

Jefferson City Transit Development Plan Paratransit Evaluation

Prepared for



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The purpose of this technical memorandum is to summarize the evaluation of JEFFTRAN's paratransit service.

Handi Wheels is the curb-to-curb paratransit service operated by JEFFTRAN that meets the requirements for complementary paratransit service from the Americans with Disabilities Act (ADA) of 1990. Handi Wheels services operate within the boundaries of Jefferson City, and all eligible residents can use the service. Handi Wheels provides service beyond that which is required by ADA because the service area is larger than required. Trips can be scheduled Monday through Friday by contacting the Handi Wheels office. The service operates from 6:45 AM to 5:45 PM weekdays, the same hours as JEFFTRAN fixed route service.

Handi Wheels currently has eight vehicles, six operating vehicles and two spares, and six drivers dedicated to the Handi Wheels service. The service uses modified Ford E-450 chassis mini-buses. All vehicles are equipped with wheelchair lifts and are ADA compliant.

Handi Wheels carries about 200 to 220 passenger trips per day. Passengers rate the service very high in all performance areas.

Handi Wheels is funded by a mix of sources, including passenger fares, City funding and funding from the Missouri Department of Social Services and the Department of Mental Health.

ADA Eligibility

A key part of the paratransit evaluation was to check for compliance with the ADA requirements. Although a complete ADA compliance evaluation is beyond the scope of the project and was not conducted, a cursory review of procedures was conducted. The following summarizes the results of this review.

1. Check service area to make sure it at least includes all areas within $\frac{3}{4}$ of a mile of a "non-commuter" fixed route:
 - Examine and compare the fixed route system map to the paratransit area map (or to the way the paratransit service area is described in public information materials).
 - Ask reservationists about their understanding of what trip origins and destinations can be requested and how they determine if trips are in the ADA paratransit service area.

The JEFFTRAN paratransit service area is coincidental with the City's boundaries. The operating policy goes beyond ADA requirements for service area. Operating personnel appear to understand service requirements.

2. Check "response time:"
 - Examine the public information and what it tells riders about when they can make their trip requests. Make sure it allows people to place trip requests up to the close of the reservation hours on the day before their trip (not 24 hours ahead or 2-3 days in advance). **Complies**
 - Make sure the ride reservation line is open on "normal business hours" (8-4, 9-5) on every day before a day of service (e.g., open Sunday for Monday trip requests, open holidays to take requests for trips the day after a holiday, etc.). If the actual office is not staffed, make sure there is some way for trip requests to be received (e.g., tape

recording). **Complies.** **Passengers can leave trip requests on a telephone answering machine on Sundays.**

- Make sure that as trips are being requested, the reservationists are giving people pickup times that are no more than one hour from their requested times. **Trip times are generally not negotiated.**

3. Check fares:

- Look at the public information for the paratransit and fixed route systems to be sure that paratransit fares are not more than twice the fixed route fares for similar trips. **Handi Wheels fares are \$1.00, twice the base fare.**

4. Compare days and hours (for equality):

Go through all of the fixed route schedules and write down the earliest pick-ups on the schedules and the latest drop-off on the schedules for every route and for weekdays, Saturdays, and Sundays. Compare this to the advertised days and hours for the paratransit service. Make sure the advertised paratransit hours cover all of the times that fixed route buses are on the road. **The service hours are the same.**

5. Check trip purposes:

- Examine the paratransit public information to be sure it tells riders they can ask for trips for any trip purpose and that all trips are treated equally with no priority for certain types of trips. **All trip purposes are served.**
- Interview the reservationists and schedulers to be sure they are not limiting or prioritizing trips by trip purpose. **Complies**
- Talk to riders and local agency staff to see if their experience is that any type of trip is served and served equally. **No complaints were noted; passengers and agency staff rate the service highly.**

6. Check for "capacity constraints:"

- Check to see if the agency has established appropriate service standards for trip denials, waiting lists, trip caps, on-time performance, ride times, and telephone service.

