



Hamilton

ACCESSIBLE TRANSPORTATION SERVICES REVIEW SUB-COMMITTEE

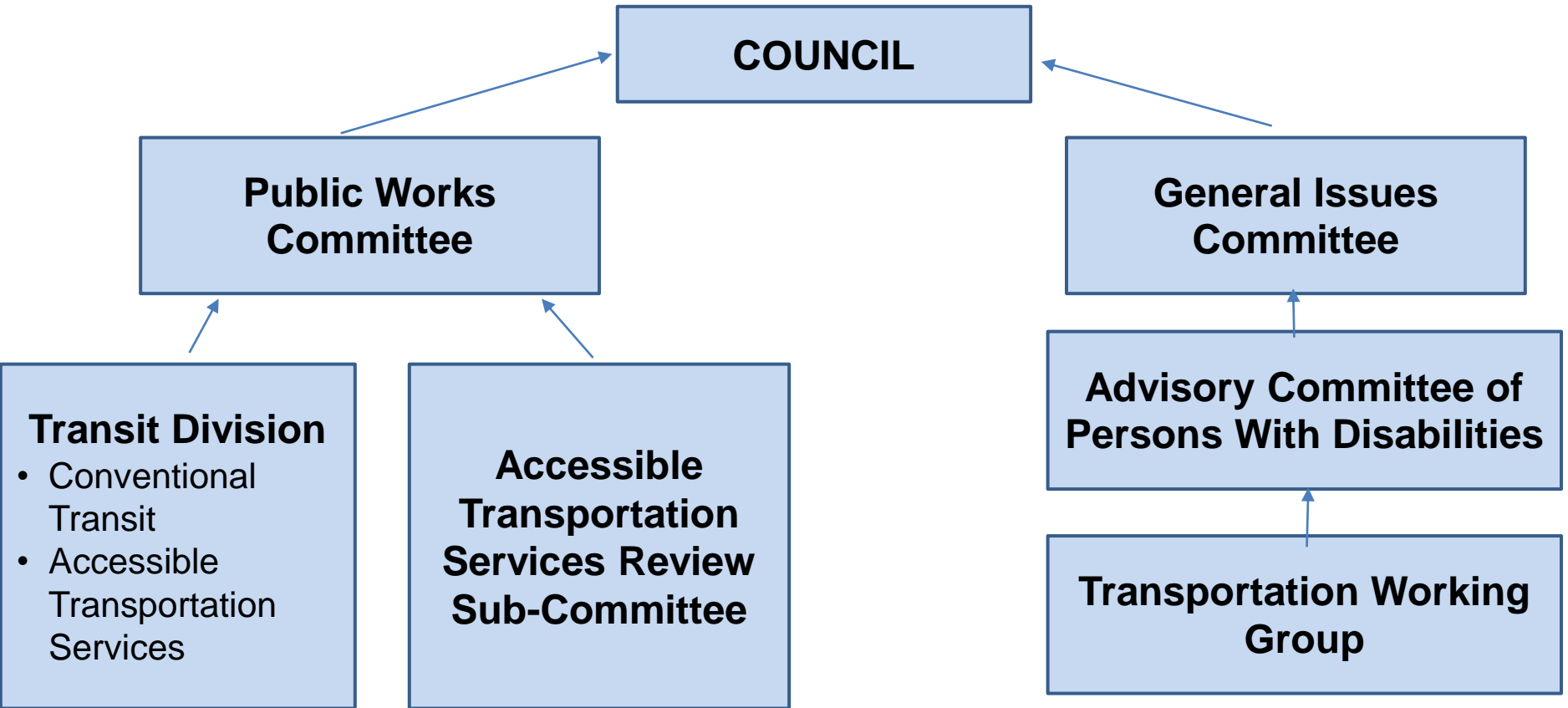
June 29, 2023

Agenda



- 1) Accessible Transit Services (ATS)
- 2) Legislative Review and Compliance
- 3) Opportunities for Improvement

Accessible Transportation Services (ATS) in Hamilton



Accessible Transportation Services (ATS) in Hamilton

TRANSIT DIVISION

Conventional Service
Fixed route scheduled service.

Accessible Transportation Services (ATS)

Specialized, door-to-door, shared ride service for people who are functionally unable to use conventional transit due to disability.



Contracted Vendors

- DARTS (shared ride service)
- Taxi companies (taxi scrip program)



ATS Customer Care

- Eligibility, including use of third-party assessor
- Client profile
- Ongoing customer care

Contractor (DARTS) Service Area Map



- Only required to provide specialized transit service to the edge of urban transit boundary, but we provide it to the City borders.

Accessibility Requirements for Public Transit Organizations

- The *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its associated Integrated Accessibility Standards Regulation (O. Reg. 191/11) provide the accessibility rules that municipalities need to follow when providing public transportation services.



