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# Coordinated Public Transit-Human Services Transportation Plan



2013 Update

# Acknowledgements

The Coordinated Public Transit Human Services Transportation Plan was managed by the Regional Transportation Authority (RTA).

The RTA would like to thank the Project Advisory Committee for providing oversight, reviewing interim work products, and sharing data and information over the course of the project. The Project Advisory Committee is comprised of a diverse group of stakeholders representing the target populations, geography and transportation interests of the region.



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Appendix A: Inventory of Transportation Providers

# Introduction

The Coordinated Public Transit-Human Service Transportation Plan (HSTP) was first developed in 2007 by the Regional Transportation Authority (RTA) to meet the requirements of the New Freedom and Job Access Reverse Commute (JARC) programs. Upon the signing into law of the new surface transportation legislation, Moving Ahead for Progress in the 21<sup>st</sup> Century (MAP-21), on July 6, 2012, it became apparent that the HSTP should be updated to conform to the new legislation. Much of the original HSTP is still relevant, particularly with regard to its assessment of needs, and is incorporated as an Appendix to this update. It is important to note that the federal circular that would further clarify and detail the requirements of the MAP-21 Section 5310 program has yet to be finalized. Therefore, any inconsistencies that may be found between the plan and final requirements as published in a circular governing the program will be resolved in accordance with the final regulations.

## **History of the HSTP**

In 2007, The Regional Transportation Authority (RTA) led a collaborative planning effort to identify and recommend regional and local strategies that encourage the most effective use of available community transportation services to enhance mobility for the region's older adults, persons with disabilities and persons with low incomes. The planning effort was known as Connecting Communities through Coordination. The scope of the project includes the six-county RTA region, comprising Cook, DuPage, Kane, Lake, McHenry and Will counties, plus areas in CMAP's planning area; Kendall County, Sandwich Township (DeKalb County), Somonauk Township (DeKalb County), and Aux Sable Township (Grundy County) and was built upon existing coordination plans in the region or plans that were in the process of being developed. This planning process culminated in the adoption of the Coordinated Public Transit-Human Services Transportation Plan or HSTP in the RTA Board in October 2007. The HSTP, in meeting the requirements of Safe, Accountable, Flexible, Efficient Transportation Equity Act – A Legacy for Users (SAFETEA-LU), allowed the region to access federal funding associated with:

- FTA Section 5310 Transportation for Individuals who are Elderly and Individuals with Disabilities. This program provided capital funding for private, non-profit entities (and if none, public entities) that are involved in transporting older adults and persons with disabilities.
- FTA Section 5316 (JARC) This program provided funding for projects/services that improve access to transportation services to employment and related activities for welfare recipients and eligible low-income individuals and to transport residents of urbanized and non-urbanized areas to suburban employment opportunities.
- FTA Section 5317 New Freedom Program. This program provided funding for projects/services that provide new public transportation services and public transportation alternatives beyond those required by the Americans with Disabilities Act (ADA).

The primary objectives of the HSTP were to access federal funding for needed transportation services and become a resource for supporting and encouraging local coordination efforts. The region has accomplished many of those objectives during the past six years. Since the adoption of the HSTP, 33 projects were funded through the JARC and New Freedom Programs. Several of the projects operate as multi- jurisdictional services underscoring the coordination taking place in the region.

# MAP-21 Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities

MAP-21 consolidates two former programs, the Elderly and Disabled Program (formerly Section 5310) and the New Freedom Program (Section 5316), into the Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities. The MAP-21 Section 5310 Program, just as its forerunners were, is a formula grant program. It is designed to continue the goals and eligible activities of the previous programs including supporting capital projects that are planned, designed, and carried out to meet the special needs of seniors and individuals with disabilities when public transportation is insufficient, inappropriate, or unavailable. It may also be used for public transportation projects that exceed the requirements of ADA that improve access to fixed-route service and decrease reliance by individuals with disabilities on complementary paratransit, and for alternatives to public transportation that assist seniors and individuals with disabilities. Any projects to be funded with Section 5310 funding must be derived or included in a locally developed human services coordinated plan, such as the HSTP as updated. The legislation discontinued JARC as a stand-alone program, and instead allows eligible recipients of Section 5307 to utilize these funds to support JARC projects.

The legislation also affected designated recipient requirements. A designated recipient is the agency that assumes the responsibility for managing a Federal Transit Administration grant program like Section 5310. Prior to MAP-21 only a state's department of transportation could be the designated recipient for Section 5310. Consequently, the Illinois Department of Transportation (IDOT) was the sole designated recipient of Section 5310 for the entire state. MAP-21, however, allows the RTA and IDOT to be co-designated recipient for northeast Illinois.

The co-designation status has been approved by the Chicago Metropolitan Agency for Planning (CMAP), the Metropolitan Planning Organization (MPO) for northeast Illinois. Under this arrangement, IDOT will be responsible for project selection and the award of Section 5310 funded paratransit vehicles and RTA will be responsible for all other Section 5310 projects. This arrangement is further explained in Chapter 3. The projects RTA will be responsible for selecting and awarding will essentially consist of projects that are similar to those funded through the New Freedom Program that RTA administers for those grantees who have projects still receiving assistance with funds previously awarded under SAFETEA-LU.

## Approach to Updating the HSTP

As was the case during the development of the 2007 HSTP, the RTA again relied on the input of the HSTP Project Advisory Committee (PAC). The PAC is comprised of representatives from the RTA Service Boards; the Chicago Transit Authority (CTA), Metra, and Pace, the Illinois Department of Transportation (IDOT), the Chicago Metropolitan Agency for Planning (CMAP), the seven counties, human service agencies that reflect populations of seniors, individuals with disabilities, and low-income individuals, and private non-profit and private for profit agencies. PAC members were invited to participate in a total of five meetings between December 2012 and July 2013. A full list of the representative agencies on the PAC is provided below:

- TMA of Lake-Cook
- Metra
- Lake County
- Ray Graham Association
- Cook County Department of Transportation Highway
- Continental Air Transport
- Center for Neighborhood Technology (CNT)
- Chicago Transit Authority (CTA)
- Illinois DOT (IDOT)
- DuPage County
- Will County
- McHenry County
- Northeast Illinois Area Agency on Aging
- Kane County Association for Individual Development (AID)
- Chicago Metropolitan Agency for Planning (CMAP)
- Pace
- Mayor's Office for People with Disabilities (MOPD)
- Council for Jewish Elderly
- Chicago Urban League
- Kendall County
- Kane County
- Hanover Township
- City of Naperville

