RTS/Information-and-Resources](https://www.myrts.com/Reimagine-RTS/Information-and-Resources) and <https://reimagine.myrts.com/>.

The event schedule is available at [Reimagine-RTS-Events](https://www.myrts.com/Reimagine-RTS/Reimagine-RTS-Events) and <https://reimagine.myrts.com/>.

Mr. Scott Davis, Mr. Joseph Santacesaria, and Ms. Rene Latorre expressed a strong desire for a broader paratransit service area. Ms. Rene Latorre expressed concern about the lack of accessibility in the Reimagine RTS Phase 1 electronic survey. RTS Access includes the following summary of public comments here. RTS Access asks RGRTA to consider the summary as part of the Reimagine RTS discussion:

1. Scott Davis “. . . changing the routes would probably make it very hard with Lift Line and very hard to, you know, get rides essentially home from work or to work. It would, you know, make it hard to meet with going out to hockey games, church, those type of things. So we need to keep the stuff the same or the way we have it because it's going to impact, you know, our freedom. So we need to keep it totally the same.”
2. Rene Latorre “. . . . As the Reimagine Project survey focuses on the needs of its customers, it needs to be noted that the needs of the RTS Access riders are not being considered in the same way. We all know that whenever there is a change to RTS fixed route, it will automatically create changes to the service area of RTS Access. For this reason, we are asking that the input of RTS Access riders also be considered with the same weight of RTS Access fixed route writers. To date, the interactive Reimagine survey is so incredibly inaccessible, that there is no possible way for a blind or visually impaired individual to complete the survey independently. We have many blind and/or visually impaired individuals who do rely on RTS fixed route buses for their primary source of transportation. These individuals have equally important input when considering changes to fixed route service.”
3. Joseph Santacesaria “I have read the Reimagine RTS Draft Plan. If RTS expands the service area as proposed, I will be able to visit my family in their homes. This one change will make a positive impact on many people who rely on Paratransit. I'm very pleased and supportive of creating a wider service area. . . . As we reimagine RTS, we need to have a vision where we can make our public transit programs more inclusive where people with and without disabilities can ride together. Where paratransit services are more affordable and there are more options available for people with and without disabilities to access safe, affordable, and readily available transportation. Currently more than 20% of Americans have a disability. With our aging population, these numbers will continue to increase. Transportation impacts every aspect of a person’s life – employment, recreation, access to health care, education, family – I can’t go anywhere without RTS giving me transportation. Please work with members of the disability community to design a system that is accessible, flexible, and available for all people in our region where transportation is no longer a barrier but an opportunity for people with disabilities to enjoy all that our community has to offer.”

Request for Door-to-Door Service

Rene Latorre, Teresa Rand, and Adam Pehur commented about door-to-door service.

Our basic mode for complementary paratransit is demand responsive, origin-to-destination service. RTS Access has a base level of curb-to-curb service, which means RTS Access picks up and drop off riders at the curb closest to their origin/destination. If a customer needs help to reach a destination beyond the curb, the customer can request assistance before or during the ride. Assisting riders beyond the curb is “door-to-door.” A request for door-to-door assistance is a reasonable modification request. The Paratransit Plan provides instructions for making such a request in the section about reasonable modifications.

Ms. Rene Latorre requested that Schedulers remind customers about door-to-door when they schedule a trip. Ms. Teresa Rand asked for an option that would enroll customers in door-to-door service on a continued basis.

Customers can make a reasonable modification request for assistance beyond the curb when they need it in order to use the service. The rules do not require RTS Access Bus Operators to prompt people to make the request.

Door-to-door is not door-through-door. Bus Operators will not assist a customer past the door to the building. Bus Operators will not perform any of the functions of a personal care attendant (PCA) because doing so is a fundamental alteration of the Bus Operator’s function.

The rules make a distinction between providing door-to-door because it enables a customer to use the service and providing door-to-door simply because makes the service more convenient for a customer. RTS Access suggests that, after the finalization of the Paratransit Plan for 2018, RGRTA evaluates the advisability of implementing a process for recurring door-to-door reasonable modification requests as part of a future operational initiative.

Mr. Adam Pehur requested that RTS Access change the base level of service to door-to-door, rather than providing the assistance when requested by those who need it during a particular trip. Such a change is a fundamental alteration to service. Changing the base level of service requires a detailed planning process, which may include steps such as:

1. Evaluating whether RTS Access has capacity to provide the service without unreasonable decreases to on-time performance or unreasonable increases in ride time.
2. Assessing the most likely direct threats to the health and safety of others.
3. Identifying the percentage of riders who require door-to-door in order to use RTS Access paratransit fully for origin-to-destination travel.
4. Projecting operating costs.
5. Proposing the change and the impact to the public.
6. Facilitating public participation and holding a public hearing.
7. Approval from the Board of Commissioners.
8. Training customers and Bus Operators.

RTS Access does not have plans to change the base level of paratransit service. It will remain as described in the Paratransit Plan: curb-to-curb with the option of requesting door-to-door as a reasonable modification.

Eligibility

Ericka Jones, Paula Mathews, and Justin Young commented about eligibility.

Our Paratransit Plan describes the eligibility certification process as required by the FTA and DOT ADA rules.

Ms. Paula Mathews requested clarification on the Application for Paratransit Eligibility Certification, Version 3. Ms. Mathews wondered what part of the application explains whether she is eligible to apply.

RTS Access provides transportation to people with disabilities who certify as eligible for it in accordance with ADA. A completed application is required for assessing eligibility but does not guarantee certification of eligibility. In addition, RTS Access may require an interview and / or a functional assessment to make an accurate eligibility decision. The Paratransit Plan provides the details about the eligibility criteria, the types of eligibility, and the application process (Exhibit 10: Eligibility Certification).

The application provides a list of situations and asks the applicant to indicate what he or she is able to navigate. One of the situations is “RTS bus stops.” Ms. Mathews expressed concern that the list did not include “RTS bus stops located in the grass” or “RTS bus stops without a concrete pad.” She explained that she does not like to get on or off the bus at a stop located in the grass because she could slip.

The list includes “Unpaved paths” as an option. If the applicant is unable to navigate unpaved paths, RTS Access will apply the answer to any unpaved area, including a bus stop without a concrete pad or a bus stop located in the grass. RTS Access will modify the choice to read “Unpaved areas or paths” in Version 4 of the application.

The application includes a Health Care Provider and Verification portion (Part 5). Ms. Ericka Jones asserted that RTS Access should give the medical professional’s opinion/testimony a higher degree of consideration and importance in the eligibility determination.

Part 5 is a required part of the application. The information from a medical professional is very important. However, eligibility for complementary paratransit relates directly to the functional ability of individuals with disabilities to use fixed route transit services. RTS Access does not base eligibility on a diagnosis, type of disability, or use of a mobility device. People with the same diagnosis or disability can have very different functional abilities to use fixed route services.

Mr. Justin Young urged RTS Access to provide information in the appropriate format. It is particularly important for ADA compliance that RTS Access provide information about eligibility in a format that the person can use. The FTA notes the difference between usability and preference. For example, if you prefer an audio recording but you are able to use an electronic text file, it is acceptable for RTS Access to provide you with the text file as an alternate accessible format. RTS Access will use a Customer Relationship Management (CRM) system to track accessible formats customers are able to use. This will help RTS Access to provide the appropriate formats consistently.

If you are unable to use the format, please notify RTS Access.

You can send your request through the Contact Us form at [Contact-Us](https://www.myrts.com/Contact-Us).

During office hours, you can call Customer Service or the ADA Certification Coordinator. Office hours are Monday through Friday, 8 AM to 5 PM.

1. Call 585-288-1700 and give your request to the Representative; or
2. Call 585-224-8330, then press 2, and give your request to the ADA Certification Coordinator.

Overall Communication

Ellyn Prietz, Paula Mathews, and Rene Latorre provided comments on this topic.

RTS Access conducted public participation for the proposed Paratransit Plan according to the FTA rules and the RGRTA Public Participation Plan. RTS Access held Information Sessions on Nov. 14, 2017 and Nov. 16, 2017. RTS Access held a Public Hearing on Nov. 28, 2017. RTS Access advertised the Information Sessions and Public Hearing through the RTS Newsletter (electronic), posters onboard RTS Access buses, and [www.myrts.com](http://www.myrts.com). RTS Access notified the media and published notice in the Democrat & Chronicle newspaper.

Ms. Paula Mathews said she could not find the public comments from the two Information Sessions online for review. The Information Sessions were informal and were not recorded or transcribed. This is in accordance with the RGRTA Public Participation Plan.

A Court Reporter (stenographer) transcribed the Public Hearing. The event was video recorded. The written comments RTS Access received during the Public Hearing’s comment period will be included in the Paratransit Plan and posted on the website [www.myrts.com](http://www.myrts.com). RTS Access will present the record of the Public Hearing to the RGRTA Board of Commissioners before making a decision on the proposed Paratransit Plan. RTS Access will provide a report of all public comments received, responses to the comments, and any suggestions to the Board of Commissioners. RTS Access will post the report to the website [www.myrts.com](http://www.myrts.com).

Ms. Rene Latorre expressed disappointment at the brevity of the Information Sessions, calling the overview “vague.” She noted that the Paratransit Plan is lengthy and detailed. The proposed Paratransit Plan is 144 pages and based on the Code of Federal Regulations Title 49, Part 37, Subpart F. It is a comprehensive collection of RTS Access policies, operational processes, and procedures.

RTS Access intended for the Information Sessions to introduce the changes, make people aware of the Paratransit Plan posted online, and encourage people to read the topics that most interested them. After the Public Hearing, RTS Access responded quickly to improve accessibility and to provide more time to read the Plan. Several participants read a substantial amount of the Paratransit Plan as shown by the details in their comments. The Information Sessions and Public Hearing sparked interest that led people to use the written Paratransit Plan as a resource.

Ms. Ellyn Prietz expressed a desire for better communication from RTS Access to the people. The public participation on the Paratransit Plan has helped RTS Access to identify areas for improving communication. RTS Access will provide follow-up communication about the Paratransit Plan in accessible formats. RTS Access will use data in a Customer Relationship Management system to provide information about eligibility, recertification, no-show warnings, service suspensions, and appeals in formats that are usable and appropriate for the recipient.

The Paratransit Plan includes the RGRTA Public Participation Plan and a proposed process for notifying customers about major service changes. RTS Access suggests that, after the finalization of the Paratransit Plan, RGRTA considers the feasibility of including these activities in future operational initiatives:

1. Develop a time-line for rolling out a Paratransit Rider’s Handbook to summarize the key policies and service expectations in plain, concise language; and
2. Hold information and education sessions about paratransit topics.

Fares

Paula Mathews and Ericka Jones commented about fares.

The Paratransit Plan describes the RTS Access fare structure which complies with §37.131 (c) of the federal regulations. With the exceptions of supplemental-area service and same-day service, complementary paratransit trip fare does not exceed twice the fare charged customers paying full fare for a trip on fixed route (similar length and time of day). RTS Access bases supplemental service area fares on mileage plus $6.00 for each one-way trip. Total cost per trip is determined by the distance traveled. Ms. Paula Mathews expressed concern about the fare structure, saying that making customers on fixed incomes pay “double” the fare is not comparable to RTS fixed route. The fare structure directly complies with the criteria for fares in Section 37.131 of the regulations. Section 37.121 (b) states “To be deemed comparable to fixed route service, a complementary paratransit system shall meet the requirements of Sections 37.123 — 37.133 of this subpart.” Since RTS Access follows Section 37.131, the RTS Access fares meet the requirements and are comparable according to the FTA regulations.

Ms. Ericka Jones requested that RTS Access inform customers about purchasing passes online. She reasoned that purchasing passes on the bus with exact change is difficult and traveling to the main office is inconvenient. The Paratransit Plan states, “Bus passes in the amount of $18 or $20 are available for purchase from any RTS Access Bus Operator, online, by phone, or from the RTS campus at 1372 East Main Street” (2.4.C. Fares). RTS Access will update this section to emphasize the online option and include the website page [Buy-Passes/rts-access](https://www.myrts.com/Buy-Passes/rts-access). RTS Access sends a handout to customers when they are certified or recertified for paratransit; the handout lists the options for purchasing passes.

Ms. Ericka Jones requested an unlimited 30-day pass option for paratransit. At this time, there are no plans to offer such an option. The purchase options shall remain as described in the Paratransit Plan.

Restroom Request

Salena Boyd commented about the denial of her request.

Ms. Salena Boyd informed RTS Access that an RTS Access Bus Operator denied her request to stop the trip so that she could use a restroom. As a result, Management has spoken with all RTS Access Bus Operators to ensure clear understanding of this issue. RTS Access will grant occasional requests when a customer has an urgent need to use a restroom, and will include this language in the Paratransit Plan.

Hours of Service

Ericka Jones commented about hours of service.

RTS Access describes the fixed route hours of service in the proposed Paratransit Plan. However, the description is incorrect.

