



FOR IMMEDIATE RELEASE

HUMAN RIGHTS AUTHORITY - PEORIA REGION
REPORT OF FINDINGS

Case # 19-090-9022
Connect Transit

INTRODUCTION

The Human Rights Authority (HRA) opened an investigation after receiving a complaint of possible rights violations towards the Connect Transit bus company. Complaints alleged the following:

1. Lack of ADA accessible bus stops for riders with a disability.
2. Improper use of the paratransit company by dropping fixed bus routes to force individuals with disabilities to use the alternative transportation system.

If found substantiated, the allegations would violate the Americans with Disabilities Act (ADA) (28 CFR 35) and other regulations that govern public transportation companies.

Connect Transit serves the incorporated area of Bloomington-Normal as the public transportation bus system. The company operates independently and is governed by a board appointed by the City of Bloomington and Town of Normal. Four members of the board are from the City of Bloomington, three members are appointed by the Town of Normal, with two ex officio members. Connect Transit owns approximately 40 buses for fourteen fixed routes. The fixed route buses or “long buses” all have a wheelchair lift. Connect Mobility is the paratransit branch of the company and they have approximately twenty vans used for curb to curb transportation for individuals with accessibility needs. The bus company serves 2.4 million passengers on their fixed bus route since June 2019 and have 20,000 unique riders in this number. Unique riders are people who ride the fixed route bus sometimes, not on a regular basis. The paratransit service has 750 active riders and has made 90,000 paratransit trips. The company employs 135 people with 90 of those being bus drivers for the fixed route buses and paratransit vans.

COMPLAINT STATEMENT

The allegation states that the bus stops in the Bloomington-Normal area are not ADA compliant. The bus company no longer stops on private property so individuals with a physical disability who use a wheelchair, and need to go to the hospital, are being

dropped off on the edge of the hospital parking lot and they must use their wheelchairs to get all the way to the entrance. Another example of concerns with ADA compliant bus stops was that individuals with low vision or are vision impaired, are being dropped off at a bus stop that requires them to step directly into a ditch. Additionally, the way bus routes are currently structured makes riders with disabilities pay extra to use the paratransit services provided. There are concerns that the bus company is dropping routes to low income neighborhoods that house a large population of people with disabilities and stating it is being done based on ridership numbers. This is forcing some people with disabilities to use the paratransit system.

FINDINGS

Staff Interviews (9.5.19)

The HRA facilitated a site visit at Connect Transit in Normal, Illinois. The HRA met with three individuals who are in management with the company. Connect Transit is a public transportation company, and because of this, the company is not able to make any changes to their fixed routes without public notification and input from the community. The company is funded by federal, state and local grants, and income from ride fares. The bus routes are identified by colors: Red line, Pink line, Yellow line, etc. The company eliminated one route in July 2019, the Olive route, due to low ridership numbers. This route went from Orlando Avenue past Ft. Jesse Road, to a neighborhood area and then turned around at Jacobsen Drive. This was all presented in the public forum before changes were made. The bus company did receive feedback from community members and local agencies that were impacted with the elimination of this bus route. The Olive route was their fifteenth bus line that was eliminated from service. The company did change their pink line route to meet the transportation needs of an apartment complex off Orlando Avenue. This area of town has approximately 800 rides for paratransit riders per year. This number is established based on individuals who have a bus pass for individuals with a disability and by the company monitoring how many times the wheelchair ramp is deployed. Staff explained all route changes must have time kept in mind. The fixed bus routes run on fifteen minute, thirty minutes and one hour scheduled times. The company does not drive their fixed route long buses onto private property. Examples of where they would not drive their buses are hospital parking lots or large box store parking lots. This practice has been in effect since 2015. This change was made due to safety concerns for pedestrians, keeping route times on schedule and because the size of the long buses presents more of an accident risk. If an individual with a disability needs public transportation, they can ride the fixed route, long buses because all buses are accommodated with a wheelchair lift. The data from electronically monitoring the lifts are collected through the computer programming installed in the bus. If a person is using the fixed route, long bus to attend a physician's appointment at the hospital, the bus would drop the rider off at the bus stop that is on the public street and the rider, if using a wheelchair, would have to navigate themselves to the front door of the hospital. If using Connect Mobility, the rider would need to schedule their ride twenty-four hours ahead of the scheduled appointment. The paratransit van does

transport from curb to curb and would pick the rider up from the scheduled pickup location and take them all the way to the hospital front doors or large box store.

