



PETERSBURG AREA TRANSIT PARATRANSIT POLICY MANUAL



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Initials :

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PROGRAM OVERVIEW

Petersburg Area Transit (PAT) **Paratransit program** provides (door-to-door) specialized transportation service directly related to the functional ability of individuals with disabilities which prevent them from using standard fixed route transit service. Service is provided within $\frac{3}{4}$ miles of the standard Petersburg Area Transit bus system servicing the area.

Petersburg Area Transit meets or exceeds the requirements for paratransit services as defined by United States Department of Transportation, Americans with Disabilities Act (ADA).

Table of Contents

Driver Vehicle Policy	4
Paratransit Service	4
Hours of Operation/ Closures/ Fare	5
Eligibility	6-7
Service Animals/ Securement Policy.....	8
Subscription Service/ Telephone Access Policy/ Trips [Reservation Scheduling]	9
Reasonable Modification/ Canceling Trips	10
No Capacity Constraints/ Limiting the Number of Trips	10
Waiting List/ Companions/ Visitor Policy	11
Number of Pkgs Allowed/ Subsidy Programs/ Coordinating w/ Adjacent Providers	12
No-Show Policy	12-14
Performance Monitoring Program	14
On-Time Performance.....	14-15
Missed Trips.....	15
Trip Denials/ Trip Lengths Policy	16
Appealing Suspension	17
Record Retention	17

DRIVER VEHICLE POLICY

PAT Paratransit Drivers are experienced at transporting passengers to and from scheduled trips, mobility device safety securement and the safe operation of the vehicle.

1. Drivers must always maintain sight of the Paratransit specialized transportation vehicle, and/or whenever there is a client(s) on board.
2. Paratransit Service is an origin-to-destination service. This means no Paratransit Driver is required to transport you to or from your door.
3. Drivers are not required to assist an individual in rooms or other areas of a building. If a customer requires further assistance, a personal care attendant (PCA) must accompany the customer. The customer is responsible for notifying the Paratransit office in advance.
4. Drivers can offer stabilization assistance when a passenger is loading and exiting the vehicle, when securing a mobility device and at seatbelt securement.
5. Drivers are not required to assist passengers with loading and unloading carryon items.
6. For the safety of the Drivers and all passengers, the Paratransit drivers are prohibited from having lengthy conversations while driving. If you have service-related questions feel free to ask, but for safety reasons please keep distractions to a minimum.

PARATRANSIT SERVICE

A. AREA

PAT provides specialized transportation service to origins and destinations within a $\frac{3}{4}$ mile buffer from PAT's fixed route bus service stops. This $\frac{3}{4}$ mile service area also includes the end point of a route as well. Please remember that when PAT makes changes to fixed route bus services, this will affect the service area for the specialized transportation. Specialized transportation service is available during the same days and service times as the fixed bus route service.

8. PERFORMANCE

1. PAT's specialized transportation strives to meet on-time service performance goal of 90-95%.
2. Pick-up times for clients can be from fifteen minutes (15) to and/or fifteen minutes (15) after scheduled pick-up time. Clients are asked to be ready for pick-up at least fifteen minutes (15) minutes before pick-up.
3. Pick-up times must be that the scheduler does not adjust the rider's schedule pick-up time (user time) or the pickup window without the rider's consent and must limit any changes to within one-hour (60) minutes of the requested pickup time.
4. Travel times must be monitored by Drivers who must inform base operations if a client's travel time exceeds thirty (30) minutes, but no more than one-hour (60) minutes.
5. Back up service for specialized transportation vehicles will be provided by other specialized transportation Drivers when needed.

C. WAITTIMES

1. Once the Paratransit vehicle arrives at the pickup location, the Driver shall wait a maximum of five (5) minutes for the client's arrival. If the client has not arrived, the Driver shall call base operations informing them that the client has not arrived.
2. Base operations will attempt to contact the client and if there is no answer, base will inform the Driver to continue to the next scheduled pick up. This pick-up attempt will be logged as a no show against the client.
3. For weekend trips where "base" is not in operation, the Driver will attempt to contact the client using their company issued telephone. If no contact is made, the driver will note this as a no show on their log.

