

Metropolitan Council Response

to

FTA Paratransit Compliance Review Final Report

Dated March 17, 2014

and

Received on April 9, 2014

Section	Corrective Action Schedule	Metropolitan Council Response	Person Responsible/ Completion Date
<i>Section 5.3 Determinations of Presumptive Eligibility within 21 Days</i>	<i>Within 60 days of the issuance of the final report, Met Council must revise its Metro Mobility application form and instructions to explain applicants' right to service on the 22nd day if they have not received an eligibility determination within 21 days.</i>	The Metropolitan Council has updated the online version of the instruction form with the language "If your properly completed and submitted application is not processed within 21 days, you will be granted presumptive eligibility for Metro Mobility Service until your application is processed. The Metropolitan Council has printed new instruction forms with the revised language.	Andrew Krueger Senior Manager , Metro Mobility Complete- See attachment 5.3.1
<i>Section 5.3 Administrative Appeal Process for Denials or Decisions Granting Conditional or Temporary Eligibility</i>	<i>Within 60 days of issuing the final report, Met Council must no longer require appellants to submit written statements describing reasons for their appeals.</i>	<ol style="list-style-type: none">1. The Council has modified the denial notification removing the requirement to submit reasons for an appeal.2. The Council will require that all applicants come in for an in person assessment <u>prior</u> to being denied ADA Certification.3. The Council has revised its appeal decision letters and forms to include specific reasons for denying appeals.	Andrew Krueger Senior Manager, Metro Mobility Complete- See attachment 5.3.2