Ms. Ericka Jones pointed out the error and requested that RTS Access list the actual hours of operation. RTS Access will correct the language to read as follows, “RTS fixed route service runs from 4:51 AM to 1:54 AM on weekdays, from 5:23 AM Saturday morning to 2:48 AM Sunday morning, and from 5:24 AM Sunday morning to 1:59 AM Monday morning” (1.2.G. Days and Hours of Service).

Budget

Ellyn Prietz commented about the budget.

Our Paratransit Plan describes the trend of increased ridership and the Multi-Year Budget.

Ms. Ellyn Prietz referred to the increased demand for trips between fiscal year 2012-13 and fiscal year 2016-17. She expressed concern about the lack of proportionate increase in the RTS Access operating budget and asked how to increase the budget.

RTS Access projects a more stable trend for paratransit demand, and predicts increases of about 3% each year. RTS Access will update the Paratransit Plan to include this forecast. The Board of Commissioners approved a Capital Budget and operating budget for this fiscal year. In fiscal year 2018-19 RTS Access anticipates funding to replace nine of the RTS Access buses, hire additional full-time RTS Access Bus Operators, and continue improving the RTS Access infrastructure.

Investment in public transportation in communities around the country has not matched the increasing requests for service from transit customers. RGRTA is actively committed to advocating for adequate funding to transform service and accelerate improvements to public transportation in upstate New York.

Recently, lawmakers, transit executives, and business leaders joined RTS CEO Bill Carpenter in Albany. They called on the Governor and legislative leaders to support proposed increases in transit funding to keep up with rider demands and accelerate economic growth in communities. While the legislature has proposed welcome increases, there is still work to do to ensure those increased levels of funding are included in the final state budget. RTS and transit systems across the state will continue working to secure the funding to meet the growing needs of customers.

Public Comments

###### Bernice Bird

Bernice Bird is the Chair of an Advocacy Committee. She spoke at the Public Hearing on Nov. 28, 2017. Her comments are about these topics: Handbook for Riders, Operational Policies & Procedures, and Service Animals.

Bernice’s Verbal Comments from the Public Hearing Transcript

“Hello. I have several points I want to continue on with what Heather was saying. We have — and I am the chair of the advocacy committee. We've been trying for at least six months to get a copy of the rider's responsibilities and rights. We were told they would come out in September. It has not come out. We have not received anything. The reason we need this is because when we encounter schedulers and drivers who don't know the law and it seems, on the surface, like, they're making a policy on the spur of the moment. We have nowhere to look back and say: Oh, yeah. That's on Page 10. And it says this, but that doesn't seem like you're interpreting it correctly. There should be a way someone can go to for that interpretation. The other thing is that I was riding — I was the one, and my friend, who encountered the driver who said: Oh, you can't have two dogs on the bus. You should have told them. They would have — I would have to call for a backup if we had a wheelchair. And that's a lot of garbage. We rode numerous times together and I've been to other meetings where there's been eight/ten dogs on the bus and there's no problem at all. So my point is that everyone from top to bottom needs to be educated about what the law is. The last point is, it is illegal to ask someone beforehand if they are traveling with a dog. And we would be glad to send you the law and point it out. We've had people in our group that have been told: You can't take that ride, because there's already a dog on that bus. You have to reschedule. That's just so crazy. And I think they may have changed the policy, but when the cars first came, we were told people with dogs couldn't ride in a car. Although I rode in a car one day and the driver insisted on dropping me off before they got another passenger, because even though my dog was on the floor, not even with his head on the hump. He was directly in front of me minding his own business being quiet and well behaved. We need to do something to fix this so we aren't — we do not be hassled about this.”

“The very last thing is, the driver that I encountered about the dog, she seemed to want to threaten me and say: You know, you're being recorded. I said: Wonderful, because I know I'm right and you're wrong. So I really do hope that someone at Lift Line saw that conversation and listened to it, because I did not appreciate being hassled because I have a dog and there's another dog on the bus. I want policies to be implemented across the line and not have one particular scheduler or driver give me some harebrained policy that no one's ever heard of before.”

###### Heather Bird

Heather Bird is the President of the National Federation of the Blind of Rochester and RTS Access customer. She spoke at the Public Hearing on Nov. 28, 2017. Her comments are about these topics: Service Area, Accessible Formats, Handbook for Riders, Operational Policies & Procedures, and Service Animals.

Heather’s Verbal Comments from the Public Hearing Transcript

“My name is Heather Bird and I'm the President of the National Federation of the Blind of Rochester. And I actually haven't seen this plan. I'm not sure why. I'm not sure where it was posted, but that's neither here nor there. Once the plan is implemented it needs to be available in an accessible website on RGRTA website somewhere. So one thing I want to address is that policies are not clear and they're not applied across the board. For instance, I have two children. I ride with them a lot of the time. I have never had a hassle. I have another friend who also rides with two children. She has been told she can only bring one child. That actually borders on eugenics. They cannot make a policy that someone's biological or legal children cannot accompany them. It needs to be included. I understand you can't bring a bajillion friends with you and have a bunch of guests, but if legally the children are your responsibility, as a parent - they don't restrict, you know, a mom who gets on the RTS city bus with five children. That is her business. I have never had a hassle myself, but I have friends who have been told: We have to send another bus, because we can't have two guide dogs on the same bus. There's not room, but the bus only have two other people.”

“I want to speak about rights and responsibilities. It is the responsibility of the service dog handler to control it. If you're having issues with dogs jumping on people or hanging out in the aisle, you cannot penalize the rest of us with well-behaved dogs by putting restriction on how many dogs can be on the bus. You should take the individuals who are not controlling their dogs and suspend them or restrict their dogs from riding. You absolutely legally can if the dogs are not being controlled properly. I have been to three different guide dog schools and I've had dogs since I was sixteen. We are taught how to transport these dogs. In theory, you can have an entire bus that holds, what, fourteen people, maybe; and, every seat could have two guide dog users with the dog sitting between their feet with no problem at all. If that's not happening, hold the individual riders accountable and don't hassle the rest of us.”

“An example, I know there's a customer that is being transported to East View Mall when other people aren't. I'm sorry. That's not acceptable, because they don't get service or we do along with them. Every person has to be given the same policies. There was something like that. I don't remember the specifics.”

“So what we're basically asking is for a copy of the plan, but also there needs to be a rider handbook, even if it's long. That's our responsibility to read it. We want a long handbook with all the nitty-gritty, including service dog policies and that children can be transported, all these little things. And we want it in an accessible format to new and existing customers.”

###### Salena Boyd

Salena Boyd is an RTS Access customer who spoke at the Public Hearing on Nov. 28, 2017. During a recent ride, the driver refused Ms. Boyd’s request to make a temporary stop to use a restroom. She presented a written letter to Bill Carpenter at the public hearing. Her comments focus on this experience and fall into the topic of Restroom Request.

Salena’s Verbal Comments from the Public Hearing Transcript

“Here. Salena Boyd, 51 Phelps Avenue, Rochester, New York. Ms. Morales has been my friend for over thirty years, but what she failed to tell you is that she was viciously attacked by a pregnant woman who paid for one seat while her child took up another one and the child's book bag took up another one. And when she tried to access the seat with the book bag, the woman came from a strange place with her and knocked her down and Ms. Morales went into an asthma attack and the asthma attack went from a pneumonia and she has been three months now struggling, trying to get over what happened to her on the bus.”

“Now, as for Salena Boyd, on October 30, 2017, at approximately 3:13 p.m., an RTS driver picked me up at the Unity Building, 2655 Ridgeway Avenue, Greece. And I was his first pick up. He proceeded to pick up and drop off six people. When I go there it is for therapy. I drink a lot of water. I needed to use the bathroom. He refused to allow me to. This is very embarrassing, people, but I had to urinate on myself because the driver refused to allow me to stop his bus. And we picked up a passenger that came out of a building and he heard me plead. On three occasions I made a request of this driver: Can I use the bathroom? I didn't expect him to go off route, but right on route he could have allowed me to run into the building, because that's what the blind gentleman said to him. She could go inside my building. He said: No, I'm late.”

“So, Mr. Carpenter, I have sent this letter to you. I have not received anything back from you. And it is signed here. And before you leave I would like to hand this letter to you that there has been no response to. Thank you very much.”

###### Scott Davis

Scott Davis is an RTS and RTS Access customer who spoke at the Public Hearing on Nov. 28, 2017. He commented about the Service Area and System Redesign (Reimagine RTS).

Scott’s Verbal Comments from the Public Hearing Transcript

“First of all, good afternoon or good evening everybody. Hope all is well. Now, I am a Lift Line user, but I'm also an RTS user as well. I use RTS because I'm a deacon at the Lutheran church, a lay deacon. And, you know, changing the routes would probably make it very hard with Lift Line and very hard to, you know, get rides essentially home from work or to work. It would, you know, make it hard to meet with going out to hockey games, church, and those type of things. So we need to keep the stuff the same or the way we have it because it's going to impact, you know, our freedom. So we need to keep it totally the same. We also need -- but we need RTS service. I understand that. It was bought out by RTS and I suggested millions of times that they go to Finger Lakes Racetracks, which is just no more than five minutes away from East View Mall. So if they go to East View, they should just go down Route 96 another five minutes to Finger Lakes Racetrack. You know what I mean? Because I do go to Finger Lakes once or twice a year and I am somewhat successful. That's why I'm thinking that you need to keep it the way it is.”

###### Angelo Ercolamento

Angelo Ercolamento is an RTS Access customer who submitted a written letter through Contact Us (CRM). Angelo works with The Association for the Blind and Visually Impaired. He assisted RTS with the development of the online application and with making the Paratransit Plan materials more accessible for blind or low vision persons who use screen readers. His comments are about Trip Subscriptions.

Angelo’s Written Comments

Dear Board of Commissioners:

My name is Angelo Ercolamento, I have been a user of RTS Access for over 15 years, and the direction that the new plan proposal is going in is very concerning. After reviewing the paratransit plan update, I would like to submit the following comments and concerns regarding the proposed changes. “

First regarding: EXHIBIT 3: SUBSCRIPTION SERVICE

I do have questions and concerns regarding section 6.2. Repeatedly Cancelling Trips If you count rides that are missed whether it’s vacation, sick days, days our agency is closed, or a Doctor’s appointment for yourself and/or for a child etc. as part of the total percentage and we can miss no more than 5% per month, I can’t imagine how anyone will ever obtain or retain permanent subscription ridership.

I do understand the need to ensure the cancelled ride can be utilized by another rider, but with appropriate notification of a day in which a permanent ride would not be utilized because of a vacation day for example, there would be time for another rider to take that time slot. In short, I am perplexed why a regular rider, i.e. a subscription passenger is not afforded the same courtesy as a non-subscription rider when asking for an advance cancelation. I have actually experienced firsthand the ride I just cancelled being taken by someone else while I was still on the phone with the Customer Service representative, so advance cancelation can and does work.

All that said, I feel that this policy of missing no more than 5% per month of your permanent riders needs to be re-examined. I certainly do not take issue with the last minute late cancellations and no-show rides that cannot be filled by someone else, but to have nothing in place for your subscription riders for those times when someone is sick or needs to take vacation time etc., this policy is unreasonable and needs to be reevaluated.

I remember someone high-up in RTS Access once told me that permanent rides are preferable because it makes less work for your schedulers and less hold time for passengers. If you know where riders are going every day (especially for work), it makes it that much easier for your staff, reducing calls, time on the phones, etc. I would challenge you or anyone else in the working world to never miss more than 5% of rides per month if they include all vacation time, sick time, bad weather and time off to take care of sick children, etc. Life requires some flexibility and even you would be hard pressed to never miss more than 5% of days especially when you factor in half days requiring cancellation of one side of the ride. You never take days or half days off or leave early??

Thank you in advance for your consideration.

###### Leslie Hulbert

Leslie Hulbert is the mother of an RTS Access customer. She spoke on her son’s behalf at the Public Hearing on Nov. 28, 2017. Her comments are about Response Time (Trip Reservations) and Capacity.

Leslie’s Verbal Comments from the Public Hearing Transcript

“Hi. I'm Leslie Hulbert. I want to start out by thanking everyone who shared their concerns tonight because I agree with all of them. So thank you to all who have come.”

“I'm the mom of a 31-year-old son with a developmental disability and he, like many people, is trying to be employed in the community and transportation is the Number 1 obstacle for people with disabilities to be employed. So I really do support increasing the service capacity, but I think that probably more needs to be done around that. So I wanted to certainly make that strong call for really looking how we can help people with disabilities be employed and be more involved in their community.”

“The secondary that has been very frustrating is that we're not able to schedule a ride online. We have to call and I have been on the phone more than once for forty minutes trying to get through to an operator. It's just totally frustrating. It's clearly not acceptable, because individuals who have difficulty with articulation or with any other reason that they would not be able to use their voice to schedule a ride. I just don't see how that meets the FDA guidelines of accessibility. I very much like that both options be available, both being able to schedule a ride online, as well as being able to do it with voice. Thank you.”