HOURS OF OPERATION

Paratransit services operate during the same days as PAT's fixed route system and follows the evening schedule of PAT's modified routes. Service days are Monday through Saturday from the hours of 5:45 a.m. to 10:15 p.m. The earliest pick-up is 5:45 a.m. and there are **No Sunday** services.

HOLIDAY CLOSURES

PAT Paratransit and fixed route services do not operate on the following seven (7) holidays during the calendar year:

- New Year's Day
- Memorial Day
- Juneteenth Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day

FARE(\$)

1. The normal fare for PAT's Specialized Transportation Service is \$1.75 for each one-way trip. The rate is currently zero fare and is subject to change when fare charges resume. PAT Paratransit is **currently offering zero-fare rides until further notice.**
2. Clients are welcome to have one additional person to accompany them during their trip if the origin (pickup) and destination (drop off) is the same as the scheduled client.
3. The companion rider must pay full fare when riding. A Personal Care Attendant (PCA) or designated person who acts as a Personal Care Attendant is allowed to travel free of charge.
4. All PCA's employed by a service company must have valid photo identification from the agency that employs them to receive free travel.
5. PAT Paratransit drivers do not carry cash. PAT Paratransit drivers are not allowed to search for the rider's purses or other personal belongings to retrieve fare.

ELIGIBILITY

A. WHO IS ELIGIBLE?

Eligibility for complimentary paratransit is directly related to functional ability of individuals with disabilities to use fixed route transit services. Eligibility is not based on diagnosis or type of disability. Individuals with the same diagnosis or disability can have very different functional abilities to use fixed route services. Similarly, eligibility is not based on the type of mobility aid that individuals require. Wheelchair use does not imply automatic eligibility. Nor is ADA paratransit eligibility based on age, income, or whether individuals can or cannot drive or have access to private automobile transportation. (FTA C 4710.1, Chapter 9, Section 9.2. I)

B. ELIGIBILITY DETERMINATION

1. Eligibility for (door to door) service is predetermined through an application process. Applications are reviewed to determine if the applicant is unable, due to disability, to use fixed route public transportation that is available to the public.
2. The Paratransit coordinator will make a written determination of eligibility within 21 days of the date the completed application is received. During this time, the applicant may utilize the service.

C. INTERVIEW POLICY

1. Once the applicant has received the application, filled out ALL required information and returned the form to the Paratransit office, the specialized transportation coordinator will call and set up the interview time for the applicant.
2. Applications can be reviewed over the phone or in-person. Applicants who need transportation for the in-person interview must be informed that transportation can be provided if needed to complete the application interview process.
3. This service is free to all applicants who request transportation. Applicants can schedule this after the Paratransit coordinator schedules them for their interview.

D. TYPES OF ELIGIBILITY

Applications may be granted conditional or unconditional eligibility, based on the nature of the disability. The conditions which make the applicant eligible will be specifically listed in the "Eligibility Notification Letter" provided to the applicant.

E. RECERTIFICATION POLICY

All Paratransit clients enrolled will be recertified **every 2 years**. Client's address, phone numbers, emergency information, medical certification, eligibility, and other pertinent information is required as part of the recertification process.

ELIGIBILITY NOTIFICATION LETTER

1. All ADA applicants will receive an "Eligibility Notification Letter" indicating their eligibility type and the specific date this eligibility will need to be re-certified.
2. Should the applicant wish to access ADA Specialized transportation service on another public transportation provider, the applicant can use a copy of their eligibility letter to verify their status as an ADA eligible client.

DENIAL LETTER

A. NOTIFICATION POLICY

Based upon a review of your application for certification of Paratransit (specialized transportation) eligibility, (Petersburg Area Transit) has determined that you are not eligible for Paratransit service. This determination based on the following factors: ***ALL FACTORS MUST BE NOTED ON DENIAL LETTER WITH APPEAL INSTRUCTIONS.***

B. APPEAL POLICY

1. If you do not agree with the decision that has been made, you have the right to appeal this determination.
2. ***Any request for an appeal must be made in writing and must be mailed within 60 days of the date of this letter.***
3. The enclosed description of the appeal policy provides additional information about the process.
4. Please also note that if there is any change in your ability to use the fixed route service in the future, you may submit a new application.

