Paratransit Plan Narrative

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# Description of Submitting Entity

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

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

RGRTA Mission Statement: We are our community’s provider and partner for safe, reliable, and convenient public transportation that people can build their lives around.

RGRTA Vision: The preferred Transportation choice.

# Introduction

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

RGRTA 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, RGRTA 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. RGRTA 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 RGRTA to develop a Paratransit Plan, to submit the Plan to the Federal Transportation Administration (FTA), and to perform updates annually. RGRTA uses the RGRTA ADA 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 ADA-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, RGRTA is still required to certify to the FTA annually that it has met and continues to meet the requirements under Subpart F. RGRTA performs this certification in the annual FTA Fiscal Year Certifications and Assurances. Exhibit 12 Certifications and Assurances provides an example of this certification.

# Section 1: Description of RGRTA’s Fixed Route System and Paratransit Services

This section provides an overview of the RGRTA business structure and describes the types of service, the fare structure, and the days/hours of service for RTS and RTS Access. This section closes with an overview of the upcoming system redesign study, which will have future implications to fixed route and paratransit service.

# 1.1. Business Structure Overview

The Rochester Genesee Regional Transportation Authority (“RGRTA” 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 is charged with the continuance, further development, and improvement of public transportation and other related services within the Genesee/Finger Lakes region. RGRTA is comprised of eleven separately incorporated business units. However, only one—the Regional Transit Service (“RTS”) in Monroe County—provides fixed route service. RTS Access provides complementary paratransit service in Monroe County. Other transit business units (“subsidiaries”) provide demand response (“Dial-A-Ride”) service and route deviated service.

 Rochester Genesee Regional Transportation Authority (RGRTA) is the Public Authority responsible for overseeing the daily operation of the subsidiaries.

Regional Transit Service, Inc. (RTS) provides fixed route service in Monroe County.

RTS Access (Lift Line, Inc.) provides complementary paratransit service in the RTS service area in Monroe County.

The following subsidiaries provide demand response 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. (GTCS)

The City of Rochester is the region’s economic and cultural center. Most current and potential riders live and work in Monroe County and the City of Rochester. Approximately 63% of the population in the Authority’s service area lives in Monroe County, and this percentage is expected to hold steady over time. The region will see approximately 2% population growth with a demographic shift to an older population. The percentage of adults aged 65+ could increase as much as 40% in the coming decades. This information is from the 2016 and 2011 Coordinated Public Transit-Human Services Transportation Plans from the Genesee Transportation Council. This Plan will compare RTS fixed route service and RTS Access complementary paratransit service.

# 1.2. Description of RTS Fixed Route Service

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 RGRTA headquarters. The RTS Transit Center is located at 60 St. Paul Street, Rochester, NY 14604 (Monroe County) and serves RTS buses. All downtown fixed RTS routes begin or end at the RTS Transit Center, which allows the same RTS bus and/or Bus Operator to serve more than one fixed route (interlining).The concentration of transit service occurs within the Rochester City limits. Created in 1969, RTS is the largest subsidiary of the Authority, providing 41 fixed routes throughout Monroe County and adjoining counties. The annual ridership is 16,561,701. RTS operates 219 buses and has 624 employees. The service area population is 749,600. All service will be monitored at a route level for ridership, on time performance, cost recovery, pass-ups, and maximum load. If any route does not meet standards for the particular service type, the schedule will be adjusted to improve that measure, the route may be reworked, or as a last resort, the route may be eliminated. The service types are Urban All Day, Express Transfer, ROC-it, Urban Supplemental, and Suburban.

# 1.2.A. Urban All Day Routes for Fixed Route

The Urban All Day route network operates radially between the RTS Transit Center and one or more peripheral endpoints located in the City or in adjacent suburban towns having urban density characteristics (greater than 3,600 persons per square mile). Urban All Day routes are characteristically full-service routes. They operate at high frequencies, generally provide all-day service, and operate on weekends. An urban route does not operate in express mode.

# 1.2.B. Express Transfer Service Routes for Fixed Route

Express Transfer Service Routes are regularly scheduled urban routes that are available to the public but are designed or modified to accommodate the needs of school students and personnel.

