Metropolitan Transportation Commission

Review and Evaluation of Regional ADA Paratransit Eligibility Program

➢ Task 9: Recommended Improvements for Regional Program ➢

April 2003

Prepared by:
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Introduction

The purpose of this report is to present recommended improvements for the Regional ADA Paratransit Eligibility Program. This program was originally adopted in 1992 in response to the paratransit requirements of the Americans with Disabilities Act (ADA). All 21 transit operators in the San Francisco Bay Area responsible for the provision of ADA paratransit services participate in the regional program. MTC, on behalf of the operators, has initiated this project to evaluate the current process, and to recommend revisions to improve it.

These recommendations have emerged from Task 6 of this study, in which the consulting team presented a series of options for meeting the study’s goals for improving the effectiveness of the Regional Program, with actions that should be taken to achieve these goals. In the fall of 2002, these options were presented to a variety of stakeholders, including six Paratransit Coordinating Councils (PCCs), the working group established for this project, and the Partnership Transit Coordination Committee’s (PTCC) Accessibility Committee. Based on the public input process, some of the options under consideration have been eliminated and others modified. In this memorandum, the preferred alternatives are presented for each of the program elements discussed previously in the study. Task 9B will outline an implementation plan that will include estimated costs and implementation time lines. The final task of this project (Task 10) will result in the development of revised eligibility guidelines, screening tools, and other project documentation as described below.

The team also proposed a Quality Assurance Program, intended to monitor and evaluate the new program once it is implemented. This is described in the Task 7 memorandum, “Quality Assurance (QA) Program”, and is included as a recommendation for improving the overall program.

Summary of Final Recommendations

The current regional eligibility program was developed in response to regulatory requirements of the ADA. The ADA requires that transit operators make their fixed route buses, trains and key rail stations accessible and usable for persons with disabilities and, for persons whose disability prevents their use of (accessible) fixed route service, that complementary paratransit services also be provided. Regulations issued by the Department of Transportation provide specific guidance to operators in establishing an eligibility process for determining who should qualify for and receive ADA paratransit services. Within the Bay Area, all 21 transit operators agreed to adopt the same certification procedures, use the same application form, and to honor certification determinations by their fellow operators. This means that persons granted eligibility in one part of the region are entitled to receive paratransit services throughout the nine county Bay Area without having to reapply.
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The current program contains the key elements required to administer a cost-effective and accurate screening process. While the proposed recommendations retain the basic program components, further action is needed to meet the project goals of ensuring that the certification program is accurate, convenient for consumers, consistently applied by all participating operators, and is cost-effective to administer. These steps include providing greater guidance and training to program staff, and developing tools to support more comprehensive use of second-level assessments. The table below presents a summary of the key study recommendations.

<table>
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<th>Final Recommendations</th>
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<tbody>
<tr>
<td>Develop materials for educating potential applicants and/or their caretakers about the ADA certification process.</td>
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<td>Develop a bank of existing translated and accessible-formatted applications.</td>
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<td>Simplify the eligibility form.</td>
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<td>Develop an “Evaluation Summary” to help identify the exceptional cases in which second-level assessments are not necessary.</td>
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<td>Develop guidelines that will assist eligibility specialists identify appropriate second-level assessments (follow-up phone call, medical professional verification, in-person interview or functional assessment)</td>
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<td>Create a pool of contracted professionals to 1) provide specialized expertise in assisting with “gray-area” applications and 2) conduct appeals.</td>
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<td>Ensure that relevant certification decisions are consistently entered into the regional eligibility database (RED).</td>
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<td>Provide an option for transit agencies to indicate if an applicant’s eligibility is local non-ADA</td>
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<td>Provide guidelines for the implementation of trip-by-trip screening for conditionally eligible individuals.</td>
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<tr>
<td>Ensure that candidates are identified and educated about travel training and that travel training opportunities are integrated into the screening process.</td>
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<td>Develop a training curriculum and implement a regional training program for eligibility staff</td>
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<td>Incorporate respective guidelines and new written procedures into the ADA Eligibility Manual.</td>
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<td>Create a streamlined recertification process for registrants for whom it is appropriate.</td>
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<tr>
<td>Initiate a Quality Assurance (QA) Program</td>
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Study Findings

Based on the extensive public input described in the introduction, consensus on the study’s recommendations has been achieved. However, a number of key themes emerged
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as improvements desired by participants from the disability community and transit agencies.

