

## **OFFICE OF THE CITY AUDITOR**

City and County of Honolulu  
State of Hawai'i

# **Audit of the City's Paratransit Service**





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# Audit of the City's Paratransit Service

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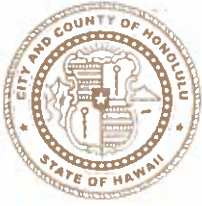
A Report to the  
Mayor  
and the  
City Council  
of Honolulu

Submitted by

**THE CITY AUDITOR**  
CITY AND COUNTY  
OF HONOLULU  
STATE OF HAWAII

Report No. 16-02  
March 2016





**OFFICE OF THE CITY AUDITOR  
CITY AND COUNTY OF HONOLULU**

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EDWIN S.W. YOUNG  
CITY AUDITOR

March 4, 2016

The Honorable Ernest Y. Martin, Chair  
and Members  
Honolulu City Council  
530 South King Street, Room 202  
Honolulu, Hawai'i 96813

Dear Chair Martin and Councilmembers:

A copy of our final report, *Audit of the City's Paratransit Service*, is attached. This audit was conducted pursuant to City Council Resolution City Council Resolution 14-69, FD1, *Requesting the City Auditor to Perform a Comprehensive Management and Performance Audit of the City's Paratransit Service*. The resolution, which was adopted by the City Council on May 7, 2014, requested that the city auditor examine many issues, including those raised in the *August 2010 Short Range Transit Plan Existing Conditions Report*. In the resolution, Councilmembers expressed concerns over the varying paratransit issues that have arisen and continued over the years, and for the audit to assess the city's ability to meet future paratransit challenges and demands in compliance with federal American's with Disabilities Act (ADA) regulations.

### **Background**

***Americans with Disabilities Act (ADA) of 1990:*** Under the ADA, each public entity operating a fixed-route system must also provide paratransit or other special service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed route system. Because the City & County of Honolulu operates a fixed-route system (TheBus), it is required to provide a complementary paratransit service.

***Roles and Responsibilities:*** Currently, there are three primary entities that comprise the city's paratransit system of service.

- The Department of Transportation Services (Public Transit Division) (DTS) is responsible for providing public transit (TheBus) and paratransit services (Handi-Van) on the island of O'ahu. For Handi-Van services, DTS provides equipment; procures paratransit vans, and reviews and oversees OTS. The Handi-Van program was transferred to the Department of Transportation Services in 1996, when ridership was close to 700,000 trips per year.

- The Oahu Transit Services, Inc. (OTS) provides both the public transit fixed route bus, and the paratransit services on behalf of the city. In 1997, the city council directed that the Handi-Van management and operations contract be given to the OTS. OTS provides the employees to operate and manage the both systems, and the city reimburses OTS for the operating expenses.
- DTS uses a contractor, Innovative Paradigms, to determine if users are eligible for paratransit services in accordance with the Americans with Disabilities Act of 1990. DTS implemented the in-person eligibility determination program in 2009.

### **Audit Results**

OTS implemented several improvements. It increased its fleet size, improved the availability of Handi-Van vehicles; increased the use of supplemental taxis; and implemented 14 of 18 recommendations listed in the Short Range Transit Operations Plan of May 2012. Despite implementing these initiatives, OTS Handi-Van on-time performance has declined 5% over the past three years; customers experience *excessive* trip times; and paratransit operations do not fully comply with ADA requirements.

Requests for demand services are difficult to meet and the operational deficiencies exist because OTS has not made full use of scheduling and dispatching technologies; needs to fully implement real-time scheduling; and needed to solve MDT failures that adversely impacted paratransit operations. OTS needs to operationally comply with ADA requirements related to subscription trip volume (ADA limit is 50% of capacity); minimize trying to provide services not required by ADA; and improve internal controls over subscriptions so demand services can be filled. Absent these improvements, OTS operations will continue to be inadequate to support current customer demand; operating costs will continue to increase; and potential revenues will not be collected.

Paratransit revenues are insufficient to sustain the program services. The last fare increase occurred in 2001. Program costs total \$40 per trip and users are charged \$2 per trip. This amounts to \$40 million per year in operating costs versus revenues of about \$1.7 million per year (less than 5% fare box recovery rate). In our opinion, paratransit revenues can be increased. Subscription and demand user fares can be increased, and agencies, in particular, can be charged the full costs or higher fares for the service.

### **Recommendations**

Our recommendations include DTS directing OTS to comply with ADA requirements in areas such as capacity constraints and trip purpose restrictions. They include subscription management, on-time performance, trips with excessive trip times, volume of agency customers, and prioritizing agency trips. OTS needs to reduce the number of *No Solution Found* and *Unscheduled* trips by improving its use of the trip scheduling (*Trapeze*) computer system, putting more of its operations on real-time scheduling, and eliminating the reliance on manually amending trip runs.

The Honorable Ernest Y. Martin, Chair  
and Members  
March 4, 2016  
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DTS and OTS need to establish formal policies, procedures, and application process for its subscription program; implement a monitoring program to ensure that subscription levels do not exceed 50% of capacity as required by ADA; adhere to the ADA minimum 3/4-mile service area for Handi-Vans or charge extra for the service; and enforce conditional eligibility restrictions.

OTS needs to track, report, and establish performance benchmarks; develop an action plan to mitigate excessive trip times; and establish a formal Customer Satisfaction/Service Quality Program that obtains direct customer feedback. OTS should also continue to manage and expand taxi-based resources to supplement operations, monitor Mobile Data Terminal (MDT) performance, and recover applicable costs related to MDT deficiency corrections.

DTS needs to improve oversight of OTS and develop a comprehensive five-year plan for managing the paratransit fleet; establish a tiered fare structure that charges more for agency trips, out-of-service area trips, and other premium services not required by the ADA. DTS should conduct annual audits as required by ROH. Additionally, DTS should assess the need, frequency and scope of the annual audit requirement and, if applicable, seek amendments to the ordinance.

The City Council should amend Revised Ordinances of Honolulu to increase the paratransit system fares; improve the cost recovery ratio; and separate the fixed-route and paratransit operations.

We express our appreciation for the cooperation and assistance provided us by the managers and staffs of DTS, OTS, Innovative Paradigms, Citizens for a Fair ADA Ride (CFADAR), and the many others who assisted us during the audit. We are available to meet with you and your staff to discuss the review results and to provide more information. If you have any questions regarding the audit report, please call the auditor-in-charge, Troy Shimasaki, or me at 768-3134.

Sincerely,

  
Edwin S.W. Young  
City Auditor

c: Kirk Caldwell, Mayor  
Roy Amemiya, Jr., Managing Director  
Michael Formby, Director, Department of Transportation Services  
Nelson Koyanagi, Jr., Director, Department of Budget and Fiscal Services  
Troy Shimasaki, Senior Auditor





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# Chapter 1

## Introduction and Background

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This audit was conducted pursuant to City Council Resolution 14-69, FD1, *Requesting the City Auditor to Perform a Comprehensive Management and Performance Audit of the City's Paratransit Service*. The resolution, which was adopted by the City Council on May 7, 2014, requested that the city auditor examine several issues, including those raised in the *August 2010 Short Range Transit Plan Existing Conditions Report*. In the resolution, councilmembers expressed concerns over the varying paratransit issues that have arisen and continued over the years, and for the audit to assess the city's ability to meet future paratransit challenges and demands in compliance with the federal American's with Disabilities Act (ADA) regulations.

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### Background

**Americans with Disabilities Act of 1990:** Under the ADA, each public entity operating a fixed-route system must also provide paratransit or other special services to individuals with disabilities. The services must be comparable to the level of service provided to individuals without disabilities and who use the fixed route system. Because the City and County of Honolulu operates a fixed-route system (TheBus), it is required to provide a complementary paratransit service. This complementary paratransit service must meet ADA requirements which are detailed in Exhibit 1.1.

### Exhibit 1.1 Americans with Disabilities Act (ADA) of 1990 Requirements

<i>ADA Requirement</i>	<i>Description</i>
Hours and days of service	Service should be available throughout the same hours and days as the entity's fixed-route service.
Service area	Service area should include origins and destinations within corridors within a ¾-mile radius of the fixed-route service.
Trip reservations and response time	City should schedule and provide paratransit service to any ADA paratransit eligible person at any requested time on a particular day in response to a request for service made the previous day. Reservation service should be available during normal business hours. Pick-up times may be negotiated with individuals to within +/- one hour of the requested pick-up time. Real-time scheduling may be used to provide complementary paratransit service (not required). Advanced reservations may be made up to 14 days in advance.
Fares	Fares for complementary paratransit service shall not exceed twice the fare that would be charged to an individual taking a comparable trip on the fixed-route system.
Operating without regard to trip purpose	This means an entity cannot impose restrictions or priorities based on trip purpose (e.g. prioritizing a work trip over a shopping trip).
Avoiding capacity constraints	Service capacity ensures that entities do not limit the availability of complementary paratransit service to eligible riders (e.g. no restrictions on the number of trips and individual may be provided, no wait lists for access to service, or no operational pattern or practice that significantly limits the availability of service).

Source: U.S. Department of Transportation Circular FTA C 4710.1

**History of Honolulu Paratransit Service:** The Handi-Van service began in 1977 as an advance-reservation, curb-to-curb paratransit service for persons with disabilities who were unable to ride city buses. The city initially retained a contractor (Dial-A-Ride, Inc.) to manage and operate the Handi-Van service and paid the contractor on a per-trip basis. During that first year, the service was operated only in urban Honolulu, with six vehicles providing about 100,000 trips, most of which were agency-based subscription trips.

In 1992, the responsibility for the Handi-Van was transferred from the Department of Transportation Services (DTS) to the newly created Honolulu Public Transit Authority (HPTA). Other changes included the payment structure, which changed from per-trip to per-hour rates. The first contractor, Mayflower, operated city-owned vehicles and used taxi companies to augment its fleet. In 1996, the HPTA was dissolved and the Handi-Van program was

returned to DTS. Ridership in 1996 was close to 700,000 trips per year.

In 1997, the city council directed that the management and operations contract be given to the Oahu Transit Services, Inc. (OTS), which also operated the public transit, fixed route service (TheBus). OTS has operated the Handi-Van ever since.

Prior to 2009, Handi-Van eligibility was processed by DTS staff. In 2009, DTS implemented an in-person eligibility determination program and contracted with Innovative Paradigms to conduct eligibility reviews.

### ***Current Roles and Responsibilities***

Currently, there are three primary entities that comprise the city's paratransit system of service. The Department of Transportation Services is tasked with management and oversight of paratransit services. The Oahu Transportation Services, Inc., by ordinance, operates the paratransit service on behalf of the city. Innovative Paradigms was contracted by DTS to conduct Handi-Van eligibility determinations.

**Department of Transportation Services:** The Department of Transportation Services' Public Transit Division is responsible for providing public transit fixed route (TheBus) and paratransit services (Handi-Van) on the island of O'ahu. DTS plans and directs the city's public transit system, establishes policies for the operation of the fixed routes, reviews established routes, and determines if any adjustments are required. DTS provides equipment and buses for the system, and oversees Oahu Transit Services, Inc. (OTS).

For Handi-Van services, DTS provides equipment; procures paratransit vans; and reviews and oversees OTS. DTS uses a contractor, Innovative Paradigms, to determine if users are eligible for paratransit services in accordance with the Americans with Disabilities Act of 1990. DTS oversees both OTS and Innovative Paradigms, and responds to recommendations, complaints and questions received from the community and public officials.

**Innovative Paradigms:** Innovative Paradigms<sup>1</sup> was contracted by DTS to conduct in-person assessments to determine if users are eligible for ADA paratransit Handi-Van service. Since 2009, DTS has paid \$1.2 million annually for Innovations Paradigms to conduct eligibility determinations (\$6.1 million over the last five years). Specifically, Innovative Paradigms is tasked to:

- Conduct in-person assessments;
- Provide written determinations;
- Identify and train qualified applicants to use fixed route transit (TheBus);
- Provide documentation of eligibility determinations; and
- Utilize the city's scheduling and dispatch computer system to monitor trends and volumes

**Oahu Transit Services, Inc.:** The city uses OTS to operate the city's bus and paratransit systems. OTS provides the employees who operate and manage the paratransit, as well as the bus, systems. The city reimburses OTS for the operating expenses. The operating agreement includes a provision that the city furnishes, but retains title to the transit buses, paratransit buses, properties, facilities and equipment used in the systems. Revenues collected by OTS, excluding management fees, are the property of the city and remitted to a deposit account controlled by the city.



***In FY 2015, the Handi-Van transported 1,044,872 passengers on 1,068,634 trips.***

Source: Office of the City Auditor

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<sup>1</sup> Innovative Paradigms also has a contract with DTS to oversee the Mobility Management Center. The program was the result of the Human Services Transportation Coordination Plan 2009. The program seeks to improve transportation options for older adults, individuals with disabilities, and persons with low incomes. This is a separate program from the Handi-Van service.

OTS operations are governed by a seven-member Oahu Transit Services Board of Directors. Exhibit 1.2 indicates that, as of September 2015, OTS had 356 staff to support paratransit operations, with plans to expand by the end of 2015.

**Exhibit 1.2**  
**OTS Paratransit Staff (FY 2015)**

	<b>September 2015</b>	<b>Pending Positions</b>	<b>Total Anticipated</b>
Handi-Van Drivers	298.0	9.0	307.0
Reservations	28.0	5.0	33.0
Dispatch	13.5	0.0	13.5
Scheduling	6.0	1.0	7.0
Operations Clerks	8.0	0.0	8.0
Customer Service	2.5	0.0	2.5
<b>Total Operations Staff</b>	<b>356.0</b>	<b>15.0</b>	<b>371.0</b>

Source: Oahu Transit Services

**Ridership:** In FY 2015, OTS carried 1,044,872 Handi-Van passengers on 1,068,634 paratransit trips. OTS operated 181 Handi-Vans by the end of FY 2015 and serviced 480,993 calls. Exhibit 1.3 shows OTS operating performance for the period FY 2013 to FY 2015.

**Exhibit 1.3**  
**OTS Paratransit Operating Performance (FY 2013 to FY 2015)**

	<b>Total Eligible Paratransit Passengers Carried</b>	<b>Total Personal Care Attendants (PCA) Carried</b>	<b>Total Passengers Carried<sup>1</sup></b>	<b>Total Scheduled Trips</b>	<b>Total Calls</b>	<b>Total Revenue Hours</b>	<b>Passengers/Revenue Hour<sup>2</sup></b>	<b>Number of Vehicles<sup>3</sup></b>
FY 2013	888,865	142,725	1,031,590	1,114,307	393,658	367,098	2.42	157
FY 2014	923,867	151,765	1,075,632	1,124,467	500,634	374,307	2.47	169
FY 2015	897,417	147,455	1,044,872	1,068,634	480,993	379,516	2.36	181

<sup>1</sup> Total Passengers Carried includes Personal Care Assistants (PCAs)

<sup>2</sup> Passengers/Revenue Hour excludes PCAs

<sup>3</sup> Number of vehicles as of the end of the fiscal year

Source: Oahu Transit Services

### ***Paratransit pick-up times, fares, terms and process***

Honolulu has two primary types of riders: subscription and demand riders.

- **Subscription rider:** customer has an established trip pattern and has a standing reservation. This customer does not have to call OTS to schedule these frequently traveled trips.
- **Demand rider:** customer calls OTS to schedule a one-way/roundtrip paratransit ride between one to two days prior to the desired trip date. Trips provided to agency day programs are often subscription trips.

Honolulu charges a flat rate of \$2<sup>2</sup> per trip regardless of the rider, distance, or services provided.

### ***Paratransit Terms***

- **Subscription Customer** – customer has an established trip pattern and has a standing reservation. This customer does not have to call OTS to schedule such trips.
- **Fare Types** – by city ordinance, a one-way paratransit fare is \$2.00. There are two ways customers can pay for paratransit rides:
  - o *Cash* – the customer can pay the Handi-Van driver or taxi driver cash.
  - o *Coupon* – Individuals purchase coupons from OTS at \$2 each and redeem them for paratransit transportation. Agencies (e.g. Goodwill, Lanakila, and Easter Seals) may also purchase coupons and distribute them to their clients for transportation to/from program sites.

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<sup>2</sup> We compared select ADA requirements and operational policies from six jurisdictions around the country: Honolulu, HI; King County, WA; Portland, OR; Denver, CO; Minneapolis, MN; and Sacramento, CA. We found that: One-way paratransit fares ranged from \$1.75 (King County, WA) to \$5.00 (Sacramento, CA); Honolulu charges \$2.00. The window for making an advance paratransit reservation ranged from 2 days to 7 days; Honolulu allows customers to make a reservation up to 2 days prior. Penalties for excessive no-shows ranged from 3 per month or 10% of total trips taken (whichever is greater) to 3 per month or 4% of total trips taken. Honolulu's no-show penalty triggers at 20% of total trips in a two-month period. See Appendix D for a complete city-by-city comparison.



- **Demand Customer** – customer that calls OTS to schedule a one-way/roundtrip paratransit ride at least two-days prior to the desired trip date.
- **Real-Time Scheduling** – assigning a paratransit vehicle to a requested trip while the caller is on the phone utilizing a computerized scheduling software program.
- **No Solution Found** – status given to customers whose paratransit trip request cannot be accommodated by real-time scheduling. The customer is offered a pick-up time from a pre-established matrix of time slots (most are on-the-hour.) Schedulers will attempt to find appropriate rides up to the day prior to the scheduled trip via trip cancellations, assigning taxis, or rearranging trip runs.
- **Unscheduled** – status given to no solution found customers who could not be accommodated by OTS scheduling prior to the trip date. Dispatchers will attempt to accommodate unscheduled customers on the day of their assigned trip.
- **Negotiated Time** – customer and OTS reservations will negotiate pick-up times based on trip availability generated by the scheduling system and within ADA guidelines (+/- one hour from requested pick-up time). Prior to real-time scheduling, customers were generally offered pre-determined, on-the-hour pick-up times.
- **Trapeze** – demand response scheduling and dispatch software used by OTS to manage paratransit operations.
- **Estimated Vehicle Arrival (EVA)** – Web-based program that allows customers to track and obtain status information on their Handi-Van ride. For OTS and DTS management, EVA tracks operating data and generates performance reports. EVA was introduced to paratransit customers in August 2015.
- **Mobile Data Terminal (MDT)** – a computerized device used in public transit vehicles to communicate with a central dispatch function. They are also used to display mapping and transmitting other important operational data and documents.

## **Customer Reservation Flowchart**

Subscription, as well as agency, riders are pre-booked for trips. Demand riders may call in between one to two days before the date of their desired trip<sup>3</sup>.

**Demand Customer Reservation Process:** For demand customers, there are three possible outcomes when calling in to OTS reservations to schedule a Handi-Van ride:

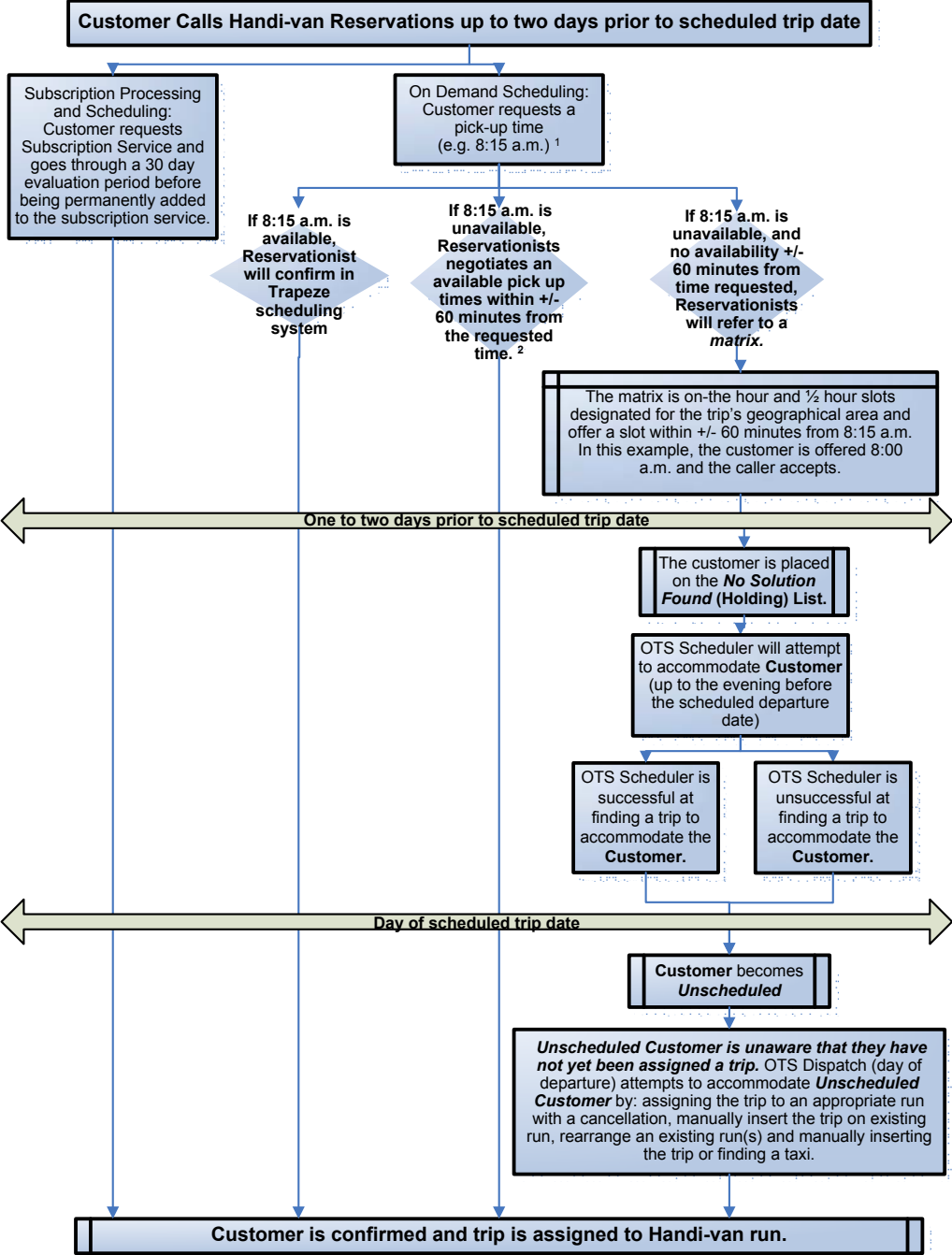
- Customer is confirmed for the exact pick-up time requested;
- If the exact pick-up time is not available, the customer and reservationist will negotiate on an available pick-up time within ADA guidelines (+/- 1 hour from requested time); or
- If there are no available pick-up times available within ADA guidelines, the customer is offered an available time from a matrix, outside of the scheduling system, and a place holder is established until an appropriate ride can be found (No Solution Found status).

The flowchart depicting the demand customer reservation process is shown in Exhibit 1.4.

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<sup>3</sup> As of February 1, 2016, DTS permits riders to schedule a trip between one and three days in advance.

### Exhibit 1.4 Demand Rider Reservation Process



Notes:

- 1. Customers having site restrictions, modified reasonable accommodation due to medical reasons, etc. that require taxi service do not need to negotiate. So, if the customer calls and asks for a 8:15 a.m. pick-up, we will schedule the customer at 8:15 a.m.
- 2. If a customer refuses the negotiated time +/- 60 minutes from the requested time the customer will be marked refused and will be subject to the OTS refusal process see Appendix E.

Source: Office of the City Auditor and Oahu Transit Services

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## **Audit Objectives, Scope and Methodology**

This audit was conducted pursuant to City Council Resolution 14-69, FD1<sup>4</sup>, *Requesting the City Auditor to Perform a Comprehensive Management and Performance Audit of the City's Paratransit Service*.

The audit objectives were to (1) assess and update the status of issues identified in Resolution 14-69, FD1; (2) compare and contrast Honolulu's paratransit service with the American with Disabilities Act of 1990 (ADA) minimum requirements and with other jurisdictions that provide paratransit services; and (3) assess the sustainability of the paratransit program.

The audit team performed a variety of tasks to address the audit objectives. We assessed internal controls related to applicable federal and city laws, rules and guidelines related to paratransit services. We examined OTS and DTS policies, procedures, rules, and guidelines as part of the internal control assessment. The audit team also interviewed administrators and staff at DTS and OTS, and analyzed performance and operating data and statistics for FY 2013 to FY 2015. The team toured OTS' Middle Street facility, including its vehicle maintenance operations, reservations, scheduling, and dispatch. We examined a variety of OTS software technology and report management programs including *Trapeze* and Estimated Van Arrival (EVA) System. We also conducted a *ride-along* on a Handi-Van vehicle to observe operations and review customer handling. Audit staff observed Handi-Van pick-ups and drop-offs at various locations on Oahu to collect applicable operational data. We observed and evaluated participants in the Handi-Van eligibility determination processes. The audit team also attended two Citizens for a Fair ADA Ride (CFADAR) public meetings, and held several private meetings with members of that organization.

To compare and contrast Honolulu's paratransit program with ADA requirements and other jurisdictions, we examined requirements under the Americans with Disabilities Act of 1990 and assessed paratransit services provided by the City and County of Honolulu. We also reviewed comparable paratransit services provided by King County, WA; Portland, OR; Denver, CO; Minneapolis, MN; and; Sacramento, CA.

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<sup>4</sup> We found that three operational areas requested for review by Resolution 14-69, FD1, were generally sufficient and are not included in the body of this report. Our assessment on eligibility determinations, handling of customer complaints, and procurement can be found in Appendix F.

For assessing the sustainability of the paratransit program, we reviewed past consultant reports, federal reviews, and audit reports. We also assessed DTS and OTS paratransit plans, including operating and capital expenditures to support the paratransit operation. The audit team also examined cost savings or service demand initiatives implemented over the last three years. We interviewed applicable OTS and DTS staff, as well as a private consultant in the paratransit field.

This review covered the three-year period FY 2013 to FY 2015. In some instances we referenced performance activity that occurred outside this time period for comparison or clarification purposes.

This audit was performed in accordance with generally accepted government auditing standards from April 2015 to January 2016. Those standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Audit Results

Despite OTS and DTS initiatives to improve paratransit services, improvements are still needed. DTS increased its fleet size, improved the availability of Handi-Van vehicles, implemented 14 of 18 recommendations listed in the Short Range Transit Operations Plan of May 2012; and increased the use of supplemental taxis. Despite implementing these initiatives, OTS operations remain inadequate to support current customer demand, and system performance improvements are limited. The operational deficiencies exist because OTS has not made full use of scheduling and dispatching technologies; OTS is providing services not required by ADA; and controls over subscription volumes are inadequate. As a result, Handi-Van on-time performance has declined 5% over the past three years; customers experienced *excessive* trip times; requests for demand services are difficult to meet; and paratransit operations do not fully comply with ADA requirements.

