



STATE OF WASHINGTON  
JOINT TRANSPORTATION COMMITTEE

# Special Needs Transportation Coordination

Draft Final Report

November 2008





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# Chapter 1. Introduction/Background

## Project Summary

Most people take their mobility for granted by virtue of the fact that they are able to get into a car, walk, or take a bus to get to where they need to go, whether that is to a job, school, medical facility, library, or shopping center. Others, however, because of age, disabling condition, or income status have compromised mobility; as a result, they may not have immediate access to services or programs they need. In such cases, alternative transportation methods are required. This Special Needs Transportation Coordination Study was commissioned by the State of Washington Joint Transportation Committee (JTC) to examine and evaluate the effectiveness of special needs transportation within the State of Washington. In particular, the JTC is interested in exploring opportunities to enhance coordination of these programs to ensure they are delivered efficiently and without duplication, and that they result in improved access and increased mobility options for those who need it.

The study was authorized in 2007 through the passage of Substitute House Bill (SHB) 1694, which also extended the duration of the Agency Council on Coordinated Transportation (ACCT) through June 30, 2010. ACCT is a Council of State agencies, transportation providers, consumer advocates, and legislators with the mission to:

- Promote the coordination of special needs transportation
- Provide a forum for discussing issues and initiating change
- Provide oversight and direction to the state's coordination agenda
- Report to the legislature and propose legislative remedies

A number of specific tasks were identified which, in their entirety, comprise this final study report. The report is intended to present an assessment of current conditions and the environment for the provision of special needs transportation, and to suggest a range of alternatives to improve and enhance the effectiveness of these services.

The tasks, as outlined by the legislation directing this JTC study, include the following:

1. Conduct a statewide inventory of special needs transportation services
2. Identify federal funding and related barriers to special needs coordination
3. Examine service models in and outside of the state
4. Review siting of facilities serving persons with special transportation needs
5. Identify methods to improve coordination among agencies and providers
6. Convene a series of four forums to allow participation by a range of study stakeholders

In addition to reviewing legal and programmatic changes and best practices necessary for providing effective coordination of special needs transportation, this study provides an opportunity to examine the effectiveness of ACCT in undertaking its charge, and to consider options for continuing or revising its mission.

## Special Needs Population Groups in Washington State

For purposes of this study, the definition of persons with special transportation needs is that adopted by the Washington State Legislature: “Those people, including their attendants, who are unable, because of a physical or mental disability, income status, or age, to transport themselves or purchase appropriate transportation.”<sup>1</sup> Customers of special needs transportation are considered to be low-income of any age, youth, older adults, or persons with disabilities.

The 2006 Census estimates that there are approximately 6,400,000 people living in Washington State. Figure 1-1 illustrates the incidence of youth, older adults, those with disabilities, and those of low-income status. To some extent, there is overlap among these groups. For example, seniors are more likely to be disabled than younger people, as the presence of a disabling condition increases with age. Persons with a disability are also more likely than other segments of the population to be of low-income status.

**Figure 1-1 Statewide Basic Population Characteristics<sup>2</sup>**

	Youth	Older Adult	With Disability	Low Income	Disabled and Low Income	Older Adult with Disability
Percentage of Total Population	23%	11%	18%	18%	28%	42%

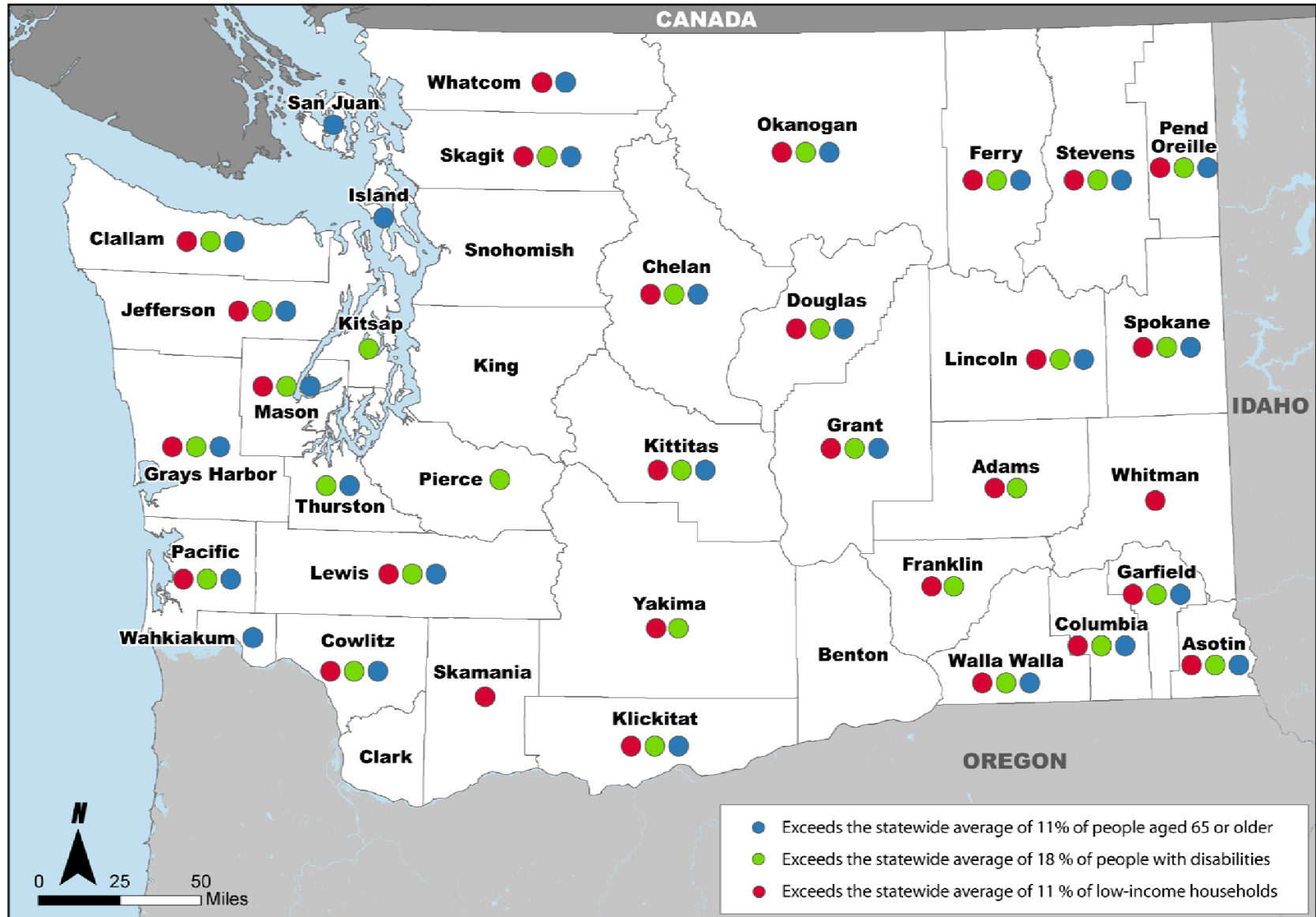
Source: 2000 US Census

Figure 1-2 shows those counties where the proximity of those groups exceeds the statewide average.

<sup>1</sup> Washington State Legislature, Revised Code of Washington (RCW) 81.66.010

<sup>2</sup> Youth defined as age 15 or younger (unable to drive), Older Adult defined as age 65 or older, Disability as self-defined in the US Census, Low Income defined as federal poverty level or lower.

Figure 1-2 Special Needs Transportation Populations by County



Data Source: ESRI, Census 2000

## Project Methodology

The methodology used to support key findings generated and discussed in this report is described below:

**Stakeholder Interviews:** Dozens of in-person or telephone interviews were conducted with key project stakeholders, or with staff associated with investigating key tasks. These stakeholders are listed in Appendix A, and include: elected officials that serve on the Joint Transportation Committee; Washington State Department of Transportation (WSDOT) staff, including the Secretary of Transportation and ACCT staff; several non-profit agencies serving as Medicaid brokers; transit agency staff; and various state agencies that sponsor transportation, most notably the Office of the Superintendent of Pupil Instruction (OSPI), and the Department of Social and Health Services (DSHS).

**Data Collection:** Various documents, reports, and data sources were collected and analyzed to prepare findings reported in this study. These are described in more detail in the report to explain references used; for example, to develop the inventory. Other resources that have been collected include copies of agency policies or requirements, and documentation of invoicing or reporting methods.

**Case Studies:** As part of this project, the consultant team examined human service transportation delivery and related issues in more detail in four “case study” counties, which are Lincoln, Pierce, Snohomish and Yakima Counties. These counties were selected, in part, because they represent diverse geographic areas of the state, and also represent urban, suburban, small city and rural constituencies. For these counties, site visits were made to meet with local project stakeholders in order to learn first hand about barriers that may prevent effective delivery of services, or to learn about successful practices and policies that could be replicated elsewhere. The case studies also allowed for a more in-depth assessment of how services are funded at the local level, and about the range of providers that participate in that particular community.

**Best Practices:** The purpose of identifying best practices is to learn from coordination models adopted by other states and to compare and contrast those models with Washington. The objective within this analysis is to identify strategies, programs and practices that could improve coordination in Washington. Findings from this task were presented at a practitioner workshop held in Olympia on July 17, 2008 in Olympia, with participants offered an opportunity to discuss key findings and how they may be replicated in Washington State.

**Stakeholder and Public Forums:** Four public forums were held in the case study counties as part of this study. The first two forums were convened on May 5 and May 7 in Yakima and Everett, respectively. Additional forums were held on September 23 and September 26 in Davenport and Tacoma, respectively. The goals of the forums were to:

- Learn more about social service transportation delivery at local level: who are providers and funders? How well do they coordinate?
- Learn, from the customer and service providers points of view, about major barriers to coordination, and potential strategies to address the barriers.
- Provide an opportunity for stakeholders to share observations and offer suggestions.



Participants included users of transit services, providers of local transportation services, Medicaid transportation brokers, and other sponsors of client transportation. Forum materials are included in Appendix B.

## Organization of the Final Report

The entire report is organized in ten chapters, as described below:

**Chapter 1** presents an overview of the project, its sponsorship by the Joint Transportation Committee, and the goals of the project. It provides a snapshot of relevant demographic statewide characteristics of interest to this study, and describes the methodology used to carry out project tasks.

**Chapter 2** documents the range of available public and private transportation services, including public fixed-route and dial-a-ride (paratransit) services, and transportation services provided or sponsored by other social service agencies. These were identified through review of existing documents, and through local stakeholder interviews.

**Chapter 3** examines the role of the statewide coordination council, ACCT, and offers observations about its effectiveness.

**Chapter 4** discusses the spectrum of coordination opportunities, and summarizes barriers identified that are preventing coordination from occurring in Washington as well as opportunities to enhance coordination.

**Chapter 5** presents findings that emerged from four case studies of Lincoln, Pierce, Snohomish and Yakima Counties. The case studies offer an opportunity to examine transportation needs and concerns, and current coordination activities at the local level.

**Chapter 6** discusses issues related to decisions that are made with respect to location of facilities that serve special needs transportation customers. It suggests opportunities on how to influence decisions regarding facility siting.

**Chapter 7** presents a range of best practices and model programs elsewhere in the country that are intended to illustrate alternative approaches that can be useful and relevant for Washington State stakeholders and program administrators.

**Chapter 8** discusses the challenges inherent in collecting and reporting data to document service characteristics and efficiencies (i.e. operating costs, levels of service), and also offers suggestions on developing a uniform method of cost reporting.

**Chapter 9** suggests a range of recommendations intended to improve how special needs transportation services are coordinated in Washington State.

**Chapter 10** summarizes the recommendations and identifies potential action steps and champion to implement these recommendations.



## Chapter 2. Providers and Funders of Special Needs Transportation in Washington

This chapter describes the current environment in Washington State with respect to providing and funding special needs transportation. First, it seeks to identify the range of special needs transportation service providers in order to better understand their basic characteristics and identify those which may be suitable for transportation coordination. It also details the various sponsors of human service transportation within the State of Washington and references funding sources for these programs.

The following sections describe the methodology as well as key findings and pertinent details about the transportation providers. Appendix C includes the inventory of identified providers and some basic service characteristics about them.

### Social Service Provider Inventory: Key Findings

- The five data sources identified **623 organizations/agencies** that provide some level of special needs transportation in the State. Of these, 159 represented unique providers that met the screening criteria and provided information of the five service categories.
- There is **no typical provider** or service offering, but non-profits represent slightly more than one half of the identified providers, and a vast majority of services are door-to-door demand-response service.
- Many of the **non-profit providers also serve the general public**, especially in rural areas.
- **Seniors and persons with disabilities** have the greatest access to special needs transportation. The minimum age to qualify as a senior varies among providers, ranging from 55 to 75 years old.
- Some services for the disabled are focused on **specific populations**, such as cancer patients.
- Services are **typically provided on weekdays** (Monday through Friday) only, with a third of the providers operating on weekends as well.

### Methodology/Data Sources

There are virtually hundreds of agencies or programs that provide transportation for specialized client groups. Among these are faith-based organizations, civic or community-based groups, youth programs, schools, public transit agencies, human service programs, hospitals, employers, and others. Many of these programs operate with private funding, which makes it difficult or impossible to quantify the services they provide. In most cases, services are limited to a specific customer group (i.e. Boy Scouts, cancer patients, veterans) and are not available to the general public.

For purposes of this study, an inventory was conducted in order to identify and learn about special needs transportation providers in Washington State that may be candidates for

coordination. It is important to note that the study inventory does not include the entire universe of providers as screening criteria were applied to limit the scope of the inventory.

The following outlines the inventory's screening criteria used to identify providers with the greatest opportunity to participate in, and benefit from, coordination. Those providers that met one or more of the following criteria, then, were **excluded** from further analysis:

- **No public funding:** Only those transportation providers that received state or federal funding were included.
- **Small operations:** Those providing fewer than 500 trips per year were eliminated from further analysis
- **Market-rate private services:** Private companies operating primarily market-rate taxi or shuttle services were not included.
- **Medicaid providers:** The inventory includes the Medicaid brokers, but not the individual Medicaid transportation providers.
- **School districts:** The inventory does not include transportation provided by school districts; although, information was collected through the Office of the Superintendent of Pupil Instruction (OSPI) and is included in subsequent portions of this document.

The inventory's analysis was limited to those providers identified in available datasets and planning studies or those identified by stakeholders. Many religious organizations, volunteer programs, or social service programs providing transportation may not be included in the inventory because (1) their annual ridership falls below the selection criteria, (2) they don't report transportation statistics, or (3) they were not included in the available data sources.

This inventory relied on five major sources, including:

- **Washington State Summary of Public Transportation:** Annual Washington State Department of Transportation (WSDOT) report on the status of public transportation in Washington State (required by Section 35.58.2796 RCW)
- **Washington State Summary of Community and Brokered Transportation:** A one-time ACCT report(2005) on providers not addressed in the *Washington State Summary of Public Transportation*, namely the 33 community transportation providers that received grants through WSDOT during the 2003-2005 biennium and the eight Medicaid transportation brokers
- **Coordinated Public Transit Human Services Transportation Plans:** Regionally developed, coordinated public transit-human services transportation plans are required in order to access specific Federal Transit Administration funds under Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) federal legislation
- **Washington State 211 Social Service Information Network:** Community resources database containing over 8,200 health and human service providers in Washington State
- **Puget Sound Find A Ride Program:** An on-line resource providing a searchable database to allow people with special transportation needs, case managers, and agencies to find transportation services in the Central Puget Sound Region

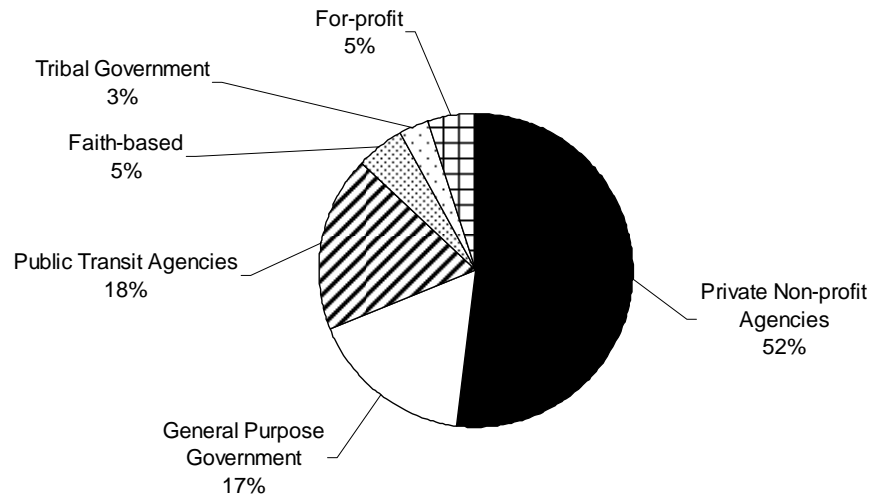
The final analysis collected data under five primary parameters to describe the services offered and who is eligible to use them. Data were collected in the following categories:

- **Service area:** geographic area served

- **Agency type:** the nature of the agency or organization providing the service including those that are non-profit, Public Transportation Benefit Areas—PTBAs, general purpose government, for profit, tribal government, a transportation authority, religiously affiliated, or an Unincorporated Transportation Benefit Area Special District
- **Days of service:** the days of week that the service is available
- **Service type:** the nature of the service design, which includes dial-a-ride/demand response, volunteer drivers, fixed route, deviated fixed route, intercity, vanpool, job access transportation
- **Passenger type:** who is eligible to use the service, options include general public, senior, disabled, low-income

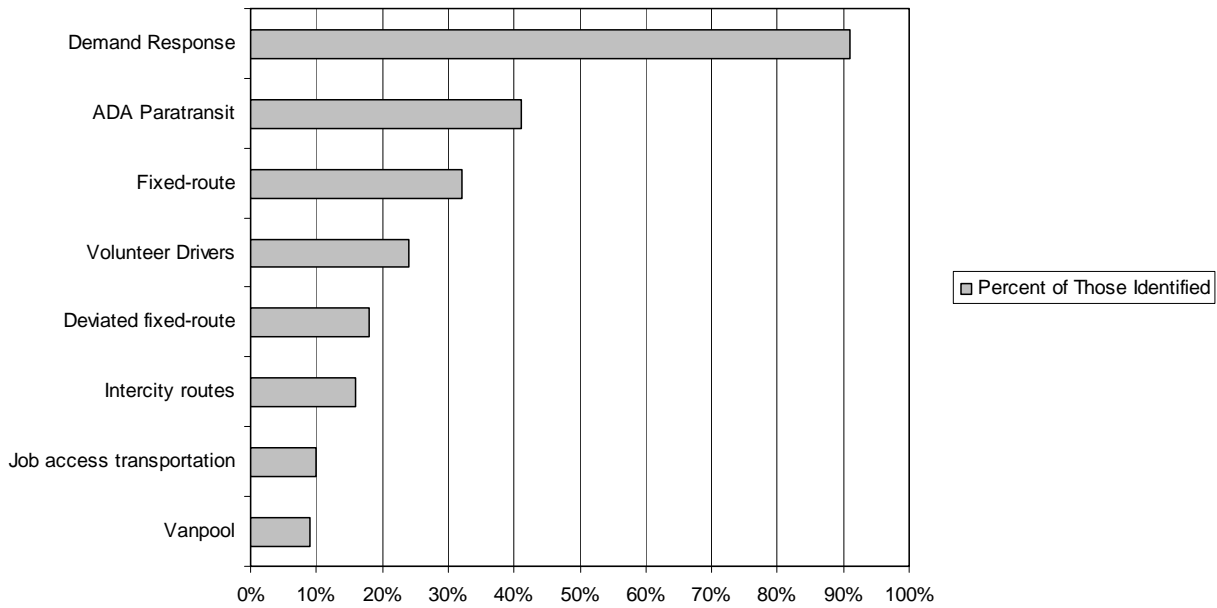
The figures below detail provider characteristics. Figure 2-1 illustrates the types of agency that serve as special transportation providers and indicates that about half the providers are private non-profit entities. Figure 2-2 illustrates the types of services provided by the various providers; many provide more than one type of service. Figure 2-3 describes the types of passengers served by the special needs providers, and shows that most of the providers serve older adults and persons with disabilities. Figure 2-4 indicates that half the service providers operate only Monday through Friday.

**Figure 2-1 Providers by Agency Type**



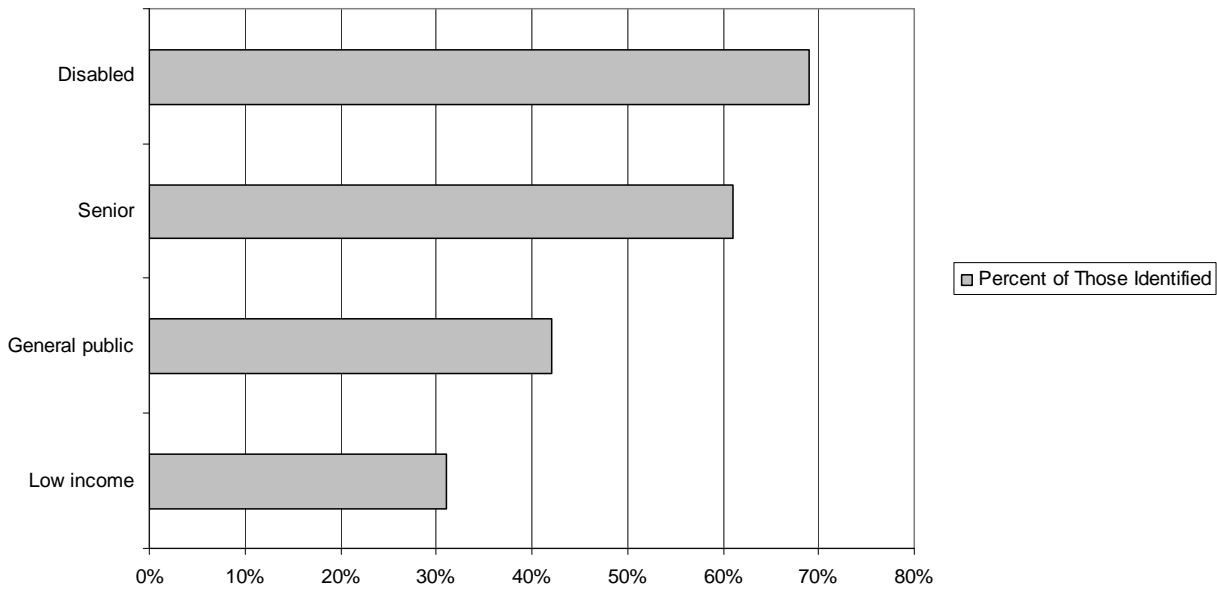
Note: One hundred forty-four (144) providers are identified by Agency Type

**Figure 2-2 Providers by Service Type**

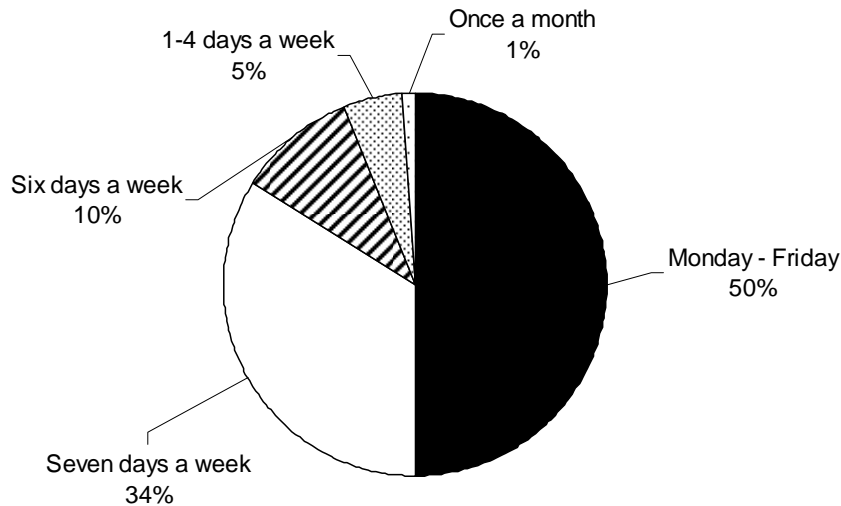


Note: One hundred twenty-eight (128) provider service types were identified. Many providers offer more than one type of service

**Figure 2-3 Providers by Passenger Type**



Note: One hundred forty-seven (147) providers are identified by Passenger Type. Many providers serve more than one population group.

**Figure 2-4 Providers by Days of Operation**

Note: One hundred twenty-nine (129) providers are identified by days of operation. \*One provider operates daily as needed.

## Sponsors of Special Needs Transportation in Washington State

In addition to identifying the transportation service providers, it is important to understand how special needs transportation programs are funded. This portion of the report describes the operating and funding environment for human service transportation service delivery within the State of Washington. It identifies the primary sponsors of human service transportation, and references funding sources as well as regulatory requirements that guide the use of those funds.

The four most significant sponsors of special needs transportation programs include:

- Public transportation agencies
- Community transportation providers (WSDOT Grant Program)
- State-funded human service programs
- Washington State Office of the Superintendent of Pupil Transportation (OSPI)

As explained further in this document, each sponsor funds transportation often using a variety of sources, which are usually dedicated to a particular clientele or are otherwise restricted in their use. A fundamental challenge in coordination of human service transportation programs, then, is to understand and document the sources and possible applications of the funds. The respective sponsors of specialized transportation and the funding sources they use are described below.

### Public Transportation Agencies

Within the State of Washington, there are 28 local governmental public transportation systems. Of these, seven are systems serving urbanized areas, eight serve small city areas, and 13 are systems serving rural areas. Throughout the state, public transportation provides access for

millions of people to get to work, school, medical appointments, and other everyday activities. Many older adults, persons with disabilities, youth and low-income individuals rely on public transit services to meet their mobility needs and do not use specialized services. The use of public transportation is encouraged by two federal requirements:

- Discounted Fare Requirement
- Americans with Disabilities Act

### **Discounted Fare Requirement**

Public transit operators are required to provide a discount of up to 50% of the regular fixed route fare, during off-peak hours, to seniors (defined as age 65 or older) and persons with disabilities (definition is locally determined). This discount provides a strong incentive for older adults and persons with disabilities to use the fixed-route transit service if they are able to do so.

### **Americans with Disabilities Act (ADA)**

The Americans with Disabilities Act was enacted in 1990. The ADA is civil rights legislation guaranteeing access to services and programs for persons with disabilities. The law has had significant impact on the provision of public transit for persons with disabilities in that the fundamental premise of the ADA is to ensure equal access to the same services and programs for persons with disabilities as enjoyed by other members of the public. As a result, public transit operators have taken numerous steps to ensure their systems are accessible for persons with disabilities, including:

- Equipping fixed-route buses with lifts or ramps so that wheelchair users (or persons with other mobility devices) can use the bus
- Ensuring that existing key rail stations and all new rail stations are accessible and meet ADA accessibility requirements
- Designing and building new facilities to comply with the ADA
- Making voice announcements of stops and stations to help blind or visually impaired people navigate the system
- Making written or other materials available in accessible formats upon request

Some persons with disabilities, however, cannot independently use the fixed-route service even with these accommodations. For these individuals, transit operators are required to provide complementary paratransit services. Paratransit is specialized, typically pre-scheduled transportation provided by taxis, cars, accessible vans or buses for people with disabilities. Although each paratransit provider has unique service characteristics, ADA paratransit services are available for any purpose and there is no limit on the number of trips an ADA-eligible person may take.

### **ADA Paratransit Eligibility**

Not all persons with disabilities are eligible for ADA paratransit services; nor is eligibility conferred based solely on age. Many seniors are, in fact, not eligible to receive ADA paratransit services if it is determined they are capable of making use of the regular transit service. Persons are entitled to receive ADA complementary paratransit services only if their temporary or permanent disability prevents independent use of fixed-route services. Public transit operators that provide ADA



complementary services have established eligibility processes that are intended to determine whether their customers meet one of these three conditions:

1. They are unable to independently board, disembark or carry out functions needed to complete a trip
2. There are no accessible services at the stop the applicant needs to use
3. The applicant can't travel independently to or from the bus or rail station they use.

If a wheelchair user, for example, is able to independently make use of an accessible vehicle for his or her travel, that person is not eligible for paratransit services according to the ADA. A person may be determined eligible for paratransit for some trips but not for others. For example, some people may have a disabling condition which changes with weather conditions, or which is episodic in nature. Some persons with developmental disabilities are able to use transit for some trips, but may not be able to successfully navigate the system for new or unfamiliar trips.

As transit operators have replaced inaccessible vehicles with new buses that meet ADA standards, fewer people are eligible under the second category identified above. Most people are determined eligible under the first or third categories.

### **ADA Paratransit Service Standards**

As mentioned, the intent of ADA paratransit services is to provide a service that is complementary to the fixed route services. This means, for example, that service is provided where the fixed route service operates, and during the same hours of service. ADA paratransit service is required to meet the following service standards.

- Paratransit service is provided the same days and times that the fixed route operates
- Service is to be provided within ¼ mile of existing transit routes (excluding commuter service)
- The passenger may be required to pay twice the regular fare as on the fixed route service
- Service is required to be provided from “curb to curb,” meaning that the driver is not obligated to go to the passenger’s door
- A transit operator is not allowed to turn down or deny trips—any trip purpose is considered eligible
- A transit operator is allowed to “negotiate” the time the trip is delivered up to an hour before or after the trip is requested

Even if a person meets ADA paratransit eligibility guidelines, the service may not fully meet their needs in that it may not operate where or when the person needs to travel, and may not provide a level of service to meet the passenger’s specific mobility needs.

### **Other Demand Response Transportation**

Other paratransit—or demand response—services are often provided in rural or other non-urbanized areas with limited or no public transit. Such services may be operated by a city, community-based non-profit agency, or a senior center, as such they are not obligated to comply with the ADA service standards if comparable fixed-route services are not available. This means

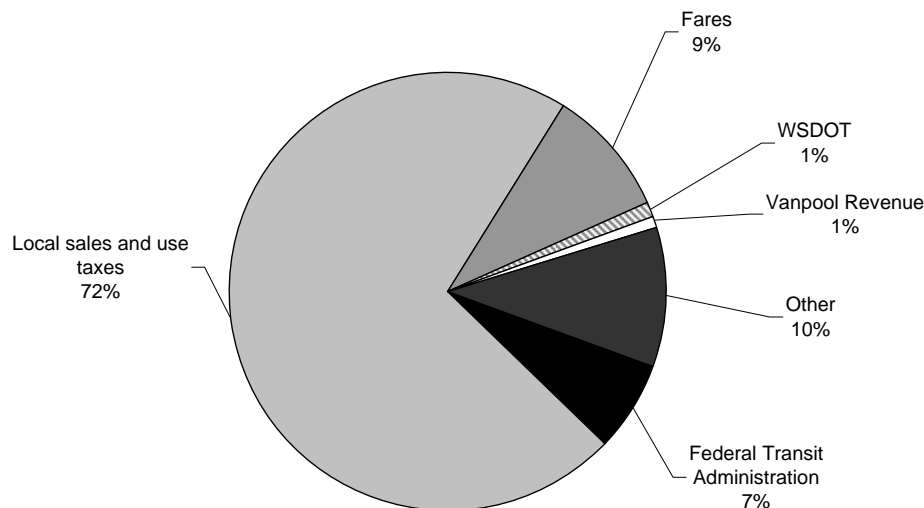
that services may be directed to a particular client group (i.e. seniors) or the services may restrict the types or numbers of trips a passenger is entitled to receive.

