To Commingle – or Not – That is the Question

TCRP Research Project B-34

Buffy Ellis, KFH Group, Inc.
Tom Procopio, TranSystems Corp.

TRB Rural Public and Intercity Bus Transportation Conference
October 25, 2010

Commingling???

"Routinely transporting ADA-eligible paratransit riders with 'other,'

non-ADA paratransit riders on the same vehicles at the same time."

TCRP Project B-34

- Funded through the Transit Cooperative Research Program (TCRP)
    - TranSystems Corp.
    - KFH Group
- Stated research objective:
    - To develop a guidebook to assist fixed-route public transportation providers in commingling ADA-eligible and other passengers on ADA-complementary paratransit services while maintaining ADA compliance.
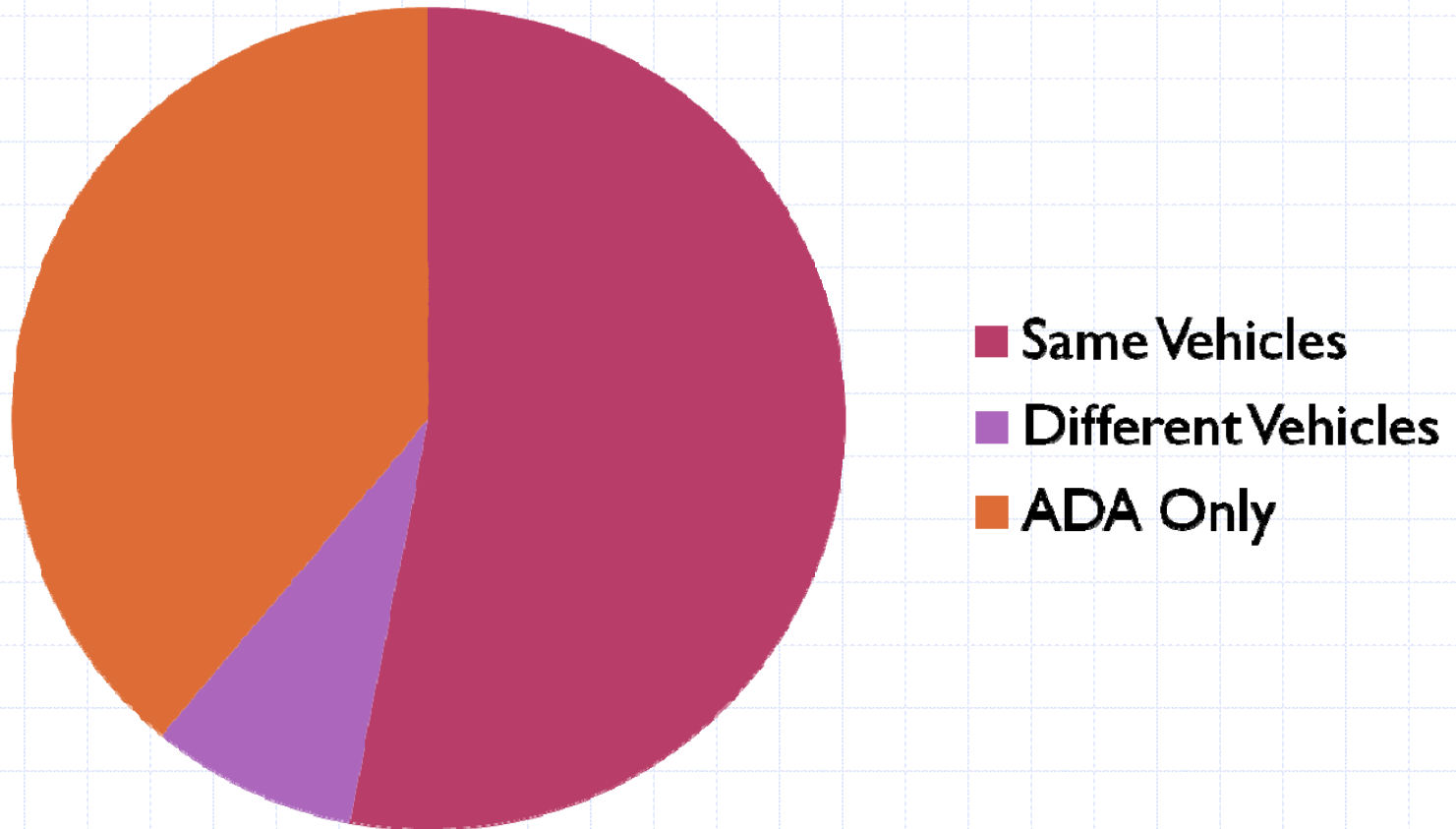
TCRP Project B-34: Major Components

