

SYNOPSIS OF REPORT FOR

**ADA COMPLIANCE REVIEW OF
METRO TRANSIT ST. LOUIS
CALL-A-RIDE, METROBUS AND METROLINK
SERVICES**



SUBMITTED BY:

ADA GURU
Jess Segovia, ADA Compliance Consultant



MARCH 24, 2024

REPORT SYNOPSIS – INTRODUCTION

The Metro Transit ADA Compliance Review, conducted by Jess Segovia of ADA Guru, is a comprehensive review of Call-A-Ride, MetroBus, and MetroLink services. The review included, when appropriate, observations about the vehicles and other accessibility-related equipment used in the delivery of Metro Transit's public transportation services. The report evaluates the ADA compliance of Metro Transit's Call-A-Ride, MetroBus, and MetroLink services, based on federal regulations, documentation review, staff interviews, disability community feedback, and onboard service observations.

This report embarks on a comprehensive examination of achieving ADA compliance of Metro Transit's Call-A-Ride, MetroBus, and MetroLink services, aiming to evaluate its adherence to the federal requirements in order to provide accessible public transit services to passengers with disabilities. By examining these services, ADA sought to identify areas of strength and opportunities for improving Metro Transit's compliance with the ADA, and ultimately striving towards the enhancement of accessibility and inclusivity.

Federal Regulations Compliance

The report examines how Metro Transit aligns its policies, infrastructure, and services with the ADA requirements, such as providing accessible vehicles, signage, communication processes, reasonable modification of policies, equivalency in paratransit services, and accommodation of passengers with service animals.

Documents Review

The report reviews various documents related to Call-A-Ride, MetroBus, and MetroLink operations, such as manuals, reports, training materials, complaints data, public outreach information, and eligibility determination application.

Staff Interviews

The report conducts interviews with key personnel within Metro Transit, such as management, operations staff, accessibility coordinators, and frontline employees, to assess their understanding of ADA requirements, challenges encountered in implementation, training needs, and strategies for enhancing accessibility.

Disability Community Feedback

The report collects feedback from community stakeholders, such as individuals with disabilities, advocacy groups, and local organizations, to capture their perspectives, experiences, and recommendations regarding the accessibility and usability of Metro Transit services.

These interactions included one-on-one interviews via zoom and telephone, attending and presenting at disability advocate meetings, and receiving email communications detailing passenger experiences, concerns, and recommendations. The feedback received was overwhelmingly specific to Call-A-Ride services, however, meaningful feedback was also provided regarding MetroBus services.

In addition to comments received regarding the operational effectiveness and level of ADA Compliance of Metro Transit services and recent (and anticipated) service changes, comments were provided regarding their perceived ineffectiveness of Metro Transit's public involvement processes. Many members of the disability community expressed frustration with not only reductions and changes to the Call-A-Ride service area, but with the process of communicating such changes and obtaining the community's opinions on the proposed changes. This ADA Compliance Review included a review of Metro Transit's public outreach efforts and recommendations for enhancing these processes was provided in Section 4.23 of this document.

Onboard Service Observations

The report observes vehicle operators in the delivery of service to evaluate their adherence to ADA regulations, such as wheelchair securement, passenger assistance, priority seating, and communication with passengers with disabilities.

Reporting Findings

Below are the findings of Call-A-Ride, MetroBus and MetroLink service observations made by ADA Guru during their visit to St. Louis in late February / early March 2024:

“ADA Guru, as a part of the Metro Transit ADA Compliance Review, completed over 15 hours of service observations for Call-A-Ride, MetroBus and MetroLink services between February 29 and March 2, 2024. This information documents the observations made during these undercover “ride-alongs” (MetroBus and MetroLink). The “ride-alongs” were intended to supplement the documentation review, staff interviews and community feedback received regarding Metro Transit's compliance with the ADA and the usability of public transit services by all passengers, especially passengers with disabilities.

General Findings

Overall, Call-A-Ride, MetroBus and MetroLink services were found to be meeting the standard for safe, compliant transit services for passengers with disabilities. While there were instances of service delivery that may negatively impact the experience of a passenger with a disability, and these observations are detailed below, there did not appear to be any patterns or practices that, in ADA Guru's opinion, meet the standard of violating the ADA.

Service delivery issues included buses placed unreasonably far from the curb and boarding/alighting, inconsistent bus stop announcements, not offering wheelchair securement when boarding, difficult to hear rail car announcements, rail Operator not giving additional time for a passenger to board, and a lack of guidance for passengers with disabilities to board the first car successfully (important when operating single car service).

Call-A-Ride Service Observations

ADA Guru spent over three (3) hours with a TSM as they completed multiple “Wellness Checks” of Van Operators. Observations of the boarding of fifteen passengers was observed and no performance issues or policy/ADA violations were observed.

