Involving Individuals with Disabilities in ADA Complementary Paratransit Planning and Implementation

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The paratransit requirements of the Americans with Disabilities Act (ADA) of 1990 require the creation and implementation of an effective public participation program. The program should be designed so that all members of the community, particularly those with disabilities, can contribute to the development and improvement of the transportation services so important to them. Reviews of the paratransit plans and their updates submitted by fixed-route systems made it clear that many require coaching with respect to how to conduct an effective public participation program. A variety of technique can be used to satisfy the letter of the law and fully satisfy its spirit. Considered are the actual requirements of outreach, consultation, opportunity for public comment, accessible formats, public hearings, summarizing issues from the public comment period, and ongoing participation. Suggestions for satisfying the requirements are discussed. Other public participation elements considered to be important are also discussed, including use of the media, surveys of riders and other social service providers, performance monitoring, and planning the public participation process schedule. The most appropriate steps for each technique are offered, and checklists of suggested activities to be used by practitioners are included to ensure that the program is well designed and implemented.

The paratransit requirements of the Americans with Disabilities Act (ADA) of 1990 recognize the importance of public participation to the implementation of program goals. A successful public participation process guarantees that all members of the community, particularly those with disabilities, have the opportunity to contribute to the development and implementation of the paratransit services that are so important to them (*1*).

Considerable benefits can be achieved from a successful process. Community members can offer their ideas and suggestions for improving the service. They can also work with the transit system to help implement new policies and procedures through active participation in the decision-making process. This means that system representatives must have the opportunity to explain why some proposed alternatives are not possible because of available resources.

People with disabilities rely on public participation to express their mobility needs. Each transit system must reflect the importance of transportation as the link to their activities. If people with disabilities believe that this link is in jeopardy, they may exhibit considerable concern about potential changes. Conversely, other community members will usually support a transit system in the necessary decisions if they are assured through communication and involvement that they can benefit from the changes.

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ELEMENTS OF ADA PUBLIC PARTICIPATION PROCESS

ADA requires that specific public participation activities be completed for each paratransit plan. These activities need to be dynamic and continuing well beyond the submission of ADA plan updates. Specific requirements for ongoing public participation include outreach, consultation with individuals with disabilities, opportunity for public comment, accessible formats, public hearings, and summary of issues raised during the public comment period. These requirements are part of Transportation for Individuals with Disabilities. Final Rule (*2*). To effectively satisfy the requirements, a number of techniques are identified and discussed.

Other activities also can contribute to the satisfaction of public participation requirements, including effective use of the media, surveys of riders and social service providers, performance monitoring, and planning the public participation process schedule.

BENEFITS OF PUBLIC INVOLVEMENT FOR TRANSIT SYSTEMS

Many benefits for paratransit systems can be achieved by involving the public in design, implementation, and evaluation. They include avoiding errors, satisfying demand, encouraging the use of other services, easing the fears of riders, and communicating the system point of view.

Gathering input from current and potential riders can avoid costly errors in the long run. In many cases, input from people with disabilities can be educational, providing good ideas for services to satisfy user needs.

By learning about public needs, system efficiency can be improved. Communication with the public is a step toward satisfying demand. It is equally important to communicate the needs of the system to riders so that they can understand the reasons for decisions. Balancing ridership needs while satisfying demand can be achieved by

- Encouraging riders to schedule discretionary trips in off-peak hours, thereby lessening peaks and valleys in demand;
- Encouraging ridership from underserved parts of the service area;
- Determining what types of vehicles are necessary to offer the right mix of features, such as lifts, and to reach and negotiate all parts of the service area; and
- Determining when vehicles are satisfying the needs of individuals.

An important goal of ADA is to move people with disabilities more into the mainstream of activities. Many people with disabilities can use fixed-route service for a number, if not all, of their trips. Communication with the public will encourage the use of all services, including those with fixed routes. Simply making people aware of bus features such as lifts or stop announcement systems and travel training programs can encourage them to ride.

Riders often become concerned about changes to their system. They fear that they will not be able to use it or that it will be more difficult to use. Apprehensive riders can be critical of the system and difficult to work with to bring about changes. Effective communication with the public will address their concerns and allay fears, allow critics to express ideas for alternatives, be more open to changes and the needs of the system, and make attitude changes more easily.

