TO: Chair and Members  
Public Works Committee  
WARD(S) AFFECTED: CITY WIDE  
COMMITTEE DATE: April 19, 2010  
SUBJECT/REPORT NO:  
ATS Master Plan - Eligibility and Registration Policy Revision for Accessible Transportation Services (PW03128c) - (City Wide)  
SUBMITTED BY:  
Beth Goodger  
Acting General Manager  
Public Works Department  
PREPARED BY:  
Don Hull  
Director of Transit  
(905) 546-2424, Extension 1860  
Paul Thompson  
Manager of ATS  
(905) 546-2424, Extension 1862  
SIGNATURE:  
RECOMMENDATION  
(a) That the General Manager of Public Works be authorized and directed to:  
   (i) expend $500,000, on an ongoing basis, in previously approved Provincial Gas Tax funds from Account 53330, to increase the 2010 budgeted DARTS trips by 17,000 trips, annualized, from 426,000 to 443,000 trips, in response to growth in demand driving a sustained unacceptable number of unaccommodated trip requests;  
   (ii) expand the previously approved 2010 ATS fleet capital replacement by four (4) vehicles, increasing overall fleet from 66 to 70, at a cost of $749,700 inclusive of vehicle make-ready contingency, funded from Provincial Gas Tax Reserve 112204, to provide sufficient fleet to implement accommodation measures under Recommendation (a) to Report PW03128c;  
(b) That the General Manager of Public Works be authorized and directed to bring forward a multi-year Accessible Transportation Services (ATS) service enhancement and budget plan for implementation of the revised Eligibility and Registration Policy, as identified within Report PW03128c, over and above annual maintenance budget increase requirements, for the consideration of Council as part of the 2011 budget process;
(c) That the General Manager of Public Works be authorized and directed to carry out consultation with community stakeholders to examine and develop cost mitigation opportunities, through community partnerships, of alternative design and delivery of specialized transit service strategies;

(d) That the General Manager of Public Works be authorized and directed to hire a contract Project Manager for a 24 month period to lead the recommended community consultation and strategic implementation, to be funded from Capital Account 5300483400;

(e) That the Executive Summary of the final report of the study “Implementation of New Eligibility Policy at Accessible Transportation Services” carried out by Nelson\Nygaard Consulting Associates, attached as Appendix A to Report PW03128c, be received.

**EXECUTIVE SUMMARY**

This report presents two separate, but related recommendations regarding implementation of the City’s new eligibility policy for Council’s consideration.

Recommendation (a) (i) seeks Council’s approval and direction for the reallocation of previously reserved funds for implementation of Council’s new Specialized Transit Eligibility policy, (Report PW03128), to fund an immediate increase in the Specialized Transit program of 17,000 trips annually on a permanent basis in response to an unacceptable level of trip request denials. The annualized 2010 costs of $500,000 can be accommodated within available operating funding approved for the implementation of the new eligibility policy, and there is no requirement in 2010 for additional staffing within the ATS program, as the trips result from existing levels of requests.

Given the current operating configuration with DARTS as the primary service provider, additional fleet will be required in 2010 and beyond to provide the expanded number of trips expected. Recommendation (a) (ii) to this report provides authority to purchase additional vehicles in 2010 in conjunction with the planned fleet purchase. Future fleet expansion necessary to accommodate the annual increase in trips will be brought forward for consideration as a capital program request in each year of the multi-year budget implementation plan, and will be dependent on the nature of the trips to be served.

Recommendation (b) responds to Council’s directions arising from the predecessor to this Report, that being PW03128(b). At that time, Staff recommended adoption of a new Eligibility Policy for the Specialized Transit program as well as a “phased-in” approach to implementation. The proposed policy was approved in its entirety, with one notable exception, reassessment of the existing clients under the new policy. While the reassessment would ultimately result in substantial future budget pressure mitigation, it would also have displaced a number of clients that had come to rely on the service over a period of years. Notwithstanding, the Project Steering Committee, composed of members of the Advisory Committee for Persons with Disabilities, Seniors Advisory
Committee, and the community, recommends the reassessment based on equity and the opportunity to create new capacity from the existing budget for the newly eligible clients with no other affordable means of transportation.

As directed, and as described as Phase 2 in Report PW03128(b), a study was carried out on behalf of the City by Nelson/Nygaard Consulting Associates, given a number of cost and operational uncertainties that required further study before full implementation implications could be determined. The study reached a number of significant conclusions, which are detailed in the Appendix A to this Report.