Passengers were greeted, boarded safely, seatbelts secured, wheelchair secured (when needed), etc.

ADA Guru requested, and observed, a Van Operator secure a wheelchair on a lift equipped and a ramp equipped vehicle. During the lift equipped van securement observation, the Operator placed the lap belts over the armrest, which is discouraged as a general practice. ADA Guru provided feedback on avoiding this practice and how to, when possible, place the lap and shoulder belts as close to the passenger's body as possible. It should be noted that placement of belts on or close to a passenger's body is not always possible, as there are elements that are not in the control of the Operator, including the type and size of the wheelchair, the size of the rider, the presence of backpacks and other bags, the size of the wheelchair securement area, etc. The securement of a wheelchair on the ramp-equipped van was completed satisfactorily by a different Van Operator.

MetroBus Service Observations

ADA Guru spent over seven (7) hours riding MetroBus services in and around downtown St. Louis. This included routes 2, 40, 70, and 11. In addition, ADA Guru observed services at the Central West End Transit Center and Broadway-Taylor Transit Center. In total, ADA Guru boarded and observed services on ten (10) buses.

Several ADA-related observations were made during these undercover "ride-alongs". First, an observation was made of three (3) Bus Operators positioning their bus unreasonably far from the curb when boarding / alighting. In a few instances, the bus appeared to be 3-4 feet from the curb. This forced passengers to step into the street and then onto the bus, making boarding more difficult. At one stop, a passenger using a manual wheelchair boarded the bus. There was no observation made or heard of the Operator offering wheelchair securement. The passenger, under their own power, placed their wheelchair in the wheelchair securement area and transferred to a seat for the duration of the ride. The ramp was deployed successfully for boarding and alighting. It is recommended that additional training be provided to enforce MetroBus policy on offering wheelchair securement to every passenger boarding.

There were also instances of the automated announcements either not working or malfunctioning and making the wrong announcements. This was observed on only one of the buses boarded by ADA Guru. It is recommended that additional attention be given to the Pre- and Post-Trip Inspection process and accurate reporting of broken/malfunctioning accessibility equipment.

Although several observations were made by ADA Guru regarding instances of challenges facing passengers with disabilities, general observations support an opinion that no patterns of practices of barriers to using MetroBus services were identified. Perhaps the most significant barrier to passengers with disabilities using MetroBus successfully is the frequent occurrence of buses with a standing load. On two (2) occasions, ADA Guru was unable to board a bus due to standing load.

MetroLink Service Observations

ADA Guru spent over five (5) hours riding MetroLink services, both the Blue and Red Lines. This included boarding and riding on ten (10) different rail cars. Service observations included instances of stop announcements not being made and/or very difficult to hear; especially in tunnels, when taking curves, etc. In addition, no digital signs were observed announcement upcoming stops, etc. This feature is important to passengers with hearing impairments. And become useful to ALL riders when there are instances of difficult to hear announcements.

In addition, an observation was made by ADA Guru of an Operator not seeing a passenger asking for assistance and/or to hold the rail car. In speaking with a Service Supervisor, they explained that Rail Operators are trained to watch the platform and hold service when needed. It did not appear that the Operator was watching the platform, as they ignored the request by the passenger to hold the car (the passenger knocked on the Operator's window).

Several passengers with disabilities were observed using MetroLink services successfully, including a passenger with a Service Animal, a passenger using a manual wheelchair, and a passenger with an apparent mobility issue (limping).

Another observation was the lack of a decal on station platforms identifying where passengers with disabilities should board at the first rail car. This is especially important given MetroLink's "single car" service practice. It is recommended that decals be added to the platform to ensure that passengers with disabilities do not face a barrier when single car service is operating.

Although several observations were made by ADA Guru regarding instances of challenges facing passengers with disabilities, general observations support an opinion that no patterns of practices of barriers to using MetroLink services were identified."

Recommendations

Overall, ADA Guru's opinion of the public transit services provided by Metro Transit are compliant with the vast majority of ADA Compliance requirements. A number of "deficiencies", however, have been detailed in this report, including supporting conclusions of the findings of the recent FTA Triennial Review on Call-A-Ride's pattern or practice of denying trip requests and not having trip availability one day in advance. During the staff interview process, ADA Guru was impressed with the seriousness taken by staff over these "deficiencies", as well as their ongoing attempts to address the issues as quickly and reasonably as possible.

There does appear to be a disconnect between the important of customer service in documentation and training material, and the actual service being delivered to passengers with disabilities. This was especially present in the Call-A-Ride program, where a significant number of complaints were specific to Operator rudeness. ADA Guru has recommended that additional and ongoing training be completed to ensure that Call-A-Ride, and all of Metro Transit's services meet the ADA's requirement of treating passengers in a "courteous and respectful manner."