###### Ericka Jones

Ericka Jones is a Systems Advocate with the Center for Disability Rights as well as an RTS Access customer. Ericka spoke at the Public Hearing on Nov. 28, 2017. She also submitted a written letter at the Public Hearing. Her comments are about these topics: Response Time (Trip Reservations), Capacity, Hours of Service, Accessible Formats, Handbook for Riders, Operational Policies & Procedures, Service Animals, No-Shows, Late Cancellations, and Suspensions, Eligibility, and Fares.

Ericka’s Verbal Comments from the Public Hearing Transcript

“I'm speaking on behalf of not only myself, but also the Center for Disability Rights. We just had a few thoughts. First of all, there should be longer service and less time waiting for a ride. So, for instance, if someone wants to go to the store they should have the freedom to do that. That might take less than thirty minutes and then we're told we have to wait an hour for a ride to come get us, at the very minimum. That means another thirty minutes of waiting in a possibly unsafe area. So that is a concern of ours. Also, we would like to see the hours of operation for the scheduling office to increase just slightly for those of us that work nine to five. If the office closes right at five o'clock that kind of puts us in a situation where we're expected then to wait for a ride. If something happens, we have no one to call after five o'clock. And then we would like to see the rights and responsibilities of the riders available to all passengers. We've noticed that a lot of communication is paper and that is not accessible to everyone. And so we would like to see alternative formats, like, large print Braille or audio CD, electronic format, different ways of communicating with your riders. That also goes for disseminating information for the appeals process or service suspensions or no-shows. If you're sending that information in the mail and the person can't read or is unable to read a paper format, they're not getting the information, they're not knowing why they are being suspended. Also, we were curious as to what will happen if the fault is on the driver as far suspensions go. It could be that someone is suspended for weeks that it wasn't their fault. How the appeal process is going to go for them and how do they get that info? Also, medical professionals, if it's required in the application to have them fill out a portion of it, their opinion should weigh much larger than what it does, because they have to form relationships with your doctors. So they have to know you pretty well.”

Ericka’s Written Comments

Center for Disability Rights, Inc. Nov. 28, 2017

The Center for Disability Rights (CDR) is a disability-led, not-for-profit corporation, which provides services to people with disabilities and seniors, and promotes independence for people living with all types of disabilities by advocating for full access and integration to our communities. Accessible transportation is crucial for disabled people as it grants us access to employment opportunities, social engagements, and other invaluable experiences.

CDR is happy to have the opportunity to provide the feedback to help promote equal access for people with disabilities as paratransit is an important part of our lives.

RTS policies should allow for longer service and less time waiting for a ride. This report indicates that callers can request rides with RTS Access staff (Schedulers or Dispatchers). It has been reported however that Dispatchers are transferring calls to Schedulers to request rides forcing the caller to wait on hold longer. CDR recommends that Dispatchers be allowed to schedule rides as is noted in the Paratransit Plan. Furthermore, the Scheduling office must expand its hours of operation beyond 5pm to meet the needs of passengers who work from 9am-5pm. If RTS Access surveyed all riders, they would find this is a point of frustration, and keeping the office open longer would reduce this frustration. Requiring riders to stay at their drop off destination for a minimum of one hour is unacceptable when riders may be performing chores that take less than 30 minutes to complete (example: dropping off a rent check or picking up milk from the store). Removing this requirement would increase ridership and also the independence of disabled people.

RGRTA must make rights and responsibilities of riders available to all passengers. In order to make the service fully inclusive, disabled people must be aware of their rights as far as ridership goes. Submitting written documents via USPS is not adequate because it is not accessible to all riders nor is it timely. CDR recommends that RGRTA submit these documents in a written AND alternate format (for example, large print braille, audio CD, electronic format).

RTS must create and disseminate information an appeal process for service suspensions and “No-shows.” It is currently an issue for the riders of RTS Access that when a ride is missed, they are given warnings via USPS up to 10 missed rides within a six month period. Then the rider is subject to a 2-week service suspension. This does not take into account instances where the fault is not on the rider. It has been reported that warnings have been given to riders when the driver has arrived at the location early, waited the five-minute window and then left before the 20-minute window given to the rider has begun. When the notifications of a missed ride come, they are in a paper format that comes in the mail which may be inaccessible to some riders. CDR recommends that RTS send this information in an alternate format and create an opportunity for riders to appeal the suspensions. Also, CDR further recommends that the wait time for the drivers before they leave to be increased from 5 minutes to 10 minutes. This would equal half of the wait time window given to the riders.

Medical professionals should have more influence over the decision on approval of a rider using paratransit. As it stands, a medical professional is required to fill out a portion of the application for RTS Access however, this information is not widely considered during the application approval process. CDR recommends that if a rider is required to get their medical professional to fill out the application, the testimony of the medical professional should be more highly considered.

RTS must poll each person in their service for accurate data. This report indicates RTS Access had an On Time Performance (OTP) Rate of 93.5% and intends to increase it to an OTP Rate of 95%. These figures are questionable to an average rider of Paratransit Services because vehicles are at times outside the 20-minute window given to the passenger. The data delivered to generate the On Time Performance rates has been skewed by the very computer system that generates the information. It has been reported the GPS system used by the Busses computers indicates it is at a person’s driveway when in actuality they are at the corner of that street which is at least 3 driveways away. CDR recommends that when reporting on OTP, surveys are given to ALL riders who have taken the service in the last two years. This would show an accurate representation of true OTP and bring a better understanding of the people who decided to no longer take the service.

Riders should be alerted to the option of purchasing RTS passes online. RTS riders are not being told that they are able to purchase RTS passes online. This makes getting passes difficult because either they must purchase on the bus with exact cash or find a way to get one from the RTS main office. Furthermore, CDR recommends that riders have the opportunity to purchase an unlimited 30 day pass for RTS Access similar to the one that fixed route riders can purchase.

RTS cannot request riders to provide advance notice of bringing a service animal into an RTS Access vehicle. Per the Americans with Disabilities Act, riders are allowed to bring service animals any place that they are allowed to go. RTS cannot require riders to give advance notice of bringing their service animals on board.

RGRTA must make available accessible versions of all plan updates to fixed route and paratransit services. CDR recommends creating a fillable PDF for those using screen readers to gain the same information as those who do not. Graphs and images are not accessible to blind people so to create access, RGRTA must include image descriptions on ALL images.

###### Louis Kline

Louis Kline is an RTS Access customer who submitted a written letter during the public comment period. His comments are about Operational Policies & Procedures and No-Shows, Late Cancellations, and Suspensions.

Louis’s Written Comments

General Counsel

1372 East Main Street

Rochester, NY 14609

RE: Comments Regarding Paratransit Proposed Plan Update

Date: January 1, 2018

Dear Board of Commissioners:

My name is Louis Kline. I have been a customer/rider of RTS Access for approximately 13 years. After reviewing the paratransit plan update, I would like to submit the following comments regarding the proposed changes.

Regarding the No Show and Late Cancellation Policy outlined in Exhibit 5, I have some comments and concerns.

First, the 5% threshold seems to low and represents a threshold that will most likely penalize people who are not generally chronic misusers of ride scheduling. For example, if I were to ride 20 times in a month, and woke up sick one morning and cancelled my ride that would constitute a 5% late cancellation for that month. If it happens twice in a year, I would have a problem. Ten percent seems like a more reasonable figure, but in my opinion, 5% is excessively harsh.

Second, in this policy, as written, it affects people who ride only a few times disproportionately. For example, for someone who uses RTS Access 48 times a month, they could "no show" a couple times per month and still be okay. Over a six month period, missing at that frequency wouldn't constitute a suspension, but would actually be an increase in the number of no shows over what would be presently tolerated. On the other hand, someone who only travels a couple of times per week would hit the 5% threshold if they missed just one ride. This method of calculating excessive no shows and late cancellations seems to be deeply flawed for this reason. In theory, one could pad their rides with a bunch of extra rides, if they missed a ride to push the rate of no shows below the 5% threshold. It seems to me that this policy is a worse situation for everybody than the current policy.

Third, it seems like late cancellations and no shows are equated in this proposal, yet a no show is a much more serious matter than a late cancellation because it causes a driver to potentially drive what might be otherwise out of his or her way, and then the driver and passengers must sit for five minutes waiting for the rider to board the bus. In terms of the impact to overall service levels, this is a much more serious problem because it wastes everyone's time and it wastes money for excessive operational costs. While I concede that there is a cost to staffing drivers for expected rider scheduling, it is not as large a problem to the overall service as a no show. Both situations are undesirable, but probably should have different penalty structures.

Also, while not holding riders responsible for missed rides that were beyond their control seems like a concession, it is largely a subjective clause, for which the language is pretty vague, and which has the potential to be applied inconsistently.

Finally, while I am not advocating continuing the current policy, if it seems to RGRTA that it is not working, I do feel that the proposed policy needs further modification and should not be enacted as written. While I recognize the burden placed on RGRTA in the practical matters of scheduling an operating a paratransit service, I should like to point out that were I an average bus rider and I woke up ill in the morning, whether or not I could continue to ride a fixed route bus wouldn't even be a consideration, but because I have a disability, I must concern myself with it.

I urge you to consider the above mentioned concerns in addition to all written and oral public comments submitted by your ridership prior to the approval of the proposed plan. RTS Access is required to be a comparable transportation service for those who cannot utilize RTS fixed route service and some of the policies/procedures do not allow those with disabilities to have transportation access that is equal to fixed route and other transportation systems.

Thank you in advance for your consideration.

###### Rene Latorre

Rene Latorre is the Director of Advocacy and Consumer Affairs with The Association for the Blind and Visually Impaired and an RTS Access customer. Rene spoke at the Public Hearing on Nov. 28, 2017. Rene subsequently worked closely with RTS to provide guidance on developing accessible versions of the Plan for people who are blind or have low vision. She continues to assist RTS with improvements in this area. Rene also submitted written comments during the comment period through Contact Us (CRM). Her comments are about these topics: Service Area, Accessible Formats, Operational Policies & Procedures, Trip Subscriptions, No-Shows, Late Cancellations, and Suspensions, Request for Door-to-Door Service, Overall Communication, and System Redesign (Reimagine RTS).

Rene’s Verbal Comments from the Public Hearing Transcript

“Rene Latorre, Director of Advocacy and Consumer Affairs and I'm speaking on behalf of the Association for the Blind and Visually Impaired. Joe, Bill, and Megan, thank you very much for the opportunity to speak tonight.”

“I wanted to start out on a positive. I think since the last plan update wait times have definitely improved when you're waiting on the phone for customer service representatives.”

“On-time performance is better with the buses. That's improved. Professionalism of the customer service department is better.”

“However, I do want to go over a couple of concerns that we have. This proposed plan that was posted on the website, you go to that link and it's very inaccessible. It's a PDF file. So, in order to review the transportation plan, it was very difficult. I had to get that information from a person who e-mailed it to me and sent twenty-one separate documents. The informational meetings are not adequately providing information that our advisors need to hear. It was a very vague and brief overview. I don't mean to be critical, but if you look at the transportation plan, it is very lengthy and it goes into a lot of detail that is not drawn out in these informational meetings. So I do invite people to please read your transportation plan before we print a final comment. I couldn't agree more that it should be extended, because it was inaccessible. Communication is a difficulty with RGRTA, especially for us folks who are blind and visually impaired or anyone who needs an alternate format.”

“That information is not readily provided. So people who are being suspended or being threatened of losing anything, they get a print letter in the mail. A lot of folks live independently and don't have someone to read information to them. That is a problem. Consistent information, policies that are consistent across the board. They seem to change all the time depending on who you're talking to.”

“Subscription rides are a problem. According to the transportation plan, it looks like there are very, very restrictive new policies being implemented that you can't cancel up to under five percent. If you have a one-way subscription that means you can only miss one time per month. I think most people would be hard pressed to say, especially those of us who work, that you are never sick, never vacation, you don't have a sick child you need to go home to, you never leave early, only one time a month. That would be difficult for most people. Also, you should be eligible to be on the subscription six months of no cancellations for any reason, even advanced, even excused. That's unreasonable. I would ask and urge that the Board of Commissioners reconsider that and edit that in their transportation plan. Same thing with cancellations. It's too restrictive on what you can cancel. An advanced cancelation – I understand no-shows, we want to crack down on those, yes -- but the advanced cancellation with plenty of time, that needs to be a little bit more lenient and get rid of those restrictions. Door to door, we just ask that people have door to door across the board. If that is what they need, some of us folks need it, they don't have to ask for it every single time. Thank you for listening.”

Rene’s Written Comments

To Whom It May Concern:

On behalf of the Association for the Blind and Visually Impaired- Goodwill and the hundreds of people we serve every year, I would like to submit the following comments regarding the Paratransit Proposed Plan updates:

Subscription rides - the proposed criteria to obtain and maintain a subscription are unreasonable and virtually unobtainable. While putting efforts in place to reduce or eliminate no-shows is understandable, these unduly strict policies regarding cancellations of any kind punishes those riders who do provide advance cancellations. It is unrealistic to expect riders to cancel or change rides less than 5 percent of total rides. This does not allow for illness, vacation, sick children, etc. We urge you to reconsider this policy and to increase the percentage of allowable advanced cancellations to at least 10–15 percent of total rides. In addition, the criteria to even make the waitlist to get a subscription is even more unreasonable. I challenge anyone in the general population to see if they can go six months straight without one sick day, vacation day, working late, or leaving early.