Connect Transit stated that not all bus stops in the Bloomington-Normal incorporated area they serve are ADA compliant. Since March of 2018 the company has had a public awareness campaign called the "Better Bus Stop" Campaign to provide transparency to the community about the goal of making all bus stops ADA compliant within the next three years. The company has 500 bus stops and feels that $\frac{3}{4}$ of them have reasonable accommodations and/or are ADA compliant. Staff explained that the planning for improving bus stops is not done quickly. There are many entities involved in the permitting and construction of a bus stop to meet ADA requirements. The company discussed two issues in the site visit they are working on. One issue is the challenges individuals riding the fixed route long buses face when they are dropped off at the local hospitals. The bus does not enter the parking lot of the hospital. The public transportation needs have often been an afterthought when construction changes are being made at places such as a hospital. The bus company tries to reach out to the location and ask that they keep in mind public transportation needs when they are making changes. This does not always work. The bus company staff are involved in a joint effort to make a bus stop on the west side of one of the local hospitals a heated shelter stop but is still in negotiations. The company works with state, county, city, and private property owners when changes are being made to the bus stops. ADA accessibility laws require, at a minimum, a reasonable modification. The bus company has prioritized the bus stop changes based on ridership and usage. The bus stops that are out of compliance have no sidewalks or the sidewalk is in poor shape. The local municipalities control the sidewalk areas, so the company must negotiate with the city or town on fixing the sidewalk before improvements can be made. An ADA compliant bus pad can cost thousands of dollars. Connect Transit can pour a concrete pad that is compliant with ADA regulations, but safety is often a primary concern and if there is no sidewalk or the sidewalk is not in good shape, and the curb has to be cut out, riders would have to access the bus stop from the street, which is a safety concern. The Connect Transit staff involved in the site visit were not aware of any specific bus stop that a person with low vision was having difficulty using. They did guess at one that could potentially be a problem and explained that this area is a large business area with a big box store and several fast food restaurants. The bus stop allows -riders exit into a grassy area that could be a stepdown and people would then cross the street to access the businesses. They have approximately 400 riders per day at this stop. The area where the bus stop is located is state property and Illinois Department of Transportation was working on the road which restricted Connect Transit's ability to obtain a permit to work on the bus stop. This bus stop has since been upgraded in the last few months.

With the public awareness campaign created in March 2018, the company is expecting more complaints regarding bus stops not being ADA compliant. Complaints come to the attention of the bus company General Manager in a variety of ways: via the Mayor's office, council person's office, directly to the governing board and directly to Connect Transit. The bus company does offer a customer service line that riders can call if they need to file a complaint specific to a bus stop. If a fixed route bus stop does not meet a rider's accessibility needs then they automatically qualify for the Connect Mobility paratransit service. The rider does have to complete an application to ride the

paratransit even if they are dealing with a temporary disability. They are automatically qualified even while the application approval process is pending, which takes an average of 21 days to approve or deny. Many riders receive assistance with completing the application from other community providers. A common complaint from riders who use paratransit services is that they must schedule the ride a day ahead of time.

