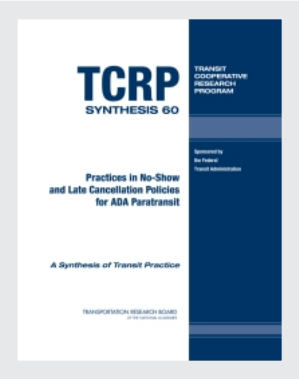

Practices in No-Show and Late Cancellation Policies for ADA Paratransit

DETAILS

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TRANSIT COOPERATIVE RESEARCH PROGRAM

TCRP SYNTHESIS 60

Practices in No-Show and Late Cancellation Policies for ADA Paratransit

A Synthesis of Transit Practice

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SUBJECT AREAS
Public Transit

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TRANSPORTATION RESEARCH BOARD

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The nation's growth and the need to meet mobility, environmental, and energy objectives place demands on public transit systems. Current systems, some of which are old and in need of upgrading, must expand service area, increase service frequency, and improve efficiency to serve these demands. Research is necessary to solve operating problems, to adapt appropriate new technologies from other industries, and to introduce innovations into the transit industry. The Transit Cooperative Research Program (TCRP) serves as one of the principal means by which the transit industry can develop innovative near-term solutions to meet demands placed on it.

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FOREWORD

By Staff
Transportation
Research Board

Transit administrators, engineers, and researchers often face problems for which information already exists, either in documented form or as undocumented experience and practice. This information may be fragmented, scattered, and unevaluated. As a consequence, full knowledge of what has been learned about a problem may not be brought to bear on its solution. Costly research findings may go unused, valuable experience may be overlooked, and due consideration may not be given to recommended practices for solving or alleviating the problem.

There is information on nearly every subject of concern to the transit industry. Much of it derives from research or from the work of practitioners faced with problems in their day-to-day work. To provide a systematic means for assembling and evaluating such useful information and to make it available to the entire transit community, the Transit Cooperative Research Program Oversight and Project Selection (TOPS) Committee authorized the Transportation Research Board to undertake a continuing study. This study, TCRP Project J-7, "Synthesis of Information Related to Transit Problems," searches out and synthesizes useful knowledge from all available sources and prepares concise, documented reports on specific topics. Reports from this endeavor constitute a TCRP report series, *Synthesis of Transit Practice*.

This synthesis series reports on current knowledge and practice, in a compact format, without the detailed directions usually found in handbooks or design manuals. Each report in the series provides a compendium of the best knowledge available on those measures found to be the most successful in resolving specific problems.

PREFACE

This synthesis documents current and innovative practices of U.S. transit agencies in the development and implementation of passenger no-show and late cancellation policies for paratransit programs operated under the regulatory requirements of the Americans with Disabilities Act of 1990 (ADA). It describes how some policies are administered, the community response, and their effectiveness in small, medium, and large transit agencies surveyed. It examines policies both as a way to improve system productivity, efficiency, and capacity, and as a means to better serve riders with disabilities who may experience difficulties with the advance reservation aspect of most ADA complementary paratransit operations. This topic is of interest to transit agencies that are responsible for providing ADA complementary paratransit that is efficient, cost-effective, and responsive to customer needs. It is also of interest to the disability community and other stakeholders who are concerned about having access to transportation services that are efficient, cost-effective, and appropriate for customer needs.

A detailed on-line survey was conducted to gather information from U.S. transit agencies that are responsible for providing ADA paratransit services. Based on survey results, topical case studies were developed to highlight specific policies and practices. These were combined with a comprehensive overview of ADA regulatory requirements, supplemented by a review of published FTA findings in some recent compliance reviews, to offer useful information.

A panel of experts in the subject area guided the work of organizing and evaluating the collected data and reviewed the final synthesis report. A consultant was engaged to collect and synthesize the information and to write the report. Both the consultant and members of the oversight panel are acknowledged on the title page. This synthesis is an immediately useful document that records the practices that were acceptable within the limitations of the knowledge available at the time of its preparation. As progress in research and practice continues, new knowledge will be added to that now at hand.

CONTENTS

PRACTICES IN NO-SHOW AND LATE CANCELLATION POLICIES FOR ADA PARATRANSIT

SUMMARY

Periodic passenger no-shows and late cancellations are an expected cost of doing business for most paratransit systems. However, at a time when the cost of providing Americans with Disabilities Act of 1990 (ADA) complementary paratransit is growing and all eligible demand for paratransit trips must be met, excessive no-shows and late cancellations can adversely affect the efficiency of service and significantly add to the cost. In response, many transit agencies have implemented policies to address no-shows and late cancellations. What has not been clear, however, is what impacts these various no-show/late cancellation policies have had on service efficiency and on the mobility of riders.

The purpose of this synthesis report is to document current and innovative practices of U.S. transit agencies in the development and implementation of passenger no-show and late cancellation policies for paratransit programs operating under the regulatory requirements of ADA. U.S.DOT regulations implementing ADA address the issue of no-show/late cancellation policies in ADA complementary paratransit service programs.

In addition to documenting regulatory requirements, this synthesis includes a summary of recent interpretations provided by FTA based on recent ADA paratransit compliance reviews and complaint responses. This report also describes how existing no-show and late cancellation policies are administered, the community response, and the effectiveness of these policies in small, medium, and large transit agencies surveyed throughout the United States.

The synthesis examines no-show and late-cancellation policies both as a way to improve system productivity, efficiency, and capacity, and as a way to better serve riders with disabilities who may experience difficulties with the advance reservation nature of most ADA complementary paratransit operations.

The synthesis includes a comprehensive overview of the regulatory requirements of ADA. The regulatory overview is supplemented by a review of the findings published by the FTA Office of Civil Rights in recent ADA compliance reviews and in response to formal complaints filed with that office. Several telephone interviews were conducted with FTA staff to clarify issues related to FTA findings and interpretations. This synthesis also includes a review of relevant literature and resources.

A detailed on-line survey was conducted to gather feedback from U.S. transit agencies that are responsible for providing ADA paratransit services. A total of 134 surveys were completed, for a return rate of 47%. The survey included questions about organizational structure; reservations, scheduling, and dispatching practices; no-show and late cancellation policies; public involvement and outreach efforts; technologies used to manage the service; and operating statistics. Based on the survey results and a review of 63 no-show policies submitted by survey respondents, key practices were highlighted that appear to support the intent of the ADA regulations and FTA findings.

The findings suggest that there is a diversity of interpretations with respect to what constitutes excessive no-shows and/or late cancellations.

The findings also suggest that there is a divergence of opinion and practice with respect to when a late cancellation becomes the functional equivalent of a no-show. For example, in letters of finding in connection with recent ADA paratransit reviews, FTA stated that a no-show policy that counted cancellations made after 5 p.m. on the day before service in its determination of a pattern or practice of missed trips was not consistent with the regulations and, therefore, should not be considered the "functional equivalent" of a no-show.

A third finding suggests that no-show/late cancellation policies should include the provision of adequate notice to passengers regarding apparent no-shows and provide a formal appeals process for contesting no-shows in accordance with the ADA regulations. A related issue is advising passengers that no-shows that are beyond the passenger's control are not to be counted against a passenger when documenting no-shows. The regulations require the forgiveness of apparent no-shows that are the fault of the transit agency or are a result of unforeseen illness, hospitalization, and so on that prevent the passenger from contacting the transit agency in a timely manner.

There are numerous examples of specific actions that transit agencies appear to be taking with respect to no-show policies that are in keeping with the ADA regulations and FTA letters of finding. These elements are highlighted in the report, including examples of passenger incentives, alternative approaches to policy development, technology as a tool to manage no-shows and late cancellations, documentation and record keeping practices, determination of what is beyond the rider's control when missing a trip, and passenger information dissemination.

The synthesis includes a description of elements that transit agencies may wish to include when developing or reviewing no-show and late cancellation policies.

Finally, the report identifies several areas that could benefit from additional research, particularly the cost of implementing a proactive and active no-show/late cancellation policy, as well as the overall system cost of incurring excessive no-shows and late cancellations.

CHAPTER ONE

INTRODUCTION

BACKGROUND AND OBJECTIVES

The purpose of this synthesis report is to document current and innovative practices of U.S. transit agencies in the development and implementation of passenger no-show and late cancellation policies for paratransit programs operated under the regulatory requirements of the Americans with Disabilities Act of 1990 (ADA). This topic is of interest to transit agencies that are responsible for providing ADA complementary paratransit that is efficient, cost-effective, and responsive to customer needs. This topic also is of interest to the disability community and other stakeholders who are concerned about having access to transportation services that are efficient, cost-effective, and appropriate for customer needs.

U.S.DOT regulations implementing ADA address the issue of no-show policies in ADA complementary paratransit service programs, specifically, 49 CFR 37.125(h), which states that

> The entity may establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit service to ADA paratransit eligible individuals who establish a pattern or practice of missing scheduled trips.

In addition to documenting regulatory requirements, this synthesis includes a summary of recent regulatory guidance and interpretations provided by FTA. This report also describes how existing no-show/late cancellation policies are administered, the community response, and the effectiveness of these policies in selected small, medium, and large transit agencies surveyed throughout the United States.

The synthesis examines no-show and late-cancellation policies both as a way to improve system productivity, efficiency, and capacity, and as a way to better serve riders with disabilities who may experience difficulties with the advance reservation nature of most ADA complementary paratransit operations. The report highlights no-show/late cancellation policies that meet the intent of the ADA regulations and that have been developed with full and meaningful local public participation.

SCOPE AND METHODS

The synthesis report includes a comprehensive overview of the regulatory requirements of ADA. The regulatory overview is supplemented by a review of the findings published by the FTA Office of Civil Rights in recent ADA compliance reviews and in response to formal complaints filed with that office. Telephone interviews were conducted with FTA staff to clarify issues related to FTA findings and interpretations. This synthesis also includes a review of relevant literature and resources.

A detailed on-line survey was conducted to gather feedback from U.S. transit agencies that are responsible for providing ADA paratransit services. A total of 134 surveys were completed of the 283 distributed, for a return rate of 47%. The survey included questions covering organizational structure; reservations, scheduling, and dispatching practices; no-show and late cancellation policies; public involvement and outreach efforts; technologies used to manage the service; and operating statistics. Based on the survey results, topical case studies were developed to highlight specific policies and practices.

REPORT ORGANIZATION

The synthesis report is composed of six chapters, including the introduction provided in this chapter.

Chapter two presents an overview of current federal regulations, along with a summary of recent guidance and interpretations relevant to the discussion of ADA complementary paratransit no-show/late cancellation policies and practices. First, relevant sections of the regulations are presented. Next, federal guidance and interpretations drawn from recent ADA complementary paratransit compliance reviews are described. The chapter concludes with a brief description of other resources that were identified during the literature review.

Chapter three includes the results of an on-line survey of 134 U.S. transit agency ADA coordinators and managers. The survey was intended to identify current no-show and late cancellation policies and practices employed by ADA paratransit programs. The information gathered through the survey also helped to identify innovative policies and practices for monitoring and managing no-shows and late cancellations.

Chapter four includes highlights of the no-show and late cancellation policies that were submitted by survey respondents.

Chapter five includes a description of features that transit agencies might want to consider when developing or reviewing the no-show and late cancellation policies.

Chapter six includes a summary of findings and identifies outstanding issues and future research needs.

CHAPTER TWO

CURRENT STATUS OF FEDERAL REGULATIONS

This chapter presents an overview of current federal regulations along with a summary of recent guidance and interpretation relevant to the discussion of ADA paratransit no-show and late cancellation policies and practices.

The chapter begins with a presentation of the relevant sections of the regulations. Next, federal guidance and interpretations drawn from recent ADA complementary paratransit compliance reviews are described. The chapter concludes with a brief description of other resources that were identified during the literature review.

FEDERAL REGULATIONS

Public entities that operate fixed-route transportation services for the general public are required by the U.S.DOT regulations implementing ADA to provide ADA complementary paratransit service for persons who, because of disability, are unable to use the fixed-route system. These regulations (49 CFR Parts 27, 37, and 38) include six service criteria, which must be met by ADA Complementary Paratransit service programs. Section 37.135(d) of the regulations required that ADA complementary paratransit services meet these criteria by January 26, 1997.

The U.S.DOT regulations implementing ADA address the issue of no-show policies in ADA complementary paratransit programs. Specifically, 49 CFR 37.125(h) states that

> The entity may establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit service to ADA paratransit eligible individuals who establish a pattern or practice of missing scheduled trips.

Section 37.125(h) further states that transit systems must consider only missed trips (no-shows) that are within the control of the rider and not count against the individual trips that are missed for reasons beyond the person's control, which may include trips missed because of operator error. Specifically, 49 CFR 37.125(h)(1) states that

> Trips missed by the individual for reasons beyond his or her control (including, but not limited to, trips which are missed due to operator error) shall not be a basis for determining that such a pattern or practice exists.

Section 37.125(h) also outlines steps that must be taken by a transit agency before any suspension of service is imposed. Specifically, 49 CFR 37.125(h)(2) states that

> Before suspending service, the entity shall take the following steps:
>
> (i) Notify the individual in writing that the entity proposes to suspend service, citing with specificity the basis of the proposed suspension and setting forth the proposed suspension;
> (ii) Provide the individual an opportunity to be heard and to present information and arguments;
> (iii) Provide the individual with written notification of the decision and the reasons for it.

Regarding the appeals process that must be made available to individuals for whom a suspension is proposed, the regulation states that the requirements that apply to the process available to persons who are denied eligibility [as detailed in Section 37.125(g)] are to be used. These appeals requirements include:

- Allowing the person an opportunity to be heard and to present information and arguments,
- A separation of functions (i.e., a decision on the appeal by a person not involved with the initial decision to suspend service), and
- A written notification of the appeal decision and the reasons for it.

Finally, Section 37.125(h)(3) of the regulation states that "The sanction is to be stayed pending the outcome of the appeal"; that is, ADA complementary paratransit service must continue to be made available to the person until the appeal of his or her proposed suspension is decided.

In the Construction and Interpretation of Provisions section of the regulation (Appendix D), there is significant additional information interpreting the intent of Section 37.125. There also is guidance on how several aspects of a no-show policy should be implemented. The applicable section of Appendix D included in the *Federal Register* (Vol. 56, No. 173, p. 45747) provides the following additional guidance:

> The rule also allows an entity to establish a process to suspend, for a reasonable period of time, the provision of paratransit service to an ADA eligible person who establishes a pattern or practice of missing scheduled trips. The purpose of this process would be to deter or deal with chronic 'no-shows.' The sanction system—articulated criteria for the imposition of sanctions, length of suspension periods, details of the administrative process, etc.—would be

developed through the public planning and participation process for the entity's paratransit plan, and the result reflected in the plan submission to FTA.

It is very important to note that sanctions could be imposed only for a 'pattern or practice' of missed trips. A pattern or practice involves intentional, repeated, or regular actions, not isolated, accidental, or singular incidents. Moreover, only actions within the control of the individual count as part of a pattern or practice. Missed trips due to operator error are not attributable to the individual passenger for this purpose. If the vehicle arrives substantially after the scheduled pickup time, and the passenger has given up on the vehicle and taken a taxi or gone down the street to talk to a neighbor, that is not a missed trip attributable to the passenger. If the vehicle does not arrive at all, or is sent to the wrong address, or to the wrong entrance to a building, that is not a missed trip attributable to the passenger. There may be other circumstances beyond the individual's control (e.g., a sudden turn for the worse in someone with a variable condition, a sudden family emergency) that make it impracticable for the individual to travel at the scheduled time and also for the individual to notify the entity in time to cancel the trip before the vehicle comes. Such circumstances also would not form part of a sanctionable pattern or practice.

Once an entity has certified someone as eligible, the individual's eligibility takes on the coloration of a property right…. Consequently, before eligibility may be removed 'for cause' under this provision, the entity must provide administrative due process to the individual.

If the entity proposes to impose sanctions on someone, it must first notify the individual in writing (using accessible formats where necessary). The notice must specify the basis of the proposed sanction (e.g., Mr. Smith scheduled trips for 8 a.m. on May 15, 2 p.m. on June 3, 9 a.m. on June 21, and 9:20 p.m. on July 10, and on each occasion the vehicle appeared at the scheduled time and Mr. Smith was nowhere to be found) and set forth the proposed sanction (e.g., Mr. Smith would not receive service for 15 days).

The entity would provide the individual an opportunity to be heard (i.e., an in-person informal hearing before a decision maker) as well as to present written and oral information and arguments. All relevant entity records and personnel would be made available to the individual, and other persons could testify. It is likely that, in many cases, an important factual issue would be whether a missed trip was the responsibility of the provider or the passenger, and the testimony of other persons and the provider's records or personnel are likely to be relevant in deciding this issue. While the hearing is intended to be informal, the individual could bring a representative (e.g., someone from an advocacy organization, an attorney).

The individual may waive the hearing and proceed on the basis of written presentations. If the individual does not respond to the notice within a reasonable time, the entity may make, in effect, a default finding and impose sanctions. If there is a hearing, and the individual needs paratransit service to attend the hearing, the entity must provide it. We would emphasize that, prior to a finding against the individual after this due process procedure, the individual must continue to receive service. The entity cannot suspend service while the matter is pending.

The entity must notify the individual in writing about the decision, the reasons for it, and the sanctions imposed, if any. Again, this information would be made available in accessible formats. In the case of a decision adverse to the individual, the administrative appeals process of this section would apply. The sanction would be stayed pending an appeal.

There are means other than sanctions, however, by which a transit provider can deal with a 'no-show' problem in its system. Providers who use 'real-time scheduling' report that this technique is very effective in reducing no-shows and cancellations, and increasing the mix of real-time scheduling in a system can probably be of benefit in this area. Calling the customer to reconfirm a reasonable time before pickup can head off some problems, as can educating consumers to call with cancellations ahead of time. Training of dispatch and operator personnel can help to avoid miscommunications that lead to missed trips.

In summary, some of the important additional aspects of no-show policies included in this excerpt from the interpretive section of the regulation are that:

- The specifics of the no-show policy must be developed through the public planning and participation process.
- A "pattern or practice" of missed trips involves intentional, repeated, or regular incidents.
- Missed trips caused by scheduling errors or vehicles arriving late for pick-ups should not be held against the rider.
- Issues related to disability or to sudden emergencies that make it impracticable for riders to keep scheduled pick-ups or to call and cancel in a timely way can also be considered "beyond the rider's control."
- ADA paratransit eligibility is to be treated at the level of a "property right" and the administrative process used in imposing sanctions must be careful to provide full due process.
- Before sanctions can be imposed, transit agencies must notify riders in writing and list, in detail, the no-shows that have been recorded against them.
- An informal hearing process must be provided for riders to dispute the no-shows recorded or to offer reasons that the missed trips were beyond their control.
- Transportation to this hearing must be provided, if needed.
- After this informal hearing, if sanctions are to be imposed, riders must be notified in writing of this and given the specific reasons for the decision.
- Riders then must be allowed to request a formal appeal (under appeal procedures similar to those used when applicants are denied eligibility).
- Access to the ADA complementary paratransit service must be continued through the hearing and appeal process.
- Approaches other than sanctions and suspensions for addressing no-show problems are encouraged.

RECENT FEDERAL TRANSIT ADMINISTRATION GUIDANCE AND INTERPRETATIONS

FTA is responsible for ensuring compliance with ADA and U.S.DOT regulations. As part of its compliance efforts, FTA, through its Office of Civil Rights, reviews formal complaints filed with its office and conducts periodic reviews of fixed-route transit and ADA complementary paratransit services operated by grantees. The information included here represents

publicly available regulatory interpretations and guidance offered by FTA based on ADA paratransit compliance reviews, related transmittal letters and letters of findings, and responses to consumer complaints that pertain to the topic of no-show and late cancellation policies.

Two primary concerns related to no-show/late cancellation policies have been identified by FTA during recent reviews of grantee ADA complementary paratransit programs. The first issue is concerned with late cancellation policies. The second issue is concerned with establishing a pattern or practice of no-shows.

Late Cancellations

> "[The transit system] should reconsider its policy of suspending persons who do not cancel by 5:00 PM on the day before service and should ensure that its definition of a late cancellations is operationally equivalent to a no-show in terms of the negative impact on the service" (FTA October 1993).