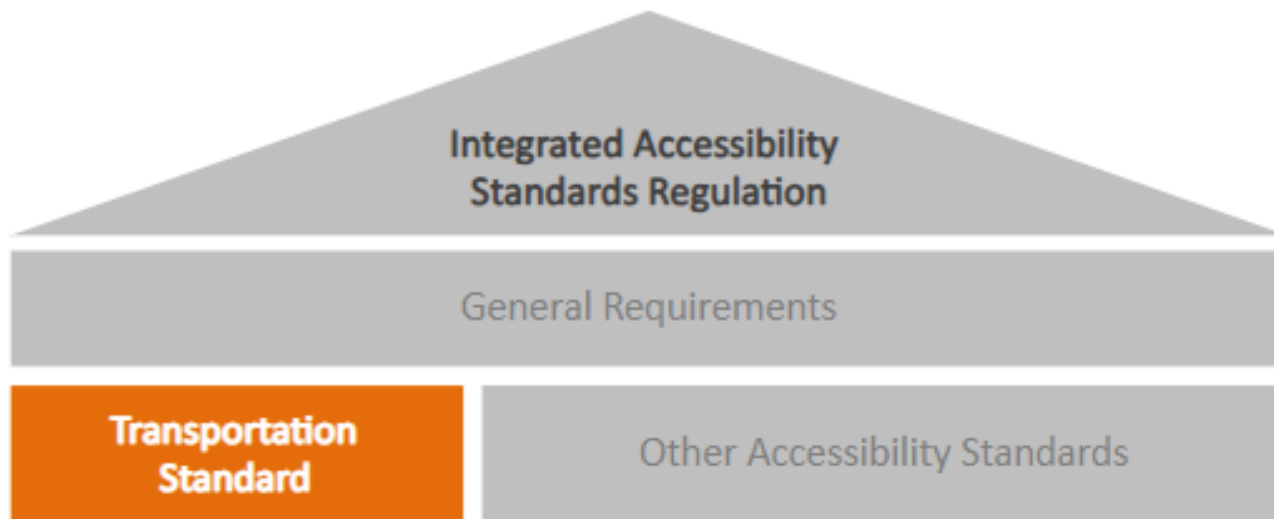
- In October 2021, the HSR and Accessible Transportation Services (ATS) were selected for a desk audit of 15 regulatory requirements from the Integrated Accessibility Standards Regulation (O. Reg. 191/11) by the Ministry for Seniors & Accessibility and found compliant.



COMPLIANCE

The Transportation Standard

- The Integrated Accessibility Standards Regulation (O. Reg. 191/11) contains a Transportation Standard, which sets out requirements for both conventional and specialized public transportation service providers.



Requirements for Public Transportation Service Providers

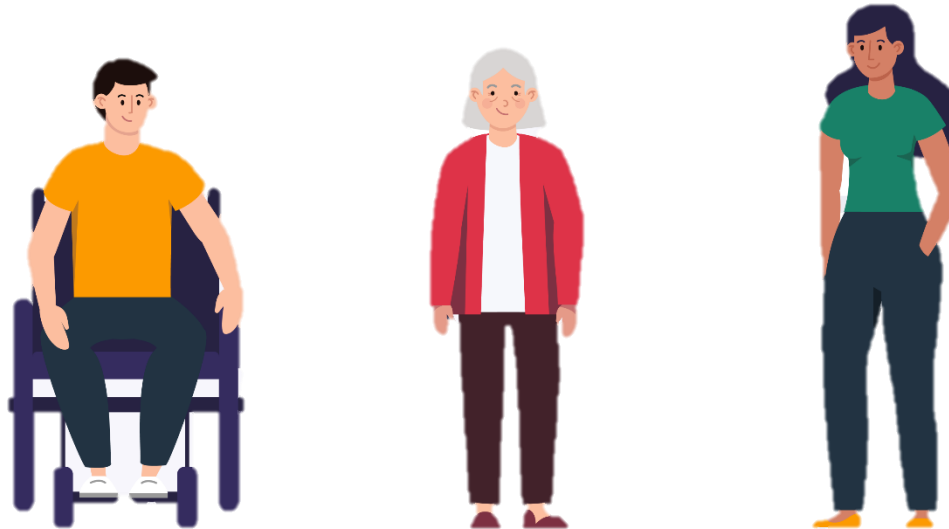
- There are some requirements common to both conventional and specialized transportation service providers, such as:
 - Making information available to the public on accessibility equipment and features of their vehicles, routes, and services.
 - Providing accessibility training to employees.
 - Not charging a fare to a support person accompanying a person with a disability when that person requires a support person.

Requirements for Specialized Transportation Service Providers

- However, there are specific requirements for specialized transportation within the Transportation Standard, such as:
 - establishing categories for eligibility
 - allowing people with disabilities to use specialized services because of an emergency or on compassionate grounds
 - fare parity
 - hours of service

Section 63 – Categories of Eligibility (O. Reg. 191/11)

- The intent of this requirement is that specialized transportation service providers will establish three categories for eligibility and use them consistently when people with disabilities apply to use the services.



