Paratransit Plan Exhibits

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EXHIBIT 1: RTS SYSTEM MAP AND SCHEDULES

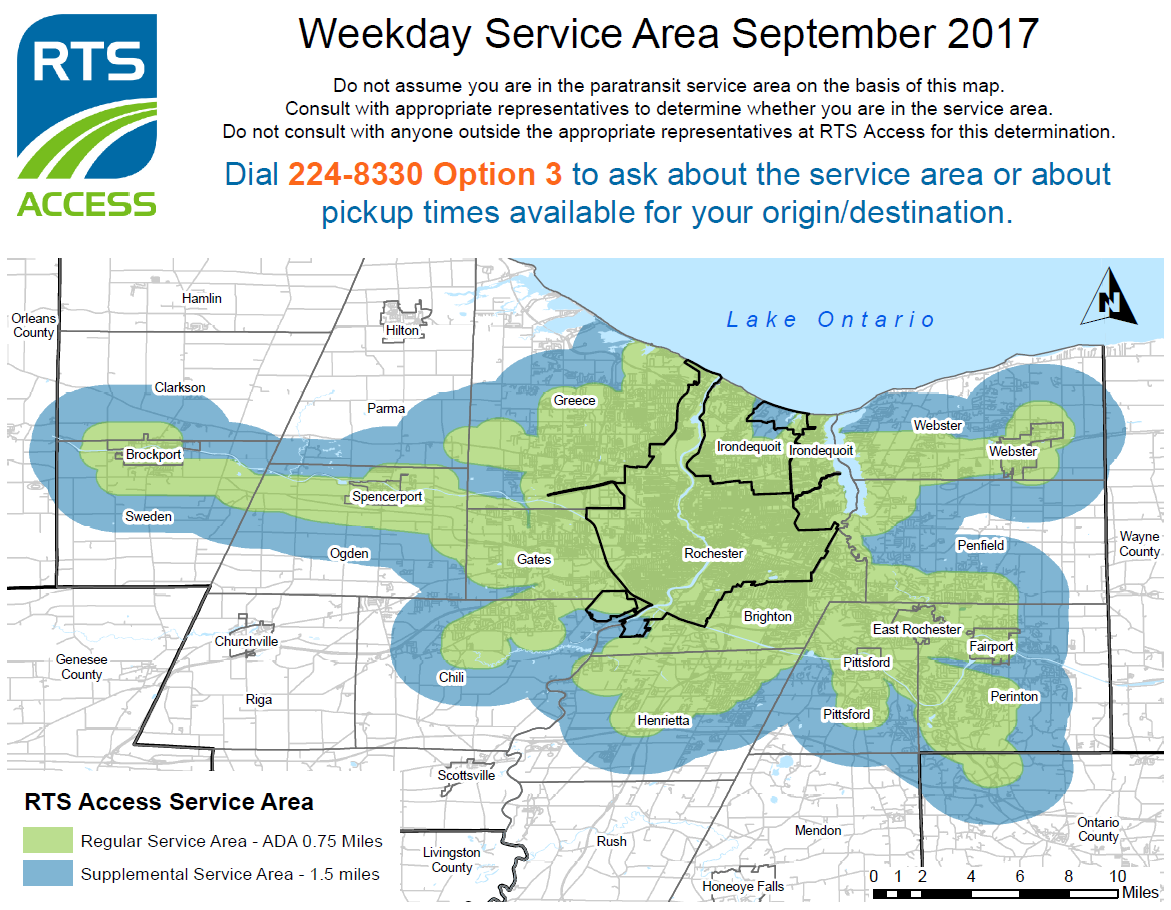
This exhibit provides the link to the RTS Service Map for April 2017 <https://www.myrts.com/Portals/0/Schedules/RTS-System-Map-April-3-2017.pdf> and the link to the portion of the RTS website containing the maps and schedules effective as of September 4, 2017 for RTS fixed routes <https://www.myrts.com/Maps-Schedules/RTS-Monroe/Schedule-pdfs>. This information is provided to give reviewers an understanding of the route structures, time tables, and service area for RTS fixed route.

End of Exhibit 1

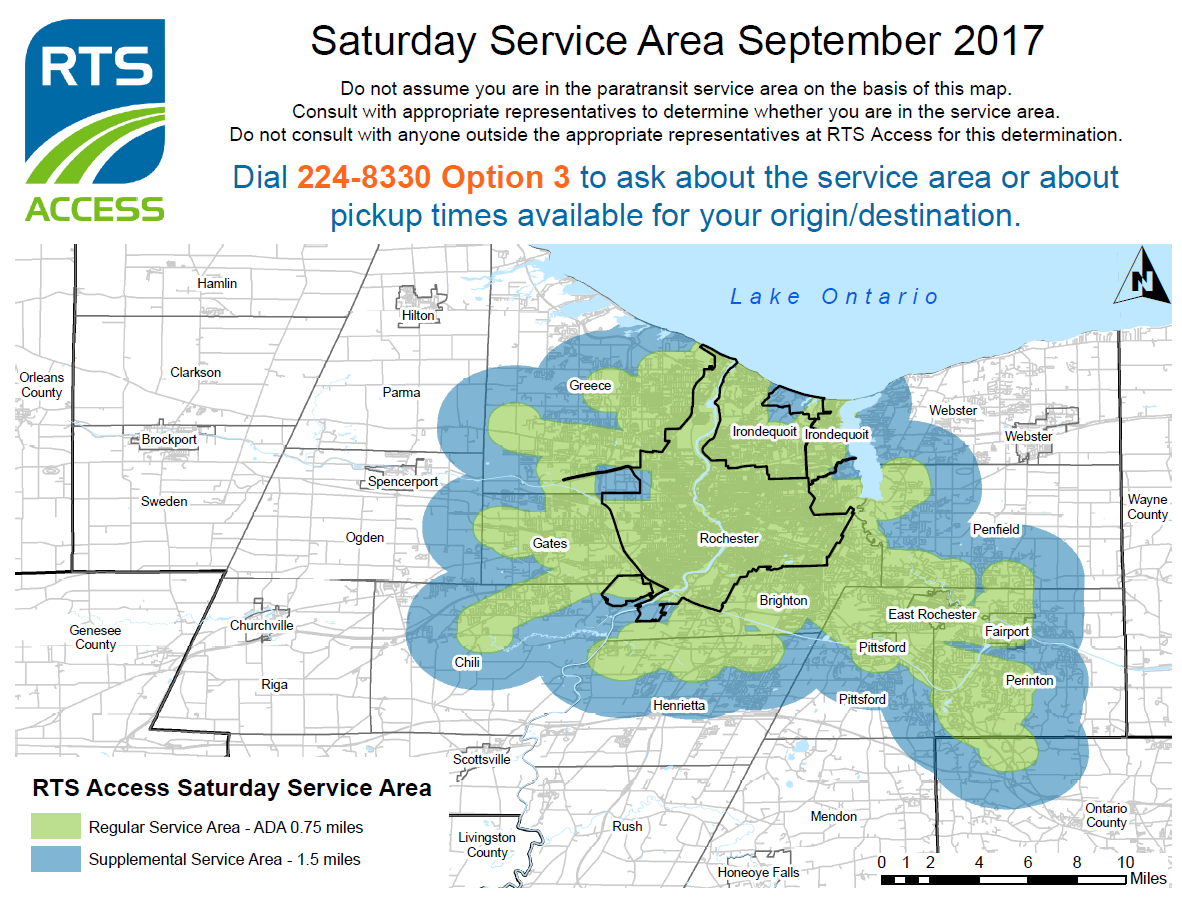
EXHIBIT 2: PARATRANSIT SERVICE AREA MAPS

This exhibit uses text to describe the map representations of the Regular Service Area ADA 0.75 miles and the Supplemental Service Area 1.5 miles. Weekday Service Area. 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. This is shown in the maps as a green area labeled as "Regular Service Area - ADA 0.75 Miles." 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. 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. The maps show supplemental service as a blue area labeled as "Supplemental Service Area - 1.5 Miles."

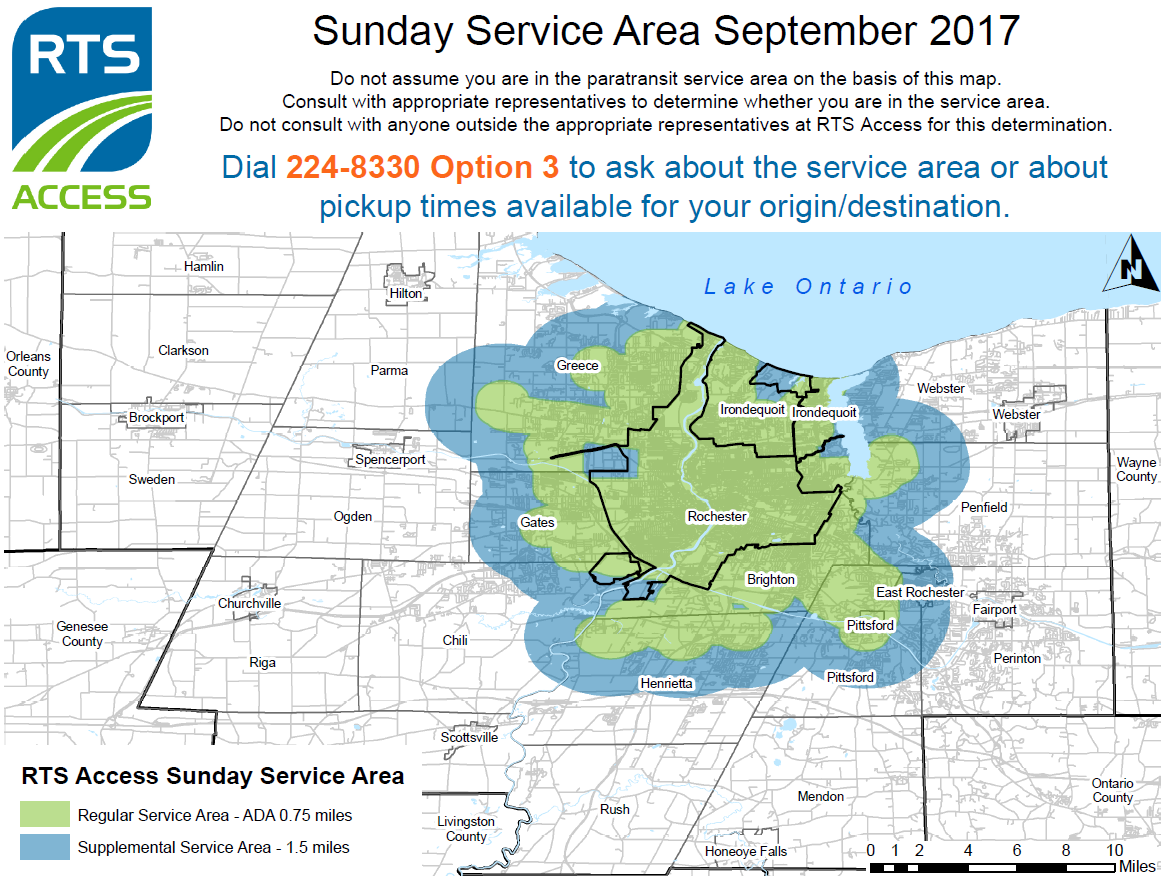
The Weekday Service Area map shows the entire geographic area in which RTS Access provides complementary paratransit service in Monroe County. The weekday paratransit service mirrors the weekday RTS fixed routes.



The Saturday Service Area map shows the geographic area RTS Access serves when providing service comparable to the Saturday RTS fixed routes in Monroe County. This area is smaller than the Weekday Service Area.



The Sunday Service Area map shows the geographic area RTS Access serves when providing service comparable to Sunday RTS fixed routes in Monroe County. This area is smaller than the Saturday Service area.



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 fixed routes have specific schedules with start times for the first stop and end times for the last stop. To provide comparable paratransit service, RTS Access buses run within the same time-ranges as a comparable fixed route serving the same area. RTS Access customers call and schedule their time for pickup, but the pickup times cannot occur outside the time-range corresponding to a fixed route in that area. The RTS Fixed Route Schedules are available online at <https://www.myrts.com/Maps-Schedules/RTS-Monroe/Schedule-pdfs>. RTS Access customers can dial 585-224-8330 Option 3 for details about the available pick-up times. A Note on each of the maps says the following: Do not assume you are in the paratransit service area on the basis of this map. Consult with appropriate representatives to determine whether you are in the service area. Do not consult anyone outside the appropriate representatives at RTS Access for this determination. Dial 224-8330 Option 3 to ask about the service area or about pickup times available for your origin/destination.

End of Exhibit 2

EXHIBIT 3: SUBSCRIPTION SERVICE

# Paratransit Trip Subscriptions Procedure

## About RTS Access Trip Subscriptions

Based on available capacity RTS Access will offer trip subscriptions to paratransit eligible customers meeting the conditions described in this document. “Subscriptions” will allow customers to make a one-time phone call to set up 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 compliance with ADA regulations, 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. RTS Access will reserve the right to cancel an individual trip or the entire Subscription if we experience capacity constraints. In that case, we will 1) inform the customer in advance of a scheduled trip that we are cancelling the Subscription; and 2) instruct the customer to schedule trips separately. If RTS Access suspends a customer from using RTS Access in accordance with our Paratransit No-Shows and Service Suspensions process, we will cancel that customer’s Subscription service. When possible, RTS Access will try to provide the cancellation notice 1 week in advance of the scheduled trip, but does not guarantee advance notice of 1 week. It is important for customers to meet our conditions and use the Subscription trips responsibly. If a customer engages in disqualifying conduct, we will cancel his or her trip Subscription. The purpose of this material is to offer guidance about the following topics: 1) the qualifications for trip Subscriptions; 2) the restrictions on trip Subscriptions; 3) the disqualifications that prompt us to cancel Subscriptions; and 4) our process for managing Subscriptions.

## 1.0. Required Conditions to Qualify for a Subscription

We will offer Subscriptions to customers who meet the following conditions:

1. A pattern of frequent identical travel; and

2. A pattern of reliable travel; and

3. A paratransit eligibility certification of either Unconditional or Conditional and current (unexpired).

We will rely on the travel data in our paratransit scheduling system (Trapeze PASS).

## 1.1. Frequent Identical Travel

The customer must take trips with the same origin and destination, same pick-up or drop-off time on the same day(s) of the week. These are identical trips. The travel data must show that the customer takes 2 or more identical trips per week for a minimum of 3 consecutive months in the current year.

## 1.2. Reliability

Reliability means all of the following:

1. No cancellations of any kind (advance or late) in 6 consecutive months or more.

2. No “Single No-Shows” in 6 consecutive months or more. Single No-Shows are explained in the Paratransit No-Shows and Service Suspensions procedure.

3. No “Service Suspensions” in 6 consecutive months or more. Service Suspensions are explained in the Paratransit No-Shows and Service Suspensions procedure.

## 1.3. Unconditional or Conditional Eligibility

Conditional certifications must be current to be valid. Expired certifications are excluded. If a customer has a trip Subscription but allows the Conditional eligibility certification to expire, we will revoke the trip Subscription privilege on the date of expiration. Customers with extensions will still have the ability to use paratransit service without the Subscription (customers must schedule each trip).

## 2.0. Allowances

We will allow customers to put Subscriptions on hold for up to 3 months. When a Subscription is on hold, the customer can stop using the Subscription temporarily without penalty. The customer must notify the Subscription Coordinator of the start date and stop date for the hold. If the customer does not resume Subscription use after the specified date, the customer will lose the Subscription privilege.

# 3.0. Restrictions

Paratransit is a shared ride service and must reasonably satisfy non-subscription demand. The distribution of service is affected by operational costs, performance standards, customer demand, scheduling logistics, and physical capacity. The following restrictions will apply to Subscriptions in an effort 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 outside the service area and will not run on major holidays.

3. Subscriptions will not be available for unique trips, for short-term situations, or during hours or days with peak demand.