In a November 2002 review of ADA paratransit service provided by a transit system, FTA stated that a no-show policy that counted cancellations made after 5 p.m. on the day before service in its determination of a pattern or practice of missed trips was not consistent with the regulations. The finding specifically stated that

> The regulations allow transit systems to suspend service for a reasonable period for riders who abuse the system by regularly 'no-showing' for scheduled trips. While transit agencies have in recent years also considered 'late cancellations' to be an abuse of the system and have considered this in their suspension policies, the effects of a late cancellation should be operationally equivalent to a no-show in terms of the negative impact on the service. Cancellations made several hours in advance of the scheduled pick-up time would still seem to allow the system's dispatchers to use the open vehicle time to respond to same-day operating issues. Systems, which operate without 'floater' vehicles or with limited 'floater' capacity, often rely on same-day cancellations to be able to operate reliably and on-time. [The transit system] should reconsider its policy of suspending persons who do not cancel by 5:00 PM the day before service and should ensure that its definition of a late cancellation is operationally equivalent to a no-show in terms of its impact on the service (FTA October 2003).

In a June 2004 letter, from FTA, this position was reiterated:

> The regulations permit service suspension only for customer missed trips and not for late cancellations such as described in [the paratransit system's] policies. FTA recognizes late cancellations that are the 'functional equivalent' of a missed trip, or customer no-show, in service suspension policies. FTA does not consider cancellations after 5:00 PM on the day before the service day the functional equivalent of a trip missed by a customer.
>
> While it is recognized that cancellations after 5:00 PM affect schedules that are created a day in advance, FTA does not agree that the slack time initially created by cancellations received well in advance of the actual pick-up time have the same effect on capacity and costs as riders not boarding after vehicles have already traveled to the pick-up location (missed trips). In fact, many systems rely on a certain percent of cancellations to create the slack time in schedules needed to address same day service delivery issues, such as routes running late. This is particularly true in systems [such as this transit system] where floater vehicles are not used and same day service issues are largely handled through utilization of available slack time on runs. Much of the slack time initially created by cancellations is therefore eventually used effectively. This may not be the case, though, if cancellations are made close to the scheduled pick-up time (e.g., less than 1–2 hours before the scheduled pick-up time).

As indicated in this correspondence, late cancellations can be considered a kind of missed trip as long as they are the "functional equivalent" of a no-show. According to FTA, cancellations made after 5 p.m. the day before service are not the functional equivalent of a no-show; however, cancellations made only 1 to 2 h before the scheduled pick-up might be considered the functional equivalent of a no-show.

Pattern or Practice of No-Shows

> "A pattern or practice involves intentional, repeated, or regular actions, not isolated, accidental, or singular incident" (FTA October 2003).

In the same transit system review, FTA provided additional guidance on what level of no-shows might be considered a pattern or practice of abuse of the system.

> Considering only six no-shows or late cancellations in a six-month period to be excessive and an abuse of the service may unreasonably limit service to ADA eligible customers. Appendix D of 49 CFR Part 37 indicates that suspensions of eligibility for no-shows are intended to prevent a 'pattern or practice of "no-shows."' It is further noted, 'a pattern or practice involves intentional, repeated, or regular actions, not isolated, accidental, or singular incidents.' [The transit system] should reconsider this policy and should also consider analyzing overall frequency of riders' use of the service as well as the number of no-shows when determining whether there is a sufficient pattern or practice of no-shows to justify a suspension (FTA October 2003).

In its March 2004, quarterly progress report, the transit system changed its no-show policy so that 10 violations within a 6-month period may result in a suspension of 2 weeks, and 15 violations within the same rolling 6-month period may result in a suspension of 3 weeks. In a December 2004, letter FTA stated that

> We remain concerned that [the transit system's] revised policy could result in suspension of service for regular riders who, due to the frequency of their trips, amass 10 to 15 violations, but at the same time do not establish a pattern or practice of no-shows. To appropriately determine such a pattern or practice, we encourage you to consider the frequency of use by the rider.

Automatic Cancellation of Return Trips

> "We find [the transit system's] policy to cancel automatically a return trip if the rider was a 'no-show' for the first half of the trip not acceptable" (FTA February 2001).

FTA also has provided guidance on scheduling and dispatching procedures related to rider no-shows. In a letter of finding from February 2001, from FTA to a costumer, related to a complaint that a return ride was automatically canceled by the transit system after the rider was recorded as a no-show on the "going" portion of the roundtrip, the FTA stated: "We find [the transit agency's] policy to cancel automatically a return trip if the rider was a 'no-show' for the first half of the trip not acceptable."

Then, in a follow-up letter in April 2001, from FTA to the same transit agency, FTA stated: "We ask that you take every step possible to ensure that an assumed 'no-show' is in fact an actual 'no-show' before canceling the return trip."

Other Related FTA Findings

Additionally, several other recent ADA compliance reviews have cited issues relating to no-show/late cancellation policies and practices. These letters included findings related to the frequency of use (i.e., establishing a pattern or practice of no-shows), duration of suspension, and late cancellations as the functional equivalent of no-shows.

For example, in a December 2003 letter to a transit agency, FTA requested that the agency

> Please review your policy regarding late cancellations to ensure that only late cancellations that are the functional equivalent of a no-show are considered in your suspension policy and provide my office with your updated policy within 30 days.
>
> As for the suspension of service for no-shows/late cancellations, considering only three no-shows or six cancellations in a 30-day period to be excessive and an abuse of the service may unreasonably limit service to ADA-eligible customers.… [the transit agency] should reconsider this policy and should also consider analyzing overall frequency of riders' use of the service, as well as the number of no-shows, when determining whether there is a sufficient pattern or practice of no-shows to justify a suspension (FTA December 2003).

In a later ADA paratransit compliance review of a transit's agency's ADA paratransit system, FTA again expressed the need to consider the frequency with which riders use the service when determining whether a certain number of no-shows or late cancellations constitute a pattern or practice of abuse of the service. The finding specifically stated that

> A policy of considering only six missed trips in a calendar year to constitute a pattern or practice of abuse may unreasonably limit service to ADA eligible customers and does not appear to be consistent with the intent of the regulations. Appendix D of 49 CFR Part 37 indicates that, 'suspensions of eligibility for no-shows are intended to prevent a "pattern or practice of 'no-shows."' It is further noted, 'a pattern or practice involves intentional, repeated or regular actions, not isolated, accidental, or singular incident.' For a person traveling regularly (e.g., 10 trips a week), this level of missed trips would constitute only about 1% of all scheduled rides. Missing only one out of every 100 trips scheduled does not seem to be a reasonable standard for defining a 'pattern or practice' or abuse of the service (FTA April 2004).

In response to this finding, the transit agency drafted a new policy based on a point system, which was submitted to FTA in a quarterly report. However, in a December 2004, letter to the transit agency, FTA provided a clarification of its request for corrective action:

> The proposed policy detailed in [the transit agency's] July 15, 2004, letter proposes a first suspension (for three days) for eight (8) accumulated points in a 180-day period. The suspension could therefore be triggered for a total of four no-shows, with two points given for each no-show. The prior policy, which FTA questioned, allowed for a suspension after six no-shows in a calendar year. The proposed policy seems to be only a marginal change. Under the proposed policy, a person traveling five days a week (10 one-way trips a week) could be suspended for no-showing only 1.5% of their scheduled trips. We still feel that this rate of no-shows does not constitutes a 'pattern or practice' as intended by the regulations. To appropriately determine a 'pattern or practice,' we also would suggest that the new policy consider the frequency of use of the service by the rider.
>
> The proposed policy also escalates the period of suspension from three days (for 8 points, or 4 no-shows) to one year (for 21 points, or 11 no-shows). Section 37.125(h) of 49 CFR Part 37 allows for a suspension for 'a reasonable period of time.' Given the importance of paratransit service to an ADA paratransit eligible person, a one-year suspension for missing 11 one-way trips (or perhaps only 5 round-trips out of a potential 130 round-trips, at 5 per week) in a six-month period does not seem to be reasonable.

In another ADA paratransit compliance review final report, published in October 2004, FTA included findings related to no-shows and late cancellation policies and practices. One finding noted that:

> While the current practice appears to be appropriate, the formal policy, which considers seven or more no-shows or late cancellations in a six-month period to be an abuse of the service could unreasonably limit service to ADA eligible customers and does not appear to be consistent with the intent of the regulations. . . . Seven no-shows or late cancellations in a six-month period, particularly when considering a customer who uses the service frequently, may not rise to the level of a pattern or practice as intended by the regulations and described in the associated appendix (FTA October 2004).

FTA also found that

> The regulations allow transit systems to suspend service for a reasonable period for riders who abuse the system by regularly 'no-showing' for scheduled trips. While transit agencies have in recent years also considered 'late cancellations' to be an abuse of the system and have considered this in their suspension policies, the effects of a late cancellation should be operationally equivalent to a no-show in terms of the negative impact on the service. Cancellations made several hours in advance of the scheduled pick-up time would still seem to allow the system's dispatchers to use the open vehicle time to respond to same-day operating issues. Systems, which operate without 'floater' vehicles or with limited 'floater' capacity, often rely on same-day cancellations to be able to operate reliably and on time. [The transit agency] should reconsider its policy of suspending persons who do not cancel by 5:00 PM the day before service and should ensure that its definition of a 'late cancellation' is operationally equivalent to a no-show in terms of its impact on the service (FTA October 2004).

The most recent findings related to no-show/late cancellation policies were included in the final report for an ADA paratransit review, which was issued in January 2005. Two of FTA's findings related to no-shows and late cancellations. One finding stated that:

> [The transit agency's] policy of considering only three no-shows in a 90-day period to be excessive and an abuse of the service may unreasonably limit service to ADA eligible customers and does not appear to be consistent with the intent of the regulations. Appendix D of 49 CFR Part 37 indicates that suspensions of eligibility for no-shows are intended to prevent a 'pattern or practice of "no-shows".'… 'A pattern or practice involves intentional, repeated or regular actions, not isolated, accidental, or singular incidents.' Given that a rider who forgets that he or she has booked a trip could be assessed two no-shows for a single round-trip, three no-shows could be exceeded by forgetting to cancel only two round-trips. For a rider who travels regularly (say, 10 one-way trips a week), three missed trips in a 90-day period would be only two percent of the total trips made by that person. Missing only two out of every 100 trips scheduled does not seem to be a reasonable standard for defining a 'pattern or practice' or abuse of the service (FTA January 2005).

In the January 2005, letter transmitting the final report, FTA further clarifies its position with respect to assessing no-shows:

> While FTA understands that passenger no-shows impose a cost on service, [the transit agency's] current policy appears unduly severe for frequent riders. One way of addressing frequent riders in [the] policy is to consider trip frequency as part of the policy. And while a rider may appeal a service suspension and transit agency staff may be cautious in applying the policy, this does not make the policy reasonable.
>
> Please identify what actions [the transit agency] plans to take to further review its policy of suspending service for three no-shows in a 90-day period.

Another finding from the same final report relating to suspensions stated that

> [The transit agency's] policy regarding suspensions does not appear to be a 'reasonable sanction' for abuses of the service. DOT ADA regulations allow service to be suspended for a pattern or practice of no-shows for a 'reasonable period of time.' The current [transit agency] policy could result in a suspension of eligibility for one year, a revocation of eligibility, and a requirement to reapply for eligibility for a rider who no-shows or late cancels 12 times over a one-year period (FTA January 2005).

In this same letter, transmitting the final report to the transit agency, FTA further clarifies its position with respect to the transit agency's policy for suspending service:

> For a rider who takes 10 one-way trips per week, 12 no-shows or late cancels over a one-year period would represent a no-show/late cancel rate of less than three percent. The potential suspension of one year seems unduly severe for such a rider. As suggested in Finding A.9, one way of addressing frequent riders in [the transit agency's] policy is to consider trip frequency as part of the policy. The fact that [the transit agency] has been lenient in enforcing this policy is not 'evidence of the value and effectiveness of the new policy' and does not make the policy reasonable.
>
> Please identify what actions [the transit agency] plans to take to further review its policy of suspending eligibility for 12 no-shows or late cancels in a year.

This comment is slightly different from the other reviews in that it points out FTA's position that being lenient in enforcing the suspension policy does not make the policy reasonable.

OTHER RESOURCES

In addition to the regulatory review, a literature and resource review was conducted as part of this synthesis study including a targeted search of FTA, APTA, Community Transportation Association of America, and Transportation Research Information Service websites.

There were few references specifically focusing on no-shows and late cancellations. Typically, the documentation was found in discussions related to the 14-day advance reservation requirement originally included in the ADA regulations. As originally written, the ADA regulations required that reservations be accepted up to 14 days in advance [49 CFR 37.121(b)(4)]. That requirement was dropped on May 21, 1996, allowing transit agencies—with public input—to change their advance reservation procedures. It was felt that by allowing customers to book 2 weeks in advance, they would either generate additional calls to cancel or reschedule a trip during that period or result in additional no-shows or same-day cancellations, because customers forgot they had booked a trip or plans changed at the last minute. The discussion included in the *Federal Register* stated that

> The most common complaint about advance reservations was that they caused an unmanageable number of cancellations and no-shows. Twenty-one commenters suggested penalties for riders who failed to show up for scheduled rides. Twelve other commenters suggested that this problem could be solved by requiring confirmation. Among these twelve comments were three different suggestions for when the confirmation should be made; there was also disagreement over whether the rider or the transit provider should be responsible for making the confirmation call (*Federal Register* 1996).

Finally, the literature review identified a 1993 publication, the *Americans with Disabilities Act* (*ADA*) *Paratransit Eligibility Manual Final Report*. The document, prepared for FTA, specifically addressed the issue of no-show and late cancellation policies. The report reiterated the requirements of 49 CFR 37.125(h), described in the previous section, and pointed out that

> It is important to note that 'no-shows' are different than cancellations and that the regulations do not specify that service can be suspended for a pattern or practice of cancellations. A major cause of cancellations is the advance notice required for use of paratransit services—a policy that does not exist for fixed-route service. Sanctions cannot be imposed on individuals whose schedules change frequently and who are therefore required to change or cancel their scheduled paratransit trips (EG&G Dynatrend 1993).

Another comment included in the report suggested an approach for establishing a pattern or practice of no-shows, which might be applicable to this discussion:

> Regardless of the method used, the measure should be able to be defended as a pattern or practice. One way to do this is to compare the measure that is considered excessive to the system wide average for no-shows. For example, if there is a one percent no-show rate for the entire system, establishing a standard that would equal a three percent rate, even for frequent users of the service, would be defensible (EG&G Dynatrend 1993).

This comment appears to be the first occurrence of a suggested formula for determining a pattern or practice of no-shows and appears to be consistent with recent FTA compliance review findings. Applying the example given to a system that has an average of 4% no-shows, the language in the manual suggests that a pattern or practice might be established if a rider had three times this average rate (or 12% no-shows).

SUMMARY

Much has been written about the topic of complying with the ADA paratransit regulations, particularly the debate over accommodating all eligible trip requests. Although this additional guidance does not establish what frequency of no-shows might constitute a pattern or practice or what period of suspension might be considered "a reasonable period of time," it does begin to frame the issues and indicates what types of policies FTA may not consider acceptable based on recent ADA regulatory interpretations.

CHAPTER THREE

SURVEY OF TRANSIT AGENCIES

A primary focus of this synthesis project is to identify current no-show and late cancellation policies and practices used by transit agencies in the provision of ADA complementary paratransit service. As part of this report, a survey was conducted with U.S. transit agency ADA coordinators and managers to identify current policies and practices. The information gathered through the survey also helped to identify innovative policies and practices for monitoring and managing no-shows and late cancellations.

A copy of the survey is included in Appendix A. The results for all survey questions are described in this chapter. It should be noted that the numbering of questions varies between the on-line and paper versions of the survey; however, the questions and their order are the same.

In addition to the survey, respondents were asked to submit copies of their no-show/late cancellation policies for review as part of this synthesis project. A total of 63 policies were received. A summary of innovative ideas gleaned from the policies is provided in chapter four.

CHARACTERISTICS OF SURVEY RESPONDENTS

In all, 134 completed surveys were returned, for a response rate of 47.3%. Surveys were returned from transit agencies in 36 states and the District of Columbia (see Appendix B). They represent a cross section of small, medium, and large transit agencies, ranging from 46 to 2.5 million one-way ADA paratransit trips annually, and averaging 304,150 trips per year. The average passenger no-show rate reported by those agencies was 2.9% (that rate also includes what some systems term "late cancellations").

To better understand how transit agencies operate their ADA paratransit systems, the survey asked the respondents to identify whether they provide ADA paratransit only, a combination of ADA paratransit and other paratransit services using the same vehicles for both, or a combination of ADA paratransit and other paratransit services using different vehicles for each. Of the 132 agencies responding to this question, 64 (48.5%) reported that they provide both ADA paratransit and other paratransit services using the same vehicles, 52 (39.4%) indicated that they provide ADA paratransit service only, and 16 (12.1%) indicated that they provide ADA paratransit and other paratransit services using different vehicles (see Figure 1).

Systems also were asked to describe the level of driver assistance provided: curb-to-curb, door-to-door, or door-through-door. Respondents could check more than one answer. More than half of the 120 respondents who answered the question 75 (62.5%) indicated that service is provided curb-to-curb, 61 (50.8%) that service is provided door-to-door, and 8 each (6.7%) that service was provided door-through-door or in some "other" way (see Figure 2). Most of the "other" responses indicated that service is provided door-to-door on request or on a "common sense" basis.

Survey respondents were asked to identify which entity—transit agency, broker, or contract operator—performs particular functions related to ADA paratransit operations including (1) initial trip reservations/advance cancellations/changes, (2) same-day cancellations, (3) "where's my ride?" calls, (4) "will calls" or "call when ready" calls, (5) scheduling, (6) dispatching, (7) vehicle operation, and (8) customer comments and complaints. Multiple answers were permitted. The results are summarized in Figure 3. With the exception of vehicle operations, the table shows that most functions are conducted by transit agency staff, ranging from 54% (dispatching) to 92% (customer comments and complaints). In the case of vehicle operations, 62% of the respondents use contract operators and 53% of transit agencies operate ADA paratransit vehicles. Very few of the systems surveyed indicated that they use brokers (ranging from 5% to 8%, depending on the function).

OVERVIEW OF SURVEY RESULTS

The discussion of survey results is divided into five topical areas: (1) operating policies and practices, (2) definitions used to describe no-shows and cancellations, (3) no-show and late cancellation policies, (4) personnel practices related to no-shows and late cancellations, and (5) no-show and late cancellation outcomes.

Operating Policies and Practices

A number of questions were asked dealing with the design of the ADA paratransit system and how daily operations are handled. These design characteristics included (1)

1. Please indicate what types of paratransit services are provided by your transit agency: (check one)			
		Response Percent	Response Total
ADA complementary paratransit only		39.4%	52
ADA complementary paratransit service AND other paratransit services provided using the SAME vehicles		**48.5%**	**64**
ADA complementary paratransit service AND other paratransit services provided using DIFFERENT vehicles		12.1%	16
		Total Respondents	**132**
		(skipped this question)	2

FIGURE 1 Paratransit services provided.

61. What level of driver assistance is provided for ADA complementary paratransit service? (check all that apply)			
		Response Percent	Response Total
Curb-to-curb		**62.5%**	**75**
Door-to-door		50.8%	61
Door-through-door		6.7%	8
View Other (please specify)		6.7%	8
		Total Respondents	**120**
		(skipped this question)	14

FIGURE 2 ADA paratransit level of driver assistance.

56. Please indicate for each function if it is performed by transit agency employees, contracted broker employees, or contracted operator employees.				
	Transit Agency	**Contract Broker**	**Contract Operator**	**Respondent Total**
Initial trip reservations/advance cancellations/changes	**59% (70)**	6% (7)	35% (41)	**118**
Same day cancellations	**60% (70)**	7% (8)	39% (45)	**116**
"Where's my ride?" calls	**65% (76)**	6% (7)	40% (47)	**117**
"Will calls" or "call when ready" returns	**60% (59)**	5% (5)	40% (40)	**99**
Scheduling	**60% (71)**	8% (9)	37% (44)	**119**
Dispatching	**54% (64)**	6% (7)	49% (58)	**118**
Vehicle operation	53% (62)	7% (8)	**62% (73)**	**118**
Customer comments/complaints	**92% (109)**	7% (8)	25% (30)	**119**
			Total Respondents	**119**
			(skipped this question)	15

FIGURE 3 Functional responsibilities.

making trip requests and scheduling trips and (2) using technology to monitor and manage no-shows and late cancellations.

Making Trip Requests and Scheduling Trips

Respondents were asked to indicate the maximum number of days in advance that trip requests can be made. When adopted, the ADA regulations required transit agencies to accept reservations at least 14 days and up to 1 day in advance of the trip. As noted in chapter two, that requirement was changed in 1996, allowing transit agencies—with public input—to shorten the advance reservation time frame. Of the 130 responses, 56 (43.1%) accept reservations up to 14 days in advance, 32 (24.6%) accept reservations up to 7 days in advance, and 16 (12.3%) accept reservations more than 14 days in advance (see Figure 4). When systems that provide ADA complementary paratransit service only are included, the results are similar.