Some transit agencies in rural communities may provide “general public dial-a-ride,” which is prescheduled service that is available for the general public as well as seniors and persons with disabilities.

## Funding Public Transportation and Paratransit Programs and Expenditures by Mode

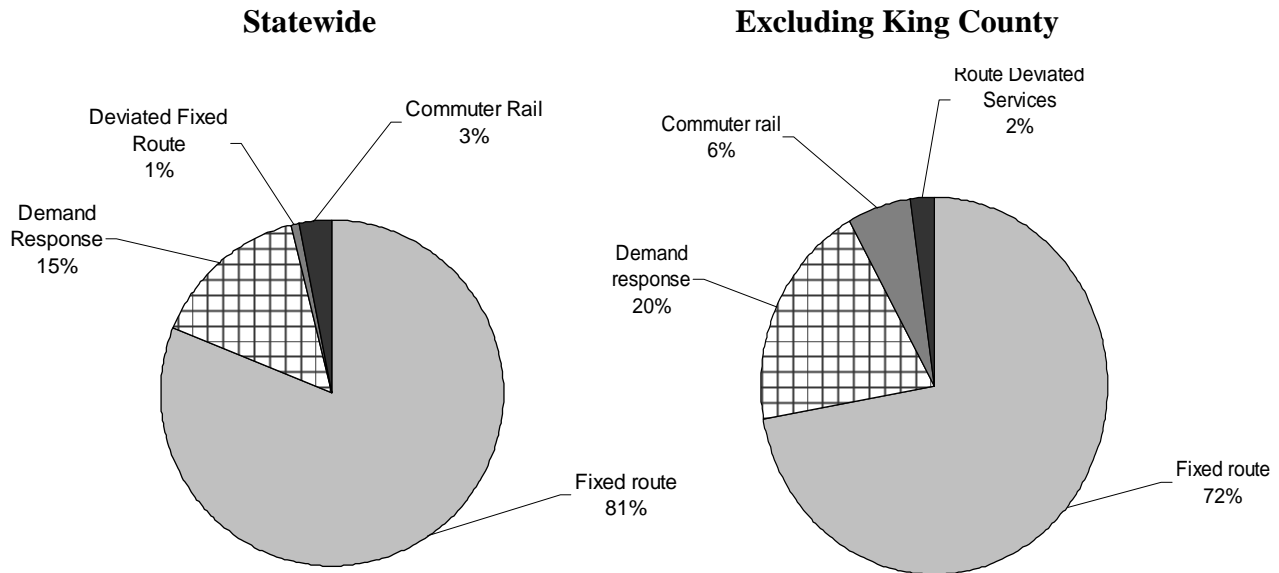
While a variety of funding sources support the provision of public transit operations within the State of Washington, over 70% of operating subsidies are generated locally, through local sales or use taxes. Figure 2-5 illustrates the distribution of revenues that support all (including ADA paratransit) public transportation in Washington.

**Figure 2-5 Public Transportation Operating Revenues (FY 2005-06)**



Source: The Washington State Summary of Public Transportation, 2006, Appendix 5:

Figure 2-6 shows a summary of public transportation expenditures for 2006 by mode. Paratransit, or demand response services, account for 15% of the system total when considering all public transit operators, statewide. It is interesting to note that, when King County, by far the largest funder of public transit, is excluded from the mix, that other public transit agencies devote a higher (20% compared to 15%) of their expenditures to demand responsive services.

**Figure 2-6 FY 2005-06 Public Transit Operating Expenditures by Mode**

Source: The Washington State Summary of Public Transportation, 2006, Appendix 3

## Community Transportation Providers

In addition to public transit agencies, other types of organizations also provide special needs transportation and are supported in part with state or federal transportation dollars allocated through the WSDOT Consolidated Grant Program. These organizations may include transit systems, non-profit agencies, tribal governments, senior centers, state agencies, cities or counties, special districts, or private for-profit operators. Through its consolidated grant program, WSDOT awarded nearly \$59 million in public transportation grants for July 1, 2007 to June 30, 2009 projects statewide. The funding was provided from a combination of state and federal sources.<sup>1</sup>

### State Funding

For 2007-2009, WSDOT awarded approximately \$33 million in state grants for the following programs:

#### *Rural Mobility Grants - \$16.9 million*

Rural mobility grants improve transportation in rural areas where public transportation is limited or does not exist. The grants provide a lifeline for many rural citizens who rely on public transportation to hold jobs and maintain their independence. Through a competitive grant application process, \$8.4 million was awarded to transportation providers in areas not served by

<sup>1</sup> WSDOT created a consolidated grant application process in 2003 to combine the applications for state and federal public transportation grants. Timelines for all state and federal funding awards were brought in line with the state biennium. This allowed applicants to submit their proposals for all types of grant funding just once every two years instead of applying separately for each type of grant program.

transit agencies. Through formula based grants, \$8.5 million was also provided to rural and small city transit agencies.

#### *Paratransit/Special Needs Grants - \$25 million*

Paratransit/special needs grants support public transportation for persons who, because of their age (youth or seniors), disabilities, or income status, are unable to provide or purchase their own transportation. Through a competitive grant application process, \$5.5 million was awarded to non-profit providers of transportation services for the elderly and persons with disabilities. Through formula based grants, another \$19.5 million was awarded to assist transit agencies with providing additional public transportation services for people with special transportation needs.

### **Federal Funding**

WSDOT administers several Federal Transit Administration (FTA) grant programs. For 2007-2009, WSDOT matched state and local funds with FTA funds and administered more than \$21.5 million in federal public transportation grants. Federal grant programs include:

#### *FTA Section 5310 - Elderly and Persons with Disabilities Transportation-\$2.3 million*

Elderly and persons with disabilities transportation grants were awarded to non-profit agencies serving urban and rural areas. In 2007-2009, approximately \$2.3 million was awarded through the competitive grant process to provide vehicles and other equipment.

#### *FTA Section 5311 - Rural Public Transportation-\$13.3 million*

Transportation providers competed for federal rural public transportation grants. Approximately \$13.3 million was awarded for capital, operating, and planning activities for public transportation in rural areas.

#### *FTA Section 5311(f) Intercity Bus Transportation-\$500,000*

Approximately \$1.7 million in intercity bus transportation grants were awarded for the first fiscal year of the biennium to establish, preserve, and enhance rural and small urban intercity transportation.

#### *FTA Job Access and Reverse Commute (JARC)-\$2.9 million*

WSDOT started administering job access grants in 2003 and is managing approximately \$2.9 million in JARC grants. JARC grants are awarded through a competitive process for employment related transportation. The program recognizes that a lack of transportation prevents low-income people from getting to jobs, education, training, child-care, and other job related activities.

#### *FTA Section 5317 New Freedom-\$2.5 million*

Section 5317 funds, which are aimed at reducing barriers to transportation services and expanding mobility options beyond ADA requirements, is a new program started in 2006. It includes transportation to and from jobs and employment support services for persons with disabilities. Approximately \$1.5 million was appropriated for the combined years of 2006 and 2007. Of the \$1.5 million, all but \$200,000 of the funds were obligated for grant projects for the 2007-2009 biennium.

## State Social Service Agency Programs

State social service agencies are another primary sponsor of human service transportation programs. There are substantial differences in the way state agencies approach transportation funding and planning. For example, WSDOT has a relatively formal process for allocating funds, developing and approving transportation projects. Transit agencies tend to approach planning from a system design, route structure, and capacity limitation perspective. Human service agencies focus primarily on individual needs and access to services. Client transportation is usually viewed as an ancillary service; that is, transportation is a means to gain access to a primary service.

This section provides a picture of service delivery for human service transportation services funded by the State of Washington. The methodology employed to collect and synthesize this information consisted primarily of conducting a series of in-person or telephone interviews with Department of Social and Health Services (DSHS) staff in Olympia and in local branch offices, and by contacting local Area Agency on Aging staff.

DSHS is the largest provider of social service transportation in the State of Washington. For this reason, this section focuses primarily on services provided by DSHS. While other state agencies sponsor or fund transportation for their clients, reliable information about the types of services provided, amount of funding spent, or other program characteristics is not available primarily because such data is not collected or reported on by these agencies.

### DSHS

DSHS provides social services to Washington residents. It serves one fourth of Washington residents, which is approximately 2.1 million clients, including children, families, vulnerable adults, and older adults. DSHS provides a variety of services to meet the needs of its clients, including food assistance, financial aid, medical care, vocational rehabilitation, drug and alcohol treatment programs and many others.

DSHS is comprised of the following departments:

**Health and Recovery Services Administration:** administers medical-related services, including mental health, alcohol and substance abuse, legal services, and Medicaid.

**Aging and Disability Services Administration:** is responsible for programs that support developmental disabilities, home and community services, management services, group homes and residential care services.

**Economic Services Administration:** assists with child support, employment and assistance programs, operations support, and refugee and immigrant assistance.

**Children's Administration:** administers programs that protect abused and neglected children and support families in caring for them.

**Division of Vocational Rehabilitation:** assists persons with disabilities who are trying to overcome employment obstacles.

**Juvenile Rehabilitation Administration:** administers community programs, operations support services, and treatment and intergovernmental programs.

HRSA, Children's Administration, and ADSA are the primary programs that sponsor client-based trips. In addition, the Division of Vocational Rehabilitation, which is managed under the Deputy Secretary, provides transportation services to its clients.

### Health and Recovery Services Administration

Health and Recovery Services Administration (HRSA) administers Medicaid-funded trips in Washington State, including those eligible trips that serve clients of other DSHS Administrations. It provides approximately 12,000 non-emergency medical trips (NEMT) per day or 3.2 million trips per year and spent \$65.5 million in FY 2006-2007; average total cost per trip was \$20.

The state spends approximately one percent of its total Medicaid budget on NEMT, which is consistent with what is spent in other states.

#### *Medicaid Transportation Brokerages*

Medicaid is a federal entitlement program that funds basic health care services for low-income people, children, persons in nursing homes, individuals with disabilities and the elderly. Washington State spent more than \$5.7 billion in 2005 for its Medicaid program.

Washington, like other states, administers its own Medicaid program and establishes eligibility standards, payment rates, benefit packages, etc. The federal government mandates that states provide NEMT for Medicaid clients that have no other way to access medical facilities and services. Approximately five percent of eligible Washington State Medicaid clients use NEMT services. About 10% of trips are for kidney dialysis treatments; 21% are for access to mental health programs; 12% are in support of adult day health care programs; and about 14% are to transport clients to and from methadone treatment programs. The remaining trips provide access to various medical treatment appointments or services.

Washington has managed its Medicaid transportation through a brokerage system since 1989. Currently, services are operated statewide under contracts with eight brokers for the state's 13 transportation service regions. DSHS last solicited Medicaid brokers in 2004; contracts were established for a five year period of time. Brokers also review requests for language interpreter services from DSHS-authorized requestors, and arrange for interpreters when needed. Brokers typically operate a call center within or adjacent to the contractual region, thereby enhancing local knowledge and fostering the development of local resources.

Primary services provided by the broker include:

- Operation of a toll-free telephone service for scheduling interpreter services and non-emergency transportation to medical services
- Evaluation and verification of client eligibility, provided service coverage, and appropriate level of transportation
- Contract for, arrange and monitor transportation and interpreter services.

Medicaid funds for NEMT in Washington State consist of 50% federal funds and 50% state funds. As an entitlement program, there is no cap on the number of Medicaid trips that are provided. Trips are provided for all people who meet eligibility requirements, do not have any other available transportation resources, and still need transportation to access covered medical services. Transportation rates paid are determined by the competitive market based on safe high

quality services at low cost. HRSA administers the NEMT Program for DSHS and invoices the federal government for reimbursement.

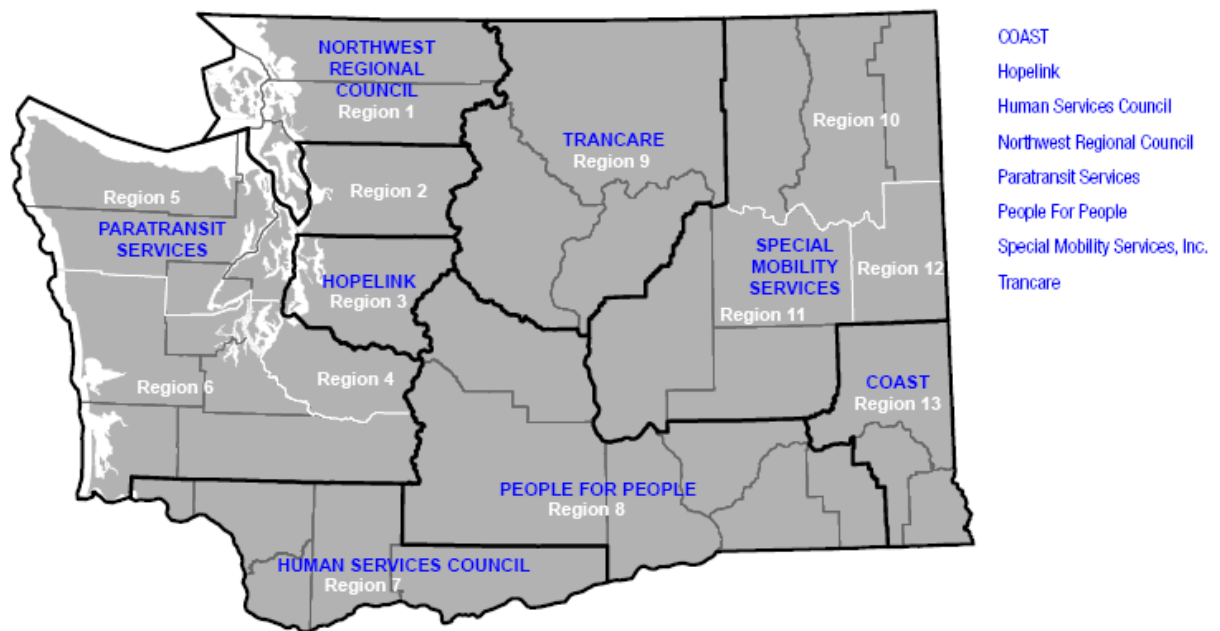
HRSA pays brokers an administrative fee to coordinate the transportation services; approximately 98% of all trips are provided by subcontractors of the broker. DSHS payments for transportation pass through the brokers to their subcontractors. The broker is responsible for and performs all administrative functions of the program including receiving transportation requests, verifying client eligibility, screening clients for mobility status and existing transportation resources, verifying eligibility and coverage of medical events, arranging for transport, billing and payments. The following methods are used to provide transportation to eligible persons:

- Public transportation
- Gas vouchers
- Client and volunteer mileage reimbursement
- Taxi
- Cabulance
- Ferry
- Commercial bus
- Air

Eight agencies serve as brokers for the 13 transportation service regions (as of 2005), as illustrated in Figure 2-7.

**Figure 2-7 Map of Medicaid Transportation Brokers**

**Medicaid Transportation Brokers**



Source: Washington State Summary of Community and Brokered Transportation (2005)

**Total Medicaid Spending:** Washington State spent over \$ 5.7 billion in 2005 for its Medicaid program. The federal government reimbursed the state at a 50 percent rate.

**NEMT Expenditures:** Washington State spent approximately 1 percent of its Medicaid budget on NEMT in 2005. This amounted to approximately \$58 million.

**Utilization Rate:** Approximately 5 percent of eligible Washington State Medicaid clients use NEMT services provided through the brokers.

**Trip Costs:** Washington State's brokers coordinated a total of 3,239,485 trips in 2005 at an average cost of \$17.89 per trip.<sup>2</sup>

## **Aging and Disability Services Administration (ADSA)**

The administration provides long-term care for adults and children with functional and developmental disabilities. There are two divisions that provide social services: Home and Community Services and Developmental Disabilities Division.

ADSA works with clients to establish an individual care plan which documents those social services and supporting services, including transportation that will be paid for by DSHS. In addition to the Medicaid-funded non-emergency medical trips administered by HRSA, ADSA facilitates and funds non-medical trips as part of its programs.

**Home and Community Services:** offers services to adults 18 and older who require long-term care. Services are provided in the following settings:

- Adult Family Homes
- Boarding Homes/Assisted Living
- Nursing Homes
- An individual's own home

Home and Community Services clients, if there is an established need, may be eligible for transportation services for a variety of trips, including shopping, senior center programs, meal programs, and therapeutic services.

ADSA acts primarily as a pass through for federal (Older Americans Act) and state (Senior Citizens Services Act) funding sources. ADSA contracts with 13 Area Agencies on Aging (AAA) statewide to manage case management services, as well as transportation services, at the local level. Local AAA case management staff re-determine eligibility and authorize long-term care services on a yearly bases. Individual trips are provided by care givers who often transport clients as part of the broader program of care. Care givers are reimbursed for transportation services established in the individual care plan.

In addition to addressing individual client needs, local AAAs may provide specialized transportation services such as providing a shuttle oriented to senior needs. In this case, transportation is provided through a contractual arrangement with private or public transportation providers.

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<sup>2</sup> Source: Washington State Department of Social and Health Services, Health and Recovery Services Administration



In FY 2006-2007, Home and Community Services spent approximately \$2.6 million on transportation services. The largest source of funds for Home and Community Services were the following:

- Older Americans Act: Federal funding, \$1,590,962
- Senior Citizens Services Act (SCSA): State funding, \$761,505
- Medicaid Title 19: Federal funding, \$322,591

**Developmental Disabilities Division (DDD):** assists adults and children with developmental disabilities and their families to obtain services and support.

Eligible clients include those who were diagnosed with the following conditions prior to age 18:

- Cerebral palsy
- Autism
- Mental Retardation
- Epilepsy
- Other Neurological Condition

For DDD clients, transportation is typically provided by private social service providers, also known as supported living agencies. In this case, transportation is bundled with a variety of social service programs and is not separately tracked. Alternately, the administration also pays individual contractors to provide trips.

In FY 2006-2007, DDD spent approximately \$635,000 for transportation services. The largest sources of funding was Medicaid Title 19 funding through the Home and Community Based Service Waiver Program, which accounted for \$532,751 of the total amount spent on transportation services.

### **Economic Services Administration**

The Economic Services Administration (ESA) assists low-income families, children, pregnant women, people with disabilities, older adults, refugees and immigrants. ESA also serves children who need child support, paternity establishment, child care, medical insurance, etc. Programs include but are not limited to: Child Support Services, Temporary Assistance to Needy Families, WorkFirst, Washington Telephone Assistance Program, and Food Stamp Employment and Training.

ESA assists clients with transportation so that they can participate in the ESA programs. The local Community Services Office administers the programs and works to find a transportation solution when necessary. Transportation services are often tailored to meet the specific needs of eligible clients and may include: mileage reimbursement, transit passes or reimbursement, car repair assistance, etc. Transportation costs are bundled with other expenses. For that reason, it is difficult to obtain information about the amount spent on transportation services.

### **Children's Administration**

The Children's Administration administers programs that protect abused and neglected children and support families in caring for them. Each client has an Individual Service and Safety Plan that

outlines programs and any required transportation services. The division contracts social services to private providers, which may provide a bundle of social services, including transportation. Transportation services may include bus passes, gas vouchers, or gas reimbursement.

### **Division of Vocational Rehabilitation**

Division of Vocational Rehabilitation (DVR) assists persons with disabilities who are trying to overcome employment obstacles. When necessary, DVR provides transportation services to its clients which may include travel and related expenses necessary to participate in DVR services, such as:

- Bus pass
- Reimbursement for gasoline
- Purchase or repair of a private vehicle.

DVR does not provide any transportation services directly or contract with private providers. Local field offices assist clients with transportation by providing funding and technical assistance. In FY 2006-2007, DVR distributed 1,878 bus passes and facilitated six vehicle purchases and 221 vehicle repairs.

An Individual Plan for Employment (IPE) is developed for each client that specifies programs to be pursued and the transportation that will facilitate participation in them. Field offices provide clients with an Authorization for Payment, based on what is recommended in the IPE. Transportation services are authorized based on the least cost option available to the individual. In many cases, public transit meets clients' needs.

In FY 2006-2007, DVR paid \$438,767 for transportation services. Approximately 80% of the division's transportation funding comes from the U.S. Department of Education's Rehabilitation Services Administration, which administers the funds on a formula basis. Washington State's general funds contribute the 20% local match.

### **Juvenile Rehabilitation Administration**

The Juvenile Rehabilitation Administration (JRA) provides services to youth who have been committed by county courts. While clients are living in group homes, JRA provides necessary transportation, including medical and non-medical trips, as defined in their Individual Plan. JRA provides transportation services in-house using vehicles owned by the administration.

JRA does not rely on Medicaid transportation for NEMT trips because its clients are exempt from Medicaid services, and trips require at least 24-hour advance planning, which is frequently not possible with JRA clients.

Transportation services are paid for using state funds. There is limited trip sharing with JRA clients and no coordination with other human service transportation providers because clients must travel with a security guard. They are not easily grouped with each other or other DSHS clients.

Figure 2-8 provides an overview of the transportation services provided by DSHS, including information about the clientele and purpose served, the transportation programs provided, how the programs are administered, funding sources, and the amount spent on transportation in FY 2006-2007. In some cases, the funding and amount spent on transportation is not available because transportation costs aren't tracked separately.

**Figure 2-8 DSHS Snapshot**

Name of Organization and Program	Clientele/Purposes Served	Transportation Program	Administration	Funding Source	Amount Spent on Transportation FY 06-07
Health and Recovery Services Administration (HRSA)	Medicaid Eligible, for medical purposes	Non-emergency medical transportation (NEMT)	Medicaid Brokerage	Medicaid	\$69 million
Aging and Disability Services Administration (ADSA) -Home and Community Services (HCS) -Division of Developmental Disabilities (DDD)	Older adults (60+) and persons with disabilities	<i>HCS</i> : Variety of trips, including shopping, senior center programs, meal programs, and recreational.  <i>DDD</i> : As needed and defined in IP	<i>HCS</i> : AAA manages  <i>DDD</i> : Contracted supportive living agencies provides transportation or contracts to private provider	Older American's Act Senior Citizens Services Act (SCSA) Medicaid Title 19 (non-medical trips)	\$3.3 million
Economic Services Administration	ESA clients, which may include low-income, pregnant women, older adults, refugees, and people with disabilities	Bus passes, reimbursement for vehicle repair and gas	Local Community Services Office		Not available
Children's Administration	Abused and neglected children and the families that care for them	Bus passes, gas vouchers, gas reimbursement	Local field offices assist clients with transportation services		Not available
Division of Vocational Rehabilitation (DVR)	Persons with disabilities who are trying to overcome employment obstacles	Bus passes, reimbursement for gas, car repair, or purchase of a private vehicle.	Local field offices assist clients with transportation by providing funding and technical assistance.	Federal Rehabilitation Service Administration funds; state funds	\$619,977
Juvenile Rehabilitation Administration (JRA)	Youth who have been committed by county courts	Medical and non-medical transportation	Trips are provided in-house with vehicles owned by JRA	State funds	Not available

## Pupil Transportation

Well over \$300 million per year is spent on pupil transportation to and from school in the state. Since the early 1980s, Washington has been under a statutory commitment to fund the transportation of eligible students to and from school at 100% or as close thereto as reasonably possible. Many of the State's school districts need to augment state funds with local revenues to provide the required to/from transportation along with other transportation services for athletic events, field trips etc.

### Requirements for State Funding of Pupil Transportation

State statutes<sup>3</sup> define which students qualify for state-funded pupil transportation. In general, districts receive funding to transport students between home and school if they live more than one mile from school, unless the student is disabled, in which case there is no mileage limitation. Additional funding is provided if K-5 students live within a mile but do not have a safe route to school.

**Eligible student:** Any student served by the transportation program of a school district or compensated for individual transportation arrangements authorized by RCW 28A.160.030 whose route stop is more than one mile radius from the student's school, except if the student to be transported is disabled under RCW 28A.155.020 and is either not ambulatory or not capable of protecting his or her own welfare while traveling to or from the school or agency where special education services are provided, in which case no mileage distance restriction applies.

**To/from school transportation:** Refers to pupil transportation for the following purposes:

- Transportation to and from route stops and schools;
- Transportation to and from schools pursuant to an interdistrict agreement pursuant to RCW 28A.335.160;
- Transportation of students between schools and learning centers for instruction specifically required by statute; and
- Transportation of students with disabilities to and from schools and agencies for special education services.

**Transportation services for students living within one mile radius from school:** Refers to school transportation services including the use of buses, funding of crossing guards, and matching funds for local and state transportation projects intended to mitigate hazardous walking conditions. Priority for transportation services is given to students in grades kindergarten through five.

The Washington Office of Superintendent of Public Instruction (OSPI) categorizes to/from pupil transportation into two programs. The "Basic" program covers most general needs while the "Special" program provides for children with disabilities as defined below:

**Basic Program:** this category is that daily set of routes that exist to transport students from home to school for their basic education, including those students transported for open enrollment, desegregation, to school (exclusively) midday kindergarten, district-operated Head Start, Early Childhood Education Assistance Program (ECEAP) and other early education programs. Vehicles used on these routes are school buses. Special education, gifted, bilingual, and homeless

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<sup>3</sup> Per Washington Revised Code RCW 28A.160.160

students who are transported along with basic program students are counted as basic program students.

**Special Program:** this category includes the daily set of routes that exist to transport students who, due to the nature of their educational programs, require special transportation from home to school. Special education students are those who have been determined to be eligible for special education services pursuant to Revised Code of Washington (RCW) 28A.155.020 and chapter 392-172 Washington Administrative Code (WAC). Students determined to have a disability under Section 504 of the Rehabilitation Act of 1973 and requiring specialized transportation are also included. Also included are students who require special transportation to special education, gifted, bilingual, or homeless programs located outside their basic transportation service area or at an alternative program time. This category also includes home to school transportation required by the McKinney-Vento Act for homeless students.

### McKinney-Vento Homeless Education Assistance Act

“Homeless” children are entitled the protections of the McKinney-Vento Education Assistance Act. The McKinney-Vento program is designed to address the problems that homeless children and youth have faced in enrolling, attending, and succeeding in school. Under this program, State educational agencies must ensure that each homeless child and youth has equal access to the same free, appropriate public education, including a public preschool education, as other children and youth. In addition, homeless students may not be separated from the mainstream school environment. States and districts are required to review and undertake steps to revise laws, regulations, practices, or policies that may act as a barrier to the enrollment, attendance, or success in school of homeless children and youth.

The Act defines homeless children as “individuals who lack a fixed, regular, and adequate nighttime residence.” The act goes on to give examples of children who would fall under this definition:

- Children sharing housing due to economic hardship or loss of housing;
- Children living in “motels, hotels, trailer parks, or camp grounds due to lack of alternative accommodations”
- Children living in “emergency or transitional shelters”
- Children “awaiting foster care placement”
- Children whose primary nighttime residence is not ordinarily used as a regular sleeping accommodation (e.g. park benches, etc)
- Children living in “cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations...”
- Migratory children who qualify as homeless because they are living in circumstances described above.

The McKinney-Vento Act also ensures homeless children transportation to and from school free of charge, with their choice of what school they want to attend regardless of which district the family resides. It further requires schools to register homeless children even if they lack normally required documents, such as immunization records or proof of residence. To implement the Act, States must designate a statewide homeless coordinator to review policies and create procedures, including dispute resolution procedures, to ensure that homeless children are able to attend school. Local school districts must appoint Local Education Liaisons to ensure that school

staff is aware of these rights, to provide public notice to homeless families (at shelters and at school) and to facilitate access to school and transportation services.

## State Funding Methodology

State funding allocations have changed over time. District allocations are currently derived on a formula basis using the following primary factors:

**Student count:** a count of ridership based on a sampling conducted at the start of each school year.

**Number of trips per day:** most routes have two trips per day (morning and afternoon). However, some trip types have one trip per day, or run less than four days per week and are prorated accordingly. These trips include shuttles between schools and/or learning centers that may only run once or twice a week.

**Distance between bus stops and school:** distance determined by measuring the straight line distance between a bus stop and the school it serves, also known as the radius mile. Districts are funded up to a maximum of 17 radius miles for each student counted.

**Distance weighting factor per radius mile:** OSPI established weighting to “weight” the student count, resulting in more funding for longer distances. The regular and special transportation distance weighting factors are used for 11 different types of trips, including home to school (known as basic tripper routes); in lieu or private party contract transportation, which is transportation provided by a private individual under special circumstances; public transit trips (where the district provides passes or tokens for student riders); shuttles of varying frequency between schools and/or learning centers or special education agencies; and midday Kindergarten pick up and drop off.

**Allocation rate:** a per weighted student allocation rate (in dollars) is set by the Legislature and adjusted each year in the Appropriations Act.<sup>19</sup> This rate is multiplied by the student count, number of trips per day and distance weighting factor to determine funding amounts.

## Funding Levels

### State Allocations

The State currently allocates over \$225 million per school year to basic and special pupil transportation programs. Allocations for special needs transportation account for roughly one third of this amount. Allocations have increased over the last decade with special needs transportation allocations increasing at a slightly higher rate.

**Figure 2-9 Washington State Pupil Transportation Allocations**

School Year	Basic Program		Special Program	
	Allocation	Percent Change	Allocation	Percent Change
99-00	\$117,000,000	-	\$45,000,000	-
00-01	\$119,200,000	2%	\$48,900,000	9%
01-02	\$123,200,000	3%	\$52,500,000	7%
02-03	\$126,600,000	3%	\$56,600,000	8%
03-04	\$129,700,000	2%	\$60,300,000	7%
04-05	\$134,200,000	3%	\$64,500,000	7%
05-06	\$144,900,000	8%	\$71,600,000	11%
06-07	\$151,700,000	5%	\$76,400,000	7%
07-08	\$153,400,000	1%	\$79,600,000	4%

Source: Washington Office of Superintendent of Public Instruction

## Adequacy of State Allocations

The methodology used to determine pupil transportation allocations has been questioned regarding its ability to fully fund to/from transportation. A recent study<sup>4</sup> determined that there is a 95% probability that statewide to/from pupil transportation expenditures exceeded state funding between \$92,619,322 and \$114,376,345 in the 2004-05 school year. This negative variance requires school districts to make up the difference using local funds. The exact value is difficult to determine as local districts have not accounted for to/from transportation independent from other transportation costs. A new accounting system is being used for the 2007-08 school year that will separate to/from expenses from other transportation costs.

OSPI staff estimates current to/from operating expenditures at \$335 million per year. The current state budget allocates \$12.5 million for FY08 and FY09 from Education Legacy Trust Account to offset some of expected shortage. To account for the variances, the funding report reviewed the formula funding methodology and raised a number of issues ranging from how student ridership is calculated to current applicability of the parameters used. The report highlighted that the funding model may not reflect current mandates and realities, calling out special needs transportation requirements as examples of such model deficiencies.

## Investments in School Buses

In addition to funding pupil transportation operations, the state makes a significant investment in purchasing school buses. The FY 2008 state allocation includes \$39 million for school bus purchase and replacement. Funding levels for the previous biennium were similar with \$77 million provided for buses during the 2006-07 school year.

<sup>4</sup> State of Washington Joint Legislative Audit and Review Committee (JLARC), *K-12 Pupil Transportation Funding Study, Report 06-10*, November 2006

Currently, just over 10,000 (yellow school) buses are permitted in Washington State. Most of these are owned by school districts with just 13% owned by contract providers. Of the 7,500 buses reported in use for to/from transportation, about 70% were designated for basic program services with the remaining 2,200 for special program services. The median age for Washington buses is about nine year old—somewhat older than fleets in other states.

## Funding Summary

Figures 2-10 and 2-11 provide a summary of the expenditures for special needs transportation in the State of Washington<sup>5</sup>. Other state agencies funding transportation are not included in these figures as reliable estimates were not available.