Based on a review of the original HSTP, the PAC agreed that much of the 2007 plan (accessible online at <a href="http://rtachicago.com/images/stories/Initiatives/JARCNF/HSTP.pdf">http://rtachicago.com/images/stories/Initiatives/JARCNF/HSTP.pdf</a>) was still pertinent and only a brief update to the key elements of the HSTP was required. The 2013 HSTP Update includes information from the original plan when pertinent to the subject under discussion and is organized in the following manner:

- Chapter 1: Overview of the Study Area and Transportation Services
- Chapter 2: Service Limitations, Gaps, Needs and Strategies

- Chapter 3: Local Program Policies
- Appendix A: Inventory of Transportation Providers

## **HSTP 2013 Update Public involvement and Adoption Process**

Upon endorsement from the PAC, the RTA will open a 30 day public comment period by posting the draft HSTP 2013 Update on the RTA website and solicit feedback from the following groups:

- CMAP Human & Community Development Committee
- RTA Regional Citizens Advisory Board
- RTA ADA Advisory Committee

At the conclusion of the Public Comment Period, RTA staff will incorporate any changes to the HSTP and communicate those changes to the PAC. The final HSTP will then be presented to the following groups (in order) for adoption:

- CMAP Transportation Committee
- CMAP MPO Policy Committee
- RTA Board of Directors

# Chapter 1: Overview of Study Area

# **Overview of Study Area**

The scope of the project includes the six-county RTA region, comprising Cook, DuPage, Kane, Lake, McHenry and Will counties, plus areas in CMAP's planning area; Kendall County, Sandwich Township (DeKalb County), Somonauk Township (DeKalb County), and Aux Sable Township (Grundy County). There are currently more than 8.4 million people living in the seven-county study area. Approximately 9% are persons with disabilities, 11% are aged 65 and over and 13% are individuals with low income. Cook County with 62% of the region's population also has the highest proportion of each of the target populations residing in the county. This information is shown for each county and for the study area in Tables 1-1 and 1-2.

Table 1-1 2010 Target Populations by County

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Region	Total Population	Persons with Disabilities	Aged 65 and Over	Low Income
Cook	5,194,675	515,926	620,329	820,759
DuPage	916,924	70,159	106,398	56,849
Kane	515,269	37,802	49,690	52,042
Kendall	114,736	7,032	8,382	4,360
Lake	703,462	50,566	73,093	57,684
McHenry	308,760	24,174	31,320	21,304
Will	677,560	51,097	62,814	48,107
Total	8,431,386	756,756	952,026	1,062,355

Table 1-2 2010 Proportion of Target Populations by County

Region	2010 Percentage of regional population	Persons with Disabilities	Aged 65 and Over	Low Incomes
Cook	61.6%	9.9%	11.9%	15.8%
DuPage	10.9%	7.7%	11.6%	6.2%
Kane	6.1%	7.3%	9.6%	10.1%
Kendall	1.4%	6.1%	7.3%	3.8%
Lake	8.3%	7.2%	10.4%	8.2%
McHenry	3.7%	7.8%	10.1%	6.9%
Will	8.0%	7.5%	9.3%	7.1%
Total	100.0%	9.0%	11.3%	12.6%

#### Source:

Census Bureau's American Community Survey 2009-2011

CMAP: New U.S. Census Data Analysis – Overview of Trends in the Senior Population

### **Assessment of Available Services**

The seven-county study area contains a multitude of transportation services, ranging from large regional transit operators to small local providers. A summary table listing all community transportation services in the seven-county region is provided in Appendix A.

## Regional Transportation Authority (RTA)

The RTA provides financial oversight and regional planning—including coordination—for regional public transportation operators ("service boards") in Northeastern Illinois: Chicago Transit Authority (CTA), Metra, and Pace. As the transportation funding body for the region, the RTA has also been involved in overseeing the ADA paratransit services in the region.

## Overview of the CTA<sup>1</sup>

The Chicago Transit Authority (CTA) is the operator of buses as well as subways and elevated rapid transit primarily within the City of Chicago and forty surrounding suburbs. On an average weekday, nearly 1.6 million rides are taken on CTA, providing 83% of the public transit trips in the six-county region. The CTA operates 1,200 rail cars over eight routes and 224.1 miles of track, and has approximately 1,781 buses that operate over 129 routes and 1,959 route miles. All 129 bus routes are fully accessible to customers with disabilities. Lifts and ramps on all buses are available for use upon request by anyone who has trouble with steps, even temporarily. The catchment of people living or working within ¾ of a mile of a bus stop is approximately 3.5 million.

From 1981 through June 2006, the CTA also operated paratransit services, including Special Services, a shared-ride, door-to-door service, and the Taxi Access Program (TAP), a taxi subsidy program available to Special Services customers. Beginning in 1992, Special Services served as the CTA's response to its ADA complementary paratransit obligation. For most of these years, Special Services was provided through turn-key contracts with three private carriers (Cook-DuPage Transportation, SCR Transportation, and Art's Transportation). Per House Bill 1663, passed in July 2005, Pace took over the responsibility for Special Services and TAP, and hence assumed these Special Services contracts on July 1, 2006.

# Overview of Metra<sup>2</sup>

Metra is the largest commuter rail system in the nation geographically; serving a six-county region of more than 3,700 square miles Metra operates 11 fully accessible rail lines with more than 700 trains that serve over 241 stations throughout the six-county area of Northeast Illinois. Since Metra assumed railroad operations for Northeastern Illinois in 1985, ridership grew by 35.6 percent, for an average annual growth rate of 1.3 percent. Metra provides over 81.7 million rides annually.

<sup>&</sup>lt;sup>1</sup> Source information used for this Overview section included: CTA website <u>www.transitchicago.com</u>.

<sup>&</sup>lt;sup>2</sup> Source: Metra website www.Metrarail.com

# Overview of Pace<sup>3</sup>

Pace is the premier suburban transit provider, safely and efficiently moving people to and from work, school and other regional destinations. Pace serves tens of thousands of daily riders with fixed route bus service, ADA paratransit service, vanpools, Community Transit Services, and carpool and vanpool coordination through the Pace RideShare Program. Pace service is available to the 5.2 million residents of Cook, DuPage, Kane, Lake, McHenry and Will counties, an area of over 3,500 miles encompassing a wide range of demographic profiles and environments from urban to exurban.

