ADA Paratransit Triennial Review

For the period 2021-2023

Prepared by the
Regional Transportation Authority
Audit Department

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Regional Transportation Authority

Triennial ADA Paratransit Review

Executive Summary

This report summarizes the results of the Regional Transportation Authority (RTA) Audit Department's triennial audit of Pace Suburban Bus (Pace) Americans with Disability Act (ADA) Paratransit Service for the period of 2021-2023. The operation of the ADA Paratransit Service, which provides transportation to eligible individuals who are unable to use accessible fixed-route services in the RTA region due to their disabilities, is the responsibility of Pace. The audit was conducted in order to comply with the RTA Act which requires the RTA to conduct triennial financial, compliance, and performance audits of ADA Paratransit services.

The audit included the verification of the financial integrity of data used by the RTA, assessment of the accuracy of data used for compliance monitoring, and determination of the accuracy of data used to evaluate performance. In certain instances, we relied upon the audit work performed by Baker Tilly US, LLP (Baker Tilly). Based on work performed in areas relevant to this audit within the review period, our review indicated that it was of sufficient quality to place reliance and avoid duplication.

Results of our review included:

- All financial data that was reviewed in conjunction with the audit was adequately supported.
- ADA Service Revenue and ADA Service Expenses were supported by key data elements including ridership statistics, service hours, on-time performance and missed trips, all of which are captured in Pace's system. We reviewed the methodologies for determining Administrative Expenses and the Indirect Overhead Allocation and determined they were reasonable.
- Compliance with ADA requirements was validated through a thorough comparison to Pace's policies and an evaluation of selected performance statistics and practices. The disclosure of policies in Pace's Customer Guide was deemed appropriate and clear. Review of the relevant statistics indicated that Pace met ADA requirements for the audit period.
- Key elements used to evaluate ADA Paratransit performance were sourced from Pace's Trapeze scheduling and routing system, which is now the primary platform for operational tracking and reporting. The Trapeze system provides detailed, real-time data on scheduling, routing, on-time performance, travel time, and trip productivity, allowing for better insights and performance monitoring.

Post-COVID Service Evolution and Continuity (2021-2023)

The 2021-2023 Triennial Audit period marked a strategic shift for Pace, from pandemic crisis response toward long-term adaptation and operational innovation within its ADA Paratransit program. While the effects of COVID-19 continued to shape travel behavior and staffing availability, Pace focused on service continuity, rider flexibility, and system-wide modernization.

Key post-pandemic developments include:

- **Return to Standard Contracting and Service Stability**

  Following the emergency contract modification in 2020 (e.g., standby hours), Pace gradually returned to performance-based agreements with paratransit carriers. Adjustments made during the pandemic-such as flexibility in scheduling and modified productivity metrics - were evaluated and selectively retained to improve service stability.

- **Expansion of Taxi Access Program (TAP)**

  Building on the increased reliance on taxis during 2020, Pace continued to expand on demand service options for ADA Paratransit riders:

  - The Taxi Access Program (TAP) remained a vital option in Chicago, with subsidized fares reinstated at a lower rate in 2023 and daily trip limits raised to eight per day.
  - The DuPage Access Program, launched in 2022, allowed eligible riders in DuPage County to request free rides (up to $30) through the Uber platform or call-in reservations.

- **Digital Communication Improvements for Riders**

  Pace expanded rider communication capabilities through email and text notifications, also implemented Ventra with no contact faring for ADA Paratransit services since 2021, improving responsiveness and transparency. These tools were linked to complaint tracking and resolution systems, enabling better monitoring of customer service performance.

- **Accessibility and Capital Investments**

  In July 2023, Pace broke ground on a new ADA Paratransit Transfer Facility in Schaumburg, enhancing comfort and access for riders with amenities such as indoor waiting space and EV charging stations. Additionally, ADA Paratransit riders were granted free access to Pace's fixed-route buses upon showing a valid ADA card, increasing mobility options systemwide.

Pace has demonstrated a thoughtful transition from emergency pandemic response to long-term program enhancement, focusing on flexibility, accessibility, and operational resilience within its ADA Paratransit services.

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Introduction

Pace's ADA Paratransit Service provides origin-to-destination transportation to ADA Paratransit eligible individuals who are unable to use accessible bus and rail service due to their disabilities. Pace is responsible for the operation of all ADA complementary paratransit services in the six- county RTA region and RTA is responsible for the funding, financial review, and oversight. In 2023, Pace provided approximately 2.6 million rides to eligible customers in the program at a cost of $237.3 million. This compares to 2.3 million rides at a cost of $207.5 million in 2022.

Audit Objectives

The RTA Act was amended in 2008 to require the RTA to conduct triennial financial, compliance, and performance audits of ADA paratransit services to assist in the determination of the projected annual costs of ADA paratransit services that are required to be provided pursuant to the ADA and implementing regulations. This audit is intended to comply with the requirement that RTA conduct such audits, with the following objectives:

- Verify the financial integrity of the data used by the RTA to evaluate the costs of delivering ADA paratransit services.
- Assess the accuracy of the data used for monitoring compliance.
- Determine whether the data used to evaluate compliance with performance standards is accurate.

Scope of Review

The scope of this triennial audit focuses on financial activities, with particular attention to expense transactions incurred during the past three years (FY2021-FY2023). The emphasis is placed on the most recent fiscal year 2023 due to its relevance to the current financial performance.

- Determine whether the 2023 operating expenses are adequately supported. Key expenses that were reviewed include ADA service expenses (purchased transportation), fuel, and administrative expenses.
- Determine whether contractor invoices for purchased transportation are reviewed for accuracy by Pace staff and whether such invoices are supported by service hour data and fares collected.
- Verify data used for monitoring ongoing compliance with ADA Paratransit Requirements.
- Verify that semiannual desk audits are being conducted for each purchased transportation contractor.
- Conduct an onsite visit to assess how ADA's rider concerns are being managed and resolved.

Background

The ADA requires that all public entities that provide non-commuter fixed route transit service also provide complementary paratransit service for people who are unable, because of a disability, to use the fixed route service. The ADA complementary paratransit must meet specific regulatory criteria related to service area, response time, fares, days and hours of operation, trip purposes, and capacity constraints. These regulatory criteria are designed to ensure that ADA complementary paratransit service provides a level of service that is comparable to that provided by the associated fixed route services. Entities are also required to establish a process for determining who is eligible to receive this complementary paratransit service.

ADA complementary paratransit service is required where the CTA and Pace operate non-commuter fixed route transit services. The service provided by Metra does not require complementary paratransit, since it is strictly a commuter service.

