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# I. Introduction

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## The ADA

The Redwood Coast Transit Authority (RCTA) adopted its original ADA Plan in 2006. This minor update is effective January 2020 to modernize the plan and memorialize any changes that have occurred in 2020 or before. All changes are show in track changes mode (in color). The Americans with Disabilities Act (ADA) of 1990 is a civil rights law. Its stated goal is to assure that persons with disabilities have equality of opportunity, including full access to facilities, programs and services offered to non-disabled individuals. The underlying tenants of the ADA are equal opportunity, full participation, and independence.

The scope of the ADA is far reaching. It extends to discrimination in employment, public services, telecommunications, and public accommodations and services operated by the private sector. Perhaps its most sweeping effects are on transportation. With respect to public transportation, the ADA prohibits public entities from (1) denying individuals with disabilities the opportunity to use public transportation services, if the individuals are capable of using the system, and (2) providing transportation services which discriminate against persons with disabilities.

The law and its implementing regulations impose requirements on all types of public transit service, but, in keeping with the goal of the Act, the primary focus is equal access to mainline fixed route service. In this regard, the law specifies accessible features of buses and bus stops, requires appropriate maintenance, personnel training, communications media, and more. In addition, the law acknowledges that some persons with disabilities are not able to use fixed route services even if these services are accessible. For this reason, **Complementary Paratransit Service** is required under Section 223 of the ADA to serve those persons whose needs cannot be met by fixed route systems.

The intent of the ADA in requiring complementary paratransit service is to assure access for all persons through an alternative that is comparable to fixed route; it is clearly not intended to resolve unmet transit needs nor provide special additional services for target populations, nor function exactly the same as fixed route service.

## **RCTA/Del Norte County ADA Plan**

This ADA Implementation Plan is prepared for Redwood Coast Transit Authority (RCTA), the public transit operator for Del Norte County. It is concerned only with the ADA requirements that affect local fixed route public transit and demand response services in Del Norte County. The purpose of this plan is to assure efficient and cost-effective compliance of local Del Norte County public transit services with the ADA. The project objectives are to:

- Evaluate Redwood Coast Transit services to determine compliance with the ADA.
- Establish an appropriate consumer advisory process for the ongoing planning and implementation of ADA compliant services.
- Identify and forecast the cost of available compliance options.
- Develop and recommend specific policies and actions to implement system improvements.
- Provide readily useable procedures and materials to rapidly implement ADA compliant services.

The Plan is intended as a living document to be reviewed annually and updated as the transit services change. This is the first ADA Plan for RCTA, a joint powers authority that was formed in June 2004 to operate public transit service for the City of Crescent City and the County of Del Norte. When RCTA commenced operations in July 2004, it was determined that a need existed to develop a comprehensive, annually updated ADA Plan for the new agency. This plan draws from policy previously developed to implement the ADA, but distributed among several documents including the Redwood Coast Transit Development Plan (August 2002), and transit operator contracts (1998, 2003). This plan is now being officially updated for the first time in January, 2020.

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## II. Existing Services

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The Redwood Coast Transit system consists of four Crescent City “Local” fixed routes, Red and Blue, Gold and Green, Route 20 between Smith River and Arcata, and Route 199 between Gasquet and Crescent City. , and the Crescent City Dial-A-Ride service.

### **Crescent City Fixed Route Service**

#### **Route Structure, Service Area, and Population Served**

Redwood Coast Transit fixed route service was initiated in June 1999 with the Crescent City bus route. Initially operated as a one-way loop, this service now consists of two small buses operating in opposite directions along an 8.5 mile loop route. The bi-directional service is depicted as the Red Route (clockwise) and the Blue Route (counterclockwise) on the adjacent map.

The Red (Route 2) and Blue (Route 1) Routes were designed to alleviate demand for general public dial-a-ride service. They are based on providing direct service to locations with historically high demand for dial-a-ride trips. These include medical facilities, government offices, shopping centers, and other locations that are activity centers for passengers with disabilities, as well as those who are elderly or children.

Gold (Route 4) and Green (Route 3) were added a few years later to double the amount of service, increasing reach and convenience.

The routes provide convenient access within a three-quarter mile walking distance to all of Crescent City and much of the contiguous unincorporated urban area to the north. The Crescent City Local routes serve a population of approximately 8,000 based on 2000 U.S. Census data.

#### **Fixed Route Days and Hours of Service**

The Red and Blue routes each operate once hourly from 6:30 a.m. until 7:20 p.m., Monday through Saturday. The current timetables are found online at: <http://redwoodcoasttransit.org/routes-schedules/>.

## **Fixed Route Fare Structure**

The cash fare for the Crescent City Blue and Red Routes is \$1.25. Effective in 2018, there are elderly or disability half-fare discounts for this service. Up to two small children (age 6 or under) may ride free with an adult. “Crescent City Local” Monthly Bus Pass ranges between \$15.00 and \$30.00 and is valid for unlimited rides.

## **Fixed Route Accessibility**

Since its inception, the Crescent City route service has featured design and service standards intended to improve accessibility for persons with disabilities. All buses meet ADA design criteria and drivers undergo an extensive training program which includes training in passenger assistance techniques. RCTA is implementing an all “low-floor” fleet on Crescent City Local Routes, making buses easy to board and alight for the disabled.

## **Arcata and Gasquet Bus Routes (20 & 199)- Commuter/Route Deviation Service**

### **Route Structure, Service Area, Days and Hours of Service**

RCTA’s Regional bus routes, illustrated below, consists of multiple trips daily Monday through Saturday, along Highway 101 between Smith River and Arcata, and Crescent City and Gasquet. The buses makes limited stops in the direction of the commute in order to reduce travel time for customers. In addition to its main alignment along the major highways, these routes will deviate for ADA-eligible customers upon advance request.

### **Population Served**

In addition to Smith River, Gasquet, and Arcata, these routes serve visitors traveling to and from the Klamath area, and it provides a daily connection to Crescent City for a local Klamath population of about 700 (based on the 2000 U.S. Census count for the Klamath CDP).

This route also serves intercity travelers, visitors to Redwood National and State Parks, and commuters traveling between Smith River, Crescent City and Klamath in Del Norte County and Orick, Trinidad, Arcata, Eureka, and other points in Humboldt County.

### **Fare Structure**

Prior to 2018, RCTA Regional Route commuters has the choice of paying a cash fare of \$2 within Del Norte County, or \$30 to reach any point in Humboldt County. The fare

structure was revised in 2018 to a distance based cash fare that ranges between \$2 and \$10 each way. An array of different Monthly Bus Passes were offered. Up to two small children (age 6 or under) may ride free with an adult.

### **Accessibility**

All Redwood Coast Transit buses meet ADA design criteria. Drivers undergo an extensive training program which includes training on the purpose, intent, and requirements of the ADA. Bus stops are located so as to provide wheelchair access to the extent possible given the rustic nature of the terrain served. The bus will deviate up to 3/4 mile from the route to pickup an ADA-Eligible passenger who has called 1-7 days in advance for a reservation.

### **Accessibility**

All Redwood Coast Transit buses meet ADA design criteria. Drivers undergo an extensive training program which includes training on the purpose, intent, and requirements of the ADA. Bus stops are located so as to provide wheelchair access to the extent possible given the rustic nature of the terrain served. Complementary paratransit service is not provided as it is met by the provision of 3/4 mile deviation for ADA-eligible riders with advance reservations.

## **Crescent City Dial-A-Ride**

Crescent City Dial-A-Ride provides general public dial-a-ride and ADA Complementary Paratransit service to complement the Crescent City Local Fixed Routes. All Dial-A-Ride vehicles are equipped to comply with ADA standards.

### **Dial-A-Ride Service Area**

The Dial-A-Ride service area is illustrated by the Crescent City Service Map on the next page. The Dial-A-Ride service area boundary is depicted by the wide, translucent, orange line extending from Point St. George on the west, across the north boundary of the airport, the southeastern edge of Lake Earl, along Elk Valley Cross Road and Highway 199 to the western boundary of Jedediah Smith Redwoods State Park. It then follows the State and National Park boundaries to the east and along the southern edge of the service area. The Pacific Ocean is the west boundary.

The Crescent City fixed route service, depicted by the blue line, covers only the urban core area within the much larger Dial-A-Ride service area. The ADA Complementary

Paratransit Service area is represented by the pink shaded area. This Paratransit Service Area is the area within  $\frac{3}{4}$  mile of the fixed route service.