Trip denials.....**None**

Waiting lists..... **None**

Trip caps..... **None**

On-time performance:

- 95% of pick-ups either early or within the on-time performance window.
- 95% of drop-offs no later than stated appointment times and no more than 30 minutes before appt times
- Ride times.....95% of rides with times that are comparable to fixed route times (allowing for walking time to and from stops)
- Phones.....95% of hold times less than three minutes and no hold times more than 10 minutes.

The Handi Wheels operation appears to transport clients to their destination in a timely manner. As a spot check, a total of 15 passenger trips were evaluated on August 11, 2005 for on time performance and passenger pickup/discharge procedure (wheelchair only). Ten trips arrived at their pickup location 3 to 5 minutes before their scheduled arrival time and the remaining five arrived at the scheduled time. All passengers were discharged at their destination on time. Evidence of a problem in this regard was not found.

7. To check eligibility determination:

- Make sure there is a process for applying to be determined “ADA paratransit eligible”
- Look at a sample of recent determinations to make sure decisions are being made within 21 calendar days of the receipt of a completed application form.
- Look at the number of applications received, the determination outcomes, and the total number of certified riders to be sure there are a reasonable number of eligible riders who are ADA (for the size of the area) and that there isn’t an unreasonably high denial rate.
- Make sure applicants are notified in writing of the eligibility determination and if denied (or limited) they are told about the process to appeal.
- Make sure there is an established appeals process with appeals decided by people not involved in the initial determination.

After reviewing the Handi Wheels application and files it was determined that compliance measures are in place that ensures applicants are not being denied appropriate transportation services. In the last 12 months, Handi Wheels accepted 170 applications for service. They currently have 11 inactive clients and denied certification to 2 applicants. Handi Wheels through its application process and procedures appear to be in compliance with ADA guidelines. They are complying with all application notification requirements and provide a process for application appeals; they are tracking applications received and application rejections.

Summary: JEFFTRAN makes every attempt to provide service to every resident and to ensure they are using the appropriate transit service. They could however provide a better information pamphlet that explains all their Paratransit service and travel options.

Review Driver Training and Certifications

All Handi Wheels drivers go through an extensive hiring process that the City of Jefferson uses for all its employees. Because Handi Wheels transports passengers for the Department of Social Services in the Non-Emergency Medical Transportation and the Department of Mental Health the following driver checks are required;

1. Criminal Background Check
2. Child Abuse Check
3. Elder Abuse Check

The Human Resources department keeps account of all employee records and they were not available for review. Additionally, each driver is required to complete additional training courses in:

1. Emergency Accident Procedures
2. First Aid

3. Passenger Assistance
4. Wheel Chair/Lift Training
5. CPR Training
6. Defensive Driver Training

Summary: Verification of these items is available in drivers working files. It was clear that driver training is conducted on a regular basis; however Handi Wheels needs to be more consistent in documenting completion dates for their training modules, and placing verification in the working files of all employees. Although management indicated they talked to all employees about confidentiality of information there was no documentation of employees meeting the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

Vehicle Inventory

The Handi Wheels fleet is in excellent condition. There are a total of eight vehicles in the Handi Wheels fleet. Vehicles are not older than seven years of age and have less than 160,000 miles. All vehicles are Ford model mini-buses with a modified chassis and wheelchair lift equipped with a standard seating capacity of 20 passengers. Table 1 is the Handi Wheels vehicle roster. JEFFTRAN conducts all maintenance services and has a preventative maintenance schedule for all vehicles.

Table 1: Handi Wheels Vehicle Roster

Manufacture	Model	Year
Ford-Eldorado	Aerotech - E Series	1998
Ford-Diamond	E-450	1999
Ford-Goshen	E-450	2005
Ford-Goshen	E-450	2004
Ford-Diamond	E-450	2001
Ford-Glaval	E-450	2002
Ford-Diamond	E-406	1999
Ford-Goshen	E-450	2005

A cursory safety check of each Handi Wheels vehicle was conducted. Attachment 1 shows the conclusions from that review. All vehicles were found to meet the safety guidelines.