From 1992 through June 2006, CTA and Pace operated separate ADA paratransit services. CTA operated ADA paratransit in the City of Chicago and Pace operated ADA paratransit in the suburbs outside of the city.

On July 29, 2005, the General Assembly made changes to the RTA enabling legislation that affected the structure of paratransit service. Pace was tasked with assuming responsibility for the operation of all ADA paratransit services. The RTA was also made responsible for the funding, financial review and oversight of all ADA paratransit services provided by any of the Service Boards.

On July 1, 2006, in response to the legislative directive, Pace assumed responsibility for the operation of all ADA paratransit services throughout the region, both city and suburban services. Initially, Pace continued to operate service in Chicago based on the model that had been developed by the CTA. In 2006 and 2007, Pace analyzed the ADA paratransit services in an effort to develop design and policies that could both improve customer service and service efficiency while ensuring that the service was operated in full compliance with ADA requirements.

Below are the current providers for ADA Paratransit service covering specific areas in the Northeastern Illinois six- county region.

ADA Paratransit Service Providers

Area(s) of Service	Service Provider	Service Type
City of Chicago and North Cook County	Cook DuPage Transportation (CDT)/ National Express/WeDriveU	Dedicate Paratransit Bus
City of Chicago, McHenry, West Cook and Will Counties	First Transit/TransDev	Dedicated Paratransit Bus
City of Chicago	MV Transportation	Dedicated Paratransit Bus
City of Chicago and South Cook Country	SCR Transportation	Dedicated Paratransit Bus
DuPage, Kane, South Cook, West Cook and Will Counties	Alliance Taxi	Contracted Non-Dedicated Taxi
City of Chicago, DuPage, Lake, North Cook, South Cook, West Cook and Will Counties	Blue Ribbon Taxi	Contracted Non-Dedicated Taxi
City of Chicago, DuPage, Kane, Lake, McHenry, North Cook, South Cook, West Cook and Will Counties	303Taxi	Contracted Non-Dedicated Taxi
DuPage, Kane, Lake, McHenry, North Cook, South Cook, West Cook and Will Counties	Freedom First	Contracted Non-Dedicated Taxi
City of Chicago, DuPage, Kane, North Cook, South Cook, West Cook and Will Counties	RideX	Contracted Non-Dedicated Taxi
City of Chicago, DuPage, Kane, Lake, McHenry, North Cook, South Cook, West Cook and Will Counties	UZURV	Contracted Non-Dedicated TNC

Amendment to the RTA Act

The amendment to the RTA Act in 2008 contained a new provision requiring the RTA to annually provide a written determination of the projected annual costs of ADA paratransit services that are required to be provided pursuant to the ADA and the implementing regulations. The legislation also requires the RTA to “conduct triennial financial, compliance, and performance audits of ADA paratransit services to assist in this determination” (70 ILCS 3615/2.01d).

Pursuant to the legislative mandate in 2008, the RTA initiated a Triennial ADA Paratransit Audit addressing the financial, compliance and performance aspects of operating the ADA Paratransit service for the periods of 2009-2011. Additional triennial audits were performed in 2016 (for the period 2012-2014), 2019 (for the period 2015-2017), and 2022 (for the period 2018-2020).

The objective of this Triennial audit for the period of 2021-2023 was to reach concurrence with the reasonableness of the costs to operate the service within the framework of compliance with Federal regulations and standards. The data reviewed was for the calendar years 2021-2023.

Financial Audit

As previously mentioned, Pace's 2021-2023 Annual Financial Statements were audited by Baker Tilly, which issued an unqualified opinion on the basic financial statements. The ADA Paratransit Services Fund financial statements are included as exhibits within Pace's Annual Financial Reports for those years. These ADA Paratransit financial data were subject to the same auditing procedures as the overall financial statements, with additional limited audited procedures focused on management inquiries regarding measurement and presentation methods for supplementary information**.**

Since Pace's 2021-2023 financial statements had been audited recently and were available at the time of our review, they served as the basis for our testing. Below is a summary of operating revenue, expenses, and funding for this period:

2021-2023 Operating Revenue and Expenses

	2021	2022	2023
Operating Revenue			
ADA Service Revenue	$6,754,040	$7,334,630	$9,565,923
Other Income	$0	$672,658	$1,546,599
Total Operating Revenue	$6,754,040	$8,007,288	$11,112,522
Operating Expenses			
ADA Service Expenses	$165,001,416	$182,663,872	$210,686,386
Centralized Operations	$8,187,621	$10,504,994	$9,916,214
Administrative Expenses	$5,468,534	$6,704,016	$8,160,692
Indirect Overhead Allocation	$7,609,249	$7,645,798	$8,586,204
Total Operating Expenses	$186,266,820	$ 207,518,680	$237,349,496
Operating Income (Loss)	($ 179,512,780)	($ 199,511,392)	($ 226,236,974)

	2021	2022	2023
Funding			
RTA Paratransit Fund	$157,285,039	$188,450,192	$216,219,519
ADA State Funding	$8,394,804	$8,394,802	$8,394,800
CARES Funding	$0	$741,648	$0
CRRSSA Funding	$13,786,075	$6,213,925	$0
Interest on Investments	$46,862	$417,724	$1,823,470
Increase (Decrease) in Net Position	$0	($4,706,899)	($200,815)
Total Non-Operating Rev.	**$179,512,780**	**$199,511,392**	**$226,236,974**

The above chart comes from supplementary schedules in the independent auditor's reports for the respective years. Other income represents interest in investments and reimbursements from the RTA for transportation provided to potential Paratransit customers who attended certification testing.

ADA service expenses (purchased transportation), fuel, administrative expenses, and indirect overhead allocation were also selected for review. Pace's Accounting Department provided account details supporting the total revenue and expenses for each category for September 2023, as requested.

ADA Service Revenue

The carriers submit monthly invoices to Pace. One component of these invoices is the imputed fares collected from riders ($3.25 fare rate x number of riders), which Pace uses to offset against the expenses being requested for reimbursement. Pace validates the amount of revenue reflected on the invoices through the generation of a Pace report (Hours and Ridership Report) that identifies the number of passengers. The total revenue is calculated by extending the number of passengers at the applicable rate. In 2023, Pace provided over 2.6 million passenger trips for which it collected $3.25 from each passenger. Pace's calculated revenue is used for determining the amount of revenue for settlement with the carriers, as opposed to the amounts reflected on the carrier's invoices, which may differ slightly from Pace's calculation. The carriers accept Pace's calculated revenue as correct, since the data is extracted directly from Pace's system.

