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## REQUEST FOR PROPOSALS

Consolidated Transportation Services Agency (CTSA) Support  
Services for Redwood Coast Transit Authority

November 15, 2019

A handwritten signature in blue ink that reads 'Joseph Rye'. The signature is fluid and cursive, with the first name 'Joseph' being larger and more prominent than the last name 'Rye'.

Joseph Rye  
General Manager  
Redwood Coast Transit Authority

## 1. BACKGROUND

**THE REGION:** The region served by the Redwood Coast Transit Authority features the populated portions of Del Norte County, plus small communities in Northern Humboldt County. Del Norte County is California's northernmost coastal county, with a land area of approximately 1,070 square miles. The County is bounded by Curry County, Oregon, to the north, mountainous Siskiyou County to the east, Humboldt County to the south, and by the Pacific Ocean to the west. Crescent City, the county seat, is located roughly halfway between Portland, Oregon (330 miles north) and San Francisco, California, (350 miles south). Regionally, Crescent City is located approximately 85 miles north of Eureka, Humboldt County, about 26 miles south of Brookings, Oregon and 83 miles west of Grants Pass, Oregon and Interstate 5.

The principal north-south route through Del Norte County is US Highway 101 (or Highway 101), which provides access to coastal towns and cities to the north and south. Crescent City is located on US Highway 101. Del Norte County has two main routes providing access to inland communities: State Route, or SR 197/US Highway 199 to Hiouchi and Gasquet, and Route 169 to Klamath Glen. SR 197/US Highway 199 connects US Highway 101 to the Interstate 5 in Oregon.

The county's diverse geography includes inland mountain ranges of coniferous forests, low coastal mountain ranges with temperate forests and the Redwood State and National Parks, and rugged coastlines with gray sand beaches on the Pacific coast. The climate of Del Norte County is consistently mild along the coast, becoming more variable inland. In Crescent City and along the coastal fringe, there is minimal temperature fluctuation. Coastal daytime temperatures average 45-55 degrees during winter months. Temperatures increase to 55-65 degrees during mid summer and early fall months, with higher temperatures when coastal fog disperses. Inland, temperatures differences are more marked. Del Norte County/Crescent City area's annual rainfall generally ranges between 70 - 80 inches, with the heaviest rainfall occurring from November through March. Weather plays a factor in transit operations in winter.

**POPULATION:** The California Department of Finance estimated the Del Norte County population at 27,124 as of 2017. This includes a population of 20,735 within the unincorporated area of the County and 6,389 within the City of Crescent City. This shows a significant population migration from within the City into the unincorporated areas in recent years.

### **ORGANIZATION AND MANAGEMENT:**

Redwood Coast Transit Authority (RCTA) was formed in June 2004 to provide public transit services in Del Norte County. The City of Crescent City and the County of Del Norte each appoint two members of their governing boards to the RCTA Board of Directors. These members appoint one additional at-large member. The Board of Directors makes all policy decisions regarding the transit system. RCTA has no employees per se. RCTA contracts for its management with a consultant team featuring over 50 years transit management experience. For operations and maintenance, RCTA

also contracts with a private contractor, First Transit, Inc., to oversee and conduct day-to-day operations and maintenance. Operations and Maintenance are performed by First Transit at a RCTA-owned facility at 140 Williams Drive in Crescent City.

Redwood Coast Transit Authority (RCTA) is governed by a five-member Board of Directors, comprised of two members of the County Board of Supervisors and two City of Crescent City Councilmembers, plus one at large appointed position. The RCTA is managed by a part-time contract with two veteran transit staff persons (Joe Rye and Dan Herron) and all operations and maintenance are contracted out (First Transit is the current contractor, and has held the contract for many years). The Del Norte Local Transportation Commission (DNLTC) is the Regional Transportation Planning Agency (RTPA) for the Del Norte County region and the funding agency providing funding for this SRTP/TDP Update.

First Transit is the operations and maintenance contractor for Redwood Coast Transit Authority and provides almost all the system's personnel and features a full-time local General Manager (Chuck Clarkson) who is a key manager on-site in Crescent City. The RCTA Operations and Maintenance Facility is open to the public and staffed 6 days per week during most all hours of operation.

## **HISTORY OF REDWOOD COAST TRANSIT AUTHORITY AND DESIGNATION AS DEL NORTE COUNTY'S CTSA IN 2018:**

DNLTC named RCTA as the County's official Consolidated Transportation Services Agency (CTSA) in 2018. RCTA has been planning and developing the initial CTSA programs since 2018, with a chapter in the 2019 Short Range Transit Plan dedicated to recommending a model for delivering the (2) two initial CTSA programs:

ADA Eligibility Determination Program (clerical support in the scope of this RFP)  
Transit Travel Training Program (program admin and delivery in the scope of this RFP)

See 2019 SRTP Chapter X, CTSA Program, Exhibit A in this RFP for project details.