Although not all current riders may fit the ADA definition of eligibility, such as seniors who are not disabled, it is important to include these citizens in the process to learn more about the transportation needs of these riders and alternatives for satisfying them.

Each transit system usually has good technical and economic reasons for the decisions made, but those reasons are not always fully understood by the community. Maintaining communication with the public at all times ensures open communication; that is, there is more likely to be support for the system when its needs are explained to the community.

A successful public participation process can make popular decisions and services even more attractive and can also foster acceptance of less popular decisions. As decisions and plans for fixed-route and paratransit services are being made, it is necessary that community leaders be included in the decision-making process so that they will support these decision as much as possible. Inclusion of community leaders will demonstrate to them and the community at large that the system is trying to satisfy their needs within available resources.

OUTREACH AND THE TRANSIT SYSTEM

Outreach includes steps to offer everyone with disabilities the opportunity to participate in developing paratransit plans, implementing ADA services, and evaluating their quality, including both those currently involved and those who have not previously been involved.

Appropriate steps for successful outreach include the following:

- Selecting goals and targets,
- Developing strategies and materials,
- Assigning personnel to tasks,
- Testing and conducting campaigns,
- Incorporating results into planning and service, and
- Including campaign and planning descriptions in the update.

To identify additional rider groups, "street outreach" programs have been implemented. These are presentations, demonstrations, and other public events at a variety of locations including rehabilitation centers, organizations for people with disabilities, medical facilities, churches, and apartment complexes. In addition, demonstrations of fixed-route bus services have been held at conferences, fairs, and shopping malls. This technique is most effective if demonstrations occur at a diversity of locations and if they can reach a variety of rider groups.

Outreach includes wide-reaching and targeted strategies. Wide-reaching strategies include advertising, media coverage, surveys of groups and individuals, mass mailings, and public appearances.

Wide-Reaching Strategies

The media can be an effective conveyor of information through the following avenues:

- Articles in local and regional newspapers,
- Public service announcements for radio and television,
- Staff interviews on radio and television programs, and
- Television coverage of outreach activities.

All are low cost compared with purchased advertising. Articles, stories, and interviews should highlight the system objectives of obtaining input, forming advisory committees, or conducting public meetings. Coverage should be throughout the service area.

Surveys are an effective method for collecting opinions. Structured questions can be asked about important service issues. Surveys can also inform people about new service features or possible changes and offer them the opportunity to comment.

Advertisements of events and service changes can generate interest and reach out to those not previously included. Because television or newspaper advertising can be costly, other forms of advertising might be more practical and more closely controlled. For example, outreach efforts can be advertised by using space in bus shelters, vehicle exteriors and interiors, transit stops and transfer facilities, and station interiors and exteriors. Advertisements can announce meetings and events, request input on service needs, and invite people to join advisory or ad hoc committees and make suggestions.

Individuals can be reached through public appearances of system representatives at community events and other gatherings such as fairs, festivals, and health exhibitions. Brochures, information handouts, requests for participation, and advertisements of system features can be provided at such events.

Mass mailings can be used to identify previously uninvolved people. Social service agency client lists, riders of other transportation services, residents of congregate housing areas, and members of advocacy groups are good sources. Mailings should convey information and request input.

Through eligibility certification, full lists of riders are available. These lists could be used to request members for an advisory committee. Alternatively, mailings could be more narrowly focused on those who, for example, have ridden more than twice a week. Lists are an effective means of making sure that each committee is appropriately stratified with respect to age, gender, disability, and frequency of system use.

Rider surveys can be completed more quickly and easily than surveys of larger groups in the service area. Riders are easily identified and the surveys can be more specific. Various types of surveys can be used, including phone, mail-back, or on-board surveys. The opinions of current system riders should be sought to support conclusions and decisions.

Surveys of social service providers can alert the system about service quality and rider perceptions. Because many organizations, advocacy groups, and social service providers are involved in paratransit through their clients, ongoing relationships with representatives of these groups exist. Outreach to members and leaders of these groups can be conducted through meetings to discuss specific service features and service problems, resolve controversies, identify and communicate with nonriding members, and establish service relationships.