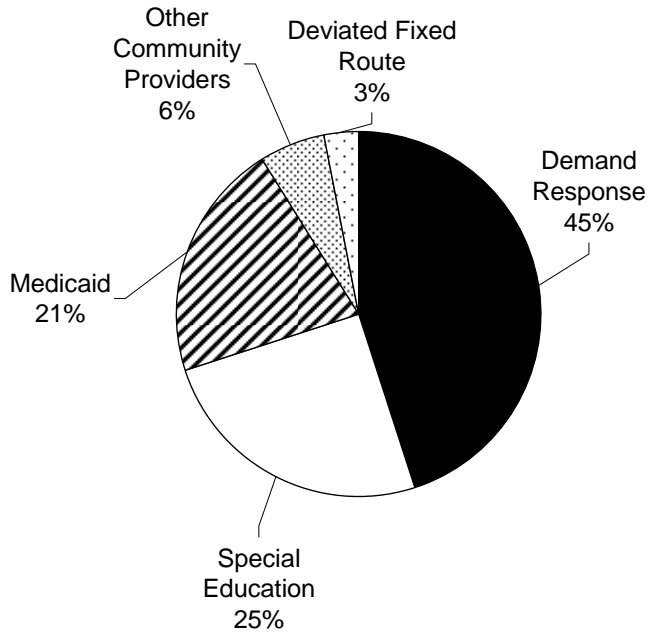
### 2-10 Funding Summary Table: FY 2005-06

Transportation Type and Funding Sponsor	Funding Amount	Percentage
Demand Response (public transit operators)	\$124,000,000	44%
Special Education (OSPI)	\$71,000,000	25%
Medicaid (DSHS)	\$58,000,000	21%
Other Community Providers (WSDOT)	\$18,000,000	6%
Deviated Fixed Route (Public Transit Operators and WSDOT)	\$8,700,000	3%
	<b>\$279,700,000</b>	<b>100%</b>

<sup>5</sup> The figures are estimates based on research and stakeholder interviews. In some cases, the numbers will be lower where agencies do not track the amount spent on transportation.



**Figure 2-11 FY 2005-06 Funding Summary Chart**





## Chapter 3. ACCT

### ACCT Purpose and Membership

ACCT is a Council of State agencies, transportation providers, consumer advocates, and legislators with the mission to:

- Promote the coordination of special needs transportation
- Provide a forum for discussing issues and initiating change
- Provide oversight and direction to the state's coordination agenda
- Report to the legislature and propose legislative remedies

ACCT was originally created by the Washington State Legislation in 1998, with the intent of facilitating communication across organizational boundaries and to encourage and support coordination activities among agencies and other parties represented on the council. Since its inception, ACCT has been reauthorized several times, most recently through June 30, 2010.

Pursuant to the ACCT bylaws (Appendix D), there are ten voting members on the ACCT Council, and four non-voting members, representing the legislature. It is also stipulated in the bylaws that ACCT staffing be provided by the Department of Transportation, and that ACCT be chaired by the Secretary of Transportation or his or her designee.

The designated voting members of ACCT include:

- Superintendent of public instruction or a designee
- Secretary of transportation or a designee
- Secretary of the Department of Social and Health Services or a designee
- Representative from the Office of the Governor;
- Three persons who are consumers of special needs transportation services
- Representative from the Washington state transit association
- Representative from the Washington Association of Pupil Transportation
- Either one representative from the Community Transportation Association of the Northwest or a representative from the Community Action Council Association

The four nonvoting members are legislators, including two members from the House of Representatives and two members from the Senate.

## ACCT Budget and Spending Summary

Figure 3-1 summarizes ACCT appropriations from the legislature since its inception.

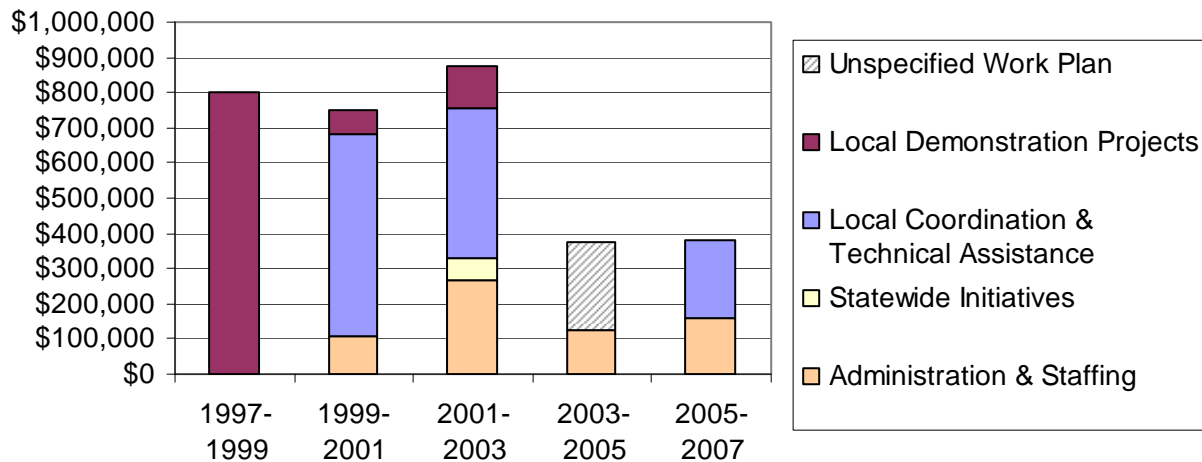
**Figure 3-1 ACCT Appropriations**

Biennium	ACCT Appropriation	Annual Report Year
1997-1999	\$1,000,000	1998, 1999
1999-2001	\$750,000	2000
2001-2003	\$874,000	2003
2003-2005	\$377,000	2004
2005-2007	\$381,000	2007

Source: Compiled from ACCT Annual Reports.

Figure 3-2, below, categorizes ACCT spending for each period. It shows that at its inception, ACCT spent its entire budget allocation on local grants and demonstration projects. Several trends developed over successive reporting periods:

- In **1997-1999**, ACCT funded seven demonstration projects across five counties.
- In the **1999-2001** biennium, ACCT shifted to small (approximately \$20,000) “coordination” grants, awarded to 17 and 24 counties, respectively. It allocated a smaller amount of funding to three local demonstration projects. This funding pattern continued in the 2001-2003 period, but was eliminated in the 2003-2005 period due to funding cuts. A smaller amount of funding (\$72,000 total) is provided in ACCT’s 2005-2007 budget, although 77 percent remained unspent as of October 2006.
- Starting during this time, ACCT collaborated with other agencies on two statewide initiatives, an Oregon-Washington trip planning tool and the WorkFirst Transportation Initiative (WTI), which coordinated federal JARC program funding requests. This seemed to mark an increased emphasis on soliciting outside grants, matched with ACCT and other state and local funds. Outside of staff time, match funds did not come out of ACCT’s legislative allocation, although this changed in subsequent periods.
- In **2001-2003**, ACCT used its budget allocation to fund consultant contracts in support of several statewide working groups, in the areas of schools, Medicaid, and communications. The Medicaid contract supported the Common Ground project with Pierce County, related to cost allocation of shared trips.
- In **2003-2005** and **2005-2007**, ACCT assumed responsibility for federal JARC and GSA homeless children transportation grants (FTA 5310/5311 grants are also listed under its budget).
- ACCT received Community Transportation Association of America (CTAA) grants to provide local technical assistance (in 2003-2005 other state funds provided the match while in 2005-2007 the funds came out of ACCT’s budget allocation). With the reduction in local coalition funding eliminated in 2003-2005, the CTAA funds provided ACCT’s primary funding mechanism for non-JARC local projects.

**Figure 3-2 ACCT Budget Appropriation, Allocation by Spending Category**

Source: Compiled from ACCT Annual Reports. For the 2003-2005 period, the annual report does not show the programmatic distribution of ACCT's budget allocation, listing it only as "ACCT Work Plan."

## ACCT Issues, Concerns and Perceptions

In 2006, ACCT hired a Seattle-based consulting firm, Cocker Fennessy (CF), to perform stakeholder research to identify opportunities and challenges for both special needs transportation and ACCT, including what ACCT's future might be. Twenty-five stakeholder interviews were conducted by Cocker Fennessy, who also facilitated discussions directly with ACCT. The results were summarized in a memorandum addressed to ACCT in November 2006.<sup>1</sup>

The following themes emerged from their research as reflected in the summary report:

1. The mission of ACCT to coordinate and improve transportation services for special needs communities is well understood and viewed as necessary.
2. ACCT should be continued. There is support for enacting a strong legislative mandate as well as full commitment from key players, Governor, Legislature, and major agencies. Participants said that without that mandate, commitment and participation, ACCT's ability to make improvements to special needs transportation is greatly compromised.
3. ACCT is currently under-funded and under-staffed. There is a desire for providing sufficient, sustained and reliable funding for ACCT's internal operations, its grant making abilities, and for special needs transportation services generally.
4. Performance measures should be developed and implemented. Participants said that ACCT needs to develop performance measures and indicators for the work it is coordinating. They feel measures are will help inform and drive policy decisions and they will demonstrate the benefits of coordination.
5. Streamlining and improving the bureaucracy of the overall special needs transportation system is necessary. Interviews stated that the many different

<sup>1</sup> Cocker Fennessy memorandum to Robin Phillips, ACCT Executive Director, November 15, 2006

requirements, regulations, funding mechanisms, etc. create artificial barriers that prevent many resources from being fully used. An example used by many interview participants was the inability to utilize school buses for other types of trips.

In order to assess whether these findings are still relevant and accurate, a brief survey was administered by the project consultant to current ACCT members at their meeting in June 2008. The results were summarized and compared to the Cocker Fennessy findings. The member survey results are consistent with the themes and findings of the Cocker Fennessy stakeholder interview report. In summary, key findings with respect to stakeholder opinions and perceptions of ACCT include:

- ACCT is under-funded and under-staffed and needs a stronger mandate, commitment, and level of participation from major players.
- ACCT needs performance measures to demonstrate accountability.
- ACCT should be given more resources and *authority* to take a more proactive role in transportation planning oversight throughout the state.
- There is strong sentiment to continue ACCT and not to disband it.
- Neither the legislation that established ACCT nor its bylaws provide clear guidance to ACCT staff or members. As a result, there is inconsistent understanding of ACCT's mission or what it should be doing to advance coordination.
- ACCT members themselves want to be more pro-active, but need the tools and authority to do so.

Chapter 9 includes recommendations specific to ACCT and its role as a statewide coordination council.

## Chapter 4. Transportation Coordination in Washington State

As previously indicated, the primary purpose for examining coordination is to promote and support mobility for those people who are unable to transport themselves. Special needs transportation programs are intended to address the lack of transportation that can be a barrier preventing access to employment, health care, or other needed services. Coordination should be viewed as a viable means to achieve this ultimate goal because, if successful, coordination efforts can do more with existing resources.

One study task is to identify funding barriers that may prevent or impede successful coordination of special needs transportation programs. As a first step, it is important to establish an understanding of what is meant by “coordination.” This chapter suggests a definition for and describes various strategies within the “coordination continuum.” The benefits and challenges of coordination are also discussed.

### What is “Coordination” and Why Is It Important?

Coordination is important and of interest to many states that fund human service transportation programs because:

- Coordination of special needs transportation can enable communities to stretch **limited funding** used to support transportation by increasing the efficiency of programs through economies of scale, and by reducing redundant administration, service delivery, and/or capital expenditures.
- Coordination can also help **leverage new funding dollars**. By improving cost efficiency and bringing in new funding to the mix, organizations responsible for providing community transportation can help expand to keep up with a growing demand and/or to provide services to new areas, or during times when there is no service.
- In Washington, as in other states, there is significant investment of public dollars to fund transportation programs. It is in the public’s best interest to ensure that these **dollars are wisely and efficiently used**.

It is important to note that coordination is not a single strategy, but rather a series of options that can range from relatively simplistic actions to complex implementation strategies. This “coordination continuum” often begins with simple networking among stakeholders, and progresses to consolidation, as described below.

- **Networking:** This includes the simplest form of partnerships where participants share a common interest but with no significant action other than information exchange. This might include, for example, the sharing of service policies, a driver training curriculum, a drug and alcohol policy, vehicle specifications, and/or a vehicle maintenance program.
- **Cooperation:** This involves low-level linkages, informal agreements, and some possible resource sharing. This might include, for example, occasional trip exchanges among service providers, or the mutual signing of a memorandum of understanding pledging to adopt comparable service policies.
- **Resource Sharing:** This includes more formal linkages with shared resources to pursue common goals. This might include, for example, joint purchasing of vehicles,

maintenance, fuel, insurance, or training, as well as vehicle sharing. It could also include “allowing” contractors to schedule passengers whose trips are funded with multiple fund sources on a single vehicle at the same time.

- **Collaboration:** This typically entails a sophisticated partnership with strong, formal linkages among partners and complex goals implemented over longer periods of time. For example, organizations may agree to deliver each other’s customers where it is more efficient to do so, or one organization could actually purchase service from another. One organization could also purchase maintenance service or training from another.
- **Consolidation:** This is where one organization assumes responsibility for service delivery of other participant organizations. For example, participating organizations that are responsible for and fund the transportation of their clients or constituents would purchase transportation through a lead agency that directly arranges for and/or operates services for the participating sponsors. Hence, there is a single source to purchase transportation, and a single source through which customers can access transportation. One consolidation alternatives would include transferring the transportation element (including vehicles) from each program to a new (typically non-profit) organization established by the participating organizations for this purpose. Another alternative would be to establish a partial brokerage, managed by a one of the organizations or a private management firm, retained by a lead agency but through which other organizational sponsors purchase service.

Lessons learned from previous studies and similar planning efforts reveal that no one “best” coordination strategy exists. Just as each community is unique, the coordination strategy that will be most effective in one community will be the one that best fits the profile of that area. This takes into account the scope and nature of existing transportation services, the needs of the community, the availability of vehicles and funding resources, and the goals and objectives established by local elected officials and/or the governing boards of local transit and human-service agency programs.

In fact, there is often a blending of these strategies at the local level as evidenced by some examples cited below.

## Status of Transportation Coordination in Washington State

In the course of conducting research and meeting with project stakeholders for this study, numerous examples of locally-sponsored innovative and creative coordination initiatives were discovered. Some of these examples are highlighted below and, while not an exhaustive list, do serve to illustrate that many coordination efforts are already well established throughout the state. For the most part, these coordination activities have been developed and implemented at the local or regional level. Some, such as recently completed Coordinated Public Transit-Human Service Transportation Plans, are the result of federal requirements.

### **Coordinated Public Transit Human Services Transportation Plans**

The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users, commonly referred to as SAFETEA-LU, authorized the provision of federal transportation funding



through Fiscal Year 2009. Projects funded through three programs authorized in SAFETEA-LU, including the Job Access and Reverse Commute Program (JARC, Section 5316), New Freedom (Section 5317) and the Formula Program for Elderly Individuals and Individuals with Disabilities (Section 5310) are required to be derived from a locally developed, coordinated public transit-human services transportation plan. These three sources of federal funds are specifically directed to improve access to jobs for low-income individuals (JARC), improve the mobility of persons with disabilities (New Freedom), and provide capital assistance for programs that serve elderly and disabled persons (Section 5310). SAFETEA-LU guidance issued by the Federal Transit Administration (FTA) indicates that the plan should be a “unified, comprehensive strategy for public transportation service delivery that identifies the transportation needs of individuals with disabilities, older adults, and individuals with limited income, laying out strategies for meeting these needs, and prioritizing services.”<sup>1</sup>

In addition to tying use of the three required sources of federal funds to the plan, WSDOT also stipulated that federal Section 5311 funds<sup>2</sup> and state funds under WSDOT’s purview through the Coordinated Grant Program be tied to the plan. Applicants for WSDOT’s public transportation grant program are required to participate in the planning process with their local Regional Transportation Planning Organization (RTPO) or Metropolitan Planning Organization (MPO). A total of 14 plans were completed statewide. As intended, these planning efforts brought together a variety of stakeholders, including transit operators, schools, cities and counties, human service agencies, advocates for elders, persons with disabilities, and low-income persons as well as members of the public to discuss transportation needs specific to the local community, and to identify and prioritize strategies to address those needs.

There is opportunity to build upon this planning effort by continuing the dialogue and advancing the partnerships that were established through the development of these plans. Plan updates are required to be completed, at a minimum, every four years. A current listing of potential projects must be updated every two years to coincide with WSDOT’s grant program. Furthermore, ACCT is now charged, as the result of the passage of SHB 1694, with recommending to WSDOT approval of the updated plans. While the procedures and criteria to be used in carrying out this mandate are still under development, this step allows for ACCT to assume a meaningful role in ensuring that projects funded through WSDOT are consistent with findings emerging from the coordinated plans or even to establish stronger coordination objectives.

## Local Coordination Councils

Approximately 20 local coordination councils are active within the State of Washington. Many of these local councils were originally established with financial assistance provided through ACCT. Some councils are county-specific (i.e. Snohomish County Special Needs Transportation Coalition (SNOTRAC), Pierce County Pierce County Coordinated Transportation Coalition (PCCTC), while others cover more than one county (i.e. Gorge TransLink includes representatives from Clark, Skamania and Klickitat Counties). Some coalitions meet on a regular basis and have full-time staffing to advance local coordination initiatives, but most do not. Some have adopted bylaws and have developed strategic plans, while others are more loosely organized and meet on an as needed basis.

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<sup>1</sup> Federal Register: March 15, 2006 (Volume 71, Number 50, page 13458)

<sup>2</sup> This federal program provides formula funding to states for the purpose of supporting public transportation in areas of less than 50,000 populations.

For the most part, these local coordination councils formed the basis of the stakeholder groups involved with SAFETEA-LU planning efforts; many broadened their participation in order to ensure a wider range of involvement. Because ACCT funds are no longer available to support local councils, no direct or official ties are in place between ACCT and these local councils and they operate autonomously.

## Medicaid NEMT Brokerage Expansion

As described in Chapter 2, eight brokers designated by DSHS oversee and manage Medicaid non-emergency medical transportation services. Of these, seven are private non-profit agencies and one (Northwest Regional Council) is a quasi-governmental entity.

Although the brokerage infrastructure was primarily set up with Medicaid funds, DSHS has been very flexible in allowing other services to be provided under the brokerage umbrella. In these cases, agencies or programs other than Medicaid purchase or arrange for services through the broker. Those new agencies participating in the brokerage are charged an administrative fee as well as a direct service fee in order to more fairly distribute administrative fees to all agencies that are able to take advantage of brokerage services. Some specific coordination arrangements building upon the Medicaid broker infrastructure are described below:

Over time, Hopelink, a private non-profit agency serving as the Medicaid broker for King County, has expanded its role to include homeless pupil transportation on behalf of local school districts, and also provides services on behalf of Harborview Hospital in Seattle. Hopelink recently began a new program, Bellevue Easy Rider, which is a coordinated program funded through a variety of fund sources, including Sound Transit, DOT, Metro, United Way, and the City of Bellevue. It provides feeder service to the fixed route or takes eligible (low-income, seniors, persons with disabilities) people where they need to go within the service area. Hopelink operates Dial-a-Ride-Transit (DART) under a contract with King County Metro. DART uses smaller buses to serve 14 routes in areas with smaller streets and fewer riders. Although DART is available to the general public, many riders are from low income families that are highly dependent on public transportation for commuting to work or accessing basic services such as shopping and health care. Hopelink also has some smaller contracts with churches and with the Housing Authority.

People for People (PfP) is a private non-profit agency located in Yakima that started 42 years ago as a Community Action Program (CAP), and has been providing transportation for 25 years. PfP serves as the Medicaid broker for Yakima, Kittitas, Benton, Franklin, Walla Walla and Columbia Counties. It also provides the Community Connector service between Prosser, where there are connections to Ben Franklin Transit, and the Yakima Transit Station. PfP recently began operating a fixed route service on behalf of the Yakama Nation with grant funding the Tribe received from the FTA Tribal Transportation Program. PfP also provides some job access transportation with JARC funds; in addition, PfP acts as the 2-1-1<sup>3</sup> service provider.

Paratransit Services, a private non-profit agency that serves as Medicaid broker for Pierce County, plays a significant role in the Beyond the Borders Program. This transportation service fills a significant service gap in the rural parts of South Pierce County. The project currently uses the Medicaid transportation brokerage to coordinate and schedule trips to and from rural South Pierce County. The primary focus of the service is on people with special transportation needs

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<sup>3</sup> 2-1-1 was designated by State statute (ESHB 1787) as the official state number for people to call for information and referral for health and human services and to get information about accessing services after a natural or non-natural disaster.

living outside of the Pierce Transit service area trying to access critical services, employment-related services, and youth activities. Other community members are allowed to ride if coordinated with an existing trip. Paratransit Services also has provided transportation for homeless youth on behalf of some Pierce County school districts.

## Coordination with Tribal Governments

A new tribal transportation program (Section 5311 (c)) was initiated with the passage of SAFETEA-LU. Eligible applicants for these funds are federally-recognized Indian tribes or Alaska Native villages, groups or communities as identified by the Bureau of Indian Affairs in the US Department of the Interior. These tribes must also provide services in non-urbanized areas. Numerous examples demonstrate how tribes and other local programs can and do coordinate their funding in order to mutually meet the needs of tribal members and others.

- The Kalispel Tribe of Indians recently received two operating grants through the Section 5311 (c) program. The Reservation is located in Pend Oreille County, and the nearest incorporated towns are Usk and Cusick (population 212). The Reservation is situated about 18 miles from Newport, the nearest town with amenities such as shopping, grocery stores, restaurants, etc. In order to maximize use of limited funds and to avoid duplication of services, the Tribe contracted with Special Mobility Services (SMS) to operate the new service. SMS serves as the Medicaid broker for five rural counties, and is also a general public provider funded with rural Section 5311 grants administered by WSDOT.
- The Yakama Nation partnered with PfP to provide services through the Yakama Tribal Transit System with a grant through the Section 5311 (c) program. The service is operated by PfP via a standard fixed route system open to both tribal members and members of the public.
- DSHS has encouraged the state's Medicaid brokers to contract directly with federally recognized tribes; to date, 14 such contracts have been negotiated. These contracts allow for the local tribe to serve as a Medicaid service provider for the broker, resulting in increased medical access for tribal members living in remote areas.

## Pilot Coordination Projects

Washington State transportation partners have initiated a number of pilot projects over the years intended to test new concepts, often with the goal of replicating them elsewhere if successful. A number of such projects were sponsored with funds made available by ACCT. Some of these projects are highlighted below:

### Mason County Transit

Beginning in 1998, Mason County Transit (MCT) began collaborating with Mason County school districts to augment its small fleet of five vans with which it provided service to the county's approximately 40,000 residents living in a 700 square mile area. The transit authority arranged to use school buses in the afternoon, when they were not in use for home-to-school transportation, to provide additional public transit service. The deviated fixed routes, which begin service at the schools, serve both the general public and after-school student riders.

The Transit Authority provides the service using school buses and drivers, who are cross-trained to provide transit service as well as pupil transportation. The school buses are designated as transit buses by a magnetic "Mason Transit" sign on the side of the bus. There is no fare for

intra-county trips. The primary motivation behind the coordination arrangement was to find a cost-effective way to provide additional transit service and after-school transportation.

MCT operates the service using school district buses and drivers. It reimburses the districts on a pro-rated basis for the drivers' wages, insurance, fuel, and maintenance. Funding for the service has come from ACCT as well as a local sales tax that was passed by local voters.

## **Common Ground<sup>4</sup>**

The Common Ground demonstration project has been underway, off and on, for 13 years. It seeks to investigate potential efficiencies of combining scheduling of transit ADA and Medicaid-eligible brokered passenger trips. Within the model, passengers were scheduled together on the same vehicle within common service areas. The project consisted of modeling the coordination of trips between Pierce Transit SHUTTLE, the transit ADA provider; and Paratransit Services, Inc., the broker of Medicaid transportation in Pierce County. The project focused on passenger trips to a specific adult day health center, group "on paper" the trips common to both providers, and then analyze the cost benefits of this coordination.

A significant accomplishment for this project was the agreement on a cost allocation model – a mechanism to share the costs and savings of grouping trips. Additionally, the partners identified avenues to share trip information between transit and Medicaid riders while upholding privacy requirements. The project found that Pierce Transit SHUTTLE trips can be routed efficiently in coordination with Paratransit Services, Inc. trips. It also found that Pierce Transit SHUTTLE non-ambulatory (wheelchair) trips are more cost effective, and Paratransit Services, Inc. ambulatory trips are more cost effective. However, this is a preliminary finding. The demonstration project only blended trips from Pierce Transit SHUTTLE with Paratransit Services, Inc. trips. The project did not blend Paratransit Services, Inc. trips with Pierce Transit SHUTTLE. In order to get a true measure of the cost effectiveness of shared trips, the analysis would need to be conducted by both partner agencies.

As of the summer of 2008, the Common Ground project has been discontinued, primarily for the following reasons:

- While the project partners successfully agreed upon a fair and equitable cost allocation formula, actually implementing the formula required intensive labor. To make it easier and more efficient to use, the formula algorithm must be automated.
- Like many coordination activities, the project assumed staff would accomplish necessary tasks on top of existing workloads, when time permitted. However, this project requires time and expertise from a variety of skill areas, including technology, consumer service, policy making, management, and dispatching.
- Concern was expressed by the participating agencies that a major revamping of certain trips could negatively impact the productivity of the remaining trips.
- Due to budget constraints, the anticipated financial commitment from some of the project sponsors was not realized.

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<sup>4</sup> Source: ACCT 2005-07 report to Legislature

## Metro's Community Access Transportation

King County Metro's Community Access Transportation (CAT) started as a pilot project in 2002 and has steadily grown since then. Through this program, Metro provides accessible vans that would otherwise be retired, maintenance and driver training to community-based agencies that serve older adults and/or persons with disabilities to help them better meet their clients' needs. In return, the agencies provide van drivers, cover insurance, and are responsible to schedule and deliver up to 50 one way trips per month for persons who would otherwise be eligible for Access ADA service. As an added incentive, for agencies that provide at least 100 trips per month, Metro provides additional operating funds.

Through a second component of the CAT program, Metro also provides, through a similar arrangement, vans to agencies that transport seniors or people with disabilities to work or training. In return, agencies provide at least 50 trips per month for otherwise ADA eligible persons.

In 2007, 20 different agencies participated in the program which, together, provided 141,368 trips. The average cost to Metro for providing those trips averaged \$5, compared to an average cost per ride on Access of \$36.11. Metro estimates it saved \$1,400,000 through this program.

## Regional Services

One of the themes emerging from this study is the need for customers to have access to a system that is more responsive to their needs for inter-jurisdictional travel. Just as a person making an automobile trip does not necessarily consider city or county boundaries when completing their journey, public transit often needs to better connect communities and provide more seamless service for customers. Many people need to travel for specialized medical treatment in a community other than where they live, or they need to commute to employment centers from various cities or counties within the region. Implementing regional services means that transit agencies serving local communities need to work together to coordinate schedules, develop a common transit hub, and/or share in the costs of delivering services that extend beyond their boundaries. Some examples where this is occurring include:

- Skagit Station delivers multimodal transportation options so that commuters and travelers can converge on a central location in downtown Mount Vernon to switch between Skagit Transit, Greyhound, Amtrak and local taxis. Skagit Station also serves as the hub of the intercounty bus service for the Bellingham Connector, the Island Connector and the Everett Connector, connecting Skagit County with Whatcom, Island and Snohomish counties, respectively.
- Gorge TransLink partners from Clark, Skamania, and Klickitat Counties have combined efforts with their counterparts in Hood River, Sherman and Wasco Counties, Oregon to develop regionally based services into each others' service areas. They also have a shared marketing strategy and common branding for all of the vehicles in the five county area.
- People for People provides the Community Connector service between Prosser (Benton County), where there are connections to Ben Franklin Transit, and the Yakima Transit Station.

For the most part, regionally-based transit routes are designed to meet the needs of commuters, who may need to make long trips into a city (i.e. Seattle) from outlying areas. It should be noted that commuter services, such as those provided by Sound Transit, are specifically exempt from

complementary ADA paratransit requirements. Therefore, persons with disabilities who need to use paratransit for their commute trips may, in fact, be subject to more onerous travel patterns that require transfers from one system to another.

## Barriers to Coordination

Despite the numerous examples of local coordination efforts, untapped opportunities could result in even more meaningful coordination within the State of Washington. The following observations are offered to frame this discussion, and to better understand the barriers that prevent providers from operating their services in the most flexible manner, or from mixing and matching a variety of funding sources to deliver the most cost-effective services.

- **“Silo” Funding prevents coordination:** As documented in Chapter 2, the three largest funders of special needs transportation include public transit, ADA paratransit or other specialized demand-response systems, pupil transportation for homeless youth or for those requiring specialized education programs<sup>5</sup>, and programs funded through DSHS, most notably Medicaid. Together, these programs account for approximately \$279 million in estimated expenditures. These programs could benefit from more extensive coordination strategies. While staff from these various programs often participate on local coordination councils, the service operations continue to function by and large separately from each other.
- **No one-call center:** From the customer’s perspective, the system is fragmented and confusing. There is not a single point of entry for customers to call to find out about programs they may qualify for, or to arrange for transportation by making a single call.
- **Duplication of service:** From a program management perspective, there is duplication of service and redundant investment in infrastructure.
- **Lack of connectivity:** Connectivity remains a primary challenge for customers whose trips are regional in nature, but service systems operate within fixed boundaries that may not reflect these regional needs. This is especially true for persons who rely on paratransit.
- **Inconsistent coordination efforts at local level:** There is inconsistency in how local coordination councils operate, and in their effectiveness. Many do not have resources or full time staffing to carry out their coordination objectives, despite the best intentions and dedication of local members.
- **Pilot Projects don’t always advance:** Despite numerous promising pilot projects or innovative practices described earlier in this chapter, they have not been widely replicated or, as the case with Common Ground, have not reached a successful conclusion.

Through this study, project sponsors have sought to identify and better understand the barriers that are preventing coordination from occurring and, most importantly, to identify steps or remedies that could be taken to overcome these barriers. These barriers are described below.

### Lack of Statewide Policy Direction

Through SHB 1694, the Legislature documented its intent to promote coordination:

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<sup>5</sup> This study focuses on pupil transportation for students requiring transportation to special education facilities, and on transportation for homeless students.

*“It is the intent of the legislature that public transportation agencies, pupil transportation providers, private nonprofit transportation providers, and other public agencies sponsoring programs that require transportation services coordinate those transportation services. Through coordination of transportation services, programs will achieve increased efficiencies and will be able to provide more rides to a greater number of persons with special needs.”<sup>6</sup>*

However, ACCT, as the statewide coordinating council, is not empowered with the authority to establish or oversee legislative expectations. There are no clear incentives for agencies to participate in coordination objectives; nor are there repercussions if they do not.

### Funding and Program Eligibility Restrictions

Many programs sponsoring special needs transportation programs are required to restrict use of grant funds for a designated population; this, in turn, causes confusion for members of the public needing transportation and prevents program sponsors from sharing costs. As described in Chapter 2, some programs, for example, may sponsor transportation that is limited to veterans, or seniors, or homeless youth, or low-income farmworkers, because the use of funds is dedicated and therefore tied to those groups. Because funding is tied to providing transportation for a specific client group, jointly funding a coordinated system is made more difficult.

The two largest funders of special needs transportation, Medicaid and public transportation agencies, are each required by federal law to provide transportation services to Medicaid eligible persons and persons with disabilities, respectively. As illustrated below, the eligibility standards for these programs differ for persons entitled to receive the service as well as for the type of service they can receive.

