

PARATRANSIT PLAN
for the
JONESBORO ECONOMICAL TRANSPORTATION SYSTEM
AMERICANS WITH DISABILITIES ACT OF 1991 (as amended)



Submitted to the
Arkansas Highway and Transportation Department
Federal Transit Administration
Federal Highway Works Administration
U.S. Department of Transportation

I. INTRODUCTION AND BACKGROUND

Intent of the ADA and Requirement for Plan

The Americans with Disabilities Act of 1991 (as amended) (ADA) calls for, among other things, the development of a complementary Para-Transit Plan and implementation of the service defined by the plan. Regulations printed in the 1991 Federal Register defined the following:

1. Para-transit service requirements;
2. The content of the plan;
3. Deadlines for the plan;
4. Deadlines for meeting the service requirements.

The intent of the ADA public transportation regulations is to create a fully accessible fixed route system. This will be achieved by the imposition of design standards on all fixed route vehicles over twenty-two (22) feet in length that are purchased after October 1, 1991. The ADA presumes (but does not mandate or require) that most bus fleets are renewed through replacement about every 12 years. Therefore, within twelve years, the fleets of most systems will be comprised of fully accessible vehicles. All the buses in the Jonesboro Economical Transportation System (JETS) fleet are accessible buses, and therefore, JETS is in full compliance with ADA.

The ADA establishes a civil right to the use of fixed route services that are available to the general population of an area. The ADA specifically does not attempt to address the total transportation needs of disabled persons. It simply establishes the right to the same level of transit service at a comparable fare that is provided to able-bodied persons.

The ADA recognizes, as stated above, that it may take several years for transit systems to have fully accessible vehicles on all routes. The intent of the Para-transit regulations, therefore, is to provide interim and complementary service for those portions of the service which are not yet accessible. Five years is allowed for full compliance with the Para-transit requirements. A plan must be submitted and implementation must begin with its submittal.

This document constitutes the plan of the Jonesboro Economical Transportation System. It will be submitted to the Region VI Office of the Federal Transit Administration (FTA), US Department of Transportation (address in appendix) on or before May 31, 2006.

Because the Jonesboro Economical Transportation System is a new start-up and the current operating standards and condition of our fleet being above standard, we anticipate beginning the system in full compliance. In the event we discover the inability to maintain full compliance, we will provide to the public and the FTA, our progress in meeting the milestones. JETS will adhere to the public review process in the event of plan modification.

JETS will begin operating a Demand/Response service in June 2006, and the service will form the basis of JETS complementary Para-transit service. Necessary modifications to the service will obviously affect the current users of the service, and the plan has been developed with the intent of minimizing adverse effects, if any, to the existing users.

The content of this document is specified by the ADA, as follows:

1. General information about the entity submitting the plan (JETS);
 2. A description of the fixed route system as of August 1, 2005;
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3. A description of proposed Para-transit services;
4. Information about the proposed eligibility determination process;
5. A description of the public participation process;
6. A discussion of efforts to coordinate the provision of service with other public entities in overlapping or contiguous areas (not applicable); and
7. Required certifications and resolutions.

Required Service Standards

The ADA requires that JETS will provide a Para-transit service that meets the following service criteria:

Service Area:

The Para-transit service area must, at a minimum, cover area three-quarters of a mile on both sides of the fixed route regular bus service. There is an exhibit in this report showing this area. It falls wholly within the city limits of Jonesboro. The proposed Demand/Response service meets and exceeds this standard. JETS Para-transit service prioritizes all ADA eligible over non-eligible to prevent conflict with capacity constraints.

Hours and Days of Service:

The Para-transit service must operate during the hours and days that the fixed route service operates. Generally, this is 6:00 a.m. until 6:00 p.m. Monday through Friday and Saturday from 8:00 a.m. until 8:00 p.m. The Para-transit service is designed to meet this standard.