# 1.2.C. ROC-it Routes (Limited Stop Service) for Fixed Route

Limited Stop Service routes overlay along existing Urban All Day Routes that connect the RTS Transit Center to high ridership locations. ROC-it Routes differ from the Urban All Day system in frequency, temporal coverage, line speed, and type of ridership by serving a limited subset of stops along the same corridor as an existing Urban All Day Route.

# 1.2.D. Urban Supplemental for Fixed Route

The Urban Supplemental route network operates radially between the RTS Transit Center and one or more peripheral endpoints located in the City or in adjacent suburban towns having urban density characteristics (greater than 3,600 persons per square mile). Urban Supplemental routes differ from the Urban All Day system in frequency, temporal coverage, line speed, and type of ridership. Urban Supplemental routes may operate in express mode and during non-peak hours. The purpose of this service is to provide coverage to supplement the Urban All Day fixed routes.

# 1.2.E. Suburban Routes for Fixed Route

The suburban route system has a similar orientation as the urban system. Routes are radial in structure and provide local service to portions of the community exhibiting non-Urban density characteristics (less than 3,600 persons per square mile). Suburban routes differ from the urban system in frequency, temporal coverage, line speed, and type of ridership. Suburban routes may operate in express mode and during non-peak hours.

# 1.2.F. Experimental Routes for Fixed Route

Experimental routes are designated by RGRTA at the time of creation as being “experimental” if they are developed to test the viability of a new route structure. In no case will an “experimental” route remain experimental for more than 12 months.

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

RTS fixed route service runs from 4:41 AM to 2:04 AM on weekdays, from 4:53 AM Saturday morning to 3:18 AM Sunday morning, and from 4:54 AM Sunday morning to 2:09 AM Monday morning. The RTS Transit Center facility is open Monday – Friday 4:30 AM to 1:00 AM and Sat – Sun 5:30 AM to 1:00 AM. Customer Information Desks at the Transit Center are staffed Monday – Friday 6:15 AM to 7:45 PM. The RTS Administration Building lobby is open to the public Monday – Friday 8:00 AM to 5:00 PM and is closed on weekends and holidays. RTS Customer Service is staffed to take calls Monday – Friday 7:00 AM to 6:00 PM.

# 1.2.H. Fare Structure for Fixed Route

The base cash fare is one dollar. When boarding a bus, the person must pay a separate fare unless he or she has a pass for multiple rides. Unlimited ride pass purchases are subject to a maximum monthly purchase of 50 passes per organization. Organizations needing more than 50 passes per month require an agreement with RTS to ensure sufficient bus capacity is available for the intended purpose(s) of the passes. Cost for additional passes will be the actual cost to provide the necessary capacity, or the unit cost of the passes, whichever is greater.

This is a list of the fares when riding RTS fixed route.

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.

31 Day Unlimited Ride Pass is $56.00.

31 Day Child/Senior/Disabled Pass is $28.00.

1 Day Unlimited Pass is $3.00.

1 Day Child/Senior/Disabled Pass is $1.50.

5 Day Unlimited Pass is $14.00.

5 Day Child/Senior/Disabled Pass is $7.00.

1 Ride Pass is $1.00.

2 Ride Pass is $2.00.

2 Plus 2 Pass is $2.00

Stored Value Pass is $10.00.

Cash Fare when using a Reduced Fare Card during Off-peak Hours is $0.50.

Senior/Disabled 1 Ride Pass is $0.50.

Senior/Disabled 1-Day Unlimited Pass is $1.50

End of list.

Senior citizens age 65+ must show the Bus Operator a photo ID, Medicare Card, or a Reduced Fare Card to obtain the senior rate. Senior citizens age 90 or older can apply for an RTS Lifetime Pass, which allows them to ride fixed route free any time during service. Disabled persons who are not certified paratransit eligible must show the RTS Bus Operator a Reduced Fare Card for the disabled rate. Certified paratransit eligible customers must show their RTS Access ID Smartcard to the RTS Bus Operator or tap the smartcard on the RTS bus farebox reader to ride free of charge. Children age five and under ride free with a limit of three children per each fare-paying adult. No fare is charged for service animals traveling with their handlers or pets traveling with their owners (pets must be in carriers). Bus Operators do not handle money or dispense change. The fare box accepts coins and $1, $5, $10, and $20 bills. If customers insert a bill amount greater than the fare amount, the fare box will dispense a card with the remaining balance, which can be used for future rides. Customers can purchase fare media at authorized points of distribution, from the fare box, at the RTS Administration Building, and at ticket vending machines in the Transit Center.