**Figure 4-1 Medicaid and ADA Complementary Paratransit Eligibility Standards**

	Medicaid	ADA Paratransit
Basis for client eligibility	Low-income	Disability; unable to use fixed-route transit
Eligible type of trip	Medical only	No restriction as to type or number of trips
Service area	Any	Within ¾ mile of a fixed route
Time of day/days of week	Any	Same hours as fixed route
Customer fare	None	Twice the fixed route fare
Responsible entity	DSHS, through regional brokers	Public Transit Operators providing fixed route service

### Cumbersome Cost Sharing Methods

Social service agencies tend to fund or support transportation for their clients as an auxiliary service—as a means to support the end goal of providing a primary service such as training, medical assistance, etc. These agencies must ensure, often through cumbersome audit processes, that agency funds are being spent in support of eligible clients. While in theory some agencies have indicated support for mingling dollars and passengers through a single service delivery system, there is not a consistent methodology that is universally recognized and accepted by all ACCT partners and participating coalition members. Participants need to reach

<sup>6</sup> SHB 1694, Section 1

consensus on a statewide methodology for equitably sharing the cost of service among various client groups.

Even when such an agreement has been reached (as occurred through Common Ground), implementing it can be difficult without appropriate tools, such as a computerized program that can assign costs to multiple agencies.

### **Vehicle Specifications or other Vehicle Restrictions**

Some programs, by law, must adhere to specific vehicle design guidelines; school buses, for example, must meet certain specifications which are not necessarily practical for other customers. Likewise, public transit vehicles are required to be accessible for persons with disabilities, which is not the case with school buses.

Some funding sources limit or restrict the use of vehicles purchased with their funds to the clientele they serve. For example, FTA Section 5310 vehicles must be used primarily to deliver services for elderly and disabled, and are not intended for general public use. This makes it difficult, or impossible, for agencies to accept different client groups on their vehicles.

### **Insurance**

Insurance issues can have a significant impact on coordination efforts. For example, transporting non-agency clients and combining pupils and general public passengers is viewed as a greater insurance risk. Some agencies may be willing to share their vehicles when they are not being used, but are prevented from doing so due to liability concerns. Volunteer driver programs can be a very cost-effective way to provide services and often can provide a very personalized type of service to feel a specific need, but obtaining insurance for volunteer drivers using their own vehicles can be difficult and discouraging to potential volunteers.

### **Inconsistent Planning Requirements**

While coordination of special needs transportation is encouraged from the highest federal levels,<sup>7</sup> the Departments of Transportation, Health and Human Services, and the Department of Education are not subject to the same planning requirements although, arguably, the greatest opportunity for coordination is between among these agencies.

As indicated, three programs administered by the FTA, including the Job Access and Reverse Commute Program, New Freedom and the Formula Program for Elderly Individuals and Individuals with Disabilities are required to be derived from a locally developed, coordinated public transit-human services transportation plan. No comparable planning requirement exists for human service agencies—while they are encouraged to coordinate transportation program planning and funding, they are not required to do so, and, the provision of their funds is not tied to the demonstration of coordinated planning.

### **Inconsistent Reporting**

Client eligibility, recipient guidelines, accounting and reporting requirements and billing rates vary among state agencies and programs. This environment has led to barriers in designing unified transportation delivery systems, fully integrating transportation resources, achieving service

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<sup>7</sup> In February 2004, President Bush signed an Executive Order establishing an Interagency Transportation Coordinating Council on Access and Mobility to focus 10 federal agencies on the coordination agenda. It may be found at [www.whitehouse.gov/news/releases/2004/02/20040224-9.html](http://www.whitehouse.gov/news/releases/2004/02/20040224-9.html).



continuity from county to county, gaining consistency in reimbursement rates, and eliminating service gaps. Because it is not always considered a primary service, some agencies do not track the cost of providing transportation for their clients. For example, although the Department of Veterans Affairs directly provides transportation to and from three of its centers throughout the state, it does not itemize costs for transportation.

Likewise, agencies do not consistently track or even define service characteristics such as trips provided, hours of service, miles traveled, etc.

### **Lack of Shared Customer Information**

Coupled with the fact that agencies do not consistently report on transportation expenses or other service characteristics, is the problem that agencies maintain separate client databases. Because of confidentiality requirements, or the perception of such requirements, it is difficult for agencies to share client eligibility information in order to ascertain the extent to which there is overlap. Therefore, although it is assumed many ADA eligible persons may also be enrolled and eligible for Medicaid services, for example, or that customers from various agency-sponsored programs travel to the same locations and could travel on a common vehicle, these assumptions cannot be verified or quantified.

### **Unique Customer Needs**

By definition, customers of special needs transportation programs have difficulty making use--or cannot independently make use of--programs established for the general public. In many cases, these customers need a level of care that may not prove conducive to integration with other passengers. Some agencies have established service standards or guidelines for consideration in transporting their clients, such as maximum time on a vehicle, the need for a higher level of driver assistance, required use of seat belts, etc. that may preclude transporting them with other client groups.

Furthermore, there is often an inherent conflict between the philosophy guiding many human service agency programs that focus on developing a plan focused on meeting the individual's needs and, on the other hand, the need for transportation programs to focus on efficiency. Some agencies serving persons with developmental disabilities, or school districts required to transport homeless students, for example, develop service plans that is in the best interest of the client, which may not be conducive to goals established by transit agencies seeking to "group" trips in order to provide trips in a cost effective manner.

### **Contract Restrictions/Labor Agreements**

In some cases, transit agencies may be prevented from contracting out services because of limitations inherent in their labor agreements. For example, King County METRO is limited to dedicating no more than 3% of its total service hours to general public dial-a-ride services, currently provided under contract by Hopelink. (Hopelink also serves as the Medicaid broker for King County.) Likewise, most school districts own their own and operate their own vehicles, subject to local labor agreements. Significant revisions to current operating procedures would require amending these labor agreements.

### **Resistance to Change**

Resistance to change is difficult to quantify and, in part, based on perception and anecdotal evidence; however, arguably it is the most significant impediment preventing system changes

from occurring. In part, reluctance to change is based on fear that any shift in the status quo may actually result in increased costs to one participating entity or in loss of control and program oversight. In part, resistance to change is based on speculation of program outcomes or what *could* happen. For example, stakeholders involved in the Common Ground project expressed concern that implementing system changes, even on a limited basis, may result in significant impact to the current service delivery system, or that a change in the status quo could disrupt the base of service providers. However, since the project has not evolved from the planning phase, specific data has not been available to validate—or dispute-- those concerns.

## Chapter 5. Case Studies

As part of this project, the consultant team examined human service transportation delivery and related issues in more detail in four “case study” counties. These counties were Lincoln, Pierce, Snohomish and Yakima Counties, which were selected because they represent diverse geographic areas of the state, and also represent urban, suburban, small city and rural constituencies. The case studies allow for a more in-depth assessment of how services are funded at the local level, and about the range of providers that participate in that particular community. A summary of each case study is presented below; the more comprehensive case studies are included as Appendix E.

The case studies report on how coordination activities are conducted in those counties, and suggest key findings that may be relevant to similar counties. Stakeholder forums were convened in the four case study counties. The initial forums, held in Snohomish and Yakima Counties, focused on identification of transportation barriers faced by customers, as well as institutional barriers faced by service providers or funders. The second set of forums, convened in September 2008, focused on review and confirmation of key findings that were revealed through the study’s research, and discussion of strategies or solutions that would best address these barriers.<sup>1</sup> In general, the following conclusions or findings can be reached:

- Each county is unique, and has developed transportation solutions to address those specific characteristics. There is no one approach to meeting special transportation needs.
- In each county, the brokers providing service through the Medicaid NEMT program also deliver a wide range of other services and programs.
- Intercounty travel is needed by residents of all counties, especially to reach medical facilities.
- Each county, even the most urban, such as Pierce County, have rural areas that are difficult to serve because of distances traveled, terrain and limited services.
- Coordination efforts are the most advanced where there is dedicated staffing.

### Lincoln County

Lincoln County is among the most rural counties in the state. Fifty-five percent of the total population live in incorporated cities and another approximately 25% live in unincorporated areas. This means the balance of the county is very sparsely populated. With the land area so large, people must travel significant distances to reach even the most basic of services. A measure of its rural character can best be illustrated by the fact that it has no traffic signals despite being the seventh largest county in the state. The county has diverse mobility issues ranging from those with no mobility issues to those who are essentially isolated by their lack of ability to move from place to place. This makes the provision of special needs transportation service very challenging and expensive.

### Existing Transportation Services

- Within Lincoln County there is no agency that is dedicated to providing public transportation.

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<sup>1</sup> See Appendix C for more detail about the forums.

- Two transportation brokers provide some level of public transportation service under Rural Mobility Grants from WSDOT.
- People for People also provides a demand response service for seniors to senior nutrition sites, shopping and medical appointments.
- Access to medical services for people eligible for Medicaid is provided through a brokerage operated by Special Mobility Services (SMS).
- Paratransit trip volumes vary from 150 to 250 trips per month.
- Volunteers could play a larger role in some of the transportation services but recruiting and retaining volunteers has become very difficult in the past few years due to rising gas prices.
- Perhaps the largest, most comprehensive, and best-funded portion of the special needs transportation network in Lincoln County is provided by the County's eight school districts.
- In the 2004-05 school year, the eight districts received about \$1.7 million in state funds to conduct school transportation with some additional amounts for acquiring new vehicles.

## Transportation Needs in Lincoln County

The key transportation gaps listed below are directly from the most recently published coordination study of the region, prepared to meet federal SAFETEA-LU planning requirements. In addition, some new gaps are also listed.

- Older adults lack transportation for health care, shopping, nutrition, social services, banking, social events, religious services, and visitations with friends or family in health care facilities.
- Persons with disabilities lack access to employment, health care, social services, recreation and social events.
- Low-income individuals lack access to social services, health care, job search, education, and training opportunities. The working poor lack transportation for employment, shift-work, and taking children to child care.
- Youth lack transportation for after-school activities, summer activities, recreation, child care, alternative schools, and post-secondary education.
- Regional Trips – Many services are only available in neighboring counties and are often time-consuming for individuals.

## Coordination Activities

The requirements of SAFETEA-LU brought about a significant response to coordination within Lincoln County. The four counties in the QUADCO Planning group—Adams, Grant, Kittitas and Lincoln—all have very similar needs as all the counties are quite rural. Grant and Kittitas Counties do have larger cities in them, but outside of those cities, the counties are nearly indistinguishable from the perspective of population density and distance. Prior to SAFETEA-LU requirements the three county region of Adams, Grant and Lincoln had already been involved in coordinating transportation for special needs population largely through the efforts of People for People to cultivate support services for people who needed them. Kittitas County was added to the planning group as a member of the RTPO, but had not previously been involved in coordination efforts. With those driving forces, individuals established a coordination team and a

process. The initial effort was directed toward building an inventory of providers, transportation gaps, a snapshot of the special needs population and a plan to at least continue efforts many of which preceded the regional planning requirement.

### **Lincoln County Case Study Key Findings and Conclusions**

Providing transportation services in Lincoln County is inherently challenging due to its extremely rural and dispersed nature. There are no public transportation agencies operating within the county, although there are limited services provided by transportation brokers. The needs of older adults and persons with disabilities are met with a variety of paratransit services. Due to the county's size and rural quality, Lincoln County residents must often travel long distances to reach specialized services, shopping, etc., which are often located only in neighboring counties. Lincoln County participates in regional coordination efforts such as the QUADCO Planning Group, which includes Adams, Grant, Kittitas and Lincoln Counties. Further regional coordination may be necessary in order to provide enhanced interjurisdictional transportation, which is particularly important for Lincoln County residents.

## Pierce County

Pierce County is located in the southern area of the Puget Sound Region. It is one of the most populated counties in Washington, with the second highest countywide population (700,820 in 2000 Census) in the state. Tacoma has approximately 193,000 residents and is the third largest city in Washington State after Seattle and Spokane<sup>2</sup>. In contrast to the urbanized areas around Puget Sound, eastern Pierce County is a mix of rural communities and the sparsely populated Cascade Mountain foothills. In 2000, unincorporated areas of Pierce County accounted for 45 percent of county-wide population.

### **Existing Transportation Services**

- Over \$119 million is expended annually to provide transportation services to the general public and to special needs populations in Pierce County. Over 16 million trips were provided by the primary providers.
- Pierce Transit (PT) is the primary public transportation provider in Pierce County. PT offers: 50 local fixed-route bus lines; SHUTTLE complementary ADA paratransit service; a vanpool program; ridematching services; and intercounty express bus service.
- PT recently entered into an agreement with multiple neighboring counties to honor ADA transfers, eliminating the need for riders to pay a second fare.
- DSHS pays for transportation services for non-emergency medical visits for eligible individuals. Assistance is provided through Paratransit Services, the DSHS Regional Broker.
- Each of the 15 Pierce County school districts provides transportation services to students within their district boundaries. The districts primarily operate in-house transportation services for to/from school (including special needs) and extra curricular activities.
- A number of entities also provide transportation to the special needs population. These include public, private for-profit and non-profit agencies/companies.

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<sup>2</sup> Washington State Office of Financial Management

## Transportation Needs in Pierce County

Major findings from the Coordinated Public Transit-Human Services Transportation Plan and a needs assessment commissioned by the Pierce County Coordinated Transportation Coalition (PCCTC) are:

- Almost three-fourths of all survey respondents lived within three-fourths of a mile to regularly scheduled bus service (only half of those in unincorporated Pierce County did)
- Over three-fourths were unable to travel by themselves or purchase transportation because of a disability or health condition
- Just over one-half believed their usual form of transportation is convenient and reliable
- Only one quarter of respondents felt that it was easy to make connections with other transportation
- Two-thirds felt that medical appointments are hard to reach while one-half had difficulty getting to the grocery/drug store

Additional service gaps include: Service area limitations, lack of transportation options, eligibility requirements, cost of the trip, lack of information about options, and lack of travel assistance.

## Coordination Activities

The PCCTC was established in 1999 to develop and implement a plan for a more coordinated transportation system for all Pierce County residents. The coalition works to increase mobility and access for people who cannot transport themselves due to age, disability or income. The governing assembly makes policy for the PCCTC or advocates for policy changes with the members' parent organizations. The Steering Committee conducts the "day-to-day" work for the coalition. It is responsible for planning and carrying out the coalition's activities including the gathering and disseminating information to the special needs population and the community at-large. The Steering committee is comprised of staff from the major partners, larger transportation providers and social service organizations. The coalition is staffed Pierce County Community Services. It hired dedicated staff for the coalition in 2008.

## Pierce County Case Study Key Findings and Conclusions

Pierce County is primarily an urban county, but it also has significant rural portions. It is challenging to meet transportation needs of the general public, and especially older adults and people with disabilities, in the rural areas due to the limited transportation resources and a dispersed population in those areas. In the urban and suburban areas of the county, where Pierce Transit operates, the Shuttle complementary paratransit meets the needs of those who cannot travel via general public transit. The conditions in Pierce County point to a number of general findings, including:

- A formal coordinating body improves transportation options in the community by facilitating communications between providers and users of transportation services
- Coordinating activities should include the setting and implementing of goals that address community needs
- Dedicated staff helps facilitate the work of a coordinating body
- Meeting rural area needs requires greater innovation and level of coordination

- The broker/provider model provides flexibility and cost effectiveness in meeting infrequent and/or unique travel needs.

## Snohomish County

With over 600,000 residents, Snohomish County ranks as the third most populated county in Washington State, after King and Pierce Counties<sup>3</sup>. The county's population accounts for 10% of the statewide population and it is the sixth most densely populated county in the state. Everett is its county seat and the largest city with a population of approximately 90,000 residents<sup>4</sup>. The incorporated area accounts for 54% of the countywide population. Approximately two-thirds of the Snohomish County's workers live and work within the county. Approximately 63% of commuting trips occurred within the county<sup>5</sup>. The remaining 37% were out-of-county trips, and of those trips, 91 % were destined to King County.

### Existing Transportation Services

- Snohomish County is served by three public transit agencies: Sound Transit, Community Transit (CT) and Everett Transit, as well as the Washington State Ferries and Amtrak and Greyhound. The Transportation Assistance Program (TAP), a component of Snohomish Senior Services, also provides service for persons who live outside the primary service areas.
- The City of Everett is also home to Everett Station--a multi-modal, multi-use building that serves as a major transportation hub, a higher education and career development center and a gathering place for community events. Everett Transit, Community Transit, Sound Transit, Island Transit, Skagit Transit, Amtrak, and Greyhound connect at Everett Station
- Transportation for students is provided by 15 separate school districts. Transportation is provided both for basic transportation, and for special education trips, on behalf of those students whose disability or condition requires them to attend a specialized facility.
- Another important transportation program is that sponsored by the Department of Social and Health Services (DSHS) Medicaid program. In Snohomish County, Paratransit Services operates as the Medicaid transportation broker.
- A variety of other community- based or social service agencies provide specialized services to fill the gaps or provide specialized services not otherwise available.

### Transportation Needs in Snohomish County

- **Connectivity:** Transfers are often required and can inhibit their travel. Nearly 40% of people living in Snohomish County work in another county and need corridor-based service.
- **Limited service in rural areas:** For those living in more remote areas, transportation options are fewer and more difficult to access.
- **Lack of affordable housing:** Some people, especially those on limited incomes, cannot afford housing costs in the more urban parts of the county; therefore, they are re-locating in more remote areas where transportation services are limited.

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<sup>3</sup> Washington State Office of Financial Management

<sup>4</sup> Washington State Office of Financial Management

<sup>5</sup> 200 U.S. Census

- Lack of service for veterans: This is an emerging issue that has been raised in several counties. With more and more veterans returning from active service, additional programs and resources are needed to treat or care for veterans.
- Need for improved access to customer information: Often, there is confusion among members of the public regarding eligibility, application procedures, and trip planning.

## Coordination Activities

With support from the Agency Council on Coordinated Transportation, the Snohomish County Transportation Coalition (SNOTRAC) first convened in January 2000. Coalition members conducted a survey sent to 1,400 agencies and providers to determine transportation modes, routes, and service delivery models. Coalition members focus on coordinating existing transportation modes to serve the developmentally disabled, the mentally ill, children and the elderly. In June of 2002, SNOTRAC hired a consultant to help develop a decision-making structure, complete the transportation inventory, develop a strategic plan, and create an implementation and evaluation plan. SNOTRAC adopted a five year strategic plan (currently in the process of being updated) that included the following goals. The group meets monthly and considers a range of topics to promote coordination among public and private providers, and to educate and encourage collaboration among various transportation partners.

## Snohomish County Case Study Key Findings and Conclusions

Snohomish County is considered to be a suburban county with many of its residents traveling regularly to Seattle or elsewhere in King County for work, school or medical purposes. As such, this case study may be considered most relevant for other counties that are economically linked with nearby urban or employment centers, such as Tacoma, Olympia or Portland, OR. Transit providers in Snohomish County are faced with the need to balance demand for commuter-based services, primarily along the I-5 corridor, with the need to reach more remote communities, or to provide mid-day or late-night service for transit dependent persons. Compared to other counties, Snohomish is more affluent as indicated by lower poverty rates, higher levels of car ownership, and lower levels of families or individuals relying on public assistance.

## Yakima County

Yakima County, located east of the Cascade Mountain range in Central Washington, comprises a geographic area of 4,296 square miles. It is the second largest and eighth most populated county among the state's thirty-nine counties<sup>6</sup>. The city of Yakima is located in the northern part of Yakima County and is the county seat. It is the largest city, with approximately 72,000 residents and accounts for 32% of the county's population. Sunnyside, with a population of 14,000 residents, is the second largest and the only other city with over 10,000 residents. The southern portion of the county is less densely populated and mostly consists of the Yakama Indian Reservation. The reservation is primarily agricultural land with range and grazing land. Yakima County ranks as the second highest in total values of agricultural and livestock products produced, after Grant County<sup>7</sup>.

<sup>6</sup> Office of Financial Management, Population and Components of Population Change by County: April 1, 2000 to April 1, 2008, Release date: June 30, 2008.

<sup>7</sup> Washington State Department of Agriculture, Agriculture – Washington's NO.1 Employer: Retrieved on July 21, 2008 from <http://agr.wa.gov/AboutWSDA/>.



## Existing Services

- Yakima Transit (YT) is the only public transit system in Yakima County. YT operates fixed-route service, complementary paratransit services, and a vanpool program.
- YT contracts with Access Paratransit and People for People to provide paratransit service for persons with disabilities. Complementary paratransit service is available seven days a week.
- YT also provides vanpool service to Benton and Yakima counties. There are 22 vans in revenue service, which were provided by Washington State's Vanpool Investment Program.
- Each of the 14 Yakima County school districts provides transportation services to students within their district boundaries. All districts in the county operate the transportation services in-house with vehicles owned by the district.
- People for People (PfP) is a private non-profit agency that acts as the Medicaid broker for Yakima County as well as Grant, Adams and Lincoln Counties. PfP acts as the 211 service provider. It directly provides the following transportation services: paratransit service, the Community Connector, Medicaid Transportation, a route for the Yakama Nation, job-access (JARC) transportation, and senior transportation.

## Transportation Needs and Barriers in Yakima County

A number of transportation needs or barriers have been identified specific to Yakima County:

- Duplication of transportation resources: Transportation providers operate with local, state, and federal funding which is oriented to specific eligibility criteria for the person and ride purpose. There is a reluctance to integrate resources because of perceived risk, liability, and funding restrictions. This approach results in duplication of equipment and drivers.
- Older adults need transportation to medical appointments, senior meal programs, shopping, personal visits, and for community events that include spiritual, social, recreation, and cultural events. Those who live outside the Yakima Transit service area in rural locations are often isolated from services.
- Individuals with disabilities need transportation to jobs and training opportunities in their communities. Washington State Division of Developmental Disabilities has implemented the "Working Age Adult Policy." to assist adults with disabilities to enter the workforce. In order to maintain independence and mobility, transportation is needed to access health care, shopping, recreation, and social services.
- Youth need transportation to access educational opportunities, employment, and social services. Transportation is needed to participate in after-school activities (a particular challenge for those in rural locations) and to access post-secondary education.
- Low-income individuals identified the need for transportation to access employment, training, education, child care, job search, social services, and health care. Agricultural work requires dependable transportation to access employment in the rural areas of the county.

## Coordination Activities

The Yakima County Special Needs Transportation Coalition works with community service providers to address transportation barriers for the special needs community to access services,

employment opportunities, and daily activities. The Special Needs Coalition's goal is to improve transportation effectiveness and efficiency throughout Yakima County by collaboration. PFP coordinates the Special Needs Coalition, providing leadership to facilitate and host the meetings. Since it was formed in 1998, there has been some limited funding that has helped to support the facilitation through ACCT; however, PFP currently does not receive funding for its facilitation. The Yakima County Special Needs Coalition provides a forum for agencies to discuss coordination of services, how to meet the needs of clients who fall under the special needs category and update each other on current projects. The coalition was instrumental in preparing the coordinated plan and hosted community forums and distributed surveys. The coalition was successful in providing the foundation for identifying transportation needs on the Yakama Nation Reservation and for securing FTA funding to implement the Yakama Nation Tribal Transit project.

### **Yakima County Case Study Key Findings and Conclusions**

Yakima County's rural nature is enhanced by the fact that it is surrounded by other rural counties. Yakima Transit serves the city of Yakima, but provides only limited service outside of the city. Those who live outside of the city are often isolated and have difficulty accessing specialized medical services, shopping, and educational opportunities that are located in the city of Yakima and beyond due to limited transportation options. Special needs passengers were also found to have problems understanding and accessing existing services. Yakima County has an active Special Needs Coalition, which promotes transportation coordination throughout the county.

Previous coordination efforts resulted in the county's coordinated plan and a partnership between the Yakama Tribe and Yakima Transit. The county could benefit from additional coordination efforts to addressing unmet transportation needs, especially in the rural areas. However, the Special Needs Coalition is limited by the fact that it does not receive funding for its facilitation. In addition, funding requirements at the state level make it more difficult for a county like Yakima to access resources than for more urban counties. Therefore, enhanced coordination at the state and local levels would help to address these coordination issues.

# Chapter 6. Human Service Facility Siting: Issues Affecting Proximity to Transit

## Overview

The report so far has discussed populations using special needs transportation, and transportation service providers. This chapter focuses on the most frequent origins and destinations of special needs transportation trips, human services facilities: assisted living facilities for seniors and persons with disabilities, hospitals and medical clinics, drug and alcohol rehabilitation clinics, vocational rehabilitation, and job training/employment services facilities. It describes the extent to which transit proximity is considered when siting human service facilities and discusses factors that potentially present obstacles to coordination, for both public and private sector facilities. More than thirty-five staff of state and local public agencies, as well as at key non-profit organizations, were interviewed for this evaluation.

It seeks to address the following questions:

- Are human service facilities conveniently located near existing transit services?
- Which human service facilities are poorly placed with respect to transit?
- What state and local policies influence siting decisions?
- How are social service facility site decisions made?
- When is transportation considered in the siting process?
- What social service agency policies and procedures affect siting decisions? To what extent are they successful?

A case study is presented to illustrate “real life issues” related to coordinating social service facilities near existing transit services. The final section considers barriers to and opportunities for influencing the human services facility siting process.

## Purpose of the Evaluation

The purpose of this evaluation is to explore what factors currently affect whether human service facilities are sited with good access to transit and to identify ways in which better siting decisions could be made in the future. The mismatch between human services facilities and existing transit services can have economic, social, and environmental implications:

**Economic:** Those living below the poverty line cannot easily afford a private automobile and are at a severe disadvantage in reaching job opportunities, skills training programs, and affordable housing if they cannot utilize public transit services.

**Social:** Human services facilities aren't as effective at reaching their target population if they aren't located near public transit. Persons who are transit-dependent have difficulty in accessing some locations or cannot get there at all. Those needing essential services are pushed from fixed-route public transit onto more costly paratransit services, forced to rely on others for rides.

**Environmental:** Locating human service facilities or low-income housing where there is limited or no transit services increases vehicle miles traveled and can ultimately contribute to poorer air quality and greenhouse gas emissions.

Location decisions represent long-term investments. Once the location decision has been made, transit operators may be put in the difficult position of needing to re-align service or make a decision not to provide service at all due to lack of resources. There are many factors that affect facility siting decisions, including local real estate trends, market forces, facility needs, zoning requirements, existing legislation, and funding constraints. These factors will be discussed more at length in subsequent sections.

Ultimately, the location of a human service facility affects how many and how well a target population may be served. Those planning facility siting for public agencies may be faced with a trade-off when deciding how to allocate public resources most efficiently. To stretch a capital budget, locations on the edge of urban areas may be more attractive because the cost of land is lower. A larger clinic or more housing units may be provided, thus seeming to serve more clients. Locations with excellent transit service may be more expensive, yet serve the same number of clients simply because it is more accessible. The added value of ancillary services like transit is difficult to quantify in capital budgets, but often shows up in operating costs as transportation services are required.

## Types of Human Services Facilities

The public sector is responsible for the policy framework and regulatory process by which all human services facilities in Washington are developed. However, human services are provided by both public and private sector service providers, at facilities that may be publicly or privately owned, including:

- Public sector facilities
- Private sector facilities requiring a state license or using public funding sources
- Private sector facilities

Policies guiding the location of these three types of human services facilities are explored in this chapter.

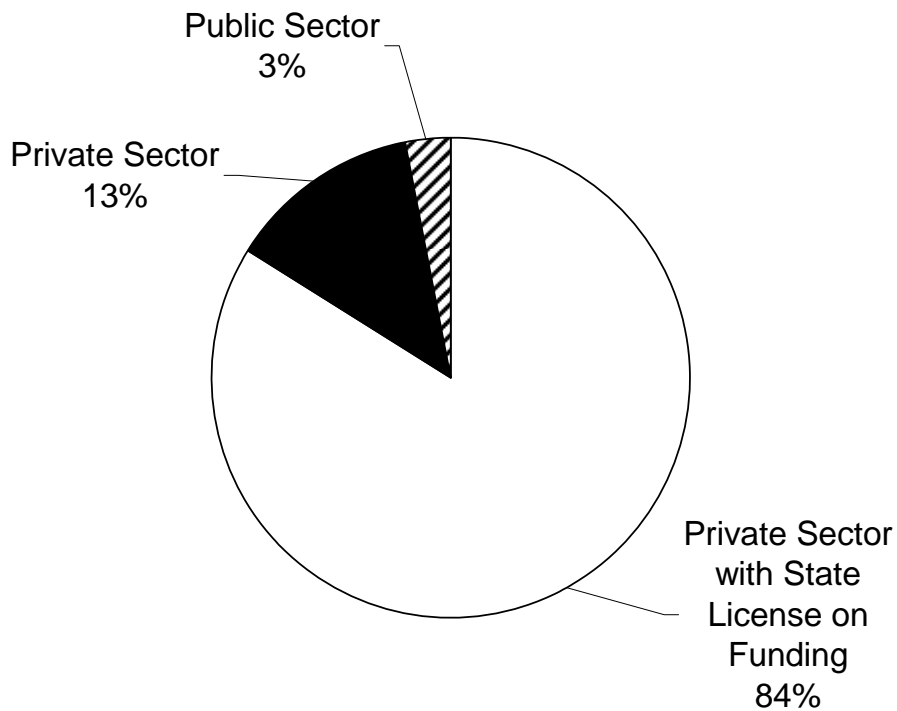
The process of siting a human services facility is similar for all providers, but more highly regulated depending on the degree of public sector involvement. For example, some nursing homes for senior citizens are state-owned, some are owned by non-profit organizations, and some by for-profit corporations. Even though they are the same type of facility, the location constraints for a state-owned nursing home are different than those of a privately-owned one due to additional regulations guiding the siting of public sector facilities. In most cases, these additional constraints result in the selection of more transit-friendly sites.

Figure 6-1 outlines the three types of human services providers and the facilities they operate. It should be noted that it provides approximate numbers in order to gauge the order of magnitude for each and does not contain a complete inventory. Figure 6-2 illustrates the percentage of total human service facilities that each sector represents.

**Figure 6-1 Three Types of Human Services Providers**

Type of Service Provider	Examples of Human Services Facilities	Number of Facilities Statewide <sup>1</sup>
Public sector – state, county, city	Public health and employment services facilities, including Community Service Offices, Work Source Centers, County health clinics, hospitals	DSHS: 200 County health departments: 35
Private sector, state licensed or state funded (corporations and non-profit organizations)	Hospitals, medical clinics, senior assisted care, affordable housing dialysis clinics, drug and alcohol rehabilitation clinics	Adult family homes: 2,600 Boarding homes: 550 Nursing homes: 245 Affordable housing: 3,000
Private sector (corporations and non-profit organizations)	Retirement communities	Continuing care retirement communities (CCRC's): over 300 Independent living/active lifestyle communities for 55+: over 300

**Figure 6-2 Human Services Facilities**



## State Procedures for Facility Siting

State owned or leased facilities represent the smallest number of human services facilities, but they serve the largest client bases, meaning accessibility is key. The siting of these facilities is highly regulated and guided by internal departmental policies as well as state policy and local zoning codes. In general, state facility siting decisions are reviewed for proximity to public transit,

<sup>1</sup> This does not represent a complete inventory of these types of facilities in Washington. These numbers are approximate estimations and were gathered from interviews with state administrative staff, agency websites and retirement housing industry websites.

and it is unusual that a building or lease would be acquired where there is no transit service. Where this is the case, there is typically no transit service in the area. Site selection decisions are initiated by requests from individual state agencies, and implemented by the General Administration.

