

ACCESSIBILITY STANDARDS DEVELOPMENT PROPOSAL

I. BACKGROUND

Over fifteen years have passed since the enactment of the Americans with Disabilities Act (ADA) requiring transit operators to offer paratransit service, as well as accessible fixed-route services, to people with disabilities. APTA and the public transportation industry continue to play a key role in the implementation of the ADA. APTA members remain dedicated to providing mobility options for all persons, especially those with disabilities. Transit operators have been making their vehicles, facilities and services accessible and providing complimentary paratransit services. Despite increased accessibility of fixed-route services, demand for paratransit services has skyrocketed in the last fifteen years. For example, over the period from 1993 to 2003, the number of paratransit passengers served nationwide rose by 37 percent, and vehicle miles traveled to serve them has increased by 113 percent. While this increase in mobility has been extremely beneficial to many persons with disabilities and the communities in which they travel, it has had an obvious impact on transit agencies' budgets as capital costs for paratransit services rose by 163 percent, and operating costs increased nearly 200 percent in the same time period. In 2003, transit agencies spent \$2.36 billion (representing 8.8 percent of their operating budgets) on paratransit services for 110.8 million riders.

APTA's Access Committee has been in the forefront of the association's efforts to address the broad range of mobility issues for people with disabilities, seniors and the transportation disadvantaged. Through several subcommittees, including ADA paratransit; accessibility (across all modes); senior transportation; wheelchair securement and mobility devices; and technology, the access committee has identified key areas in ADA paratransit requiring definitions in terminology (see Attachment A).

Given increasing regulatory guidance which often results in increased operating and capital costs borne by transit agencies, the range of accessibility issues go beyond the provision of ADA paratransit services. The committee works closely with the bus and paratransit operations, commuter rail, rail transit, policy and planning, legal affairs and legislative committees on a variety of issues, including, level boarding platforms in new commuter rail and intercity rail stations; intercar barrier alternatives; origin-to-origin destination service; rear-facing wheelchair securement systems; and the use of "segways" on transit vehicles, among others. The committee has also worked closely with organizations involved in standards development for wheelchair securement and mobility devices including the American National Standards Institute (ANSI) and Rehabilitation Engineering and Assistive Technology Society of North America (RESNA).

In 2005, the Access Committee initiated discussions on the need to establish a relationship with APTA's Standards Development Council (SDOC), particularly with regard to the availability of resources for standards-related activities and the priority of needed standards and/or recommended practices for accessibility issues covering all

modes of public transportation. At its November 30, 2005 meeting, the SDOC acknowledged the importance of these issues and urged the development of a proposal to initiate this process. It is in this regard that this proposal has been generated to establish a multi-disciplinary committee (comprised of representatives of APTA's Access, Bus & Paratransit Operations, Small Operations, Commuter Rail, Rail Transit, Policy and Planning and Legal Affairs Committees among others) to serve as the policy and planning committee for the development of transit industry accessibility standards, and to authorize the initiation of activities needed to support the standards development process.

II. PROJECT PURPOSE

The purpose of this project is to authorize and initiate the development of accessibility standards and recommended practices for the transit industry. This approach will include the identification and prioritization of accessibility standards that the industry feels would be useful and appropriate and to focus on those areas that will strengthen the health and effectiveness of the industry.

III. SCOPE OF PROJECT

Four specific tasks are proposed:

- Task 1 Establish a multi-disciplinary committee (comprised of representatives of APTA's Access, Bus & Paratransit Operations, Small Operations, Commuter Rail and Rail Transit Committees among others) as APTA's accessibility policy and planning committee to lead the development of industry accessibility standards and recommended best practices and to provide guidance to the accessibility working groups.
- Task 2 Identify and prioritize the accessibility standards and recommend practices most needed by the transit industry.
- Task 3 Recommend the most suitable process for developing each standard or recommended practice.
- Task 4 Execute the standards development process for industry accessibility standards and recommended practices.

IV. SPECIFIC TASKS

Task 1 – Establish a multi-disciplinary committee (comprised of representatives of APTA's Access, Bus & Paratransit Operations, Small Operations, Commuter Rail and Rail Transit Committees among others) as the Accessibility Standards Policy and Planning Committee

Based on experience gained in prior transit industry standards development activities, APTA has learned that standards and recommended practices will be much more easily and widely accepted if industry leaders play an oversight role in the standards development process.