Paratransit revenues are insufficient to sustain the program services. The last fare increase was 2001. Paratransit fares have remained the same for 14 years and cost recovery is less than 5%. Program costs total about \$40 million per year and revenues total about \$1.7 million per year. Paratransit revenues can be increased by increasing subscription and demand user fares and charging agencies the full costs or higher fares for the service.

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# Chapter 2

## Despite Many Improvements, Handi-Van Deficiencies Still Exist

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Oahu Transit Services (OTS) implemented several initiatives to improve paratransit operations. It increased its fleet size, improved the availability of Handi-Van vehicles, and are making better use of taxis to supplement the paratransit service. Despite implementing these initiatives, OTS Handi-Van on-time performance declined 5% over the past three years; customers experienced excessive trip times; and requests for demand services are difficult to meet due to capacity constraints. The Department of Transportation Services (DTS) did not fully implement four recommendations from the 2012 Short Range Transit Operations Plan, which could have improved operations. The city's paratransit service also did not comply with key Americans with Disabilities Act (ADA) service requirements.

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### Background

The Federal Transit Administration (FTA) Circular (FTA C 4710.1, November 4, 2015) provides guidance on ADA requirements. The guidance states a transit agency shall schedule and provide paratransit service to any ADA eligible person at any time requested in response to a service request. While the transit agency may negotiate pick-up times, it may not schedule a trip to begin more than 1 hour before or after the individual's desired departure time.

The ADA requirements apply to the city and most other providers of paratransit service. Like many other public transit agencies, Honolulu uses contractors to operate and provide the paratransit, as well as fixed route bus, services.

On behalf of the city, OTS manages the city's bus and paratransit systems and provides the employees who operate and manage the systems. The city reimburses OTS for the operating expenses. Under the city contract, OTS is paid a management fee to operate both services. Revenues collected by OTS are deposited in an account controlled by the city.

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### OTS Initiatives

**OTS Increased Its Fleet Size and Improved Fleet Availability:** Since FY 2013, OTS increased its Handi-Van fleet 15.3% from 157 vehicles to the current 181 vehicles. OTS also recorded an

85.3% vehicle availability ratio in FY 2015, which surpassed its performance benchmark of 83.3%. Despite these achievements, managers report OTS capacity is insufficient to support the demand increases and to properly schedule customers when they call to make reservations. As a result, the number of late passenger pick-ups, unscheduled trips, and trips with excessive trip times remain high.

**Handi-Van fleet increased 15.3% over three years:** As of July 1, 2013, OTS had 157 Handi-Van vehicles in its fleet. On July 1, 2015 the number of vehicles increased to 181, a 15.3% increase over two years. DTS purchased 99 new vehicles in 2014, which were introduced into the fleet between 2014 and 2015. The new vehicles replaced older models that were phased out of the fleet and increased the fleet a net of 24 vehicles.

Exhibit 2.1 depicts the Handi-Van fleet composition over the last three years<sup>1</sup>. Maximum wheelchair capacity increased from 727 in July 2013, to 869 in July 2015 (19.5% increase over two years). Maximum non-wheelchair capacity increased from 1,834 in July 2013 to 1,894 in July 2015 (3.3% increase over two years).

The numbers below the Vehicle Type (in bold) represent the maximum number of wheelchair passengers (First Number) followed by the maximum number of non wheelchair passengers (Second Number). For example, 6/0 means the maximum capacity of that vehicle is 6 wheelchair passengers and 0 non-wheelchair passengers. 0/10 means that if the vehicle has 0 wheelchair passengers, it can accommodate 10 non-wheelchair passengers. In other words, vehicle capacity will vary by trip, depending on the number of wheelchair passengers scheduled.

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<sup>1</sup> Fleet Characteristics. In July 2013, the average age of the Handi-Van vehicles was 6.1 years. The average age of Handi-Van vehicles declined to 3.2 years in July 2015 (47.5% decrease over two years). In July 2013 44% of the Handi-Van fleet was 7 years or older; in July 2015, only 23% of the fleet was 7 years or older.



## Exhibit 2.1 Handi-Van Fleet Composition (July 2013 to July 2015)

	# of Vehicles	Avg. Age (Years)	Maximum Capacity		Vehicle Type											Total
			Wheelchair	Non-Wheelchair	1200 (6/0 0/18)	1200 (2/0 0/6)	X400 (6/0 0/18)	X400 (2/0 0/6)	1400 (5/0 0/10)	2600 (5/0 0/10)	2700 (5/0 0/12)	2800 (5/0 0/12)	2800 (1/0 4/0)	2902 (5/0 0/14)	3100 (5/0 0/12)	
7/1/2013	157	6.1	727	1834	24	4	8	2	0	32	20	10	18	1	38	157
7/1/2014	158	6.5	727	1804	21	4	6	2	11	27	20	10	18	1	38	158
7/1/2015	181	3.2	869	1894	0	0	0	0	99	5	19	10	9	1	38	181
% change in 2 years	15.3%	-47.5%	19.5%	3.3%	-100%	-100%	-100%	-100%	--	-84.4%	-5.0%	0%	-50.0%	0%	0%	15.3%

Source: Oahu Transit Services

**Availability of Handi-Van vehicles has improved:** In FY 2013 and FY 2014, OTS fell short of its performance benchmark (83.3%) for vehicle availability although OTS reported average vehicle availability rates of 80.1% and 77.4%, respectively. In FY 2015, the availability rate improved. For FY 2015, OTS surpassed its performance benchmark (83.3%) and 85.3% of its Handi-Van fleet was available to service customers. Exhibit 2.2 shows the performance results for FY 2013 to FY 2015.

## Exhibit 2.2 Vehicle Availability Performance (FY 2013 to FY 2015)

	Average # of vehicles available	Avg. # of vehicles unavailable	Total Average Vehicles	% of vehicles AVAILABLE (Target 83.3%)	% of vehicles UNAVAILABLE (Target 16.7%)
FY 2013	127	31	158	80.1%	19.9%
FY 2014	123	36	159	77.4%	22.6%
FY 2015	148	25	173	85.3%	14.7%

Source: Oahu Transit Services

According to an OTS maintenance administrator, currently there are about 20-25 Handi-Van vehicles unavailable for service on an average day due to scheduled and unscheduled maintenance. Prior to DTS' purchase of 99 vehicles in 2014, the number of vehicles out of service each day was as high as 45. According to OTS, newer vehicles have fewer breakdowns and experience more time between scheduled maintenance. As a result, more vehicles are available each day to service customers.

**New vehicles added to fleet:** The purchase and delivery of 99 new paratransit vehicles contributed to the improved availability and allowed OTS to shed older, less-reliable vehicles from its fleet. Although more Handi-Van vehicles were available to service customers and operational reliability improved, OTS continued to experience late passenger pick-ups and capacity constraints. OTS managers stated unscheduled trips (trips that cannot be scheduled when customers call in) remain high and adversely impacts the operations.

**OTS increased use of taxi services:** ADA requires that OTS provide a trip within one hour before or after a customer’s requested pick-up time. If the Handi-Van operation does not have sufficient capacity to meet customer demand, taxis are used to accommodate the overflow and ensure ADA compliance. That is, OTS supplements the Handi-Van service with taxi service.

The taxis are on-call and used as needed to provide trips that the Handi-Van fleet cannot accommodate; to fill-in; to make runs for late trips; and to provide service to locations that are not accessible by the larger Handi-Van. Between FY 2013 and FY 2015, OTS carried a total of 459,869 customers by taxis at a cumulative cost of \$9.9 million. The average cost per taxi ride was \$21.53 for the period FY 2013 to FY 2015.

Comparatively, the average cost for a Handi-Van trip was \$40.01 during the same time period, or 46% more than the cost of a taxi trip. Exhibit 2.3 shows the taxi data and average costs for FY 2013 through FY 2015.

**Exhibit 2.3  
Supplemental Taxi Use - FY 2013 to FY 2015**

	<i><b>FY 2013</b></i>	<i><b>FY 2014</b></i>	<i><b>FY 2015</b></i>	<i><b>Total</b></i>
<b>Total Passengers</b>	158,749	144,627	156,493	459,869
<b>Total Expenditures</b>	\$3,388,390	\$3,155,187	\$3,374,704	\$9,918,280
<b>Avg. Cost per Passenger (Taxi)</b>	\$21.31	\$21.79	\$21.50	\$21.53
<b>Avg. Cost per Passenger (Handi-Van)</b>	\$40.59	\$38.79	\$40.65	\$40.01
<b>Taxi Cost as a % of Handi-Van Passenger Cost</b>	47%	44%	47%	46%

Source: Oahu Transit Services

**Qualified paratransit taxi drivers have increased:** OTS has increased the number of qualified taxi drivers to transport paratransit customers and could realize cost savings. Although taxis are an integral part of the paratransit operation, there are limitations.

In FY 2013 and FY 2014, OTS used two taxi vendors (TheCab and ProCare). In FY 2014, OTS certified 132 taxi drivers between those two companies. In an effort to expand its taxi pool, OTS entered into an agreement with EcoCab in FY 2015. In FY 2013, there were 133 taxi drivers qualified to transport paratransit customers; the number of qualified drivers increased to 174 in FY 2015 (an increase of 31%). Exhibit 2.4 illustrates the growth in the number of qualified taxi drivers over the last three years.

**Exhibit 2.4**  
**Number of Qualified Taxi Drivers (FY 2013 to FY 2015)**

	FY 2013	FY 2014	FY 2015
<b>TheCab</b>	125	123	123
<b>ProCare</b>	8	9	7
<b>EcoCab</b>	---	---	44
<b>Total</b>	133	132	174

Source: Oahu Transit Services

**Potential savings by using taxis:** In the 2007 *Compliance Action Plan for the Handi-Van*, consultants explained the per-unit cost of the Handi-Van can be reduced by expanding the use of taxis and other non-dedicated service providers. By shifting shorter trips during the peak hours from the Handi-Van to other providers, the report estimated that weekday operating costs would be reduced by as much as \$557,800.

The report also noted that if 5% of Handi-Van trips were diverted to a taxi subsidy program with a cost per trip less than the Handi-Van's average cost per trip, the total net savings would be about \$80,000.

Other taxi use benefits include not having to hire more drivers, and not purchasing more Handi-Van vehicles. To provide more taxi service, OTS is discussing formal contract services with other taxi vendors. Through the contracts, taxi vendors would receive

a fixed fee and would be required to commit resources to OTS for paratransit trips.

In our opinion, although taxis are not consistent with the paratransit philosophy of providing a transportation alternative that parallel's the city's fixed-route system, OTS should continue to expand its taxi-based resources and supplement its operations with taxi service to lower operating costs.

**Taxi limitations:** While taxis are important to paratransit operations, there are limitations. For instance, generally, taxis can only accommodate ambulatory, or non-wheel chair, passengers. Taxi drivers can decline paratransit trips, and taxi vendors are not obligated to accept a paratransit trip from OTS. If a taxi driver has a potentially more lucrative trip to schedule, the driver may decline the paratransit ride. Furthermore, paratransit riders are not obligated to pay taxi drivers a gratuity, making the run potentially less lucrative for the taxi driver. Finally, taxi drivers must be trained and certified by OTS to carry paratransit customers. Not all taxi drivers opt to be OTS-certified.



***This private taxi is waiting to transport a paratransit rider on behalf of the Handi-Van. In FY 2015, 156,493 Handi-Van customers were transported via taxi at a cost of nearly \$3.4 million.***

Source: Office of the City Auditor

## Despite Improvements, Paratransit Deficiencies Still Exist

The Federal Transit Administration Circular (FTA C 4710.1, November 4, 2015) states the city may establish a reasonable window around the negotiated pickup time during which the vehicle may arrive and be regarded as *on-time*. The FTA considers pick-up windows longer than 30 minutes in total to be unacceptable because riders have to wait an unreasonable long time for service.

The ADA guidance further states the transit agency has an implicit obligation to get riders to appointments on time (not late). If trip reservation procedures and subsequent poor service cause riders to arrive late at appointments and riders are discouraged from using the service, this would constitute a capacity constraint.

The length of a paratransit trip (including travel time, trip duration, on-board time, or in-vehicle time) is an important measure of service and is considered *excessive* if the time required exceeds a similar trip via a fixed route system like the bus.

### ***Declining on-time performance and high number of excessive trip times occur despite the improvements***

According to the ADA, untimely service is a prohibited practice. Substantial numbers of significantly untimely pick-ups or return trips are considered a *capacity constraint* and not permitted. We found that the city's paratransit service had consistently poor *on-time* performance. That is, OTS was providing unreliable service to paratransit customers and violating ADA requirements.

OTS managers stated that despite implementing the initiatives to improve service, including the increase in the overall fleet capacity, lower fleet age, and assigning more trips to taxis, the paratransit system continued to have operational problems caused by a lack of capacity. More specifically:

- OTS' performance standard of 90% on-time paratransit trips was not met. In FY 2013, on-time performance was 86.3%. In FY 2014, on-time performance was 83.1%. In FY 2015, on-time performance was 81.3%. Overall, Handi-Van on-time performance declined 5%.
- Customers experienced excessive trip times; late customer pick-ups continued, and requests for demand services were difficult to meet.

As a result, OTS reliance on taxi service will continue to increase because hundreds of trips per day cannot be scheduled due to lack of capacity. Taxis were used to supplement OTS operations

because OTS did not have enough capacity to carry customers with its existing fleet. For example, in FY 2015, taxis carried 156,493 paratransit customers, an 8.2% increase from the 144,627 taxi customers transported in FY 2014.

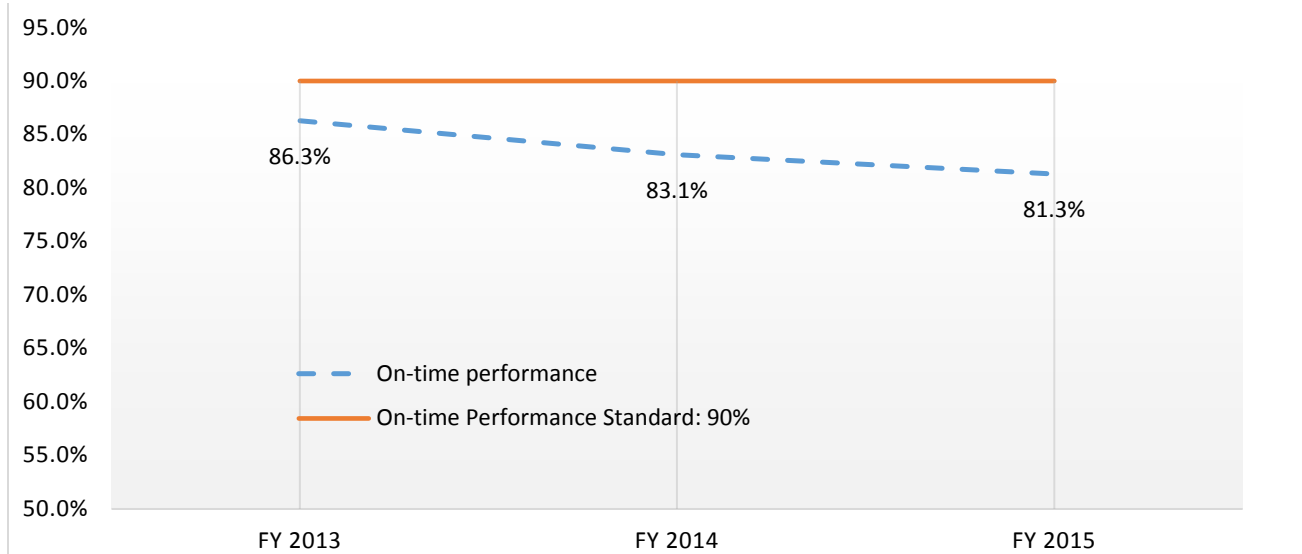
In our opinion, the operational deficiencies existed for several reasons. More specifically, OTS had not made full use of scheduling and dispatching technologies; OTS was trying to provide services not required by ADA; and controls over subscription volumes were inadequate. Specifically, OTS had not made full use of its computerized *Trapeze* scheduling system; had not fully implemented real-time scheduling; and problems with the Mobile Data Terminals (MDT) compromised important communication and data collection on board Handi-Vans.

***On-Time performance has declined 5% despite improved fleet availability.*** OTS defines a Handi-Van trip as *on-time* if the customer was picked up within a 40 minute window of -10/+30 (up to 10 minutes early or 30 minutes after the negotiated pick-up time).<sup>2</sup> As discussed earlier, OTS increased the number of Handi-Vans by 15.3%, improved the availability of vehicles, and made increasing use of taxis to supplement operations. Nevertheless, Handi-Van *on-time* performance declined 5% between FY 2013 and FY 2015 and failed to meet its performance standard of 90% *on-time* during the same time period. Exhibit 2.5 shows the Handi-Van decline in *on-time* performance and comparison against its performance goal of 90%.

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<sup>2</sup> This definition differs from the ADA pick-up window guideline that states customers should be picked-up within a 30-minute window around the negotiated pick-up time (e.g. -10/+20 minutes, 0/+30 minutes, etc.) The FTA allows paratransit operators some latitude in defining *on-time* trips, including pick-up times that occur earlier than the 30-minute pick-up window.

### Exhibit 2.5 Handi-Van On-time Performance (FY 2013 – FY 2015)



Source: Oahu Transit Services

OTS attributes much of the decline in on-time performance to the number of older vehicles that existed through half of FY 2015. We attribute the declining on-time performance to insufficient capacity, inefficient use of the *Trapeze* technology, excessive *no solution found* results, and unscheduled trips that adversely impacted the paratransit system.<sup>3</sup>

**OTS recorded 23,811 trips with excessive trip times in a nine-month period despite improved fleet availability.** In addition to late customer pick-ups, another customer service indicator is *excessive* trip time. An excessive trip is defined as exceeding the acceptable trip time standard of *bus route +30 minutes*. Since paratransit is meant to complement the city's fixed-route system (TheBus), calculating a reasonable paratransit trip consists of two parts: the comparable amount of time a paratransit trip would take using TheBus; and 30 minutes added to take into account

<sup>3</sup> Starting in July 2015, OTS implemented protection runs to resolve the late pick-ups. Under this initiative, OTS dispatched Handi-Vans to *float* in a particular area of the island to pick up customers whose scheduled vans were running late. The OTS dispatcher used the *floaters* vans to pick up the slack and keep scheduled runs operating on-time. Protection runs were often positioned in Waipahu and Wai`anae. Since this initiative was relatively new, OTS could not determine its impact on the Handi-Van on-time performance.

travel time to/from the bus stop from a person's home, transfer time, and travel time to/from a bus stop to the rider's final destination.<sup>4</sup>

According to ADA requirements, a pattern or practice of a substantial number of trips with *excessive* trip lengths is also a form of *capacity constraint*. We found that OTS recorded 23,811 trips with excessively long trip times in a 9-month period in FY 2015, which we deemed significant. That is, the city's paratransit services was unreliable and violated ADA requirements for capacity constraint limits.

To illustrate *excessive* trip time, on October 16, 2015, a customer recorded a van time of 2 hours and 33 minutes for a trip travelling from Waipahu to Kapolei, a total of 8.7 miles. OTS estimated that the *Bus +30* calculation for this trip was 1 hour and 14 minutes. This customer was on the Handi-Van for 1 hour 19 minutes longer than a comparable fixed route trip and the trip was considered *excessive*.

In another example of *excessive* trip time, on that same day, a customer was on the Handi-Van for 2 hours and 8 minutes for a trip travelling from Aiea to Helemano, a total of 15.6 miles. This customer was on the van for 46 minutes longer than the 1 hour and 22 minutes it should have taken (*Bus +30*). *Excessive* trips like these happen many times per month.

OTS began formally tracking *excessive* trip times in February 2015. For the 9-month period of February – October 2015, OTS identified 23,811 excessive trip times experienced by its customers. These trips represented 4.2% of all paratransit trips offered during the same time period. Exhibit 2.6 shows the number of *excessive* trips recorded during 2015.

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<sup>4</sup> Riders may incorrectly perceive they are taking an excessive trip if, for example, they can travel by car from their house to the drugstore three miles away in 10 minutes. However, if this same trip to the drug store was made on TheBus, it may take much longer, perhaps up to 20 minutes, if the user includes the stops along the way. Adding the 30 minute travel time to/from the bus stop, the comparable paratransit trip could take as much as 50 minutes and would be considered reasonable.



**Exhibit 2.6**  
**Excessive Trips – February to October (2015)**

2015	Total Trips	# of Excessive Trips	Percent of Excessive Trips
Feb	41,004	2,307	5.6%
Mar	58,742	3,710	6.3%
Apr	64,638	3,639	5.6%
May	64,398	2,819	4.4%
Jun	66,216	1,894	2.9%
Jul	67,918	1,999	2.9%
Aug	65,597	2,360	3.6%
Sep	65,719	2,539	3.9%
Oct	67,541	2,544	3.8%
Total		23,811	4.2%

Source: Oahu Transit Services

Although the city developed a *Short Range Transit Operating Plan* (SRTOP) that contained a recommendation for monitoring vehicle times, OTS did not begin formally monitoring and tracking vehicle times until February 2015. The above results indicated OTS needed to establish performance goals or benchmarks (e.g. no more than 2% of total trips should be *excessive*) for *excessive* trips and action plans for mitigating *excessive* trip times.

**Deficiencies  
 Existed For Several  
 Reasons**

In May 2012, the city developed a *Short Range Transit Operations Plan* (SRTOP) (see Appendix A) for the TheBus and Handi-Van services. The plan provided a set of policies, principles and recommendations to improve the efficiency, effectiveness, capacity, and quality of Honolulu’s existing bus and paratransit services. The SRTOP identified and recommended near term service improvements that addressed important issues for improving operational efficiency. It also created guidelines for future planning and to identify and prioritize capital improvements and service changes. The plan was based on the findings of the *Short Range Transit Plan Existing Conditions Report*, August 2010.

***Four recommendations from the 2012 Short Range Transit Operations Plan have not been implemented***

DTS and OTS staff implemented only 14 of the 18 recommendations in the SRTOP. Of the four outstanding recommendations, one recommendation was not implemented and three recommendations were partially implemented. In our opinion, these recommendations, if implemented, could address some of the problems reported by OTS. (See Appendix A for the 18 recommendations.)

The one recommendation that was not implemented was:

- **Manage the Handi-Van Fleet.** DTS and OTS do not have a comprehensive fleet management plan; do not have a formula or long-range plan for fleet replacement or growth; do not estimate future demand; and allow budgetary constraints to dictate when to purchase new vehicles (see page 59).

The three recommendations partially implemented were:

- **Establish Customer Service Satisfaction/Service Quality Program.** OTS tracks and reports to DTS the number of complaints, type of complaints, and commendations. The agency also established a performance benchmark ratio of 2.15 complaints per 1,000 riders. Although the agency tracks the number and types of complaints, OTS does not periodically survey its customers to obtain feedback on paratransit operations, policies, or procedures. OTS and DTS has increased its outreach by meeting more regularly with advocacy groups, including Citizens for a Fair ADA Ride (CFADAR). While CFADAR is a noteworthy resource, it does not represent the broader customer base. OTS should develop appropriate surveys or convene focus groups to obtain direct customer feedback. This will allow OTS to be more proactive in addressing concerns rather than reacting to customer complaints.
- **Establish Demand Management Program.** OTS established real-time scheduling for its Handi-Van operation in October 2014. Real-time scheduling allows a paratransit agency to schedule more accurate pick-up times, and offers better service to customers. Through real-time scheduling, computer software plans the trip routes and estimates the pick-up times using computerized algorithms and related processes. We found that OTS continues to override computer generated schedules and schedules a significant portion of its customers manually. In addition, schedulers have reverted to using a paper-

based matrix system to manage customers who cannot be accommodated through the Trapeze scheduling system.

- **Excessive Length of Time on Vehicle Compared to Fixed Route.** Prior to 2014, OTS reported a monthly Excessive Trip Time Rate in its Monthly Performance Report to DTS. The rate was based on a formula of fixed route +20 minutes. In November 2014, OTS stopped reporting the excessive trip time rate and amended its definition to fixed route +30 minutes. Although OTS continues to collect excessive trip time data which is accessible to DTS, the agency does not formally report data on this performance indicator in its monthly report to DTS. Furthermore, OTS has not established a standard or benchmark to determine whether the number of trips with excessive trip times are acceptable or problematic.

***Paratransit operations did not comply with ADA minimum service requirements***

The ADA requirements establish eight service criteria requirements for paratransit operations. (See Appendix B). Honolulu did not comply with two of the eight criteria. The two were *trip purpose restrictions and trip denials/capacity constraints/service availability*. The city's paratransit operations were unable to meet the two criteria because of the volume of OTS agency subscriptions and its operational practices.

**OTS does not comply with trip purpose restrictions.** ADA §37.131(d), *Trip purpose restrictions*, states that OTS shall not impose restrictions or priorities based on trip purpose. In other words, OTS cannot prioritize medical trips (i.e. doctor appointments, dialysis treatment, etc.) over a shopping trip to buy groceries. According to ADA, all trips are considered equal for complementary paratransit service.

We found that OTS placed a priority on agency-related trips (see Chapter 4). In practice, OTS scheduled non-profit agency trips before demand trips. According to an OTS administrator, schedulers ensured that customers travelling to a non-profit agency such as Easter Seals, Goodwill, and Lanakila were given a high priority for rides and pick-ups. Many of these agency trips were on subscriptions. The trip prioritizations resulted in unintended restrictions for demand riders and violated ADA requirements for equal paratransit service.

**OTS does not comply with trip denials/capacity constraints/service availability requirements.** ADA §37.131(f), *Capacity Constraints*, states that, in applicable part, an entity shall not limit the availability of paratransit service to ADA paratransit eligible

individuals. We found that OTS' mishandling of subscription volumes exceeded ADA guidelines and was the primary cause for this violation. (See Chapter 4). As a result, the city was at risk for civil lawsuits, reduction in federal funds, and federal intervention.

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# Chapter 3

## The City's Paratransit Service Model is Unsustainable

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Paratransit fares have remained the same for 14 years and cost recovery is less than 5%. For FY 2013 and FY 2014, paratransit costs totaled about \$40 million and revenues collected totaled about \$1.7 million. Paratransit revenues were insufficient to sustain the program services and could be increased. The city currently charges all Handi-Van customers \$2 per one-way trip<sup>1</sup>. The Americans with Disabilities Act (ADA) allows the city to charge up to \$5 per one-way trip, and more for non-required services such as agency trips, out of service area trips, and other premium services. In addition, Oahu Transit Services' (OTS) current facilities are near capacity, and continuously adding more Handi-Van vehicles and hiring more staff will require significant capital costs.