### **Hours and Days of Service**

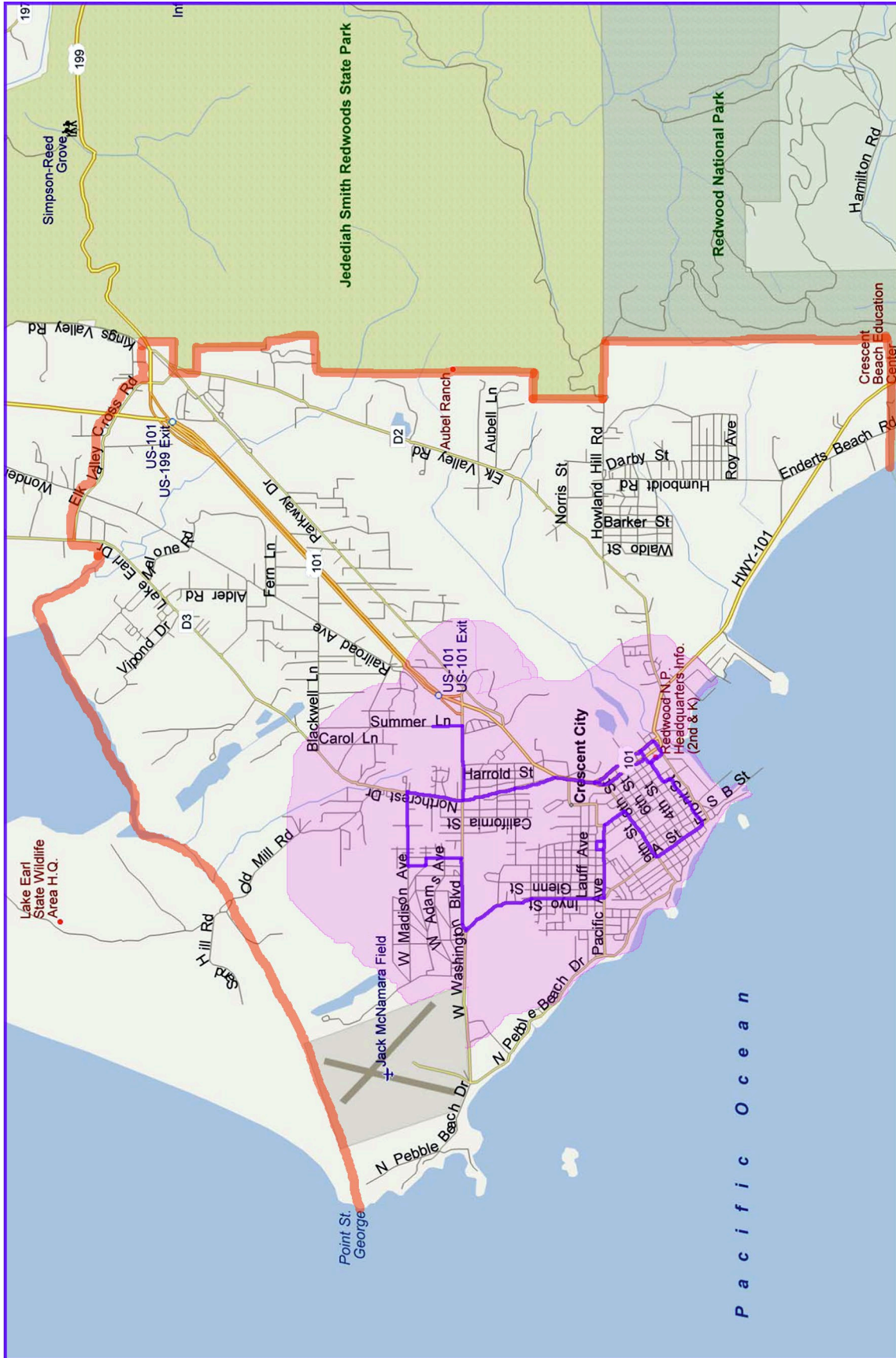
Dial-A-Ride operates the same hours as the Crescent City Local fixed routes, from 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:30am to 7:00 p.m. on Saturday.

### **Fares**

RCTA has adopted a fare of \$1.75 for Dial-A-Ride trips scheduled 1-7 days in advance by persons who are eligible for ADA Complementary Paratransit service. General Public is accommodated on the DAR service for a higher fare (\$5). elderly or who have disabilities. This is the slightly higher than the same fare charged for a comparable trip on the fixed route service, but under the maximum allowable ADA fare (2x fixed route adult fare, or \$2.50). Personal Care Attendants ride free when accompanying a passenger with disabilities.



# Crescent City Service Map



— Dial-A-Ride Service Area Boundary    — Fixed Routes    Paratransit Service Area

### **Response Time, Trip Purpose, and Capacity Constraints**

Redwood Coast Transit Authority provides real-time scheduling on a space available basis, and schedules and provides paratransit service to any ADA paratransit eligible person at any requested time on a particular service day in response to a request for service made the previous day. The time may be negotiated within one hour before or after the individual's desired departure time. RCTA permits advance reservations up to 7 days in advance of the desired trip. There are no restrictions on trip purpose. The RCT operations contractor is required to report trip refusals or missed trips, and to comply with response time and ride time standards.

### **Hours and Days of Service**

Dial-A-Ride operates the same exact hours as Crescent City Local routes: from 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:30 a.m. to 8:30 a.m. to 7:00 p.m. on Saturday.

### **Ridership and Disability Data**

During 2018-19, Dial-A-Ride carried 5396 passengers. RCTA collects data for the number of General Public riders (higher fare) cash fares carried on the Dial-A-Ride service. These total 39 for 2018-19. This is a very small percent of Dial-A-Ride passengers.

## **Other Area Transportation Services**

As of 2019, RCTA is also designated as the Consolidated Transportation Services Agency (CTSA) for Del Norte County. The CTSA is a state-enabled agency charged with the coordination of social services transportation programs. RCTA will initially provide under its CTSA program the following services:

- ADA Eligibility Determination Services – With two different fares in place, it is imperative to have an objective and accurate method of determining true ADA Eligibility. Starting in January 2020, RCTA will introduce a new improved ADA Paratransit Application that will gather data on applicant's ability to ride fixed route service. Applications will be interviewed over the phone and will provide to RCTA contact information for a healthcare professional who can validate how their disabilities prevent them from using fixed route, at least at times. Applicants will be evaluated and if deemed eligible will be issued a photo ID card. Applicants will be offered Travel Training if interested and appropriate.
- Transit Travel Training – RCTA will provide group and individual transit travel training. This innovative program will teach people the subtleties of riding the fixed route system and offer incentives to graduates including free monthly passes for fixed route. Today's seniors often have little experience with fixed route bus service, but can easily learn the new skill with the help of expert trainers.

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## **III. Compliance Analysis:**

### **Differences between Current and Required Services**

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The purpose of this chapter is to identify differences between the existing services and ADA compliant services. This compliance analysis will first review general access requirements and policies applicable to the overall transit system. This will be followed by review specific to the demand response and fixed route services. At each level, a compliance checklist will be used to identify and summarize issues. The issues will be discussed along with implementation alternatives and recommendations. The checklists are based on the compendium of recommended policies to implement ADA compliant services which is attached to this Plan as **Appendix A, ADA Policy.** The complete checklist is provided as **Appendix B, ADA Compliance Checklist.**

### **General System Requirements and Policies**

The following ADA policy categories apply to all services of RCTA: (1) Outreach and Public Participation, (2) Full Access and Integration, (3) Communications, (4) Training, (5) Use Of Lifts and Securement Devices, and (6) Maintenance.

#### **Outreach and Public Participation**

The ADA requires that an ongoing mechanism be created for the participation of individuals with disabilities in the continued development and assessment of services to persons with disabilities. In the past, the Del Norte County Local Transportation Commission has utilized the Social Services Transportation Advisory Committee (SSTAC), a standing committee required by the California Transportation Development Act, to comment on most issues involving elderly and/or disabled populations. This committee includes representation for bus riders with disabilities and agencies that serve individuals with disabilities. It is recommended that the SSTAC provide ongoing assessment of ADA compliance for public transit in Del Norte County.

#### **Full Access and Integration**

To deny individuals the opportunity to use public transit service, if they are capable of using the system, is discrimination. To require use of a separate service, or separate accommodations on the same vehicle, is discrimination. Unfortunately, limitations on

access are frequently the result of well intended rules that arise from the day-to-day operation of public transit services.

As part of the ADA regulatory discussion on non-discrimination, five specific requirements are given to prohibit specific types of transit agency imposed rules. The five requirements concern designated seating, use of attendants, service animals, life support apparatus, and unusual behavior. These prohibitions, which are included as Standards I-A-1 through I-A-5 in the compliance checklist on the next page, are intended to help assure full access by individuals with disabilities to bus services designed for the general public. As the five standards illustrate, whether a person is told to use a particular seat because it is designated for disabled individuals, or is prohibited from riding a bus unless accompanied by an attendant, rules which may have been well-intended can become an undue and discriminatory limitation on access.

The five standards are not exhaustive of the many potential rules that could limit access. For this reason, rules must be carefully considered before implementation. It is recommended that RCTA:

- Request review of proposed rules by the SSTAC and other interested parties.
- Adopt rules as written policies to guide the transit system.
- Implement policies only after assuring that appropriate staff training is in place.

The legitimate concerns which lead to restrictions on transit access can sometimes be more appropriately addressed through a pre-screening process. For example, the ADA specifically allows pre-screening of an individual's need to travel with a Personal Care Attendant, and it requires that this information be stated on ADA Paratransit Certification documents. Similarly, individuals can be asked to identify their need for a service animal or other mobility or life support aids during the ADA Paratransit Eligibility Certification Process (see Chapter 8). These and other conditions which may cause concern to passengers or transit personnel are best discussed with the individual as part of the eligibility determination process. Effective January 2020, these conditions will be identified through the ADA Eligibility Determination Program. When appropriate, information about special conditions can be included in RCTA's DAR scheduling database and/or on an ADA Paratransit Certification Identification Card which will be issued to eligible riders and is presented when boarding the bus.

**COMPLIANCE CHECKLIST**

ADA REFERENCE	POLICY, STANDARD OR CRITERIA	RECOMMENDED ACTION	COMPLIANCE STATUS
<b>GENERAL SYSTEM REQUIREMENTS</b>			
<b>FULL ACCESS</b>			
<b>Policy I-A</b> (49 CFR 37.5(b))	<b>Full Access:</b> Any individual, regardless of disability, shall be afforded full access to any Redwood Coast Transit service for the general public that the individual is capable of using.	Adopt policy.	Complies
<b>Standard I-A,1.</b> (49 CFR 37.5c)	<b>Designated Seating:</b> An individual with a disability shall not be required to use designated priority seats if the individual does not choose to use such seats.	Adopt policy.	Complies
<b>Standard I-A,2.</b> (49 CFR 37.5(d,e))	<b>Attendants:</b> Riders who require an attendant for mobility purposes must be allowed to bring an attendant at no charge; however, in no case will the individual be required to be accompanied by an attendant as a condition for use of the transit system.	(1) Adopt policy. (2) Develop a procedure to certify individual's need for an attendant. (3) Publicize that attendant rides	Current practice, but no certification procedure or public information.
<b>Standard I-A,3.</b> (49 CFR 37.167(d))	<b>Service Animals</b> shall be permitted to accompany individuals with disabilities in vehicles and facilities.	(1) Adopt formal policy. (2) Develop a procedure to certify the need for a service animal.	Complies, but no certification procedure.
<b>Standard I-A,4.</b> (49 CFR 37.167(h))	<b>Life Support:</b> Individuals shall not be prohibited from traveling with respirators or portable oxygen supplies, except when these items violate federal rules concerning the transportation of hazardous materials (49 CFR 37.167h and 49 CFR B(1)c).	Adopt policy.	Complies
<b>Standard I-A,5</b> (49 CFR 37.5(h))	<b>Behavior:</b> An individual shall not be refused service solely because of a disability that results in appearance or involuntary behavior that may offend, annoy, or inconvenience transit system employees or other persons.	Adopt policy.	Complies
<b>INTEGRATION</b>			
<b>Policy I-B</b> (49 CFR 37.105)	<b>Integration:</b> Service available to persons with disabilities shall be provided in the most integrated setting appropriate to the needs of the individual.	Adopt policy.	Current practice.