Approximately 200 accessible fixed routes operate in 186 communities and provide a daily average of 135,492 trips. Fixed route services include regular bus routes and Pace's Express Service Network (ESN). Pace's ESN services are long distance, express trips designed to improve connectivity throughout northeastern Illinois and provide access to jobs, schools, medical care that may not be available in a rider's local area. ESN also includes Pace's Express Service to Popular Destinations (ESPD) which provides bus service to many events and activities in the suburbs and Chicago.

Pace's ADA Paratransit Service provides prearranged origin-to-destination service for persons with disabilities whose eligibility has been determined by the regional certification process managed by the Regional Transportation Authority (RTA). This service is operated with over 1,100 vehicles and provides almost 4 million trips annually. Service rules are governed by the federal Americans with Disabilities Act.

The Vanpool Incentive Program provides Pace vans for work-related trips. Vehicles with lifts or ramps are available for participants with mobility devices. Variations of the program include Traditional Vanpools, Metra Feeder Vanpools and Advantage Vanpools. Carpool and vanpool partners can be found by registering at PaceRideShare.com. Pace RideShare is an automated, free matching service to assist with forming new, or joining existing, carpools and vanpools. Pace operates over 750 vanpools and provides over 2,000,000 trips annually.

Pace's Community Transit Services, like Commuter Links, Local Circulators, Dial-a-Rides (not ADA), Call-n-Rides, and Employee Shuttles, are local transportation services that use smaller capacity vehicles to provide short trips within communities. Mobility Direct and the Taxi Access Program provide ADA paratransit-eligible riders with taxi-based alternatives to Pace ADA Paratransit Service in the city of Chicago. During peak periods, Pace's Dial-a-Ride program includes over 80 services operated in conjunction with counties, townships, municipalities, businesses, agencies and individuals, providing approximately 1,500,000 trips annually.

## Area Agencies on Aging

Transportation for seniors is funded in part with Federal Title IIIB funding which, in Illinois, is distributed by the Illinois Department of Aging to 13 Area Agencies on Aging (AAA) around the state. Each AAA is responsible for delivery of services to seniors in its area, including

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<sup>&</sup>lt;sup>3</sup> Source: Pace

transportation. Each AAA develops an Area Plan which details these services, noting that each Area Plan must be approved by the Illinois Department of Aging. Each AAA makes the decisions about what to fund and how to deliver the services. Federal Title IIIB funding requires a local match. In Illinois, this local match is provided partially by the state at about 5%, which is used for both administration match (at 65%) and service match (at 35%). The greater portion of the local match that is required to deliver services is generated by local communities. By statute, rider donations cannot be used as part of the local match; instead, they are to be used for service expansion. In the seven-county region, there are three AAAs:

- Chicago Department of Aging (City of Chicago) CDOA has four transportation programs listed on its website, but only one, Emergency Medical Transportation Services, is funded with Title IIIB funds.
- Suburban AAA (suburban Cook County) The Suburban AAA provides Title IIIB funds to ten transportation programs in 2006. Organizations receiving transportation funding include local units of government, senior centers, and human service agencies.
- Northeastern Illinois AAA (DuPage, Lake, Kane, Kendall, McHenry and Will Counties) --NIAAA funds senior transportation through human service agencies, Case Coordination Units and local units of government.

## **Township and Municipal Sponsored Services**

There are slightly more than 100 township and municipal sponsored community transportation services in the study area. These services include a combination of community bus service, dialaride services, and taxi subsidy programs. Most services are limited to township or municipal boundaries, with exceptions allowed to regional medical facilities. There are, however, several sub-regional services where groups of townships are collaborating to provide dialaride services for larger service areas. Some services are available to members of the general public with others available to targeted segments of the population, typically persons with disabilities and older adults.

In many cases, dial-a-ride services are provided jointly by local governments and Pace and administered as part of Pace's existing contracts with service providers. The level of Pace subsidy to townships and municipalities varies by region. A general overview of the number of township and municipal sponsored community transportation services available by county and by type are listed in Appendix A.

### **Local Human Service Transportation Programs**

There is also a network of approximately 80 human service transportation programs in the study area, including organizations that fund or operate transportation services for clients and specific segments of the population. The majority of these services provide transportation to and from medical facilities and specific programs and services, including employment and jobrelated activities. A listing of human service organization community transportation services is also provided as part of Appendix A.

## **On-going Coordination Activities**

Since the inception of the JARC/New Freedom program, 33 projects have been awarded totaling \$76 million (\$45 million of Federal funds). Additional information on all projects is available at <a href="https://www.rtams.org">www.rtams.org</a>. Included in the program are door-to-door services, fixed route services, reverse commuter rail service, volunteer driver transportation service and small car loan program. Regional successes that have been achieved with some level of consistency across the study area include:

- Pace Regional Call Center The Regional Call Center takes reservations from eligible low-income individuals, senior citizens, and persons with disabilities for demand response services, assign the appropriate Sponsor subsidy (funding source), assign the vehicle type, and assign trips to the appropriate service provider and monitors service delivery. Consumers have access to various transportation programs for which they are eligible from one central location.
- Metra Sunrise Express The Sunrise Express is an early morning reverse commute train which operates on the Metra UP North Line from Chicago to Waukegan. This service enables reverse commuters to meet 7AM work start times of north suburban employers. Other benefits include a viable suburb-to-suburb option for commuters living north of Chicago and an additional inbound train. Metra implemented the project April 2, 2007 with JARC funding that was exhausted in October 2011. In its last year of funding the project averaged 8,121 trips per month. Metra continues to provide the service with its own funds.
- Safer Foundation Ways to Work This JARC project provided reverse commute employment transportation for low-income persons who have criminal records and are residing in Cook County. The daily service was operated by a private contractor that covered three employment shifts transporting individuals to and from five designated pick-up points in the City of Chicago to employers located in the suburbs. In its last year of funding this project averaged 153 trips per month. The Safer Foundation is continuing the service with its own resources.
- Hanover Township Volunteer Express Volunteer driver New Freedom project supplementing the services offered by Hanover Township's Dial-A-Bus program.
   Volunteer drivers utilize their own vehicles to provide door-to-door service to the elderly and disabled requesting service outside of the township radius. The service averages approximately 49 trips per month by 3 volunteers.
- Ride in Kane The AID, Ride in Kane project coordinates and provides paratransit services in Kane County by optimizing transportation resources for older adults, person with disabilities and low-income individuals. The service transports them to jobs and

employment supportive activities. The project partners include private, non-profit organizations and local units of government. Currently, these partners are the Association for Individual Development, Aurora Township, Batavia Township, City of Batavia, Blackberry Township, Campton Township, City of Geneva, City of Elgin, Dundee Township, Dundee Park District, Village of Gilberts, Village of Campton Hills, Two Rivers Head Start, Hesed House/PADS of Aurora, Kane County, Kaneville Township, INC Board of Aurora, Senior Service Association, City of St. Charles, St. Charles Township and the Village of South Elgin. The 12,200 monthly trips provided by this service originate or terminate within Kane County. Service may be provided up to 7 days per week, 24 hours per day.

