# STRATEGIES FOR REDUCING ADA COMPLAINTS



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# Session Objectives

- Why do riders file complaints?
- Impact of complaints on a transit agency
- Why riders stop complaining

# About the Presenter

- Jess Segovia
  - 25 years in public transit
    - Access Services (Los Angeles)
    - City of Avondale (Arizona)
    - Parsons Brinckerhoff (Arizona)
    - Navigator Mobility Consulting
    - Los Angeles Metro

# WHY DO RIDERS FILE COMPLAINTS?

# Why Complaints are Filed

- Unhappy with service received
  - General comments
    - Expand service area
    - Expand hours of operation
  - Specific incident
    - Disrespected by Operator
    - Fear of injury

# IMPACT OF COMPLAINTS ON AN AGENCY

# Impacts of Complaints (-)

- Agency provides substandard service
  - Not responsive to the needs of people with disabilities
- Problems with Operations practices
  - Staff not properly trained
    - Ineffective Operator training program
  - Poor communication processes
  - Recent changes / improvements ineffective

# Impacts of Complaints (+)

- Help identify opportunities for enhancing services
  - Improved training / communication
  - Need for reorganization
  - Outside expertise / support
- Assists with Mystery Rider priorities
- Others?

# WHY DO RIDERS STOP COMPLAINING?

# Why Complaints Stop

- Issue “fixed”
- Rider “gives up”
  - Does not see improvements over time
- Rider education a success
  - Understanding of
    - Policies / procedures
    - ADA regulations

# Why Complaints Stop

- "Quiet before the storm" – lawsuit filing coming
- Asked rider to join Advisory Committee
- Riders move / start using other transit services
  - Fixed route to Paratransit / Dial-A-Ride
- Others?

# STRATEGIES FOR REDUCING COMPLAINTS BY RIDERS WITH DISABILITIES

# True or False?

- Increased Operator sensitivity leads to happier riders / few negative interactions
- Realistic rider expectations lead to fewer negative interactions
- Wheelchair securement expertise leads to fewer delays
- Comprehensive (and clear) policies & procedures lead to fewer Operator issues

# True or False?

- Reviewing multiple sources of data leads to more useful data?
- Multiple oversight processes lead to better identification of opportunities for improvement?

# Improve Complaints Intake

- Complaints intake steps
  - Receive call from rider
  - Enter comments into system
  - Categorize complaint
  - Reviewed by supervisor
  - Forward for investigation

# Improve Complaints Intake

- Inconsistencies & Inaccuracies
  - Enter comments into system
    - Misinterpretations by various employees
  - Categorize complaint
    - Many complaints have multiple “elements”
    - A single category is inaccurate
      - Inaccuracies affect usefulness of data

# Improve Complaints Intake

- Complaints categories
  - Most common complaints
    - Pass-ups
    - Operator Conduct
    - Denied Assistance

# Investigation Process

- Investigation process quality
  - Use all available information
    - Comments / video / audio
    - Follow-up call
  - Who is doing the investigating?
    - Take role seriously
    - Staff Consistency
    - Formal procedures followed by all

# Investigation Process

- Additional Considerations
  - Investigation process quality (continued)
    - How is information tracked (system)
  - Oversight of complaints processes
    - Are findings reviewed
  - Responding to customer
    - How much information is shared
    - How quickly is response given

# Using Complaints Data

- How is complaints data used?
  - Reports
    - Monthly / quarterly
    - Accessibility
  - Discuss in meetings
    - Is data reliable
    - How to improve services

# Using Complaints Data

- How is complaints data used?
  - Staff training
    - Refresher training agenda
      - Use of specific mobility devices
      - Sensitivity Training
      - Specific Operating Policies / Procedures
    - Publish Operations Notice/s
    - Modify Mystery Rider survey

# Operating Policies/Procedures

- Policies vs. Procedures
  - What's the difference?
- All agencies have policies
  - Some don't have procedures
- Need to be…
  - Comprehensive
  - Compliant with ADA
  - Responsive to needs of disability community

# Operating Policies/Procedures

- Reviewed regularly
  - By whom
  - Review triggered by
    - Complaints
    - Lawsuits
    - Mystery Rider findings
    - Supervisor observations
    - Claims

# Operator Training

- Operators have toughest job in public transit
- Set expectations from the start
  - Assisting riders with disabilities is not “extra”
  - To serve all users of transit
- Comprehensive basic training
  - Extensive hands-on exercises
    - Wheelchair securement
    - Boarding / alighting assistance

# Operator Training

- Invite people with disabilities
  - Recommended practice by FTA
  - Service Animals / Wheelchair users
  - Hold a discussion on sensitivity
- Disability simulation exercises
  - Visual Impairment Glasses
  - Board / alight in wheelchair
  - Others?

# Operator Training

- Who needs accessibility training
  - Operators
  - Road Supervisors
  - Dispatchers
  - Management
  - Others?

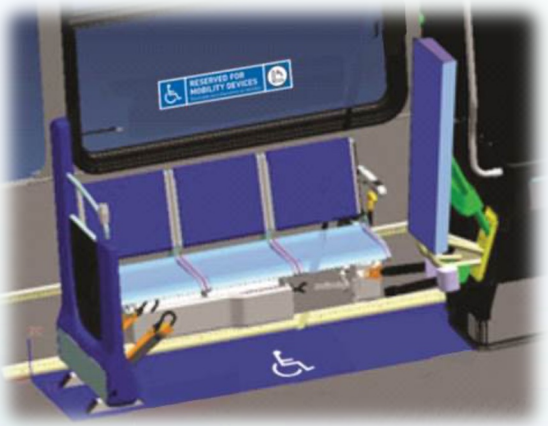
- A new policy is implemented…
  - Who received training first and why

# Operator Training

- Do all Operators need improvement?
  - 10% of the people cause 90% of the problems
- How do we prioritize who receives training and when?
  - Focus on “raising the floor”
    - Complaints / Mystery Rider Program / line rides

# Vehicle Design

- Modern fleet of vehicles
  - Enhanced accessibility features




# Vehicle Design

- Modern fleet of vehicles
  - Enhanced accessibility features



# Rider Outreach/Education

- Many complaints begin with misinformation
  - Lack of understanding of:
    - Agency policies
    - ADA requirements
- Riders Guide / Code of Conduct
  - Must be:
    - Detailed
    - Easy to understand

# Rider Outreach/Education

- Creation / reliance on Advisory Committee
  - Disability community perspective
  - Helps protect agency
- Disability community organizations
  - Braille Institute
  - Bus - ADA requires announcements "at regular intervals"
    - What intervals are reasonable
    - Seek direction from organizations (and document it!)

# Rider Outreach/Education

- Common rider issues
  - Mandatory wheelchair securement
  - Service Animals
  - Clearing wheelchair securement area
    - Non-disabled riders in disabled seating area
  - Operator assistance requirements
  - Stop call outs (fixed route bus)
  - Others?

# Rider Outreach/Education

- Mobile wheelchair marking and tethering program
  - Team of securement and outreach experts
  - Solicit survey responses
- Website accessibility
- Alternative formats
  - ADA requirement
- Title VI policy

# QUESTIONS?

# THANK YOU!

- Jess Segovia, ADA Guru
- www.ADAguru.co
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- Phone 626.379.8400
- Available webinar topics
  - ADA Req's for Fixed Route / Demand Responsive Services
  - ADA Paratransit Eligibility Determination
  - Enhanced Wheelchair Securement Training
  - ADA Compliance 365 Training Series