## Communications

The accessible communications requirements of the ADA apply to all communications necessary to use services as well as to public information and marketing programs.

Accessible Media: Transit agencies are required to provide adequate information on an **as requested basis** in accessible formats and technologies. Since the ADA allows the transit agency to negotiate the format with the requester, it is not necessary to supply materials in any or all formats requested. A variety of accessible formats are very simple to produce.

- Large print materials can be made at low cost using a photocopier that enlarges the image (50%) or by using a 14 point type size in a sans-serif font on a personal computer.
- Computer files can be provided on diskette or by e-mail, and are updated and made available on the RCTA website at all times. .
- Audio tapes are relatively simple to prepare and reproduce.

Schedules provided on computer disk can be transcribed to Braille for as little as \$10-\$20 per page, and printed for about ten cents per page. It remains to be seen whether or not there is local demand for Braille schedules.

Telecommunications Display Device (TDD): RCTA receives one or two TDD (also called TTY or text phone) calls per month. The price of a TDD is as little as \$200, making it potentially affordable for low volume operations. With the low volume of calls, California Relay Service (CRS) is also an acceptable alternative. CRS provides an intermediary operator with TDD capability to function as a translator between a TDD caller and transit system personnel using voice lines. Transit system personnel responsible to receive calls from the public should be thoroughly familiar with whichever system is used. Information materials should reference either a TDD number or California Relay Service. The California Relay phone numbers in Del Norte County are:

Calling from a TDD: 1-800-735-2929

Calling from a Voice Phone: 1-800-735-2922

Website and E-Mail: RCTA has a “Bobby Approved” accessible website with schedule, service, and contact information; the availability of internet access and e-mail communications is broadly publicized and routinely monitored.

Communications Capacity: Because the ability to communicate is particularly crucial for individuals with disabilities to access public transit, any constraint on communications will potentially be seen as a discriminatory constraint on service. This applies not only to accessible media, but also to other communications media used to obtain information or arrange service. For example, if individuals using regular phone service are confronted

with excessive busy signals or long waits on hold to obtain information or arrange service; this may be viewed as a capacity constraint. This is particularly true if it limits access to paratransit service. It is recommended that the transit system adopt a standard regarding the capacity of telephone information and reservation systems. This standard, together with reasonable criteria to measure performance, should be included as a required minimum in the transit system’s agreement with the private contractor responsible to receive information and reservations calls.

**COMPLIANCE CHECKLIST**

ADA REFERENCE	POLICY, STANDARD OR CRITERIA	RECOMMENDED ACTION	COMPLIANCE STATUS
<b>GENERAL SYSTEM REQUIREMENTS</b>			
<b>COMMUNICATIONS</b>			
<b>Policy I-E</b> (49 CFR 37.167(f))	<b>Communications and Public Information:</b> Individuals with disabilities shall be provided, upon request, with adequate information in accessible formats to use and schedule service.	Adopt policy, standards and criteria.	Complies
<b>Standard I-E,3</b>	<b>Accessible Formats:</b> Transit system information shall be provided on an as requested basis in accessible formats such as large print, computer diskettes, electronic mail, Braille, or others as appropriate to the individual's need and agency capabilities.	Provide as needed.	Complies
<b>Standard I-E,4</b>	<b>Communications Capacity:</b> Telephone information and reservation services shall have adequate personnel and phone capacity to respond promptly to requests for information reservations.	Consider establishing criteria, including in operations contract, and monitoring.	Complies
<b>Standard I-E,5</b>	<b>Telecommunications Display Device (TDD):</b> California Relay Service shall be used to provide TDD access to reservation/administrative offices to enable persons with hearing/speech impairments to request/cancel/update trips or obtain other information....		Complies
<b>Standard I-E,6(a)</b>	The California Relay Service TDD number, 1-800-735-2929 shall be published in transit schedules and information brochures.	Include in all publications.	Implement by August 2005.

Additional communications information is found in the fixed route compliance checklist.



## Training

The existing agreement between RCTA and its operations contractor, First Transit, Inc., requires that drivers have training in, among other things, assistance techniques for passengers with disabilities, operation of wheelchair lifts and securement systems, applicable laws and regulations, operating policies and procedures, and customer relations and passenger conduct. Paratransit drivers must possess a General Public Paratransit Vehicle Certificate. The agreement also specifies that dispatchers, telephone operators and supervisors must receive training in customer relations skills, demand response scheduling and services, information referrals, and ADA regulations regarding trip reservations. While the intent of these provisions is to ensure adequate training to meet ADA requirements, it is recommended that the specific language used in the regulations, as given in **Draft Policy III-A** (see checklist), be added to future contract documents.

### **COMPLIANCE CHECKLIST**

ADA REFERENCE	POLICY, STANDARD OR CRITERIA	RECOMMENDED ACTION	COMPLIANCE STATUS
<b>GENERAL SYSTEM REQUIREMENTS</b>			
<b>TRAINING</b>			
<b>Policy III-A</b> (49 CFR 37.173)	<b>Training:</b> Personnel shall be trained to proficiency, as appropriate to their duties, so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service in a respectful and courteous way,	Adopt policy and standards.	Complies
<b>Standard III-A,1</b>	Transit system management and operations contract(s) shall include appropriate training requirements for vehicle operators, telephone operators, dispatchers and operations supervisors.	Complies.	Complies.
<b>Standard III-A,2</b>	Contractor(s) shall submit training and proficiency testing programs for review and approval by RCTA.	Complies.	Complies.

Since the regulations require that training be provided “to proficiency”, it suggests that the training should be comprehensive and that testing should determine each employee’s understanding of the material to ensure that they are fully qualified to serve passengers with disabilities. Therefore, the RCTA management and operations contract can be further strengthened by requiring that the contractor’s training program include testing to demonstrate proficiency of all operations personnel.

Recommended components of employee training include the following:

1. Provide all employees with an understanding of the ADA and related regulations.

2. Provide all employees with instruction on all general operating procedures and adopted plans.
3. Train all employees to understand the different abilities of people with disabilities.
4. Provide drivers, schedulers and dispatchers with more detailed training in understanding disabilities, the various types of mobility aids that riders will be using and in providing assistance to riders.
5. Be sure that drivers, dispatchers and schedulers are well versed in the specific, as well as general, operating policies. Provide copies of written policies and procedures regarding travel by companions, “no shows”, and other key issues.
6. Provide drivers and mechanics with instruction in the safe and proper use and maintenance of vehicle access features.
7. Instruct drivers and dispatchers in handling emergency situations and in proper vehicle evacuation techniques, including special techniques required to assist disabled passengers.

**Use of Lifts and Securement Devices**

RCTA, through its agreement for operating services with First Transit, currently complies with **Draft Policy III-B** (see checklist on next page) and related standards for use of lifts and securement devices as required by the ADA.

**COMPLIANCE CHECKLIST**

ADA REFERENCE	POLICY, STANDARD OR CRITERIA	RECOMMENDED ACTION	COMPLIANCE STATUS
<b>GENERAL SYSTEM REQUIREMENTS</b>			
<b>LIFT AND SECUREMENT USE</b>			
Policy III-B (49 CFR 37.165 and 167(g))	<b>Lift and Securement Use:</b> Individuals with disabilities, including but not limited to those using wheelchairs and mobility devices, shall be permitted to use a vehicle’s lift to enter or exit transit vehicles subject to system standards and criteria.	Adopt policy, standards and criteria.	Complies

**Maintenance of Accessible Features**

RCTA fully complies with maintenance requirements of the ADA. Accessible features are included on the driver’s pre-trip inspection sheet which is completed before the vehicle commences service each day. Defects are reported immediately and repaired promptly. Access features are also listed on the preventive maintenance inspection form which is completed every three thousand (3,000) miles or forty-five days. The current maintenance program complies with **Draft Policy III-C** (see checklist on next page), and specific language regarding ADA maintenance requirements has been added to the agreement for operations and maintenance between the RCTA and its contractor.

**COMPLIANCE CHECKLIST**

ADA REFERENCE	POLICY, STANDARD OR CRITERIA	RECOMMENDED ACTION	COMPLIANCE STATUS
<b>GENERAL SYSTEM REQUIREMENTS</b>			
<b>MAINTENANCE</b>			
<b>Policy III-C</b> (49 CFR 37.161)	<b><u>Maintenance of Accessible Features:</u></b> Features that are required to make vehicles readily accessible and useable by individuals with disabilities shall be regularly inspected and maintained in operative condition (49 CFR 37. 161).	Adopt policy, standards and criteria.	Complies

## Compliance Issues Specific to General Public Dial-A-Ride

RCTA Dial-A-Ride satisfies two important transportation needs. First, it is a general public dial-a-ride service designed to meet the needs of anyone desiring to use the service. Second, it functions as the paratransit service complementary to fixed route in the Crescent City area. It is important to maintain the distinction between these two roles in the design, marketing and evaluation of the service. This section focuses upon the general public aspect of dial-a-ride.

Other than the general system requirements described in the previous section, general public dial-a-ride presents only two service specific compliance issues: (1) vehicle accessibility, and (2) the ability to monitor equal access.