Bus fare cost is another issue that was discussed at the site visit. The allegation states that people who use the paratransit company are being forced to pay a higher share than traditional fixed route bus riders. The current cost to ride a fixed route bus one way is \$1.00 for a nondisabled rider and \$.50 for an individual with disability that has a Connect Transit Pass. The company had proposed to raise the fixed rate bus route fares but due to pushback from the community, a Transportation Advisory Committee is reviewing fare changes and the board voted to not make any bus fare increase until January 2020. At this time, paratransit rides do cost more but is allowed by federal regulations. A thirty-day pass costs \$65.00 for unlimited rides, after the first ride, for eligible riders on Connect Mobility. Riders who need and qualify for financial assistance can access the Paratransit Connect Mobility application on the website to apply. There are local agencies in the area that also assist some riders with the application. Connect Transit has noticed that numbers vary with round trip ridership of Connect Mobility. An example why this occurs would be a rider uses Connect Mobility to attend a doctor's visit, but the appointment is over before the van is due to return, and the rider will take the fixed route bus back home. The company has made schedule changes to the fixed route buses and this has seemed to help more paratransit riders have better access to the long buses.

FINDINGS (Including record review, mandates, and conclusion)

Complaint #1 – Lack of ADA accessible bus stops for riders with a disability.

The HRA reviewed a memo written by the General Manager to the Board of Trustees dated March 27, 2018 with the subject line, Recommendation of Connect Transit Facility Guide and Three (3) Year Bus Stop Improvement Plan. This memo recommended that Connect Transit "...be authorized to use the Connect Transit Facility Guide and three (3) year Bus Stop Improvement Plan to install shelters, benches, and ADA compliant concrete pads. In 2018 the company had improved bus stop infrastructure at thirty-three (33) bus stops (out of 600)." This memo also has a discussion section that identifies that bus stop updates are prioritized by ridership numbers. The plan also states that some of the bus stop locations and plans for improvement are limited due to space and lack of sidewalks. Connect Transit acknowledges that they need to improve their bus stops to become ADA compliant which is why they have the public awareness campaign that is being implemented for bus stop improvements through grant monies allocated through federal, state, and local programs.

Connect Transit has also made all of their improvement and changes to bus stops and bus routes based on transit propensity. The HRA reviewed the company's Short-Range Transit Plan, developed by the McLean County Regional Planning Commission, which defines transit propensity as "...finding the locations that have the highest probability of people using and/or needing public transportation so that Connect Transit

can make sure those locations are being serviced ... includes finding high transit propensity populations and learning where they travel to ...” The Short-Term Transit Plan also reads “Current ridership is transit dependent. While transit becoming a mode of choice is a good long-term goal, Connect Transit should focus on serving those who are dependent on it in the short-term.”

The HRA reviewed a press release titled “Better Bus Stops for Bloomington-Normal Campaign First Year Summary” dated May 24, 2019 that provided information to the community about the progress of the campaign. This document states “...the bus company has improved 18 of 21 planned bus stops, installing shelters or benches, and accessible concrete pads connecting the curb to the sidewalk. The Better Bus Stop Campaign is prioritizing stops with existing sidewalks that have high customer usage.” The company has approximately 500 bus stops in the Bloomington-Normal area in 2019.

The HRA was provided with a copy of the Connect Transit Facility Guide Bus Stops and Shelters. This document outlines the guidelines the company uses for the bus stop improvements. The following improvements were set by this document for the Connect Transit Fixed Stop Locations. The plan states “ ... Stop spacing would be approximately every quarter-mile ... Stops are sighted considering ADA compliance and the path towards accessibility.” This same document outlines how the company determines a bus stop placement for their Connect Transit bus stop sign and provides information on their concrete pads which are required to be ADA accessible. This section is titled “Landing Pad Standards” and explains the following guidelines “Connect Transit will continue to improve ADA accessibility at each of its stops, with priorities on improving mobility with connections to existing sidewalks, off street paths, and other pedestrian facilities. In addition to stops with shelters, Connect Transit will work to outfit stops with the ADA approved bus stop pad of 96 inches by 60 inches, in addition to connecting to pedestrian facilities. The bus stop must have a total of 5 boardings or alightings per day to qualify for an ADA landing pad. Connect will review bus stops with at least 5 passenger boardings or alightings a day and prioritize the number of times the wheelchair lift has been used to reflect the highest to lowest priority.” All bus stops identified for improvement are attached to this guide. Each bus stop is priority ranked based on number of times the wheelchair lift has been deployed and estimated cost to make improvements. For fiscal years 2020 and 2021 bus stop improvement costs vary from \$400.00-\$12,000. The fiscal year 2019 Bus Stop Improvement Plan targeted 21 bus stops that were improved in the 2019 fiscal year, based on wheelchair deployment and cost between \$400.00-\$50,000 for improvements.