As part of Task 1, the accessibility standards policy and planning committee will develop the appropriate process, procedures, budget and bylaws needed to set policy and provide guidance to the accessibility standards working groups and the development of proposed standards and recommended practices. An objective of this task is to ensure transit industry buy-in and support for the development of accessibility standards. Completion of the task will also facilitate a more efficient and broader implementation of the standards by the industry.

In addition, the accessibility policy and planning committee will establish an Accessibility Standards Oversight Committee. The committee will be charged with reviewing the standards and recommended practices developed by the working groups for their technical content and workability.

To ensure there is not a conflict between the accessibility standards development work and the modal and other standards development activities, a comment/feedback process will be established between the accessibility policy and planning committee and APTA's modal and other policy and planning committees. Their input and comments will be solicited initially on the standards need that have been identified and their priority, and at the end of the process before standards and recommended practices are finally adopted.

Task 2 – Identify and Prioritize Standards and Recommended Practices (Needs Assessment)

The accessibility standards policy and planning committee will utilize APTA's Access Committee, Bus & Paratransit CEOs Committee, Bus Operations Committee, Bus Maintenance Committee, Small Operations Committee, Commuter Rail CEOs Committee, Rail Transit CEOs Committee (and relevant Technical Forums), Policy and Planning Committee, Legal Affairs Committee, and Research and Technology Committee to obtain input on transit accessibility standards needs in their area of practice and expertise. If an existing standards development organization has existing standards that could easily be adapted to apply to the transit industry, that organization will be included in the survey. The accessibility standards policy and planning committee will also ensure that input is received from both the public and private sectors as well as representatives of public interest, disability and consumer organizations. As noted above, input from the modal and other standards policy and planning committees will be sought in the needs assessment process.

The deliverable for Task 2 will be a prioritized list of transit industry accessible standards needs.

Task 3 – Determine Most Suitable Process for Developing Each Standard and Recommended Practice

The accessibility standards policy and planning committee will determine the most suitable process for the industry to develop each of the standards on the prioritized list. These processes include the development of standards, recommended practices, guidelines and white papers. A white paper is informative, guidelines are a template, recommended practices are recommended but not required, and a standard allows little or no deviation.

All recommended processes shall:

- be open to broad participation;
- be consensus-based;
- include formal comment and balloting procedures;
- allow easy and economical access to published standards; and
- include procedures to change and interpret approved standards

Where an existing standards development organization is well positioned to assist the industry in developing a particular standard, the working group will strongly consider using that organization. The working group will consider all existing recognized standards development organizations when making a recommendation for the best process for the development of a particular standard.

The deliverable of Task 3 will be the identification of the process to be used to develop each of the standards on the prioritized list of standards needed by the industry. Included for each of the standards will be a program management plan that identifies:

- estimated cost to develop the standard;
- available industry volunteers to participate on the standards development committees;
- the availability or willingness of standards development organizations to assist the industry; and
- the impacts to the transit industry and stakeholders of the resultant standard.

Task 4 – Execute Transit Industry Accessibility Standards Development Program

Transit industry volunteers with the proper background will be recruited to populate the accessibility standards working groups and the accessibility standards oversight committee as identified in the program management plan. APTA will hire the necessary consultants to facilitate the work of the accessibility standards working groups, as required, and will provide program management to track the budget and schedule for standards development.

The specific steps that the accessibility standards working groups will follow will include:

- recruit industry volunteers for each technical working group
- hold initial meeting of each technical working group to develop work plans
- complete an outline of each proposed standard/recommended practice
- use the outline to make individual work assignments to technical working group members
- individual technical working group members will complete their assignments
- the individual writing comments will be integrated into a first draft proposed standard
- the proposed standard or recommended practice will be posted for comment by the entire membership of the technical working group working on that standard or recommended practice
- all comments received from the technical working group will be resolved
- a second version of the standard or recommended practice will be balloted to the technical working group using APTA's established balloting procedures
- the standard or recommended practice approved by the technical working group will be presented to the accessibility standards oversight committee for review and comment
- using SDOC procedures, the technical working group will resolve any issues raised by the oversight group
- the accessibility standards policy and planning committee will ask any relevant APTA standards policy and planning committees for comments before voting on the implementation of the standard by the industry.
- APTA/SDOC will make the approved and leadership-authorized standard available for use by the industry.