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### Background

According to ADA regulations (49 CFR, Subtitle A, Section 37.131), paratransit customers can be charged up to twice the amount of a one way-trip on the fixed route system (TheBus). The current one-way bus fare in Honolulu is \$2.50; thus, paratransit riders can be charged up to \$5 per one-way trip.

**Agency and subscription services.** The ADA rules also allow the city to charge higher fares for social service agencies or other organizations for agency trips (i.e. subscription trips guaranteed to the organization). However, subscription services may not absorb more than 50% of the number of trips available at a given time of the day (unless there is non-subscription capacity). The ADA rules also allow OTS to establish waiting lists, capacity constraints, trip purpose restrictions, and priorities for only subscription services.

**Premium Services.** The ADA rules also allow OTS to charge higher fares for premium services that exceed the minimum ADA requirements. The premium service includes trips beyond the defined  $\frac{3}{4}$  mile service area, trips before or after established service hours, and trips requested on the same day of service. Under these rules, OTS may also limit premium services to certain types of trips. For example, OTS could limit premium

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<sup>1</sup> Paratransit fares are established in Revised Ordinances of Honolulu, Section 13-4.5

service, out-of-area service trips, to those associated with medical appointments.

Based on the ADA regulations, there is no limit that the city can charge for agency-purchased coupons or other non-required premium services.

## Current OTS Paratransit Services Are Not Sustainable

In our opinion, the Handi-Van's operations are not sustainable. Fare revenues for FY 2015 totaled approximately \$1.7 million. In FY 2013 and FY2014, paratransit services cost the city about \$40 million each year. The \$1.7 million in fare box and other revenues covered less than 5% of the program costs. The operating losses averaged about \$38 million per year. The paratransit program operating revenues, expenses, deficits, and recovery rates are shown in the exhibit below.

**Exhibit 3.1  
Recovery Ratios (FY 2013 to FY 2015)**

	<i>FY 2013</i>	<i>FY 2014</i>	<i>FY 2015</i>
Total Operating Expenses	\$ 40,106,037	\$ 39,465,520	\$ 34,283,289
Total Fare Revenues	\$ 1,682,894	\$ 1,764,168	\$ 1,686,828
Operating Deficit	\$ (38,423,143)	\$ (37,701,352)	\$ (32,596,461)
Handi-Van Fare Per Rider	\$2.00	\$2.00	\$2.00
Passenger Trips	841,447	882,084	843,414
Cost Recovery Ratio*	4.20%	4.50%	4.90%

\*Cost Recovery Ratio: Total Fare Revenues ÷ Total Operating Expenses

Source: Oahu Transit Services

## Paratransit Revenues Could Rise With an Across-the-Board Fare Increase

We compared paratransit fares with Honolulu and five other paratransit jurisdictions from around the country (King County, WA; Portland, OR; Denver, CO; Minneapolis, MN; and Sacramento, CA. (See Appendix D for the city comparisons.) We found that Honolulu's paratransit fare was on the lower end. Trip fares ranged from \$1.75 to \$5 for a one-way ride (Honolulu charges \$2 per one-way trip). Two jurisdictions (Denver and Minneapolis) had a tiered fare structure based on the trip location or time-of-day.

Currently, the city charges all customers \$2 per one-way trip and paratransit fares have not increased since 2001. That is, agency,

subscription, and demand users pay \$2 per trip. According to the Code of Federal Regulations for ADA rules (49 CFR Subtitle A, Section 37.131), the city is allowed to charge fares for paratransit services that do not exceed twice the fixed bus route system fares, or \$5 per trip.

If paratransit fares were increased to the maximum allowed under the ADA regulations and paratransit riders charged the maximum \$5 per trip, we estimate paratransit revenues could increase from \$1.7 million to \$4.2 million, based on the FY 2015 ridership data. The \$5 per one-way trip rate would also improve the cost recovery ratio from 4.9% to 12.3%.

Exhibit 3.2 shows the impact of raising paratransit fares from \$2 to \$3, \$4, and \$5.

**Exhibit 3.2**  
**Projected Fare Revenues versus Estimated Expenses**  
**FY 2015\***

	<b>\$2 Fare</b>	<b>\$3 Fare</b>	<b>\$4 Fare</b>	<b>\$5 Fare</b>
<b>Operating Expense</b>	\$34,283,289	\$34,283,289	\$34,283,289	\$34,283,289
<b>Revenue (estimated)</b>	\$1,686,828	\$2,530,242	\$3,373,656	\$4,217,070
<b>Revised Operating Expenses (estimated)</b>	-\$32,596,461	-\$31,753,047	-\$30,909,633	-\$30,066,219
<b>Cost Recovery Ratio</b>	4.9%	7.4%	9.8%	12.3%

\*Based on 843,414 estimated passenger trips provided in FY 2015.

Source: Oahu Transit Services

## Agencies Should Be Charged Full Costs or Higher Fares

Agency users are Handi-Van customers who are traveling to social service agencies. OTS allows individual riders and organizations to purchase ride coupons for agency riders in advance. These agency coupons are purchased at the same rate of \$2 per one way trip. The bulk of the coupons are purchased by social service agencies, nonprofits, and other organizations. Most of these agency customers are on subscriptions and are a priority for OTS.

Other paratransit operators charge higher fares for agency and other premium services. The City of Madison, Wisconsin, for example, charges riders a one-way paratransit fare of \$3.25 and prohibits service agencies from purchasing paratransit booklets at the \$3.25 regular rate. Instead, agencies are charged \$33.75 for a

one-way trip. Similarly, the City of Green Bay, Wisconsin charges riders a one-way paratransit fare of \$3.00, and charges services agencies \$15.00 per one-way trip.

ADA rules do not require paratransit agencies to sell coupons or offer subscription services and specifically allow paratransit operators to charge higher fares<sup>2</sup>. In our view, agency customers receive a premium service and could be charged a higher fare.

**Top five service agencies using paratransit services.** We identified the top five agencies that used paratransit services. These agencies purchased 153,173 coupons for \$6.2 million. The recovery rate for these agencies covered 4.9% of the cost of the city's paratransit service. Exhibit 3.3 below compares the city costs and the revenues generated in FY 2015.

**Exhibit 3.3**  
**Agency Coupons and Cost Recovery Ratio for FY 2015**

<i>Agency Name</i>	<i>Number of Coupons</i>	<i>Total Cost for Rides</i>	<i>Revenue (\$2 Coupon)</i>	<i>Cost Recovery Ratio</i>
Easter Seals Hawaii	26,698	\$1,085,273.70	\$53,396.00	4.92%
Goodwill Industries of Hawaii, Inc.	25,910	\$1,053,241.50	\$51,820.00	4.92%
Lanakila Pacific	43,292	\$1,759,819.80	\$86,584.00	4.92%
Special Education Center of Hawaii, Inc. (SECOH)	24,200	\$983,730.00	\$48,400.00	4.92%
Logisticare	33,073	\$1,344,417.45	\$66,146.00	4.92%
<b>Total</b>	<b>153,173</b>	<b>\$6,226,482.45</b>	<b>\$306,346.00</b>	<b>4.92%</b>

Source: Oahu Transit Services

The average one-way cost to provide a paratransit trip in FY 2015 was \$40.65. ADA regulations do not place limits on the amount the city can charge for agency-purchased coupons. The city can therefore increase the per-ride rate for agency coupons to cover a larger portion of the paratransit service costs and charges fares that are comparable to the premium service agencies receive. The potential impact of increasing the agency rates is illustrated in Exhibit 3.4.

<sup>2</sup> ADA §37.131 (c)(4) states, the paratransit operator... may charge a fare higher than otherwise permitted by this paragraph to a social service agency or other organization for agency trips (i.e. trips guaranteed to the organization.)



**Exhibit 3.4****Potential Agency Coupon Sales and Revenue Projections for Select Agencies (FY 2015)**

<b>Agency Name</b>	<b>Number of Coupons</b>	<b>Operating Expense</b>	<b>Actual and Proposed Revenues</b>			
		<b>Total Cost Per Trip</b>	<b>\$2 Coupon Price (Current)</b>	<b>\$10 Coupon Price</b>	<b>\$25 Coupon Price</b>	<b>\$40.65 Coupon Price*</b>
Easter Seals Hawaii	26,698	\$1,085,273.70	\$53,396.00	\$266,980.00	\$667,450.00	\$1,085,273.70
Goodwill Industries of Hawaii, Inc.	25,910	\$1,053,241.50	\$51,820.00	\$259,100.00	\$647,750.00	\$1,053,241.50
Lanakila Pacific	43,292	\$1,759,819.80	\$86,584.00	\$432,920.00	\$1,082,300.00	\$1,759,819.80
Special Education Center of Hawaii, Inc. (SECOH)	24,200	\$983,730.00	\$48,400.00	\$242,000.00	\$605,000.00	\$983,730.00
Logisticare	33,073	\$1,344,417.45	\$66,146.00	\$330,730.00	\$826,825.00	\$1,344,417.45
<b>Total</b>	<b>153,173</b>	<b>\$6,226,482.45</b>	<b>\$306,346.00</b>	<b>\$1,531,730.00</b>	<b>\$3,829,325.00</b>	<b>\$6,226,482.45</b>

\*Coupon price equivalent to actual cost

Source: Oahu Transit Services

In 2015, actual revenues from the select agencies coupon sales totaled \$306,346. Projected revenues if agency coupon prices were equivalent to the actual cost per trip (\$40.65) totaled approximately \$6.2 million, an increase of more than \$5.9 million in potential revenues.

### **Unchecked Demand for Services Will Impact OTS Growth and Will Require Nearly \$143 Million in Expansion Costs**

OTS currently maintains 181 paratransit, Handi-Van vehicles at its Middle Street facility, with some vehicles parked at its Pearl City bus yard. The current fleet is close to the estimated capacity of 195 vehicles that can be serviced and maintained within OTS' current resources. Future growth would require significant capital expenditures.

The Department of Transportation Services (DTS) commissioned a study from Architects Hawaii and Gannett Flemming titled, *Public Transit Facility Master Plan*, issued in July 2009. The study was funded in part through grants from the Federal Highway Administration, Federal Transit Administration, and U.S. Department of Transportation. The report assessed capacity needs for both fixed route (TheBus) and paratransit (Handi-Van). The study included several findings related to fleet capacity, physical growth limitations, and facilities.

- The 2009 report stated that capacity is estimated at 160 vehicles, including the eight OTS maintenance bays. Maintenance capacity was calculated by using an industry standard of 20 paratransit vehicles per bay with a two-shift operation providing preventative maintenance, repair, and inspection service. With the addition of a third shift, the maximum capacity was between 185-195 vehicles.
- The study projected that the Handi-Van facility at Kalihi-Palama will reach capacity and not have any expansion capability. The study team estimated a 50% growth in capacity from 185 to 195 vehicles to around 300 vehicles, or over 100 vehicles. The study recommended a second facility with a 140 vehicles capacity based on its growth projections.
- The 2009 study recommended that the second Handi-Van facility be located in West Oahu. The location would result in reduced mileage operating costs for vehicles that primarily serve the West Oahu area; would significantly reduce travel to the existing facility; and provide a more efficient system with quicker responses to West Oahu's service requests.

If DTS decides to increase the fleet, parking and maintaining the vehicles would be a challenge. In the past, DTS and OTS solved increased demand requirements by hiring more drivers and buying more vans. The existing facilities lack the capacity to handle many more vehicles. The cost of a West Oahu facility for both TheBus and Handi-Van fleet would cost \$144 million and take at least five years to construct.



***The Handi-Van base and maintenance yard on Middle Street has an estimated capacity to handle between 185-195 paratransit vehicles. The facility is nearing capacity with the current fleet of 181 Handi-Vans, with no room to expand.***

Source: Office of the City Auditor

To resolve the capacity problem, best practices recommend that operating agencies have at least a five-year plan to properly plan and forecast demand and the resources needed to satisfy the demand. As demand for service increases, DTS and OTS will be challenged to satisfy the additional services needed. Neither OTS nor DTS have a forecast model for predicting future Handi-Van vehicle needs. DTS lacks a comprehensive paratransit plan; and DTS administrators have no formula to calculate the number of vehicles needed to meet paratransit demands. Without the plan, DTS and OTS cannot determine how many vehicles or types of vehicles the city needs to efficiently operate the Handi-Van system.

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# Chapter 4

## Governance and Service Policy Issues Should Be Revisited

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The Department of Transportation Services (DTS) oversight of Oahu Transit Services (OTS) and paratransit operations needs improvement. DTS has not consistently performed annual audits of OTS as required by city ordinance and is not always aware of operational changes or initiatives implemented by OTS. Additionally, the city's governance structure for paratransit lacks accountability. City ordinance mandates that OTS operate both fixed route (TheBus) and paratransit (Handi-Van) in perpetuity, unless the ordinance is amended. The city's paratransit service exceeds minimum ADA requirements because of policy and past practice. We question the city's ability to continue providing premium services when it violates ADA paratransit guidelines.

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### Background

The DTS is responsible for providing public transit (TheBus) and paratransit services (Handi-Van) on the island of O`ahu. DTS plans and directs the city's public transit system, establishes policies for the operation of the fixed routes, reviews established routes, and determines if any adjustments are required.

For Handi-Van services, DTS provides equipment; procures paratransit vans, and reviews and oversees OTS. DTS uses a contractor, Innovative Paradigms, to determine if users are eligible for paratransit services. DTS oversees both OTS and Innovative Paradigms, and responds to recommendations, complaints and questions received from the community and public officials.

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### DTS Oversight of OTS and Paratransit Operations Can Be Improved

Revised Ordinances of Honolulu (ROH) Section 13-8.7 requires DTS to conduct an annual audit of the performance of the city bus system and special transit service to:

- Evaluate the actual performance of the city bus system and special transit service in comparison to budgetary levels of service, and effectiveness and efficiency measures;

- Identify problems in the management, operation, and maintenance of the city bus and special transit services; and
- Recommend solutions to the problems identified.

***The last annual paratransit audit was completed in 2011***

DTS has not conducted this audit since 2011. According to DTS, the most recent audits took approximate 10 to 12 months for the request for proposal and an additional 8 to 12 months to produce the final report. Administrators explained that the management performance review (audit) was funded in FY 2011, but not completed until August 2013. The current performance review contract started in September 2015 and is expected to be completed by June 2016. As a result, DTS is not in compliance with the revised ordinances and is unable to meet the objectives of the audit that include evaluating actual performance, identifying problems, and recommending solutions to the problems identified.

DTS faces logistical challenges in meeting this annual audit requirement. The department may want to propose an ordinance amendment to align the audit need, frequency, or scope with its existing resources.

***DTS notified after managerial decisions made by OTS***

In our opinion, DTS needs to improve oversight and OTS accountability for paratransit operations. Although DTS routinely reviews OTS performance through monthly reports and the OTS weekly Estimated Vehicle Arrival (EVA)<sup>1</sup> website, DTS was unaware of OTS management decisions that were made without DTS consent.

In three separate instances, DTS was notified by OTS after managerial decisions were made.

- In 2010, OTS conducted a test run of real-time scheduling during a weekend. When DTS asked OTS for an update of how the testing was going, OTS responded that they had terminated the program without advising DTS of its decision.

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<sup>1</sup> In August 2015, the EVA system was introduced to paratransit customers. The system allows customers to track and obtain status information on their Handi-Van ride via the internet. For OTS and DTS management, EVA tracks operating data and generates performance reports.

- On a separate instance, OTS leased a van without DTS approval.
- Most recently, OTS contracted with a local vendor to provide supplemental service during non-peak hours without notifying DTS. DTS became aware of the new vendor service only after a customer called to complain about the service.

As a result, DTS cannot ensure OTS is held accountable for its decisions and cannot provide the oversight needed to minimize risks to the program.

### ***City ordinance created OTS***

Revised Ordinances of Honolulu (ROH), Section 13, Article 8, Transit Management Services Contractor, requires that the fixed route and paratransit services must be operated by the same transit management services contractor. The ordinance states that the city has the power to form and contract with a private, nonprofit corporation to serve as the transit management services contractor, and that the entity shall have no purpose, except to manage, operate, and maintain the city bus system and special transit service. The ordinance further allowed the city to enter into a management agreement with the designated entity for a period of at least five years.

The ordinance consolidated the fixed-route (The Bus) and paratransit (Handi-Van) services under a single operator. OTS was created for the sole purpose of providing fixed-route and paratransit services for the city. It does not offer services to other entities, and does not seek additional business from other entities. OTS assumed the operation and management of both TheBus and special transit services (paratransit) on April 1, 1997.

The DTS Management and Operations Agreement with OTS expired on June 30, 2002, and an amendment was executed on July 22, 2010. The amended management agreement extended the agreement indefinitely until such time as the city and OTS execute a new agreement.

### ***Studies indicate benefits of separating fixed route and paratransit services***

In other jurisdictions, fixed route operations are operated separately from paratransit operations. While there are benefits of consolidating fixed-route and paratransit services, there are also benefits if both services are separated. Since 2007, studies conducted by consultants on TheBus and Handi-Van have identified fixed route and paratransit operations issues such as the lack of incentives for OTS to improve paratransit operations.

For instance, fixed route and paratransit services are two different operations. Fixed route operations provide services to the general population, while paratransit operations provide special services to a specific segment of the public. The studies indicate the city may want to separate the fixed-route and paratransit operations.

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### **OTS Provides Services That Exceed or Violate ADA Minimums**

OTS provides services that exceed Americans with Disabilities Act (ADA) minimum requirements. These include offering service outside the  $\frac{3}{4}$ -mile radius minimum; not enforcing conditional eligibility; and offering subscription and premium services (See Appendix C) not required by ADA minimum service rules. While DTS is not prohibited from offering these services, the paratransit system presently cannot meet minimum service requirements such as sufficient on-time performance, reduced number of trips with excessive trip times, and capacity constraints. DTS should consider changing long-standing policies to ensure OTS can adequately meet ADA service requirements before offering these services. Long-standing DTS policy in these areas allow these excessive services, but should simultaneously reduce overall demand for paratransit services.

### ***OTS does not enforce $\frac{3}{4}$ -mile radius limit which adds additional cost***

The ADA service criteria requires OTS to provide service within  $\frac{3}{4}$  of a mile on each side of a fixed route. The Handi-Van service currently exceeds the minimally-required service area. Services provided outside of the three-fourths of a mile on each side of a fixed route is a premium service and could be charged a higher fare.

The OTS paratransit program provides services that exceed the  $\frac{3}{4}$ -mile radius required by ADA. The agency accommodates all passengers regardless if the passenger's pick-up or drop-off is located in the required service area. Although the city has the option of not providing paratransit service outside the service area or charging a premium for Handi-Van service beyond the  $\frac{3}{4}$ -mile radius, OTS does not charge for the extra service.

OTS provides services to riders whose locations are beyond the  $\frac{3}{4}$  of a mile service area at its standard fare of \$2 per one way trip. For example,

- At the time of booking a trip, the *Trapeze* system has a mapping tool that is capable of notifying reservationists if trips are outside of the required service area. According to OTS, this tool is turned off and is not utilized. As a result,



the *Trapeze* mapping tool is not used to enforce the  $\frac{3}{4}$ -mile radius rule.

- OTS has opted to incur the additional costs of providing service outside the  $\frac{3}{4}$ -mile radius and to forgo the additional revenue that could be generated from providing the services outside of the required area. More specifically, OTS charges the standard rate of \$2 per one way trip, although the city could charge a higher fare for service outside the  $\frac{3}{4}$ -mile radius.

We reviewed ridership patterns from a sample of five customers whose pickup and/or drop-off locations were beyond the required service area and determined that OTS had forgone \$4,105 in revenues. The total cost of providing the trips was approximately \$32,462.

Exhibit 4.1 below quantifies our breakdown of the five riders sampled. For the 821 trips OTS provided, up to \$4,105 of potential fare revenues went uncollected.

#### Exhibit 4.1

##### Sample of Riders with Trips Outside of Service Area (FY 2014 to FY 2015)

	Street	Zip Code	Distance From Fixed Route	Trips Provided Outside Service Area	Cost of Trips Provided	Current Fare Revenue (\$2)	Potential Fare Revenue (\$3)	Potential Fare Revenue (\$4)	Potential Fare Revenue (\$5)
<b>Rider A</b>	Kuliouou Rd	96821	1.2 miles	401	\$15,772	\$802	\$1,203	\$1,604	\$2,005
<b>Rider B</b>	Kuliouou Rd	96821	1.0 miles	274	\$10,842	\$548	\$822	\$1,096	\$1,370
<b>Rider C</b>	Pupukea Rd	96712	2.8 miles	78	\$3,171	\$156	\$234	\$312	\$390
<b>Rider D</b>	Punono St	96789	1.4 miles	42	\$1,668	\$84	\$126	\$168	\$210
<b>Rider E</b>	Kuliouou Rd	96821	1.2 miles	26	\$1,009	\$52	\$78	\$104	\$130
<b>Total</b>				<b>821</b>	<b>\$32,462</b>	<b>\$1,642</b>	<b>\$2,463</b>	<b>\$3,284</b>	<b>\$4,105</b>

Source: Oahu Transit Services and Google Maps

Paratransit operators in other jurisdictions charge a premium for out-of-area service. The Santa Clara Valley Transportation Authority in San Jose, California charges a one-way base fare of \$4 for ADA required trips. The operator charges \$16 per one-way fare for premium services, including extended service area trips. Similarly, the Massachusetts Bay Transportation Authority charges a standard \$3 one-way paratransit fare, but charges \$5 each way for service outside the  $\frac{3}{4}$ -mile service area.

DTS should consider policy changes to have OTS adhere to the minimally-required ¾-mile service area. This change could reduce cost, align paratransit operations with the fixed-route service area as intended by ADA, and improve on-time performance. If the practice of providing service beyond the ¾-mile service area continues, fare increases are justified for this premium service.

***OTS does not enforce conditional eligibility requirements which adds unnecessary cost***

According to ADA regulations, a rider is conditionally eligible if an individual meets the eligibility criteria for some trips but not others. ADA rules state the individual shall be ADA paratransit eligible only for those trips for which he or she meets the criteria. Conditional eligibility applies to individuals who are able to independently use fixed route transit services under some circumstances. OTS does not enforce conditional eligibility limitations. As a result, some riders are provided paratransit trips for which they are not eligible. This adds to operations cost and reduces the capacity for rides for eligible customers.

The Handi-Van's Eligibility Center is managed by a contractor, Innovative Paradigms. The company is paid about \$1 million per year for its services. At the center, applicants are deemed eligible, conditionally eligible, temporary eligible, or ineligible to ride The Handi-Van.

- ***Eligible*** – Customer may ride the Handi-Van for all transportation needs, without restriction
- ***Conditionally eligible*** – Customer may ride the Handi-Van under certain conditions only
- ***Temporary eligible*** – Customer may ride the Handi-Van with or without conditions for a specific time period
- ***Ineligible*** – Customer may not ride the Handi-Van

From FY 2013 to FY 2015, 1,368 applicants were deemed conditionally eligible. The approximate cost of assessing conditionally eligible riders was \$347,472. The Eligibility Center also conducted optional Travel Training for conditionally eligible riders. From FY 2013 to FY 2015, 30 riders were travel trained. The approximate cost of travel training the riders was approximately \$63,750.

We reviewed five paratransit services from other jurisdictions for best practices of enforcing conditional eligibility. Four of the five jurisdictions we reviewed enforced conditional eligibility.

Although the Innovative Paradigms eligibility process deemed some applicants as conditionally eligible and were provided conditional eligibility and travel training services, OTS did not distinguish between conditionally eligible riders and unconditionally eligible riders when providing paratransit services. That is, conditionally eligible riders were treated as unconditionally eligible riders.

From a list of 1,368<sup>2</sup> conditionally eligible riders between FY 2013 to FY 2015, we selected a sample of seven riders who had conditions that were specific, measurable, and could be enforced with minimal effort and cost. Exhibit 4.2 describes the number of ineligible trips for each rider and the cost of providing the trips.

**Exhibit 4.2**  
**Sample of Ineligible Trips Provided to Conditionally Eligible Riders**

	<i>Condition Description</i>	<i>No. of Ineligible Trips (FY 2013-FY 2015)</i>	<i>Estimated Cost of Providing Ineligible Trip*</i>
<b>Rider A</b>	You may use TheHandi-Van for trips to unfamiliar destinations	191	\$7,764
<b>Rider B</b>	You may use TheHandi-Van for trips to unfamiliar destinations	145	\$5,894
<b>Rider C</b>	You may use TheHandi-Van for trips to unfamiliar destinations	31	\$1,260
<b>Rider D</b>	This trip is during hours of darkness (dusk to dawn) You may not use thehandi-van for trips to XXXX	7	\$285
<b>Rider E</b>	This trip is during hours of darkness (dusk to dawn)	82	\$3,333
<b>Rider F</b>	This trip is during hours of darkness (dusk to dawn)	251	\$10,203
<b>Rider G</b>	This trip is during hours of darkness (dusk to dawn)	109	\$4,431
<b>TOTAL</b>		<b>816</b>	<b>\$33,170</b>

\*Based on FY 2015 costs

Source: Innovative Paradigms and Oahu Transit Services

From our sample, we calculated that OTS provided 816 ineligible trips at a cost of \$33,170. As a result of not enforcing the conditional eligibility rules, OTS incurred unnecessary costs and requests for service that could have been made available to others.

<sup>2</sup> Only 2% of the conditional riders opted to participate in travel training.

According to DTS administrators, enforcing conditional eligibility may not be worth the time and expense. DTS states there is a relatively small number of realistically enforceable conditions and enforcement would target only a handful of individuals. Our review of seven conditionally eligible customers over a three-year period was not an analysis of all conditionally-eligible customer trips. A complete analysis of all conditionally-eligible trips may reveal a more substantial impact on paratransit operations.

If the conditional eligibility enforcement is extraneous, DTS may need to re-evaluate its eligibility process. The city currently pays Innovative Paradigms \$1 million a year to conduct comprehensive, in-person eligibility determinations. Although considered an industry best practice, in-person determinations are not required by ADA or FTA. If OTS is not going to enforce conditional eligibility, DTS should consider saving taxpayer dollars by streamlining the eligibility determination process and reducing the contract amount.

DTS should consider a policy change to ensure that OTS enforces the ADA conditional eligibility rules. This could save the city money and free-up capacity for eligible riders. Higher fares for this premium service are also warranted.