# 1.2.I. 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 the purpose of comparing RTS with RTS Access. RTS fixed route service complies with the ADA accessibility requirements because 100% of its vehicles are accessible and all new routes are accessible. The municipality, rather than RGRTA, often determines the accessibility to the area (i.e. curbing, crosswalk, concrete pad) where a bus stop is located.

All 219 RTS fixed route buses are accessible. They accommodate wheelchairs and other mobility devices; 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 who have vision loss. Free training sessions are offered periodically to people who would like to learn about using fixed route service. Priority seating is located at the front of RTS buses for seniors and people with disabilities. In accordance with the ADA, Bus Operators may ask (but not require) other customers to offer these seats to seniors and people with disabilities. RTS buses reserve areas where mobility devices, such as wheelchairs, can be secured for the people who need them. Bus Operators are required to ask customers to provide access to those areas for people using mobility devices. 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. Bus Operators are required to secure all mobility devices. Aides or other customers are not allowed to secure mobility devices. 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. Manual wheelchairs must be locked and automated mobility devices must be turned off. 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. The Bus Operator is required to unsecure mobility devices after the ramp lowers. Aides or other customers shall not release the securements on mobility devices. 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).RGRTA has contracted with Transportation Management & Design, Inc. (TMD) and Highland Planning to conduct a system redesign study called Reimagine RTS. Abt Associates will initiate an origin to destination survey to gather information about where customers start and end their bus trips. Highland Planning is developing a public outreach and engagement plan for the system redesign study. The goal of the Reimagine RTS outreach plan is to conduct as much public outreach and gather as much input as possible to help identify areas of improvement for fixed route locations and components.

# 1.3. Description of Complementary ADA Paratransit Service

This subsection describes the existing paratransit services 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 ADA 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 192,820. RTS Access operates 53 buses and has 113 employees. The service area population is 749,600. 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

Paratransit trips occur within the RTS Access service area. Customers shall call RTS Access to book rides. 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 ADA Certification Coordinator when applying for paratransit eligibility certification or recertification. Those who are already certified paratransit eligible may discuss adding this information with an RTS Access Scheduler or notify the

ADA Certification Coordinator during the recertification process. 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 that might be provided by a personal care attendant.

# 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. Exhibit 3 of the Plan provides the procedures and processes for Subscription Service.

# 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.

# 1.3.D. Supplemental Service

RTS Access provides a supplemental service 1½ miles beyond the ADA defined ¾-mile service area, for a total service area of 2¼ miles on each side. The supplemental service is provided for an added cost and only if space is available after accommodating requests for service within the ADA-defined service area. If space is available, supplemental trips can be scheduled Monday through Sunday and on holidays. RTS Access will expect customers who wish to use the supplemental service to accept the possibility of unavailable space when attempting to reserve a trip and pay the supplemental rate upon boarding for the bus for a scheduled supplemental trip. Exhibit 2 of the Plan describes the service area and supplemental service area for weekdays, Saturdays, and Sundays.

# 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 on this topic are provided 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-area service and same-day service, RTS Access will charge customers riding within the regular ADA 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. More details on this topic 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 of this Plan.

# 1.5. System Research in Monroe County

In June 2017, the RGRTA Board of Commissioners authorized a study in Monroe County to determine the feasibility of a redesign of the RTS route structure to improve service in accordance with changing demographics, demands, economic trends, and transportation trends. The study is expected to run from October 2017 to December 2018.Recommendations from the study will factor into any changes RGRTA makes to the RTS fixed route service network.

