

Prioritizing Trips

In the hours and days after a significant disaster, the paratransit system may be able to continue serving customers but at a reduced level due to factors such as limited staff availability, road blockages, fuel shortage, or communications disruption. The OpArea EOC may be requesting a portion of the available resources for mutual aid. In this situation, transit operators and their paratransit contractors will need to make decisions about what trips to provide. This process raises issues of best use of resources, protecting the safety of customers and staff, and ADA compliance. Similar issues exist in the period immediately before an emergency for which there is warning.

King County Inclement Weather Plan

The only example we located of a formal plan for reduced level of operations was King County Metro's Adverse Weather Plan (Attachment 9). Since weather emergencies generally have some warning, they are distinct from disasters such as earthquakes or terrorism, but some of the procedures would apply during the recovery phase of an unpredicted disaster. Responses to inclement weather are based on four stages:

- Stage 1: National Weather service or Weathernet forecast predicts a slight (25 percent) possibility of snow.
- Stage 2: National Weather Service or Weathernet forecast predicts a strong possibility (50 percent) of snowfall (minor accumulations).
- Stage 3: Snow falling or accumulations.
- Stage 4: Snow falling with accumulations building.

During Stage 2, some preparations by providers begin and passengers who call reservations in the morning hear the following message:

“Please be advised that inclement weather will be causing substantial delays. Please re-evaluate your travel needs for today, and if your trips are not critical, please cancel them.”

In the afternoon, the following message may be used:

“Be advised that inclement weather will be causing substantial delays. Please re-evaluate your travel needs for today, and if your trips are not critical, please cancel them. Thank you for your understanding. If you are calling to cancel or check on a ride already scheduled, please remain on the line. Our reservation department and Customer Service are closed at this time.”

During Stage 3 provider preparations intensify. In addition, common destinations, facilities, group homes, etc. are contacted. As appropriate, all individuals with reservations/standing rides are notified and encouraged to cancel rides.

During Stage 4, non-essential trips are cancelled, efforts focus on picking up passengers who were dropped off earlier, and service may be suspended. Callers hear the following message:

“Please be advised that this is a Weather Alert day. Service has been suspended with the exception of life-sustaining medical appointments. Regular service will resume when road conditions allow safe travel.”

The policy regarding essential service is as follows:

“During periods of suspension of regular service, ACCESS Transportation vehicles may be available for emergency service including life sustaining medical appointments, trips to pick up prescriptions, groceries and food bank items. ACCESS Transportation vehicles will also provide back-up for King County Metro’s fixed route bus service.

In addition, ACCESS Transportation will make reasonable efforts during periods of suspension of regular service to provide life-sustaining service to customers who notify their call taking center that they need to proceed with their ride. ACCESS Transportation will make the final determination whether the trip can be safely provided.”

During adverse weather, Access paratransit also provides back-up service for lift users of the fixed-route system, for example, if:

- The lift fails on an individual coach
- The coach is unable to reach the zone or stop to safely deploy the lift
- The lift user is stranded at the zone and cannot reach their destination
- The lift user is unable to reach the zone and attempts to flag the bus to stop in a location where the operator is unable to comply.

This service is intended primarily for lift users during the initial chaos of a snowstorm; however, it can also be used in limited circumstances for anyone with a disability who is stranded by the snow or confused by re-routes. There is a procedure for charging the fixed-route operations department for the cost of this back-up service.

Florida

In the period leading up to a hurricane, it appears that Florida paratransit providers generally attempt to prioritize medical trips, identified based on destinations as recorded in the reservations system. In planning for evacuations, Florida paratransit operators have been told by dialysis centers that the centers can perform partial dialysis in half the time normally needed. This allows them to provide treatment to as many people as possible prior to suspension of operations. After operations resume, following the hurricane, the partial dialysis then needs to be completed immediately.

According to staff at VOTRAN, in the period before a hurricane, as operations shift to providing evacuations, all new trips from home are cancelled, with the exception of life-sustaining medical trips that allow the customer to return home before the storm. After the storm, unless normal operations resume, priority is given to medical trips, and then to work and shopping trips.

North San Diego

On October 21, 2007, two major wildfires were announced in San Diego County, one at 9:23 AM in the MTS service area and one at 1:06 PM in NCTD’s service area. At 7:00 PM, NCTD determined that its LIFT paratransit service would begin providing lifeline service only, defined as medical, food, and emergency trips. The intent was to ensure that resources were available for evacuations and to keep operators and equipment out of harm’s way. The agency’s ability to restrict trips was helped by the fact that there was less demand, since many people were not going out. This type of trip purpose limitation is addressed only generally in the Standard Operating Procedure developed by NCTD and MTS (Attachment 1).

ADA Compliance

None of the operators contacted have formally addressed issues of ADA compliance during emergency operations, and FTA has provided only minimal formal guidance on the subject. Limited information available includes the following:

- Staff at VOTRAN indicated their understanding that, during a declared emergency, requirements for ADA complementary paratransit not longer apply.
- NCTD staff noted that FTA staff who attended a session on emergency operations at a CTAA conference indicated off the record that during an emergency normal ADA considerations would go “out the window.” In NCTD’s case, fixed-route service was also disrupted for several days during the fires, with buses operating on Sunday schedules, some routes cancelled or detoured, and some equipment diverted to assist in evacuations, all of which would, in principle, reduce NCTD’s paratransit obligation by some amount.
- FTA staff have provided some informal guidance in emails. One staff person with the FTA Office of Civil Rights stated, “I do not think that the usual paratransit service regulatory requirements would apply in an emergency situation. My intuition is that since the regulatory requirements are meant to apply to normal operations, that they would not restrict what transit providers could do in emergency situations.” Another staff person in the same office stated, “I have no specific answer for you—we would have to handle such an issue on a case-by-case basis. We have not been presented with one thus far. In limited circumstances, this might be considered situations beyond their control (we see the same during blizzards when service is late).”
- Transit agency staff in Rhode Island noted that when service is disrupted by a snowstorm demand drops on its own, since workplaces, schools, and services close and most people choose to stay home if they can.

FTA’s August 2006 document, “Disaster Response and Recovery Resource for Transit Agencies,” addresses a different but somewhat related question, namely, if a transit operator provides fixed-route service via new routes to serve people affected by a disaster, do the ADA paratransit requirements apply to those new routes, and what if the operator doesn’t have additional capacity to provide ADA paratransit on those routes. FTA responds:

“Yes, ADA paratransit requirements would apply to the new routes, However, FTA recognizes that the sudden influx of evacuees who need such assistance may place additional demands on a paratransit system, possibly resulting in unavoidable trip denials, long waits, or an inability to provide next-day service. In determining whether an ADA paratransit system is experiencing significant numbers of trip denials, missed trips, untimely pickups, or long trip times, FTA will take into consideration whether these incidents were due to circumstances outside of the providers’ control.”

Summary

Paratransit operators do limit trips to essential purposes in periods of emergency, including wildfires, hurricanes, and snow. The policies that are applied are not detailed and not always written. As a practical matter, demand limits itself as customers stay home or facilities close. At least in short term situations, ADA compliance does not appear to be an issue and there does not appear to be a need to seek formal guidance from FTA.