The third and final phase of the new policy implementation gave staff direction to report back to Council with an implementation plan based on the Consultant’s findings. This Report provides the analysis and recommendations for implementing necessary service changes over a four (4) year period starting in 2011, subject to Council approval of a multi-year service enhancement and budget implementation plan as detailed in Recommendation (b) to this Report.

There is an unprecedented anticipated influx in demand that will result from the changes in the policy, as well as concurrent increases due to general growth in senior and disabled demographic groups, and those increases anticipated from enactment of further Accessibility for Ontarians with Disabilities Act, 2005 (AODA) legislated standards. As well, there has been a growth in the number of trip request denials on the DARTS service within the latter half of 2009, which was not identified at the time of the Study but will require address with the other identified new demand.

The increase in demand due to eligibility changes alone is projected at 34%, to be met over a two year phase-in period, beginning in 2011. There is a further projected impact of 22% resulting from accommodation of current latent demand for trips, expected population growth in the senior cohort, and anticipated service requirements under AODA. In all, accommodation of up to 250,000 new trips annually should be expected by 2014. Recommendation (b) to this Report sets the target for taking new registrants into the program beginning in 2011, subject to further Council approval during 2011 budget discussions which allows for sufficient lead time to put required services into place, and to ensure that there is no impact on the City tax supported budget in 2010.

### TABLE 1  5 Year Demand Forecast

<table>
<thead>
<tr>
<th>Unconstrained Demand Forecast - Without Reassessment</th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>Base</td>
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<td>426,585</td>
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<td>426,585</td>
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</tr>
<tr>
<td>Unaccommodated Current Demand</td>
<td></td>
<td>17,063</td>
<td>17,063</td>
<td>17,063</td>
<td>17,063</td>
<td>17,063</td>
</tr>
<tr>
<td>Demand due to Eligibility Changes</td>
<td></td>
<td>-</td>
<td>47,865</td>
<td>95,731</td>
<td>143,596</td>
<td>143,596</td>
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<tr>
<td>Increase due to Population Growth</td>
<td></td>
<td>-</td>
<td>6,583</td>
<td>13,988</td>
<td>23,203</td>
<td>31,693</td>
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<tr>
<td>Increase due to Service Changes</td>
<td></td>
<td>-</td>
<td>-</td>
<td>15,309</td>
<td>31,463</td>
<td>48,444</td>
</tr>
<tr>
<td>Total demand</td>
<td>426,585</td>
<td>443,648</td>
<td>498,096</td>
<td>568,676</td>
<td>641,910</td>
<td>667,381</td>
</tr>
<tr>
<td>Cumulative Change to 2009</td>
<td>4%</td>
<td>17%</td>
<td>33%</td>
<td>50%</td>
<td>56%</td>
<td>66%</td>
</tr>
</tbody>
</table>

Based on 2010 program budget and projected annual general cost increases of 3%, the 5 year impact of demand growth results in a requirement for $5.7M in new annual operating requirements by 2014, as noted below.
TABLE 2  5 Year Projected Cost Impacts

<table>
<thead>
<tr>
<th>Year</th>
<th>Cumulative New Trips</th>
<th>City Customer Service FTE</th>
<th>Cumulative New Costs</th>
<th>Increase over Previous Year</th>
<th>Avg Cost Per New Trip</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>17,063</td>
<td>-</td>
<td>$431,000</td>
<td>$431,000</td>
<td>$25.26</td>
</tr>
<tr>
<td>2011</td>
<td>71,511</td>
<td>1.9</td>
<td>$1,456,000</td>
<td>$1,025,000</td>
<td>$20.36</td>
</tr>
<tr>
<td>2012</td>
<td>142,091</td>
<td>4.5</td>
<td>$3,017,000</td>
<td>$1,561,000</td>
<td>$21.23</td>
</tr>
<tr>
<td>2013</td>
<td>215,325</td>
<td>7.1</td>
<td>$4,754,000</td>
<td>$1,737,000</td>
<td>$22.08</td>
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<tr>
<td>2014</td>
<td>240,796</td>
<td>8.0</td>
<td>$5,689,000</td>
<td>$935,000</td>
<td>$23.63</td>
</tr>
</tbody>
</table>

Approval of a service enhancement and budget implementation plan will be sought as part of the 2011 budget process, in order to confirm Council's direction for the multi-year implementation. Staff will then establish the support systems required for administration of the new eligibility policy including issuing an RFP and contracting with the professional third party resources required to administer the functional mobility assessments necessary to determine eligibility.