No-Show and Cancellations - The comments above regarding unduly strict cancellation policy is applied to this area as well. To expect a rider to never change or cancel a ride to reflect no more than five percent of all total rides is not readily achievable. Again attempting to have policies that reduce or eliminate no-shows is understandable, however, advanced cancellations need to be considered. Riders have the expectation that if they cancel two hours prior to their scheduled ride, they will not be penalized in any way for it.

This policy needs to be communicated consistently across all RTS Access staff and Customer Service representatives. The policy should also apply to all riders whether they have subscriptions or not. Presently subscription riders seem to be under a different expectation that riders are not aware of. Your own VP communicated false information regarding cancellation policies for subscription riders at the informational meeting stating that subscription riders are allowed to cancel rides if it is two hours prior to their scheduled ride. This is just not true and Customer Service representatives have been telling riders that they cannot cancel more than 10 percent of total rides even with advanced cancellations.

Enhanced Service - although many riders prefer the term enhanced service for door-to-door, calling it reasonable modification or accommodation it’s acceptable if the service remains the same. We are recommending however that some clarifications be put in place surrounding the service. Many riders are not aware that they have to request this service every time a ride is scheduled. It is recommended that the Enhanced service question be added to the list of questions that a Customer Service representative asks every Rider each time a ride is scheduled. This would help remind the Rider that this service needs to be requested every time as well as eliminate confusion on whether they have put the door-to-door service request in place.

Service area - although there are no proposed changes to the RTS Access service area, it needs to be stated that there is still a very significant underserved population of those who desperately need transportation. There are many areas such as Chili, Henrietta, certain areas of Greece, Hilton/Hamlin, Webster, etc. that once had service but no longer due to RTS fixed route eliminations.

As the Reimagine Project survey focuses on the needs of its customers, it needs to be noted that the needs of the RTS Access riders are not being considered in the same way. We all know that whenever there is a change to RTS fixed route, it will automatically create changes to the service area of RTS Access. For this reason, we are asking that the input of RTS Access riders also be considered with the same weight of RTS Access fixed route riders. To date, the interactive Reimagine survey is so incredibly inaccessible, that there is no possible way for a blind or visually impaired individual to complete the survey independently. We have many blind and/or visually impaired individuals who do rely on RTS fixed route buses for their primary source of transportation. These individuals have equally important input when considering changes to fixed route service.

Thank you for your consideration.

###### Chris Louden

Chris Louden is an RTS Access customer who submitted written comments during the comment period through Contact Us (CRM). Chris’s comments are about Trip Subscriptions and No-Shows, Late Cancellations, and Suspensions.

Chris’s Written Comments

EXHIBIT 3: and EXHIBIT 5: for the Paratransit Plan Update

I'm concerned regarding the cancellation policy you are putting into place for the 2018 year. I use the RTS Access service to get to and from work safely. I have medical appointments, or I want to take some time off work during the month. With this new plan you are putting into place I can only miss a day (2 rides!) in a calendar month before I get put on notice! I read EXHIBIT 5 Section 2.0 stating about the 5% cancellation policy. Can I cancel early to avoid the penalty? (Example 24 hours to 7 days in advance?) If I'm not going to use the service, I like to give plenty of notice. This frees up my slot for someone else who needs the service. Can you lower the cancellation time for; (Getting sick, rush to hospital, need to see the doctor, or you realize you don't need the ride anymore) I like the subscription service and want to keep on using it. I look forward to your feedback.

###### Paula Mathews

Paula Mathews is an RTS fixed route customer who spoke at the Public Hearing on Nov. 28, 2017. Her comments are about these topics: Service Area, Response Time (Trip Reservations), Capacity, Accessible Formats, No-Shows, Late Cancellations, and Suspensions, Eligibility, Fares, and Overall Communication.

Paula’s Verbal Comments from the Public Hearing Transcript

“Okay. I currently do not use - the current administration. But I spent four hours reading this document today, plus the links don't work on the document, because you people - cyber security website. So I'm going to ask that this deadline for December 5th be extended another week to get those links fixed so that I can go back and look at them. Also, the links to - the remote links to the exhibits, trying to read the document and check out the exhibits on the computer is next to impossible. I have a problem with the wait time for having to wait an hour to be picked up. If you're in a doctor's appointment and you're done in fifteen minutes, you have to wait forty-five minutes to be picked up. And then this pickup driver thing where the driver only has to wait five minutes. If you schedule an appointment for a pickup for 9:30, you should be out there between 9:20 and 9:40. And if the driver comes at 9:20 and you're not out there he gets to leave at 9:25, but your pickup time is supposed to be 9:30. That's not even comparable to RTS. You only have to be out to your bus stop five minutes before the bus usually comes. And you have the WMB for that. So I have an issue with that. I have a real issue with the fare structure. Most of us are on a fixed incomes and this is double the RTS fare. So I kind of would like that to be looked at. This document says it's supposed to be comparable to the fixed route, the regular RTS. So that is an issue that I've always had. Sorry. I'm going really, really fast.”

“Let's see. On your application, I skimmed through it really quick. It doesn't say what exactly you need to be eligible to apply. So why am I going to apply if I'm not eligible? There is a spot for about the bus stop, but it doesn't say the problems that there are with the bus stop, like: Some don't have concrete pads; some are in the grass. I don't like to get on and off in the grass because I could slip and fall. You need to define your definition of milder weather. I couldn't find the public comment from the other two sessions online anywhere for me to look at. I had a problem with being comparable to the RTS route to not travel to the location. I couldn't quite understand that. Like, if you wanted to go to the JCP to a play, the bus does go to the Jewish Home, it does come by the JCP, but does it not do that with Access? I really would have had to - there's really a whole list of stuff. Oh, the suspension thing, it doesn't say anywhere in it about it being used per calendar year, but when I looked at the example, it had like one month and then you did find two months and then you get a second warning the third month later. So that needs clarification.”

###### Mrs. Louise Morales

Mrs. Louise Morales is an RTS Access customer who spoke at the Public Hearing on Nov. 28, 2017. Her comments are about the Handbook for Riders and Operational Policies & Procedures topics.

Louise’s Verbal Comments from the Public Hearing Transcript

“Thank you. I would like to have a set of rules and regulations on what you can do and what you can't do and what is expected. On the bus and also on the Access bus some places that I cannot -- the bus will not take me and I have to depend on the Access. Some places it's like a short distance and I get on the bus and I'm asked all different kinds of questions and it's like: Well, this is not the policy and that's not the policy. Then they will call someone to the bus and say: This is not permitted. One incident that I had is my great-granddaughter sometimes stays to help me out, but she's not old enough or she can't help you. But I've got carpal tunnel, my legs give out. I need help carrying groceries and stuff out of my car and putting them in and I can't afford an aide off the line. Sometimes the insurance might cover before "X" amount of time. Sometimes it won't cover it at all. So I need to know what my rights are on both the bus and the Access and more, you know, respect given when you get on the bus. And if you don't -- like, I don't have -- what are the beepers that you drive along in the grocery store? And I'm trying to get on and I'm more stable with my shopping cart. And I get so many different complaints, you know. And it's like: You can't take up this amount of seat and you can't take up that amount of seat or you have got to put your cart up, but if you can't reach to put it up there and you're out and it's going to cost you for the whole day. So you got everything in the same neighborhood and you medically sick. So I need to have this be shown. I need to know my rules and regulations. Thank you.”

###### Lawrence Nichols

Lawrence Nichols is an RTS Access customer who submitted a written letter within the comment period. His comments are about the following topics: Service Area, Response Time (Trip Reservations), Accessible Formats, Trip Subscriptions, and No-Shows, Late Cancellations, and Suspensions.

Lawrence’s Written Comments

Nov. 22, 2017

Re: RTS ACCESS Public Hearing

1325 Main St.

Rochester, NY 14625

Due to mobility limitations and personal scheduling I was not able to attend the sessions on 11-9 and 11-16. Some comments:

-the rationale regarding the limitations of service area for Access to only the areas of RTS service is unclear and needs to be expanded

-the ‘subscription’ ride element is advantageous but also complicated and should be simplified

-the ‘penalty’ for making last minute changes is understandable but when the changes are made by a medical/Professional Provider or personal life events (funerals, hospitalizations – situations out of our control – customers should not be penalized

-Customers should not be penalized or inconvenienced when errors are made by Schedulers &/or Drivers

-the entire ACCESS program should be accessible on Personal Computer as an option – including cancelation notifications; Personal Computers and smart phones (with internet accessibility) are widely available

Acknowledgment is made of the monumental task performed by the Schedulers however there are multiple cases of wastage of resources (empty buses passing each other, Customer living in the same or nearby location traveling at the same (or similar) time

###### Adam Pehur

Adam Pehur is a Certified Orientation and Mobility Specialist with The Association for the Blind and Visually Impaired. He submitted written comments during the comment period through Contact Us (CRM). His comments are about the Trip Subscriptions and Request for Door-to-Door Service topics.

Adam’s Written Comments

RTS Access

I would like to add suggestions regarding the Paratransit Plan Update. I do not agree with eligibility requirements for anyone trying to receive subscription. For someone to not be able to cancel, with proper requirements for six months is too long. Someone might get sick, have a child be sick, or an emergency where they need to cancel their ride. Another proposal that I don't agree on is the 5% threshold you are requiring for subscription riders. I understand you can't have riders cancel their subscription rides all the time, but 5% is just not obtainable by most people. I did not see anything in the plan about what people would have to do if they took a vacation. Also, I didn't read what a subscription rider would do with a holiday their work sponsors and not RTS. The 5% threshold also doesn't give much leeway if the rider is sick, their kids, or family members they care for are sick. I believe the threshold needs to be increased. My last idea is for permanent door to door service.

###### Ellyn Prietz

Ellyn Prietz is an RTS Access customer who spoke at the Public Hearing on Nov. 28, 2017. Her comments are about the Handbook for Riders, Overall Communication, and the Budget.

Ellyn’s Verbal Comments from the Public Hearing Transcript

“I would like to see some better communications from RTS Access to the people. I've been riding for many years and I haven't really understood all of the rules and regulations. I would just like to see that better communicated.”

“Also, you said that there was an eleven percent increase in ridership. However, it was stated that your budget has not been increased in nine years. What is being done or what can we do to speak to whomever to get that budget increased, perhaps to provide better service?”

###### Teresa Rand

Teresa Rand is an RTS Access customer who spoke at the Public Hearing on Nov. 28, 2017. She also submitted written comments during the comment period through Contact Us (CRM). Her comments are about these topics: Response Time (Trip Reservations), Capacity, Operational Policies & Procedures, Service Animals, Trip Subscriptions, Request for Door-to-Door Service, and Trip Subscriptions.

Teresa’s Verbal Comments from the Public Hearing Transcript

“Okay. My concerns are the buses have been coming too early; and sometimes they say they're going to leave before they're even supposed to get there. Then they say they want to go. They should park somewhere. Some of them do. And then the other concern I have is sometimes the dogs are out in the middle of the aisle. This happen on RTS too. And those are the comments I came up with from where I am. I guess I'm done.”

Teresa’s Written Comments

RTS Access Proposed Plan Updates

Hello, I read the proposed plan and would like to make a couple comments regarding subscription service. It is unreasonable to require no changes in travel history for a 6 month period in order to be eligible for subscription. Everyone within a 6 month period could have the following disrupt their daily routine- day off/vacation, doctor’s appointment, illness or sick child/parent. For this reason it is unreasonable to only allow 5% cancellation, as that is only 2 rides per month for a person working 5 days a week. There is no mention of a vacation exemption such as if a person takes a week off work for vacation. I suggest allowing a person to be enrolled in 'enhanced curb to curb service' so it doesn't get missed as I've had people request it and not receive it. Operators do not prompt a person for this information which also increases the likelihood of misunderstandings. Thank you.

###### Joseph Santacesaria

Joseph Santacesaria was the President of the People’s Empowerment Network as well as an RTS Access customer. We are saddened to report that Joseph passed away on February 09, 2018. Joseph spoke at the Public Hearing on Nov. 28, 2017. He also submitted a written letter at the Public Hearing. His personal attendant read as much of Joseph’s letter as she could during the allotted three-minute speaking period at the hearing. His comments are about these topics: Service Area, Response Time (Trip Reservations), Capacity, and System Redesign (Reimagine RTS).

Joseph’s Verbal Comments from the Public Hearing Transcript

“My name is Joseph Santacesaria. I'm a self-advocate. In the interest of saving time, so as many people as possible can speak, I elect my attendant to read my written testimony for me. Thank you.”

Joseph’s Written Comments

Reimagining RTS

Tuesday, Nov. 28, 2017

Thank you for the opportunity to speak today. I have mobility challenges and for me to live independently in our community, I need to have consistent access to quality, reliable, responsive customer-centered transportation. This access to quality transportation services is critical for me to continue to be engaged with family, friends, and actively engaged, connected, and involved in community.