<p><i>Section 5.3 Complementary Paratransit for Visitors</i></p>	<p><i>Within 60 days of the issuance of the final report, Met Council must revise its policy and procedures regarding visitors to accept requests for visitor eligibility from who indicate an apparent disability when making such requests, regardless of whether they are certified as ADA paratransit eligible.</i></p> <p>Met Council must revise its documentation requirements for ADA paratransit eligible visitors to accept documentation directly from visitors as opposed to requesting documentation from a visitor's home transit agency.</p>	<p>The Council already accepts, and will continue to accept, written claims from visitors of an "apparent" disability regardless of whether they are certified as ADA paratransit eligible. The Service Guide language on page 15 will be modified to more accurately describe the Council's current practice.</p> <p>The Council already accepts documentation directly from visitors and only contacts the local transit agency at the visitor's request. The on-line Service Guide language on page 15 will be modified to more accurately describe the Council's current practice by July 1, 2014 and an insert will be put into the printed guide highlighting the change. A completely revised service guide will be printed in the first quarter of 2015.</p>	<p>Andrew Krueger, Senior Manager Metro Mobility</p> <p>July 1, 2014</p>
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<p><i>Section 5.5 Response Time</i></p>	<p><i>Within 60 days of the issuance of the final report, Met Council must require Scott County, Anoka County, and DARTS to accept (at a minimum) trip reservations during the normal business hours (i.e., until at least p.m. every day). Met Council must modify its contracts with these service providers to reflect this requirement. In addition, Met Council must ensure that all public information (service guides, websites, etc.) reflects the corrected hours for making reservations with all service providers.</i></p>	<p>The Council will change the trip reservation hours in Scott County, Anoka County and Dakota County on July 1, 2014 to match the core providers (Transit Team and First Transit). All three contracts will be modified to reflect the new requirements. The Met Council will ensure that all public information is updated to reflect the new reservation hours in Scott County, Anoka County and Dakota County.</p>	<p>Andrew Krueger Senior Manager Metro Mobility July 1, 2014</p>
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<p><i>Section 5.5 Fares</i></p>	<p><i>Within 60 days of the issuance of the final report, Met Council must revise its Metro Mobility fares to not exceed twice the fares for all comparable fixed route trips in the service area, including trips with origins and destinations within its reduced-fare and free-fare zones.</i></p>	<p>The Council implemented the Downtown Zone fare of \$1.00 for Metro Mobility on April 1, 2014.</p> <p>The Council will implement a free fare zone to correspond to the Nicollet Mall free fare service on Regular Route effective September 1st, 2014. Because there are multiple fixed routes which run parallel to Nicollet Mall on Hennepin (Routes 4,6,12, and 61), 4th Avenue (Route 22) and 5th Avenue (Routes 14,20, and 22) the Council proposes that the free zone which is serving a limited corridor around Nicollet Avenue. Washington Avenue (where Nicollet mall terminates) will serve as the northern boundary. The free zone will extend west to Hennepin Ave. and follow Hennepin down to 8th St. S. As Hennepin Avenue angles away from a parallel track with Nicollet mall, the boundary will move east to Lassalle Ave. The Southern boundary will be 15th/16th St East. The Eastern boundary will be 3rd Ave S. This area provides a geographic area most likely to serve as a comparable collector zone for the Nicollet Avenue regular route service. See attachment 5.5.1</p>	<p>Andrew Krueger Senior Manager Metro Mobility</p> <p>Downtown Zone fare completed April 1, 2014</p> <p>Nicollet Mall free fare zone September 1, 2014</p>
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<p><i>Section 5.6 No Substantial Numbers of Trips with Excessive Trip Lengths</i></p>	<p><i>Within 60 days of the issuance of the final report, Met Council must develop and implement procedures to: identify Metro Mobility trips of excessive length; ensure that riders do not experience a substantial number of trips with excessive trip length; monitor trips lengths and eliminate any such patterns.</i></p> <p><i>Met Council must establish a trip-length standard based on the length of comparable fixed route trips (e.g., “Metro Mobility trips should not exceed the length of the comparable fixed route trip”). Met Council may include walking time to and from bus stops or rail stations in the comparison. Met Council must apply the revised standard to all Metro Mobility trips, including those that include transfers.</i></p>	<p>The Council does not have the capacity to support a trip by trip comparability analysis to the regular route system for every trip. The Council will continue to provide trips which cannot be done on regular route. The Council will implement a maximum travel time threshold for each one-way trip based on distance that assumes an average speed of 15 mph (comparable to local regular route service). The matrix will add 30 minutes of walk time to the vehicle travel time. See attachment 5.6.1 for the maximum travel times by distance</p> <p>For trips 30 miles or more the maximum ride time will be 150 minutes.</p>	<p>Andrew Krueger Senior Manager Metro Mobility</p> <p>July 1, 2014</p>
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<p><i>Section 5.6 No Operational Patterns or Practices Limiting the Availability of Service to ADA Paratransit Eligible Individuals – Telephone Hold Times</i></p>	<p><i>Within 60 days of the issuance of the final report, Met Council must begin analyzing the distribution of long wait times on an hourly basis and communicate to its contractors its threshold for unacceptably long wait times. If this analysis confirms that wait times exceeding that threshold are common, Met Council must take action to provide an adequate number of call-takers during the days and hours when these long waits occur. Met Council must also report on its progress to increase line capacity to the call centers and reduce the incidence of busy signals.</i></p>	<p>The Met Council doubled the phone line capacity for Metro Mobility calls during the first quarter of 2014 to nearly eliminate busy signals and has installed additional reservationist workstations at Transit Team to increase the number of call-takers. Phone system reports have been created to monitor average hold times during each hour of the day by contractor. These reports are provided to the contractor and monitored by Metro Mobility Customer Service. The contractors also receive real time notification of excessive hold times.</p> <p>The Council is currently implementing an Interactive Voice Response (IVR) system that will push out scheduled trip information to customers the night before and imminent arrival messages 10 minutes prior to when the vehicle will be at the customer’s pick-up location. In addition, customers will be able to cancel rides automatically through a menu option. We believe that this technology will reduce the overall call volume and the demand on call-takers.</p>	<p>Andrew Krueger Senior Manager Metro Mobility</p> <p>Complete</p> <p>October 1, 2014</p>
<p><i>Section 5.6 No Operational Patterns or Practices Limiting the Availability of Service to ADA Paratransit Eligible Individuals – Untimely Drop-offs for Appointments</i></p>	<p><i>Within 60 days of the issuance of the final report, Met Council must reduce the number of very early drop-offs. Met Council must ensure that all of its service providers ask riders to provide appointment times when making reservations, and then enter these times into the paratransit software.</i></p>	<p>The Council has modified the Trapeze system parameters to reduce the number of appointment time drop-offs in excess of 60 minutes. The Council will require contractors to use the “Destination Req” tool available in Trapeze to more effectively schedule trips with appointment times.</p> <p>The Council has modified the reservationist procedures to require <i>that all customers are asked if they have an appointment time and rides are booked using an appointment time if one is provided by the customer.</i></p>	<p>Andrew Krueger Senior Manager Metro Mobility</p> <p>Complete</p>