### ***Subscription service levels violate ADA service requirements***

According to ADA requirements, subscription service may not absorb more than 50% of the number of trips available at a given time of day. We found that OTS routinely violates ADA requirements by exceeding 50% capacity for subscription services during peak hours.

***OTS exceeds ADA capacity restrictions for subscription riders.*** More specifically, OTS has five peak hours in a day. Three peak hours in the morning (hourly from 5:00 a.m. to 8:00 a.m.) and two peak hours in the afternoon (2:00 p.m. and 3:00 p.m.). Honolulu's paratransit operations routinely exceed the subscription 50% capacity guidelines during peak-hours of operation. For example, we sampled 9 operating days between FY 2013 and FY 2015 and identified subscription capacity during peak operating hours. We found:

- In FY 2013, subscription capacity exceeded 50% in 9 of 15 peak hours
- In FY 2014, subscription capacity exceeded 50% in 7 of 15 peak hours
- In FY 2015, subscription capacity exceeded 50% in 13 of 15 peak hours

**Exhibit 4.3**  
**Sample of Subscription Capacity Violations**  
**FY 2013 to FY 2015**

	FY 13 Sample of Subscription Levels That Exceed 50%		
	6/3/2013	6/12/2013	6/21/2013
Interval Period From:	Percentage Subscriptions	Percentage Subscriptions	Percentage Subscriptions
05:00-05:59	55%	45%	68%
06:00-06:59	62%	65%	50%
07:00-07:59	60%	49%	62%
14:00-14:59	60%	58%	12%
15:00-15:59	50%	46%	54%

	FY 14 Sample of Subscription Levels That Exceed 50%		
	6/2/2014	6/11/2014	6/20/2014
Interval Period From:	Percentage Subscriptions	Percentage Subscriptions	Percentage Subscriptions
05:00-05:59	44%	45%	52%
06:00-06:59	52%	57%	45%
07:00-07:59	52%	54%	37%
14:00-14:59	54%	54%	38%
15:00-15:59	43%	41%	43%

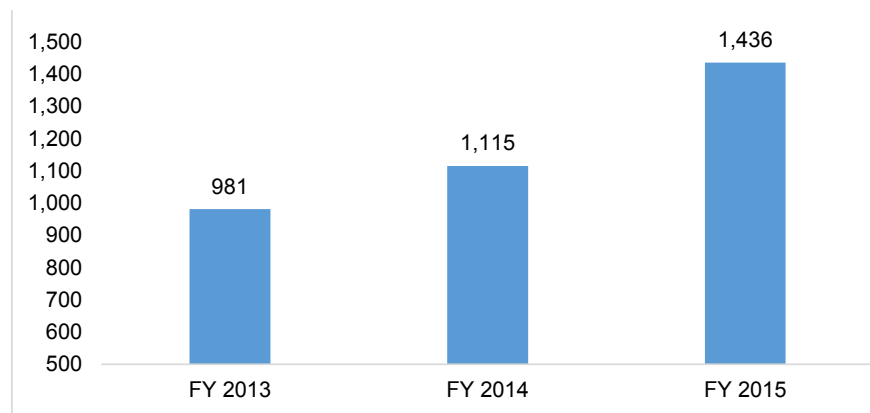
	FY 15 Sample of Subscription Levels That Exceed 50%		
	6/1/2015	6/10/2015	6/19/2015
Interval Period From:	Percentage Subscriptions	Percentage Subscriptions	Percentage Subscriptions
05:00-05:59	66%	59%	50%
06:00-06:59	60%	59%	52%
07:00-07:59	68%	62%	58%
14:00-14:59	67%	63%	61%
15:00-15:59	49%	53%	53%

Note: Data in tables show the percentage of subscriptions from total trips taken during the hour.

Source: Oahu Transit Services

**Subscription riders are increasing.** Subscription ridership has increased from FY 2013 to FY 2015. In FY 2015, OTS recorded 1,436 subscription riders, a 46% increase from 981 subscription riders in FY 2013. Exhibit 4.4 shows the steady increase in the total number of subscription riders over the last three years. As subscription ridership increases, we anticipate the opportunities to meet demand ridership will decrease.

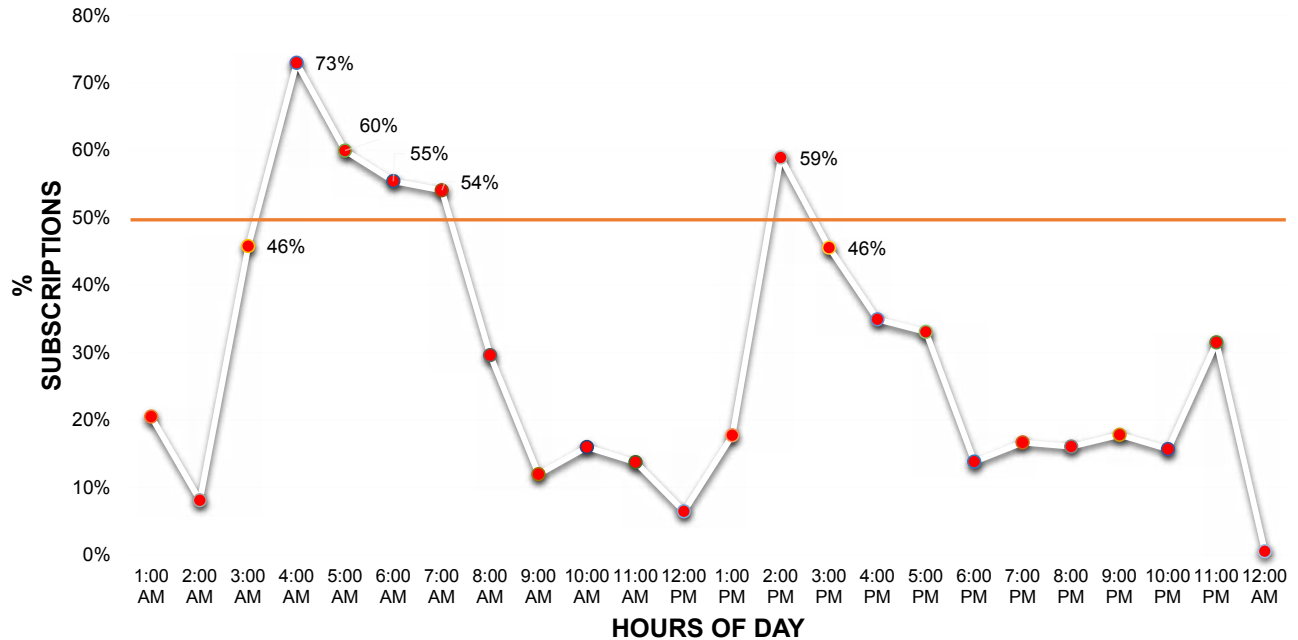
**Exhibit 4.4**  
**Number of Subscription Riders (FY 2013 to FY 2015)**



Source: Oahu Transit Services

**Hourly violations for subscription ridership.** Exhibit 4.5 shows the average subscription levels throughout the operating day in FY 2015. We found that ADA capacity violations occurred in five peak hours when subscription levels exceeded 50%.

### Exhibit 4.5 FY 2015 Hourly Subscription Percentages



Source: Oahu Transit Services

Honolulu's subscription service violates ADA regulations and limits the paratransit service available to non-subscription customers that call in for a trip reservation. More specifically, the OTS practice of giving priority to subscription riders, scheduling subscription trips first, and assuring subscription riders of their pick-up times reduces the capacity in the *Trapeze* scheduling system and reduces the chances for accommodating non-subscription customer requests for pick-up at the requested time. As a result, non-subscription riders may not get their preferred trip times, are offered less convenient trip times, and may be placed on a *no solution found* or *unscheduled* list. The violations of ADA requirements related to subscription rider capacity and capacity constraints put the city at risk for civil lawsuits, a reduction in federal funds, or federal oversight.

#### **Controls over subscription service volumes are inadequate**

ADA regulations prohibit subscription services from absorbing more than 50% of the number of available trips at any given time of day. ADA regulations also state that the paratransit service shall not have any operational pattern or practice that significantly limits the availability of service.

OTS does not adequately manage subscription services. The agency does not have any formal policies or practices in place for Handi-Van related waitlists, trip purpose restrictions or any form of trip prioritization that can be used to help manage the large subscription base. We believe OTS needs to improve internal controls over subscriptions so demand services can be filled.

***Formal policy for subscription service does not exist.*** OTS does not have a formal policy, application process, or procedure for subscription service. To obtain subscription status, an eligible paratransit customer can verbally request to be placed on a subscription for routine trips (e.g. travel from home to work Monday through Friday; trips to an adult day care center Mondays, Wednesday, and Fridays; or dialysis treatment every Tuesday and Thursday, etc.) In practice, OTS would examine the customer's trip history to determine if the customer established a pattern of ridership within a 30-day period. If a pattern is established, OTS places the customer on the subscription list.

***Cap on subscription riders does not exist.*** We found that OTS does not place a cap on the number of subscription riders, even when subscription capacity reaches 50%. There are no internal controls in place to prevent subscriptions from exceeding 50% capacity in any given hour of operation. The *Trapeze* scheduling system has the capability to manage subscription levels and can report violations and warnings if subscription capacity exceeds the 50% threshold. However, OTS does not use this feature to manage subscriptions. Rather, subscriptions are maintained manually, outside of the *Trapeze* scheduling system.

For scheduling subscriptions, OTS is operating a hybrid system of real-time scheduling and manual scheduling. It consists of half on-the-hour subscription services that absorbs overall seat capacity during peak hours and on-the-hour pre-booked subscription rides that occupies the overall seat capacity.

***Subscription riders receive better pick-up service.*** Subscription trips are manually placed on runs before other trip requests and form the base level of service around which other trips are scheduled. Conversely, non-subscription riders are not guaranteed their requested pick-up times and are subject to trip availability and negotiation. Pick-up times for non-subscription riders are generated by the scheduling system.

When subscriptions are not well managed, subscription service can contribute to service problems including trip denials and capacity constraints for non-subscription ride requests. Exhibit



4.6 compares two van runs during peak hours that included both, subscription clients and non-subscription clients.

**Exhibit 4.6**  
**Subscription Riders vs. Non-Subscription Riders Sample**  
**(Trend Analysis)**

<b>Van Run: 17620</b>					
<b>Date</b>	<b>Client Type</b>	<b>Requested Time</b>	<b>Scheduled Time</b>	<b>Actual Arrival Time</b>	<b>Within Pick-up Window*</b>
6/19/2015	A (SUB)	2:00 PM	2:00 PM	2:14 PM	Yes
6/19/2015	B (SUB)	2:00 PM	2:00 PM	2:14 PM	Yes
6/19/2015	C (SUB)	2:00 PM	2:00 PM	2:14 PM	Yes
6/19/2015	D (SUB)	2:00 PM	2:00 PM	2:14 PM	Yes
6/19/2015	E (NSUB)	2:32 PM	2:32 PM	3:52 PM	No
6/19/2015	F (NSUB)	2:30 PM	2:44 PM	3:47 PM	No
6/19/2015	G (NSUB)	3:30 PM	3:30 PM	4:04 PM	No

<b>Van Run: 11400</b>					
<b>Date</b>	<b>Client Type</b>	<b>Requested Time</b>	<b>Scheduled Time</b>	<b>Actual Arrival Time</b>	<b>Within Pick-up Window*</b>
6/19/2015	A (SUB)	8:00 AM	8:00 AM	7:59 AM	Yes
6/19/2015	B (SUB)	8:00 AM	8:00 AM	8:28 PM	Yes
6/19/2015	C (SUB)	8:00 AM	8:00 AM	8:15 PM	Yes
9/24/2015	D (NSUB)	8:00 AM	8:54 AM	9:30 AM	No
9/24/2015	E (NSUB)	7:30 PM	8:01 AM	9:36 AM	No

\*Pick-up window is the 0-30 minute time period during which the Handi-Van should arrive

(SUB) – Subscription

(NSUB) – Non-subscription

Source: Oahu Transit Services

*Sample Run 17620 shows riders received inequitable service.* Our data confirmed that subscription riders were generally scheduled at the top of the hour, were not subjected to real time scheduling or negotiated times, and were picked up close to the scheduled pick-up times. In our sample, subscription clients A thru D requested top of the hour pick-up times; were scheduled for their requested time; and picked up *within the pick-up window*.

Conversely, non-subscription clients requesting pick-up times were subjected to negotiated pick-up times, competed for pick-up times not taken by the subscription riders, and were more likely to be picked up late. Service to non-subscription riders resulted

in pick-up times that ran late and were outside of the 30-minute pick-up window allowed by ADA.

The data shows that non-subscription riders were inequitably treated and subscription riders received better service. Exhibit 4.7 shows a two day sample of subscription clients who requested pick-up times and the actual scheduled times as provided by OTS.

**Exhibit 4.7  
Subscription Trips Scheduled at Top of the Hour**

<b>Van Run: 11800</b>				
<b>Date</b>	<b>Subscription Client</b>	<b>City</b>	<b>Requested</b>	<b>Scheduled</b>
6/3/2015	A	Pearl City	7:00 AM	7:00 AM
6/3/2015	B	Pearl City	7:00 AM	7:00 AM
6/3/2015	C	Waipahu	7:00 AM	7:00 AM
6/3/2015	D	Waipahu	2:00 PM	2:00 PM
6/3/2015	E	Waipahu	2:00 PM	2:00 PM
6/3/2015	F	Ewa Beach	3:00 PM	3:00 PM
6/3/2015	G	Ewa Beach	3:00 PM	3:00 PM
6/3/2015	H	Ewa Beach	3:00 PM	3:00 PM
6/3/2015	I	Ewa Beach	3:00 PM	3:00 PM
<b>Van Run: 22200</b>				
<b>Date</b>	<b>Subscription Client</b>	<b>City</b>	<b>Requested</b>	<b>Scheduled</b>
8/25/2016	A	Kapolei	2:00 PM	2:00 PM
8/25/2016	B	Kalaeloa	2:00 PM	2:00 PM
8/25/2016	C	Kapolei	2:00 PM	2:00 PM
8/25/2016	D	Kalaeloa	2:00 PM	2:00 PM
8/25/2016	E	Makakilo	2:00 PM	2:00 PM
8/25/2016	F	Makakilo	2:00 PM	2:00 PM

Note: Van Run is the vehicle assigned to various customers

Source: Oahu Transportation Services

In the example in Exhibit 4.7, on 6/03/15, Van Run 11800 was scheduled to pick up three people, at three different locations, and all were scheduled for pick-up at the top of the 7: 00 AM hour. On 8/25/15, Van run 22200 was scheduled to pick up six people, at three different locations all scheduled for pick-up at the top of the 2:00 PM hour. The data sample confirmed that subscription riders were scheduled for pick-up at the top of the hour, and were not subjected to real-time scheduling.

***Agency subscriptions  
receive a higher priority***

A large proportion of the subscription program consists of customers travelling to non-profit or social service agencies. These trips, in particular, receive a higher priority than other trips. According to OTS, all customers booking a ride under a non-profit agency program will be picked up at their requested time. This ensures the riders meet the program hours and time constraints. Comparatively, non-subscription riders are not guaranteed their requested pick-up times and are subject to real time pick-up times generated by the scheduling system. The inequity in service between agency and non-agency riders, and the lack of controls over subscriptions in general, are problematic and need management attention.



***Three Handi-Vans line up to pick-up passengers from Manawa Lea, an adult day health agency in Waipahu. Many agency clients are on Handi-van subscriptions. The city's paratransit service routinely violate ADA requirements that limit subscription capacity to 50% in any given hour of operation.***

Source: Office of the City Auditor

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# Chapter 5

## Operational Improvements in Scheduling, Communication Technology, and Future Planning Should Be Prioritized

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Oahu Transit Services (OTS) is unable to meet operational demands, in part, because it has not made full use of scheduling and dispatching technologies; needs to fully implement real-time scheduling; and needs to solve Mobile Data Terminals (MDT) failures that adversely impact paratransit operations. OTS also needs to establish a formal, comprehensive paratransit plan that establishes future operational goals and plans for achieving the goals over a five-year time period. Absent improvements in these areas, OTS operations will continue to be inadequate to support customer demand.

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### Background

When paratransit users call for a ride, OTS staff will use a real-time scheduling system (*Trapeze*) to arrange a pick-up time. If the system cannot generate a pick-up time, the reservationist will assign an appropriate pick-up time from a matrix and the customer will have the status of *No Solution Found*.

*No Solution Found* is the status given to a customer trip that cannot be scheduled through the *Trapeze* real-time scheduling system. For example, a customer calls OTS to schedule a trip within the two-day window prior to the trip date. The reservationist discovers that there are no available trips to offer the customer. Because ADA guidelines specify that paratransit agencies cannot deny a customer trip, OTS offers a pick-up time based on a matrix of on-the-hour time slots. This customer is confirmed for the date and time of the requested pick-up even though there is no trip run available. This customer is placed on the *No Solution Found* list.

When the OTS scheduler is unable to find a workable solution for the *No Solution Found* customer, an **unscheduled trip** designation is assigned to the customer. The OTS scheduler passes the *unscheduled* trip to OTS dispatchers who will exercise several options. The dispatcher may monitor cancellations, add unscheduled trips, rearrange existing Handi-Van runs, reassign a confirmed customer to another run, or divert drivers on the road to pick-up an unscheduled passenger. Unscheduled trips are problematic because many of those trips are added during the operations and can cause significant trip delays.

*Real-time scheduling.*<sup>1</sup> Real-time scheduling is an industry best practice and was recommended for implementation in the 2010 Short Range Transit Plan conducted by the Department of Transportation Services (DTS). Although DTS entered into a contract with Trapeze Software Group back in 1998 to purchase a paratransit computer reservations, dispatch, and real-time scheduling system with on-board mobile data terminals and global positioning system, the city did not use its real-time scheduling capability.

Prior to introducing real-time scheduling, OTS operated a manual scheduling system based on a matrix of pick-up times. In this system, customer pick-up times were generally scheduled at the top-of-the hour. These top-of-the-hour times were offered to several customers on the same van although it was impossible for the van to be at three locations, for example, at the same time (e.g. 7:00 am). Thus, customers did not expect to be picked up exactly at 7:00 am, but *around* 7:00 a.m.

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## **Scheduling and Dispatching Technologies for Real-Time Scheduling Are Not Fully Used**

OTS needs to fully implement real-time scheduling and make full use of its *Trapeze* scheduling system. Despite introducing real-time scheduling in October 2014, OTS staff continues to manually manipulate Handi-Van schedules. As a result, duplicate scheduling efforts and inefficient operations continue.

*Manual override of real-time scheduling system.* Despite having the capability, OTS did not introduce real-time scheduling until October 2014. Real-time scheduling was implemented to make more efficient use of vans and offer more timely service. Real-time scheduling allowed OTS to schedule and offer customers more accurate pick-up times.

The computer software planned the trip routes and estimated the pick-up times using computerized algorithms and related processes. For example, three customers who asked for a 7:00 a.m. pick-up could be scheduled more accurately for 7:00 a.m., 7:12 a.m., and 7:23 a.m.

However, during certain hours of the day, less than half of the OTS customers were scheduled by the real-time scheduling system due to pre-established subscription customers. OTS subsequently reverted back to manually scheduling and dispatching hundreds of unscheduled trips per day. As a result,

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<sup>1</sup> Real-time scheduling means assigning a vehicle to the requested trip while the caller is on the phone.

real-time trips automatically scheduled by the *Trapeze* software program were routinely dissected and actual trip schedules were manually assembled. The manual rescheduling of trip runs resulted in double work for OTS staff and inefficient operations.

*Reason why real-time scheduling was not used.* OTS staff did not use real-time scheduling to schedule hundreds of customers because the customer demand exceeded the number of available trips available in the scheduling system. For instance, in December 2014, the *Trapeze* real-time scheduling system was unable to schedule 4,134 trips that month. In May 2015, 4,891 trips could not be scheduled by the system. These trips were categorized as *No Solution Found* and accommodated by assigning taxicabs; assigned to existing runs when other customers called to cancel rides; or OTS staff manually rearranged scheduled runs to fit more trips.

OTS position descriptions specifically direct schedulers and dispatchers to manually override computer-generated schedules and to adjust trip runs as needed. The manual override of the computer generated schedules and trips created problems, including late pick-ups, longer user time spent on vans, and poor customer service. More importantly, OTS resources were wasted due to duplicative efforts related to scheduling.

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## No Solution Found And Unscheduled Trips Adversely Impact Operations

If the system cannot generate a pick-up time, the reservationist will assign an appropriate pick-up time from a matrix and the customer will have the status of *No Solution Found*. A customer given a *No Solution Found* status cannot be scheduled through the *Trapeze* real-time scheduling system.

This customer is confirmed for the date and time of the requested pick-up even though there is no trip run available and placed on the *No Solution Found* list. Up until the day prior to the trip date, OTS schedulers will attempt to find a trip for these customers by assigning taxis, cancellations on appropriate runs, or manually rearranging runs to find a solution for these customers.

An **Unscheduled trip** is assigned when the scheduler is unable to find a workable solution for the *No Solution Found* customer and the customer's trip remains unassigned from the evening prior or the day of the trip. OTS dispatchers will manage the trip by monitoring cancellations, adding unscheduled trips, rearranging existing Handi-Van runs (including reassigning a confirmed customer to another run), or diverting drivers on the road to pick-up an unscheduled passenger.

**No Solution Found and Unscheduled Trips.** Exhibit 5.1 shows the number of *no solution found* and *unscheduled* trip customers for FY 2015. In FY 2015, OTS reports indicated that, on an average day, 116 customer trips had no van assigned on the day of their scheduled trip due to lack of capacity. For these *no solution found* trips, OTS dispatchers worked throughout the day to accommodate them through cancellations, re-arranging existing runs, or squeezing trips in wherever possible. Many of the scheduled trips would end up being late or caused other trips to become late.

**Exhibit 5.1  
No Solution Found and Unscheduled Trips (FY 2015)**

	14-Jul	14-Aug	14-Sep	14-Oct	14-Nov	14-Dec	15-Jan	15-Feb	15-Mar	15-Apr	15-May	15-Jun	Avg.
Number of No Solution Found (NSF)	-----	-----	-----	389	3,368	4,134	3,133	3,021	4,539	4,165	4,891	3,892	<b>3,504</b>
Number of Unscheduled Trips	5,745	5,491	5,973	3,982	2,061	2,693	2,468	1,608	2,430	3,410	4,458	2,289	<b>3,551</b>
<b>NO SOLUTION FOUND</b>													
% of NSF	N/A	N/A	N/A	0.4%	4.1%	4.6%	3.6%	3.7%	5.0%	4.6%	5.4%	4.3%	<b>3.9%</b>
Average Number of NSF Per Day	N/A	N/A	N/A	13	112	133	108	108	146	139	158	130	<b>116</b>
<b>UNSCHEDULED</b>													
% Unscheduled	6.2%	6.3%	6.6%	4.3%	2.5%	3.0%	2.8%	2.0%	2.7%	3.7%	4.9%	2.5%	<b>4.0%</b>
Average Number of Unscheduled Per Day	185	177	199	128	69	87	85	57	78	114	144	76	<b>117</b>

Source: Oahu Transit Services

Exhibit 5.2 shows the number of unscheduled trips per month in FY 2014. According to OTS data, in FY 2014, there were an average of 7,478 unscheduled trips per month (8% of all scheduled trips). On an average day, 252 trips were unscheduled the day of travel and OTS dispatchers had to manually accommodate the unscheduled trips.



## Exhibit 5.2

### Monthly Unscheduled Paratransit Trips (FY 2014)

FY 2014	13-Jul	13-Aug	13-Sep	13-Oct	13-Nov	13-Dec	14-Jan	14-Feb	14-Mar	14-Apr	14-May	14-Jun	Annual Avg.
Number of Unscheduled Trips	4,748	6,711	7,103	7,915	8,321	8,360	6,681	8,213	8,647	8,442	8,659	5,935	7,478
# Days of Unscheduled Trips Data Available*	26	31	29	31	30	31	30	26	31	30	31	29	30
% of Unscheduled Trips	4.9%	6.9%	7.7%	8.0%	8.9%	8.6%	7.1%	9.5%	9.4%	9.0%	9.2%	6.6%	8.0%
Average Unscheduled Trips Per Day	183	216	245	255	277	270	223	316	279	281	279	205	253

\* Number of unscheduled trip data are missing for some days

Source: Oahu Transit Services

***Impact of No Solution Found and Unscheduled trips.*** In October 2014, OTS created the category of *no solution found* to identify trips that the *Trapeze* scheduling system could not accommodate at the time the customer called. If the schedulers could not find a solution for these customers (either through taxis, rearranging Handi-Van runs to fit customers in, or cancellations) prior to the scheduled day of the trip, the customer received the designation of *unscheduled*.

OTS estimates that on any given day, there were approximately 500 *no solution found* trips that needed to be accommodated. We reviewed a single-day report for September 17, 2015 and found that there were 509 *no solution found* trips. That is, the *Trapeze* software was unable to assign a pick-up time when the reservation was made. We also found 196 *unscheduled* trips for that date. If the data was typical for an average day, we believe OTS does not have sufficient capacity to meet the demand for paratransit services.

The *No Solution Found* and *Unscheduled* trips caused problems and extra work for the OTS staff. For example, when the rider called for a reservation, OTS would confirm a ride for the customer although a Handi-Van was not available for the actual run. To accommodate the *no solution found* trips, schedulers had to monitor and manually rearrange the Handi-Van runs. If the ride could not be manually scheduled, OTS dispatchers had to resolve the problem by assigning taxis, re-arranging existing driver runs, or monitoring rider cancellations.

***Customer unaware of scheduling problems.*** Customers, unaware that the confirmed ride was not scheduled, were not advised of

their pick-up status. For example, we observed over 27 calls for OTS reservations. Some of those calls were customers wanting to know the status of their late Handi-Van pick-up. In all the cases, we found that reservationists did not disclose to the customer that OTS did not have an assigned van. OTS staff advised the customer that their *van was running late*, apologized, and that they would look into the status. Reservationists would then put the caller on hold, physically get up and walk to another room where dispatchers were located and work with dispatchers to find a ride for the customer. Examples of what we observed follow:

**Example 1.** A customer called OTS reservations to obtain the status of a late-running van. The transcript showed that the customer called into OTS reservations at 12:30 p.m. to obtain the status of her Handi-Van pick-up which was scheduled for 12:00 noon (already 30 minutes late).