The projected funding for the program change is approximately $5.7M by 2014 for which there is $500K in approved operating funds, but no current identified funding source for the remaining $5.2M. Recommendation (b) to this Report directs staff to bring forward a plan for Council endorsement of the approach to increases in the program requirement of the City tax supported budget in each of the years between 2011 and 2014, in predetermined amounts subject to annual verification of actual requirements. This approach is necessary as once initiated, there is little if any opportunity for withdrawal or modification of the program changes based on cost and/or funding availability, the reason being that the predominance of newly eligible registrants, while large in anticipated numbers, is expected to be narrow in scope of disabilities, essentially comprised of persons with developmental and visual disabilities. As such, it will be impossible to constrain client registration growth once the eligibility policy is expanded to include these further classifications of disability.

Hamilton’s existing eligibility policy specifically includes both those with Alzheimer’s and those requiring dialysis as automatically eligible with no further screening for determination of functional capability to use conventional transit. Additionally, Hamilton’s Taxi Scrip program, accounting for some 25-30% of all trips is an exceptional offering that exists in a limited number of municipalities across Canada. As identified in the 2010 Transit budget presentation, these are the major contributing factors to Hamilton having an extraordinarily high number of registrants and trips per capita.

The Nelson\Nygaard study strongly recommends recertification of existing registrants, within a time frame of 18-24 months from implementation of the program, using a “screen in” process to determine those who would clearly meet the criteria for unconditional eligibility. Recertification of existing ATS registrants would achieve goals of equity and consistency, and the realization of cost mitigation of some $1.2M in annual operating cost by 2014, which might be deployed in meeting the service expansion required to meet the needs of new registrants resulting from the change in policy. The
The cost differential of the decision to not reassess existing registrants is set out in Table 3 below.

### TABLE 3  Cost Impact of **NOT** Reassessing Existing Registrants

<table>
<thead>
<tr>
<th>Year</th>
<th>Cumulative New Trips</th>
<th>City Customer Service FTE</th>
<th>Cumulative New Costs</th>
<th>Increase over Previous Year</th>
<th>Avg Cost Per New Trip</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>17,063</td>
<td>-</td>
<td>$431,000</td>
<td>$431,000</td>
<td>$25.26</td>
</tr>
<tr>
<td>2011</td>
<td>54,381</td>
<td>1.3</td>
<td>$1,157,000</td>
<td>$726,000</td>
<td>$21.28</td>
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<tr>
<td>2012</td>
<td>106,020</td>
<td>3.2</td>
<td>$2,349,000</td>
<td>$1,192,000</td>
<td>$22.16</td>
</tr>
<tr>
<td>2013</td>
<td>159,749</td>
<td>5.1</td>
<td>$3,674,000</td>
<td>$1,325,000</td>
<td>$23.00</td>
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<tr>
<td>2014</td>
<td>182,938</td>
<td>5.9</td>
<td>$4,505,000</td>
<td>$831,000</td>
<td>$24.63</td>
</tr>
</tbody>
</table>

**IMPACT OF NO REASSESSMENT**  

$1,184,000

The issue of inequity introduced by not reassessing existing passengers has been identified by the Project Steering Committee, which includes representation from the community, as a major inconsistency in the approved program. The Steering Committee anticipates that the inequity between persons with disabilities within the community will be a significant issue, and supports the consultant recommendation in this regard, strongly recommending Council reconsideration of the approved direction.

Given the current operating configuration with DARTS as the primary service provider, additional fleet will be required in 2010 and beyond to provide the expanded number of trips expected. Recommendation (a) (ii) to this report provides authority to purchase additional vehicles in 2010 in conjunction with the planned fleet purchase. Future fleet expansion necessary to accommodate the annual increase in trips will be brought forward for consideration as a capital program request in each year, and will be dependent on the nature of the trips to be served.

Recommendation (d) seeks authority for retention of a Project Manager for a 24 month fixed term to carry out Recommendation (c) to this Report, as well as to initiate implementation activities. The program changes being contemplated require extensive work with community stakeholders, multiple service providers, and several thousand registrants and/or their family and caregivers. Stakeholders within the services sector dealing with persons with developmental and cognitive disabilities have offered to work closely with the City to find new and creative ways of providing service and to ensure...
that cost impacts are minimized. The work cannot be undertaken with existing staffing levels in the ATS section of Transit.

Implementation of the revised eligibility policy for the specialized transit program, the basis for this report, will represent the most significant and complex change in this program in some 15 years, and will establish the program vision for at least the next 5 years.

Alternatives for Consideration - See Page 10

### FINANCIAL / STAFFING / LEGAL IMPLICATIONS

**Financial:** Financial implications are outlined in the executive Summary and Analysis/Rationale sections to this Report, and total $5.2M in unfunded service cost annually by 2014.