Response Time:

The regulations call for "next day service." In other words, a user should be able to request service at any time on the day prior to requiring transportation. The proposed Demand/Response service requires 24 hours advance notification including Sunday and Holiday scheduling for the ADA eligible. JETS will adhere to the next day service requirements. JETS meets this standard.

Trip Purpose:

Requests for all types of trip purposes must be made on an equal basis and no prioritizing according to purpose or need can be made. JETS Para-transit service meets this standard. JETS will not prioritize the purpose of the trip but will give priority to those ADA eligible that are located within the corridor over Demand/Response passengers located outside the corridor.

Fares:

The fare charged by the Para-transit service can be no more than two and one-half times the fare that a person without a disability would have paid for a similar trip on the fixed route system. JETS meets this standard.

Capacity Constraint:

The service cannot be operated with policies, operating practices, or waiting lists that serves to limit availability of Para-transit service. The proposed Para-transit service, as outlined in Section V, will identify method of compliance concerning capacity constraints.

II. JONESBORO ECONOMICAL TRANSPORTATION SYSTEM DEPARTMENT

General Information

JETS operates as a service of the City of Jonesboro was created in 2005 by the Ordinance No. 3558, dated July 19, 2005 of the Jonesboro City Council.

JETS is funded by an appropriation of the city council. It also receives Federal operating and capital assistance from the appropriations of the Section 5309 program and Section 5307 urbanized area formula funds of the Federal Transit Administration. The riders of JETS fixed route and Para-transit services will also assist funding the operating expenses through paid fares. Transit Advertising makes up a small contribution towards local revenues. More information on the budgeting and funding process is provided in a subsequent section of this chapter.

Organization

JETS is a department of the City of Jonesboro, under the direction of the Transit Coordinator that has been appointed by the Mayor of Jonesboro to oversee the daily operations of the transit system. The Transit Coordinator supervises an administration staff, drivers and mechanics as necessary to maintain operations of the department. A Community Transportation Advisory Board consisting of seven members, one from each city ward and one at large, appointed by the Mayor, with each serving a three (3) year term functions in an advisory capacity for marketing /advertising, shelters, special projects, bus zones, stops and routes as well as other related issues.

JETS's administrative and operation office is located at 519 W. Washington Avenue, Jonesboro, Arkansas 72401. City Administration is located at 515 W. Washington Avenue, Jonesboro, Arkansas. Mailing address for JETS is P.O. Box 1845, Jonesboro, Arkansas 72403. Ticket sales, information, registration and scheduling are made available through JETS office or by phone at (870) 935-5387.

The local funding process, as mentioned, relies on a portion of the Jonesboro City Budget. The budget process begins in late June and starts by projecting the cost of providing the next year's service. Next, ridership revenue is forecast. An estimate of the Federal operating assistance is then made. A Federal budget is supposed to be in place on or before October 1 of each year, but in recent years, it has ranged from November to January of the next year.

The nature of the funding sources has implications for assuming JETS ability to achieve and maintain full compliance with the Para-transit requirements of the ADA. The legislative history of the ADA reveals that complementary Para-transit is seen as an interim measure, and that the intent of ADA is to create accessible fixed route systems. The thrust of ADA is to require all transit systems to replace their generally inaccessible, i.e., non-lift equipped, vehicles with fully accessible vehicles. Due to the implementation of our system being new, JETS vehicles currently meet the accessibility requirements of the ADA.

III. FIXED-ROUTE SERVICE

Fixed-Route Service

With a proposed date of June, 2006, JETS will own and operate three buses on its fixed route service with two buses serving the ADA Para-transit and priority based Demand/Response. All routes can be accessed for a fee of \$1.00. Half price fare is available for the elderly and disabled upon completion of

reduced fare application, or by presenting a Medicare card with a photo ID. Students are eligible for a \$0.75 fare.

A corridor will extend ¼ mile from the center of each fixed route. Within this corridor, all non-ADA eligible will be required to use fixed route service.

Outside of this corridor, for all passengers, JETS will operate Para-transit/Demand/Response service extending to the city limits. Fares are \$2.50 and include the passenger, a personal care attendant and one family member. Each additional person would pay the \$1.00 full fare cost. ADA eligible passengers will receive Para-transit priority within ¾ mile of any fixed route.