Targeted Strategies

In contrast to wide-reaching strategies, the system may also need to employ outreach strategies targeted for specific groups of riders or organizations. Public appearances with a presentation, question and answer session, and information handouts work well, informing members and leaders about the system, educating them about the nature and limitations of the service, collecting input about the service, identifying needs, and explaining little-known features of the system.

Another useful targeted strategy is to contact riders directly. Those who contact the system to complain about service can be well informed about its drawbacks. When a complaint is received, it is important to treat it with professionalism and efficiency. After resolution of the complaint, it can be useful to follow up by contacting the individual to learn more about his or her experiences. This contact can serve two purposes: for the transit system it offers another source of input; for the rider it provides an opportunity to offer constructive input. For the benefit of both, it provides assurance to the rider that the system is interested in the opinions of the community and making improvements.

CONSULTATION WITH PEOPLE WITH DISABILITIES

Consultation is a natural follow-on of outreach efforts. Consultation with people with disabilities involves meetings to

- Discuss service alternatives,
- Evaluate service information,
- Develop service plans,
- Gather input, and
- Draft ADA plan updates.

Steps for successful consultation activities include

- Selecting strategies and a timetable,
- Developing agendas and materials,
- Scheduling activities,
- Conducting the actual consultation,
- Including input in the planning process, and
- Including consultation efforts in all plan updates.

Consultation strategies can include a variety of techniques, such as conducting small group meetings to discuss issues and prepare plans. These groups can be formed through direct contact with riders. Interested individuals who contact the system can be invited to joint consultation groups. Fliers and mailings to riders can also invite membership. Groups can be either short or long term and effectively used to work on individual or multiple issues. The system will need to be prepared to educate participants in some of the aspects of its operations. For example, in discussions of the budget some of the amounts may seem large to people who are accustomed to household budgets; an explanation of the costs may be needed. Similarly, those with a business perspective may need some explanation of government rules for financing programs.

Group meetings with members of organizations that represent riders can be effective. A simple checklist includes mailing invitations to a few groups for a preset date, time, and agenda; visiting organization offices by appointment; setting up meetings with each organization; requesting opinions from organizations; and sending information to groups with a request that they arrange a meeting. Participants should be prepared to understand the point of view of the rider groups and should understand that organizations may have conflicting views. In addition, the system should be prepared to compromise, if necessary. During heated discussions, participants should be asked to suggest specific solutions. To reach a consensus, it is best to address issues one at a time. System representatives should always be prepared with all necessary information.

Because paratransit transports large numbers of people to locations that serve their needs, meetings involving riders, caregivers, and site workers at these locations can be effective. Common destinations may include rehabilitation hospitals, schools, job locations, senior centers, nutrition sites, or dialysis clinics.

National and regional organizations and local commissions representing the interests of people with disabilities often have offices in the community. These groups and their representatives are excellent sources of information and consultation for the paratransit service. They are also a good source with respect to such issues as accessible formats, training, pilot tests, material reviews, and participation in outreach activities.

Consultating with the public can involve participants in a variety of roles, including identifying the popularity of particular issues, gaining advice on the content of proposed ideas for procedures, coordinating numerous groups, and ultimately building consensus.

OPPORTUNITY FOR PUBLIC COMMENT

ADA regulations require that a draft plan be made available for public comment before finalization. This is the opportunity for those who worked on the plan, who have been interested in the process, or who will be affected by the plan and any other interested citizens to review the system draft. People should have at least 1 month before the public hearing to review copies of the documents. They should also have approximately 1 month after the hearing to submit any comments, review any other materials from the hearing, and react to events at the hearing.

System success relies on a broad public review of plans. It is important to devise a process for accepting and recording these comments into permanent records. Comments received may be provided in writing or in alternative formats such as telephone or audiocassette, as well as at the public meetings. For individuals who have other communication capabilities, one must arrange to receive and respond to this input in usable formats.

Several steps need to be accomplished:

- Determining an adequate public comment period,
- Developing methods to collect comments,
- Scheduling the period,
- Publicizing the period, and
- Collecting and responding to comments.