- DuPage County Transportation To Work Ride DuPage to Work is a service of the Ride DuPage system designed to enable persons with disabilities greater opportunities to obtain and maintain employment through more affordable transportation.
- Kendall Community Transit Program The vehicles and operations funded by this
  program will be used for demand responsive paratransit service to provide door-to-door
  service for populations of the disabled, low income, and senior populations in the urban
  portions of Kendall County. The project is designed to be the first phase of a countywide
  general public transportation system.
- Lake County Northwest Demonstration Project This JARC and New Freedom project provides weekday dial-a-ride service in Antioch, Avon, Grant, Lake Villa, Fremont, and Wauconda townships. A portion of the service is a flexible route connecting three Metra stations on the NCS Line and Milwaukee District North Line with residential areas to offer greater access to employment opportunities primarily for individuals with limited mobility and other transit dependent populations. The project is an outgrowth of the Lake County Inter/Intra County Paratransit Transportation Study funded through the Community Planning program. Current ridership is averaging 1,300 each month.
- McHenry County Service Integration and Coordination The project integrated four separate dial-a-ride services into one service allowing for standardization of service hours, fares, and call ahead requirements. This made the service more reliable for work trips and easier for persons with disabilities. The project location and Origin or Destination locations for service encompasses the townships of Dorr, Greenwood, and McHenry including the Cities of Crystal Lake, Woodstock and McHenry. The service provides 7,800 trips per month.
- Salvation Army Ways to Work The JARC WTW program provides small, short-term, low-interest loans to low-income families for the purpose of purchasing or repairing a car to get to work, childcare, and to pursue educational or job training opportunities.

 Will County Mobility Management Program - This JARC and New Freedom project provides transportation and mobility management services for persons with disabilities, the elderly and low-income individuals residing in eastern Will County townships. The program is an outgrowth of the county's coordinated paratransit plan funded through the RTA's Community Planning program.



# Chapter 2: Service Limitations, Gaps, Needs and Strategies

Service limitations, gaps and unmet needs were assessed in each of the seven counties that comprise the study area. As noted in the previous chapter, the region has many successful services that have made great strides in overcoming or mitigating many of the limitations noted here. However, service gaps and unmet needs persist despite on-going efforts to improve the quality of community transportation services through innovative use of resources and equipment.

### **Centralized Information**

Three counties currently offer a central resource listing available transportation services but in both cases transportation directories list services available within the sponsoring county only. The lack of centralized information outside of these areas means there is no single source for individuals seeking to find transportation options, eligibility requirements, fares and service hours, nor is there a region wide directory providing information on available community transportation services. Ideally, resource directories should be developed for each county individually as well as compiled into a regional directory. Resource guides should be updated annually and available in hard copy at several locations, on-line, in multiple formats and languages and potentially incorporate interactive trip making/scheduling options.

## **Spatial Limitations**

Spatial limitations in community transportation were observed in every county in the study area. However, as noted in the previous chapter, several services have been implemented during the past 5-8 years that have addressed some of these limitations on the county level. In most cases the limitations resulted in similar types of service gaps:

- Township and municipal sponsored dial-a-ride services are typically limited to the sponsoring jurisdictions' boundaries, with some exceptions allowed, typically for medical facilities. Limiting travel to township or municipal borders, even in cases where services are provided by groups of townships and municipalities, makes it difficult for some travelers to access educational, medical, service, shopping and employment centers outside of their dial-a-ride service area.
- Community transportation services are especially limited in rural areas. Recognizing that serving rural areas with population densities often results in low productivity and high per trip costs, there are unmet needs for individuals living in these areas seeking travel to/from local and regional service areas.

 Many areas provide subsidized taxi programs, which do provide opportunities for persons with disabilities, older adults and sometimes individuals with low incomes to cross township and municipal borders. Such services, however, are most appropriate for occasional travel. High per trip costs to the traveler, even with the subsidy, mean taxi services typically cannot support daily employment trips.

## **Temporal Limitations**

Service hours on most public dial-a-ride services are limited to weekdays during normal business hours, typically between 9 a.m. and 5 p.m. Again, many of these temporal limitations have been addressed by expanding hours on services that operate at the county level. Across the study area, temporal limitations create service gaps for travelers:

- A lack of weekend service Dial-a-ride services are generally not available, or are much more limited, on weekends. While some ADA paratransit services and human service transportation is provided, these services are typically not available to all members of the target populations.
- Service hours are not typically structured to effectively support employment. Many employment opportunities, particularly for persons with low incomes, require that transportation be available before 9 a.m., after 6 p.m., and on weekends.
- Service hours that start at 9 a.m. and end at 5 p.m. also make it difficult for individuals
  who are seeking local connections to regional transportation infrastructure such as Pace
  and Metra in order to access regional services, find employment or attend job training
  services in neighboring counties or in downtown Chicago.

# **Program Eligibility and Trip Purpose Limitations**

Program eligibility and trip purpose limitations also result in gaps and unmet needs in existing services. For example:

- Many of the existing dial-a-ride services are available to subsets of the three target populations. As a result, some populations, especially individuals with low incomes, have limited access to the transportation resources.
- ADA paratransit services are only available to ADA certified customers. Human service transportation programs are likewise available to program clients only.
- Several transportation programs are limited to taking people to/from medical
  appointments. Recognizing that medical trips are essential, an unmet need voiced
  across the study area is a lack of opportunities for people to make quality of life trips to
  go shopping, conduct personal errands or visit friends and families.