A sample of carrier invoices (one Chicago and one suburban) from the account details was selected for testing. Each invoice was reviewed to verify that the amount of revenue was correctly calculated based on the ridership and fare. Invoices selected included the following carrier/service areas:

2023 Carrier Invoices – Revenue

Carrier	Month (General Ledger)	Territory	Invoice Amount
Freedom Will – Will County	September	Will County	$333.00
First Transit - Chicago	September	Chicago	$44,402.25
		Total:	**$44,735.25**

The revenue amounts were traced to the billing reconciliation prepared by Pace. The number of passenger trips was then traced to the Pace report of passenger trips for which fares were collected and the extended amount based on the applicable fare was recalculated without exception.

Other Income

Other income includes reimbursements from the RTA for trips provided to potential ADA Paratransit customers to attend certification testing and current customers for recertification. These trips are scheduled at the request of the RTA which reimburses Pace for their cost. In 2023, the RTA reimbursed Pace $1,546,599 for 15,358 trips.

ADA Service Expenses

The carrier's monthly invoices to Pace itemize service expenses and deduct liquidated damages for contract non-compliance. Pace validates the expenses reflected on the invoices through a Pace report (Hours and Ridership Report) that identifies the number of service hours. The total expenses are calculated by extending the number of service hours at the applicable rate. Pace's calculation is used for determining the total expenses for settlement with the carriers, as opposed to the amounts reflected on the carrier's invoices which may differ slightly from Pace's calculation. The carriers accept Pace's calculated expenses as correct, since the data is extracted directly from Pace's system.

Liquidated damages offset expenses when carriers fail to meet contract standards. Pace generates several reports (i.e. On-time Performance Report, Missed Trip Report, Carrier Report) that are used to determine the number of instances of non-compliance. The number of instances is extended by the applicable rate to arrive at the total damage by type. Liquidated damages are imposed upon the carriers for failure to meet a variety of contract standards including:

- On-time performance goal not achieved (late pick-ups)
- Missed trips
- Missed trips not reported
- Productivity goals not met
- Vehicle maintenance issues not addressed
- Reporting requirements not met
- General monthly reporting
- Not answering complaints
- Accident reporting
- Denial reporting
- Scheduling/dispatch/reporting

The sampled invoices selected for review were for the same carriers/service areas as used for the ADA service revenue testing. Each invoice was reviewed to ensure that the amount billed was correctly calculated based on the number of service hours offset by the liquidated damages. Service hours were traced to supporting reports to ensure their accuracy. The service hour rates were traced to the appropriate rates in the carrier's contract. The hourly rates for the carriers/service areas tested ranged from $65.26 to $70.33, with the variability in rates dependent upon whether the carrier provided their own vehicles, fuel or insurance. Accordingly, individual carriers per trip costs vary considerably and do not serve as a valid basis of comparison to other carriers. The extended amounts were recalculated based on these elements. No exceptions were noted. Invoices selected included the following carriers/service areas:

2023 Carrier Invoices – Expenses (net of liquidated damages)

Carrier	Month (General Ledger)	Territory	Service Hours	Invoice Amount
First Transit	September	Chicago	21,101	$1,911,283
Freedom South	September	South Cook	730	$39,444
Cook DuPage Trans	September	Chicago	35,084	$3,414,640
		Total:		**$5,365,367**

Liquidated damages were also recalculated to ensure they were correctly computed. Instances of non-compliance (which result in liquidated damages) were traced to supporting reports. The cost of each category of liquidated damage was recalculated based on the contract terms. The total cost of each category was extended to ensure accuracy. No exceptions were noted. The number of liquidated damages for the carrier invoices reviewed was:

2023 Carrier Invoices – Liquidated Damages

Carrier	Month (General Ledger)	Territory	Invoice Amount
First Transit	September	Chicago	$52,698
Freedom South	September	South Cook	$527
Cook DuPage Trans	September	Chicago	$236,841
		Total:	**$290,066**

Fuel

Per the terms of the agreements with suburban carriers, Pace provides fuel cards for the purchase of gasoline through a network of retail service stations. Since the 2017 audit, all diesel vehicles have been phased out of the paratransit fleet in favor of gasoline-powered vehicles to meet operational and capacity requirements.

Carriers operating within the City of Chicago are responsible for providing their own fuel. A sample of fuel card invoices from September 2023 was selected for review. During that month, total gasoline purchases across all vendors totaled $701,179.

Pace utilized both Mansfield Oil Company and Petroleum Trades Corporation for fuel purchases in 2023. Each vendor provides fuel cards that allow for the purchase of gasoline at approved retail fueling stations. The sample reviewed included the following:

2023 Fuel Card Invoices

Carrier	Territory	# of Gallons	# of Invoices	Invoice Amount
Mansfield Oil Company	Kane County	3,409	1	$11,553.31
Petroleum Trades Corp	Cook County	8,477	1	$23,217.97
Petroleum Trades Corp	Cook County	2,985	1	$8,425.88
	Totals:	**14,871**	**3**	**$43,197.16**

Each invoice was reviewed to confirm that the amount billed corresponded with the transaction details and that Pace performed appropriate oversight and reconciliation. No discrepancies were noted.

Pace's fuel card management process is governed by the "Standard Procedures for Paratransit Fuel Cards." Under these procedures, the Vanpool/Paratransit Fleet Fuel Coordinator (VFFC) oversees card issuance, usage monitoring, and cancellation for fleet changes. Drivers are required to enter odometer readings and use vehicle-specific PINs when refueling. Contractors are responsible for maintaining daily fuel card distribution logs and reporting any issues, including lost or stolen cards, to the VFFC.

Fuel transactions are monitored daily, weekly, and monthly to identify any anomalies, such as excessive fuel frequency, incorrect fuel types, or use of unauthorized fueling locations. Questionable transactions are flagged and sent to the contractors for verification, and supporting documentation, including fuel receipts, may be requested. Contractors are reminded regularly of proper usage requirements.

On a monthly basis, fuel invoices are reconciled to transaction-level data to ensure that gallons purchased match invoice totals and that tax exemptions are appropriately applied. Final invoices are reviewed by management and forwarded to accounting for processing and payment.

Fuel charges related to other programs, such as Ride in Kane and Dial-a-Ride, may also be included on these invoices. These costs are identified based on the assigned vehicles and are reclassified in the general ledger accordingly. The review did not identify any issues with this process.

Administrative Expenses

Administrative expenses consist primarily of salaries (and associated benefits) for the staff who work on the ADA program, the cost of providing certification transportation, and other miscellaneous support costs including IT, rent and utilities related to the ADA staff located in the Chicago Office at 547 W. Jackson Blvd. An allocation of salaries and benefits associated with the Paratransit staff that supports both ADA and non-ADA functions is also made.

