



Certification of Equivalent Service Tennessee Department of Transportation

The _____ (name of agency) certifies that its demand responsive service offered to individuals with disabilities, including individuals who use wheelchairs, is equivalent to the level and quality of service offered to individuals without disabilities. Such service, when viewed in its entirety, is provided in the most integrated setting feasible and is equivalent with respect to:

- (1) Response time
- (2) Fares
- (3) Geographic service area
- (4) Hours and days of service
- (5) Restrictions on trip purpose
- (6) Availability of information and reservation capability
- (7) Constraints on capacity or service availability

In accordance with 49 CFR 37.77, public entities operating demand responsive systems for the general public which receive financial assistance under section 18 of the Federal Transit Act must file this certification with the appropriate state program office before procuring any inaccessible vehicle. Such public entities not receiving FTA funds shall also file the certification with the appropriate state program office. Such public entities receiving FTA funds under any other section of the FT Act must file the certification with the appropriate FTA regional office.

This certification is valid for no longer than one year from its date of filing.

(Name of Authorized Official)

(Title)

(Signature)

(Date)

Certification of Equivalent Service Assessment & Documentation

INTRODUCTION

The ADA requires demand responsive public transit systems to provide program accessibility for persons with disabilities. Such features and services of the transit system must be provided in the most integrated manner possible. A demand responsive system is not required to buy only accessible vehicles, but may purchase non-accessible transit vehicles once it has reached the point where it can assure that an individual with a disability requesting service on any part of the system can be transported via an accessible vehicle without restriction on trip purpose as quickly and at the same fare as a nondisabled person requesting service in the same area on the same day at the same time.

Vehicle accessibility standards are only one part of the ADA access requirements. Access to available program information, reservation capability, constraints on transportation capacity, and the availability of service must also be considered a priority in programming.

The steps below provide guidance on completing the assessment and documentation to certify that the transportation program is providing equivalent service to the general public without discrimination toward individuals with disabilities

STEP ONE: Analysis of Existing Fleet

The assessment should provide a complete active vehicle fleet inventory detailing the vehicle's accessibility standards, the vehicle's assigned service area or destination (if applicable), and the vehicle's storage location as well as documentation for the following questions regarding the agency's existing active fleet:

- 1) What is the number and percentage of existing vehicles in the agency's active fleet that meet the accessibility standards? Accessibility standards for a vehicle include a motorized lift, a low-floor vehicle, and/or a manually operated ramp. The reported number and percentage of accessible vehicles the agency operates should agree with the Vehicle Perpetual Inventory the agency currently submits to TDOT on a semi-annually basis.
- 2) Are there any other vehicles, which can with only minor changes be brought into accessibility compliance? If so, how many vehicles are out of compliance, and how many can be brought into compliance? What minor changes are needed to bring those vehicles into compliance?
- 3) Does the agency assign specific vehicles to specific service areas or service destinations? Is the agency's fleet stored at one central location or is it decentralized at multiple locations? Each vehicle's assigned service area/destination (if applicable) and storage location should be identified in the complete vehicle fleet inventory.

STEP TWO: Response Time / Fares / Geographic Coverage / Hours & Days of Service

The assessment should document the way by which the system is able to respond to a request for accessible transportation on any of its services in a way that matches the response time for nondisabled

ride requests. The assessment should also document the fare charged for nondisabled, disabled, guests, and care attendants utilizing the service. Documentation of the geographic area as well as the days and hours of available service to nondisabled and disabled individuals should also be provided in the assessment.

STEP THREE: Restrictions on Trip Purpose

The assessment should document any trip purpose restrictions for both nondisabled and disabled users of the service.

STEP FOUR: Availability to Program Service Information

The assessment should provide documentation for the following questions regarding the availability to program service information:

- 1) What efforts have been undertaken to make program service information such as brochures and schedules available and accessible to persons with visual impairments?
- 2) Does all literature/advertising include information that all services are open to the general public, including persons with disabilities?
- 3) Describe any special outreach conducted to inform various segments of the disabilities community of program service availability.

STEP FIVE: Reservation Capability

The assessment should provide documentation for the following questions regarding reservation access and capability:

- 1) What arrangements have been made to allow access to dispatch service by persons with hearing impairments? (Examples: equipping dispatch with a Telecommunications Device for the Deaf (TDD), having calls relayed by other agency with TDD, etc.)
- 2) Do the above-described arrangements cover all transportation services provided as part of the transit program and do they avoid imposing any greater cost or inconvenience on such disabled persons than on other riders?
- 3) Are these arrangements prominently publicized in all system literature or media advertising?
- 4) Describe any special outreach conducted to inform hearing-impaired persons of this access to the dispatch function.

STEP SIX: Constraints on Capacity or Service Availability

The assessment should provide documentation of trip denials including information on the individual attempting to schedule a trip, and the reason for the denial.