Initial project operating funds in the amount of $850,000, and associated capital funds of $900,000, had been allocated from Provincial Gas Tax reserves, but, as had previously been reported to Council, there were additional cost pressures of $1,750,000 anticipated if no reassessment of existing registrants was undertaken, and if the levels of uptake from the community had grown since the conception of the program change.

**Staffing:** A Project Manager will be hired for a 24 month period, funded from existing capital. There are no immediate staffing implications in 2010 that will affect operating expenditures, but there is a longer term requirement to add City staff, in the ATS Customer Services unit, each year to 2014, to a total of 8 new full time equivalent staff, to meet expected 56% growth in service demand over the 5 year period.

**Legal:** There are no legal implications arising from the Recommendations which have not been identified in previous associated Reports.

### HISTORICAL BACKGROUND

Staff first reported to Council on the subject of ATS Eligibility and Registration policy in Report PW03128, in August 2003. The initial report was instigated primarily from two issues. The first being a recognized requirement to bring the City’s policy respecting eligibility for Specialized Transit services into compliance with the Ontarian’s with Disability Act (December 2001). Secondly, Council was seeking advice from staff on how to address the rapidly escalating cost of this program and growing community complaints from an unacceptable level of program trip booking capacity. Finally, the report recommended referral to Council’s Advisory Committee for Persons with Disabilities (ACPD).

Staff reported back to Council in Report PW03128a, in January 2004, reflecting the findings of the consultations with ACPD. Over the course of time it was becoming increasingly evident the estimated cost of implementing the policy change was growing at a rate that consistently exceeded prior forecasts due to the combination of a number of factors including: anticipated program growth forecasts in the newly eligible clients...
arising from the evolving interpretation of the definition of eligibility, aging population, increased awareness of the program in the disabled community, dissolution of parallel transportation programs within the community, and costs of administering the program at existing service levels were growing beyond annual net levy expectations. Council referred further consideration of this initiative to the 2004 budget deliberations. Budget deliberations concluded that there was insufficient funding available for implementation at that time.

Staff subsequently reported to Council in PW03128(b), May 2007. At that time, Staff recommended adoption of the policy and a phased-in approach to implementation. The policy was approved in its entirety, with one notable exception. The one exception to adoption of the policy was the recommendation to reassess the existing clients under the new policy. While the reassessment would ultimately result in substantial future budget pressure mitigation, it would also have displaced a number of clients that had come to rely on the service over a period of years. Notwithstanding, ACPD did support and recommend the reassessment based on equity, fairness and the opportunity to create new capacity from the existing budget for the newly eligible clients with no other affordable means of transportation.

Described as Phase 2 in PW03128(b), a study was carried out on behalf of the City by Nelson-Nygaard Consulting Associates. The study reached a number of significant conclusions, which are detailed in the Executive Summary attached as Appendix A to this Report. This report provides the analysis and recommendations for implementing necessary service changes over a four (4) year period starting in 2011. There is an unprecedented anticipated influx in demand that will result from the changes in the policy, as well as concurrent increases due to general growth in senior and disabled demographic groups, and those increases anticipated from enactment of further Accessibility for Ontarians with Disabilities Act (AODA) legislated standards. As well, there has been a growth in the number of un-accommodated trip requests on Disabled and Aged Regional Transit System (DARTS) service within the latter half of 2009, which was not identified at the time of the Study but will require address with the other identified new demand.

At the time of Report approval, Council provided specific direction that “all existing ATS registrants not be reassessed under the new policy and registration procedures”, which introduced significant financial and community issues to be dealt with prior to final implementation of the policy.

**POLICY IMPLICATIONS**

A key driver in the Public Works “Innovate Now” plan is to develop and deliver services our communities connect with and trust; this proposal achieves this objective while respecting priorities that ensure business planning processes are defined and aligned, and that develop a multi-year budget process that is short, defined, predictable and well-communicated to stakeholders. The recommendations deal with introduction of the
5 year budget requirements for Council consideration, while addressing current 2010 budget priorities within existing approved funds.

**RELEVANT CONSULTATION**

Consultation has been undertaken with the Project Steering Committee comprised of City staff including the City Access and Equity Office; community stakeholders including members of the Advisory Committee for Persons with Disabilities and Seniors Advisory Committee; interested members of the public through two Public Information Centres; DARTS; and Public Works staff including Finance & Administration.