## General Administration

Washington State's General Administration (GA) has the statutory authority to acquire, lease, purchase, and dispose of real estate on behalf of all state agencies<sup>2</sup>. Facility site priorities are determined by the agency requesting a new location, including preferred geographic area, location factors, office space requirements, and parking needs. Generally, an agency providing social services includes access to and adjacency to public transit as one of its site requirements. If more parking spaces are requested than are allowed in the local zoning code, an exemption must be granted before additional parking can be leased.

Once the application is approved, GA's Real Estate Services begins to locate candidate facilities and assessing their feasibility<sup>3</sup>. When all submittals have been received from owners, developers or agents, a site selection team is responsible for rating proposed sites and choosing the most appropriate one. Although proximity to transit is one of the criteria rated during site selection, it is one of many factors that must be considered, and not a determining factor. The vast majority of state agencies are located in leased properties<sup>4</sup>.

## Department of Social and Health Services (DSHS)

DSHS provides a variety of services to meet the needs of its clients, including food assistance, financial aid, medical care, vocational rehabilitation, drug and alcohol treatment programs and many others. It serves one fourth of Washington residents, which is approximately 2.1 million clients, including children, families, vulnerable adults, and older adults. For this reason, DSHS is the most important social service agency with respect to siting decisions due to its volume of services. The location of DSHS facilities is important because many DSHS clients have to go into the local offices to meet with caseworkers, apply for eligibility, or to receive their benefits. Many of the clients are low-income and may not be able to drive, and may be transit dependent. There are approximately 200 facilities statewide: 180 leased and 20 owned by the state<sup>5</sup>.

DSHS has established policies and procedures to ensure that facilities are well-sited with respect to transit. In addition to other supportive legislation, DSHS policies promote the coordination of facility siting with existing transit service. This ensures that all newly leased or built facilities consider transit proximity as a key location factor. DSHS Administrative Policy 8.09 was adopted on July 1, 2001 in response to RCW, Chapter 47.06B.010 which requires state agencies to coordinate transportation services. DSHS Policy 8.09 requires that all DSHS administrations adopt individual policies to ensure that transportation services paid for by DSHS agencies are coordinated for persons with special transportation needs.

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<sup>2</sup> Exceptions include four-year universities, the Department of Transportation, the Department of Fish and Wildlife, the Department of Natural Resources, the State Parks and Recreation Commission, and the Liquor Control Board. Source: House Bill Report (SHB 2366)

<sup>3</sup> This process is described in further detail in Appendix H.

<sup>4</sup> Interview with Ron Wall, General Administration, July 31, 2008. "Approximately 99.9% of state facilities are located in leased office space".

<sup>5</sup> A map with the location of DSHS facilities statewide is included in Appendix H.

## Washington State Employment Security Department (ESD)

The ESD is a state administration which provides services directly to local residents. It maintains approximately 70 leased sites around the state which provide a variety of employment-related services. Nearly half (38) of these are Work Source job training and placement centers, twelve of which are co-located with district tax offices and many others with DSHS Division of Vocational Rehabilitation (DVR) facilities. Sites are primarily selected based on the access needs of clients. Typically only one or two “new” site location decisions are made in a given year. Because Work Source and DVR sites often co-locate, ESD leasing staff follow the more stringent DVR site selection criteria when evaluating potential locations. A field inspection is made before a lease is signed, to ensure, among other criteria, that a potential new facility is located within 100 yards and “line of sight” of a transit stop.

## Washington State Department of Health (DOH)

The DOH manages a limited number of facilities directly, namely a large central staff in state-owned buildings. Services are provided to residents via county-managed local health facilities. There are 35 local health jurisdictions, with site selection decisions made according to the priorities of each county where they are located. More importantly, the DOH is responsible for licensing many types of health care facilities, private and public, where human services are provided. There are approximately 2,600 adult family homes, 550 boarding homes, and 250 nursing homes licensed in Washington. Location decisions for these facilities are guided almost entirely by local zoning code.

## Siting of Private Sector Facilities Utilizing State Funding or State License

Facilities which require a state license to operate, or which make use of public funding sources, face more location guidelines than those which do not. This type of facility represents the bulk of human services providers in Washington, as shown in Figure 1.

Affordable housing developments are one facility type that could potentially be influenced through a change in eligibility criteria for public funding. The state Housing Trust Fund has provided financing assistance to approximately half of the estimated 3,000 affordable housing developments in the state. Proximity to transit is not a requirement for Housing Trust Fund eligibility. However, applications for grants are evaluated for proximity to public transportation and social service facilities. Thus, if an application is made by an affordable housing developer for a location that is outside of the transit service area, it will not be very competitive in this process, and is not likely to be awarded funds.

Certain human services facilities require a license in order to operate. Mainly these are assisted care living facilities for seniors: nursing homes, boarding homes and adult family homes. Currently, licensing is often the last step in the development process for these facilities. However, there is one example of a licensing process that considers proximity to transit: the Certificate of Need (CoN) study. Hospitals, nursing homes, and medical clinics such as dialysis clinics must obtain a CoN before acquiring a site and applying for an operating license. The CoN study looks at market factors for health care services, such as growth in demand and the condition of competing facilities, and several potential sites may be considered. This consists of a six-month economic analysis and public hearings. All relevant stakeholders, including public transit providers, are invited to participate. The CoN is granted for a particular site, and may be granted conditionally based upon transportation mitigation measures. In areas of the state where

fixed-route transit service is available, the transit operator is involved early in the process, and a transit-friendly location is always required. Thus the CoN represents a process by which human services facility locations are evaluated and influenced with consideration to transit.

Health care facilities which do not require a state license have only the site location restrictions imposed by local zoning code. For instance, the site plan for an HMO or other private clinic is reviewed for ADA and SEPA compliance, but if it is a “by right” location, no context factors such as accessibility to public transportation are reviewed. The public has little ability to influence the site selection criteria of such private actors other than local zoning code, or if the facility uses public funds. Funding from federal and state sources can set eligibility criteria which constrain how the funds are used; location is sometimes such a criterion.

There are some private facilities providing health services for seniors which fall through a licensing “loophole,” that is, a license is not required to operate. These private senior assisted living facilities may accept residents who are capable of using transit when they move in, but who require more care or become non-ambulatory as they age. While Medicare provides payments to state-licensed nursing homes on a per square foot basis, such unlicensed facilities are eligible on a per-room basis. Thus residents are able to “age in place”, but become increasingly dependent on paratransit services.

## **Private Sector Facility Siting**

Some human services facilities neither require a state license to operate nor do they use public funding, and their decisions are largely guided by market forces. This pertains mainly to market-rate housing for senior citizens. Known as retirement communities, independent living centers, or continuing care facilities, these private sector housing developments are designed for seniors who are largely independent and care for themselves. Most residents are mobile and deal with their own health care and other needs off-site. Such a facility faces no more development review or location constraints than any other private-sector, multi-family development without age restrictions. This means that access to public transportation may be taken into account by the facility developer, but it will not be a subject of public review.

This evaluation found that although a significant portion of the state population aged over 55 lives in these communities, there is no state oversight. It is unknown how many retirement communities exist in Washington, where they are located, the number of units within them, and number of residents. An estimate was made using an industry website aimed at potential residents, which listed over 1,000 independent living and continuing care retirement communities to choose from.

It is unclear whether the location of these retirement communities is a public policy problem. Residents may not face mobility limitations when they move in, but become more dependent on transportation services as they age. An isolated site may leave residents increasingly stranded as they age, or make them difficult to serve as they become eligible for paratransit or other social services. This segment of senior housing services deserves further study.



## Factors Influencing Siting Decisions

Some of the most significant influences on site selection for a human services facility are market factors faced by anyone seeking to build or lease a building, including:

- Cost of land / rent
- Size and quality of leased space
- Size of parcel, parking and vehicle storage requirements
- Access to major roads

In all real estate transactions, “time is of the essence” due to rapidly changing events surrounding the process (old leases have expiration dates, financial institutions have deadlines that must be met, construction must be completed prior to occupancy, etc.). Tight timeframes can often force imperfect decisions in any situation.

Most human services facilities are filling market gaps; that is, they are providing services for people with special needs that not met by normal market services. Thus, they tend to face additional regulatory or funding constraints that also influence siting decisions. They tend to utilize public sources of funding or have some other form of public sector oversight, such as a licensing process. They also may face more regulation as to where they are permitted by local zoning code. Facilities operated by public agencies also follow internal agency policies.

This section describes the primary policy and regulatory tools that influence human services facility location decisions. Figure 6-3 contains a summary.

**Figure 6-3 Regulations Guiding Facility Siting for Human Service Providers**

	Policy	Service Providers Affected		
		Private Sector	Private Sector, state licensed or using public funds	Public Sector
Local	Local Zoning Codes	X	X	X
	Transit Oriented Development (TOD) Incentives	X	X	X
State	State Environmental Policy Act (SEPA)	X	X	X
	Growth Management Act (GMA)	X	X	X
	Co-Location Directive			X
	General Administration site selection criteria			X
	Housing Trust Fund eligibility criteria		X	
	Certificate of Need study		X	

## **Local Zoning Codes**

The primary factor in site selection is finding a land parcel where the intended use is allowed. Local governments (e.g. city and county) influence various land use decisions within their jurisdictions. Local zoning codes regulate land use, residential density, parking, and types of commercial services. The parcel must be large enough to accommodate not only the necessary buildings, but also the parking spaces required by the zoning code. A major siting obstacle can be high minimum parking requirements in a local zoning code, which can make siting a facility in a transit-friendly downtown location unaffordable or impractical.

## **Transit Oriented Development (TOD) Incentives**

Some local governments, most notably the City of Seattle, have developed incentive programs to focus new development along high-capacity transit corridors and nodes (light rail and commuter rail stations, bus transfer hubs, and park-and-ride lots). Such incentive programs provide funding, permitting, or density bonus incentives to developments within a zoned overlay around these transit facilities. This is especially effective at making transit-friendly sites feasible for non-profit organizations developing housing and clinics for low-income clients.

## **State Environmental Policy Act (SEPA)**

All new land use development is reviewed for SEPA compliance. Each city and county permitting authority in the state has a SEPA-responsible official who issues a decision and can set mitigating conditions. These can include coordination with a public transit provider before a permit is issued. Over time, transit-related mitigations have become more specific, such as directing an applicant to provide customized shuttle service, or an on-site transit facility. Since mitigation measures are tailored for each individual development, it is difficult to influence a location decision based on client access.

## **Growth Management Act (GMA)**

The Growth Management Act (GMA) requires communities to encourage urban density, avoid sprawl, and consider urban planning approaches to promoting physical activity. Locating state facilities within designated higher density centers and corridors encourages active modes of commuting and allows more employees to walk or bicycle to adjacent services. (RCW 36.70A)

## **Co-Location Directive**

It is the policy of the state to encourage co-location and consolidation of state services into single or adjacent facilities. (RCW 43.82.010 and Executive Order 80-17).

## **General Administration (GA) Site Selection Criteria**

In addition to abiding by local zoning codes and the federal American with Disabilities Act, GA has developed the following Leased Space Requirements. 1) Lease rate: typically higher in central city locations where transit is more accessible. 2) Parking: the number and location of parking spaces, as well as ADA accessibility. Adequate parking in central city locations can be difficult due to cost and availability. Facilities with greater parking requirements tend to locate on a city's periphery. 3) Building efficiency and suitability: suitability for program operations. The facility must be flexible and large enough to accommodate the specified needs of the requesting agency over the lease period. In addition, sustainability and "green building" elements (for example, energy and water conservation and efficiency, and public transit) must be considered. 4) Accessibility to public transportation: always considered, although typically not discussed in

detail until a site is already selected. 5) Transportation access: accessibility to major routes of travel, ingress and egress, and proximity to clients and program needs.

## Housing Trust Fund Eligibility Criteria

Administered by the Community, Trade and Economic Development (CTED) department, the state's Housing Trust Fund is an important source of funding for developers of affordable housing for seniors and low-income workers. Such developers, mainly local housing authorities and non-profit organizations, compete for grants through a competitive application process. Grants are evaluated and ranked according to compliance with a number of criteria, including access to public transportation.

## Certificate of Need Study

Before a new nursing home or hospital facility is approved for development, DSHS approve it by granting a Certificate of Need (CoN). The CoN requires the applicant to look at market factors for health care services, such as growth in demand and the condition of competing facilities. Several potential sites for a new facility may be considered. Relevant stakeholders, including public transit providers, are invited to the table as part of this process. The CoN is granted for a particular site, and may granted be conditionally based upon transportation mitigation measures.

## Case Study

This section presents a siting case study in Wenatchee, Washington for the purpose of highlighting “real life” issues that affect facility siting decisions made by Washington State public agencies. DSHS policies and state legislation ensure that a baseline of transit accessibility is met whenever possible. However, the complexity of the facility siting process may require that an ideal location, with respect to transit, be compromised. This case study investigates some of those obstacles.

DSHS facilities in Wenatchee are located in different parts of the city, which causes some difficulty for clients needing services from more than one division. The DSHS Region 1 Leased Facilities Strategic Plan<sup>6</sup> stated that lining up all of the Wenatchee leases to prepare for a DSHS co-location at a new site beginning November 1, 2008 was a primary objective. In addition to co-location, DSHS also wanted to upgrade its facilities. This option supported both service integration and co-location opportunities.

Due to geographic limitations in the Wenatchee Valley, there are not a lot of developable sites available for new facilities. Furthermore, there are few downtown locations where there is enough developable land to accommodate the co-location of DSHS agencies. Where there are possibilities, the land is normally harder to develop and results in a higher cost per square foot.

During 2005, DSHS considered a joint development project with LINK Transit that would co-locate DSHS facilities at the Columbia Station, a LINK Transit-operated regional intermodal facility, as well as the Employment Security Department, and the Skill Source Offices. This “One-Stop” facility would be developed by LINK Transit or a private developer and leased by DSHS.

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<sup>6</sup> Region 1 Leased Facilities Strategic Plan, Department of Social and Health Services, January 2006. (First approved in March 2005).

The proposed development was particularly well-suited with respect to transit access as it is a transfer center for Link Transit buses with connections to intercity buses (Northwest Trailways), Amtrak service, taxicabs, and bicycle options. The station and parking are owned by LINK Transit, the regional transit agency. Seven routes serve the area and provide local and regional connections. There was land at the transit center where new facilities could be developed. The proposed development included approximately 75,000 sf: DSHS (47,391 sf), Employment Security (11,199 sf), and Skill Source (16,000 sf). It would have accommodated between 146 and 167 employees, and cost approximately \$23 Million.

Despite the many potential benefits of locating at Columbia Station, the project did not move forward and DSHS has postponed co-locating with other agencies for the following reasons:

**The lease rate was higher than market rate.** The proposed lease rate was initially more than \$10 more per square foot than the market rate. The cost was higher than a stand-alone site because the plan had to work with constrained and challenging topography. This is typical of downtown sites because there is often a shortage of larger developable sites in the central city that don't require environmental remediation or have topographical, parking or zoning constraints. These characteristics tend to drive up the price which ultimately affects the lease rate.

**The lease term was longer than typically permitted by GA.** In order to account for the more expensive development, the term lease would have to be at least 20 years to amortize the cost of the development. Since SHB 2366 prohibits 20-year leases, they need to be approved by the legislature and are exceedingly rare. GA typically does not enter into leases longer than 5 years because they have found that longer leases may result in poor maintenance and service from property owners. Shorter leases are also more flexible and can accommodate changing social, economic and political conditions, which affect program funding levels.

**DSHS determined that there was not adequate parking.** The proposed project included the cost for the minimum number of spaces required by local zoning codes. This included underground on-site parking and a shared parking facility in an adjacent lot. Although the site met minimum parking requirements, local DSHS planners were discouraged by the quality of the parking and were not confident that the shared arrangement would reliably provide adequate parking.

**Lease terms made it difficult to efficiently consolidate co-located facilities.** Co-locating various DSHS administrations and other agencies is challenging for numerous reasons. In particular, lining up the lease terms for the various agencies is difficult and could not all be done at the same time. The Area 1 Leased Facilities Strategic Plan suggested renewing the 5-year leases with cancellation clauses, to avoid paying for vacant space. However, the short-term leases are often considerably more expensive.

**Maintaining status quo with existing landlord was less controversial.** A proposed move can result in challenging dynamics with building owners who may exert political pressure to prevent the relocation. This was the case in Wenatchee, where the building owner of the existing DSHS facility endeavored to keep them from moving.

## Findings

Private sector facilities were found to have the fewest site location constraints, and are least likely to consider access to public transportation in the siting process. There is opportunity to influence

siting decisions by these service providers through the development review process, and through incentives.

Private sector facilities utilizing public funds or a state license are more likely to serve transit-dependent clients. The bulk of the human services facilities considered in this study fall into this category. There is opportunity to influence location decisions by these providers through state funding eligibility requirements and the state licensing process.

Public sector state and local staff who were contacted for this study did not consider locating public sector facilities near transit to be a significant problem in Washington. This is likely because most public agencies have established policies and procedures to ensure that access to public transportation is taken into account when siting a human services facility. However, many factors must be considered when siting a new facility, including price, building efficiency, suitability for program operations, parking, etc. The number of viable siting options is typically limited, and compromises need to be made. Also there may be conflicting expectations and opinions between a local program (that will occupy the selected site) and the agency headquarters about the most important siting factors.

The findings of this evaluation are summarized in Figure 6-4.

Figure 6-4 Summary of Findings

	Findings
Private Sector / All	<b>Parking requirements limit potential sites and drive up capital costs.</b> Local governments usually follow conventional parking standards which assume the car ownership and use rates of middle-income suburban areas. Clients and residents of human services facilities tend to have lower rates of car ownership and higher transit and paratransit dependency than the general population. Parking helps determine the size of land parcel, and thus cost, and thus excessive parking requirements increase development costs.
	<b>Availability and cost of appropriate sites for new development.</b> There are limited downtown locations that meet the size needs of co-located and larger agencies. Downtown locations proximate to high-quality transit are more expensive.
	<b>Sometimes there is limited transit service.</b> Rural areas typically have limited transit service even in downtown locations, so it may be difficult or impossible to locate a facility near transit service.
	<b>High land values in transit-rich downtown areas.</b> The cost of land is a key factor in site location choice. Land prices are particularly an obstacle for non-profit organizations siting facilities serving low-income clients and residents. They tend to drive new affordable housing and health clinics to the edges of urban areas, where transit service is not as good as in central areas.
Private Sector, State Funded / Licensed	<b>Development review “loophole” for unlicensed, market-rate service providers.</b> Facilities that do not make use of public funds, or require a state license to operate, are not subject to any formal coordination with transit services at all. Nor is access to transit a “checklist” item for local planning staff reviewing development plans and issuing permits.
	<b>Facilities review for state permits happens after site acquisition.</b> Currently, private sector facilities which require a state license are not reviewed until the site plan is fully developed.
	<b>Vague standards in Housing Trust Fund grant eligibility requirements.</b> While access to transit is a criterion for Housing Trust Fund grants, it is merely “easy access to public transportation.” This vague guideline can lead to a range of outcomes not necessarily meeting mobility needs of senior clients, who may be inadequately served by what is considered “easy access” for the able-bodied.
	<b>Level of transit service may not be considered.</b> Locating near a bus stop is usually considered by public sector human service providers; however, the level of service at that stop may not be. Frequency of service is key to accessibility.
Public Sector	<b>State agency request to GA does not specify proximity to transit.</b> GA should require state agencies to clearly spell out their transit proximity needs in terms of distance to the nearest bus stop and frequency of service.
	<b>Proximity to transit may not be weighted heavily enough among other factors.</b> Even if proximity to transit is considered a key factor in the siting decision, it may not be weighted as heavily as other factors.
	<b>Office of Financial Management oversight may lead to slower siting process.</b> SHB House Bill 2433 adds additional steps to the facility siting process to involve OFM. Although SHB 2433 was instituted to promote efficiency, it conversely lengthens the process. This may make it more difficult to secure a competitive lease rate due to a less flexible and longer timeframe.
	<b>GA must consider the potential site as it is currently.</b> If a site has poor transit proximity, GA does not enter into discussions with the transit provider to increase or enhance service so that it would influence the site selection.

## Chapter 7. Best Practices

Best practices or model programs from other states are examined in this chapter. These programs were selected for inclusion here either because they have resulted in sustained, long-term implementation of local/regional coordination and/or because they offer some additional perspectives or models that have respectively generated local coordination in their own right. The best practice examples identified in this chapter are categorized with respect to:

- State-level Coordinating Councils
- Organization of Local Coordination Efforts
- Local Service Delivery Coordination Models
- Best Practices in Medicaid Transportation

The ultimate purpose of this chapter is to better understand coordination models adopted by other states and to identify strategies, programs and practices that could potentially improve coordination in Washington. The unique characteristics of each program are described below, with “lessons learned” summarized.

### State-level Coordinating Councils

As of 2004, at least 38 states had established state-level inter-agency councils or advisory committees focusing on the coordination of community transportation services, while 25 states (some of them overlapping with the 38 states above) had either established Memoranda of Understanding (MOUs) or informal agreement between the State Departments of Transportation and the State Department of Human Services. In addition, 19 of those 38 states had also established statutes or legislation requiring some level of coordination of community transportation services.<sup>1</sup> In this section, the composition and success of state-level coordinating councils from four states are examined. These states include Florida, Iowa, North Carolina and Ohio.

#### **Florida Commission for the Transportation Disadvantaged**

Florida is often regarded as a model throughout the country for human service coordination. The Florida Legislature first created the Coordinating Council on the Transportation Disadvantaged in 1979 to foster coordination; the program was amended in 1989 with the establishment of the Commission for the Transportation Disadvantaged (CTD) to improve coordination for the cost-effective provision of transportation for the transportation-disadvantaged population<sup>2</sup> Housed within the Florida Department of Transportation, this commission is an independent state agency that serves as the policy development and implementation agency for Florida’s Transportation Disadvantaged (TD) program, and to otherwise oversee coordination in the state. The legislature included 27 specific tasks in the statute for the Commission, including acting as an information clearinghouse, developing coordination policies and procedures, determining performance standards and liability insurance requirements, and designing and developing training programs.

As in Washington, members of the commission include a combination of voting and non-voting members, and representatives from various state agencies, including Transportation, Veterans

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<sup>1</sup> Transportation Research Board, TCRP Report 105, Strategies to Increase Coordination of Transportation Services for the Transportation Disadvantaged, 2004.

<sup>2</sup> Chapter 427 of the Florida Statutes

Affairs, Medicaid and others. The make-up of the Commission was overhauled about two years ago to remove appearance of conflicts of interest from private parties who previously served on the Commission.

A major function of the CTD is administration of the Transportation Disadvantaged Fund. This fund is largely comprised of revenues from vehicle registration fees but also includes grants from the Florida DOT and Highway Trust Fund. These funds are disbursed to the community transportation coordinators to provide services for the transportation disadvantaged, defined as those persons who because of physical or mental disability, income status, and/or age are unable to transport themselves and whose trips are not otherwise sponsored by an existing program. Hence, this program provides the “funding of last resort” for non-sponsored trips.

FY 2005 revenues from all sources that went through the community transportation coordination system totaled \$353 million. The CTD contributed about 16% while Agency for Health Care Administration (Medicaid) contributed about 17%. Other large purchasers of service included Department of Children and Families (6%), Florida Department of Transportation (4%), Department of Elderly Affairs (3%) with local agencies purchasing the largest share at 42 percent.

Another task of the CTD is to provide technical assistance to local coordinating bodies.

## **Iowa State Level Transportation Coordination Council**

Iowa has a State-level Transportation Coordinating Council that is responsible for setting coordination policies and allocating demonstration funding. The state legislation that established this council also established 16 regions, each with designated transit agency to lead the coordination efforts in that region; and required that all agencies spending public funds for passenger transportation (other than school transportation) must coordinate or consolidate that funding with the lead coordinator in their region. Thus, these lead transit agencies must coordinate planning for transportation services at the urban and regional level by all agencies or organizations that receive public funds and that purchase or provide transportation services.

Housed within the Iowa DOT Office of Public Transit, the Transportation Coordination Council is comprised of representatives of a variety of 15 state agencies and organizations, including the Iowa Association of School Boards, the Iowa League of Cities, and United Way.

The Iowa Transportation Coordination Council focuses much of its ongoing efforts on educational awareness and outreach, which has included sponsoring coordination conferences and workshops and providing extensive technical assistance. It has also been instrumental in the formation of regional Transportation Action Groups (TAGs) that function as regional coordinating councils.

As part of its technical assistance efforts, the Iowa State Department of Transportation is responsible for distribution of a \$500,000 state coordination fund that comes from general state funds. This fund is used for 2-year grants to help fund fledgling coordination efforts on the local/regional level. These grants require a 20% local match in Year 1 and a 50% in Year 2 and cover both operating and capital needs.



## **North Carolina Interagency Human Service Transportation Council**

In December 1978 Interagency Transportation Review Committee (ITRC) was established by executive order. Composed primarily of representatives from the State Departments of Transportation and Health and Human Services, the ITRC was primarily a technical committee with the job of reviewing all transportation funding applications for both departments to determine if proposed projects met certain goals such as coordination and accessibility.

The ITRC continued until 1991 when it was replaced by the North Carolina Human Service Transportation Council (HSTC) which was authorized by another executive order. The Council continues in operation today and meets quarterly, serving in an advisory capacity to the N.C. Department of Transportation, the N.C. Department of Health and Human Services and other state agencies in addressing needs, barriers, policies and opportunities for the provision of human service transportation.

The HSTC also undertakes studies and demonstration projects to enhance the state's coordination efforts. Its mission is to provide leadership in improving the coordination of human service transportation and to ensure that funds are maximized to serve as many elderly, disabled and financially disadvantaged individuals in the state of North Carolina as possible in a safe, efficient and effective manner.

With the support of the state-level council, NCDOT initiated the Community Transportation Program (CTP) which involved consolidating FTA Section 5310, Section 5311, and several state funded programs into one community transportation service block grant. The unique element of this block grant program is that the counties (there are 100 in North Carolina) must prepare a coordination plan to receive the grant monies.

North Carolina also has coordination incentive grants under its Human Service Transportation Management (HSTM) Program using the state highway fund as the primary financial source to help assist local agencies interested in coordination conduct planning and implementation activities. HSTM funds can be used to pay for staff to support human service transportation systems in their coordination efforts. Lead agencies identified by locally adopted transportation development plans are the designated recipients for HSTM funds, which can be used for up to 75% of the cost of the salary and benefits of a fulltime coordinator.

## **Ohio Statewide Transportation Coordination Task Force**

As part of the Transportation Partnership of Ohio, a Statewide Transportation Coordination Task Force was established to improve and increase access to state agency programs and services and enhance service and program quality, and ultimately the quality of life, for Ohioans through transportation coordination.

Efforts of the Task Force have focused on reducing duplicative programs and services, eliminating conflicting State requirements and regulations, and making better use of local, State and Federal resources. The mission of the Task Force is to "provide leadership that facilitates citizen mobility through the coordination of transportation resources and effect pro-coordination policy and communication at all levels."

Task Force goals include:

- Increase awareness and access to information about transportation coordination and statewide transportation resources
- Increase the Task Force's presence statewide
- Empower local leaders to achieve coordination
- Educate the state legislature and state leaders about transportation coordination
- Make existing rules and regulations coordination-friendly
- Identify and use technology resources to accomplish the action strategies needed to meet the goals
- Maximize the availability, use and flexibility of funding resources to support coordination
- Support local agencies in their efforts to increase consumer access to transportation services

Through ODOT, the Task Force oversees a Coordination Fund, financed from the state general fund, used to provide seed money to fledgling coordination efforts on the local level. It should be noted that these efforts are self-starting and self-selecting on the local level. There is no mandatory form or boundary for a coordination body in Ohio. The primary goal of the coordination program is to enhance and expand transportation through coordination in Ohio's counties that lack a public transportation system. All projects must demonstrate some level of interagency coordination in their local area to be eligible for funding, and must designate a lead agency to administer day-to-day operations, execute memoranda of understanding with all participating agencies, have a full time coordinator and commence the project within 90 days of contract award.

The total funding available for these grants was FY 05 is \$1.3 million. Since beginning this effort, ODOT has provided approximately \$6.3 million in grants to 37 projects. As a result of this program, the number of counties in Ohio without any public or coordinated transportation services has been reduced from 42 to 14, out of a total of 88 counties.

## Lessons Learned from the Four States

Four primary lessons learned from these successful state-level coordinating bodies are:

- 1. There needs to be a state-level council or body to foster coordination in the state.** Bi-level oversight is also necessary, with local/regional coordination councils charged with implementing coordination policies on the local level, overseeing local/regional coordination efforts, and providing feedback to the state-level coordinating council.
- 2. Membership in the state-level council should be inclusive.** The four bodies reviewed all include the representation from key state agencies. Some of the councils made it a point to include the Department of Education, Head Start, and the Association of School Boards. One also included a representative from the Governor's Office. Three of the state-level bodies also have representations from additional stakeholder organizations such as an Association of Counties or County representative, a League of Cities, the state's Public or Community Transportation Association, Veteran's Affairs, and the United Way.
- 3. The Councils and their composition should be established by statute or executive order.** This legitimizes its mission and gives the council some permanence.

- 4. Councils should have “teeth” over coordination policies and the coordination infrastructure.** While all provide – either directly or indirectly – significant technical assistance, it is the councils that provide incentive/seed funding and/or require coordination (with the power to withhold funding for non-compliance) that have successfully overseen the establishment of coordination efforts on the local/region level.

## Organization of Local Coordination Efforts

Most successful state-wide coordination efforts have (1) instituted local coordination on a county-based or regional level, and (2) have instituted this kind of framework for coordination with a legislative act or Executive Order. Among others, local coordination infrastructures have been established by legislation in Florida, Iowa, Maine, and Pennsylvania, and by Executive Order in Kentucky, Maryland and North Carolina. The specific designs for these programs are discussed below.

### Florida

One of the major functions of the state-level Commission for the Transportation Disadvantaged is to designate an Official Planning Agency for each county or region. The official planning agencies that have been so designated include twenty four metropolitan planning organizations or transportation planning organizations, six regional planning commissions, and seven other entities which, in turn, appoint a Local Coordinating Board (LCB). The Local Coordinating Board is an advisory board (meaning it is composed of appointed members, rather than elected members) which provides information, advice, and direction to the Community Transportation Coordinator regarding coordinated transportation.

The Local Coordinating Boards (LCBs) are staffed by a member of the Official Planning Agency. Each county in the state has a LCB. Membership on the LCB is comprised of local elected officials, staff of agencies involved in, or supported by, special needs transportation and people who use special needs transportation. Each LCB meets at least quarterly. Its committees meet when necessary to conduct an annual evaluation of the Community Transportation Coordinator, write annual updates, including goals and objectives and policies for a long range plan, and review grievances which may be brought to it regarding transportation services. The LCBs, through the Official Planning Agencies, recommend Community Transportation Coordinators to the CTD, which then contracts with each Community Transportation Coordinator for the provision of TD transportation in their respective areas. The Community Transportation Coordinator is responsible for arranging transportation for people who are elderly, or low-income, or, who have a disability.

Currently, 49 CTCs cover the state’s 67 counties; while most cover a single county, some cover a multi-county region. Once the CTCs are established, sponsoring agencies may purchase service for their clients through the statewide CTD (as the Agency for Health Care Administration does) or directly from the local CTC. The service delivery structure varies by county. Most of the CTCs directly provide transportation or subcontract operations (in the case of brokers), or do both. In some counties/regions, ADA paratransit service goes through the CTC, while in other counties, it is a separate system.