Our procedures were limited to gaining an understanding of the types of costs included within administrative expenses and the methodology for accumulating these expenses within the account. Pace's accounting system captures all costs associated with staff assigned solely to the ADA function and services directly attributable to ADA. An additional allocation of costs associated with staff assigned to the Paratransit function is made through an annual survey process whereby the revenue hours allocated to ADA and non-ADA functions are used to distribute the following year's costs. Administrative expenses of $8,160,692 were reported on the December 31, 2023 Pace Statement of Revenues and Expenses.

Based on our evaluation of the process by which costs are directly charged or allocated to administrative expenses, it appears that the methodology is reasonable and reflective of the costs incurred.

Indirect Overhead Allocation

Pace incurs overhead costs for managing and operating the ADA program. Such costs consist of a variety of overhead activities that support the functioning of the ADA program but cannot be directly associated with ADA. These include the myriads of support functions provided at Pace headquarters by the following departments: Audit, Budget Planning, Finance, General Counsel, Government Affairs, Human Resources, Marketing and Communications, Purchasing, and Risk Management.

Our procedures included gaining an understanding of the types of costs included within the Indirect Overhead Allocation and the methodology for accumulating these expenses within the account. The allocation is based on a process whereby an annual survey is conducted of all support functions. The time attributable to supporting ADA is accumulated and used to develop a rate that is then applied to the ADA activity based on the actual ADA salary costs incurred during the current year. The percentage used to allocate these costs in 2023 was 267.25%, which was based on 2022 expenses. This methodology was developed by a third-party consultant and is reviewed annually to ensure continued applicability.

Based on our understanding of the process by which costs are allocated to Indirect Overhead, it appears that the methodology is reasonable and reflective of the costs incurred in support of the ADA function.

Recent Developments

On March 11, 2024, Pace introduced the Rideshare Access Program (RAP) in addition to Taxi Access Program (TAP) and other services such as Dial-a-ride Services (DAR), On Demand, etc. The RAP program is a subsidy offered to eligible ADA Paratransit-certified customers choosing to take rides with Uber or UZURV/The Adaptive Transportation Network Company for same-day trips instead of using ADA paratransit services. Eligible riders enrolled in RAP pay the first $2.00 of the cost of a trip taken with Uber or UZURV if the origin and destination of the trip is within Pace's ADA paratransit service area (i.e., ¾ of a mile from any Pace or CTA fixed bus route); Pace subsidizes the cost of the trip after the first $2.00 and not exceeding $30.00. Eligible riders are responsible for paying: any portion of the cost of the trip that exceeds $30.00; any rideshare provider surcharge applicable to the trip (e.g., advance booking surcharge); and any driver tip. Pace reimburses the rideshare provider for the subsidized portion of the cost of the trip and subsidizes no more than eight trips per day for each eligible rider enrolled in RAP.

This newly introduced program was not audited because it did not start until FY24. It will be included in the next triennial review or earlier if necessary.

Compliance Audit

Key compliance-related topics were identified and assessed against Pace's policies, as outlined in the Pace ADA Paratransit Service Customer Guide. The evaluation focused on key service areas, with emphasis on alignment with ADA requirements. Topics reviewed included:

- Service areas and hours
- Fares
- Trip purpose restrictions/priorities
- On-time pickups
- On-time drop-offs
- Trip denials
- Trip lengths
- Waiting list
- Complaints and subsequent resolution

Policies pertaining to these areas were disclosed appropriately in the Customer Guide and found to be consistent with ADA requirements.

Pace also provided supporting data for selected performance metrics from calendar year 2023 to evaluate ADA compliance in practice.

Key Areas Assessed

A. On-time pickups

Measures the timeliness of vehicle arrivals at scheduled pick-up locations. Arrival and departure times are captured in real time through onboard MDDs and retained in at the Trapeze database.

Pace defines an on-time pickup based on two-time windows:

- Original window:
- Up to 20 minutes after the scheduled pickup time in Chicago
- Up to 15 minutes in suburban areas
- Early arrivals are also considered on time
- Expanded window:

- Up to 30 minutes post-scheduled pickup
- Applied system-wide to provide a more comprehensive performance measure

2023 Performance Results

Location	On-Time (Original Window)	On-Time (Expanded 30-min. Window)
Chicago	87.45%	94.56%
Suburbs	91.17%	96.84%

While performance under the original window fell short of the 95% target, service met or exceeded expectations under the expanded window. This dual-tracking method helps maintain high standards while accounting for external operational factors such as severe weather, construction, staff shortages, and fleet availability.

Pace continues to monitor performance monthly and collaborates with carriers to implement corrective action plans when underperformance is due to controllable factors.

B. On-time drop-offs

Tracks whether vehicles arrive at customer destinations by the scheduled appointment time, a key measure for time-sensitive trips such as medical visits or transfer coordination.

While the Federal Transit Administration (FTA) does not set a specific benchmark for on-time drop-offs, it requires that riders arrive before their appointment times and that providers track and assess performance against internal standards.

Pace's internal goal is 90% on-time drop-offs, reflected in its carrier agreements. If performance falls below 85% in any month, Pace initiates a root cause analysis with the provider.

2023 Drop-Off Performance

Location	Average On-Time Drop-Off Rate
Chicago	84.06%
Suburbs	87.09%

These figures fall below the internal target, especially in Chicago. Contributing challenges included traffic congestion, construction, scheduling limitations, and provider-specific issues such as staffing and vehicle reliability. Performance is closely monitored and addressed through reviews and operational adjustments to improve reliability and punctuality.

C. **Trip denials**

Under ADA guidelines, eligible paratransit trips must be accepted unless specific regulatory conditions apply. Capacity-based denials are not permitted.

Pace denials are recorded in the Trapeze database at the time of the reservation and ongoing denial report review are performed to ensure compliance with the ADA. Denials are classified as:

- Capacity Denials: Denials are due to insufficient resources (e.g., drivers or vehicles). Pace prohibits capacity denials for ADA-eligible trips. All such trips must be accepted and accommodated within the designated ADA service area, during the required service hours and days.
- Adversarial Denials: Occur when a rider declines a pick-up time that falls within the ADA-allowable window (e.g., within one hour before or after the requested time).
- Eligibility Denials: Apply when the ride request falls outside the scope of ADA paratransit service (e.g., non-eligible locations, times, or ride status).

According to data provided by Pace, no ADA capacity denials were reported during the calendar year 2023, consistent with regulatory expectations and Pace's policies.

D. **Trip lengths**

The ADA requires that paratransit trips with the same origin and destination be comparable in length to fixed-route travel, including transfers and waiting time.