4. Subscriptions will not be available to customers with Seasonal or Temporary eligibility certifications.

Sections 3.1 through 3.5 will explain each restriction in more detail.

# 3.1. 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 a.m. and 9:00 a.m. on Mondays, then the maximum percentage available for Subscription trips is 50% (or 25 trips).

If our capacity for non-subscription 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 and will not affect the eligibility determination process for general paratransit. We will reduce or exclude Subscriptions from days or times with high non-subscription ridership demand.

High demand for Subscription trips is defined as exceeding 50% of the RTS Access system capacity, unless there is non-subscription capacity. 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.

# 3.2. Service Area

Subscription service will be available within the core ADA service area only.

# 3.3. 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).

# 3.4. Unique Trips

Subscription service will only apply to identical trips that repeat 2 or more times per week. 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 that vary from week to week (a different destination, a different pick-up, different times, or different days of the week) must be scheduled each time and will not be included in a Subscription. Subscription and non-subscription customers alike must call and reserve each unique trip.

# 3.5. Eligibility Certification

Subscriptions are not issued to customers with Temporary, Seasonal, or expired Conditional eligibility certifications. Subscription service will be available only to customers with Unconditional or current Conditional paratransit eligibility certifications. If a customer’s certification expires and is not renewed we will cancel his/her Subscription. If the customer’s service is subsequently extended and renewed, he/she will need to requalify for Subscription service. In the interim, the customer will be able to schedule individual trips in accordance with the ADA requirements and the RTS Access process.

# 4.0. Rights Reserved

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’s time within a 20-minute range. When possible, we will notify the customer 1 week prior to putting the change into effect.

# 5.0. Subscription Cancellation

A “Subscription Cancellation” will apply to customers with a Subscription. Any of the following issues will result in cancellation of a person’s existing Subscription service:

1. Service Suspension.

2. A chronic trend of cancelling Subscription trips—as explained in section 6.2.

3. Failure to maintain the required conditions of: a) Identical and frequent travel; b) Usage of Subscription; c) Reliability (see section 1.2 Reliability); and d) Current Eligibility certification.

After we notify the customer that we are cancelling the Subscription, the customer must call to schedule all trips—identical or unique—until we extend another offer for a Subscription. The customer must re-qualify to be added to the waiting list. We will offer the next available Subscriptions to qualified customers based on our capacity and their position on the waiting list.

## 6.0. Disqualifying Conduct

## 6.1. Service Suspension

If a customer is suspended, the suspension will apply to all trips, including Subscription trips. The 2nd time a customer gets a “Repeated No-Show Violation” in the same year we will cancel his/her Subscription and tell the customer the date to begin scheduling every trip. Repeated No-Show Violations are explained in the Paratransit No-Shows and Service Suspensions procedure. If the customer meets the conditions for a new Subscription, we will contact the customer. If we do not have capacity, we will add the customer to a Subscription waiting list.

## 6.2. Repeatedly Cancelling Trips

Each Subscription will have a trip allotment based on the customer’s needs, such as whether the trip is one-way or round trip and frequency each month. For example, one Subscription may have a round trip that occurs 20 times per month, while another Subscription may have a one-way trip that occurs 12 times per month. We will apply a 5% threshold for advance cancellations on Subscription trips. We will run monthly reports to check on the rate of advance cancellation. If a customer cancels 5% of the trip allotment over 3 consecutive months, a pattern of cancellation is developing. We will issue a warning letter telling the customer to increase Subscription trip usage to avoid losing the Subscription. If the cancellation pattern persists without improvement for the next 3 consecutive months, we will notify the customer and cancel the Subscription.

## 6.3. Failure to Maintain Conditions

When a customer accepts an offer of a Subscription and completes the reservation process, the Subscription trips will have an agreed upon time, location, day of the week, and frequency. After the Subscription is active, it will not be modified. The customer will be responsible for complying with his/her trip parameters. If the parameters of the trip change, we will cancel the Subscription. If a customer allows his or her Conditional certification to expire, we will cancel the Subscription. If the customer’s eligibility status changes from Conditional to Temporary or Seasonal, we will cancel the Subscription. When a customer receives a Service Suspension, we will cancel the Subscription.

## 7.0. Expectations

We expect customers to follow the rules outlined in the most current version of our Paratransit No-Shows and Service Suspensions procedure. We expect all customers to follow the rules for Subscriptions:

1. Cancel a trip at least 2 hours before the “Pickup Period” begins (advance cancellation). The Pickup Period is explained in the Paratransit No-Shows and Service Suspensions procedure.

2. Keep advance cancellations to a minimum and less than the 5% threshold.

3. Regularly use allotted Subscription trips.

4. Show up for scheduled trips with the “5-Minute Waiting Period” as explained in the Paratransit No-Shows and Service Suspensions procedure.

We expect that customers with Subscriptions will notify us when they no longer need a Subscription.

## 8.0. Managing Subscriptions

## 8.1. Customers with Subscriptions and Conditional Eligibility Certification

The Subscription Coordinator will issue a letter to the customer 60 days before the customer’s Conditional eligibility certification expires. The letter will remind the customer to recertify to maintain the eligibility condition for paratransit and for Subscription service. If the customer does not recertify in 30 days, the Subscription Coordinator will issue a 2nd letter warning the customer that he/she will lose the Subscription and the ability to use RTS Access if the certification expires.

If another month elapses and the certification expires, the Subscription Coordinator will cancel the Subscription. RTS Access will notify the customer that he/she cannot use RTS Access paratransit service until he/she has re-established eligibility.

## A. Extensions

If the customer calls the ADA Certification Coordinator and requests an extension of time to obtain approval of their conditional eligibility certification, the extension will apply to standard paratransit service only. An extension will not apply to Subscriptions. As soon as the customer’s certification lapses, we will cancel the Subscription.

## 8.2. Tracking Qualified Customers

The Subscription Coordinator will use the data from the paratransit scheduling system (Trapeze PASS), the paratransit eligibility system (PES), and the Customer Relationship Management system (Salesforce) to confirm whether customers meet the conditions for Subscription service. As long as capacity exists, we will add customers who meet the conditions for Subscription service to the trip. If there is insufficient capacity, we will add customers to the waiting list.

## 8.3. Offering Subscriptions

If RTS Access has capacity to offer a Subscription, the Subscription Coordinator will select the next customer who requires a trip in the available day/time slot from the waiting list. The Subscription Coordinator will issue a letter informing the customer that he/she will be added to the Subscription. The letter will outline the required conditions, restrictions, and actions that will result in losing the Subscription.

## 8.4. Revoking Subscriptions

If a customer incurs a Service Suspension, the Subscription Coordinator will issue a letter notifying the customer that his/her Subscription service will be cancelled. The letter will include the date the cancellation is effective.

End of Exhibit 3

EXHIBIT 4: PUBLIC PARTICIPATION & NOTIFICATION

The exhibit contains the Public Participation Plan, June 2017-2020 and the Notifications Regarding Changes to the RTS Access Service Area.

# RGRTA Public Participation Plan, June 2017-2020 Version 2 Effective 05/17/2017

## 1.0 Purpose

This plan documents the public involvement process and procedures of the Rochester Genesee Regional Transportation Authority (RGRTA). 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 RGRTA website at www.myRTS.com.

## 2.0 RGRTA’s Current Business Profile

RGRTA 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 Sizes: 421 Total, RTS (219), RTS Access (53), RTS Ontario (42), RTS Seneca (10), RTS Genesee (12), RTS Livingston (22), RTS Orleans (7), RTS Wayne (42), RTS Wyoming (14)

## 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, RGRTA 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 (ADA)

The Americans with Disabilities Act (ADA) of 1990 encourages the involvement of people with disabilities in the development and improvement of transportation and paratransit services. In accordance with ADA guidelines, all meetings conducted by RGRTA 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 such services or devices as qualified interpreters, assistive listening headsets, television captioning, and decoders, telecommunication devices for deaf persons (TDDs), videotext displays, readers taped text, brailed materials, and larger print materials. RGRTA public meeting notices specify that special accommodations will be provided upon request.

## 5.0 Public Participation

The vision of RGRTA 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 RGRTA 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

RGRTA 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

RGRTA provides transparency into the organization through the posting of minutes and other governance related documents on its website ([www.myRTS.com](http://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 RGRTA, 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 RGRTA website. 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 RGRTA 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 RGRTA, 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 RGRTA 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.

RGRTA often provides slides and image boards to illustrate topics of discussion. Participants are encouraged to ask questions of RGRTA 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. RGRTA 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 RGRTA website, 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 RGRTA 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.

### 2. 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 RGRTA 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.

### 3. PUBLIC NOTIFICATION OF FINAL RECOMMENDATIONS

If a recommended route adjustment does not require a public hearing, final recommendations are posted on RGRTA’s website 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 RGRTA website, 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. RGRTA 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 RGRTA Board of Commissioners before a decision is made on the proposal.

RGRTA will provide a report of all public comments received, RGRTA’s 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. 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. RGRTA will track the customer feedback received during the open houses in our 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. RGRTA 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 RGRTA 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, RGRTA is comprised of seven regional transportation subsidiaries. They are RTS Genesee, RTS Livingston, RTS Ontario, RTS Orleans, RTS Seneca, RTS Wayne, and RTS Wyoming. RGRTA 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

RGRTA 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.

RGRTA 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

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

a. Hold multiple public information meetings in affected communities;

b. Hold stakeholder group meetings; and

c. Present changes to elected government officials.

RGRTA 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

RGRTA 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 RGRTA Board of Commissioners upon an initial round of public discussion.

### 6.3. Public Hearing

Anytime RGRTA conducts a public hearing, the RGRTA Board of Commissioners will authorize formal solicitation of public commentary. RGRTA 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.

RGRTA 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. RGRTA will provide a report of all public comments received, RGRTA’s 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

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

### 8.6. Braille

RGRTA 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 [www.myRTS.com](http://www.myRTS.com) font size can be enlarged 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 4

# NOTIFICATIONS REGARDING CHANGES TO THE RTS ACCESS SERVICE AREA procedure proposed for 2017-18 Paratransit Plan.

## 1.0. 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: changes the number of service hours operated on a route by 25% or more; or 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.

## 2.0. Reductions to RTS Access Service Area

If an RTS fixed route service change reduces the service area for RTS Access complementary ADA 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 IVR 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 Notifications Regarding Changes to the RTS Service Area procedure in Exhibit 4

End of Exhibit 4

EXHIBIT 5: NO-SHOWS (MISSED RIDES)

Exhibit 5 contains the procedure for Paratransit No-Shows and Service Suspensions, the procedure for Paratransit Service Suspensions for Prohibited Conduct, and the Notice of Intent to Appeal Suspension.

Paratransit No-Shows and Service Suspensions procedure proposed for 2017-18 Paratransit Plan.

# 1.0. Overview

RTS Access expects customers to use their trips. If a customer fails to use booked trips repeatedly, the customer will get a service suspension. A “Service Suspension” is a temporary period when the customer cannot use RTS Access service. After booking a trip, the customer gets a pickup period. A “Pickup Period” is the 20-minute window of time RTS Access assigns to a customer and during which the bus is scheduled to arrive to pick up the customer for the trip. After the Pickup Period begins, the Bus Operator will wait 5 minutes for the customer 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 the customer 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.

A “Single No-Show” occurs when the customer fails to show up during the 5-Minute Waiting Period for pickup by RTS Access. A customer must cancel an unwanted trip 2 hours before pickup. A “Late Cancellation” occurs when the customer cancels a trip less than 2 hours before the Pickup Period begins. For the purposes of this service suspension process, a Late Cancellation is also considered a Single No-Show. If the customer commits a Single No-Show 3 times in one month, we will check whether the customer breaks our rule for using booked trips. We will look at the number of trips for the month and the number of Single No-Shows. A “Repeated No-Show Violation” occurs when a customer accumulates 3 or more No-Shows equal to 5% of the trips scheduled in 1 month. The accumulation of Repeated No-Show Violations serves as the basis for Service Suspension.

# 2.0. Service Suspensions

We will add up the number of times a customer has a Repeated No-Show Violation in 1 year, starting on January 1 and ending on December 31. After the 2nd time, we will give the customer a Service Suspension. The number of days that the customer is suspended will increase until the 5th time. The first time the customer has a repeated No-Show Violation in 1 year will result in a penalty of a Warning Letter.

The second time the customer has a repeated No-Show Violation in 1 year will result in a penalty of a 5 Day Service Suspension and cancellation of any trip subscriptions.

The third time the customer has a repeated No-Show Violation in 1 year will result in a penalty of a 10 Day Service Suspension.

The fourth time the customer has a repeated No-Show Violation in 1 year will result in a penalty of a 15 Day Service Suspension.

The fifth time the customer has a repeated No-Show Violation in 1 year will result in a penalty of a 20 Day Service Suspension. Each additional time thereafter that the customer has a repeated No-Show Violation in 1 year will result in a penalty of a 20 Day Service Suspension.

# 3.0. Notifying Customers About Single No-Shows

When customers do not show up for a trip (Single No-Show), they will receive an automated phone message informing them of the missed trip. The customer will also get a postcard about the missed trip(s). Customers can call RTS Access to discuss the missed trip and correct errors, confirm information, or explain how the trip was missed due to reasons beyond their control.

# 4.0. Reminding Customers About the Rules

We will send postcards to remind customers about the rules for trips and Single No-Shows as necessary. The first time the customer gets a Repeated No-Show Violation, we send will send a Warning Letter to the customer. The letter will explain the rules and explain that we will give the customer a Service Suspension for the next Repeated No-Show Violation. The letter will give a phone number (585-654-0647) that customers can call if they have questions or need guidance on how to use the service.

# 5.0. Suspending Customers

We will send a Notice of Suspension letter the 2nd time a customer gets a Repeated No-Show Violation for the year. The letter will list the Single No-Shows and Repeated No-Show Violations 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. The letter will be mailed the same day through USPS. We will include a copy of our rules and procedures (“Paratransit No-Shows and Service Suspensions”), the form for appealing a service suspension (“Notice of Intention to Appeal Service Suspensions”) and the process for appeals “Paratransit Appeals Process and Procedures”).

# 6.0. Appealing Service Suspensions

If the customer files an appeal before the suspension start date, we postpone the suspension during the appeal process. We must receive the completed “Notice of Intention to Appeal Service Suspensions” form no later than 14 days from the date in body of the “Notice of Suspension” letter. 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.

# 8.0. Supporting Details

Method for Calculating Repeated No-Show Violations: Every customer starts the calendar year on January 1 with zero Repeated No-Show Violations. Every customer starts the 1st day of a month with zero No-Shows. At the end of each month, we will follow these steps to calculate Single No-Shows and any Repeated No-Show Violations for each customer:

1. Add the Single No-Shows and the Late Cancellations for the month. The calculation is Single No Shows + Late Cancellations = No Shows in 1 Month.

2. Compare the No Shows to 3.

a. If the total is greater than or equal to 3, calculate the percentage of missed trips. The calculation is No Shows in 1 Month = 3 = Calculate % Missed Trips

b. If the total is less than 3, the trip use is acceptable. The calculation is No Shows in 1 Month < 3 = Acceptable Trip Use.

3. Divide the No-Shows by the total Trips in the month.

4. Multiply the total by 100 to calculate the percentage of Missed Trips. The percentage goes to the second decimal place; we will not round the value up or down. The calculation is No Shows in 1 Month = Trips in 1 Month x 100 = % Missed Trips

5. Compare the percentage of Missed Trips to 5%.

a. If the Missed Trips are greater than or equal to 5%, the customer will get a Repeated No Show Violation. The calculation is % Missed Trips = 5% = Repeated No Show Violation.

b. If the Missed Trips are less than 5%, the customer’s trip use is acceptable. The calculation is % Missed Trips < 5% = Acceptable Trip Use.

We will track Repeated No-Show Violations through the entire calendar year until December 31.