**ANALYSIS / RATIONALE FOR RECOMMENDATION**

The Nelson\Nygaard study developed a demand forecast based on growth due to three significant factors:

- Eligibility Changes
- Growth in seniors and persons with disabilities served by the ATS program
- Service Changes anticipated under AODA Transportation Standard requirements

The demand forecast was inclusive of the potential impacts of reassessment of existing registrants. The inclusion of this possible mitigation measure within the demand forecast was recommended by the consultant, given the substantial impact of not reassessing existing registrants on the cost requirements going forward from implementation.

Also included in the demand forecast is the current minimum level of unmet demand within the existing service structure.

**TABLE 1 Demand Forecast**

<table>
<thead>
<tr>
<th></th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
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<tbody>
<tr>
<td>Base</td>
<td>426,585</td>
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<td>426,585</td>
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<tr>
<td>Unaccommodated Current Demand</td>
<td>17,063</td>
<td>17,063</td>
<td>17,063</td>
<td>17,063</td>
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<tr>
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<table>
<thead>
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<tr>
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<td>667,381</td>
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<td>17%</td>
<td>33%</td>
<td>50%</td>
<td>56%</td>
<td>56%</td>
</tr>
</tbody>
</table>

Costs developed based on the demand forecast have been based on assumptions including:

*Vision: To be the best place in Canada to raise a child, promote innovation, engage citizens and provide diverse economic opportunities.*

*Values: Honest, Accountability, Innovation, Leadership, Respect, Excellence, Teamwork*
Service delivery costs specific to growth due to the new eligibility policy are estimated at about $3M in 2013, when substantial initial registrant take-up under the new policy is achieved. This is consistent with the estimate of $2.6M reported in 2007, allowing for cost growth within the program.

While the nature of the demand (i.e. ambulatory or requiring assistive device) can only be determined as new registrants are taken on to the service, costs have been configured based on the existing service delivery model through DARTS, and on the assumption that immediate new registrants in 2011 and 2012 would be predominantly ambulatory (e.g. those with cognitive, visual and psychiatric disabilities), while those resulting from true growth in population would continue to be a mix of ambulatory and non-ambulatory. Some mitigation of costs may be achieved if service strategy recommendations of the consultant can effectively be put into practice, including:

- A coordinated approach to mobility
- Further improvements to Conventional Fixed-route Transit accessibility
- Community bus and flexible bus services
- Feeder service (transfers from specialized transit to fixed-route bus)

Vision: To be the best place in Canada to raise a child, promote innovation, engage citizens and provide diverse economic opportunities.
Values: Honest, Accountability, Innovation, Leadership, Respect, Excellence, Teamwork
Partnerships with human service organizations
- Fixed-route fare incentives
- Travel training
- Efficiency measures
  - More efficient trip scheduling
  - More efficient driver scheduling
  - Optimal use of taxicabs
  - Using more small vehicles, including sedans
  - Modified policies for spontaneous trips
  - Overbooking (as practised by airline companies to account for cancellations)
  - Automatic Vehicle Location and digital dispatching (MDT)
  - Shortening the advance reservation period

At this time, there is an approved allocation from Provincial Gas Tax of $850,000, of which approximately $500,000 may be utilized to provide on-street service, the remaining $350,000 being required to carry out 3rd party functional assessment, travel training, and program support associated with the approximately 2,600 annual registrants to the program.

At this time, there is no approved allocation of funds to purchase new fleet to meet expanded service requirements in 2010 and beyond. Capital funding requests will be brought forward in each budget year to identify necessary fleet expansion associated with increasing trip levels. Cost projections through 2014 include necessary contribution to reserve to maintain fleet levels once the initial purchases are done through capital initiatives.

**ALTERNATIVES FOR CONSIDERATION**

The Recommendations to this Report set out costs that are projected to be incurred when the revised policy and registration procedures are implemented.

These projected costs might be mitigated in part by reconsideration of Council’s previous direction that “All existing ATS registrants not be reassessed under the new policy and registration procedures.” The previous Report presentation by staff to Committee had clearly identified reassessment as being desirable from both cost mitigation and equity perspectives, and reconsideration of Council direction on reassessment is strongly recommended by both the consultant and the Project Steering Committee for reasons of equity.
CORPORATE STRATEGIC PLAN

Vision:
To be the best place in Canada to raise a child, promote innovation, engage citizens and provide diverse economic opportunities.

Values:
Honest, Accountability, Innovation, Leadership, Respect, Excellence, Teamwork


Financial Sustainability
- Effective and sustainable Growth Management
- Growth in program is managed under comprehensive 5 year plan.

Growing Our Economy
- An improved customer service
- Customer services are funded and delivered to meet growth in demand.