The HRA also reviewed internal policy titled Reasonable Accommodations. The policy reads “A reasonable accommodation is an adjustment made in a system to accommodate or make fair the same system for an individual based on a proven need. Individual needs can vary.” This policy also states how Connect Transit will accommodate a request. The guidelines for a reasonable accommodation state “The Fundamental nature of the services is not altered. It does not cause a direct threat to the health or safety of others. It does not result in an undue financial and administrative burden. The requestor would not be able to fully use the service provided without the accommodation.” The types of reasonable modifications requested that the company has made for riders on their fixed route buses are “positioning the bus for loading and unloading in a location where there are no obstructions, not forcing passengers in

wheelchairs to exit coach in grass if possible and allowing a person with diabetes to eat on the bus to avoid a drop in glucose. Examples of reasonable accommodations requests for their paratransit vehicles with Connect Mobility include: picking a rider up at a building entrance that is flat and unobstructed, helping an individual who is blind get to the front of the building in extreme weather.” The mission of the company when making reasonable accommodations, in summary, is to “...always use good judgement, maximum customer service and safety of the employee and public.”

If any riders need an ADA modification, they are able to contact the bus company via the customer service line or through an online request form on the Connect Transit website. The Connect Transit statement on ADA modifications is, “Connect Transit is committed to providing safe, reliable, courteous, accessible and user-friendly services to its customers. To ensure equality and fairness, Connect Transit is committed to making reasonable modifications to its policies, practices and procedures to avoid discrimination and ensure programs and services are accessible to individuals with disabilities. Requests for modifications can be made by....” Connect Transit’s Better Bus Stops Improvement Plan, that is referenced in their Short-Range Transit Plan, provides the guidelines for fixed bus stops, this information is gathered from Connect Transit’s Facility Guide that was also provided to the HRA for review. The guidelines are “Stop spacing should be approximately every quarter-mile. The ideal stop placement is on the far-side of an intersection, with some exceptions. Ideal length of a stop is 85 feet. Stops are sited considering ADA compliance and the path towards accessibility.” This same document provides a statistic for 67 bus stops needing improvements and 21 of these stops have shelters leaving 46 without shelters. Connect Transit’s Facility Guide states “Connect Transit will continue to improve ADA accessibility at each of its stops, with priorities on improving mobility with connection to existing sidewalks, off street paths, and other pedestrian facilities. In addition to stops with shelters, Connect Transit will work to outfit stops with the ADA approved bus stop pad of 96 inches by 60 inches, in addition to connecting to pedestrian facilities.”

The HRA also reviewed the FY 2019 Bus Stop Improvement Plan that notes 21 bus stops that were identified for improvements. According to the site visit information, Connect Transit was able to improve 18 of the 21 stops. Of these stops, 7 were documented to have the wheelchair lift used by their fixed route buses. It is unclear to the HRA which of the 3 stops were not improved and why they were not.

The HRA reviewed the Bus Stop Improvement Plan for the current fiscal year 2020. This list has 72 stops listed ranging in cost from \$400.00-\$12,500.00. Of the 72 listed, 5 of the stops identify the wheelchair lift being used on the fixed bus route service.

Lastly, the HRA reviewed the future FY 2021 Bus Stop Improvement Plan and on this list there are 63 bus stops identified. Of the 63 bus stops listed, 2 of the stops identify the wheelchair lift being used on the fixed bus route service.