All of Metro Transit’s services can benefit from improving and expanding their Operator / Service Oversight processes. By improving the quality of service observations by TSM’s, and increasing their frequency, Operators failing to meet the standards of the ADA and Metro Transit’s policies can be identified, counseled and retrained, as appropriate to the issue at hand.

While specific guidance and recommendations have been provided in this introduction, more detailed explanations of such recommendations can be found in the ADA Compliance Review information below.

In conclusion, this report endeavors to provide a comprehensive evaluation of ADA compliance within the public transportation services provided by St. Louis Metro Transit. By examining federal regulations compliance, operational practices, documentation, and data, as well as engaging with key staff and community stakeholders, ADA Guru offers actionable insights that will support the agency in its commitment to enhancing accessibility and inclusivity for all passengers. Through concerted efforts and continuous improvement initiatives, ADA Guru is confident that Metro Transit can ensure that public transportation once again becomes, and remains, a mode of equal opportunity and freedom of mobility for individuals of all abilities.



TABLE OF CONTENTS

Table of Contents

REPORT SYNOPSIS – INTRODUCTION2

- Federal Regulations Compliance2
- Documents Review2
- Staff Interviews2
- Disability Community Feedback2
- Onboard Service Observations3
- Reporting Findings3
- General Findings3
- Call-A-Ride Service Observations3
- MetroBus Service Observations4
- MetroLink Service Observations5
- Recommendations5

1.1 – Prohibiting Discrimination.....9

- Call-A-Ride Finding - *Deficient*9
- MetroBus Finding – *Compliant with Recommendations*10
- MetroLink Finding - *Compliant with Recommendations*10

1.2 – Denying Use of Services12

- Call-A-Ride Finding - *Deficient*12
- MetroBus Finding - *Compliant with Recommendations*12
- MetroLink Finding - *Compliant with Recommendations*13

3.1 – Vehicles Accessible to and usable by Individuals with Disabilities14

- Call-A-Ride Finding - *Compliant*14
- MetroBus Finding - *Compliant*14
- MetroLink Finding - *Compliant with Recommendations*14

4.1 – Providing Paratransit Services Comparable to Fixed Route Services16

- Call-A-Ride Finding - *Deficient*16
- MetroBus Finding - *Not Applicable*16
- MetroLink Finding - *Not Applicable*16

4.20 – Response Time.....17

- Call-A-Ride Finding - *Deficient*17
- MetroBus Finding - *Not Applicable*17
- MetroLink Finding - *Not Applicable*17

4.21 – Reservation Service Availability18

- Call-A-Ride Finding - *Deficient*18
- MetroBus Finding - *Not Applicable*18
- MetroLink Finding - *Not Applicable*18

4.22 – Negotiating Pickup Times19

- Call-A-Ride Finding - *Deficient*19
- MetroBus Finding - *Not Applicable*19
- MetroLink Finding - *Not Applicable*19

4.23 – Advanced Reservations20

- Call-A-Ride Finding - *Compliant with Recommendations*20



MetroBus Finding - *Not Applicable*20
MetroLink Finding - *Not Applicable*.....20

4.27 – Capacity Constraints21
Call-A-Ride Finding - *Deficient*21
MetroBus Finding - *Not Applicable*21
MetroLink Finding - *Not Applicable*.....21

4.29 – Limiting Availability of Service.....22
Call-A-Ride Finding - *Compliant with Recommendations*22
MetroBus Finding - *Not Applicable*22
MetroLink Finding - *Not Applicable*.....22

4.30 – Trip Denials and Missed Trips23
Call-A-Ride Finding - *Deficient*23
MetroBus Finding – *Not Applicable*.....23
MetroLink Finding - *Not Applicable*.....23

5.1 – Maintenance of Accessible Features24
Call-A-Ride Finding - *Compliant*.....24
MetroBus Finding - *Compliant*24
MetroLink Finding - *Compliant with Recommendations*24

5.12 – Announcing Stops25
Call-A-Ride Finding – *Not Applicable*25
MetroBus Finding - *Compliant with Recommendations*.....25
MetroLink Finding - *Compliant with Recommendations*25

5.14 – Route Announcements.....26
Call-A-Ride Finding - *Not Applicable*.....26
MetroBus Finding - *Compliant with Recommendations*.....26
MetroLink Finding - *Compliant with Recommendations*26

5.20 – Providing Adequate time to Board/Disembark.....27
Call-A-Ride Finding - *Compliant*.....27
MetroBus Finding - *Compliant*27
MetroLink Finding - *Compliant with Recommendations*.....27

5.30 – Training Requirements29
Call-A-Ride Finding - *Compliant with Recommendations*29
MetroBus Finding - *Compliant with Recommendations*.....29
MetroLink Finding - *Compliant with Recommendations*30

1.1 – Prohibiting Discrimination

No entity shall discriminate against an individual with a disability in connection with the provision of transportation service. (37.5(a)).