Each fixed route will operate accessible buses.

Costs

JETS proposed annual unit-operating cost including operators, staff, maintenance and fuel.

Personnel	\$501,500
Supplies, Maintenance, Contracts	\$102,500
Capital	\$215,000
TOTAL	\$819,000

This cost analysis is based on our proposed fixed route operation including the ADA Para-transit and work route buses, excluding administrative overhead. The labor was calculated from current wages including holidays and salary increase, but excluding overtime.

The simplicity designed within the fixed route will enable JETS to accommodate the routes with newly hired drivers much more quickly allowing us the opportunity of incrementing our training thereby reducing our cost.

Fleet

JETS fixed route system fleet inventory has the following make-up:

No. of Buses	Model Year	Condition	Type of Buses	Lift-equipped
5 ea. Ford	2006	New	ElDorado Natl	Yes
E450 Chassis		ADA Modified	Corporation	Automated

Hours and Days of Service

JETS fixed route will operate from 6:00 a.m. until 6:00 p.m. Monday through Friday and Saturday from 8:00 a.m. to 8:00 p.m. There is no Sunday service and JETS does not operate on the following holidays:

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| New Year's Day | Labor Day |
| Memorial Day | Thanksgiving Day |
| Independence Day | Christmas Day |

*JETS will provide limited service on the following holidays:
 Friday after Thanksgiving
 Christmas Eve

IV. PROPOSED PARA-TRANSIT SERVICE

Para-transit Implementation

JETS is carefully structuring its Para-transit operational plan to assure full compliance with ADA. JETS has established a priority based plan to maximize its service potential while remaining within the regulations guidelines established by the Federal Register.

JETS recognizes that the minimum corridor for complementary Para-transit service is $\frac{1}{4}$ of a mile either side of the fixed route. JETS wishes to expand on this service minimum by making some degree of Demand/Response service available to all riders.

JETS is requiring that all non-ADA eligible riders within $\frac{1}{4}$ mile of the fixed route utilize the fixed route system for transportation.

Priority based ridership will begin by providing complementary Para-transit service to all ADA eligible passengers within the $\frac{1}{4}$ mile corridor first. With service time remaining, our final obligation will be towards providing Demand Response to all riders within the city limits of Jonesboro.

When assembling a schedule, JETS will attempt to comply with each rider's request. The priority-based plan is designed as a safety net to assure our department the ability to comply with the capacity constraints regulations as outlined in the Federal Register.

JETS will utilize a Para-transit/Demand Response system to provide curb-to-curb service.

Financial Base for Para-transit

JETS financial bases are the same for the fixed route and the Para-transit/Demand Response programs. The quantity of units in service coupled with the proposed work schedule was created from the 2005-06 budget appropriations. JETS will provide a five year projected budget upon the request of FTA. A projected budget was not included on the basis of implementation with full ADA compliance.

V. ELIGIBILITY PROCESS

The ADA defines who has civil right to the comparable paratransit system. The law requires JETS to establish a procedure to determine ADA Para-transit Eligibility. A person who is eligible is termed "ADA Para-transit Eligible". To determine who is an "ADA Para-transit Eligible," JETS intends to use procedures recommended in the "ADA Paratransit Handbook," (September 1991 - published by the Urban Mass Transportation Administration [now FTA]. It is recognized that the language of the law is complex and difficult to interpret. The Handbook recommends that a multi-step "test" be applied to determine eligibility. It is important to note that under ADA, eligibility does not really apply to an individual, but it applies to an individual and the circumstances of their desired trip. Even though a person may be generally thought of as having a disability, if their trip begins or ends outside the Para-transit Service Area, then there is no ADA Para-transit Eligibility.

