



## Beyond the ADA Policy

### Background

As a fixed-route transit provider, IPTC is required to provide accommodations for individuals who cannot access its fixed route system, as required by the American with Disabilities Act (ADA) of 1990. The accommodation is defined as providing complementary door-to-door service within  $\frac{3}{4}$  of a mile of a fixed route for individuals who are determined to be eligible, among other requirements. For Indianapolis, this service is called Open Door.

In 2018, IPTC's contractor-operated complementary ADA paratransit service, branded Open Door, experienced a significant performance drop which resulted in numerous customer complaints and negative media attention. The significant performance issues and the gap between the last time IPTC evaluated its service, led the (then) IPTC Board of Directors to commission a comprehensive study of its Open Door service. The study, named the Paratransit Operational Analysis (POA), was led by the KFH Group of Bethesda, MD, with assistance from the Palo Consulting Group and The McCormick Group. Beginning in May 2019, the POA examined ADA paratransit in Indianapolis through a series of tasks. The POA solicited input from Mobility Advisory Committee (MAC) members, agencies who provide services to individuals with disabilities, key stakeholders, and riders (through a rider survey). The study also involved a detailed dive into Open Door operations and performance data. A steering committee was established that included members of the MAC and the IPTC Board of Directors. The POA Steering Committee provided valuable feedback to the project team throughout the study process. The study was accepted by the Board of Directors at the June 25, 2020 meeting. On July 27, 2020, the IPTC Board of Director's accepted the recommendation for IPTC staff to continue the conversation about the area outside the ADA with the disabled community, as recommended in the POA.

IPTC staff hired a facilitator, the McCormick Group, to assist in the public outreach. A Task Force was formed of individuals chosen by agencies that represent individuals with disabilities. The Task Force reviewed the outreach plan and provided additional thoughts.

### Community Meetings and Response

Public meetings, both virtual and in-person, were scheduled in March and April 2021. The public meetings were 90-minute, facilitated meetings to discuss several topics, including what a new service type should look like in the non-ADA. A webpage on the IPTC website was created to communicate the process and a brief background video was uploaded; after the first meeting, a dynamic map was uploaded with the ADA area to show people where the ADA area is located. Additional meetings were held with stakeholders and public outreach meetings concluded in April. Following the meetings, IPTC staff met to discuss the feedback and develop a policy for the new service type in the non-ADA area. The policy was distributed to the Task Force and the

IPTC Board of Directors. A second Task Force meeting was convened by IPTC staff and facilitated by the McCormick Group.

The draft policy was posted on the webpage and a comment form included to allow for public comments on the draft policy. A panelist discussion was recorded and embedded into the webpage, which answered many of the frequently asked questions (FAQs). The draft policy was presented to the IPTC Board of Director’s at the August Service Committee and the August Board of Director’s meeting, to inform the board but also solicit additional comments from the public, especially the disabled community.

## Beyond the ADA Service Profile and Policies

The Beyond the ADA service profile will apply to any trip where the origin or destination is more than ¾-mile from a fixed-route bus service, as revised from time-to-time. The Beyond the ADA service profile will not apply to ADA-eligible clients that live within the required ¾-mile ADA area, provided that 1) the client’s trip is to and from destinations within the required ¾-mile ADA area, and 2) the client doesn’t move outside of the required ¾-mile ADA area once this new service profile becomes effective. Clients residing and traveling within the ¾-mile ADA area will continue to receive the ADA-mandated service level once this new service profile becomes effective.