It is important to emphasize to the community that public input is encouraged and accepted throughout the year—not just during a designated public comment period. A variety of activities should be conducted before the comment period so the public has adequate opportunities to provide input whenever an issue arises. These activities can be simple, including the use of a brochure for paratransit riders and others that includes the system's telephone number for receiving suggestions.

The length of the public comment period is variable. It should be extended for any or all of the following reasons: limited resources, early completion of the draft, serious remaining issues, multiple hearings, or restricted availability of the draft outside the system offices because of limited resources.

Methods of collecting comments will partially depend on the system's history of public participation. In areas with historically good participation, the methods will be known and tested. In others, the methods will need to include a well-planned and advertised public hearing along with other outreach efforts to notify individuals of the comment period.

It is useful to develop a form for the uniform collection of comments. A simple form can be distributed at public hearings that states, "We want your comments!", provides a two- or three-paragraph explanation and a blank area for individuals to write their comments, and is followed by a thank you. Inclusion of the name, address, and telephone number of the system on the form can also be useful. Similar forms should be used to record input from those who telephone their comments as well as for comments in alternative formats such as on cassette or from a teletypewriter (TTY). Staff members should be available in public to receive comments directly from individuals with disabilities and to enter these comments on the form as well.

Because input received during the comment period is for the public record, the system must track the comments received, sort them by subject, and respond to each one. In some cases, a simple thank-you letter or phone call may be sufficient. Others may require some information or clarification. For issues significant to ADA paratransit service, the system must provide a more extensive response.

ACCESSIBLE FORMATS

One of the most important requirements for public participation is the availability of relevant information in accessible formats. Some individuals with disabilities may not be able to read important information if it is available only in printed pamphlets. In fact, many potential users of ADA service may be discouraged from using the system if they cannot use eligibility forms or learn about important service information.

Accessible formats include but are not limited to the following:

- Large print,
- Braille,
- Audiocassette,
- Computer diskette, and
- TTY.

Steps for providing accessible formats include deciding which formats are necessary and possible, determining available resources, arranging for formats, making formats available to the public, advertising format availability, and including descriptions of format availability in the update.

Deciding which formats are necessary and possible is the first step. Information does not need to be provided in every possible format. The appendix to the regulations points out that there is no sense in giving a computer disk to someone who does not have a computer, or a Braille document to someone who does not read Braille. In other words, accessible formats must be usable by the individual who requests them.

A good outreach process will identify rider characteristics through contact with the riders and the various social service providers in the area. These agencies and riders can suggest which formats will be most helpful and most requested. Systems should select one accessible format and keep copies of required or highly requested documents on hand in that format. To avoid the unnecessary cost of translating documents into Braille when they will never be used, audiocassettes should be readily available and Braille should be provided only in special circumstances.

Once a decision has been made on accessible formats, it will be necessary to determine the support resources required to provide them. This step should be simple, provided that a strong outreach process has been established. A number of organizations—local social service providers; independent living centers; vocational rehabilitation offices; state, local, and national organizations for people with disabilities; commissions and services for individuals with visual or hearing impairments; and state, local, and regional commissions on disabilities—can provide assistance in translating information into accessible formats, or readers may be loaned to the system to orally translate a plan. If they are not able to help directly, these groups will be able to direct the system to an organization in the area that will.

In making arrangements for accessible formats, the system needs to determine whether the materials will be produced in house or by a local organization. The most important factors are cost and the time between the request for a format and the time it is delivered to the individual. Lowest cost and shortest turnaround time are the most beneficial.

The volume of materials produced will drive the costs of accessible format production. Estimates for time and cost of production should be made for one copy of each document as well as for documents in bulk. Frequently requested information, such as rider handbooks, should be kept in ample supply in accessible formats. An additional consideration is the format in which information is received by the system. For example, if an application was requested in Braille by an individual, that individual may complete the application in Braille. Or, perhaps an audiocassette copy of the application was returned with an individual's responses recorded on it. In these situations, the information should be transcribed by the organization that produced the original document.