Call-A-Ride Finding - *Deficient*

Description of Findings and Recommendations

Two (2) deficiencies were identified by a recent FTA Triennial Review and supported during the completion of this ADA Compliance Review of Metro Transit's Call-A-Ride program. They are:

1. A pattern or practice of limited availability of ADA Paratransit “Next Day” trips), and
2. A pattern or practice of denied ADA Paratransit trips.

An area of concern was also identified:

1. Rude/Disrespectful Behavior by Van Operators – While complaints data is not available, upon completion of Call-A-Ride complaints descriptions, there is overwhelming evidence that an unusually large number of complaints regarding rude/disrespectful treatment of passengers with disabilities by Van Operators appears to exist. The ADA requires that Operators, “...properly assist and treat individuals with disabilities who use the service in a respectful and courteous way...” (37.173 Training).

Recommendations include:

1. Expanded and ongoing Operator sensitivity training, including inviting passengers with disabilities to share their experiences of living with a disability (this is a best practice recommendation by the FTA in the 2015 FTA ADA Circular).
2. Development of a formal Operator Oversight Policy that includes:
 - a. Creating standards/goals for the number of observations made per year for each Operator.
 - b. Enhancement of observation forms used to include wheelchair securement practices.
 - c. Quarterly review of TSM's by management to ensure that Operator oversight standards are met. In addition, should TSM management identify substandard performance of TSM's in their oversight of Operators, the policy should include detailed retraining/refresher training efforts and comprehensive assessment.
3. Enhance the “Wellness Check” observation form to include more technical aspects of providing assistance to passengers with disabilities, including wheelchair securement proficiency, use of lifts/ramps, boarding/alighting assistance effectiveness, courteous and respectful treatment of passengers, etc.

4. Create processes for reporting ADA-related observations of Van Operators. This is specific to Call-A-Ride management having the ability to generate data reports that identify the ways that Operators are, and are not, meeting performance and customer service standards. Currently, CAR's oversight efforts, and the oversight forms used, are hard copy forms and do not lead to data reporting. *Note: This determination has been developed by completing a qualitative review of the Call-A-Ride program due to the structure of ADA complaints in the COM system. The review of ADA complaints was exclusively reliant on text box content, not data generated from complaints reports. There was no ADA complaints data (organized by categories/subcategories, etc.) provided during this review.*

MetroBus Finding – *Compliant with Recommendations*

Description of Findings and Recommendations

ADA Guru did not identify any patterns or practices of ADA deficiencies in its review of MetroBus services. There are, however, several recommendations to help ensure that passengers with disabilities do not experience barriers or are discouraged from using MetroBus services. They are identified as “Compliance / Area of Concern” in this document. Examples include ensuring that Bus Operators offer wheelchair securement to all passengers boarding using wheelchairs, scooters, etc., and ensuring that buses are positioned close enough to the curb for safe boarding and disembarking of MetroBus vehicles.

MetroLink Finding - *Compliant with Recommendations*

Description of Findings and Recommendations

As a whole, the MetroLink program appears to meet ADA requirements for the delivery of rail services to individuals with disabilities. Areas of concern, however, include:

1. The inconsistent functioning of station elevators – Public input and reports from Metro Transit staff have identified this issue as one that may negatively impact the use of MetroLink services by individuals with disabilities.
2. The inconsistent practice of Train Operator announcements – Public input and ADA Guru's service observations identified occasions where Train Operators failed to make required announcements. It is not ADA Guru's opinion, however, that this meets the standard of a pattern or practice that violates the ADA.
3. Low volume announcements / broken speaker systems – Public input, reports from Metro Transit staff, and ADA Guru's service observations have identified several train cars as having speaker systems that were either broken or very difficult to hear. Many passenger populations, including passengers with visual impairments, rely on announcements

to safely use MetroLink services. It is not ADA Guru's opinion, however, that this meets the standard of a pattern or practice that violates ADA requirements.

4. Lack of ADA ISA (or similar) decals on the platform identifying where passengers with disabilities (especially those using wheelchairs) shall wait in order to board the first rail car – Given MetroLink's single car practice, it is recommended that decals be placed at a boarding location for the first rail car in order to ensure that passengers with disabilities using wheelchairs, etc., can easily and safely board.
5. Age and/or level of maintenance of many MetroLink stations – Public input and ADA Guru's service observations have identified concerns over the age and/or quality of maintenance of MetroLink stations. The 8th/Pine station, for example, contained wet steps leading down to the platform (westbound). The steps were wet the entire week, although it had not rained that week. This may be a "barrier" (concerns for safety) to the use of MetroLink services by passengers with disabilities when/if the station experiences elevator outages.