I am President of People's Empowerment Network, and a member of Friends Helping and Supporting Friends, and have been working in the community as a public speaker and job trainer for Lifetime Assistance since 2012.

I have been using para-transit services from RTS for almost 30 years. I am a life-long resident of Rochester, and my family continues to live in this area. My immediate family —two brothers and a sister all continue to live in the greater Rochester area, and none are more than 1/2 hour from me. My sister and brother in law are only 9 minutes away. However, all of them are currently outside of the service area covered by RTS. When my family wants to get together, we are currently forced to go to a restaurant.

I have read the Reimagine RTS draft plan - If RTS expands the service area as proposed, I would be able to visit my family in their homes. This one change would make a positive impact on many people who rely on paratransit. I am very pleased and supportive of creating a wider service area.

I also advocate for myself and for many others for RTS to extend the current hours to schedule until at least 8 pm. The results would be more paratransit buses on the road, and would provide riders with more flexibility. The current three days in advance requirement for scheduling has not been problem for me, but it may be for many others. I support all options that would improve flexibility in scheduling. Increasing scheduling options should be a goal and would increase use and improve the lives of many with disabilities. Riders with disabilities should be viewed as an important consumer group where services should be strengthened and expanded to meet their needs - this should be a continuous process that is reviewed on a regular basis.

If there are more buses, the wait time would be reduced. I have had to wait one to two hours to be picked up, and if the meeting has ended, and I am forced to wait outside, the wait can negatively impact my health. If these concerns can be reduced, I can be more comfortable making plans to go to meetings and events. If RTS has more buses on the road, I would not have to wait if I do now and could be assured that pick up would be timely. After 6 pm, there are currently only 2 or 3 buses available. If there were consistently 4-6 buses, passengers would not wait so long, and passengers would be more comfortable in making plans in the evenings.

As we reimagine RTS, we need to have a vision where we ca make our public transit programs more inclusive where people with and without disabilities can ride together. Where paratransit services are more affordable and there are more options available for people with and without disabilities to access safe, affordable, and readily available transportation. Currently more than 20% of Americans have a disability. With our aging population, these numbers will continue to increase. Transportation impacts every aspect of a person's life — employment, recreation, access to health care, education, family — I can't go anywhere without RTS giving me transportation. Please work with members of the disability community to design a system that is accessible, flexible, and available for all people in our region where transportation is no longer a barrier but an opportunity for people with disabilities to enjoy all that our community has to offer.

Thank you for considering my ideas and recommendations.

###### Justin Young

Justin Young is a Pooled Trust Advocate with the Center for Disability Rights as well as an RTS Access customer. He assisted RTS with the development of accessible formats for the Paratransit Plan. His written input occurred during the comment period and has been included as public participation. His comments are about Accessible Formats.

Justin’s Written Comments

Hope this message finds you well! We want to thank you for willing to work with our organization in terms of accessibility. In terms of getting information out to individuals specifically blind individuals, I would highly recommend RTS Access looking at the applications that come in and create a database of who has selected to receive the documentation in alternative formats. For example on the application in the past, there were selections for Braille, Large Print, Audio CD or even Word documents on a CD Rom works or electronic via email. It has been my experience that in the past RTS Access does not use that data to their advantage. Meaning by this for example for the last 12.5 years I’ve been a rider every time I recertify I say to receive documentation as a preferred option in electronic via email, provide my email and still get documentation in standard print in the mail. That is my first observation of how RTS Access could do a better job of reaching its membership of riders.

In terms of screen reading software, PDF documents as a general rule are tricky because they can be generated in 2 different ways. The first is if you use a scanner to scan a document and then have it create a PDF document from it. This technique will not work for Screen Reading software or as it is often also known as “Text to Speech” software because it will view it as an image instead of a document with text. The second method is to take a document that was generated in word and convert it to a PDF. This is what was originally done from what I can tell with the Paratransit Plan. The problem with the Plan is the Exhibits that were images with very poor image descriptions. This is why the Blind community was unable to view the full report in its original format. For low vision individuals, word documents of the plan should be defaulted at 18-point font and bolded would be suggested as well.

If you want to break up the plan more, you could divide it by section and create a link that navigates directly to that section of the document. I’m not certain of how to do this effectively in word, but I know it can be done in PDF documents. You could have a dedicated section on the website of myrts.com/access dedicated to plan updates and on that site have downloadable documents with the plan sections. This could be done by having like a compressed word document file.

If individuals are unable to use a computer the alternative formats of Braille, or Large print could be sent to them via mail. These are just a few suggestions I could think of off the top of my head. You could also reach out to the National Federation of the Blind of Rochester, NY whose phone number is 585-851-8632. Hope this helps and if you have further questions, please contact us at the Center for Disability Rights or the NFB of Rochester chapter who both want to ensure accessibility is available for everyone!

End of Report on Public Comments (2017-18) in Exhibit 13.

Transcript of the Public Hearing for Proposed Paratransit Plan Updates, November 28, 2017

ROCHESTER-GENESEE REGIONAL TRANSPORTATION AUTHORITY

PUBLIC HEARING

NOVEMBER 28, 2017

Proposed Paratransit Plan Updates

A Public Hearing held at the RTS Administrative Building, Board Room, 1372 East Main Street, Rochester, New York 14609, on the 28th day of November, 2017, commencing at 5:06 p.m.

PRESENTERS

BILL CARPENTER, Chief Operating Officer for RGRTA

MEGAN MORSCH, Vice-President of Marketing and Customer Service

JOE JABLONSKI, Vice-President of Operational Initiatives

REPORTED BY:

BRENDA CURNOW, Court Reporter

PUBLIC HEARING - RGRTA

(The Public Hearing commenced at 5:06 p.m.)

PRESENTER BILL CARPENTER

Thank you all so much for coming. I'm Bill Carpenter, the Chief Executive Officer for Regional Transit Service and RTS Access. Thank you for being here.

We held two information sessions leading up to today to introduce you to the proposed changes to the Paratransit Plan. We get a lot of feedback and questions about our Paratransit Service from customers and other individuals in the community. The same was true during the information sessions. Thank you. And I heard from some folks if there were still things overall about RTS Access that aren't clear and I'll be working with my staff after this session: How do we communicate more what's included in the plan -- and we'll have more information about that after tonight; but, for tonight, when we're considering changes to our service or proposing updates to the plan, we do our best to listen to you and balance your needs with the regulations, requirements and restrictions set forth in the Federal Transportation Administration Guidelines. We've long been a leader when it comes to providing services above and beyond what the Americans With Disabilities Act requires. The ADA requires that the Paratransit Service is three-quarters of a mile either side and beyond the RTS fixed route service area. We exceed the requirements by providing service for an additional 1.5 miles beyond the initial three-quarters of a mile.

Today's presentation session will focus on the changes and improvements we propose in the Paratransit Plan. The agenda is as follows:

Megan Morsch, our Vice-President of Marketing and Customer Service, will explain the procedure we'll follow during the Hearing; Joe Jablonski, our Vice-President of Operational Initiatives, will go through the proposed changes; we'll have a public comment period for all registered speakers; following the comment period Megan will explain what happens next; then we'll end the Hearing.

Your comments here today will inform the final outcome of the Paratransit Plan. Again, thank you for being here and I officially call this Public Hearing to order. Megan.

PRESENTER MEGAN MORSCH

Thank you, Bill. I am here to share with you the format of today's Public Hearing. Now, everyone who wants to speak has registered. We will then proceed with the presentation. After the presentation I will call each person to speak in the order that they registered and provide them the microphone. Each person will be given a maximum of three minutes to comment.

During the Public Hearing all comments and questions will not be responded to at this time, but will be responded to you in writing by the end of December. The responses will be posted on the RTS website at myRTS.com, mailed to all of you who have provided a mailing address and also e-mailed to those who provided an e-mail address.

We have a transcriptionist here this evening. All of your comments will be recorded and shared with the RGRTA Board for review. If you did not register to speak, you still have an opportunity to submit your comments online at myRTS.com/Contact-Us or you may mail your comments to General Counsel at 1372 East Main Street, Rochester, NY 14609. Further comments are due no later than Tuesday, December 5, 2017 at 5:00 p.m. EST. There are handouts in the back of the room with specific details of how you can submit your comments after this meeting.

So, at this point, I would like to introduce Joe Jablonski, the Vice-President at RTS Access, who will give the presentation about the changes.

PRESENTER JOE JABLONSKI

Thank you, Megan.

Good evening. So what is the Paratransit Plan? The Paratransit Plan is a document that puts on paper and clarifies what the formal operational procedures are for RTS Access. It ensures that the level of Paratransit Service provided by RTS is comparable to fixed route service; and, by comparable, I mean to say that it meets the service criteria set forth in the law in terms of service area, response time, fares, hours and days of service, no restrictions on trip purpose, no capacity restraints and a process for eligibility.

In 1991, the Secretary of Transportation made it a requirement to have a Paratransit Plan. By 1997 all fixed-route providers had to comply by preparing a plan and submitting it to the FTA, the Federal Transit Administration.

RTS updates the plan every few years to ensure customers and employees have the most accurate information possible. It is required to update when we are told to do so by the FTA. We self-identify and report on noncompliance and we introduce new fixed-route service. The update is recommended to ensure compliance with the law and to improve procedures and processes and to incorporate community feedback as a part of the formal policy. We have an opportunity for clarity, continuity, compliance and communication. And the fact that Paratransit ridership has increased, it is time for an update. The ridership is up this year almost a little over eleven percent; over the last three or four years, anywhere from three to four percent.

The proposed changes for review identifies the basic operating mode. We are curb-to-curb. We eliminate the enhanced service term and request for assistance beyond the curb, door-to-door, is covered under reasonable modification. If an RTS fixed-route service change affects the service area for RTS Access, affected customers will receive written notice with time to make alternate arrangements, not to thirty-days before the event and ninety days after that effective date of the event - - of the change.

Increased opportunities to enroll in subscripted trips. So we're changing it from customers will have two weekly repeat trips and qualify down from three. And there are written materials describing the qualifications,

allowances, restrictions and expectations regarding subscriptions.

No-show policy has been simplified and should be easier to understand. Used as an FTA calculation method, materials use simpler language and there clear examples. Separate suspensions based on no-shows -- excuse me -- it separates suspensions based on no-shows from suspensions based on prohibited behavior. Again, in the plan, there are nineteen different, possibly more, but we summarized it with nineteen different points of prohibited behavior.

Pickup period for return trips and no strand policy. So we established a concept of a final pickup period, no return trips after the final pickup period, explained the concepts of round trips, return trips and same-day service and explained circumstances for when RTS Access will provide return trips so customers are not stranded.

There is an easier application process for Paratransit eligibility. This might be easier to use, understand it and there is a checklist to make sure that all the documents you need are there; fewer pages; questions presented in a multiple-choice format; and medical certification takes the center stage in our application.

In the plan we also highlight timely service as a measure of customer satisfaction. We increased our on-time performance goal from 93 1/2 to 95 percent. And OTP procedures, On-Time Performance procedures, are included to show the level of importance.

There are other relevant topics of note: Reasonable modification, service comments and points on service animals and how to file a complaint, as well as a customer -- if you enjoy the service. So we have our public comment period.

PRESENTER MEGAN MORSCH

Thank you, Joe.

We are going to go to our comment period. I'm going to be calling the people that have registered here in order and I ask that you stay in your seats. I have a stopwatch here. So each person will have three minutes and we are not going to respond to anything. Any answers will be written down and sent to you afterwards.

All right. The first one on the list is Scott Davis.

AUDIENCE MEMBER SCOTT DAVIS

First of all, good afternoon or good evening everybody. Hope all is well.

Now, I am a Lift Line user, but I'm also an RTS user as well. I use RTS because I'm a deacon at the Lutheran church, a lay deacon. And, you know, changing the routes would probably make it very hard with Lift Line and very hard to, you know, get rides essentially home from work or to work. It would, you know, make it hard to meet with going out to hockey games, church, those type of things. So we need to keep the stuff the same or the way we have it because it's going to impact, you know, our freedom. So we need to keep it totally the same. We also need -- but we need RTS service. I understand that. It was bought out by RTS and I suggested millions of times that they go to Finger Lakes Racetracks, which is just no more than five minutes away from Eastview Mall. So if they go to Eastview, they should just go down Route 96 another five minutes to Finger Lakes Racetrack. You know what I mean? Because I do go to Finger Lakes once or twice a year and I am somewhat successful. That's why I'm thinking that you need to keep it the way it is.

PRESENTER MEGAN MORSCH

Thank you, Scott. The next person on the list is Joseph.

AUDIENCE MEMBER JOSEPH SANTACESNIA

My name is Joseph Santacesnia. I'm a self-advocate. In the interest of saving time, so as many people as possible can speak, I elect Mae Tendant (phonetic) to read my written testimony for me. Thank you.