Next, respondents were asked to indicate what the normal cutoff time is to place a trip request (not including will calls or call when ready trips). Of the 131 systems that responded, 67 (51.1%) reported that the normal cutoff time is 5 p.m. the day before a trip is requested, 17 (13.0%) accept reservations the same day as the trip request, 12 (9.2%) accept trip requests until 6 p.m. the day before, 8 (6.1%) accept trip requests until 4 p.m. the day before, and 27 (20.6%) reported other cutoff times (see Figure 5).

3. What is the maximum number of days in advance that trip requests can be made? (select one)

		Response Percent	Response Total
same day		0%	0
1 day		5.4%	7
3 days		5.4%	7
5 days		3.1%	4
7 days		24.6%	32
14 days		**43.1%**	**56**
more than 14 days		12.3%	16
Other (please specify)		6.2%	8
	Total Respondents		**130**
	(skipped this question)		4

FIGURE 4 Timing of trip requests.

4. What is the normal cutoff time to place a reservation? (check one)

		Response Percent	Response Total
Same day		9.2%	12
4pm day before trip is scheduled		13%	17
5pm day before trip is scheduled		**51.1%**	**67**
6pm day before trip is scheduled		6.1%	8
Other		20.6%	27
	Total Respondents		**131**
	(skipped this question)		3

FIGURE 5 Normal cutoff time for placing a trip request.

When asked to describe their basic scheduling process, 84 (63.6%) of the 132 transit agencies answering this question noted that they accept trip requests one or more days in advance and scheduled while the customer is on the telephone and 33 (25.0%) that they accept trip requests one or more days in advance and then trips are batch scheduled. One transit agency (0.8%) accepts same-day trip requests and 14 (10.6%) noted they had some "other" process for scheduling trips, typically some combination of the first two responses (see Figure 6).

The survey next asked whether passengers were routinely called back to confirm their scheduled pick-up times. Of the 132 agencies that responded to this question, 114 (86.4%) answered "no" and 18 (13.6%) answered "yes" (see Figure 7). Of the 33 transit agencies that accept reservations and then batch schedule them later, only 7 (21.2%) reported that they routinely call customers back to confirm the pick-up time. In a follow-up question, several respondents stated that customers are advised to call back the evening before or day of their trip to confirm their pick-up time. In several cases, respondents mentioned that only customers whose trips have to be shifted more than 10 min are called back to advise them of the change in their pick-up times; otherwise, the estimated pick-up times (or windows) are honored by schedulers.

Additionally, transit agencies were asked to describe the pick-up window they use when scheduling trips. The pick-up window is the time before and after a trip is scheduled that a passenger is expected to be ready to travel. Most systems use some type of pick-up window to give schedulers and drivers some flexibility in the actual pick-up time and still be considered on time. By far the most prevalent answer was 15 min before to 15 min after the scheduled pick-up time. The most frequently cited pick-up windows are listed here:

- −15/+15 pick-up window, used by 38.6%.
- −10/+10 pick-up window, used by 6.8%.
- 0/+30 pick-up window, used by 5.3%.
- −20/+20 pick-up window, used by 4.5%.
- −5/+5 pick-up window, used by 3.0%.
- 0/+20 pick-up window, used by 3.0%.

The survey also asked how long a driver is instructed to wait for a passenger, assuming that the driver arrives during the designated pick-up window. The most common answer was that drivers were to wait for 5 min, which was reported by 100 (75.8%) of the 132 transit agencies answering this question (see Figure 8). Other transit agencies reported wait times of 0 min, 2 (1.5%); 2 min, 3 (2.3%); 3 min, 9 (6.8%); 4 min, 2 (1.5%); 10 min, 5 (3.8%); or "other," 11 (8.3%). Of

12. Which of the following best describes the trip reservation and scheduling process for your ADA complementary paratransit service for initial reservations (not will call/call when ready trips)? (check one)

	Response Percent	Response Total
Trip requests are taken 1 or more days in advance and scheduled with customer on the phone	**63.6%**	**84**
Trip requests are taken 1 or more days in advance and then batch scheduled later	25%	33
Trip requests are taken and then same-day dispatched (real-time scheduling)	0.8%	1
View Other (please specify)	10.6%	14
Total Respondents		**132**
(skipped this question)		2

FIGURE 6 Scheduling trip requests.

15. As part of the reservations process, are passengers routinely called back to confirm their scheduled pick-up times?

	Response Percent	Response Total
Yes	13.6%	18
No	**86.4%**	**114**
Total Respondents		**132**
(skipped this question)		2

FIGURE 7 Passenger call backs to confirm trips.

10. How long are drivers required to wait for a passenger at the pick-up location assuming the driver arrives WITHIN the stated pick-up window?			
		Response Percent	**Response Total**
0 minutes		1.5%	2
1 minute		0%	0
2 minutes		2.3%	3
3 minutes		6.8%	9
4 minutes		1.5%	2
5 minutes		**75.8%**	**100**
10 minutes		3.8%	5
Other (please specify)		8.3%	11
		Total Respondents	**132**
		(skipped this question)	2

FIGURE 8 Driver wait times for passengers.

the two systems that reported waiting zero minutes for a passenger, one defined the pick-up window as 5 min before to 10 min after the scheduled pick-up time; the other defined the pick-up window as 15 min before to 15 min after the scheduled pick-up time.

The survey also asked whether systems have designated pick-up locations at large facilities (e.g., main entrances at hospitals or particular store entrances at shopping malls). Of the 132 agencies that responded to this question, 58 (43.9%) have designated pick-up locations without paratransit stop signs and 20 (15.2%) have designated pick-up locations with paratransit stop signs. Slightly more than one-third, 48 (36.4%), indicated that they do not have designated pick-up locations (see Figure 9).

Using Technology Resources

The survey included a section about what technology resources were used by the respondents. Figure 10 shows that most respondents 99 [(79.2%) of the 125 respondents] reported using computerized scheduling and dispatching software. Of those, 77.7% indicated that their software included a no-

9. Has your system established designated paratransit pick-up locations at large facilities (such as hospitals or shopping malls)?			
		Response Percent	**Response Total**
Yes, we have designated pick-up locations WITH signs		15.2%	20
Yes, we have designated pick-up locations WITHOUT signs		**43.9%**	**58**
No, customers may request any pick-up location in the service area		36.4%	48
Other		4.5%	6
		Total Respondents	**132**
		(skipped this question)	2

FIGURE 9 Designated pick-up locations for paratransit.

50. What technologies do you currently use? (check all that apply)

	Response Percent	Response Total
Computer scheduling/dispatching software	79.2%	99
Automatic Vehicle Loaction (AVL)	28.8%	36
Mobile Data Computers (MDcs) or Mobile Data Terminals (MDTs)	27.2%	34
Not applicable	12%	15
View Other (please specify)	12%	15
Total Respondents		125
(skipped this question)		9

FIGURE 10 Use of technology.

show/late cancellation module and 68.9% indicated that they have used that module. Additionally, 36 (28.8%) have automatic vehicle location (AVL) and 34 (27.2%) have mobile data terminals (MDTs).

In an open-ended question, respondents also were asked how they use technology to help reduce no-shows and late cancellations. Of the 83 respondents to this question (61.9% of 134), 34.9% indicated that technology aids in the documentation and monitoring of no-shows and late cancellations and 18.0% that technology helps dispatchers rework schedules in real time. AVL was credited by 9.6% of the respondents with helping dispatchers identify the actual locations of vehicles to confirm the driver's location. That same percentage also credited technology with helping to create more productive schedules. Another 6.0% stated that technology allowed them to offer same-day trips. One transit agency commented that "the software tracks the no shows, and with enforcement of policy we have reduced no shows from 12% to approximately 2%." At the same time, according to 20.5% of the respondents, technology provides no benefit to handling no-shows and late cancellations.

Respondents were asked whether their software included a no-show/late cancellation module. Of the 103 respondents to this question, 77.7% indicated that their software does provide a module to monitor and manage no-shows and late cancellations. Respondents also were asked whether they used the module. Of the 90 responding to this question, 68.9% said they used the module. A more detailed discussion of the use of technology is included in chapter four.

Definitions Used to Describe No-Shows and Cancellations

Every system has its own terminology to describe various circumstances. What is important is to understand how a given system uses particular terms. To better understand how passenger no-shows and cancellations are defined and handled by transit agencies, the survey asked respondents to define the following terms: (1) no-show, (2) advance cancellation, (3) cancellation, (4) late cancellation, (5) same-day cancellation, (6) excessive no-shows and cancellations, and (7) beyond the rider's control.

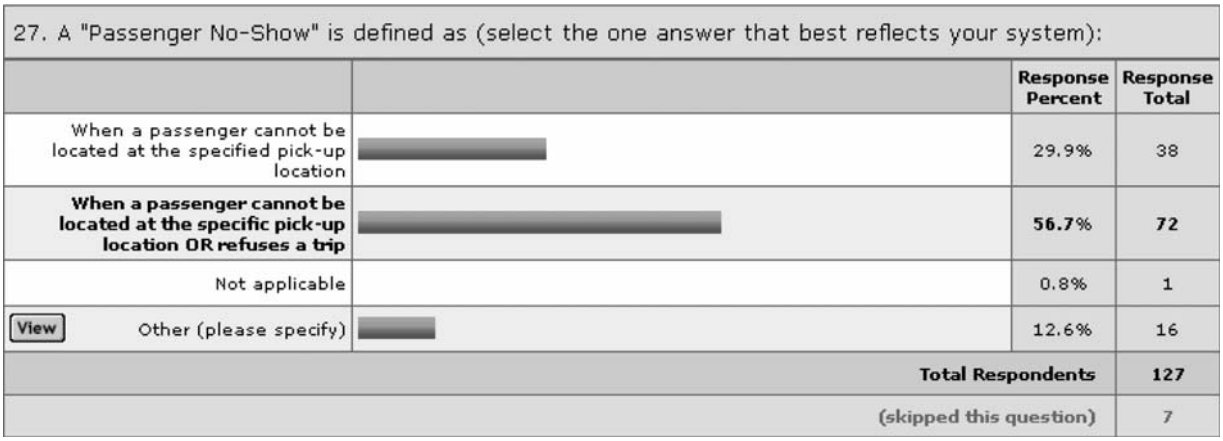
No-Show

The survey asked respondents to describe how they define a passenger no-show. Of the 127 responding to this question, 72 (56.7%) defined a passenger no-show as "when a passenger cannot be located at the specific pick-up location OR refuses a trip"; 38 (29.9%) defined a passenger no-show as "when a passenger cannot be located at the specified pick-up location" (see Figure 11). The difference between the two definitions is whether customer contact was made (and the customer refused the trip). Operationally they may be the same, but a transit system may track these numbers separately for documentation purposes.

Some other definitions of a no-show included trips that are cancelled within 1 or 2 h of the scheduled pick-up time: other systems might call trips cancelled 1 to 2 h in advance a late cancellation (described later in this section). This terminology becomes important in the discussion of no-show/late cancellation policies in chapter four.

Advance Cancellation

The survey requested that transit agencies indicate how they defined an advance cancellation. The most common answer was "not applicable," which was selected by 40.9% of the 127 respondents answering this question. The most common definition of an advance cancellation was "a trip that is canceled more than 1 day before a scheduled trip," with 21.3% of the responding transit agencies selecting that answer. The second most common definition was "a trip that is canceled more than 2 hours before a scheduled trip," with 11.8% selecting that answer, followed by "a trip that is canceled more than 1 hour



27. A "Passenger No-Show" is defined as (select the one answer that best reflects your system):

	Response Percent	Response Total
When a passenger cannot be located at the specified pick-up location	29.9%	38
When a passenger cannot be located at the specific pick-up location OR refuses a trip	**56.7%**	**72**
Not applicable	0.8%	1
View Other (please specify)	12.6%	16
Total Respondents		**127**
(skipped this question)		7

FIGURE 11 Definitions of a passenger no-show.

before a scheduled trip," with 8.7%. A few respondents defined an advance cancellation as occurring 30 min, 90 min, or 3 h before the scheduled trip. Again, the definition of late cancellation that a system uses will be important to the discussion of no-show/late cancellation policies in chapter four.

Cancellation

In contrast to the definition of advance cancellations, "cancellations" were cited as "not applicable" by only 17.5% of the respondents. Of the 126 responses received, 27.0% defined a cancellation as "a trip that is canceled at least 1 hour before a scheduled trip," 19.0% defined a cancellation as "a trip that is canceled at least 2 h before a scheduled trip," and 7.1% defined a cancellation as "a trip that is canceled at least 1 day before a scheduled trip." Those that checked "other" tended to elaborate on the definitions provided in the survey and were more specific about what exactly constitutes a cancellation (e.g., a cancellation that occurs before 4:30 p.m. the day before or a cancellation received before a trip has been dispatched, and so on).

Same-Day Cancellation

Almost one-half of the 127 respondents who answered this question (46.9%) indicated that the term "same-day cancellation" was not applicable to their systems. With respect to the definition, 15.7% described "same-day cancellations" as "a trip that is canceled less than 2 hours before a scheduled trip." Almost the same percentage (15.0%) described that period as 1 h before a scheduled trip, with another 13.3% defining same-day cancellations another way. Some of the variations in the definition included "after 10 p.m. [the] day before and more than 4 hours before scheduled ride," "any cancellation received after the first bus pulls out from the garage the DAY the trip is scheduled to be taken," or "a trip that is cancelled prior to [a] vehicle heading to pick up client."

Late Cancellation

The survey asked transit agencies to indicate how they define a "late cancellation." The responses varied considerably. The most common definition of a late cancellation was "a trip that is canceled less than 1 hour before a scheduled trip" (cited by 24.4% of the 127 respondents), followed by "a trip that is canceled less than 2 hours before a scheduled trip (cited by 21.3%); 17.3% offered "other" definitions. Of the 22 "other" definitions, 9 were variations of previous day cancellation (e.g., "a trip that is canceled after 5 p.m. the day before the trip" or "a trip that is canceled after 5:00 p.m. the day before the scheduled trip and up to 2 hours before the pick up time"). Eight percent did not use the term "late cancellation" at all.

Excessive No-Shows and Late Cancellations

In open-ended questions, respondents were asked to define what they consider to be "excessive no-shows" and "excessive late cancellations." For the definitions, respondents were prompted to indicate the number or percentage of occurrences of no-shows or late cancellations during a specified period of time. Table 1 summarizes the usable responses from these two questions. The first column shows the number of occurrences, the second column indicates how many respondents gave that number of occurrences for their no-show definition, and the third column indicates how many respondents gave that number of occurrences for their late cancellation definition. Because these were open-ended questions (Questions 35 and 40), more than half of the respondents did not provide sufficient detail in their responses to complete the table or else they skipped the questions. A total of 64 respondents (47.8%) provided definitions of excessive no-shows and 47 respondents (35.1%) provided definitions of excessive late cancellations. These are the definitions that would typically trigger no-show or late cancellation penalties. The most frequent response for both definitions was

TABLE 1
DEFINITION OF EXCESSIVE NO-SHOWS AND LATE CANCELLATIONS

Occurrences	Excessive No-Shows Number (n = 64)	Excessive Late Cancels Number (n = 47)
2 in 7 days	1	1
3 in 14 days	—	1
2 in 30 days	3	2
3 in 30 days[a]	**28**	**8**
4 in 30 days	5	5
6 in 30 days[b]	**4**	6
8 in 30 days	—	1
9 in 30 days[c]	—	**1**
3 in 60 days	2	2
4 in 60 days	—	1
6 in 60 days	1	3
8 in 60 days	1	—
2 in 90 days	1	—
3 in 90 days	6	5
4 in 90 days	1	—
5 in 90 days	1	—
15 in 90 days	—	1
3 in 120 days	1	1
15 in 120 days	—	1
2 in 180 days[d]	**1**	**2**
3 in 180 days	1	1
4 in 180 days	1	—
5 in 180 days	1	—
6 in 180 days	2	1
7 in 180 days	—	1
8 in 180 days	2	2
15 in 180 days	1	—
30 in 365 days	—	1

NOTES: Question 35: Describe how "excessive no-shows" are defined (column 2). Question 40: Describe how "excessive late cancels" are defined (column 3).
[a]Most frequently cited definition for excessive no-shows and excessive late cancellations.
[b]Most "lenient" excessive no-show definition.
[c]Most "lenient" excessive late cancellation definition.
[d]Most "strict" excessive no-show and late cancellation definitions.

three occurrences in 30 days, cited by 28 respondents (44%) as a definition of excessive no-shows, which was also cited by 8 respondents (17%) as a definition of excessive late cancellations.

The most "lenient" policy definition of excessive no-shows was six occurring in 30 days (cited by 4 respondents) and the most lenient policy reported for defining excessive late cancels was 9 occurring in 30 days (cited by a single respondent). The strictest policies for defining both excessive no-shows and excessive late cancels was 2 occurring in 180 days, cited by 1 respondent (1.6%) for no-shows and 2 respondents (4.3%) for late cancellations.

Some respondents described definitions that did not fit readily into the categories show in Table 1. For example, one system uses a percentage-based system in which an agency defines excessive late cancellations as late canceling of 25% of the scheduled trips in 30 days. Similarly, another system has a more elaborate percentage-based system, as described here:

> [The transit agency] defines a Late Cancellation as canceling a trip within 30 minutes of its arrival time. Late cancels are considered as no-shows. [The transit agency] defines Same Day Cancellations as trips canceled on the same day of the trip greater than 30 minutes before the trips arrival time. Excessive is defined as: Twenty (20%) percent or more reservations a month with at least five (5) same-day cancellations in the month. For example, rider (A) canceled (same-day) 5 out of 20 trips in November. Rider (A) would have canceled 25% of their trips and had at least 5 same-day cancellations. Rider (A) would be considered excessive. While rider (B) canceled (same-day) 4 out of 10 trips in November. Rider (B) same-day canceled 40% (greater than 20%) but only canceled 4 (less than 5) trips. Rider (B) would not be considered excessive.

Several agencies described using point-based systems, which assign different point values to late cancellations and no-shows used to assess suspensions. For example, 18 points in a 30-day period equals a 15-day suspension, 36 points in a 60-day period equals a 30-day suspension, 54 points in a 120-day period equals a 90-day suspension, and 90 points in a 180-day period equals a 6-month suspension.

Beyond the Rider's Control

Additionally, respondents were asked whether the no-show/late cancellation policies included provisions for no-shows that were "beyond the rider's control." Of the 123 responding to the questions, 67 (54.5%) said "yes." Eighty-five (71.2%) went on to identify circumstances that would be considered beyond the rider's control.

- 49%—situations such as a family emergency or sudden illness that would affect the customer's ability to travel and contact the transit agency to cancel a trip;
- 38%—no-shows would be reviewed on a "case-by-case" or nonspecific basis;
- 8%—transit system errors such as a late vehicle or incorrect information that was not the fault of the customer; and
- 6%—issues related to no-shows were addressed in the appeals process.

As noted in chapter two of this synthesis report, a definition of beyond the rider's control is included in Appendix D of the U.S.DOT's ADA regulations and should be reflected in a transit agency's passenger no-show policies.

> A rider will not be considered a no-show if any of the following occurs: A. The vehicle arrived at the pick-up location early or late and the passenger was not ready, had left to call, or made other arrangements. B. A sudden family emergency caused the person to change plans and did not allow time to notify the dispatcher of this change. C. The person had made a reasonable effort to notify Metro that service would not be needed but experienced an unreasonable delay on the phones. D. A sudden turn for the worse for a passenger with a variable condition caused them to miss a trip (*Federal Register*, Vol. 56, No. 173, p. 45747).

No-Show and Late Cancellation Policies

Several questions were included in the survey to identify potential issues that might conflict with the regulations or recent regulatory guidance and interpretations provided by FTA. A summary of the survey results is provided in the following sections.

Written No-Show and Late Cancellation Policies

When asked whether transit agencies had written passenger no-show/late cancellation policies, 115 of the 123 respondents (91.3%) said "yes." Of those, 111 (90.2%) reported that their policies include suspensions for "excessive no-shows," 25 (20.3%) reported that their policies include fines for excessive no-shows, and 9 (7.3%) did not impose fines or suspensions for excessive no-shows (respondents could check more than one answer) (see Figure 12). In contrast, only 68 (56.2%) said they include suspensions for excessive late cancellations, 16 (13.2%) include fines for excessive late cancellations, and 49 (40.5%) do not impose fines or suspensions for excessive late cancellations (see Figure 13).

In follow-up questions, the survey asked respondents to describe their suspension and/or fine procedures for no-shows and late cancellations.