- The reservationist pulled up this customer's reservation which showed the trip was still unscheduled and no driver had been assigned to this trip.
- The reservationist apologized to the customer and explained that her van *was running late* and would get an update shortly. The reservationist put the caller on hold, stood up, and went to discuss the matter with the OTS dispatcher located in an adjacent room.
- The reservationist returned a few minutes later and told the caller that OTS is working to find an alternate van for her since her van was *running late*. The caller complained that she had been waiting over 30 minutes.
- At 12:43 p.m. an OTS dispatcher advised a driver in the area to divert and pick-up the customer.
- At 12:52 p.m., the driver arrived to pick up the customer. The pick-up was 52 minutes late. ADA guidelines state that a late pick-up violation occurs when a pick-up is later than 30 minutes.
- The driver dropped off the rider at her destination at 1:03 p.m. The distance between the rider's pick-up point and destination was just under one mile.

In this example, the customer's trip was never assigned a driver until the customer called about her reservation. The customer was never advised that she was *unscheduled* and was not notified that

her pick-up would be late. The wait and travel time for this trip, which was less than one mile, took one hour and three minutes.

**Example 2.** In this example, Customer A called OTS reservations to schedule a trip for the next day. The customer requested a 9:00 a.m. pick-up in Makaha for a trip to a Kapolei destination. No trips were available for the 9:00 a.m. pick-up, so the customer request was designated as *no solution found* and placed on a matrix for 9:00 a.m. At 4:34 a.m. on the day of the trip, the OTS dispatcher assigned the trip to a *phantom* run. At 8:38 a.m. that same morning, dispatch reassigned the trip to a different run. The customer was eventually picked up at 9:29 a.m. (29 minutes after the scheduled time, but within the 30-minute window allowed by FTA) and dropped off in Kapolei at 10:33 a.m.

Although Customer A was not significantly impacted, adding this customer to an existing run caused other customers to be late. More specifically, Customer A was traveling from Makaha to Kapolei.

- The trip prior to this added customer ended in Ewa Beach and the driver's next pick-up destination was in Waianae. By diverting the driver to Makaha, instead of going directly to Waianae for the next pick-up, resulted in back-tracking since Makaha is past Waianae.
- As a result of the added trip, this van had three pick-ups at 9:00 a.m.—two in Waianae (Customers B and C) and one in Makaha. Customer A in Makaha was picked up first, then Customers B and C in Waianae. Customer B, scheduled for a 9:00 a.m. pick-up in Waianae, was picked up at 9:38 a.m. (an ADA violation since the pick-up was more than 30 minutes late). Customer C, also scheduled for a 9:00 a.m. pick-up in Waianae, was picked up at 9:53 a.m. (a second ADA violation since the pick-up was 53 minutes late and exceeded the 30-minute standard). The two 9:00 a.m. pick-ups scheduled in Waianae probably would have been on-time if the driver had not been diverted to Makaha.

According to OTS administrators, an acceptable level of unscheduled trips is about 50 unscheduled trips per day. Generally, 50 unscheduled trips can be accommodated through ride cancellations and manual adjustments to the real-time system *Trapeze* generated runs.

In our opinion, OTS' attempt to accommodate all customers and not deny any ride requests have contributed to the significant number of *no solution found* and *unscheduled* trips. As a result

of trying to accommodate everyone, OTS is contributing to late pick-ups and is compromising the credibility of the paratransit program when dispatchers cite traffic delays and late-running vans as causes for late pick-ups.

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## Mobile Data Terminals (MDT) Failures Impact Paratransit Operations

OTS uses Mobile Data Terminals (MDT) to provide real-time interaction between the Handi-Van vehicle fleet and the dispatch center. These devices cost about \$24,000 each and are supposed to provide real-time updates and messaging to and from the vehicle; provide available route performance data to the driver; and allow drivers to adjust their wait times. The devices are supposed to allow drivers to know exactly when to leave in order to meet customer pick-ups times, and help drivers navigate their routes. The MDT is supposed to facilitate safe and efficient operations; help OTS to manage passenger manifests and pick-ups; communicate with drivers; and help control the flow of accurate and reliable information and communications.

*MDTs failed to work.* According to OTS, the MDTs failed to operate properly on numerous occasions. For the 14-month period from September 2014 to October 2015, the MDTs operated an average 83% of the time. During the same period, an average of 17 MDT units did not operate at all and 62 units worked less than 90% of the time. In total, an average of 79 MDT units per month operated less than 90% of the time or not at all. Exhibit 5.3 below shows the MDT performance.

**Exhibit 5.3****Overall Monthly Performance of Handi-Van Mobile Data Terminals (MDT)  
(September 2014 to October 2015)**

	<i>MDTs Did Not Work for Any Day in Month</i>	<i>MDT's That Did Work for at Least One Day but Less Than 90% Overall</i>	<i>Did Not Work at All During the Month or Performed at Less Than 90% of the Time</i>	<i>Overall Performance (Message Attempts/Message Acknowledgements) Does Not Include Hard Down Units</i>
<b>September 2014</b>	60	44	104	84%
<b>October 2014</b>	40	80	120	82%
<b>November 2014</b>	44	96	140	78%
<b>December 2014</b>	13	120	133	78%
<b>January 2015</b>	7	66	73	80%
<b>February 2015</b>	7	71	78	82%
<b>March 2015</b>	5	45	50	87%
<b>April 2015</b>	5	86	91	77%
<b>May 2015</b>	4	63	67	80%
<b>June 2015</b>	9	61	70	77%
<b>July 2015</b>	10	72	82	82%
<b>August 2015</b>	10	30	40	92%
<b>September 2015</b>	10	21	31	93%
<b>October 2015</b>	11	15	26	95%
<b>Average</b>	<b>17</b>	<b>62</b>	<b>79</b>	<b>83%</b>

Source: Oahu Transportation Services

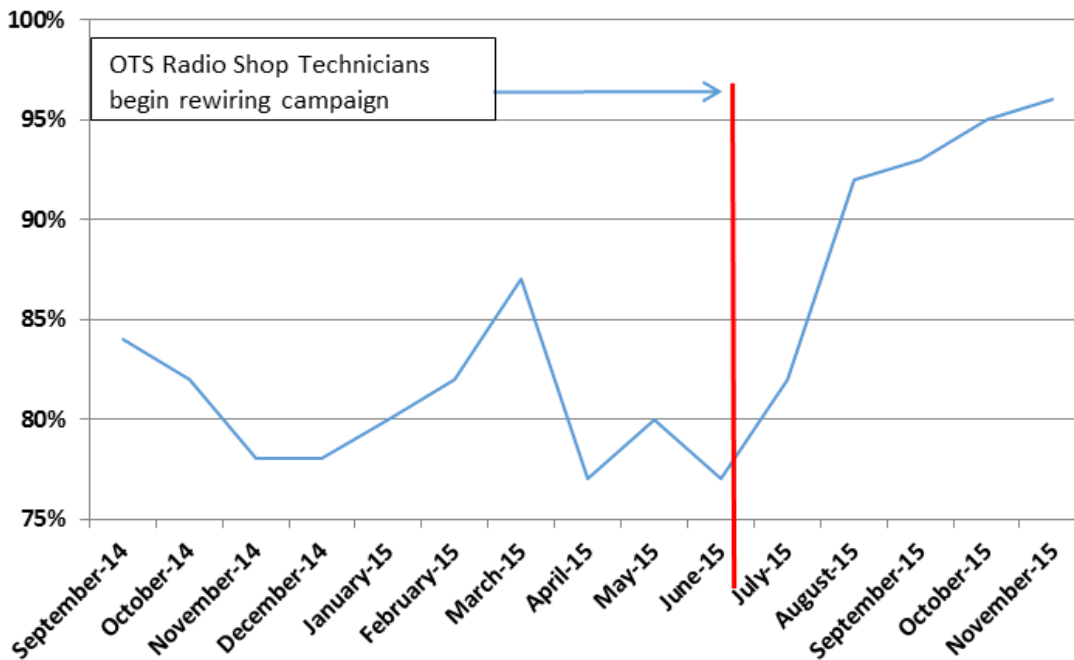
The system has not worked properly and operated below 80% in some months because a defective power source in the Handi-Van wiring caused the devices to malfunction. As a result, drivers and administrative staff relied on paper documents, which reduced the effectiveness of OTS Handi-Van operations.

- For instance, the non-operating MDTs resulted in drivers not getting up-to-date information about changes to the passenger manifests, cancellations, and additions. In one example, we found that a customer had a scheduled pick-up for 1:00 p.m., but did not get picked-up until 4:30 p.m. According to OTS records, the driver indicated that the customer pick-up did not show up on the malfunctioning MDT. As a result, the late pick-up caused the customer to wait 3.5 hours.

- Drivers had to rely on cell phones to communicate with the OTS dispatchers. Besides distracting drivers, drivers had to manually record pick-up and drop-off times and did not receive operational information that the MDT would have automatically provided.
- Drivers submitted manual forms to clerks who then manually input the data into the *Trapeze* system. The duplicate entries and redundancy reduced the effectiveness and efficiency of the paratransit operations.

According to OTS administrators, the agency found a fault with the MDT factory wiring in May 2015. The faulty wiring resulted in lowered power output and caused the devices to malfunction. The wiring issue affected all 99 Handi-Vans purchased in FY 2014. The OTS technicians devised a solution to the problem and the manufacturer agreed to cover the repair costs which cost a few hundred dollars per van. OTS began re-wiring the Handi-Vans starting in June 2015, and all the affected vehicles were re-wired by August 2015. Since 2015, MDT performance has improved to an average of over 90%. Exhibit 5.4 shows the improvement in the MDT performance.

**Exhibit 5.4**  
**MDT Performance Timeline, September 2014 to November 2015**



Source: Oahu Transportation Services

## DTS Lacks a Formal Paratransit Plan

DTS does not have a formal paratransit plan to guide operations. Best practices suggest that paratransit programs have a formal plan with at least a five-year planning horizon. Absent a formal plan, DTS is unable to adequately map out operational needs and benchmark whether the paratransit system is meeting important goals and objectives.

One of the more critical aspects of a paratransit plan is a fleet plan. Currently, DTS does not have a formal fleet plan. DTS relies informally on *demand estimates* and budget availability to plan its fleet needs. Without a formal plan, DTS cannot sufficiently determine how many older vehicles it needs to replace, the number of additional vehicles it needs to meet demand, or the types of vehicles that are needed to meet the needs of its customers.

In follow-up discussions, DTS notes that it has engaged a consultant to prepare a forecast that predicts future paratransit demand. The resulting demand forecast will be used to develop a *Paratransit Growth Management Plan*. The plan's five-year projections will include a fleet management plan that recommends a mix of vehicle types to meet operational needs and the corresponding impact to facilities and equipment, staffing, and the operating and capital budgets.



***A Handi-Van driver assists a customer onto one of 181 Handi-Vans in the paratransit fleet. DTS lacks a formal transit plan, including a fleet plan, to adequately manage the Handi-Van fleet. DTS is in the process of developing a Paratransit Growth Management Plan to determine operational needs over a five-year period.***

Source: Office of the City Auditor

According to DTS, work on this plan commenced in March 2015 and is expected to be completed by June 2016. The new plan will need to address problems related to:

- The number of *no solution found* and *unscheduled* customers which are a significant cause for late pick-up and drop-offs, and trips with extensive trip times.
- OTS operations that continue to be inadequate to support customer demand because OTS does not operationally comply with ADA requirements related to subscription trip volume (ADA limit is 50% of capacity); and
- Improved internal controls over subscriptions that are needed so demand services can be filled.



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# Chapter 6

## Conclusions and Recommendations

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Despite both the Department of Transportation Services (DTS) and Oahu Transit Services (OTS) initiatives to improve paratransit services, further improvements are needed. OTS increased its fleet size, improved the availability of Handi-Van vehicles; implemented 14 of 18 recommendations listed in the *Short Range Transit Operations Plan* of May 2012; and increased the use of supplemental taxis. Despite implementing these initiatives, OTS operations remain inadequate to support current customer demand, and system performance improvements are limited. The operational deficiencies exist because OTS has not made full use of scheduling and dispatching technologies; OTS is trying to provide services not required by Americans with Disabilities Act (ADA); and controls over subscription volumes are inadequate. As a result, Handi-Van on-time performance has declined 5% over the past three years; customers experience excessive trip times; requests for on-demand services are difficult to meet; and ADA violations occur related to capacity constraints and trip purpose restrictions.

More specifically, for operations, OTS needs to address the significant number of no solution found and unscheduled customers, and its impact on the paratransit operations. The agency must improve internal controls over subscriptions so demand services can be filled and ensure ADA compliance related to subscription volume limitations. A comprehensive paratransit plan is also needed to guide DTS operations into the future. In addition, OTS should fully implement real-time scheduling and solve Mobile Data Terminal (MDT) failures that adversely impact paratransit operations. OTS should ensure compliance with ADA minimum service requirements related to capacity constraints and trip purpose restrictions.

From a policy perspective, DTS should evaluate the city's overall service and consider ADA minimum requirements. Enforcement of the ¾-mile operating area and conditional eligibility are possible ways to manage demand and right-size the operation. DTS should also exercise better oversight of the city's paratransit operations by conducting annual audits as required by ordinance and improve monitoring of service providers. The outstanding recommendations from the 2012 *Short Range Transit Operations Plan* (reporting and benchmarking trips with excessive trip times, managing the Handi-Van fleet, establishing a customer service

satisfaction/service quality program, and full implementation of real-time scheduling) should be implemented.

The city's governance structure and sustainability should also be assessed. The city's ordinance structure limits accountability by consolidating fixed-route and paratransit under a single operator. Separating the two distinct operations may improve accountability. Additionally, paratransit revenues are insufficient to sustain program services. Paratransit fare has remained the same for 14 years and cost recovery is less than 5%. Program costs total \$40 million per year and revenues total \$2 million per year (5%). Paratransit revenues can be increased. Fares for premium services not required by ADA could also be increased. Agencies should be charged the full costs or higher fares for the service.

Paratransit is an important component of the city's transportation network. It provides a vital service to our community and many rely on this service to get to work, medical appointments, and other essential daily living activities. Over the past several decades the city has provided a very generous paratransit service, which exceeds minimum ADA requirements. Unfortunately, the city does not have adequate resources to sustain the paratransit system as it currently operates. In order to ensure a safe, reliable, and cost effective paratransit system going forward, operational, policy, and governance changes are needed.

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## Recommendations

We recommend that:

### DTS should ensure that OTS:

1. Complies with ADA §37.131(f), *Capacity Constraints*, by improving subscription management, on-time performance, trips with excessive trip times, and volume of customers travelling to agencies;
2. Complies with ADA §37.131(d), *Trip Purpose Restrictions*, by lowering the volume of agency customers or amending the practice that prioritizes agency trips over other trips;
3. Develops a plan to reduce the number of *no solution found* and *unscheduled* trips;
4. Improves management of subscriptions by establishing formal policies, procedures, application process, and a monitoring program to ensure that subscription levels do not exceed

50% in any operating hour (unless there is excess capacity) as required by ADA;

5. Improves use of the *Trapeze* computer system by putting more of its paratransit operations on real-time and eliminating the reliance on manually amending trip runs;
6. Enforces the ADA minimum  $\frac{3}{4}$ -mile service area for Handi-Van operations;
7. Enforces conditional eligibility restrictions. If enforcement is deemed extraneous, DTS should re-evaluate or streamline the eligibility determination process and reduce the contract amount;
8. Track, report, establish a performance benchmark, and develop an action plan to mitigate trips with excessive trip times;
9. Establish a formal Customer Satisfaction/Service Quality Program to include surveying customers or convening focus groups, as appropriate, to obtain direct customer feedback;
10. Continues to expand its taxi-based resources, as appropriate, so that it has a reliable resource to supplement its Handi-Van operation;
11. Monitors and reports to DTS Mobile Data Terminals (MDT) performance until reliability issues are satisfactorily resolved, and seek reimbursements for correcting the manufacturer defects;

**DTS should:**

12. Establish a comprehensive paratransit plan, inclusive of a fleet management plan, with a five-year time horizon;
13. Reassess the need, scope, or frequency for annual audits of the fixed-route and paratransit system as required by §13-8.7, Revised Ordinances of Honolulu; and, as necessary, request appropriate amendments to the ordinance;
14. Consider establishing a tiered fare structure, through the rule-making process, that charges more for agency trips, out-of-service area trips, and other premium services not required by the ADA;

15. Improve monitoring and oversight of paratransit operations by ensuring that OTS notifies the department prior to the implementation of any significant program or operational change;

**The Honolulu City Council should:**

16. Consider amending Revised Ordinances of Honolulu, Section 13-4.5 to increase complementary paratransit system fares and improve the cost recovery ratio; and
17. Consider amending Revised Ordinances of Honolulu, Section 13, Article 8, Transit Management Services Contractor, to separate fixed-route and paratransit operations from the mandate that the services be provided by a single operator.

---

## **Management Response**

The Managing Director's Office and the Department of Transportation Services generally agreed with the audit recommendations and indicated that the department has implemented, is in the process of implementing, or gathering information to address those recommendations.

Management also offered suggested corrections and clarifications to the audit draft. We generally agreed with those suggestions and amended the report accordingly. In its response, management clarified that not all subscription riders are agency clients and suggested that a distinction be made between agency and non-agency riders, rather than subscription and non-subscription riders. Accordingly, management offered amendments to pages 45 and 49 of the draft report. We understand and acknowledge management's clarifying comments and took the following actions:

Regarding the suggested changes to page 45, the discussion was about subscriptions in general and the impact of non-compliance with ADA guidelines on non-subscription riders. The discussion was not intended to isolate agency trips, which is a subset of the subscription base. We amended the text to distinguish between subscription and non-subscription riders.

Management also offered clarifying amendments for page 49. In this instance we amended the report to distinguish between agency and non-agency riders.

In addition, we made other technical, non-substantive changes to the draft report for purposes of accuracy, clarity, and style.

We thank the Managing Director, the Department of Transportation Services, and O`ahu Transit Services for their assistance during the audit. A copy of management's full response can be found page 68.

OFFICE OF THE MAYOR  
CITY AND COUNTY OF HONOLULU

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KIRK CALDWELL  
MAYOR



ROY K. AMEMIYA, JR.  
MANAGING DIRECTOR  
GEORGETTE T. DEEMER  
DEPUTY MANAGING DIRECTOR

February 25, 2016

Mr. Edwin S.W. Young  
Office of the City Auditor  
City and County of Honolulu  
1001 Kamokila Boulevard, Suite 216  
Kapolei, Hawaii 96807

Dear Mr. Young:

**SUBJECT: Audit of the City's Paratransit System**

We are in receipt of your letter dated February 12, 2016 and appreciate the opportunity to review the final draft audit report in advance of the final report. I understand the Department of Transportation Services (DTS) previously provided written comments to your proposed findings and many of their comments were accepted and incorporated into the final draft. Since then, DTS has identified a few additional suggested corrections and clarifications, the contents of which are attached hereto as Exhibit A.

DTS advises there are no unexpected findings or disagreements with the final draft audit and they look forward to receiving the final report which will help them resolve the remaining significant challenges with the City's paratransit system, especially the long-term fiscal sustainability of the paratransit operation.

For consistency, the following responses in italics are provided with respect to discrete recommendations contained on pages 64-65 of the final draft audit report:

**DTS should ensure that OTS:**

1. Complies with ADA §37.131(f), *Capacity Constraints*, by improving subscription management, on-time performance, trips with excessive trip times, and volume of customers travelling (sic) to agencies;

*Response: Agree. DTS shares the Auditor's concerns and will continue its work with OTS to address this ADA issue. Via letter dated June 26, 2013, DTS provided OTS the following written policy guidance:*

Mr. Edwin S.W. Young  
 February 25, 2016  
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*This letter shall reconfirm the Department of Transportation Services' policy that TheHandi-Van service shall be operated at all times in general compliance with the Federal Transit Administration's ADA paratransit service standards for public transit. In particular, subscription service (rides which are repeated pre-arranged rides that only need to be scheduled once for the same days and times each week, and which travel between the same origins and destinations) shall be operated such that this service shall not absorb more than fifty percent of the number of trips available at a given time of day, unless there is non-subscription capacity.*

*A copy of DTS' June 26, 2013 letter is attached hereto as Exhibit B.*

*With respect to agency trips, DTS operates a Human Services Transportation Coordination Program (HSTCP), of which one component is designed specifically to wean agencies off TheHandi-Van by providing financial incentives and guidance to agencies that agree, in whole or part, to take their transportation needs off TheHandi-Van and internalize the function in their agencies. Since 2014, DTS has taken increasingly proactive steps to grow this program and DTS hopes Council will continue to fund the HSTCP program as the program costs are a fraction of direct operating costs incurred by TheHandi-Van. In addition, removing agency trips from TheHandi-Van service frees up much-needed resources for demand riders.*

*Most recently, in October 2015, following Director Formby's attendance at an American Public Transportation Association (APTA) ADA seminar in San Francisco, DTS calendared Paratransit Growth Management Plan meetings to explore additional cost-cutting and/or revenue generating measures. After the first meeting between DTS and OTS in November 2015, DTS and OTS met with the State of Hawaii Departments of Health (DOH) and Human Services (DHS) to explore the possibility of increased federal funding to the State in support of TheHandi-Van service. Both DOH and DHS, as well as the Governor's ADA coordinator, expressed an interest in pursuing a funding scheme which could be revenue neutral to the State while bringing in more revenue for TheHandi-Van. Further meetings are scheduled. See Exhibit C hereto.*

2. Complies with ADA §37.131(d), *Trip Purpose Restrictions*, by lowering the volume of agency customers or amending the practice that prioritizes agency trips over other trips;

*Response: Agree. DTS shares the Auditor's concerns and will continue its work with OTS to address these ADA issues. See preceding response.*

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3. Develops a plan to reduce the number of *No Solution Found* and *Unscheduled* trips;

*Response: Agree. DTS shares the Auditor's concerns and will work with OTS to address No Solution Found and Unscheduled trip scenarios.*

4. Improves management of subscriptions by establishing formal policies, procedures, application process, and a monitoring program to ensure that subscription levels do not exceed 50% in any operating hour (unless there is excess capacity) as required by ADA;

*Response: Agree. As noted above, subscription trips exceeding ADA service standards was a compliance issue highlighted in the June 26, 2013 DTS letter to OTS. Nevertheless, DTS shares the Auditor's concerns and will continue to work with OTS to address these issues, adopting formal policies, procedures and a monitoring program to ensure compliance with FTA ADA guidelines.*

5. Improves use of the Trapeze computer system by putting more of its paratransit operations on real-time and eliminating the reliance on manually amending trip runs;

*Response: Agree. DTS shares the Auditor's concerns and will continue its work with OTS to improve effective utilization of the Trapeze real-time scheduling software.*

6. Enforces the ADA minimum 3/4-mile service area for Handi-Van operations;

*Response: DTS understands the Auditor's concerns and will work with OTS to fully explore different alternatives to address this issue, including a discussion with Council regarding the expected impact of 3/4 mile service limitations to paratransit riders in their Districts and/or other viable options to service limitations, including but not limited to premium service charges for service beyond 3/4-mile of fixed route operations.*

7. Enforces conditional eligibility restrictions. If enforcement is deemed extraneous, DTS should re-evaluate or streamline the eligibility determination process and reduce the contract amount;

*Response: DTS understands the Auditor's concerns and will work with Innovative Paradigms (IP) and OTS to fully explore different alternatives to address this issue.*

8. Track, report, establish a performance benchmark, and develop an action plan to mitigate trips with excessive trip times;



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*Response: Agree. Although excessive trip times are currently reported in Estimated Van Arrival time (EVA), DTS shares the Auditor's concerns and will work with OTS to develop reportable metrics in the consolidated monthly report, performance benchmarks and a plan to mitigate excessive trip times.*

9. Establish a formal Customer Satisfaction/Service Quality Program to include surveying customers or convening focus groups, as appropriate, to obtain direct customer feedback;

*Response: Agree. DTS supports a proactive customer feedback program and will work with OTS and the paratransit riders to develop such a program.*

10. Continues to expand its taxi-based resources, as appropriate, so that it has a reliable resource to supplement its Handi-Van operation;

*Response: Agree. DTS supports a strategic expansion of the use of supplemental taxi services and will explore growing this lower-cost option with OTS and supplemental service providers through our Paratransit Growth Management Plan meetings.*

11. Monitors and reports to DTS Mobile Data Terminals (MDT) performance until reliability issues are satisfactorily resolved, and seek reimbursements for correcting the manufacturer defects;

*Response: Agree. DTS will work with OTS to address MDT performance, monitoring via monthly performance metric reports and seeking reimbursement from the manufacturer for self-help solutions found.*

**DTS should:**

12. Establish a comprehensive paratransit plan, inclusive of a fleet management plan, with a five-year time horizon;

*Response: Agree. DTS commenced work on a comprehensive paratransit plan in 2015, which will include a fleet management plan, with a minimum five-year time horizon. Estimated completion date: 4th quarter 2016.*

13. Reassess the need, scope, or frequency for annual audits of the fixed-route and paratransit system as required by §13-8.7, ROH; and, as necessary, request appropriate amendments to the ordinance;

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*Response: Agree. DTS appreciates the Auditor's concern regarding the appropriateness or need for annual audits. DTS will assess and make appropriate recommendations to Council.*

14. Consider establishing a tiered fare structure, through the rule-making process, that charges more for agency trips, out-of-service area trips, and other premium services not required by the ADA;

*Response: Agree. DTS shares the Auditor's concerns regarding the fiscal unsustainability of the paratransit system given the existing fare structure. In addition to its work with DOH and DHS on fares for services through state funded agencies, in concert with OTS, DTS will model different fare scenarios, including premium service charges, and discuss with Council.*

15. Improve monitoring and oversight of paratransit operations by ensuring that OTS notifies the department prior to the implementation of any significant program or operational change;

*Response: Agree. DTS has already addressed this issue with OTS but will formalize the policy in writing.*

**The Honolulu City Council should:**

16. Consider amending Revised Ordinances of Honolulu, Section 13-4.5 to increase complementary paratransit system fares and improve the cost recovery ratio; and

*Response: DTS will facilitate Council considering revisions to the existing paratransit system fare structure by providing the necessary fare models, scenarios and cost recovery versus expense data to Council.*

17. Consider amending Revised Ordinances of Honolulu, Section 13, Article 8, Transit Management Services Contractor, to separate fixed-route and paratransit operations from the mandate that the services be provided by a single operator.