Connect Transit provided four examples of responses to reasonable accommodation requests. The first documented an email request dated 6/28/19 asking for a “concrete walk to connect the bus stop to actual city sidewalk located at N. Main St. ISU alumni center location.” The Length of Request had been made “multiple times.” Connect reported to the HRA that the shelter and pad are not owned by Connect Transit and the company worked with the owners and Illinois Department of Transportation (IDOT) to get approval for the upgrades. A Letter of Transmittal dated 10/1/19 showed

IDOT approval from the consulting engineers to begin work on the requested bus stop. The company is now in the bidding process and has approval for the work permits on the identified bus stop until April 2020. The HRA was also provided three instances of a reasonable accommodation request being made at a fixed route bus stop. On 9/10/19, 9/13/19, and 9/29/19, on three different bus routes the bus driver adjusted the bus stop to allow boarding for an individual who was unable to use the identified fixed route bus stop. Connect Transit reports that one of the bus stops is identified for improvements and the bus company has incorporated a new system to document all reasonable accommodations made to their fixed route bus drivers during their routes. Connect reported that this will help them with future planning and adjustments needed for future bus stop improvements.

According to the ADA website (ADA.gov), the 2010 Standards for Accessible Design "... set minimum requirements – both scoping and technical -- for newly designed and constructed or altered State and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities." In the 2010 Standards, section 209.2.3 state that "On-street bus stops shall comply with 810.2 to the maximum extent practicable." Section 810.2 is referring to 36 C.F.R. Pt. 1191, App. D. where a chapter 8 has a section titled "810 Transportation Facilities". Section 810.2 provides standards regarding surface of bus stops, dimensions of bus stops, what the bus stop should be connected to, and slopes for the bus stops.

CONCLUSION:

The HRA concludes the first complaint alleging that Connect Transit lacks ADA accessible bus stops is **SUBSTANTIATED**. Connect Transit is aware of what bus stop improvements need to be made, which is why they created the Better Bus Stops Improvement campaign that began in March 2018 for fiscal years 2019, 2020, and 2021. Connect Transit has used transit propensity when determining the order of improvements. Their method was that a bus stop needed to have a minimum of 5 riders at a bus stop to be identified in their bus stop improvement campaign. The Better Bus Stops Campaign is in the second fiscal year. The expense of improvements varies from thousands of dollars to a few hundreds of dollars for a minimal ADA accessible concrete pad poured at 96 inches x 60 inches. The bus company does offer reasonable modifications to be requested through their website via email or a phone call to their customer service line. The bus company provided an example of an accommodation that was made when they ran the Pink line as a deviated route to the area of apartments requesting their fixed route service. The bus company also provided documentation to the HRA of an accommodation request that took several months to navigate the bureaucratic approval process as the bus stop was located on private property. The complaint also required state approval for the recommended improvements. As of 10/7/19 the company was given approval and the necessary permits to make improvements to the bus stop along with the property owner agreeing to the construction.

The HRA does not make any formal recommendations due to Connect Transit's awareness of their need to make bus stops ADA compliant and their Better Bus Stops public campaign that is currently in progress. The HRA would suggest that Connect

Transit follow the recommendations and key findings that their Connect Transit Short-Range Transit Plan identifies such as:

- To make Bloomington and Normal more transit supportive. Especially, to improve bus stop facilities and their accessibility, prioritizing those along major and minor transit corridors.
- To track all accommodations that are being made on their fixed routes to assist with future decisions involving ADA bus stop improvements made through the Better Bus Stop Campaign.
- Ensure riders have readily available access to the mechanisms (e.g. service line, on line report form) for reporting concerns or accessibility needs.
- When bus stop improvements involve other entities such as hospitals, city/county boards, ensure that contacts are made to facilitate the pursuit of accessibility.

Complaint #2 - Improper use of the paratransit company, dropping routes to force individuals with disabilities to use the alternative transportation system.

The allegations state that the way bus routes are structured, riders with disabilities must pay extra to use the paratransit services. The Connect Transit fixed bus routes and Connect Mobility van routes run Monday-Saturday from 5:45am until 10:00pm, with shorter schedules on Sundays, based on review of the Connect Transit website. The Pink line runs Monday-Friday every thirty minutes, Saturday thirty minute frequency, and on Sundays every sixty minutes, to meet the transportation needs of the riders. In the spring of 2019, Connect Transit presented to their governing board a proposal to eliminate one fixed bus route service referred to as the Olive Route. This route was identified as having low ridership and justified the cancellation as cost savings due to the low rider numbers. The route ran from Orlando Avenue in Normal to the Walmart in Normal. This information was presented in an open meeting and the public responded to the proposed cancellation of this route. In the summer of 2019, after public concern was voiced, Connect Transit eliminated the Olive route but deviated their fixed route Pink line to accommodate the requests of individuals who live in an apartment complex off Main in Normal. Several tenants in this apartment complex were directly impacted by the elimination of the Olive line but this was mitigated by the Pink line route deviation.