AUDIENCE MEMBER MAE TENDANT

Thank you for the opportunity to speak today. I have mobility challenges and for me to live independently in our community I need to have consistent access to quality, reliable, responsive customer-centered transportation. This access to quality transportation services is critical for me to continue to be in engaged in family, friend and actively engaged, connected and involved in my community. I am president of People's Empowerment Network and I am a member of Friends Helping and Supporting Friends and have been working in the community as a public speaker and job trainer for Lifetime Assistance since 2012. I've been using Paratransit Services from RTS for almost thirty years. I'm a life-long residence of Rochester and my family continues to live in this area. My immediate family, two brothers and a sister, all continue to live in the Greater Rochester Area and none are more than a half mile from me. My sister and brother-in-laws are only nine minutes away. However, all of them are currently outside of the service area covered by RTS. When my family wants to get together we are currently forced to go to a restaurant. I have read the Reimagine RTS Draft Plan. If RTS expands the service area as proposed, I will be able to visit my family in their homes. This one change will make a positive impact on many people who rely on Paratransit. I'm very pleased and supportive of creating a wider service area. I also advocate for myself and for many others for RTS extending the current hours to schedule until at least 8:00 p.m. The result would be more Paratransit buses on the road and would provide riders with more flexibility.

The current three days in advance required for scheduling has not been a problem for me, but it may be for many others. I support all options that would improve flexibility in scheduling.

Increasing scheduling options should be a goal and would increase use and improve the lives of many with disabilities. Riders with disabilities should be viewed as an important consumer group where services should be strengthened and expanded to meet their needs. This should be a continuous process that is reviewed on a regular basis.

If there are more buses, the wait time would be reduced. I have had to wait one to two hours to be picked up; and, if the meeting has ended, I'm forced to wait outside. The wait can negatively impact my health. If these concerns could be reduced, I could be more comfortable making plans to go to meetings and events. If RTS has more buses on the road, I would not have to wait as I do now and could be assured a pickup would be timely. After 6:00 p.m. there are currently only two or three buses available. If there were consistently four to six buses, passengers would not wait as long and passengers would be more comfortable in making plans in the evening.

PRESENTER MEGAN MORSCH

Teresa? You can sit right there.

AUDIENCE MEMBER TERESA RAND

Okay. My concerns are the buses have been coming too early; and sometimes they say they're going to leave before they're even supposed to get there. Then they say they want to go. They should park somewhere. Some of them do. And then the other concern I have is sometimes the dogs are out in the middle of the aisle. This happen on RTS too. And those are the comments I came up with from where I am. I guess I'm done.

PRESENTER MEGAN MORSCH

Thank you. Ellyn? All the way in the back.

AUDIENCE MEMBER ELLYN PRIETZ

I would like to see some better communications from RTS Access to the people. I've been riding for many years and I haven't really understood all of the rules and regulations. I would just like to see that better communicated.

Also, you said that there was an eleven percent increase in ridership. However, it was stated that your budget has not been increased in nine years. What is being done or what can we do to speak to whomever to get that budget increased, perhaps to provide better service?

PRESENTER MEGAN MORSCH

Thank you. Next on the list is Ericka Jones.

AUDIENCE MEMBER ERICKA JONES

I'm speaking on behalf of not only myself, but also the Center For Disability Rights. We just had a few thoughts.

First of all, there should be longer service and less time waiting for a ride. So, for instance, if someone wants to go to the store they should have the freedom to do that. That might take less than thirty minutes and then we're told we have to wait an hour for a ride to come get us, at the very minimum. That means another thirty minutes of waiting in a possibly unsafe area. So that is a concern of ours.

Also, we would like to see the hours of operation for the scheduling office to increase just slightly for those of us that work nine to five. If the office closes right at five o'clock that kind of puts us in a situation where we're expected then to wait for a ride. If something happens, we have no one to call after five o'clock.

And then we would like to see the rights and responsibilities of the riders available to all passengers. We've noticed that a lot of communication is paper and that is not accessible to everyone. And so we would like to see alternative formats, like, large print Braille or audio CD, electronic format, different ways of communicating with your riders. That also goes for disseminating information for the appeals process or service suspensions or no-shows. If you're sending that information in the mail and the person can't read or is unable to read a paper format, they're not getting the information, they're not knowing why they are being suspended.

Also, we were curious as to what will happen if the fault is on the driver as far suspensions go. It could be that someone is suspended for weeks that it wasn't their fault. How the appeal process is going to go for them and how do they get that info?

Also, medical professionals, if it's required in the application to have them fill out a portion of it, their opinion should weigh much larger than what it does, because they have to form relationships with your doctors. So they have to know you pretty well.

PRESENTER MEGAN MORSCH

Okay. Thank you. Heather Bird.

AUDIENCE MEMBER HEATHER BIRD

My name is Heather Bird and I'm the President of the National Federation of the Blind of Rochester. And I actually haven't seen this plan. I'm not sure why. I'm not sure where it was posted, but that's neither here nor there.

Once the plan is implemented it needs to be available in an accessible website on RGRTA website somewhere. So one thing I want to address is that policies are not clear and they're not applied across the board. For instance, I have two children. I ride with them a lot of the time. I have never had a hassle. I have another friend who also rides with two children. She has been told she can only bring one child. That actually borders on eugenics. They cannot make a policy that someone's biological or legal children cannot accompany them. It needs to be included. I understand you can't bring a bajillion friends with you and have a bunch of guests, but if legally the children are your responsibility, as a parent -- they don't restrict, you know, a mom who gets on the RTS city bus with five children. That is her business. I have never had a hassle myself, but I have friends who have been told: We have to send another bus, because we can't have two guide dogs on the same bus. There's not room, but the bus only have two other people.

I want to speak about rights and responsibilities. It is the responsibility of the service dog handler to control it. If you're having issues with dogs jumping on people or hanging out in the aisle, you cannot penalize the rest of us with well-behaved dogs by putting restriction on how many dogs can be on the bus. You should take the individuals who are not controlling their dogs and suspend them or restrict their dogs from riding. You absolutely legally can if the dogs are not being controlled properly. I have been to three different guide dog schools and I've had dogs since I was sixteen. We are taught how to transport these dogs. In theory, you can have an entire bus that holds, what, fourteen people, maybe; and, every seat could have two guide dog users with the dog sitting between their feet with no problem at all. If that's not happening, hold the individual riders accountable and don't hassle the rest of us.

An example, I know there's a customer that is being transported to Eastview Mall when other people aren't. I'm sorry. That's not acceptable, because they don't get service or we do along with them. Every person has to be given the same policies. There was something like that. I don't remember the specifics.

So what we're basically asking is for a copy of the plan, but also there needs to be a rider handbook, even if it's long. That's our responsibility to read it. We want a long handbook with all the nitty-gritty, including service dog policies and that children can be transported, all these little things. And we want it in an accessible format to new and existing customers.

PRESENTER MEGAN MORSCH

Bernice Bird.

AUDIENCE MEMBER BERNICE BIRD

I have several points I want to continue on with what Heather was saying. We have -- and I am the chair of the advocacy committee. We've been trying for at least six months to get a copy of the rider's responsibilities and rights. We were told they would come out in September. It has not come out. We have not received anything. The reason we need this is because when we encounter schedulers and drivers who don't know the law and it seems, on the surface, like, they're making a policy on the spur of the moment. We have nowhere to look back and say: Oh, yeah. That's on Page 10. And it says this, but that doesn't seem like you're interpreting it correctly. There should be a way someone can go to for that interpretation.

The other thing is that I was riding -- I was the one, and my friend, who encountered the driver who said: Oh, you can't have two dogs on the bus. You should have told them. They would have – I would have to call for a backup if we had a wheelchair. And that's a lot of garbage. We rode numerous times together and I've been to other meetings where there's been eight/ten dogs on the bus and there's no problem at all. So my point is that everyone from top to bottom needs to be educated about what the law is.

The last point is, it is illegal to ask someone beforehand if they are traveling with a dog. And we would be glad to send you the law and point it out. We've had people in our group that have been told: You can't take that ride, because there's already a dog on that bus. You have to reschedule. That's just so crazy. And I think they may have changed the policy, but when the cars first came, we were told people with dogs couldn't ride in a car. Although I rode in a car one day and the driver insisted on dropping me off before they got another passenger, because even though my dog was on the floor, not even with his head on the hump. He was directly in front of me minding his own business being quiet and well behaved. We need to do something to fix this so we aren't -- we do not be hassled about this.

The very last thing is, the driver that I encountered about the dog, she seemed to want to threaten me and say: You know, you're being recorded. I said: Wonderful, because I know I'm right and you're wrong. So I really do hope that someone at Lift Line saw that conversation and listened to it, because I did not appreciate being hassled because I have a dog and there's another dog on the bus. I want policies to be implemented across the line and not have one particular scheduler or driver give me some harebrained policy that no one's ever heard of before.

PRESENTER MEGAN MORSCH

The next on the list is Paula Mathews.

AUDIENCE MEMBER PAULA MATHEWS

I currently do not use -- the current administration. But I spent four hours reading this document today, plus the links don't work on the document, because you people -- cyber security website. So I'm going to ask that this deadline for December 5th be extended another week to get those links fixed so that I can go back and look at them. Also, the links to -- the remote links to the exhibits, trying to read the document and check out the exhibits on the computer is next to impossible. I have a problem with the wait time for having to wait an hour to be picked up. If you're in a doctor's appointment and you're done in fifteen minutes, you have to wait forty-five minutes to be picked up. And then this pickup driver thing where the driver only has to wait five minutes. If you schedule an appointment for a pickup for 9:30, you should be out there between 9:20 and 9:40. And if the driver comes at 9:20 and you're not out there he gets to leave at 9:25, but your pickup time is supposed to be 9:30. That's not even comparable to RTS. You only have to be out to your bus stop five minutes before the bus usually comes. And you have the WMB for that. So I have an issue with that. I have a real issue with the fare structure. Most of us are on a fixed incomes and this is double the RTS fare. So I kind of would like that to be looked at. This document says it's supposed to be comparable to the fixed route, the regular RTS. So that is an issue that I've always had. Sorry. I'm going really, really fast.

Let's see. On your application, I skimmed through it really quick. It doesn't say what exactly you need to be eligible to apply. So why am I going to apply if I'm not eligible? There is a spot for about the bus stop, but it doesn't say the problems that there are with the bus stop, like: Some don't have concrete pads; some are in the grass. I don't like to get on and off in the grass because I could slip and fall. You need to define your definition of milder weather. I couldn't find the public comment from the other two sessions online anywhere for me to look at. I had a problem with being comparable to the RTS route to not travel to the location. I couldn't quite understand that. Like, if you wanted to go to the JCP to a play, the bus does go to the Jewish Home, it does come by the JCP, but does it not do that with Ashta (phonetic)?

I really would have had to -- there's really a whole list of stuff. Oh, the suspension thing, it doesn't say anywhere in it about it being used per calendar year, but when I looked at the example, it had like one month and then you did find two months and then you get a second warning the third month later. So that needs clarification.

PRESENTER MEGAN MORSCH

Thank you, Paula. Leslie Hulbert.

AUDIENCE MEMBER LESLIE HULBERT

Hi. I'm Leslie Hulbert. I want to start out by thanking everyone who shared their concerns tonight because I agree with all of them. So thank you to all who have come.

I'm the mom of a 31-year-old son with a developmental disability and he, like many people, is trying to be employed in the community and transportation is the Number 1 obstacle for people with disabilities to be employed. So I really do support increasing the service capacity, but I think that probably more needs to be done around that. So I wanted to certainly make that strong call for really looking how we can help people with disabilities be employed and be more involved in their community.

The secondary that has been very frustrating is that we're not able to schedule a ride online. We have to call and I have been on the phone more than once for forty minutes trying to get through to an operator. It's just totally frustrating.

It's clearly not acceptable, because individuals who have difficulty with articulation or with any other reason that they would not be able to use their voice to schedule a ride. I just don't see how that meets the FDA guidelines of accessibility. I very much like that both options be available, both being able to schedule a ride online, as well as being able to do it with voice. Thank you.

PRESENTER MEGAN MORSCH

Thank you. Mrs. Morales.

AUDIENCE MEMBER MRS. L. MORALES

Thank you. I would like to have a set of rules and regulations on what you can do and what you can't do and what is expected. On the bus and also on the Access bus some places that I cannot -- the bus will not take me and I have to depend on the Access. Some places it's like a short distance and I get on the bus and I'm asked all different kinds of questions and it's like: Well, this is not the policy and that's not the policy. Then they will call someone to the bus and say: This is not permitted. One incident that I had is my great-granddaughter sometimes stays to help me out, but she's not old enough or she can't help you. But I've got carpal tunnel, my legs give out. I need help carrying groceries and stuff out of my car and putting them in and I can't afford an aide off the line. Sometimes the insurance might cover before "X" amount of time. Sometimes it won't cover it at all. So I need to know what my rights are on both the bus and the Access and more, you know, respect given when you get on the bus. And if you don't -- like, I don't have -- what are them beepers that you drive along in the grocery store? And I'm trying to get on and I'm more stable with my shopping cart. And I get so many different complaints, you know. And it's like: You can't take up this amount of seat and you can't take up that amount of seat or you have got to put your cart up, but if you can't reach to put it up there and you're out and it's going to cost you for the whole day. So you got everything in the same neighborhood and you medically sick. So I need to have this be shown. I need to know my rules and regulations. Thank you.