## **2. PROJECT DESCRIPTION**

The Redwood Coast Transit Authority is soliciting proposals from qualified firms to provide CTSA support duties, as outlined and prescribed in Exhibit A for a time period of two years, from January 1, 2020 to December 31, 2021. The CTSA will likely continue beyond 2021 but these duties may be rolled into RCTA's contract for Operations and Maintenance services effective January 1, 2022.

**PROJECT GOALS AND OBJECTIVES:** The overall goal of this project is to obtain services to lead and administer the RCTA Transit Travel Training Program and provide clerical support duties to the ADA Eligibility Determination Program (led by RCTA administrative staff). Proposing firm must have a local presence, including an office to receive walk-in clients for taking photographs, making of ID cards, and providing

general information, and a staffed phone to answer telephone inquiries during all business hours.

**TRAVEL TRAINING PROGRAM DEVELOPMENT:** Expectations are that the Proposer will take the lead on administration of the Transit Travel Training Program. This will include dedicating staff time to initiating group and individual travel training events, training and scheduling of travel trainers who have expert knowledge of RCTA system and policies, and all reporting required to meet funding partners and RCTA requirements. See Exhibit A for additional details on Travel Training Program expectations.

**ADA Eligibility Determination Clerical Support:** RCTA Administration will take the lead on this program, and make the actual determinations, but Proposer will be responsible for providing the critical “on the ground” presence and clerical support required due to RCTA Administration being located remotely. RCTA will provide GetGoing Software, which is a custom package that supports both ADA Eligibility and the Travel Training programs. Proposer will provide a location in Crescent City, accessible easily by car, foot, and public transit, where applicants for ADA Services (including fixed route “half-fare”) will visit to obtain information, submit paper applications, be processed and photographed, and issued ID Cards. Proposer will also produce and mail various official ADA Eligibility Program determination letters to applicants, and field phone and email inquiries about the program.

### 3. SUBMITTAL PROCEDURES

One electronic copy of your proposal should be sent to Joseph Rye, General Manager, Redwood Coast Transit Authority at [tmticonsulting@gmail.com](mailto:tmticonsulting@gmail.com). The electronic copy must be unlocked to facilitate inclusion in agenda packets and emailed by proposal deadline to [tmticonsulting@gmail.com](mailto:tmticonsulting@gmail.com). Proposals shall be received (electronically via email ONLY) no later than 5:00 p.m. on November 29, 2019. Proposals received later than that time will not be considered. Proposals must not exceed 30 pages, brevity is required.

### 4. PROPOSAL CONTENT

Your proposal shall be evaluated using the four criteria sections described below:

**EXPERIENCE AND QUALIFICATIONS:** In order to provide RCTA with the best possible expertise, proposals may be submitted by a firm with the ability to establish a local staffed facility. This is due to the erratic scheduling nature of the Transit Travel Training Program. RCTA seeks a firm with an existing and strong local presence where the public can reach the Proposer through a local telephone number or stopping by a physical office location during normal business hours (M-F 9am-4pm, at a minimum).

Your proposal should contain a detailed resume for the Travel Training Program Manager. The experience of the firm in conducting similar CTSA support or public transit operations/support duties is very important.

**SCOPE OF WORK:** Exhibit A and this RFP combine to define the ultimate product of this project, the CTSA Support Duties. Your proposal must define, in detail, your method for arriving at that final product, and will be scored as to how closely it follows the RCTA SRTP CTSA Chapter model recommendations and is advantageous to RCTA.

**SCHEDULE:** RCTA's CTSA Programs launch on January 1, 2020. Your proposal should define a schedule for each task, including any training needed to become ready to deliver the programs by the January 1, 2020 launch date.

**COSTS:** The contractor will be responsible for providing all clerical support staff work, printing, postage, telephone, administration, including program management and staffing of travel training events and individual travel training sessions. RCTA staff will oversee both CTSA programs, taking a lead role in the ADA Eligibility Determination Program, and a supporting role in the Transit Travel Training Program. Proposer will provide postage for ADA Eligibility mailings. RCTA averages about 5-6 new ADA Applicants per month, but the current RCTA database of clients using Dial-A-Ride numbers approximately 150 and those will be required to undergo the ADA Eligibility Determination process in 2021, adding to the workload. In addition, RCTA will be requiring proof of disability for its fixed route riders to claim "half-fare" starting in 2020. The "Half-Fare" application will be simpler, but will still require applicants to visit the Proposer's facility and be processed and photographed.

## 5. SELECTION

Proposals will be reviewed by RCTA staff and will be ranked according to the following criteria:

- 35% Experience/Qualifications of Proposer Firm and Specific Local Staff
- 35% Understanding of Project, including strong existing local staff and local office from which to operate the Travel Training Program and support the ADA Eligibility Determination Program, and ability to meet all program needs as described in detail in Exhibit A (2019 RCTA CTSA Chapter) including Approach, Methodology, Innovative Analysis, quality and clarity of the detailed Scope of Work.
- 25% Cost.
- 5% Implementation Schedule including Staff Training

RCTA reserves the right to reject any or all proposals, to waive any irregularities in proposals, and to negotiate scope and price with one or more proposers. RCTA will notify the successful proposer by December 16, 2019, or as soon as possible thereafter. Unsuccessful proposers will be notified as soon as practical after selection.