Section 63 – Categories of Eligibility (O. Reg. 191/11)

- The three categories of eligibility are:
 - **Unconditional Eligibility** – People with disabilities that prevent them from using conventional transportation services.
 - **Temporary Eligibility** – People with disabilities that are temporary but prevent them from using conventional transportation services.
 - **Conditional Eligibility** – People with disabilities who are unable to consistently use conventional transportation services because of physical or environmental barriers, such as winter weather.

Section 63 – Categories of Eligibility (O. Reg. 191/11)

- Specialized transportation service providers may deny requests for specialized transportation to people who have been categorized as having temporary or conditional eligibility, if the local conventional transportation service is accessible, and the person can use it.



Section 63 – Categories of Eligibility (O. Reg. 191/11)



- Eligibility for Accessible Transportation Services (ATS) is based on a person's:
 - functional abilities (physical, cognitive and sensory)
 - environment (i.e., within walking distance to bus stop)
 - ability to use conventional public transit – Hamilton Street Railway (HSR)
- Similar to Hamilton, peer agencies require applicants to provide detailed information about the conditions that prevent them from using conventional transit and request medical verification.

Section 63 – Categories of Eligibility (O. Reg. 191/11)

COMPARATOR EXAMPLES

	Hamilton Street Railway	London Transit	Toronto Transit Commission
What conditions of eligibility are used by your agency?	<ul style="list-style-type: none"> • Unconditional (76%) • Temporary (18%) • Conditional (1%) • Ineligible rate is less than 1% of completed applications received for currently active clients in 2022. 	<ul style="list-style-type: none"> • Unconditional (88%) • Temporary (12%) • Ineligible rate is around 4% of applications received 	<ul style="list-style-type: none"> • Unconditional (58%) • Temporary (13%) • Conditional (64%) • Ineligible rate is around 1.5% of applications received

Source: Dillon Consulting - Review of ATS Eligibility Determination Process and Services Peer Benchmarking Summary (Oct. 2021)

Section 64 – Eligibility Application Process (O. Reg. 191/11)

- The intent of this requirement is that specialized transportation service providers will meet standard service requirements for people with disabilities during the application and appeals process for specialized transportation services.
- Specialized transportation service providers have 14 calendar days upon receipt of a completed application for eligibility to make a decision on the application. The applicant is granted temporary eligibility if a decision cannot be made by the end of the 14-day period.

Section 64 – Eligibility Application Process (O. Reg. 191/11)

- Specialized transportation service providers may re-assess, at reasonable intervals, the eligibility of people with disabilities who have been given temporary eligibility.
- Example: A person who breaks both legs in an accident may require specialized transportation services for several months. Once their legs have healed, however, they may begin to use conventional transportation services once again.

Section 64 – Eligibility Application Process (O. Reg. 191/11)

- Specialized transportation service providers are required to establish an independent appeal process to review their decisions on eligibility.
- Decisions on appeals with respect to eligibility must be made within 30 calendar days after receiving the completed appeal applications. If the 30-calendar day deadline is not met, applicants have temporary eligibility until final decisions are made.

Section 64 – Eligibility Application Process (O. Reg. 191/11)



- Accessible Transportation Services (ATS) is fully compliant with Section 64 of (O. Reg. 191/11), but has opportunities to improve the way in which eligibility applications are processed.
- Eligibility reassessments were recommended by the Office of the Auditor General, following an Accessible Transportation Services (ATS) Eligibility Audit completed in December 2020 (see Report AUD20009)
- Dillon Consulting Limited echoed this recommendation in Report PW21055.

Status of Eligibility Reassessments at ATS

Hamilton has not reassessed eligibility.

- ATS is about to request updated applications from clients with files older than 2-5 years, with no reassessments during this exercise at the direction of Council.
- ATS has contracted to a third-party provider for functional assessments of eligibility as needed
- ATS updated appeal process about to be actioned

Section 71 – Bookings (O. Reg. 191/11)

- The intent of this requirement is that specialized transportation service providers will provide same day service, to the extent that it is available, and accept bookings for service as close as possible to the date requested.



- Contractor (DARTS) reservations are open the same hours as on-street service.
- Call routing and call handling is the responsibility of the contractor.

Opportunities for Improvement

- The City of Hamilton, through the ATS section of the Transit Division, is meeting all legislated specialized transportation service requirements and providing service within legislative obligations, but there is opportunity for improvement.
- We strive to be a fully integrated system to increase transit options for everyone and effectively divert trips to conventional transit for those able to use it while ensuring access to specialized trips for those who need them.

In the past several years, there have been a multitude of reports from both consultants and the City Auditor, and feedback from users that all call for significant improvements to the accessible transportation services.

- [AUD20009](#) – Auditor General - ATS Eligibility
- [PW21055](#) – Consultant - business case for key AUD20009 recommendations
- [AUD22007](#) – Auditor General – contractor vehicle safety
- [PWC22079\(b\)](#) and [\(c\)](#) - ATS Quarterly Performance Reports

- Staff is responsible for reviewing and recommending next steps on these outstanding reports, will provide the roadmap for change.
- Conduct a (Re)Envision voice of customer engagement activities on specialized service (fall 2023).
- The next report back is slated for the Public Works committee in Q4 of this year.

Questions / Comments?