Eligibility information and rider handbooks should be readily available at churches and synagogues, the transit system, local social service providers, independent living centers, medical facilities, and so forth. Annual system updates are expensive to reproduce in alternative formats. A copy in large print or audiocassette, or both, should be available in the local library and at the system's offices along with regular copies of the plan and update. Executive summaries may be inexpensively translated into accessible formats. These summaries may be sent to local social service providers, riders, advisory committee members, and others.

The availability of materials in accessible formats must be adequately advertised or those who require these materials will not know of their existence. Advertising should be done in accessible formats, such as closed-captioned television, large-print flyers posted on vehicles and in facilities, and radio spots. The availability of materials in accessible formats must be fully described in the plan and subsequent updates. Information in the update should include the formats in which the update was made available, the formats in which applications and rider handbooks were made available, where these formats were made available, the formats that the system had the ability to make available but were not requested, and a description of how, when, and where the availability of information was advertised to the public, including individuals with disabilities.

PUBLIC HEARINGS

The most basic form of participation is the public hearing. ADA regulations require at least one public hearing before the submission of an update, but more than one may be necessary. The purpose is public review of progress toward ADA compliance over the previous year and the review of the ADA plan update. The process should start with outreach, consultation, surveys, and other public involvement well before the public hearing. Months before, the plan should be in the process of being developed with the help of individuals with disabilities. Only after strong outreach and consultation processes should a hearing be held to review the draft plan.

A number of steps are necessary to conduct a successful public hearing, including preparing planning and update materials, determining the date, selecting a site, selecting advertising methods and placing advertisements, holding the hearing, collecting comments at the hearing and in writing, and including documentation in the plan.

Regular public meetings are a good ongoing mechanism for community input, but goals that may be satisfied at a public hearing include final consultation with the public, including individuals with disabilities; discussion of the paratransit service and plan update; and receipt of additional comments and suggestions.

All planning and update materials must be made available to the public at least 30 days beforehand in accessible formats. Scheduling should allow enough time for the completion of the comment period and the incorporation of all comments into a finalized update to be submitted to FTA. For smaller systems with only one population center and a small ADA-eligible population, one hearing may satisfy community needs. However, for systems with a larger population that is distributed over a number of areas, more than one hearing will need to be held.

Hearings should be scheduled to encourage maximum participation; that is, they should be scheduled during the paratransit system's hours of operation to accommodate the transportation needs of the interested individuals. Hearings held during the middle of the day are likely to exclude individuals who are at work or medical appointments. The appropriate time should be determined through the outreach and consultation activities.

Hearing sites need to be convenient for attendees and should include necessary features, such as accessibility for people with disabilities. Good places to start when deciding on a site are facilities that have been used in the past for meetings attended by individuals with disabilities.

The following are additional guidelines for selecting hearing locations:

- Choose a central location in the area of greatest population concentration within the service area,
- Make sure that the site is accessible by public transportation,
- Identify different neighborhoods for multiple hearings in large cities or those involving joint plans, and
- Select sites that satisfy ADA standards for accessibility, including sufficient space for individuals in wheelchairs, control of the temperature in the room, and all necessary equipment.

Extra parking for individuals with disabilities must be provided. In addition, it might be necessary to provide for greater amplification of the sound system or for placement of additional signs for accessible entrances and restrooms.

An attendance sheet should be placed at the entrance to create a record of all attendees and to serve as a basis for expansion of the system's mailing list.

An agenda for the hearing outlining the order of the proceedings should be prepared and distributed to attendees. A typical agenda might start with a brief introduction followed by a presentation of the update or other significant new information. A logical sequence might be discussion of each required section in succession. After the presentation, the hearing should provide an open forum for testimony. Even if all issues had not been resolved in earlier public participation, they should be understood at the time of the hearing and system representatives should be prepared to respond. Issues will not be resolved at the hearing; written responses to the comments should be provided to the individuals testifying.

To maintain order and ensure that all participants have a chance to speak, those wishing to testify should sign up in advance, and there should be a separate sign-up sheet for those who did not sign up in advance. The chairperson of the meeting should call the name of each testifier in turn. A total of 5 min for each speaker is enough for a point of view to be expressed. The time limit ensures that everyone will have a turn. Some flexibility should be maintained, however, for those who have difficulty communicating.