# 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. Based on the use of paratransit services over the past 4 years, RGRTA estimates that the trend for RTS Access paratransit will remain consistent and that demand will continue to increase. RTS Access tracks each ride for reporting purposes. In fiscal year 2012-13, the number of rides was 169,354. By fiscal year 2016-17, the numbers have increased to 198,640 rides. RGRTA 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. RGRTA’s tactic to study a redesign of the route structure in Monroe County will involve two separate studies to evaluate the existing fixed-route system in Monroe County and assist in the development of a system design that can improve service and address new challenges and demands. Transportation Management & Design, Inc. (TMD) will conduct the system redesign study. Abt Associates will conduct the Origin-to-Destination Survey to provide customer travel pattern information as an input to the system redesign study.

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

RGRTA 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 and proposes the following improvements and clarifications only to the operational practices that support the existing service.

# 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 has referred to the provision of assistance beyond the curb as “enhanced service.” RTS Access intends to discontinue using the term “enhanced service.” RTS Access will refer to the practice of providing assistance beyond the curb as a reasonable modification. A request for “door-to-door” assistance will be considered a reasonable modification request. The process that RTS Access follows for a reasonable modification request is described in Subsection 2.5.A. The process for complaints is described in Subsection 2.5.C.

# 2.2.B. Service Area

There are no changes planned for the service area at this time. However, if a service change to RTS fixed route affects the RTS Access service area RTS Access proposes issuing a written notification to give affected RTS Access customers adequate time to make alternate arrangements for transportation, either in general or to specific locations within the RTS Access service area. The notification procedure is provided in Exhibit 4 of this Plan.

# 2.2.C. Subscription Service

RTS Access recommends giving customers written material about the qualifications, allowances, and restrictions for subscription service. The written material will explain the expectations for using subscriptions and will identify which actions will result in the loss of a subscription. RTS Access will expect customers to follow the rules outlined in the Paratransit No-Shows and Service Suspensions procedure, to use their subscription trips regularly, and to notify RTS Access when they no longer need the subscription. RTS Access intends to reduce the required number of repeat trips from three trips per week to two trips per week, allowing more customers to qualify for subscriptions. Exhibit 3 of the Plan provides the procedures and processes for Subscription Service.

# 2.2.D. No-Shows and Service Suspensions

RTS Access concludes that the current practice does not adequately accomplish the purpose of the suspension process, which is to deter or address chronic no-shows. RTS Access also concludes that the criteria and calculation process was not communicated clearly and had the potential for inconsistency. RTS Access proposes using 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. RTS Access proposes presenting the written methods and service suspension penalties in simpler language to help customers understand the rules, to help customers avoid service suspensions, and to help employees apply the process consistently. The written material separates the concept of service suspensions based on no-shows from the concept of service suspensions based on prohibited conduct. Information about suspensions based on prohibited conduct will be provided in separate material. Exhibit 5 of the Plan provides the procedures and processes for No-Shows and Service Suspensions.

# 2.2.E. Eligibility

RTS Access intends to revise the eligibility application based on input from applicants and customers. The application will have fewer pages and more of the questions will use a multiple-choice format. The design will encourage applicants to keep all pages together and have the medical certification portion completed by a qualified medical professional. The application will include a checklist and instructions for submitting the completed application. When a person is certified paratransit eligible, the ADA Certification Coordinator will include a notification about his/her rights under Title VI along with the eligibility materials.

# 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 increased the OTP goal from 93.5% to 95.0%. RTS Access intends to include the internal operational procedures for calculating OTP in this Plan in Exhibit 7.

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

RTS Access is providing a written policy to explain the practice of providing return service. The policy explains 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. The policy also explains that 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 8 of the Plan provides the 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/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

It is important to emphasize that RTS fixed route service forms the basis for the paratransit service area. The RTS system map provides a visual of the base system that RTS Access will follow. The RTS Access service 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 route in the RTS system during the same hours and days of service in the RTS system. Within the core service area, RTS Access will provide service to areas entirely enclosed by fixed routes. All RTS Access trips must begin and end within the service area. 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. It will be the responsibility of customers living outside the service area to arrange for alternate transportation to and from the paratransit service area. Customers who live within the 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, the coverage of the service area will vary. Exhibit 2 shows that the RTS Access buses serve the entire service area during weekdays, but Saturday and Sunday service runs in a smaller portion of the service area. Similarly, 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. A service change that affects the RTS fixed route service area will affect the RTS Access service area similarly. 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. If the approved change affects RTS Access customers, RTS