Summary: Although the modified mini-buses allow grouping of clients and are well maintained it may be prudent to investigate the addition of sedans to the vehicle fleet for Handi Wheels. Sedans are more energy efficient, more personal and more maneuverable in some residential areas. At times when single trips are the norm, sedans may be less expensive.

Handi Wheels User Information

Information on Handi Wheels services is very limited. There are two small paragraphs in the JEFFTRAN schedule book along with the following items supplied by JEFFTRAN:

1. A Handi Wheels application
2. Request for Verification of Disability
3. An ADA determination form
4. An Eligibility Rejection letter

Summary: Although these items meet the existing need they are short of providing a clear picture of the services available. The Handi Wheels information in the schedule book should be

revised, given greater emphasis and separated from the fixed route service data. There is no mention of Non-Emergency Medical Transportation service or Mental Health Services or the difference between them.

Trip Scheduling

A review of passenger pickup assignments was conducted to seek possible service efficiencies. Trip reservation hours are from 6:45 a.m. to 5:45 p.m., Monday through Friday. There is a telephone recording for trip requests to be made over the weekend. It can also be used to cancel trips. Handi Wheels is currently using a Data Base program that was designed by Richard Turner (Transit Division Director) in 1996 and has been adjusted periodically to serve the changing requirements in various paratransit programs and contracts. The program allows for relatively easy trip matching and verification.

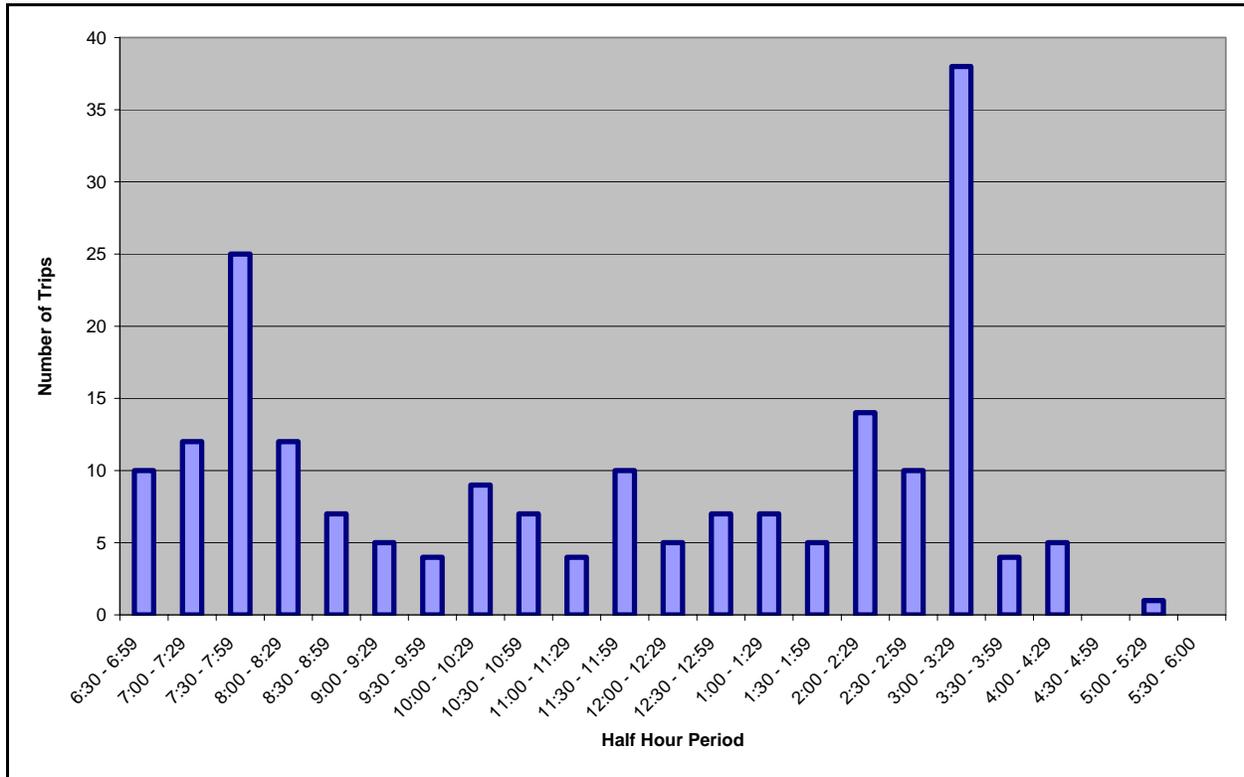
Summary: While monitoring the trip matching process it was quite evident that Handi Wheels dispatchers need to be using a hands free phone system. Dispatcher's productivity was slowed because they could not utilize the entire keyboard with both hands, because they were holding the phone with their off hand. Most difficulties occur when clients are making will call returns, because they stretch the system at inopportune times. At busy times several calls had to be put on hold longer than necessary. Additionally the dispatch office appears under staffed at times. During peak times the task of inputting reservations, taking calls, radio dispatching and handling other office needs can be overwhelming.