<p><i>Section 5.7 Subscription Service</i></p>	<p><i>Within 60 days of the issuance of the final report, Met Council must analyze its subscription (standing order) trips for all Metro Mobility service providers to compare these hours with times when there are capacity constraints. During these hours, Met Council must limit subscription service to 50% of all trips.</i></p>	<p><i>The Met Council respectfully disagrees that there is a deficiency associated with Subscription service for two reasons.</i></p> <ol style="list-style-type: none"> <i>1. Metro Mobility Agency service is independent of the Demand service and should not be included in the calculation of standing order trip ratio by hour.</i> <i>2. Metro Mobility does not experience service capacity constraints and therefore is not limited to 50% subscription service.</i> <p><i>The Council challenges the reviewer’s inclusion of the Agency Contract in the calculation of a 50% standing order threshold. The Agency Contract functions completely independent of Demand service contracts and caters to the needs of large day training and rehabilitation centers and adult day care facilities while improving the service quality for riders without recurring and predictable trip needs that use the service provided under the Demand contracts.</i></p> <p><i>The Council recognizes that there are three deficiencies noted in section 5.6. However, the deficiencies identified are the result of recent FTA interpretations to ambiguous terminology in the regulations (regarding call hold times, trip lengths and appointment drop-offs) that the Council did not anticipate; not because of system capacity constraints. The Council contends that subscription service does not contribute to the deficiencies noted and that, in fact, reducing subscription service is counter-productive to correcting the deficiencies. For example, any problems with excessive telephone hold times will only intensify with a reduced number of subscription rides. Additionally, there is no indication that excessive ride times are occurring during the early morning hours</i></p>	
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		<i>when the report notes a greater than 50% system-wide subscription rate. Third, there is no analysis showing that appointment time drop-offs are negatively impacted at the hours in which there is a greater than 50% system-wide subscription rate. The Council is confident that minor operating procedure modifications will correct the issues identified in 5.6 and that the Council will continue to deliver all rides requested.</i>	
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<p><i>Section 5.8 Reasonable Policies for Proposed Service Suspensions for Missing Scheduled Trips and the Right to Appeal</i></p>	<p><i>Within 60 days of issuance of the final report, Met Council must cease the practice of charging no-shows against riders who do not pay the fare or who do not present a Metro Mobility ID card.</i></p> <p><i>Met council must revise its no-show suspension policy to reflect the percentage of no-shows relative to the rider's frequency of travel rather than only an absolute number of no-shows and establish suspension periods of reasonable length.</i></p> <p><i>Met Council must revise its appeals process for disputing no-show suspensions by providing the requisite separation of functions between those initially proposing service suspensions and those deciding appeals. The revised process must also permit riders facing service suspension to continue to receive service pending the outcome of the appeal.</i></p> <p><i>When a rider is a no-show for an outgoing trip, Met Council</i></p>	<p><i>The Met Council will make the following no-show procedural and policy changes by beginning July 1st, 2014:</i></p> <ol style="list-style-type: none"> <i>1. Metro Mobility will not charge no-shows when the customer does not pay the fare or does not present a Metro Mobility ID card and is refused transport.</i> <i>2. Riders who accumulate three no-shows and no-show more than 4% of their requested rides within a 30-day period will receive a warning letter from their primary service contractor.</i> <p><i>If the rider accumulates one or more additional no shows within 30 days of the first no show (4 or more total) and has no-showed more than 4% of their requested rides the rider may be suspended.</i></p> <p><i>The suspension will begin 14 days from the date of the suspension notification which will be sent by registered mail.</i></p> <p><i>The term of the suspension will be as follows.</i></p> <ul style="list-style-type: none"> <i>• First Suspension within a 12 month period – Up to 2 Weeks (14 Days)</i> <i>• Second Suspension within a 12 month period – Up to 4 Weeks (28 Days)</i> <i>• Three or more Suspensions within a 12 month period – Up to 6 Weeks (42 Days)</i> <ol style="list-style-type: none"> <i>3. Effective July 1, 2014, the MMSC will no longer issue No-Show Suspension letters. The primary service contractor will review all no-shows and issue no-show suspension letters. The contractor will excuse any no-shows that were caused by contractor error. No-Show suspension letters will be sent by the contractor to the customer via registered mail. The Metro Mobility service</i> 	<p><i>Andrew Krueger Senior Manager Metro Mobility</i></p> <p><i>July 1, 2014</i></p>
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	<p><i>must no longer cancel the return trip unless Met Council contacts the rider and confirms that the rider does not need the return trip; Met Council must also revise its policy documents and public information regarding no-shows accordingly.</i></p>	<p><i>contractor will inform the Metro Mobility Service Center (MMSC) when a no-show suspension has been implemented.</i></p> <p>Appeal Process</p> <p><i>Step 1: Riders may dispute a no-show or suspension issued by their contractor at any time after receipt of the suspension letter and prior to the start of the suspension by contacting the MMSC at 651-602-1111 OR by email to MetroMobility@metc.state.mn.us. The MMSC will review documentation of each recorded no-show and make an official determination of the validity of the suspension.</i></p> <p><i>Step 2: Riders may appeal the decision of the MMSC by submitting a written notice of appeal in writing either through mail, email, or fax prior to the start of the suspension. The rider may submit additional information regarding their no-shows, but are not required to do so. All Step 2 appeals are conducted by an outside, independent panel. The MMSC will defer the no-show suspension start date until after the no-show appeal panel makes a final written determination. The panel may meet in person or via telephone conference to discuss the appeal. The rider will be invited to attend either the in-person appeal or the teleconference but is not required to do so in order for the appeal to be heard. The decision of the appeal panel will be final.</i></p> <p>4. <i>When a rider is a no-show for an outgoing trip, the Met Council will no longer cancel the return trip unless the Met Council has confirmation from</i></p>	
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		<i>the rider that the rider does not need the return trip. The Met Council will revise its policy documents and public information regarding no-shows accordingly.</i>	
5.10 Nondiscrimination	<p><i>Within 60 days of the issuance of the final report, Met Council's age policy for riders under age six must be the same on both Metro Mobility and Metro Transit.</i></p> <p><i>Met Council must also change its policies and procedures for Metro Mobility trips that include transfers so that riders who cannot be left unattended are not also required to travel with attendants to transfer between vehicles to complete their trips.</i></p>	<p><i>The Met Council has clarified the requirements for Metro Transit riders under age six to say "Ages 5 and under ride free and must be accompanied by a fare-paying customer (limit 3)". This change has been made to the Metro Transit web site and aligns the Metro Mobility and Metro Transit policies. See Attachment 5.10.1</i></p> <p><i>Effective with new service contracts implemented during the third quarter 2015, the Met Council will eliminate all transfers.</i></p>	<p>Andrew Krueger Senior Manager Metro Mobility</p> <p>Complete</p> <p>Third Quarter 2015</p>