Eligibility language from the ADA regulations and statute

ADA's Para-transit service is mandated only for persons with narrow categories of disabilities:

1. Any individual with a disability who is unable, as the result of a physical or mental impairment (including a vision impairment), and without the assistance of another individual (except the
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operator of a wheelchair lift or other boarding assistance device), to board, ride, or disembark from any vehicle on the system which is readily accessible and to usable individuals with disabilities.

2. Any individual with a disability who needs the assistance of a wheelchair lift or other boarding assistance device and is able, with such assistance, to board, ride and disembark from any vehicle which is readily accessible to and usable by individuals with disabilities if the individual wants to travel on a route on the system during the hours of operation of the system at a time, or within a reasonable period of such time, when such a vehicle is not being used to provide designated public transportation on the route.
3. Any individual with a disability who has a specific impairment-related condition which prevents such individual from traveling to a boarding location or from a disembarking location on such system.

Architectural barriers not under the control of the public entity providing fixed route service and environmental barriers (e.g., distance, terrain, weather) do not, standing alone, form a basis for eligibility under this paragraph. The interaction of such barriers with an individual's specific impairment-related condition may form a basis for eligibility under this paragraph, if the effect is to prevent the individual from traveling to a boarding location or from a disembarking location.

In other words, ADA attempts to establish a definition of a functional disability, rather than a permanent individual determination. A person may be ADA Para-transit Eligible initially because they are a wheelchair user and their nearest bus route is not lift-equipped. However, over time as the bus service becomes fully accessible, the person would be able to access the fixed-route service and would no longer be ADA Para-transit Eligible.

Prior to scheduling any trip, JETS, through the Para-transit dispatching staff, will first make the determination that the trip is within the ADA Para-transit Service Area. If the trip passes that test, then the four functional eligibility recommended by the handbook are as follows:

1. Does the individual's disability prevent getting to and from a bus stop at point of origin or destination?
2. Can the individual board and utilize the vehicle at the stop?
3. Can the individual recognize the destination and disembark?
4. If the trip by fixed route involves a transfer or other connection, are the paths between the routes accessible and navigable by the individual?

JETS obtains professional staff to take information over the phone, through the mail, and via the Telecommunications Relay Service (TRS). The toll free relay service can be accessed by dialing 711. Please refer to the ADA Para-transit Eligibility Application that is available at the JETS office.

In some cases it may be necessary to request authorization to receive information or certifications from the applicant's physician, therapist, or other professional familiar with any medical or physical conditions giving rise to a functional disability. This procedure will be used only when necessary, and all efforts will be made to avoid a financial burden on the applicant. Further, any information so obtained will be kept confidential to the maximum extent possible.

Applications will be available from JETS at JETS office. Applications can be returned via mail to JETS. Initial certification recommendation will be made by the staff at JETS, and if required, followed by documentation from a physician. All approvals and denials will be reviewed by JETS staff prior to notification. If ADA Para-transit Eligibility is denied on an individual basis, a written reason will be provided. The Certification Process will take no more than twenty-one (21) days after the submission of a properly completed application. If for some reason certification takes longer than 21 days, then temporary eligibility will be established until certification is complete.

JETS will provide ID documentation, upon the request of the applicant, which may be utilized for travel in other cities with Para-transit systems.

Appeal Process

If a person is declined for either an individual trip or ADA Para-transit Eligibility, that person has a right to appeal the decision to a person not involved in the initial denial of eligibility. Appeals should be made in writing to the Transit Coordinator of JETS:

Transit Coordinator
JETS
P.O. Box 1845
Jonesboro, AR 72403

The Transit Coordinator or his designated representative will conduct a review of the denial and the appellant's application and any additional information that may be provided by the appellant, such as physician's or therapist's certifications. The Transit Coordinator may review the appeal with the Community Transportation Advisory Board, the JETS Board, and request non-binding recommendation from same. Appeals will be decided in writing and within thirty (30) days of the filing of the appeal. If a decision is not rendered within thirty days, then presumptive eligibility will be established until the appeal process is used.

The appellant will have the right to be heard in person and to have interpretive support if required. The appellant can be represented or assisted by a third party, including an attorney or a counselor.