Social Development
- People participate in all aspects of community life without barriers or stigma
- Accessible Transportation Services that support community inclusion.

APPENDICES / SCHEDULES

Appendix “A” to Report PW03128c - Nelson\Nygaard Consulting Associates, Final Report: Implementation of New Eligibility Policy at Accessible Transportation Services; Executive Summary
CITY OF HAMILTON

Implementation of New Eligibility Policy at Accessible Transportation Services
Final Report

August 2009
Executive Summary

Overview and Goals

The City of Hamilton, through its Transit Division, provides an extensive, accessible fixed-route transit system known as The Hamilton Street Railway Company or HSR, which covers about 650 sq. km.; and specialized transit services through its Accessible Transportation Services or ATS section which services the entire 1100 sq. km municipality by means of a contracted operator, DARTS (Disabled and Aged Regional Transit System), as well as a substantial taxi scrip program. In addition, transportation services are provided by a variety of human service agencies throughout the community. Despite the current network of transportation services, many people with disabilities remain unserved or underserved due in part to the limitation of the Conventional Fixed-route Transit service area, capacity constraints of the Specialized Transit system, and the current limitations of Specialized Transit eligibility.

Transit administrators articulated a vision as early as 2003 to design and implement an in-person eligibility process that would support the goal of identifying ability and potential for fixed-route use, and serve as a tool to place the individual on the least restrictive mode of public transit for each trip, based on personal ability, and the accessibility of the environment and the transit system. This approach to eligibility is an essential component of mobility management.

Rationale for Revising the Eligibility Screening Process

Four compelling trends call for the revision of the current eligibility process:

1. Implementation of full HSR fleet accessibility by June 2009 will create options for riders with disabilities that have not previously existed in the City of Hamilton,
2. Current specialized transit service is already significantly constrained, with trip denials and an unquantified level of discouraged demand,
3. The service is likely to be far more constrained when additional eligibility categories are added to comply with the Accessibility for Ontarians with Disabilities Act (AODA), and
4. Demographic trends, particularly the rapid increase in the over 85 age cohort, will place an even greater strain on current resources.

Study Methodology

The Nelson\Nygaard team initially documented eligibility screening practices at the City of Hamilton, which included a series of interviews with City and contractor staff, in addition to meetings with the Steering Committee and key stakeholders in the community. The team provided an assessment of the strengths and weaknesses of the current screening process, and then developed recommendations for changes which would support a process based on assessment of functional abilities.

Following review of the recommendations with City staff, the team presented the recommended policy to the Steering Committee. Steering Committee members played an active role at key points in the study, including meeting with the study team, providing input on draft documents, and making presentations at the public information meetings. The Committee consisted of representatives from the Advisory Committee for Persons with Disabilities (ACPD), Seniors Advisory Committee (SAC), City of Hamilton Access and Equity Office, and service agencies.
such as the Salvation Army – Lawson Ministries. The Committee provided solid support for the recommended approach, with minor modifications which were incorporated before public review.

The recommendations were then presented at a Public Information Centre (PIC) attended by over 60 members of the disability and human service agency communities. Key areas of feedback provided at the PIC regarding HSR’s viability as an alternative to specialized transit services resulted in an expanded set of team recommendations that included a series of steps that should be considered by HSR to enhance fixed-route accessibility, as described later in this Executive Summary.

The revised eligibility recommendations, projected ridership increases and recommended service strategies were all presented at a second PIC in March 2009. Input from that PIC has been incorporated into this report.

**Eligibility Policy Proposals**

The key element in the team’s recommendations is the introduction of in-person functional assessments for all new applicants. This model, increasingly in use by transit agencies throughout North America, generally takes the form of an interview with a transit agency staff person, followed by an assessment of an applicant’s ability to perform the tasks needed to take a bus. The latter assessment would be conducted by a contracted rehabilitation therapist, and will be limited to those applicants whose eligibility cannot be readily determined solely based on the interview. While the majority of functional assessments will be conducted for people with physical disabilities, the report also provides guidance for assessments of those with cognitive disabilities, and recommends that a separate process be used for those with psychiatric disabilities, seizures, Alzheimer’s type dementia, and visual impairments. The report provides a detailed discussion of the steps needed to implement functional assessments.

Some of the critical questions addressed in the eligibility policy proposal include whether all new applicants should be expected to come in for an assessment; whether existing customers need to be recertified; and how the recommended approach might affect HSR’s fixed-route policies. These are briefly discussed below, and in greater detail in the body of the report.

**Requirement for all New Applicants to Participate in a Functional Assessment**

An eligibility process which is equitable and consistent is one which has the same requirements for all new applicants.