<p><i>5.12 Service Under Contract with a Private Entity</i></p>	<p><i>Within 60 days of the issuance of the final report, Met Council must begin monitoring and measuring on-time pickup performance for trips Taxi Services, Inc. provides.</i></p> <p><i>Met Council must modify its telephone hold-time performance standard and must require its service providers to report telephone hold times.</i></p> <p><i>Met Council must regularly monitor each service providers' drop-off performance.</i></p> <p><i>Met Council must regularly review the trip requests that its contractors classify as no-shows to ensure they are properly distinguishing between rider no-shows and missed trips.</i></p>	<p><i>The Met Council respectfully disagrees. The Met Council's use of taxi service is for non-ADA trips only. At the time of the review, there were a very small number of ADA trips erroneously placed on taxi service. Since then, Met Council has strengthened its oversight of contractors regarding this issue and assesses a large fine if contractors place ADA trips onto taxi service. This has eliminated the errors.</i></p> <p><i>Effective with new service contracts implemented during the third quarter 2015, the Met Council will contractually modify its telephone hold-time performance to reflect an average of not to exceed 90 seconds during all reservation hours. The Council is currently monitoring telephone hold times and working with contractors to meet a not-to-exceed 90 second average hold time at all hours of the day.</i></p> <p><i>The Met Council regularly monitors private providers' drop-off times and will continue to do so.</i></p> <p><i>Met Council will regularly review the trips that its contractors classify as no-shows to ensure they are properly distinguishing between rider no-shows and missed trips.</i></p>	
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<p><i>5.13 Service Provided by Another Public Entity</i></p>	<p><i>Within 60 days of the issuance of the final report, Met Council must be receiving and reviewing performance information from Scott County, including on-time performance (pickup and drop-off), long trip analysis, and telephone hold-time performance.</i></p> <p><i>Met Council must modify its telephone hold-time performance standard and must require its service providers to report telephone hold times.</i></p> <p><i>Met Council must regularly monitor each service providers' drop-off performance.</i></p> <p><i>Met Council must begin to review the trip requests that its service providers are classifying as no-shows to ensure they are properly distinguishing between rider no-shows and missed trips.</i></p>	<p><i>By July 1, 2014, the Met Council will require Scott County to report on-time performance (drop-off and pickup), long trip analysis, and telephone hold times on a monthly basis.</i></p> <p><i>Effective with new service contracts implemented during the third quarter 2015, the Met Council will contractually modify its telephone hold-time performance to reflect an average of not to exceed 90 seconds during all reservation hours. The Council is currently monitoring telephone hold times and working with contractors to meet a not-to-exceed 90 second average hold time at all hours of the day.</i></p> <p><i>Met Council will regularly review the trips that its contractors classify as no-shows to ensure they are properly distinguishing between rider no-shows and missed trips.</i></p>	<p>Andrew Krueger Senior Manager Metro Mobility</p> <p>July 1, 2014</p>