An increase in bus fare for fixed route and paratransit riders was also discussed at these board meetings. The board created a committee called “Connect to the Future Working Group” to evaluate the fare increase and postponed any rate change decisions until January 2020. Connect Transit reported that the board dynamics have individuals with disabilities or parents of children with a disability serving on this board.

Connect Mobility, the paratransit program still provides service to the service area of the eliminated Olive Route. The HRA was not provided documentation on the number of riders that use the paratransit service along the now defunct Olive route. During the site visit, Connect Transit Management staff reported approximately 800 paratransit rides along this route before the suggested bus route cut was implemented and Connect Mobility still serves this route.

The HRA reviewed Connect Transit’s Short-Range Transit Plan and noted that their funding comes from a variety of sources. The Plan states “65% of funding comes from Illinois Department of Transportation Downstate Public Transportation Act (30ILCS 740) or the Downstate Operating Assistance Program (DOAP). 15% comes

from Federal 5307 Funding (49 U.S.C.53, 5307).” Sales tax from the Bloomington-Normal area is 8%. Passenger fares contributes 6% to Connect Transit’s annual operating expenses and the final revenue comes from contract fares and advertising. The HRA reviewed a 2018 Illinois Statewide Public Transportation Plan Final Report developed by the Illinois Department of Transportation. This document states that the average adult fare for most downstate bus services are \$1.00. Connect Transit is listed in this February 2018 report as charging \$1.00 for adult bus fare one-way.

Federal Transportation regulation 49 C.F.R. 37.131 on service criteria for complementary paratransit c. fares state the following: “The fare for a trip charged to an ADA paratransit eligible user of the complementary paratransit service **shall not exceed twice the fare** that would be charged to an individual paying full fare (i.e., without regard to discounts) for a trip of similar length, at a similar time of day, on the entity's fixed route system. (1) In calculating the full fare that would be paid by an individual using the fixed route system, the entity may include transfer and premium charges applicable to a trip of similar length, at a similar time of day, on the fixed route system. (2) The fares for individuals accompanying ADA paratransit eligible individuals, who are provided service under § 37.123 (f) of this part, shall be the same as for the ADA paratransit eligible individuals they are accompanying....(4) The entity may charge a fare higher than otherwise permitted by this paragraph to a social service agency or other organization for agency trips (i.e., trips guaranteed to the organization)....(g) Additional service. Public entities may provide complementary paratransit service to ADA paratransit eligible individuals exceeding that provided for in this section. However, only the cost of service provided for in this section may be considered in a public entity's request for an undue financial burden waiver under §§ 37.151–37.155 of this part.”

Federal Transportation Regulations (49 C.F.R. § 37.5) on Nondiscrimination state: “(a) No entity shall discriminate against an individual with a disability in connection with the provision of transportation service. (d) An entity shall not impose special charges, not authorized by this part, on individuals with disabilities, including individuals who use wheelchairs, for providing services required by this part or otherwise necessary to accommodate the.”