The proposed policy recommends that all applicants for Specialized Transportation Service will apply in person, ensuring decisions that are based on objective, functional criteria directly linked to key minimum abilities essential to the use of fixed-route transit, including getting to and from the bus and navigating the system.

**Recertification of Existing Specialized Transit Customers**

In order to meet the goal of an equitable process which creates a level playing field and consistency of outcomes, this report recommends that existing Specialized Transit eligible customers will be required to undergo a recertification process. A reasonable approach to this task could be to establish an expiration date of 18-24 months for all current Specialized Transit customers. This cushion provides ample time to notify and plan for rectification of current customers, yet avoids criticism of permanent “grandparenting” which has been described locally as inequitable and difficult to defend.
Recertification can be designed to “screen in” current customers who, based on the information provided in a recertification form and supporting documentation from professionals, clearly meet the criteria for Unconditional use of Specialized Transit. These individuals would not be required to participate in an in-person interview or functional assessment. Requiring 100% in-person participation in the initial recertification has the advantage of equity, but also adds considerable cost and length of time in which the process will be completed.

Besides meeting the goals of equity and consistency, recertification is also an important cost-mitigation measure. Failure to recertify existing customers would mean that individuals who have been granted full eligibility under the existing screening process will continue to ride Specialized Transit indefinitely, even though they may be able to use fixed-route service for at least a portion of their trips. Considerable cost savings will be realized if even a small percentage of current riders shift their trips to fixed-route service due to the recertification process. Trip rate estimation within this report indicates there is a requirement for about 50,000 more annual passenger trips in the event of no recertification being undertaken, with a cost in the $800K to $1,300K range based on current trip costs as determined by Transit staff.

Potential Eligibility Outcomes Resulting from Proposed Eligibility Process

A number of different eligibility outcomes will be possible as a result of the proposed eligibility process. Categories of eligibility include:

1. **Personal eligibility**, (which can be any of the following):
   - **Unconditional**
     The registrant is not able to independently used fixed-route transit now, and their ability is not likely to improve. This person would be eligible for Specialized Transit for all trips
   - **Conditional**
     Registrants with this eligibility determination are able to used fixed-route service under some conditions. Specific conditions of eligibility will be determined which reflect the most limiting condition of the individual, the environment and the transit system. Individuals with conditional eligibility are expected to use fixed-route transit unless one of the conditions exists which prevents travel on fixed-route.
   - **Temporary (Transitional)**
     Persons will be granted 3-12 months of eligibility for a temporary condition that is expected to improve or to enable participation in Travel Instruction or Orientation and Mobility training to learn to use the fixed-route system.
   - **Not Eligible**
     Some applicants will be found ineligible because their disability does not prevent them from getting to or from bus stops, boarding buses and navigating the fixed-route system.

2. **Trip eligibility** is applied to trip requests from individuals with Conditional eligibility as part of the trip screening process
   - To accurately determine whether particular barriers would prevent the individual from using fixed-route service for the trip planned
   - To support and facilitate an individual’s use of fixed-route transit service
Anticipated Influx in Demand

The new eligibility process proposed in this report is likely to result in an increase in eligibility applications. Under the proposed AODA rules, eligibility will be based entirely on ability to use transit, and not on use of mobility aids or any particular diagnosis such Alzheimer’s or need for dialysis. The new process will enable many people to qualify for Specialized Transit services who are not eligible under the current policy, or who are only eligible for Taxi Scrip. This group is likely to include many people with developmental, visual, and psychiatric disabilities, as well as some people with mobility limitations who do not use mobility aids. Somewhat balancing this trend is that the new process will examine each individual’s application much more carefully, so that some people who are currently eligible, should they have their eligibility status reviewed, may be found ineligible or only conditionally eligible. In addition, with the expansion of Accessible Low Floor (ALF) transit service, some mobility aid users may no longer be eligible, or may be conditionally eligible, meaning that they will be eligible only for certain trips or at certain times.

In order to estimate the impact of the new process, the team examined data from the current registration rolls and also from the 2006 Participation and Activity Limitation Survey (PALS) conducted by Statistics Canada. In addition, population forecasts by the Ontario Ministry of Finance were used to estimate growth in the eligible population.

Finally, likely growth in demand has been estimated by taking into account the eligibility changes, population growth, and service changes that will be needed to comply with the Accessibility for Ontarians with Disabilities Act (AODA).

The results of this analysis suggest that the combination of eligibility policy changes, demographic shifts, and service improvements to comply with the AODA will result in an increase in demand for DARTS service of 31% by 2013, with an anticipated increase in costs of approximately similar magnitude, due to the need for increased vehicle fleet and operators.