Demand Analysis

Handi Wheels currently carries about 200 to 220 passenger trips per day. Ridership has been increasing at about four percent annually, a rate greater than the overall rate for the JEFFTRAN system. If this trend continues Handi Wheels ridership will reach 270 daily trips within five years. It is likely to assume that the need for more service will increase as the population in the city continues to age and more seniors give up driving because of medical and economic reasons. The cost of operating a car can compete with the need of prescription drugs, lodging and food. Increasing paratransit ridership will result in challenges for JEFFTRAN.

As with other forms of transportation, the demand for paratransit services among persons with disabilities varies during the course of the day. Many of the passenger trips made on Handi Wheels are work-related; therefore demand demonstrates the traditional peaking during the morning and afternoon. Figure 1 is a graph of Handi Wheels passenger pickups by 30-minute periods taken from a trip manifest for one day. Because Handi Wheels ridership patterns are repetitive, a summary for this one day is presumed to be reflective of the overall demand for Handi Wheels.

Figure 1: Daily Demand for Handi Wheels Trips



Handi Wheels operates six vehicles each day, with about 45.5 daily service hours. Thus, the paratransit system’s productivity is between 4.4 and 4.8 trips per hour. At times JEFFTRAN must deploy more than the scheduled service to meet the demand. Handi Wheels has a very high productivity rate compared with other similar paratransit services. The relatively compact service area, and the resultant short trips, are undoubtedly factors in this high productivity rate. However, it is also the case that Handi Wheels is operated in an efficient manner.

Table 1 shows how Handi Wheels drivers are deployed.