The example describes a pattern of Repeated No-Show Violations and the resulting penalty.

Example:

Month of January, 70 Trips, 3 Single No-Shows, 4.30% Missed Trips = No Violation and No Penalty.

Month of February, 40 Trips, 3 Single No-Shows, 7.50% Missed Trips = First Repeated No-Show Violation and a Penalty of a Warning Letter.

Month of March, 30 Trips, 1 Single No-Show, 3.30% Missed Trips = No Violation and No Penalty.

Month of April, 37 Trips, 0 Single No-Shows, 0 Missed Trips = No Violation and No Penalty.

Month of May, 64 Trips, 4 Single No-Shows, 6.25% Missed Trips = Second Repeated No-Show Violation and a Penalty of a 5-day Service Suspension and Cancellation of Trip Subscription.

Month of June, 100 Trips, 4 Single No-Shows, 4.00% Missed Trips = No Violations and No Penalty.

Month of July, 88 Trips, 3 Single No-Shows, 3.40% Missed Trips = No Violations and No Penalty.

Month of August, 88 Trips, 3 Single No-Shows, 3.40% Missed Trips = No Violations and No Penalty.

Month of September, 58 Trips, 3 Single No-Shows, 5.76% Missed Trips = Third Repeated No-Show Violation and a Penalty of a 10-day Service Suspension.

Month of October, 72 Trips, 3 Single No-Shows, 4.20% Missed Trips = No Violations and No Penalty.

Month of November, 43 Trips, 0 Single No-Shows, 0 Missed Trips = No Violations and No Penalty.

Month of December, 47 Trips, 0 Single No-Shows, 0 Missed Trips = No Violations and No Penalty.

Missed Trip for Reasons Outside the Customer’s Control: We 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.

Round Trips: A round trip has 2 scheduled trips — an outgoing trip and a return trip. If the customer fails to appear for each trip or cancels both trips on short notice, the customer will get 2 No-Shows.

Cancelled Trip Subscriptions: A “Trip Subscription” assigns the customer to recurring trips (same location at the same time and day). Based on capacity, we will offer subscriptions to customers who take identical trips frequently, have zero Service Suspensions for 6 months, and have a current Conditional or Unconditional certification. The 2nd time a customer gets a Repeated No-Show Violation in the same year, we will cancel his/her trip subscription and tell the customer the date to begin scheduling every trip. If the customer meets the conditions for a new subscription, we will contact the customer. If we do not have capacity, we will add the customer to a subscription waiting list.

End of Paratransit No-Shows and Service Suspensions procedure in Exhibit 5.

# Paratransit Service Suspensions for Prohibited Conduct procedure proposed for 2017-18 Paratransit Plan.

## 1.0. Rules of Conduct

Rochester-Genesee Regional Transit Authority (“RGRTA”) transit vehicles, facilities and properties are intended to provide public transportation services for the benefit of RGRTA and its subsidiaries, its employees and the public. RGRTA, 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 RGRTA’s Rules of Conduct for Transit Vehicles, Facilities, and Properties (“Rules”). These Rules are intended to regulate conduct occurring on RGRTA transit vehicles, within or upon RGRTA facilities and properties, including the RTS Transit Center, and in connection with RGRTA’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 (ADA) 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 RGRTA 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 RGRTA 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 RGRTA transit vehicles, facilities, and properties; or at any person therein; or within RGRTA transit vehicles, facilities, and properties; or out of any door or window of any RGRTA 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 RGRTA 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 RGRTA transit vehicles, facilities, and properties when lacking the ability—because of illness, intoxication, or medication(s)—to care for oneself.

19. Engaging in any harassment, defined as acts occurring within or about RGRTA 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 ADA 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

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 procedure in Exhibit 5.

# Notice of Intent to Appeal Suspension form proposed for 2017-18 Paratransit Plan.

Customer Name:

Client ID#:

I intend to appeal the suspension [ ] In Writing [ ] In Person

If appealing in writing, please provide information specifically stating why the violations charged are in error. Please include any documentation to support the statements.

If appealing in person RTS will call to arrange for a hearing, at a mutually agreed upon date, no later than 21 days from the date the notice of suspension was issued. RTS Access will advise you in writing of its decision concerning your appeal within 7 days of the hearing. The decision of the Appeals Committee is final.

Please mail this completed form to:

RTS Paratransit Services

Appeals Coordinator

1372 East Main Street

Rochester, NY 14609

End of Notice of Intent to Appeal Suspension form

End of Exhibit 5

EXHIBIT 6: COMPLAINTS

The exhibit contains the content of the Reasonable Modification Complaint form and the ADA Complaint form.

# Content of the 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):

Electronic Mail Address:

RTS Service Provider: [checkboxes] RTS Monroe, RTS Access, RTS Genesee, RTS Livingston, RTS Ontario, RTS Orleans, RTS Seneca, RTS Wayne, RTS Wyoming

Accessible Format Requirements? [checkboxes] Large Print, TDD, Audio Tape, Other

## Section 2

Are you filing this complaint on your own behalf? Yes or 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 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 or 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:

Date:

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

RGRTA Legal Affairs Department

1372 East Main Street

Rochester NY 14609

End of Reasonable Modification Complaint Form

# Content of ADA 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):

Electronic Mail Address:

Accessible Format Requirements? [checkboxes] Large Print, TDD, Audio Tape, Other

## Section 2

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

## Section 3

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

Time of alleged discrimination based on disability:

Transit Service (choose one): [checkboxes] RTS, RTS Access, RTS Geneseo, RTS Livingston, RTS Ontario, RTS Orleans, RTS Wayne, RTS Wyoming

Bus #:

Route Name/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 person(s) who discriminated against you (if known); and 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 or No.

If you answer Yes, check all that apply: [checkboxes] Federal Court, State Agency, State Court, Local Agency

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

Name:

Title:

Agency:

Address:

Telephone:

Signature:

Date:

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

RGRTA Legal Affairs Department

1372 East Main Street

Rochester NY 14609

End of ADA Complaint Form

End of Exhibit 6

EXHIBIT 7: TIMELY SERVICE

This exhibit contains the procedures for Measuring Service Quality for TOPS and the OTP Procedure for RTS Access.

# Measuring Service Quality for TOPS, Version 7, Effective April 1, 2016

This document explains the measurement procedure for the On Time Performance metric in the Service Performance Index of the Quality Service Delivery strategic pillar.

## 1.0. Transit Organization Performance Scorecard

RGRTA uses strategic pillars to identify areas essential to success. RGRTA uses the Transit Organization Performance Scorecard (TOPS) as a tool to measure and monitor performance in the strategic pillars. Each pillar has a correlating performance index, or category, in the scorecard. Each index contains one to three distinct performance indicators, or metrics. At regular intervals the metrics are measured, delivered, and communicated.

The Financial Performance Index (FPI) assesses RGRTA's Financial Sustainability Pillar and has a goal of 40.0 points in all four quarters. The Customer Satisfaction Index (CSI) assesses RGRTA's Customer Service Excellence Pillar and has a goal of 30.0 in the first and third quarters and 25.0 points in the second and fourth quarters. The Service Performance Index (SPI) assesses RGRTA's Quality Service Delivery and has a goal of 30.0 points in the first and third quarters and 25.0 points in the second and fourth quarters. The Employee Engagement Index (EEI) assesses RGRTA's Employee Engagement pillar and has a goal of 0.0 points in the first and third quarters and 10.0 points in the second and fourth quarters.

### 1.1. Quality Service Delivery

The Quality Service Delivery pillar uses the Service Performance Index (SPI). SPI uses one success indicator, on-time performance, for all operations units. The SPI points are allocated between RTS Monroe and RTS Access based on their respective percentage of the total customers served by the Authority, with the balance of points allocated evenly amongst the Regionals. As a result, 93% of the SPI points are allocated to RTS Monroe, 1% to RTS Access, and 6% to the seven regional subsidiary companies combined. SPI is worth a total of 25 points for two quarters and a total of 30 points for two quarters. Because the Employee Engagement Index will be measured in Q2 and Q4 only, EEI points were redistributed to SPI and CSI for Q1 and Q3.

The ScoreCard Points for SPI are 30 points in Q1 April to June, 25 points in Q2 July to September, 30 points in Q3 October to December, and 25 points in Q4 January to March. The SPI business impact is that customers consistently indicate that on-time performance is the most important element of RTS bus service.

The purpose of SPI is to measure how successful we are at picking up customers at the scheduled time. The SPI is measured monthly. The success indicator for the SPI is on-time performance (OTP).

The Operations Units measured in the SPI are Monroe, Access, Genesee, Livingston, Ontario, Orleans, Seneca, Wayne, and Wyoming.

The service to measure in the SPI is as follows: RTS Monroe measures OTP for fixed route service. RTS Access is the paratransit service provider for Monroe County and measures demand response service for OTP. Regional companies measure OTP on a set of routes with published schedules wherein route deviation may occur. While Regionals may offer flex route or dial-a-ride service, those services are not used to measure OTP.

## 2.0. Goal Setting

Goals and points are determined annually and approved by the start of each fiscal year (April). The historical performance for each operations unit factor into the goals they are assigned. Goals are approved by the CEO and presented to the Board of Commissioners at the March Board Meeting prior to the start of the new fiscal year.

## 3.0. On-Time Performance Standards

### 3.1. Definitions

Fixed Route: service only operates according to pre-defined, published routes and schedules. RTS Monroe provides fixed route service.

On Time: bus arrives or departs at a time point within the applicable performance window for its scheduled time or at the schedule time; also called Normal.

On-Time Performance (OTP): is the percentage of service that is running on time within the allowable window.

Paratransit: transit for eligible persons in accordance with the Americans with Disabilities Act where service is provided at the customer’s request, and is based on a defined service area and scheduled pickups rather than on fixed routes. RTS Access provides paratransit service in Monroe County.

Route Deviation: a form of demand response service which operates on a base set of routes with published schedules, but may deviate up to 3/4 of a mile from the base route. The Operator must return to the point of deviation and then continue on the base route according to the published schedule. All regional companies conduct some portion of the demand response service with route deviation.

Valid Time Point: is the exact location and arrival time for the bus.

Window: the bus is on time if it arrives or departs at a valid time point within a pre-established number of minutes before or after its scheduled time.

### 3.2. Performance Windows

Each scheduled time point for a route has a range of minutes, or “window.” When the bus arrives or departs within the window for the scheduled time point, it is On Time.

Fixed Route service from RTS Monroe has a window of 2:00 minutes Early to 5:00 minutes Late. Paratransit service from RTS Access has a window of 10 minutes Late. Route Deviation service from RTS Regionals has a window of 5 minutes Early to 5 minutes Late and this applies to base route locations only.

### 3.3. Measurement Criteria for Fixed Route and Route Deviation

Published schedules identify the scheduled times and stop locations to customers. Any operations unit with a published schedule must compare the time they actually arrive at an official route stop location with the fixed time in their published schedule. All operations units must measure actual arrival time for every stop location listed in their published schedules.

### 3.4. Measurement Criteria for Route Deviation

For companies with route deviation, only the time points (stop locations with a published time) on the base routes are measured for OTP. Regional companies compare the time they actually arrive at the stop location on the base route with the time in their published schedule.

### 3.5. Measurement Criteria for Paratransit

Customers call and schedule a pickup time and location in advance. RTS Access Paratransit operations must compare the time they actually arrive at the arranged location with the scheduled pickup time.

### 3.6. Repository for Results

After measurements are collected and calculated, the results for each company must be entered into designated spreadsheets on the RTS Shared network drive (S drive). The Director of Analytics consolidates the results in the TOPS subfolders for the current fiscal year in the Analytics network drive.

## 4.0 Activities

1. Perform measurement or designate employee(s) to perform measurement and report results. (Regional Managers, Director of RTS Bus Operations, VP of Operational Initiatives)

2. Input value into TOPS Monthly Data spreadsheets on the Shared network drive. (Regional Managers, Director of RTS Bus Operations, VP of Operational Initiatives)

3. Input values into TOPS workbooks and score sheets on the Analytics drive. (Director of Analytics)

4. Verify that the monthly values are within established control limits. (Director of Analytics)

5. Review and discuss final numbers and issues if necessary. (Leadership, CEO)

6. Provide requested summary data to CEO. (Director of Analytics)

### 4.1 General Schedule

1. On the second Friday of the month: Managers, Directors, and VPs measure the SPI metrics and input the values into their spreadsheets on the Shared network drive. The Director of Analytics consolidates the information into the TOPS workbook on the Analytics drive.

2. On the first Thursday of the month: The Board of Commissioners holds a meeting.

3. In the months of August, November, February, and May: The Board reviews quarterly TOPS results during the Board Meeting.

## 5.0. Tools and Inputs

### 5.1. About CAD/AVL Technology

RTS Monroe and RTS Access use a computer aided dispatch and automatic vehicle location (CAD/AVL) system called OrbCAD. When OrbCAD is functioning normally, radio communications and GPS equipment broadcast the real-time locations of buses in service. An OrbCAD database (LTDB) captures the timestamp and location data.

### 5.2 RTS Monroe

RTS Monroe uses the following tools:

1. OrbCAD system, Radio Communication System and OrbCAD Long-term Database

2. Operations Report Database

3. RADIAN

4. OpsDailyWorksheetv6.xlsm

5. Route Ranking Summary Vx (deployed from Crystal Reports)

6. RSA by Route Vx – Daily (deployed from Crystal Reports)

7. Measurement of daily RSA.xlsx

8. Trapeze FX schedules

9. Trapeze OPS work assignments

10. Trapeze PASS application and reports

RTS Monroe uses the following inputs:

1. GPS timestamps/time points

2. Work Schedules

### 5.3 RTS Access

RTS Access uses the following tools:

1. OrbCAD system, Radio Communication System and OrbCAD Long-term Database

2. Trapeze PASS application and reports

3. Scheduled pickups

4. Paper manifests

RTS Access uses the following inputs:

1. GPS timestamps/time points

2. Work Schedules

3. Operators

### 5.4 RTS Livingston

RTS Livingston uses the following tools:

1. OrbCAD system and OrbCAD Long-term Database

2. Operations Report Database

3. RADIAN

4. LATS RSA by Route Vx (deployed from Crystal Reports)

5. Paper manifests

6. Published Schedules

RTS Livingston uses the following inputs:

1. GPS timestamps/time points

2. Work Schedules

3. Operators

### 5.5 RTS Ontario

RTS Ontario uses the following tools:

1. Route Match system

2. Scheduled pickups

3. RADIAN

4. On Time Performance – CATS (deployed from Route Match, Fixed Route Reporting)

5. Paper manifests

6. Published Schedules

RTS Ontario uses the following inputs:

1. GPS timestamps/time points

2. Work Schedules

3. Operators

### 5.6 RTS Genesee, Orleans, Seneca, Wayne, and Wyoming

RTS Regionals use the following tools:

1. Published schedules

2. OTP.xlsx

3. Paper manifests

RTS Regionals use the following inputs:

1. Regional Managers

2. Managers of Operations

3. Work Schedules

4. Operators

## 6.0. Auditing and Conformity

Employees with roles associated with Quality and Performance Measurement may audit the collection and calculation procedures during periodic review. Such audits may occur randomly or when results vary by more than two standard deviations. For Regional operations units, the audits involve review of the paper manifests and a check of mathematical accuracy. For operations units using CAD/AVL technology, the audits involve review of the onboard technology and supporting databases. Regional operations units must collect time points manually; therefore, data spot checks are conducted to verify compliance with the OTP standards and best practices are provided for measuring OTP.

### 6.1. Best Practices for Regional Operations Units

1. Operators must log their actual arrival time at each stop/time listed in the published schedule, whether or not they pick up a customer.

2. Managers must ensure the fields on the paper manifests match the published schedule locations.

3. Managers must always calculate the same total time points for a route; the total time points are derived from the published stop locations for that route.