Access will notify them 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 4 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 or Dispatchers) to request rides (“reserve,” “book,” or “schedule”). RTS Access will not allow Bus Operators to reserve rides. The Dispatchers or 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 Sunday. The Scheduling office holiday hours are from 8:00 AM to 1:00 PM; the office is closed on Christmas day and open from 8:00 AM to 5:00 PM on the day after Thanksgiving. 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. RTS Access will accommodate same-day trip reservations only if space is available; otherwise, customers must reserve the ride at least one day before (“next-day”) to ensure a ride. Rides will be reserved for origins and/or destinations within the RTS Access service area. A round trip has two booked rides—outgoing and return—and each must be requested and reserved explicitly with the RTS Access staff. RTS Access will require customers to stay a minimum of one hour after a drop-off at any destination. RTS Access will allow customers to book a ride up to seven days in advance. RTS Access Schedulers will allow customers to book up to six rides (three round trips) in advance during the same phone call. When booking a ride, the RTS Access Scheduler or Dispatcher will explain to the customer that his/her travel time on the bus could be up to 1 hour and will ask the customer “What time do you want to be picked up?” After negotiating the pickup time, the Scheduler or Dispatcher 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 ten minutes before the pickup time and end ten 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 pickup, the Bus Operator must wait until the pickup period starts (1:20) and—if the customer has not appeared for boarding—wait for a full five minutes to elapse (1:25 PM). If the bus arrives at 1:30 PM 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 1:39 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 11 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 expect customers to use their booked rides. RTS Access will expect customers to cancel in advance any ride they do not need. RTS Access will expect customers to cancel a ride at least two hours before the pickup period starts. A cancellation made at least two hours in advance of the pickup period will not carry any penalty. Customers must cancel 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. A late cancellation will occur if the customer cancels the ride less than two hours ahead of the pickup period. When cancelling a round trip, the customer will need to explicitly cancel the pickup ride and the return ride; return rides will not be cancelled automatically. RTS Access will establish thresholds for missed rides and late cancellations. If a customer meets or exceeds the thresholds, RTS Access will apply a penalty. Exceptions will apply if customers miss rides for reasons beyond their control. The thresholds are explained in detail in Exhibit 5. RTS Access will document any instance when it is unable to accommodate a ride request made the previous day, cannot schedule the ride within a one-hour window of the time requested, or is late for a scheduled pick up.

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

With the exceptions of supplemental-area service 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. Fares in the supplemental service area are mileage based fares plus $6.00 for each one-way trip. Total cost per trip is determined by the distance traveled.

For a distance of 1 mile or less from origin the fare is $1.50.

A distance of 1 to 3 miles costs $1.75.

A distance of 3 to 20 miles costs $2.00.

A distance of over 20 miles costs $20.00.

Same-day service costs $6.00 in addition to the distance-based fare.

Supplemental-area service costs $6.00 in addition to the distance-based fare.

RTS Access will expect customers to pay the Bus Operator the exact fare each time they board. 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. RTS Access will not allow Bus Operators to accept round-trip fares. Bus passes in amounts of $18 or $20 will be available for purchase from any RTS Access Bus Operator, online, by phone, or from the RTS campus at 1372 East Main Street. 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/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.

Any applicant whose complete application is not processed within 21 days of receipt will be granted the ability to use paratransit temporarily until the eligibility decision is made. During the temporary period, must pay the appropriate fare for the trip and show a photo ID to board the RTS Access bus.

Any appellant whose appeal decision is not issued within 21 days of receipt 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.

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.

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 and must pay the RTS Access fare. During the same period, the applicant may ride RTS free. RTS Access will not charge a fare to a Personal Care Attendant (PCA) traveling with a customer, provided the PCA has the same origin and destination as the customer. RTS Access will allow one companion to pay the same fare amount as the customer provided the companion has the same origin and destination as the customer. On a space available basis, RTS Access will allow additional companions to travel with the customer from the same origin to the same destination and will charge each companion the same fare amount as the customer. RTS Access will not charge a fare for service animals traveling with their handlers or for pets traveling with their owners. Pets must be in cages that do not block the aisle during travel. Customers with conditional, seasonal, 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/show their RTS Access Photo ID Smartcard, they will be required to pay the fixed route fare when riding RTS fixed route. Applicants waiting for their eligibility decision must pay the RTS fixed route fare if they use fixed route. Applicants or appellants granted temporary eligibility while waiting for a decision may use RTS fixed route service free; in this circumstance, RTS Access may need to notify RTS of the arrangement and perform appropriate coordination.