Pace enforces this requirement by:

- Requiring contractors to use the RTA Trip Planner to assess fixed-route equivalents
- Conducting random audits through its Quality Assurance (QA) team
- Monitoring trips daily and addressing violations in monthly contractor feedback

Passengers may report concerns using the Travel Time Inquiry Form available on Pace's website. QA investigates and follows a structured resolution process:

- If a trip exceeds acceptable travel time, the rider is added to an action plan and an alert is place in the system.
- QA reviews the rider's travel history over 30 days, then again at 60 days if needed.
- Issues unresolved after 60 days are escalated to Operations for further action.

Based on 2023 monitoring, no pattern or practice of excessive travel times were identified.

E. **Waiting list**

FTA regulations under the ADA prohibit the use of a waiting list for ADA paratransit trip requests. All eligible trips within the defined service area and hours must be scheduled without delay.

Pace does not maintain a waiting list and is in full compliance with this requirement.

F. Complaint processing time

Pace's Customer Relations (CR) staff logs all complaints into a centralized database that tracks the number of days until each complaint is closed. The database monitors the time complaints are assigned to the Paratransit Quality Assurance (QA) Department for research and investigation, as well as the time complaints spend in CR pending closure after the complainant has been contacted. Additionally, complaints are now tracked across Passenger Services (PS) and Provider departments, providing a full view of complaint processing timelines.

In 2023, over 19,900 complaints were filed, averaging approximately 1,659 complaints per month, which represents 0.75% of total rides.

To assess processing timeliness, a sample of 24 complaints filed in June 2023 was reviewed. That month, 1,443 complaints were filed, which was below the monthly average. The June sample below showed the following average time complaints remaining in each department:

- Passengers Services (PS): 58.6 days
- Quality Assurance (QA): 18.46 days
- Provider: 19.54 days
- Customer Relations (CR): 82.11 days

During the review of June 2023, it was noted that many complaints closed out by CR were processed more than a year after being received. Pace attributed this delay to a system transition that took place from December 2022 through most of 2023, during which complaints migrated from a legacy system to the CSM complaints system. As part of this transition, a total of 232 complaints were assigned an arbitrary closing date in 2024. The monthly average number of days spent on complaints by PS, QA, Provider, and CR varied throughout the year, as shown in the chart below.

Average Number of Days (in a month) that Complaints were open during 2023

Complaint Handler	Avg. for All Months	Avg. Monthly Low	Avg. Monthly High
Passenger Services (PS)	34.76	15.94	58.6
Quality Assurance (QA)	17.71	12.51	24.42
Provider	16.01	11.26	23.19
Customer Relations (CR)	55.51	42.65	82.11

The individual monthly totals are shown in Figure 1 below. Based upon these results, it appears the testing sample was slightly skewed to the longer completion times, but not significantly.

Figure 1-Timeliness of Complaint Processing in 2023

Month	Monthly Total	Avg. Days in PS	% Time in PS	Avg. Days in QA	% Time in QA	Avg. Days in Provider	% Time in Provider	Avg. Days in CR	% Time in CR	Avg. # of Days Total
Jan.	1,376	37.97	29.75%	17.24	13.51%	13.91	10.90%	58.51	45.84%	127.63
Feb.	1,560	24.93	26.18%	14.87	15.61%	12.79	13.43%	42.65	44.78%	95.24
Mar.	1,714	31.78	30.61%	12.51	12.05%	11.26	10.85%	48.26	46.49%	103.81
Apr.	1,591	32	28.99%	14.54	13.17%	13.37	12.11%	50.46	45.72%	110.37
May	1,905	45.92	31.72%	16.65	11.50%	16.12	11.13%	66.09	45.65%	144.78
Jun.	1,443	58.6	32.79%	18.46	10.33%	19.54	10.93%	82.11	45.95%	178.71
Jul.	1,515	47.75	33.32%	15.47	10.79%	14.44	10.08%	65.66	45.81%	143.32
Aug.	1,874	41.24	32.87%	14.78	11.78%	11.47	9.14%	57.96	46.20%	125.45
Sep.	1,944	32.13	27.64%	17.63	15.16%	14.49	12.46%	52.01	44.74%	116.26
Oct.	1,994	27.47	22.39%	22.86	18.63%	19.69	16.05%	52.66	42.92%	122.68
Nov.	1,573	21.39	18.87%	23.1	20.38%	21.81	19.24%	47.04	41.50%	113.34
Dec.	1,417	15.94	14.99%	24.42	22.97%	23.19	21.81%	42.76	40.22%	106.31
Total	**19,906**									
Annual Avgs.	1,658.83	34.76	28.03%	17.71	14.28%	16.01	12.91%	55.51	44.77%	73.22 [1]
Compared to 2022 Avgs[2]:	854			34.82	60.69%			22.55	39.31%	57.37

[1] Total excludes Passenger Service (PS) and Providers.

[2] The data for 2023 includes complaints traced across Passenger Service (PS) and Provider, in addition to the Quality Assurance (QA) and Customer Relations (CR) departments. In contrast, 2022 data only include complaints tracked in QA and CR.

G. Responses to complaints

Pace ensures that complaints are reviewed, categorized, and forwarded to contractors within 24 hours of receipt. This system aims to expedite responses and ensure that corrective actions are taken as promptly as possible. Contractors are required to respond within three business days, with automated alerts triggering if this deadline is missed. If a contractor fails to respond within the required timeframe, the complaint is escalated to Pace's Operations team, which may impose liquidated damages as per the contractual agreements.

The same sample of 24 complaints from the June 2023 testing of complaints was used to analyze the responses provided to the complaints. The Customer Assistance Form (CAF) for each complaint was reviewed to assess the responsiveness to the complaint and determine whether the action taken and responses provided appeared appropriate.

Based on the review of these complaints and management's responses, the actions taken appropriately addressed the reported issues. When appropriate, corrective action was noted that should reduce the likelihood of a recurrence of a similar complaint.

During the testing of customer complaints, the review also identified some positive feedback. Since customer contact and feedback is all tracked via the CAF process, these instances are included in the complaint volume and trends.

Performance Audit

As required, Pace contracts annually with an external auditor to perform certain procedures that validate the accuracy of the reported NTD data. In June 2024, Baker Tilly issued a report covering the 2023 NTD data. Baker Tilly followed procedures established by FTA with regard to the data reported in the annual Regional ADA Paratransit Services Fund National Transit Database report for the fiscal year ended December 31, 2023. These procedures were agreed to and specified by FTA and were agreed to by Pace. In performing these procedures, no findings were noted by Baker Tilly regarding the information included in the NTD report.

