

## Regional Transportation District

*Our mission:*

*To meet our constituents' present and future public transit needs by offering safe, clean, reliable, courteous, accessible and cost-effective service throughout the District.*



**To:** RTD Board of Directors

**Through:** Bruce Abel, Assistant General Manager, Bus Operations

**From:** Carolyn Conover, Sr. Manager, Contracted Services  
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**Date:** January 15, 2016

**Subject:** Analysis of Securement Area Issues Data  
January through December 2015

As you are aware, RTD and the Colorado Cross Disability Association (CCDC) entered into a joint Settlement Agreement in March of 2014 in an effort to resolve issues related to availability of the securement area on board RTD buses for passengers who use mobility aids. One of the requirements of the Settlement Agreement was for RTD to adopt a policy to ensure individuals who use mobility aids, including wheelchairs, have access to its buses and to the securement area. The key components of the Policy are as follows:

- Large items cannot block the aisle of the bus
- Large items must be collapsed prior to boarding, and non-disabled passengers must use the seats behind the securement area for themselves and their items
- If large items cannot be collapsed and stored behind the securement area, non-disabled passengers will not be allowed to board the bus with those items
- Large items must be readily moveable and stowed behind the securement area
- Passengers with mobility aids, such as wheelchairs, will be given priority boarding at bus stops

Starting with the effective date of the Policy (March 22, 2014), RTD has been tracking 1) each incident in which a bus operator reported passing up a passenger using a mobility aid and 2) each incident in which a passenger complained that an operator had not followed the Policy. In accordance with one of the reporting requirements of the Settlement Agreement, RTD is to present a report summarizing the data noted above on an annual basis to the Board of Directors and to the CCDC. The report is also shared with the Denver Regional Mobility Access Council (DRMAC) for posting on the DRMAC website and it is also posted on the RTD website. This report provides a summary of the securement area issues data for the period of January through December of 2015.

The data collected for this report is generated in three ways – 1) the operator presses a pre-programmed message button (“ADA PAX PASS-UP”) on the CAD/AVL radio system,

2) the operator makes radio contact with RTD Dispatch using another button on the CAD/AVL radio system, or 3) a customer files a report with the RTD Customer Care Division. Each incident generated by the above means is investigated and tracked. The investigation includes a review of video from the bus (if available), a review of the audio file documenting the conversation between the operator and the dispatcher, and a report from the operator which includes a copy of the "ADA PAX PASS-UP" form given to the passenger. Based on the results of the investigation, the securement area incident is assigned a code as follows:

DUP	Duplicate – this indicates that the operator pressed the "ADA PAX PASS-UP" button multiple times for the same incident
NPI	Not a Pass Up Incident – this indicates that one of the following occurred <ul style="list-style-type: none"><li>• The passenger was accommodated on this bus</li><li>• The passenger boarded the following bus which was right behind this bus (no wait time)</li><li>• The passenger left the area</li><li>• The operator pressed the button in error</li><li>• The operator was asking a question about the policy or procedure</li></ul>
LIFT	Lift Inoperable – this indicates that the lift or ramp on the bus was not functioning as required
2 W/C	2 Wheelchairs – this indicates that 2 passengers in wheelchairs were already occupying the securement area
W/C + OMA	Wheelchair and Other Mobility Aid – this indicates that one passenger in a wheelchair and a passenger using another mobility aid were already occupying the securement area
2 OMA	2 Other Mobility Aids – this indicates that 2 passengers using other mobility aids were already occupying the securement area
PXO	Passenger Overload – this indicates the bus was standing room only and no one was willing or able to move to make room
OTHER	These incidents include things like two passengers in wheelchairs want to travel together but there is already one passenger in a wheelchair in the securement area or the flip seat will not flip up
CSR	Customer Service Report – this indicates a customer contacted RTD Customer Care to report an issue related to the Policy
PENDING	The investigation into the incident is still in process
NO DATA	There was insufficient data available to verify that a passenger in a wheelchair or other mobility aid was passed up

For the period of January through December of 2015, the breakdown of incidents is as follows:

- 1116 Total incidents recorded
- 65 Duplicate entries
- 167 Not a "pass up" incident
  - 49 passenger was accommodated after button had been pressed
  - 7 passenger boarded the following bus with no wait time
  - 8 operator had a question regarding the Policy or the procedure to follow
  - 100 operator pressed the "ADA PAX PASS-UP" button in error
  - 3 passenger left area before operator could share information
- 26 Customer contacted RTD Customer Care with concerns regarding the Policy:
  - 6 operator did not board passenger with disability first
  - 5 operator allowed non-disabled passengers to store personal items in securement area
  - 5 passenger boarded with unfolded stroller (most claimed they were disabled or their child was disabled)
  - 4 heavy passenger loads – passenger with mobility aid unable to board
  - 2 operator did not complete "ADA PAX PASS UP" form or attempt to make room for passenger with disability
  - 2 passenger claimed pass up – video evidence did not show a pass up
  - 1 complaint about a passenger with a walker in the securement area
  - 1 operator unable to raise the seats in the securement area

Each customer contact above was investigated and operators were addressed as needed. In those cases where it was determined the operator did not follow procedures, the operator was disciplined and/or retrained.