Consumer Concerns and Suggestions:

- Before revising the process, establish the degree to which consumers are being found eligible even when they should not be
- An expedited recertification process is important
- Second-level screenings, including transportation to screening sites, could be costly to the operators
- Transportation to the screening sites could be physically challenging for some applicants
- Individual professionals may not be able to accurately verify an applicant’s ability to use transit, especially since professionals often do not see the “whole picture” of a person’s disabilities
- Functional assessments may not be implemented in a sensitive manner, and professionals may not be able to identify hidden disabilities
- The current application form is too long, questions are repetitive, the forms are difficult to read and navigate, and the questions may be misunderstood

Transit Agencies’ Concerns and Suggestions:

- There is a need to ensure the screening process is accurate and reflects the high threshold for eligibility (paratransit as “safety net”) established in the ADA
- Increased training of screeners is critical, particularly in smaller agencies where there is less peer support
- Operators should be encouraged to use a variety of screening methods - the process should result in a consistent and clear understanding among all the operators on how best to conduct the process
- More emphasis should be placed on 2nd level screening in order to develop a more comprehensive approach to making certification decisions
- Streamlined recertification should be implemented once a higher threshold of confidence in the accuracy of the process is established

Many of the transit operators’ comments reflect their growing concern of escalating costs to provide ADA paratransit services. A recently published report by

Key Findings of the State of the Region 2002 Report

- Paratransit expenditures are significantly increasing in order to keep pace with additional demand, and system efficiencies continue to decline.
- Over the past six years, expenditures have doubled, reaching a projected $101 million in FY 2002-2003.
- Trip increases have averaged 8.4% per year during this period, reaching over four million trips in the current fiscal year.
- The average cost per trip has grown from $18.29 to over $24 in the past six years.
- The number of ADA-eligible registrants is projected to increase from the current level of 100,000 to 160,000 by 2020.
MTC, titled “State of the Region 2002: Status of San Francisco Bay Area Paratransit Programs,” documents expenditure trends faced by Bay Area operators over the past six years. As a result, operators are exploring a number of methods to curtail costs and improve efficiencies. One important strategy is to implement recommended revisions to the certification process to ensure that only persons who are truly ADA eligible are actually certified.

**Recommended Program Improvements**

Most stakeholders in the input process expressed broad support for many of the options presented in Task 6. As a result, many of the recommended actions presented below will be familiar to those involved in the process thus far. There are, however, a number of changes that have been made directly in response to stakeholder comments. These are discussed briefly before the recommended improvement in each of the program elements.

**Eligibility Screening Methods**

*Pre-screening/Education*

Some stakeholders were concerned that an additional step requiring a pre-screening process – such as a postcard - would make the process overly cumbersome, depend too heavily on consumer self-selection, deter or discourage eligible persons from applying, and result in lengthy time delays. As a result, this step is not included as a requirement. Rather, the revised process emphasizes pre-screening as an educational tool, in order to better inform potential applicants and/or their caretakers about the program.

**Recommendation:** Develop materials for educating applicants and/or their caretakers about the ADA eligibility process, with an emphasis on telephone contact at the time of the initial application request. This will be an opportunity to help the interested party decide if s/he qualifies for ADA paratransit services. It is also an opportunity to educate applicants of alternative transportation options in the community, e.g. fixed route accessible services.