Transit agencies provided information about their suspension policies in response to an open-ended question. As a result, it was somewhat difficult to summarize the results. In general, however, it was noted that suspensions usually became longer as the number of no-show incidents increased. Of the 75 responses that indicated a suspension period for the first offense, 34 (45.3%) cited 30 days, 20 (26.7%) indicated a suspension period of 5 to 7 days, 18 (24.0%) a suspension period of 10 days to 2 weeks, and 3 (4.0%) other lengths of time (3 weeks, 90 days, and 180 days).

Fines and other fees are assessed in a variety of ways, sometimes for each trip, other times after one or more violations occur. In some cases, the transit agency indicated that it charged the fare for each no-show, either beginning with the first or third; others appeared to impose an amount that may not be directly tied to the fare or cost of the trip. Some examples of fines are listed here.

- A passenger is assessed a $9.00 fee for each no-show. Three or more unpaid no-shows will result in a suspension from service until the outstanding balance is paid in full.
- Full fare reimbursement for a no-show must be paid before service reinstatement. If a passenger pays the full fare reimbursement, he or she can be reinstated the same day. (Note: This is after a "courtesy" no-show is given to the passenger.)

33. Does your policy include suspensions or fines for excessive no shows? (check all that apply)

	Response Percent	Response Total
Fines	20.3%	25
Suspensions	**90.2%**	**111**
No	7.3%	9
Total Respondents		**123**
(skipped this question)		11

FIGURE 12 No-show policy penalties.

38. Does your policy include suspensions or fines for excessive late cancels? (check all that apply)

	Response Percent	Response Total
Fines	13.2%	16
Suspensions	**56.2%**	**68**
No	40.5%	49
Total Respondents		**121**
(skipped this question)		13

FIGURE 13 Late cancellation penalties.

- A $3.00 fee will apply to each no-show/late cancellation starting with the third one in the month. Suspension is considered after four or more in a month, or with a case-by-case review.
- Riders who accumulate five or more no-shows within the calendar year will be suspended from using the [service] until they pay the full cost of each no-show over four. In this instance, full cost of a one-way trip is the actual billing rate: as of January 1, 2004, the cost was $10.51 per trip. Once payment is made, service will be resumed. Each additional no-show will suspend service again until full payment is made for that no-show. Suspension of service will last until payment has been received.

One agency did describe an elaborate system for assessing fines and no-shows based on trip-making frequency:

> Fines: $5 per no-show, although payment is not currently enforced. Suspensions: 1–14 trips per month—a maximum of 2 no-shows per month, 15–39 trips per month—a maximum of 4 no-shows per month, 40–59 trips per month—a maximum of 6 no-shows per month, 60–79 trips per month—a maximum of 8 no-shows per month, 80–99 trips per month—a maximum of 10 no-shows per month, 100 or more trips per month—a maximum of 12 no-shows per month. 1st violation—letter of warning, 2nd violation—1-day suspension, 3rd violation—3-day suspension, 4th violation—7-day suspension of service, 5th violation—30-day suspension of service. Violation history covers a 6 month floating window.

It should be noted that the imposition of fines or other financial sanctions are not specifically addressed in the ADA regulations or in FTA compliance reviews or letters of findings to date.

Appeals Process

An open-ended question asked the survey respondents to describe their appeals process. A total of 112 agencies responded to the question. Of those, 53.6% described a formal appeals process mirroring the one described in the ADA regulations and 36.6% described a more informal appeals process primarily based within the transit agency without a formal hearing.

Advance Notification

Respondents were asked whether their policies included advance notifications or warnings before suspensions or fines were assessed (as required by U.S.DOT regulations). Of the 122 respondents, 88.3% said "yes." When asked to describe the procedures, approximately half reported that they send written notification in advance of a suspension or fine. Approximately one-third of the respondents indicated that they have a progressive policy that generally begins with a call or warning letter or postcard and then escalates until the suspension or fine is levied. Eleven of the respondents stated that they mail a postcard or letter after every no-show, and five use door hangers to notify passengers that they had been recorded as a no-show. One respondent noted that customers are required to call to confirm trips after accruing several no-shows within a short period of time.

Passenger Incentives

Agencies were asked to identify any incentive programs they had initiated that reward passengers who do not incur no-shows or late cancellations. Only five respondents reported that they provide incentives for passengers who do not incur no-show or late cancellation sanctions. The incentive programs include either forgiving past points assessed for late cancellations or no-shows or earning free ride coupons for not being assessed any penalties.

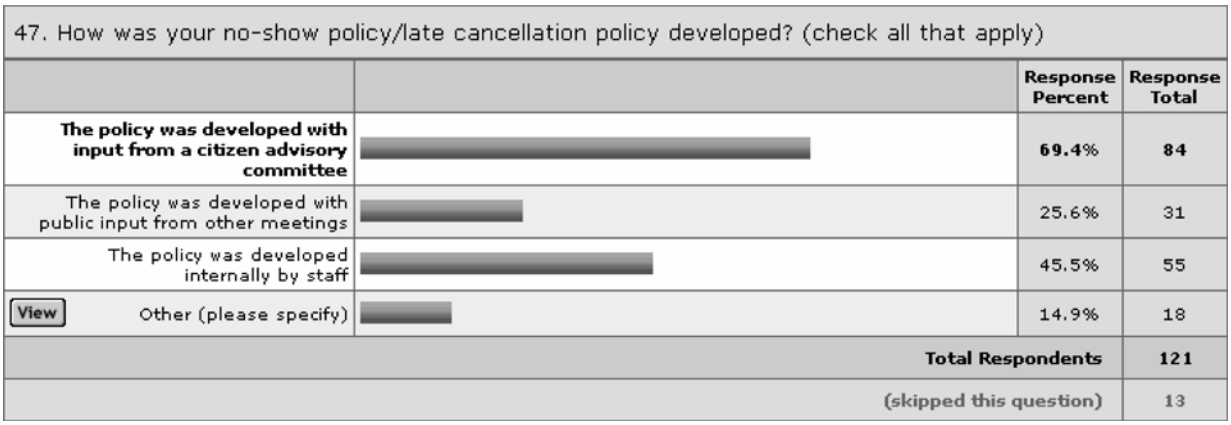
Policy Development

Respondents were asked to review which activities were undertaken during development of their no-show and late cancellation policies. ADA regulations require that the development of no-show policies include public input. Of the 121 transit agencies responding to the survey, 84 (69.4%) indicated that their policies were developed with input from their passenger advisory committees, 55 (45.5%) that their policies were developed internally with input from staff, and 31 (25.6%) that their policies were developed with public input from other meetings (see Figure 14). Respondents could select more than one response.

A cross-check was done to determine whether those who had checked "the policy was developed internally by staff" also used public input in formulating the policy. Of the 55 who responded, 56.4% also used their advisory committee for input, 29.1% used other meetings to gather public input, and 16.4% used "other" input. "Other" input included hiring a consultant, checking with peer transit agencies, and soliciting formal approval at their board of directors' meetings. More detailed examples of public input processes are described in chapter four.

Policy Implementation

Respondents were also asked how information about no-show and late cancellation policies is provided. Respondents could check as many answers as were applicable. Of the 124 agencies responding to this question, 99 (79.8%) indicated that the policy is described in rider brochures, 50 (40.3%) that the policy is described in the eligibility determination materials, 39 (31.5%) that the policy is described on the transit system's Internet website, and 35 (28.2%) that the policy is described in newsletters and/or passenger bulletins. "Other" reported methods of providing information varied from verbal discussions with dispatchers and drivers to providing additional



47. How was your no-show policy/late cancellation policy developed? (check all that apply)

	Response Percent	Response Total
The policy was developed with input from a citizen advisory committee	**69.4%**	**84**
The policy was developed with public input from other meetings	25.6%	31
The policy was developed internally by staff	45.5%	55
View Other (please specify)	14.9%	18
Total Respondents		**121**
(skipped this question)		13

FIGURE 14 Development of no-show/late cancellation policies.

written information in the no-show/late cancel suspension letter process (see Figure 15).

Policy Enforcement

Respondents were asked to indicate how much their no-show/late cancellation policies had been enforced during the past year. Of the 125 responding, 56 (44.8%) reported that the policy had been actively enforced, 39 (31.2%) that it had been enforced to some degree, and 18 (14.4%) that it had not been enforced at all (see Figure 16).

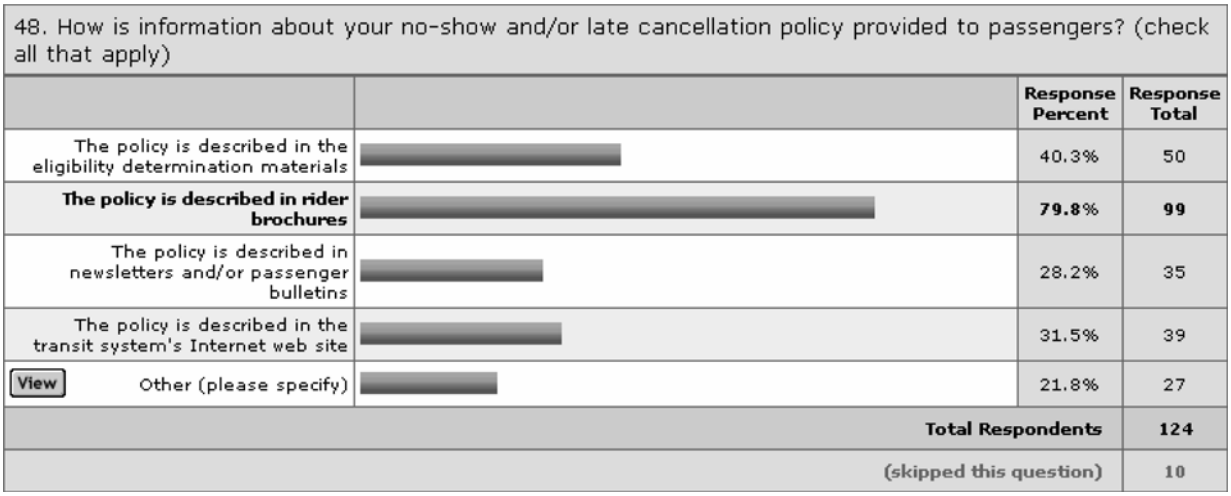
Personnel Practices Related to No-Shows and Late Cancellations

In this section, respondents were asked to describe the processes used by drivers, dispatchers, service monitors, and other personnel in the event of an apparent customer no-show, with most of the responses centering on drivers and dispatchers. Respondents also were asked whether contract operators are paid in the event of a passenger no-show and it is not the fault of the carrier.

Drivers

An open-ended question asked respondents to describe what procedures are followed by drivers (also called operators in some systems) in the event of an apparent passenger no-show. Of the 124 respondents, 91.1% indicated that drivers are to contact dispatch, either for instructions or to confirm the passenger no-show, before they proceed. Of those, 15.3% instruct the driver to leave the vehicle to look for passengers. Five respondents also mentioned leaving a door hanger or card to notify passengers that they had arrived for a pick-up. Six of the 74 systems that provide only curb-to-curb service indicated that they would instruct drivers to leave the vehicle to attempt to locate a passenger or leave a door hanger or card.

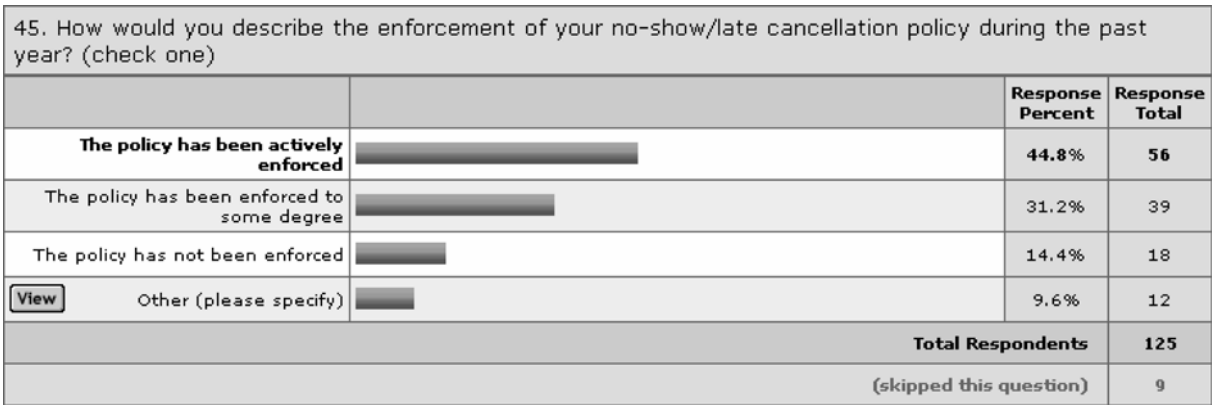
Most transit agencies indicated that drivers were instructed to wait 5 min before contacting dispatch for assistance,



48. How is information about your no-show and/or late cancellation policy provided to passengers? (check all that apply)

	Response Percent	Response Total
The policy is described in the eligibility determination materials	40.3%	50
The policy is described in rider brochures	**79.8%**	**99**
The policy is described in newsletters and/or passenger bulletins	28.2%	35
The policy is described in the transit system's Internet web site	31.5%	39
View Other (please specify)	21.8%	27
Total Respondents		**124**
(skipped this question)		10

FIGURE 15 Distribution of information about no-show/late cancellation policy.



45. How would you describe the enforcement of your no-show/late cancellation policy during the past year? (check one)

	Response Percent	Response Total
The policy has been actively enforced	44.8%	56
The policy has been enforced to some degree	31.2%	39
The policy has not been enforced	14.4%	18
View Other (please specify)	9.6%	12
Total Respondents		125
(skipped this question)		9

FIGURE 16 Enforcement of no-show/late cancellation policy.

although some drivers were instructed to call earlier. For example, "driver initially honks horn, at 2 minutes knocks on door, at 4 minutes radios dispatch." Another respondent provided a more detailed answer: "drivers must check that their time is correct, go to the passenger's door and knock, notify dispatch prior to leaving in case the client is on the phone, and give their arrival/departure times [to dispatch]." Several others also mentioned using MDTs or mobile data computers (MDCs) to contact dispatch in the event of an apparent no-show, which would record the no-show and time of the event. One respondent explicitly mentioned listing landmarks as a tool in recording no-shows to be sure the driver was in the correct location. In contrast, 8.1% did not explicitly cite contacting dispatch as a driver procedure.

Dispatchers

Of the 118 agencies that responded to this open-ended question, 53.4% indicated that they would attempt to contact the customer before instructing the driver to declare the passenger a no-show and move on. Only 14.4% specifically indicated that they would verify the time and/or location of the scheduled pick-up. Several said they would verify the driver's location using AVL. Another 37.3% stated that they would log the event and then instruct the driver to proceed without attempting to contact the passenger or taking other action. One respondent said it would cancel the return trip and three stated they would instruct the driver to leave a hang tag on the door alerting the passenger that the driver had been there to pick them up and the passenger could not be found. One respondent stated: "Use phone numbers to try and track down (passenger). If not successful, if leaving home, passenger will be marked as no-show. If going home, ride moved to 'will call' and no-showed if no call by days end."

Service Monitors

Twenty respondents answered this question. Almost half 9 (45.0%) of the service monitor personnel were involved in monitoring reports tracking patterns and high rates of no-shows for individuals. Other duties included investigating a location that is causing no-shows, mailing postcards or letters to customers advising them of the apparent no-show, or attempting to contact customers to verify their return trip for that day.

Other Personnel

Twenty-three respondents answered this question. "Other" personnel typically was interpreted to mean supervisors or no-show clerks. Most activities occurred after the no-show, not during the event. Also, most of the activities (70.0%) involve a supervisor monitoring no-show activities and issuing suspension notices as needed. The remaining activities related to supervisors or clerks contacting passengers to discuss the no-show or sending a card. One respondent commented: "Transit supervisor will call passenger if 'no-show' is determined to be within the control of the passenger. Supervisor will explain negative impact of 'no-show' on total system and attempt to inform (passenger)."

Contract Operators

Systems that use contract operators also were asked whether contractors were reimbursed for passenger no-shows. Of the 71 transit agencies answering this question, 63.4% reported that they do pay their contract operators for passenger no-shows. Most—59.6%—pay for trips on a per hour basis and 34.0% pay for trips on a per trip basis. Only 6.4% reported paying on a per mile basis.

Respondents also were asked whether the same or a different amount was paid for passenger no-shows that were not the fault of the contractor. Of the 59 respondents to this question, 71.2% indicated there was no difference in payment level, and 28.8% indicated that they paid contract operators less in the event of a passenger no-show. There were many variations in how payments were made. For example, some contract operators were paid a flat amount for passenger

no-shows, ranging from $1.00 to $12.00 per no-show; other payments were based on the fare.

No-Show and Late Cancellation Outcomes

Recording Late Trips and No-Shows

Respondents were asked whether a passenger would ever be considered a no-show if a driver arrived after the end of the pick-up window and the passenger could not be located. More than half of 132 respondents (54.2%) answered "no." However, 45.8% answered "yes" or "sometimes." Respondents who answered "yes" or "sometimes" were asked to describe the circumstances under which a passenger no-show would be declared when the driver arrived past the pick-up window. Most of the responses were variations of the explanation for what their no-show policies were *within* the stated pick-up window. However, several respondents indicated that riders were expected to wait an additional amount of time past the pick-up window or they would be considered a passenger no-show if the driver arrived late and they were not there. For example, one respondent stated: "any time the bus arrives and the passenger is not there, they are marked a no-show." Another expressed a similar interpretation: "When we are running outside the window we are calling the customer to communicate, they can cancel at that time. If they are not on location they are marked as a no-show." Others qualified the lateness within a 5- to 10-min time frame. For example, one respondent answered that "if passenger did not call 10 minutes after 30-minute pick-up window to state that ride is no longer needed, the ride would be a No-Show."

Another respondent clarified that a passenger no-show would be assessed if a rider had requested a same-day change to a requested pick-up time resulting in an extended pick-up window to accommodate the special request. If the passenger left during the extended pick-up window the customer would be considered a no-show. Similarly, another system said it would declare a passenger no-show "if we contacted passenger, informed them we were late and they agreed to wait—then didn't." Most of these answers appear to put the burden of the no-show on the individual rather than the transit agency that was late (or early).

Handling Return Trips

If the passenger's first trip of the day is a no-show, respondents were asked to describe how they handle any subsequent trips booked for that day. Of the 128 responding to this question, 38 (29.7%) indicated that they would leave the remaining trips on the schedule unless the customer called to cancel. Another 29 (22.7%) reported that the remaining trips would be automatically canceled, 25 (19.5%) would make an attempt to contact the customer and if there is no contact the trips are left on the schedule, and 22 (17.2%) stated that they attempt to contact the passenger, and if contact is not made the remaining trips will be canceled (see Figure 17).

As described in chapter two, FTA has provided guidance on scheduling and dispatching procedures related to rider no-shows. A letter of finding from February 2001, from FTA to a consumer, related to a complaint that a return ride was automatically canceled by the transit agency after the rider was recorded as a no-show on the "going" portion of the roundtrip, stated: "We find [the transit agency's] policy to cancel automatically a return trip if the rider was a 'no-show' for the first half of the trip not acceptable." In a follow-up letter from April 2001, to the transit agency, the FTA stated:

28. If a passenger is a no-show for the first trip of the day, what happens to any remaining trips booked for that day? (check the one that best describes your policy)

	Response Percent	Response Total
Remaining trips are automatically canceled	22.7%	29
Remaining trips are left on the schedule unless the customer calls to cancel	**29.7%**	**38**
An attempt is made to contact the customer and if s/he is not contacted, the remaining trips are canceled	17.2%	22
An attempt is made to contact the customer and if s/he is not contaced, the remaining trips are left on the schedule	19.5%	25
View Other (please specify)	10.9%	14
Total Respondents		**128**
(skipped this question)		6

FIGURE 17 Handling of return trips when the initial trip is a no-show.

"We ask that you take every step possible to ensure that an assumed 'no-show' is in fact an actual 'no-show' before canceling the return trip."

Using Slack Time Created by No-Shows and Late Cancellations

Transit agencies were asked whether they were able to reassign the slack time created by passenger no-shows or late cancellations. Of the 128 agencies responding to this question, 13.3% said "yes," they could use the time and 11.7% said "no," they could not make use of the opening in the schedule. Another 75.0% indicated that they sometimes are able to make use of the time. When asked how the time was used, responses could be divided into the following categories:

- Dispatchers reassign trips or allow drivers to catch up on schedule (55%).
- Use time for will calls, same-day service, or to clear wait list/unscheduled trips (29%).
- Breaks, reassign from taxi, assist other services in system (11%).
- Use late cancellation time but not no-show time to reassign trips (5%).