Contact Information:

Petersburg Area Transit- Paratransit Supervisor
100 W. Washington St., Petersburg, VA 23803
Phone: (804) 324-5658

APPEALING ELIGIBILITY

1. PAT appeal policy requires all information concerning the process, materials necessary to apply for eligibility, and notices and determinations concerning eligibility shall be made available in accessible formats, upon request.
2. PAT must respond ***within 21 days*** following the submission of a complete application, if the entity has not decided on eligibility; the applicant shall be treated as eligible and provided service until and unless the entity denies the application.
3. PAT determination concerning eligibility shall be in writing. If the final determination is that the individual is ineligible, the notification of the determination shall state the reasons for the finding.
4. PAT must provide documentation to each eligible individual stating that he or she is "ADA Paratransit Eligible."
5. The documentation shall include the:
 - Name of the Eligible Individual
 - Name of the Transit Provider
 - Telephone Number of the Entity's Paratransit Coordinator
 - An Expiration Date for Eligibility

6. Any editions or limitations on the individual's eligibility (including the use of a personal care attendant).
7. PAT may require recertification of the eligibility of ADA paratransit eligible individuals at reasonable intervals. That established recertification is **two (2) years**.
8. PAT must establish an administrative appeal process through which individuals that are denied eligibility can obtain review of the denial.
9. PAT requires that an appeal be ***filed within 60 days*** of the denial of an individual's application. This process must include an opportunity to be heard and to present information and arguments, separation of functions (i.e., a decision by a person not involved with the initial decision to deny eligibility), and written notification of the decision, and the reasons for it.
10. PAT is not required to provide paratransit service to the individual pending the determination on appeal. However, ***if the entity has not decided within 30 days*** of the completion of the appeal process, the entity shall provide paratransit service from that time until and unless a decision to deny the appeal is issued.

SUBSCRIPTION SERVICE

Subscription service is pre-arranged trip (s) clients arrange for a particular time. Such trips require no reservation since they are scheduled at a particular time. The service *cannot* comprise *more than* 50% of the available trips at any given time if there is a capacity constraint at that time of day.

Note: If the Paratransit service operates without capacity constraints, then there is no limit to subscription service. Review this service to ensure it does meet capacity constraints.

TELEPHONE ACCESS POLICY

PAT standard for telephone performance that 100% of all calls be answered within 3 minutes. Since Paratransit only has two dedicated telephone lines for all its specialized transportation services, the hold times may be longer.

TRIPS

A. RESERVATION

1. Trip reservations can be made up to fourteen ***(14) days in advance*** and no later than 5:00pm the day before the trip.
2. Clients are encouraged to make reservations ahead of time, which assists us in providing a more efficient service.
3. When making reservations during PAT office closure hours, please leave a message on the PAT voicemail system, available 24 hours a day, seven days a week. Your call will be returned to confirm requested scheduling for the next day.

B. SCHEDULING

1. After PAT Paratransit has determined you are eligible for specialized transportation service, you can schedule a ride by calling PAT Paratransit Office **at (804) 324-5658**.
2. Clients may schedule trips up to **14 days** in advance. Weekday office hours for scheduling trips are 8:30am - 5:00pm. The office is closed on weekends.
3. Trip requests left on the answering machine before 5:00pm Monday - Friday will be returned the same day.
4. When PAT offices are closed, your call will be routed to an answering machine. You will be asked to leave a message requesting your trip.
5. ***Trip requests left on the answering machine on Saturday after 5 pm and Sundays) for Paratransit services will be confirmed on the next day of business.***
6. When scheduling an appointment leaving a message, you will need to provide:
 - o Your name
 - o Your phone number
 - o Exact address of pick-up
 - o Exact address of destination
 - o Date of desired trip
 - o Desired time of pick-up and/or drop-off
 - o Number of people traveling (including Personal Care Attendants)
 - o Special instructions (such as wheelchair ramp, color of house and building, or name of office, etc.)