<b>GENERAL PUBLIC DIAL-A-RIDE REQUIREMENTS</b>			
<b>ACCESSIBLE VEHICLES</b>			
<b>Policy I-C</b> (49 CFR 37, 38)	<b>Accessible Vehicles and Facilities:</b> All new or replacement vehicles and facilities shall be accessible to persons with disabilities (49 CFR 37 Subparts C and D).	Complies.	Complies
<b>SERVICE STANDARDS</b>			
<b>Policy II-B</b>	<b>Service Standards:</b> Establish and monitor level of service standards to ensure that a consistent quality and quantity of service is offered as a practical alternative to automobile use for all transit system users.	(1) Adopt policy and standards. (2) Require contractor to sample and compile necessary data.	Sampling & reporting to be implemented April 2005.

### Accessible Vehicles

The RCTA fleet is fully accessible and compliant with ADA standards.

### Service Standards: Procedures to Monitor Equal Access

RCTA must be able to demonstrate that individuals with disabilities are offered services that meet the same standards for reliability as services provided to non-disabled riders. Although the RCTA contract requires its contractor to collect data and maintain compliance with such standards, the contractor has not routinely provided reports. The contractor, First Transit, has committed to routinely collect and submit reports beginning April 2005. The reliability and on-time performance data are generated by First Transit' scheduling software and included with monthly reports that are reviewed by the RCTA staff and policy board. This will assure consistent monitoring, and it will help RCTA in its consideration of service quality and efficiency issues.

## **Fixed Route Service Compliance Issues**

While the ADA imposes requirements on all types of public transit service, the primary focus is on equal access to mainline fixed route service. There are four aspects of assuring equal access:

1. Non-Discrimination And Full Access requirements, discussed above, assure that individuals with disabilities have full access to any existing general public service that they are capable of using.
2. Accessible Vehicle and Facility standards require that new buses and bus stops be designed to accommodate individuals who have disabilities.
3. Communications requirements specific to fixed route service.
4. Comparable Complementary Paratransit Service is required for individuals who, due to a disability, cannot utilize the fixed route service even if it has accessible features. **This provision does not apply to commuter or intercity bus routes.**

### **Accessible Vehicles**

The RCTA bus fleet fully complies with the accessible vehicle requirements of the ADA. All buses have wheelchair lifts, securement systems, communication systems and dimensions which comply with ADA standards.

### **Accessible Facilities**

Since every user of fixed route transit service begins their journey by traveling to a bus stop, the accessibility of pedestrian paths and bus stops has a major effect on the accessibility of the fixed route system. To the extent that RCTA, the City of Crescent City, the County of Del Norte, the California Department of Transportation, and property owners can work together to improve the access of pedestrian and bus stop facilities, there will be less reliance on complementary paratransit service and greater integration and mobility for individuals who have disabilities.

Bus stop development guidelines, including ADA compliant design recommendations, have been prepared for RCTA and will be presented for approval and adoption in the near future. It is anticipated that the guidelines will be recommended to the City and County for incorporation into their respective development requirements.

**COMPLIANCE CHECKLIST**

ADA REFERENCE	POLICY, STANDARD OR CRITERIA	RECOMMENDED ACTION	COMPLIANCE STATUS
<b>FIXED ROUTE REQUIREMENTS</b>			
<b>ACCESSIBLE FACILITIES</b>			
<b>Policy I-C</b> (49 CFR 37, 38)	<b>Accessible Vehicles and Facilities:</b> All new or replacement vehicles and facilities shall be accessible to persons with disabilities (49 CFR 37 Subparts C and D).	Adopt policy.	Complies
<b>Standard I-C,2</b> (49 CFR 37, Subpart C, Appendix A)	<b>Bus Stops:</b> To the extent development and specification of new bus stops is within the control of RCTA, new bus stops shall comply with RCTA bus stop standards and Section 10.2 of Appendix A to 49 CFR Part 37.	Adopt bus stop standard and criteria. Work with local jurisdictions and development community to implement.	Complies
<b>COMMUNICATIONS</b>			
<b>Standard I-E,1</b> (49 CFR 37.167(b))	<b>Fixed Route Stop Announcements:</b> Vehicle operators shall at all times announce bus stops sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.	Adopt standard.	Complies
<b>Standard I-E,2</b> (49 CFR 37.167(c))	<b>Route Identification at Bus Stops:</b> Where more than one route serves a bus stop, means shall be provided to assist an individual with a visual impairment or other disability to board the proper vehicle.	Adopt standard.	Complies

**Communications: Stop Announcements**

The ADA requires that fixed route transit systems have a system to announce transfer points, major intersections and bus stops, and at intervals along bus routes sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location. RCTA currently complies with this requirement by having its operations contractor, First Transit, train vehicle operators to announce bus stops orally while driving the bus. At some point, RCTA should automate this function if possible using a modern stop announcement system.

**Communications: Route Identification at Bus Stops**

Where more than one route serves a bus stop, individuals with visual impairment, cognitive or other disabilities may have difficulty determining which bus to catch if they must rely solely on destination signs. Various means can be used to assist passengers in making the necessary choice. RCTA has only one bus stop where this situation occurs. Drivers are trained to assist passengers in boarding the correct bus at this stop, including

an announcement of the route and destination prior to departure. This route information is currently given orally by RCTA drivers while opening the bus door. At some point, RCTA should automate this function if possible using a modern stop announcement system. .

### **Comparable Complementary Paratransit Service**

The ADA regulations require that:

*“...each public entity operating a fixed route system, shall provide paratransit or other special service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities that use the fixed route system.”  
(49 CFR 37.121)*

Section 37.131 of the regulations also includes six service criteria for complementary paratransit service. These criteria define the level of the service that is considered comparable to the level of service provided on the fixed route system. Following is an analysis of the differences between the required paratransit service criteria and the current service, that provided by Dial-A-Ride in its function as complementary paratransit service for the Crescent City area.

## **COMPLIANCE ANALYSIS**

### **PARATRANSIT CRITERIA FOR COMPARABLE SERVICE**

The Compliance Checklist on the next page summarizes RCTA compliance with the paratransit criteria for service comparable to that provided with RCTA fixed route service. The following discussion details the compliance.

1. **Service Area:** The regulations require that the paratransit service operate in the same service area as the fixed route system. The service area is defined as a corridor with a width of three-quarters of a mile on each side of each fixed route. The corridor includes an area with a ¾ mile radius at the ends of each fixed route. The regulations also define a “core area” in which corridors may tend to overlap or merge together such that, with few and small exceptions, origins and destinations within the area would be served. In such core areas, paratransit service must be provided to all origins and destinations including any small areas not within the corridors but surrounded by corridors.

The Crescent City fixed route service is the only RCTA service that meets the definition of fixed route. Crescent City Dial-A-Ride provides the required paratransit throughout a much larger service area than required, exceeding ADA law.

The RCTA Regional Routes , which will be discussed below, operates as a commuter service with the additional of advanced scheduled route deviations up to ¾ mile in either direction upon request by an ADA-eligible customer. Paratransit is not required as a complement to this type of service.



**COMPLIANCE CHECKLIST**

ADA REFERENCE	POLICY, STANDARD OR CRITERIA	RECOMMENDED ACTION	COMPLIANCE STATUS
<b>COMPLEMENTARY PARATRANSIT SERVICE</b>			
Policy I-D (49 CFR 37.121)	<b>Complementary Paratransit Service</b> shall be provided to all eligible individuals with disabilities at a level which is comparable to the level of service provided to non-disability users of the fixed route service.	Adopt and implement policy, standards and criteria.	Complies
Criteria I-D-5(a) (49 CFR 37.131)	<b>Service Area:</b> The paratransit service area shall include all origins and destinations within 3/4 mile of a fixed route.	Adopt criteria.	Complies
Criteria I-D-5(b) (49 CFR 37.131)	<b>Hours and Days of Service:</b> The paratransit service shall be available throughout the same hours and days as the fixed route service it complements.	Adopt policy and update Rider's Guide.	Complies, but need to update Riders Guide
Criteria I-D-5(c) (49 CFR 37.131)	<b>Response Time:</b> Paratransit service shall be provided within one hour of the requested pickup or drop-off time, as appropriate, in response to a request for service made the previous day.	Adopt criteria.	Complies
Criteria I-D-5(d) (49 CFR 37.131)	<b>Reservations:</b> Requests for reservations shall be accepted each day between at least 8:00 a.m. and 5:00 p.m. for up to six (6) days prior to the day of service.	Adopt criteria.	Complies
Criteria I-D-5(e)(1) (49 CFR 37.131)	<b>Fares:</b> The fare charged to an ADA paratransit eligible user of the complementary paratransit service shall not exceed twice the full fare for a trip of similar length at a similar time of day on the fixed route system.	Adopt criteria.	Complies
Criteria I-D-5(e)(2) (49 CFR 37.131)	<b>Fares - Personal Care Attendants:</b> Personal Care Attendants shall ride free of charge on all RCTA services available to the general public and/or ADA paratransit eligible individuals.	Include PCA free fare information in schedules and brochures.	Complies, but need to update Riders Guide
Criteria I-D-5(e)(3) (49 CFR 37.131)	<b>Fares - Companions:</b> Companions accompanying the ADA eligible rider on the complementary paratransit service between the same origin and destination shall pay the same fare as the eligible user.	Applicable only to paratransit, include information in ADA Program public information materials.	Complies, but need to provide additional public information.

2. **Hours and Days of Service:** Crescent City Dial-A-Ride has typically mirrored the fixed route service operating hours. The current Dial-A-Ride complies with the ADA, The published online Riders' Guide information describes the hours and areas served by the service. .
3. **Response Time:** Response time is defined as the elapsed time between a request for service and the provision of service (provision of service is defined as the time the vehicle arrives to pickup the passenger). The ADA regulations allow “real-time” scheduling, but are generally based on a next day service reservation concept. With respect to reservations, the regulations establish the following requirements:
  - The paratransit system must accommodate requests for service for a particular time of day made any time during the preceding day.
  - Pickup times may be negotiated with the individual requesting service, but the transit agency may not require an ADA paratransit eligible individual to schedule a trip to begin more than one hour before or after the individual's desired departure time.
  - Requests for service must be taken at least during all normal business hours of the transit agency's administrative offices, as well as during times, comparable to normal business hours, on a day when the offices are not open before a service day. For example, when an individual desires on Sunday to request service for Monday, the transit agency must have the capability to accept the service request. Answering machines are typically used for this purpose.