**6. PROPOSED PROJECT SCHEDULE – SUBJECT TO CHANGE**

- |    |                    |  |
|----|--------------------|--|
| A. | November 15, 2019  | RFP issued   |
| B. | November 22, 2019  | Last day for submission of questions   |
| C. | November 25, 2019  | Issuance of addenda, if any  |
| D. | November 29, 2019  | Proposal submittal due date and time<br>5:00 p.m. California time – e-mail submittals<br>required by due date and time, electronic submittals ONLY |
| E. | December 2-6, 2019 | Proposer phone interviews, if required   |
| F. | December 16, 2019  | RCTA Board of Directors awards contract  |
| G. | January 1, 2020    | Commence service/Contract Begins   |
| H. | December 31, 2021  | End of Contract  |

# Exhibit A -Chapter 5: RCTA Consolidated Transportation Services Agency Implementation Planning

## BACKGROUND

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### CTSAs & Mobility Management

A Consolidated Transportation Service Agency (CTSA) is an organization or agency that provides coordination transportation services, public information about an array of transportation options, and technical assistance to community and specialized transportation providers, especially for the benefit of human service clients including the elderly, people with disabilities, and people with low income.

The designation of CTSAs in each of California's counties were made possible by the 1979 California Social Service Transportation Improvement Act (AB 120). This Act sought to facilitate coordination of social service transportation services, which were often inefficient and duplicative. The Del Norte County Local Transportation Commission has the authority to designate the CTSA for the County. CTSA's are eligible to receive up to 5% of their county's Transportation Development Act (TDA) funds each fiscal year. This is expected to equal approximately \$25,000 to \$30,000 per year, based on recent years.

### History of CTSA programs in Del Norte County

The programs and organizations designated as the CTSA, and consequent recipients of the CTSA funds, for Del Norte County have varied over the past few years. The two most recently designated CTSAs and their programs are described below.

#### **Del Norte Association for Developmental Services**

The Del Norte Association for Developmental Services (DNADS), a County nonprofit, was the CTSA from approximately 2007 to 2011. During this period, they used the CTSA funding for a non-emergency medical transportation (NEMT)

program. This service transported people from Crescent City to Humboldt County for medical appointments two days a week. They also provided transportation to and from the Del Norte County Senior Center lunch program five days a week. Ultimately, these services became infeasible due to the costs exceeding the funds provided by the CTSA designation and the programs were discontinued.

### **Sutter Coast Hospital**

The most recent designee and recipient of CTSA funds was Sutter Coast Hospital. The CTSA funds were intended to fund a pilot Patient Repatriation Program to return people who were medic-flown out of the community. During the first year Sutter Coast Hospital did not expend any of the funds because no one requested assistance from the program, despite the Hospital's efforts to provide information about the availability of the service. Sutter Coast Hospital returned all of the designated CTSA funds intended for fiscal year 2017/18 to the Del Norte County Local Transportation Commission.

## **RCTA's Role as the CTSA & Funding**

The Del Norte County Transportation Commission (DNLTC) invited the RCTA to take the role of the County's CTSA. If TDA funds (0-5%) are not programmed to a CTSA, they are programmed to RCTA, since RCTA is the only public transit agency in the County eligible to receive TDA funds. By obtaining the CTSA designation, RCTA secures funding that has historically been allocated to other organizations in the County. The full 5% of TDA funds that could be designated to the CTSA in fiscal year 2019/20 is approximately \$25,000 - \$30,000.

In May 2018, the RCTA Board of Directors approved Resolution 2017-18-12, accepting the designation from the DNLTC as the County's CTSA. The general idea at the time that the Resolution was adopted was that RCTA would use the CTSA funds to develop and implement a sustainable ADA eligibility determination program and a complementary transit travel training program.

These two programs are very common CTSA functions across the State but are approached differently in each CTSA based on unique local situations. In Del Norte County these two programs are likely to be the most feasible among the variety of CTSA activities given the rural nature of the County, limited amount of



funding, and the chosen remote part time managerial model. In addition, travel training programs work well when deployed with ADA Eligibility Determination, as the determination of both eligibility and non-eligibility is a good source of travel trainees. This Chapter explores implementation options and considerations for these two programs. Other potential CTSA programs are described in a separate section below.

## TRAVEL TRAINING

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The overall goal of a travel training program is to increase the level of mobility of a community by teaching people to travel safely and independently on fixed-route public transit.

### The Need

Using public transit for the first time, or even just trying out a new system for the first time, can be intimidating. Travel training can be especially helpful for older adults and people with disabilities. The current generation that is aging to the point of having increased difficulty driving safely is largely unfamiliar with using public transportation, due to having grown up with ubiquitous single car ownership. For people with disabilities, training on the use of public transit can offer independence and access to services.