It is important that an interpreter be present to translate oral communication to sign language for those who cannot hear. Interpreters can be found by contacting local and state agencies.

Finally, a record of the hearing should be transcribed.

ISSUES RAISED BY THE PUBLIC

All comments received from the public should be addressed. For many comments the response need only be an acknowledgment of its receipt. For significant issues more action is necessary, such as a prompt, direct response and a clear discussion of how the issue was resolved. Because public comments can come from individuals with all kinds of communication abilities, the system should be prepared to respond in all kinds of formats. If, after a thorough public participation process, no significant issues have been raised by the public, this outcome should be stated in the plan.

ONGOING MECHANISMS

Public participation does not stop with the publication of a plan. To achieve the highest level of success, a comprehensive ongoing process should be developed that satisfies the letter of the legislative requirements in addition to achieving the spirit. The process should continue whatever formal and informal components were initially used. The process also can be substantially changed and improved as needed.

Advisory committees and the hearing can serve as the foundation for a continuing program involving the public. Advisory committees should be constructed to represent the various segments of the local community: representatives should be drawn from social service providers, the transit system, contract service providers, riders and nonriders, and agencies and organizations involved in transportation-related activities for individuals with disabilities.

Rider and nonrider members should clearly represent the various types of disabilities in addition to age, gender, economic status, and race. Although this would suggest a large membership that can be difficult to manage for issues requiring expendiency, a large membership can be effective in self-regulating the members' actions. A committee with a large, representative population can bring all the issues to the table and use consensus-building techniques to make decisions that are in the best interest of riders and advocacy organizations.

The following steps should be part of the ongoing process:

- Provision of a mechanism for riders and others to voice complaints to and commendations for the system,
- Response to every complaint or commendation and fair resolution along with full formal documentation,
- Analysis of all collected data to establish any trends, and
- Implementation of changes and continued monitoring of complaints or commendations to determine the level of success.

Other formal examples of ongoing mechanisms include telephone surveys, focus groups, driver interviews, call-intake staff interviews, customer service staff interviews, newsletters with suggestion forms, and on-board suggestion boxes.

In conducting telephone surveys, staff should be used during the least busy times of the day to randomly select manifests from the previous week and to call a representative number of riders to determine whether their pickups were on time, they were in time for their appointments, the vehicle was clean, the driver was courteous, and other information. This information makes it possible to assess the quality of service being provided and is greatly appreciated by the riders.

The use of focus groups is a formal technique for soliciting information from riders and nonriders. The concept is to put a number of individuals, (approximately 10) together who clearly are believed to represent the attitudes of system users or nonusers. A facilitator knowledgeable in leading focus groups and in paratransit and fixed-route services explores the views of the participants during an interactive session lasting approximately 2 hr.

Rider focus groups can solicit input on current system service quality levels. Companions to rider focus groups are groups involving nonriders. Although many systems are financially unable to satisfy total demand, it should still be a goal to determine why individuals with disabilities are not using the services that are offered. In 1997 all systems will have to satisfy demand in an unconstrained manner. It is better to find out now why people are not riding and to make the appropriate adjustments to service design than to wait until 1997 and find that nonriders have realized that they can demand the opportunity to use the service, which would put the system in a more difficult position.

Vehicle drivers are the only face-to-face personal contact between riders and the system. Their behavior and attitudes convey a message to each rider; in addition they can also be a good source of information. Because they operate wheelchair lifts every day and have firsthand knowledge of their effectiveness and the quality of service they provide, interviews with drivers can identify problems that ultimately can lead to higher quality of service.

Although drivers provide the only face-to-face personal contact with passengers, call-intake staff are the first individuals contacted when a trip is booked. These staff members are ambassadors for the service and are the basic salespersons. They should be regularly interviewed by management to identify any difficulties for prospective system users. Call-intake staff should be sensitive to individual problems and should suggest changes to their supervisors that would improve the quality of service.

Customer service staff are responsible for problem calls from current and potential riders. They have direct contact with riders and receive information about, for example, whether vehicles are on time, clean, and efficiently scheduled and whether the drivers are doing their job effectively. Interviewing such individuals will identify problems and perhaps provide suggestions to effectively resolve them.