PRESENTER MEGAN MORSCH

Salena Boyd.

AUDIENCE MEMBER SALENA BOYD

Here. Salena Boyd, 51 Phelps Avenue, Rochester, New York.

Ms. Morales has been my friend for over thirty years, but what she failed to tell you is that she was viciously attacked by a pregnant woman who paid for one seat while her child took up another one and the child's bookbag took up another one. And when she tried to access the seat with the bookbag, the woman came from a strange place with her and knocked her down and Ms. Morales went into an asthma attack and the asthma attack went from a pneumonia and she has been three months now struggling, trying to get over what happened to her on the bus.

Now, as for Salena Boyd, on October 30, 2017, at approximately 3:13 p.m., an RTS driver picked me up at the Unity Building, 2655 Ridgeway Avenue, Greece. And I was his first pick up. He proceeded to pick up and drop off six people. When I go there it is for therapy. I drink a lot of water.

I needed to use the bathroom. He refused to allow me to. This is very embarrassing, people, but I had to urinate on myself because the driver refused to allow me to stop his bus. And we picked up a passenger that came out of a building and he heard me plead. On three occasions I made a request of this driver: Can I use the bathroom? I didn't expect him to go off route, but right on route he could have allowed me to run into the building, because that's what the blind gentleman said to him. She could go inside my building. He said: No, I'm late.

So, Mr. Carpenter, I have sent this letter to you. I have not received anything back from you. And it is signed here. And before you leave I would like to hand this letter to you that there has been no response to. Thank you very much.

PRESENTER MEGAN MORSCH

Thank you. Rene is the last speaker.

AUDIENCE MEMBER RENE LATORRE

Rene Latorre, Director of Advocacy and Consumer Affairs and I'm speaking on behalf of the Association for the Blind and Visually Impaired.

Joe, Bill and Megan, thank you very much for the opportunity to speak tonight.

I wanted to start out on a positive. I think since the last plan update wait times have definitely improved when you're waiting on the phone for customer service representatives. On-time performance is better with the buses. That's improved. Professionalism of the customer service department is better.

However, I do want to go over a couple of concerns that we have. This proposed plan that was posted on the website, you go to that link and it's very inaccessible. It's a PDF file. So, in order to review the transportation plan, it was very difficult. I had to get that information from a person who e-mailed it to me and sent twenty-one separate documents. The informational meetings are not adequately providing information that our advisors need to hear. It was a very vague and brief overview. I don't mean to be critical, but if you look at the transportation plan, it is very lengthy and it goes into a lot of detail that is not drawn out in these informational meetings. So I do invite people to please read your transportation plan before we print a final comment. I couldn't agree more that it should be extended, because it was inaccessible.

Communication is a difficulty with RGRTA, especially for us folks who are blind and visually impaired or anyone who needs an alternate format. That information is not readily provided. So people who are being suspended or being threatened of losing anything, they get a print letter in the mail. A lot of folks live independently and don't have someone to read information to them. That is a problem. Consistent information, policies that are consistent across the board. They seem to change all the time depending on who you're talking to.

Subscription rides are a problem. According to the transportation plan, it looks like there are very, very restrictive new policies being implemented that you can't cancel up to under five percent. If you have a one-way subscription, that means you can only miss one time per month. I think most people would be hard pressed to say, especially those of us who work, that you are never sick, never vacation, you don't have a sick child you need to go home to, you never leave early, only one time a month. That would be difficult for most people. Also, you should be eligible to be on the subscription six months of no cancellations for any reason, even advanced, even excused. That's unreasonable. I would ask and urge that the Board of Commissioners reconsider that and edit that in their transportation plan. Same thing with cancellations. It's too restrictive on what you can cancel. An advanced cancelation – I understand no-shows, we want to crack down on those, yes -- but the advanced cancellation with plenty of time, that needs to be a little bit more

Door to door, we just ask that people have door to door across the board. If that is what they need, some of us folks need it, they don't have to ask for it every single time. Thank you for listening.

PRESENTER MEGAN MORSCH

Thank you. Everyone has spoken. Now, we are going to talk about what is next. Thank you for everyone that provided their feedback. All right. You still have time to submit your comments until 5:00 p.m. on Tuesday, December 5th. There are specific instructions on how you can submit it in the back of the room. So if you want take that flyer. We will contact everyone afterwards with all of the responses and then we will take all of your feedback into consideration. At this time, I will have Bill come up and close out the Public Hearing for us.

AUDIENCE MEMBER

Is that information in Braille?

PRESENTER MEGAN MORSCH

It's not, but we can send it to you.

PRESENTER BILL CARPENTER

Thank you all for coming. The first thing I want to say, based on the comments that I've heard today, we want to extend the comment period until the first Friday of January, which I think is January 5, 2018. And we will get those links on the website that I've heard about. That's an issue that's not our intent, but we want to get that information out there. We want to have your feedback very much. So, again, this is a process, specific guidelines we need to follow on how this gets conducted. All of your comments will be part of the transcript. When this plan goes to our Board all your comments will be included. So to the extent my name came up in a favorable light, my Board will tell me. To the extent that someone sends me a letter, in the most embarrassing of situations, I will also get to explain that as well. But all of your comments will go to the Board. And, with that, I'll close the Public Hearing. Thank you.

(Whereupon the Public Hearing was adjourned at 5:52 p.m.)

End of the Transcript of the Public Hearing for Proposed Paratransit Plan Updates, November 28, 2017 in Exhibit 13.

End of Exhibit 13.

End of Exhibits for Section 4.

# Section 5: Efforts to Coordinate with Other Entities

At this time, no other public transportation entities in Monroe County have overlapping or contiguous service areas or jurisdictions subject to the complementary paratransit requirements of 49 CFR Subtitle A, Part 37, Subpart F. However, R G R T A is part of the Genesee-Finger Lakes Region Coordinated Public Transit-Human Services Transportation Plan Update reports. Refer to Subsection 6.2 Survey of Existing Paratransit Service for details.

End of Section 5

# Section 6: Endorsements or Certifications

This section describes the applicable certifications, which include the Annual Certifications and Assurances, the survey of existing paratransit service, the Metropolitan Planning certification, and the R G R T A Board Resolution.

## 6.1. FTA Fiscal Year Certifications and Assurances

In March 2018, R G R T A’s Authorized Representative assured that R G R T A will comply with the laws, regulations, and requirement so that no person in the United States will be denied the benefits of, or otherwise be subjected to discrimination in, any U.S. DOT or FTA assisted program or activity (particularly in the level and quality of transportation services and transportation-related benefits) on the basis of disability (Category 01. Required Certifications and Assurances for Each Applicant, 01.D. Nondiscrimination Assurance). Exhibit 14 Certifications and Assurances provides an example of this certification. When the certifications and assurances for the fiscal year 2019 are available, they will be included in the Plan in Exhibit 14.

## 6.2. Survey of Existing Paratransit Service

A survey of paratransit service in the R G R T A service area has been completed using the [Genesee-Finger Lakes Region Coordinated Public Transit-Human Services Transportation Plan Update](https://www.dot.ny.gov/divisions/policy-and-strategy/public-trans-respository/GTC_coor-plan.pdf) completed in 2011 by the region’s MPO, Genesee Transportation Council. The plan was updated in February 2016 ([2016 Addendum Genesee-Finger Lakes Region Coordinated Public Transit-Human Services Transportation Plan](https://www.dot.ny.gov/divisions/policy-and-strategy/public-trans-respository/CoordinatedPlan_Feb.%202016Addendum.pdf)). The addendum was coordinated through the Genesee Transportation Council and utilized a Project Steering Committee representing the following entities: Monroe County Office of the Aging, City of Rochester Department of Neighborhood and Community Development, Community Action of Orleans and Genesee, Arc of Yates, Medical Motor Service, Finger Lakes Health Systems Agency, Livingston County Department of Planning, Arc of Monroe, Arc of Livingston-Wyoming, Center for Disability Rights. The 2011 plan and the 2016 addendum list the region’s service transportation providers, including R G R T A. The analysis of available resources and demand for services demonstrates that R G R T A is part of the coordinated transportation plan for A D A riders.

## 6.3. Metropolitan Planning Organization (MPO) Certification

The MPO is Genesee Transportation Council (GTC) and the Executive Director shall coordinate the review and subsequent activities to certify the Plan upon submission. The resulting certification will be included as Exhibit 15 to this Plan after it is performed.