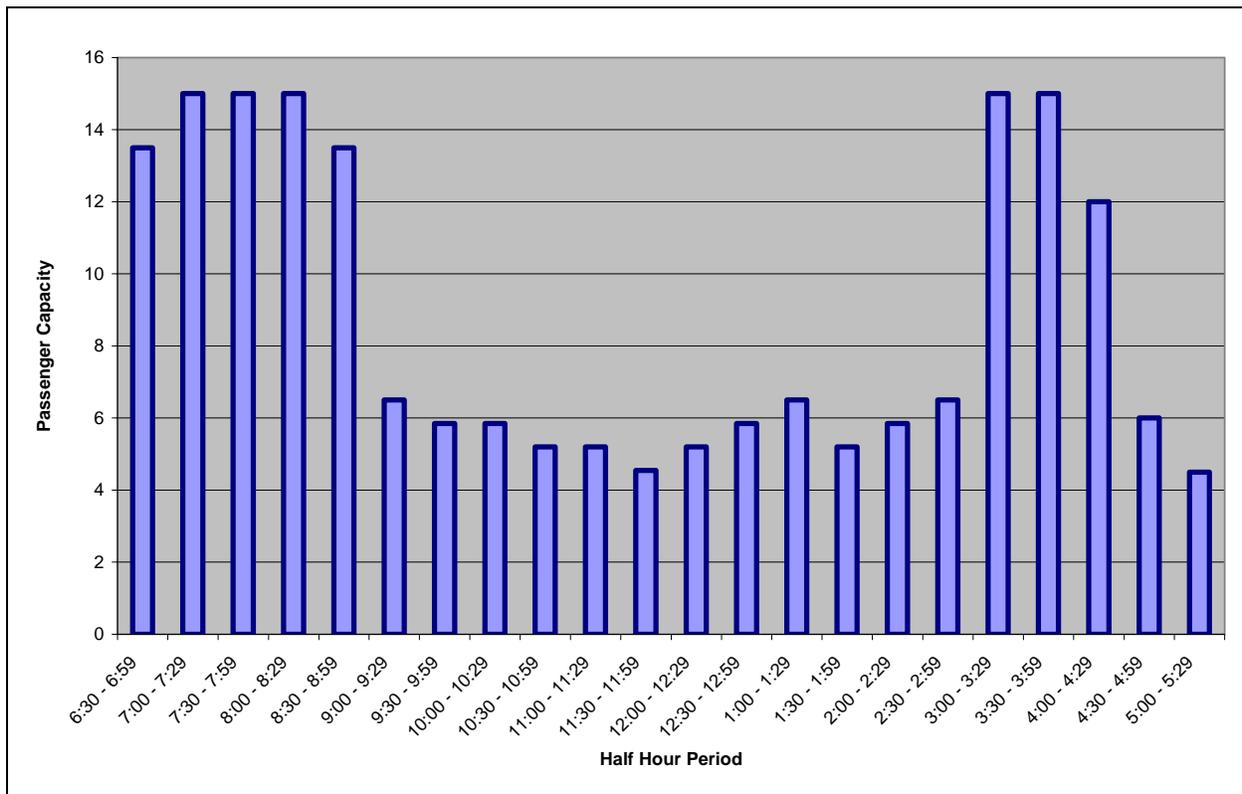
Table 2: Handi Wheels Driver Shifts

Driver	First Shift	Subtotal	Second Shift	Subtotal	Total
1	6:30 - 11:45	5.3	2:15 - 5:30	3.3	8.5
2	9:00 - 4:00	7.0			7.0
3	6:45 - 9:45	3.0	12:00 - 4:30	4.5	7.5
4	6:30 - 1:30	7.0			7.0
5	6:30 - 8:45	2.3	10:15 - 4:30	6.3	8.5
6	6:30 - 10:30	4.0	12:45 - 5:15	4.5	8.5
Total Pay Hours					47.0
Prep & Allowances Time					1.5
Total Service Hours					45.5

A challenge in providing efficient paratransit service is to match the supply of service to the demand for the service. The capacity of a paratransit system is difficult to measure because it is a function of so many variables, such as the length of the trips, the dispersal of origins and destinations and the ability to group trips, and passenger boarding and alighting times.

Figure 2 shows the approximate paratransit capacity available during the day, estimated based on scheduled vehicles in operation and assumed trip lengths and origin/destination dispersal. The estimated capacity during the peak periods assumes that the demand is such that multiple trips can be scheduled on each vehicle and that origins and/or destinations are clustered, as in the case of a workshop or high density residential area.

Figure 2: Handi Wheels Estimated Capacity



Comparing actual demand from Figure 1 and estimated capacity in Figure 2 it can be seen that demand exceeds capacity during certain periods. The result is longer waits for service, especially for “will call” trips that are not scheduled a day in advance. Another result is that JEFFTRAN must deploy additional vehicles at times, using supervisory personnel or other available personnel, to meet the demand.

An opportunity may exist to reduce peak demand and make other adjustments to avoid having to increase service and costs.

It is difficult to determine how to best address this situation at this time. Decisions regarding the fixed route service hours need to be made, and the demand for paratransit service needs to be evaluated in greater detail.

Other Paratransit Providers

Other paratransit providers operate in the Jefferson City area. Most are funded under the Non-Emergency Medical Transportation (NEMT) program contract with the Department of Social Services (Medicaid). These providers bring users from outside the city limits to medical facilities in the city. Very few pickup and drop offs occur within the city unless it is a three way trip with the final destination outside the city limits. Those trips inside the city limits are usually stops to the pharmacy or the grocer before returning home outside the city. Several of the above mentioned providers transport special clients in alternative facilities or group homes.