**Specific Actions:**

- Provide guidelines for pre-screening applicants by telephone. The guidelines should clearly explain for whom ADA paratransit services are intended, and should also explain that paratransit service may be available for some trip requests, but not all. The guidelines should use key phrases such as “civil right”, “safety net”, “unable to ride buses or trains”, “some or all of the time.” These telephone conversations should avoid lengthy discussions about the individual’s specific disability, but rather serve as an opportunity to clarify the role of ADA paratransit.
- Develop brochures, videos, website information or other materials to explain the intent of ADA paratransit services, and other accessible options in the community. A “What is ADA Paratransit?” brochure should describe the “safety net” intent of ADA paratransit and the regional eligibility process.
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**Assistance to Applicants**

Transit agencies are encouraged to identify resources in their own communities for providing assistance to applicants who may need help with the process, especially with translation services. This will be particularly important in communities where telephone interviews are routinely used as second-level assessments.

**Recommendation:** Identify local “consumer assistants” to help applicants fill out application forms, guide the applicant through the certification process, and provide translation services as needed.

**Specific Actions:**

- Identify the entities that could be contacted to provide assistance to applicants.
- Ensure that the public is informed about the availability of this assistance, whether directly or through referrals to other agencies or resources.
- All forms of the eligibility application will be housed in one location and made available to all transit operators. Translated applications will be collected from transit operators. Applications in accessible formats - such as Braille, large print, and audio tape – will be provided by MTC.

**Revise Application Form**

The application form will be retained as part of the process, but simplified in response to many comments received from consumers and transit agency staff alike. The revised application form should strive to maintain brevity and reduce redundancies, without compromising the need for gathering sufficient information for a first level assessment.

**Recommendation:** Simplify the eligibility form while retaining the needed level of redundancy.

**Improve and Increase the Use of Second-Level Assessment Methods**

A new step will be introduced into the process once the application form is received and initially reviewed. An “Evaluation Summary Report”, to be completed by the certification staff, will focus on the applicant’s functional capabilities of using fixed route transit (e.g. ability to climb the stairs of a bus, the ability to maintain balance on a moving bus, the ability to walk to a bus stop or rail station, etc.). This requirement should not be seen as so rigid that the screener is prevented from making clarifying telephone calls before completing the report. While the process assumes that in most cases the evaluation screener will be required to conduct some form of second level assessment, there will be exceptional cases in which a determination can be made based on the paper application alone. The purpose of the report is twofold: to provide guidance about the type of second-level assessment to be selected, and to identify those cases in which a second-level assessment is not required.
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**Recommendation:** Initiate an “Evaluation Summary Report” as part of the certification process, and require second-level assessments to be conducted in all cases when a decision cannot be made based on the application alone. Second-level assessment methods include:

- Conducting an interview with the applicant or the applicant’s caretaker by telephone;
- Sending customized fax forms or consulting directly with informed professionals (such as a physician, physical therapist, occupational therapist, etc.) who could assist in providing more information regarding the applicant’s ability (or inability) to use fixed route transit;
- Conducting an in-person interview with the applicant (in a small number of cases this can be conducted by a contracted professional), and/or
- Conducting a functional assessment of the applicant to observe or better ascertain the applicant’s functional ability to use fixed route transit services.

Steps to increase the use of second-level assessments include:

1) Require all participating operators to use an Evaluation Summary Report that will contain a series of multiple-choice questions regarding the applicant’s ability to ride fixed-route transit. If the answers to all questions clearly and definitively indicate an inability to ride fixed-route, then the applicant should be granted eligibility. In all other instances, the agency would be required to conduct a second-level assessment. The report would not apply to those operators that have chosen to conduct second-level assessments for all applicants;

2) Provide greater support for program staff through the development of guidelines and protocols as well as training activities related to implementation of second-level assessments;

3) Require all agencies to enter eligibility outcomes in the regional eligibility database consistent with categories and definitions agreed to by the operators. Conditional eligibility determinations should also provide sufficient detail for a reservationist to make a trip-specific determination.

**Specific Actions:**

- Provide examples that will assist screeners in determining which form of second-level assessment is most appropriate for each applicant
- Develop guidelines, procedures and instructional materials as needed to implement all forms of second-level assessments
- Ensure training program includes specific instructions and offers techniques to effectively implement second-level assessments.
Support For Screening Methods

Training Program for Eligibility Screeners

Most stakeholders were supportive of increased training of eligibility screeners. The key challenges to improving this element are training costs, time availability and convenience. In addition, it is important to develop a meaningful and relevant training curriculum, and to identify instructors to conduct the training.