National Transit Database Reporting

Data used to monitor ADA Paratransit performance is extracted from the National Transit Database (NTD). This information is entered into the database by Pace via an NTD Internet Reporting web site. Key data elements include:

- Vehicle Revenue Miles (VRM) – Demand Response
- Vehicle Revenue Miles (VRM) – Demand Response Taxi
- Vehicle Revenue Miles (VRM) – Transportation Network Companies (began Dec 2022)
- Vehicle Revenue Hours (VRH) – Demand Response
- Vehicle Revenue Hours (VRH) – Demand Response Taxi
- Vehicle Revenue Hours (VRH) - Transportation Network Companies (began Dec 2022)
- Unlinked Passenger Trips (UPT) – Demand Response
- Unlinked Passenger Trips (UPT) – Demand Response Taxi
- Unlinked Passenger Trips (UPT) – Transportation Network Companies (began Dec 2022)
- Passenger Miles Traveled (PMT) – Demand Response
- Passenger Miles Traveled (PMT) – Demand Response Taxi
- Passenger Miles Traveled (PMT) – Transportation Network Companies (began Dec 2022)
- Total Actual Vehicle Miles – Demand Response
- Total Actual Vehicle Hours – Demand Response

In order to assess the validity of the data entered into NTD, Pace provided supporting documentation detailing the amounts entered. This documentation consisted of worksheets that listed each carrier along their respective monthly volume. Detailed testing of these worksheets was not performed due to our reliance on alternative procedures performed by the external auditor, as noted below.

FTA requires agencies in urbanized areas with populations greater than or equal to 200,000 with 100 or more vehicles operated in annual maximum service across all modes and types of service to have an independent auditor review all NTD data used in the Urbanized Area Formula Program and the Capital Program for Fixed Guideway Modernization allocations. This is an annual requirement and must be documented via the Independent Auditor Statement for Federal Funding Allocation Data. FTA provides a suggested list of procedures to satisfy the requirements of this review.

The independent auditor is expected to perform procedures in order to attest to the following:

- Assurance that a system exists to record and gather data on a continuing basis.
- Assurance that a system exists, and is maintained, for recording data in accordance with NTD definitions. This means that the correct data is being measured and that there are no systematic errors.
- Assurance that source documents are available to support the reported data and are maintained for FTA review and audit for a minimum of three years following FTA's receipt of the NTD Annual report. The data must be fully documented and securely stored.
- Assurance that there is a system of internal controls to ensure the accuracy of the data collection process and recording system and that reported documents are not altered.
- Assurance that a supervisor reviews and signs documents as required.
- Assurance that the data collection methods are those suggested by FTA or have been approved by FTA or a qualified statistician as being equivalent in quality and precision. The collection methods must be documented and followed.
- Assurance that the deadhead miles, computed by taking the difference between the reported total actual vehicle miles data and the reported total actual VRM data, appear to be accurate.
- Documentation that reported data have undergone analytic review to ensure that they are consistent with prior reporting periods and other facts known about transit agency operations.
- Documentation of the specific documents reviewed, and tests performed.
- Documentation of how purchased transportation fare revenues and contract expenditures are reported.

Monthly Carrier Performance Reviews

Pace performs monthly carrier performance reviews of each of the 13 carriers/service areas. A review is also performed of the regional call center that services DuPage and Kane County. The purpose of these reviews is to ensure that performance-related issues are identified timely so that corrective action can be taken. They assist in identifying performance deficiencies that could impact customer service related to transportation and call center activities.

Pace has established the following minimum contractual benchmarks for service delivery:

- 95% on-time performance (OTP) for scheduled pick-ups
- 90% appointment on-time performance (AOTP) for drop-offs

While these reflect the minimum requirements, Pace's internal performance target is 100% compliance for both metrics. These goals are consistent with Pace's commitment to delivering reliable and accessible transportation services for ADA paratransit riders.

Pace provided copies of each of the reviews from July 2023 to December 2023. Our review indicated that reviews were conducted for all carriers and the call center operator.

Carrier On-Site Reviews

Pace conducts quarterly on-site reviews for each of the 13 carriers/service areas, along with site visits to regional call centers. These reviews are designed to ensure accurate data collection and reporting, verify compliance with operational procedures, and evaluate the quality of customer service. Areas of focus include:

- **Data Collection and Reporting**: Ensuring the accuracy and compliance of source documents and the reporting system.
- **System Compliance**: Reviewing adherence to Pace's operational procedures and standards.
- **Customer Serv**ice: Evaluating the professionalism of telephone interactions and customer support.
- **Employee Documentation**: Verifying that drug and alcohol testing, employee licensing, physicals, and background checks are properly documented in staff files.
- **Quality Assurance Compliance**: Ensuring compliance with established quality control measures.

In addition to scheduled quarterly reviews, management conducts unscheduled "drop-in" visits to address specific concerns identified through monthly performance reviews or other monitoring efforts. These visits provide timely follow-up on emerging issues.

To accommodate operational constraints and geographical distance, virtual reviews remain an option. These involve submitting requested documentation and supporting images for remote reviews. In 2023, Pace fully implemented a hybrid model using both in-person and virtual methods to maintain consistent oversight across all carriers.

As part of the audit, we reviewed the 2023 On-Site Review Tracking Log and related inspection reports. Reviews were conducted as scheduled and in accordance with the established criteria. Supporting documentation, including virtual review logs, was organized and demonstrated compliance.

Total ADA Ridership

The total annual ridership is reported as:

ADA Trips	2021	2022	2023
Chicago	1,541,433	1,752,246	1,994,856
Suburban	492,027	577,081	652,561
Regionwide	2,033,460	2,329,327	2,647,417

Total Chicago ADA Services – Monthly

Month	2021 Riders	2022 Riders	2023 Riders	% Change 2021-2022	% Change 2022-2023
Jan.	106,485	115,769	155,445	8.72%	34.27%
Feb.	104,222	122,698	147,138	17.73%	19.92%
Mar.	131,700	152,782	169,971	16.01%	11.25%
Apr.	129,575	146,817	160,269	13.31%	9.16%
May	127,234	150,124	172,278	17.99%	14.76%
Jun.	129,139	148,677	165,667	15.13%	11.43%
Jul.	134,826	148,491	162,920	10.14%	9.72%
Aug.	137,527	158,241	176,182	15.06%	11.34%
Sep.	136,041	154,399	168,877	13.49%	9.38%
Oct.	139,146	156,918	179,748	12.77%	14.55%
Nov.	134,927	150,909	170,365	11.84%	12.89%
Dec.	130,611	146,421	165,996	12.10%	13.37%
Total	**1,541,433**	**1,752,246**	**1,994,856**	**13.68%**	**13.85%**