### Iowa

The state legislation that established the State-level Transportation Coordinating Council also established 16 regions, each with designated transit agency to lead the coordination efforts in that

region; and required that all agencies spending public funds for passenger transportation (other than school transportation) must coordinate or consolidate that funding with the lead coordinator in their region. These lead transit agencies are required to coordinate planning for transportation services at the urban and regional level by all agencies or organizations that receive public funds and that purchase or provide transportation services.

The State-level Transportation Coordinating Council also has been instrumental in the formation of regional Transportation Action Groups (TAGs) that function as a regional coordinating council, with the local transportation planning agency responsible to oversee the planning process.

## Kentucky

In 1999, the Kentucky State legislature mandated that community transportation services be coordinated through a brokerage structure that covered the entire state. Vested with the responsibility to set up this structure, the Kentucky Transportation Cabinet (the equivalent of the State DOT) established 16 regions, and selected brokers through a competitive procurement process. Of the 16 current brokers, 11 are transit agencies/providers, 3 are taxi companies, and 2 are private brokers – one for-profit and one non-profit. The state departments of Medicaid and Families & Children purchase service through these brokers, with rates established for each region. The brokers, many of them providers, all have established a network of subcontracting operators, who are also used for service delivery. For Medicaid, the brokers ensure that clients are eligible based on eligibility lists provided by the state and that the trip they are seeking is an eligible trip. The general structure of this is very similar to Washington State; in particular, the Medicaid trips of recipients who can use fixed route public transit are served in that manner, while the co-mingling of Medicaid trips with other paratransit trips (e.g., ADA, seniors) is limited.

## Maine

In the late 1970's, Maine passed a law requiring the departments of Transportation and Human Services and the former Department of Mental Health and Mental Retardation to coordinate the planning of transportation. Taking the lead, the Maine DOT designated nine Regional Transportation Providers (RTPs). Some of the regions cover a single county while others cover multiple counties. (There are 16 counties in Maine.) Various funding sources for community transportation (30 to 40 in all) are funneled through these RTPs, including Medicaid NEMT, which comprises about 80% of all special needs transportation funding in Maine. Other agencies sponsoring large volumes of trips include Child Development Services, MH/MR, and senior programs.

Of the nine RTPs, some are transit agencies, while others are community action agencies. All have fleets of vehicles, subcontracts with taxi companies, and a volunteer driver program.

## North Carolina

In North Carolina, a county-based coordination structure was established by the same Executive Order which created the North Carolina Human Service Transportation Council.

As mentioned previously, North Carolina DOT created a block grant program that consolidated community transportation funding, and that each county must have in place a coordination plan in order to be eligible for those block grants. Three additional pre-requisites for block grant eligibility are: (1) a transportation advisory or governing board must be established; (2) there must be a

lead coordination agency designated; and (3) the lead agency must have a Memorandum of Understanding (MOU) with each of five “core agencies” which include the Departments of Social Services, Aging, Mental Health, Health, and Vocational Rehabilitation.

In most of the 100 North Carolina counties, the lead coordination agency is a department of the county or an independent transit agency. In a handful of counties, a private non-profit agency serves as the lead coordinating agency. Note that the block grant is provided to the lead coordinating agency. Capital and project administration activities associated with local coordination projects are among the costs that can be covered by these block grants.

## Lessons Learned in other States Local Coordination Efforts

- 1. Coordination should have a formal bi-level structure.** In all of the examples provided, a formal infrastructure design for coordination has been established. As mentioned previously, this has typically involved a bi-level oversight structure with a state-level transportation coordinating committee in place to set policies that either foster coordination or put into practice coordination requirements that have been ordained by executive order or the state legislature. The local organization, a county or regional-based coordinating council, put the policies into practice and otherwise foster/implement/oversee coordination activities directly between the customers and the service providers.
- 2. Responsible local units should be formally identified for uniformity.** In many cases, it has been the state-level coordinating council or one of the member agencies (typically the DOT) that establishes the coordination infrastructure design. In many cases, the basic building block for this infrastructure design has been the county, especially if most community transportation funding flows through county departments and/or if counties are particularly strong in the particular state.
- 3. Coordinating bodies should provide state-wide coverage.** The most successful states have defined community transportation regions that cover the entire state. The premise for full coverage is: (1) it takes into account – and better addresses – the need for, coordination of and provision of regional trips; (2) it simplifies statewide administration and technical assistance; and (3) it takes advantages of existing coalitions and stakeholder councils and provides a closer “look” for prioritizing projects; and (4) it is easier to identify a local/regional champion and lead agency.

## Local Service Delivery Coordination Models

This section examines in detail best practices from other states on local and regional service delivery designs. The enabling legislation for this study specifically required an in-depth look at the special needs transportation service delivery model in Pittsburgh, Pennsylvania. It is described below, along with one other general public special needs program and two programs with specific implications for delivery of Medicaid non-emergency medical transportation.

## **ACCESS, Pittsburgh/Allegheny County, PA**

### **System Design and Service Delivery**

ACCESS is an administrative, decentralized brokerage that provides coordinated, shared-ride, advance-reservation, door-to-door paratransit service in Pittsburgh and the rest of Allegheny County, which totals 775 square miles and has a total service area population of 1.35 million. While ACCESS is open to the general public, the program primarily serves person with disabilities, seniors, and clients of human service agencies. ACCESS is sponsored by the Port Authority of Allegheny County (the regional public transit provider), which contracts with a for-profit company, ACCESS Transportation Services, Inc. (currently, a subsidiary of Veolia Transportation) to manage the service.

Through a combination of local leadership and circumstance, this model of coordination and service delivery evolved in Pittsburgh without benefit of a state level organization. It should be noted that this formation is not common in the research done on successful coordination efforts, but could occur almost anywhere if the correct set of conditions were present. Following formation of ACCESS the state of Pennsylvania did begin state level coordination efforts and some other parts of the state do have coordinated special needs organizations, but none of them as notable or unique as ACCESS.

The broker is responsible for coordinating ADA paratransit trips, senior trips, and client trips of sponsoring human service agencies. In turn, the broker contracts with a variety of local service carriers, who are responsible to accept reservations, schedule and dispatch trips, and for overall service operations and vehicle maintenance. The service carriers also provide their own vehicles, fuel, insurance, and software.

The broker also conducts ADA paratransit eligibility certification (aided by a contractor), and is responsible for oversight of service contracts with the service providers, performance monitoring, reporting, travel training, customer service and advocacy functions, public participation, and scrip sales, as well as establishing contracts with human service agencies wishing to transport their clients through the ACCESS program.

Currently, ACCESS service providers include two non-profit operators, and six for-profit carriers. Service providers are selected through a yearly competitive bid and negotiation process. Service area assignments are not all exclusive; in some of the more populated areas, customers have a choice of service provider. The system remains competitive, with service area assignments based on demonstrated performance and cost. All together, the carriers operate about 430 vehicles all of which are dedicated to the program.

In 2005, ACCESS served about 1.9 million trips, about 7,000 trips on an average weekday. The system-wide productivity for 2005 was 2.35 trips per revenue vehicle hour. On-time performance was 94.6%, while the complaint rate was 5 per 10,000 trips.

### **Types of Trips Provided**

ACCESS has achieved a large measure of success in coordinating ADA paratransit, senior shared services, and human service agency transportation services, with trips sponsored by multiple funding streams co-mingled using a simple, but effective and agreed upon cost-allocation model. In terms of service consumption, senior trips reflect about half the trips, ADA trips about 30%, escorts 5%, agency-sponsored trips 14%, and general public trips at less than 1%.

## Section 504 and ADA Paratransit Service

ACCESS has been providing services for persons with disabilities since 1978, as a result of local agencies and providers working together under a federal demonstration grant. Following passage of the ADA in 1990, ACCESS has served to meet the Port Authority's ADA complementary paratransit obligations. The program actually exceeds the minimum ADA paratransit requirements in a number of different ways.

### Senior Shared-Ride Program

In Pennsylvania, a state program utilizes state lottery proceeds to fund 85% of the cost of shared-ride services for seniors. In Allegheny County, ACCESS (through the Port Authority) provides shared-rider services funded by this program.

### Human Service Agency Transportation Programs

ACCESS provides service for clients of 121 different human service agencies including Medicaid recipients whose non-emergency medical transportation is sponsored through the state's Medical Assistance Transportation Program. The primary reason for this degree of acceptance and success is that ACCESS has effectively demonstrated that a well managed cost effective brokerage can provide high quality services and contain costs through coordinating resources and maintaining a high degree of competition among transportation providers. Interestingly, the Pittsburgh model has seen limited application in other communities but some communities in Pennsylvania have adopted other centralized coordination agencies by pooling resources or contracting for specific areas through a centralized body. However, the closest replication to the ACCESS model is Access Services in LA where a centralized manager operates ADA paratransit service for the entire county.

### Decentralized Reservations; Cash-less Fare System

To request service, customers call a carrier serving the area in which the customer lives. ADA paratransit customers and seniors pay fares with discounted scrip they buy from ACCESS. Clients of human service agencies do not pay a fare; fares for these trips are billed to the sponsoring agency. For sponsors with a low volume of trips, the trip rates are based on the zone fares. For heavy-use agencies, a per-trip rate is estimated. This is based on two parts: (1) an estimate of the previous year's average actual cost of providing service for each sponsoring agency; this is calculated from a statistically-relevant sample of trips sponsored by that agency, with cost assessed by time and based on the particular carrier's hourly rate. This average operational cost per trip is then added to the average cost of brokerage administration fees calculated on a per trip basis. This process is done once a year and is reviewed mid-year. This method of allocating costs has been accepted by PenDOT, the state Medicaid Administrator and the local transit provider, the Port Authority of Allegheny County.

## Lesson Learned from ACCESS

1. **Competition and economy of scale.** With its ongoing efforts to improve and maximize ride-sharing opportunities and shared administrative costs, ACCESS has been able to achieve significant cost efficiencies and service quality over the years. While economies of scale certainly contribute to the efficiencies, managing a competitive marketplace is equally as important.
2. **Continuous review of providers.** A related element that is unique to ACCESS is annual procurements, which contributes to both cost control and service quality. With annual

procurements, the ACCESS broker can implement changes with relative ease. Another element is ACCESS' focus on grooming local carriers.

3. **Portability of concept may only be possible in unique circumstances.** The ACCESS design was based on the volume of trips from likely participating sponsors, and the existence of several carriers – both for-profit and non-profit – from the private sector, many of whom continue to be a part of the system. If these carriers had not been present, the design of ACCESS might have been very different.
4. **Private agencies have greater flexibility.** ACCESS, for many special needs individuals and agencies that serve them, is the face of the public transit authority in Pittsburgh. But, because it is not a public entity, it can manage the brokerage in a way that public entities may not be able to.
5. **Local conditions may largely determine success.** The service delivery design was and is dependent on there being a sufficient number of local carriers in place to handle the zones (there are 8 zones). A recent national trend has been acquisition of successful local paratransit providers by large multi-national transit providers. ACCESS, wanting to guard competition among providers, limits each provider to no more than 60% of the trips in the area.
6. **Cost allocation models can be simple, accurate and acceptable.** The cost allocation model (based on a statistically valid sample for heavy-usage agency's trips) is universally applicable.

## Best Practices in Medicaid Transportation

In this section, examples of best practices in the delivery of Medicaid transportation in a coordinated setting are provided; both state and local level examples are discussed. In coordinating Medicaid transportation with other community transportation services throughout the nation, particular service issues have been identified. These issues include:

1. **Allowing co-mingling/non-exclusive rides:** Most coordinated community transportation systems provide public transportation and are supported with FTA funding. FTA funds can be used to support public transportation and generally not used to compete with privately operated transportation services, although FTA has recently clarified that coordination with Qualified Human Service Organizations does not violate the no compete requirements. In some areas, concern has been expressed that co-mingling Medicaid clients with other public patrons could violate Health Insurance Portability and Privacy Act (HIPPA) regulations.
2. **Curb-to-curb vs. door-through-door:** Most community transportation systems operate under a passenger assistance policy that provides “curb-to-curb” service, a standard that is consistent with federal ADA requirements. Some human service agency clients, notably Medicaid clients returning from physically demanding treatments, may require a higher level of passenger assistance, including “door-to-door” or “door-through-door” assistance.
3. **Written confirmation of delivery:** Providers of Medicaid transportation services must be able to establish, through written documentation, that the transportation services were actually provided to an individual client. This is not a common practice with public transit authorities.



- 4. User choice vs. assigning carrier or system:** Medicaid rules provide that participants have a choice of service providers. In coordinated systems that have actually consolidated service delivery under the auspices of a single operator, there are issues as to whether such systems comply with the “freedom of choice” provision within Medicaid rules. It should be noted however, that this only applies to states providing transportation under the Medicaid Transportation Program rules as opposed to those providing service under an administrative waiver, which is what is done in Washington, leaving this as a non-issue for this state.

Despite these local service issues, several states have achieved success in maintaining Medicaid as a key and critical component of a fully coordinated system. These states include Florida and North Carolina.

## Florida

The Commission for the Transportation Disadvantaged (CTD) discussed previously has statutorily mandated oversight over local coordinators and conducts periodic reviews of each operation in addition to the annual local reviews discussed above. This internal quality assurance mechanism is supplemented by occasional external review, as well. An independent assessment conducted for the Agency for Health Care Administration (AHCA) showed the coordinated system saved between \$23 and 54 million to the State of Florida in Fiscal Year 2002 (Executive Summary is included as Appendix G).<sup>3</sup> These savings are achieved because local coordinators are given wide latitude in the methods of transportation service delivery provided to eligible individuals. This works to ensure that coordinators are making efforts to find the lowest cost transportation for all individuals, including Medicaid eligible individuals.

The structural arrangement making this partnership successful is the state level agreements that have been forged. The Commission for the Transportation Disadvantaged is under contract with the Agency for Health Care Administration, the state Medicaid agency. Under the terms of this agreement, a flat monthly fee is paid to the Commission. The Commission, in turn, pays the state’s forty nine Community Transportation Coordinators who provide services through a network of providers (480 providers statewide) based on annual review of a cost allocation model. The CTCs may use any method to provide transportation services (gas vouchers, mileage reimbursement, rental cars, etc.), including direct operation of services.

This unique state level partnership has resulted in Medicaid remaining a significant contributor to the community transportation system. Indeed, behind local government contributions, Medicaid is the second largest funding source in the system, comprising 16.5 percent of all revenues. However, it should be noted that in recent years AHCA funding for Medicaid trips has remained at 2002 levels with no increase reflecting inflationary pressures nor any increase in the number of Medicaid eligible individuals. This has resulted in a local dilemma for the CTC’s. Many are now using TD funds to take care of Medicaid trips, leaving new gaps for people previously funded through the TD funds.

## North Carolina

As noted earlier, the State of North Carolina has one of the longest running state level coordination efforts in the nation. North Carolina’s program has historically been based on the development of county-based community transportation systems. The state Medicaid agency,

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<sup>3</sup> full report available at: <http://www.dot.state.fl.us/ctd/docs/Independent%20Assessment%20October%202003.pdf>.

uses a county based system that corresponds to the infrastructure supported by the Department of Transportation through its Community Transportation Program.

In the early stages of coordination implementation, North Carolina used a transit development planning process to permit local counties to designate an entity to serve as the consolidated service provider who in turn would coordinate services among five major human service agency programs: Medicaid, Social Services Block Grants, Title III-B of the Older Americans Act, Area Mental Health programs, and Vocational/Rehabilitation programs. In the mid-1990s, as the state moved to implement welfare-to-work reforms, a new alternative to the single (consolidated) service provider emerged. The state embraced the “family of services concept” wherein the lead service provider in each county would continue to provide services but would also engage the services of contractors to expand the types of service and the days/hours of service of the coordinated system. Additionally, the coordinated systems were permitted to provide direct payments to clients, including mileage reimbursements, payments to families, provision of taxi and bus fares, etc. By expanding the allowable scope and role of the designated lead agency for coordination, local systems were in a position to work cooperatively with local Departments of Social Services in arranging for the most cost effective transportation service for Medicaid clients.

### **Lessons Learned in other States Medicaid Programs**

The keys to successful coordination of Medicaid services with the local community transportation system are based on:

- Medicaid participation in a statewide program of community transportation services is feasible. The Florida example has shown that and it documented that cost savings can occur as a result of this type of partnership.
- A funding source that grows as demand grows is necessary when accepting responsibility for an entitlement transportation service, such as Medicaid. Recent financial woes for Florida’s Commission for the Transportation Disadvantaged caution against accepting responsibility for Medicaid, or any entitlement transportation, without a dedicated stable and growing funding source is a high risk venture.
- Strong state legislation and participation are important ingredients to successful integration of state and local programs.
- On-going communications between state agencies charged with transportation for people with special needs is critical to success.
- Accountability and inspection are important components to ensure customers receive appropriate and cost effective services.
- State support of locally based community transportation systems is important to achieve flexibility in combination with local knowledge.
- Brokerage structures provide the necessary scope and flexibility to serve Medicaid reform and cost containment priorities as well as provide necessary and quality services to Medicaid clients.
- Strong financial incentives and written agreements between the state and local entities can play a role in fostering coordination in a manner that builds a flexible system that can meet a number of differing customer needs.

## Establishing a Bi-Level Coordination Model in Washington State

How can the lessons learned from these model programs be applied locally? The following discussion proposes a potential coordination model that builds on those best practices and acknowledges the strengths of the Washington State Medicaid broker arrangement. Successful elements of a bi-level structure include both strong coordination oversight at the statewide level, and an infrastructure to implement coordination at the local level. Steps proposed to advance this concept include:

1. Strengthen the role of ACCT by empowering it to develop and implement statewide transportation coordination policies, and to contract with local Community Access Managers
2. Establish a Local Coordinating Board (LCB) in each region to (a) recommend the designation of the Community Access Manager (CAM), (b) to monitor its performance, and (c) to advance coordination initiatives and programs within the region.
3. Delegate a Community Access Manager for each region to operate and/or coordinate community-based transportation services within its designated area.

Specific recommendations are further presented and discussed in Chapter 9, and are based on the following principles:

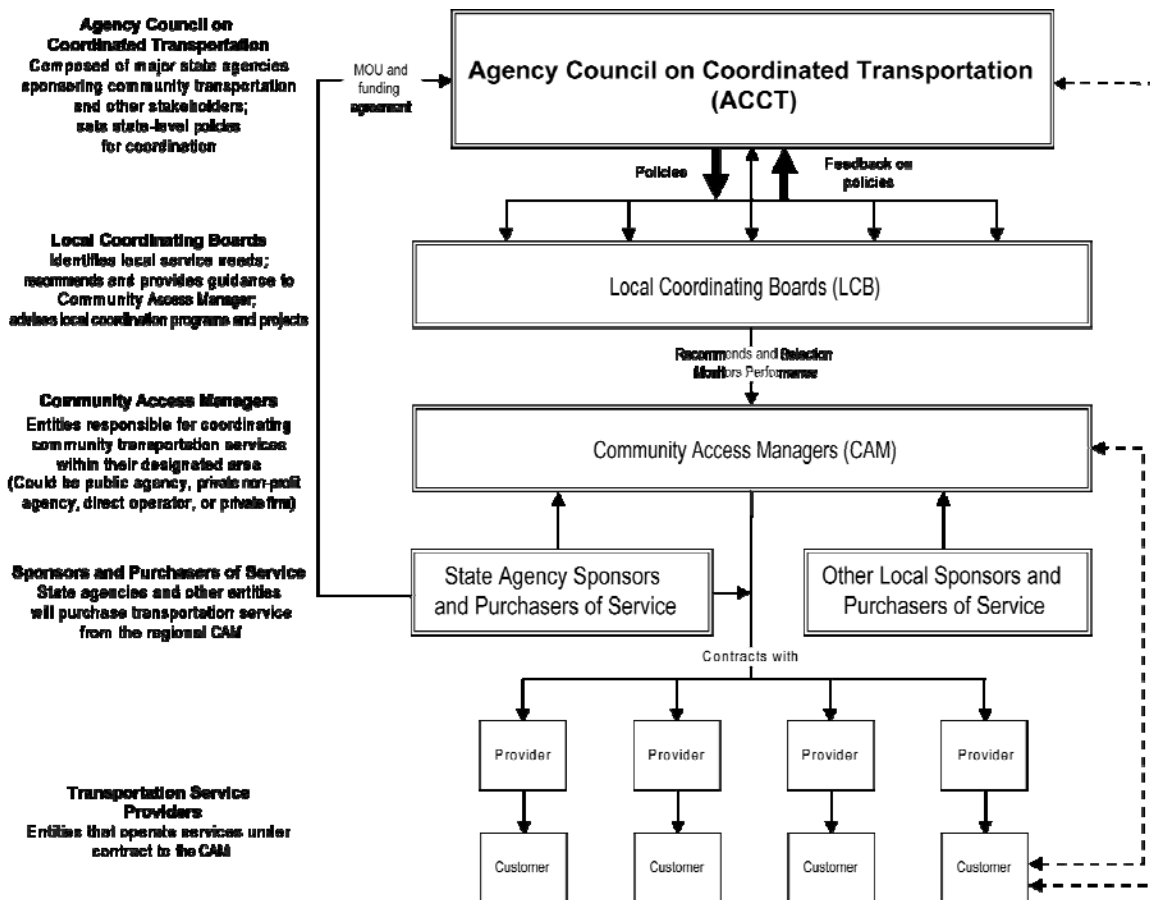
- **View coordination is a process, not as the ultimate goal.** Coordination can be an effective tool or strategy to enhance mobility, but should not be viewed in isolation from achieving this goal.
- **Effective coordination policies and procedures need to be established at both the state and local levels.** Those states identified as “best practices” coordination programs have established a bi-level coordination structure with a statewide council to define and oversee statewide policy guidance, and local coordination councils to implement locally-based solutions. This approach allows for both clear direction to be issued at the statewide level, and for the development of solutions based on unique local circumstances.
- **Seek to advance coordination where there is greatest opportunity and potentially the highest “bang for the buck.”** As implied, it makes sense to initiate coordination where there is the greatest impact. In Washington, one such opportunity is in addressing duplicative trips provided through the Medicaid and ADA paratransit programs.
- **Build on strengths:** Future coordination activities should build upon and take advantage of lessons learned from successful building blocks already underway in Washington.
- **Test new concepts:** Pilot projects are an ideal way to test new concepts and approached that have the potential to be applied state wide. There is great opportunity to learn from pilot projects while minimizing risks to clients.
- **Recognize tradeoffs between efficiency and quality:** Public programs must be accountable and focus their programs to serving the public good. It is important to recognize the inherent tradeoffs and ensuing compromises when decisions are made in

directing the use of limited public funds. These trade-offs may differ by community and reflect local priorities and values.

- Foster creativity:** The current economic environment is one of budgetary constraint as public programs economize and seek further efficiencies. This economic climate and concern for increased demand as the population ages provide a strong incentive to consider flexible and alternative approaches to how services are delivered.

Figure 7-1 graphically portrays the structure proposed for Washington, including the relationship of ACCT with the newly established Local Coordinating Boards and Community Access Managers. It also characterizes the role of state agencies and local providers in providing services to the special needs customer.

**Figure 7-1 Proposed Washington State Coordinated Community Transportation Services Organizational Chart**



A number of factors were considered in developing a bi-level coordination structure for Washington State, including:

- What new roles and responsibilities should be taken on by ACCT?
- Where should ACCT be housed, and what resources are needed to staff a council assigned with new responsibilities?
- How should “local” be defined when establishing coordination regions?
- What are the roles and responsibilities of Local Coordinating Boards and Community Access Managers?
- What staffing resources are needed to support Local Coordinating Boards?
- How should the Community Access Managers be selected?
- What are some benefits and risks inherent in this proposed arrangement?

In some cases, a variety of options were considered in developing the final recommendations. Ultimately, preferred approaches were based on findings that emerged from conducting stakeholder interviews and public forums, as well as examining best practices and model programs. These conclusions are intended to support the goal of establishing a meaningful coordination structure that can build on existing program strengths.

### ACCT’s Role

Chapter 3 discusses in detail ACCT’s roles and responsibilities and the perception of its effectiveness as expressed by ACCT members and other stakeholders. As pointed out, ACCT, as the statewide coordinating council, is not empowered with the authority to establish or oversee legislative expectations. There are no clear incentives for agencies to participate in coordination objectives; nor are there repercussions if they do not. The first step in establishing a bi-level coordination structure, then, as evidenced by other successful models, is to delegate this authority to the Council. Through statewide legislation, ACCT bylaws should be amended to include the following tasks and responsibilities:

- Create a statewide infrastructure for coordination
- Execute a Memorandum of Understanding (MOU) and Funding Agreement with participating state agencies that would spell out respective roles and responsibilities
- Contract with local Community Access Managers
- Compile all available information on the transportation operations for and needs of the special needs transportation groups in the state
- Establish statewide objectives for providing special needs transportation services
- Develop policies and procedures for the coordination of local government, federal, and state funding for special needs transportation
- Identify barriers prohibiting the coordination and accessibility of transportation services and aggressively pursue the elimination of these barriers
- Serve as a clearinghouse for information about transportation services, training, funding sources, innovations, and coordination efforts
- Provide statewide policy oversight and direction to ensure local coordination efforts are carried out in a consistent manner

- Develop uniform and consistent definitions and reporting requirements for use among all participating agencies and community transportation coordinators
- Provide incentive funding to assist coordination efforts and fund pilot projects
- Provide education/awareness about coordination, and provide technical assistance beginning with the establishment of local/regional coordinating councils.
- Support development of tools to advance coordination, such as automated software to implement cost-sharing arrangements.
- Monitor the progress of local coordination efforts, and report results to the legislature and other stakeholders.

### Where should ACCT be housed, and what resources are needed?

ACCT is housed within WSDOT and staffing is also provided and financially supported by WSDOT. This arrangement has been beneficial in that it allows for transportation expertise to be available to ACCT members, and it has facilitated communication between WSDOT and the Council. A viable option would be to maintain this arrangement even if ACCT significantly expands its role, as is proposed. However, in order to promote independence and autonomy, it may be in the best long-range interest of ACCT and its members to not affiliate itself or be housed with one partner agency. Such independence reinforces ACCT's stature as a statewide agency or commission ultimately serving the Governor and the legislature. Potential options for housing ACCT are the Governor's office, or with the Department of Community, Trade & Economic Development (CTED), which already houses and supports numerous statewide commissions and councils.

Currently, approximately \$96,000 per year is available for ACCT overhead and personnel, or to support one full-time equivalent (FTE). Clearly, assuming new administrative roles such as those envisioned above will require additional staffing resources. In addition, for ACCT to be most effective, it should have funding available to support local coordination programs or to sponsor pilot projects, research, or studies. In the past, ACCT received a maximum of \$1 million for a biennium (1997-99); this financial support has decreased over the years. While ultimately specific tasks and staffing assumptions will need to be developed as part of a comprehensive implementation plan, an estimated range of resources needed for ACCT to assume its new role would be between \$600,000-\$1,000,000 per biennium.

Given that ACCT is expected to serve all state agencies sponsoring special needs transportation services, it is reasonable to assume that these agencies, too, should share in supporting costs associated with its administration. The financial contribution could be proportionately based on the level of service purchased through the community-based programs.

### How is "local" defined when establishing coordination regions?

An important linchpin in the development of the bi-level coordination structure is to reach agreement on the definition of "local" or "regional". Several potential scenarios, along with their pros and cons, are described below.

As indicated in Chapter 9, it is recommended that the current Medicaid service areas be adopted when defining regions.

Option	Pros	Cons
<p><u>Medicaid Regions</u></p> <p><i>Currently, Medicaid services are provided through a brokerage arrangement in 13 regions, based on counties, as established by DSHS. These regions were originally designed to take into consideration the trip patterns of persons needing to reach medical facilities, and have basically remained unchanged for many years.<sup>4</sup> A map of these regions is provided in Chapter 2.</i></p>	<p>Brokerage system already in place within these regions</p> <p>Definition of regions has worked well</p> <p>Least disruptive for largest purchaser of service</p>	<p>Not integrated with other DSHS regions</p> <p>In the long-term, it may make sense for regions to be more aligned with transportation planning agencies</p>
<p><u>DSHS Regions</u></p> <p><i>DSHS services other than Medicaid NEMT are provided through six regions (county-based) statewide.</i></p>	<p>Brings Medicaid and other DSHS services into alignment in defining regions</p>	<p>Could be disruptive to current Medicaid program</p>
<p><u>RTPO Regions</u></p> <p><i>There are 14 RTPOs within the State of Washington, whose regions are defined by counties.<sup>5</sup> These entities are already charged with conducting transportation planning activities.</i></p>	<p>RTPO is charged with transportation planning</p> <p>Technical resources available to support local coordinator</p>	<p>Assumes level of involvement from RTPOs that may not be feasible in all cases</p> <p>Not a traditional role for RTPO</p> <p>Could be disruptive to Medicaid program</p>
<p><u>2-1-1 Regions</u></p> <p><i>There are 8 designated (county-based) 2-1-1 regions within the State of Washington.</i></p>	<p>Infrastructure already supports one-call centers</p> <p>Consistent with role of 2-1-1 centers</p>	<p>Would establish regions not currently defined as either Medicaid or transportation regions</p>

## Role of Local Coordinating Boards

ACCT would be responsible to appoint a Local Coordinating Board comprised of representatives from agencies that purchase transportation, schools, transportation agencies, advocates of special needs transportation clientele and other stakeholders. As applicable, existing coordination councils or committees should be designated as the local coordinating boards. An important function of the LCB will be to serve as the forum and clearinghouse for local coordination issues of interest and concern to special transportation needs stakeholders within the local community.

<sup>4</sup> Currently, Mason County is divided among two Medicaid brokerage regions. North Mason County is considered part of Medicaid Region 5, and South Mason County is considered part of Region 6

<sup>5</sup> Only San Juan County does not participate in any RTPO.

Each LCB would serve in an advisory capacity to recommend to ACCT the designation of the CAM.<sup>6</sup> The local coordinating board will be responsible to develop, in conjunction with the local RTPO, SAFETEA-LU plans and/or updates, a coordination action plan to identify local priorities and strategies to enhance coordination, and to incorporate findings related to connectivity, described in more detail below.

### Staffing Local Coordinating Boards

Many coordination activities are not able to reach fruition because they are taken on by staff whose primary job functions are agency specific and do not allow for attention to taking on new—and often challenging—tasks. In order to succeed, local coordination councils will need to have resources available to allow for dedicated staffing. Resources are needed to cultivate coordination activities at the local level.

One opportunity to provide this resource is by developing mobility management strategies. Mobility management includes a broad menu of practices, which can be grouped into broad strategies, including those that are operational, technological, informational, and land-use oriented. In other words, mobility managers are tasked with carrying out the very functions envisioned to advance coordination initiatives.

Mobility management activities are eligible to receive funding federal funds available through SAFETEA-LU. Mobility management is considered an eligible capital expense under five separate FTA programs (5307, 5310, 5316, 5317, and 5318). This means FTA can fund 80 percent of mobility management expenses. WSDOT (and other designated recipients of federal funds) should prioritize use of applicable funds for this purpose and make them available to support the local coordinating boards and staffing of those boards. It should be noted, however, that prioritizing use of funds for this purpose would make less funding available for other types of projects.

Each Local Coordination Board should determine the best approach to arrange for its staffing; there is no single method. Staffing could be housed within a local agency such as a county, transit agency, RTPO, or local non-profit agency.