While ADA Guru is not, at this time, prepared to identify these concerns as ADA deficiencies, it is recommended that Metro Transit review these elements to ensure that they do not become barriers to the use of MetroLink services for passengers with disabilities.

1.2 – Denying Use of Services

Notwithstanding the provision of any special transportation service to individuals with disabilities, an entity shall not, on the basis of disability, deny to any individual with a disability the opportunity to use the entity's transportation service for the general public, if the individual is capable of using that service. (37.5(b))

Call-A-Ride Finding - Deficient

Description of Findings and Recommendations

Two (2) deficiencies were identified by a recent FTA Triennial Review and supported during the completion of this ADA Compliance Review of Metro Transit's Call-A-Ride (CAR) program. They are:

1. A pattern or practice of limited availability of ADA Paratransit “Next Day” trips), and
2. A pattern or practice of denied ADA Paratransit trips.

An area of concern was also identified:

1. Rude/Disrespectful Behavior by Van Operators – While complaints data is not available, upon completion of CAR complaints descriptions, there is overwhelming evidence that an unusually large number of complaints regarding rude and disrespectful treatment of passengers with disabilities by Van Operators appears to exist. The ADA requires that Operators, “...properly assist and treat individuals with disabilities who use the service in a respectful and courteous way...(37.173 Training).

Recommendations for the above “area of concern” is detailed in Section 1.1.

MetroBus Finding - Compliant with Recommendations

Description of Findings and Recommendations

ADA Guru did not identify any patterns or practices of ADA deficiencies in its review of MetroBus services. There are, however, several recommendations to help ensure that passengers with disabilities do not experience barriers or are discouraged from using MetroBus services. They are identified as “Compliance / Area of Concern” in this document. Examples include ensuring that Bus Operators offer wheelchair securement to all passengers boarding using wheelchairs, scooters, etc., and ensuring that buses are positioned close enough to the curb to assist all passengers, especially passengers with disabilities, in safely boarding and alighting MetroBus vehicles.

MetroLink Finding - *Compliant with Recommendations*Description of Findings and Recommendations

As a whole, the MetroLink program appears to meet ADA requirements for the delivery of rail services to individuals with disabilities. Areas of concern, however, include (See Section 1.1 (above) for full descriptions of findings and recommendations):

1. Observations of non-functioning station elevators
2. Operator not making station announcements
3. Low volume announcements / broken speaker systems
4. Lack of ADA ISA (or similar) decals on the platform identifying where passengers with disabilities (especially those using wheelchairs) shall wait in order to board the first rail car
5. Age and/or level of maintenance of many MetroLink stations

3.1 – Vehicles Accessible to and usable by Individuals with Disabilities

(a) Each public entity operating a fixed route system making a solicitation after August 25, 1990, to purchase or lease a new bus or other new vehicle for use on the system, shall ensure that the vehicle is readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs.

Call-A-Ride Finding - *Compliant*

Description of Findings and Recommendations

While a review of Call-A-Ride vehicle configuration was not a part of this project, upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, no patterns or practices were identified regarding vehicles being inaccessible or unusable by passengers with disabilities.

MetroBus Finding - *Compliant*

Description of Findings and Recommendations

While a review of MetroBus vehicle configuration was not a part of this project, upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, no patterns or practices were identified regarding vehicles being inaccessible or unusable by passengers with disabilities.

MetroLink Finding - *Compliant with Recommendations*

Description of Findings and Recommendations

While a review of MetroLink rail car configuration was not a part of this project, upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, no patterns or practices were identified regarding rail cars being inaccessible or unusable by passengers with disabilities. There were observations, however, that are areas of concern regarding passengers with disabilities using the MetroLink system. They are (and are also detailed in Section 1.1):

1. The inconsistent practice of Train Operator announcements – Public input and ADA Guru’s service observations identified occasions where Train Operators failed to make required announcements. It is not ADA Guru’s opinion, however, that this meets the standard of a pattern or practice that violates ADA requirements.
2. Low volume announcements / broken speaker systems – Public input, reports from Metro Transit staff, and ADA Guru’s service observations have identified several train cars as have speaker systems that were either broken or very difficult to hear. Many passenger

populations, including passengers with visual impairments, rely on announcements to safely use MetroLink services. It is not ADA Guru's opinion, however, that this meets the standard of a pattern or practice that violates ADA requirements.

3. Lack of ADA ISA (or similar) decals on the platform identifying where passengers with disabilities (especially those using wheelchairs) shall wait in order to board the first rail car – Given MetroLink's single car practice, it is recommended that decals be placed at a boarding location for the first rail car in order to ensure that passengers with disabilities using wheelchairs, etc., can easily and safely board.