The Social Service Transportation Advisory Council (SSTAC) is a council appointed by Del Norte Local Transportation Commission (DNLTC) to represent seniors, people with disabilities, and persons of limited means regarding transit matters. The members include representatives of various aspects of social service transportation. The SSTAC holds an annual public forum to identify and prioritize a list of unmet transit needs. For the last three years, travel training was

For the last three years, travel training was identified as the second most important unmet need in the County.

identified by the Council as the second most important unmet need in the County.<sup>1</sup> One SSTAC member noted:

*There are people living in the senior living communities who can see transit stops down the street, but they don't know how to use it. You can go all the way from Crescent City to Brookings and Medford on transit, but most people don't know this.<sup>2</sup>*

The intended outcome of an RCTA travel training program is to enable more people to get where they need to go by providing assistance in learning how to plan and take trips on Redwood Coast Transit. Travel training programs and activities can take a variety of forms. Various options and considerations are described below for delivery of a travel training program by RCTA as the County's CTSA.

## Aspects of a Travel Training Program

A travel training program teaches individuals and/or groups how to read bus schedules, plan trips, understand how to pay fares, transfer between routes, and generally navigate the County safely via the bus system. The level of in-person hands on training, number of training sessions, and size of group trainings can all vary, depending on the program and needs of the community. Some travel training can be done online and through printed media, an option which is explored below.

### Trainee Recruitment & Levels of Training

One option is to provide travel training one-on-one. This can be done in either an indoor setting or by taking a trip on the bus, or a combination of both. One-on-one training can be offered as a one-time session, or a series of sessions for those needing a higher level of guidance. The target audience for RCTA's program should need an average of two travel training sessions to ride independently.

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<sup>1</sup> Non-Emergency Medical Transportation was number one and is in a separate section.

<sup>2</sup> Paraphrased

Individual trainees can be recruited through the ADA paratransit eligibility process, whether they are deemed eligible or not. Many people that apply for paratransit can learn to use fixed route with some training and support, and often end up using a mix of paratransit and fixed route, depending on the destination, health, weather, etc. This saves both parties money<sup>3</sup> and gives the student greater freedom and mobility independence. Referrals for travel training can also come from outside sources such as the department of motor vehicles and community organizations providing social services, such as the Open Door Community Health Center, Del Norte Association for Developmental Services, True North Organizing Network, Del Norte Senior Center, Rural Human Services, and Our Daily Bread Food Bank, among others.

Travel training people in groups is also an option, and can be done in a classroom setting, by taking a group “field trip” on a regularly scheduled bus, or a combination of both. The length of group training can vary, generally between a couple hours and a full day (with breaks). Trainee groups can be recruited through direct marketing of the travel training program at senior centers, senior living apartments, schools, and other community organizations.

### **Follow up and Evaluation**

Success can be measured by how many students become bus riders, how frequently they ride, and an estimate of how much overall ridership grows as a result. A good way to determine this is to conduct short phone interviews with trainees three to six months after their training. The interview questions should include, at a minimum:

- Whether they found the training useful/helpful
- If they are still using the bus, and if yes, how often and for which trips
- How they were getting around before and if the bus replaced any of these trips
- If the training changed the way they view transit
- If the training impacted their quality of life
- Suggestions for improvement for the training and/or the bus system

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<sup>3</sup> The passenger fare for riding fixed-route transit is lower than the Dial-a-Ride fare and the average cost for RCTA to provide a fixed-route trip is lower than a Dial-a-Ride trip.

These questions will help to determine how effective the program is at improving mobility for the community, increasing ridership on transit, reducing costs for RCTA (e.g., if someone was using Dial-a-Ride and switched to using fixed-route), and reducing vehicle miles traveled.

## Implementation Considerations

This section explores various options for delivery of travel training services by or through RCTA. In their role as the CTSA, the RCTA General Managers will be responsible for management of the program, regardless of the entity that delivers the in-person travel training. The Del Norte Association for Developmental Services (DNADS) previously operated a travel training program targeted towards people with disabilities and has offered their services as advisors to program development.

### Train the Trainer Training

There are no official requirements for training for travel trainers, but whomever is delivering the travel training should undergo at least a basic level of training on how to be an effective travel trainer. Travel training involves other aspects of mobility, beyond riding the bus. Pedestrian access to/from the bus stop and the challenges that the trainees may face are important considerations for travel training.

Training on how to be a travel trainer is called “train the trainer” training. There are various options for obtaining train the trainer services. The Easter Seals Project Action (ESPA) offers a travel trainer certification that requires 60 hours of training, both in-person and online. The program is comprehensive and aimed at those who will be training people of all abilities, including those with severe disabilities that would require several sessions of hands on training. This option is cost prohibitive and unnecessary, given the target trainees of the RCTA program.

A more cost effective option may be to enlist a service that provides one- or two-day train the trainer trainings on site. One instructor is available for approximately \$600 per day, plus travel costs. This instructor previously provided train the trainer services for the Del Norte Association for Developmental

Services program and is familiar with the County. Regardless, training is a key element of the startup success of the program.