- Literature review
- Survey of transit agencies
- Case studies (on-site and telephone)
- **Resource Guide for Commingling ADA and Non-ADA Paratransit Riders**
  - Planning Decision Flow Chart
  - Operations Decision Flow Chart

Survey Respondents – Service Area

Legend:
- <50,000
- 50,000-199,999
- 200,000-999,999
- 1,000,000+
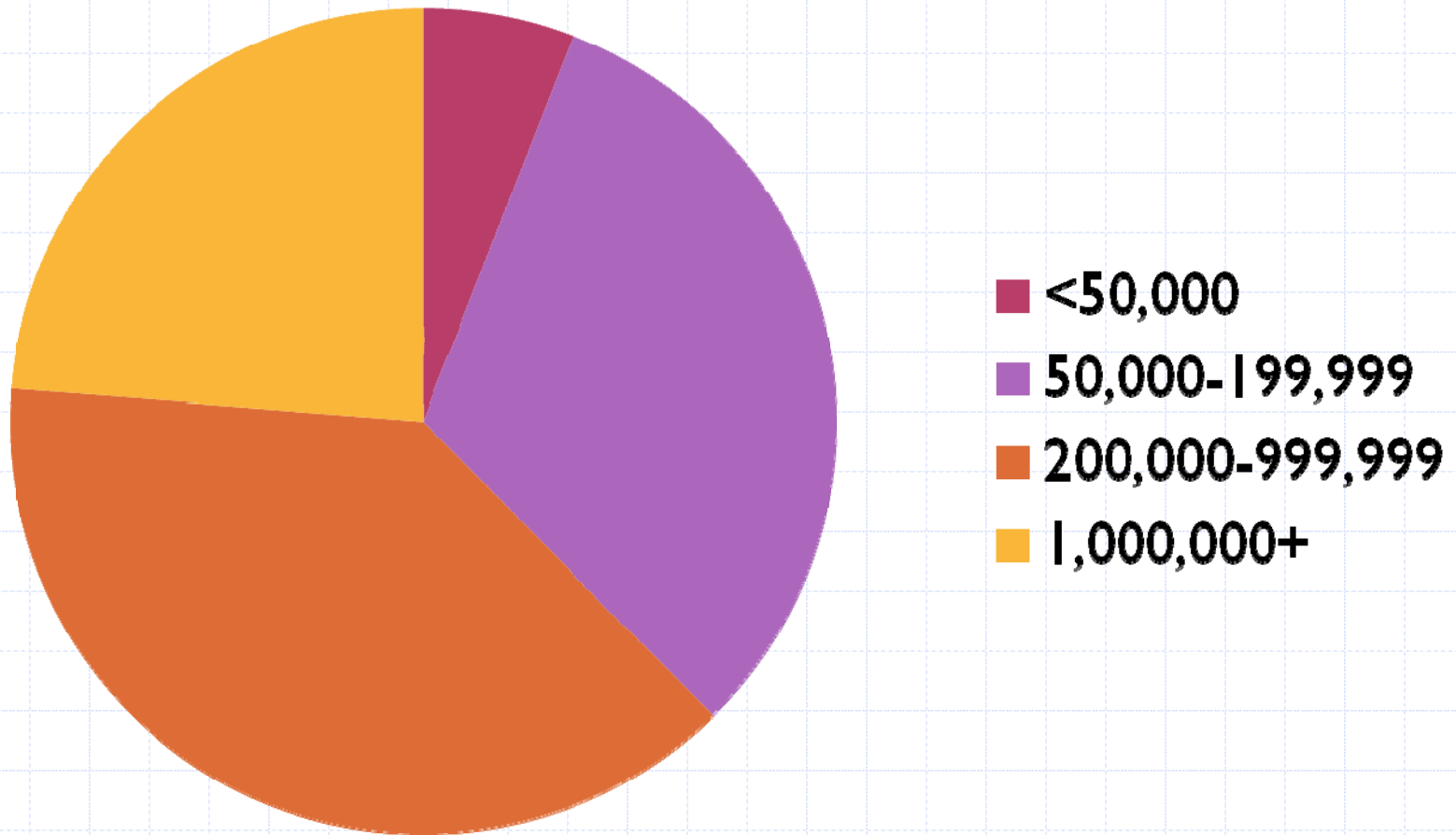
Paratransit Service Provided:
Does Agency Commingle?