Figure ES-1 Unconstrained Demand Forecasts – Low
In the event that there is no review of current registrants’ eligibility, and if AODA requires the reduction of current trip denial rates to much lower levels, then the anticipated increase in trip demand is estimated at 55%.

**Figure ES-2 Unconstrained Demand Forecasts – High**

These are *unconstrained forecasts*, meaning that they assume that the City and contractors are able to put in place any capacity needed to accommodate the expected increases in demand, such as additional staff, vehicles and facilities. It assumes that conditional eligibility is effectively implemented, and that the City’s Accessible Low Floor bus service is able to provide attractive, reliable service that is easily usable by people with disabilities. Demand growth could be much lower if other strategies to address service requirements are adopted.
Service Strategies to Address Increased Demand

Since the City’s resources are limited, a variety of steps will need to be considered that may reduce resource requirements, reduce the cost of those resources, or meet more trips within available resources.

While the most important step remains the implementation of an accurate eligibility screening process, along with trip-by-trip eligibility screening in daily specialized transit operations, there are a number of additional demand management strategies that are examined in this report which may effectively mitigate some of the impacts of demand growth. These include:

- A coordinated approach to mobility
- Improvements to Conventional Fixed-route Transit accessibility
- Community bus and flexible bus services
- Feeder service (transfers from specialized transit to fixed-route bus)
- Partnerships with human service organizations
- Fixed-route fare incentives
- Travel training
- Efficiency measures
  - More efficient trip scheduling
  - More efficient driver scheduling
  - Optimal use of taxicabs
  - Using more small vehicles, including sedans
  - Modified policies for spontaneous trips
  - Overbooking (as practised by airline companies to account for cancellations)
  - Automatic Vehicle Location and digital dispatching (MDTs)
  - Shortening the advance reservation period

A number of the above strategies address key issues that were raised by participants in the two PIC’s that were held during the course of this study. Particular to demand management strategies dealing with a coordinated approach to mobility, Transit should consider conducting a full policy review of fixed-route and Specialized Transit policies to ensure that they are consistent, mutually supportive, and encourage the use of the Conventional Fixed-route Transit service. Areas to be addressed:

- Fixed-route operator assistance
- Fixed-route boarding policies in crowded conditions
- Guarantee of a seat before the bus moves
- Availability of wheelchair securements on fixed-route upon request
- Fixed-route transfer locations, available supports and amenities
- Fixed-route fare incentives
- Policies regarding strollers, shopping carts and other non-mobility aids which block aisles and access to securement and priority seating.
As part of the eligibility process, include functional ability to independently board low floor buses from the street as opposed to the curb until such time as policies requiring bus operators to assist are in place.

- Conduct a bus stop inventory that includes the accessibility and amenities of important stops along key routes and near trip generators.

- Consider implementing limited Specialized Transit feeder to fixed-route service, or notifying customers with conditional eligibility that feeder service may be required for some trips.

- Provide ongoing feedback to fixed-route operations regarding barriers to use by people with disabilities, such as overcrowding. Make ongoing transit evaluation and service development multi-modal, including Specialized Transit and Conventional Fixed-route Transit as partners in the service delivery system.

- Consider conducting a community wide education and public relations campaign regarding accessibility, and how all HSR users have a part to play.

### Travel Training

North American transit agencies increasingly view the establishment of travel training programs as an integral step in the enhancement of eligibility screening programs. While it is important to conduct outreach in the community to recruit individuals into training programs even before they consider applying for Specialized Transit, eligibility screening programs also create an opportunity to identify individuals who could potentially benefit from travel training. This is particularly helpful for those individuals who have been determined conditionally eligible or denied eligibility.

The final chapter in the report presents an overall plan for implementation of a travel training program. A detailed guide for implementation of this program has been provided to the City as a separate document. In the development of the travel training plan, key assumptions have been built into the proposed travel training model, including:

- It is easier to convince individuals to try public transportation before they explore paratransit as an option.

- Orientation and Mobility Training for low and no-vision participants must be performed by a qualified Orientation and Mobility Specialist.

- Individuals cannot be forced to ride public transportation or participate in a travel training program.

- A travel trainer’s expertise can be used as part of an eligibility determination.

- The success of a travel training program is contingent upon continued improvements in the accessibility of the fixed-route service.

- The proposed travel training model is based on a framework for a coordinated mobility support program which includes: consumer education and outreach; fixed-route familiarization; group training; support of social service agency professionals; and one-on-one training.