*Response: DTS will facilitate Council exploring this option by providing the necessary information upon request.*

In closing, we would like to summarize some of the significant changes implemented by DTS and OTS since 2013, changes designed to improve TheHandi-Van service, reduce operational costs to taxpayers and ensure the sustainability of the system:

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**New administrative policies and management changes:**

- Mandated OTS operational use of Industry best practice real-time scheduling software, in 2014;
- Procured upgrade to real-time scheduling software necessary to implement real-time scheduling;
- Reduced the advanced reservation window from seven days to two days to discourage advance reservations with frequent cancellation and rebooking in the seven day window. DTS most recently increased the reservation window to three days;
- Adopted a new "no-show" policy designed to curb repetitive no-shows;
- Adopted a mandatory seat belt policy designed to increase passenger safety;
- Encouraged and supported OTS' hiring of a new Paratransit Vice President, Senior Service Director and Service Delivery Manager;
- Doubled the number of phone reservationists to reduce reservation call wait times;
- Proposed use of FTA Section 5310 funds for additional vehicle procurements;
- Commenced work on a paratransit management plan in 2015, scheduled for completion in 2016;

**New operational initiatives:**

- Increased agency-operated trips through expansion of our Human Services Transportation Coordination Program;
- Increased fleet size and reliability with the purchase of 99 new Handi-Vans;
- Hired additional paratransit operators to support increased service hours;
- Initiated on-going procurement of 29 standard vans and 16 mini-vans;
- Implemented mandatory use of real-time scheduling software;
- Increased Mobile Data Terminal performance rate through OTS in-house resources;
- Implemented Android tablet pilot test program to replace MDT's with lower cost Trapeze-compatible product;
- Implemented EVA web-based application to improve communication with transit riders regarding van assignments and estimated arrival times;
- Simplified trip cancellation procedures for transit riders;
- Increased use of supplemental taxi service at cost savings to the taxpayers;
- Merged safety and training with TheBus for improved consistency;
- Initiated planning for upcoming Interactive Voice Recognition (IVR) system for automated ride reminder and van arrival time calls to riders;
- Initiated coordination with HART on TheHandi-Van intermodal connections with rail stations;

Mr. Edwin S.W. Young  
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The administration and DTS appreciate the fine work of the Office of the City Auditor with respect to the paratransit system and we look forward to receiving and using the final audit report to further our efforts to reach full ADA compliance and operate a system that is financially sustainable in the long term.

Warm regards,



Roy K. Amemiya, Jr.  
Managing Director

Attachments

## Exhibit A

## Additional Suggested DTS Corrections and Clarifications

**Corrections**

Draft Audit Report, Page 6, "**Demand rider: customer calls OTS to schedule a one-way/roundtrip paratransit ride at least two-days prior to the desired trip date**" and Page 7, "**Demand Customer – customer that calls OTS to schedule a one-way/roundtrip paratransit ride at least two-days prior to the desired trip date.**" (bold original, underlining added for emphasis)

*Correction: DTS suggests the underlined portions should read, "between one to two days," currently one to three days.*

Draft Audit Report, Page 6, "**Agency Customer and Fare Types.**"

*Correction: There is only one fare type for all paratransit riders. As such, DTS suggests changing to "Fare Types."*

Draft Audit Report, Page 16, "**OTS increased use of taxi service: ADA requires that OTS provide a trip within one hour of a customer's requested pick-up time.**"

*Correction: DTS advises that "within one hour of" be revised to "within one hour before or after."*

Draft Audit Report, Page 17, "**Potential savings by using taxis: In the 2007 Compliance Action Plan for the Handi-Van, consultants explained the per-unit cost of the Handi-Van can be reduced by expanding the use of taxis and other non-dedicated service providers. By shifting shorter trips during the peak hours from the Handi-Van to other providers, the report estimated that weekday operating costs would be reduced by as much as \$57,800. The report also noted that if 5% of HandiVan trips were diverted to a taxi service, and a similar number of trips were generated, the total net savings would be about \$80,000.**" (bold original, underlining added for emphasis)

*Correction: DTS advises that, per the Nelson/Nygaard 2007 Report, the Handi-Van consultants explained the per-unit cost of the Handi-Van can be reduced by expanding the use of taxis and other non-dedicated service providers. By shifting shorter trips during the peak hours from the Handi-Van to other providers, the report estimated that weekday operating costs would be reduced by as much as \$557,800. The report also noted that if 5% of HandiVan trips were diverted to a taxi subsidy program with a cost per trip less than TheHandi-Van's average cost per trip, [service, and a similar number of trips were generated,] the total net savings would be about \$80,000.*

Draft Audit Report, Page 20, "**On-Time performance has declined 5% despite improved fleet availability. OTS defines a Handi-Van trip as on-time if the customer was picked up within a 40 minute window of +10/-30 (up to 10 minutes early or 30 minutes after the negotiated pick-up time).**" (bold original, underlining added for emphasis)

*Correction: DTS advises that the underlined portion should read, "-10/+30", and that in the corresponding Footnote 2, "(e.g. +10/-20 minutes, 0/-30 minutes, etc.)" should read, "(e.g. -10/+20 minutes, 0/+30 minutes, etc.)."*

### Clarifications

Draft Audit Report, Page 42, "In-person determinations are not required by ADA or FTA."

Clarification: *DTS would like to clarify that while in-person assessments are not required; they are considered an industry best practice for achieving accurate eligibility assessments.*

Draft Audit Report: Agency vs. Subscription Service.

Page 45, "Honolulu's subscription service violates ADA regulations and limits the paratransit service available to demand customers that call in for a trip reservation. More specifically, the OTS practice of giving priority to subscription riders, scheduling subscription trips first, and assuring subscription riders of their pick-up times reduces the capacity in the Trapeze scheduling system and reduces the chances for accommodating demand customer requests for pick-up at the requested time."

Page 49, "According to OTS, all subscription riders booking a ride under a non-profit agency program will be picked-up at their requested time. This ensures the riders meet the program hours and time constraints. Comparatively, demand riders are not guaranteed their requested pick up times and are subject to real time and negotiated pick-up times generated by the scheduling system. The inequity in service between subscription and demand riders and the lack of controls over subscriptions are problematic and need management attention."

Clarification: *DTS would like to clarify that not all subscription riders are agency clients. Non-agency subscription riders (e.g., to school or work) do not receive this higher level of service. Therefore, the distinction should be made between agency and non-agency riders, rather than subscription and non-subscription riders. DTS suggests the following revisions to the above paragraphs (suggested changes are underlined):*

Page 45, "Honolulu's service to agencies violates ADA regulations and limits the paratransit service available to non-agency customers that call in for a trip reservation. More specifically, the OTS practice of giving priority to agency riders, scheduling agency trips first, and assuring agency riders of their pick-up times reduces the capacity in the Trapeze scheduling system and reduces the chances for accommodating non-agency customer requests for pick-up at the requested time."

Page 49, "According to OTS, all [subscription] riders booking a ride under a non-profit agency program will be picked-up at their requested time. This ensures the riders meet the program hours and time constraints. Comparatively, non-agency riders are not guaranteed their requested pick up times and are subject to real time [and negotiated] pick-up times generated by the scheduling system. The inequity in service between agency and non-agency riders and the lack of controls over subscriptions are problematic and need management attention."

EXHIBIT B

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

550 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 788-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

KIRK CALDWELL  
MAYOR



MICHAEL D. FORMBY  
DIRECTOR

MARK N. GARRITY, AICP  
DEPUTY DIRECTOR

June 26, 2013

Mr. J. Roger Morton  
President and General Manager  
Oahu Transit Services, Inc.  
811 Middle Street  
Honolulu, Hawaii 96819

Dear Mr. Morton: *mf*

This is a follow-up to our conversation this afternoon. As you recall, I expressed my concern regarding the contents of proposed Resolution 13-120 (2013) which made certain assumptions about TheHandi-Van service being potentially non-compliant with the Americans with Disabilities Act (ADA).

This letter shall reconfirm the Department of Transportation Services' policy that TheHandi-Van service shall be operated at all times in general compliance with the Federal Transit Administration's ADA paratransit service standards for public transit. In particular, subscription service (rides which are repeated pre-arranged rides that only need to be scheduled once for the same days and times each week, and which travel between the same origins and destinations) shall be operated such that this service shall not absorb more than fifty percent of the number of trips available at a given time of day, unless there is non-subscription capacity.

Thank you for your immediate attention to this matter.

Very truly yours,

*Michael D. Formby*  
Michael D. Formby  
Director

EXHIBIT C

**Kuwaye, Deborah**

---

**From:** Formby, Michael  
**Sent:** Friday, October 9, 2015 10:20 AM  
**To:** Garrity, Mark N; ROGER MORTON; 'ROBERT YU'  
**Cc:** Mark, Eileen Y.; Ishiyama, Scott; Kuwaye, Deborah  
**Subject:** Paratransit  
**Attachments:** Final\_FTA\_ADA\_Circular\_C\_4710.1.pdf

On Wednesday, October 7, 2015, I attended an APTA ADA conference program, the subject of which was largely how to manage the unsustainable growth of paratransit operations. In addition, the FTA (Lisa Ford) was present to introduce and give an overview of the FTA Circular C 4710.1 dated November 4, 2015, ADA Guidance. (It is largely hailed as a great resource tool for ADA staff...with no additional regulations). For DTS, I saved the Circular to the G drive. For OTS, if you did not get your thumb drive at the conference, I have attempted to attach, although the file may be too large to send. The thumb drive is available with Debbie.

During the presentations, Orange County Transportation Authority talked about their "Paratransit Growth Management Plan," which incorporates many of the initiatives we have undertaken to date, such as 100% in-person eligibility screening, travel training for fixed route, 3 day reservation window, resource service agency trip program, lower cost alternatives (taxi's – almost 100% accessible, etc.).

Orange County also went further and restricted their full service program, called ACCESS paratransit, to 6 a.m. to 6 p.m. M-F and 6 a.m. to 2 p.m. on weekends. They cut ACCESS service beyond ¼ miles of the fixed route, improved their radio communications and introduced additional senior mobility options, all at costs lower than ACCESS. As a result, they have significantly reduced their paratransit program costs. Orange County operates roughly 550 fixed route buses and 250 paratransit vans, similar to our system.

Since we are already undertaking many of these cost-cutting measures but not under a process that allows us to get together, explore best practices elsewhere and focus on future cost containment measures, I am proposing that we organize what we have under a similar program here in DTS/OTS and meet to look at other cost cutting measures. Roger and I have already talked about meeting with DOH on their medicare program. In addition, Orange County agreed to make themselves available by telephone to discuss their program, which was designed to be prudent but not punitive.

I like the name Paratransit Growth Management Plan and would like to stand up a similar meeting here. I'll have Debbie shoot for a first meeting in November.

Let me know if you have thoughts or comments.

Mike



# Appendix A

## Short Range Transit Operations Plan, May 2012, Recommendations

	<b>Recommendation/Standard</b>	<b>OTS Standard</b>	<b>Status</b>	<b>Auditor Notes</b>
1	Cost Per Service Hour: <b>\$90</b>	Cost Per Revenue Hour: \$90	Implemented	OTS reports cost-per-revenue hour. In June 2015, the cost per revenue hour was \$85.79; in FY 2015 the average was \$88.13; in FY 2014 the average was \$89.53.
2	Cost per van passenger: <b>\$39</b>	Cost per passenger trip: \$40	Implemented	OTS reports cost per trip. In FY 2015 the average cost per trip was \$40.65; \$38.79 in FY 2014; and \$40.59 in FY 2013.
3	Cost per service mile: <b>\$6.20</b>	None	Implemented	OTS reports cost per revenue mile. In June 2015 the cost per revenue mile was \$5.54; in FY 2015 the average cost per revenue mile was \$5.86 and in FY 2014 the average was \$6.24
4	Trips per hour: <b>2.4</b>	Trips per revenue hour: 2.45	Implemented	OTS reports trips per revenue hour. In June 2015 the trips per revenue hour was 2.23; the average trips per revenue hour in FY 2015 was 2.35 and 2.46 in FY 2014.
5	Service miles per van passenger: <b>5.8</b>	None	Implemented	OTS reports <i>Average Trip Length</i> as an alternative. In June 2015, the average trip length was 9.71 miles. In FY 2015, the average trip length was 9.10 miles; in FY 2014 it was 8.35 miles.
6	Percent of trips on-time: <b>90%</b>	Percent of trips on time: 90%	Implemented	OTS reports % trips on time. In June 2015, trips on-time was 90%; the average for FY 2015 82% and FY 2014 83%.

	<b>Recommendation/Standard</b>	<b>OTS Standard</b>	<b>Status</b>	<b>Auditor Notes</b>
7	No-show/late cancellation rate <ul style="list-style-type: none"> <li>➤ No shows &lt;1.5%</li> <li>➤ Late cancellations &lt;2.5%</li> <li>➤ Cancelled at the door, &lt;3.0%</li> </ul>	No show/late cancellation rate: 8%	Implemented	OTS reports no shows and late cancellations combined. In June 2015 no-show rate was 7%. In FY 2015 the average no-show rate was 7% and it was 8% in FY 2014
8	Missed trips: <0.5%	Missed trip rate: .55%	Implemented	OTS reports the missed-trip rate. In June 2015, the average missed-trip rate was .45%; in FY 2015 the average was .69%; and in FY 2014 it was .54%.
9	Maximum hold time (calls answered within 3 minutes): 91%	Calls answered within 3 minutes: 95%	Implemented	OTS reports calls answered within 3 minutes. In June 2015, calls were answered within 3 minutes 34% of the time. In FY 2015, the average was 63% in FY 2015 and 79% in FY 2014.
10	Complaint rate (per 100,000 trips): 15	Complaint rate per 1,000 trips: 2.15	Implemented	OTS reports complaint rates per 1,000 trips. In June 2015, there were 2.15 complaints per 1,000 trips. In FY 2015, the average was 2.10 complaints per 1,000 trips and in FY 2014 it was 1.32.
11	Vehicle availability: 80%	Vehicle availability rate: 80%	Implemented	OTS reports vehicle availability. In June 2015, average availability was 86%. In FY 2015, the average was 85% and in FY 2014 it was 78%.
12	Trip denials: None	Trip denials: 0	Implemented	OTS reports trip denials. In June 2015, trip denials were 0. In FY 2015, there were 0 trips denials; in FY 2014, there were 18 trip denials.
13	Revise scheduling procedures	N/A	Implemented	Trips scheduled went from 7 days out to 2 days out.

	<b><i>Recommendation/Standard</i></b>	<b><i>OTS Standard</i></b>	<b><i>Status</i></b>	<b><i>Auditor Notes</i></b>
14	Establish demand management program		Not Fully Implemented	Although OTS implemented real-time scheduling through its Trapeze management system, in practice, OTS still relies on a manual system to accommodate customers that could not be scheduled through real-time scheduling.
15	Monitor use of taxis or other subcontractors		Implemented	OTS monitors use of taxis by receiving reports. OTS is considering expanding taxi service by entering into formal contracts.
16	Monitor time on vehicle		Not Implemented	OTS does not report average time on vehicle or number of trips that are considered "excessive." Excessive means fixed route (TheBus) +30 minutes.
17	Manage the Handi-Van fleet		Not implemented	DTS/OTS does not have a formal paratransit or fleet management plan.
18	Establish customer satisfaction/service quality program		Not fully implemented	OTS tracks and reports number of complaints, type of complaints, and commendations. However, it does not routinely survey customers.

Source: OCA and Oahu Transit Services

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# Appendix B

## ADA Service Requirement Compliance

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The city's paratransit services has eight ADA Service Criteria Requirements that are used to monitor and measure the city's performance. The table below describes how/if the city's current service level aligns with the city's requirement to meet ADA minimum guidelines.

ADA Requirement	ADA Service Criteria	ADA Minimal Requirement/ Policy	City and County of Honolulu Current Service Level	City and County of Honolulu
<p><b>Hours and days of service</b></p>	<p>37.131(e):  <b>Hours and days of service.</b> The complementary paratransit service shall be available throughout the same hours and days as the entity's fixed route service.</p>	<p>Same as fixed route</p>	<p>Handi-Van service is generally available throughout Oahu, Mondays through 4:00 a.m. through 1:00 a.m.</p> <p>All-day-all-night service (24 hours per day) is available in areas located within three-fourths (¾) of a mile of TheBus Routes 2 and 40.</p>	<p>Meets ADA Requirements</p>
<p><b>Geographical area of service</b></p>	<p>37.131(a)(i,ii,iii,iv) and (3):  <b>(i)</b> The entity shall provide complementary paratransit service to origins and destinations within corridors with a width of three-fourths of a mile on each side of each fixed route. The corridor shall include an area with a three-fourths of a mile radius at the ends of each fixed route.  <b>(ii)</b> Within the core service area, the entity also shall provide service to small areas not inside any of the corridors but which are surrounded by corridors.  <b>(iii)</b> Outside the core service area, the entity may designate corridors with widths from three-fourths of a mile up to one and one half miles on each side of a fixed route, based on local circumstances.  <b>(iv)</b> For purposes of this paragraph, the core service area is that area in which corridors with a width of three-fourths of a mile on each side of each fixed route merge together such that, with few and small exceptions, all origins and destinations within the area would be served.  <b>(3) Jurisdictional boundaries.</b> Notwithstanding any other provision of this paragraph, an entity is not required to provide paratransit service in an area outside the boundaries of the jurisdiction(s) in which it operates, if the entity does not have legal authority to operate in that area. The entity shall take all practicable steps to provide paratransit service to any part of its service area.</p>	<p>Within ¾ mile of fixed route</p>	<p>Handi-Van service is generally available throughout Oahu, All-day-all-night service (24 hours per day) is available in areas located within three-fourths (¾) of a mile of TheBus Routes 2 and 40.</p>	<p>Meets ADA Requirements</p>
<p><b>Advance reservation time</b></p>	<p>37.131(b)(1)(3)(4):  <b>(1)</b> The entity shall make reservation service available during at least all normal business hours of the entity's administrative offices, as well as during times, comparable to normal business hours, on a day when the entity's offices are not open before a service day.  <b>(4)</b> The entity may permit advance reservations to be made up to 14 days in advance of an ADA paratransit eligible individual's desired trips. When an entity proposes to change its reservations system, it shall comply with the public participation requirements equivalent to those of § 37.137 (b) and (c).  <b>(3)</b> The entity may use real-time scheduling in providing complementary paratransit service.</p>	<p>Day before to 14 days in advance</p>	<p>Reservations are accepted from one (1) day in advance and up to two (2) days in advance.  <b>Same-day reservations are allowable only on a space available basis.</b></p>	<p>Meets ADA Requirements</p>

ADA Requirement	ADA Service Criteria	ADA Minimal Requirement/ Policy	City and County of Honolulu Current Service Level	City and County of Honolulu
<p><b>Trip request window</b></p>	<p>37.131(b)(2):                      (2) The entity may negotiate pickup times with the individual, but the entity shall not require an ADA paratransit eligible individual to schedule a trip to begin more than one hour before or after the individual's desired departure time.</p>	<p>1 hour on either side</p>	<p>The Reservationist may negotiate a pickup time that is up to sixty (60) minutes before or after your requested pickup time.</p>	<p>Meets ADA Requirements</p>
<p><b>Trip denials/capacity constraints/service availability</b></p>	<p>37.131(f)(1)(2)(3)(A)(B)(C)(ii):                      (f) <i>Capacity constraints.</i> The entity shall not limit the availability of complementary paratransit service to ADA paratransit eligible individuals by any of the following:                      (1) Restrictions on the number of trips an individual will be provided;                      (2) Waiting lists for access to the service; or                      (3) Any operational pattern or practice that significantly limits the availability of service to ADA paratransit eligible persons.                      (i) Such patterns or practices include, but are not limited to, the following:                      (A) Substantial numbers of significantly untimely pickups for initial or return trips;                      (B) Substantial numbers of trip denials or missed trips;                      (C) Substantial numbers of trips with excessive trip lengths.                      (ii) Operational problems attributable to causes beyond the control of the entity (including, but not limited to, weather or traffic conditions affecting all vehicular traffic that were not anticipated at the time a trip was scheduled) shall not be a basis for determining that such a pattern or practice exists.</p>	<p>Not allowed</p>	<p>Subscriptions exceed 50% of total service during peak hours limiting on demand ridership.                       No Solution Found list exposes the capacity restraints of the current system and van availability to meet capacity request.</p>	<p>Does not meet ADA Requirements</p>
<p><b>Fares</b></p>	<p>37.131(c)(1)(2)(3)(4):                      (c) <i>Fares.</i> The fare for a trip charged to an ADA paratransit eligible user of the complementary paratransit service shall not exceed twice the fare that would be charged to an individual paying full fare (i.e., without regard to discounts) for a trip of similar length, at a similar time of day, on the entity's fixed route system.                      (1) In calculating the full fare that would be paid by an individual using the fixed route system, the entity may include transfer and premium charges applicable to a trip of similar length, at a similar time of day, on the fixed route system.                      (2) The fares for individuals accompanying ADA paratransit eligible individuals, who are provided service under § 37.123(f) of this part, shall be the same as for the ADA paratransit eligible individuals they are accompanying.                      (3) A personal care attendant shall not be charged for complementary paratransit service.                      (4) The entity may charge a fare higher than otherwise permitted by this paragraph to a social service agency or other organization for agency trips (i.e., trips guaranteed to the organization).</p>	<p>Twice fixed-route fare</p>	<p>Handi-Van-fare of \$2.00 per person per one-way passenger trip.</p>	<p>Meets ADA Requirements</p>

ADA Requirement	ADA Service Criteria	ADA Minimal Requirement/ Policy	City and County of Honolulu Current Service Level	City and County of Honolulu
<p><b>Restrictions or priorities based on trip purpose</b></p>	<p>37.131(d): <b>Trip purpose restrictions.</b> The entity shall not impose restrictions or priorities based on trip purpose.</p>	<p>Not allowed</p>	<p>Subscriptions are scheduled first and agency trips are prioritized to meet agency program demand and hours.</p>	<p>Does not meet ADA Requirements</p>
<p><b>Level of service</b></p>	<p>37.129 (a) (a) Except as provided in this section, complementary paratransit service for ADA paratransit eligible persons shall be origin-to-destination service.  *Effective July 13, 2015 <i>Origin-to-destination service</i> means providing service from a passenger's origin to the passenger's destination. A provider may provide ADA complementary paratransit in a curb-to curb or door-to-door mode. When an ADA paratransit operator chooses curb to- curb as its primary means of providing service, it must provide assistance to those passengers who need assistance beyond the curb in order to use the service unless such assistance would result in a fundamental alteration or direct threat.</p>	<p>Curb-to curb or Door-to-door</p>	<p>Provides standard curb-to-curb service as well as additional assistance door-to-door to riders who, due to their disabilities and (upon advanced notice at the time of trip reservation)** , need assistance beyond the curb. Door-to-door service means Operators will provide assistance to and from the vehicle and the door of the establishment if needed by the rider; however, Operators cannot enter buildings nor do they assume the role of a Personal Care Attendant (PCA).</p>	<p>Meets ADA Requirements</p>

\*\* Advanced notification is recommended, but not required. In the absence of advanced notification, drivers are required to make their best effort to accommodate the request.

Source: 49 CFR Subtitle A, Part 37 – Transportation Services for Individuals With Disabilities (ADA), Oahu Transit Services, and Office of the City Auditor



# Appendix C

## Additional ADA Guidelines

<b>Additional Services</b>	<b>ADA Reference</b>	<b>ADA Minimal Requirement/Policy</b>	<b>City and County of Honolulu Current Service Level</b>	<b>City and County of Honolulu</b>
<b>Subscription service</b>	<p>37.133 (a)(b)(c);</p> <p>(a) This part does not prohibit the use of subscription service by public entities as part of a complementary paratransit system, subject to the limitations in this section.</p> <p>(b) Subscription service may not absorb more than fifty percent of the number of trips available at a given time of day, unless there is non- subscription capacity.</p> <p>(c) Notwithstanding any other provision of this part, the entity may establish waiting lists or other capacity constraints and trip purpose restrictions or priorities for participation in the subscription service only.</p>	No more than 50% of total service if demand is not met; no restriction if demand is met.	Subscriptions exceed 50% of total service during peak hours limiting on demand ridership.	Does Not Meet ADA Requirements
<b>Trip by trip/conditional eligibility</b>	<p>37.129 (b)</p> <p>(b) Complementary paratransit service for ADA paratransit eligible persons described in Sec. 37.123(e)(2) of this part may also be provided by on-call bus service or paratransit feeder service to an accessible fixed route, where such service enables the individual to use the fixed route bus system for his or her trip.</p> <p>(c) Complementary paratransit service for ADA eligible persons described in Sec. 37.123(e)(3) of this part also may be provided by paratransit feeder service to and/or from an accessible fixed route.</p> <p>37.123(e)(3)(i)(ii)</p> <p>(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.</p> <p>(i) Only a specific impairment-related condition which prevents the individual from traveling to a boarding location or from a disembarking location is a basis for eligibility under this paragraph. A condition which makes traveling to boarding location or from a disembarking location more difficult for a person with a specific impairment-related condition than for an individual who does not have the condition, but does not prevent the travel, is not a basis for eligibility under this paragraph.</p> <p>(ii) 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.</p>	Encouraged	Unconditional eligibility	*Meets ADA Requirements

\*Conditional Eligibility is determined, but not enforced.

<b>Additional Services</b>	<b>ADA Reference</b>	<b>ADA Minimal Requirement/Policy</b>	<b>City and County of Honolulu Current Service Level</b>	<b>City and County of Honolulu</b>
<b>No shows</b>	37.125 (h) (h) The entity may establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit service to ADA eligible individuals who establish a pattern or practice of missing scheduled trips.	Allows penalties, including suspension of service for repeated no-shows.	<p>Riders who have repeated "no-shows" may be suspended from Handi-Van service.</p> <p>All unexcused No-Shows and Late Cancellations will be calculated as a percentage of the total number of one-way ride reservations made by a rider during a calendar-month period.</p> <p>Rider will be deemed to have a record of <i>Excessive No-Shows/Late Cancellations</i> if the sum of their unexcused No-Shows and Late Cancellations constitutes <math>\geq 20\%</math> of the total number of one-way ride reservations made by the Rider during a given calendar month.</p> <p>A Rider will be deemed to exhibit a pattern and practice of <i>Excessive No-Shows/Late Cancellations</i> when for two (2) consecutive calendar months, the sum of their unexcused No-Shows and Late Cancellations constitutes <math>\geq 20\%</math> of the total number of one-way ride reservations made by the rider during a given calendar month.</p> <p>Penalties of progressive severity will be imposed on Riders exhibiting a continuing pattern and practice of <i>Excessive No-Shows/Late Cancellations</i>.</p> <p>Riders will receive information on their accumulated No-Shows/Late Cancellations records and penalties in writing.</p>	**Meets ADA Requirements

\*\*OTS temporarily halted enforcement of the no-show policy in January 2015 during the start-up phase of real-time scheduling. Enforcement resumed in June 2015.