- Same Vehicles
- Different Vehicles
- ADA Only

"Other" (Non-ADA) Riders

"Other" Paratransit Riders	"Other" on Same Vehicles N=63	"Other" on Different Vehicles N=9
Non-Sponsored Older Adults	60%	44%
Other Agency Funded	57%	22%
Non-Sponsored Persons with Disabilities	57%	33%
General Public	54%	67%
Medicaid	46%	11%
Title III	44%	0%
Non-Sponsored Low Income Persons	33%	22%
Head Start	10%	0%

Primary Factors Affecting Decisions on Commingling

- Evolution of paratransit service
- Cost-sharing opportunities
- State-level commitment to coordination

Commingling "Models"

- Model #1: HST + ADA Paratransit
- **Model #2: ADA Paratransit + HST**
- Model #3: General Public DAR + ADA
- Model #4: Two Tiered ADA Paratransit

Development of Guidance for Commingling

- Planning
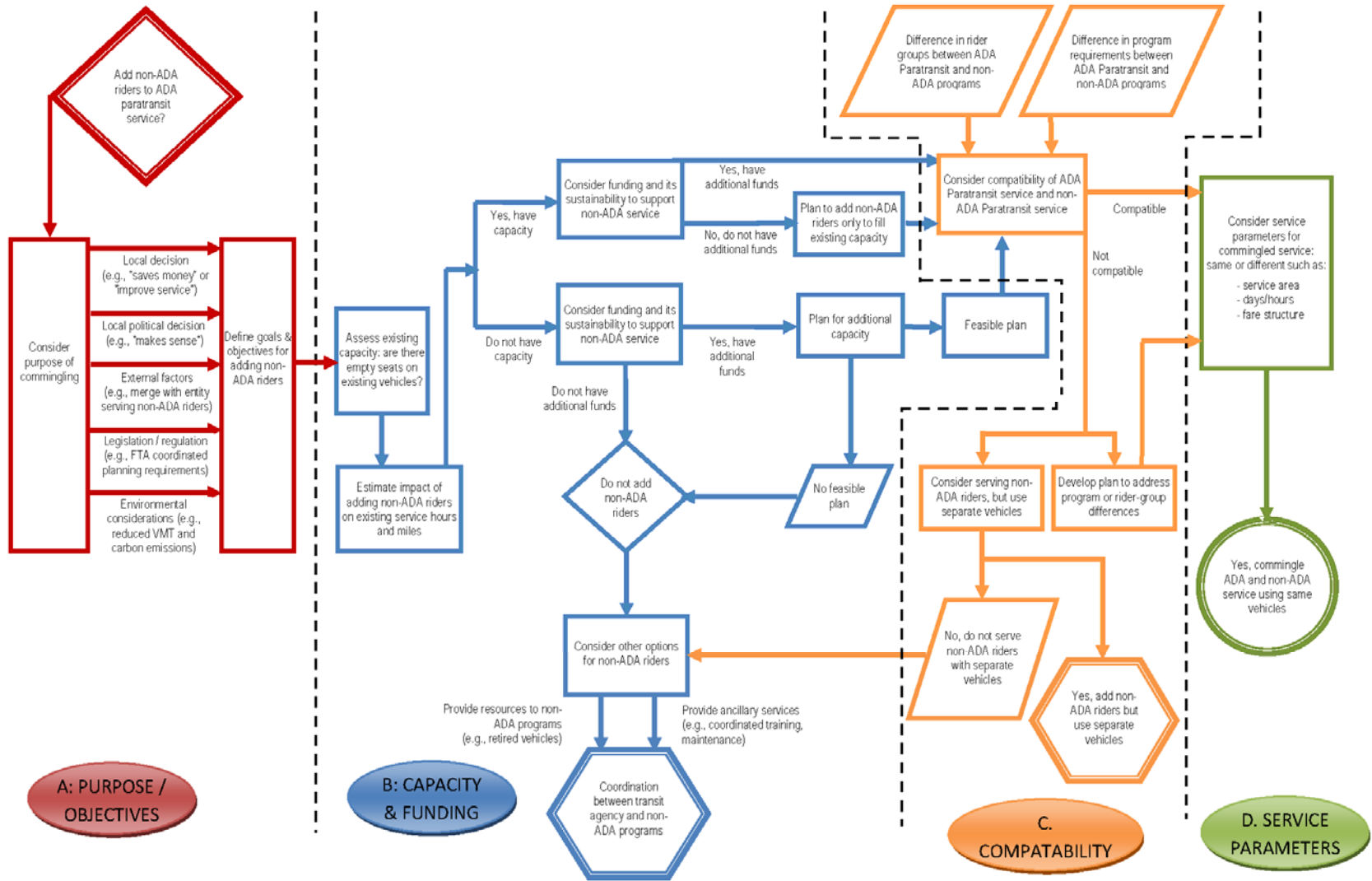

- Operations

Planning Decision Approach

A. Define purpose & objectives for commingling

B. Identify available capacity and funding

C. Evaluate service compatibility

D. Consider primary service parameters

A flowchart for deciding whether to add non-ADA riders to ADA paratransit service.

A: PURPOSE / OBJECTIVES
- Add non-ADA riders to ADA paratransit service?
- Consider purpose of commingling
  - Local decision (e.g., "saves money" or "improve service")
  - Local political decision (e.g., "makes sense")
  - External factors (e.g., merge with entity serving non-ADA riders)
  - Legislation / regulation (e.g., FTA coordinated planning requirements)
  - Environmental considerations (e.g., reduced VMT and carbon emissions)
- Define goals & objectives for adding non-ADA riders

B: CAPACITY & FUNDING
- Assess existing capacity: are there empty seats on existing vehicles?
  - Yes, have capacity → Consider funding and its sustainability to support non-ADA service
    - Yes, have additional funds → Consider compatibility
    - No, do not have additional funds → Plan to add non-ADA riders only to fill existing capacity
  - Do not have capacity → Consider funding and its sustainability to support non-ADA service
    - Yes, have additional funds → Plan for additional capacity → Feasible plan
    - Do not have additional funds → No feasible plan → Do not add non-ADA riders
  - Estimate impact of adding non-ADA riders on existing service hours and miles
- Do not add non-ADA riders → Consider other options for non-ADA riders
  - Provide resources to non-ADA programs (e.g., retired vehicles)
  - Provide ancillary services (e.g., coordinated training, maintenance)
  - Coordination between transit agency and non-ADA programs