Dial-A-Ride currently provides both “real-time” scheduling and advance reservations. With either of these scheduling methods, Dial-A-Ride complies with the response time requirement for ADA paratransit.

- IV. **Fares:** The current RCTA fare structure complies with the ADA criteria for comparable fares, but some additional training and publicity is recommended for Personal Care Attendant and Companion fares.

Personal Care Attendants (PCAs) traveling with ADA paratransit eligible riders cannot be charged a fare on fixed route, general public dial-a-ride or ADA paratransit. While RCTA allows attendants to ride free, the policy is not described in the published Riders' Guide. The next Rider's Guide update and ADA program information should publicize the no fare policy for PCAs.

Fares for companions traveling with ADA eligible riders on complementary paratransit service pay the same fare as the eligible individual. Companions are allowed on a space available basis. This policy should be published in materials about RCTA Dial-A-Ride service and/or the ADA paratransit program.

As specifically allowed in the ADA regulations, it is recommended that RCTA charge higher fares or contract rates to social service agencies or other organizations for agency related trips that impact the paratransit service. For example, groups of agency passengers traveling to the same program at approximately the same time may require operation of additional vehicles to avoid capacity constraints. Charging of higher fares or contract rates in this situation will provide for the additional service and protect the transportation access of individuals using the service.

**COMPLIANCE CHECKLIST**

ADA REFERENCE	POLICY, STANDARD OR CRITERIA	RECOMMENDED ACTION	COMPLIANCE STATUS
<b>COMPLEMENTARY PARATRANSIT SERVICE, CONTINUED</b>			
Criteria I-D-5(f) (49 CFR 37.131)	<b><u>Trip Purpose Restrictions:</u></b> No restrictions or priorities allowed based on trip purpose.	No action needed.	Complies
Criteria I-D-5(g) (49 CFR 37.131)	<b><u>Capacity Constraints:</u></b> Availability of complementary paratransit service to ADA paratransit eligible individuals shall not be limited by any practice or operational pattern that significantly limits the availability of service to ADA eligible persons.	Adopt criteria and policy II-B: Level of Service Standards. Monitor on-time, denials, ride time, subscription service ratio.	Complies

5. **Trip Purpose Restrictions:** RCTA has no trip purpose restrictions.
  
6. **Capacity Constraints:** Written and adopted policies and standards are required to assure that the availability of paratransit service for individuals who have disabilities is not restricted either by policy, practice or operational pattern. RCTA has initiated a program to monitor the on-time, wait-time and ride-time performance of the Dial-A-Ride service. It is important to formally adopt such standards for all of the complementary paratransit service to be provided, require the operations contractor to incorporate appropriate performance data in monthly reports, and establish a schedule for periodic review of paratransit level of service standards by the RCTA policy. A recommended policy and standards are provided as part of this Plan.

## **Regional Route Compliance Issues**

The RCTA Regional Routes operates as a commuter service in the plus deviation of up to ¾ mile from its alignment with advance trip reservation by ADA-eligible riders.

Commuter bus service must meet the same accessible facilities and communications requirements as fixed route buses, but there is no complementary paratransit requirement, this is covered by the deviations scheduled 1-7 days in advance.

As a route deviation service, the Regional Routes must also comply with recommended policy II-B, Service Standards, which requires that RCTA establish and monitor level of service standards to ensure that a consistent quality and quantity of service is offered as a practical alternative to automobile use for all transit system users. A monitoring program has been initiated to track RCTA performance in relation to the service standards proposed in this plan beginning in April 2005.

## **V. ADA Service Demand and Cost**

### Forecasting the Demand and Cost for ADA Paratransit Service

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The level of demand for paratransit service depends on a variety of factors including, among other things, the population of ADA eligible individuals within the service area, the number of trips that this population makes, the accessibility of fixed route service, the parameters of the paratransit service to be offered, and the availability of other modes of transportation to eligible individuals. Given the complexity and cost of determining these factors, many transit agencies have found that it is very difficult to reliably project paratransit demand. In fact, it can be fairly said that, except for actual operating experience, there is no reliable estimation technique that is reasonable for small transit agencies to utilize.

The RCTA Dial-A-Ride service has been in operation for many years. It has functioned in substantial compliance with the ADA since at least 1998. It is anticipated that the demand for ADA paratransit service is substantially met and that future demand will increase at approximately the same rate as the overall population growth. In recent years, demand has actually declined.

Over the next twenty years, growth in demand for ADA paratransit service will be easily accommodated by the Dial-A-Ride service through the migration of general public passengers to the fixed route system. This migration will be encouraged through fare pricing policies that create an incentive for general public passengers to use fixed route service, rather than Dial-A-Ride.

Since the existing operations contract with First Transit requires the contractor to comply with the requirements set out in this plan, including supporting RCTA's implementation of an ADA Paratransit Eligibility Certification Program, there is no increase in cost anticipated to fully implement all requirements.

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## VI. Timetable for Implementation

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The following timetable provides an implementation schedule for this ADA Service Plan. It concludes with implementation of all recommendations by August 2005.

<b><u>Target Date</u></b>	<b><u>Milestone</u></b>
December 2005	Operations contractor initiates sampling and reporting of reliability data for all services.
January 2006	Public hearing is held and the ADA Implementation Plan is adopted, including Appendix A: ADA Policy.
January 2006	Publicity campaign is initiated regarding the availability of ADA complementary paratransit certification and program information.
January 2006	Operations contractor implements ADA complementary paratransit eligibility certification process.
March 2006	Full implementation of the Plan.
January 2020	Update of the Plan

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## **VII. ADA Complementary Paratransit Eligibility Determination Process**

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### **Introduction**

The Americans with Disabilities Act and its implementing regulations establish categories of persons who are eligible to receive paratransit services complementary to fixed route transit service. These persons are functionally defined based upon their ability to use existing fixed route service. While medical information retains some validity in determining functional capabilities, **the required basis for eligibility is solely defined by the functional capability of a person to utilize the existing fixed route service.** For some individuals, this capability will vary according to the trip requested.

The regulations also establish standards for the process of determining eligibility and require that an administrative appeals process be established. The process for certification and appeal must be published by the transit provider.

This section describes the eligibility process for ADA paratransit service complementary to the Redwood Coast Transit Authority (RCTA) fixed route system.

### **Information and Application Materials**

Information about the RCTA's ADA paratransit service, the eligibility certification process and application materials are available to any potential applicant on the RCTA website, by mail, telephone (including California Relay Service), or at various accessible locations throughout the RCTA service area. All materials are available upon request in accessible formats such as large type, audio tape, floppy disc or cd-rom. A copy of the new 2020 RCTA Application for ADA Paratransit Eligibility Form is attached.

## Certification Process

In accordance with USDOT implementing regulations, RCTA has developed a certification process designed to limit ADA paratransit eligibility to persons identified under Section 37.123 of the regulations.

The 2020 Application for ADA Paratransit Eligibility contains questions about functional impairments or disabilities which will be utilized to determine eligibility. This determination may apply to all trip requests or it may be conditional based on the trip requested. The criteria for eligibility are described in the RCTA ADA Paratransit Eligibility Policy.

RCTA utilizes a self-certification process, supplemented by telephone and/or in-person interviews. The applicant completes an application form requesting ADA paratransit services. It includes simple questions about the applicant's ability to use accessible fixed route transit. The form requests that the applicant provide the name of a licensed healthcare professional who can attest to the validity of the information. RCTA shall use its discretion to verify the information with the individuals listed in the application form. The applicant may be called in for a personal interview to verify eligibility.

Eligibility screening will be given to anyone who requests it. All requests for eligibility will be reviewed by the Paratransit Eligibility Coordinator, or his/her designee, and a determination of eligibility will be made within 21 days of receipt of a completed application, or telephone/California Relay interview. Incomplete applications will be promptly returned.

Applicants will be advised of the eligibility determination in writing within 21 days of receipt of a completed application. The eligibility determination letter will explain any eligibility limitations or conditions. If the applicant is determined to be ineligible, the determination letter will state the reasons for the finding. All eligibility determination letters will contain information about appeals, allowing the applicant to exercise their appeal rights and informing them of any conditions relevant to appeals. Applicants will be offered travel training as appropriate.

If applicable, the letter will also contain information about use of the paratransit service and policies related to its use. Information will be provided, as



appropriate, in an accessible format. Enclosed with the letter will be an identification card as described below.

In the event that the 21 day time period for eligibility determination is exceeded, the applicant will be presumed eligible until a formal notification is made.

## **Documentation**

Each applicant that is ADA certified will be provided with an “RCTA ADA Paratransit Certified” identification card as documentation of their eligibility. The cards will include the following information as specified by the US DOT regulations:

- The individual’s name
- The name and telephone number of the certifying agency (RCTA)
- The eligibility date and the expiration date of the certification
- A requirement for a personal care attendant, if any
- Conditions or limitations on eligibility.

In addition, the card will include a certification number which, if requested, must be provided by the individual at the time that a paratransit service request is made.

## **Records**

RCTA will keep a record of all persons determined eligible for ADA paratransit services, and also those who are denied ADA eligibility. These records will be stored in a secure place to ensure the strictest confidentiality. RCTA has purchased GetGoing Software to provide a central repository of ADA Applications and Travel Training clients. This cloud-based software is available to both RCTA’s remote administration, and to local First Transit employees.

## **Appeal Process**

Applicants who wish to appeal conditional eligibility or denial of eligibility may do so within 60 days of receipt of their notification from RCTA.