Some of the comments on the use of slack time are listed here:

- We use MDCs that enable immediate communication of trip changes as well as trip-by-trip updating of driver manifests, yielding improved scheduling decisions.
- We allow same-day calls on a space available basis, so if a passenger happens to call after a late cancellation and they are in the same area of town, we will pick them up soon rather than having them wait 1 to 2 h.
- Some of our contractors perform a second batch routing each day at approximately 11 a.m., because most no-shows and cancellations occur during the morning hours. In some cases, they can fill in these empty spots with the limited same day service that we offer.
- We use private contract companies to handle our overflow to avoid denying any rides. In cases of no-shows or cancellations, we pull rides from the contractors (if any) to fill the openings. In addition, our paratransit runs have variable on/off times, so we could pull rides from the end of one run to fill openings on other runs.
- With a no-show, no. With a late cancel, sometimes there is enough time available to insert a ride if there is a compatible same-day ride request.
- The system is "batched" several times before the actual day of service so late cancellations at least can be addressed in the scheduling process. No-shows on the day of service are simply lost time to the system.

Based on the comments, it appears that systems with more flexible scheduling and dispatching practices are more able and willing to use the slack time that may be opened up by late cancellations and sometimes no-shows.

SUMMARY

The survey respondents represent a broad cross section of transit agencies from very small to very large. The survey results provide information about how ADA complementary paratransit systems are managed and operated. The survey results provided insight into how ADA paratransit personnel and contractors are used to monitor and manage no-shows. Certain operating policies also were identified that might help to improve service efficiency and effectiveness, such as designating paratransit pick-up locations at large activity centers with multiple entrances (e.g., a hospital complex or mall). The responses also suggested that some systems are able (with assistance from some technological tools) to rearrange trips in real time and in response to late cancellations (in advance of the pick-up time), as well as with some no-shows.

The survey also provided insight about how ADA complementary paratransit no-show and late cancellation policies have been developed and implemented around the country. It has been suggested that some of the policies do not appear to be fully consistent with the ADA regulations or with recent FTA interpretations of the regulations, as described in chapter two. For example, some no-show policies appear to trigger suspensions after a relatively small number of passenger no-shows (e.g., three in 30 days). As reflected in the regulations and in recent ADA compliance reviews, such no-show policies do not demonstrate a pattern or practice of no-shows and are, therefore, unacceptable. The survey also revealed that some of the respondents mentioned that they automatically canceled any trips remaining on the schedule after a passenger is declared a no-show. As described in chapter two, FTA has indicated that automatically canceling a return trip is not acceptable and that agencies must "take every step possible to ensure that an assumed 'no-show' is in fact an actual 'no-show' before canceling the return trip."

CHAPTER FOUR

REVIEW OF NO-SHOW AND LATE CANCELLATION POLICIES

NO-SHOW AND LATE CANCELLATION POLICY OVERVIEW

As a supplement to the survey, respondents were asked to submit copies of their no-show and late cancellation policies, sample letters, and related materials. A total of 63 transit agencies provided no-show policies and/or supporting materials; 61 of the 63 were provided by transit agency survey respondents and 2 were from transit agencies that did not complete the survey.

These documents were used to clarify the policies described in the survey responses and to highlight innovative practices related to no-show/late cancellation policies and practices. Of particular interest were policies that appear to balance the needs of the transit agency to run an efficient operation with the needs of its customers to be able to access needed transportation. Particular attention was paid to identifying policies that incorporate incentives for passengers *not* to incur no-shows and late cancellations. Additionally, the policies were screened to ascertain whether they appeared to meet the ADA regulatory requirements for no-show policies and for consistency with FTA findings published in recent ADA complementary paratransit compliance reviews and letters of findings in response to no-show-related complaints.

The no-show and late cancellation policies were analyzed to identify innovative elements to highlight in this chapter. Transit agency representatives were contacted to elicit additional information, as needed. This information will be used in chapter five to identify elements that should be considered when developing a no-show/late cancellation policy.

The following elements are highlighted in this chapter:

- Passenger incentives
- Alternative approaches
- Technology as a tool
- Documentation and record keeping
- Beyond the rider's control
- Passenger information.

HIGHLIGHT 1: PASSENGER INCENTIVES

The U.S.DOT regulations implementing the ADA address the issue of no-show policies in ADA complementary paratransit service programs. Specifically, 49 CFR 37.125(h) states that

> The entity may establish an administrative process to suspend, for a reasonable period of time, the provision of complementary paratransit service to ADA paratransit eligible individuals who establish a pattern or practice of missing scheduled trips.

Several transit agencies provided no-show and late cancellation policies that included a reward system for passengers who do not incur no-shows/late cancellations during a certain period of time. The idea originated with the Regional Transportation Commission (RTC) of Southern Nevada based in Las Vegas, followed by Utah Transit Authority (UTA), based in Salt Lake City (both are discussed here). Other programs, including ACCESS Paratransit in Pittsburgh, Pennsylvania, and C-TRAN in Vancouver, Washington, also have passenger incentive programs.

RTC of Southern Nevada

In 1999, the RTC recognized that it was experiencing a problem with passengers booking five or six trips a day and then canceling them at the last minute. The system believed that it had a problem trying to balance its ADA requirement for no-trip denials with its public duty to operate an efficient transit system. The transit agency tried to incorporate FTA's concern about frequent versus infrequent riders when developing the policy, and it worked with its Citizens Advisory Committee to come up with a policy intended to balance the various concerns. It also wanted to provide a "good citizen incentive" to reward passengers who did not incur no-shows. Additionally, the agency focused on looking for patterns and practices of no-shows, not just occasional no-shows.

Under RTC's policy, after the first no-show the passenger is contacted by phone. At this time, the RTC will attempt to educate the person about its no-show policy. If the no-show was determined to be beyond the control of the passenger (e.g., they were in the hospital, there was a driver error, they were suddenly ill and unable to contact the RTC), then the no-show points will be reversed. Computer software has been developed to produce a letter for every no-show, so that passengers are made aware of no-show points assigned to them within a couple of days. From 1 to 5 penalty points are assessed, depending on how much advance notice is given for the cancellation or no-show. Suspension notices are sent

out mid-month, giving customers until the end of the month (14 days) to appeal.

Twice each year the RTC generates a report that shows how often passengers use the system and which passengers have not accumulated any no-show points. Free ride coupons are sent to those customers who have not accumulated any no-show points based on their frequency of use:

- Passengers who have zero no-shows and make an average of one round trip per week receive two free ride coupons.
- Passengers who make an average of three round trips per week with zero no-shows earn six free ride coupons.
- Passengers who make an average of 5 round trips per week with zero no-shows earn 10 free ride coupons.

The no-show policy was adopted in February 2000. According to the RTC, at the time program began, approximately 225 suspension notices were being issued each month; currently, 50 or 60 suspension notices are issued per month, with no-shows averaging approximately 2.5% of all scheduled trips. A total of 2,015 customers (49.4% of the 4,082 customers who made six or more trips in a 6-month period) qualified last year for no-show incentive passes, and a total of 8,990 passes were awarded.

UTA

In 2000, the UTA was experiencing a high volume of no-shows, and the transit agency was contemplating a fare increase to help offset escalating costs. The agency estimated that it was losing approximately $700,000 annually because of no-shows.

Since 2000, the UTA no-show policy has undergone three iterations. The initial policy was adopted in 2001 and was designed to emphasize a reduction in late cancellations, which were defined as cancellations occurring within 24 h of a scheduled trip. The Late Cancellation and No Show Policy 2001 was developed in consultation with the UTA Committee on Accessible Transportation. The 2001 policy did not result in significant change and it was believed that no service suspensions were given during that time.

In 2003, the UTA elected to develop a point system, based on the model developed by the RTC in Las Vegas. In addition to working with the Committee on Accessible Transportation, the UTA hosted 15 town meetings to discuss the proposed policy changes. The 2003 policy also included a Responsible Rider Program, which rewarded riders who had a minimum of six one-way trips in a 6-month period and who had a good ridership record. A "good ridership record" was defined as not having any no-shows on their record. The rewards were presented for three ridership levels:

- A "casual" rider who averaged one round trip per week was given bronze status and one free round trip.
- A "frequent" rider who averaged three round trips per week was given silver status and five free round trips.
- A "regular" rider who averaged four or more round trips per week was given gold status and a free monthly paratransit pass.

The 2003 policy was significantly different from the 2001 policy and is credited with achieving a 40% reduction in no-shows. In 2004, the UTA made some adjustments to its no-show policy in response to customer comments, but did not change the Responsible Rider Program. Another enhancement made in 2004 was to send free ride coupons to customers when the UTA missed a trip (defined as when the vehicle arrives 36 min or more after the agreed on pick-up time). The coupons can also be redeemed for the removal of no-show points. According to the UTA, this has proven to be a very successful program for customers, and the UTA has had the coupons used during the third step of the appeals process for removal of points that would have resulted in a service suspension.

The UTA no-show policy is described in the transit agency's eligibility determination materials, rider brochures, and in newsletters and passenger bulletins. Overall, it is believed that the 2004 policy is working well. In the first half of 2004 there were 51 Responsible Rider Program rewards. Of the registered riders, approximately 7% received service suspension notices and 4% were repeat violators. The overall no-show rate is approximately 1.3%; the combined no-show/late cancellation rate is approximately 3.0%.

HIGHLIGHT 2: ALTERNATIVE APPROACHES

In recent ADA compliance reviews, FTA suggested that transit agencies develop a method for relating the frequency of trip making to the calculation of no-show penalties and suspensions, but did not provide guidance on exactly what rate might be acceptable. For example, as described in chapter two, FTA commented in two ADA paratransit compliance reviews that their no-show policies should consider how frequently a passenger uses the service, rather than keying their policies to an absolute number.

In response to this finding, Tucson drafted a new no-show policy based on a point system, which was submitted to FTA in a quarterly progress report. However, in a December 2004 letter, FTA provided clarification of its request for corrective action and also pointed out that the severity of the suspension (1 year for missing as few as 11 trips) was not reasonable. In the meantime, the transit agency developed a revised draft policy, based on the percentage of trips resulting in no-shows. Although the agency did not submit a response to the survey the executive director of the ADA paratransit service did submit a copy of the revised draft no-show policy, which is described here. It should be noted that at the time this report was completed FTA had not commented on the revised draft

policy; therefore, it is not known whether the policy will be acceptable to FTA.

Background

The paratransit agency reported that the revised draft policy was developed to address customer no-shows that were creating problems in four areas:

> First, no-shows waste the time of the driver (by) traveling to a location when there is no customer waiting for the service. This wasted trip reduces the driver's productivity and inconveniences the rest of the passengers on that van.
>
> Second, such trips are a waste of taxpayers' funds. The average cost of one Van Tran trip is $24.18 (July 2004); therefore, the average no-show costs the taxpayers $24.18.
>
> Third, placing a trip on the schedule when the trip will not be used can interfere with the ability of other customers to book trips at a time they would prefer to travel.
>
> Fourth, a pattern of such trip bookings followed by no-shows both reveals a disregard for the service and encourages more disregard for the service and its clientele. This behavioral pattern encourages a practice of such trip bookings just in case they may be needed ('trip hoarding').

Draft No-Show Policy

The transit agency defines a no-show as occurring when all five of the following circumstances have occurred:

1. The customer (or the customer's representative) has scheduled ADA paratransit service.
2. There has been no call by the customer or his/her representative to cancel the scheduled trip two or more hours before the start of the pick-up window.
3. The paratransit vehicle has arrived at the scheduled pick-up point within the specified 25-min pick-up window.
4. The driver has waited at least two full minutes beyond the beginning of the 25-min pick-up window, but the customer has failed to board the vehicle.
5. The driver (while sitting in the driver's seat) cannot reasonably see the customer approaching the vehicle.

The transit agency defines a cancellation as occurring when the customer (or the customer's representative) calls and speaks to a paratransit reservation or dispatch staff member two or more hours before the beginning of the pick-up window and specifies that a scheduled trip is to be canceled.

The agency computer system keeps track of each trip a customer has requested, scheduled, taken, cancelled, and no-showed. When a no-show occurs, the computer will calculate the percentage of no-shows that have occurred in that customer's scheduled trips for the preceding 6 months. When the no-show percentage reaches 3%, the customer will be advised verbally of the no-show policy and a letter will be sent to the customer's residence with a copy of the policy enclosed.

When the no-show percentage reaches 5%, the customer will be issued a notice of a 3-day suspension of ADA paratransit service, subject to the appeals hearing process. With each successive no-show, the percentage will be recalculated. If the percentage is equal to or greater than 5%, each successive no-show (within 6 months of the last suspension) will result in the length of suspension as follows:

- Second occurrence—5 consecutive day suspension.
- Third occurrence—10 consecutive day suspension.
- Fourth occurrence—15 consecutive day suspension.
- Fifth occurrence—20 consecutive day suspension.
- Sixth occurrence—25 consecutive day suspension.

The agency will provide rides for a medical service appointment that occurs during any suspension period, but no additional ride(s) will be allowed.

Summary

The agency's policy is designed to identify those customers who have a pattern and practice of violating the no-show policy based on their frequency of use. All punitive or corrective measures are applied to those customers with a documented frequency of violations within the previous 6 months. No corrective action is applied to the infrequent violator; that is, one with no-shows of less than 5% of scheduled trips. The focal point of this policy is to first gain customer cooperation through education. Punitive measures are used only as a secondary measure and only when (1) educational efforts have failed to gain the needed cooperation, and (2) there is a sufficient pattern and practice of no-shows to cause an accumulated no-show rate of at least 5% within a 6-month period.

Few other systems mentioned using any type of percentage basis for considering no-shows. This was the only policy submitted for this study to include as detailed a description of its (draft) no-show policy based on frequency of use.

HIGHLIGHT 3: TECHNOLOGY AS A TOOL

ADA paratransit systems use a variety of technologies to enhance service provision, including handling gaps in schedules created as a result of no-shows and late cancellations. Based on comments from the survey and interviews with several transit agencies, it appears that there is a better chance of using the time resulting from a late cancellation than that from a no-show at the door. According to the survey responses, the most commonly used technology applications are computerized scheduling and dispatching (79.2%), AVL (28.0%), and MDTs (27.2%). Systems also were asked

an open-ended question about what technologies can be used to reduce the impact of no-shows and late cancellations. Many of the 83 responses described how MDTs and/or AVL can help expedite communications and provide information to dispatchers so that they can reassign trips to optimize routes. Many also described the ability to handle some same-day trip requests to fill slack time or simply using AVL to confirm the whereabouts of a driver in real time.

MDTs and AVL

From the survey responses and interviews, it appears that agencies that have MDTs and other technology tools believe that they are able to respond more quickly to reassign trips in the event of a no-show or late cancellation. In the survey, transit agencies were asked whether they were able to reassign the slack time created by passenger no-shows or late cancellations. Of the 128 responses to this question, 13.3% said "yes," they could use the time, and 11.7% said "no," they could not use the opening in the schedule. Another 75.0% indicated that they sometimes are able to make use of the time. When asked how the time was used, the responses could be divided into the following categories:

- 55%—enable dispatchers to reassign trips or allow drivers to catch up on schedule.
- 29%—use time for will calls, same-day service, or to clear wait list/unscheduled trips.
- 11%—use time for breaks, reassign from a taxi, or assist other services within the system.
- 5%—use late cancellation time but not no-show time to reassign trips.

The Spokane Transit Authority (STA) in Washington State has MDTs on its paratransit vehicles and for the past few years trip requests have been transmitted to drivers by means of these MDTs without using paper manifests. This approach provides greater flexibility, allowing dispatchers to make changes to schedules throughout the day. According to the paratransit manager, the STA is able to use excess capacity generated by no-shows and late cancellations because of this flexibility.

In addition, if a customer claims that he or she waited for a vehicle whereas the driver says the passenger was a no-show that information will be date and time stamped, when the driver reports the no-show. Because the location was captured as part of the trip disposition, the STA is able to determine whether the driver was in the right place at the right time or if the driver was not there and the passenger is correct.

The Metropolitan Transit Authority of Harris County (Houston Metro) has had a similar experience. According to the director of transportation programs, Houston Metro is able to use the capacity generated by cancellations and the nontraveled leg of a "no-ride" (i.e., no-show). Houston Metro encourages patrons to call the agency as soon as they realize they are not taking a trip, even if it is at the pick-up time; the theory being that cancellations and no-rides will generate excess capacity on routes, which is now available to dispatchers to handle same-day demand, sometimes called "unrouted" trips.

Houston Metro noted that it is important for the dispatch system to have direct control over the drivers. Some systems have decentralized dispatching or the schedules must go though a third party. Responding quickly to unrouted trips generated every few minutes in a large system such as Houston Metro's requires a same-day router to focus on the unrouted trips and a large enough dispatch staff to ensure that driver routes (trip times) are consistently updated throughout the day. Updated routes are critical to sound routing decisions. AVL is also invaluable for finding the closest vehicle to a waiting rider so that a trip can be assigned.

Interactive Voice Response

Interactive voice response (IVR) technology allows customers to use the keypad on their touch tone telephone to communicate with the computer's database to cancel a trip, check scheduled pick-up times, and book trips. A few transit agencies, including Dallas Area Rapid Transit (DART), Hillsborough Area Regional Transit (HARTline), and Niagara Frontier Transportation Authority (NFTA) in Buffalo use this technology.

DART has been using IVR technology for several years. Customers can book, cancel, and confirm trips. HARTline, in Tampa, is also phasing it in, because the IVR promises to be another tool for consumers to use at their convenience. The superintendent of paratransit reported that HARTline introduced IVR at the request of customers. It is credited with reducing telephone hold times. Also, customers may cancel and confirm reservations. HARTline is testing the potential to use IVR to make reservations. In that case, an individual would be able to select from a menu of 10 predetermined origins and destinations; 5 would be preset (such as home), the other 5 would be user defined. HARTline also uses an automated module that allows the IVR information to be automatically written into the computer file. NFTA indicated that it is using IVR for confirming and canceling trips. NFTA's dispatcher retrieves recorded messages left by means of IVR and incorporates the changes into the computer.

It should be noted that transit agencies using IVR must also provide an equivalent opportunity for individuals who cannot use the technology to perform the same functions. For example, someone who is deaf and uses a TTY (text telephone) or relay service cannot use IVR. Instead, they must contact an individual to make the request or leave a message on an answering machine (using the relay service)

during the same times that IVR technology is available to other customers.

HIGHLIGHT 4: DOCUMENTATION AND RECORD KEEPING

Most scheduling and dispatching software includes at least two mechanisms for capturing no-show and cancellation data: in real time using the dispatch screen or during trip verification using data entered from driver manifests. Data fields also can be user-defined to capture specific elements such as late cancellations. Some programs are able to differentiate between cancellations at the door (refusals) and a no-show or different timing cutoffs for different types of cancellations. Furthermore, software vendors have developed standard no-show/cancellation reports to capture basic trip data useful for tracking and managing no-shows and cancellations. These reports usually can be generated daily to capture information about which customers have incurred no-shows immediately following the event or monthly to provide summary statistics. Vendors are also developing suspension modules, which may be used to automatically track and assign suspensions, generate suspension letters, and reactivate suspensions once they have expired.

Ad hoc reporting is another option. Often users will download the data and import it into spreadsheets to create their own reports. The Whatcom Transportation Authority in Bellingham, Washington, uses an older commercial software program and is satisfied with it. Whatcom has developed a set of custom reports to manage its no-show policy, and actively collects and analyzes a variety of information about its passengers and their trip-making because it is helpful for understanding customer behavior. The system also actively supports regular communication with riders and the system's no-show literature encourages people to call to resolve no-show problems.

Specifically, Whatcom has developed a Definition of Status No-Show Tracking & Call Sheet for daily tracking and management of its no-shows. The form includes a column to indicate the reason for the no-show and whether Whatcom reversed the no-show after discussing it with the passenger. The form also indicates how many no-shows each customer has accumulated to date and whether a vehicle was sent back to pick-up the passenger after the apparent no-show. Space is provided to document the attempts made to contact the customer and who ultimately was reached to resolve the status of the no-show.

Whatcom also generates monthly reports to capture statistics about no-shows, including details on the number of follow-up calls made to discuss an apparent no-show, number of no-shows, number of warning letters, number of suspensions, etc. The form also includes a breakdown of the percentage of no-shows for nursing homes served by the program. That level of detail helps Whatcom to immediately identify problems that are agency-based so that they can be resolved promptly.

The manager of specialized transportation noted that "even if we get the call a minute before the driver shows up, we save time." For him, "no-shows are a cost of doing business." He reports that in the late 1990s, Whatcom experienced no-show rates of 5% to 6%. With the implementation of a new no-show policy, Whatcom's no-show rate is now approximately 1.5%, and very few suspension notices are issued each month.