### Role of Community Access Manager (CAM)

The basic approach utilized by the Washington State Medicaid program to contract with brokers to deliver transportation services at the local level has worked well and should form the basis for establishing a CAM in each region. Specific roles and responsibilities would need to be spelled out on a case-by-case basis, depending on guidance provided by the Local Coordinating Board. In general, the CAM would be responsible to:

- contract with a variety of service providers
- arrange for the appropriate mode of service based on customer eligibility
- operate—or contract out, through the local 2-1-1 program, a call center that would provide information and referral to customers
- contract with DSHS and other state agencies who purchase transportation services for their clients

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<sup>6</sup> It will be important to ensure that there is no conflict of interest among members of the local coordinating board when the CAM is selected.



- contract with other agencies or programs that wish to purchase transportation services through a brokered arrangement
- ensure that services are delivered according to those agencies' expectations
- report on service performance

## Selecting Community Access Managers

Currently, the Medicaid brokers are selected through a competitive process administered by DSHS. An alternative used by other states (for example Iowa, Oregon) is for the state to designate the public transit operator as the Medicaid broker. Such an approach avoids time-consuming procurement processes, establishes more stability, and makes use of existing transportation expertise. On the other hand, selecting a broker or community coordinator through a competitive process allows project sponsors to have a choice and to more easily make changes if the status quo is not responsive to local needs.

Assuming a competitive procurement process, who would manage the selection process? This is an important decision as it potentially represents a significant departure from the status quo. Some options include:

- Direct DSHS to select the CAM: Currently, regional Medicaid brokers are selected by DSHS, and this arrangement could continue. As the largest purchaser of service, DSHS has a vested interest in the outcome. This approach, however, does not promote a locally-driven decision and does not allow other stakeholders an equal voice in the decision-making process.
- ACCT could conduct the procurement process
- ACCT could, by mutual agreement, delegate responsibility for administering the procurement process to a local agency, such as the RTPO or County. In either case, the LCB would recommend a candidate, and ACCT would approve the selection and enter into a contract with the CAM.

## Benefits and Risks

Although recommendations build upon current program strengths, potentially, the development of this arrangement represents a significant departure from the status quo. Therefore, it is important to anticipate the potential benefits and concerns in implementing such an approach.

### *Benefits*

- Establishes a single point of initial contact for customers
- Potentially eliminates or reduces program redundancy (call center staffing, administrative and overhead costs, etc.)
- Allows social service agencies to better focus on their primary mission by delegating oversight of transportation programs
- Allows social service agencies purchasing transportation to establish service expectations unique to their customer base
- Facilitates, where appropriate, vehicle sharing and co-mingling of agency customers to improve cost-effectiveness, and other coordination strategies
- Empowers state and local coordination councils and clarifies their roles

### *Concerns*

- Perceived lack of direct control by social service agencies over transportation
- Transition may prove challenging and confusing, at least in the short term, to customers
- May place too much authority with one entity (ACCT)
- This approach represents a significant departure from current practices for DSHS. The buy-in and support by DSHS is critical to its success.

Specific program recommendations and proposed next steps are outlined in Chapters 9 and 10.

## Chapter 8. Approaches to Uniform Cost and Reporting Procedures

Cost accounting systems and data collection are integral to the success of coordination. To be successful, many coordination strategies require either sharing transportation costs, or the allocation of costs between programs. Without uniform accounting procedures, transportation costs are frequently unknown, underestimated and/or not reported in consistent formats. It becomes difficult to allocate transportation costs between entities when multiple programs seek to share costs or contract for services.

Uniform cost and reporting procedures seek to address a number of questions including:

- Are costs fully allocated to include appropriate levels of overhead in addition to direct costs?
- How many categories of account detail are sufficient to identify costs across program functions and for funder requirements?
- Can the resulting costs be reported in service units (cost per mile, passenger, hour etc) as required by coordination partners and/or funders?
- Are costs reported over appropriate timeframes and in a timely manner?
- Is the system easy to use and maintain?

Some federal programs contain additional provisions that add further complexities to the issue of cost accounting. For example, the Medicaid program requires that when transportation services are provided to clients, the trips must be for medical eligible purposes only, using the least cost method appropriate to client needs. This concept has been incorporated into the Washington Non-Emergent Medical Transportation (NEMT) & Interpreter Services (IS) Brokerage program. Additionally, when services are provided by third party contractors, the NEMT program is obligated to ensure that the only the vendor's usual and customary fee for the service is charged. This requirement has been identified as a potential barrier to new and innovative approaches to transportation coordination in Washington State, as described below.

This provision is often raised when examining options for coordination between Medicaid transportation and ADA paratransit services. When Medicaid procures medical or medical support services from third party vendors, the administering agency must conduct due diligence to ensure that it pays the provider its usual and customary fee that would otherwise be charged to a non-Medicaid eligible individual. If the provider organization lacks a comprehensive or uniform approach to cost accounting (e.g., the ability to distinguish its cost of service of non-emergency medical services vis-à-vis other service delivery), the administering agency cannot make this determination. Moreover, issues have arisen in the definition of what constitutes the "usual and customary fee" in cases where another federal program has provided subsidies and/or grant funds to provide transportation. For example, the usual and customary fee charged by a public transit operator is its fare; however, the fare is typically heavily subsidized by FTA grant funds. This fact notwithstanding, DSHS, through guidance it has received over the years, has concluded that fares, subsidized or not, constitute the usual fee for service. It should be noted that this issue is not unique to Washington State. The Federal Coordinating Council on Access and Mobility (CCAM) is currently working with the Office of Management and Budget (OMB) – the agency of the Federal government that promulgates cost allowability and audit standards for Executive Branch Federal departments – to develop standards to address this problem.

Finally, Medicaid is among the few federal programs that would actually audit provider costs to ensure that this program provision is met. The inability to readily identify trip-level costs on shared rides is a primary reason for not moving forward with shared rides on these often overlapping services. The discontinuation of the Common Ground project in Pierce County is a prime example where the unavailability of accurate, passenger-trip level cost data, without manual processing, was a major impediment to the implementation of the coordination activity.

## Obstacles to Uniform Reporting Procedures

Various states have developed uniform procedures and practices to ensure that transit systems that seek to coordinate services have a uniform approach that incorporates the fully allocated costs of service delivery. Such efforts are not without difficulties, as recent research has identified:

- **Lack of sufficient account detail in organizational accounting systems:** Generally designed for other purposes, the account structures (the chart of accounts) in an organization's accounting system may lack sufficient detail to permit adequate accumulation, segregation, and allocation of transportation costs. Unlike the standard chart of accounts used by most transit agencies, other non-DOT funded programs lack similar guidance.
- **Failure to capture and/or allocate agency indirect or overhead costs:** Many local organizations deliver a range of human services. In many cases, two or more programs share human resources and common facilities-related expenses. These indirect expenses must be equitably allocated to all direct activities of the organization in order to fully reflect the cost of any service provided by the organization. Despite substantial federal guidance on this topic, organizations do not always delineate such costs in basic schedules of program expenses.
- **There is a lack of common definitions for accounts:** Accounting practices vary by local program entity. Accumulation of a certain expense at one agency may be classified as a totally different expense at another organization. Fuel, for example, may be treated as a "fuel" expense at one organization and as "program supplies" at a comparable organization. Common definitions would facilitate more uniform approaches to cost accounting.
- **Lack of common definition of service units:** Even in organizations that account for transportation as a discrete program service and that equitably assign all general and administrative overhead expenses to each benefiting program operated by the agency, there may be deficiencies in tabulation and recording of service data that result in little meaningful insights for management. Different agencies have adopted varying units of services (hours, miles, passengers, trips) and, in some cases, different definitions of a particular unit of service (e.g., trip). Identification of costs is merely a first step in the process; common approaches to unit cost reporting are also needed.
- **Failure to capture service unit data:** Again, even in agencies that practice full cost accounting for transportation, not all organizations capture the requisite level of service unit data to perform meaningful cost analysis.
- **Blended program expenditures:** In some cases, federally supported programs are managed and administered in concert with a corresponding state program. As reported in the following state case studies, in some cases Medicaid funding has been "blended" with significant state funding to provide a comprehensive health care system for a defined user

population. Similarly, many states have developed a wide range of program services under their respective Welfare-to-work initiatives that include a blending of federal and state funds well beyond that of grant matching program requirements. Blended programs can create problems in that entities at the local level may not have the accounting structure in place to segregate expenditures allocable to only the federal portion of program expenditures. In other cases, the local entity may not even be aware of the specific mix of federal and state funds provided by a state agency to implement program activities.

- **Use of capitated payments:** In some programs, particularly those that have adopted a managed care approach to client service delivery, states have adopted an established fixed rate to pay for a range of eligible client services, including transportation. This has become a common feature of managed health care/medical plans or when client services are provided in a long-term care facility. In these instances, there were no examples found in the case studies where the state administering agency required the provider organization to segregate transportation costs.

## Florida and North Carolina – Two Case Studies

Two states have developed tools to account for the full cost of transportation services and translate this cost information into rates to charge third parties who may be interested in purchasing service from the transit provider organization. Once again, the two model states are Florida and North Carolina.

These two states were selected as neither has encountered the problems identified above because prior administrative agreements were reached among departments of state government on these cost accounting issues. These agreements were possible because there were existing and active state level coordination agencies and/or committees. To further utilization of longstanding coordinated transportation infrastructure at the local level, agreements were reached on the issue of usual and customary fare.

In both case studies, practices were adopted that embrace the following principles:

- Wherever possible, Medicaid clients are encouraged or required to use, where appropriate to client needs, existing fixed route public transportation services. Medicaid clients pay the same general public fare charged to a non-Medicaid client for a comparable trip. In many cases, arrangements are made between the transit system and the local Medicaid agency to develop passes specific to the Medicaid program or institute other pre-paid fare plans.
- State agencies have recognized and agreed that the public transit fare for demand responsive services is not represented by the fare charged to a “non-sponsored” passenger. The fully allocated cost of the service is recognized as the cost to the transit provider to provide the service.
- Both states have developed cost accounting tools for use by local transit providers to document their fully allocated rate structures and ensure that a uniform approach to costing transportation services provided under contract. Thus, Medicaid pays on the same fully allocated cost basis as other local programs that may be using Federal funds to support client access to program services.

## Uniform Cost Models - Florida

The Florida Commission for the Transportation Disadvantaged has prepared a “Rate Model Worksheet” to assist local community transportation programs with computing rates for services provided. This spreadsheet application provides flexibility by enabling the provider to generate multiple rate structures, including:

- Rate per revenue mile;
- Rate per passenger trip;
- Combination rate per passenger trip; and
- An add-on rate for ambulatory, wheelchair, stretcher, and group paratransit services.

The model relies on a detailed breakdown of budgeted expenditures for transportation and statewide data to compute various factors that go into the rate setting decision making process (e.g., wait time, groups service load rates, etc.). The model enables a provider to determine the fully allocated rates to charge to agencies that enter into purchase of service agreements with the system and enables purchasers to evaluate rates charged by the provider.

The budget input screen permits model users to input historic, current, and projected revenue and expense data. It should be noted that the model uses the transit type expense categories, as incorporated into this framework’s expense account objects. Actual rate computations are estimated, based on projected passenger trips and units of service delivered (hours and miles), so that model incorporates provisions to adjust rates to reflect actual experience.

Once all data is entered into the worksheet and adjustments made (only in the third year), “program-wide” rates are computed. Reflecting characteristics of Florida community transportation, the model can also compute specialty rates for ambulatory, wheelchair, and stretcher, or other group rates.

## Uniform Cost Models – North Carolina

The North Carolina Department of Transportation (NCDOT) has developed a similar model designed to provide a rate setting model on behalf of its community transportation programs. NCDOT’s “Cost Allocation and Rate Setting Model” has been in use for many years now and is a program requirement. NCDOT does not subsidize the provision of service under contract by a transit system to a human service agency. The Department required that a tool be used to ensure that transit providers would recover the fully allocated cost of providing the service.

The NCDOT Model is not as complex as the Florida model, but has similar objectives in that the model’s output reflects a fully allocated cost, incorporates the potential for direct subsidies directed at particular users, and computes adjustable rates based on various scenarios. The model is capable of computing a rate per mile, rate per hour, or rate per passenger.

Similar to the Florida model, users must enter budget data in order for the model to compute fully allocated costs of service provision. The model then uses the cost allocation methodology originally developed by Price Waterhouse for the Federal Transit Administration and then adopted for use in by the Multi-State Technical Assistance Program of the American Association of State Highway and Transportation Officials.

The NCDOT model provides several output variables that are used in the cost allocation process. Transit systems can then use these fully allocated rate factors to compute the cost of any service provided to a human service as long as management can estimate the number of vehicle hours and vehicle miles that will be consumed in the service. Users can then convert the fully allocated cost of service into a price or rate for service by selecting from a series of menu driven choices

NCDOT has adopted a policy where grant funds used to support the administration of community transportation programs should be used to discount the rate charged to human services agencies that purchase service from the transit provider. Thus, some options on the treatment of subsidies, designed to lower costs to purchasers, is incorporated into the model. NCDOT has required use of this modeling process since FY 2002.





# Chapter 9. Recommendations for Improving Coordination of Special Needs Transportation Programs

The following recommendations are intended to help develop a coordinated transportation service delivery system that results in the following outcomes:

- Improved access to transportation services for customers
- Provision of more mobility options, especially in rural areas
- Development of a coordination infrastructure that responds to local circumstances and needs
- Removal of barriers to allow for a more flexible and efficient approach in delivering services
- Broadening human service and transit agency participation in a community-based coordination program
- Establishment of policies and procedures to advance coordination at both the state and local levels

## **1. Strengthen ACCT's Role as Statewide Oversight Body**

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One of the key lessons learned from best practice or model programs established elsewhere in the country is that an effective coordination structure is rooted both at the state level and at the local level. As described in Chapter 7, model programs employ and reflect both a “top down” and a “bottom-up” approach. The majority of stakeholders consulted during this project support the continuation of ACCT. At the same time significant steps are needed to enhance ACCT's effectiveness and to more clearly direct it to assume a statewide leadership and oversight role. This step is needed to effectively implement a bi-level coordination structure.

The following recommendations would provide clear guidance and empower ACCT to effectively promote coordination at the statewide level.

### **1(a) Clarify ACCT's tasks and responsibilities as follows:**

- Establish statewide objectives for providing special needs transportation services.
- Identify barriers inhibiting the coordination and accessibility of transportation services and aggressively pursue the elimination of these barriers.
- Create a statewide infrastructure for oversight of use of local, state and federal funding dedicated for special needs transportation.
- Execute Memoranda of Understanding with agencies using state funds to purchase transportation for their clients.
- Contract with local Community Access Managers (See Recommendations 2 b-e)
- Serve as a clearinghouse for information about transportation services, training, funding sources, innovations, and coordination efforts.

- Provide incentive funding to assist coordination efforts and fund pilot projects.

**1 (b) Reassess ACCT Membership:** Consideration should be given to ACCT's membership to ensure that it adequately reflects representation of all special needs constituency groups, including older adults, youth, persons with disabilities, and low-income persons. As such, there may be interest in expanding ACCT's membership to reflect a broader base of member participation. Care should be taken to ensure that the membership is comprehensive but of a manageable size.

**1 (c) Diversify ACCT Leadership:** Currently, ACCT is housed within the Department of Transportation, and its bylaws call for it to be chaired by the Secretary of Transportation or a designee, and staffed by DOT. Such an arrangement is limiting in that it does not allow for cultivating leadership among other agency representatives which, in the long run, could benefit ACCT. The ACCT chair and/or other officers should be selected by its members.

**1 (d) Re-Locate ACCT:** To promote independence and autonomy, ACCT should not affiliate itself or be housed with one partner agency. Such independence reinforces ACCT's stature as a statewide agency or commission ultimately serving the Governor and the legislature. Potential options for housing ACCT are the Governor's office, or with the Department of Community, Trade & Economic Development (CTED), which already houses and supports numerous statewide commissions and councils.

**1 (e) Provide adequate funding:** Resources should be available to support full time staffing needed to carry out ACCT's mission. Agencies whose clients are served through this infrastructure should contribute to share in the support of ACCT.

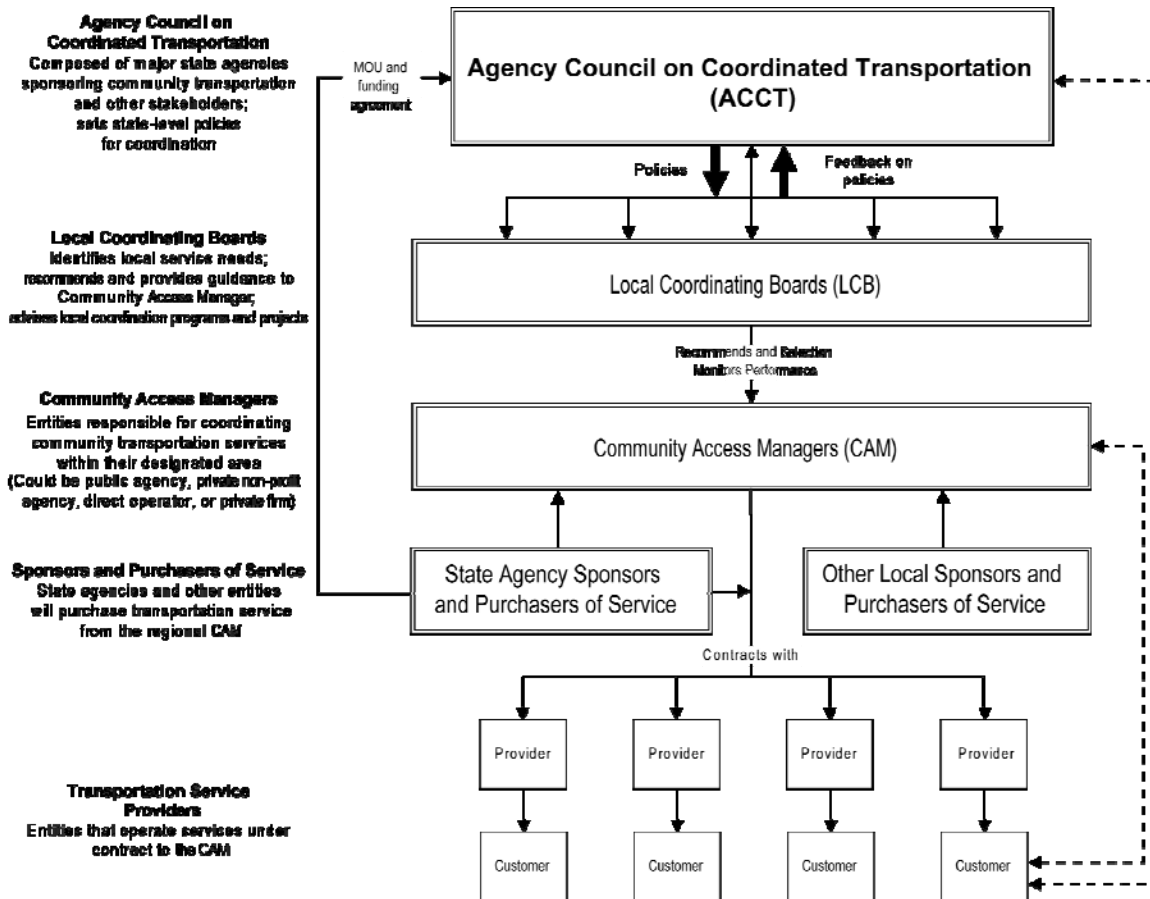
## 2. Establish Local Coordinating Boards and Community Access Managers

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Chapter 7 examined in detail some best practices with respect to bi-level coordination, and how these best practices might be replicated in Washington State. These best practices offer real-life examples of how coordination efforts are directed by the state and carried out at the local level. These serve to illustrate that there is no single model that works. Ultimately, it will be up to the State of Washington stakeholders to craft a local infrastructure that both allows for local input and policy direction, and for consistent oversight at the state level. In addition to strengthening coordination oversight at the statewide level, the following steps are recommended for the local level:

- Establish a Local Coordinating Board (LCB) in each region to (a) recommend the designation of the Community Access Manager (CAM), (b) to monitor its performance, and (c) to advance coordination initiatives and programs within the region.
- Designate a Community Access Manager for each region to operate and/or coordinate community-based transportation services within its designated area.

The following chart graphically portrays the structure proposed for Washington, including the relationship of ACCT with the newly established Local Coordinating Boards and Community Access Managers. It also characterizes the role of state agencies and local providers in providing services to the special needs customer.



- 2 (a) Use Medicaid service areas when defining regions:** The Medicaid regions provide the most logical geographic boundaries for a region. In the long term, however, ACCT may want to consider redefining the regions to better align with transportation planning regions. Using Medicaid geographic boundaries would minimize potential service disruption and facilitate other changes anticipated to the Medicaid NEMT program.
- 2 (b) Select CAMs through a competitive procurement process:** Procurement specifications should be structured in such a way as to encourage responses from public agencies, transit agencies, private non-profits, or private contractors—all of whom could potentially serve in this capacity, depending on the direction provided by the Local Coordinating Board (LCB). The procurement processes for selecting the CAMs should be consistent throughout state; however, each solicitation could be tailored as needed to address local circumstances.
- 2 (c) Incorporate agency specifications and expectations in RFPs:** Agencies purchasing transportation through the CAM (i.e. Medicaid and/or other state agencies) should be able to specify the level and type of services needed to serve their clientele.
- 2 (d) Direct ACCT directly, or by delegation, to oversee the selection process for the CAM.** Major purchasers of service should participate in the selection process, as well as other stakeholders representing the LCB.
- 2 (e) Authorize ACCT to contract with CAMs:** It is envisioned that ACCT, in its new role, would contract with each CAM; currently, there are 13 regions and there would be 13 such agreements in place, unless or until the regions are redefined.

### **3. Promote Coordination of Public Transit and Medicaid Services**

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This report has pointed out both opportunities and challenges with better coordinating public paratransit and Medicaid NEMT services. These two programs account for the greatest expenditures within the State of Washington for providing services to special needs populations; yet, they operate separately despite (anecdotal) evidence that their services are often redundant. It is important to note that it is not always feasible—or appropriate—to group customers from these two programs on the same vehicle; however, there will be some cases where this does make sense and should be pursued.

The following recommendations are intended to advance the notion that, as in other states, at least some public paratransit and Medicaid trips can be shared.

**3 (a) Direct ACCT and DSHS to develop and implement a pilot project to demonstrate cost-sharing of public paratransit and Medicaid NEMT trips.**

The Common Ground Project examined the feasibility of coordinating Medicaid and public transit trips in Pierce County off and on for over thirteen years. If easy solutions were at hand, more progress would have occurred. Despite these setbacks and remaining challenges, it is worth the effort to continue seeking a breakthrough, although it may make sense to do so in another part of the state.

The following steps would be needed:

- **Document client overlap:** There is a lack of solid data to indicate the extent to which clients among the two groups overlap. This is an important first step in determining whether trips and costs can be shared. Agreements can be executed to address confidentiality issues.
  - **Assess trip patterns:** Transit agencies and brokers would identify common trip origins and destinations in an effort to group or share client trips on a single vehicle, rather than providing two separate trips.
  - **Define cost-sharing arrangement:** While difficult, partners in the Common Ground Project did, in theory, reach agreement on a methodology for sharing the cost of trips among multiple agencies. There are a variety of methods that could be used, including the method agreed to in Pierce County.
  - **Implement cost-sharing arrangement:** One reason the Common Ground Project did not reach fruition is because the methodology, although agreed to in concept, could not be automated. In that case, a special software program needs to be developed to be able to implement the cost-sharing formula. Other types of agreements, however (such as a sampling of trip costs) do not require extensive software development.
  - **Develop compatible scheduling software programs:** One barrier to coordinating Medicaid with other trips is that the broker and transit operator may not have the same scheduling software programs. Efforts should be taken to either revise the current programs to ensure their compatibility, or to jointly purchase new programs.
- 3 (b) Certify transit operators as Medicaid service providers:** There are very few cases in Washington where the public transit operator serves as a provider for the Medicaid program. Efforts should be taken to ensure that the public paratransit program is certified as an eligible provider, and can seek reimbursement, consistent with Medicaid guidelines, for trips it provides. These guidelines specify that, if the trip provided is consistent with and could otherwise be considered an ADA paratransit trip, that Medicaid will reimburse the transit agency the “usual and customary” rate that the customer would otherwise pay, or up to twice the fixed route fare. If the trip provided is above and beyond the minimal ADA service standards (i.e. beyond the designated service area), then the broker can negotiate a reimbursement rate.
- 3 (c) Encourage public transit operators to purchase trips from the community broker:** As has been pointed out, most “Medicaid” brokers wear several hats, and provide a variety of services under contract to other agencies, including public transit agencies. This practice of contracting with the public transit agency is not widespread, however, and is the exception rather than the rule. It would behoove transit agencies to examine the feasibility of making use of the provider network available through the brokerage and to consider purchasing some trips it can’t provide directly.
- 3 (d) Explore the feasibility of expanding the Medicaid program beyond the provision of medical trips:** Some states (for example, Oregon) have expanded their Medicaid programs to provide trips other than for medical purposes on the rationale that providing such “lifeline” service can prevent more expensive nursing home or institutional costs. Some people would be able to stay longer in their homes if they are able to have transportation assistance for grocery shopping, social service

appointments, etc. Should Washington be successful in adapting its own program accordingly, public transit can help provide additional capacity that may be needed to expand the program.

- 3 (e) Test, through a pilot project, the feasibility of capturing the value of Medicaid trips provided by public transit agencies for which they are not currently reimbursed as match to federal Medicaid dollars:** An interesting concept has been raised by several stakeholders in the course of conducting this project—that of capturing the value of Medicaid trips provided by public transit operators and considering that value as match to the federal dollars. Such a concept, if successful, could reduce the State’s general funds needed for the match, thereby freeing those dollars for additional service to meet documented unmet needs. In theory, this approach is plausible, but would require planning, testing, and careful documentation in order to ensure its acceptance by the federal Medicaid administration.

#### **4. Establish and Use Uniform Definitions and Reporting Requirements**

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Case study examples have shown that states with successful models of coordination recognize that cost accounting and cost allocation are integral components in meeting the statutory obligations of the varied funding sources that may be used to support the purchase of service of client transportation from public transportation service providers.

- 4 (a) Establish common service definitions:** At a minimum, ACCT should establish common definitions for units of service, such as vehicle miles, vehicle hours, passenger trip, etc. FTA’s Uniform System of Accounts (USOA) used for National Transit Database reporting provides a good starting place to establish such definitions.
- 4 (b) Require ACCT members and CAMs to use common definitions:** Reaching agreement on common definitions is only beneficial if they are used. ACCT members and local CAMs should be required to use definitions agreed to.
- 4 (c) Develop uniformity in performance and cost reporting:** ACCT should develop, following the Florida and North Carolina best practices case studies, a model cost reporting and allocation tool that could be used by all providers in providing services under contract to third parties.
- 4 (d) Establish a single clearinghouse for driver background checks:** Currently, there are inconsistent requirements for pupil and public transportation programs when certifying drivers for their respective programs. The process for obtaining background checks is cumbersome and time-consuming. ACCT should work to streamline this process.

#### **5. Provide Adequate Funding to Support Coordination**

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Given the current economic climate of increased costs and declining revenues, it is not likely to expect that significant new sources of funding can be found to support ACCT activities or those initiated at the local level. The following recommendations, although modest, can serve as the foundation for advancing future efforts and are intended to reflect that all agencies that benefit

from coordination efforts should also contribute towards the costs associated with administering them.

- 5 (a) Require all state and local agencies that purchase special needs transportation contribute to the support of ACCT.** Contributions from member agencies can demonstrate a commitment to a broad-based coordination program, and not one that is solely sponsored by the WSDOT. A financial commitment is also more likely to ensure more ownership in the program's outcomes. This is a reasonable expectation given the benefits that participating agencies will realize.

This financial support can also help sponsor local coordination efforts. When ACCT did have funds available for this purpose, a number of coordination efforts were implemented. Since these funds are no longer available, new coordination efforts have stalled. Seed grants are often necessary for these efforts to "get over the hump." ACCT is the appropriate body to oversee a "coordination fund." For areas where a coordination process is already underway, even a small amount of incentive funding (usually matched with local funds) can help advance efforts or allow for implementation of priority projects.

- 5 (b) Prioritize use of federal transportation SAFETEA-LU funds for mobility management purposes to help support local coordination councils.** Four programs sponsored by Federal Transit Administration allow for the use of funds to develop "mobility management" programs. These funds are very appropriately directed to supporting local coordination efforts. While it is required that these funds be allocated based on a competitive selection process, WSDOT and other designated recipients of these federal funds can determine a priority for their use. Such projects are considered as "capital" expenditures, and as such require a lower match requirement (20% compared to 50% for an operating program).
- 5 (c) Direct WSDOT to tie the use of funds it oversees to advance coordination efforts.** Currently, WSDOT requires that use of federal and state funds it oversees be consistent with the development of locally developed coordinated public transit human services transportation plans. WSDOT should establish stronger coordination objectives for use of these funds to encourage participation in local brokers, and to encourage better coordination of Medicaid and public transit programs.
- 5 (d) Require any state agency purchasing transportation (excepting school districts) to (a) execute a Memorandum of Understanding (MOU) with ACCT, and (b) purchase transportation directly through the community transportation program.** These agencies would contract directly with the Community Access Manager to pay an administrative fee to cover overhead costs as well as a negotiated rate for the direct service.<sup>1</sup> The contract will incorporate a comprehensive scope of work to define service expectations and specifications as established by each participating agency.

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<sup>1</sup> Recently, ACCT reached agreement with DSHS that its administrations will report on transportation expenditures and services provided. This is a good first step towards building a baseline of information for potential participating agencies.

## 6. Improve Service Connectivity for Customers

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Customers often need to travel beyond county, city, or transit agency boundaries in order to get where they need to go. Connectivity among providers is important, and improvements should address travel for passengers both on fixed route and paratransit programs. It is most appropriate for connectivity improvements to be addressed at the regional level, under the purview of the Local Coordinating Board. Specifically, these steps could include:

**6 (a) Identify transit “hubs” and develop a connectivity plan for each:** Transit hubs or facilities used by multiple operators should be identified, and data collected to document their usage. Examples of such facilities may include Skagit Station, Everett Station, and virtually all of Sound Transit’s Regional T sites.<sup>2</sup> In some cases (i.e. Regional T) agreements have already been forged among participating operators to establish common procedures and to use regional transportation information systems. Where these agreements are not in place, or where there are inconsistent policies and procedures, a connectivity plan should identify improvements needed to enhance the usage of a transit hub.

**6 (b) Identify and adopt common connectivity standards.** Efforts to enhance connectivity are sometimes compromised because each individual operator has adopted its own logo, signage, fare system, etc. At places where multiple operators converge, efforts should be taken to adopt common connectivity standards, especially to coordinate schedules to allow for seamless transfers, and to allow for a coordinated fare structure so a customer does not have to carry multiple fare instruments. Signage is also an important feature to help customers, especially new transit customers, navigate their way through a facility that may be served by multiple providers.

**6 (c) Develop, test and implement technology that can promote connectivity:** Technology can be an effective tool in overcoming connectivity barriers. Some of these tools are still under development, such as the use of a “smart card” that will serve as a universal fare instrument among multiple participating agencies.

**6 (d) Eliminate artificial barriers that force transfers:** As pointed out in Chapter 2, transit operations within the State of Washington are supported 72% by local sales tax revenues. Local elected officials and transit board members, therefore, need to assure their customer base that local revenues are being used to support local services. At the same time, the case has been stated for the need for regionally-based trips, or those that require crossing service boundaries. Where “artificial” boundaries restrict the provision of such trips, the regional coordination council should work with local transit agencies to develop cost-sharing arrangements that may fairly and equitably promote transporting customers into each others’ service areas, and/or develop decisions policies for direct service for some trips or destinations.