4. Managers may not estimate OTP for fields that are not filled in by the Operator with an actual arrival time.

5. When Operator’s runs go to “the end of the line,” they must log their actual arrival time AND their actual departure time.

6. Managers may only use actual arrival times when categorizing and calculating OTP.

### 6.2. Spot Checks

The Director of Analytics and staff may routinely conduct spot checks of OTP data.

## 7.0. Collection and Calculation Procedures for Operations Units

Specific procedures for the operations units are on the intraweb.

End of Measuring Service Quality for TOPS procedure in Exhibit 7.

# OTP Procedure for RTS Access, Version 4, Effective April 01, 2016

This document explains the collection and calculation procedures for the On Time Performance metric at RTS Access. These measurements support the Service Performance Index of the Quality Service Delivery strategic pillar.

## 1.0. Criteria

Service to Measure: Paratransit Service is provided at an eligible customer’s request, and is based on a defined service area and scheduled pickups rather than on fixed routes. RTS Access provides paratransit service in Monroe County.

Total Sample: Monday through Sunday.

Route Randomization: Full population of all service.

Arrival Times: Arrival times are used for OTP calculations. Customers call and schedule a pickup time and location in advance. RTS Access operations must compare the time they actually arrive at the arranged location with the scheduled pickup time for each customer.

## 2.0. Goals and Scorecard Points for Fiscal Year 2016-2017

In the scorecard, Service Quality will be worth 30 of 100 points in Quarters 1 & 3, and 25 of 100 points in Quarters 2 & 4. The quarterly score includes all operations units. Below are the goals and ranges assigned to RTS Access.

Access Quarter 1 and Quarter 3: 95.0%, 0.33 points, % Range: 90% minimum to 100% maximum, Point Range: 0.229 minimum to 0.425 maximum. Access Quarter 2 and Quarter 4: 95.0%, 0.27 points, % Range: 90% minimum to 100% maximum, Point Range: 0.191 minimum to 0.354 maximum.

## 3.0. Collecting and Calculating Time Points

RTS Access buses and Dispatch have the OrbCAD and radio systems. OrbCAD collects and records time point data throughout the run; the data is sent to Trapeze PASS. Operators also record time point data manually using paper manifests; the paper manifests serve as a backup source of data. In cases where backup data is needed, the Dispatcher inputs the data from paper manifests into the Trapeze PASS system. All time-point data, whether collected automatically from OrbCAD or manually from paper manifests, resides in Trapeze PASS.

The Administrative Assistant uses Trapeze PASS to generate the report that calculates on-time performance.

### 3.1. Process

A. Dispatchers

1. Distribute Operator manifest sheets to each Operator at the beginning of work.

2. Log on with OrbCAD.

3. Collect completed paper manifests.

4. If failures are noted on the manifests or if Trapeze is missing auto arrival data, input the time points from the paper manifests into Trapeze PASS.

B. Operators

1. Log on with OrbCAD and complete route.

2. Use Operator manifest sheets as a backup method for recording the pickup times. If OrbCAD or the radios fail, make a note on the manifest.

The Operator records the actual pickup time in the pickup time column, in the space above the official scheduled pickup time. The Operator indicates if OrbCAD malfunctions in the notes area.

C. Administrative Assistant

1. On the first day of the month, run the On-Time Compliance Report in Trapeze PASS. The date range is for the month prior.

2. Save a copy of the On-Time Compliance Report to 01\_Access\_OTP in the Reports folder for the year. Name the PDF file by month.

3. Email the On-Time Compliance Report to the Director of Analytics.

If the Administrative Assistant is unavailable, the VP of Operational Initiatives or another designee performs the process.

### 3.2. Trapeze PASS (On-Time Compliance Report)

1. Launch Trapeze Reports.

2. Select Productivity Reports > On Time Compliance.

3. Click Process & Run Report.

4. Select the On Time Compliance parameters specified here and click OK.

a. From Date/To Date: select the start and end dates for the month.

b. Type: select 1 Live

c. From Route/To Route: select all routes

d. Report Type: Summary

e. Group By: Route

f. Pickup Time Base: Sched. Time, Early/Late: -10/+10

g. Will-Call Time Base: Sched. Time, Early/Late: -10/+10

h. Exclude Exception Day: Select

i. Providers: All

j. Ada Codes: All

k. Funding Sources: All

5. Trapeze provides the On Time Performance Report.

6. Email the value of the Grand Total for column Scheduled Trips LateOnly % On-Time to the Director of Analytics.

### 3.3. Formula

Each scheduled time point for paratransit has a window of 10 minutes Late. Although all time points are tracked, only Late time points are used to calculate on-time performance. A Late time point is considered Abnormal. A time point that is on time is considered Normal.

Late divided by Total Time Points = Fraction of Abnormal Time Points

1 Minus Fraction of Abnormal Time Points Multiplied by 100 = On Time Performance %

To do the calculation:

Divide the total number of Late time points by the total number of time points for the month.

Subtract the fraction from 1 and multiply by 100.

Q1% + Q2% + Q3% + Q4% divided by 4 = Annual %

The quarterly percentages are averaged to calculate the annual percentage.

### 3.4 Destination for Calculated Data

Analytics network drive

End of OTP Procedure for RTS Access in Exhibit 7

End of Exhibit 7

EXHIBIT 8: PICKUP PERIODS FOR RETURN TRIPS AND “NO STRAND” POLICY

This exhibit contains the proposed Paratransit "No Strand" Policy for the Paratransit Plan 2017-18.

# 1.0. Overview

After booking a trip, the customer is given a “Pickup Period,” which is the 20-minute window of time RTS Access assigns to a customer during which the bus is scheduled to arrive to pick up the customer for the trip. After the Pickup Period begins, the Bus Operator will wait 5 minutes for the customer 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 the customer to appear for the scheduled pickup. The 5-Minute 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. A “Single No-Show” occurs when the customer fails to show up during the 5-Minute Waiting Period for pickup by RTS Access. A “Late Cancellation” occurs when the customer cancels a trip less than 2 hours before the Pickup Period begins.

# 2.0. Final Pickup Periods for Return Trips

RTS Access will establish a “Final Pickup Period” based on the comparable schedule for fixed route service. A Final Pickup Period is the latest-available, return-trip pickup period that takes into account the likely travel time for the requested trips and allows the RTS Access Bus Operator to finish transporting customers to their destinations no later than the latest comparable fixed route drop-off.

RTS Access Schedulers will schedule trips in compliance with the established Final Pickup Period. 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. In this example, the Scheduler could not reserve a comparable paratransit trip with a pickup period after 9:50 PM.

RTS Access will not provide return trips after the Final Pickup Period.

# 3.0. No Strand Policy

RTS Access customers can schedule rides that are one-way or round-trip. A round-trip ride has two scheduled trips — an outgoing trip and a return trip. Even if the customer cancels or does not appear for the outgoing trip, RTS Access will provide the return trip as scheduled unless the customer cancels it. 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. In such instances, RTS Access will use its best efforts to schedule a return trip for a customer who misses the originally scheduled trip, but RTS Access cannot guarantee a Pickup Period in the event it is able to schedule the trip. Additionally RTS Access will only schedule return trips during regular service hours. The RTS Access No Strand Policy applies only to the return ride of a round-trip scheduled with RTS Access. RTS Access will not provide return service for customers who fail to show up for a return trip scheduled at the Final Pickup Period (Single No-Show), or when customers book a one-way trip, or for customers who request to disembark from the vehicle before reaching their scheduled destination. Customers have the option of calling 585-224-8330, Option 3 to find out whether it is possible to reserve a trip for later that same day (“Same-day Service”). Same-day trips can be reserved only if space is available and only during regular service hours. Same-day Service costs $6.00 plus distance-based fare ($1.50 to $4.00). Customers must pay the RTS Access Bus Operator the exact fare upon boarding; RTS Access cannot transport customers who do not pay the fare.

If the distance to the destination is 1 mile or less, the Distance Fare is $1.50, the Same-day Fare is $6.00 and the total fare is $7.50.

If the distance to the destination is 1 to 3 miles, the Distance Fare is $1.75, the Same-day Fare is $6.00 and the total fare is $7.75.

If the distance to the destination is 3 to 20 miles, the Distance Fare is $2.00, the Same-day Fare is $6.00 and the total fare is $8.00.

If the distance to the destination is over 20 miles, the Distance Fare is $4.00, the Same-day Fare is $6.00 and the total fare is $10.50.

If the Same-day trip is for a destination in the supplemental service area, add $6.00 to the total fare.

End of proposed Paratransit "No Strand" Policy.

End of Exhibit 8.

EXHIBIT 9: TIME-LINE OF IMPLEMENTATION

This exhibits contains the text of the RGRTA resolutions authorizing actions related to paratransit service from 1987 to 2014.

# 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 (ADA) 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 ADA 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 ADA implementation and proposed activities to be undertaken during 1993 in an effort to achieve full compliance; and WHEREAS, the 1993 ADA 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 ADA 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 ADA PLAN UPDATE

WHEREAS, the Rochester-Genesee Regional Transportation Authority adopted an ADA 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 ADA implementation and proposed activities to be undertaken during 1994 in an effort to achieve full compliance; and WHEREAS, the 1994 ADA 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 ADA Plan Update. NOW, THEREFORE, BE IT RESOLVED that the Commissioners of the Rochester-Genesee Regional Transportation Authority do hereby approve the 1994 ADA 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 ADA PARATRANSIT PLAN UPDATE

WHEREAS, the Rochester-Genesee Regional Transportation Authority (the "Authority") adopted an ADA 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 ADA 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 ADA Paratransit Plan Update. NOW, THEREFORE, BE IT RESOLVED that the Commissioners of the Rochester-Genesee Regional Transportation Authority do hereby approve the 1995 ADA 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 ADA PARATRANSIT PLAN UPDATE

WHEREAS, the Rochester-Genesee Regional Transportation Authority (the "Authority") adopted an ADA 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 ADA implementation and proposed activities to be undertaken during 1996 in an effort to achieve full compliance; and WHEREAS, the 1996 ADA 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 ADA Paratransit Plan Update. NOW, THEREFORE, BE IT RESOLVED that the Commissioners of the Rochester-Genesee Regional Transportation Authority do hereby approve the 1996 ADA 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.

# RGRTA 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 (ADA) 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 RGRTA 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: RGRTA 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 RGRTA 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.

# Annex to RGRTA 55-2014

The annex to the resolution contains the summary of Public Comments and the Paratransit Plan Updates as presented to the Board.

# Public Comments and Response (2014)

RGRTA Responds to Questions and Comments from Customers Regarding Proposed Changes to Paratransit Service

The Rochester Genesee Regional Transportation Authority (RGRTA) is providing official responses to questions, comments and concerns communicated between July 8 and July 24, 2014 in response to the Public Hearing regarding proposed changes to Paratransit Service. The questions, comments and concerns raised, along with adjustments to the proposal for service changes, will be shared with the RGRTA Board of Commissioners in September 2014.

## Public Comments from 2014, Topic: Service Area Concern

1. Comment from Anonymous via Public Information/Hearing Comment Card: Why are you cutting the service area?

2. Comment from Pamela Taggart via Public Information/Hearing Comment Card: Some people can't walk half a mile (into the service area].

3. Comment from Debbie Leary via Public Hearing: I don't think that cut [to the service area] is necessary.

4. Comment from Dan Sulimowicz via Public Hearing: Lift Line should really be wherever anybody could go in Monroe County. You're tying people down by saying they can only have certain amounts with their destination and supplemental area.

5. Comment from Rene LaTorre, ABVI via Letter: Reduction of service area to 234 miles is another area of concern [...] Since paratransit service areas only follow the fixed route system, this is already limiting and many people with disabilities are not being served because they do not live within the service area. By restricting the service area even more, you are just increasing gaps in the service.

6. Comment from Nancy Miner via Public Hearing: The pullback of the supplemental service area [concerns me]. I understand they say that it only impacts twenty people. I would like to possibly challenge that number. I know that it affects me and I bet I probably wasn't counted in that number. I do need to go to those areas. I don't go there every week. I don't go there every day, but I do need to go into that area. Maybe we could have an increase in fee. I know we don't like to see that, but it’s better than not having service at all.

7. Comment from Carol Herring via Public Hearing: I couldn't go [to a family function] because I didn't have the transportation. It would be nice if it [the service area was] extended a little bit. I would be willing to pay [for transportation into an extended service area].

8. Comment from Kevin Figler via Public Hearing: I don't know how they arrived at twenty People [who would be impacted by the change in service area] when I thought of six people. And that was just in one town.

9. Comment from Paula Mathews via Public Hearing: This is about the second cut in the paratransit in ten years. ADA law is a recommendation. It is not cut in stone so you don't have to cut out those twenty people [as a result of the proposed change to the service area]. Now, they can look that Orleans is part of RTS. How come Lift Line isn't being extended out to there?

10. Comment from Dave Sutliff- Atlas, Center For Disability Rights via Public Hearing: The ADA and the FTA never says you have to contract service. To say that you're contracting service, that you're cutting people out to comply with the ADA or the FTA is legally wrong, it's factually wrong and really offensive to the people in the disability community.

You can't get housing there if you have a disability, because there isn't transportation for you. And so now you're expanding that dead zone where people who have disabilities can no longer live. And, for a lot of those people, they're going to end up in institutions. So to help you save money, do you insist on saving money by cutting these twenty people out [who would be impacted by the change in service area]? We're proposing to help do [RTS's) bottom line as well by working to eliminate performance incentive compensation. That would be the three hundred thousand dollars that was paid out last year in executive bonuses [...] and restore those twenty people to keep them out of institutions and allow people who are in institutions to come out and maybe live in those areas too.

## RTS Response to Service Area Concern Comments (2014)

Thank you for sharing your feedback and concerns. With limited resources, providing services beyond what has been outlined by the ADA hampers our ability to address the current and growing needs within our designated service area. The change proposed will help us to better meet those needs and improve service within the ADA designated service area RTS is aware of the areas within our region that are currently not being serviced. We are not the only provider of services for people with mobility needs. We are taking the lead to develop a Mobility Management plan that will identify and make best use of transportation resources that exist throughout our region. Our goal is to establish a system that links paratransit customers with the appropriate transportation services to meet their individual needs. RTS will provide information and assistance to individuals who find they have difficulty getting into our service area as a result of the service area change. Please note that while some customers have said they are willing to pay more in order to receive service, FTA regulations state that paratransit fares within the service area can be no more than double the fare charged for fixed route service.

## Public Comments from 2014, Topic: Scheduling Concern

1. Comment from Anonymous via Public Information/Hearing Comment Card: Why can't someone get through on the phones to book a ride? Some days, I cannot get through.

2. Comment from Anonymous via Public Information/Hearing Comment Card: Are you going to change service hours?

3. Comment from Lori Cmelko via Public Hearing: I'm in favor of the one to seven days in advance scheduling, but I'm concerned that people trying to schedule will crowd the system on the first day and then day four or five, there won't be any rides left for day seven.

4. Comment from Lori Cmelko via Public Hearing: That is my biggest complaint about Lift Line in the last six months or so. It seems like they deliberately downsized their pool of schedulers and it created an unacceptable situation for riders trying to schedule. This past week I was on hold for two and a quarter hours trying to schedule. ] would like Lift Line to be required to beef up their scheduling staff temporarily until they can demonstrate that these updates are going to shorten the hold time to make a difference.

5. Comment from Rene Latorre, ABVI via Letter: The most glaring area that needs the greatest amount of improvement is the schedule of rides. Many have reported up to 2.5 hours or more of wait time before they talk to a scheduler [...] There was a dramatic increase when Lift Line reduced their number of schedulers by half. The Americans with Disabilities Act (ADA) prohibits any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons. A pattern or practice involves the regular or repeated actions, not isolated, accidental, or singular incidents, Sect. 37.131(b)(...) It was stated that R-GRTA feels they have "the appropriate number of staff" in the scheduling department. I strongly disagree with this statement and feel that the wait times will not significantly change even with the new automated voice response system in place. We strongly urge you to consider changing the timing of [the automated call ...]. It would be much more sensible to call the ride while the bus is still there rather than after it leaves.[Regarding the [scheduling 7 days ahead instead of 3: since the rider can schedule even more rides up to a week [in advance] each call will take longer, effecting those long wait times once again.