### **Managing Trainees & Progress**

Trainees and their progress will need to be managed and tracked. Several model travel training programs use travel training databases. While a database system is not necessary for operating a travel training program, it can certainly help with program management and measuring trainees' progress.

The benefits of using travel training database software include, but are not limited to:

- Comprehensive trainee record management
- Built in checklists and guidance for travel training
- Referral tracking and management
- Communication with training tracking
- Outreach activity tracking
- Automated reports
- Integrated waiver and pre-training interview notes
- Informational videos on how to travel train
- Integration with other transit performance tracking systems
- Customization for agency-specific needs

Another benefit to using a travel training database is combined customer management with ADA eligibility. This enables the travel training administrator to view and manage both travel trainees and those who have gone, or are going through, the ADA eligibility process through a single and integrated platform. Furthermore, as previously mentioned, the ADA eligibility process can be an effective means of identifying potential trainees.

One database vendor (GetGoing Software, by Jigsaw) is cost effective and contains all the features described above. The software can be managed through a desktop computer and travel trainers can use a mobile tablet to enter information, including trainee skills and photos, during training in the field. RCTA has purchased this software for CTSA program usage.

## **Pre-Trip Interview and Liability Waiver**

A best practice for travel training programs is to conduct a brief interview with potential trainees to learn about their goals for being travel trained, contact information, medical conditions, and current mobility habits. This can be done in person or over the phone.

An essential best practice is to have the trainee sign a waiver prior to travel training that expresses consent and authorization. A sample waiver and pre-trip interview form are provided in Appendix A. This waiver can be integrated into the recommended database software and signed electronically by the trainee on the mobile tablet.

## **Overarching Tasks**

Overarching tasks to operate the program would include, but need not be limited to:

1. Outreach and coordination with various organizations to advertise the availability and benefits of the program and establish a communication channel for referrals
2. Marketing the program to the public (announcements on the website and social media, creating and distributing fliers, etc.)
3. Procuring and receiving "train the trainer" training for travel trainers
4. Managing a database of trainees, including taking in referrals, scheduling trainings, and their progress
5. Conducting individual and group travel trainings in-person
6. Conducting follow up interviews

Costs for tasks 1 and 2 are largely dependent on the level of effort that is able to be devoted to outreach and marketing. Costs for task 3, aside from the fixed costs of procuring the training, are dependent on the number of trainers being trained. Costs for tasks 4 to 6 are dependent on the number and length of in-person training sessions.

## **Local Partnership**

A logical option is to split the responsibilities between the RCTA General Managers and a local partner, such as a contractor or volunteer. A travel training program will work best if a local person(s), intimately familiar with the

area and Redwood Coast Transit, can take on the task of delivering the training. The limited available funding for this program, at present, necessitates that a designated travel trainer (person who delivers the training) work only part time.

## **Media-based Travel Training**

There are media-based methods for delivering travel training information that can complement in-person travel training.

### **Instructional Videos**

Some people have trouble reading a transit schedule and/or other written materials. Short videos are a good tool for teaching the basics about how to ride the bus, including boarding the bus, paying a fare, using a wheelchair lift, and riding with a bicycle. Videos can be produced relatively easily and inexpensively. They can be hosted online for free and are easily disseminated through email, websites, and social media. They can also be used as part of an in-person travel training session.

### **Pamphlets and Guides**

Printed guides are also helpful for disseminating detailed information about the basics of riding the bus. They can range from tri-fold pamphlets that explain one or two topics to a comprehensive guide that covers a range of topics. Print materials should have large fonts, uncomplicated language, and images to make them accessible and inviting. Printed materials are very a helpful complement to in-person travel training, because they are a visual aid and enable the trainee to look back on what they learned.

These documents can be offered online in pdf format so that people can view them on their computer, use a screen reader (for the visually impaired) to read them, and print them at home. Electronic documents for print can be produced inexpensively with labor as the only cost. The cost of printing depends on the type of document and quantity. The lowest cost option would be to print electronic documents with a regular in-house printer as needed.

## **RCTA Website & App**

A section devoted to educating people on how to ride the bus could be added to the existing RCTA website. This section could include information about the in-person travel training program, pdf pamphlets and guides, and/or instructional videos.

Travel training information could be incorporated into the mobile application currently under development by RCTA. The app will give users real-time information about bus arrivals. In addition, the app could include information about the travel training program, downloadable guides, links to instructional videos, or simply a link to the RCTA website

## **Recommended Travel Training Program Options**

The following recommendations were developed by consultant staff in coordination with RCTA general management.

- RCTA General Managers should be responsible for oversight of the program, marketing the program to the general public, and coordination with local agencies.
- A local entity or an entity with resources to staff a local office for a project of this small size, should manage the daily functions, including: intake referrals, calls, and emails from potential trainees.
- Purchase GetGoing combined Travel Training and ADA Eligibility database software and preferably a mobile tablet hardware should be procured and utilized to manage trainees and outreach activities.
- Travel trainers should receive “Train the Trainer” training to better enable them to understand and assist trainees regarding specific mobility challenges, including path of travel to bus stop considerations.



