

September 15, 2021

Inez Evans
President & CEO
Indianapolis Public Transportation Corporation
1801 West Washington Street
Indianapolis, IN 46222



RE: Public Comment on Beyond ADA Draft Policy

Dear Ms. Evans,

Thank you for the opportunity to provide input on IndyGo's Beyond ADA (Americans with Disabilities Act) draft policy for new premium paratransit service. I am writing on behalf of Health by Design coalition partners and several individual and group stakeholders from whom we have gathered input. For the past 15 years, we have advocated for safe, accessible, affordable, and equitable transportation options that meet the needs of all Hoosiers, regardless of their age, ability, income, or how they choose to travel.

We have appreciated the opportunity to actively participate in these planning and policy discussions over the last few years and recognize the complexities of the issues and the influence and legacy of past leadership decisions. We look forward to ongoing discussions related to policy implementation and evaluation, as well as future refinements. These are our comments and questions:

- We are concerned by the reduced Span or Service Hours component and wonder if the data collected between November 2020 and March 2021 fully reflects overall and historic demand, given the COVID-19 pandemic.
 - Is earlier data available that could be referenced to confirm this 'relatively low demand'?
 - Moving forward, will requests outside the span of service be tracked (recognizing that such requests will be limited and decrease as people know/learn of the end times)?
- We expect that the proposed premium fare will be burdensome to many Beyond ADA riders, particularly those living in the most rural parts of the county, who may be older adults, people with disabilities, and those with limited income. Substantially increasing their transportation costs potentially limits their ability to meet basic needs, access services, and connect socially, thereby negatively impacting their overall health and well-being.
 - Can other funding and/or services be pursued to offset this premium fare for those with the greatest need?
- With regard to Capacity Constraints, we suggest the development of a policy on the specific parameters and rules to be used in determining trip denials to riders in the non-ADA area.
 - Capacity Constraints must be clearly determined and defined.
 - These determinations/decisions should not be made subjectively or by individual staff members, to ensure equitable application.
 - MAC members and other external stakeholders should be involved in developing this policy.
- We are excited to see the introduction of same-day service!
 - We propose including MAC members and other external stakeholders alongside IndyGo Mobility Solutions staff in the development of related policies and procedures.
 - These policies and procedures should clearly define allowable vehicle capacity and schedules.

- They must also consist of the specific rules/parameters that will determine same-day trip denials.
- These determinations/decisions should not be made subjectively or by individual staff members, to ensure equitable application.
- We appreciate the delayed effective date and the opportunity for current eligible clients to maintain existing services for an extended period of time.
- As a general recommendation, we propose this policy and the Beyond ADA service be reviewed by the MAC and IndyGo staff no less than every two years, to regularly assess data and needs and to determine if adjustments to the policy are needed.
 - A report of updated data and metrics, reviews and findings, and recommended policy changes should then be formally reported to the IndyGo Board of Directors and the public at large.
 - As part of this continuous review process, we propose that specific data measures and metrics be identified to track and assess performance, quality, and effectiveness.
 - This information can be used to determine if the objectives and improvements expected through this policy are met.
 - MAC members and other external stakeholders should be involved in determining related information and processes.
- Finally, we are curious how this planning and policy development process connects with other past, current, and future related efforts, such as the regional Coordinated Public Transit - Human Services Transportation Plan Update, the Comprehensive Operational Analysis, 5307/5311 funding allocation changes, and the ADA Transition Plans from the City of Indianapolis and the Indiana Department of Transportation.

In closing and as always, we appreciate the opportunity to provide public comment and to support IndyGo in advancing its mission. We look forward to your responses and hope to see this input reflected in policy adoption and implementation. Please don't hesitate to let us know of any questions for us.

Sincerely,



Kim Irwin, MPH
Executive Director