6. Comment from Oscar Kpota, Empire Justice Center via Public Hearing: Many riders have commented that they were on the phone for one, two or three hours waiting in queue just to schedule a ride. These excessive hold times are unacceptable. They amount to a capacity constraint limiting the availability of paratransit service. This is expressly forbidden by ADA regulations.

7. Comment from Dave Sutliff- Atias, Center For Disability Rights via Public Hearing: The new technology that's been purchased and drivers having a no-show button that sends an automated call that the driver is leaving, we've already talked about that. I talked with some folks and they said that they could be programmed so that the button could be pushed when the driver gets there and to let you know that the driver is there. You must be told that you have the ability to do that and in the program it should be right from the beginning, not do the punitive thing first.

## RTS Response to Scheduling Concern Comments (2014)

Thank you for your comments and questions. To help address lengthy hold times, we are installing a new Interactive Voice Response (IVR) phone system this fall. RTS Access currently experiences heavy volume from those calling to confirm or cancel a ride. The IVR phone system will provide automated confirmation and cancellation options around the clock. This will reduce overall call volume and give customers seeking to book a ride easier access to our Schedulers. We have taken steps to address the issue of unexpected phone system outages. Our utility company has made improvements to the system infrastructure and additional equipment to support our phone system has been purchased. By addressing these issues, we feel the number of schedulers on staff is appropriate. In addition, we are providing a wider scheduling window to provide customers with greater flexibility. We will be expanding scheduling time to up to seven days in advance of a ride, and allowing reservations to be made seven days a week. We are also rolling out an automatic reminder call to customers the day before to a scheduled pick up. If you do not make your scheduled ride, you will be counted as a "no show" in our system. We hope these reminder calls will reduce the number of people who miss their ride and ease scheduling concerns.

## Public Comments from 2014, Topic: Certification Concern

1. Comment from Debbie Leary via Public Hearing: You are still telling people who are qualified for the paratransit that they can use the RTS bus. Yet, if they go recertify or even at the time of application, you say you can use the RTS, you, basically, disqualify yourself. I call that entrapment.

2. Comment from Rene LaTorre, ABVI via Letter: I strongly recommend that the application for the rider who is recertifying be streamlined.

3. Comment from Stella Range via Public Hearing: In the past the [eligibility [application was filled out by your doctors. Will that still be the process or are you going to change the process [so that customers are) qualified by a different group of people?

4. Comment from Oscar Kpota, Empire Justice Center via Public Hearing: We are very concerned about the application process, as well as the appeal process, which seems to violate ADA regulations and the Due Process provision of the 14th Amendment. The Proposed Plan in its current form does not address any of these concerns. The recertification process is unduly burdensome, requiring individuals to submit a whole new application each time. The functional assessment is crudely designed and does not reflect conditions on a real RTS bus. Individuals with disabilities are not given enough notice about the reason why they are being denied and are not allowed time for them to prepare for a hearing. They are not told that they are entitled to review their file or to bring legal representation to the hearing. Denials are affirmed by a minority vote because there are often not enough committee members present. The evidence of treating physicians is often disregarded despite the lack of contradicting medical evidence. Staff who make initial denial decisions are permitted to be present when the Appeals Committee makes its decision. Many customers denied at recertification have conditions that have only gotten worse, not better, since they originally qualified for the service.

## RTS Response to Certification Concern Comments (2014)

Thank you for your comments. If the proposed updates are approved, the application will be revised so that we have more complete information about each applicants' specific needs; Customers with permanent, chronic or developmental disabilities may no longer have to be re-certified every three years; and Physicians and certified professionals will be required to complete the application's medical section. Applicants may also submit a Patient Care Plan (PCP) with their application; medical information provided with applications for service is never disregarded. We also propose to extend conditional eligibility from November 1 to March 31 to October 1 to April 30. Customers who do not qualify for re-certification will be provided with 3-month temporary eligibility if they have used Lift Line service in the prior 6 months. Customers always have the right to review their files. Individuals who have been denied recertification are given 60 days to request an appeal. Customers have the right to bring anyone they chose to the appeals hearing. This information will be included in future customer publications. In situations where there have not been enough Appeal Committee members present at the appeal to ensure all required duties and tasks were completed, staff has been present. The Appeals committee is being restructured to help ensure enough Appeal Committee members are available to hear appeals. The functional assessment is currently under review.

## Public Comments from 2014, Topic: Fare Concern

1. Comment from Anthony Griggs via Public Hearing: I don't like the fare change at all. Six dollars in the same-day ride. We need to make it, like, four dollars, the same-day ride. But we can't afford six dollars, because that would be twelve dollars.

2. Comment from Nancy Miner via Public Hearing: I disagree with is the proposed fee change for those that are found ineligible. I hope that we can find a way that they can still be half fare and not full fare.

3. Comment from Kevin Figler via Public Hearing: How did they come to their conclusion, that they could charge six dollars [for access to the service area] even though that's not changing?

4. Comment from Paula Mathews via Public Hearing: The fare structure is a problem that most people who were using Lift Line are on a limited income. So to increase the fare structure or to keep charging, you don't do that to able-bodied people who ride regular line service.

## RTS Response to Fare Concern Comments (2014)

Thank you for sharing your concerns. We are not proposing any fare changes for eligible customers riding paratransit service. We are reviewing the proposed fare increase for riders found ineligible to ride RTS Access. The fare for supplemental and same-day service has not changed. This fare is not distance based. It is a flat charge in addition to the distance-based fare. When possible, booking a ride in advance [a day or more before the ride) eliminates having to pay the higher, same-day $6 fare.

## Public Comments from 2014, Topic: Travel Concern (2014)

1. Comment from Rene Latorre, ABVI via Letter: Your effort to "increase efficiencies" has been resulting in longer bus rides, especially for riders living further out in the suburbs. Many riders are currently experiencing trip times exceeding one hour and by placing even more people on the bus, rides will become that much longer.

2. Comment from Lynne Chukhin via Public Information/Hearing Comment Card: Can dialysis trips be prioritized so clients can arrive on time to their appointments?

RTS Response to Travel Concern Comments (2014)

Thank you for your question. We would like to create a subscription pool for customers who travel to and from the same destinations on the same days and times on a weekly basis. Benefits for the customers in the subscription pool include: No need to make an advance reservation—customers' regular trips are already scheduled; Customers only calls Lift Line when they need to cancel a subscription trip or schedule a different trip; Faster, more efficient service for all customers.

## Public Comments from 2014, Topic: General Service Concern and RTS Response (2014)

1. Comment from Lynne Chukhin via Public Information/Hearing Comment Card: Why are clients turned down for rides to church?

Response from RTS: Thank you for your question. Rides are booked based on times and availability, not on destinations.

2. Comment from Lynne Chukhin via Public Information/Hearing Comment Card: Would you be interested in identifying housing complexes within the service area to help encourage individuals to move within the service area?

Response from RTS: Thank you for this suggestion. We ask that applicants check before completing an application to ensure that their pick-up and destinations points are within our service area. We also ask that customers check with us before moving, accepting a job, or enrolling in school to see if those locations are in the service.

3. Comment from Ron Harris via Public Information/Hearing Comment Card: Please send a map.

Response from RTS: A map was sent to the address you provided. You may also view a map of the proposed service area on myRTS.com/access.

4. Comment from Anonymous via Public Information/Hearing Comment Card: What kind of buses are you going to have in the future?

Response from RTS: Thank you for your interest. Prior to purchasing new buses, we go through an in-depth review of bus specifications, features, and options in order to purchase vehicles that best meet the needs of our customers. We expect to continue using our current, 25-foot buses and well as more, four-door sedans which we introduced earlier this year.

5. Comment from Patricia Taggart via Public Information/Hearing Comment Card: I go to Unity at Ridgeway, where there aren't any buses. All my medical services are there. I need Lift Line all year.

Response from RTS: Thank you for sharing your concern. We have shared your comment with our Service Planning team. The 3A Lyell to Greece Ridge bus goes to Ridgeway and Long Pond Rd., which is 0.2 miles from Unity at Ridgeway. Returning from Unity at Ridgeway, the 3 Goodman can be boarded at bus stop #2254, which is across the street from Unity at the corner of Ridgeway and Long Pond. For more detailed information, please contact RTS Customer Service at 585-288-1700 Monroe@myRTS.com.

6. Comment from Anonymous via Public Information/Hearing Comment Card: The college gets a Rt. 20 weekend bus. It should stop at the Park & Ride.

Response from RTS: Thank you for your comment. We have shared your comment with our Service Planning team for future consideration.

7. Comment from Anonymous via Public Information/Hearing Comment Card: I took Lift Line to a Red Wings game, but it was rained out early. I couldn't get a Lift Line bus to take me back home, so I had to wait at the ballpark for hours.

Response from RTS: Thank you for sharing your comment. Customers who reach their destination and find that an appointment or event has been cancelled or rescheduled should contact RTS Access at 585-224-8330to see if there is a bus in the area or a bus that can be sent for their pick-up. If we can locate a bus for an earlier pick-up we will do so. As a public transportation service, however, we may not be able to accommodate a change in a scheduled pick-up time.

8. Comment from Pamela Taggart via Public Information/Hearing Comment Card: Bus Operators should help people to their door.

Response from RTS: Thank you for your comment. We have clarified the policies for requesting and delivering enhanced Curb-to-Curb service for customers who have difficulty walking or carrying packages. When customers request this service, a Bus Operator will assist the customer from their front door to the bus and then from the bus to the front door of the customer's destination. Bus Operators can also help carry groceries or other light packages. Please contact RTS Access at 585-224-8330 to learn more.

9. Comment from Rosa Simpson via Public Hearing: My mother, Joanna Carter, is in desperate need of Lift Line. My mother cannot read or write. She often gets lost riding the City buses because she has no knowledge of what is reading on the bus. When my mother got lost, she gets very scared and upset. Please grant my mother the right to have Lift Line year round. She really needs it. I don't want her to get lost or even hurt herself trying to find her way. Please, help her.

Response from RTS: Thank you for sharing your concern. How to Ride the Bus training is available through organizations and agencies within our community. This training teaches individuals going to routine locations how to use the bus and what to do in situations such as bus detours, accidents, and other situations where the customer will not be able to get off at their planned bus stop. Call RTS Customer Service at 585-288-1700 for more information.

10. Comment from Dave Sutliff-Atias, Center For Disability Rights: The new Lift Line advisement committee: Great! Awesome! But I will say if the majority of the people on that committee are not Lift Line users, then it’s pretty much something about us without us, we often say in the disability community.

Response from RTS: Thank you for your comment. There will be consumers, advocates and service providers from the ADA community on the new Advisory Committee, and we will take your comment into consideration when forming the committee.

End of Public Comments and Response (2014)

# Paratransit Plan Updates as Presented to the Board (2014)

Paratransit Plan Updates: We are updating our service plan to provide a better customer experience and to respond to the needs of the ADA population and to reflect a change to the Authority's scope with the addition of Ontario County on August 1.

What is a Paratransit Plan? A Paratransit plan details how services are delivered to comply with the Americans with Disabilities Act (ADA) 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) Have RGRTA Commissioners review all comments received; 4) Have the Final Proposed Paratransit Plan approved by the Board of Commissioners; and 5) Submit the Final Proposed Paratransit Plan, as approved by the Board of Commissioners, to the FTA.

Overview of Proposed Paratransit Plan Updates:

1. Revise the application/certification process

2. Streamline subscription service requirements

3. Change to published fare structure

4. Provide new scheduling hours and options

5. Update the service area

About the Paratransit Service Area: The FTA defines the Paratransit Service Area as 3/4 miles beyond fixed route service and the Supplemental Area as 1 1/2 miles from the Paratransit Service Area. The Paratransit Service Area plus the Supplemental Area equals 2 1/4 miles. Today, Lift Line's service area extends to 2-3/4 miles or, in some cases, more. Lift Line is providing supplemental service 2 miles beyond the FTA required 3/4 mile service area. To comply with the FTA, Lift Line is modifying its total service area to 2-1/4 miles.

Proposed Fare Structure: Applicants who are not eligible for paratransit service pay the standard $1.00 RTS fare instead of $0.50.

Public Participation: Initial proposal presented at 4 public listening sessions in July 2014. Review of comments from listening sessions. Public hearing held on July 19, 2014

Review of comments at Public Hearing. Public comments closed on July 24, 2014. Review of comments received. Public comments and responses posted to the website on Monday August 25, 2014.

Public Feedback: Service Area-Requests to make the area larger and/or to make no reductions. What about those affected by the change?: 1) Increase scheduling options; 2) Include on-going customer participation; 3) Create an easier application process for individuals with conditions that will not; and 4) Improve access to subscription service.

Plan Revisions and Conclusions: We continue our commitment to maintaining a supplemental service area at the maximum FTA radius. For the 20 people affected, they will continue to access the service for 6 months with "grandfathered" or acquired access privileges. We have increased our scheduling options with new IVR technology. We will form a new advisory committee for paratransit services. The plan includes a revised and streamlined application and recertification exemption for eligible conditions. Subscription service has been made easier to access.

Recommendation: That the changes to the Paratransit Plan be approved as presented to the Board of Commissioners.

End of Paratransit Plan Updates as Presented to the Board (2014)

End of Annex to RGRTA 55-2014

End of Exhibit 9

EXHIBIT 10: ELIGIBILITY CERTIFICATION

This exhibit contains the following policies and procedures: 1) the proposed Paratransit Eligibility Policy; 2) The text content of the proposed Application for Paratransit Eligibility Certification; 3) the Paratransit Appeal Process and Procedures; 4) the text content of the NOTICE OF INTENT TO APPEAL PARATRANSIT ELIGIBILITY DETERMINATION form; and 5) the text content of flow charts describing the internal steps for processing applications and appeal requests.

# Paratransit Eligibility Policy proposed for the Paratransit Plan 2017-18

RGRTA 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 (ADA). This document describes the application process, eligibility categories, appeal process, recertification requirements, and fares for ADA paratransit-eligible passengers (“customers”) and those accompanying them.

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).

## 1.0. Criteria for Eligibility

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

1. 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).

2. 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.

3. 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.

A person’s diagnosis or use of a mobility aid will not automatically qualify the person as paratransit eligible. Decisions on paratransit eligibility will consider the following: 1) Whether an applicant—due to his/her disability—is unable to travel on a fixed route system; and 2) The level of effort and risk involved for the applicant during such travel.

## 2.0. 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 from Monday-Friday during business hours. Note: RTS Access buses cannot back up from driveways or from dead-end streets without cul-de-sacs (circular areas for turning around).

## 3.0. 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. 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. 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.

### 3.1. Initial Determination

Within 21 days of receiving a fully completed application, RTS Access will issue a written letter explaining the decision for granting or denying eligibility certification. If an interview or a functional assessment is required, RTS Access shall schedule the appointments in advance with the applicant. If the applicant fails to appear for the appointment, the 21-day “clock” stops and does not start until the date the applicant attends his/her interview/assessment.

### 3.2. Certification Type

There are four types of eligibility certification: unconditional, conditional, temporary, and seasonal. Note: in the following descriptions the term "disability" refers to the disability which results in the person being unable to use RTS fixed route service.

Unconditional certification does not expire, is valid for life provided the disability does not change, and the disability is unlikely to improve during the person's lifetime. Note: if the does change, RTS Access reserves the right to require recertification to determine whether there could be a corresponding change in eligibility.

Conditional certification expires every three years, requires regular recertification, includes the possibility that learning specific skills may allow a person with conditional eligibility to use fixed route for some or all trips, and includes the possibility that the disability may improve during the person's lifetime.