C: COMPATABILITY
- Difference in rider groups between ADA Paratransit and non-ADA programs
- Difference in program requirements between ADA Paratransit and non-ADA programs
- Consider compatibility of ADA Paratransit service and non-ADA Paratransit service
  - Compatible → Consider service parameters
  - Not compatible
    - Consider serving non-ADA riders, but use separate vehicles
    - Develop plan to address program or rider-group differences
  - No, do not serve non-ADA riders with separate vehicles
  - Yes, add non-ADA riders but use separate vehicles

D: SERVICE PARAMETERS
- Consider service parameters for commingled service: same or different such as:
  - service area
  - days/hours
  - fare structure
- Yes, commingle ADA and non-ADA service using same vehicles

KFH GROUP

TranSystems
EXPERIENCE | Transportation

Planning Decision Approach

A. Define purpose & objectives for commingling

- Purpose?

- Coordination mandate?

- External forces?

- Political decision?

- Financial decision?

Planning Decision Approach (con't)

B. Identify available capacity and funding

- What is the existing capacity?

- What is the impact of adding riders?

- How will service be funded?

- Is service sustainable?

- Other options for non-ADA riders?

Planning Decision Approach (con't)

C. Evaluate service compatibility

- Different rider groups?

- Different service types?

Planning Decision Approach (con't)

D. Consider primary service parameters

- Are they the same or different?

- Should they be "blended"?

- Riders must understand any differences.

Operations Decision Approach

A. Establish passenger eligibility requirements

B. Develop operating and cost allocation policies and procedures

C. Identify reporting requirements and assess technology needs

D. Develop marketing/education and monitoring programs
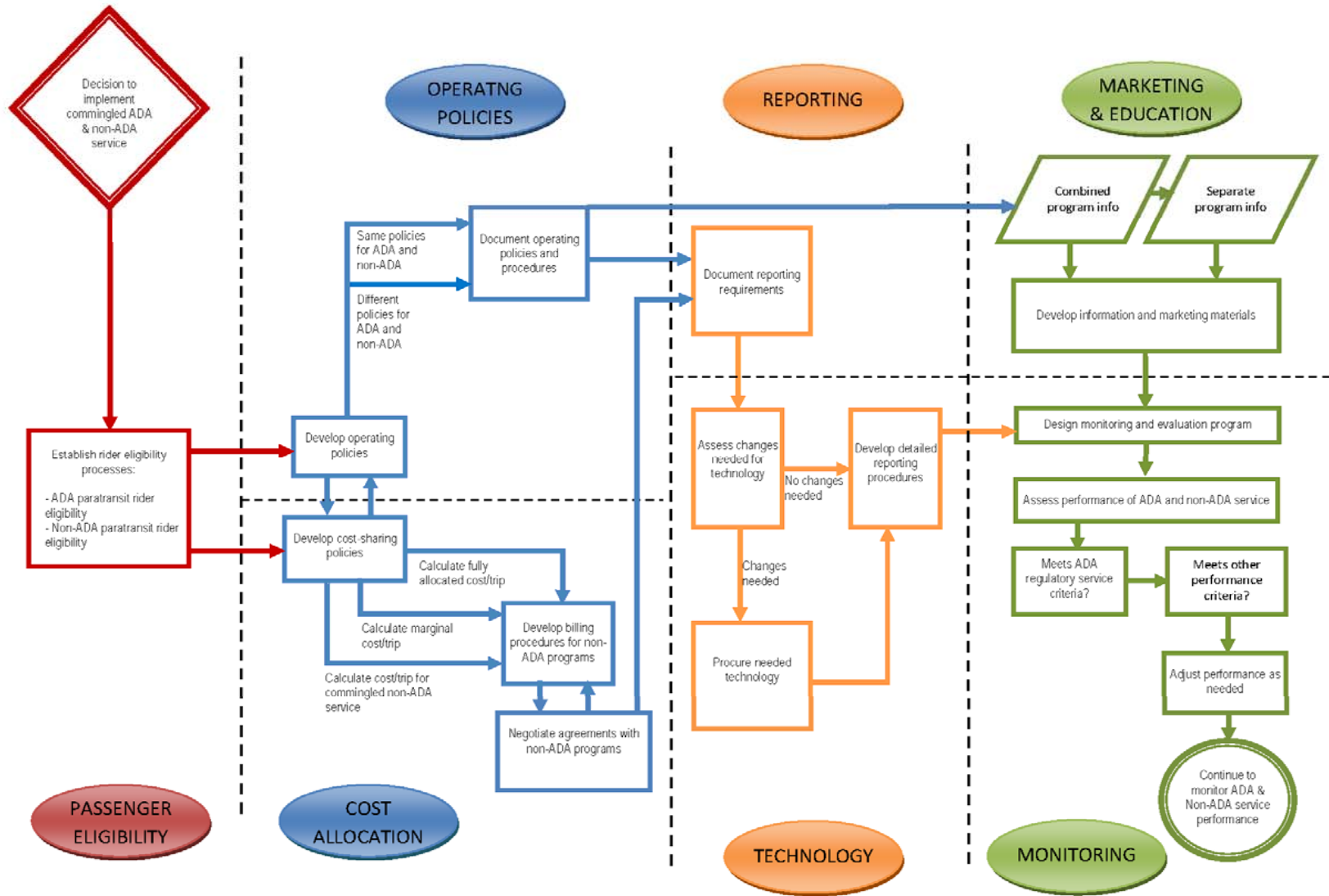
Operations Decision Approach