REASONABLE MODIFICATIONS

5. Petersburg Area Transit is committed to making reasonable modifications in policies, practices, and/or procedures when such accommodations are necessary to avoid discrimination based on disability.
6. Petersburg Area Transit will operate using Reasonable Modification in good faith.
7. Paratransit will make reasonable modifications on a case-by-case basis to ensure that all assistance is given to Para-Transit clients with fair and sensible judgement.
8. Clients should make a request for reasonable modification when making the reservation. Advance notice is needed in handling flexibility requests.

For Example: The driver may be instructed to pull into the client's driveway, to allow a client to eat or drink to avoid health consequences, or to assist in extreme weather etc.

C. CANCELING TRIPS

If you are unable to make your scheduled ride, please call PAT Paratransit as soon as possible. To cancel a scheduled trip, call the office at (804) 324-5658, but **no later than one (1) hour before** the scheduled pick-up time.

- Rides that are not cancelled one hour before a scheduled pick up are considered no-shows. Paratransit clients are subject to cancellation penalties as established by PAT for excessive cancellations. This could mean possible verbal warnings, written warnings, and service suspension.

D. NO CAPACITY CONSTRAINTS

Petersburg Area Transit will not limit the availability of complementary para-transit service to ADA eligible individuals by any of the following.

Restricting the number of trips an individual will be provided.

- Any operational pattern or practice that significantly limits the availability of service to ADA para-transit eligible persons.
Waiting list for access to the service.

F. POLICY AGAINST LIMITING THE NUMBER OF TRIPS

Petersburg Area Transit will not limit the number of trips a rider can take per day. However, PAT will consider in-vehicle times and pick up windows of two (2) closely spaced trips by the same rider, so they do not overlap. In this instance PAT will not accept a rider requesting two (2) trips in only sixty (60) minutes. PAT will request that the rider schedule the two (2) trips to be at least ninety (90) minutes apart.

SERVICE ANIMALS

A service animal is any guide dog, signal dog, or other animal individually trained to work or perform tasks for an individual with a disability. The use of a service animal must be identified on the ADA application. To ride PAT Paratransit:

- The animal must remain under the control of the owner and behave appropriately.
- The animal must remain at your feet or on your lap. It may not be seated on a vehicle seat, and the animal must not be aggressive toward people or other animals.
- You are responsible for any damage caused by the animal (49 CFR 37.167 (d)). Drivers are not permitted to assist or handle service animals.

PORTABLE OXYGEN AND RESPIRATORY EQUIPMENT

Passengers may travel with medically necessary portable oxygen and respiratory equipment. Oxygen tanks must be secured against movement; liquid oxygen must remain upright; bags and pouches must be attached securely; and tubing, cords, aisles, doors, exits, and wheelchair securement areas must remain clear. Operators will verify safe placement before the bus moves.

G. POLICY AGAINST WAITING LIST

1. Petersburg Area Transit will realize complementary Paratransit operations practices will amount to waiting list which are prohibited by § 37.13(f)(2).
2. Placing callers' names on a list when the schedules are full and informing them that PAT will contact them when a space becomes open constitutes a waiting list. Suggesting to callers that they call back to see if a space is open would be considered a waiting list.
3. PAT will accept a trip request during a reservation call and schedule the trip later. It may not always be possible for PAT to identify a scheduling solution during a reservation call. If the call-taker accepts the trip request and confirms the requested time with the rider. This will be considered by PAT a confirmed but unscheduled trip.

COMPANIONS

(Zero Fare began in 2020 and will continue until further notice)

A Companion may travel with a client and will be charged the same fare price as the client (\$1.75). *Exception:* There is no charge for Personal Care Attendants (PCA) who are traveling as an aid to assist the passenger when he/she requires assistance.

Children can ride with the client if they can be properly supervised. You *must provide* an *approved car seat* for children who *cannot be* safely secured with a seat belt.

Children under four (4) years of age and under forty (40) pounds are required by law to use a safety seat.

PAT *does not* provide safety seats and drivers *are not* permitted to secure them or the child in the vehicle.

Children under six (6) can travel at no cost, however if they are over the age of six (6) they can travel for the same discounted fare as the fixed route.

VISITOR POLICY

A person visiting from out of town is eligible for Paratransit service for *up to 21 days* in one (1) calendar year. **Note: The 21 days do not have to run concurrently.**

Visitors who present documentation of eligibility from their home areas are entitled to visitor eligibility.