HIGHLIGHT 5: BEYOND THE RIDER'S CONTROL

Section 37.125(h) of the ADA regulations states that transit systems must consider only missed trips (no-shows) that are within the control of the rider and must not count trips against passengers that are missed for reasons beyond the individual's control, which may include trips missed because of operator error. Specifically, 49 CFR 37.125(h)(1) states that

> Trips missed by the individual for reasons beyond his or her control (including, but not limited to, trips which are missed due to operator error) shall not be a basis for determining that such a pattern or practice exists.

A good example of clearly defining what is meant by "beyond the rider's control" has been adopted by King County Metro in Seattle.

King County Metro has developed a comprehensive ACCESS Program No-Show Policy and Administrative Procedures manual, which includes detailed information about how staff should handle no-shows and late cancellations. The manual includes eight sections: (1) cancellations, (2) suspension for rider no-shows, (3) flowchart of the process, (4) excuse procedures, (5) review process, (6) appeals process, (7) sample letters, and (8) passenger brochure. Of particular interest to this discussion is section 4 (reproduced here), how ACCESS handles no-show excuses. In particular, the policy is very clear under what circumstances a no-show is or is not to be excused.

> **No Shows or Cancels are EXCUSED when the trip is missed for the following reasons. Check the Excuse box on the Supplemental Data tab, and enter reason in Excuse Details, and your user name in Excused By.** (Categories are shown in **BOLD**.)
>
> The customer is **SICK.**
> **FAMILY** emergency: Death or illness of family member, or other family emergency.
> **MOBILITY AID** failed.
> **LATE** connecting transportation: late transfer trip, airplane, train, etc., caused the customer to miss the trip.
> **APPOINTMENT CANCELLED/DELAYED** for reasons not the customer's fault. Use also for site closures.

Adverse **WEATHER:** Snow, Extreme heat or Extreme cold.
ACTS OF GOD: Flood, earthquakes, etc.
STAFFING ERROR: The calltaker did not make all the cancellations the client requested; or customer just found out the ride was scheduled for the wrong day, time, or location or the customer thought he/she cancelled the ride using Rideline. My trip time was not changed, so I was not ready, and no one told me.
OTHER: Refer Customer to customer service.

No Shows or Cancels are NOT EXCUSED when the trip is missed for the following reasons:

Customer didn't want to travel today.
Customer changed their mind about using appointment.
Customer didn't know that he/she had a ride scheduled or was supposed to call to cancel.
Customer got another ride.
Customer told someone else he/she was not planning to travel (driver, facility, etc.) or someone else booked the ride for him/her.
Customer does not want to ride with specific driver or passenger, or on a specific vehicle.

King County Metro developed a procedure to properly code information about why customers were missing particular trips so that the transit agency could more accurately capture information about excused and nonexcused no-shows. The data are entered into the scheduling and dispatching software program. Although its software program has a suspension module, King County developed its own in-house process to manage no-shows and late cancellations and does not use that module. The program generates a letter for each no-show. The letter is then sent so that the customer knows a penalty is being assessed and to encourage them to call Metro ACCESS to discuss the status of their no-shows with agency staff.

The no-show policy has been enforced since 2002. Before the policy went into effect, Metro spent 4 months educating its customers about the policy, sent out letters, and included relevant information in its newsletter. In 2002, Metro had an 11% no-show rate for the first 7 months of the year; this rate dropped to 8% after the outreach effort. By 2004, the rates dropped to approximately 5.8% (that rate includes some trips that other systems might define as advance cancellations). King County does not require written documentation for excused no-shows, although staff does watch for a pattern of repeat excuses that may indicate a person is having repetitive problems.

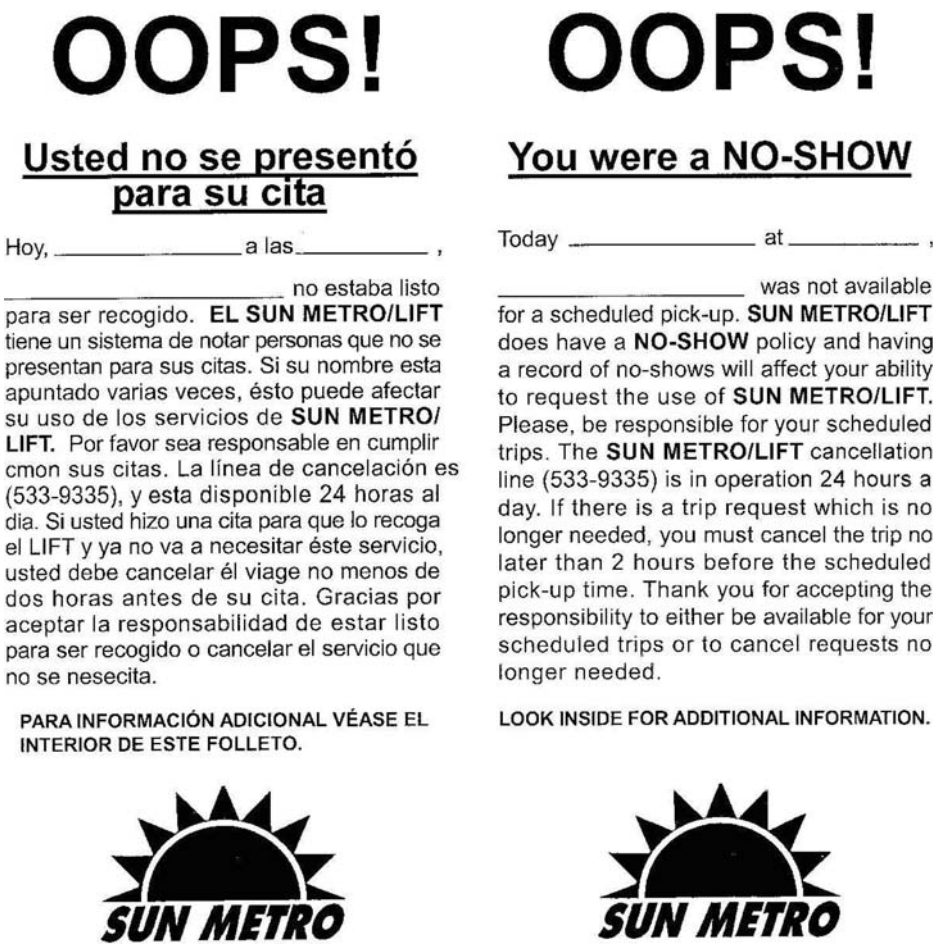


FIGURE 18 Sun Metro/LIFT door hanger for no-shows.

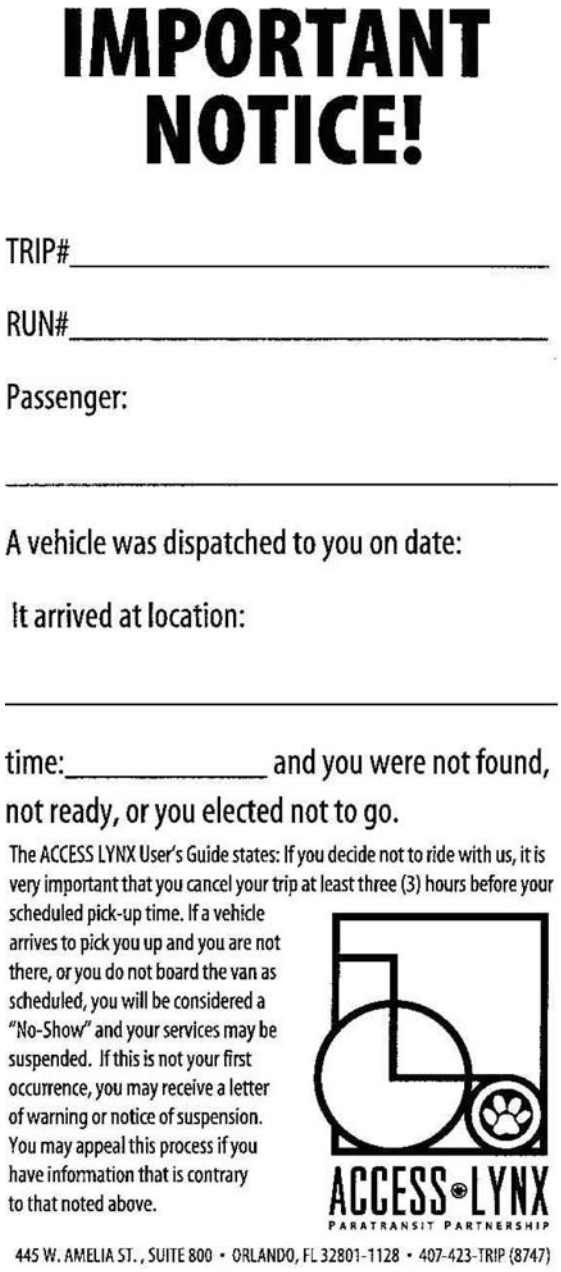
HIGHLIGHT 6: PASSENGER INFORMATION

The no-show policies included a variety of examples of passenger information including rider brochures, newsletters, passenger bulletins, and sample letters. The survey revealed that 79.8% (99 of 124) of the survey respondents provide information about their no-show/late cancellation policies in passenger brochures. Information about no-show policies was provided during the eligibility determination process by 50 (40.3%) of the respondents, 39 (31.5%) describe the policy on their Internet website, and 35 (28.2%) noted that they used passenger bulletins. Some systems also provide recorded information about their no-show policies during those times when customers are placed on hold; others include the policy with letters to customers advising them that they were a no-show or late cancellation.

During interviews, most paratransit managers stated that they were moving toward a system of contacting passengers after every no-show either by telephone or card or letter, to advise them a no-show had been recorded and to educate them about the policy. The RTC in Las Vegas, Whatcom, Spokane Transit, King County, NFTA, and the Regional Transportation Program in Portland, Maine, all contact passengers each day in the event of an apparent no-show. All stated that the primary purpose of the initial contact is to educate customers, especially new customers, so that they understand the problems associated with a passenger no-show.

Several transit agencies, including Sun Metro/LIFT in El Paso and the Central Florida Regional Transportation Authority (LYNX) in Orlando, reported that paratransit drivers leave a note or door hanger at the passenger's residence if on arrival the individual is an apparent no-show. Examples of two door hangers are shown in Figures 18 and 19. Both use bright orange paper for maximum visibility, and the Sun Metro/LIFT door hanger includes additional information about the no-show policy on the inside in both English and Spanish.

Another element that needs to be clearly documented is the appeals procedure. The UTA in Salt Lake City has documented a step-by-step appeals process for passengers to follow, which is provided with letters of suspension. The appeals process is included here.



IMPORTANT NOTICE!

TRIP#_____

RUN#_____

Passenger:

_____

A vehicle was dispatched to you on date:

It arrived at location:

_____

time:_____ and you were not found, not ready, or you elected not to go.

The ACCESS LYNX User's Guide states: If you decide not to ride with us, it is very important that you cancel your trip at least three (3) hours before your scheduled pick-up time. If a vehicle arrives to pick you up and you are not there, or you do not board the van as scheduled, you will be considered a "No-Show" and your services may be suspended. If this is not your first occurrence, you may receive a letter of warning or notice of suspension. You may appeal this process if you have information that is contrary to that noted above.

ACCESS•LYNX
PARATRANSIT PARTNERSHIP

445 W. AMELIA ST., SUITE 800 • ORLANDO, FL 32801-1128 • 407-423-TRIP (8747)

FIGURE 19 ACCESS LYNX door hanger for no-shows.

UTAH TRANSIT AUTHORITY
ADA PARATRANSIT
APPEALS PROCESS

(For Riders Who Choose to Appeal a Suspension)

STEPS MUST BE FOLLOWED IN ORDER LISTED BELOW OR YOU WILL LOSE THE OPPORTUNITY TO APPEAL THE SUSPENSION.

STEP #1

To appeal your service suspension, you must make either a verbal or written appeal of suspension to the Customer Support Administrator. This must be done within 7 calendar days after the date of the Letter of Suspension.

STEP #2

If you disagree with the decision made in Step #1, your appeal is sent for an automatic second review. This review will be made by the Riverside Division Manager. You will be notified in writing of the Division Manager's decision.

STEP #3

If you disagree with the decision made in Step #2, you may appeal that decision. To make your appeal, you must send a WRITTEN request to UTA's ADA Compliance Officer. Your written request for

appeal must be received by UTA within 5 calendar days after the date of the written decision in Step #2, from the Riverside Division Manager.

Contact Information:

Address:	Utah Transit Authority P.O. Box 30810 Salt Lake City, UT 84130-0810 Attention:	
Customer Support Administrator	Salt Lake Area	287-4672
	Toll Free	1-888-743-3882, ext. 4672
	Fax	287-4565
	TTY	287-4657
ADA Compliance Officer	Salt Lake Area	287-3536
	Toll Free	1-888-743-3882, ext. 3536
	FAX	287-4675

ALTERNATE FORMAT UPON REQUEST

SUMMARY

This chapter highlights examples of innovative practices identified from an examination of the no-show and late cancellation policies submitted by 63 transit agencies, supplemented by telephone interviews with paratransit managers at selected properties.

Instead of describing examples of no-show/late cancellation policies in their entirety, the policies were analyzed to highlight innovative practices in the following six categories: (1) passenger incentives, (2) alternative approaches, (3) technology as a tool, (4) documentation and record keeping, (5) beyond the rider's control, and (6) passenger information.

In chapter five, the findings of this project are synthesized into a list of those features to consider when developing no-show/late cancellation policies.

CHAPTER FIVE

FEATURES TO CONSIDER WHEN DEVELOPING NO-SHOW AND LATE CANCELLATION POLICIES

The following features of no-show and late cancellation policies are provided to assist agencies in setting up or evaluating their own programs and policies. These features were identified from the agency survey done for this synthesis and the review of the program description provided by transit agencies. The features are divided into three areas:

- Policy development,
- Policy content, and
- Policy implementation.

POLICY DEVELOPMENT

The following possible features of no-show/late cancellation policy development identified from agency survey results may assist transit agencies that are developing and reviewing their own policies.

- Establish a public process to review and comment on the no-show policy.
  - Educate customers and caregivers about the effect of customer no-shows and late cancellations and what they can do to minimize no-shows and cancellations.
- A "pattern or practice" of missed trips involves intentional, repeated, or regular incidents.
  - Review ADA regulations and FTA letters of finding for guidance.
  - Define when a late cancellation is considered the functional equivalent of a no-show.
  - Define a pattern or practice of no-shows (and late cancellations).
- Missed trips related to sudden emergencies that make it impracticable for riders to keep scheduled pick-ups or to call and cancel in a timely manner are to be considered "beyond the rider's control."
  - Review the ADA regulations for guidance.
  - Work with the public to develop a list of "excused" no-shows.
- Missed trips caused by scheduling errors or vehicles arriving late for pick-ups should not be held against the rider.
- Consider developing an alternative approach based on frequency of use rather than absolute numbers of no-shows and/or late cancellations.
- ADA paratransit eligibility and the administrative process used in imposing sanctions should provide adequate due process.
  - Before sanctions are imposed for no-shows and late cancellations, notify riders in writing and list, in detail, the no-shows that have been recorded against them.
  - Provide an informal hearing process for riders to dispute the no-shows recorded or to offer reasons that the missed trips were beyond their control.
  - Provide transportation to this hearing, if needed.
  - After this informal hearing, if sanctions are to be imposed, notify riders in writing of the sanctions and give the specific reason(s) for the decision.
  - Allow riders to request a formal appeal (under appeal procedures similar to those used when applicants are denied eligibility).
  - Continue access to the ADA complementary paratransit service through the hearing and appeal processes.
- Develop realistic expectations about passenger and driver behavior.
  - Educate customers about what drivers can and cannot do (e.g., wait time and on-time pick-up and drop-off windows).
  - Educate drivers about what is realistic to expect from passengers—especially passengers who may be developmentally disabled, vision impaired, or have other disabilities that make it difficult to use the system in the first place.
  - Understand that imposing sanctions on this population must be done with due process and concern for individuals who may rely on ADA paratransit as their only source of transportation.
- Determine the operational effect of late cancellations at various times to decide what would fairly constitute a late cancellation that is the functional equivalent of a no-show for a particular system.
- Identify the costs of various options for establishing a no-show/late cancellation policy.

  - Identify the cost of *not* establishing and enforcing a no-show/late cancellation policy to determine the benefits that will be realized.

POLICY CONTENT

The following possible features of no-show/late cancellation policy content may assist transit agencies when developing and reviewing their own policies.

- Incorporate a reasonable sanction for customers commensurate with the level of the no-show infraction.
  - Consider what length of suspension appears to be fair given the population served and the incidence of the no-shows and/or late cancellations.
  - Note that ADA regulations do not specify fines and other financial penalties as a remedy for excessive passenger no-shows.
  - FTA has indicated that it is not appropriate to publish a restrictive no-show policy even if it is not enforced.
- Include incentive programs such as free ride coupons for passengers with exemplary records (e.g., passengers who have zero no-shows during a 6-month period).
- Develop a manual of internal operating procedures for handling no-shows and late cancellations.
  - Record operating procedures particularly with respect to dispatch and drivers on how to declare an apparent passenger no-show (based on wait time, scheduled pick-up time versus actual arrival time, and so on).
  - Include detailed directions for contacting passengers.
  - Use positive not demeaning language.
- Include a written procedure for determining excused no-shows based on consistently applied criteria.
  - Communicate that procedure to passengers.
- Do not automatically cancel subsequent trips on the same day as an apparent passenger no-show.
  - Establish a procedure for determining whether the remaining trips will be taken.
  - Establish an internal procedure for identifying and handling those trips.
- Develop an appeals process that is consistent with ADA regulatory requirements as described previously.
  - Allow passengers to continue to use the service during the appeals process.
  - Provide an independent review board, such as the eligibility appeals board.
- Establish a way to monitor no-shows and late cancellations on an on-going basis and to impose suspensions at the appropriate time.
  - Use a software vendor's no-show/passenger suspension module.
  - Or create your own customized no-show/passenger suspension module.
- Include as much automation as possible for collecting information and generating notices to passengers about apparent no-shows on a regular—perhaps daily—basis.
  - Be sure staff keeps current and is able to educate passengers about the no-show policies.

POLICY IMPLEMENTATION

The following possible features of no-show/late cancellation policy implementation may assist transit agencies when developing and reviewing their own policies.

- Measure customer satisfaction of both those who could benefit by the reduction in the number of no-shows and late cancellations by the fellow customers and of those who have incurred excessive late cancellations and no-shows.
  - Make reasonable policy adjustments based on feedback from customers.
- Continue passenger education and outreach efforts.
  - Use door hangers to notify customers of a no-show.
  - Educate by means of passenger brochures, bulletins, and newsletters.
  - Pay particular attention to educating new customers who may not understand the issue of no-shows and late cancellations.
- Acquire technologies that will expedite the collection of accurate information and produce reports that facilitate analysis.
  - Acquire computer-assisted or automated scheduling and dispatching.
  - Use MDTs, AVLs, and other technologies.
  - Incorporate IVR and accessible on-line access to trip reservations, confirmations, and cancellations.
  - Employ smart cards for data collection and tracking passenger use of the system.
- Identify alternative ways for passengers to notify the transit agency about late cancellations, particularly after hours.
  - Answering machine.
  - Accessible on-line trip management.
  - IVR.
- Develop a means to collect good documentation based on a reliable, consistent method of recording no-shows and late cancellations.
  - Ensure that drivers accurately record their times and locations in the event of an apparent passenger no-show.
  - Ensure that late cancellations are handled quickly and efficiently to give the dispatcher time to make real-time schedule adjustments.
  - Encourage dispatchers to actively manage their drivers, particularly if they have access to AVL and MDTs, which allow for dynamic dispatching throughout the day.

- Contact passengers about apparent no-shows and late cancellations on a daily basis.
  - Research excused no-shows.
- Investigate operating failures to distinguish between passenger no-shows and carrier failures.
- Manage the appeals process established by the no-show policy.
- Document the actual costs of a no-show, trip refusal (at the door), late cancellation (and how it is defined), and advance cancellation (and how it is defined).
- Measure the cost of managing a no-show policy.

SUMMARY

Although most transit agencies would not be able to employ all of the ideas for no-show policies that are listed in this chapter, there are many items to consider and they are included here. This list is not meant to be exhaustive and may likely change over time as new interpretations and additional policy clarifications become available.