Table 1. Beyond the ADA Draft Policies

Policy Component	Beyond the ADA Service Profile	Background/Rationale
<b>Service Area</b>	The boundary for the Beyond the ADA service profile will be the area in Marion County that is outside the required ADA area, defined as ¾-mile on either side of an IndyGo fixed bus route, as revised from time-to-time.	Trips to, from, or within the non-ADA area negatively affect the performance of trips in the required ADA area. The POA recommended, and staff agrees, that the required ADA area and the non-ADA area should have different service profiles.
<b>Span or Service Hours</b>	<ul style="list-style-type: none"> <li>- Monday through Saturday - Start time will coincide with the first bus pull out for the day (any route) and end at 10 pm</li> <li>- Sundays and Observed Holidays - Start time will coincide with the first bus pull out for the day (any route) and end at 8 pm</li> </ul>	For non-ADA trips from November 2020 to March 2021, approximately 3.7% of trips occurred after 10 pm; for all users in the same time period, approximately 3% of all trips occurred after 9 pm. Given the relatively low demand during the late night hours, staff recommends that the span of service (i.e. service hours) for the Beyond the ADA policy area no longer be tied to the span of service offered by IndyGo’s fixed-route service where no fixed-route service exists.
<b>Fares</b>	Trips to, from, or within the Beyond the ADA service area will be charged a premium fare equal to four times the base fixed-route	Trips with origin, destination, or both in the non-ADA area (i.e. Beyond the ADA service area) tend to be longer and more difficult to serve. The higher price reflects the premium

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	fare; currently that price would be \$7.00 (\$1.75 x 4). Future increases to the fixed-route base fare will result in an increase to this premium fare as well.	nature of this service. The fare is tied to the fixed-route base fare to simplify implementation of the fare.
<b>Trip Purpose</b>	No trip purpose prioritization	Prioritizing or restricting to a specific purpose is cumbersome and difficult to enforce; therefore, Staff has elected to not introduce trip denials based on trip purpose.
<b>Capacity Constraints</b>	Although IndyGo will make every effort to accommodate all trip requests, for the Beyond the ADA service profile, IndyGo will exercise its ability to deny trips when capacity to serve the non-ADA area becomes constrained.	Because the Beyond the ADA service profile will exist outside the ADA rules and regulations, trip denials may occur on a limited basis. Staff elected this approach to mitigating impacts to services within the required ¾-mile ADA service area over trip caps for individuals or the program as a whole.
<b>Anticipated Adoption Date</b>	September 23, 2021	Staff intends to introduce these policy changes at the regularly scheduled August 26, 2021 IPTC Board of Director’s meeting and seek action from the Board at its September 23, 2021 meeting.
<b>Effective Date</b>	January 1, 2023	In community meetings, we heard that beginning a policy at the beginning of the year would be easy to communicate and remember for clients.
<b>Grandfathering</b>	<p>Current eligible clients will continue to receive the services they receive today at their established address as of October 31, 2022, until one of the following happens (whichever is first):</p> <ol style="list-style-type: none"> <li data-bbox="406 1444 812 1549">1. January 1, 2025; or</li> <li data-bbox="406 1549 812 1696">2. A client moves from its current residence to anywhere else within the county; or</li> <li data-bbox="406 1696 812 1877">3. The client loses its ADA eligibility.</li> </ol>	<p>This provision would give current eligible clients time to adapt to the new Beyond ADA policy.</p> <ol style="list-style-type: none"> <li data-bbox="812 1444 1408 1549">Two years from the effective date. In community meetings, we heard that one year was too short, but five years was too long.</li> <li data-bbox="812 1549 1408 1696">The individual no longer benefits from grandfathering because the individual is no longer at the residence that was grandfathered.</li> <li data-bbox="812 1696 1408 1877">If the individual loses eligibility, the client may re-apply; but will be subject to, the Beyond the ADA policy. Individuals are given a 14-day grace period to maintain their grandfathered status.</li> </ol>

An eligible client can be brought into the ADA service area and receive ADA service.

### Introduction of Same-Day Service

Same-day service on IndyGo vehicles would be implemented, as vehicle capacity and schedules allow. The specific policies and procedures for IndyGo's same-day service will be drafted by IndyGo's Mobility Solutions staff. The same-day service would be available first to individuals in the non-ADA service area. For this premium service, a higher fare would be charged; the fare for same-day service would be \$10.00. We heard in community meetings that individuals would rather have fares be as convenient as possible; fares that require change to be carried by the passenger is not convenient. Therefore, fares are designed to reduce the number of bills and change carried.