For those visitors who do not present evidence of eligibility, documentation can only be required of visitors whose disability is not apparent.

PAT must accept a signed statement from a visitor stating that he or she is unable to use the fixed route system.

Reservations can be made by calling PAT Paratransit office at (804)324-5658. When scheduling a pickup, you will need to provide:

- Your name
- Your phone number
- Exact address of pick-up
- Exact address of destination
- Date of desired trip
- Desired time of pick-up and/or drop-off
- Number of people traveling (including Personal Care Attendants)
- Special instructions (such as wheelchair ramp, color of house and building, or name of office, etc.)

NUMBER OF PACKAGES ALLOWED

1. Passengers are allowed to carry **no more than** (5) standard size grocery bags or other items which take up an equivalent space (2x2x2 - a two-foot cube) that they can carry themselves.
2. Each item must not weigh more than twenty-five pounds. Packages can only be put in seats if there's available space.
3. Packages must be removed if it prohibits another client from having an available seat.
4. Drivers are prohibited from carrying purchased items into a customer's residence.
5. Drivers are not required to but can assist you in loading and unloading your items to and from the curb.

SUBSIDY PROGRAM

Currently Petersburg Area Transit does not have a Subsidy program. This program will be determined at a future date.

COORDINATING WITH ADJACENT SERVICE PROVIDER

PAT Paratransit clients should contact GRTC Care Van service for information on this service.

NO-SHOW-POLICY

1. Petersburg Area Transit understands that because PAT requires trips to be scheduled in advance, riders may sometimes miss scheduled rides or forget to cancel a trip they no longer need.
2. PAT also understands that the riders may sometimes miss scheduled trips or be unable to cancel trips in a timely way for reasons that are beyond their control.
3. However, repeatedly missing scheduled trips or failing to cancel trips in a timely way can lead to suspension of service.

A. DEFINITIONS

No-Show: A no-show occurs when a rider fails to appear to board the Para-bus for a scheduled trip. This presumes the bus arrives at the scheduled pickup location within the pickup window, and the driver waits for at least (5) minutes.

Pickup Window: The pickup window is defined as from (15) minutes before the scheduled pickup time to (15) minutes after the scheduled pickup time. Riders must be ready to board the bus that arrives within the pickup window. The driver will wait for a maximum of (5) minutes within the pickup window for the rider to appear.

Late Cancellation:

A late cancellation is defined as either a cancellation made less than

(1) hour before the scheduled pickup time or as a cancellation made at the door or refusal to board a bus that has arrived within the pickup window.

Beyond Client's Control: Petersburg Area Transit does not count as no-shows or late cancellations of any missed trips due to our error, such as:

- o Trips placed on the schedule in error.
- o Pickups scheduled at the wrong pickup location.
- o Drivers arrive early and departing before the pickup window begins.
- o Drivers arriving late (after the end of the pickup window)
- o Drivers arriving within the pickup window but departing without waiting the required (5) minutes.
- o Medical Emergencies.
- o Family Emergency.
- o Sudden illness or change in condition.
- o Appointments that run unexpectedly late without sufficient notice.

Note: Riders should contact the PAT Paratransit office at (804) 324-5658 when no-shows or late cancellations are due to circumstances beyond their control.

B. SUBSEQUENT TRIPS FOLLOWING NO-SHOW (EXAMPLE)

When a rider is a no-show for one trip, all subsequent trips on that day remain on schedule unless the rider specifically cancels the trips.

To avoid multiple no-shows on the same day, riders are strongly encouraged to cancel any subsequent trips they no longer need that day.

C. SUSPENSION- PATTERNS OF NO-SHOWS OR LATE CANCELLATIONS

A rider is subject to suspension only when all the following conditions occur within the same calendar month:

The rider accumulates 8 penalty points.

The rider has booked at least 4 trips that month.

The rider has no showed or late cancelled at least 30% of those booked trips.

PAT will call riders once they reach 8 penalty points to warn them that any additional penalty point that month may result in suspension.

Suspension Notices All suspension notices will include:

A copy of this policy

Instructions for disputing no shows or late cancellations

Information on how to appeal a suspension

Suspension Schedule **Suspensions** always begin on a Monday.