# ADA PARATRANSIT CERTIFICATION PROCESS

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## Purpose and Scope

One of the first projects of the new CTSA is to provide Americans with Disabilities Act (ADA) Complementary Paratransit eligibility determination and certification. Recommendations are made based on what is most likely to be both sustainable and successful considering the remote location that RCTA operates in, which limits contracting opportunities, among other constraints.

## ADA Regulations for Determining Complementary Paratransit Eligibility

ADA regulations are complex. The following provides an overview of the ADA regulations requirements for determining ADA eligibility determination.<sup>4</sup>

Section 223 of the Americans with Disabilities Act of 1990 (ADA) requires public entities that operate non-commuter fixed-route transportation services to also provide complementary paratransit service for people with disabilities who are unable to use the fixed route system. The regulations issued by the U.S. Department of Transportation (DOT), which implement this portion of the law, specify to whom and under what circumstances this service is to be provided. In addition, the regulations require public entities that are subject to the complementary paratransit requirements to develop and administer a process for determining if people who request service meet the regulatory criteria for eligibility.

Complementary paratransit service is to be provided to people determined to be ADA paratransit eligible when they are unable to use the fixed-route service to meet particular trip needs. As described below, the regulations provide

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<sup>4</sup> Much of this overview section of ADA Eligibility Determination has been adapted from "Determining ADA Eligibility, An Approach Recommendations and Training Materials, prepared for Easter Seals Project Actions by TransSystems and ACCESS Transportation Systems, Updated 2014.

detailed guidelines which define who is to be considered ADA paratransit eligible and what trips are to be considered eligible.

All public entities such as RCTA which operate complementary paratransit services must establish a process for certifying individuals as ADA paratransit eligible. Requests for certification must be accepted from individuals, regardless of their place of residence. Certification cannot be limited to residents in RCTA's jurisdiction. An eligibility determination process must be established even if the public entity operates a paratransit system with broader eligibility requirements than the ADA. Specifically, RCTA currently has a general public dial-a-ride program that it uses to meet ADA paratransit requirements. All potentially ADA paratransit eligible people may be covered by the general public dial-a-ride service, but individuals must still have the opportunity to apply for and receive documentation of ADA paratransit eligibility which can be used in other cities when they travel.

RCTA goes beyond what is required by ADA in allowing the general public to ride dial-a-ride services. Seniors 65 and older without a disability are able to ride Dial-A-Ride for \$1.75. The general public can ride Dial-A-Ride for \$5.00 per trip.

### **Need for Public Involvement in Eligibility Process Design**

The development of a new ADA eligibility determination process must include public involvement. ADA regulations require that any changes to the ADA eligibility determination process be made with the input and support of the community, especially persons with disabilities (49 CFR Part 37, 37.137(c)). Options for providing a public involvement process for ADA eligibility determination is discussed later in this chapter.

### **Three Categories of Eligibility**

The regulations describe three specific circumstances under which a person would be considered ADA paratransit eligible. Within the industry, these have been referred to as the three "categories" of eligibility. The regulations also require that service be provided to attendants and companions of eligible individuals and to visitors from outside a transit district's jurisdiction.

There are three categories for ADA eligibility:

“(1) Any individual with a disability who is unable, as the result of a physical or mental impairment (including a vision impairment), and without the assistance of another individual (except the operator of a wheelchair lift or other boarding assistance device), to board, ride, or disembark from any vehicle on the system which is readily accessible to, and usable by, individuals with disabilities.

(2) Any individual with a disability who needs the assistance of a wheelchair lift or other boarding assistance device and is able, with such assistance, to board, ride and disembark from any vehicle which is readily accessible to and usable by individuals with disabilities. If the individual wants to travel on a route on the system during the hours of operation of the system at a time, or within a reasonable period of such time, when such a vehicle is not being used to provide designated public transportation on the route.

(3) Any individual with a disability who has a specific impairment-related condition which prevents such individual from traveling to a boarding location or from a disembarking location on such system.”

As a practical matter, eligibility criteria #2 is not applicable, as all RCTA buses are all wheelchair accessible and comply with ADA regulations.

For the first category, the ADA eligibility determination is such that the person has a cognitive, vision, or physical disability that doesn't enable the person to “navigate” boarding, paying a fare, or riding the bus. It is important to note that eligibility is based on current, actual functional ability to independently ride the bus and not future potential. A person, for example, with cognitive disability could learn with travel training to navigate and board the bus. However, travel training is voluntary, and the eligibility determination must be made on their existing functional ability. A person may be able to navigate a transit bus with an assistant, but the eligibility determination must be made on the person's independent functional capability for navigating boarding and riding the bus.

The third category is such that a disability prevents a person from travelling to and from a bus stop. The rural nature of the RCTA service area includes many streets that lack sidewalks, curb cuts, and many bus stops are non-compliant with ADA regulations. In addition, inclement weather and drainage issues can prevent some passengers from accessing the bus stop. It is important to note

that Appendix D of the ADA regulation specifically states that the disability and environmental conditions combined must prevent the person from travelling to and from a bus stop. If the condition makes it more difficult but there is a reasonable path of access to the bus stop, then that condition doesn't confer eligibility. Given the judgment required to determine if travel is truly prevented and the relationship between environmental conditions and an individual's disability, making eligibility determinations based on this third regulatory category is likely to be the most difficult.