- 858 Actual Pass Up incidents
  - 591 2 passengers in wheelchairs already occupying the securement area
  - 80 1 passenger in a wheelchair and 1 passenger w/other mobility aid already in the securement area
  - 37 2 passengers w/other mobility aid already in the securement area
  - 26 passenger overload (usually standing room only on the bus) – not specifically noted if securement area taken by passengers w/mobility aids
  - 84 lift inoperable
  - 40 Other
    - majority of these incidents indicated 2 passengers in wheelchairs wanted to ride together and there was already one passenger in a wheelchair or with another mobility aid on the bus
  - 0 Investigation pending
  - 0 No data available

The 858 pass-up incidents equate to an average of 71.5 incidents per month. Of the 858 pass-up incidents, 708 (83%) were due to the securement area being full with passengers using mobility devices.

For the period of March through December 2014, RTD operators reported 605 pass-up incidents, an average of 60.5 per month. Of the 605 pass-up incidents, 474 (78%) were due to the securement area being full with passengers using mobility devices.

RTD does not currently track ridership by passengers that use mobility aids. However, a comparison of the securement area data from May through December 2014 and January through December 2015 showed the following:

In 2014 there were 10 incidents recorded where a passenger with a mobility device was not able to board because a passenger with an unfolded stroller or grocery cart was in the securement area. In 2015 there were only 6 incidents, and in 5 of those incidents the passenger with the stroller either claimed they had a disability or their child had a disability.

In 2014 there were 7 incidents recorded where a passenger was allowed to lift the seats in the securement area to store personal items. In 2015 there were only 5 incidents. In all incidents, the operators were addressed by management and retrained on the requirements of the Policy.

As noted above, RTD recorded 84 "lift inoperable" incidents in 2015. The data shows that for all of the "lift inoperable" incidents, the passenger either boarded the following bus or another bus was dispatched to accommodate the passenger. The majority of passengers were accommodated within 0 to 10 minutes.

RTD and the private contractors continue to require operators to cycle the wheelchair lift or ramp at pull-out to ensure the equipment is working properly. Whenever a lift or ramp is reported as not working, a trade bus is dispatched as soon as possible and the bus with the inoperable equipment is returned to the garage where the maintenance department completes a diagnostic check and necessary repairs. Over half of the lift/ramp issues reported in 2015 were on the 2000 series Orion buses, which are currently being replaced with low-floor ramp equipped buses.

Of the 858 pass up incidents in 2015, RTD received a completed "ADA PAX PASS UP" form from the operator for 78% of the incidents. For the period of May through December of 2014, RTD received a completed "ADA PAX PASS UP" form for only 64% of the incidents.

Some of the reasons provided by operators for not completing or turning in the "ADA PAX PASS UP" form are as follows:

- Passenger boarded the following bus which was right behind the other bus (passenger did not have to wait)
- Passenger advised operator he/she did not want the form
- Operator forgot to turn in the form

To ensure that operators understand the importance of completing the "ADA PAX PASS UP" form, every operator is required to meet with management for each incident where a form is not completed or turned in, and the operator is addressed as needed. For the private contractors, RTD issues Liquidated Damages if the "ADA PAX PASS UP" form is not provided to RTD.

One additional statistic RTD tracked was the number of times an operator pressed the lower priority "Request To Talk" (RTT) button in order to contact Dispatch regarding a passenger pass up instead of the high priority "ADA PAX PASS-UP" button. During the reporting period of January through December 2015, operators used the RTT button 188 times (22%). For the period of May through December of 2014, operators used the RTT button 59 times (12%).

For each of the incidents where the operator failed to use the higher priority "ADA PAX PASS-UP" button the operator was addressed by management regarding the proper procedures.

The routes generating 20 or more pass-up incidents for the period of January through December, 2015, were as follows:

- Route 0 – 84 incidents (9.8% of total)
- Route 3 – 21 incidents (2.4% of total)
- Route 15 – 89 incidents (10.4% of total)
- Route 15L – 45 incidents (5.2% of total)
- Route 16 – 64 incidents (7.5% of total)
- Route 20 – 22 incidents (2.6% of total)
- Route 31 – 41 incidents (4.8% of total)
- Route 38 – 24 incidents (2.8% of total)
- Route 48 – 168 incidents (19.6% of total)
- Route 52 – 39 incidents (4.5% of total)
- Route 76 – 20 incidents (2.3% of total)
- Route 105 – 28 incidents (3.3% of total)

As noted above, the Route 48 experienced a high number of pass up incidents. RTD staff discovered a homeless shelter near 29<sup>th</sup> and Brighton was experiencing overcrowding due to another shelter in the area being closed. Many of the individuals at this shelter use mobility aids and all individuals leave the shelter at the same time each morning. This was causing passenger overloads on the Route 48. RTD immediately assigned additional resources to assist with service on this Route and now keeps additional resources on stand-by to assist when needed.

RTD and the private contractors provided ADA refresher training for all operators in 2014 and 2015. Additional ADA refresher training will be given to all operators in 2016. The curriculum for the past and future ADA refresher training is shared with members of the Colorado Cross Disability Coalition for input and approval. This training continues to reinforce RTD policies and procedures regarding accommodating passengers with

disabilities on RTD buses. It also serves to raise operators' awareness of the needs of passengers with a variety of disabilities and mobility challenges.

It appears from many of the incident comments that operators and passengers, as well, are making an effort to ensure that passengers using mobility aids are accommodated on RTD buses. RTD management staff will continue to address operators individually when it is verified that they did not follow the Policy. In addition, annual refresher training and periodic Transportation Bulletins will help reinforce the requirements and expected compliance with the Policy for all operators.