Recommendation: Develop a training curriculum, and implement a regional training program for eligibility staff. The program would require initial training sessions for new screeners, as well as on-going training sessions to enhance the skills of practicing screeners.

Specific Actions:

Establish and implement a regional training program to include the following components:

- **Initial Training Sessions**: Standards for initial training will include both the number of hours and the topics to be addressed. Training should be a minimum of 20 hours, and may take place over several days. At a minimum, up-front staff training will address all of the following elements:
  - Overview of the transportation provisions of the ADA and applicable federal regulatory requirements.
  - Measurable and perceived accessibility of local fixed route services and local travel environments.
  - Understanding of and sensitivity to various disabling conditions and how they impact the ability to use fixed-route transit.
  - Detailed coverage of each element of the regional eligibility process.

- **On-Going Training Sessions**: Implement training sessions on a quarterly or other appropriate basis to enhance the skills of eligibility screeners. Quarterly sessions typically require one-half to one full working day. Sessions may be implemented in conjunction with peer collaboration strategies described in the next section. Such on-going training can be devised in a manner to enhance teamwork across the region and may consist of some or all of the following components:
  - Annual conferences for eligibility staff from each operator across the region.
  - Periodic meetings with staff from two or more local operators of similar size.
  - Refresher training programs addressing specific issues that can be more easily planned and conducted to include some or all local providers than on a regional basis.
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- Regular opportunities to analyze program outcomes and provide meaningful feedback, guidance and corrective measures as needed.

Peer Collaboration

Transit agencies, particularly those serving more rural areas, were supportive of the concept of establishing greater peer support for screeners.

Recommendation: Develop a forum for Bay Area certification and/or other paratransit program staff to share their experiences and knowledge, and to reinforce formal training sessions.

Specific Actions:

- Establish a schedule for periodic meetings of certification staff. This could coincide with the training sessions.
- Compile a list of the names, telephone numbers and e-mail addresses of all staff willing to respond to individual telephone or e-mail requests from other screeners at peer systems. Create a listserv for eligibility screeners who are willing to participate in discussions regarding gray-area applications.

Contracting with Specialized Professionals

1. Assistance with Eligibility Determination

Contracted professionals will not be asked to make certification decisions; rather, they will be considered as resources to assist certification specialists make an accurate eligibility determination.

Recommendation: Contract with professionals qualified to provide specialized expertise in “gray-area” applications. These could include professionals with expertise in visual and cognitive disabilities, or other areas such as epilepsy, and other “hidden” disabilities. It should be emphasized that for certain disabilities, particularly for those with psychiatric or mental health issues, the screener should consult with a professional who is familiar with the applicant. Eligibility screeners, particularly those who are working solo and could benefit from the specialized expertise, could refer the applicant to one of the experts for an in-person assessment.

Specific Actions:

- Determine the type of professional skill sets required for the relevant categories of gray-area applications.
- Establish the market salary rate for these professionals.
- Recruit, interview and negotiate agreements with professionals in one county on a pilot basis.
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2. Appeals Process

The second function for which the pool of professionals will be contracted is to conduct appeals. In contrast to the current appeals panel model, a roster of professionals who can conduct assessments with appellants on a one-on-one basis will be created. A checklist of elements to include in the appeals process should also be developed.

**Recommendation:** Establish contracts with a roster of professionals who will conduct individual appeals hearings. Professionals best qualified to understand and evaluate the functional implications of various conditions might include the following types of specialists:

For persons with Physical Disabilities:

- Medical doctors
- Physical Therapists
- Occupational Therapists
- Rehabilitation Specialists

For persons with Cognitive Disabilities:

- Licensed Clinical Psychologists
- Licensed Clinical Social Workers
- Independent Living Center Specialists

For persons with Psychiatric/Mental Health Issues:

- Licensed Psychiatrist
- Licensed Clinical Psychologist

For persons with Visual Disabilities:

-Orientation and Mobility Specialists
- Credentialed VH Teachers

**Specific Actions:**

- Develop an appeals training program to ensure that appeals professionals receive quality training in how to conduct an appeals process, and how to arrive at decisions in the most effective manner possible.