CHAPTER SIX

CONCLUSIONS

For most paratransit systems, periodic passenger no-shows and late cancellations are an expected cost of doing business. However, at a time when the cost of providing Americans with Disabilities Act of 1990 (ADA) complementary paratransit is increasing and all eligible demands for paratransit trips must be met, excessive no-shows and late cancellations can adversely affect the efficiency of service and prove to be costly. In response, many transit agencies have implemented policies to address no-shows and late cancellations. What has not been clear, however, are what impacts these various no-show and late cancellation policies have had on service efficiency, the mobility and the rights of riders, and whether they are in compliance with the ADA regulations and subsequent FTA interpretations.

The results of this regulatory review and survey of transit agencies in regard to no-show and late cancellation policies provides useful information about current policies and practices. Most of the focus of this synthesis is on how the requirements of the ADA regulations are addressed vis-à-vis no-show and late cancellation policies developed by transit agencies. For the purpose of this synthesis study, no-show/late cancellation policies were compared with the ADA regulations and evolving FTA guidance from recent ADA complementary paratransit compliance reviews and complaints filed with the FTA Office of Civil Rights. This concluding chapter reviews those issues and the concerns raised during this synthesis project and suggests future research needs.

Several definitional issues have been reported as having an impact on how no-show and late cancellation policies are structured, including what constitutes a "pattern or practice" of no-shows and what is considered an excusable no-show because it is "beyond the passenger's control." Although these terms are defined to some degree in the ADA regulatory language, the way in which these definitions have been put into practice can vary based on interpretation. The same is true for late cancellations.

As described in chapter two, the ADA allows entities to suspend service for a reasonable period of time if an individual establishes a pattern or practice of missing scheduled trips. Appendix D of Part 37 of the ADA provides additional regulatory guidance: "A pattern or practice involves intentional, repeated, or regular actions, not isolated, accidental, or singular incidents." A pattern or practice of no-shows and cancellations is established based on a threshold for what a transit agency considers "excessive no-shows."

Many transit systems have used 3 no-shows in a 30-day period as the definition of "excessive no-shows." However, FTA has stated that three no-shows in a 30-day period would not constitute a pattern or practice and that transit agencies should consider the frequency of use when defining excessive no-shows. FTA also stated that, because of the nature of the service and that many individuals may rely on ADA complementary paratransit for their transportation, the period of suspension should be appropriate to the infraction. However, FTA has not indicated what period of suspension would be acceptable.

Another concept that has been defined in the ADA regulations, but applied in different ways by transit agencies, relates to excusing passenger missed trips (no-shows) that are "beyond the passenger's control." This concept is addressed in the Appendix D regulatory guidance for Section 37 of the ADA. That guidance states that only actions within the control of the passenger can be counted as part of a pattern or practice of no-shows. These events that should not be counted against the passenger might include operator error (such as a late trip or carrier missed trip), a sudden turn for the worse in someone with a variable condition (e.g., multiple sclerosis), or a sudden family emergency that makes it impracticable for the individual to travel at the scheduled time or for the individual to notify the entity in time to cancel the trip before the vehicle comes.

Many transit agencies take into account no-shows that are beyond the passenger's control when establishing a determination of excessive no-shows. Some mirror the ADA language, whereas others leave resolution of the issue to the appeals process. Some transit agencies charge a no-show against a passenger even if the vehicle was late and the passenger had left or decided not to take the trip without notifying the transit agency.

The ADA makes reference to no-shows, but not to cancellations. Nonetheless, transit agencies have begun to consider late cancellations as problematic and have started to incorporate them into their no-show policies. The survey and policy review indicated that there is wide variation in how transit agencies define terms relating to no-shows and various types

of cancellations, particularly late cancellations, which are of specific interest to this synthesis.

Although it is true that late cancellations made close to the actual time of the scheduled pick-up can affect service delivery and waste time and resources, how late cancellations are defined by an individual transit agency will affect how they impact paratransit operations. Some transit agencies use a definition of late cancellations as occurring 1 to 2 h before the scheduled pick-up, believing that resources are already committed to providing that trip. Other agencies do not see it as a problem, because they can always shift trips, fill holes, and add vehicles that are in the unscheduled file. The survey does show that dispatchers are sometimes able to make use of the slack time created by late cancellations to reassign trips, keep the schedule on time, and create driver breaks. New technologies are aiding in this effort and making it easier for dispatchers to reassign trips in real time.

Some transit agencies have defined a late cancellation as any made after 5 p.m. (or 10 p.m. in some cases) the day before a trip is scheduled, noting that they have in effect lost the ability to provide another trip in that time slot because the reservations process is closed and schedules are complete at that time. As a result, customers could be penalized for canceling trips after 5 p.m. the day before the trip is scheduled even if it is still many hours in advance of the scheduled pick-up time. FTA has gone on the record as saying that defining late cancellations in this way is "unreasonable" and has encouraged systems to reconsider that approach. Other transit agencies indicated that a cancellation that is many hours in advance of a trip is sufficient notice, having little effect on system operations because such occurrences are generally expected.

Several of the transit agencies interviewed for this report indicated that their no-show policies grew out of a need to address the issue of passengers making extra reservations and then canceling most of them at the last minute after deciding which trips to actually make (i.e., trip hoarding). This practice could be related to concerns on the part of passengers that there may be capacity constraints and that they may not get the trip they requested; therefore, they hoard trips until they know exactly what they want to do.

In practice, other transit agencies have taken measures to reduce excessive advance cancellations by shortening the number of days in advance in which rides may be scheduled (e.g., reducing the maximum reservation time from 14 days in advance to 7 days in advance). One transit agency reported that it has a no-show/cancellation policy that incorporates penalties for so-called early cancellations, which are made while reservations are still being accepted for that time period. In that case, a 7-day suspension is given when 50% or more of the trips in a given month are canceled in advance during a 30-day period (based on a minimum of eight trips). The ADA does not specifically address penalizing passengers for making advance cancellations.

Other agencies have addressed the issue of excessive early cancellations by ensuring that there are no trip denials, which makes individuals relatively certain that they will get the trip they want without having to reserve it well in advance.

As described in chapter two, FTA has taken a position that in the event of an apparent passenger no-show, remaining trips for that day are not to be automatically canceled and the transit agencies "take every step possible to ensure that an assumed 'no-show' is an actual 'no-show' before canceling the return trip." However, to date FTA has not provided guidance on what it would consider "every step possible."

ADA paratransit systems use a variety of technologies to enhance service provision, including handling gaps in schedules created as a result of no-shows and late cancellations. Based on comments from the survey and interviews with several transit agencies, it appears that there is a better chance of using the time resulting from a late cancellation than from a no-show at the door. According to the survey responses, the most commonly used technology applications are computerized scheduling and dispatching (79.2%), automatic vehicle location (AVL) (28.0%), and mobile data terminals (27.2%). With recent advances in scheduling and dispatching and the integration of AVL and mobile data terminals, many of the concerns with the timing of late cancellations and no-shows may improve somewhat as trips are more easily transferred among drivers based on real-time knowledge.

In addition to providing enhanced capabilities for the transit agency, an added benefit of technology is that it helps to give the rider more information, such as when a vehicle is coming and time saved in booking and canceling trips. However, as pointed out in the case studies, it is important for the dispatchers to have direct control over the drivers. Some systems have decentralized dispatching or the schedules must go though a third party. Responding quickly to unrouted trips generated every few minutes in a large system requires a same-day scheduler or router to focus on the unrouted trips and a large enough dispatch staff to ensure that driver routes (trip times) are consistently updated throughout the day. Updated routes are critical to sound routing decisions. AVL is also invaluable for finding the closest vehicle to a waiting rider so that a trip can be assigned. The name of the game is balance, achieved through flexibility and effective communication to driver and patrons.

Interactive voice response (IVR) allows customers to use the keypad on their touch tone telephone to communicate with the computer's database to cancel trips, check scheduled pick-up times, and book trips during any hour of the day or night. Dallas Area Rapid Transit has been using this technology for several years. Both Hillsborough Area Regional Transit in Tampa, Florida, and Niagara Frontier Transporta-

tion Authority in Buffalo, New York, are in the process of phasing in IVR. Hillsborough Area Regional Transit also mentioned that it cuts down on telephone hold time. IVR promises to be another tool for consumers to use at their convenience.

Several transit agencies have adopted point-based no-show policies, which sometimes include a reward system for passengers who do not incur no-shows during a certain period of time (e.g., 6 months). The idea originated with the Regional Transportation Commission of Southern Nevada in Las Vegas. Several other agencies have followed suit, including the Utah Transit Authority. Points for late cancellations are valued at less than the points for no-shows, and penalties are assessed based on the point system. To date, FTA has not commented on a transit system that uses a point-based system.

Under an incentive program, several agencies offer free ride coupons or passes to passengers based on their having not accumulated no-show points during a specified period of time (typically 6 months). The Utah Transit Authority also gives free ride coupons to passengers when there is a carrier failure and the carrier misses the trip. They may be redeemed to erase no-show points as well.

An important aspect of any no-show/late cancellation policy is conveying information about the policy and receiving feedback from customers and the community. In reviewing the policies and discussion of customer interaction with transit agencies, it was suggested that policies be developed that are (1) easy to understand, (2) reasonable, and (3) fairly administered.

Several of the systems interviewed emphasized the need to educate their customers before enforcing their no-show policies. Town hall meetings were used by some transit agencies. Letters or postcards that are automatically generated for each no-show are one tool that many systems are starting to use to initiate a dialogue defining why a trip was designated as a no-show. Some systems also leave a door hanger notifying the passenger that the driver was there and that the trip was no-showed. Passengers are typically invited to contact the agency to resolve any transportation problems. Telephone calls to customers can also provide good information and education about no-show policies. One system mentioned that it is often a new passenger who is a no-show, one who may not understand the rules. One transit system has developed a detailed telephone log sheet to record the attempts to call each no-show and the outcome of that call.

Reviewing various no-show policies and ADA regulations and FTA findings helps to identify what no-show/late cancellation policies should not include (e.g., policies that apply unreasonable no-show requirements such as three no-shows in 30 days), as well as what they should include (e.g., information about excused no-shows and the appeals process). At the same time, it is unlikely that a one size fits all approach and specific operational requirements may work everywhere.

There will always be a small percentage of passengers who abuse the system and generate no-shows and late cancellations without regard to its effect on fellow passengers or the transit agency. On the other hand, passengers with occasional no-shows may simply require a gentle reminder or ongoing education about how to anticipate and report no-shows and late cancellations. At the same time, this synthesis has identified potential concerns including definitional issues, the impacts associated with developing no-show policies (particularly the definition of excessive no-shows/late cancellations and the magnitude of the penalties associated with them), outreach and public education efforts, and issues with record keeping and consistently applying no-show policies.

Now that a baseline has been developed to describe how transit agencies are currently managing their no-shows and late cancellations, it might be helpful to work with several transit agencies of varying sizes to develop several model no-show and late cancellation policies that are compliant with ADA regulations and that permit the transit agencies to manage their no-shows in a fair and effective manner. Specifically, the research could be used to answer the following questions:

- What constitutes an “ideal” no-show policy and how would it be implemented?
- What is the cost of managing a proactive no-show/late cancellation program?
- What is the expected financial and operating payoff of closely managing no-shows and late cancellations?

This synthesis project has gone a long way toward answering the first question, although stopping short of naming “ideal” or “best” practices. The report suggests that a comprehensive no-show program requires:

- Realistic expectations of riders and drivers;
- Consistently applied operating procedures, particularly with respect to dispatch and drivers declaring an apparent passenger no-show;
- A means for passengers to cancel trips as far in advance as possible, including during times when the agency may not be open for business;
- Good documentation based on a reliable, consistent method of recording no-shows and late cancellations;
- Effective computer programs that capture accurate information and produce reports that facilitate analysis;
- A system for sending letters to notify passengers about no-shows on a regular—perhaps daily—basis;
- An effective process for determining excused no-shows based on consistently applied criteria;
- A way to monitor no-shows and late cancellations on an ongoing basis and to impose suspensions at the appropriate time;

- Appropriate technological tools such as computerized scheduling and dispatching, along with AVL and other technologies to manage no-shows and late cancellations;
- Public outreach to solicit input and educate passengers and their caregivers about the negative effect of no-shows and late cancellations; and
- A recognition that imposing sanctions on this population must be done with due process and concern for individuals who may rely on ADA paratransit as their only source of transportation.

The cost of managing a proactive no-show policy could be significant and was not specifically identified in this report. The reaction of some managers to preliminary results of about the study findings raised concerns about how expensive it would be to implement a no-show policy with all of the elements described here. In particular, staff time would be needed to

- Run reports,
- Analyze results,
- Contact passengers about apparent no-shows and late cancellations on a daily basis,
- Research excused no-shows,
- Investigate operating failures to distinguish between passenger no-shows and carrier failures, and
- Manage the appeals process.

To determine the effectiveness of a no-show program, transit agencies need to be able to

- Document the actual costs of a no-show, trip refusal (at the door), late cancellation (and how it is defined), and advance cancellation (and how it is defined);
- Determine the operational effect of late cancellations at various times to decide what would fairly constitute a late cancellation that is the operational equivalent of a no-show for a particular system;
- Measure the cost of managing a no-show policy; and
- Measure customer satisfaction—both of customers who should benefit by a reduction in no-shows and late cancellations by their fellow customers and of customers who have incurred excessive late cancellations and no-shows.

The effective of system size would be an important component to include, as well as any cost differences between no-show policies that are administered in-house by the transit agency or externally by a contractor or broker. This type of detailed cost information could help a transit agency decide how comprehensive a no-show policy to implement and where to trade off the cost of managing a program versus the cost of running a service with a reasonable level of no-shows and late cancellations.

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GLOSSARY

The following terms are commonly found when dealing with ADA complementary paratransit services. The definitions are drawn from various sources including the Community Transportation Association of America, FTA, TCRP, and National Transit Institute.

ADA (Americans with Disabilities Act)—Passed by the U.S. Congress in 1990, this act mandates equal opportunities for persons with disabilities in the areas of employment, transportation, communications, and public accommodations. Under this act, most transportation providers are obliged to purchase lift-equipped vehicles for their fixed-route services and must ensure system-wide accessibility of their demand-responsive services to persons with disabilities. Public transit providers also must supplement their fixed-route services with paratransit services for those persons unable to use fixed-route service because of their disability.

ADA complementary paratransit or ADA paratransit—Paratransit service that is required as part of the Americans with Disabilities Act of 1990 (ADA), which complements, or is in addition to, already available fixed-route transit service. ADA complementary paratransit services must meet a series of criteria outlined in the U.S.DOT implementing regulations.

Advance reservation—A service request for a single trip to occur at a specified later time; same as a random request or demand request. For ADA complementary paratransit service, advance reservations must be accepted at least 1 day in advance of the trip.

Automatic vehicle location (AVL)—An electronic communications system for tracking and reporting the location of vehicles to a central dispatching center.

Batch scheduling—The practice of scheduling trips after some or all of the reservations have been received.

Cancellation—An event where the customer who has previously requested service contacts the transit agency to cancel the request before vehicle arrival. Some systems also define and count late cancellations, defined in various ways.

Capacity constraints—Defined by the U.S.DOT regulations implementing the ADA as being policies or practices that significantly limit or constrain the availability of ADA paratransit service. Examples include trip priorities, waiting lists, or an operational pattern or practice resulting in a substantial number of untimely pick-ups, excessively long trips, trip denials, or carrier missed trips.

Curb-to-curb service—A common designation for paratransit services. The transit vehicle picks up and discharges passengers at the curb or driveway in front of the customer's home or destination.

Demand-response service—Where individual passengers can request transportation from a specific location to another specific location at a certain time. Transit vehicles providing demand-response service do not follow a fixed route, but travel throughout the community transporting passengers according to their specific requests. May also be called dial-a-ride. These services usually, but not always, require advance reservations.

Denial—A trip that cannot be accommodated because of inadequate system capacity. (A denial does not include ineligible trip requests.) For ADA paratransit, a "capacity denial" is specifically defined as occurring if a trip cannot be accommodated within the negotiated pick-up window. Even if a trip is provided, if it is scheduled outside the +60/−60-min window, it is considered a denial. If the passenger refuses to accept a trip offered within the +60/−60-min pick-up window, it is considered a refusal not a capacity denial.

Door-through-door service—A higher level of service than door-to-door in which the driver actually provides assistance from inside the origin to inside the destination.

Door-to-door service—A form of paratransit service that includes passenger assistance between the vehicle and the door of his or her home or other destination.

Dynamic dispatch—The practice of transferring trips from one vehicle to another or inserting trips in vehicle manifests based on real-time information during the service day.

Interactive Voice Response (IVR)—This is a telephone-based technology in which someone uses a touch tone telephone to interact with a database to acquire or enter data into the database. IVR typically uses the keypad and menu-driven responses.

Missed trip—Occurs when a carrier fails to pick up a passenger. A missed trip also may be declared when a vehicle arrives so late that the passenger will not arrive at his or her destination at a reasonable time (e.g., causing a passenger to miss a doctor's appointment).

Mobile data terminal (MDT)—An in-vehicle piece of equipment that receives and sends digital messages and

displays messages on a screen. Sometimes called a mobile data computer or MDC.

Negotiated pick-up time—The agreed on or negotiated pick-up time that is offered by the call taker and agreed to by the customer after a request has been placed and availability checked. In ADA paratransit service, the regulations allow a 60-min negotiated pick-up time before and after the requested pick-up time, with consideration given for the applicant's appointment or schedule.

No-show—A passenger scheduled for a demand-response trip does not appear at the designated pick-up point and time and does not cancel the trip in advance.

On-time pick-up window—The period (typically defined around the agreed on pick-up time) when customers are to be ready for pick-up and the period within which drivers can arrive and be considered on time. This window also will define the maximum change in time between the agreed on and scheduled pick-up times that can be made without notifying the customer.

Paratransit—Types of passenger transportation that are more flexible than conventional fixed-route transit, but more structured than the use of private automobiles. Paratransit includes demand-response transportation services, subscription bus services, shared-ride taxis, car pooling and vanpooling, jitney services, and so on.

Real-time scheduling—The practice of scheduling a trip at the time the trip request/reservation is received.

Refusal—This occurs when a passenger refuses a trip that is offered and is considered responsive to the original request (for ADA paratransit service, this would be within the allowed negotiated pick-up window).

Scheduled pick-up time—The pick-up time indicated by the scheduler; if scheduling changes are made after the customer has placed a request, the actual scheduled pick-up time may vary slightly from the negotiated on pick-up time as long as it does not violate the on-time pick-up window.

Shared ride—Multiloading individual passengers on the same vehicle.

Slack time—The available time in a vehicle schedule between a passenger drop-off and pick-up. Sometimes slack time is built into a schedule to accommodate anticipated additions or changes.

Subscription service—Repetitive service provided by advance reservations for the same trip, at the same time and day of travel over an extended period (often weeks or months). Sometimes referred to as "standing order service."

Trip—A one-way movement of a person or vehicle between two points.

Vehicle wait time—The maximum time that drivers are required to wait for customers after they have arrived. Typically, the wait time does not start until the beginning of the on-time performance window.

Will call—A will call or call when ready are terms for return trip requests that are not scheduled at the same time as the going trip.

APPENDIX A

Survey Questionnaire

[Note: The on-line survey was conducted using SurveyMonkey. Some questions in the print version were numbered and formatted differently; however, the order and content are the same.]

TRANSIT COOPERATIVE RESEARCH PROGRAM
SYNTHESIS PROJECT J-7, TOPIC SB-11

PRACTICES IN LATE CANCELLATION/NO-SHOW POLICIES FOR ADA PARATRANSIT

Survey Questionnaire for ADA Paratransit Manager or ADA Coordinator

Purpose: The objective of this synthesis is to document current policies and practices of U.S. public transit agencies concerning passenger late cancellations and no-shows for ADA complementary paratransit service. The synthesis will survey transit agencies based on a list provided by the American Public Transportation Association (APTA). For the purposes of this study, ADA paratransit is defined as "comparable transportation services that must be provided for individuals with disabilities who are unable to use fixed route systems," in accordance with the requirements of the Americans with Disabilities Act of 1990 (ADA). The final results will be summarized in a report that will be available from the Transportation Research Board (TRB). You can learn more about the project at http://www4.nas.edu/trb/synthsis.nsf/All+Projects/Synthesis+SB-11.

Special Note: The survey is being provided in an on-line format through "SurveyMonkey." If respondents are unable to complete the survey on-line, they may contact the project manager to obtain a paper copy or complete it via telephone interview.

Submission Instructions

Please complete the online survey by **Friday, November 19, 2004,** following the instructions provided on the transmittal e-mail. We also are asking you to provide copies of your written no-show/late cancellation policies, as well as any public information you provide to customers (including sample letters). Please e-mail or mail them to the project manager at the address below.