Temporary certification expires after a specific period, requires recertification to continue, and is applied to a short-term disability.

Seasonal certification expires every three years, requires regular recertification, allows the certified person to ride paratransit from October 1 to April 30, and includes the possibility that external factors affect or influence the person's disability (such as shorter daylight hours, freezing temperatures, ice, or snow).

If determined eligible, the customer will receive a letter confirming the type of certification granted, a certification card, and appeal procedures. The certification card shall include the name of the eligible individual, a photo of the individual, and the contact information for the RTS Access ADA Certification Coordinator. Cards issued to customers with Temporary, Conditional, or Seasonal Certification will include an expiration date for eligibility. If the customer indicated on his/her application that he/she may travel with a personal care attendant, the acronym “PCA” is also printed on the card. RTS Access will expect eligible customers to show photo ID to the Operator upon boarding the paratransit vehicle. If the customer does not yet have a phot ID card issued by RTS Access, the customer may use another recent photo ID (such as a non-driver ID card, photo driver’s license, or passport) during the interim. If determined ineligible, the person will receive a letter explaining the decision and will receive written appeal procedures.

### 3.3. Recertification

The customer is 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 each customer’s 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. Customers must complete the recertification process before or by no later than the expiration date. RTS Access will issue the customer a new certification card. RTS Access may deny service to customers with expired eligibility certification.

## 4.0. Appeals

An eligibility decision may be appealed in accordance with the paratransit appeal process and procedures. The procedure is provided with the letter granting or denying certification. Appellants must file the appeal within 60 calendar days from the date of the letter granting or denying certification. The appellant shall be given an opportunity to present his/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.

## 5.0. 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: 1) Present documentation of ADA 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 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 his or she is unable to use the fixed route bus system.

End of Paratransit Eligibility Policy proposed for the Paratransit Plan 2017-18

# Text of RTS ACCESS Paratransit Application for Eligibility Certification proposed for the Paratransit Plan 2017-18

## Overview of the Paratransit Application Process

If you are unable to travel on an RTS fixed route bus service due to a disability, you may be eligible to use public paratransit service. Paratransit allows you to schedule specific bus rides instead of following a fixed route bus schedule. You will share a bus ride with other people who are traveling to a similar location and time. RTS Access is a paratransit bus service that operates within certain areas of Monroe County, New York.

Read this entire overview to learn about eligibility and the application process. Read the checklist on the next page and follow each step in list to complete the application. RTS Access will only accept applications that are completed in full. Once we receive the fully completed application, we will notify you within 21 business days.

## How Is Eligibility Determined?

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 such travel. 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.

## When Can I Use RTS Access?

We must certify you as eligible 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. You or your personal representative must complete Parts 1, 2, 3, and 4. After completing these parts, give the entire application to an authorized, licensed health care provider so that he or she can review it and complete Part 5. Your provider must return the entire application with Part 5 completed to you. Do not fax the application or supporting documents. We do not accept faxed applications. If any part of the application is missing or incomplete, we will be unable to determine your eligibility. 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. A licensed health care provider whom you authorize to release your personal health information must fill out Part 5. Your information is confidential, 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 Part 5, it is fraud and invalidates your application. Do not allow a medical office to send separate pages of your application to RTS. Submit all attachments with the application.

## How Can I Get Answers to My Questions About the Application Process?

Call Monday through Friday from 8 am to 5 pm at 585-224-8330, Option #2 or use the "Contact Us" online form.

## How Do I Submit My Application?

Send the entire, complete application to RTS Paratransit Eligibility through one of these three 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 RGRTA at 1372 East Main Street, Rochester, New York 14609. The lobby is open Monday through Friday from 8:00 AM to 5:00 PM.

End of Overview

# Part 1: CHECKLIST in RTS ACCESS Paratransit Application for Eligibility Certification proposed for the Paratransit Plan 2017-18

This is a list of the eight important steps in the application. After you finish each step, type your initials and check the box.

1. Find out if your travel will occur inside the RTS Access Paratransit Service Area. Dial 585-224-8330, Option #3. Ask the Scheduler whether your address and desired travel destinations are within the RTS Access Paratransit Service Area. If you are certified as eligible for paratransit service but you live outside the service area, you will need another way to reach the pick-up points inside the service area, your trips must be within the service area, and you will need another way to travel from an RTS Access drop-off point to your final destination.

I live [pick one of the following choices: inside the paratransit area or outside the paratransit service area].

[Box for your initials] I understand that I cannot use RTS Access for traveling to or from destinations outside the paratransit service area even if I am certified as paratransit eligible.

[Checkbox] I completed step 1 of 8 in this checklist.

2. Fill out Part 2 and Part 3 of the application. In Part 2 of the application, you must provide RTS Access with identification information. It is important to fill out this section accurately, even if you are recertifying, so that RTS Access records are correct. Then, you must complete the all questions in Part 3: Self-Assessment.

[Box for your initials] I provided all the information in Part 2: Identification. I understand that RTS Access cannot process my application if any fields in Part 1 are blank.

[Box for your initials] I answered all the questions in Part 3: Self-Assessment and attest that my answers about my ability or inability to use the regular RTS buses (“fixed route buses”) are truthful. I understand that RTS Access cannot process my application if any fields in Part 2 are blank.

[Checkbox] I completed step 2 of 8 in this checklist.

3. Fill out Part 4 of the application. You must authorize at least one of your licensed health care provider(s) to release your personal health information to RTS Access for the application process. You must be a current patient of the provider. The provider must be qualified to give the specific diagnoses and assessments requested in the application. Examples of qualified providers include medical doctors, psychologists, psychiatrists, licensed mental health professionals, MDS nurses, nurse practitioners, physician’s assistants, optometrists, ophthalmologists, physical therapists, occupational therapists, and certified orientation and mobility specialists. In Part 4, you must type your name and date of birth, type in the contact information for at least one licensed health care provider, and then provide an appropriate signature. If you are under 18 years of age, a parent must sign on your behalf. Otherwise, the signature must be yours or that of your Legal Guardian or Power of Attorney.

[Box for your initials] I provided my name and date of birth. I included contact information for at least one of my current health care providers and I made sure the appropriate signature authorizes the disclosure of my information.

[Checkbox] I completed step 3 of 8 in this checklist.

4. Take your application to your authorized health care provider or providers. Give the entire application to the provider so he or she can review Part 2 and 3. Your provider must complete the assessment in Part 5. Do not separate any of the application pages. Do not allow your provider to separate any of the application pages. Your provider must return the application to you with Part 5 completed and give you at least one of the supporting documents. A supporting document may be your current medical summary, patient care plan, therapy plan, clinical assessment, GAF score, adaptive functioning score, IQ score, visual acuity measurement or hearing acuity measurement. Attach the supporting document(s) to your application with a paperclip.

[Box for your initials] I gave my entire application to my authorized provider. My provider completed Part 5 and returned my application to me along with at least one supporting document.

[Checkbox] I completed step 4 of 8 in this checklist.

5. Decide whether you will include a recent photo of yourself with this application or wait to have your photo taken if you are certified eligible. Sending a photo with the application may expedite the creation of a photo ID if you are certified eligible. Please note that your will photo not be returned. The photo must show your face clearly. If you will mail the photo with the application, attach the photo to the application with paperclip. If you will email a digital or scanned photo of yourself to [access@myrts.com](mailto:access@myrts.com), make sure to put your full name in the subject line. I [pick one of these choices: paper clipped my photo to the application, or emailed my photo (full name in the subject line), or prefer to come to RTS to have my photo taken.].

[Box for your initials] I selected one of the options about the photo.

[Checkbox] I completed step 5 of 8 in this checklist.

6. Review the entire application. Make sure all the questions have answers and all portions that require a signature were signed by the correct person. Attach supporting documents from your licensed health care provider with a paperclip. If you are providing a photo, attach the photo to the application with a paperclip.

[Box for your initials] I made sure all questions on the application have answers and all the necessary signatures are on the application. I attached my supporting documents. If I decided to provide a photo, I have attached it.

[Checkbox] I completed step 6 of 8 in this checklist.

7. Make a copy of the completed application for your personal reference and records. A completed application will not be returned to you. If you attached a photo, it will not be returned to you. The original supporting documents will not be returned to you.

[Box for your initials] I made a copy for my personal records and understand that none of the originals that I send will be returned to me.

[Checkbox] I completed step 7 of 8 in this checklist.

8. Confirm in writing that the information in this application is true and that you understand that providing false information may result in penalties. Provide your signature—or that of your parent, power of attorney or legal guardian. The following Representative signed on my behalf: [pick one of the options: Parent (applicant is a minor), or Power of Attorney, or Legal Guardian, or As the Applicant, I signed on my own behalf.].

[Box for your initials] I understand this application is part of the process to determine eligibility for ADA paratransit service and that giving false information may result in penalties.

[Box for your initials] I understand that RTS Access will only process my complete application in the date order received and that my application must be complete or it will be returned to me.

[Box for your initials] I affirm that the information in this application is true to the best of my knowledge.

Date [Box for the date]

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

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

Mailing Address of Applicant or Personal Representative [Box for the address]

Signature

[Checkbox] I completed step 8 of 8 in this checklist.

End of Part 1 in RTS ACCESS Paratransit Application for Eligibility Certification proposed for the Paratransit Plan 2017-18

# Part 2: IDENTIFICATION in RTS ACCESS Paratransit Application for Eligibility Certification proposed for the Paratransit Plan 2017-18

Date: [Box for the date].

1. Is this application for a recertification? [Pick Yes or No]. If you are recertifying, please enter the date your certification will expire and your identification number. Otherwise, enter “Not applicable” for the expiration and number.

My certification expires on: [box to provide an answer]

My Access Identification Number is: [box to provide an answer]

2. My full name is: [box to provide an answer]

3. My date of birth is: [box to provide an answer]

4. My mailing address is: [box to provide an answer]

5. My email address is: [box to provide an answer]

6. I would like to receive information from RTS Access as [pick one of the following choices: Braille, audio recording, large font hardcopy, regular font hardcopy, accessible PDF file, accessible Microsoft Word file, other format]. In the event that I select “other format” the format should be: [box to provide an answer].

7. I would like RTS Access to send future information to

[Checkbox] My mailing address.

[Checkbox] My email address.

[Checkbox] My information designee’s mailing address. If you picked this choice, answer these questions. My information designee is [box to provide an answer]. My information designee’s mailing address is [box to provide an answer]. My information designee’s email is [box to provide an answer].

8. My home phone number is [box to provide an answer]. My mobile phone number is [box to provide an answer]. My preferred phone number is [pick one of the following choices: my home number, my mobile number, no preference].

9. My emergency contact is [box to provide an answer].

10. The emergency contact is my [box to provide an answer].

11. My emergency contact’s phone number is [box to provide an answer].

End of Part 2 in RTS ACCESS Paratransit Application for Eligibility Certification proposed for the Paratransit Plan 2017-18

# Part 3: SELF-ASSESSMENT in RTS ACCESS Paratransit Application for Eligibility Certification proposed for the Paratransit Plan 2017-18

Please note that using fixed route service (regular RTS buses) does not automatically exclude you from paratransit eligibility.

1. I have the following diagnosed disability/disabilities: [box to provide an answer].

2. I am unable to use regular RTS buses all or some of the time without the assistance of another individual because: [box to provide an answer].

3. Mark all responses that apply to you. If none apply, mark “None of the choices apply to me.” My condition or disability:

[Checkbox] Is constant

[Checkbox] Changes daily

[Checkbox] Changes at different times of day

[Checkbox] Is in remission

[Checkbox] None of the choices apply to me

4. Mark all activities that apply to you. If none apply, mark “None of the choices apply to me.” I am able to do this activity all or some of the time:

[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

5. Mark all the mobility aids that apply to you. I use the following mobility aids all or some of the time:

[Checkbox] Cane

[Checkbox] Crutches

[Checkbox] Walker

[Checkbox] Prosthesis

[Checkbox] Manual wheelchair

[Checkbox] Motorized wheelchair or scooter

[Checkbox] Not applicable – I do not use a mobility aid

[Checkbox] Other type of aid: [box to provide an answer]

6. Mark all the situations that apply to you. I am able to navigate this situation all or some of the time:

[Checkbox] Unpaved 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

7. Mark all answers that apply. I use these modes of transport regularly:

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

[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:

[Checkbox] Other answer: [box to provide an answer]

8. If you selected “Wheelchair or scooter,” please provide additional information about your device. If you do not use a wheelchair or scooter, please mark “Not Applicable” for each question.

a) I weigh [box to provide an answer] pounds. [Checkbox] Not Applicable.

b) My wheelchair or scooter weighs [box to provide an answer] pounds. [Checkbox] Not Applicable.

c) The wheelchair/scooter make and model is [box to provide an answer]. [Checkbox] Not Applicable.

d) The weight limit is [box to provide an answer]. [Checkbox] Not Applicable.

e) The battery life is [box to provide an answer] minutes. [Checkbox] Not Applicable.

f) The maximum distance it can travel is [box to provide an answer] miles. [Checkbox] Not Applicable.

9. Mark all distances that apply when traveling outdoors on your own in mild weather. “Mild” is used in the same context as weather forecasters apply it and is meant convey weather that is generically comfortable, moderate, or temperate.

a) When traveling to and from the bus stop nearest to my residence, I [pick one of the following choices: can walk the distance without a mobility device; or can walk the distance with a mobility device; or can go this distance using my manual wheelchair; or can go this distance using my mobility device; or require assistance, I cannot travel this distance].

b) When traveling to the curb only, I [pick one of the following choices: can walk the distance without a mobility device; or can walk the distance with a mobility device; or can go this distance using my manual wheelchair; or can go this distance using my mobility device; or require assistance, I cannot travel this distance].

c) When traveling 1 block, I [pick one of the following choices: can walk the distance without a mobility device; or can walk the distance with a mobility device; or can go this distance using my manual wheelchair; or can go this distance using my mobility device; or require assistance, I cannot travel this distance].

d) When traveling 3 blocks or ¼ mile, I [pick one of the following choices: can walk the distance without a mobility device; or can walk the distance with a mobility device; or can go this distance using my manual wheelchair; or can go this distance using my mobility device; or require assistance, I cannot travel this distance].

e) When traveling 6 blocks or ½ mile, I [pick one of the following choices: can walk the distance without a mobility device; or can walk the distance with a mobility device; or can go this distance using my manual wheelchair; or can go this distance using my mobility device; or require assistance, I cannot travel this distance].

f) When traveling 9 blocks or ¾ mile, [pick one of the following choices: can walk the distance without a mobility device; or can walk the distance with a mobility device; or can go this distance using my manual wheelchair; or can go this distance using my mobility device; or require assistance, I cannot travel this distance].

10. Mark all conditions that apply. The following weather conditions will affect my ability to travel outdoors on my own and would modify my answers to the previous question.

[Checkbox] Not applicable

[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 weather condition: [box to provide an answer]

11. I can reasonably travel this distance under optimal conditions in an accessible area on my own: [box to provide an answer] (pick one of the following choices: feet, blocks, or miles).

12. I [pick one of the following choices: can, cannot, other answer] cross a two-lane street [pick one of the following choices: with help; on my own without help; sometimes on my own; at all]. If you picked “Other Answer” please explain [box to provide an answer].

13. I [pick one of the following choices: can, cannot, other answer] cross a four-lane highway with traffic lights [pick one of the following choices: with help; on my own without help; sometimes on my own; at all]. If you picked “Other Answer” please explain [box to provide an answer].