#### **Service Redundancies**

Service redundancies were identified in nearly every county in the study area. In most cases, service redundancies were identified as examples of multiple services available for one or more population sub-groups and at specific times of day, locations and trip types. Redundant services are most likely to occur under the following circumstances:

- Transportation services are oriented towards specific programs or services. For example, in areas where public parks and recreation agencies have vehicles to shuttle program participants from their homes to the program site, such transportation services were frequently redundant with township and/or municipality sponsored dial-a-ride services. Similar cases were also identified among human service agency transportation programs. While the motivation for offering reliable transportation is to meet specific program needs, such services nevertheless frequently overlap with other transportation programs.
- Municipal and village sponsored transportation services are frequently provided in locations where township or regional dial-a-ride services already exist. In many cases, redundant municipal services resulted from the geographic conundrum created by a situation where a single municipality, located within parts of four townships, each of which may offer service only within their individual township boundaries, may mean an individual cannot easily travel within municipal borders. Such fragmented service delivery, however, creates a situation requiring multiple, often redundant services.
- In many cases, local community transportation services, including human service transportation programs and publicly sponsored dial-a-ride services overlap with ADA services. Such overlaps typically occur for certain individuals, along specific routes and during specific times of the day.

## **Service Quality and Miscellaneous Issues**

Unmet needs and gaps in services were also identified in association with service quality, issues of affordability and other miscellaneous issues. These gaps and unmet needs include:

- Demand for many community transportation services exceeds the supply and capacity
  of local providers making it difficult for users to schedule trips. Many operators struggle
  to balance demand for same-day requests and subscription trips with the need to
  provide service to a wider population.
- Same-day service requests typically cannot be accommodated, except through taxi subsidy programs.
- Limited ability to book subscription service. The ADA paratransit services and many of the dial-a-ride services limit subscription trips. Without the ability to book on-going

regular trips, riders cannot be ensured regular rides. This limits their usefulness of the service for work or school trips that have set schedules.

- Concerns over the quality of service were voiced across the study area. In most cases, people reported concerns with taxis showing up on time (or showing up at all), as well as with driver training and familiarity with the program clientele and program operations.
- Concerns over affordability for some ADA customers and others who may use these services regularly, if not daily.

# **Sustainability**

A major issue raised by service providers is sustainability. Organizations involved in some of the successful on-going coordination efforts expressed a concern that without a sustainable, long-term funding source to support their services, the services are in jeopardy.

## **Strategies**

In consultation with the PAC, the strategies highlighted in the original HSTP were reorganized under these main topics. The use of these strategies is expected to address the service gaps, limitations, and needs moving forward.

- Improving Service Integration
  - Contracting with Agency Operators
  - Contracting with Common Service Providers
  - Short Term Loans
- Improving Accessibility
  - Accessibility Improvements at Non-Key Rail Stations
  - o Improving Access to Fixed-Route Bus Routes
- Tools that Improve Productivity
  - Tools that Improve Data Integrity, Fare Collection, Cost Sharing/Allocation, Billing/ Reporting, and Transfers
  - Consolidating Functions
  - Centralized Information
  - Tools that Support Live Dispatch
  - Sharing Resources
- Flexible Transit Services
  - o Agency/Employment "Tripper" Services
  - o Community Bus Routes
  - o Taxi Subsidy Programs

- o Volunteer Driver/Escort Programs
- o Reverse Commute



# Chapter 3: Local Program Policies

## **Federal Requirements**

As noted in the Introduction, MAP-21 consolidates two former programs, the Elderly and Disabled Program (formerly Section 5310) and the New Freedom Program (Section 5316), into the Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities. The MAP-21 Section 5310 Program, just as its forerunners were, is a formula grant program that is authorized for two years from October 1, 2012 through September 30, 2014. It is designed to continue the goals and eligible activities of the previous programs including supporting capital projects that are planned, designed, and carried out to meet the special needs of seniors and individuals with disabilities when public transportation is insufficient, inappropriate, or unavailable. It may also be used for public transportation projects that exceed the requirements of ADA that improve access to fixed-route service and decrease reliance by individuals with disabilities on complementary paratransit, and for alternatives to public transportation that assist seniors and individuals with disabilities. Any projects to be funded with Section 5310 funding must be derived or included in a locally developed human services coordinated plan, such as the HSTP as updated.

The legislation also affected designated recipient requirements. A designated recipient is the agency that assumes the responsibility for managing a Federal Transit Administration grant program like Section 5310. Prior to MAP-21 only a state's department of transportation could be the designated recipient for Section 5310. Consequently, the Illinois Department of Transportation (IDOT) was the sole designated recipient of Section 5310 for the entire state. MAP-21, however, allows the RTA and IDOT to be co-designated recipient for northeast Illinois. The co-designation status has been approved by the Chicago Metropolitan Agency for Planning (CMAP), the Metropolitan Planning Organization (MPO) for northeast Illinois. Under this arrangement, IDOT will be responsible for project selection and the award of Section 5310 funded paratransit vehicles and RTA will be responsible for all other Section 5310 projects. The projects RTA will be responsible for selecting and awarding will essentially consist of projects that are similar to those funded through the New Freedom Program that RTA administers for those grantees who have projects still receiving assistance with funds previously awarded under SAFETEA-LU.

One unique aspect of the legislation is how it defines capital projects and how much funding must ultimately be allocated to particular types of capital projects. MAP-21 Section 5310 expands the definition of capital to incorporate operating contracts, provided the grantee is a private non-profit agency or a government agency that is designated by the governor as a coordinating agency. In addition, it further requires that at least 55% of the funds awarded in the region must be for capital projects that are awarded to private non-profit agencies or a government agency that is designated by the governor as a coordinating agency. While capital projects may be awarded to a government agency that is not designated as a coordinating agency, that funding may not be counted toward meeting the 55% threshold amount. The

impact of these requirements on local program policies is discussed in the following section of the report.