## 6.4. Board Approval

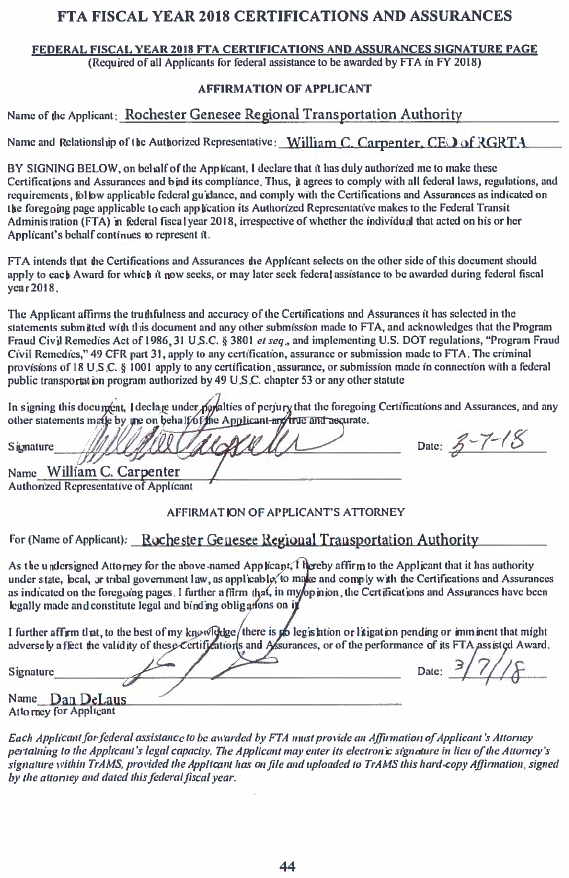
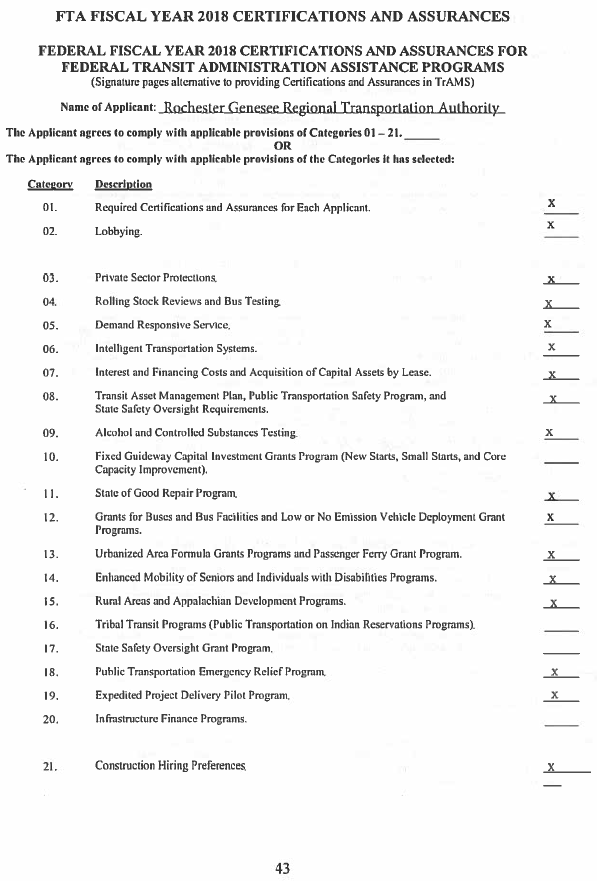
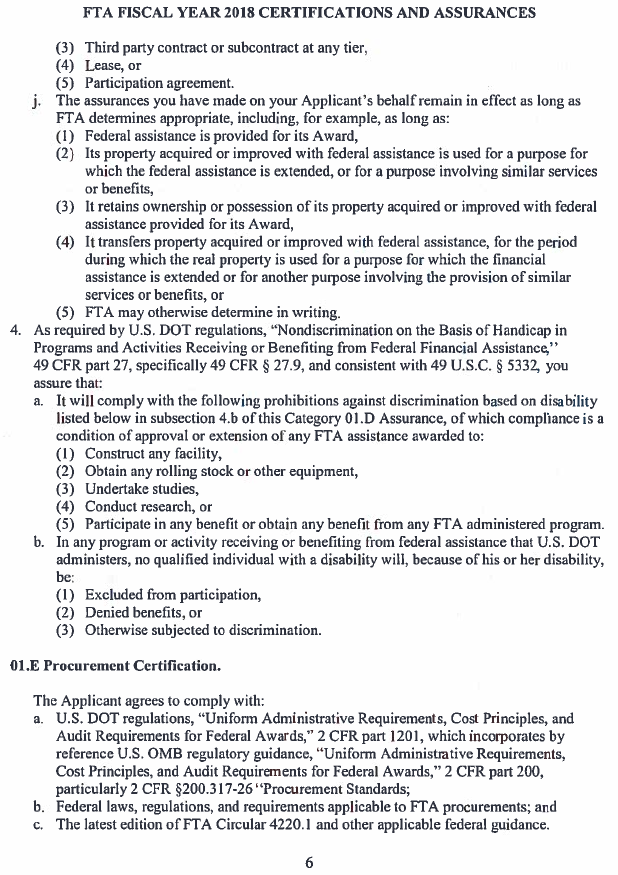
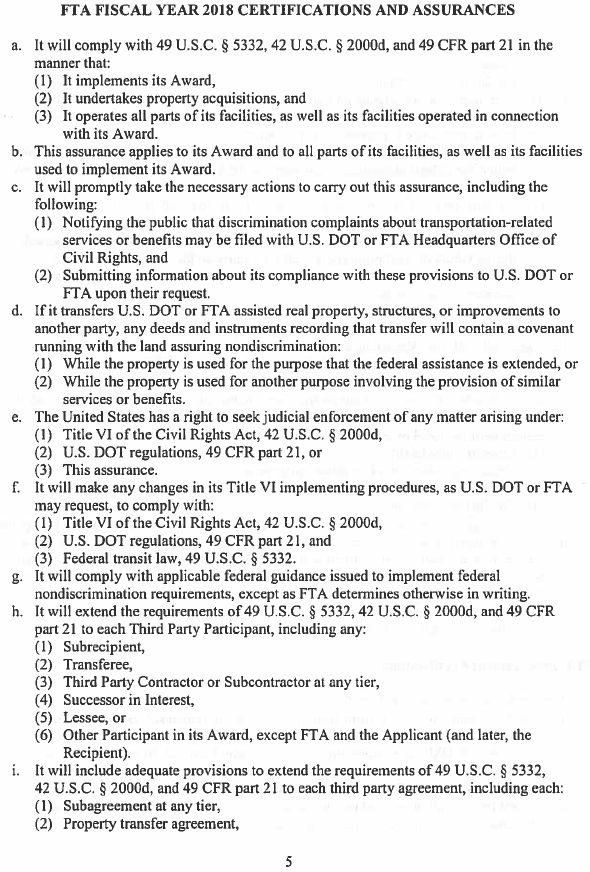
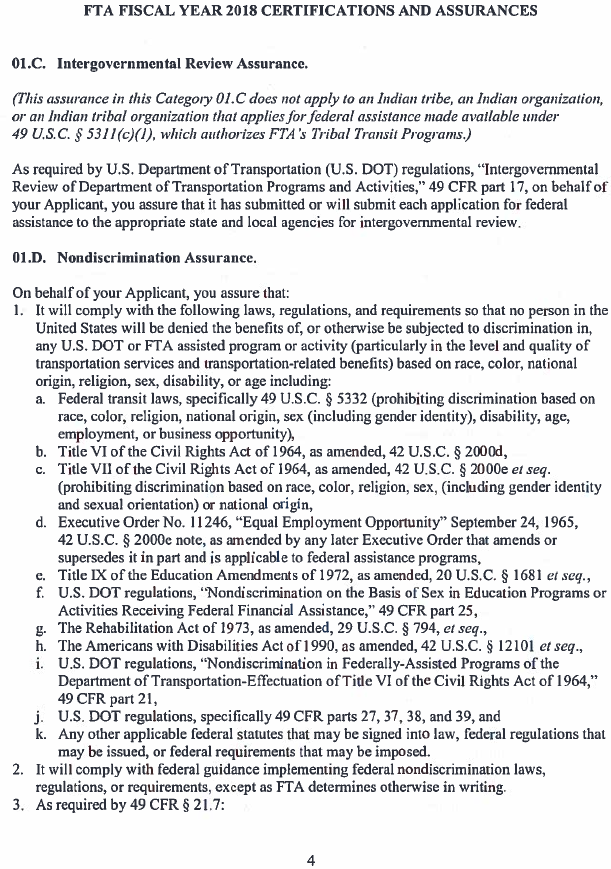
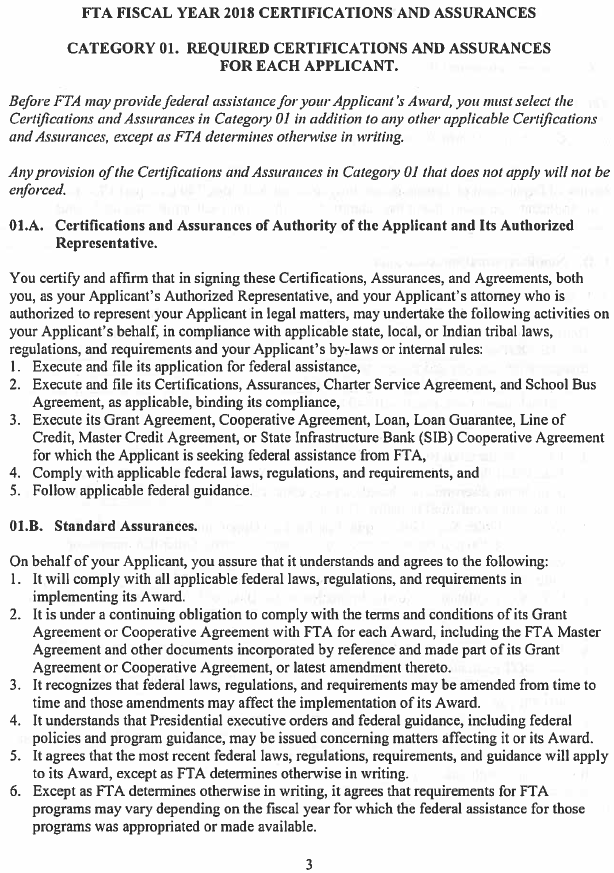
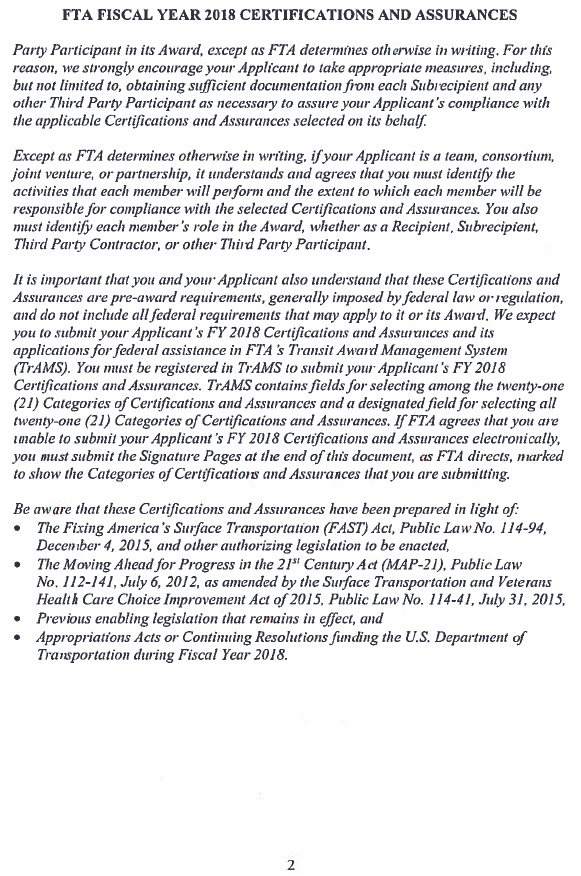
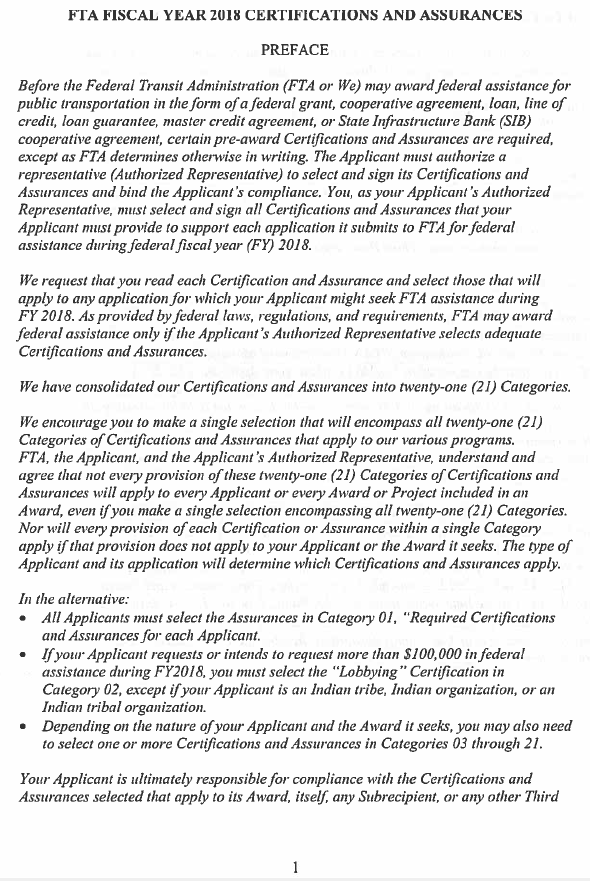
The Plan must be presented to the R G R T A Board of Commissioners for approval. The most current signed resolution will be included as Exhibit 16 to this Plan after it is performed.

Exhibits for Section 6

The exhibits included in Section 6 are Exhibit 14: Certifications and Assurances, Exhibit 15: MPO Certification and Exhibit 16: Ratified Board Resolution.

Exhibit 14: Certifications and Assurances

This exhibit contains scanned pages of the FTA Fiscal Year 2018 Certifications and Assurances document. The scanned pages include the Preface (pages 1 and 2), and Category 01. Required Certifications and Assurances for Each Applicant (pages 3 – 8). The category includes subsection 01.D. Nondiscrimination Assurance. The scanned pages also include the listing of categories R G R T A agrees to comply with and the signature page (pages 43 and 44).



The subsection 01.D. Nondiscrimination Assurance specifically states that the Applicant (R G R T A) will comply with laws, regulations, and requirements so that no person in the United States will be denied the benefits of, or otherwise be subjected to discrimination in, any U.S. DOT or FTA assisted program or activity (particularly in the level and quality of transportation services and transportation-related benefits) based on race, color, national origin, religion, sex, disability or age. It references federal transit law 49 U.S.C. § 5332, The Americans with Disabilities Act of 1990, and U.S. DOT regulations “Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving or Benefiting from Federal Financial Assistance,” 49 CFR part 27, specifically 49 CFR § 27.9.

End of Exhibit 14.

Exhibit 15: MPO Certification

This exhibit will contain the scanned MPO Certification of Paratransit Plan after it is performed and signed by the Authorized Official, Director James Stack. The certification says that “The Genesee Transportation Council hereby certifies that it has reviewed the A D A paratransit plan prepared by the Rochester Genesee Transportation Authority for the subsidiary RTS Access as required under 49 CFR Part 37.139(h) and finds it to be in conformance with the transportation plan developed under CFR part 613 and 23 CFR part 450 (the FTA/FHWA joint planning regulation). This certification is valid for one year.”

End of Exhibit 15.

Exhibit 16: Ratified Board Resolution

This exhibit will show the scanned pages of the ratified (signed) resolution indicating that the R G R T A Board of Commissioners has approved and authorized the RTS Access Paratransit Plan for implementation in the Summer of 2020 after the Board Approval occurs.

End of Exhibit 16.

End of Exhibits for Section 6

# Section 7: Plan Updates

Customers, agency representatives, and members of the public can submit comments and suggestions through <http://rts.force.com/RTSContactUs> or (585) 288-1700.

Annually, operations management for RTS Access will review the processes/procedures identified in the Plan and evaluate RTS Access for comparable paratransit service according to the requirements in 49 CFR Subtitle A, Part 37, Subpart F of the federal regulations.

## 7.1. Non-substantive Changes to the Plan

R G R T A may elect to update this Plan at its discretion for planning purposes, to correct errors, or to document improvements or clarifications to operational practices. Such changes will be considered non-substantive. The changes will go through an internal review and approval process using the R G R T A document management system and will require the participation and acceptance of the Chief Operating Officer and Chief Executive Officer. The updated Plan will be available to employees through the company intraweb and posted on the public website [www.myrts.com](http://www.myrts.com).

## 7.2. Substantive, Required Changes to the Plan

R G R T A is required to update this Plan if the Authority or the FTA identifies an area of non-compliance, or if the Authority introduces new fixed route service that requires complementary paratransit service, or if the Authority proposes a change to service criteria for complementary paratransit—such as service area, response time, fares, hours and days of service, or additional service. Such changes will be considered substantive and will require public participation, opportunity for public comment, and at least one public hearing. R G R T A will also obtain the certifications and endorsements required under §37.139(h), including but not limited to a resolution adopted by the R G R T A Board of Commissioners authorizing the plan and a certification of conformance by the Genesee Transportation Council. The updated Plan will be available to employees through the company intraweb and posted on the public website [www.myrts.com](http://www.myrts.com).

End of Section 7

End of RTS Access A D A Paratransit Plan for Summer 2020