The first violation in the calendar year results in a warning letter only.

Each additional violation leads to the following suspension lengths:

- o Second violation: 3-day suspension
- o Third violation: 5-day suspension
- o Fourth violation: 10-day suspension
- o Fifth and later violations: 15-day suspension

DISPUTING NO-SHOWS OR LATE CANCELLATIONS

1. Riders wishing to dispute no-shows or late cancellations must do so within (5) business days of receiving the suspension letter.
2. Riders should contact Petersburg Area Transit (PAT) Paratransit services at (804)324-5658 Monday-Friday at 7:00am-5:00pm to explain the circumstances and request the removal of the no-show or late cancellation.

D. APPEALING NO-SHOWS OR LATE CANCELLATIONS

1. Riders wishing to appeal suspensions under this policy have the right to *file an appeal*, which must be *in writing by letter or via email*.
2. Riders must submit a *written appeal request within (5) business days* of receiving the suspension letter.
3. Riders who *miss* the appeal request ***deadline will be suspended*** from Petersburg Area Transit (PAT) on the date listed on the suspension notice.
4. All suspension appeals follow Petersburg Area Transit appeal policy.

PERFORMANCE MONITORING PROGRAM

1. As one of the most important complementary Paratransit service requirements, § 37.13 (f) prohibits a transit agency from operating complementary Paratransit service in a manner that significantly limits the availability of the service through a "pattern or practice" of actions, commonly referred as capacity constraints. Operational problems outside the control of the agency do not count as part of a pattern or practice under this provision.
2. Petersburg Area Transit's performance monitoring program is designed to alert PAT of any potential capacity constraints. PAT will not limit the availability of complementary Paratransit service to ADA eligible individuals by any of the following:
 - o Restricting the number of trips an individual will be provided.
 - o Any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons.
 - o Maintaining a waiting list for access to the service. It is PAT's policy not to place callers on a wait list.

ON-TIME PERFORMANCE

On-time Performance is Paratransit's ability to pick up and drop off riders within the prescribed windows of time. The pick-up window is based on the scheduled pick-up time, plus or minus a predetermined number of minutes. Also, if a rider arrives at his or her destination **on time**, it is considered on time performance.

- The number of late pick-ups or drop-offs for initial rides or returns. A pick-up or drop-off is considered late when it is more than **30 minutes** past the scheduled pick-up or drop-off time.
- The number of trip denials or missed trips. Trip denials include rides that are accepted outside the hour scheduling window. Declined round trips will be counted as two (2) denials when one leg of a round trip cannot be scheduled within the hour window and the requester declines the round trip.

- The number of trips with excessive lengths. Excessive trip length is defined as a trip that takes no more than two times longer than the trip would take on a fixed route.
- The number missed calls on the trip reservation line. Missed calls will be measured by the amount of reservation calls that roll over and go to voicemail.

On-time FTA considers pickups as on time when a driver arrives at the pickup location within the established pickup window.

Early FTA considers pickups early if a driver arrives and departs with the rider before the established pickup window begins.

- Late FTA considers pickups late if a driver arrives after the end of the established pickup window and the rider boards the vehicle.

The following Chart is an example of the newly acquired CTS software that monitors the service criteria for ADA Paratransit capacity constraints and on time performance.

Level of Service	Measure of Service
Travel Time	Time between pick-up and drop off
Missed Trips	Percentage of one-way trips canceled by PAT. Plus trips provided too late for a rider to make appointment
Trip Denials	Number of one-way trips unable to be scheduled
On time performance	Percent of trips provided within a given window time of 15-30 minutes

MISSED TRIPS

1. Missed trips which are typically caused by agencies and not the rider. These trips result from scheduled requests that do not take place because of the following:

Examples of Missed Trips include:

The vehicle arrives and leaves before the beginning of the pickup window without picking up the rider and without any indication from the rider that he or she no longer wants to make a trip.

A rider is not obligated to board until the beginning of the pickup window.

- The vehicle *does not wait for* the required time within the pickup window, there is no contact with the rider, and the vehicle departs without the rider. During the wait time if the rider indicates he or she no longer wants to take the trip, this is recorded as a canceled trip at the door.