### **Determining Eligibility Based on the Most Limiting Factors**

Determinations of ADA paratransit eligibility must consider the ability of applicants to travel to **any** origins and destinations in the paratransit service area under **all** possible conditions. Determinations cannot be based on a person's ability to use fixed-route service some of the time, or under "typical" conditions. For example, a person with an ambulatory disability may live only one block from the nearest bus stop and the path-of-travel between her home and the stop may be accessible. She may not, though, be able to independently travel more than 1/2 mile and may not be able to negotiate steep terrain, or other inaccessible paths-of-travel.

Because eligibility is being granted for travel for several years, the decision should not be based on specific trips that she may or may not be able to take by fixed route, but on whether she can travel throughout the ADA paratransit service area under all types of conditions.

### **Three Types of Eligibility**

There are three types of eligibility under ADA regulations:

- People who cannot be expected to use the fixed-route service under any circumstances are *unconditionally eligible*.
- People who can use fixed-route service in certain circumstances are *conditionally eligible* and the conditions under which they can use fixed-route should be determined.
- Persons with temporary disabilities are to be considered for ADA paratransit eligibility. Examples include:

- someone with a medical condition such as a broken leg who temporarily is unable to use the fixed-route service
- someone who has recently undergone an operation or other medical treatment and who is unable to use the fixed-route service

Many rural transit systems do not have the resources to provide trip by trip eligibility and often grant unconditional eligibility. This is typically due to two factors. First, it is more expensive to develop an in-person assessment process to determine conditional eligibility. Second, the rural nature of counties like Del Norte County often require additional financial resources to transport ADA Paratransit applicants to an on-site facility for in person assessment. Whether or not conditional eligibility is grant should be part of the CTSA public participation process in determining ADA eligibility determinations.

### **Personal Attendants and Companions**

Paratransit service also must be provided to a personal attendant (aka personal care attendant, or PCA) traveling with an eligible rider. In addition to an attendant, the regulations require that service be provided to one companion accompanying an eligible rider. Other companions accompanying the rider are to be accommodated on a “space available” basis. A person is considered to be accompanying the eligible rider if he or she is picked up and dropped off at the same locations as the eligible rider. Companions may be charged the same fare as the eligible rider and attendants must ride free.

### **Visitors**

The needs of visitors with disabilities who cannot use the fixed-route system also are addressed in the regulations. Complementary paratransit service must be provided to ADA eligible people who travel to areas outside of the region in which they live. If these people have been certified as “ADA paratransit eligible” by a public entity, that certification must be honored, and the host transit agency must provide up to 21 days of paratransit service. Because Del Norte county resident who are ADA Eligible do not receive an ADA paratransit eligible card, when they travel outside of Del Norte County, they do not have the necessary documentation for visitor status on other transit systems for a ADA Paratransit trip.

## Other Important ADA Eligibility Determination Requirements

- ADA complementary paratransit regulations require that the “eligibility process strictly limit” ADA eligibility to those who are eligible under the eligibility standards described above.
- ADA complementary paratransit regulations require that an eligibility determination be made within 21 days of the application submittal.
- ADA complementary paratransit regulations allow Del Norte County to “establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit to ADA eligible individuals who establish a pattern or practice of missing scheduled trips.” It is important that applicable due process be provided as the provision of ADA Complementary Paratransit eligibility is a civil right.
- ADA complementary paratransit regulations require an appeals process if an application is denied.
- If an individual wants the application process in accessible formats, it needs to be provided.

## CTSA Organizational Options

### Hybrid Approach of operation and maintenance contract and management contractor.

In this organizational structure, the ADA Paratransit eligibility determination functions would be divided between a local entity with robust staffing and a facility open to the public during business hours, such as the RCTA operation and maintenance contractor (currently First Transit and hereinafter referred to as First Transit) and the management contractor (currently Herron/TMTP).

**Option 3A: Local Entity, likely RCTA Operations Contractor, provides all clerical ADA Paratransit eligibility determination process functions and Herron/TMTP would make the actual ADA Paratransit eligibility determinations.**

The first hybrid model is where RCTA's Operations Contractor (or another local entity with staffing and a local office open daily) handles all clerical duties of ADA Paratransit eligibility determination process. In this hybrid model, RCTA's Operations Contractor would provide the information and fulfillment function of handling phone calls, and requests for information. The Operations Contractor

would send out and receive paper ADA Paratransit applications and enter them into the software database system. Herron/TMTP would review the applications electronically and determine if professional verification is required of the applicant. If required, the Operations Contractor would work with the applicant to complete the professional verification and input all data into a database software tool. Utilizing the software tool, Herron/TMTP would make the ADA Paratransit eligibility determination and utilize the software to notify First Transit to send out the ADA Paratransit eligibility determination letters. If the ADA Paratransit application is approved, the Operations Contractor would schedule the applicant to come in for a photo ID and would issue the ADA Paratransit certification card including the photo ID. If the application is denied and appealed, Herron/TMP would handle the appeals process.