14. 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

[Checkbox] Prefer not to answer

End of Part 3 in RTS ACCESS Paratransit Application for Eligibility Certification proposed for the Paratransit Plan 2017-18

# Part 4: AUTHORIZATION TO DISCLOSE PROTECTED HEALTH INFORMATION in RTS ACCESS Paratransit Application for Eligibility Certification proposed for the Paratransit Plan 2017-18

Applicant’s Name [box to provide an answer]

Applicant’s Date of Birth [box to provide an answer]

I authorize the provider(s) named here, his/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. Information for Licensed Health Care Provider #1 (Required)

Provider’s Name: [box to provide an answer]

Office or Facility Address: [box to provide an answer]

Office Phone Number: [box to provide an answer]

You may authorize more than one provider. If you do not wish to do so, select “Not Applicable.”

## 2. Second Licensed Health Care Provider (Optional)

[Checkbox] Not Applicable

Second Provider Name: [box to provide an answer]

Second Office or Facility Address: [box to provide an answer]

Second Office Phone Number: [box to provide an answer]

## 3. Third Licensed Health Care Provider (Optional)

[Checkbox] Not Applicable

Third Provider Name: [box to provide an answer]

Third Office or Facility Address: [box to provide an answer]

Third Office Phone Number: [box to provide an 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 name 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.

The following Representative signed on my behalf: [pick one of the options: Parent (applicant is a minor), or Power of Attorney, or Legal Guardian, or As the Applicant, I signed on my own behalf].

Date: [box to provide an answer]

Name: [box to provide an answer]

Phone Number: [box to provide an answer] [pick one of the options: This is my phone number; or This is my Personal Representative's phone number.]

Mailing Address: [box to provide an answer] [pick one of the options: This is my address; or This is my Personal Representative's address.]

Signature

End of Part 4 in RTS ACCESS Paratransit Application for Eligibility Certification proposed for the Paratransit Plan 2017-18

# Part 5: HEALTH CARE PROVIDER ASSESSMENT AND VERIFICATION in RTS ACCESS Paratransit Application for Eligibility Certification proposed for the Paratransit Plan 2017-18

Attention Applicants: This part must be completed by a licensed or certified professional or disability service provider who is qualified to render the specific diagnoses and assessments. You, or your representative, are responsible for getting the application to the provider/professional, collecting the completed application and supporting material, and ensuring that the entire application is submitted to RTS Access.

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). Your patient/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/her disability, is unable to use the regular ADA 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/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. Check all that apply. I am a New York State licensed:

[Checkbox] Certified Orientation and Mobility Specialist

[Checkbox] Licensed Mental Health Professional

[Checkbox] MDS Nurse (Skilled Nursing Facilities Only)

[Checkbox] Medical Doctor (MD or DO)

[Checkbox] Nurse Practitioner (ARNP)

[Checkbox] Occupational Therapist

[Checkbox] Ophthalmologist

[Checkbox] Optometrist

[Checkbox] Physical Therapist

[Checkbox] Physician’s Assistant

[Checkbox] Psychiatrist (MD or DO)

[Checkbox] Psychologist (Ph. D.)

2. Licensed Professional Identification (please print clearly):

Name: [box to provide an answer]

License #: [box to provide New York State Certification Number or License Number]

Contact: [box to provide phone number, business address, email)

3. Patient/Client Identification (please print clearly)

Name: [box to provide an answer]

Date of Birth: [box to provide an answer]

4. List the condition that would prevent the Patient/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 provided.

### #1 Diagnosis/Condition (not symptoms) [box to provide an answer]

Degree (mark all that apply)

[Checkbox] Mild

[Checkbox] Moderate

[Checkbox] Severe

[Checkbox] Episodic

[Checkbox] Permanent

[Checkbox] Active

Status (mark all that apply)

[Checkbox] Temporary

[Checkbox] In Remission

[Checkbox] Controlled w/ Medication

### #2 Diagnosis/Condition (not symptoms) [box to provide an answer]

Degree (mark all that apply)

[Checkbox] Mild

[Checkbox] Moderate

[Checkbox] Severe

[Checkbox] Episodic

[Checkbox] Permanent

[Checkbox] Active

Status (mark all that apply)

[Checkbox] Temporary

[Checkbox] In Remission

[Checkbox] Controlled w/ Medication

### #3 Diagnosis/Condition (not symptoms) [box to provide an answer]

Degree (mark all that apply)

[Checkbox] Mild

[Checkbox] Moderate

[Checkbox] Severe

[Checkbox] Episodic

[Checkbox] Permanent

[Checkbox] Active

Status (mark all that apply)

[Checkbox] Temporary

[Checkbox] In Remission

[Checkbox] Controlled w/ Medication

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

[Checkbox] Yes

[Checkbox] No

[Checkbox] Somewhat

If NO or SOMEWHAT, explain below: [box to provide an answer]

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

Physical Mobility

[Checkbox] Current Medical Summary (or Patient Care plan)

[Checkbox] Current Therapy plan (PT or OT)

Cognitive, Mental Health, or Neurological

[Checkbox] Current Clinical Assessment

[Checkbox] Current GAF score

[Checkbox] Current Adaptive Functioning score

[Checkbox] Current IQ score

Sensory Measure

[Checkbox] Visual acuity

[Checkbox] Hearing acuity

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/client is currently under my care and I am authorized to release his/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 "(ADA) 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 [box to provide an answer]

Signature of the Authorized Licensed Health Care Provider

Date [box to provide an answer]

End of Part 5 and End of RTS ACCESS Paratransit Application for Eligibility Certification proposed for the Paratransit Plan 2017-18

# Paratransit Appeal Process and Procedures proposed for the Paratransit Plan 2017-18

## 1.0. Overview

The Rochester Genesee Regional Transportation Authority (RGRTA) provides complementary paratransit services in Monroe County through Regional Transit Service (RTS) Access. This Procedure explains the process for appealing a denial of paratransit service eligibility, appealing the type of eligibility, appealing a paratransit service suspension determination based on Repeated No-Show Violations, 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. Applicants who are denied paratransit eligibility or who dispute the eligibility determination (eligibility type) shall have the right to appeal a denial of eligibility. Certified eligible paratransit customers suspended from service for incurring Repeated No-Show Violations shall have the right to appeal the service suspension determination. Certified eligible paratransit customers suspended from service due to Prohibited Conduct under the Rules of Conduct shall have the right to appeal the service suspension determination. Authority and RGRTA 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.

## 2.0. Appealing an Eligibility Certification Denial or Type

Upon issuing notification of a denial of an application for paratransit eligibility, or notification of a specific type of eligibility certification, RTS Access shall explain the reasons for the determination and provide notification of the individual’s right to appeal. RTS Access shall also provide the individual with a form that the individual shall use to request an appeal. Individuals shall have 60 days from the date of the notice of denied eligibility/notice of eligibility type to file an appeal. In order to be timely, an appeal must be within 60 calendar days of the date of the notice of eligibility denial/notice of eligibility type.

The appellant has the right to be heard in-person for the appeal. An appellant may include the basis or reasons for the appeal along with the appeal request at his/her discretion. The appellant may choose to submit written information in advance of a scheduled appeal hearing.

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.

## 3.0. Appealing Service Suspensions Issued for Repeated No-Show Violations

Upon issuing an order for suspension of paratransit service, RTS Access shall explain the reasons for the determination, set forth the proposed sanction (number of days suspended) and provide notification of the individual’s right to appeal. RTS Access shall also provide the individual with a form that the individual shall use to request an appeal. Individuals shall have 14 days from the date of an order of service suspension in which to file an appeal. If the individual files an appeal before the suspension start date, RTS Access postpones the suspension during the appeal process. In order to be timely, an appeal must be within 14 days of the date of the received service suspension order being appealed. Pursuant to the provisions of 49 CFR Part 37 Subchapter § 37.125(h) the filing of a timely appeal of an order of service suspension shall stay the sanction imposed until the hearing process is complete. The appellant has the right to be heard in-person for the appeal. An appellant may include the basis or reasons for the appeal along with the appeal request at his/her discretion. An appellant may appeal the basis for a proposed suspension even if he/she elects not to dispute any individual No-Show. The appellant may choose to submit written information in advance of a scheduled appeal hearing. 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.

## 4.0. Service Suspensions Issued for Prohibited Conduct

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 RGRTA’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. The Appeal Procedure is provided in the Rules and shall apply.

## 5.0. Scheduling an In-Person Appeal Hearing

The RTS Access Paratransit Appeals Committee (hereafter referred to as “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, except that RTS Access shall provide individuals filing the appeal with at least 10 days written notice of the date of the scheduled appeal hearing. Consequently, any appeals received within the 10-day period prior to a scheduled Committee meeting shall be scheduled for the following month’s regularly scheduled meeting to permit at least 10 days written notice of the scheduled appeal date. RTS Access shall provide the individual filing the appeal with a written notice of the scheduled appeal hearing. Said notice shall include the date, time, and location of the scheduled hearing. Said notice shall also include notice that the individual may elect to bring a representative of his/her choosing to assist in the appeal. Said notice shall also include notification that the individual has the right to present any new evidence, orally or in written form, that he/she believes supports his/her eligibility for paratransit services, or which supports his/her right to continued paratransit services. If the appellant is unavailable on the originally schedule hearing date, RTS Access will reschedule the hearing for the following month.

## 6.0. Hearings for Appeals of Eligibility or Service Suspensions Due to Repeated No-Show Violations

Each Committee shall convene with three hearing officers. RTS Access shall develop a pool of hearing officers. RTS Access may recruit hearing officers from any source that RGRTA deems appropriate so long as the individuals selected are not involved in the RTS Access initial determination processes for eligibility or for service suspension. RTS Access shall select three members from the hearing officer pool to preside over each Committee hearing no later than 10 days prior to the scheduled hearing. Ten days prior to the scheduled hearing, RTS Access shall provide each hearing officer with the docket of appeals to be heard. RTS Access shall require that each hearing officer inform RTS Access of any personal, financial, and/or professional relationships the hearing officer has with any appellant before the Committee. If a hearing officer declares a personal, financial, or professional relationship with an appellant, RTS Access shall remove the hearing officer from the panel hearing the individual’s appeal, and shall replace the hearing officer with another hearing officer who does not have any personal, financial, or professional relationship with the appellant. Hearings shall be conducted in a manner that provides the appellant with a fair opportunity to present his/her reasons for believing that he/she qualifies for paratransit services or his/her reasons for believing that the ordered service suspension is improper. The appellant must be given the opportunity to respond directly to each reason cited by RTS Access to justify the denial of eligibility or order of service suspension.

The regular order of the hearing will be as follows:

1. Opening of hearing;

2. Introduction of parties;

3. Presentation of RTS Access denial/suspension rationale;

4. Presentation of the appellant’s rationale as to why he/she should have been found eligible for RTS Access paratransit service or why RTS Access should not suspend him/her;

5. Questions from the hearing officers;

6. Closing of the hearing, including an explanation of the decision issuance process.

Although the hearing must be conducted in a manner that presents the appellant with a fair opportunity to present his/her case, hearings are intended to be informal proceedings. As such, no formal rules of evidence or formal administrative law or judicial procedures apply. As such, 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. 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.

### 6.1. Deliberations

After the hearing closes, the Committee shall deliberate until it reaches a decision regarding the appeal. The Committee shall exclude both the appellant and the RTS Access staff presenting RTS Access’s eligibility determination 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 eligibility or service suspension; and 2) shall not be a supervisor or subordinate of the person making the eligibility/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/her decision (i.e. vote) and rationale for it on a form provided by RTS Access. The Committee’s decision shall be final. RTS Access shall issue a written decision to the appellant within 30 days of the hearing date. The decision letter shall be prepared by an individual who is neither 1) involved in the initial eligibility/suspension determination; nor 2) a supervisor or subordinate of the person making the eligibility determination. The decision letter shall accurately reflect the decision of the Committee. If the decision upholds RTS Access’s initial determination of eligibility denial 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 a denial of paratransit eligibility is not issued within 30 days of the hearing, pursuant to the provisions of 49 CFR Part 37 Subchapter F §37.125(g)(3) RTS shall deem the individual eligible for paratransit services until a written decision is issued.

### 6.2. Record of Proceedings

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 initial eligibility/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 initial eligibility/suspension determination;

4. A copy of all evidence presented by the appealing individual in support of his/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.

End of Paratransit Appeal Process and Procedures proposed for the Paratransit Plan 2017-18

Text content of the NOTICE OF INTENT TO APPEAL PARATRANSIT ELIGIBILITY DETERMINATION form

# Notice of Intent to Appeal Paratransit Eligibility Determination

Name: [box to provide an answer]

Address: [box to provide an answer]

Telephone: [box to provide an answer]

I am appealing (choose one)

[Checkbox] Denial of Paratransit Eligibility (Appeals must be postmarked within 60 days of the decision date).

[Checkbox] Paratransit Eligibility Determination (Appeals must be postmarked within 60 days of the decision date).

The decision I am appealing is dated: [box to provide an answer]

I understand that upon receipt of this Notice of Intent to Appeal, RTS Access will schedule my appeal to be heard by the RTS Paratransit Appeals Committee. RTS Access will provide me with at least 10 days written notice of when and where the appeal will be heard. I further understand that I have the right to present evidence to the committee, both in writing and orally, regarding why I believe the RTS Access decision that I am appealing is wrong. I understand that I may bring a representative of my choice to the hearing to assist in the presentation of my appeal. I further understand that the RTS Paratransit Appeals Committee will render a decision within 30 days of the appeal hearing, and that all decisions of the Paratransit Appeals Committee are final.

[Checkbox] I have a disability that requires a Reasonable Accommodation pursuant to the Americans with Disabilities Act of 1990 in order to participate in the appeal hearing.

I request the following Reasonable Accommodation: [box to provide an answer]

I request the above accommodation due to the following disabilities: [box to provide an answer]

I believe that the RTS Access decision that I am appealing is wrong because (please attach additional sheets if needed): [box to provide an answer]

Signature: [box to provide signature]

Please mail this completed appeal form to:

RTS Paratransit Services

Appeals Coordinator

1372 East Main Street

Rochester, NY 14609

End of Notice of Intent to Appeal Paratransit Eligibility Determination

# 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?

a) If Yes, verify information, click on new case, case type inquiry, close, and send application.

b) 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?

a) If No, fill in info about what is missing and generate letter. Send letter and original application to customer.

b) If Yes, enter the complete date in CRM.

5. Is the application for recertification?

a) 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 denied, enter the date and reason for denial. Prepare the denial letter with appeal rights and form information and mail to customer. Close the case in CRM.

b) If No, approve the application or perform the functional assessment if necessary. If the application for certification is denied, enter the date and reason for denial. Prepare the denial 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?

a) 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.

b) If No, Enter assessment data in CRM, enter reason for denial and open the denial letter template. Prepare the denial 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?

a) If No, place phone call to customer and send an application if requested.

b) If Yes, is picture on file and fee received?

1) If Yes, create and print ID card. Mail ID card with instructions to customer.

2) 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. Denial 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 denial.

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 denial information.

6. RTS staff representative present information to the appeals committee.

7. RTS Access resources on call.

8. Appeals meeting agenda:

a) Member introductions.

b) RTS justification presentation.

c) Customer response and documentation.

e) Committee questions.

d) Committee deliberations without RTS or customer presence.

f) Each committee member completes form with personal decision rationale.

g) Committee makes decision on eligibility.

h) Decision rationale is forwarded to the RTS ADA Coordinator.

9. 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.

10. RTS denial upheld?

a) If No, the application is approved.

b) If Yes, RTS writes a letter (CRM template) with the final decision to the customer.

End of Internal Process Maps (Flow Charts) for Eligibility Certifications and Appeals

End of Exhibit 10

EXHIBIT 11: SUMMARY OF PUBLIC COMMENTS

Following the comment period in 2017-10, the report of all public comments received during the RTS Access Paratransit Plan public hearing(s) and all proposed changes resulting from public comment shall be included in the plan in this exhibit. The comments shall go before the Board of Commissioners.

End of Exhibit 11

EXHIBIT 12: CERTIFICATIONS AND ASSURANCES

This exhibit contains the text from the pages of the FTA Fiscal Year 2017 Certifications and Assurances that are applicable to civil rights. This document is signed annually by the CEO and General Counsel and submitted to the Federal Transportation Administration.