Total Suburban ADA Services – Monthly

Month	2021 Riders	2022 Riders	2023 Riders	% Change 2021-2022	% Change 2022-2023
Jan.	31,024	38,115	51,267	22.86%	34.51%
Feb.	31,744	41,408	50,418	30.44%	21.76%
Mar.	39,008	52,181	57,671	33.77%	10.52%
Apr.	39,500	49,037	52,720	24.14%	7.51%
May	40,572	49,709	56,564	22.52%	13.79%
Jun.	41,984	49,496	54,380	17.89%	9.87%
Jul.	43,712	47,319	51,734	8.25%	9.33%
Aug.	45,154	52,244	57,952	15.70%	10.93%
Sep.	45,055	50,198	54,810	11.41%	9.19%
Oct.	46,122	49,836	58,351	8.05%	17.09%
Nov.	45,120	50,172	54,849	11.20%	9.32%
Dec.	43,032	47,366	51,845	10.07%	9.46%
Total	**492,027**	**577,081**	**652,561**	**17.29%**	**13.08%**

The year-on-year data shows a steady increase in the usage of the service from both city and suburban areas. This rising demand can be attributed to an aging population and an increase in the overall number of program eligible ADA paratransit customers and registrants since 2020.

Operational Impact of COVID-19 on ADA Certification Ridership Data (2021-Early 2022)

RTA Certification ridership data was unavailable for 2021 and the early part of 2022 due to significant disruptions caused by the COVID-19 pandemic as illustrated in the chart below. Between April 2020 and April 2022, there were no certification charges to the RTA ADA Certification Program, as documented in the prior Triennial Audit (FY2018-2020). This was the result of several emergency measures and operational changes:

- **Closure of Mobility Assessment Centers**: In-person assessments were suspended.
- **Courtesy Extensions**: Six-month eligibility extensions were granted for expiring certifications.
- **Modified Process**: Applicants were screened via phone and given mailed questionnaires.
- **Online Portal**: In January 2022, RTA launched an online portal for applications and renewals.

These adaptations ensured access while complying with public health measures. Federal relief funds (CARES, CRRSAA) supported ADA Paratransit operations during this time, including resumed certification ridership in mid-2022.

RTA ADA Certification Ridership (2021-2023)

Month	2021 RTA Certifications	2022 RTA Certifications	2023 RTA Certifications	% Change 2021-2022	% Change 2022-2023
Jan.	-	-	1,345	N/A	N/A
Feb.	-	-	1,154	N/A	N/A
Mar.	-	-	1,224	N/A	N/A
Apr.	-	-	1,139	N/A	N/A
May	-	417	1,341	N/A	221.58%
Jun.	-	783	1,094	N/A	39.72%
Jul.	-	664	1,182	N/A	78.01%
Aug.	-	562	1,608	N/A	186.12%
Sep.	-	869	1,122	N/A	29.11%
Oct.	-	803	1,478	N/A	84.06%
Nov.	-	1,106	1,364	N/A	23.33%
Dec.	-	1,209	1,307	N/A	8.11%
Total	**-**	**6,413**	**15,358**	**N/A**	**139.48%**

To further analyze performance trends, the following tables present annual and monthly ridership totals by carrier and service area for both Chicago and Suburban ADA services from 2021 to 2023. This breakdown highlights changes in ridership by provider, supports Pace's ongoing evaluation of service demand, and allows for targeted performance assessments.

Annual Ridership by Carrier and Service Area (2021-2023)

Chicago ADA Services

Chicago ADA Services	2021 Total	2022 Total	2023 Total	Riders (2021->2023)	% Change (2021->2023)
CDT	510,958	520,316	580,516	69,558	13.61%
SCR	503,089	552,055	604,239	101,150	20.11%
First Transit	237,354	280,202	328,875	91,521	38.56%
MV	170,251	208,423	231,919	61,668	36.22%
All Chicago Taxis	119,781	191,250	231,604	111,823	93.36%
Chicago TNC	-	-	17,703	17,703	N/A (started in 2023)
Totals	**1,541,433**	**1,752,246**	**1,994,856**		

Among the various service providers, CDT reported the lowest overall ridership increase at 13.61% over the three-year period. For traditional ADA ridership, First Transit experienced the highest increase, with a 38.56% rise from 2021 to 2023. In contrast, the largest increase in nontraditional ADA ridership was seen with All Chicago Taxis, which reported a 93.36% growth over the same period. Transportation Network Company (TNC) services in Chicago were not included in the comparison, as they only began operating in mid-2023.

Suburban ADA Services

Suburban ADA Services	2021 Total	2022 Total	2023 Total	Riders (2021->2023)	% Change (2021->2023)
South Cook	206,010	225,314	252,202	46,192	22.42%
North Cook	126,592	151,991	172,401	45,809	36.19%
West Cook	62,331	75,335	79,223	16,892	27.10%
North Lake County	27,470	30,794	29,710	2,240	8.15%
Kane County	12,286	11,092	12,758	472	3.84%
DuPage County	43,754	67,043	89,398	45,644	104.32%
McHenry County	498	617	723	225	45.18%
Will County	13,086	14,895	16,146	3,060	23.38%
	492,027	577,081	652,561		

In the suburban service area, Kane County reported the lowest overall ridership increase at 3.84% over the three-year period. DuPage County experienced the highest increase, with ridership growing by 104.32% from 2021 to 2023.

We have reviewed the total annual ridership for ADA Paratransit. Between 2021 and 2022, total ridership increased by 14.55%, and between 2022 to 2023, it increased by 13.65%. Within these totals, traditional ADA rides increased by 9.80% in 2022 and by 11.82% in 2023. The remaining portion of the total increase, approximately 4.75% in 2022 and 1.83% in 2023, is attributable to non-traditional rides, such as premium services or rides provided under local policy beyond ADA requirements. The observed increases in ADA paratransit ridership over the review period may impact future funding budget and may require additional resources to maintain service quality and compliance with ADA requirements.

Observations and Recommendations

Observation 1:

Complaint Closeout Timeliness: The average complaint closeout time in 2023 was 73.22 days, representing a 27% increase from the prior year’s average of 57.37 days.

Recommendation 1:

Pace should update its complaint resolution process to include specific turnaround time targets from the date of receipt to final response and conduct an in-depth review with Passenger Services and Customer Relations departments to:

- Identify process bottlenecks
- Determine staffing/resource constraints
- Establish internal service level agreements (SLAs) or escalation timelines
- Implement monitoring tools to track progress

Management’s Response 1:

Pace transitioned to a new Customer Service Management (CSM) system which provides staff with tools to monitor response time to customers. In addition, features included in the new system allow the customer to choose voice, email or text in response to their complaint or inquiry, which has further expedited the closeout process. Management is also evaluating resource constraints as recommended.