## **Local Program Policies**

A major focus of discussion amongst the PAC was the approach to utilizing MAP-21 Section 5310 funding. Based on current estimates, it is anticipated that the Northeastern Illinois region will receive approximately \$12 million during federal fiscal years 2013 and 2014. The PAC agreed to combine all MAP-21 funds into a multi-year approach. Table 3-1 illustrates that approach:

Table 3-1 MAP-21 Section 5310 Multi-Year Approach

Allocation	5310 Funding	Notes
IDOT PT Vehicles	\$3,600,000*	To IDOT for the competitive selection and funding of paratransit vehicles for agency use by private non-profit providers or by government agencies designated as a coordinating agency by the
		governor. IDOT will conduct a separate Call for Projects for
		vehicles. The RTA Call for Projects will not accept applications for
		vehicles.
RTA Admin Funds	\$400,000	For RTA programmatic administration purposes.
Existing Projects	TBD	Amount TBD based on existing grantee interest, projections of
		how long existing funding will last, and with the goal of
		supporting existing projects until 9/30/16.
Other Projects	TBD	Amount TBD based on allocation to Existing Projects and future
		competitive selection process.
TOTAL	\$12,000,000	

<sup>\* -</sup> Consideration may be given to allocating additional funds beyond the \$3.6m to the purchase of paratransit vehicles. This possibility would exist if all other project funding needs beyond paratransit vehicles are met or there are insufficient recommended project awards in addition to paratransit vehicles that can count toward meeting the 55% minimum threshold requirement.

#### Notes:

At least 55% of awards (\$6.6 million) must be used for projects that meet the MAP-21 definition of "capital".
 Under the current scenario, the \$3.6 million allocation to IDOT would count toward this floor, requiring that an additional \$3 million in Existing or Other Projects to be used for capital.

As noted in Table 3-1, \$3.6 million is planned to be allocated to IDOT over the current two-year life of the program for the paratransit vehicle portion of the program. This \$3.6 million allocation for the purchase of paratransit vehicles will be counted toward meeting the 55% threshold. This means that out of the remaining balance of \$8.4 million, an additional \$3 million must be for projects that that may be counted toward meeting the 55% threshold requirement. As mentioned earlier, operating projects may be counted as capital, if the grantee for the operating project is a private non-profit agency and contracts for service. Projects administered by government agencies that serve as grantees and contract for operating service are only eligible if designated by the governor as a coordinating agency. In our region, no government agency has been so designated as yet.

Given this situation, the PAC agreed to require all operating projects, even those that may technically qualify under the law as a capital project to require a 50% local match that is

standard for an operating project. To do otherwise would mean that some projects, although identical in all respects except for the status of the grantee, would have different matching requirements. Thus in some instances, a government agency would be required to provide a 50% match, while a private-non-profit agency would be required to provide 20% match. To eliminate this difference, those projects that are classified as capital, even though they are operating projects in the traditional sense, would be required to provide the equivalent of a 50% of the operating budget. Subsequently, all approved operating projects, whether technically classified as capital or operating, would be reimbursed for 50% of its operating expenses. The end result is that all funded operating projects will receive reimbursement for 50% of approved operating expenses.

## **Section 5310 Program Selection Team**

An important topic of discussion at several PAC meetings was the makeup of the project selection team for the RTA administered portion of the program. Under SAFETEA-LU, the project selection team was made up of two members from both RTA and CMAP, and one representative from IDOT. The project selection team was tasked with evaluating applications and developing a program of projects. Applications from RTA, CMAP, or IDOT were not allowed. The PAC ultimately agreed to continue the same makeup for the MAP-21 Section 5310 Program. However, the RTA indicated the desire to submit applications for 5310 funding. Therefore, the RTA will recuse itself from scoring its own application(s) to ensure a fair and transparent project selection process. Separately, IDOT will evaluate paratransit vehicle grant applications in fulfillment of their role as designated recipient for that portion of the program.

## **Section 5310 Program Selection Criteria**

The selection criteria for both RTA and IDOT administered projects may be subject to revisions but such revisions are not expected to be substantive and will be discussed with the PAC prior to adjustment.

## RTA Administered Section 5310 Projects

The following set of program selection criteria was developed based on the federal requirements, the strategies described in Chapter 2, and in accordance with input from the PAC. The specific criteria will evaluate the applications in accordance to:

- Project Eligibility (Eligible/Not Eligible)
  - ➤ Proposed project addresses: (a) public transportation projects planned, designed, and carried out to meet the special needs of seniors and individuals with disabilities when public transportation is insufficient, inappropriate, or unavailable; (b) public transportation projects that exceed the requirements of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.); (c) public transportation projects that improve access to fixed route service and decrease reliance by individuals with disabilities on complementary paratransit; and (d)

- alternatives to public transportation that assist seniors and individuals with disabilities with transportation.
- Project application identifies and addresses an unmet need identified in the Human Services Transportation Plan (HSTP). This should include: (1) a description of the project; (2) identification of the unmet needs (which is/are addressed by the project); (3) how the project will address the unmet need(s), e.g., in terms of serving new riders, a new area, a new day and/or times, a higher frequency, less advance notice, more driver assistance, etc.; and (4) an estimated quantification of benefits. Any additional obligations, e.g., the provision of ADA complementary paratransit as a result of implementing a new fixed bus route in a previously unserved area, should be noted.
- Local match will be supplied.
- Consistency with the HSTP and its Strategies (Points Awarded)
  - ➤ (20 PTS) Project employs one or more strategies that:
    - Improves Service Integration
    - o Improves Accessibility
    - o Improves Productivity
    - Provides Flexible Transit Services
  - ➤ (10 PTS) Project markets to the target population and promotes public awareness
- Coordination (Points Awarded)
  - ➤ (25 PTS) Project Utilizes or Coordinates with existing public transportation providers and private human service agencies; or reflects partnerships with non-transit entities and/or private non-profit/for-profit organizations.
  - > (20 PTS) Project address strategies and recommendations reflected in the CMAP GOTO2040 Plan and RTA Strategic Plan.
- Sustainability (Points Awarded)
  - ➤ (15 PTS) Significant support is demonstrated for the project (in terms of letters of support).
  - ➤ (10 PTS) The submitting agency/organization has an approach for obtaining support (financial or otherwise) for the project over the long term.

