

Regional Network Management Council

July 22, 2024

Agenda Item 3c

Transformation Action Plan Action 25: Paratransit Eligibility Draft Report

Subject:

Draft report on Transformation Action Plan Action 25: Adopt standardized eligibility practices for programs that benefit people with disabilities.

Background:

In July 2021, MTC's Blue Ribbon Transit Recovery Task Force developed the Bay Area Transit Transformation Action Plan (TAP). The TAP identified five desired outcomes with associated near-term action items to achieve a more connected, efficient, and user-focused mobility network. One outcome was "Accessibility: Transit services for older adults, people with disabilities, and those with lower incomes are coordinated efficiently," and with it came five actions, listed in Attachment A: Transformation Action Plan Accessibility Initiatives.

Action 25: Standardization of Eligibility Practices

Action 25 focuses on establishing standard eligibility practices for programs that benefit people with disabilities [Regional Transportation Connection Clipper® Access program and Americans with Disabilities Act (ADA) paratransit].

Eligibility for both the RTC Clipper Access program and ADA paratransit are based on qualifying disabilities. However, the eligibility criteria for ADA paratransit is more rigorous than the RTC Clipper Access eligibility criteria. RTC Clipper Access provides a Clipper discount on Bay Area transit. MTC and Bay Area transit agencies expanded RTC Clipper Access eligibility to allow ADA paratransit eligible riders to opt into the program, rather than going through the eligibility process. This has streamlined the RTC Clipper Access application process for ADA paratransit riders who can use fixed-route transit under some circumstances. This policy change was completed in September 2023 and has now been fully implemented.

The larger focus of Action 25 is on standardizing the approach to determining eligibility for the nineteen ADA-mandated paratransit programs provided by Bay Area public transit agencies. This work, developed by MTC and the Bay Area Partnership Accessibility Committee (BAPAC), a working group of Bay Area transit and paratransit agency staff, considered the great variations among transit agencies that exist in the Bay Area. These variations include but are not limited to size, jurisdictional density, priorities of riders and elected officials, and existing contracts with eligibility vendors. Because of this, the guiding principles in developing recommendations focused on emphasizing universal practices, reducing burdens to applicants, riders, and transit agencies, regionalizing some functions, and minimizing the level of new investment while also ensuring continued federal compliance.

Draft Report and Recommendations

In consultation with paratransit riders, MTC and transit agency staff have developed draft recommendations and are seeking your feedback and input. The draft report is divided into three sections: (1) An overview of current eligibility practices by public transit agencies in the Bay Area, (2) industrywide best practices and lessons learned from peer transit agencies across the country, and (3) near-term recommendations.

Complete standardization would require a large investment of new funding and would not necessarily be beneficial in all cases. Given the fiscal challenges currently faced by many transit agencies, the draft recommendations identifies near-term actions to achieve the goals outlined by Action 25. A summary of the recommendations are listed below, categorized by recommendations that primarily benefit the riders through improved customer experience and recommendations that improve the quality of the service.

Near Term Recommendations Focused on Customer Experience:

1. Standardize application forms and provide applications online, including translated versions, to meet Title VI requirements
2. Standardize eligibility interview protocols for agencies using in-person and paper/phone-based assessments
3. Standardize the appeals process
4. Standardize definitions of eligibility categories and renewal timelines

5. Explore alternatives to in-person assessments for disability categories that are not conducive to in-person assessments
6. Identify and enhance the promotion of paratransit alternatives and incorporate travel training referrals during the eligibility process

Near Term Recommendations Focused on Quality of Services:

7. Set aside new funding to host regional paratransit eligibility training annually
8. Learn about new eligibility vendors in coordination and with support from MTC
9. Explore technical solutions to enhance eligibility implementation
10. Develop ongoing monitoring strategies for quality assurance
11. Explore increasing the application of trip conditional eligibility

Next Steps:

Following input and feedback from the RNM Council, a final draft report will be presented to the RNM Committee in the fall. Following acceptance of these recommendations, MTC and transit agency staff will coordinate to advance policy changes and implementation through a paratransit eligibility working group. The working group will identify which recommendations to prioritize for implementation and develop an action timeline. The RNM Council will receive update on this effort.

Action:

Information and Feedback

Attachment:

- Attachment A: Transformation Action Plan Accessibility Initiatives
- Attachment B: Bay Area Paratransit Eligibility Transformation Action Plan Draft Report
- Attachment C: Presentation