A. Establish passenger eligibility requirements

- ADA eligibility determination process

- Non-ADA eligibility requirements and processes

Operations Decision Approach **(con't)**

B.1 Develop operating policies and procedures

- Operating policies – ADA service requirements versus non-ADA service policies

Cost Allocation

B.2 Cost allocation based on a fair distribution of costs to negotiate agreements

- Cost analysis
  - How is the cost of service determined? (per mile, per hour, per trip)
  - Are the costs of non-ADA service being recovered?
  - Options if cost for service is not being recovered?

Case Study - Agency Cost Analysis

– Medicaid changed the method of reimbursing transportation costs

– Old method – reimburse actual costs

– New method – fixed dollar amount per month regardless of cost

– Outcome – county subsidized the Medicaid Non-Emergency Medical Transportation Program over a 2 year period

– Decision – county opts to stop providing Medicaid Non-Emergency Medical Transportation

Case Study – Agency Cost Analysis (con't)

Year	Cost for Service	Medicaid Reimbursement	County Subsidy
1995	$2,892,802	$2,892,802	
1996	$2,319,075	$2,319,075	
1997	$1,737,293	$1,737,293	
1998	$1,541,105	$1,541,105	
1999	$1,545,962	$1,545,962	
2000	$1,491,843	$1,491,843	
2001	$1,998,421	$1,998,421	
2002	$2,376,656	$2,376,656	
2003	$2,092,420	$2,092,420	
2004	$2,309,843	$2,309,843	
2005	$2,245,450	$2,003,431	-$242,019
2006	$2,216,281	$2,176,673	-$39,608

Operations Decision Approach (con't)

C. Identify reporting requirements and assess technology needs

- Paratransit reporting (what data needs to be reported?)

- Technology as a tool to enhance coordination

- Technology needs assessment

Operations Decision Approach **(con't)**

D. Develop marketing/education and monitoring program

- Marketing – riders, agencies, public

- Monitoring – overall and program specific

- Essential to meet ADA requirements

- Feedback

Lessons Learned

- There is no one right answer. A decision not to commingle is just as valid as a decision to commingle

- ADA paratransit service standards are often higher than non-ADA service standards. ADA paratransit service standards must always be met

- There is no such thing as a free ride

Lessons Learned (con't)

- Proper cost allocation is essential
- Some areas may find commingling to be inherently easier than others. State and local conditions matter
- Educate board members, transit agency staff and riders
- Determining rider eligibility is critical for managing demand

Lessons Learned (con't)

- Technology is a useful tool for needed ongoing performance monitoring
- Planning is key. However flexibility is needed to meet unanticipated contingencies