It is important to provide information to everyone on a regular basis. A good mechanism is a simple one-page, two-sided newsletter that includes key telephone numbers, changes to the program, success highlights, schedules of upcoming events, and a mail-back coupon designed to identify suggestions for improving service. These newsletters can be sent to everyone within the data base, handed out on vehicles, or made available via human services agencies, banks, social security offices, and other locations riders might frequent. When individuals offer comments, they are making decision makers aware of positive and negative characteristics. Moreover, future newsletters can be used to summarize suggestions that have been made and the actions that have resulted.

Another way to get feedback is to provide a suggestion box on each vehicle along with forms and pencils. Riders should be encouraged to fill out the forms and to insert them into the locked box. It is important to maintain a high level of confidentiality so that riders will not fear retaliation, and there should be a general policy that a supervisor empties the suggestion boxes each day. The data should be tabulated and responded to regularly to guarantee feedback on submitted ideas.

In addition to the formal ongoing mechanisms discussed here, there are a number of informal public involvement techniques that are useful, including "talk-to-the-boss" days, radio/TV/closed-circuit TV (CCTV) talk shows, booths at fairs, vehicle demonstrations, and rider promotions.

An informal technique that clearly demonstrates the commitment of the chief executive officer is talk-to-the-boss days. In fixed-route systems, the general manager and key departmental heads are available at stations or intermodal facilities so that individuals can approach them and express their ideas. This technique has been used effectively by scheduling visits every Thursday, for example, at varying periods during the day. Some systems have also extended the practice to weekends. Fixed guideway and fixed-route transportation accommodates this technique more easily than paratransit. For paratransit services, the manager would need to identify congregate housing sites, typical work or training locations, medical facilities, or shopping centers known to be frequented by riders with disabilities. Knowing these schedules, decision makers can be where the riders are during any day they would like to meet with them. Decision makers may also ride on paratransit tours at various times and on different days to talk with riders.

Radio, TV, and CCTV talk shows are gaining as a means for people to voice their opinions. Talk shows can allow individuals to make anonymous comments, act as a publicity-generating device, be effective in making nonusers aware of the high quality of service being provided, and provide currently satisfied riders the opportunity to independently counteract the charges of complaining riders.

Maintaining a standard booth with a knowledgeable individual and appropriate handout materials at fairs or shopping centers can provide personal interaction. System personnel can provide information, answer questions, and listen to complaints and commendations. This information can then be tabulated and transmitted to system decision makers. Keychains, coloring books, shopping bags, and other promotional materials can be used to attract individuals to the booth.

Most systems are adjusting their vehicle fleets. Positive characteristics of accessible vehicles can be used to attract individuals to the system and to acquire information on their opinions. Vehicle demonstrations can be integrated into fairs or made available at shopping centers, medical facilities, and other sites.

In much the way that grocery stores have promotional sales for their customers, a system can provide rider parties. A transit or paratransit free fare day or a family picnic for riders with free entertainment if riders use the system to get to the picnic site can demonstrate an interest and appreciation for customers. At the same time, such parties can be used to demonstrate new or renovated vehicles and to provide a place for riders to interact with decision makers.

There is no one particular ongoing public participation model that is most appropriate. Each system should use a combination of formal and informal techniques to solicit the information that is necessary to planning and operational decisions. The integrated process does not have to be cumbersome and should indeed be fun for the system, riders, and nonriders. It is important to develop a sense of community and, whenever possible a sense of family among riders and system employees, keeping in mind that family members will share information with each other that they would never share with a stranger.

USE OF MEDIA IN PUBLIC RELATIONS

Steps associated with successful use of the media include (*a*) determining the audience to be reached, (*b*) researching the types of media available, (*c*) choosing the combination of media to use, (*d*) writing advertisements and public service announcements, and (*e*) advertising the public participation process.

In deciding how to publicize participation activities, system staff must be aware of the various types of advertising available (and the type of audience reached) in the service area and the positive and negative aspects of each. The system should strive to receive as much exposure as possible.