# 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, and the number of people traveling (i.e. PCA or companion). 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. RTS Access will follow a Sunday schedule during the following holidays: New Year’s Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and the Day after Thanksgiving. If a redesign of the RTS fixed route structure is determined feasible, the span of service for RTS Access paratransit service will mirror the span of service for RTS fixed route service.

# 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 (10 minutes prior and 10 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. For fiscal year 2017-18, the RTS Access on-time performance goal will be 95.0%, based on the operational success of exceeding that goal during the previous fiscal year. In comparison, the RTS fixed route annual on-time performance goal will be 89.30%. Exhibit 7 of this Plan describes the procedures used for calculating on-time-performance.

# 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 3 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/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 modification(s) 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/RTS Access to make the necessary determinations in advance of the need for modified service. When doing so, RTS/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. RTS/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. A note on requests that require the bus to back up: 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/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/RTS Access will notify the customer and the Bus Operators that future requests requiring the bus to back up in that location will be denied, even if the original request was accommodated.

RTS/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 bag or package, RTS Access will consider the request a reasonable modification. Requests that would require the Bus Operator to make multiple trips or to carry several items fundamentally alter the Bus Operator’s function, and RTS Access will direct the Bus Operator to decline them. If a customer requests the Bus Operator to remain at a destination because the customer cannot be left alone without an attendant, RTS/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/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). If an RTS Access customer requests assistance from the curb to the door of the destination, it is important to distinguish door-to-door from door-through-door assistance. RTS Access will grant a reasonable request for door-to-door assistance as a reasonable modification to its curb-to-curb service. When providing door-to-door assistance, the path between the vehicle and destination entrance must be safe and accessible. When parked, the RTS Access vehicle cannot block or impede traffic and there must be a safe place to park on a public roadway or parking lot. RTS Access will not provide door-through-door assistance because RTS Access does not provide assistance beyond the door into the building or residence. If a customer believes RTS/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 through one of the following methods: Completing and submitting the Reasonable Modification Form to: RGRTA Legal Affairs Department, 1372 East Main Street, Rochester, NY 14609; or Attaching the completed Reasonable Modification Form electronically to the online Contact Us form <http://rts.force.com/RTSContactUs> and submitting the information. The form is available online at <https://www.myrts.com/Riders-Guide/ADA-Compliance#resmodnon>. The form can be requested by calling Customer Service or RTS Access Scheduling. Exhibit 6 of this Plan contains the forms. RGRTA will provide general assistance (585-654-0771) or language or disability assistance (585-288-1700) during administrative business hours. RGRTA will conduct a review based on the submitted facts, the written complaint, and ask additional questions if necessary. RGRTA 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.

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

RTS Access will ask customers to provide notification of their intent to ride with a service animal when booking a ride to help ensure adequate space is available for the service animal.

RTS/RTS Access Bus Operators will not take charge of a service animal, even if requested to do so, because caring for a service animal is the responsibility of the customer or a personal care attendant. 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. RTS/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. ADA 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 RGRTA may file a written, formal ADA Complaint by:

Completing and submitting the ADA Complaint Form to: RGRTA Legal Affairs Department, 1372 East Main Street, Rochester, NY 14609; or

Attaching the completed ADA Complaint Form electronically to the online Contact Us form <http://rts.force.com/RTSContactUs> and submitting the information.

The form is available online at <https://www.myrts.com/Riders-Guide/ADA-Compliance#resmodnon>. The form can be requested by calling Customer Service or RTS Access Scheduling. RGRTA will provide general assistance (585-654-0771) or language or disability assistance (585-288-1700) during administrative business hours. RGRTA will investigate complaints received no more than 180 days after the alleged incident. RGRTA will process complaints that are complete. Once the complaint is received, the RGRTA will review it to determine if RGRTA has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by RGRTA. RGRTA has 30 days to investigate the complaint. If more information is needed to resolve the case, the RGRTA 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, the RGRTA can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not an ADA violation and that the case will be closed. An LOF 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/he will have 30 days after the date of the letter or the LOF to do so. 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.