Observation 2:

Customer Service Management (CSM) System Reporting Limitation – Lack of Aging Report: The CSM does not currently generate an aging report for complaints. This issue was first noted in the FY18-FY20 Triennial Audit and remains open.

Recommendation 2:

Pace should prioritize the development and implementation of an aging report feature within the CSM system. This report should include but not be limited to:

- The number of days complaints remain unresolved
- Highlight overdue items by severity or complaint type
- Support prioritization by the Passenger Services

Management's Response 2:

Pace has already developed and implemented a comprehensive Open to Close report in CSM. This report tracks the number of days at each stage of the complaint process to closing the complaint. In addition, managers have CSM dashboards to monitor the complaint process in real time. It should be addressed in the report that Observation and Recommendation #2 have been resolved.

Other Observation:

The ADA paratransit increased year over year in 2022 and 2023. No immediate financial impact occurred in 2022 and 2023 due to available sources of funding, and the program was within budget. However, continued increases in ridership may strain future budgets if there are insufficient sources of funding available.

Although outside the scope of this audit period, the region has experienced continued increases in 2024 and 2025 ridership, exceeding budget projections. The RTA Board approved ordinance 2025-21 at the May Board meeting to authorize the disbursement of $25.5 million to Pace from the RTA ADA Paratransit Reserve to remedy the year-end 2024 ADA Paratransit budget deficit caused by increasing ridership and expenses in traditional paratransit and the TAP and RAP programs. Due to a determination of *not in substantial accordance with budget for the first quarter* ADA Paratransit financial results, the ordinance also required the RTA and Pace staffs to develop an Action Plan to address the developing 2025 ADA Paratransit budget shortfall. ADA Paratransit ridership has continued to increase in the first few months of this year and is now expected to exceed 2025 budgeted levels.

Per the RTA Board of Directors, Pace should implement the attached ADA Action Plan that the RTA Board of Directors approved in June 2025 in RTA Ordinance 2025-26. (See Attachment 1, RTA Board Ordinance 2025-26 and ADA Action Plan). Additional follow-up from the RTA Audit team may be necessary for implementation of this Action Plan.

Next Steps

- An additional audit of the ADA paratransit program, or any section of it, may be conducted prior to the next triennial. RTA will provide advance notice prior to any such audit.
- The next triennial audit covering fiscal years 2024-2026 will commence in 2027.

RTA Ordinance 2025-26

Attachment 1

Regional Transportation Authority

Ordinance No. 2025-26

175 W Jackson Blvd
Suite 1550
Chicago, IL 60604

312 913 3200
rtachicago.org

WHEREAS, section 2.01(d) of the Regional Transportation Authority Act was amended in 2012 to require full funding of the adopted ADA Paratransit budget for all future years by establishing an ADA Paratransit Fund to be used solely for the provision of regional ADA Paratransit service;

WHEREAS, the Regional Transportation Authority (RTA) is committed to providing accessible public transportation services in accordance with the Americans with Disabilities Act (ADA) of 1990;

WHEREAS, ADA Paratransit ridership has been rising sharply and is expected to exceed 2025 budget projections by 1.3 million to 1.8 million rides, creating a projected funding shortfall of $65 million;

WHEREAS, RTA Ordinance 2025-21, adopted at the May Board meeting, disbursed $25.5 million to Pace from the RTA ADA Paratransit Reserve to remedy the year-end 2024 ADA Paratransit budget deficit and required RTA and Pace staffs to develop an Action Plan to address the developing 2025 ADA Paratransit budget shortfall;

WHEREAS, staff recommends adopting a strategic action plan to address this gap, supported by a set of near-term funding options and a longer-term reform path;

WHEREAS, the guiding principles for this Action Plan include protecting mobility access, promoting financial sustainability, leveraging one-time funds wisely, ensuring equity and transparency, and linking action to broader reform;

WHEREAS, additional 2025 ADA Paratransit funding in excess of $30 million is likely to be required from a combination of potential sources including existing ADA Paratransit Reserve, incremental sales tax/PTF collections, and federal COVID-19 funding reserves;

WHEREAS, section 4.03.3 (e) of the Regional Transportation Authority Act directs the RTA to fund ADA Paratransit from the receipts of the 2008 increase in RTA sales tax and Public Transportation Funds colloquially known as Sales Tax II and PTF II; and

WHEREAS, section 4.03.3 (a) of the Regional Transportation Authority Act directs the RTA to retain 15% of the receipts of the original RTA sales tax levied since 1983 colloquially known as Sales Tax I.

ADOPTED JUNE 12, 2025

Regional Transportation Authority

NOW, THEREFORE, BE IT ORDAINED BY THE BOARD OF DIRECTORS OF THE REGIONAL TRANSPORTATION AUTHORITY THAT:

1. The Board of Directors hereby approves the ADA Paratransit Action Plan, as presented in the attachment to this ordinance, which includes proposed immediate and future changes to the ADA Paratransit program to address the projected funding shortfall and ensure long-term sustainable success.

2. The Executive Director, or her designee, is further authorized to prepare and present to the Board of Directors, as necessary, budget amendments for 2025 to reflect the increased ridership levels, revenues, and expenses within the ADA Paratransit program, incorporating the estimated impacts of the Action Plan initiatives and the authorized funding options.

3. This Ordinance shall be in full force and effect from and after its passage and approval.

ADA Paratransit Action Plan

Immediate programmatic changes and actions to be implemented as soon as possible in 2025

- Pace will set a monthly ride cap of 30 rides per ADA certified rider on the Taxi Access Program (TAP) and the Ridershare Access Program (RAP)
- Pace will restore the TAP and RAP base fare to $3.25
- CTA, Metra, and Pace will implement Ride Free fixed route rides for ADA certified riders on all fixed route transit throughout the region
- RTA Mobility Services will complete a review of the ADA certification program including:
    - Federal regulations for certification programs
    - Structure and certification process
    - Quality assurance & peer comparison
    - Cost reduction efforts

Future programmatic changes and actions to be implemented in the 2026 budget cycle and/or the 2026 update to the Human Services Transportation Plan (HSTP)

- Re-estimation of ridership and program cost projects for ADA Paratransit budget and recommended fare increase
- Further adjustments to TAP/RAP subsidy parameters based on results from Immediate actions implemented in 2025, additional peer review, and further market analysis
- Launch HSTP update process to include a goal of aligning county funded RAP(s) with ADA TAP/RAP for standardization and better coordination of regional paratransit services