The use of a media checklist should include at least the following questions:

- Have the types of media available in the service area for advertising the public participation process been investigated?
- Have the appropriate newspaper/TV/CCTV/radio staff members been encouraged to write or broadcast an article or report about the ADA complementary paratransit service?
- Have public service announcements been written?

SURVEYS OF RIDERS AND OTHER SERVICE PROVIDERS

Rider surveys typically collect opinions on service currently provided and proposed service changes. They can also be used to understand the transportation needs of the community, to collect such ridership information as who rides, where they go, and how often they travel; and, as importantly, information on those who do not use the system.

Surveys of other service providers are also useful. It is important to maintain a good working relationship with these agencies to coordinate service, if necessary.

The following steps are associated with the conduct of a successful survey:

- Defining goals and target respondents,
- Determining survey type and target number of respondents,
- Developing questionnaires,
- Pretesting and revising questionnaires,
- Distributing questionnaires,
- Ensuring adequate responses, and
- Tabulating, analyzing, and distributing results.

The goals of a rider survey should be to evaluate the quality of current services, conduct regular quality checks, pilot test materials and documents, evaluate possible service changes, and assess unmet demand and potential ridership. In contrast, the goals of a provider survey should be to assist with coordination efforts, identify other providers, define the nature of paratransit in the area, and estimate demand.

PERFORMANCE MONITORING

In monitoring performance, public participation plays a role in measuring how well the system is operating and the quality as perceived by the community. Each system needs this information. At the same time, independent measures of system performance and how well the system complies with ADA regulations are needed.

Performance can be monitored through information shared in outreach activities, information received during the consultation process, issues raised in the public hearing and public comment opportunity, interaction with the ongoing mechanism for public participation, and surveys of riders and service providers.

PLANNING PUBLIC PARTICIPATION PROCESS SCHEDULE

It is necessary to conduct outreach activities early so that people are made aware of the planning process and have a sufficient opportunity to participate. Consultation efforts can occur after outreach but also must take place during the early stages and throughout the planning process. The public hearing and public comment periods need to occur later in the process, after the draft plans are complete and after general consensus has been reached on issues related to the service. The ongoing mechanism must be active at all times with regular meetings or other activities.

The overall schedule should include outreach activities, consultation, advertisement and availability of the public comment period, development and advertisement of accessible formats, advertisement and conduct of the public hearing, development of the summary of significant issues, ongoing public participation mechanism, development of media relations, formal and informal surveys, and monitoring of performance.

Committing the overall scheduled activities to paper and a chart will allow everyone to know exactly what needs to be done and can be used as a tracking mechanism to guarantee that proposed activities actually occur.

CONCLUSIONS

It is important to recognize that the activities required by the ADA regulations can be fully performed. The important requirements of the regulations and the activities needed have been summarized.

Public participation should be encouraged and anticipated by transit staff professionals, those who currently ride the system, and those agencies involved in the transport of individuals with disabilities. Looking at the requirements not as necessary evils but rather as potential mechanisms for improving transit services should be the prevailing attitude.

ACKNOWLEDGMENTS

The KETRON Division of The Bionetics Corporation would like to thank Project ACTION, National Easter Seal Society, and FTA for the opportunity to develop the *ADA Public Participation Handbook,* which served as the basis for this paper.

Because of space limitations, example techniques for public participation were not included in this paper. Individuals interested in example techniques may acquire a copy of the *ADA Public Participation Handbook* from Project ACTION, 1350 New York Avenue, N.W., Suite 711, Washington, D.C. 20005, or from FTA, which funded the development of the handbook.

Robert Stout, Gary DeLorme, and Irv Chor of FTA were extremely helpful in the completion of the original handbook. Stout demonstrated keen insight by recognizing the need for the handbook and for interaction with Project ACTION and KETRON in its development. DeLorme provided expert advice and concern about the systems he oversees in FTA Regions 1, 2, 8, 9, and 10 along with the federal perspective on the challenges related to public participation. Chor complemented Delorme's role by providing expert advice and counsel on the systems he oversees in FTA Regions 3, 4, 5, 6, and 7. All three also provided careful reviews of the authored materials.

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Publication of this paper sponsored by Committee on Citizen Participation in Transportation.