This option would be the most cost effective, as it utilizes Operations Contractor staff to handle all clerical tasks including phone inquiries, sending out and receiving completed paper applications, corresponding with the application for follow-up on professional verification, data entry into the software database, and sending out required letters and issuing the ADA Paratransit certification card to applicants.

## Software Options

There are a number of software platforms that can be utilized as a tool to assist with ADA Paratransit eligibility determinations. These are essentially database systems that can be utilized in concert with conducting in-person assessments or determinations based on paper applications, or phone interviews. The software provides the letter for follow-up with physician or other professional verifications as needed. The consulting team reviewed three such software packages to determine if the software platforms could be utilized to assist RCTA and CTSA in making ADA Paratransit eligibility determinations.

All three software packages have generally the same features for ADA Eligibility Determination:

- Utilizes responses from paper applications, phone interviews, and professional verification to review applications and make eligibility decisions in each of the three determination categories.

- Ensures privacy of individual applicant information by establishing administrative access levels that can only be viewed by authorized personnel.
- Provides tracking and monitoring to ensure that eligibility determinations are made and letters are sent within the ADA time frame.
- Generates personalized letters to applicants at all phases of the eligibility determination process and if needed the appeals process.
- Generates ADA Paratransit Eligibility cards for those who are eligible.
- Provides a cloud-based database system that enable remote access from any locations with administrative access to the database system.
- Tracks correspondence with each applicant and provides a history of correspondence over time.
- Schedules necessary personal contact with applicants including phone calls or in-person assessments.
- Provides training and technical support to administrative staff utilizing the ADA Eligibility Determination software.



August 26, 2019

**MEMO TO:** Board of Directors

**FROM:** Joe Rye, General Manager



**SUBJECT:** RCTA's New Consolidated Transportation Services Agency (CTSA) Program Implementation and Outreach Schedule.

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**RECOMMENDATION:**

Discussion only. Staff is asking for Board direction on outreach and implementation strategies.

**BACKGROUND:**

In 2018 the Board approved RCTA accepting the nomination to be Del Norte County's official CTSA, and discussed ADA Eligibility Determination and Transit Travel Training as the highest priority potential projects to undertake as the CTSA. The subject morphed into a chapter of the recently adopted 2018-19 RCTA Short Range Transit Plan, where options were explored in depth by the SRTP consultant team. The overall annual CTSA budget is projected to be approximately \$30-35,000/year, so projects are limited.

The SRTP Chapter developed a model that best fits with RCTA's staffing levels and remote location. The recommended model includes the purchase of available software designed for both programs (so that a single annual software license meets the needs of both programs) and the division of labor on the project between RCTA's administration team of Herron/TMTP and a firm with an established local staff presence, like RCTA's operations contractor, First Transit.

**DISCUSSION:**

Herron/TMTP adapted its proposed amendment pricing to meet the overall CTSA budget, after accounting for the CTSA Support contract and software expenditures. Overall, the three elements together will total to about \$35,000 per year, which is the maximum CTSA budget based on a robust TDA funding year. Any slight overage that the CTSA program expenses might incur can be covered by RCTA's base operating budget, as the CTSA programs directly benefit RCTA in several ways, including limiting cost increases for Dial-A-Ride services, and increasing ridership on fixed route via the travel training program.

**Implementation Strategy**

RCTA administration suggest that January 1, 2020 is the start date for implementation. Beginning in September 2019 RCTA will work with GetGoing/Jigsaw Analytics to setup and cusotmize the GetGoing Solution software in preparation for launch near January 1, 2020. On January 1, 2020 RCTA will begin by implementing the ADA Eligibility program on new applicants,

and the related “half-fare” eligibility program on all adults that claim disability in order to ride fixed route at half fare.

Then, once staff has gained experience with the software and the overall process, RCTA can begin requiring existing DAR riders to come into the Eligibility Determination program starting on January 1, 2021. Recertification can begin in 2021 and extend into 2022 if necessary. Half of the existing riders can be brought in during 2021 and the remainder in 2022, as it is believed that the workload will become too much during the re-certification process to do all existing riders in one year. Once an applicant is deemed eligible and been through the process they will generally be eligible for 3 years and will be invited back in again in the year after their third year of eligibility.

### Implementation Timeline

RCTA staff will begin implementation of the software in September while planning of the outreach to the public. Outreach will be scheduled in September through November to notify half fare riders that they will need to submit proof of age or disability, and that new DAR applicants will need to enter the evaluation process starting January 1, 2020.

Staff feel that informing the public and key gatekeepers will be critical to the acceptance of the project. Staff will conduct outreach to the Senior Center and local Social Service agencies, while posting information on board buses of a public open house to be schedule in October or November to inform the public of why and how the changes will be implemented.