## **IDOT Administered Section 5310 Projects**

The selection criteria for Paratransit Vehicle applications received by IDOT will include:

Criteria 1: Level of Existing Services (Maximum 3.0)

- Inexperienced (new agency, new to transportation services or fleet administration) 0.0 –
   1.0 Points
- Experienced (transportation services offered, new to 5310 program) 1.0 2.0 Points

- Established (current grantee, history of transportation services within the program) 2.0
   3.0 Points
- Only available provider for specialized/private services, very active coordination partner 3.0 Points

## Criteria 2: Application (Maximum 3.0)

- Incomplete (missing information, difficult to understand, ineligible request) 0.0 1.0
   Points
- Effective (new or primary transport services for elderly or disabled riders) 1.0 2.0
   Points
- Established (current grantee, history of transportation services within the program) 2.0
   3.0 Points

## Criteria 3: Equipment Utilization (Maximum 3.0)

- Low (less than 5,000 miles per year) INELIGIBLE
- Poor (5,000 8,000 per year) 0.0 1.0 Points
- Fair (8,000 15,000 per year) 1.0 2.0 Points
- Excellent (15,000 or more per year) 2.0 3.0 Point

## Criteria 4: Administration/Fleet Control (Maximum 3.0)

- Poor (incomplete records, lack of detailed recordkeeping) 0.0 1.0 Points
- Limited (planning documents complete, lacking long-term vision) 1.0 2.0 Points
- Excellent (long-term strategic planning, expansion of services planned) 2.0 3.0 Points
- Comments: no current maintenance plan, no manual for all vehicles

## Criteria 5: Vehicle Maintenance/Driver Training (Maximum 4.0)

(Note: Examples of maintenance and training policies should be included with submission)

- Poor (no maintenance plans, no training policy, no records) 0.0 1.0 Points
- Fair (incomplete maintenance plan and training records) 1.0 2.0 Points
- Satisfactory (following suggested maintenance plan, offers required training) 2.0 3.0
   Points
- Excellent (comprehensive maintenance plan and records, periodic refresher training required) 3.0 4.0 Points

### Criteria 6: Coordination Efforts (Maximum 4.0)

- Inactive (not currently participating in meetings, planning, or service provision) INELIGIBLE
- Participant (an agency that regularly attends planning meetings only) 0.0 2.0 Points
- Active Participant (an agency that routinely meets committee requests with data, information, and resources in the development of strategy planning) 2.0 3.0 Points
- Leadership Participant (an agency that routinely volunteers leadership, data, and resources to coordination planning and service provision) 3.0 4.0 Points

 Comments: Letters of support attached, but no indication of the level of coordination involvement

## **Section 5310 Program Selection Process**

Upon agreement of the multi-year approach, 5310 program selection team, and 5310 program selection criteria, the PAC developed and agreed upon the following steps for the Section 5310 Program Process:

- 1) The RTA will develop a Section 5310 program application in accordance with the selection criteria and process approved as part of the HSTP.
- 2) The RTA will submit the required Program Management Plan (PMP) to the FTA.
- 3) IDOT will solicit and evaluate applications for paratransit vehicles as part of its Consolidated Vehicle Procurement program.
- 4) The RTA will reach out directly to existing project grantees, and if they are interested they will submit a Section 5310 application. These applications will not be evaluated using selection criteria. The application is required to get a better understanding of needed funding, how long it will last, and how much of the requested funding may be applied to capital.
- 5) The RTA will review the applications, determine aspects of the project that can be considered capital, and prepare a recommended allocation for existing projects for discussion with the 5310 Project Selection Team. The recommendation will also identify a mark that can be used for the competitive call for other projects along with an updated target of where we stand on the 55% capital floor.
- 6) The RTA and the 5310 Project Selection Team will come to an agreement on the allocation to existing projects, share and discuss the results with the PAC, and finalize the available funding mark for the competitive call for projects.
- 7) The RTA will launch a 5310 program website explaining all aspects of the program based off of the adopted HSTP including goals, eligible projects and activities, eligible applicants, timeline, and available funding for the competitive call for projects.
- 8) The RTA will issue a competitive call for new projects and conduct the necessary outreach.
- 9) Applications received will be evaluated by the 5310 Project Selection Team and scored using the agreed upon selection criteria from the HSTP and the results shared and discussed with the PAC.
- 10) A proposed Program of Projects (POP) will be released for public comment. Various CMAP, RTA, and other committees may receive informational presentations in order to solicit feedback.
- 11) The proposed POP will be presented to the RTA Board for adoption.
- 12) The RTA will submit the POP to CMAP for inclusion in the TIP.
- 13) The RTA will work with successful applicants to execute appropriate agreements.
- 14) Once all agreements are executed, the RTA will submit the 5310 grant application to the FTA.
- 15) Once the RTA grant application is approved by the FTA, sub-recipients may initiate their projects.

- 16) The RTA will conduct compliance oversight activities in accordance with the 5310 Program Management Plan.
- 17) The RTA will re-convene the PAC and 5310 Project Selection Team if and when additional funding is made available through either an extension of MAP-21 or new legislation.
- 18) The HSTP may be amended to incorporate projects awarded Section 5310 funding by either RTA or IDOT in northeast Illinois if subsequently required by federal regulations.