Below is a list of those providers, the surrounding counties they serve and their company status.

Company	County	Status
Advantage Medical Transportation	Boone & Cole	Private for Profit
Capital City ACSS	Cole	Private Not for Profit
Care Tran	Boone	Private for Profit
Checker Livery	Boone/Cole/Mont	Private for Profit
Cole County Residential	Cole	Private Not for Profit
Huck's Taxi & Shuttle	Boone & Calloway	Private for Profit
Independent Living Resource Center	Cole	Private Not for Profit
John Luter Transportation,	B/Ca/Co/Mon	Private for Profit
Medical Transit Co.	B/Ca/Co/Mon	Private for Profit
Missouri River Taxi	Boone & Moniteau	Private for Profit
New Horizons	Cole	Private Not for Profit
OATS, Inc.	B/Ca/Co/Mon	Private Not for Profit
Serve, Inc.	Calloway	Private Not for Profit
SKT Medical Transportation	Calloway & Cole	Private for Profit
Smith Medical Transportation	B/Ca/Co/Mon	Private for Profit

One of the provisions of the New Freedom program from the recently passed SAFETEA LU transportation bill is a requirement for a coordinated public transit – human services transportation plan. JEFFTRAN will be expected to work with these other paratransit providers in developing this coordinated transportation plan, probably through the aegis of the MPO. Guidance for this activity is not available as yet. Attachment 2 shows program information available at this time.

Conclusions

The following are conclusions and recommendations based on the evaluation of JEFFTRAN Handi Wheels paratransit service.

- Overall Handi Wheels is a well run operation that provides good service to the mobility limited residents of Jefferson City. Based on a cursory review, Handi Wheels is compliant with the pertinent provisions of the ADA complementary paratransit service requirements. JEFFTRAN should continue to monitor compliance matters, and be alert to comments and inquiries from the public and passengers that may indicate a developing problem in this regard.
- In recent years Handi Wheels has benefited from a significant increase in funding from the NEMT and Medicaid Waiver programs. This has reduced the need for City funding and has helped fund an increase in paratransit ridership. With the possibility of funding

reductions in these programs, Handi Wheels is vulnerable to reduced funding which would trigger a need for service reductions or increased City funding. The City Council and JEFFTRAN should be aware of this situation and be prepared to respond in an appropriate manner, if necessary.

- Proposed service expansion in the fixed route service will require parallel increases in Handi Wheels service, particularly regarding the length of the service day. JEFFTRAN needs to be able to respond to these changes, particularly as the changes affect the scheduling of drivers and dispatch personnel. JEFFTRAN will change from a one shift weekday operation to a two shift operation, potentially with weekend service. This will require JEFFTRAN to modify work practices related to driver assignments as necessary to cover the longer service day. JEFFTRAN should consider integrating paratransit and fixed route shifts, not to reduce Handi Wheels service, rather to achieve more flexibility and greater efficiency in driver assignments.
- As demand for Handi Wheels service continues to grow there will be increased pressure on JEFFTRAN to deliver timely service. Handi Wheels' passenger per hour statistic is already high and scheduling is difficult during the peak times. Currently Handi Wheels is operating at nearly five passengers per hour with an increase to nearly six passengers per hour by 2011. Several changes in practice are suggested:
 - JEFFTRAN should institute a practice to negotiate trip times to move trips away from the peak time. This is allowable under ADA regulations and can be used as a tool to better balance supply and demand in transit operations.
 - JEFFTRAN should work with agencies and organizations that serve mobility limited individuals to schedule services in a manner that reduces the peaking that is currently present.
 - JEFFTRAN should begin a program to encourage individuals to use the fixed route service instead of Handi Wheels. The new Gillig low floor buses are much easier for persons in wheelchairs to use. Improved fixed route schedule information, travel training and fare incentives are among the methods that can be used to move some trips to fixed route.
 - JEFFTRAN must consider additional service if demand for Handi Wheels continues to grow. Additional service will add to both capital and operating expenses.
- JEFFTRAN should take the lead and begin to prepare for work on the Coordinated Human Services – Public Transit Transportation Plan. This will be required in 2007 to access the New Freedom funding program. In addition, this work will give the City an opportunity to assess the need for paratransit services in other parts of the metropolitan area.
- JEFFTRAN should update and improve Handi Wheels user information as recommended in the Marketing Plan.