Monitor the appeals outcomes at all Bay Area agencies to determine if there are any patterns in the number of initial determinations that get overturned at the appeals level.
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This can help identify eligibility screeners who need further assistance, or point to the need for additional training of appeals panelists.

It should be emphasized that, in order to comply with the ADA requirement that those conducting appeals may not be involved in the original determination, two pools of professionals will need to be created to serve these two distinct functions. If this proves impractical, the use of the professional pool for appeals - rather than to provide advice – is recommended.

Other Improvements

Streamline Recertification Process

Both community and transit representatives were supportive of the concept of a streamlined recertification process for persons whose status is not expected to change. However, transit agency staff emphasized that this process should be implemented once there is improved confidence in the accuracy of the revised process, in order to avoid “grandparenting” registrants who may not be ADA-eligible.

Recommendation: Create a streamlined recertification process for registrants whose ability to use transit is not expected to change over time. This should only be implemented after the PTCC Accessibility Committee has reached consensus that the revised screening process has achieved a greater level of accuracy.

Specific Actions:

- Develop guidelines for determining when the regional screening process is deemed sufficiently accurate that streamlined recertification can be implemented.
- Provide guidelines for determining which applicants are eligible for a streamlined recertification process. This process would entail updating contact information and other basic information but would omit the full screening component. A notation could be made in an individual’s file at the time of the eligibility determination indicating whether he or she would be required to go through full recertification or a streamlined process. Alternatively, prior to the termination of the three year certification period, the screener could evaluate whether the registrant should be subject to a full recertification or not, depending on factors such as change in registrant’s address, use of different mobility aides, or changes in the fixed-route system.

Distinguish Between Local and Regional Determinations

In some counties, transit agencies have implemented or plan to implement an eligibility process more liberal than that required of the ADA. In order to ensure that only those who are ADA-eligible are able to use paratransit in other counties, a separate designation of eligibility will be needed in the RED.
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**Recommendation:** Ensure that the RED includes a local field that allows transit agencies to indicate if an applicant’s eligibility is limited to non-ADA local service, or whether the individual has been certified as ADA-eligible under the regional program. This will enable those agencies that wish to provide service above and beyond the ADA requirements to do so without having to create a separate database, while still ensuring that the individual will not be allowed to travel on other ADA paratransit programs.

**Specific Actions:**

- Clarify the difference between the two types of service – while the eligibility screening may be stricter for those who are ADA-eligible, there may be a higher level of service provided on a local level in a specific system than in other systems.
- Provide input into the final redesign of the RED.

*Conditional Eligibility and Trip Screening*

By definition, persons certified conditionally eligible are able to take at least some of their trips on fixed route service. To date, however, local transit agencies are not implementing trip-by-trip eligibility for persons who are conditionally eligible. It is recommended that the certification process be designed to provide as much specific information as possible to enable reservationists to begin implementing trip-by-trip eligibility for persons with conditional eligibility status. For example, a person determined conditionally eligible may be entitled to paratransit services for night-time trips only, trips limited to specific seasons, or trips to destinations that have not been included in an individual’s mobility training.

It is essential that the determination letter - and the information in the clients’ files - state all the barriers that prevent use of transit. This is to avoid a situation in which a rider is denied a trip because circumstances specific to a particular trip are overlooked. For example, a low-vision individual may have been travel-trained for a particular route and is able to travel that route during the day-time, but not at night. The reservationist might deny a night-time trip on this particular route because the night-time limitation was not specifically noted.

**Recommendation:** Provide guidelines for implementing trip-by-trip screening for conditionally eligible individuals. As part of a pilot project, establish whether training reservationists how to make a determination on a specific trip request is effective. Due to high staff turnover among reservationists, training trainers at each system may be the most effective approach.

**Specific Actions:**

- Provide uniform guidelines to phase in implementation of trip-by-trip eligibility. The guidelines should minimize the amount of decision-making required at the time a trip is requested, and should provide clear and detailed guidance in the
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client files for the reservationists receiving trip requests from conditionally eligible individuals.