Section 4 – Subpart F – Paratransit as a Complement to Fixed Route Service

4.1 – Providing Paratransit Services Comparable to Fixed Route Services

(a) Except as provided in paragraph (c) of this section, 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 who use the fixed route system.

(b) To be deemed comparable to fixed route service, a complementary paratransit system shall meet the requirements of §§ 37.123–37.133 of this subpart. The requirement to comply with § 37.131 may be modified in accordance with the provisions of this subpart relating to undue financial burden.

Call-A-Ride Finding - Deficient

Description of Findings and Recommendations

Two (2) deficiencies were identified by a recent FTA Triennial Review and supported during the completion of this ADA Compliance Review of Metro Transit’s Call-A-Ride (CAR) program. They are:

1. A pattern or practice of limited availability of ADA Paratransit “Next Day” trips), and
2. A pattern or practice of denied ADA Paratransit trips.
See Section 1.1 for additional information on Call-A-Ride ADA deficiencies and recommendations.

MetroBus Finding - Not Applicable

MetroLink Finding - Not Applicable

4.20 – Response Time

(b) **Response time.** The entity shall schedule and provide paratransit service to any ADA paratransit eligible person at any requested time on a particular day in response to a request for service made the previous day. Reservations may be taken by reservation agents or by mechanical means.

Call-A-Ride Finding - Deficient

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, a pattern or practice of limited availability of ADA Paratransit “Next Day” trips exists in the Call-A-Ride system. Due to capacity constraints, not all Paratransit eligible individuals are able to schedule a trip the previous day. This was also identified during the recent FTA Triennial Review.

MetroBus Finding - Not Applicable

MetroLink Finding - Not Applicable

4.21 – Reservation Service Availability

(1) The entity shall make reservation service available during at least all normal business hours of the entity's administrative offices, as well as during times, comparable to normal business hours, on a day when the entity's offices are not open before a service day.

Call-A-Ride Finding - *Deficient*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, Call-A-Ride reservations does not appear to be compliant with the ADA requirement for comparability with normal business hours. Per the Metro Transit website, The Main Switchboard is available Monday through Friday, 8:00 am to 5:00 pm. Call-A-Ride Reservations is open 7:30 am to 4:30 pm.

It is recommended that Call-A-Ride Reservations adjust its operating hours to 7:30 am to 5:00 pm in order to comply with this requirement.

MetroBus Finding - *Not Applicable*

MetroLink Finding - *Not Applicable*

4.22 – Negotiating Pickup Times

(2) The entity may negotiate pickup times with the individual, but the entity shall 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.

Call-A-Ride Finding - *Deficient*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, Call-A-Ride reservations does not appear to be compliant with the ADA requirement for negotiating pick-up times, as there does exist a pattern or practice of scheduling Paratransit eligible users more than one hour before or after the individual's desire departure time. This was also a finding of the recent FTA Triennial Review.

MetroBus Finding - *Not Applicable*

MetroLink Finding - *Not Applicable*

4.23 – Advanced Reservations

(4) The entity may permit advance reservations to be made up to 14 days in advance of an ADA paratransit eligible individual's desired trips. When an entity proposes to change its reservations system, it shall comply with the public participation requirements equivalent to those of § 37.137 (b) and (c).

Call-A-Ride Finding - *Compliant with Recommendations*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, Call-A-Ride reservations appears to be compliant with the ADA requirement for public participation. In particular, the Metro Transit Title VI Program 2021 details a compensative approach to public outreach.

It is recommended that a standardized outreach schedule be developed for all service changes; giving more than enough time for the public to contribute their opinions on the proposed changes and for Metro Transit leadership to consider the public's contributions before making a formal decision. Feedback provided by many members of the public that ADA Guru communicated with during this project stated that they "believe" that important service changes are approved before taking the issue to the public. This makes the disability community feel that they are not respected and an important part of the service planning process. It is also recommended that any proposed changes to the Public Outreach Plan, including the addition of a standardized outreach schedule, be taken to the public for their input.

MetroBus Finding - *Not Applicable*

MetroLink Finding - *Not Applicable*

4.27 – Capacity Constraints

(f) **Capacity constraints.** The entity shall not limit the availability of complementary paratransit service to ADA paratransit eligible individuals by any of the following:

(1) Restrictions on the number of trips an individual will be provided;

Call-A-Ride Finding - *Deficient*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, Call-A-Ride reservations does not appear to be compliant with the ADA requirement for capacity constraints, as there does exist a pattern or practice of restricting the number of trips an individual will be provided. This was also a finding of the recent FTA Triennial Review.

