

Attachment T



**Regional
Transportation
District**

1660 Blake Street
Denver, CO
80202

303.299.6000

Regional Transportation District

Americans with Disabilities Act Office

ADA Report as of March 2, 2020

RTD and the ADA

In April of 2015, RTD Civil Rights Division created the ADA Office. The main function of this office is to ensure, monitor, and maintain RTD's commitment to the ADA and DOT requirements for accessibility. In the four plus years the office has been in place, much has been accomplished along with continuing efforts to improve services. This document will highlight a few major accomplishments at RTD, which the ADA Office has either initiated, overseen or been an integral part of.

The ADA Office oversees RTD's compliance with the Americans with Disabilities Act (ADA). The ADA Office ensures and monitors ADA compliance for all services and programs provided by RTD. The purpose of the ADA office is to provide guidance and implementation on policies, procedures and strategies that protect the civil rights of people with disabilities. Internal ADA efforts include, but are not limited to: trainings, organizational awareness, complaint procedures/resolution, effective communication, reasonable accommodations/modifications and ADA compliant design. In addition to these efforts, the ADA Office also assists with proactive endeavors through public information and collaboration to enhance services, and accessibility to vehicles, facilities and programs.

RTD ADA Highlights/Accomplishments

Established the ADA Office as a resource for ADA compliance and guidance district wide: The ADA Office has opened up communication channels and relationships with all major divisions within RTD. The ADA Office has become a vital part of the RTD decision making process when the ADA/DOT requirements are involved. This has created a proactive, cohesive and consistent approach to the ADA/DOT.

Hired ADA Complaints Specialist: The ADA Manager and the Civil Rights Senior Manager recognized that there was a need and an added value to have an ADA Investigator within the ADA Office that would be responsible for investigation, complex alleged ADA discrimination claims, be a resource and support to the other Divisions who are also responsible for investigating, and responding to ADA related complaints. The ADA specialist is also responsible for collecting and analyzing all RTD ADA related complaints, examining and understanding the trends, and producing comprehensive reports that leadership and management can use for corrective action measures, trainings, etc. The position was filled in June of 2017. Since its inception, a robust, comprehensive process for ADA complaints has been established (please see ADA complaints process section below).

- **ADA Complaint Process:** *Once the ADA Complaint Specialist was in place, she evaluated the ADA complaint process and determined that it needed to be upgraded. The ADA Complaint Specialist developed a process that was more consistent, provides documentation, and provides a more cohesive flow of information between operating divisions. The ADA Complaint Process now shows a clear picture of issues with ADA related complaints. The ADA Complaint Specialist tracks and tabulates all ADA related complaints and reports the results to high level managers and the training department. Currently, the ADA complaint process, which is required by the FTA, is working very well for RTD and its passengers.*

- **The current ADA complaint process is as follows:** *Any person wishing to make an ADA related complaint must submit the complaint to RTD Customer Care by completing a web form or calling 303.299.6000. Any other communications that concern an ADA-related incident received through other channels will be routed to Customer Care. Customer Care will forward the ADA related complaint to the appropriate division for investigation, resolution and response. The investigator at each division completes a thorough investigation which includes reviewing any video and audio records, interviewing staff involved and considering all other facts and circumstances to the ADA related complaint. The investigator will decide if the complaint is “at fault” or “not at fault.” If the customer requested a return call, the investigator will call the customer with the resolution of the ADA related complaint. If a customer is not satisfied with the results of the investigation, the ADA office has an appeals process.*

RTD Advisory Committee for People with Disabilities (ACPD): In 2018, RTD was pleased to announce the formation of the RTD Advisory Committee for People with Disabilities (RTD ACPD). The ACPD was formed by the Civil Rights and ADA Offices in collaboration with all departments at RTD. It serves as a channel/conduit between RTD internal operations and the community. The ACPD is advisory in nature, reports to an internal RTD ADA steering committee and meets quarterly (February, May, August, and November). Some of ACPD’s accomplishments are: Implementation of the RTD ADA Hero Awards; Increased the number of automatic doors at the Union Station bus concourse; Provided input and support for the light rail high block procedure; and voiced opinions on the 16th St. Mall renovation project.

Created the Bus Stop Accessibility Form: Initiated by the ADA Office and developed in collaboration with Bus Operations and Capital Programs, this form is used to determine location and feasibility of new and relocated bus stops. It ensures, from our level of control, that stops will be accessible and comply with pertinent standards for accessibility. The form has an extensive check list on compliance. Once completed it is vetted through an approval process involving various departments. The form and process safeguards accessibility to fixed route service.

Implementation of the Bus Stop Identification Program (BSIP): This multi-divisional effort established a request program for people who are Blind and Visually Impaired. BSIP is a plastic medallion mounted on a bus stop pole containing information in Braille and raised letters. By request, medallions are mounted on a bus stop pole at a consistent height allowing passengers to identify proper boarding location instead of just speculating.

FTA Triennial Review: In 2017 RTD completed its ADA triennial review by the Federal Transit Administration (FTA). This review included an “enhanced” review of ADA. RTD completed the triennial review with the need for only a few minor corrections.

2016 National ADA Symposium: RTD was a major sponsor of this coveted event and it coming to Denver. RTD was the first transportation company to sponsor the symposium in its 16 year history. Putting RTD on the national map as a supporter of disability rights, ADA law and educational efforts.