Federal Transportation Regulations (49 C.F.R. § 37.123) on ADA paratransit eligibility require that: “(a) Public entities required by § 37.121 of this subpart to provide complementary paratransit service shall provide the service to the ADA paratransit eligible individuals described in paragraph (e) of this section. (b) If an individual meets the eligibility criteria of this section with respect to some trips but not others, the individual shall be ADA paratransit eligible only for those trips for which he or she meets the criteria. (c) Individuals may be ADA paratransit eligible on the basis of a permanent or temporary disability. (d) Public entities may provide complementary paratransit service to persons other than ADA paratransit eligible individuals. However, only the cost of service to ADA paratransit eligible individuals may be considered in a public entity's request for an undue financial burden waiver under §§ 37.151–37.155 of this part. (i) An individual is eligible under this paragraph with respect to travel on an otherwise accessible route on which the boarding or disembarking location which the individual would use is one at which boarding or disembarking from the vehicle is precluded as provided in § 37.167(g) of this part. (ii) An individual using a common wheelchair is eligible under this paragraph if the individual's wheelchair cannot be accommodated on

an existing vehicle (e.g., because the vehicle's lift does not meet the standards of part 38 of this title), even if that vehicle is accessible to other individuals with disabilities and their mobility wheelchairs....f) Individuals accompanying an ADA paratransit eligible individual shall be provided service as follows: (1) One other individual accompanying the ADA paratransit eligible individual shall be provided service—(i) If the ADA paratransit eligible individual is traveling with a personal care attendant, the entity shall provide service to one other individual in addition to the attendant who is accompanying the eligible individual; (ii) A family member or friend is regarded as a person accompanying the eligible individual, and not as a personal care attendant, unless the family member or friend registered is acting in the capacity of a personal care attendant; (2) Additional individuals accompanying the ADA paratransit eligible individual shall be provided service, provided that space is available for them on the paratransit vehicle carrying the ADA paratransit eligible individual and that transportation of the additional individuals will not result in a denial of service to ADA paratransit eligible individuals; (3) In order to be considered as “accompanying” the eligible individual for purposes of this paragraph (f), the other individual(s) shall have the same origin and destination as the eligible individual.”

CONCLUSION:

The HRA concludes the second complaint alleging improper use of the paratransit system, Connect Mobility, by dropping routes and forcing individual’s with disabilities to use this alternative transportation system is **UNSUBSTANTIATED**. The HRA does assess that when Connect Transit presented their cost saving plans to terminate a fixed route, the Olive route, it gave the appearance of cutting service to a transit dependent population, with several of those riders being individuals with a disability. The bus company was able to adjust their routes through a public process and, in this case, the bus company modified their original plan by providing a deviated route to an area of Normal for the “transit dependent” riders in this area of Normal.

Regarding the fare increases, the HRA reviewed the American with Disabilities Act regulations, federal regulations, and Illinois Department of Transportation regulations and saw that the bus company did not charge individuals with disabilities more than what is permitted by law, at this time. According to the Federal Transportation regulations (49 C.F.R. 37.131) on paratransit fares, if the nondisabled rider bus fares increase in the future, Connect Transit is not permitted to raise the paratransit rates for adult riders with a disability by more than twice what they charge a nondisabled rider.

The HRA echoes several key findings and recommendations that the Connect Transit Short-Range Transit Plan identifies and would **suggest** the following:

- The HRA would encourage Connect Transit to strongly focus on meeting the needs of their riders who are transit dependent and those with disabilities. Even if statistics show that it is less than five riders at a bus stop. Those less than five riders could be highly transit dependent and/or have a disability and their public transportation needs should be kept as a priority.

- The HRA would encourage Connect Transit to prioritize fare capping or other mechanisms to ensure that riders with the most need are not unduly burdened, especially those with a disability.
- Connect Transit should continue to work in partnership with all federal, state, local and private entities in the Bloomington-Normal area to meet the public transportation needs of their transit dependent riders.
- Correct the Connect Transit website fare section: <https://www.connect-transit.com/fares/fares.asp> as the Connect Mobility 30 Day Pass is listed at costing \$65.00 when it should be \$64.00 to keep within the regulations that allow charging for paratransit services to be no more than twice the cost standard fares.
- The HRA would also suggest that Connect Transit not double fees on their riders who use the paratransit service. Federal paratransit cost regulations state the expense bared by the rider with a disability “**shall not exceed twice the fare**” and does not say you must double the fare.

RESPONSE

Notice: The following page(s) contain the provider response. Due to technical requirements, provider responses appear verbatim in retyped format.