**6 (e) Institute corridor service where demand justifies it:** A more efficient way to eliminate artificial boundary barriers is to develop more corridor-based service. This

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<sup>2</sup> Regional T is a network of transit hubs that was developed by Sound Transit and adopted by the transit partnership that includes Sound Transit, King County Metro, Pierce Transit, Everett Transit, Community Transit, Amtrak, Washington State Ferries, and the Washington State Department of Transportation.



service would be set up to provide more express-like service to major destinations. It should be noted that, in the absence of new revenue sources, establishing new corridor service would most likely result in cutting back other, more locally-based services.

## 7. Influence Facility Siting Practices

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Key findings that emerged in investigating how facilities serving special needs customers are sited include the following:

- Considering proximity to public transportation when making decisions on facility siting is often an after thought
- Public transit providers are often asked after the fact to provide service to new facilities

The following recommendations are intended to address these key findings and barriers.

- 7 (a) Take accessibility into account as an operating cost when comparing potential sites.** Traditionally capital costs and operating costs such as utilities are factored into a site decision. The costs of providing transportation services should also be considered. This practice could be developed by the state and used to educate private sector practitioners.
- 7 (b) Locate sites near a “cluster” of clients to ensure more efficient provision of Dial-a-Ride services.** This is already a practice of the state Employment Services Division, which studies local economic conditions before siting a Work Source Center.
- 7 (c) Provide state and local incentives for private sector facilities to locate near transit.** Seattle’s transit-oriented development (TOD) program serves as an excellent model for cities state-wide. CTED staff could work with local governments to develop similar programs.
- 7 (d) Review access to transit for all private sector human services facilities.** Local planning staff should review human services facilities for access to public transit as part of their development planning and permitting process. The state lacks jurisdiction over local planning, but this measure could be incorporated into the technical assistance and best practices education provided by CTED staff to local planners. It could also be formalized under the GMA.
- 7 (e) Review preferred location with transit provider before purchase/lease finalized.** The state’s Certificate of Need program represents a method for transit providers to be involved early in facility siting decisions. This program is intended to assess the market for large and expensive facilities, yet a less intensive review could be used for smaller developments. This could take the form of a “checklist” for applicants to the state Housing Trust Fund or state facilities licenses which would be required as part of the eligibility criteria.
- 7 (f) Provide more specific language defining “access to transit” in siting guidelines for state facilities.** While too much specificity can form a barrier to site selection, the current guidelines are so vague that they do not give preference to more ideal sites.

**7 (g) Make “access to transit” (defined) an eligibility guideline for state licenses and funds.** Parties developing human services facilities that utilize state funds, or require a state license to operate, are guided by criteria set by the state in order to qualify. For instance, transit access is reviewed for applicants seeking Affordable Housing Trust Fund grants, but the guidelines should be more specific. Site plans for facilities requiring operating licenses are reviewed, but only for on-site characteristics, not for location context such as transit access.

**7 (h) Reduce parking requirements for housing developments serving senior and low-income residents, and for transit oriented developments (TODs).** Parking requirements are a “driver” forcing human services facilities to peripheral locations that often lack transit or paratransit service. Such locations generate more trips by special needs transportation providers. The City of Seattle has addressed this issue by reducing minimum parking standards for affordable housing developments. This policy may serve as a model for other communities.

## **8. Enhance Coordination with Pupil Transportation**

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For reasons that have been cited in this report, it is not feasible to widely integrate pupil transportation and public transportation programs. There are some opportunities, however, that should be further investigated with respect to pupil transportation. These opportunities are described below.

**8 (a) Evaluate a wider use of community brokers to provide transportation for homeless students.** Currently, at least two Medicaid brokers (Hopelink and Paratransit Services) are contracting with school districts to provide for transportation for homeless students. Evaluate the cost-benefits realized by school districts by contracting these services. Such an analysis should also consider indirect cost savings realized by the district in that administrative and overhead costs are reduced.

**8 (b) Direct OPSI to require local districts to track their expenditures** for providing transportation for homeless students; currently, the extent of these costs is not known. Collecting cost and service data would help evaluate whether other options should be more aggressively pursued.

**8 (c) Evaluate use of capital resources (school buses) when they are not being used for school purposes.** Existing state statute (RCW 28A.160.080) already allows for such use:

*“In addition to the right to contract for the use of buses provided in RCW 28A.160.080 and 28A.160.090, any school district may contract to furnish the use of school buses of that district to other users who are engaged in conducting an educational or recreational program supported wholly or in part by tax funds or programs for elderly persons at times when those buses are not needed by that district and under such terms as will fully reimburse such school district for all costs related or incident thereto: PROVIDED, HOWEVER, That no such use of school district buses shall be permitted except where other public or private transportation certificated or licensed by the Washington utilities and transportation commission is not reasonably available to the user.”*

Although the provision exists to allow for use of school buses for other purposes, in reality it is rarely utilized. Ultimately, it is up to each local district, under the direction of a locally-elected school board, to set policies with respect to use of its own resources. Not all districts are willing or interested to consider the use of buses beyond their basic purpose, in part because of liability concerns, or that increased use of the vehicles will require them to be replaced sooner. Furthermore, because of the provision that buses cannot compete with private charters, their use is restricted. Buses in Mason County are used for multiple purposes, and there are probably other untapped opportunities to better coordinate the use of school resources for broader community purposes. These should be explored by each local coordination board.

## **9. Seek to Influence Federal Planning and Program Requirements**

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To a large extent, human service transportation programs discussed through this study are influenced through federal policies or regulations; transportation provisions established through ADA, McKinney-Vento, and Medicaid programs are all based on federal legislation. There may be opportunities to influence legislation affecting these or other human service programs when they are reauthorized.

- 9 (a) Include comparable planning requirements for human service agencies** as established for use of public transit funds authorized through SAFETEA-LU. Funding for three federal transportation programs are tied to the preparation of a coordinated transportation plan, but comparable requirements are not in place for human service agencies funding transportation. As these programs are reauthorized, efforts should be made to adopt similar planning requirements that tie the use of their funds to coordinated planning.
- 9 (b) Advocate for funding to support transportation programs required through the McKinney Vento Act.** The responsibility to provide and fund transportation for homeless students has been directed to the local (school district) level without additional resources. It would behoove ACCT and its partners to participate in and be aware of other advocacy efforts or proposed regulatory and/or policy revisions when the McKinney Vento Act is reauthorized.
- 9 (c) Support federal legislation that would increase the reimbursement rate authorized for volunteers.** S.3429, the Giving Incentives for Volunteers Everywhere (GIVE) Act of 2008, has been introduced with bi-partisan support to address the impact of high gas prices on charitable volunteers. The bill does two things:
- Deduction Rate:* The bill would raise the volunteer standard deduction rate from the current 14 cents per mile to 70 percent of the standard business deduction rate. This would set the rate at 41 cents/mile and the rate would be adjusted annually.
- Reimbursement:* The bill would exempt from taxable income reimbursements from charities for mileage traveled by a volunteer up to the business rate (currently 58.5 cents/mile)
- 9 (d) Expand funding programs to be subject to Coordinated Public Transit Human Services Transportation Plans.** When SAFETEA-LU is reauthorized (currently authorized through 2009), tie the use of Sections 5311 (rural transportation) and 5311 (c) (tribal transportation program) to the development of a coordinated plan.



## Chapter 10. Next Steps

Chapter 9 presents a series of recommendations to promote coordination of special needs transportation programs in Washington State. In some cases, a range of options is suggested for implementing recommendations; it is important to note that there is not a single best way to move forward. It will be up to Washington State special transportation needs stakeholders, especially members of ACCT, local coordination councils, Community Transit Association of America Northwest (CTAA NW), WSDOT, DSHS, OSPI, and others to weigh in on **how** best to advance these efforts.

It is also important to recognize that establishing local priorities will differ around the state. As such, key players tasked with implementation may also differ—many regions with effective non-profit agencies are already playing a role in service delivery and in promoting coordination while in other regions, service providers such as transit agencies may be best equipped to expand their role and take on new responsibilities.

Figure 10-1 provides an overview of the recommendations, and suggests a lead entity and a timeframe to implement them. Should these recommendations be endorsed by members of the legislature and/or other stakeholders authorized to implement them, the next step would be to develop a comprehensive implementation plan that is phased in incrementally, allows for flexibility and adaptability to best meeting local circumstances, and designates a champion (or champions) responsible to carry out the recommendations at both the state and local levels.

A proposed timeframe is also suggested to guide implementation efforts. An immediate objective would be for legislative action to establish the recommended bi-level structure, including clarification of ACCT's role, and concurrence to designate Community Access Managers (CAMs). At the same time, state agencies could be directed to purchase transportation through the CAMs, and contribute to ACCT. Subsequent tasks and activities would build upon that initial step. It is suggested that such legislative action occur prior to or to coincide with ACCT's reauthorization. Those activities associated with a "short-term" timeframe, then, are assumed to be initiated in the 2009-2010 timeframe.

Other activities, such as designating CAMs, would most likely be phased in incrementally and may take several years to reach full fruition. Yet other activities are ongoing in nature, or are independent of initial legislative action.

**Figure 10-1 Summary of Recommendations and Implementation Timeframe**

Recommendation	Lead Entity	Timeframe
<p><b>1. Clarify ACCT's Role as Statewide Oversight Body</b>                      Designate ACCT as the statewide oversight body with regulatory authority to set policy direction and to provide oversight of statewide special needs transportation coordination efforts.                      Subtasks include:</p> <ul style="list-style-type: none"> <li>a) Clarify ACCT's tasks and responsibilities</li> <li>b) Reassess ACCT Membership</li> <li>c) Diversity ACCT Leadership</li> <li>d) Re-Locate ACCT</li> <li>e) Provide adequate funding to ACCT</li> </ul>	<p>Legislative action to clarify ACCT's role and authorize bi-level coordination structure</p> <p>ACCT to assess membership, evaluate housing options</p> <p>Legislative action to require participating agencies to contribute to ACCT</p>	<p>Short-term (prior to ACCT "sunset" June 30, 2010.)</p> <p>Short-term, upon Legislative action</p> <p>Short-term</p>
<p><b>2. Establish Community Access Managers and Local Coordinating Boards:</b></p> <ul style="list-style-type: none"> <li>• Local Community Access Manager to coordinate and provide special needs transportation services within its designated service area.</li> <li>• Local Coordinating Board to recommend designation of CAM, monitor its performance, advance coordination within its service area.</li> </ul> <p>Subtasks include:</p> <ul style="list-style-type: none"> <li>a. Use Medicaid service areas when defining regions</li> <li>b. Select CAMs through competitive procurement process</li> <li>c. Incorporate purchasing agencies' specifications in RFP</li> <li>d. Direct ACCT to direct or delegate procurement process</li> <li>e. Authorize ACCT to contract with CAMs</li> </ul>	<p>Legislative action to authorize bi-level coordination structure</p> <p>ACCT, in partnership with DSHS, to develop procurement procedures</p>	<p>Short-term to authorize structure</p> <p>Medium-Long term (1-3 years) to implement CAMs; Phase-in recommended</p>
<p><b>3. Promote Coordination of Medicaid and Public Paratransit Programs</b></p> <p>Subtasks include:</p> <ul style="list-style-type: none"> <li>a) Direct ACCT and DSHS to develop and implement a pilot project to demonstrate cost-sharing of public paratransit and Medicaid NEMT trips.</li> <li>b) Certify transit operators as Medicaid providers</li> <li>c) Encourage transit operators to purchase service from CAMs</li> <li>d) Explore the feasibility of expanding the Medicaid program beyond the provision of medical trips</li> <li>e) Test, through a pilot project, the feasibility of capturing the value of Medicaid trips provided by public transit agencies for which they are not currently reimbursed as match to federal Medicaid dollars</li> </ul>	<p>DSHS and ACCT in partnership to develop and sponsor two pilot programs</p> <p>Local CAMs and local transit agencies to certify transit agencies as Medicaid providers</p> <p>DSHS and ACCT to sponsor research to test feasibility of expanding Medicaid program and assess cost-benefits</p>	<p>Short-Medium term</p> <p>Medium-term, upon establishment of CAMs; arrangement could be initiated sooner with current Medicaid brokers</p> <p>Medium-term</p>

Recommendation	Lead Entity	Timeframe
<p><b>4. Establish Uniform Definitions and Reporting Requirements</b></p> <p>Subtasks include:</p> <ul style="list-style-type: none"> <li>a) Establish common service definitions</li> <li>b) Require ACCT members and CAMs to use common definitions</li> <li>c) Develop uniformity in performance and cost reporting</li> <li>d) Establish a clearinghouse for driver background checks</li> </ul>	<p>ACCT</p>	<p>Medium-term; upon clarity of ACCT's roles and development of implementation plan</p>
<p><b>5. Provide Adequate Funding to Support Coordination</b></p> <p>Subtasks include:</p> <ul style="list-style-type: none"> <li>a) Require all state and local agencies that purchase special needs transportation contribute to ACCT</li> <li>b) Prioritize use of federal transportation SAFETEA-LU funds for mobility management purposes to help support local coordination councils.</li> <li>c) Direct WSDOT to tie the use of funds it oversees to advance coordination effort.</li> <li>d) Require any state agency purchasing transportation (except school districts) to execute a Memorandum of Understanding (MOU) with ACCT, and purchase transportation directly through the community transportation program</li> </ul>	<p>Legislature to require state agencies to contribute to ACCT</p> <p>WSDOT to prioritize use of funds for mobility management purposes, revise policies to direct competitive grant funds to support coordination efforts</p> <p>Legislature to require agencies to purchase services through local programs</p>	<p>Short-term; with legislative action described above</p> <p>Short-term, with implementation to coincide with WSDOT grant cycle</p> <p>Short-term, with legislative action described above</p>
<p><b>6. Improve Service Connectivity for Customers</b></p> <p>Subtasks include:</p> <ul style="list-style-type: none"> <li>a) Identify transit "hubs" and develop a connectivity plan for each</li> <li>b) Identify and adopt common connectivity standards</li> <li>c) Develop, test and implement technology that can promote connectivity</li> <li>d) Eliminate artificial barriers that force transfers</li> <li>e) Institute corridor service where demand justifies it</li> </ul>	<p>Local Coordinating Boards, transit agencies, guidance from ACCT</p>	<p>Medium-term; planning effort to be assessed at local level by LCB</p>
<p><b>7. Influence Facility Siting Practices</b></p> <p>Subtasks include:</p> <ul style="list-style-type: none"> <li>a) Take accessibility into account as an operating cost when comparing potential sites</li> <li>b) Locate sites near a "cluster" of clients to ensure more efficient provision of Dial-a-Ride services</li> </ul>	<p>Local Governments</p> <p>General Administration</p>	<p>Ongoing</p> <p>Ongoing</p>
<ul style="list-style-type: none"> <li>c) Provide state and local incentives for private sector facilities to locate near transit</li> </ul>	<p>General Administration, Local Governments</p>	<p>Ongoing</p>

Recommendation	Lead Entity	Timeframe
d) Review access to transit for all private sector human services facilities	CTED, Local Governments	Short-term
e) Review preferred location with transit provider before purchase/lease finalized	CTED, Local Governments	Short-term
f) Provide more specific language defining “access to transit” in siting guidelines for state facilities	Local Government	Ongoing
g) Make “access to transit” (defined) an eligibility guideline for state licenses and funds	General Administration	Short-term
h) Reduce parking requirements for housing developments serving senior and low-income residents, and for transit oriented developments (TODs).	CTED, DOH, DSHS	Medium-term
<p><b>8. Enhance Coordination with Pupil Transportation</b>                      Subtasks include:</p> <p>a) Evaluate a wider use of community brokers to provide transportation for homeless students</p> <p>b) Direct OPSI to require local districts to track their expenditures for homeless students</p> <p>c) Evaluate use of capital resources (school buses) when they are not being used for school purposes</p>	<p>OSPI, CAMs, ACCT to assess use of brokers for providing transportation for homeless students</p> <p>OSPI to direct local districts to track expenditures</p> <p>OSPI, LCB, ACCT</p>	<p>Medium-term</p> <p>Short-term</p> <p>Short-term</p>
<p><b>9. Seek to Influence Federal Planning and Program Requirements</b>                      Subtasks include:</p> <p>a) Include comparable planning requirements for human service agencies as established for use of public transit funds authorized through SAFETEA-LU</p> <p>b) Advocate for funding to support transportation programs required through the McKinney Vento Act</p> <p>c) Support federal legislation that would increase the reimbursement rate authorized for volunteers.</p> <p>d) Expand funding programs to be subject to Coordinated Public Transit Human Services Transportation Plans</p>	<p>Legislature, ACCT, LCBs to track, monitor, develop position and communicate positions on federal plans and requirements</p>	<p>Ongoing: as programs are reauthorized</p>



## GLOSSARY OF TERMS

### **ACCT**

Agency Council on Coordinated Transportation (ACCT) is a Council of State agencies, transportation providers, consumer advocates, and legislators with the mission to:

- Promote the coordination of special needs transportation
- Provide a forum for discussing issues and initiating change
- Provide oversight and direction to the state's coordination agenda
- Report to the legislature and propose legislative remedies

### **Accessibility**

The extent to which facilities, including transit vehicles, are barrier-free and can be used by people who have disabilities, including users of wheelchairs and other mobility devices. Accessibility also refers to making information available in alternative formats for persons who are visually impaired.

### **Administration on Aging (AoA)**

The agency within the U.S. Department of Health and Human Services that oversees the implementation of the Older Americans Act, including senior nutrition programs, senior centers and supportive services for elders.

### **Americans with Disabilities Act (ADA)**

Passed by Congress in 1990, this act mandates equal opportunities for persons with disabilities in the areas of employment, transportation, communications and public accommodations. Under this Act, transportation providers are obliged to ensure their fixed-route vehicles (and key rail stations) are accessible for persons in wheelchairs. Public transit providers also must supplement their fixed-route services with ADA Complementary Paratransit Services for those persons unable to use fixed-route service because of their disability.

### **ADA Complementary Paratransit Service**

Specialized demand-responsive service provided for people who cannot use fixed-route transit or rail service due to a disability, and meeting specific requirements as established under the Americans with Disabilities Act. The service is considered “complementary” because it is provided, at a minimum, where and when the fixed route service is provided, and because it complements fixed-route service in providing service needed to make the entire system usable by people with disabilities.

### **Brokerage**

A transportation brokerage provides a point of transportation access for one or more sponsoring funding organizations and purchasers of service. The broker also manages a complex service delivery network, assigning trips -- either directly or indirectly (by way of service design) -- to carriers.

Brokers may also perform or be responsible for additional functions more typically associated with funding agencies, such as eligibility determination, trip ticket/scrip sales management, carrier/service monitoring, and carrier invoice processing.

## **Capital Costs**

Refers to the costs of long-term assets of a public transit system such as property, buildings and vehicles.

## **Common Ground**

A pilot project in Pierce County that investigated potential efficiencies of combining scheduling of transit ADA and Medicaid-eligible brokered passenger trips. The project was discontinued in 2008.

## **Community Transportation Service**

Specialized, demand-responsive services that are available to the general public, specific populations (e.g., older adults, persons with disabilities, and/or persons on limited income), and/or clients of sponsoring human service agencies. Community transportation services are typically categorized into two groupings:

1. ADA complementary paratransit services or municipal-sponsored dial-a-ride services for the general public or for target populations mentioned above; and
2. Human service transportation programs

## **Consolidation**

Restructuring transportation services to serve the same market with fewer service providers (and sometimes only one provider).

## **Coordination**

A process through which two or more organizations interact jointly to accomplish transportation objectives that benefit each participating organization, usually for the purpose of achieving greater cost-efficiencies in service provision through economies of scale, and/or eliminating or reducing duplication of services. Participating organizations are able to stretch their funding dollar in order to accommodate under-served demand and/or expand service to address service gaps. Coordination models vary from very simple to very complex efforts. Some examples include joint purchasing; shared use of facilities, training or maintenance, co-mingling trips on common contracted carriers, brokerages, and consolidated transportation service providers.

## **Cost Efficiency**

Cost efficiency for demand-responsive systems is usually measured in terms of average cost per trip, although it can also be measured in terms of cost per mile, and for Dedicated Service, cost per hour. The lower the cost per trip, the more cost efficient the system. Service Productivity, typically measured as average trips per hour, can serve as a surrogate measure for cost efficiency but is usually only for Dedicated Service.

## **Co-Mingling of Trips**

Typically refers to clients of more than one agency sharing a single vehicle, or ride-sharing of trips sponsored by different funding sources.

## **Cost sharing**

A funding arrangement where more than one agency financially supports the direct provision of transportation or other supportive services.

## **Curb-to-Curb Service**

A level of service or passenger assistance for **Demand-Responsive Service**, in which pick-ups and drop-offs are performed at the curbside or roadside nearest their origin and destination. Passenger assistance is not provided other than for actual boarding and alighting.

## **Dedicated Service**

This is a transportation service in which the vehicles in operation are exclusively used to transport customers of the transportation program (or coordinated set of programs) during a specified period of time.

## **Demand-Response Service**

A type of transit service where individual passengers can request transportation from a specific location to another specific location at a certain time. Transit/paratransit vehicles providing demand-response service often do not follow a fixed route, but travel throughout the community transporting passengers according to their specific requests. These services usually, but not always, require advance reservations.

## **Department of Social and Health Services (DSHS)**

The Department of Social and Health Services oversees the social services provided to the citizens of Washington State. There are six administrations that handle the diverse range of services, including Medicaid services.

## **Deviated Fixed Route Service**

This type of transit is a hybrid of fixed-route and demand-response services. A bus or van passes along fixed stops and keeps to a timetable, but can deviate from its course between two stops to go to a specific location for a pick-up or drop-off that is requested (typically in advance). In some systems, deviations may be requested by any rider; in other systems, only by specific populations (such as older adults or persons with disabilities). The area (and sometimes, times) allowed for deviations is often limited

## **Dial-a-Ride Service**

A name that is commonly used for demand-responsive service. It is most often used to describe a demand-responsive service that is available to the general public.

## **Door-to-Door Service**

A form of demand-responsive service that includes passenger assistance between the vehicle and the door of his or her home or other destination. Door-to-door service provides a higher level of assistance than curb-to-curb service, yet not as much as “door-through-door” service, in which the driver actually provides assistance within the origin or destination. This term is sometimes used loosely as a synonym for demand-responsive service.)

## **Federal Transit Administration (FTA)**

A component of the U.S. Department of Transportation that regulates and helps fund public transportation. FTA provides financial assistance for capital and operating costs and also sponsors research, training, technical assistance and demonstration programs.

## **Feeder Service**

This includes fixed-route, flex-route, and/or demand-responsive service that provides service to/from stops on a trunk bus line or rail service. ADA complementary paratransit service may be used as feeder service for ADA paratransit trips.

## **Fixed-Route Transit Services**

Transit services in which vehicles run on regular, pre-designated, pre-scheduled routes, with no deviation. Typically, fixed-route service is characterized by printed schedules or timetables, designated bus stops where passengers board and alight and the use of larger transit vehicles. Entities that operate fixed-route public transit are obligated to also provide ADA complementary paratransit service.

## **Human Service Agencies (also called Social Service Agencies)**

A public or private, not-for-profit organization that provides services for essential needs such as medical care, income support, housing, education, training, and public health, typically targeting populations such as older adults, person with disabilities, and/or individuals with limited incomes.

## **Job Access and Reverse Commute Program (under FTA Section 5316)**

A federal funding program for work-related transportation for low-income individuals, originally authorized in the TEA-21 transportation funding act, and reauthorized through SAFETEA-LU. The purpose of this grant program is to develop transportation services designed to transport welfare recipients and low income individuals to and from jobs and to develop transportation services for residents of urban centers and rural and suburban areas to suburban employment opportunities. Valid trip purposes not only include jobs themselves, but educational and/or training sites that directly lead to employment. SAFETEA-LU requires that the distribution of funds under Section 5316 be coordinated with the distribution of funds under Section 5310 and 5317 through a locally-coordinated planning process.

## **Medicaid Non Emergency Medical Transportation (NEMT)**

A health care program for low-income and other medically needy persons, jointly funded by state and federal governments. The Medicaid program pays for transportation to non-emergency medical appointments if the recipient has no other means to travel to the appointment. In Washington, Medicaid-sponsored non-emergency medical transportation (NEMT) is arranged through regional brokerages under contract to the DSHS.

## Metropolitan Planning Organizations (MPO)

The organizational entity designated by law with lead responsibility for developing transportation plans and programs for urbanized areas of 50,000 or more in population. MPOs set coordination standards and manage processes for selecting projects to be funded through federal transportation programs.

## New Freedom Program (under FTA Section 5317)

A new program under the SAFETEA-LU federal transportation funding act, New Freedom is intended to provide capital and operating funding for service and facility improvements that go beyond those required by the ADA in addressing transportation needs of persons with disabilities. The New Freedom formula grant program aims to provide additional tools to overcome existing barriers facing persons with disabilities seeking integration into the work force and full participation in society. Examples of new public transportation services beyond the ADA include spatial or temporal expansion of service beyond what is required, the provision of same-day service; door-through-door service; vehicles and equipment that accommodate larger mobility aids; feeder services; accessibility improvements at non-key stations; and travel training. Examples of new *alternatives* include purchasing of accessible vehicles for new accessible taxi, ridesharing and/or vanpooling programs; administration of new voucher programs; supporting new volunteer driver/aide programs; and supporting new mobility management and coordination programs among public transportation providers and other human service agencies providing transportation.

## Non-Dedicated Service

This is a transportation service in which the vehicles in operation are **not** used exclusively to transport customers of a transportation program (or coordinated set of programs). The drivers and vehicles of non-dedicated services are free to transport other riders, e.g., from the general public or from other contracts. An example of non-dedicated service is taxis. Non-dedicated service can be used in conjunction with **Dedicated Service** to efficiently accommodate demand during peak periods and other situations where the use of additional dedicated vehicles may not be as cost efficient.

## Older Americans Act (OAA)

Federal law establishing a network of services and programs for older people. This network provides supportive services, including transportation and nutrition services, and works with public and private agencies that serve the needs of older individuals. Transportation funding available through the OAA is also known as Title IIIB funding.

## Operating Assistance

Funding that helps support the day-to-day costs of operating or providing services; in transportation settings, this category often includes driver salaries and operating staff expense, as well as fuel, and other routine, ongoing costs of having and operating a transportation service.

## Operating Costs

Non-capital costs associated with operating and maintaining a transit system, including labor, fuel, administration and maintenance.

## **Paratransit**

Types of passenger transportation that are more flexible than conventional fixed-route transit and as such are able to meet a variety of more specialized transportation needs. Paratransit includes demand-response transportation services, shared-ride taxis, carpooling and vanpooling, jitney services and other service models. This term is most often used to refer to wheelchair-accessible, demand-response van service.

## **Productivity**

A measure of the quantity of desired results produced per unit of resources applied. For **Demand-Response Services**, productivity is commonly measured as the average number of passenger trips per hour. Unfortunately, systems do not all define “passenger trips” and “hours” the same way. With some systems, passenger trips are defined as total (one-way) passenger-trips, including personal care assistants, companions, etc. In other systems, passenger trips include only trips made by program eligible passengers. As the denominator for the productivity calculation, most systems use “revenue vehicle hours” which the National Transit Database defines as the first pick-up to the last drop-off less breaks and not including deadheading to and from the vehicle storage facility.

## **Purchased Transportation**

A specific transportation service provided to a public agency by a public or private transportation provider based on a written contract.

## **Regional Transportation Planning Organization (RTPO)**

A Regional Transportation Planning Organization (RTPO) is formed through a voluntary association of local governments within a county or contiguous counties. RTPO members include cities, counties, WSDOT, tribes, ports, transportation service providers, private employers and others. RTPOs are required to:

- Prepare a Regional Transportation Plan
- Certify that countywide planning policies and the transportation element of local comprehensive plans are consistent with the Regional Transportation Plan
- Develop and maintain a six-year Regional Transportation Improvement Program

## **SAFETEA-LU**

The current federal funding act for surface transportation programs (including federal transit programs), providing funds over a six-year period through FY 2009. SAFETEA-LU requires that, as of FY 2007, projects funded with Section 5310, (capital for elderly and disabled persons), JARC (job access for low-income) and New Freedom Programs (improved mobility for disabled) be derived from a Coordinated Public Transit-Human Services Transportation Plan.

## **Section 5307**

The section of the Federal Transit Act that authorizes grants to public transit systems in urban areas. Funds authorized through Section 5307 are awarded to states to provide capital and operating assistance to transit systems in urban areas with populations between 50,000 and 200,000. Transit systems in urban areas with populations greater than 200,000 receive their funds directly from FTA. However, for these urban systems, operating assistance is not available.

## **Section 5309**

The section of the Federal Transit Act that authorizes discretionary grants to public transit agencies for capital projects such as buses, bus facilities and rail projects.

## **Section 5310**

See also **Transportation for Elderly Individuals and Individuals with Disabilities Program**. This section of the Federal Transit Act authorizes capital assistance to states for transportation programs that serve the elderly and people with disabilities. States distribute Section 5310 funds to local operators in both rural and urban settings, who are either public or nonprofit organizations or the lead agencies in coordinated transportation programs.

## **Section 5311**

The section of the Federal Transit Act that authorizes capital and operating assistance grants to public transit systems in areas with populations of less than 50,000.

## **Section 5316**

The section of the Federal Transit Act that authorizes funding under the **Job Access and Reverse Commute Program**.

## **Section 5317**

The section of the Federal Transit Act that authorizes funding under the **New Freedom Program**.

## **Subscription Service (also called Standing orders)**

Recurring individual or group trips served on a “standing order” basis. This type of service is frequently used to transport human service agency clients to regular agency programs. Some systems set a minimum number of subscription trips per week. The common trait of subscription trips is that they go to and from the same origin and same destination at the same time of day. This might include a daily work trip, a trip to a congregate meal site, or a regular Monday/Wednesday/Friday trip to a dialysis facility.

## **Temporary Aid to Needy Families (TANF)**

Created by the 1996 welfare reform law, TANF is a program of block grants to states to help them meet the needs poor of families. It replaces AFDC, JOBS, Emergency Assistance and some other preceding federal welfare programs. Program funds are often used to pay for transportation, child care and other barriers to workforce participation.

## **Transportation for Elderly Individuals & Individuals with Disabilities Program**

This section of the Federal Transit Act authorizes capital assistance to states for transportation programs that serve the elderly and people with disabilities. States distribute Section 5310 funds to local operators in both rural and urban settings, who are either public or nonprofit organizations or the lead agencies in coordinated transportation programs.

## **Trip**

A one-way movement of a person or vehicle between two points. Many transit statistics are based on “unlinked passenger trips,” which refer to individual one-way trips made by individual riders in individual vehicles. A person who leaves home on one vehicle, transfers to a second vehicle to arrive at a destination, leaves the destination on a third vehicle and has to transfer to yet another vehicle to complete the journey home has made four unlinked passenger trips.

## **2-1-1**

2-1-1 is the three-digit telephone number assigned by the Federal Communications Commission for the purpose of providing quick and easy access to information about health and human services.

## **U.S. Department of Health and Human Services (U.S. HHS)**

Funds a variety of human services transportation through the Administration on Aging (AoA), Head Start, Medicaid and other programs.

## **U.S. Department of Transportation (U.S. DOT)**

The principal direct federal funding and regulating agency for transportation facilities and programs. Contains the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA).

## **WSDOT**

Washington State Department of Transportation