The appeal will be made to an Appeals Committee composed of the General Manager of First Transit at RCTA, the Executive Director of the Del Norte Local Transportation Commission, and the third person from the community with

expertise and interest in the topic, such as a member of DNLTC Social Services Transportation Advisory Committee.

The appeal can be made in writing, or the applicant may request to appear in person. The Appeals Committee will meet on an adhoc basis within 18 days of receiving an appeal request and will schedule its meeting at least five days in advance. Transportation to/from an Appeals Committee meeting will be offered to the applicant if the rider lives within the ADA defined service area.

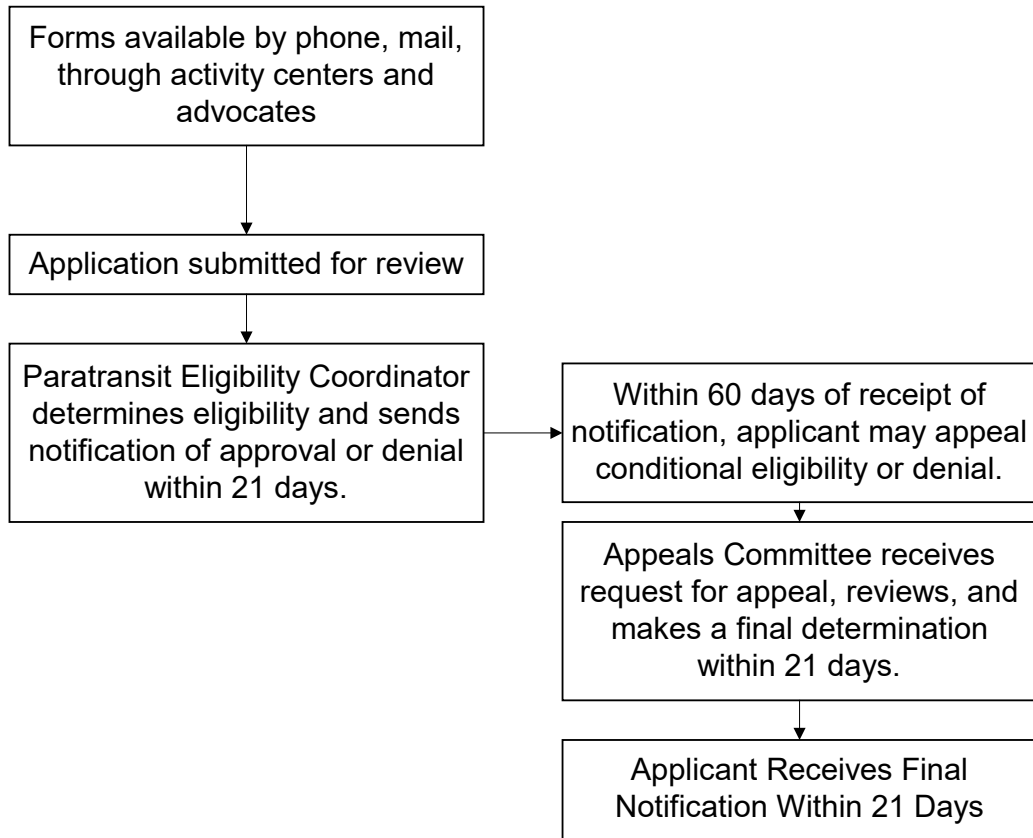
The Appeals Committee will review the application and appeal based on the ADA, its implementing regulations, and applicable policies of RCTA. Additional information, including an interview with the applicant, will be collected as necessary.

If the Appeals Committee overturns the initial review of the application, this decision will be final and the rider will be mailed their notice of eligibility within 3 days following the Committee review.

If the decision to deny or grant conditional eligibility is upheld, a letter will be sent to the applicant within 21 days from the date of the request for an appeal indicating the decision of the Appeals Committee. The decision of the Appeals Committee shall be final.

The following diagram summarizes the application and appeals process.

## **ELIGIBILITY DETERMINATION PROCESS**



### **Suspension of Service**

The General Manager of the RCTA is authorized to suspend the provision of complementary paratransit service to ADA eligible individuals who establish a pattern or practice of missing scheduled trips. The term of the suspension shall be 30 days. The basis for suspension of service shall exclude trips which are missed for reasons beyond the control of the individual, such as vehicle arrival beyond the reservation time window stated at the time the reservation was made.

Before suspending service, the individual shall be notified in writing that RCTA proposes to suspend service, citing the specific basis for the suspension and

setting forth the proposed sanction. The individual shall have the right to appeal the proposed suspension within 30 days of receipt of notification. If an appeal is made, the appeal process described above will be followed.

The rider making the appeal must show that one or more of the following criteria applies to the case:

1. One or more of the missed trips should not have counted. The rider must explain why the missed trip should not have counted.
2. The rider's disability prevented him/her from calling to cancel scheduled trips or from taking the trips.
3. The loss of service would cause severe hardship (e.g., loss of job, interruption of critical medical treatment).

The proposed sanction will be stayed pending outcome of the appeal.

## **Personal Care Attendants**

Applicants requiring the use of a personal care attendant to assist with mobility will be required to disclose this information as part of the eligibility review process. While an attendant cannot be required, RCTA retains the authority to refuse transportation to an individual who, in RCTA's experience, cannot safely travel on-board RCTA without the support of a personal care attendant. Should an attendant be required, this will be indicated on the rider's identification card. Upon presentation of the card, a personal care attendant will be allowed to ride without charge when accompanying the eligible individual to or from the same origin or destination.

## **Companions**

When making a reservation for complementary paratransit service, including requests for demand-response service, the ADA eligible individual may request that space be reserved for one or more companions. One individual, in addition to a personal care attendant (if applicable), will be

provided service as a companion of the eligible person. Service will be provided to additional companions on a space available basis. Companions will be charged the same fare as the ADA eligible individual.

In order to be considered a companion, the person accompanying the eligible individual must be traveling to/from the same origin and destination. A family member or friend accompanying an ADA eligible rider will be regarded as a companion, and not as a personal care attendant, unless the family member or friend is acting in the capacity of a personal care attendant.

## **Presumptive and Reciprocal Eligibility**

The right to complementary paratransit service under the ADA cannot be restricted by any tests other than the ability to utilize available fixed route services. Residency in the service area or political jurisdiction of the transit system is not required for ADA eligibility.

For out of area visitors in the Redwood Coast Transit service area, reciprocal eligibility will be provided to anyone with certification in another jurisdiction. The reservation operator may request information included on the individual's identification card and require that the card be presented to the driver to verify eligibility.

For those out of area visitors who have not received eligibility status in their hometown, it is suggested that they apply for complementary paratransit service eligibility at least 21 days in advance of their trip to Del Norte County. By arranging for eligibility certification in advance, the visitor will be certain of their eligibility status and any conditions which may apply. They will also receive advance information about use of the service.

While an advance application is suggested, RCTA will provide an expedited eligibility determination process for visitors. Temporary eligibility will be provided upon presentation by the visitor of documentation which indicates place of residence, and, if the individual's disability is not apparent, documentation of his/her disability. A self-certification of disability will also be required.

If a visitor is not certified eligible in another area and expects to be in Del Norte County for more than 30 days, or if the individual is a frequent visitor and user of Redwood Coast Transit services, RCTA may request that the individual establish local eligibility by completing the RCTA application process. .

## **SAMPLE APPLICATION**

RCTA's new 2020 ADA application is included, beginning on the next page.

**For all applicants for Americans with Disabilities Act (ADA)  
paratransit service.  
Please read carefully.**

1. The Americans with Disabilities Act (ADA) paratransit service is federally mandated safety-net service for people with disabilities that prevent the use of accessible public transit fixed-route vehicles - "regular" buses. The application process for ADA paratransit is designed to help RCTA understand your disabilities or conditions that affect your use of public transit in Del Norte County.
2. The ADA application process may involve some or all of the following: the completion of this application form, a telephone interview with an RCTA eligibility specialist, an in-person transit skills assessment, and information from a healthcare provider who is familiar with your condition.
3. Many people with disabilities use public transit every day. Not all physical, cognitive or psychiatric conditions rise to the level of a disability that prevents use of fixed route buses. For example, you may have allergies that bother you from time to time but do not affect your ability to ride the bus. You do not need to report these types of conditions.
4. Once all the information needed to determine your eligibility is received, you will be sent a letter notifying you of the ADA eligibility decision within 21 days. If you do not receive this letter within 21 days, you are eligible for presumptive service until a determination is made.

**Applicant Profile**

Last Name \_\_\_\_\_ First \_\_\_\_\_  
MI \_\_\_\_\_

Date of Birth \_\_\_\_\_ Gender \_\_\_\_\_

**Home Address**

Street \_\_\_\_\_  
Apt/Unit \_\_\_\_\_  
City \_\_\_\_\_ Zip \_\_\_\_\_  
Code \_\_\_\_\_

**Mailing Address**

Street \_\_\_\_\_  
Apt/Unit \_\_\_\_\_  
City \_\_\_\_\_ Zip \_\_\_\_\_  
Code \_\_\_\_\_

Primary Phone \_\_\_\_\_

**Emergency Contact**

Name \_\_\_\_\_

Relationship \_\_\_\_\_

Phone \_\_\_\_\_

**Mobility Aids (check all that are used)**

Cane       Walker       Manual Wheelchair

Scooter       Seated Walker       Power Wheelchair

Service Animal       Other



Section 1: For [All Applicants](#)

**1. Have you been diagnosed with a disability that would prevent you from...**

**2. Getting on or off an accessible bus?**     **NO**     **Yes**

IF YES, indicate the nature of your disability:

Physical    Psych    Visual    Hearing    Cognitive    Seizure

Is this condition

Temporary (will likely resolve within 12 months)    Improving    Stable  
 Declining

**3. Riding an accessible bus?**     **NO**     **Yes**

IF YES, indicate the nature of your disability:

Physical    Psych    Visual    Hearing    Cognitive    Seizure

Is this condition

Temporary (will likely resolve within 12 months)    Improving    Stable  
 Declining

**4. Understanding/navigating the public transit system?**     **NO**  
 **Yes**

IF YES, indicate the nature of your disability:

Physical    Psych    Visual    Hearing    Cognitive    Seizure

Is this condition

Temporary (will likely resolve within 12 months)    Improving    Stable  
 Declining

**5. Getting to or from a bus stop?**     **NO**     **Yes**

IF YES, indicate the nature of your disability:

Physical    Psych    Visual    Hearing    Cognitive    Seizure

Is this condition

Temporary (will likely resolve within 12 months)    Improving    Stable  
 Declining

**6. Understanding that for everyone some days are better than others, does your condition change from one day to another to the degree that you are limited in your daily activities?**    **NO**     **Yes**

**7. For any disabilities indicated in Section 1, what is your specific diagnosis and when were you diagnosed?**

Diagnosis:

When diagnosed:

8. Are you currently receiving treatment for any conditions?  NO  
 Yes

If yes, please describe:

Are you currently taking prescription medications?