# 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.

1985—RGRTA established Lift Line Inc. (now RTS Access) to provide paratransit service.

1987—RGRTA adopted a Service Plan for accessible transportation.

1988—RGRTA reaffirmed support for the accessible service plan.

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

1993—RGRTA approved a Paratransit Plan update.

1994, 1995, and 1996—RGRTA approved a Paratransit Plan update documenting the results of ADA implementation in an effort to achieve full compliance.

2014—RGRTA adopted changes to the Paratransit Plan effective October 1, 2014: 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. Exhibit 9 of this Plan provides descriptions of the resolutions authorizing the actions identified in this timeline.

# 2.7. Multi-Year Budget 2017-2023

This subsection provides budget information as required in Subpart F, §37.139 (d) (6) of the federal regulations. 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. The Capital Improvement Plan has $200,000 allocated for 2017-18 for the RTS Access Campus Improvement project. The improvements programmed for fiscal year 2017-18 will include installation of cameras and access control, replacement of the fire alarm system, and repairs to concrete while the longer-term plan is formulated. RTS Access will replace buses throughout 2017 to 2023 to maintain the fleet in a state of good repair.

In 2016-17, RTS Access will replace 7 buses at a cost of $569,632.

In 2017-18, RTS Access will replace 10 buses at a cost of $876,954.

In 2018-19, RTS Access will replace 9 buses at a cost of $779,215.

In 2020-21, RTS Access will replace 15 buses at a cost of $1,346,566

In 2021-22, RTS Access will replace 14 buses at a cost of $1,320,046.

In 2022-23, RTS Access will replace 10 buses at a cost of $959,514.

# Section 3: Process for Determining ADA Paratransit Eligibility

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

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). RTS Access will apply the following policies and procedures for determining ADA Paratransit Eligibility: Paratransit Eligibility (policy), Application for Paratransit Eligibility Certification, Paratransit Appeal Process and Procedures, and Notice of Intent to Appeal Paratransit Eligibility Determination. Exhibit 10 of the 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 new application will include a checklist and instructions. 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.

# 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, 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) RGRTA wishes to solicit comments using the forum of a public hearing. RTS Access will include the report of public comments received, RGRTA’s responses to the comments and proposed changes on www.myRTS.com and as an exhibit to this Plan. RTS Access will follow the processes outlined in the RGRTA 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 4 provides the procedures and processes for public participation and describes the notification process.

# 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, RGRTA 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.

# 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 RGRTA Board Resolution.

# 6.1. FTA Fiscal Year Certifications and Assurances

In 2017, RGRTA’s Authorized Representative assured that RGRTA 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 12 Certifications and Assurances provides an example of this certification.

# 6.2. Survey of Existing Paratransit Service

A survey of paratransit service in the RGRTA service area has been completed using the Genesee-Finger Lakes Region Coordinated Public Transit-Human Services Transportation Plan Update 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). 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 RGRTA. The analysis of available resources and demand for services demonstrates that RGRTA is part of the coordinated transportation plan for ADA 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 13 to this Plan after it is performed.

# 6.4. Board Approval

The Plan must be presented to the RGRTA Board of Commissioners for approval. The most current signed resolution will be included as Exhibit 14 to this Plan after it is performed.

# Section 7: Plan Updates

RTS Access management and staff will seek to implement the modifications proposed to the operational procedures for No-Shows and Service Suspensions and Subscription Service during the first and second quarters of 2018. During Bus Operator In-Service Training, Operators will review the procedure for reasonable modifications, such as requests for door-to-door service.

The ADA Eligibility Coordinator will monitor incomplete eligibility applications or recurring errors in the application process throughout 2018-19, collecting input for improvements.

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

RGRTA 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 RGRTA 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

RGRTA 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. RGRTA will also obtain the certifications and endorsements required under §37.139(h), including but not limited to a resolution adopted by the RGRTA 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 the Paratransit Plan Narrative