- Provide guidance on trip categories that are most cost effective or most easily implemented for initial implementation of trip screening, such as dialysis, trips requiring transfers, and distance from a transit stop.

- Provide guidance on how to initiate an Environmental Assessment - in which a staff person assesses the presence of architectural barriers along paths of travel in commonly recurring trips - and how this can be used to determine trip eligibility.

- Provide sample language that can be included in the communication to conditionally eligible registrants clearly indicating the limitations of their eligibility.

**Travel Training**

Although some transit stakeholders in the public input process were skeptical about the effectiveness of travel training programs, examples of successful programs do exist in other cities.

**Recommendation:** Ensure that travel training opportunities are well-integrated in the regional eligibility screening process by incorporating appropriate language in the screening forms and requiring transit agencies to either provide the training in-house or contracting with an outside agency. Provide assistance that will ensure that the travel training programs available throughout the Bay Area use the most effective approaches adopted in other systems.

**Specific Actions:**

- Ensure that the screening process effectively identifies potential candidates for travel training.

- Identify the elements in successful travel training programs that could be replicated in the Bay Area.

- Determine the extent to which these programs should be decentralized throughout the region, i.e., would it be practical to provide training at four sub-regional locations?

- Provide travel training models and protocols that can be adapted for local use by a paratransit program, including small programs with limited resources.

- Provide financial assistance to transit agencies that create comprehensive travel training programs.
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**Manual Revisions**

While most transit staff indicated that the existing *ADA Paratransit Eligibility Manual* is fairly effective in providing guidance to screeners, particularly new screeners, a number of elements would need to be revised to reflect changes resulting from this evaluation.

**Recommendation:** Revise the manual to reflect program changes, including guidelines for conducting interviews, procedures for determining second-level assessment, etc.

**Specific Actions:**

- Make modifications to the manual to reflect proposed revisions, such as requirements for second-level assessments, revised application form, and steps to improve trip-by-trip screening.

**Implement a Quality Assurance (QA) Program**

**Recommendation:** Refine the Quality Assurance (QA) Program presented in Task 7 to reflect final recommendations in the revised program. The goal of the program will be to ensure that the recommended improvements achieve the results set out at the beginning of the study, and that they are applied consistently and accurately across the region.

**Specific Actions:**

- Review data on eligibility outcomes prior to implementation of the new process and determine the trends
- Monitor timeline for the application process
- Document perceptions of applicants, potential applicants, and transit staff
- Examine impact of recertification process on eligibility outcomes
- Implement an auditing function

**Cost Implications**

While the short-term costs of implementing a more rigorous certification process are likely to result in increased program costs, it is anticipated that these expenses will be more than offset by the cost savings resulting from more accurate eligibility determinations. The cost of implementing some of the proposed recommendations is minimal, while implementing others will require new or additional resources. Where possible, specific costs associated with each of these recommendations will be provided in the next task.

Those recommendations that are not expected to result in significant new costs include:

- Improving educational and pre-screening methods with potential applicants;
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- Developing an “Evaluation Summary Report” as part of the certification process
- Developing a streamlined recertification process for some applicants
- Revising the RED.

Those recommendations that are expected to result in more significant cost include:

- Developing a travel training program;
- Revising and reprinting the application form and manual;
- Increasing the number of second-level assessments that are conducted (which may include providing transportation for an in-person interview or functional assessment in some cases);
- Contracting with professional experts to assist in second-level assessments and conducting appeals

Second-level Assessments

The most significant cost to implementing program revisions is expected to be in the increased number of second-level assessments, particularly in-person assessments. Currently, the average cost for screening applications in the Bay Area is about $50 per application. Based on the Peer Review and paratransit costs in the Bay Area, the cost of conducting in-person assessments, including transportation, could exceed $100 per application, or more than twice the current cost.

