

## 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

---

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.

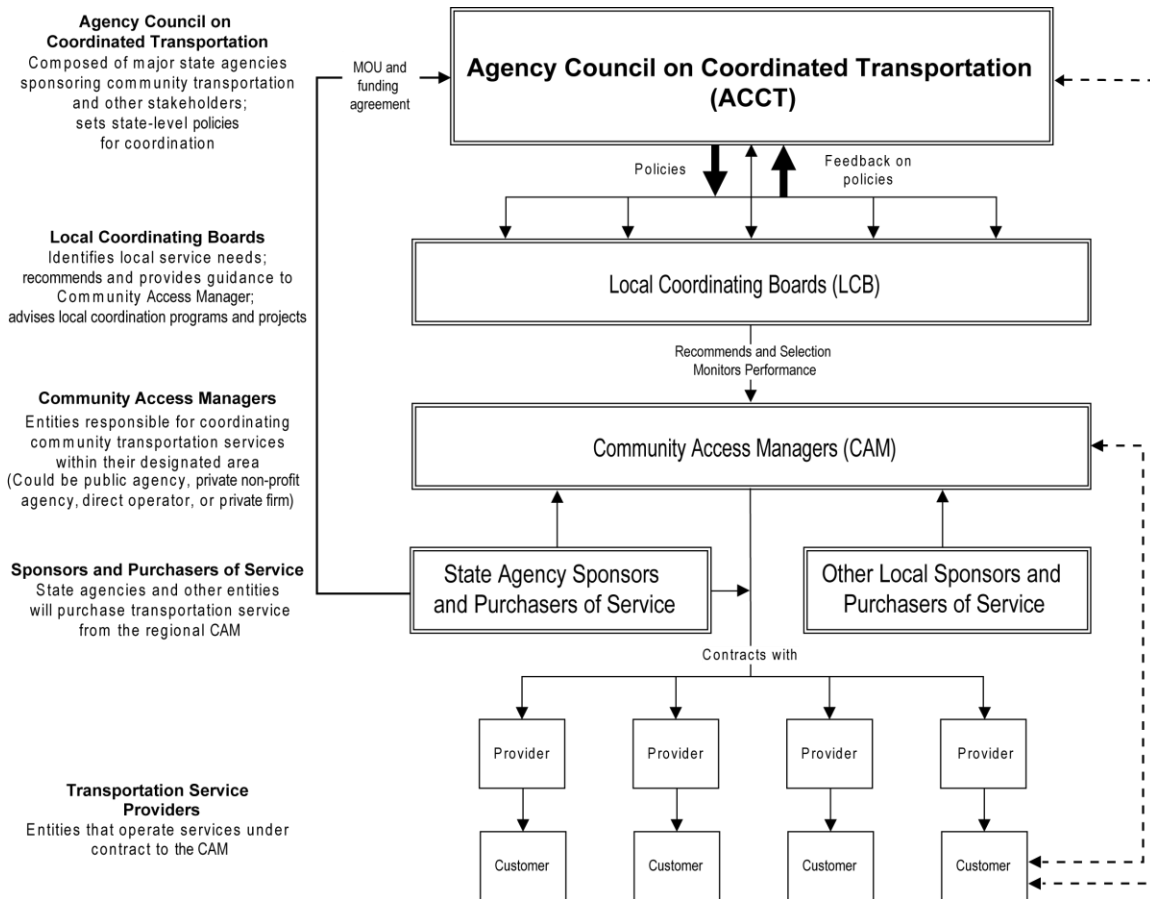
## 2. Establish Local Coordinating Boards and Community Access Managers

---

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**

---

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**

---

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**

---

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.

---

<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

---

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

---

<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**

---

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**

---

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

---

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.