9. Which of the following types of transportation do you use now?  
 Drive myself  RTCA  Paratransit  Family/Friends  
 Walk/Propel  Other

10. Do you have the ability to do the following by yourself?

11. Maintain your balance in crowds (keeping in mind that everyone can be jostled in a crowd.)  NO  Yes

12. Grip small objects like money, credit cards, or handrails.  NO  
 Yes

13. Cross busy streets with signals.  NO  Yes

14. Cross busy streets without signals.  NO  Yes

15. Walk or maneuver up and down curbs or curb cuts.  NO  Yes

16. Walk or maneuver over uneven surfaces like grass, dirt, or gravel.  
 NO  Yes

17. Go up and down a gradual hill (keeping in mind that for most people going uphill is more difficult than going on flat ground.)  NO  
 Yes

18. Wait for about 10 minutes at a bus stop without a bench or shelter (keeping in mind that most people find it easier to sit than to stand.)  NO  Yes

19. Use a cell, smart or regular phone to get information or assistance.  NO  Yes

20. Travel to less familiar or unfamiliar places (keeping in mind that most people are nervous going someplace they have not been before.)  NO  Yes

21. Understand and remember how to get to a bus stop or destination after being shown.  
NO Yes

22. Find and understand bus schedules after being shown how. NO  
Yes

23. Read and understand signs in the community (not understanding signs because English is not the primary language does not qualify for ADA paratransit.)  
NO Yes

### 24. Section 2: Only for Applicants with Visual Impairment

25. Many people use glasses or contacts to help them see better. Have you been diagnosed with a visual impairment that limits your ability to travel by yourself? NO Yes  
Description:

26. Have you been diagnosed as Legally blind NO Yes  
Totally blind NO Yes

### 27. Section 3: Only for Applicants with Hearing Impairment

28. Have you been diagnosed with a hearing impairment that affects your ability to travel by yourself in the community? NO Yes

### 29. 30. Section 4: Only for Applicants with Mental Health Condition

31. Have you been diagnosed with a mental health condition that affects your ability to travel by yourself in the community? NO  
Yes

### 32. 33. Section 5: Only for Applicants with Seizure Condition

34. Have you been diagnosed with a seizure condition? NO Yes

35. When was your last seizure?

### 36. Section 6: For All Applicants

37. Everyone is affected to some degree by extreme weather, whether hot or cold. Does your ability to travel in the community change significantly with the weather?

NO  Yes

38. Some people have become confused traveling to a new place for the first time. Have you ever gotten lost or disoriented going to a place that you know?

NO  Yes

39. Understanding that the ADA does not allow consideration of activities such as no longer driving or carrying packages in determining paratransit eligibility, is there anything else you would like to share today about your ability to use regular fixed route buses?

NO  Yes

Description:

### APPLICANT AGREEMENT

I am applying for Americans with Disabilities Act (ADA) paratransit eligibility provided by RCTA in Del Norte County. I understand that:

1. ADA paratransit is a **safety-net service** for people with disabilities who are unable to use accessible fixed-route public transit. Eligibility is **not** based on age, income, or convenience.
2. I will be asked questions about my disabilities and how they affect my ability to ride accessible fixed-route buses. In addition to submitting an application form, I may be asked to participate in a telephone interview and an in-person transit skills assessments that evaluate my ability to travel independently in the community. My healthcare provider(s) may be contacted for verification of my disabilities.
3. I may have health conditions that do not constitute a "disability" for

purposes of ADA paratransit eligibility.

4. I will be notified in writing within 21 days of RCTA receiving all necessary information to make an eligibility determination. If I am not notified within 21 days of the completed application process, I will be eligible for presumptive eligibility until I am notified of a determination.
5. I have the right to appeal my eligibility determination and I understand that I will be provided with information on the appeal process in my determination letter.
6. I certify that the information provided during this application process is true and correct to the best of my knowledge. I understand that my information will be shared only with RCTA and its contractors or agents for purposes of facilitating ADA Paratransit Eligibility.

***Applicant or Authorized Representative must sign agreement***

**Signature** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Print Name:** \_\_\_\_\_

**Relationship:** \_\_\_\_\_

## Authorization to Disclose Protected Health Information

1. Provider

Name: \_\_\_\_\_ Phone: \_\_\_\_\_

—

Facility

Name: \_\_\_\_\_ Fax: \_\_\_\_\_

—

Type: \_\_\_PCP \_\_\_Mental Health \_\_\_Vision \_\_\_Therapist  
\_\_\_School

\_\_\_Human Services Agency

\_\_\_Other: \_\_\_\_\_

2. Provider

Name: \_\_\_\_\_ Phone: \_\_\_\_\_

Facility

Name: \_\_\_\_\_ Fax: \_\_\_\_\_

—

Type: \_\_\_PCP \_\_\_Mental Health \_\_\_Vision \_\_\_Therapist  
\_\_\_School

\_\_\_Human Services Agency

\_\_\_Other: \_\_\_\_\_

I hereby authorize the practice(s) shown above, including practice employees, to disclose my health information to Redwood Coast Transit Authority (RCTA), solely for the purpose of determining my eligibility for ADA paratransit service.

I understand that

- I have the right to refuse to sign this authorization. I will still be considered for paratransit services, but no weight will be given to disabilities that cannot be verified.
- When my information is used or disclosed pursuant to this authorization, it may be subject to re-disclosure by the recipient and

may no longer be protected by the federal HIPAA Privacy Rule.

- I have the right to revoke this authorization in writing except to the extent that RCTA has acted in reliance upon this authorization.

***Applicant or Authorized Representative must sign agreement***

**Signature** \_\_\_\_\_ **Date:** \_\_\_\_\_  
\_\_\_\_\_

**Print Name:** \_\_\_\_\_ **Relationship:** \_\_\_\_\_  
\_\_\_\_\_

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## **Appendix A: ADA Policy**

### Recommended Policies for ADA Compliant Services

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For ADA compliant services to be planned and effectively implemented, the transit system must have goals, objectives and policies which incorporate ADA requirements into positive action statements that reflect the attitudes, values and aspirations which the community has for its transit system. Standards and Criteria can then be established to measure the performance of the transit system in attaining stated goals and objectives.

Redwood Coast Transit Authority (RCTA) has implemented many of the ADA requirements, but there is currently no adopted RCTA policy concerning services for persons with disabilities. This Chapter provides a recommended ADA program goal, objectives, policies, standards, and criteria to implement the ADA.

### **Goals, Objectives, Policies, Standards and Criteria**

Overall Goal - a broad statement of direction.

- I. Objectives- an action statement that has a measurable result.
  - A. Policies- states what shall be done to accomplish the objective.
    1. Standards-identifies how the activity will be measured.
      - a) Criteria-provides the specific criteria for measurement.



It is intended that the recommended goals, objectives, standards and criteria will be periodically reviewed along with updates to Transit Development Plans, Triennial Performance Audits, and other public transit planning and review documents.

## **SYSTEM GOAL**

### **Provide mobility for all citizens in Del Norte County.**

- I. **OBJECTIVE: Provide persons who have disabilities with comparable access to transit facilities, programs and services.**

#### **POLICIES**

- A. **Full Access:** Any individual, regardless of disability, shall be afforded full access to any RCTA service for the general public that the individual is capable of using. (49 CFR 37.5(b))
1. **Designated Seating:** An individual with a disability shall not be required to use designated priority seats if the individual does not choose to use such seats (49 CFR 37.5(c)).
  2. **Attendants:** An individual with a disability shall not be required to be accompanied by an attendant (49 CFR 37.5(e)).
  3. **Service Animals** shall be permitted to accompany individuals with disabilities in vehicles and facilities.
  4. **Life Support:** Individuals shall not be prohibited from traveling with respirators or portable oxygen supplies, except when these items violate federal rules concerning the transportation of hazardous materials (49 CFR 37.167h and 49 CFR B(1)c).
  5. **Behavior:** An individual shall not be refused service solely because of a disability that results in appearance or involuntary behavior that may offend, annoy, or inconvenience transit system employees or other persons; however, an individual with disabilities may be refused service for engaging in violent, seriously disruptive, or illegal conduct (49 CFR 37.5(h)).
- B. **Integration:** Service available to persons with disabilities shall be provided in the most integrated setting appropriate to the needs of the individual (49 CFR 37.105).