Source: 49 CFR Subtitle A, Part 37 – Transportation Services for Individuals With Disabilities (ADA), Oahu Transit Services, and Office of the City Auditor

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# Appendix D

## Paratransit Operations – City Comparison

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To compare and contrast Honolulu’s paratransit program with Americans with Disabilities Act (ADA) requirements and other jurisdictions, we examined requirements under the ADA and assessed paratransit services provided by the City and County of Honolulu. We also reviewed comparable paratransit services provided by King County, WA; Portland, OR; Denver, CO; Minneapolis, MN; and; Sacramento, CA.

**Honolulu, HI**

ADA Requirement	ADA Minimal Requirement/Policy	City and County of Honolulu Current Service Level	City and County of Honolulu
Hours and days of service 37.131(e)	Same as fixed route	Handi-Van service is generally available throughout Oahu, Mondays through Sundays, from about 4:00 a.m. through 1:00 a.m.  All-day-all-night service (24 hours per day) is available in areas located within three-fourths (¾) of a mile of TheBus Routes 2 and 40.	Meets ADA Requirements
Geographical area of service 37.131(a)(i,ii,iii,iv) and (3)	Within ¾ mile of fixed	Handi-Van service is generally available throughout Oahu, All-day-all-night service (24 hours per day) is available in areas located within three-fourths (¾) of a mile of TheBus Routes 2 and 40.	Meets ADA Requirements
Advance reservation time 37.131(b)(1)(3)(4)	Day before to 14 days in advance	Reservations are accepted from one (1) day in advance and up to two (2) days in advance. Same-day reservations are allowable <u>only</u> on a space available basis.	Meets ADA Requirements
Trip request window 37.131(b)(2)	1 hour on either side	The Reservationist may negotiate a pickup time that is up to sixty (60) minutes before or after your requested pickup time.	Meets ADA Requirements
Trip denials/capacity constraints/service availability 37.131(f)(1)(2)(3)(A) (B)(C)(ii)	Not allowed	Subscriptions exceed 50% of total service during peak hours limiting on demand ridership. No Solution Found list exposes the capacity restraints of the current system and van availability to meet capacity request.	Does not meet ADA Requirements
Fares 37.131(c)(1)(2)(3)(4)	Not to exceed twice fixed-route fare	Handi-Van-fare of \$2.00 per person per one-way passenger trip.	Meets ADA Requirements
Restrictions or priorities based on trip purpose 37.131(d)	Not allowed	Subscriptions are scheduled first and agency trips are prioritized to meet agency program demand and hours.	Does not meet ADA Requirements
Level of service 37.129 (a)	Curb-to curb or Door-to-door	Provides standard curb-to-curb service as well as additional assistance door-to-door to riders who, due to their disabilities and (upon advanced notice at the time of trip reservation), need assistance beyond the curb. Door-to-door service means Operators will provide assistance to and from the vehicle and the door of the establishment if needed by the rider; however, Operators cannot enter buildings nor do they assume the role of a Personal Care Attendant (PCA).	Meets ADA Requirements

ADA Requirement	ADA Minimal Requirement/Policy	City and County of Honolulu Current Service Level	City and County of Honolulu
Subscription service 37.133 (a)(b)(c)	No more than 50% of total service if demand is not met; no restriction if demand is met	Subscriptions exceed 50% of total service during peak hours limiting on demand ridership.	Does Not Meet ADA Requirements
Trip by trip/conditional eligibility 37.129 (b) 37.123(e)(3)(i)(ii)	Encouraged-Pt. 37, App.D Section 37.123 ADA Paratransit Eligibility Standards: Trip-by-Trip Eligibility	Conditional Eligibility not enforced	Meets ADA Requirements
No shows 37.125 (h)	Allows penalties including suspension of service for repeated no-shows.-Pt. 37, App.D Section 37.125 ADA Paratransit Eligibility Process	<p>Riders who have repeated no-shows may be suspended from TheHandi-Van service.</p> <p>A Rider will be deemed to have a record of Excessive No-Shows/Late Cancellations if the sum of their unexcused No-Shows and Late Cancellations constitutes &gt;20% of the total number of one-way ride reservations made by the Rider during a given calendar month.</p> <p>A Rider will be deemed to exhibit a pattern and practice of Excessive No-Shows/Late Cancellations when for two (2) consecutive calendar months, the sun of their unexcused No-Shows and Late Cancellations constitutes &gt;20% of the total number of one-way ride reservations made by the rider during a given calendar month.</p> <p>Penalties of progressive severity will be imposed on Riders exhibiting a continuing pattern and practice of Excessive No-Shows/Late Cancellations .</p> <p>Riders will receive information on their accumulated No-Shows/Late Cancellations records and penalties in writing.</p>	Meets ADA Requirements

**King County, WA**

ADA Requirement	ADA Minimal Requirement/Policy	King County Current Service Level	King County
Hours and days of service 37.131(e)	Same as fixed route	Reservations and Customer Service: Normal business hours: 7 days a week, 8 a.m. - 5 p.m. Ride Status: 24 hours, 7 days a week	Meets ADA Requirements
Geographical area of service 37.131(a)(i,ii,iii,iv) and (3)	Within ¾ mile of fixed	The ADA Paratransit Program provides next-day, shared rides on Access Transportation within ¾ of a mile on either side of non-commuter fixed route bus service during the times and on the days those routes are operating.  Eligible individuals can also: Travel to adjoining counties on the days and times their paratransit service operates Expanded Rural Service- Access service extends further that what the ADA requires in eastern King County and in pockets of rural King County not served by buses. Local community funds the additional Access services that go beyond the ADA. Additional services may also be cut if there is no funding available.	Meets ADA Requirements
Advance reservation time 37.131(b)(1)(3)(4)	Day before to 14 days in advance	Reservations are accepted from one (1) day in advance and up to three (3) days in advance. Trips cannot be booked for the same day.	Meets ADA Requirements
Trip request window 37.131(b)(2)	1 hour on either side	Customers are given the first available pick-up within an hour before or after their requested time.	Meets ADA Requirements
Trip denials/capacity constraints/service availability 37.131(f)(1)(2)(3)(A) (B)(C)(ii)	Not allowed		Meets ADA Requirements
Fares 37.131(c)(1)(2)(3)(4)	Twice fixed-route fare	Access Fare of \$1.75 per person per one-way passenger trip.	Meets ADA Requirements
Restrictions or priorities based on trip purpose 37.131(d)	Not allowed		
Level of service 37.129 (a)	Curb-to curb or Door-to-door	Provides standard curb-to-curb service as well as additional assistance door-to-door to riders who, due to their disabilities and (upon advanced notice at the time of trip reservation), need assistance beyond the curb. Door-to-door service is only available when the driver can safely park close enough so they can see the van from the building entrance.	Meets ADA Requirements

ADA Requirement	ADA Minimal Requirement/Policy	King County Current Service Level	King County
<p>Subscription service 37.133 (a)(b)(c)</p>	<p>No more than 50% of total service if demand is not met; no restriction if demand is met</p>	<p>Riders are picked up and taken to the same place, at the same time, on the same day, every day, every week. Subscription rides are cancelled on holidays, riders must call if they still need a ride. Subscriptions can be set up by calling reservations.</p>	<p>Meets ADA Requirements</p>
<p>Trip by trip/conditional eligibility 37.129 (b) 37.123(e)(3)(i)(ii)</p>	<p>Encouraged-Pt. 37, App.D Section 37.123 ADA Paratransit Eligibility Standards: Trip-by-Trip Eligibility</p>	<p>Conditional Eligibility enforced. Customers are either certified as fully eligible or conditionally eligible. Certification determination is valid for up to three years.  Fully eligible means there are barriers to riding the bus or light rail because of the limits of the client's disability. They are deemed eligible at any time to take transit and book a trip on Access.  Conditionally eligible means there are barriers to a client riding the bus or light rail but they might not always be present. These barriers are listed in the client's certification letter. Clients are to ride the bus and light rail when those barriers are not there.</p>	<p>Meets ADA Requirements</p>
<p>No shows 37.125 (h)</p>	<p>Allows penalties, including suspension of service for repeated no-shows.-Pt. 37, App.D Section 37.125 ADA Paratransit Eligibility Process</p>	<p>Access customers are suspended if they have too many no-shows. Every no-show means that taxpayer's money was wasted; no-shows are taken seriously. No-show or late cancellation are recorded:  If the ride is cancelled less than 2 hours before it is scheduled to begin.  If the rider is not at the agreed upon pick-up spot during the 30-minute pick-up window or  If the rider doesn't board within five minutes from when the Access van arrives during the 30-minute pick-up window.</p>	<p>Meets ADA Requirements</p>

**Portland, OR**

ADA Requirement	ADA Minimal Requirement/Policy	Portland Service Level	Portland
Hours and days of service 37.131(e)	Same as fixed route	LIFT is open during all hours that service is in operation, from 5 a.m. to 1:45 a.m. daily. Reservations are taken from 7 a.m. to 6 p.m. daily. Reservations for next-day trips must be made no later than 5 p.m. the day before.	Meets ADA Requirements
Geographical area of service 37.131(a)(i,ii,iv) and (3)	Within ¾ mile of fixed	<ul style="list-style-type: none"> <li>The LIFT service area boundary corresponds with fixed route service on weekdays, evenings and weekends.</li> <li>The LIFT service area covers all locations that are within three-fourths of a mile of TriMet's bus and MAX Light Rail and also within the TriMet district. All locations inside the service area boundary are served.</li> <li>LIFT does not serve locations outside the TriMet District, the legal boundary for TriMet.</li> <li>LIFT uses a fleet of small buses, mini-vans and taxicabs to provide service.</li> </ul>	Meets ADA Requirements
Advance reservation time 37.131(b)(1)(3)(4)	Day before to 14 days in advance	<ul style="list-style-type: none"> <li>Reservations can be reserved up to seven (7) days in advance of the trip.</li> <li>Rides for the next day must be reserved no later than 5 p.m. the day before.</li> </ul>	Meets ADA Requirements
Trip request window 37.131(b)(2)	1 hour on either side	<ul style="list-style-type: none"> <li>LIFT customers may choose to have their trip scheduled based on either the time they wish to be picked up, or the time they wish to arrive at their destination.</li> <li>The scheduled pick-up time may be up to 60 minutes earlier or later than requested in order to accommodate other trips being served.</li> </ul>	Meets ADA Requirements
Trip denials/capacity constraints/service availability 37.131(f)(1)(2)(3)(A)(B)(C)(ii)	Not allowed	The LIFT Program does not discriminate on any basis in providing its services to eligible customers. Under ADA regulations, however, TriMet may refuse or suspend LIFT service to individuals who engage in violent, seriously disruptive or illegal conduct.	Meets ADA Requirements
Fares 37.131(c)(1)(2)(3)(4)	Twice fixed-route fare	Lift Ticket system- \$2.50 per one way ticket. Tickets, punch cards and passes can be used to ride fixed route, rail and paratransit lift services. Rates and payment options vary by type of service and type of payment used. See policies on fares and rates.	Meets ADA Requirements
Restrictions or priorities based on trip purpose 37.131(d)	Not allowed		



ADA Requirement	ADA Minimal Requirement/Policy	Portland Service Level	Portland
<p>Level of service 37.129 (a)</p>	<p>Curb-to curb or Door-to-door</p>	<p>LIFT operators help customers with:</p> <ul style="list-style-type: none"> <li>• Getting from door or designated stop location to the LIFT vehicle.</li> <li>• Getting in and out of the vehicle (if the customer is unable to use the bus steps, customers may stand on the bus lift platform to get on and off)</li> </ul>	<p>Meets ADA Requirements</p>
<p>Subscription service 37.133 (a)(b)(c)</p>	<p>No more than 50% of total service if demand is not met; no restriction if demand is met</p>	<p>Subscription Trip: Customers may request a "subscription" reservation for a recurring trip that meets the following criteria:</p> <ul style="list-style-type: none"> <li>• trip is taken at least once each week on the same day</li> <li>• trip is between the same locations, and at the same time</li> <li>• trip has been taken consistently over the previous 30-day period</li> <li>• trip is expected to continue for at least six months</li> </ul>	<p>Meets ADA Requirements</p>
<p>Trip by trip/conditional eligibility 37.129 (b) 37.123(e)(3)(i)(ii)</p>	<p>Encouraged-Pt. 37, App.D Section 37.123 ADA Paratransit Eligibility Standards: Trip-by-Trip Eligibility</p>	<p>Conditional Eligibility not enforced. Conditional eligibility includes a description of certain circumstances or "conditions" when the person is unable to use fixed-route services and would qualify to use the LIFT service. Currently, LIFT relies on the individual to decide when they need to use LIFT service for any specific trip.</p>	<p>Meets ADA Requirements</p>
<p>No shows 37.125 (h)</p>	<p>Allows penalties, including suspension of service for repeated no-shows.-Pt. 37, App.D Section 37.125 ADA Paratransit Eligibility Process</p>	<p>No-Show A demonstrated pattern of no-shows (late cancellations of unneeded rides, not present or ready to board when LIFT vehicle arrives) is seriously disruptive to LIFT service. Within a 30-day period, three or more no-shows, OR no-shows which are 10 percent of completed trips (whichever is greater), will be grounds for service suspension. Only no-shows and late cancellations which are within the customer's control will be counted toward the policy. Cancellations made less than sixty-one (61) minutes in advance of the pick-up time, a cancellation at the door, or not being present or ready to leave within five minutes after the vehicle operator comes to the door are all considered no-show. Subscription reservations must be taken at least 75 percent of the time (cancellations and/or no-shows may not exceed 25 percent). Subscription reservations with excessive cancellations and/or no-shows will not be continued.</p>	<p>Meets ADA Requirements</p>

**Denver, CO**

ADA Requirement	ADA Minimal Requirement/Policy	Denver Service Level	Denver
Hours and days of service 37.131(e)	Same as fixed route	<p>Access-a-Ride Reservations 8:00 a.m. – 5:00 p.m. (7 days a week)</p> <p>Access-a-Ride Dispatch 24 hours / 7 days a week</p> <p>Access-a-Ride Dispatch 24 hours / 7 days a week</p> <p>Access-a-Cab 7 days a week 6:00am – 9:00pm</p>	Meets ADA Requirements
Geographical area of service 37.131(a)(i,iii,iv) and (3)	Within ¼ mile of fixed	<p>Access-a-Ride service operates in the same areas and during the same days and hours as the fixed route non-commuter bus service.</p> <p>Access-a-Ride is designed to be "comparable to" (or similar to) RTD's non-commuter fixed route bus and light rail service. For this reason, ADA Paratransit service is only required to transport passengers to and from locations which are within three-quarters (¾) of a mile during the same days and hours of RTD's existing fixed route bus and light rail services. Points of origin and destination not within this three-quarters (¾) of a mile corridor are not eligible for curb-to-curb pickup.</p>	Meets ADA Requirements
Advance reservation time 37.131(b)(1)(3)(4)	Day before to 14 days in advance	<p>Access-a-Ride service must be reserved 1-3 days in advance.</p> <p>Access-a-Cab Reservations are taken seven (7) days a week from 6:00 a.m. to 9:00 p.m. The trip information is sent to the cab company as soon as the reservation is made, so the passenger must be ready to travel within the next fifteen minutes to an hour, depending on cab availability. There is a limit of four (4) one-way trips per 24-hour period on Access-a-Cab.</p>	Meets ADA Requirements
Trip request window 37.131(b)(2)	1 hour on either side	<p>Access-a-Ride may offer travel times of up to sixty (60) minutes / 1-hour before or up to sixty (60) minutes / 1-hour after the requested travel time as established as service criteria under the Americans with Disabilities Act (ADA) of 1990.</p> <p>*THERE MUST BE AT LEAST ONE (1) HOUR ELAPSED TIME BETWEEN YOUR DROP OFF AND PICK UP TIMES.</p>	Meets ADA Requirements
Trip denials/capacity constraints/service availability 37.131(f)(1)(2)(3)(A) (B)(C)(ii)	Not allowed		

ADA Requirement	ADA Minimal Requirement/Policy	Denver Service Level	Denver
<p>Fares 37.131(c)(1)(2)(3)(4)</p>	<p>Twice fixed-route fare</p>	<p>Access-a-Ride Fares Fares for Access-a-Ride services are twice the fare for the same trip on an RTD bus. Denver Local \$ 4.50 Boulder Local \$ 4.50 Longmont Local \$ 4.50  Regular Fixed Route Fares Passengers on the Access-a-Ride service can, at times, use regular buses when they are feeling well enough to do so. For those occasions passengers may board at no charge as long as they display their Access-a-Ride ID card to the bus operator.  Access-a-Cab Passenger pays the first \$2.00 of the fare and any amount over a total one-way fare of \$14.00.</p>	<p>Meets ADA Requirements</p>
<p>Restrictions or priorities based on trip purpose 37.131(d)</p>	<p>Not allowed</p>		
<p>Level of service 37.129 (a)  Subscription service 37.133 (a)(b)(c)</p>	<p>Curb-to curb or Door-to-door  No more than 50% of total service if demand is not met; no restriction if demand is met</p>	<p>RTD Paratransit Services, Access-a-Ride, provides curb-to-curb public transportation.  Subscription Trip: Subscription Service is limited to passengers traveling to the same place at the same time at least three (3) times a week. RTD offers a subscription service on a space available basis and may prioritize service as needed.  RTD will terminate any Subscription Services that are canceled 50% or more of the time during any thirty (30) calendar day period, or if there is a consistent pattern of cancellations of any part of a subscription. If, for whatever reason there is a request for a schedule change to the subscription service, Access-a-Ride may not be able to accommodate the request, which will place the passenger on a waiting list.</p>	<p>Meets ADA Requirements  Meets ADA Requirements</p>
<p>Trip by Trip/conditional eligibility 37.129 (b) 37.123(e)(3)(i)(ii)</p>	<p>Encouraged-Pt. 37 App.D Section 37.123 ADA Paratransit Eligibility Standards: Trip-by-Trip Eligibility</p>	<p>Conditional Eligibility enforced. Based on individual needs, applicants may qualify for any of the following types of eligibility: Unrestricted – Full service for up to four (4) years.  Conditional – Any conditions applied to service is done so on an individual basis depending on the needs of the passenger.</p>	<p>Meets ADA Requirements</p>
<p>No shows 37.125 (f)</p>	<p>Allows penalties, including suspension of service for repeated no-shows -Pt. 37, App.D Section 37.125 ADA Paratransit Eligibility Process</p>	<p>A No Show occurs when: The vehicle arrives on time, but the customer no longer wants the ride, or The vehicle arrives on time, but the driver cannot locate the customer at the requested pick-up location, or The vehicle arrives on time, and waits for six (6) minutes, but the customer is not ready to go, and the driver must leave to stay on schedule.  Each trip that is no-showed is assessed independently in accordance with ADA regulations.  Four (4) "No Shows" in a rolling 30-calendar-day period results in a two week suspension of service. Prior to issuing a suspension, the passenger's frequency of travel will be considered.</p>	<p>Meets ADA Requirements</p>

**Minneapolis, MN**

ADA Requirement Hours and days of service 37.131(e)	ADA Minimal Requirement/Policy Same as fixed route	Minneapolis Current Service Level	Minneapolis Meets ADA Requirements
Geographical area of service 37.131(a)(i,iii,iv) and (3)	Within ¼ mile of fixed	Complementary to the public fixed-route transit service, operating in communities and at times when fixed-route transit service is available.  Reservations are taken seven days per week between the hours of 6 a.m. and 5 p.m.  Fax or email will be scheduled twice each day. AM – Between 5:00 a.m. and 6:00 a.m.   PM – Between 12:00 p.m. and 1:00 p.m.	Meets ADA Requirements
Advance reservation time 37.131(b)(1)(3)(4)	Day before to 14 days in advance	Metro Mobility provides service in areas served by all day local fixed-route transit service and the area designated by the state Legislature known as the "Transit Taxing District." Service hours are adjusted by community as changes are made to the regular fixed-route transit schedule.  The Metro Mobility service area is divided among three separate service contractors (beginning June 2015). Customers are assigned to a service contractor based on their home address. The service contractor is responsible for scheduling and coordinating all of the customer's trips regardless of pickup or drop-off location.  The three service area contractors are Transit Team, First Transit East and First Transit South.	Meets ADA Requirements
Trip request window 37.131(b)(2)	1 hour on either side	Certified riders may reserve a ride up to four days in advance, or as little as one day in advance.  Customers may reserve a ride either by calling their provider or by using the online internet based reservation system. The online reservation system can be used to schedule or cancel a future ride.  Rides can also be scheduled by fax or email. Requests for rides submitted by fax or email that come in after 1:00 p.m. will not be considered until the following day at 5:00 a.m.  Same-day ride requests will not be considered when submitted via fax or email.  Same-day rides Due to the number of trips scheduled on Metro Mobility, same-day trip requests are not accepted during our peak travel times of 5:00 a.m. to 8:00 p.m.	Meets ADA Requirements
Trip denials/capacity constraints/service availability 37.131(f)(1)(2)(3)(A) (B)(C)(f)	Not allowed	Reservationist offer customers the best available times, based on the buses in the area. To accommodate all rides, reservationists look one hour before and one hour after customer requested time.	Meets ADA Requirements
Fares 37.131(c)(1)(2)(3)(4)	Twice fixed-route fare	Peak Time \$4.00 (Monday- Friday, 6 a.m.-9 a.m. and 3 p.m.-6:30 p.m.)  Off-Peak Hours \$3.00  Holidays all day \$3.00  Downtown Fare Zone \$1.00  Customers are not required to pay the fare if the vehicle arrives more than 30 minutes after the scheduled pickup time.	
Restrictions or priorities based on trip purpose 37.131(d)	Not allowed		

ADA Requirement	ADA Minimal Requirement/Policy	Minneapolis Current Service Level	Minneapolis
Level of service 37.129 (a)	Curb-to curb or Door-to-door	Metro Mobility drivers must assist every rider between the vehicle and the first entry door of the pickup and drop-off. This assistance can include support when walking or pushing a wheelchair. Drivers are not permitted to go beyond the first entrance of any building. Riders who need additional assistance may bring a personal care attendant (PCA) to ride with them at no charge.	Meets ADA Requirements
Subscription service 37.133 (a)(b)(c)	No more than 50% of total service if demand is not met; no restriction if demand is met	<p>A standing order automatically schedules trips for the customer. Customers can request standing orders for routine trips going from the same origin address to the same destination address at the same day of the week, at the same time of day, and at least one day a week. Not all standing order requests are granted. The Metro Mobility Service Center limits the number of standing orders to ensure that there is room on the system for customers who have trip needs that change from week to week.</p> <p>Standing order rides are considered for:</p> <ul style="list-style-type: none"> <li>Rides going from the same place to the same place at the same time on the same day of the week.</li> <li>Rides that will be consistent for at least six months.</li> <li>Customers who have not had their standing order canceled in the past year due to lack of use.</li> </ul> <p>Standing orders are reserved for people who travel regularly. If a customer cancels or no-shows 40% of their standing order trips, their standing order may be canceled by the Metro Mobility Service Center. If this happens customers will not be granted another standing order for a period of 12 months.</p>	Meets ADA Requirements
Trip by trip/conditional eligibility 37.129 (b) 37.123(e)(3)(i)(ii)	Encouraged-Pt. 37, App.D Section 37.123 ADA Paratransit Eligibility Standards: Trip-by-Trip Eligibility	<p>Conditional Eligibility enforced. Customers are either certified as fully eligible or conditionally eligible. Certification determination is valid for up to three years.</p> <p>Fully eligible means there are barriers to riding the bus or light rail because of the limits of the client's disability. They are deemed eligible at any time to take transit and book a trip on Access.</p> <p>Conditionally eligible means there are barriers to a client riding the bus or light rail but they might not always be present. These barriers are listed in the client's certification letter. Clients are to ride the bus and light rail when those barriers are not there.</p>	Meets ADA Requirements
No shows 37.125 (h)	Allows penalties, including suspension of service for repeated no-shows.-Pt. 37, App.D Section 37.125 ADA Paratransit Eligibility Process	<p>A "No Show" is characterized by any of the following:</p> <ul style="list-style-type: none"> <li>Canceling a ride less than one hour before the scheduled ready time.</li> <li>Canceling or refusing to ride when the vehicle arrives within the 30-minute pickup window.</li> <li>Not being at the designated pickup point at the ready time and during the 30-minute pickup window.</li> </ul> <p>"No Shows" process</p> <p>Riders who accumulate three No Shows amounting to more than 4% of their requested trips within a 30-day period will receive a warning letter from their provider. If the rider receives a fourth No Show within 30 days of the first no show, amounting to more than 4% of their requested trips first No Show they may be suspended. The suspension will begin approximately 30 days after the fourth No Show. The term of the suspension period may be increased based on the number of previous suspensions within a 12-month period.</p> <p>Each trip must be considered separately. If a rider "No Shows" the outgoing leg of their trip and does not cancel their other scheduled trips for that day each trip the rider misses is counted as a No Show.</p>	Meets ADA Requirements

**Sacramento, CA**

ADA Requirement	ADA Minimal Requirement/Policy	Sacramento Service Level	Sacramento
Hours and days of service 37.131(e)(4):8C114-94:10C114-94:124:11	Same as fixed route	ADA paratransit service is provided throughout the majority of the service area between approximately 5:00 a.m. and 11:00 p.m. on weekdays. The service day is shorter on Saturdays, Sundays and holidays.  ADA paratransit reservations hours are 8:00 a.m. to 5:00 p.m. daily, including holidays	Meets ADA Requirements
Geographical area of service 37.131(a)(i,ii,iii,iv) and (3)	Within ¾ mile of fixed	RT's ADA paratransit service area is designed to be "comparable" to RT's fixed-route bus and light rail service, providing ADA paratransit service to origins and destinations within a ¾ mile radius of RT's bus routes or light rail stations during regular service hours.	Meets ADA Requirements
Advance reservation time 37.131(b)(1)(3)(4)	Day before to 14 days in advance	Ride requests may be made (1) one to (2) two days in advance.  Same-day emergency service is not provided.	Meets ADA Requirements
Trip request window 37.131(b)(2)	1 hour on either side	The reservationist will "negotiate the trip" by searching for available space up to one hour on either side of the pick-up time of the customer's request.	Meets ADA Requirements
Trip denials/capacity constraints/service availability 37.131(f)(1)(2)(3)(A) (B)(C)(ii)	Not allowed		
Fares 37.131(c)(1)(2)(3)(4)	Twice fixed-route fare	Each one-way trip is \$5.00. (Twice fixed-route fare)  RT provides fully accessible fixed-route transit service in the greater Sacramento region. RT encourages seniors and individuals with disabilities to take advantage of the independence and flexibility that is provided by its bus and light rail train system at a reduced fare.	
Restrictions or priorities based on trip purpose 37.131(d)	Not allowed		
Level of service 37.129 (a)	Curb-to curb or Door-to-door	RT ADA paratransit service is door-to-door, shared-ride transportation.  ADA paratransit service is provided using a variety of vehicles, including taxis. RT's ADA paratransit provider reserves the right to determine whether ADA paratransit services will be delivered using its own operators and vehicles, or using operators and vehicles of other entities (for example, taxis). Customers must ride in the vehicle that is sent for them. Special requests for specific vehicles and vehicle operators cannot be honored. If the customers pick-up and/or drop-off location is not accessible, the ADA paratransit service will need to be provided from curb-to-curb.	Meets ADA Requirements