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I. System and Contact Information

Name of transit agency: _____
Address: _____
City: _____ State: _____ Zip code: _____
Contact person: _____
Title: _____
Phone: (_____) _____-_____ Fax: (_____) _____-_____
E-mail address: _____

II. Reservations and Scheduling

1. Please indicate what types of paratransit services are provided by your transit agency: (check one).
   - ☐ ADA complementary paratransit only
   - ☐ ADA complementary paratransit service AND other paratransit services provided using the SAME vehicles
   - ☐ ADA complementary paratransit service AND other paratransit services provided using DIFFERENT vehicles

   Please answer all remaining questions with respect to ADA complementary paratransit service only.

2. Which of the following best describes the trip reservation and scheduling process for your ADA complementary paratransit service for initial reservations (not will call/call when ready trips)? (Check one.)
   - ☐ Trip requests are taken 1 or more days in advance and scheduled with customer on the phone
   - ☐ Trip requests are taken 1 or more days in advance and then batch scheduled later
   - ☐ Trip requests are taken and then same-day dispatched (real-time scheduling)
   - ☐ Other (please describe): _____

   _____

   _____

3. What is the maximum number of days in advance that trip requests can be made? (Check one.)
   - ☐ same day
   - ☐ 1 day
   - ☐ 3 days
   - ☐ 5 days
   - ☐ 7 days
   - ☐ 14 days
   - ☐ more than 14 days
   - ☐ other (describe)

   _____

4. What is the normal cutoff time to place a reservation? (Check one.)
   - ☐ Same day
   - ☐ 4 p.m. day before trip is scheduled
   - ☐ 5 p.m. day before trip is scheduled
   - ☐ 6 p.m. day before trip is scheduled
   - ☐ Other (describe): _____

   _____

5. As part of the reservations process, are passengers routinely called back to confirm their scheduled pick-up times?
   ☐ Yes ☐ No
   If yes, please describe the process: _____

   _____

   _____

6. Does your system allow "will calls"/ "call when ready" requests for return trips when the passenger is not sure when she/he will be done? ☐ Yes ☐ No

7. How is your pick-up window defined? (e.g., 15 minutes before to 15 minutes after negotiated pick-up time)
   ☐ Not applicable
   _____ minutes BEFORE negotiated pick-up time to _____ minutes AFTER negotiated pick-up

8. Has your system established designated paratransit pick-up locations at large facilities (such as hospitals or shopping malls)?
   - ☐ Yes, we have designated pick-up locations WITH signs
   - ☐ Yes, we have designated pick-up locations WITHOUT signs
   - ☐ No, customers may request any pick-up location in the service area
   - ☐ Other

9. How long are drivers required to wait for a passenger at the pick-up location assuming the driver arrives WITHIN the stated pick-up window? (e.g., 5 minutes, 3 minutes)
   Driver must wait _____ minutes ☐ Not applicable

10. If a driver arrives after the end of the pick-up window and the passenger cannot be located, would a passenger be considered a no-show?
    ☐ Yes ☐ No ☐ Sometimes
    If so, please describe circumstances: _____
    _____
    _____

III. No-Shows and Cancellations

Please define the following terms as they are used by your system. If you do not use a particular term, please indicate that it is not applicable.

11. An "Advance Cancellation" is defined as (select the one answer that best reflects your system):
    a. a trip that is canceled more than ____ HOURS before a scheduled trip
    b. a trip that is canceled more than ____ DAYS before a scheduled trip
    c. other please describe: _____
    d. not applicable

12. A "Cancellation" is defined as (select the one answer that best reflects your system):
    a. a trip that is canceled at least _____ HOURS before a scheduled trip
    b. a trip that is canceled at least _____ DAYS before a scheduled trip
    c. other please describe: _____
    d. not applicable

13. A "Late Cancellation" is defined as (select the one answer that best reflects your system):
    a. a trip that is canceled less than _____ HOURS before a scheduled trip
    b. a trip that is canceled less than _____ DAYS before a scheduled trip
    c. other please describe: _____
    d. not applicable

14. A "Same Day Cancellation" is defined as (select the one answer that best reflects your system):
    a. a trip that is canceled _____ HOURS or more before a scheduled trip on the same day
    b. a trip that is canceled _____ MINUTES or more before a scheduled trip on the same day
    c. other please describe: _____
    d. not applicable

15. A "Passenger No-Show" is defined as (select the one answer that best reflects your system):
    ☐ When a passenger cannot be located at the specified pick-up location
    ☐ When a passenger cannot be located at the specified pick-up location OR refuses a trip
    ☐ Other (please describe): _____
    ☐ Not applicable

16. If a passenger is a no-show for the first trip of the day, what happens to any remaining trips booked for that day? (Check the one description that best describes your policy.)
    ☐ Remaining trips are automatically canceled
    ☐ Remaining trips are left on the schedule unless the customer calls to cancel
    ☐ An attempt is made to contact the customer and if she/he is not contacted, the remaining trips are canceled
    ☐ An attempt is made to contact the customer and if she/he is not contacted, the remaining trips are left on the schedule
    ☐ Other (describe): _____

17. What procedures are followed in the event of an apparent passenger no-show? Describe driver procedures, service monitors, dispatchers, and other personnel.
    a. Drivers: _____
    b. Dispatchers: _____
    c. Service monitors: _____
    d. Other personnel: _____

18. In the event of a passenger no-show or late cancel, are you able to make use of the opening in the schedule?
    ☐ Yes ☐ No ☐ Sometimes
    If so, describe process: _____
    _____
    _____

19. Do you have a written passenger no-show/late cancellation policy? ☐ Yes ☐ No
    (If no, skip to Question 25; if yes, please e-mail or mail a copy of the policy to the project manager.)
    a. Does your policy include suspensions or fines for excessive no shows? (Check all that apply.)
    ☐ Fines ☐ Suspensions ☐ No
    If so, describe the length of suspensions or amount of fines applied: _____
    _____
    _____
    b. Describe how "excessive no-shows" are defined (e.g., number/percentage of occurrences, period of time):
    _____
    _____
    c. Does your policy specifically include provisions for no-shows that are "beyond the rider's control"?
    ☐ Yes ☐ No
    If so, how is "beyond the rider's control" defined? _____
    _____
    _____
    d. Does your policy include suspensions or fines for excessive late cancels? (Check all that apply.)
    ☐ Fines ☐ Suspensions ☐ No
    If so, describe the length of suspensions or amount of fines applied: _____
    _____
    _____
    e. Describe how "excessive late cancels" are defined (e.g., number/percentage of occurrences, period of time):
    _____
    _____
    f. Does your policy include advance notification or warnings prior to suspensions or fines being assessed?
    ☐ Yes ☐ No
    If yes, please describe process: _____
    _____
    _____
    g. Does your policy include incentives for passengers who have low rates of no-shows/late cancellations?
    ☐ Yes ☐ No
    If yes, please describe process: _____
    _____
    _____

20. How would you describe the enforcement of your no-show/late cancellation policy during the past year? (Check one.)
    ☐ The policy has been actively enforced
    ☐ The policy has been enforced to some degree
    ☐ The policy has not been enforced
    ☐ Other (describe): _____

21. Who monitors your no-show/late cancellation policy compliance? (Check one.)
    - ☐ Transit agency staff
    - ☐ Broker
    - ☐ Contract operator
    - ☐ Other (describe): _____
    - ☐ Not monitored

22. How was your no-show policy/late cancellation policy developed? (Check all that apply.)
    - ☐ The policy was developed with input from a citizen advisory committee
    - ☐ The policy was developed with public input from other meetings
    - ☐ The policy was developed internally by staff
    - ☐ Other (describe): _____

23. How is information about your no-show and/or late cancellation policy provided to passengers?
    - ☐ The policy is described in the eligibility determination materials
    - ☐ The policy is described in rider brochures
    - ☐ The policy is described in newsletters and/or passenger bulletins
    - ☐ The policy is described in the transit system's Internet website
    - ☐ Other (describe): _____

24. Please describe your appeals process in the event a customer contends his/her suspension or fine.

    _____

    _____

    _____

IV. Software/Technology Information

25. What technologies do you currently use? (Check all that apply.)
    - ☐ Computer scheduling/dispatching software
      Software Name_____ Version No. _____
    - ☐ Automatic vehicle location (AVL)
    - ☐ Mobile Data Computers (MDCs) or Mobile Data Terminals (MDTs)
    - ☐ Other, please describe: _____

      _____
    - ☐ Not applicable (skip to Question 28)

26. How are these technologies used to help reduce the impact of no-shows and late cancellations?
    - ☐ Not applicable

    _____

    _____

    _____

27. Does your software program include a module to track no-shows and/or late cancellations?
    - ☐ Yes ☐ No ☐ Don't know
    - a. If yes, do you use this module? ☐ Yes ☐ No
    - If yes, please describe how you use this module: _____

      _____

V. Service Characteristics

28. Please indicate for each function if it is performed by transit agency employees, contracted broker employees, or contracted operator employees.

	Transit Agency	Contract Broker	Contract Operator
a. Initial trip reservations/advance cancellations/changes	☐	☐	☐
b. Same-day cancellations	☐	☐	☐
c. "Where's my ride?" calls	☐	☐	☐
d. "Will calls" or "call when ready" returns	☐	☐	☐
e. Scheduling	☐	☐	☐
f. Dispatching	☐	☐	☐
g. Vehicle operation	☐	☐	☐
h. Customer comments/complaints	☐	☐	☐

29. If you use a contractor for vehicle operations, are contractors reimbursed for passenger no-shows?
☐ Yes ☐ No ☐ Not applicable
    a. If yes, how are they paid for passenger no-shows?
    ☐ per hour ☐ by mile ☐ per trip
    b. Is the reimbursement amount different from a completed trip rate?
    ☐ Yes ☐ No
    c. If yes, please describe the difference: _____
    _____

30. What level of driver assistance is provided for ADA complementary paratransit service? (Check all that apply.)
☐ Curb-to-curb ☐ Door-through-door
☐ Door-to-door ☐ Other

31. Paratransit trip statistics
Check one: ☐ FY 2003 ☐ FY 2004

		Check if an Estimate
a. Number of ADA certified customers	_____	☐
b. Percentage who are regular riders (i.e., ride at least once a month on average?	_____%	☐
c. Total one-way ADA trip requests scheduled (do not count PCAs or companions)	_____	☐
d. Trips canceled same day of trip	_____	☐
e. Passenger no-shows	_____	☐
f. Carrier no-shows (missed trips)	_____	☐
g. Total annual one-way trips provided (g = c − d − e − f)	_____	☐

VI. Finally

32. Do you think your system has developed a good way of handling ADA complementary paratransit no-shows and/or late cancellations that might be helpful for other systems to learn more about? ☐ Yes ☐ No

33. If so, would you be interested in serving as a "best practices" case study example as part of this project?
☐ Yes ☐ No ☐ Not applicable

Please mail or e-mail copies of your no-show/late cancellation policy and any related information that you distribute to customers (including sample letters) to the project manager listed at the beginning of the survey.

Please submit your survey by November 19, 2004

Thanks very much!

APPENDIX B

Transit Agencies Responding to Survey

- Access Services (Los Angeles, Calif.)
- Ames Transit Agency (Ames, Iowa)
- Ann Arbor Transportation Authority (Ann Arbor, Mich.)
- Anoka County Transit Office (Anoka, Minn.)
- Area Transportation Authority of North Central Pennsylvania (Johnsonburg, Pa.)
- Audubon Area Community Services (GRITS) (Owensboro, Ky.)
- Berks Area Reading Transportation Authority (Reading, Pa.)
- Broward County Transit (Pompano Beach, Fla.)
- Bullhead Area Transit System (BATS) (Bullhead City, Ariz.)
- Butler County Regional Transit Authority (BCRTA) (Hamilton, Ohio)
- C-TRAN (Vancouver, Wash.)
- Capital Area Transportation Authority (Lansing, Mich.)
- Capital Metro (Austin, Tex.)
- Central Contra Costa Transit Authority (Concord, Calif.)
- Central Florida Regional Transportation Authority (Orlando, Fla.)
- Centre Area Transportation Authority (State College, Pa.)
- Champaign–Urbana Mass Transit District (Urbana, Ill.)
- Charlotte Area Transit System, Special Transportation Service (STS) (Charlotte, N.C.)
- Chattanooga Area Regional Transportation Authority (CARTA) (Chattanooga, Tenn.)
- CityLink Transit (Abilene, Tex.)
- City of Modesto Transit (Modesto, Calif.)
- City of Redondo Beach (Redondo Beach, Calif.)
- City of Simi Valley/Simi Valley Transit (Simi Valley, Calif.)
- Clarksville Transit (Clarksville, Tenn.)
- Clemson Area Transit (Clemson, S.C.)
- Central New York Regional Transportation Authority (CNY/RTA) Centro Call-a-Bus Inc. (Syracuse, N.Y.)
- Community Action Regional Transit (Bowling Green, Ky.)
- Community Transit (Everett, Wash.)
- Dallas Area Rapid Transit (DART) (Dallas, Tex.)
- Davis Community Transit (Davis, Calif.)
- Delaware Transit Corporation (Dover, Del.)
- Des Moines Metropolitan Transit Authority (Des Moines, Iowa)
- Duluth Transit Authority (Duluth, Minn.)
- East Bay Paratransit (AC Transit and BART) (Oakland, Calif.)
- East Chicago Transit (East Chicago, Ill.)
- Eastern Contra Costa Transit Authority (Antioch, Calif.)
- Fort Collins Dial-A-Ride (Fort Collins, Colo.)
- Fort Worth Transportation Authority (Fort Worth, Tex.)
- Golden Gate Bridge, Highway and Transportation District (San Francisco, Calif.)
- Greater Cleveland Regional Transit Authority (Cleveland, Ohio)
- Greater Dayton Regional Transit Authority (Dayton, Ohio)
- Greater Hartford Transit District (Hartford, Conn.)
- Greater New Haven Transit District (Hamden, Conn.)
- Greensboro Transit Authority (Greensboro, N.C.)
- Hall Area Transit (Gainesville, Ga.)
- Hampton Roads Transit (HRT) (Hampton, Va.)
- Hazleton Public Transit (Hazleton, Pa.)
- Hillsborough Area Regional Transit (HARTline) (Tampa, Fla.)
- Huron County Transit (Huron, Mich.)
- Intercity Transit (Olympia, Wash.)
- Interurban Transit Partnership (Grand Rapids, Mich.)
- Jacksonville Transportation Authority (JTA Connexion) (Jacksonville, Fla.)
- Kalamazoo Metro Transit (Kalamazoo, Mich.)
- King County Metro (Seattle, Wash.)
- La Crosse Municipal Transit Utility (MTU) (La Crosse, Wis.)
- Laidlaw Transit Services/TARPS (Toledo, Ohio)
- Laketran (Painesville, Ohio)
- Lane Transit District (Eugene, Ore.)
- Lehigh and Northampton Transportation Authority (Allentown, Pa.)
- Link Transit (Wenatchee, Wash.)
- LINK—City of Denton Transit System (Denton, Tex.)
- Lower Rio Grande Development Council (LRGVDC)–Rio Transit Center (Weslaco, Tex.)
- Madison Metro (Madison, Wis.)
- Massachusetts Bay Transportation Authority (MBTA) (Boston, Mass.)
- Mass Transportation Authority (Flint, Mich.)
- Metro (St. Louis, Mo.)
- Metro Mobility (Woodbury, Minn.)
- Metropolitan Atlanta Rapid Transit Authority (MARTA) (Atlanta, Ga.)
- Metropolitan Transit Authority of Harris County (Houston, Tex.)
- Mid-Ohio Valley Transit Authority (Parkersburg, W.Va.)
- Milwaukee County Transit System (Milwaukee, Wis.)
- Montebello Transit (Montebello, Calif.)
- Monterey–Salinas Transit (Monterey, Calif.)
- MTA Long Island Bus (Garden City, N.Y.)
- Nashville MTA (Nashville, Tenn.)
- New York City Transit (New York, N.Y.)
- Niagara Frontier Transportation Authority (Buffalo, N.Y.)

- NJ Transit (Newark, N.J.)
- North County Transit District (Oceanside, Calif.)
- Norwalk Transit District (Norwalk, Conn.)
- Oahu Transit Services, Inc. (The Handi-Van) (Honolulu, Hawaii)
- Omnitrans (San Bernardino, Calif.)
- Orange County Transportation Authority (Orange, Calif.)
- Paducah Area Transit System (Paducah, Ky.)
- Palm Tran CONNECTION (Lake Worth, Fla.)
- Pasco County Public Transportation (PCPT) (Port Richey, Fla.)
- Pensacola Bay Transportation (Pensacola, Fla.)
- Pinellas Suncoast Transit Authority (PSTA) (Clearwater, Fla.)
- Port Authority of Allegheny County/ACCESS (Pittsburgh, Pa.)
- Redding Area Bus Authority (Redding, Calif.)
- Regional Transit Authority/RIDES (Spencer, Iowa)
- Regional Transportation Authority (Corpus Christi, Tex.)
- Regional Transportation Commission (RTC) of Southern Nevada (Las Vegas, Nev.)
- Regional Transportation District (Denver, Colo.)
- Regional Transportation Program, Inc. (Portland, Maine)
- Rhode Island Public Transit Authority (Providence, Rhode Island)
- Riverside Transit Agency (Riverside, Calif.)
- Roaring Fork Transportation Authority (Aspen, Colo.)
- Rock Island County Metropolitan Mass Transit District (MetroLINK) (Rock Island, Ill.)
- RTC (Regional Transportation Commission)/CitiLift (Reno, Nev.)
- Sacramento Regional Transit (Sacramento, Calif.)
- Salem Area Mass Transit District (Salem, Ore.)
- SamTrans (San Carlos, Calif.)
- San Diego Metropolitan Transit System (MTS) (San Diego, Calif.)
- San Joaquin Regional Transit District (RTD) (San Joaquin, Calif.)
- Santa Clara Valley Transportation Authority (San Jose, Calif.)
- Santa Clarita Transit (Santa Clarita, Calif.)
- Sarasota County Area Transit (Sarasota, Fla.)
- Shakopee Transit (Shakopee, Minn.)
- Shuttle—University of Maryland Transit System (College Park, Md.)
- South Bend Public Transportation Corp. (South Bend, Ind.)
- South Coast Area Transit (Oxnard, Calif.)
- South Metro Area Rapid Transit (SMART) (Suburban Detroit, Mich.)
- Space Coast Area Transit (Cocoa, Fla.)
- Spokane Transit Authority (Spokane, Wash.)
- Springfield Mass Transit District (Springfield, Ill.)
- SunLine Transit Agency (Thousand Palms, Calif.)
- Sun Metro/LIFT (El Paso, Tex.)
- Suntran (City of St. George) (St. George, Utah)
- Topeka Metropolitan Transit Authority (Topeka, Kans.)
- Transit Authority of Northern Kentucky (TANK) (Ft. Wright, Ky.)
- Transit Authority of River City (TARC) (Louisville, Ky.)
- TriMet (Portland, Ore.)
- Tyler Transit System (Tyler, Tex.)
- Utah Transit Authority (Salt Lake City, Utah)
- VIA Metropolitan Transit (San Antonio, Tex.)
- Waco Transit System (Waco, Tex.)
- Washington Metropolitan Transportation Authority (Washington, D.C.)
- Waukesha Metro Transit (Waukesha, Wis.)
- Wave (Wilmington, N.C.)
- Western Reserve Transit Authority (Youngstown, Ohio)
- Westmoreland County Transit Authority (Greensburg, Pa.)
- Whatcom Transportation Authority (Bellingham, Wash.)
- York County Transportation Authority (York, Pa.)

Abbreviations used without definitions in TRB publications:

AASHO	American Association of State Highway Officials
AASHTO	American Association of State Highway and Transportation Officials
APTA	American Public Transportation Association
ASCE	American Society of Civil Engineers
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
ATA	American Trucking Associations
CTAA	Community Transportation Association of America
CTBSSP	Commercial Truck and Bus Safety Synthesis Program
DHS	Department of Homeland Security
FAA	Federal Aviation Administration
FHWA	Federal Highway Administration
FMCSA	Federal Motor Carrier Safety Administration
FRA	Federal Railroad Administration
FTA	Federal Transit Administration
IEEE	Institute of Electrical and Electronics Engineers
ITE	Institute of Transportation Engineers
NCHRP	National Cooperative Highway Research Program
NCTRP	National Cooperative Transit Research and Development Program
NHTSA	National Highway Traffic Safety Administration
NTSB	National Transportation Safety Board
SAE	Society of Automotive Engineers
TCRP	Transit Cooperative Research Program
TRB	Transportation Research Board
TSA	Transportation Security Administration
U.S.DOT	United States Department of Transportation