Implemented RTD’s Reasonable Modification Process: This process ensures that RTD will make reasonable modifications to our policies, programs and procedures in order to ensure passengers with disabilities have access to our services. Reasonable modifications are not intended to cause a direct threat to health and safety of others; create undue financial or administrative burdens; constitute a fundamental alteration to a service; not necessary to provide equal access to service.

Implemented RTD's ADA Notice district wide: This notice publicizes RTD's commitment to the ADA and that RTD will not discriminate on the basis of disability. Notice is signed by both the RTD General Manager/CEO and the Civil Rights Senior Manager.

Created/Initiated RTD employee's reasonable accommodation form: Under Title I of the ADA, employers are required to make reasonable accommodations to the work environment based on disability. This form initiates the interactive process to ensure the needs of an employee with a disability are considered/granted.

Modified training procedures to better align with ADA/DOT requirements: ADA Office continues to assist with, improve and edit ADA training materials for bus and light rail operators.

Implementation of numerous trainings to better expose RTD personnel to ADA responsibilities: Some of these trainings are Reasonable Modification, Meet the Challenge managers training, New Employee Orientation, Facts and Snacks lunch sessions, numerous service animal trainings for bus, rail and security departments.

Service Animals: The use of service animals on public transportation nationwide continues to be a serious matter. Regulations on what a service animal is are clear, but public perception is not. The ADA Office has, and will continue to engage on this topic. Providing needed information/clarity to security personnel, bus & rail operators, communications department, training department and the general public.

Created High Block procedures for mobility devices and mobility impairments: To ensure that people with mobility devices and impairments have access to light rail, RTD created a procedure to ensure that people with disabilities have priority on the high block and that passengers with personal items yield to anyone with a disability.

Created and implemented ADA divisional chats/discussions: This effort involved visiting all bus divisions to engage operators on any questions/concerns they may have about the ADA and our services.

Produced ADA scripts for dispatch to assist with ADA matters in the field: The ADA worked closely with the dispatch division to develop consistent responses to common disability related themes that happen in the field. Dispatch is called whenever there is an urgent problem on bus and rail routes.

Established verifiable decrease in ADA related complaints: The ADA Office began tracking and tabulating ADA related complaints in 2018. Since then we have seen a decrease in ADA related complaints. This can be attributed to exposing department heads to this complaint information, and actions taken to remedy.

Assisted and implemented efforts with disabled community for 16th Street Mall design and ADA compliance: RTD has been an important partner to the City of Denver on this project. The ADA Office has initiated numerous meetings with disabled organizations across the City to ensure that all perspectives are heard about accessible design on this important project.

Upgrades to website for accessibility: RTD's website complies with Website Accessibility Guidelines (WCAG 2.0). This ensures information on our website is accessible to people who are blind or visually impaired. In addition RTD has received training from outside sources on website accessibility.

Enhanced Braille Signage at Civic Center Plaza: At the completion of the renovation of Civic Center Station, RTD received comments from the blind community on accessibility to certain areas. RTD engaged with the blind passengers establishing additional Braille signage to better define and identify these areas of concern.

Improved high block ramp design for better accessibility: ADA Office assisted the Capital Programs division to expand the high block ramp for better access and align more closely accessibility standards.

Initiatives from the Access-a-Ride Program

- 1) Completed inventory of SOP's, processes, procedures and development; as well as training curriculum, methodology efforts, and delivery of content.
- 2) Realized productivity gains of +3% over 2018 through process changes which allowed for reduced service costs and helped address manpower shortages among paratransit service providers
- 3) Reduced fleet-size expansion for 2019 by 80% over forecasted projection while continuing to meet demand of paratransit service customers through productivity gains.
- 4) Established a method of reviewing customer and service provider data through dynamic dashboards of key performance indicators (KPIs). Internal development allowed administrative, call center and service provider staff to spot trends and take corrective action to improve overall system performance and service effectiveness through real-time monitoring of KPIs.
- 5) Engaged in QAQC and follow up of Eligibility Assessment provider to assure prompt, FTA compliant, turnaround in requests for qualification by applicants to Access-a-Ride (AaR) service.
- 6) Eliminated Access-a-Ride customer listings for those who are no longer eligible for our services so that we can reflect the actual numbers of riders utilizing our services. Included the first in a two-step process to better identify eligible fare-free AaR customers using the RTD fixed-route system.
- 7) Conducted paratransit customer satisfaction survey to provide updated insights into various aspects of paratransit services; compare progress against previous survey results; and, identify service areas that need improvement.

Additional RTD ADA Accessibility efforts

Re-designed and increased the size of the light rail wheelchair accessible area

Increased size of Access-a-Ride vans (ADA paratransit service)

For new bus acquisitions rearranged wheelchair location/design for better wheelchair maneuverability

Created a new position – ADA Paratransit Sr. Manager (Paul Hamilton)

Restructured the Access-a-Ride Advisory Committee (APAC) including mediator/facilitator for better communication

Extensive RTD ADA information is available on RTD's website

All fixed route buses are accessible

All Access-a-Ride vans are accessible

Contact Information:

Ed Neuberg, ADA Manager

Regional Transportation District

1660 Blake Street, BLK-31 | Denver, CO 80202

o 303.299.2370 | f 303-299-2061

Edward.neuberg@rtd-denver.com

rtd-denver.com