The vehicle *does not arrive* at the pickup location.

2. When riders do not board as scheduled, communication between drivers and PAT base operations can often resolve issues. Base can verify the pickup location through the CTS software system which provides the (vehicle arrival time, and the negotiated pickup time within the window time).
3. After confirming the information, "Base" can direct the driver and document the event in their records. To help minimize the likelihood of missed trips and passenger no-shows, base and supervisors can instruct drivers who arrive early to wait the full wait time established by PAT within the on-time window. It is important that "Base" record no-shows and missed trips appropriately.
4. When missed trips arise from improper actions by drivers and base (if base advises a driver to wait two minutes, then leave), the appropriate remedy will be proper training or retraining.

TRIP DENIALS

Trip denials are when PAT cannot accept a trip request. Avoiding denials means carefully planning service, allocating resources, and managing operations to meet 100 percent of expected demand. PAT typically does not experience denying trip requests. *Examples of Trip denials include:*

- A rider requests a next-day trip and PAT says it cannot provide that trip.
A rider requests a next-day trip and PAT can only offer a trip that is outside of the 1 hour negotiating window. Even if the rider accepts the offer this is considered a denial.
 - A rider requests a round-trip and PAT can only provide one leg of the trip. If the rider does not take the one-way trip offered, both portions of the trip are considered a denial.
2. PAT has a new software system CTS that will monitor trip denials, missed trips, and on-time performance. The system is overseen by the Paratransit supervisor, who checks for on-time performance throughout the day of each of the scheduled and unscheduled trips to ensure that patterns and practices of trip denials are not occurring,
 3. PAT will document the rider's identification, date of the request for trip and time, origin and destination, and reason for the denial.

TRIP LENGTHS POLICY

1. PAT understands that the length of complementary para-transit trips (also called travel time, trip duration, on board time, or in vehicle time), is another important measure of service. A practice or pattern of excessive trip lengths is a form of capacity constraints.
2. PAT understands that excessive is in comparison to the time required to make a similar trip using PAT's fixed route system. While a 1-hour travel time for a 5-mile complementary Paratransit trip may seem excessive in the abstract, if the same trip takes an hour using PAT's fixed route system, it is comparable not excessive.
3. To help minimize the number of excessive long trips, PAT has established a trip length performance standard. This is comparable in relation to the length of fixed route trips noted below as follows:

- o Walking time to the stop/station from the original address
 - o Waiting time
 - o In- vehicle time (for all trip segments)
 - o Walking time from the final stop/station to the destination address
4. To account for in-vehicle time and times that may vary depending on day of week and time of day PAT utilizes the CTS software system, which plans trips and estimates the varying travel times for specific trips. PAT will monitor monthly trip length.
 5. As for on-time performance, operational problems that are attributable to causes beyond the control of PAT cannot be a basis for determining that a pattern or practice of excessive trip lengths exists.

APPEALING SUSPENSIONS

1. The ADA guarantees that a rider may file a local appeal of a transit agency decision to suspend the provision of paratransit service due to a pattern of missing scheduled trips. If a rider requests an appeal, paratransit service must continue to be provided to the rider until the appeal is heard and decided.
2. According to the DOT ADA regulation Appendix D. Appeals must be forwarded in writing, **within five (5) days, to:**

***Petersburg Area Transit - Paratransit Office
100 W. Washington St., Petersburg VA 23803
Phone: (804) 324-5658***

3. PAT will respond to all appeals in writing within five (5) days of receipt of the complaint.
4. PAT will notify the person of the date, time and location of the appeals hearing. The person appealing the decision is allowed to have someone accompany them to the appeals hearing.
5. ***The PAT staff and the Director of Mass Transit will hear "Suspension of Service" appeals.*** The committee will review the documentation provided by the person appealing and they will also accept oral testimonies.
6. Within **five (5) days** PAT will make a final decision regarding the appeal. A person's service will not be affected during the appeals process. If a final determination supports a suspension of service, thirty (30) days will be given before suspension takes effect.

RECORD RETENTIONS

Clients' complaints are kept on file for a period of one (1) year, and the records are maintained in the computer database for at least five (5) years.