MetroBus Finding - *Not Applicable*

MetroLink Finding - *Not Applicable*

4.29 – Limiting Availability of Service

(3) Any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons.

(i) Such patterns or practices include, but are not limited to, the following:

(A) Substantial numbers of significantly untimely pickups for initial or return trips;

Call-A-Ride Finding - *Compliant with Recommendations*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, there does not appear to be a pattern or practice of untimely pickups. There is a history, however, of Call-A-Ride failing to achieve its monthly on-time pickup goal of 93%. In recent months Call-A-Ride's on-time performance has steadied.

It is recommended that Call-A-Ride develop strategies for achieving its pickup goal. One suggestion is to change its 30-minute pickup window from 15-15 to 5-25 or 0-30.

MetroBus Finding - *Not Applicable*

MetroLink Finding - *Not Applicable*

4.30 – Trip Denials and Missed Trips

(B) Substantial numbers of trip denials or missed trips;

Call-A-Ride Finding - *Deficient*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation and reporting, Call-A-Ride is deficient for capacity constraints, as there does exist a pattern or practice of trip denials or missed trips. This was also a finding of the recent FTA Triennial Review.

MetroBus Finding – *Not Applicable*

MetroLink Finding - *Not Applicable*

Section 5 – Subpart G — Provision of Service

5.1 – Maintenance of Accessible Features

§ 37.161 Maintenance of accessible features: General.

(a) Public and private entities providing transportation services shall maintain in operative condition those features of facilities and vehicles that are required to make the vehicles and facilities readily accessible to and usable by individuals with disabilities. These features include, but are not limited to, lifts and other means of access to vehicles, securement devices, elevators, signage and systems to facilitate communications with persons with impaired vision or hearing.

Call-A-Ride Finding - *Compliant*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, there were no observations suggesting a pattern or practice of Call-A-Ride improperly maintaining its vehicle fleet, including accessibility features.

MetroBus Finding - *Compliant*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, there were no observations suggesting a pattern or practice of MetroBus improperly maintaining its vehicle fleet, including accessibility features.

MetroLink Finding - *Compliant with Recommendations*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, there were no observations suggesting a pattern or practice of MetroLink improperly maintaining its vehicle fleet, including station access.

There were, however, observations made by ADA Guru suggesting that there are areas that MetroLink can monitor to ensure continued usability and access by passengers with disabilities. They include:

1. PA System used to announcement upcoming stops, etc.
2. Digital signage that can provide stop information for the hearing impaired
3. Elevator functioning
4. Adding boarding decal at first car for passengers with disabilities, especially for passengers using wheelchairs

5.12 – Announcing Stops

§ 37.167 Other service requirements.

(b) On fixed route systems, the entity shall announce stops as follows:

(1) The entity shall announce at least at transfer points with other fixed routes, other major intersections and destination points, and intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.

Call-A-Ride Finding – *Not Applicable*

MetroBus Finding - *Compliant with Recommendations*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, ADA Guru did not identify any patterns or practices of MetroBus failing to announce stops.

During service observations, ADA Guru did occasionally observe either a lack of stop announcements or malfunction of the stop announcement system. While there was no pattern or practice of a failure to announce stops, ADA Guru recommends additional monitoring of the stop announcement system and the requirement for Operators, when the system is not working, to make required stop announcements themselves using the PA System.

MetroLink Finding - *Compliant with Recommendations*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, ADA Guru did not identify any patterns or practices of MetroLink failing to announce stops.

During service observations, ADA Guru did occasionally observe a lack of stop announcements by Operators. While there was no pattern or practice of a failure to announce stations, ADA Guru recommends additional monitoring of Operators to ensure their consistent use of making announcements using the PA System.

5.14 – Route Announcements

(c) Where vehicles or other conveyances for more than one route serve the same stop, the entity shall provide a means by which an individual with a visual impairment or other disability can identify the proper vehicle to enter or be identified to the vehicle operator as a person seeking a ride on a particular route.

Call-A-Ride Finding - Not Applicable

MetroBus Finding - Compliant with Recommendations

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, ADA Guru did not identify any patterns or practices of MetroBus failing to announce stops serving more than one route.

During service observations, ADA Guru did occasionally observe either a lack of stop announcements or malfunction of the stop announcement system. While there was no pattern or practice of a failure to announce stops, ADA Guru recommends additional monitoring of the stop announcement system and the requirement for Operators, when the system is not working, to make required stop announcements themselves using the PA System.

MetroLink Finding - Compliant with Recommendations

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, ADA Guru did not identify any patterns or practices of MetroLink failing to announce stops with transfer points to bus routes or rail lines.

During service observations, ADA Guru did occasionally observe either a lack of announcements by Operators or announcements that were difficult to hear. While there was no pattern or practice of a failure to announce stops, ADA Guru recommends additional monitoring of Operators to ensure their consistent use of making announcements using the PA System that can be heard clearly.