ATTACHMENT 1

Handi Wheels Vehicle Safety Checklist								
Vehicle Number:	620	621	622	623	624	625	626	627
Vehicle Identification Number:	1FDXE40F2WBH64058	1FDXE40S4XHC04252	1FDXE45S35HB44339	1FDXE45P44HA91628	1FDXE45S41HB3692	1FDXE45562HA94421	1FDXE40F9XHC30414	1FDXE45S15HB44338
Vehicle Make:	Ford-Eldoroda	Ford	Ford-Goshen	Ford - Goshen	Ford-Diamond	Ford-Glaval	Ford-Diamond	Ford-Goshen
Vehicle Model:	Aerotech - E Series	E-450	E-450	E-450	E-450	E-450	E-406	E-450
Manufacturers Model Year:	1998	1999	2005	2004	2001	2002	1999	2005
Mileage:	156044	107224	6802	13848	102018	91895	156639	7597
Date of last brake Repair/Replacement	5/17/2005	7/20/2005			6/12/2005	1/21/2005	3/25/2005	
1. Are individual maintenance records available for each vehicle?	Yes	X	X	X	X	X	X	X
	No							
2. Are seatbelts in working order?	Yes	X	X	X	X	X	X	X
	No							
3. Is the Wheelchair Lift in working order?	Yes	X	X	X	X	X	X	X
	No							
4. Are Heating and Air Conditioning operational?	Yes	X	X	X	X	X	X	X
	No							
5. Are Windshield Wipers in working order?	Yes	X	X	X	X	X	X	X
	No							
6. Does the vehicle have right and left rearview mirrors?	Yes	X	X	X	X	X	X	X
	No							
7. Are No Smoking signs posted in the vehicle?	Yes	X	X	X	X	X	X	X
	No							
8. Are the interior and exterior in an acceptable condition?	Yes	X	X	X	X	X	X	X
	No							
9. Date of last brake repair/replacement?	Yes	X	X	X	X	X	X	X
	No							
10. Is the vehicle equipped with the following safety equipment?	Yes	X	X	X	X	X	X	X
	No							
11. First-Aid Kit	Yes	X	X	X	X	X	X	X
	No							
12. Fire Extinguisher (ABC Type)	Yes	X	X	X	X	X	X	X
	No							
13. Triangle/Flare kits or Glowsticks	Yes	X	X	X	X	X	X	X
	No							
14. Blood Borne Pathogen spill kits	Yes	X	X	X	X	X	X	X
	No							

ATTACHMENT 2

SAFETEA-LU AND TRANSIT OPTIONS FOR PERSONS WITH DISABILITIES

The recently enacted highway and transit bill, known as SAFETEA-LU, continues all the transit programs and aspects that have helped address the mobility needs of persons with disabilities. It also adds a new program and several new aspects that further enhance the national commitment to access and mobility.

THE NEW FREEDOM TRANSIT PROGRAM

SAFETEA-LU establishes a new program of formula-based transit grants, the Sec. 5317 New Freedom Program. This is part of a larger, government-wide "New Freedom Initiative" that President Bush has been promoting since his first presidential campaign. Formally established in 2001 through Presidential Executive Order, the New Freedom Initiative is a means to integrate persons with disabilities into the workforce, and into daily community life, through a variety of strategies carried out by the federal departments of Labor, Health and Human Services, Housing and Urban Development, Education, Justice, Veterans Affairs, and - now - Transportation. For more information on the government-wide initiative and its related resources, go on-line to www.disabilityinfo.gov.

The Sec. 5317 transit program allocates money based on states' and urbanized areas' populations of persons with disabilities. Sixty percent of each year's Sec. 5317 appropriation is distributed to the urban transit systems in areas with populations greater than 200,000. Twenty percent is distributed to the states for use in their urban areas with populations between 50,000 and 200,000, and the remaining twenty percent is distributed to the states for use in their rural areas.