As stated previously, the likely increase in cost per assessments resulting from the introduction of the in-person assessment model will almost certainly be offset by the substantial long-term savings resulting from more accurate assessments. Task 5 presented a table illustrating the economic tradeoffs of different screening models for a fictitious transit system. This table suggested that in-person screening could lead to significant cost savings over time, with additional savings that can be realized through trip-by-trip screening. For example, Los Angeles, CA and Eugene, OR report cost savings averaging $7,000 to $8,000 range per active rider per year who shifts from using paratransit to fixed-route service.

Professional Appeals Hearings

Access Services Inc. (ASI), the paratransit program for Los Angeles County, retains a team of physical therapists, orientation and mobility specialists, and a psychologist for its appeals process. ASI reports that the cost per appeal ranges from $85 to $400 (the highest rate is used in very rare instances for appeals based on cognitive disabilities.) A comparison of the costs of using professionals versus volunteer appeals panels should consider staff costs for recruiting appeals panelists and scheduling meetings, and the lower level of accuracy that may result from volunteer appeal panels.
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Recommended Program Improvements Summary

The matrix below summarizes the recommendations included in this memorandum. Greater detail on how these elements will be implemented will be provided in the next task of this study.
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### Recommended Improvements to the Regional ADA Paratransit Eligibility Program

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<th><strong>Eligibility Screening Methods</strong></th>
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<td><strong>Pre-Screening/Education</strong></td>
<td>Develop tools to provide improved education regarding the ADA paratransit certification process (especially via telephone) during initial contact with potential applicant and/or caretaker.</td>
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<td><strong>Assistance to Applicants</strong></td>
<td>Develop a bank of existing translated and accessible-formatted applications. Transit operators will refer applicants to local resources (either in-house or outside agencies) that can assist them in filling out the application form.</td>
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<td><strong>Application Form</strong></td>
<td>Clarify and improve questions and simplify form.</td>
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<td><strong>Second-Level Assessments, including in-person and telephone interviews, customized faxes and functional assessment</strong></td>
<td>Create Evaluation Summary to help identify the exceptional cases in which second-level assessments are not necessary. Provide guidelines to assist certification staff determine which form of second-level assessment is most appropriate Provide guidelines and establish protocol for conducting second-level assessments</td>
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<tr>
<td><strong>Contracting with Professionals for Screening Assistance</strong></td>
<td>Establish contracts with specialized professions for screeners to contact if assistance is needed in determining the eligibility status in “gray area” cases.</td>
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<td><strong>Training for Eligibility Screeners</strong></td>
<td>Provide regular trainings for new screeners and on-going training sessions focused on second-level assessment techniques. Include curriculum on interviewing techniques and protocols and conducting second-level assessments (interviews, functional assessments, etc.)</td>
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<tr>
<td><strong>Peer Collaboration</strong></td>
<td>Establish lists of screeners willing to discuss applications on the telephone or via email, as well as listservs to allow for greater peer collaboration.</td>
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### Other Improvements

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<tr>
<td>Update RED to incorporate revised changes.</td>
<td>Ensure RED contains field to allow operators to determine if an applicant receives local (non-ADA) paratransit services only.</td>
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<tr>
<td>Conditional Eligibility – Trip Screening</td>
<td>Provide guidelines for the implementation of trip-by-trip screening for conditionally eligible individuals. Ensure that information provided in the screening process is sufficiently detailed to enable reservationists to make trip-screening decisions.</td>
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<tr>
<td>Travel Training</td>
<td>Include sufficient information in application process to assist in identifying candidates for travel training. Provide guidance in training to encourage screeners to explore this option with appropriate candidates in a productive manner.</td>
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<tr>
<td>Manual Revisions</td>
<td>Revise manual to include new guidelines and complete documentation on revised regional ADA eligibility program.</td>
</tr>
<tr>
<td>Streamline Recertification Process</td>
<td>Create a streamlined recertification process for registrants for whom it is appropriate.</td>
</tr>
<tr>
<td>Appeals</td>
<td>Establish contracts with specialized professionals who will conduct appeals on a one-on-one basis Monitor appeals outcomes to ensure eligibility screenings are being conducted effectively and not resulting in substantial number of changes to initial determinations.</td>
</tr>
</tbody>
</table>