COOK COUNTY	DUPAGE COUNTY	KANE COUNTY	LAKE COUNTY	McHENRY COUNTY	WILL COUNTY	REGIONAL/MULT	I- COUNTY SERVICE
						Human Service Transportation	
Pace Support Dial-a-Ride	Pace Support Dial-a-Ride	Pace Support Dial-a-Ride	Pace Support Dial-a-Ride	Pace Support Dial-a-Ride	Pace Support Dial-a-Ride	Programs	Counties Served
Barrington	Village of Bensenville	Ride In Kane	Barrington	Southeast McHenry County DAR	Central Will Dial-a-Ride	- Vogatanio	
Bloom Township	Bloomingdale Township	Aurora Township	Benton Township, Zion Township	Midday Intercommunity	DuPage Township Dial-a-Ride	Advocate Good Shepherd Hospital	Most of Lake, SE McHenry, Cook (Barrington)
City of Chicago Mobility Direct Chicago Taxicabs	Downers Grove Township	City of Batavia	Ela Township	City of Harvard DAR	Frankfort Township Dial-a-Ride	American Cancer Society- Fox Valley	Kane, Kendall, and McHenry; also LaSalle and DeKa
City of Chicago Access Program Chicago Taxicabs	Wayne Township	Batavia Township	Fox Lake, Grant Township	Marengo/Riley Township DAR	Southwest Will Dial-a-Ride	Ride in Kane	Suburban Cook, DuPage Kane, Kendall
Lemont Township	DuPage County Ride DuPage	Dundee Township	Fremont Township	<u>MCRide</u>		Council of Jewish Elderly	Cook and Lake
Leyden Township	DuPage County - Health Dept.	City of St. Charles	Central Lake County (Libertyville, Libertyville Township, Mundelein)	City of Crystal Lake DAR	Other Dial-a-Ride Services	Countryside Association for People with Disabilities	Northern Cook and Lake
Lyons Township	DuPage County - Health Dept.  DuPage County - Human Services	St. Charles Township	Northeast Lake/Warren Township	City of McHenry DAR	Lockport Township Senior Shuttle	Escorted Transportation Services	NW Cook and portions of Southern Lake
Dak Park Township	DuPage County - Milton Township Partners	Village of South Elgin	Northwest Lake	City of Woodstock DAR	New Lenox Township Dial-a-Ride	For Seniors Only	Cook and Lake
Palatine Township	DuPage County - Naperville/Lisle Partners	City of Elgin	Round Lake Area Call-n-Ride	McHenry Township Senior Express	Park Forest Dial-a-Ride	Fox Valley Older Adults Services	DeKalb and NE Kendall
			Southwest Lake (Subcription servicefor Wauconda and				
	DuPage County - Senior Services	City of Geneva	Cuba Township residents to get to Countryside Association. This service is not open to non-Countryside	Grafton Township Senior Transportation	Plainfield Township Senior Shuttle		Western Cook and Eastern DuPage
Palos Township			Association clients)			Helping Hand Rehab Center	
Rich Township	DuPage County - Veterans Assistance Program		Vernon Township	Algonquin Township Senior Transportation	University Park Dial-a-Ride	Home of the Sparrow	Cook, DuPage, Lake, McHenry, Will
tickney Township	Milton Township Dial-A-Ride		Lake County Northwest Demonstration Project (Antioch Township, Avon Township, Grant Township, Lake Villa	Nunda Township Senior Citizens Bus	Will County Mobility Management Dial-a-Ride	Medicaid NEMT	All seven counties
			Township, Fremont Township and Wauconda Township)				
							DeKalb and parts of northwest Kendall and southwest
illage of Crestwood				Richmond Township Senior Bus		Open Door Rehabilitation Center	Counties
illage of Elk Grove Village	Pace ADA Paratransit	Pace ADA Paratransit	Pace ADA Paratransit	Pace ADA Paratransit	Pace ADA Paratransit	Pioneer Center	All counties
illage of Forest Park	DuPage County ADA Paratransit	Kane County ADA Paratransit	North & Central Lake County	McHenry County ADA Paratransit Operation	Will County ADA Paratransit		
ity of Hometown			Southeast Lake County				
illage of Orland Hills							+
illage of Orland Park	Human Service Transportation Programs	Human Service Transportation Programs	Human Service Transportation Programs	Human Service Transportation Programs	Human Service Transportation Programs		
/illage of Park Forest	DuPage Center for Independent Living	Veterans Assistance Commission of Kane County	Advocate Good Shepherd Hospital	Family Service & Community Mental Health Ctr.	Beecher Manor Nursing and Rehabilitation Center	-	
/illage of Schaumburg /illage of Skokie	Lifelink Corporation  Older Adults Rehabilitation Services	Ride in Kane Program Sponsors	Antioch Senior Center  Catholic Charities Senior Services	Horizons for the Blind McHenry County Mental Health Board	Catholic Charities, Diocese of Joliet Cornerstone Services	-	
rillage of Skokle /illage of Tinley Park	Range of Motion	Association for Individual Development	Centegra Health Systems	Northern Illinois Special Recreation District	Guardian Angel Community Services		+
/illage of Norridge	Ray Graham Association	Aurora Township	Council for Jewish Elderly	Family Alliance	Helping Hand Rehabilitation Center		
	SASED	Batavia Township	Countryside Assoc. for People with Disabilities	Senior Services	IL Department of Healthcare and Family Services		
Vorth Township		<u> </u>			<u> </u>		
	Spectrum/Little Friends Inc.	Blackberry Township	Deerfield Park District	McHenry County Housing Authority	IL Department of Human Services	-	
ace ADA Paratransit		Campton Township	ElderCARE at Christ Church	McHenry County PADS	Individual Advocacy Group		<u> </u>
lorth Cook County ADA Paratransit	Other Dial-A-Ride Services	City of Batavia	Escorted Transportation Services Northwest	Centegra Health System	Medicaid Non-Emergency Medical Transportation		
South Cook County ADA Paratransit	Village of Dial-A-Ride Service	City of Elgin	Senior Care Volunteer Network	Veterans Assistance Commission	Provena Saint Joseph Medical Center		
Vest Cook County ADA Paratransit	Addison Township Dial-A-Ride	City of Geneva	Glenkirk	McHenry County Workforce Investment Board	Silver Cross Hospital		
	City of Wood Dale Dial-A-Ride	City of St. Charles	Highland Park Senior Connector Free Bus	Senior Care Volunteer Network	South Suburban Recreation Association		
Human Service Transportation Programs	Downers Grove Township Dial-A-Ride	Dundee Township Partners (East Dundee, Dundee Township & Sleepy Hollow)	Home Instead Senior Care		SouthSTAR Services		
Alexian Center for Mental Health	Winfield Township Older Adults and Disabled Bus	Elgin Township	Lake County Health Department	Other Transportation Options	Sunny Hill Nursing Home of Will County		
American Residential Care	York Township Senior Transportation Service	Hesed House	Lake County Workforce Investment Board	Centegra Patient Express	Trinity Services		
Aspire of Illinois		INC Board	Lamb's Farm	Senior Care Volunteer Network	United Cerebral Palsy of Will County		
Avenues for Independence		Kane County	Mundelein Senior Center	Family Alliance Transportation	Veterans Assistance Commission of Will County		
Blue Cap	Curb-to-Curb Services	Kaneville Township	Northpointe Resources, Inc.	Family Alliance Medicar & Service Car			
Center on Deafness	Addison Tourship	St. Charles Township	Pioneer Center	Good Shepherd Courtesy Van			
	Addison Township						
Chicago Dept of Aging		Senior Services Associates	Southeast Lake County Faith in Action Volunteers	Hebron Community Bus Service			
Clearbrook Center		Two Rivers Head Start	Special Recreation Services of Northern Lake	Northern Illinois Special Recreation Association			
			County	· ·			
Country Club Hills	Taxi Subsidy Program	Village of Campton Hills	The Center for Enriched Living	Pioneer Center and PADS Transporta-tion			
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