To successfully accomplish these objectives will require broad-based transit industry participation from the public and private sectors, and representatives of public interest, disability and consumer organizations.

V. BUDGET

It is proposed that a total of \$99,489 be reserved for the development of transit industry accessibility standards during FY2007. Based on APTA's prior standards development efforts, this budget could support a modest standards development effort. The number of standards developed would depend on how the standards development committees decided to organize the work. The effort could be organized to produce a few larger standards or several smaller standards.

The proposed level of funding for FY2007 would cover the following types of expenses:

- APTA staff labor
- APTA staff benefits
- Meeting expenses
- Office expenses
- APTA G & A

- Working group travel
- Staff travel
- Consultants

A more detailed budget for the development of accessibility standards will be provided when the accessibility standards policy and planning committee completes its organizational tasks and identifies a prioritized list of standards to be completed.

The accessibility standards policy and planning committee will develop the appropriate annual budget and work plan for submission to the SDOC to support subsequent accessibility standards development activities.

VI. PROPOSED ROLES OF MAJOR PLAYERS

APTA

APTA will provide overall project management, including drafting of required reports, budgets and other documents for consideration by the accessibility standards policy and planning committee. APTA will use its existing industry committee structure to recruit volunteers for the following groups necessary to complete this project:

- Accessibility standards working groups
- Accessibility standards oversight group

APTA will identify other stakeholders including representatives of public interest, disability and consumer organizations for input into this process.

APTA will identify the need for any consulting help required and will hire qualified consultants. APTA will reach agreements with standards development organizations identified as well positioned to meet some of the industry's accessibility standards needs.

APTA will make arrangements for technical working group meetings and conference calls necessary to complete development of the standards. APTA will publicize and make the products of this project available to the industry.

Transit Industry

Transit industry public and private sector members will provide volunteers to staff all of the groups necessary for the development of industry accessibility standards.

Consultants

On an as-needed basis, consultants may be hired to provide crucial expertise or standards drafting assistance to the accessibility standards working groups.

VII. SCHEDULE

Following SDOC approval of the proposal to establish a multi-disciplinary committee to serve as APTA's accessibility standards policy and planning committee, work will begin on the establishment of bylaws, development of a plan to obtain industry input on accessibility standards development needs and the prioritization of those needs. It is anticipated that the schedule for completion of the following tasks will be:

- Delivery of development process recommendations (August 2007)
- Delivery of prioritized list of accessibility standards needs (November 2007)

Based on APTA's prior standards development experience, the first standards should be ready for balloting 15 – 18 months after establishment of the accessibility standards policy and planning committee. The standards development process flow will remain steady for another 18 months and begin to slow down. A total of 48 months is not unrealistic for consensus-based process involving volunteers.

ATTACHMENT A – ADA PARATRANSIT STANDARDS NEEDS (Definitions of Terminology)

Reservations

- % of phone calls receiving busy signals by hour
- Average initial hold time per call by hour
- % of call time spent on hold (initial and secondary)
- Number of one-way reservation requests permitted per phone call
- Number of minutes required between individual reservation requests (minimum elapsed minutes between one pick-up and the next scheduled pick-up)
- Number of minutes prior to reservation that trip can be canceled without penalty
- Penalty for “late cancels”
- Minimum and maximum response time for same day requests due to agency error
- Definition and standards for “will call” reservations
- Definition of reservations scheduling “negotiations”

Dispatch

- Average delay in radio response per hour
- Definition of maximum acceptable ride time

Road Operations

- Definition of on-time arrival window (minutes early or minutes late)
- Minimum definition of boarding and aligning assistance (level of operator assistance to passengers)
- Minimum definition of curb-to-curb service
- Minimum definition of door-to-door service
- Definition of line of sight and operator control
- Minimum definition of dwell time
- Definition of safe and appropriate pick-up location
- Definition of minimum acceptable pick-up location
- Minimum definition of acceptable transfer location
- Definition of a passenger no-show
- Definition of a an agency no-show
- Minimum package and carry-on policy
- Definitions of maximum acceptable ride time
- Definition of when and where transfers may be required
- Definition of a missed trip
- Definition of a late arrival (don't arrive at appointed time)