- C. **Accessible Vehicles and Facilities:** All new or replacement vehicles and facilities shall be accessible to persons with disabilities (49 CFR 37 Subparts C and D).
1. Vehicles shall include the access features and meet the requirements specified in 49 CFR Part 38.
  2. To the extent development and specification of new bus stops is within the control of RCTA, new bus stops shall comply with TRAX bus stop standards and Section 10.2 of Appendix A to 49 CFR Part 37.
    - a) To provide for deployment of wheelchair lifts, bus stops shall provide a firm, stable surface with a minimum clear depth (from curb face or roadway edge) of 96 inches and a minimum clear width (parallel to curb or road way edge) of 60 inches to the maximum extent allowed by legal or site constraints. Maximum slope perpendicular to the roadway shall be 1: 50.
    - b) The wheelchair deployment area shall be connected to streets, sidewalks or pedestrian paths by an accessible route.
    - c) Bus route identification signs, excluding route maps and schedules, shall incorporate accessible features (49 CFR 37, A-4.30).
- D. **Complementary Paratransit Service:** Paratransit service shall be provided to eligible individuals with disabilities at a level which is comparable to the level of service provided to non-disability users of the fixed route service.
1. **Eligibility Criteria:** Eligible individuals shall be persons certified by RCTA as eligible for ADA paratransit service in accordance with the following criteria:
    - a) The individual is unable as the result of a physical or mental impairment, and without the assistance of another person, to board, ride, or disembark from a fixed route bus even if they are able to get to the stop and even if the vehicle is accessible (49 CFR 37.123(e)(1)).
    - b) The individual is able to travel on an accessible vehicle, but cannot because accessible features are not available or not in operation on a particular bus or at a particular bus stop (49 CFR 37.123(e)(2)).
    - c) The individual is unable due to a specific impairment related condition to travel to a boarding location or from a disembarking location (49 CFR 37.123(e)(3)).

2. **Trip-by-Trip Eligibility:** An individual shall be ADA paratransit eligible only for those trips for which he/she meets the eligibility criteria (49 CFR 37.123(b)).
3. **Eligibility of Visitors:** Individuals presenting proof of ADA paratransit eligibility certification by another transit agency shall be presumed eligible for a period of 21 days (49 CFR 37.127).
4. **Personal Care Attendants and Companions:** The paratransit service shall accommodate individuals traveling with the ADA paratransit eligible individual as follows:
  - a) A Personal Care Attendant (PCA) shall be accommodated when accompanying an individual whose disability requires the assistance of a PCA.
  - b) In addition to a PCA, one companion shall be accommodated provided that a reservation is made for the companion.
  - c) Additional companions will be accommodated on a space available basis.
  - d) In order to be considered as companions accompanying the eligible individual, the other individuals shall have the same origin and destination as the eligible individual.
5. **Service Criteria:** Paratransit service shall be provided in accordance with U.S. Department of Transportation service criteria for complementary paratransit service (49 CFR 37.131).
  - a) **Service Area:** The paratransit service area shall include all origins or destinations within three-quarters (3/4) of a mile of a fixed route.
  - b) **Hours and Days of Service:** The paratransit service shall be available throughout the same hours and days as the fixed route service it complements.
  - c) **Response Time:** Paratransit service shall be provided within one hour of the requested pickup or drop-off time, as appropriate, in response to a request for service made the previous day.
  - d) **Reservations:** Requests for reservations shall be accepted by telephone each day between 8:00 a.m. and 5:00 p.m. for up to six (6) days prior to the day of service.
  - e) **Fares:** The following fares shall be charged to individuals who are eligible for ADA complementary paratransit service, their companions, and Personal Care Attendants, except that such fares do not apply to

trips that are guaranteed to social service agencies or other organizations.

- (1) The fare charged to an ADA paratransit eligible user of the complementary paratransit service shall not exceed twice the full fare for a trip of similar length at a similar time of day on the fixed route system.
  - (2) Personal Care Attendants shall ride free of charge.
  - (3) Companions accompanying the eligible user between the same origin and destination shall pay the same fare as the ADA paratransit eligible individual.
- f) **Trip Purpose Restrictions:** There shall be no restrictions or priorities based on trip purpose.
- g) **Capacity Constraints:** The availability of complementary paratransit service to ADA paratransit eligible individuals shall not be limited by any practice or operational pattern that significantly limits the availability of service to ADA eligible persons. Such practices or patterns include, but are not limited to, the following:
- (1) Restrictions on the number of trips that will be provided;
  - (2) Waiting lists for access to the service;
  - (3) Substantial numbers of significantly untimely pickups for initial or return trips;
  - (4) Substantial numbers of trip denials or missed trips;
  - (5) Substantial numbers of trips with excessive trip lengths.

E. **Communications and Public Information:** Adequate information in accessible formats shall, upon request, be provided to individuals with disabilities to facilitate service use and scheduling (49 CFR 37.167(f)).

1. **Fixed Route Stop Announcements:** Vehicle operators shall at all times announce bus stops sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.
  - a) Vehicle operators shall announce transfer points, major intersections and destination points, and other locations at sufficient intervals for orientation (49 CFR 37.167(b)(1)).
  - b) Vehicle operators shall announce any stop on request of an individual with a disability (49 CFR 37.167(b)(1)).

2. **Route Identification at Bus Stops:** Where more than one route serves a bus stop, means shall be provided to assist an individual with a visual impairment or other disability to board the proper vehicle.
3. **Accessible Formats:** Information such as route schedules, rider guides and other publications shall be provided on an as requested basis in accessible formats such as such as large print, computer diskettes, electronic mail, and others as appropriate to the individual's need and agency capabilities.
4. **Communications Capacity:** Telephone information and reservation services shall have adequate personnel and phone capacity to respond promptly to requests for information reservations.
5. **Telecommunications Display Device (TDD) Access:** California Relay Service shall be used to provide Telecommunications Display Device (TDD) access to reservation and administrative offices to enable persons with hearing and speech impairments to request trips, cancel or update requests or obtain other information or assistance.
  - a) The California Relay Service TDD number, 1-800-735-2929 shall be published in transit schedules and information brochures.

II. **OBJECTIVE:** Promote use of the transit system.

**POLICIES:**

- A. Provide service to all segments of the population.
  1. Crescent City fixed route service provides local general public bus service in the greater Crescent City area.
  2. Crescent City Dial-A-Ride, a general public paratransit service, complements fixed route service by providing transportation access to ADA paratransit eligible individuals with disabilities, and by offering a convenient curb-to-curb transportation alternative to the general public.
  3. Commuter Bus Service, such as the Klamath Bus when operating in the direction of the commute, provides regional express bus service with limited stops for the general public. If necessary to manage demand, fares may be on a subscription basis.
  4. Regional Route Deviation Service, such as the Klamath Bus when operating in the direction counter to the commute, deviates up to  $\frac{3}{4}$  mile from the published route to extend access for ADA paratransit eligible individuals and the general public.

- B. Establish and monitor level of service standards to ensure that the quality and quantity of service offers a practical alternative to automobile use.
1. **Reliability - Fixed Route:** The percentage of buses departing within 1 minute early to 5 minutes after the scheduled departure time as indicated by published timetables.
  2. **Reliability - Paratransit with Advance Reservation:** The percentage of reservations served within a 20 minute window (plus or minus 10 minutes from the recorded reservation time).
  3. **Service Denials - Paratransit with Advance Reservations:** The percentage of advance reservation trip requests which cannot be scheduled within one hour of requested time.
  4. **Wait Time:** For demand-response trip requests, the elapsed time from the time the request is taken until the vehicle arrives at the address given.
  5. **Ride Time:** The elapse time from passenger boarding to passenger drop-off.

III. **OBJECTIVE:** Provide transit services in a safe, efficient, cost effective manner consistent with service needs.

**POLICIES:**

- A. **Training:** Personnel shall be trained to proficiency, as appropriate to their duties, so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service in a respectful and courteous way, with appropriate attention to the difference among individuals with disabilities. (49 CFR 37.173).
1. Transit system management and operations contract(s) shall include appropriate training requirements for vehicle operators, telephone operators, dispatchers and operations supervisors.
  2. Contractor(s) shall submit training and proficiency testing programs for review and approval by RCTA.
- B. **Lift and Securement Use:** Individuals with disabilities, including but not limited to those using wheelchairs and mobility devices, shall be permitted to use a vehicle's lift to enter or exit transit vehicles subject to RCTA standards and criteria.

1. The individual together with any wheelchair or mobility device must fit within the lift dimension and weight-bearing capacity standards established under 49 CFR 38 (49 CFR 37.165).
    - a) Minimum clear width is 28.5 inches at the platform and 30 inches measured from 2 inches to 30 inches above the platform (49 CFR Part 38.23(b)(6)).
    - b) Minimum clear length is 48 inches measured from 2 inches to 30 inches above the platform (49 CFR Part 38.23(b)(6)).
    - c) Design load of the lift is 600 pounds (49 CFR Part 38.23(b)(1)).
  2. Wheelchairs shall ride in designated securement locations (49 CFR 37.165(b)).
  3. Wheelchairs shall be required to use, if possible, securement systems provided in compliance with 49 CFR 38 (49 CFR 37.165(c)).
  4. Where necessary or upon request, vehicle operators shall assist individuals with disabilities with the use of lifts and securement systems (49 CFR 37.165(f)).
  5. Transit system personnel may recommend, but not require, that an individual using a wheelchair transfer to a vehicle seat (49 CFR 37.165(e)).
  6. Use of the lift shall not be refused at any designated stop unless the lift cannot be deployed, deployment will damage the lift, or temporary conditions at the stop, not under control of RCTA, preclude the safe use of the stop by all passengers.
- C. **Maintenance of Accessible Features:** Features that are required to make vehicles readily accessible and useable by individuals with disabilities shall be maintained in operative condition (49 CFR 37. 161).
1. Access features including lifts, ramps, securement devices, and signage and communication systems shall be inspected daily.
  2. Vehicle operators shall immediately report any failure of a wheelchair lift to operate while in service (49 CFR 37.163(c)).
  3. Repairs to access features shall be made promptly.
    - a) The vehicle shall be removed from service before the beginning of the next service day and repairs shall be made before the vehicle is returned to service (49 CFR 37.163(d)).
    - b) The vehicle may remain in service only if there is no spare available, and, in no case, more than five days with an inoperative access feature (49 CFR 37.163(e)).

4. Preventive maintenance inspection of access features shall be performed every three thousand (3,000) miles or forty-five days, whichever occurs first; and preventive maintenance servicing shall be performed in accordance with manufacturer recommendations.