ADA Requirement	ADA Minimal Requirement/Policy	Sacramento Service Level	Sacramento
<p>Subscription service 37.133 (a)(b)(c)</p>	<p>No more than 50% of total service if demand is not met; no restriction if demand is met</p>	<p>Subscription Service Subscription service is limited to passengers for trips that recur weekly to the same place at the same time. RT offers ADA paratransit subscription service on a spaceavailable basis, and may prioritize service as needed.</p> <p>Subscription service will be cancelled for any customer who is suspended under RT's No-Show policy.</p> <p>Suspended subscription service customers must reapply to be considered for a new subscription. The subscription service application will not be considered until four (4) months after the end of the suspension period.</p>	<p>Meets ADA Requirements</p>
<p>Trip by trip/conditional eligibility 37.129 (b) 37.123(e)(3)(i)(ii)</p>	<p>Encouraged-Pt. 37.App.D Section 37.123 ADA Paratransit Eligibility Standards: Trip-by-Trip Eligibility</p>	<p>Conditional Eligibility enforced: Conditional –Customer prevented from using the fixed-route bus or light rail at times when certain disabling or extreme environmental or architectural barriers exist.</p> <p>Paratransit, Inc. service is available to you at these times only.</p> <p>RT does limit services to conditionally eligible persons on a trip-by-trip basis.</p>	<p>Meets ADA Requirements</p>
<p>No shows 37.125 (h)</p>	<p>Allows penalties, including suspension of service for repeated no-shows.-Pt. 37.App.D Section 37.125 ADA Paratransit Eligibility Process</p>	<p>Suspension for Excessive Missed Trips, No-Shows and Lateness</p> <p>Excessive missed trips are considered excessive when an individual reserves seven (7) or more trips within any month and no-shows and/or late cancels 40 percent or more of those scheduled trips. This will be considered a pattern or practice of missed trips and a violation of our No-Show/Late Cancellation policy.</p> <p>A no-show occurs when the vehicle operator arrives at the pick-up location within the 30-minute pick-up window, waits the required five (5) minutes and the customer does not board the vehicle.</p> <p>A late cancellation occurs when a customer cancels a trip less than two (2) hours before the scheduled trip.</p> <p>Customers incurring excessive missed trips may be suspended for a reasonable period.</p> <p>Repeated violations of RT's No-Show Policy will result in longer suspension periods each time.</p>	<p>Meets ADA Requirements</p>

Sources: 49 CFR Subtitle A, Part 37 – Transportation Services for Individuals With Disabilities (ADA), Oahu Transit Services, Office of the City Auditor, and various city paratransit websites

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# Appendix E

## Handi-Van Reservations Refusal Process

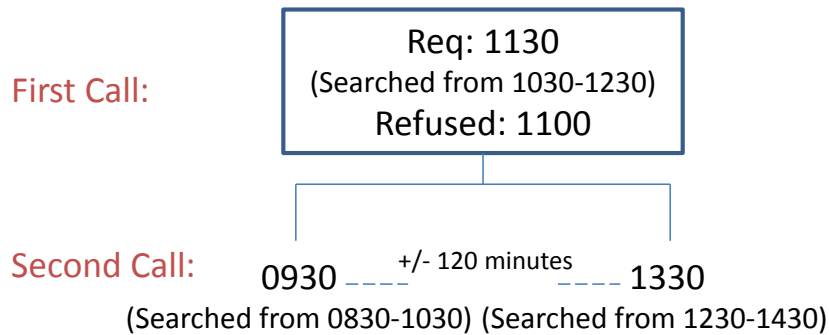
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### Refusal Process

– Before every Reservation, check to see if this customer already has an existing ‘REF’, or Scheduled Trip. An example is below.

- At the First Call, customer requested an 1130 pickup. The search window looked for a time available +/- 60 minutes. They were offered an 1100. Customer decides to Refuse (REF) the 1100.



- At the Second Call, Reservations would need to search 2 hours up or down of the original requested time. For this example, the time they would search is either a **0930**, or a **1330**.

Source: Oahu Transit Services

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# Appendix F

## Eligibility Determinations, Customer Complaints, and Procurement

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Resolution 14-69, FD1 requested a review of three operational areas that we found were operating sufficiently. These areas included: eligibility determinations, customer complaint handling, and procurement of Handi-Van vehicles. We had no findings in these three areas.

### **Eligibility Determinations**

We found the Handi-Van eligibility process is generally consistent with ADA requirements and industry best practices. Eligibility determinations generally comply with the 21-day notification requirement.

*Innovative Paradigms.* The city's Department of Transportation Services has a contract with Innovative Paradigms to provide eligibility determinations. This contract was in effect from July 2009 to July 2015 at a cost of a little over \$1 million per year, or \$6.1 million over the last six years. The Innovative Paradigms eligibility determinations for the last three fiscal years are shown in Exhibit F.1.

**Exhibit F.1**  
**Innovative Paradigms Eligibility Determinations (FY2013 to FY 2015)**

	<i>Operating Year</i>		
	<i>Aug 12 to Jul 13</i>	<i>Aug 13 to Jul 14</i>	<i>Aug 14 to Jul 15</i>
Total Interviews (New and Recertifications) Conducted	4,461	4,505	3,946
Total Functional Assessments Conducted	4,253	4,131	2,970
Total In-Person Determinations Conducted	4,437	4,478	3,866
Total Other Determinations*	1,169	1,494	1,696
<b>TOTAL ALL DETERMINATIONS</b>	<b>5,606</b>	<b>5,972</b>	<b>5,562</b>
<i>In-Person Determination Outcomes</i>			
Conditional	554	426	295
Unconditional	3,362	3,496	2,992
Temporary Conditional	32	43	0
Temporary Unconditional	287	388	486
Not Eligible	202	125	93
TOTAL	4,437	4,478	3,866
Ratio determined not eligible	4.6%	2.8%	2.4%

\* Other determinations include applications from out-of-state visitors, temporary eligibility (medical reason), and updating client list based on clients who have passed away.

Source: Department of Transportation Services

In our opinion, the city's paratransit eligibility determination process generally met applicable ADA, city, and industry best practice requirements. For example, the eligibility process meets 24 best practices as identified by the Disability Rights Education and Defense Fund. We concluded the eligibility process is effective and generally ensures that only qualified applicants are approved for paratransit service.

*Eligibility process.* Exhibit F.2 shows that Innovative Paradigms complied with all six contract deliverables and the deliverables satisfied ADA requirements and/or city ordinances, rules, policies and procedures.

**Exhibit F.2****Eligibility Determination Compliance with ADA and City Requirements**

	<b>Innovative Paradigms Contract Requirements</b>	<b>Applicable City Ordinance, Rule, Policy, or Procedure</b>	<b>Applicable ADA Requirement</b>	<b>Does the Contract Term Align?</b>
1	<b>Conduct In-Person Assessments.</b> IP will begin in-person assessments with face-to-face interaction between a skilled eligibility specialist and the client. Applicants and applicable caregivers will travel to the office and complete the intake documentation.	<b>Administrative Rule §23-5-11:</b> Persons desiring eligibility to use the special transit service must first be determined eligible by the city's authorized paratransit certification entity after completing the city's establishes ADA paratransit in-person assessment eligibility process.	None	Yes, IP conducts in-person eligibility determinations.
2	<b>Provide Written Determinations.</b> Most determinations will be completed during the initial visit. A written verification will follow for internal notification purposes within one to two business days.	<b>Administrative Rule §23-5-11:</b> The authorized paratransit certification entity staff will make a determination of the eligibility of each applicant and notify them of this determination in writing.	None	Yes, IP sends a written verification notice.
3	<b>Identify and Train Qualified Applicants to Use Fixed Route Transit.</b> Eligibility specialists will be able to observe applicants with an eye to identifying their ability to use various modes of transportation.	None.	None	Yes, IP provides Travel Training.
4	<b>Provide Documentation of Eligibility Determinations.</b> The firm will offer a range of recommended formats and reporting details from which customized formats can be developed.	<b>DTS Policy 7-4.7 (Paratransit Operations):</b> Minimally required information is included in the client registration database to allow applicant to travel to and from the in-person assessor offices; After receiving the completed in-person assessment, the Eligibility Determination Form is completed using the assessment results.	None	Yes, IP maintains applicant information as needed.
5	<b>Utilize Trapeze to Monitor Trends and Volumes.</b> IP expects to use the city-licensed version of the Trapeze Cert Module to manage client records.	None	None	Yes, IP transmits and monitors data in Trapeze
6	<b>Provide written determinations (21 day) –</b> The firm expects to make most determinations at the time of the initial contact, which will bring the determination early in the 21-day window provided for in the ADA regulations.	<b>DTS Policy 7-4.7 (Paratransit Operations):</b> Applications requiring in-person assessment shall be completely processed, including final determination letters, etc., within 21 working days.	Applicants are to be granted presumptive eligibility if a determination of eligibility has not been made within 21 calendar days of the submission of a completed application. Service must be provided, and the applicant presumed to be eligible, until and unless the determination is complete and the person is found to be ineligible.	Yes, IP generally processes applications within 21 days from FY13 to FY15, with exceptions noted

Source: Department of Transportation Services, Revised Ordinances of Honolulu, and Office of the City Auditor

**Best practices.** We reviewed 24 eligibility determination best practices as identified by the Disability Rights & Education Defense Fund. Our assessment found that Innovative Paradigms' eligibility process generally complied with all 24 best practices. Those practices included: develop and use a comprehensive task/skills list; identify specific abilities and/or limitations; and do not limit eligibility based on trip purpose. Other practices included do not steer applicants away from ADA paratransit, and no fee imposed for eligibility determinations.

**Sample results.** We observed three eligibility determinations conducted by Innovative Paradigms staff and compared the process with applicable policies and procedures. We found that all three determinations were thorough and aligned with applicable policies and procedures. The staff was professional and considerate.

**Notifications.** According to the city's contract with Innovative Paradigms, the agency must send a determination notification to the applicant within 20 days of the assessment (total of 21 days including the interview). If a determination is not rendered, the applicant is presumed eligible. We reviewed eligibility determination notifications data for FY 2014 and FY 2015 to assess compliance with the 21-day notification requirement.

We found that Innovative Paradigms exceeded the 21-day eligibility determination notification requirements 10 times in FY 2014 (out of 5,972 total determinations) and 14 times in FY 2015 (out of 5,562 total determinations). In both years, the number of determination notifications that exceeded 21 days was less than one percent.

We concluded that the city's paratransit eligibility determination process is generally effective in determining Handi-Van eligibility. The process complies with applicable policies, procedures, rules, and guidelines.

## **Customer Complaints**

Customer complaints increased 51% from FY 2014 to FY 2015, but are within performance benchmarks.

**Complaint performance standard.** The Short Range Transit Operations Plan of May 2012, recommended that OTS track and report customer complaint data and establish a performance benchmark. The plan suggested a benchmark of 15 complaints per 100,000 trips as satisfactory. OTS established a performance benchmark of 2.15 complaints per 1,000 trips<sup>1</sup>.

Over the last three fiscal years, OTS averaged 1.34 complaints per 1,000 monthly trips, which is well below the 2.15 benchmark. Exhibit F.3 shows the ratio of paratransit customer complaints from FY 2013 to FY 2015.

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<sup>1</sup>Prior to July 2014, OTS reported the number of complaints per 100,000 trips, but did not establish a benchmark. Starting July 2014, OTS amended its reporting data to complaints per 1,000 trips and a benchmark of 2.15 complaints per 1,000 trips.

**Exhibit F.3**  
**Complaint Ratio per 1,000 Trips (FY 2013 to FY 2015)**

	<b>FY 2013</b>	<b>FY 2014</b>	<b>FY 2015</b>	<b>TOTAL</b>
Total Complaints	1,518	1,164	1,759	4,441
Total Trips	1,114,307	1,124,467	1,068,634	3,307,408
Total trips (by 1K)	1,114	1,124	1,069	1,102
Complaints per 1K	1.36	1.04	1.65	1.34
Max # complaints (.15 per 1,000 trips)	1.67	1.69	1.60	1.65

Source: OCA calculation based on OTS data

When converted, OTS met the suggested benchmark in FY 2013 and FY 2014, and exceeded the benchmark in FY 2015.

**OTS adequately handles customer complaints.** OTS is generally responsive to customer complaints. Customer complaints jumped 50% from FY 2014 (1,164) to FY 2015 (1,759), but are within the performance standards. We found that the complaints are generally addressed within the 30-day close-out guideline established by OTS. More specifically,

- We reviewed a sample of 25 paratransit customer complaints between FY 2013 and FY 2015 to determine whether OTS closed-out customer complaints within 30 days, which is OTS' operating policy. We found that 24 of 25 complaints were closed-out within 30 days. The average in our sample was 13 days. The lone complaint that exceeded the 30-day standard took 35 days.
- Although formal responses to customer complaints is not required, OTS responded to 19 complainants (76%) either through a phone call, letter, email, or otherwise documented the complaint. According to an OTS customer service administrator, the agency will respond to complainants if a formal response is requested or OTS deems it necessary.

Based on our review, OTS addresses and responds to customer complaints in a timely manner. OTS, however, does not have formal, written policies and procedures for handling customer complaints, including the 30-day complaint close-out requirements. OTS may need to formalize its paratransit customer complaint procedures to ensure consistency and continuity in handling customer complaints. Exhibit F.4 details the number and category of customer complaints.

#### Exhibit F.4 Paratransit Customer Complaints (FY 2013 to FY 2015)

	<i>Number of Complaints</i>			
	<i>FY 2013</i>	<i>FY 2014</i>	<i>FY 2015</i>	<i>TOTAL</i>
<b>Schedule Problems</b> (route is always late, scheduling problems not attributed to bus operators)	4	16	2	22
<b>Poor Driver Attitude</b> (general rude behavior, failed to answer questions, fail to assist customers)	236	181	155	572
<b>Harrassment of Passengers/Others by OTS Employee</b> (Assault/physical contact, verbal/sexual harrassment)	8	7	9	24
<b>Unsafe Vehicle Operations</b> (speeding, abrupts starts/stops, unsafe merging, inappropriate cell use)	114	94	90	298
<b>Route and Schedule Issues</b> (driver is always early/late, driver went off-route/didn't know route, service delay)	58	79	61	198
<b>Policy Violations</b> (Radio too loud, harrassment by other passengers, unnecessary talking with customers, fares)	44	27	16	87
<b>Individuals with Disabilities Requirements</b> (security of mobility devices, passing up person with disability, ADA)	6	6	6	18
<b>Bus Stops</b> (bus stop hazards/repairs needed)	0	0	1	1
<b>Equipment Maintenance</b> (Inoperable lifts, dirty vehicles, airconditioning too warm/cold, missing equipment)	22	13	11	46
<b>Non-Operator Staff</b> (Dispatch/Reservations staff, busy phones, reservation error, phone ettiquette)	308	163	486	957
<b>General Transit Policy Complaints</b> (routes and schedules and assignment of buses)	3	3	1	7
<b>Unique to Paratransit Services</b> (Late pick ups, driver no show, wrong pick-up/drop-off location, eligibility, taxis)	715	575	921	2,211
<b>Total Complaints</b>	<b>1,518</b>	<b>1,164</b>	<b>1,759</b>	<b>4,441</b>
% change from prior year	---	-23%	51%	---

#### Categories With Significant Year-Over-Year Change

	<i>Number of Commendations/Complaints</i>			
	<i>FY 2013</i>	<i>FY 2014</i>	<i>FY 2015</i>	<i>TOTAL</i>
<b>Non-Operator Staff</b> (Dispatch/Reservations staff, busy phones, reservation error, phone ettiquette)	308	163	486	957
% change from prior year	---	-47%	198%	---

	<i>Number of Commendations/Complaints</i>			
	<i>FY 2013</i>	<i>FY 2014</i>	<i>FY 2015</i>	<i>TOTAL</i>
<b>Unique to Paratransit Services</b> (Late pick ups, driver no show, wrong pick-up/drop-off location, eligibility, taxis)	715	575	921	2,211
% change from prior year	---	-20%	60%	---

Source: Oahu Transit Services



In FY 2015, the most common complaints were late pick-up, busy phones, and taxi service. Route infraction and dispatch/reservation staff were also common. Exhibit F.5 shows the five most common Handi-Van complaints for FY 2013 to FY 2015.

### Exhibit F.5 Top Five Complaints (FY 2015)

<b><i>FY 2013 - Top 5 Complaints</i></b>	
Late pick-up	314
Taxi - general complaint	138
Reservation error	130
Failure to properly assist customer	94
Paratransit Dispatch/Reservations staff	76

<b><i>FY 2014 - Top 5 Complaints</i></b>	
Late pick-up	282
Taxi - general complaint	119
Reservation error	75
Failure to properly assist customer	71
No show	49

<b><i>FY 2015 - Top 5 Complaints</i></b>	
Late pick-up	519
Busy phones	232
Taxi - general complaint	133
Route infraction	93
Paratransit Dispatch/Reservations staff	90

Source: Oahu Transit Services

### Handi-Van Procurement Process

We found the city used a procurement process to purchase Handi-Vans that withstood a legal challenge and was found to be consistent with state law and federal guidelines.

**Legal challenge.** DTS procurement of Handi-Van vehicles in 2012 was challenged by a local vendor who claimed that the agency violated state procurement laws. The department's procurement procedures were upheld by state regulators and the First Circuit Court. However, the court challenges resulted in delayed delivery of Handi-Van vehicles.

On September 19, 2012, DTS issued a *Request for Bid* (RFB-DTS-547510) for 99 paratransit vehicles. This RFB contained two important conditions: (1) the city shall comply with all applicable FTA requirements for FTA-funded procurement; and (2) should there be any conflict between the

requirements of city policies and procedures, Hawaii Administrative Rule, and Hawaii Revised Statutes, the FTA requirements shall govern.

On September 24, 2012, one of the local bidders filed a formal protest to the RFB requirements related to bidder eligibility. According to DTS, this bidder sought to have the city apply state law, which requires that qualified equipment bidders must have a show room or other physical presence in the state. The state law was designed to protect local vendors whenever possible. Since the Handi-Vans were to be purchased using federal FTA funds, the federal competitive bid requirements superseded the state law. The RFB therefore allowed out-of-state bidders to compete for the contract as allowed under the FTA guidelines.

The local bidder objected to the bid procedure and claimed that the RFB violated state procurement laws. A series of legal challenges ensued. The Intermediate Court of Appeals ultimately affirmed the city's procurement process for Handi-Van vehicles:

- On November 30, 2012, the city prevailed at the Department of Commerce and Consumer Affairs' (DCCA) Office of Administrative Hearing where a Hearings Officer's *Findings of Fact, Conclusions of Law and Decision* ruled in favor of the city.
- On January 4, 2013, the First Circuit Court heard the local bidder's appeal of the DCCA findings and issued an order affirming the DCCA hearings officer's finding of fact.
- On November 18, 2013, the Intermediate Court of Appeals affirmed both the DCCA's findings and the First Circuit Court's ruling.

Despite the court decision, the contract for the 99 vehicles was awarded to the local bidder that protested the initial RFB results. The contract amount was \$10,700,019 and was awarded to the same bidder that supplied the city with Handi-Van vehicles in the past.

***Delayed Handi-Van deliveries.*** As a result of the RFB's legal challenges, delivery of the 99 Handi-Vans was delayed by over a year. As a result, OTS was unable to remove older vehicles from the fleet that had reached its useful life and continued to operate vehicles with significant maintenance and safety issues.

# Appendix G

## Resolution 14-69, FD1



**CITY COUNCIL**  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII

No. 14-69, FD1

### RESOLUTION

REQUESTING THE CITY AUDITOR TO PERFORM A COMPREHENSIVE MANAGEMENT AND PERFORMANCE AUDIT OF THE CITY'S PARATRANSIT SERVICE.

WHEREAS, TheHandi-Van is a public transit service for persons with disabilities who are unable to use TheBus; and

WHEREAS, under the Americans with Disabilities Act of 1990 ("ADA"), TheHandi-Van cannot have any capacity constraints, meaning that trip requests for eligible persons cannot be prioritized, limited or denied; and

WHEREAS, the Department of Transportation Services ("DTS") oversees the management and operation of TheHandi-Van through a contract with Oahu Transit Services, Inc. ("OTS"), a private management company that also operates TheBus; and

WHEREAS, the August 2010 Short Range Transit Plan Existing Conditions Report ("2010 Report") identified several problems and concerns affecting TheHandi-Van's operations and performance, including:

- The size, age and composition of TheHandi-Van fleet;
- The number of vehicles unavailable for service due to maintenance needs;
- Use and effectiveness of scheduling and dispatch technologies (including the Trapeze scheduling software);
- The supplemental use of taxicabs to meet the ADA's zero denial requirement;
- Late pick-up and drop-off of clients, especially those who have scheduled essential medical appointments, such as chemotherapy or dialysis;
- The volume of pre-arranged subscription rides, which reduce capacity to handle demand trip requests;
- Client eligibility assessment center operations and policies;
- Client information request and complaint follow-up procedures;
- DTS oversight of OTS paratransit operations and the establishment and monitoring of performance standards;



**CITY COUNCIL**  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII

No. 14-69, FD1

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## RESOLUTION

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and

WHEREAS, while both DTS and OTS have initiated actions to address many of the concerns identified in the 2010 Report, the client-based organization known as Citizens for a Fair ADA Ride ("CFADAR"), which held quarterly meetings for the past several years to discuss first-hand observations and issues relating to TheHandi-Van, continues to have concerns and complaints regarding the overall performance and operations of TheHandi-Van; and

WHEREAS, the May 2012 DTS Short Range Transit Operations Plan ("2012 Plan"), while acknowledging that some of TheHandi-Van's service policies and procedures exceed minimum standards set forth by the ADA, and that several identified problem areas have been addressed in recent years, still found that operating costs and service productivities are emerging operational issues, and that TheHandi-Van service still faces several other challenges that demand management attention; and

WHEREAS, the 2012 Plan identified the following strategies intended to improve the operating efficiency and quality of TheHandi-Van:

- Revise scheduling procedures;
- Establish a demand management program;
- Monitor use of taxis or other subcontractors;
- Monitor time on vehicle;
- Manage TheHandi-Van fleet;
- Establish a customer satisfaction/service quality program;

and

WHEREAS, in light of continuing concerns and recent findings, the Council deems it appropriate and timely that an audit of TheHandi-Van be conducted to address the many issues that have arisen and continued over the years, and to assess the City's ability to meet future paratransit challenges and demands in compliance with Federal ADA regulations; and



**CITY COUNCIL**  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII

No. 14-69, FD1

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## RESOLUTION

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WHEREAS, the City Auditor's current annual work plan includes a self-initiated audit of TheHandi-Van, however such an audit has not yet commenced; now, therefore,

BE IT RESOLVED by the Council of the City and County of Honolulu that the City Auditor is requested to perform a comprehensive management and performance audit of TheHandi-Van; and

BE IT FURTHER RESOLVED that the Council requests the City Auditor to report its findings and recommendations on concerns and issues identified in the 2010 Report and 2012 Plan, as well as those raised and discussed by CFADAR; and

BE IT FURTHER RESOLVED that, in addition to these concerns and issues, the Council also requests that the City Auditor investigate and report on TheHandi-Van system's procurement process in light of the problems and concerns regarding the size, age and composition of TheHandi-Van fleet, as well as the number of vehicles unavailable for service due to maintenance needs raised in the 2010 Report; and



**CITY COUNCIL**  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII

No. 14-69, FD1

**RESOLUTION**

BE IT FINALLY RESOLVED that copies of this Resolution be sent to the Mayor, the Managing Director, the Director of Transportation Services, the President and General Manager of Oahu Transit Services, Inc., and the City Auditor.

INTRODUCED BY:

Breene Harimoto

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DATE OF INTRODUCTION:

April 8, 2014  
Honolulu, Hawaii

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Councilmembers

CITY COUNCIL  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII  
CERTIFICATE

**RESOLUTION 14-69, FD1**

Introduced: 04/08/14 By: BREENE HARIMOTO

Committee: TRANSPORTATION

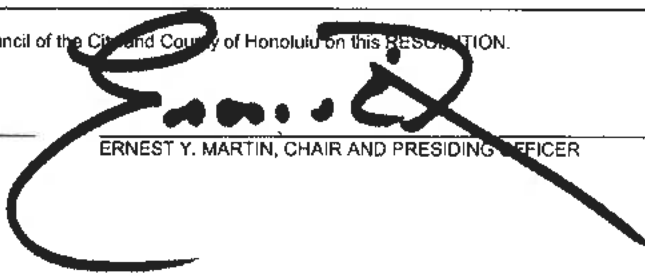
Title: RESOLUTION REQUESTING THE CITY AUDITOR TO PERFORM A COMPREHENSIVE MANAGEMENT AND PERFORMANCE AUDIT OF THE CITY'S PARATRANSIT SERVICE.

Voting Legend: \* = Aye w/Reservations

04/24/14	TRANSPORTATION	CR-134 - RESOLUTION REPORTED OUT OF COMMITTEE FOR ADOPTION.
05/07/14	COUNCIL	RESOLUTION AMENDED TO FD1. 9 AYES: ANDERSON, CHANG, FUKUNAGA, HARIMOTO, KOBAYASHI, MANAHAN, MARTIN, MENOR, PINE. CR-134 AND RESOLUTION 14-69, FD1 WERE ADOPTED. 9 AYES: ANDERSON, CHANG, FUKUNAGA, HARIMOTO, KOBAYASHI, MANAHAN, MARTIN, MENOR, PINE.

I hereby certify that the above is a true record of action by the Council of the City and County of Honolulu on this RESOLUTION.

  
BERNICE K. N. MAU, CITY CLERK

  
ERNEST Y. MARTIN, CHAIR AND PRESIDING OFFICER

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