SAFETEA-LU guarantees the following levels of Sec. 5317 New Freedom Transit funding:

FY 2006, \$78.0 million
FY 2007, \$81.0 million
FY 2008, \$87.5 million
FY 2009, \$92.5 million

States and large-urban transit systems receiving these Sec. 5317 allocations are not to engage in New Freedom transit activities themselves. Instead, they are to carry out areawide competitive solicitations for local New Freedom projects. The eligible subrecipients are units of state or local government, nonprofit organizations, and other operators of public transportation services.

Starting in FY 2007, these projects, if they are to receive Sec. 5317 funds, are to be selected through locally developed, coordinated public transit-human services transportation plans. This is the same type of process that SAFETEA-LU now requires of states and urbanized areas with regard to Sec. 5316 Job Access and Reverse Commute grants, and for states' Sec. 5310 elderly and disabilities transit grants.

Sec. 5317 funds are to be used to provide public transportation services and alternatives above and beyond the baseline requirements of the Americans with Disabilities Act (ADA), especially to help persons with disabilities access jobs and employment-related services. These funds may be used for capital expenses (at an 80 percent federal share) or operating expenses (at a 50 percent federal share); the "non-federal" share may be derived from cash, service agreements with state, local or private social services organizations, or from other federal funding sources, including Temporary Assistance for Needy Families (TANF), that allow their funds to be expended on transportation activities.

Thus far, there are no further pieces of guidance from the Federal Transit Administration (FTA) on the details of the New Freedom transit program. Some information is likely to be issued in conjunction with the FY 2006 annual apportionment of FTA formula grants, whenever that occurs, but most of the FTA guidance on this program is likely to be timed to help states and urban areas prepare for the FY 2007 program year.

OTHER SAFETEA-LU PROVISIONS FOR THE DISABILITY COMMUNITY

Easily overlooked, but perhaps most significant in the long run, SAFETEA-LU now requires that representatives of the disability community have a meaningful voice in statewide and metropolitan transportation planning processes.

In the realm of FTA grant programs, SAFETEA-LU continues all the programs that have been of greatest value to the disability community, including the Sec. 5307 and 5311 formula grants for public transit in urban and rural areas, and the Sec. 5310 program of capital assistance for elderly and disabled persons' transit. Other "Capitol Clips" discuss these programs in greater detail, but it should be noted that SAFETEA-LU calls for a seven-state demonstration of Sec. 5310 operating assistance eligibility, with the details yet to be determined by FTA. SAFETEA-LU continues to allow all transit systems in areas with populations of more than 200,000 to spend up to 10 percent of their Sec. 5307 allocations on ADA-mandated complementary paratransit services, and the law also calls for special paratransit pilot projects in Oklahoma City and Tulsa, Okla.

For official information on New Freedom and other federal transit programs, visit the FTA "SAFETEA-LU" web page, at http://www.fta.dot.gov/17003_ENG_HTML.htm.

Questions & Comments

From a variety of questions FTA listeners recognized the following concerns:

- **Desire to keep coordinated plans (all planning document) consolidated as well as an overall concern that additional planning requirements fit efficiently within planning requirements. Concern as to whether or not the 5317 program details will be in the goals and policies with projects in the TIPs or in the UPWP (UPWP: MPO Unified Planning Work Plan).**
- **Desire for human service organizations to be eligible to compete for New Freedoms program funds in areas, such as some rural areas, where community transportation services/organizations do not exist.**
- **Query over whether or not program funding recipients will be restricted to serving only people with disabilities, or on the other hand if recipients will be required to serve dual users, i.e. youth, non-disability employment, etc.**
- **Will all persons with a disability automatically qualify for service eligibility?**
- **Clarification from FTA as to whether or not the 5317 funding is new or if it is coming from other plans.**

Q: When do coordinated planning guidelines kick in?

A: 5317 Planning: Fiscal Year 2007

5310 Planning: Fiscal Year 2007

JARC Planning: Fiscal Year 2006