# FTA FISCAL YEAR 2017 CERTIFICATIONS AND ASSURANCES PREFACE

Before the Federal Transit Administration (FTA or We) may award federal assistance for public transportation in the form of a federal grant, cooperative agreement, loan, line of credit, loan guarantee, master credit agreement, or State Infrastructure Bank (SIB) cooperative agreement certain pre-award Certifications and Assurances are required, except as FTA determines otherwise in writing. The Applicant must authorize a representative (Authorized Representative) to select and sign its Certifications and Assurances and bind the Applicant's compliance. You, as your Applicant's Authorized Representative, must select and sign all Certifications and Assurances that your Applicant must provide to support each application it submits to FTA for federal assistance during federal fiscal year (F19 2017. We request that you read each Certification and Assurance and select those that will apply to any application for which your Applicant might seek FTA assistance during FY 2017. As provided by federal laws, regulations, and requirements, FTA may award federal assistance only if the Applicant's Authorized Representative selects adequate Certifications and Assurances. We have consolidated our Certifications and Assurances into twenty-three (23) Categories. At a minimum, you must select the Assurances in Category 01. If your Applicant requests more than $100,000 in federal assistance, you must select the "Lobbying" Certification in Category 02, except if your Applicant is an Indian tribe, Indian organization, or an Indian tribal organization. Depending on the nature of your Applicant and the Award it seeks, you may also need to select one or more Certifications and Assurances in Categories 03 through 23. Instead of selecting individual Categories of Certifications and Assurances, however, you may make a single selection that will encompass all twenty-three (23) Categories of Certifications and Assurances that apply to our various programs. FTA, the Applicant, and the Applicant's Authorized Representative, understand and agree that not every provision of these twenty-three (23) Categories of Certifications and Assurances will apply to every Applicant or every Award or Project included in an Award, even if you make a single selection encompassing all twenty-three (23) Categories. Nor will every provision of each Certification or Assurance within a single Category apply if that provision does not apply to your Applicant or the Award it seeks. The type of Applicant and its application will determine which Certifications and Assurances apply. Your Applicant is ultimately responsible for compliance with the Certifications and Assurances selected that apply to its Award, itself any Sub recipient, or any other Third Party Participant in its Award, except as FTA determines otherwise in writing. For this reason, we strongly encourage your Applicant to take appropriate measures, including, but not limited to, obtaining sufficient documentation from each Sub recipient and any other Third Party Participant as necessary to assure your Applicant 's compliance with the applicable Certifications and Assurances selected on its behalf Except as FTA determines otherwise in writing, if your Applicant is a team, consortium, joint venture, or partnership, it understands and agrees that you must identify the activities that each member will perform and the extent to which each member will be responsible for compliance with the selected Certifications and Assurances. You also must identify each member's role in the Award, whether as a Recipient, Sub recipient, Third Party Contractor, or other Third Party Participant. It is important that you and your Applicant also understand that these Certifications and Assurances are pre-award requirements, generally imposed by federal or regulation, and do not include all federal requirements that may apply to it or its Award We expect you to submit your Applicant's FY 2017 Certifications and Assurances and its applications for federal assistance in FTA's electronic award and management system, currently the Transit Award Management System (TrAMS). You must be registered in TrAMS to submit your Applicant's F1' 2017 Certifications and Assurances. TrAMS contains fields for selecting among the twenty-three (23) Categories of Certifications and Assurances and a designated field for selecting all twenty-three (23) Categories of Certifications and Assurances. If FTA agrees that you are unable to submit your Applicant's FY 2017 Certifications and Assurances electronically, you must submit the Signature Pages at the end of this document, as FTA directs, marked to show the Categories of Certifications and Assurances that you are submitting. Be aware that these Certifications and Assurances have been prepared in light of The Fixing America's Surface Transportation (FAST) Act, Public Law No. 114-94, December 4, 2015, and other authorizing legislation to be enacted, and Appropriations Acts or Continuing Resolutions funding the U.S. Department of Transportation during Fiscal Year 2017.

## CATEGORY 01. REQUIRED CERTIFICATIONS AND ASSURANCES FOR EACH APPLICANT.

Before FTA may provide federal assistance for your Applicant's Award, you must select the Certifications and Assurances in Category 01 in addition to any other applicable Certifications and Assurances, except as FTA determines otherwise in writing. Any provision of the Certifications and Assurances in Category 01 that does not apply will not be enforced.

### 01.A. Certifications and Assurances of Authority of the Applicant and Its Authorized Representative.

You certify and affirm that in signing these Certifications, Assurances, and Agreements, both you, as your Applicant's Authorized Representative, and your Applicant's attorney who is authorized to represent your Applicant in legal matters, may undertake the following activities on your Applicant's behalf, in compliance with applicable state, local, or Indian tribal laws, regulations, and requirements and your Applicant's by-laws or internal rules:

1. Execute and file its application for federal assistance,

2. Execute and file its Certifications, Assurances, Charter Service Agreement, and School Bus Agreement, as applicable, binding its compliance,

3. Execute its Grant Agreement, Cooperative Agreement, Loan, Loan Guarantee, Line of Credit, Master Credit Agreement, or State Infrastructure Bank (SIB) Cooperative Agreement for which the Applicant is seeking federal assistance from FTA,

4. Comply with applicable federal laws, regulations, and requirements, and

5. Follow applicable federal guidance.

### 01.B. Standard Assurances.

On behalf of your Applicant, you assure that it understands and agrees to the following: I. It will comply with all applicable federal laws, regulations, and requirements in implementing its Award.

2. It is under a continuing obligation to comply with the terms and conditions of its Grant Agreement or Cooperative Agreement with FTA for each Award, including the FTA Master Agreement and other documents incorporated by reference and made part of its Grant Agreement or Cooperative Agreement, or latest amendment thereto.

3. It recognizes that federal laws, regulations, and requirements may be amended from time to time and those amendments may affect the implementation of its Award.

4. It understands that Presidential executive orders and federal guidance, including federal policies and program guidance, may be issued concerning matters affecting it or its Award.

5. It agrees that the most recent federal laws, regulations, requirements, and guidance will apply to its Award, except as FTA determines otherwise in writing.

6. Except as FTA determines otherwise in writing, it agrees that requirements for FTA programs may vary depending on the fiscal year for which the federal assistance for those programs was appropriated or made available.

### 01.C. Intergovernmental Review Assurance.

(This assurance in this Category 01. C does not apply to an Indian tribe, an Indian organization, or an Indian tribal organization that applies for federal assistance made available under

49 U.S.C. § 5311(c)(1), which authorizes FTA's Tribal Transit Programs.) As required by U.S. Department of Transportation (U.S. DOT) regulations, "Intergovernmental Review of Department of Transportation Programs and Activities," 49 CFR part 17, on behalf of your Applicant, you assure that it has submitted or will submit each application for federal assistance to the appropriate state and local agencies for intergovernmental review.

### 01.D. Nondiscrimination Assurance.

On behalf of your Applicant, you assure that:

1. It will comply with the following 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) on the basis of race, color, national origin, religion, sex, disability, or age including:

a. Federal transit laws, specifically 49 U.S.C. § 5332 (prohibiting discrimination on the basis of race, color, religion, national origin, sex (including gender identity), disability. age, employment, or business opportunity),

b. Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000d,

c. Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e et seq. (prohibiting discrimination on the basis of race, color, religion, sex, (including gender identity and sexual orientation) or national origin),

d. Executive Order No. 11246, "Equal Employment Opportunity" September 24, 1965, 42 U.S.C. § 2000e note, as amended by any later Executive Order that amends or supersedes it in part and is applicable to federal assistance programs,

e. Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. § 1681 et seq.,

f. U.S. DOT regulations, "Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance," 49 C.F.R. part 25,

g. The Rehabilitation Act of 1973, as amended, 29 U.S,C. § 794, et seq.,

h. The Americans with Disabilities Act of 1990, as amended, 42 U.S.C. § 12101 et seq.,

i. U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964," 49 CFR part 21,

j. U.S. DOT regulations, specifically 49 CFR parts 27, 37, 38, and 39, and

k. Any other applicable federal statutes that may be signed into law, federal regulations that may be issued, or federal requirements that may be imposed.

2. It will comply with federal guidance implementing federal nondiscrimination laws, regulations, or requirements, except as FTA determines otherwise in writing.

3. As required by 49 CFR § 21.7:

a. It will comply with 49 U.S.C. § 5332, 42 U.S.C. § 2000d, and 49 CFR part 21 in the manner that:

(1) It implements its Award,

(2) It undertakes property acquisitions, and

(3) It operates all parts of its facilities, as well as its facilities operated in connection with its Award.

b. This assurance applies to its Award and to all parts of its facilities, as well as its facilities used to implement its Award.

c. It will promptly take the necessary actions to carry out this assurance, including the following:

(1) Notifying the public that discrimination complaints about transportation-related services or benefits may be filed with U.S. DOT or FTA Headquarters Office of Civil Rights, and

(2) Submitting information about its compliance with these provisions to U.S. DOT or FTA upon their request.

d. If it transfers U.S. DOT or FTA assisted real property, structures, or improvements to another party, any deeds and instruments recording that transfer will contain a covenant running with the land assuring nondiscrimination:

(1) While the property is used for the purpose that the federal assistance is extended, or

(2) While the property is used for another purpose involving the provision of similar services or benefits.

e. The United States has a right to seek judicial enforcement of any matter arising under:

(1) Title VI of the Civil Rights Act, 42 U.S.C. § 2000d,

(2) U.S. DOT regulations, 49 CFR part 21, or

(3) This assurance.

f. It will make any changes in its Title VI implementing procedures, as U.S. DOT or FTA may request, to comply with:

(1) Title VI of the Civil Rights Act, 42 U.S.C. § 2000d,

(2) U.S. DOT regulations, 49 CFR part 21, and

(3) Federal transit law, 49 U.S.C. § 5332.

g. It will comply with applicable federal guidance issued to implement federal nondiscrimination requirements, except as FTA determines otherwise in writing.

h. It will extend the requirements of 49 U.S.C. § 5332, 42 U.S.C. § 2000d, and 49 CFR part 21 to each Third Party Participant, including any:

(1) Sub recipient,

(2) Transferee,

(3) Third Party Contractor or Subcontractor at any tier,

(4) Successor in Interest,

(5) Lessee, or

(6) Other Participant in its Award, except FTA and the Applicant (and later, the Recipient).

i. It will include adequate provisions to extend the requirements of 49 U.S.C. § 5332,

42 U.S.C. § 2000d, and 49 CFR part 21 to each third party agreement, including each:

(1) Sub agreement at any tier,

(2) Property transfer agreement,

(3) Third party contract or subcontract at any tier,

(4) Lease, or

(5) Participation agreement.

j. The assurances you have made on your Applicant's behalf remain in effect as long as FTA determines appropriate, including, for example, as long as:

(1) Federal assistance is provided for its Award,

(2) Its property acquired or improved with federal assistance is used for a purpose for which the federal assistance is extended, or for a purpose involving similar services or benefits,

(3) It retains ownership or possession of its property acquired or improved with federal assistance provided for its Award, or

(4) FTA may otherwise determine in writing.

4. As required by 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, and consistent with 49 U.S.C. § 5332, you assure that:

a. It will comply with the following prohibitions against discrimination on the basis of disability listed below in subsection 4.b of this Category 01.D Assurance, of which compliance is a condition of approval or extension of any FTA assistance awarded to:

(1) Construct any facility,

(2) Obtain any rolling stock or other equipment,

(3) Undertake studies,

(4) Conduct research, or

(5) Participate in any benefit or obtain any benefit from any FTA administered program.

b. In any program or activity receiving or benefiting from federal assistance that U.S. DOT administers, no qualified individual with a disability will, because of his or her disability, be:

(1) Excluded from participation,

(2) Denied benefits, or

(3) Otherwise subjected to discrimination.

01.E. Suspension and Debarment, Tax Liability, and Felony Convictions Certifications.

### 01.E.1 Suspension and Debarment.

On behalf of your Applicant, you certify that:

a. It will comply and facilitate compliance with U.S. DOT regulations, "Nonprocurement Suspension and Debarment," 2 CFR part 1200, which adopts and supplements the U.S. Office of Management and Budget (U.S. OMB) "Guidelines to Agencies on Government wide Debarment and Suspension (Nonprocurement)," 2 CFR part 180.

b. To the best of its knowledge and belief, that its Principals and Sub recipients at the first tier: (1) Are eligible to participate in covered transactions of any federal department or agency and are not presently:

(a) Debarred,

(b) Suspended,

Name of Applicant: Rochester Genesee Regional Transportation Authority

The Applicant agrees to comply with applicable provisions of the Categories it has selected:

01. Required Certifications and Assurances for Each Applicant. (Yes)

02. Lobbying. (Yes)

03. Procurement and Procurement Systems. (Yes)

04. Private Sector Protections. (Yes)

05. Rolling Stock Reviews and Bus Testing. (Yes)

06. Demand Responsive Service. (Yes)

07. Intelligent Transportation Systems. (Yes)

08. Interest and Financing Costs and Acquisition of Capital Assets by Lease. (Yes)

09. Transit Asset Management Plan, Public Transportation Safety Program, and State Safety Oversight Recommendations. (Yes)

10. Alcohol and Controlled Substances Testing. (Yes)

11. Fixed Guideway Capital Investment Grants Program (New Starts, Small Starts, and Core Capacity Improvement). (No)

12. State of Good Repair Program. (Yes)

13. Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs. (Yes)

14. Urbanized Area Formula Grants and Passenger Ferry Grant Program. (Yes)

15. Enhanced Mobility of Seniors and Individuals with Disabilities Programs. (Yes)

16. Rural Areas and Appalachian Development Programs. (Yes)

17. Tribal Transit Programs (Public Transportation on Indian Reservations Programs). (No)

18. State Safety Oversight Grant Program. (No)

19. Public Transportation Emergency Relief Program. (Yes)

20. Expedited Project Delivery Pilot Program. (Yes)

21. Infrastructure Finance Programs. (No)

22. Paul S. Sarbanes Transit in Parks Program. (No)

23. Construction Hiring Preferences. (Yes)

FEDERAL FISCAL YEAR 2017 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

Required of all Applicants for federal assistance to be awarded by FTA and all FTA Grantees with an active Capital or Formula Award)

AFFIRMATION OF APPLICANT

Name of the Applicant: Rochester Genesee Regional Transportation Authority

Name and Relationship of the Authorized Representative: William C. Carpenter, CEO of RGRTA

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2017, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it. FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2017. The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 et seq., and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature

Name: William C. Carpenter (Authorized Representative of Applicant)

Date: 12-22-16

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Rochester Genesee Regional Transportation Authority

As the undersigned Attorney for the above named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it. I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature

Name: Dan DeLaus (Attorney for Applicant)

Date: 12-21-16

Each Applicant for federal assistance to be awarded by FTA and each FTA Recipient with an active Capital or Formula Project or Award must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within FTA's electronic award and management system, provided the Applicant has on file and uploaded to FTA's electronic award and management system this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.

End of Exhibit 12

EXHIBIT 13: MPO CERTIFICATION

This exhibit will contain the Metropolitan Planning Organization certification when it is completed and retained in the final version of the Paratransit Plan. The MPO for RTS is the Genesee Transportation Council. The MPO review shall be completed following the public participation and comment period.

End of Exhibit 13

EXHIBIT 14: RATIFIED BOARD RESOLUTION

Following proposal and presentation to the Board of Commissioners, the ratified resolution for the approved the RTS Access Paratransit Plan shall be included in the Plan in this exhibit. The Plan will go before the Board after conclusion of public participation and the completion of any subsequent revisions as result of public comments.

End of Exhibit 14

End of Exhibits to the Paratransit Plan

End of the Proposed Exhibits of the RTS Access ADA Paratransit Plan, 2017-18