5.20 – Providing Adequate time to Board/Disembark

(i) The entity shall ensure that adequate time is provided to allow individuals with disabilities to complete boarding or disembarking from the vehicle.

Call-A-Ride Finding - *Compliant*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, ADA Guru did not identify any patterns or practices of Operators refusing to allow adequate time for a passenger with a disability to board or disembark from a vehicle.

MetroBus Finding - *Compliant*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, ADA Guru did not identify any patterns or practices of Operators refusing to allow adequate time for a passenger with a disability to board or disembark from a vehicle.

MetroLink Finding - *Compliant with Recommendations*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, service observations, staff interviews, and receiving public input, ADA Guru did not identify any patterns or practices of Operators refusing to allow adequate time for a passenger with a disability to board or disembark from a vehicle.

During MetroLink service observations, there was an incident where a passenger was requesting additional time to board the rail car. This passenger ran towards the Operator window and knocked to get their attention. ADA Guru could not determine if this was a person with a disability, however they did not appear to have a visible disability.

In speaking with a MetroLink supervisor, they stated that Operators are trained to watch the platform for those requesting additional time or assistance; especially passengers with visible disabilities such as a person using a wheelchair. In the incident described, the Operator did not appear to be monitoring the platform, as they did not respond to the passenger in any way and proceeded in service. The passenger was unable to board the vehicle.



It is recommended that an Operations Notice be distributed detailing MetroLink's policy on monitoring station platforms in order to ensure the safe boarding and disembarking of all passengers, including passengers with disabilities.

5.30 – Training Requirements

§ 37.173 Training requirements.

Each public or private entity which operates a fixed route or demand responsive system shall ensure that personnel are 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.

Call-A-Ride Finding - *Compliant with Recommendations*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, staff interviews, service observations, and public input, ADA Guru did not identify any patterns or practices of Call-A-Ride failing to “train staff to proficiency, as appropriate to their duties”.

Given the high number of complaints filed by passengers with disabilities regarding Operator conduct/rudeness, there is concern that the Call-A-Ride training program is not effectively communicating the ADA requirement for treating passengers with courtesy and respect at all times.

In addition, during an observation of wheelchair securement on a lift-equipped vehicle, the Operator placed the lap belt over the armrest; something that is discouraged. ADA Guru provided guidance on avoiding placing securement straps and tie-downs over/in/through armrests, wheels, footrests, etc.

It is recommended that the above issues be reinforced during the initial Operator training program and continually reinforced during the Van Operator Refresher Training Program (VORT). It is also recommended that TSM’s pay close attention to these issues during their Operator service observations and provide counseling/retraining immediately, as appropriate/safe.

MetroBus Finding - *Compliant with Recommendations*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, staff interviews, service observations, and public input, ADA Guru did not identify any patterns or practices of MetroBus failing to “train staff to proficiency, as appropriate to their duties”.

During ADA Guru’s service observations, there was inconsistency in how close to the curb buses were positioned when boarding and disembarking passengers. On one bus, the Operator was as much as four feet (estimated) from the curb, requiring passengers to step into the street and then onto the bus. On another bus,

the Operator positioned the bus no more than 6 inches from the curb and automatically lowered the bus when they observed a passenger who could benefit from a safer boarding and/or disembarking position.

It is recommended that the above issues be reinforced during the initial Operator training program and continually reinforced during the Bus Operator Refresher Training Program (BORT). It is also recommended that TSM's pay close attention to these issues during their Operator service observations and provide counseling/retraining immediately, as appropriate/safe.

Examples include ensuring that Bus Operators offer wheelchair securement to all passengers boarding using wheelchairs, scooters, etc., and ensuring that buses are positioned close enough to the curb to assist all passengers, especially passengers with disabilities, in safely boarding and alighting.

MetroLink Finding - *Compliant with Recommendations*

Description of Findings and Recommendations

Upon completion of a review of submitted documentation, staff interviews, service observations, and public input, ADA Guru did not identify any patterns or practices of MetroLink failing to “train staff to proficiency, as appropriate to their duties”.

During ADA Guru's service observations, the following issues were identified on a few occasions:

1. The inconsistent practice of Operator announcements – Train Operators failed to make required announcements.
2. Low volume announcements / broken speaker systems – Several rail cars with speaker systems that were either broken or very difficult to hear. Many passenger populations, including passengers with visual impairments, rely on announcements to safely use MetroLink services. It is recommended that additional training be provided to Operators, as well as the distribution of an Operations Notice, to reinforce the importance of stop announcements for all passengers, including passengers with disabilities. Information should include reminding Operators of the difficulty of hearing announcements in tunnels and other loud areas.